

Council Briefing Agenda

Date: Thursday, 10 July, 2025

Time: 9:00 am

Location: Civic Centre, Te Iwitahi, 9 Rust Avenue

Elected Members: His Worship the Mayor Vince Cocurullo
Cr Gavin Benney
Cr Nicholas Connop
Cr Ken Couper
Cr Jayne Golightly
Cr Phil Halse
Cr Deborah Harding
Cr Patrick Holmes
Cr Scott McKenzie
Cr Marie Olsen
Cr Carol Peters
Cr Simon Reid
Cr Phoenix Ruka
Cr Paul Yovich

For any queries regarding this meeting please contact the Whangarei District Council on (09) 430-4200.

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2.1 Whangarei District Council Glyphosate Use Review

Meeting: Council Briefing
Date of meeting: 10 July 2025
Reporting officer: J Devine, Transportation Manager

1 Purpose / Te Kaupapa

To present to Council a review on the use of Glyphosate by Council contractors as a maintenance tool across council activities.

2 Background / Horopaki

Council has received requests not to use Glyphosate for weed control purposes and a request to undertake an investigation was included in the 2024 Long Term Plan. Glyphosate (known commercially as “Roundup”) has been subject to public scrutiny for some time due to known and stipulated health concerns. This herbicide can also impact the natural environment due to spray drift and runoff. These adverse effects are most notable when poor herbicide application methods are used, indicating an opportunity to improve public perception by requiring more stringent health and safety protocols.

The council engaged WSP to assess Glyphosate’s current use as a maintenance tool across council activities and investigate alternative weed control methods to consider as a substitute for Glyphosate. This review considers factors regarding costs, health implications and environmental effects of both Glyphosate and any suggested alternatives to facilitate the council’s decision-making process.

3 Discussion / Whakawhiti kōrero

A full copy of the Review document is provided in **Attachment 1**. A summary of the Review findings is provided below.

The review places significant focus on roadside spraying but extends to other Council managed areas such as parks and natural areas that may be included when relevant. The reviewer was also asked to investigate the current use and efficacy of Glyphosate by WDC and compare this to the stance and approaches of other councils across New Zealand.

3.1 WDC Current use of Glyphosate

WDC appoint accredited contractors that use Glyphosate and other herbicides for weed control along the roadsides and within public parks under the approval and guidance of best practice for safety from the New Zealand Environmental Protection Authority (NZ EPA). Roadside spraying is applied three times annually, using spraying vehicles equipped with down-turned spray booms for localised applications with minimal spray drift. Roadsides with pedestrian footpaths require precise weed control particularly along the expansion joints, achieved with a small 4x4 vehicle with a single fixed spray nozzle.



Roadsides without footpaths require two meters of control from the road edge, achieved by using a larger vehicle with an extendable boom arm fixed with several nozzles to span the required 2-meter width



Within public parks, Glyphosate (and several other herbicide products) are primarily applied by using knapsack sprayers.

3.2 Potential Negative Impacts of Glyphosate

The potential negative impacts elicit public apprehension to the continued use of Glyphosate. Currently, the NZ Environmental Protection Agency, (EPA), holds the stance that Glyphosate is safe for use if guidelines are followed.

The use of Glyphosate/Roundup is currently approved for use in New Zealand by the Environmental Protection Agency in 2019, who state; "... Based on the balance of scientific evidence, we consider that provided users follow safety instructions on the labels of products containing glyphosate, it can be used safely to ensure no harm comes to the people or the environment."

However, everyone does not share this outlook. Further, ongoing concerns are raised about the uncertainty regarding Glyphosate's carcinogenic status, with the United States Environmental Protection Agency (US EPA) concluding that it is not likely to be carcinogenic, while the International Agency for Research on Cancer (IARC) concluded that it likely is carcinogenic.

Because the US EPA has held their stance on Glyphosate safety, other entities internationally including the NZ EPA have continued to cite this stance as a justification for continued support of the substance. These disagreements in Glyphosate safety indicate the sensitive nature of this issue, with a lack of definitive evidence and potentially a failure to follow objective scientific approaches.

3.3 Mill Rd Spray Incident Complaint

On the 21 of October 2021 Council received a complaint about the roadside weed spraying that had occurred on Mill Rd as part of Council's Urban Roadside weed spraying program. The complaint received was that during the weed spraying activity on Mill Rd that day, Council's weed spraying contractor had sprayed over the feet of three children who were walking down Mill Rd.

Due to the serious nature of the complaint Council decided to engage an independent investigator, Incident Prevention Group (Ltd) from Taupo, to investigate the incident and report back to Council.

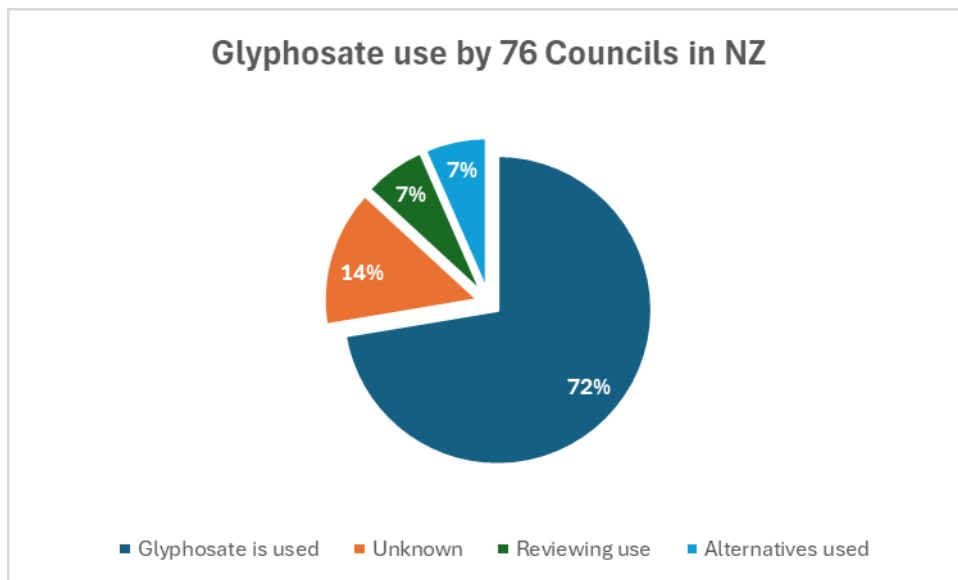
The report looked at the activities of the spraying contractor in some detail that occurred on that day and concluded.

“It is the writer’s opinion, that there has not been a direct spray event over the children, but there exists a possibility that over spray may have occurred and it was this that the witness saw.”

3.4 Weed Control By other Councils

A review of all other councils across New Zealand was undertaken to determine the stances held around Glyphosate. The key findings are summarised within the attached report. The majority of Councils throughout NZ are still using Glyphosate products in their operations within their Districts. A number of those Council have considered the use of alternative products or are actively trialing the use of alternative products.

The main concern raised by many of the Councils is the cost difference of effective alternative products available in the market.



3.4 Recommended Additional Measures

Due to the disparity in stances held between the NZ EPA and most peer-reviewed scientific literature around the safety of Glyphosate and the current political conflict between NZ EPA and ELI, alternative methods of weed control could be investigated.

However, if alternatives are not logistically feasible and regulatory changes do not eventuate, the following recommendations are provided to further improve the safety of Glyphosate use for both public health and the environment:

- Contractors should be compensated for standby time if safety requirements temporarily halt spraying activities (e.g., pedestrians using a stretch of path).
- A minimum spraying distance upwind of people or animals should be specified. With sufficient spray drift controls in place 10 meters could be sufficient.
- The Specification should define a maximum height that herbicide can be sprayed above the ground to minimise spray drift
- The Specification should also require that the proportion of droplets less than 100µm is kept to a minimum as these smaller droplets contribute disproportionately to spray drift. A suggested acceptable percentage of droplets below 100µm could be <10%.
- Temporary signage erected in parks during spraying may need to remain for a longer period to give sufficient time beyond the current drying period for Glyphosate to break down or be washed off by rain.
- Glyphosate should not be used if any structures (culverts, water tables, etc.) are known to feed into a receiving aquatic ecosystem (including but not limited to streams, rivers, wetlands, ponds, or lakes), due to the severe impacts known to these environments.

3.5 Conclusion

The review finds that Glyphosate remains the most effective and cost-effective weed control method, but health and environmental concerns may justify consideration of more expensive alternatives.

This review concludes by presenting three options for WDC to consider.

- (1) If Glyphosate use is continued, several recommendations are suggested to ensure that safe and efficacious application is adhered to.
- (2) Several alternative weed control methods are provided including indicative prices compared to Glyphosate.
- (3) Alternatively, Glyphosate use could be reduced but not entirely replaced by supplementing with the alternative methods to evaluate their effectiveness.

4 Financial/budget considerations / Ngā pānga pūtea/tahua

4.1 Comparison of Alternatives

In the attached report the comparison of alternative products and costings to meet the current service level for vegetation control on the roads and Parks demonstrates that Glyphosate remains the most cost effective and cheapest method for the control of weeds.

Table 2: A summary of the findings from Section 4 with costs based on Auckland data.

Method	Cost	Advantages	Disadvantages
Glyphosate	\$562 per km per year	Long-term kill (lower frequency of application). Non-selective.	Public perception. Potential carcinogen.
Alternative Herbicides	\$1,459 per km per year	Some are less ecotoxic. Fewer non-target impacts.	Potentially more harmful to human health. Not non-selective (cannot control all problematic species). Higher frequency of application required due to shorter-term kill.
High Pressure Steam	\$1,561 per km per year	No toxicity/ecotoxicity.	Excess carbon footprint. May need supplementary control in the form of herbicide and mechanical methods. Higher frequency of application required.
Hot Water Treatment	\$2,372 per km per year	No toxicity/ecotoxicity.	Excess carbon footprint. May need supplementary control in the form of herbicide and mechanical methods. Higher frequency of application required.
Mechanical	\$2,000 per km per year	No toxicity/ecotoxicity.	Cost estimate may not be accurate. Higher frequency of application required. May need supplementary control in the form of herbicide application.

4.2 Whangarei District Council Roading operational costs

The cost to undertake the Road side spraying operations as provided in the new maintenance Contacts recently approved by Council are;

Zone	Total Length	Cost
Rural	2400	\$90 per km per year
Urban	700	\$180 per km per year
Total cost per annum		\$340,000

5 Significance and engagement / Te Hira me te Arawhiti

The decisions or matters of this Agenda do not trigger the significance criteria outlined in Council's Significance and Engagement Policy, and the public will be informed via the publication of this agenda on the website

6 Attachments / Ngā Tāpiritanga

1. Whangarei DC Glyphosate Use Review – WSP May 2025



Confidential

Whangārei District Council

Glyphosate Use Review

30 May 2025

1-14591.00






Glyphosate Use Review

Whangārei District Council

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REV	DATE	DETAILS
1	24/03/2025	Draft review suggestions incorporated

	NAME	DATE	SIGNATURE
Prepared by:	Jordan Stewart	11/03/2025	
Reviewed by:	Wayne Teal	30/05/2025	
Approved by:	Wayne Teal	30/05/2025	

This report ('Report') has been prepared by WSP exclusively for Whangarei District Council ('Client') in relation to a review of the continued use of Glyphosate and an investigation of alternatives ('Purpose') and in accordance with the Short form Agreement with Whangārei District Council dated 27/11/2024. The findings in this Report are based on and are subject to the assumptions specified in the Report. WSP accepts no liability whatsoever for any reliance on or use of this Report, in whole or in part, for any use or purpose other than the Purpose or any use or reliance on the Report by any third party.



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GLOSSARY

WDC	Whangārei District Council
NZ EPA	New Zealand Environmental Protection Authority
US EPA	United States Environmental Protection Agency
ELI	Environmental Law Initiative
IARC	International Agency for Research on Cancer
HPS	High Pressure Steam
HWT	Hot Water Treatment

EXECUTIVE SUMMARY

Whangārei District Council (WDC) have received continuous requests not to use Glyphosate for weed control purposes. Glyphosate has been subject to public scrutiny for some time due to known and stipulated health concerns. This herbicide can also impact the natural environment due to spray drift and runoff. These adverse effects are most notable when poor herbicide application methods are used, indicating an opportunity to improve public perception by requiring more stringent health and safety protocols.

Accordingly, WDC have engaged WSP to assess Glyphosate's current use as a maintenance tool across council activities and investigate alternative weed control methods to consider as a substitute for Glyphosate. This review considers factors regarding costs, health implications and environmental effects of both Glyphosate and any suggested alternatives to facilitate the council's decision-making process. The review finds that Glyphosate remains the most effective and cost-effective weed control method, but health and environmental concerns may justify the selection of a more expensive alternative.

This review concludes by presenting three options for WDC to consider. (1) If Glyphosate use is continued, several recommendations are suggested to ensure that safe and efficacious application is adhered to. (2) Several alternative weed control methods are provided including indicative prices compared to Glyphosate. (3) Alternatively, Glyphosate use could be reduced but not entirely replaced by supplementing with the alternative methods to evaluate their effectiveness.

1 GLYPHOSATE OVERVIEW

1.1 SCOPE

Whangarei District Council (WDC) engaged WSP to conduct an extensive literature review on the current status and perspectives around the use of the herbicide, Glyphosate, to determine whether its use should be continued, and provide alternatives if not. This review will investigate the current use and efficacy of Glyphosate by WDC and compare this to the stance and approaches of other councils across New Zealand. Consideration will be given to public health concerns, environmental effects and cost implications to provide WDC with objective recommendations. This review's places significant focus on roadside spraying but extends to other Council managed areas such as parks and natural areas may be included when relevant. Finally, the review will also consider literature regarding "Glyphosate-based" herbicides which contain analogous compounds and equivalent function so will be referred to as Glyphosate from here on out.

1.2 INTRODUCTION

1.2.1 *WHANGAREI DISTRICT COUNCIL CURRENT USE OF GLYPHOSATE*

WDC appoint accredited contractors that use Glyphosate and other herbicides for weed control along the roadsides and within public parks under the approval and guidance of best practise for safety from the New Zealand Environmental Protection Authority (NZ EPA). Roadside spraying is applied three times annually, using spraying vehicles equipped with down-turned spray booms for localised application with minimal spray drift. Roadsides with pedestrian footpaths require precise weed control particularly along the expansion joints, achieved with a small 4x4 vehicle with a single fixed spray nozzle. Roadsides without footpaths require two meters of control from the road edge, achieved using a larger vehicle with an extendable boom arm fixed with several nozzles to span the required 2-meter width. Currently, WDC specifications do not regulate spray application near or over roadside drains which may feed into natural aquatic environments but there are specific herbicides tailored to reduce impacts on these ecosystems. It is expected that the applicators use these specific 'brews' when working near these susceptible environments. The specifications for this work do not define which herbicide must be used, but it is likely that Glyphosate is primarily chosen due to the target species, affordability and effectiveness. Within public parks, Glyphosate (and several other herbicide products) are primarily applied by using knapsack sprayers (Rowse, 2018). Concentrations of Glyphosate are also not specified by WDC and are determined by the contractor based on manufacturer instructions – or label rates.

1.2.2 *GLYPHOSATE INTENDED FUNCTION*

Glyphosate is a synthetic organophosphorus compound known as phosphonate ($C_3H_8NO_5P$) used to kill unwanted plants in a range of contexts, including agriculture, horticulture, residential, and ecological remediation. This compound works by inhibiting the plant enzyme EPSP (5-enolpyruvylshikimate-3-phosphate synthase) required for the biosynthesis of essential aromatic amino acids, leading to a systemic breakdown of regular plant function (Schönbrunn et al., 2001). EPSP is only found in algae, plants, bacteria, and fungi, meaning that it does not have the same lethal and rapid implications if absorbed by animals (Schönbrunn et al., 2001). Glyphosate has the benefit of being a broad spectrum (non-selective) herbicide that is effective in most contexts, including annual and perennial plants because the EPSP metabolic pathway (known as the shikimate pathway) is shared by all plant species (Farmer, 2010).

1.2.3 *GLYPHOSATE UNINTENDED IMPACTS*

The widespread use of Glyphosate has produced sufficient selection pressure for the evolution of resistance to the herbicide, with a currently documented 48 weed species having developed several different molecular

adaptations to the compound (Baek et al., 2021). Consequently, glyphosate resistance may lead to the necessity for higher concentrations or volumes of application, increasing the level of spray drift or leaching, leading to a higher risk of impacting non-target native species which likely do not possess resistance (Boutin et al., 2014; Cederlund, 2017; Ferreira et al., 2023; Florencia et al., 2017). Furthermore, non-target effects extend beyond native plants, as ecotoxicity is reported in both aquatic and terrestrial environments, indicating ecosystem level impacts from Glyphosate (Klátyik et al., 2023, 2024).

Additionally, despite the absence of the shikimate pathway in the animal kingdom, glyphosate is known to impose inadvertent and harmful effects, notably being neurotoxic to humans and a range of other species (Costas-Ferreira et al., 2022). One meta-analysis found that the effects are sub-lethal but still severe and most prominently impacting aquatic animals (Evalen et al., 2024). Further, studies on a range of prominent animal groups (fish, birds and mammals) found impacts including endocrine disruption that inhibited ordinary reproductive hormone production, abnormal development of reproductive tissue, reduction in gamete production and higher embryo mortality (Jarrell et al., 2020). Additionally, Glyphosate impacts mycorrhizal fungi and Annelids (earthworms) which are both important components of healthy soil (Gill et al., 2017). Glyphosate also impacts herpetofauna (lizards and amphibians) and arthropods – including the class Insecta which consists of many ecologically and economically important pollinators, seed dispersers, predators, and detritivores (Gill et al., 2017). These impacts are vast, but other herbicides may have similar trade-offs. Accordingly, the impacts of glyphosate must be compared to any alternative herbicide to determine the most appropriate option.

These negative impacts subsequently elicit public apprehension to the continued use of Glyphosate. Currently, NZ EPA holds the stance that Glyphosate is safe for use if guidelines are followed (NZ EPA, n.d.). However, this outlook is not shared by everyone, and 379 ACC claims associated with Glyphosate exposure have been accepted since 1990 and a further 60 have been declined (Martin, 2025). Further, ongoing concerns are raised about the uncertainty regarding Glyphosate's carcinogenic status (Mead, 2021), with the United States Environmental Protection Agency (US EPA) concluding that it is not likely to be carcinogenic, while the International Agency for Research on Cancer (IARC) concluded that it likely is carcinogenic (Benbrook, 2019). The IARC's research methodology and results were found to be much more reliable (Benbrook, 2019). Contrarily, Morini (2018) points out that this discrepancy is due to the IARC reporting the hazard while the EPA reports the risk (factoring in probability of exposure at high enough levels to cause cancer). Because the US EPA has held their stance on Glyphosate safety (US EPA, 2025), other entities internationally including the NZ EPA have continued to cite this stance as a justification for continued support of the substance (NZ EPA, 2024; Temple, 2016). Additionally, the NZ EPA's 2016 report produced in disagreement to IARC's findings followed a scientifically flawed approach and cannot be relied upon (Douwes et al., 2018). The NZ EPA's stance is currently being challenged by the Environmental Law Initiative (ELI) for not regulating Glyphosate with proper precautions (ELI, 2024). These disagreements in Glyphosate safety indicate the sensitive nature of this issue, with a lack of definitive evidence and potentially a failure to follow objective scientific approaches.

1.2.4 *SAFE USE, FREQUENCY AND EXTENT OF EXPOSURE*

These literature findings provide strong evidence that Glyphosate is a hazardous substance that can have severe impacts on human health and the environment. However, it is important to consider the risks of Glyphosate use when suitable health and safety protocols are followed at the typically low frequency required to maintain adequate vegetation control. Specifically, the low frequency of exposure to the public from routine spraying likely has insignificant implications if spray drift is sufficiently controlled. Contrarily, frequent exposure to spray applicators working on a daily basis may have more significant adverse effects. Accordingly, attempts to further reduce exposure to the general public may only improve public relations with only minimal improvements to public health. Meanwhile, the health and safety procedures employed by spray applicators may be much more important but should remain the responsibility of the contractor and not WDC.

The literature indicates that Glyphosate impacts aquatic environments, soil ecology, and important invertebrates. However, WDC's current needs for Glyphosate are localised to areas requiring vegetation control, including the roadside and park areas of high weed prominence. Accordingly, much of the wider landscape

remains beyond the extent of spraying activities, providing unaffected population refuges for species impacted within sprayed areas. Additionally, areas requiring spray are inherently of lower ecological value, because the open disturbed habitats facilitate the establishment of exotic species. These environments are unlikely to contain threatened endemic species that are typically confined to less modified systems. Ultimately, if Glyphosate is applied in a manner that avoids spray drift, leaching, and runoff into non-target environments, then it is unlikely that its use will have severe impacts at a broader population or environmental scale.

1.2.5 *REVIEW OUTLINE*

The range of severe impacts that Glyphosate can cause justifies the following investigation. For the reported effects of Glyphosate that are not universally agreed upon (such as carcinogenic status), the Precautionary Principle should be employed until a definitive consensus is reached. Accordingly, it should be assumed that Glyphosate is carcinogenic until proven otherwise. Furthermore, if ELI are successful, Glyphosate may become more heavily regulated or banned entirely as has already occurred in several countries. However, this review will investigate whether current best practise for the application of Glyphosate sufficiently mitigates the identified risks, in which case continued use may be acceptable. Further, if current approaches are not sufficient, further health and safety protocols will be considered to determine whether these risks can be plausibly mitigated. This review will also investigate the approaches of other councils in New Zealand determine whether effective alternative methodologies or herbicides could be adopted by WDC. Finally, the cost, efficacy, and risks of other herbicides/control measures will be compared with Glyphosate to provide alternative options for WDC.

2 BEST PRACTICE FOR SAFE GLYPHOSATE USE

2.1 CURRENT PROTOCOL FOR GLYPHOSATE USE

The specifications for spraying provided by WDC to the client do not define all health and safety practises to be followed by the contractor as it is expected that the contractor is following suitable safety measures. Specifically, WDC requires that the contractor follows manufacturer instructions and is a certified spray applicator. Accordingly, it will be assumed here that the contractors are currently following standards specified by the NZ EPA as the governing body in New Zealand for the regulation of this substance.

2.1.1 EPA GUIDELINES

The following is retrieved directly from NZ EPA (NZ EPA, 2015):

Before you spray

- *Read all instructions on the label and follow them.*
- *Make sure you are using the right product for the job you are doing.*
- ***Confirm your spray area is not close to water, standing water that flows to streams, rivers, lakes or ponds.***
- *Check the weather forecast. Make sure no rain is predicted for at least 24 hours. Avoid spraying when it is windy.*
- *Clear children and pets from the area and keep them well away.*
- *Follow the label advice on the need for protective clothing.*

After spraying

- *Wash your hands, face and clothing.*
- *Keep children and pets away until the spray has dried, or for the amount of time indicated on the label.*
- *Read the instructions on the label to help you safely dispose of any unused product and packaging.*

2.1.2 WDC ROADSIDE SPECIFICATION

WDC's roadside specification provides some additional requirements of the contractor to avoid some environmental damage and harm to public health. A summary of these specifications include:

- not spraying areas that rely on vegetation for soil stability.
- Precise nature of herbicide application, including widths of roadside to be sprayed, ranging from 2 meters to 50mm depending on the type of roadside.
- Not spraying within 5 meters of people or animals.
- Not spraying directly upwind of people or animals.
- Not spraying in winds over 10kph.
- Alternatives are considered before herbicide is used.
- Timing is considered to avoid busy periods.

- Informing public through use of signage and public notices in local newspapers.

2.2 SUFFICIENCY OF CURRENT PROTOCOL

There is currently reasonable consideration towards ensuring public health and safety while applying herbicides. However, these considerations are built around the NZ EPA's stance that Glyphosate is not carcinogenic. Should the EPA's stance be revised, the current level of care may require re-evaluation.

2.2.1 CONCERNS WITH CURRENT APPROACH

1. There is currently a high level of care afforded to public health if all specifications are followed correctly. Unfortunately, some of these specifications can be easily overlooked or expedited as may have occurred during the events investigated on the 20th of October 2021 when 3 children were allegedly caught in spray drift on Mill Road, Whangarei. For this to occur, the contractor would have had to failed to adhere to the specification of not spraying within 5 meters of people or animals. The exact reasoning for this failure to follow specifications was not determined in the formal investigation and numerous variables could have contributed to this scenario. However, one potential variable was not discussed in this formal investigation: being near the end of the workday, it is possible that the contractor was in a hurry to finish work. This assumption would be exacerbated by the basis of payment to the contractor which is determined by the number of kilometers/volumes sprayed. This basis of payment could inadvertently incentivize skipping over safety measures to improve efficiency (kilometers sprayed per hour). It is important to note that the formal investigation found that the children were not directly sprayed by the vehicle but there is potential for them to have intercepted some spray drift.
2. The Specification defines that no spray application shall occur directly upwind of people or animals, but no distance is provided and is therefore left up to interpretation by the contractor.
3. The Specification does not define a maximum height for the spray wand to be held above the ground or desired target. Spray boom height is known to be a significant contributing factor for spray drift in an agricultural context (Nordby & Skuterud, 2006) and will also likely have influence for roadside application. Additionally, spray droplet size was found to be a strong predictor of spray drift, with droplets $\leq 100 \mu\text{m}$ contributing disproportionately to spray drift (Arvidsson et al., 2011). Factors determining droplet size are also not defined in the Specification.
4. The NZ EPA inform to keep people and animals away from sprayed surfaces until the herbicide has dried (withholding period). There is no peer reviewed literature to back up that Glyphosate becomes safe to humans once it is dry. Contrarily, studies have shown that Glyphosate can persist within sprayed vegetation for up to a year after application (Edge et al., 2021). Accordingly, this claim that Glyphosate is safe once dry should be taken with scepticism.
5. The level of consideration towards the environment is not as comprehensive as for health and safety. One discrepancy has been identified between the EPA guidelines and the WDC Specification. It is stated by EPA that spraying should not be conducted near water bodies to avoid damaging aquatic ecosystems. However, the WDC Specification states that spraying should include all culverts and water tables. This approach may be ok for some structures, including under favourable 'dry conditions', but care must be taken as some culverts and water tables may also meet the definition of a "stream" or "intermittently flowing stream" as set out in the Regional Plan (Northland Regional Council, 2024). One study found that urban use of Glyphosate contributes significantly to Glyphosate concentrations in streams (Kolpin et al., 2006).

2.3 RECOMMENDED ADDITIONAL MEASURES

Due to the disparity in stances held between the NZ EPA and most peer-reviewed scientific literature around the safety of Glyphosate and the current political conflict between NZ EPA and ELI, it is recommended that alternative methods of weed control are investigated. Notably, if ELI are successful, Glyphosate could become much more heavily regulated, and a complete ban could be possible as is already the case in several other countries. Accordingly, it would be beneficial to begin contemplating alternatives before any regulatory changes occur. However, if alternatives are not logistically feasible and regulatory changes do not eventuate, the following recommendations are provided to further improve the safety of Glyphosate use for both public health and the environment:

1. Contractors should be compensated for standby time if safety requirements temporarily halt spraying activities (e.g., pedestrians using a stretch of path). This potential extra cost should be considered as an investment towards public health and assurance of care afforded to the safe use of hazardous chemicals.
2. A minimum spraying distance upwind of people or animals should be specified. With sufficient spray drift controls in place (see recommendation 3) 10 meters could be sufficient. This could include exclusion zones in the form of signage and greater supervision to exclude public.
3. One current contractor's vehicle appears to have the spray wand fixed sufficiently close to the ground which should minimise spray drift. The Specification should still define a maximum height that herbicide can be sprayed above the ground to ensure that any change in contractor or equipment is held to the current standard. The Specification should also require that the proportion of droplets less than 100µm is kept to a minimum as these smaller droplets contribute disproportionately to spray drift (Arvidsson et al., 2011). A suggested acceptable percentage of droplets below 100µm could be <10%. Droplet size is determined by spray nozzle design so may require a change in equipment. Additionally, the use of adjuvants or surfactants can help increase droplet size (Basilio et al., 2024).
4. Temporary signage erected in parks during spraying may need to remain for a longer period to give sufficient time beyond the current drying period for Glyphosate to break down or be washed off by rain.
5. If any structures (culverts, water tables, etc.) are known to feed into a receiving aquatic ecosystem (including but not limited to streams, rivers, wetlands, ponds or lakes) Glyphosate should not be used due to the severe impacts known to these environments (Evalen et al., 2024; Klátyik et al., 2024).

2.4 WEED CONTROL BY OTHER COUNCILS

A review of all other councils across New Zealand was undertaken to determine the stances held around Glyphosate. The key findings are summarised within Appendix A. These findings provide evidence that some alternative approaches are being pursued elsewhere in the country and may provide WDC with additional options to consider.

2.5 SUMMARY

The uncertainty around Glyphosate safety and the impending potential regulatory changes makes it imperative that alternative weed control methods are considered. However, while alternatives with similar efficacy are investigated, five additional measures have been recommended to improve safety if Glyphosate use continues.

3 CONTRACTOR GLYPHOSATE PERSPECTIVE AND BEST PRACTISE RECOMMENDATIONS

Team Vegetation is one contractor used by WDC for vegetation control. An interview with the former owner and current safety and HR manager of this company, Don Campion, was conducted on the 28th of February to gain a contractor's perspective around the use of Glyphosate. Team Vegetation is a multigenerational business that has been operating since the 1970's and has continued to retain repeat clientele by providing effective weed control solutions while maintaining crucial health and safety precautions. This reputation is essential to the ongoing viability of the company as any poor performance or breaches in health and safety protocol could result in the loss of contracts and continued business. Team Vegetation made it clear that these implications provide clear incentives to hold their services to a high standard.

To retain this reputation, Team Vegetation keep detailed documentation of site safety plans, spray diaries recorded at 15-minute intervals, and automatic GPS tracking records when spraying is active/inactive. These records help facilitate audits from several organisations, including WorkSafe every 2 years, and Site Safe NZ every 5 years. These audits ensure safe practise is followed in all aspects of business operations from spray application to herbicide storage. Team Vegetation reported that they have continued to receive the highest ratings for safety due to their stringent attention to record keeping and to the high-quality equipment implemented in the spraying process.

The equipment used has been selected and refined over years of research and development to improve application efficiency and accuracy while reducing spray drift and the quantity of herbicide used. Firstly, the selection of spray nozzles has been carefully considered to reduce the occurrence of small droplets (<150µm) that are highly susceptible to spray drift. These nozzles are also chosen and fixed for precise directionality to ensure herbicide is only applied where required. Secondly, quantity is applied at a variable rate depending on the speed of the vehicle, ensuring that overapplication does not occur along slower sections of road. Further, the spray boom arm consists of several individually controlled spray nozzles that allow for changing the application width along the road verge depending on the task and local environment.

Team Vegetation provided WSP with a demonstration of their equipment during the interview. WSP was satisfied with the efficacy of the herbicide application as there was no spray drift visible during the demonstration despite the presence of light wind. Additionally, the accuracy of application was precise and evenly spread. WSP is confident that if all contractors engaged by WDC are held to the standards demonstrated by Team Vegetation that the health concerns regarding glyphosate can be reasonably minimised.

4 COMPARISON OF ALTERNATIVES

4.1 GLYPHOSATE COSTS

In Auckland's road corridor, Glyphosate costs an average of **\$562 per km per year**, ranging from \$300-\$779 per km per year depending on site conditions (FYI NZ, n.d.).

4.2 ALTERNATIVE CHEMICALS

Other herbicide compounds are known to be more toxic/ecotoxic than Glyphosate, less effective, and typically cost more so WSP cannot recommend an alternative that can reasonably substitute the efficacy of Glyphosate (Neal & Senesac, 2024). Notably, the lower efficacy of alternative herbicides will necessitate a higher annual frequency of application. This higher frequency will result in greater exposure to applicators and the general public, increasing health concerns compared to Glyphosate. The only option with reported low ecotoxicity include the natural alternatives which are much less effective, more costly, and remain a severe concern to human health. Finally, Glyphosate remains the only effective non-selective herbicide, meaning that switching to alternatives would require the use of multiple different products to achieve a similar broad-spectrum kill. The use of several hazardous chemicals at a higher frequency as a replacement to Glyphosate would potentially be regressive. A summary produced from a 2024 review of alternatives is provided in Table 1.

Table 1: A summary of the advantages and disadvantages of Glyphosate and it's alternatives reported by Neal & Senesac (2024).

Herbicide	Advantages	Disadvantages
Glyphosate	Inexpensive. Rapidly deactivated when in contact with soil. Non-selective (controls most plants). Systemic (travels to roots, preventing reemergence).	Public disapproval. Some negative health effects. Potential carcinogen.
Glufosinate	Effective on annual species. Lower occurrence of non-target contamination	Does not travel to roots (regrowth of perennial species likely)
Diquat	Effective and relatively cheap on <u>small</u> annual species. Spray drift effects not severe.	Large annual and perennial species not killed.
Pelargonic acid	Effective on broadleaf <u>seedlings</u> . Very effective in warm weather. Spray drift will not kill non-target plants.	Large annual and perennial species not killed. Not effective in cold weather. High cost. Less effective than Diquat. Persistent and offensive odour. Severe eye irritant.
Natural Alternatives (Fatty Acids, Vinegar etc.)	Organic and less ecotoxic.	Natural does not mean safe – high dermal toxicity (skin irritant). Does not spread to roots – no long-term kill. Significantly more expensive. Bio-Safe herbicide costs \$1,459 per km per year (FYI NZ, n.d.).

4.3 THERMAL WEED CONTROL

High Pressure Steam (HPS) and Hot Water Treatment (HWT) are two methods of thermal weed control used elsewhere.

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CityCare Whangarei informed WSP that steam treatment is possible but typically must be applied at twice the frequency of Glyphosate and will cost **4 to 6 times more per meter**. Additionally, CityCare has reported that complete implementation of this method could take roughly 3 to 6 months to allow time to invest in the necessary equipment and train staff.

HPS is used in conjunction with regular HWT along a large section of Auckland's North Shore Road corridor. For HPS, the costs equate to **\$1,561 per km per year** whereas HWT would cost **\$2,372 per km per year** if applied at the rate necessary to achieve full control (FYI NZ, n.d.). The cost of HPS reported here is about 3 times the cost of Glyphosate, however, this steam cost is reported as being supplemented by Glyphosate and mechanical treatments, so CityCare's quote of 4-6 times is likely more indicative of the true costs. HPS uses 2000-3000 litres of water per day while HWT uses double this amount which should be considered if water shortages are anticipated (FYI NZ, n.d.). The carbon footprint produced by heating water for both methods has not been quantified but should be investigated if this approach is considered. Ecological impacts include damage to the soil fauna biodiversity. However, impacts on soil fauna will be localised to areas in direct contact with the applied heat. Contrarily, Glyphosate is also known to impact soil biodiversity but also risks runoff and spray drift which could impose a broader extent of non-target damage. Health implications involve the risk of burns and vehicle strike due to operators walking alongside the vehicle within the road corridor (FYI NZ, n.d.). These methods will likely not kill off all roots, so reemergence is likely to be rapid, explaining the suggested frequency being double that of Glyphosate.

4.4 MECHANICAL/MANUAL

Mechanical methods are most effective when combined with other methods such as herbicide or steam (FYI NZ, n.d.). The cost for mechanical only control within the road corridor is estimated to be about **\$2,000 per km per year** (FYI NZ, n.d.). This cost is difficult to estimate due to current implementation of mechanical methods being supplemented by other methods, so costs could be higher for an exclusively mechanical approach. Disadvantages include the transfer of weed fragments and seeds on equipment, spreading invasive species faster than normally expected (Tu et al., 2001). Additionally, mechanical methods will not remove or kill rootstocks which will readily regrow requiring a higher frequency of implementation. Health risks are limited to the operation of machinery as no toxic chemicals are implemented.

4.5 SUMMARY

The above comparison of alternatives demonstrates that Glyphosate remains the most effective and cheapest method for the control of weeds in the urban road corridor. Table 2 summarises the findings.

Table 2: A summary of the findings from Section 4 with costs based on Auckland data.

Method	Cost	Advantages	Disadvantages
Glyphosate	\$562 per km per year	Long-term kill (lower frequency of application). Non-selective.	Public perception. Potential carcinogen.
Alternative Herbicides	\$1,459 per km per year	Some are less ecotoxic. Fewer non-target impacts.	Potentially more harmful to human health. Not non-selective (cannot control all problematic species). Higher frequency of application required due to shorter-term kill.
High Pressure Steam	\$1,561 per km per year	No toxicity/ecotoxicity.	Excess carbon footprint. May need supplementary control in the form of herbicide and mechanical methods. Higher frequency of application required.

Hot Water Treatment	\$2,372 per km per year	No toxicity/ecotoxicity.	Excess carbon footprint. May need supplementary control in the form of herbicide and mechanical methods. Higher frequency of application required.
Mechanical	\$2,000 per km per year	No toxicity/ecotoxicity.	Cost estimate may not be accurate. Higher frequency of application required. May need supplementary control in the form of herbicide application.

5 RECOMMENDATIONS AND CONCLUSIONS

5.1 SUMMARY

Glyphosate has been subject to public condemnation for some time due to known and stipulated health concerns. The use of this herbicide can also impose some serious effects on the natural environment due to spray drift and runoff. Importantly, many of these adverse effects are exacerbated by poor herbicide application methods which may be a result of poor training, lack of stringent safety protocol, or incorrect equipment. This review has found that Glyphosate remains the most effective and cheapest weed control, but health and environmental concerns may justify the selection of a more expensive alternative.

Accordingly, this review presents three options for WDC to consider. (1) If Glyphosate use is continued, several recommendations are suggested in 5.2 to ensure that safe and efficacious application is adhered to. (2) Several alternative weed control methods are provided in 5.3 including indicative prices compared to Glyphosate. (3) Alternatively, Glyphosate use could be reduced but not entirely replaced by supplementing with the alternative methods to evaluate their effectiveness.

5.2 GLYPHOSATE RECOMMENDATIONS

If Glyphosate use is continued, the following recommendations should be implemented to ensure safe use of this hazardous chemical:

1. Contractors should be paid for standby time if safety requirements temporarily halt spraying activities (e.g., pedestrians using a stretch of path). This potential extra cost should be considered as an investment towards public health and assurance of care afforded to the safe use of hazardous chemicals.
2. A minimum spraying distance upwind of people or animals should be specified. With sufficient spray drift controls in place (see recommendation 3) 10 meters could be sufficient. This could include exclusion zones in the form of signage and greater supervision to exclude public.
3. The current contractor's vehicle appears to have the spray wand fixed sufficiently close to the ground which should minimise spray drift. The Specification should still define a maximum height that herbicide can be sprayed above the ground to ensure that any change in contractor or equipment is held to the current standard. The Specification should also require that the proportion of droplets less than 100µm is kept to a minimum as these smaller droplets contribute disproportionately to spray drift (Arvidsson et al., 2011). A suggested acceptable percentage of droplets below 100µm could be <10%. Droplet size is determined by spray nozzle design so may require a change in equipment. Additionally, the use of adjuvants can help increase droplet size (Basílio et al., 2024).
4. Temporary signage erected in parks during spraying may need to remain for a longer period to give sufficient time beyond the current drying period for Glyphosate to break down or be washed off by rain.
5. If any structures (culverts, water tables, etc.) are known to feed into a receiving aquatic ecosystem (including but not limited to streams, rivers, wetlands, ponds or lakes) Glyphosate should not be used due to the severe impacts known to these environments (Evalen et al., 2024; Klátyik et al., 2024).

Additionally, the high standards demonstrated by Team Vegetation (Section 3) should be expected of any contractors hired to spray Glyphosate.

5.3 SUGGESTED ALTERNATIVES

If Glyphosate use is discontinued (or reduced), the following alternatives are summarised with advantages, disadvantages and costs to aid in decision making (Table 3). It is noted that alternative herbicides are not recommended as a complete substitute for Glyphosate due to alternatives typically being a more severe hazard to human health while also being less effective.

Table 3: A summary of the findings from Section 4 with costs based on Auckland data.

Method	Cost	Advantages	Disadvantages
Glyphosate	\$562 per km per year	Long-term kill (lower frequency of application). Non-selective.	Public perception. Potential carcinogen.
Alternative Herbicides NOT RECOMMENDED	\$1,459 per km per year	Some less ecotoxic. Non-target impacts fewer.	Potentially more harmful to human health. Not non-selective (cannot control all problematic species). Higher frequency of application required due to shorter-term kill.
High Pressure Steam	\$1,561 per km per year	No toxicity/ecotoxicity.	Excess carbon footprint. Needs supplementary control in the form of herbicide and mechanical methods. Higher frequency of application required.
Hot Water Treatment	\$2,372 per km per year	No toxicity/ecotoxicity.	Excess carbon footprint. Needs supplementary control in the form of herbicide and mechanical methods. Higher frequency of application required.
Mechanical	\$2,000 per km per year	No toxicity/ecotoxicity.	Cost estimate may not be accurate. Higher frequency of application required. May need supplementary control in the form of herbicide application.
No Treatment NOT RECOMMENDED	Indirect costs e.g.: Increase in staff time handling ratepayer complaints concerns	No toxicity/ecotoxicity.	Not treating the problem. Not applicable everywhere. Increased risks to public arising from problematic plants and weeds blocking and obscuring access and sightlines. Loss of local aesthetics. Increase of invasive and pest species which displace NZ natives.

6 APPENDIX A

A summary of Glyphosate stances across New Zealand councils. Councils in **bold** have approaches that may be worth some consideration by WDC.

Regional	Council	Notes
Northland	Far North District Council	Review of alternatives to Glyphosate found that costs would be about 6 times more expensive (Rokobigi, 2024). Contractor trialling alternative herbicides (Soil and Health Association, n.d.).
	Kaipara District Council	Glyphosate is used, no evidence of considering alternatives.
	Whangarei District Council	5% of roadside controlled by mechanical mowing and reserves are 80% controlled with Glyphosate (Soil and Health Association, n.d.). Compare to Waipa District Council below
	Northland Regional Council	Glyphosate is used, no evidence of considering alternatives.
Auckland	Auckland Council	<p>Some boards are using thermal and mechanical methods which is more expensive and has higher carbon emissions due to heating methods (Auckland Council, 2020). Mechanical control is 3 times more expensive and thermal control is 3-6 times more expensive per meter in parks or the road corridor (Auckland Council, 2021).</p> <p>The council did reconsider Glyphosate use but has continued (RNZ, 2017). Later the council has considered increasing Glyphosate use for cost purposes (Dillane, 2020).</p> <p>The Auckland Council also reported that alternative herbicides cost more and require greater quantities to be as effective as Glyphosate (Auckland Council, 2021).</p>
Waikato	Hamilton City Council	Uses Glyphosate (Hamilton City Council, n.d.). No further information available on stance.
	Hauraki District Council	No information available. Likely uses Glyphosate.
	Matamata-Piako District Council	Trialling no spray areas (Soil and Health Association, n.d.).
	Otorohanga District Council	"Spraying of open drains is becoming less socially acceptable in urban areas" (Otorohanga District Council, 2021).
	South Waikato District Council	Investigating the use of alternatives (Soil and Health Association, n.d.).
	Taupo District Council	Glyphosate is used, no evidence of considering alternatives.
	Thames-Coromandel District Council	Spraying in shopping areas is only done <u>before</u> 7am, and for residential areas spraying must be completed <u>before</u> 3am (Soil and Health Association, n.d.).

	Waikato District Council	Not considering spray-free options (Soil and Health Association, n.d.).
	Waikato Regional Council	Not responsible for maintaining areas used by the public (Soil and Health Association, n.d.).
	Waipa District Council	<u>95%</u> of roadside vegetation is controlled by <u>mechanical</u> mowing (Soil and Health Association, n.d.).
	Waitomo District Council	Uses Glyphosate. No indication of using alternatives (Soil and Health Association, n.d.).
Bay of Plenty	Tauranga City Council	Uses Glyphosate. Maintains 21 Glyphosate-free reserves (Tauranga City Council, n.d.)
	Rotorua Lakes Council	Petition against council to stop the use of Glyphosate (Dawson, 2016). Some natural sprays and mechanical control is used (Soil and Health Association, n.d.).
	Kawerau District Council	No information available. Probably uses Glyphosate.
	Opotiki District Council	Not considering alternatives. 85% of weed control is with herbicide (likely Glyphosate) and 15% is mechanical (Soil and Health Association, n.d.).
	Whakatane District Council	Following EPA guidelines (Soil and Health Association, n.d.).
	Western Bay of Plenty District Council	Mechanical methods main approach used in reserves (Soil and Health Association, n.d.).
	Bay of Plenty Regional Council	Not responsible for maintaining areas used by the public (Soil and Health Association, n.d.).
Gisborne	Gisborne District Council	Agrees with Morini (2018) that risk of exposure at carcinogenic levels is unlikely when following correct protocol (Cave, 2021).
Hawkes Bay	Central Hawkes Bay District Council	Some mechanical control in more public spaces (Soil and Health Association, n.d.).
	Hastings District Council	Glyphosate is used, no evidence of considering alternatives.
	Napier District Council	Uses Glyphosate. Does not use alternatives due to efficacy and notes that steam methods also damage soil biota (Soil and Health Association, n.d.).
	Wairoa District Council	20-30% of reserve weeds are controlled by mechanical means (Soil and Health Association, n.d.).
Taranaki	Taranaki Regional Council	Has been reducing Glyphosate use for 20 years (Taranaki Regional Council, 2021). Other options not viewed as financially viable.

	New Plymouth District Council	Alternatives are used where plausible but spray free areas have not been considered (Soil and Health Association, n.d.).
	South Taranaki District Council	Public areas are <u>spot-sprayed only</u> (Soil and Health Association, n.d.).
	Stratford District Council	Glyphosate is used, no evidence of considering alternatives.
Manawatu-Wanganui	Horizons Regional Council	Glyphosate is used, no evidence of considering alternatives and council not responsible for areas used by public (Soil and Health Association, n.d.).
	Horowhenua District Council	Glyphosate is used, no evidence of considering alternatives. High profile areas are hand weeded (Soil and Health Association, n.d.).
	Ruapehu District Council	Roadsides sprayed twice per year (Ruapehu District Council, 2023). Only uses Organic Biosafe in CBD areas (Soil and Health Association, n.d.).
	Palmerston North District Council	No information available. Likely uses Glyphosate.
	Manawatu District Council	Glyphosate is used, alternatives are not used or considered as of 2019 (Manawātū District Council, 2019). Herbicide sticker is used when spraying <u>near aquatic ecosystems</u> to improve adhesion to the sprayed plants (Manawātū District Council, 2019).
	Rangitikei District Council	Mechanical control used in 25-35% of situations (Soil and Health Association, n.d.).
	Tararua District Council	No information available. Likely uses Glyphosate.
Wellington	Whanganui District Council	Alternatives have not satisfied safety and practicality concerns (Soil and Health Association, n.d.).
	Carterton District Council	Uses Glyphosate. Alternatives would be too expensive, using lower concentration in mixture with other herbicides (Wairarapa Times-Age, 2018).
	Kapiti Coast District Council	Uses Glyphosate. Trials alternatives when they become available, finding that they tend to only kill emergent foliage with roots surviving to resprout (Kapiti Coast District Council, 2021).
	Greater Wellington Regional Council	Concerned that if Glyphosate was no longer available, the alternative herbicide options are more harmful, persist for longer, and more expensive/ineffective (Greater Wellington Regional Council, 2021).
	Hutt City Council	Glyphosate is used, no evidence of considering alternatives. Steam used infrequently but <u>preparing to increase</u> use if regulations on Glyphosate change (Soil and Health Association, n.d.).
	South Wairarapa District Council	Glyphosate is used, no evidence of considering alternatives.

	Masterton District Council	Uses Glyphosate. Exploring other options (Wairarapa Times-Age, 2018).
	Porirua City Council	Uses Glyphosate. Has considered changing to alternatives over the years but Glyphosate remains the most effective method so is continued in accordance with the stance of the EPA (Soil and Health Association, n.d.).
	Upper Hutt City Council	Glyphosate is used sparingly, and hand weeding is used where possible (Soil and Health Association, n.d.).
	Wellington City Council	Uses Glyphosate. No suitable alternatives available (Jones, 2021).
Nelson	Nelson City Council	Some mechanical control is done and mulching used to limit chemical use (Soil and Health Association, n.d.). Reviewing use of Glyphosate due to concerns raised by public (Jones, 2021).
Marlborough	Marlborough District Council	Calls to ban in 2020 (RNZ, 2020). Actions have been taken to reduce use in public spaces (Hart, 2022).
Tasman	Tasman District Council	No viable alternatives are as effective as Glyphosate (Soil and Health Association, n.d.).
Canterbury	Ashburton District Council	Glyphosate is used, no evidence of considering alternatives.
	Christchurch City Council	Halted Glyphosate use 6 years ago and in 2022, weed control costs had increased 4.5 times (NZ EPA, 2022).
	Environment Canterbury	Environment Canterbury does not manage areas frequented by the public (Soil and Health Association, n.d.).
	Hurunui District Council	Glyphosate is used, no evidence of considering alternatives.
	Kaikoura District Council	Glyphosate is used, no evidence of considering alternatives.
	Mackenzie District Council	No information available.
	Selwyn District Council	No information available.
	Timaru District Council	Alternatives to Glyphosate were considered but no action was taken (Timaru District Council, 2024).
	Waimakiriri District Council	Found that spraying of some drainage structures could be <u>eliminated</u> entirely by planting with <u>native plants to outcompete weeds</u> (Allen, 2020). For the majority of drains, mechanical control is implemented (Soil and Health Association, n.d.).
	Waimate District Council	No information available.

West Coast	Buller District Council	Glyphosate is used, no evidence of considering alternatives.
	Grey District Council	30% of footpaths maintained by mechanical methods (Soil and Health Association, n.d.).
	West Coast Regional Council	No information available.
	Westland District Council	No information available.
Otago	Central Otago District council	Glyphosate is used, no evidence of considering alternatives.
	Clutha District Council	Glyphosate is used, no evidence of considering alternatives.
	Dunedin City Council	An 8-7 vote from councillors determined Glyphosate will continue being used in the city (Scott, 2023).
	Otago Regional Council	Conducts an <u>audit 2 weeks post-spraying</u> to check for spray drift and effectiveness of application (Soil and Health Association, n.d.).
	Queenstown Lakes District Council	Conducting a review on options for minimising or eliminating the use of Glyphosate due 2025 (Queenstown Lakes District Council, 2022). Trialling natural fatty acid spray (Soil and Health Association, n.d.).
	Waitaki District Council	Tried alternatives which were not effective (NZ EPA, 2022). Has some no spray areas that are maintained mechanically (Soil and Health Association, n.d.).
Southland	Environment Southland	Mechanical Weed Control Carried out in drainage networks (Soil and Health Association, n.d.).
	Gore District Council	10-20% of amenity gardens managed by hand weeding (Soil and Health Association, n.d.).
	Invercargill City Council	Roadside spraying twice per year (Invercargill City Council, n.d.). Glyphosate is <u>not used on roads or footpaths</u> , only some use in parks (Soil and Health Association, n.d.).
	Southland District Council	Glyphosate is used, no evidence of considering alternatives.
Chatham Islands	Chatham Islands Council	Glyphosate is used, no evidence of considering alternatives.

7 LIMITATIONS

This report ('Report') has been prepared by WSP New Zealand Limited ('WSP') exclusively for Whangārei District Council ('Client') in relation to a review of the continued use of Glyphosate and an investigation of alternatives ('Purpose') and in accordance with the Short-form Agreement with Whangārei District Council dated 27/11/2024 ('Agreement'). The findings in this Report are based on and are subject to the assumptions specified in the Report. WSP accepts no liability whatsoever for any use or reliance on this Report, in whole or in part, for any purpose other than the Purpose or for any use or reliance on this Report by any third party.

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2.2 UNESCO City of Art and Culture – Opportunity for Whangarei

Meeting:	Council Briefing
Date of meeting:	10 July 2025
Reporting officer:	Victoria Harwood, General Manager Community Services Olivia Garelja, Director Creative Northland

1 Purpose / Te Kaupapa

To provide information to councillors on the opportunity for Whangarei to be nominated for a UNESCO City of Art and Culture status and seek the council's support for the application which Creative Northland will lead with support of Northland Inc. and Council.

2 Background / Horopaki

The primary purpose of establishing Whangārei as a UNESCO City of Art and Culture is to spotlight and promote Whangārei as a key destination for craft and folk art, while simultaneously leveraging opportunities for funding and growth, leading to economic development for the region.

Given there is only one designation left in Aotearoa to be attained, Whangārei has a great opportunity to join the other New Zealand designated cities: Dunedin: Literature, Whanganui: Design, Auckland: Music and Wellington: Film.

In addition, establishing Whangārei as a UNESCO City of Art and Culture allows full access to providing vital links into the wealth of opportunities that UNESCO offers. For example, new global relationships that foster collaboration and exchange between cities with shared cultural and artistic values. These partnerships can involve a wide range of activities, such as artistic collaborations, cultural events, and exchange programs for artists and cultural professionals, all leading to ongoing Global recognition for Whangārei and can be funded through non-for-profit organisations.

Furthermore, as this is the last designated chance for a New Zealand city to apply for this specific UNESCO opportunity, it is vital that Whangārei has Council-backed approval for this pathway to be undertaken by Creative Northland to prepare Council for the submission, which is due by the end of 2026.

The timeframe to be approved to reach the goal:

Process/Task	Timeline	Responsibility
1. To obtain council support for the application	June–August 2025	Council staff and Creative Northland
2. Set up working group & start application framework	2025–early 2026	Creative Northland
3. Host UNESCO delegates	Mid 2026	Creative Northland, Northland Inc, Council
4. Finalise and submit application	Late 2026	Council (authored by CN)
5. Prepare to activate post-designation plan	2027+	Creative Northland + partners

UNESCO is an acronym that stands for the United Nations Educational, Scientific and Cultural Organisation. It's a specialised agency of the United Nations, which is dedicated to promoting education, science, culture, and communication to foster peace and equality worldwide.

UNESCO City of Art and Culture – This is the application Whangarei would be looking to apply to. UNESCO provides global designation status to cities around the world, recognising cultural and heritage excellence in the field of craft and folk art, and this includes indigenous crafts (Māori & Pakeha). This designation will also support the national trend of the Recent Creative Economy GDP: Year to March 2022: NZD \$14.9 billion, Year to March 2023: NZD \$16.3 billion (4.3% of GDP) and Year to March 2024: NZD \$17.5 billion (4.2% of GDP).

The application process for this UNESCO designation for craft and folk art must be initiated by Council, however the Creative Northland Director, backed by the Creative Northland Board, can provide the framework and submission details to ensure the best opportunity for a successful application. It is vital the Whangārei submission is backed as soon as possible to allow Creative Northland progression on preparing the submission as the only opportunity to submit is at the end of 2026 where the submission process has a 3-month window however strategic work needs to be done leading up to the submission by Creative Northland. Other applications from New Zealand include Nelson.

Whangārei's eligibility to apply for this UNESCO opportunity is backed by a rich and documented history of Art and Culture derived from both indigenous Māori and colonial settlers. This rich multicultural heritage continues to influence the art and culture of our region and puts us in a good position, providing us with a positive point of difference. Whangārei's renowned craftspeople are also innovators, as they continue to elevate local traditions into nationally and globally recognised artforms. Sir Michael Hill is a perfect example of craft meeting enterprise, but Whangārei is also home to deep intergenerational practices of Māori and Pacific craft, currently exemplified at Hihiaua Cultural Centre, as well

as pioneering Pākehā artisans like Yvonne Rust (Quarry Arts Centre Pioneer) and countless others. Together, they reflect the diversity and depth of craft in Whangārei - making a strong case for UNESCO Craft & Folk Art designation. Furthermore, Whangārei is also a perfect fit for the values of UNESCO's Craft & Folk Art designation, which are: innovation, tradition, sustainability, and cultural identity.

Creative Northland in response to early strategic planning around this aspiration for Whangārei has already engaged with Community Development, District Development, Strategic Planning, Northland Inc and some Councillors to date.

3 Discussion / Whakawhiti kōrero

The potential value of this designation is outlined below, including:

3.1 Economic Development:

Whangārei's designation as a UNESCO City of Craft and Folk Art will act as an economic catalyst. Thus, elevating cultural tourism, growing local enterprise, and unlocking new investment streams through creative industries. This aligns with New Zealand's growing creative economy, which reached \$17.5 billion in 2024, contributing 4.2% of GDP.

3.2 Cultural Elevation:

This opportunity affirms and uplifts the cultural identity of Whangārei by recognising the deep intergenerational practices of Māori, Pacific, and Pākehā craft traditions. It places local artisans on an international stage while celebrating the region's living heritage and creative depth.

3.3 Increased Visibility (Global Recognition):

UNESCO designation brings immediate global visibility, placing Whangārei alongside a network of international cities known for cultural and artistic leadership. Through UNESCO's own collective of Sister City partnerships/ ecosystem and cultural exchanges, it positions Whangārei as a recognised creative destination and centre of excellence. **Please note this is separate from current council sister cities.*

3.4 Point of Difference – Centre of Multicultural Excellence:

Whangārei's rich multicultural heritage—rooted in both Māori and settler craft traditions—is our strength. It offers a unique, authentic point of difference, positioning the city as a national leader in bicultural and multicultural excellence in the arts.

3.5 UNESCO - A Proven Template: The UNESCO Creative Cities Network offers a globally tested framework for cities to scale their creative potential. It strengthens cultural diplomacy, encourages sustainable development, and provides a roadmap to grow Whangārei's international footprint through arts, education, and innovation. UNESCO has documented evidence that the establishment of sister city relationships raise the profile of a city as a centre of creativity, attracting both local and international talent and visitors. This initiative will be highly significant in shaping Whangārei's identity and positioning it as a centre of creative excellence. A 6-step plan on how to get there and plan of what comes after is being developed.

3.6 Impact on Council's Direction:

Aligns strongly with Council's cultural development goals and Whangārei's existing strategies

and the Arts, Heritage and Culture strategy. It positions the city as a national leader in creative sector innovation, craft and folk art in Aotearoa.

3.7 Level of Service:

Providing global recognition, new opportunities for collaboration, and a framework for strengthening arts infrastructure for the region. It does not remove or reduce any current service levels but provides leverage for increased funding investment from the likes of Foundation North, Ministry of Culture and Heritage and Creative NZ.

3.8 Level of Public Impact/Interest:

The global recognition should attract High public interest and benefit through community, artist elevation, increased visitation, cultural tourism, and international engagement. Engagement will include local artists, iwi/hapū, youth, those with disability and the general public.

3.9 Impact on Council's Capability (Non-Cost):

Minimal operational impact. Existing partnerships (Creative Northland, Quarry Arts Centre, Hihiaua, Hundertwasser Art Centre, Whangarei Art Museum etc.) will help drive delivery, with potential to attract external funding and international partnerships.

3.10 Net Financial Cost/Revenue:

Low upfront investment relative to long-term benefits. Likely to result in increased economic activity through cultural tourism, international artist exchanges, and investment opportunities. Opportunities to leverage national funding (e.g., CNZ, British Council, MCH) and philanthropic support.

3.11 Engagement Spectrum:

This initiative sits at the "Collaborate" to "Empower" end of the spectrum. A framework will be co-developed with creative sector leaders, hapū/iwi partners, and community stakeholders to ensure the designation is understood and supported by the community to ensure a successful engagement legacy and benefits.

In summary, UNESCO Creative Cities often brand themselves as global hubs of creativity. This initiative would be highly significant in shaping Whangārei's identity and positioning it as a centre of creative excellence. Therefore, the backing of Council is essential in realising the long-term benefits this designation can bring to our region socially, culturally, and economically.

4 Financial/budget considerations / Ngā pānga pūtea/tahua

There are no immediate or unbudgeted financial impacts to provide the support and apply. Creative Northland is undertaking the cost of this as part of general operation to advance the sector in the region, but also nationally and internationally.

Any future budget requirements will be brought through formal Council channels as part of a 4-year phased implementation plan post-designation (2027 onward). No significant financial outlay is expected from Council at this stage, just an awareness that, if successful with this designation, dedicated branding would have to take place for the city as a recognised UNESCO destination. Dedicated branding would be required to be coordinated by council departments including District Development (whom conversations have already started) and communications with Northland Inc and further elevated by the Venues and Events department around events, (Events are already aware of this aspiration). Branding examples for other areas are in *Attachment 1*.

Creative Northland with Councils support in partnership with Northland Inc would be required to host the UNESCO delegates closer to mid-2026 ahead of the submission: This includes accommodation covered by Northland Inc and a guided itinerary created by Creative Northland's Director with input from council, then subsequently led by a council member/ and or standing mayor.

The proposed UNESCO Creative Cities Network designation initiative is designed to be fiscally responsible with high return on cultural, reputational, and economic value.

Key financial considerations include:

- Accommodation costs covered by Northland Inc
- A guided cultural itinerary coordinated through Creative Northland's Director with council input, and led in conjunction by a delegated council representative or the standing Mayor (This can link into sister city framework of cultural exchange)
- Future costs (if designation is successful) could be scoped in collaboration with national funders (e.g. CNZ, MBIE, MFAT), philanthropic partners, and existing arts infrastructure.
- Marketing costs post 2027

In summary, the marketing potential of this designation amplifies our local stories, grows new audiences, and supports product-development pipelines from studio to storefront.

5 Significance and engagement / Te Hira me te Arawhiti

The decisions or matters of this Agenda do not trigger the significance criteria outlined in Council's Significance and Engagement Policy, and the public will be informed via agenda publication on the website

6 Attachments / Ngā Tāpiritanga

Attachment 1 - Examples of branding in Whanganui UNESCO City of Design

Examples of Branding



2.3 Whangarei Events Strategy 2025 – 2030

Meeting: Council Briefing
Date of meeting: 10 July 2025
Reporting officer: Bea Mossop, Manager Venues and Events

1 Purpose / Te Kaupapa

To present the *Whangārei Events Strategy 2025 –2030* to Elected Members for information and discussion.

The Strategy provides an updated framework for delivering a sustainable, inclusive, and vibrant events program that celebrates local identity, enhances community well-being, and contributes to Whangārei’s social, cultural, and economic life.

2 Background / Horopaki

The previous Experience Local Whangārei Events Strategy 2019–2024 guided the delivery of events that strengthened community connection and civic pride. Building on this foundation, the reviewed and updated Whangārei Events Strategy 2025–2030 incorporates updated priorities, sector feedback, and lessons from recent years.

Key updates include the addition of a fifth “Experience Local” Celebrate Local lens alongside Taste, Explore, Play, and Connect. The Strategy also places greater emphasis on sustainability, capacity building, and partnerships to grow Whangārei’s reputation as a leading events destination.

3 Discussion / Whakawhiti kōrero

The Strategy sets out four core objectives:

1. Provide measurable evidence of customer experience and local pride
2. Showcase how venues and events promote the district
3. Deliver consistent regulatory support for events
4. Enable events and venues that celebrate diverse cultures and are accessible to all

And outlines key actions to support these objectives, including:

- Ensuring quality and appropriate venues as a foundation for events
- Strengthening community engagement and cultural integration

- Embedding sustainable practices across the sector, including staff development, technical training, and improved event operations
- Providing platforms for local talent, theatre, and arts
- Supporting the development of new events that reflect the district's identity and values
- Reducing event-related waste and promoting environmental responsibility
- Fostering partnerships with local businesses, hapū, creative communities, and the wider events sector

Performance will be monitored via key indicators such as event satisfaction, waste diversion, audience development, and regulatory service delivery.

The strategy will be brought for adoption by council to the July Council meeting.

4 Financial/budget considerations / Ngā pānga pūtea/tahua

The delivery of the Whangārei Events Strategy 2025–2030 is aligned with existing budgets within the Events and Venues operational and capital work programs as outlined in the *2024–2034 Long Term Plan*.

No additional funding is required at this time.

5 Significance and engagement / Te Hira me te Arawhiti

The matters covered in this briefing do not trigger the significance criteria outlined in Council's *Significance and Engagement Policy*. The public will be informed of the adoption of the Strategy via publication on the Council website, Council News, and through Council's social media channels.

6 Attachments / Ngā Tāpiritanga

The Whangareai Event Strategy 2025 -2030

EVENTS STRATEGY

2025-2030

CONTENTS

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EXECUTIVE SUMMARY

This strategy sets a framework for developing events that elevate our community and amplify the value of local and is supported by the delivery of Council's ambitions as articulated in 2024 – 2034 Long Term Plan.

Creating positive experiences is crucial for the success of any event, and this is achieved by supporting the community to deliver accessible events. Local experiences foster a connection between individuals and the unique aspects of a place. Our strategy aims to redefine the concept of 'events' in the Whangārei District, emphasising the benefits of events.

Our primary focus and decision-making processes are designed to empower local communities and measure our successes. The impacts we aim to achieve through event investments are geared towards a positive future for our community, making the Whangārei District a great place to live.

We aim to maximise the value of local identity as a crucial element of Whangārei's narrative and success. This includes building our capability, retaining and attracting exceptional local talent, and enhancing connections among hapu, individuals, communities, businesses and venues.

By embracing core principles for events and community activations, we promote equitable access, environmental sustainability, and economic growth, empowering communities to host events that celebrate diverse identities. These gatherings not only strengthen our local economy but also foster a resilient, self-sufficient community. Our pride in being local is evident in our festivals, markets, and community events that unite us, showcasing the best of what our community has to offer.

This Strategy intends to deliver four key strategic objectives

1. Provide evidence of customer experience and proud to be local (through service delivery)
2. Deliver understanding of what the Venue and Events department does to promote, contribute and showcase our district.
3. Deliver regulatory event support for events
4. Provide events and venues that celebrate our diverse cultures and are accessible to all.

Key messaging is aligned with the Long-Term Plan 2024-2034 Community Outcomes

Our venues and events make an important contribution to the social, cultural, and economic wellbeing of our community:

- Thriving local identity
- Diverse and inclusive culture
- A great place to call home
- Sustainable and resilient future
- We measure the benefits of our council supported events and festivals for our district.

Key actions allocated to the strategic objectives

A strategy for sustainable, resilient, and inclusive events

01

Quality and appropriate venues

- Essential for hosting events that boost cultural and economic well-being.
- Facilitate a wide range of events that promote and celebrate our culture.

02

Community engagement

- Events bring communities together.
- Celebrate diverse performances, art, sports, and social activities.

03

Cultural integration

- Strengthen relationships with tangata whenua.
- Integrate Te Reo and Te Ao into event development.
- Show leadership in expressing Manaaki and accessibility.
- Encourage respect and generosity to support diverse local communities.

04

Inclusion and diversity

- Advocate for inclusion through diverse event offerings.
- Ensure spaces for fringe events to celebrate diverse cultures.
- Promote equity and diversity through council-community partnerships.



05

Sustainability practices

- Uphold and protect local environments and waterways.
- Minimize event waste and promote sustainable practices.
- Regenerate local environments through eco-friendly events.

06

Community engagement

- Enhance accessibility, capability, capacity, and connection.
- Build knowledge through diversity and equity opportunities.
- Foster positive associations between Council and community.

07

Continuous improvement

- Develop knowledge to support events and event-makers.
- Focus on understanding the cost, value, and impact of events.
- Use data to improve future events and support systems.

08

Measuring impact

- Assess how events contribute to growth and well-being.
- Use data to improve future events and support systems.

By implementing these strategies, we aim to create a vibrant, inclusive, and sustainable event landscape that celebrates and supports our diverse communities.

In a 2024 survey of residents, 92% of residents recognised provision of local events as a Council service.

WHERE WE ARE TODAY

Our community collaborations, including festivals, are designed to showcase and highlight our district's talents and rich cultural tapestry. The Venue and Events Department connects with the community through free events that grow local confidence and pride of place.

By investing in major events like the Women's Rugby World Cup played in 2022 and the Hockey Oceania Cup in 2023 we stimulate economic development and attract global visitors. Our events unite local entrepreneurs and businesses through conferences and business events, significantly contributing to the local economy. Our venues and event spaces play a key role in hosting community, cultural festivals, conferences, and sporting events



Local Confidence

- Grow local confidence and pride of place
- Enhance Whangārei's place-identity and destination profile
- Contribute to an authentic and distinctive point of difference - Our Unique Whangārei story



Local Capability

- Build local capability to develop and sustain events District wide
- Develop opportunities for local innovation and entrepreneurship
- Activate and enable local talent and creative communities



Local Connection

- Increase local participation and engagement in community events
- Promote and celebrate community cohesion, local diversity, and inclusion for all
- Leverage the reciprocal exchange between locals and visitors

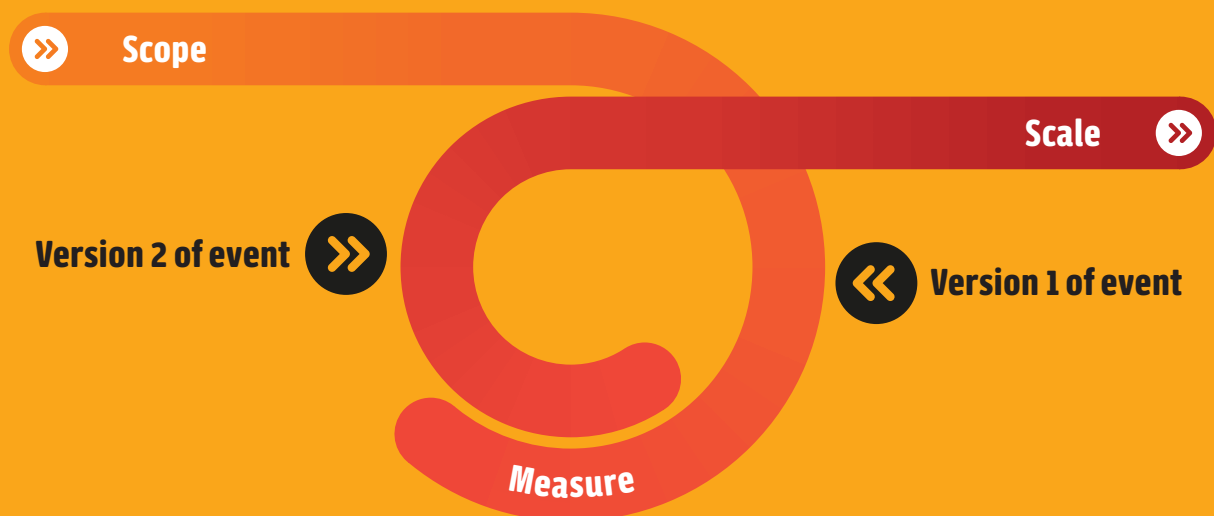
EYE TO THE FUTURE

Enhancing sector collaboration and leveraging opportunities

By adopting a future-focused generative planning cycle, we can proactively foster collaboration across the sector. Developing comprehensive measurement tools will enable us to better understand success metrics and audience trends, allowing for the continuous adaptation and evolution of our events.

The cycle requires events to be viewed in a recurring cycle with the motivation to evolve the concept through evaluation and adaptation.

Know how



Scope Vision + Trajectory

Goal setting, initial planning, and funding application.

»» Delivery and debrief of Version #1 of event.

Measure Assess + Evaluate

Evaluation of impact and success, adaptation, and decision to proceed.

»» Delivery and debrief of Version #2 of event.

Scale Evolve + Grow

Legacy planning, identification of growth areas and sponsorship/partnerships.



Investing in us

Events in the Whangārei District leverage the strengths and capabilities across Council functions working with community and external stakeholders. This collaboration empowers diverse communities to develop, showcase, and celebrate local capabilities while fostering connections.

Priorities

- Council is resourced to develop and support local events and festivals.
- Community organisations are empowered and supported to contribute to local festivals and events.
- Connect and support local talent and creative communities (including showcasing our world-class talent to build local confidence and pride
- Support event development and event growth across the district
- Encourage cross-sector collaboration and partnerships
- Support and strengthen the role of our local venues in the district's event ecosystem

Local world-class talent: Tim Southee (cricketer), marine industry (world leading yachting innovation), Cindy Kiro (Governor General of New Zealand since 2021), Rachel House (actor), Stacey Michelsen (Black Sticks) and Ian Jones (former All Black).



EXECUTING THE STRATEGY

Experience Local



**Taste
Local**



**Connect
Local**



**Explore
Local**



**Play
Local**

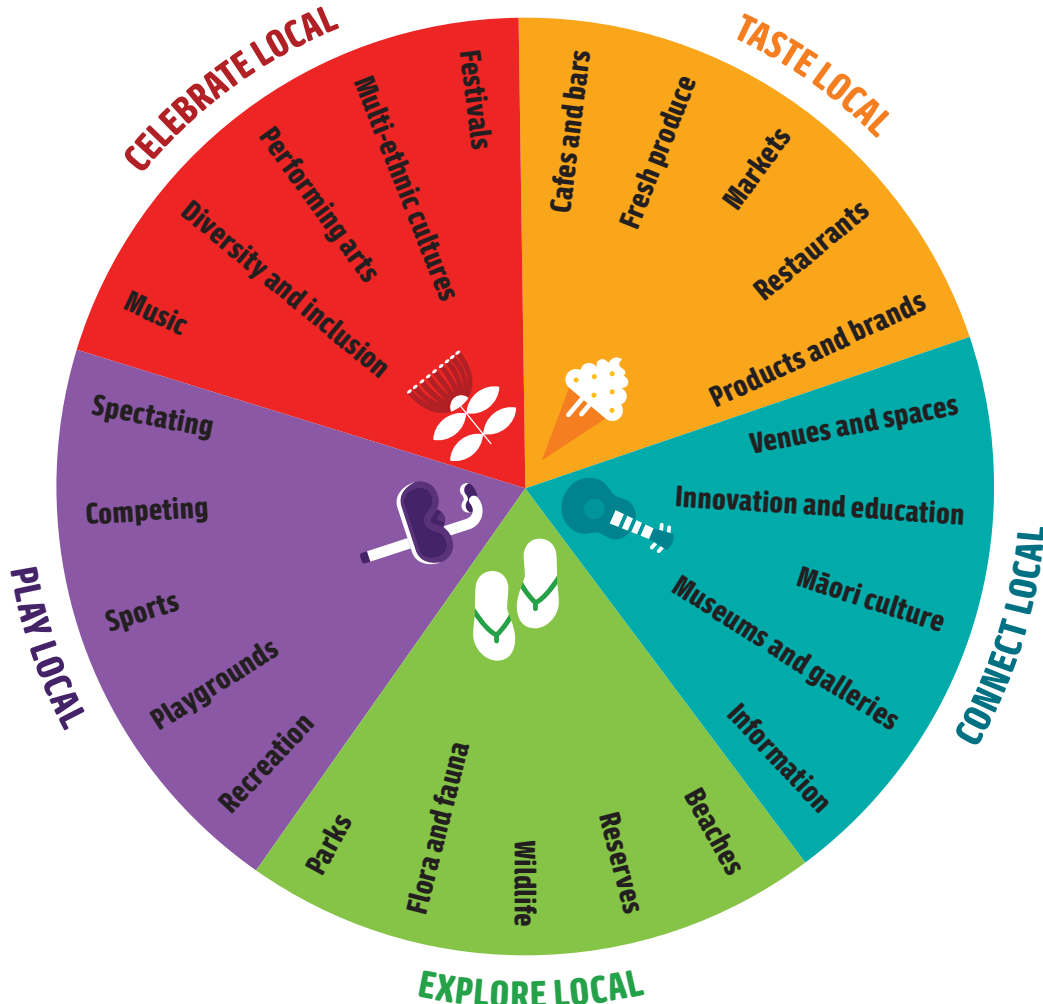


**Celebrate
Local**

The Experience local lens invites and inspires participation with local Whangārei people, places, and activities. The framework invites people to Experience local, taste our local flavours, explore our natural environment, connect with our culture, play, and participate in local recreation and sports. Our goal is to programme two, or more, of the five local experience categories into each event.

This system will:

- inspire and motivate the sector to develop multiple and varied local experiences within events
- inform a framework to evaluate and organise prospective and existing events
- promote and communicate the diversity and value of local events for wider audience appeal
- provide a platform for engagement and public feedback.



Positioning

To complement the adoption of this strategy the following series of directives are advised.

Proactive and connected Council

By front-footing events programming, the Council will call for proposals and collaborate with event partners based on a clear future schedule. This approach aims to focus energy and investment on seasonal programming and opportunities to grow tourism throughout the year.

Expanding community reach through outreach Initiatives

Working with community groups across the district to engage our remote audiences for major events, to foster cross-district collaboration.

Leveraging opportunities

We aim to develop and grow economic event activities by leveraging opportunities in film, television, and event development.

Encourage accessible and inclusive events

We will continue to encourage event opportunities that cater for all.

Outcomes for event types

Major events

- Event generates significant district and/or region wide benefit – both social and economic.
- Generates significant national and/or international profile.
- Involves large audiences more than 10,000 people.
- Event may not be unique to the city and may be able to be replicated.
- Event can be a one-off.

OUTCOMES OF MAJOR EVENTS

- Primary driver is economic impact.
- Economic return of 4:1 or greater.
- Contributes to three or more key strategic principles.



Council events

- Developed and delivered by Whangarei District Council.
- Targeted appeal to attract larger audiences and community involvement.
- Attracts visitors from outside of the district as well as residents.

OUTCOMES OF COUNCIL EVENTS

- Events generate district benefits.
- Generates media awareness.
- Major contributor to the city's vibrancy and identity.
- Has wide appeal with social and/or economic outcomes.
- Contributes to two or more key strategic principles.

Community events

- May be sponsored by, or receive grant from, Whangarei District Council.
- Community-led requiring local input and ownership.
- Targeted at a niche part of the community or geographic area.
- Event can be a one off and not be unique to the district.
- Event is often not for profit.

OUTCOMES OF COMMUNITY EVENTS

- Contributes to a shared sense of local community, pride, and identity.
- Primary drivers are social and economic.
- Provide support for local artists, performers, craftsmen.



Evaluation

To better understand the impact of our events strategy over time, we will utilize a combination of qualitative and quantitative indicators. These indicators will help us measure our effect on local people, businesses, the events themselves, and our place.

Key performance indicators

Our venues and events will deliver the outcomes of the Experience Local: Whangārei Events Strategy and will provide for customer satisfaction.

Performance Measure	Year 1 2024-25 target	Year 2 2025-26 target	Year 3 2026-27 target	Years 4-10 2027-34 target
Percentage of Council delivered events that include two or more of the local experience categories (as per the strategy).	100%	100%	100%	100%
Regulatory support for events across our District. Requests submitted via our operational request dashboard to be successful completed in a timely manner. Measured monthly by the operational request dashboard: Reported in the community operational report.	≥80%	≥80%	≥80%	≥80%
Attracting, growing, and sustaining loyal audiences to events and satisfaction with the venues. Measured via the Audience Participation Survey – result is the average across all sampled events through the year.	≥60%	≥63%	≥65%	≥70%

MILESTONES AND KEY ACTIONS

Successful execution of this strategy will require a range of actions.

Actions

Adopt the Experience Local/Whangārei Events Strategy 2025-2030

Responsibility: Elected Members

Timeframe: July 2025

Coordinate Council staffing toward implementation of the strategy across management, event administration, marketing/ social media, communications and facilities

Responsibility: WDC + External

Timeframe: Continued

Proactively socialise the strategy to prospective and existing event makers, promoters, funders, sponsors, and service providers

Responsibility: WDC

Timeframe: Continued

Community engagement

- Surveys and feedback: Conduct regular surveys to gather feedback on events
- Community meetings: Strengthen the creative ecosystem through opportunities, visibility, and networks.
- Celebrate local stories, voices, and creative excellence social media and marketing campaigns

Responsibility: Events and Venues

Timeframe: Continued

Develop

- Event proposal forms
- Pre-event evaluation criteria
- Post-event impact measurement process

Responsibility: WDC + External

Timeframe: LTP Year 2

Regulatory

- Road closure processes refined
- Events on Council land permit process
- Filming on Council land process developed
- Crowded spaces strategy

Responsibility: WDC

Timeframe: LTP year 2

Assess all currently funded and proposed events against newly developed pre-event evaluation criteria prior to proceeding

Responsibility: WDC

Timeframe: ASAP

Collaborate with existing event operators and activators within our District to understand partnership potential's

Responsibility: WDC

Timeframe: Continued

Event diversity

Use guiding principles for events and community activations considering:

- equitable access
- environmental sustainability
- economic benefits
- Social benefits

Responsibility: WDC

Timeframe: ASAP

Partnerships and sponsorships

- Local businesses: Collaborate with local businesses to sponsor events and provide resources.
- District development: Work with district development and Northland Inc, our regional tourism Organisation to attract visitors to Whangārei through well-promoted events.
- Educational institutions: Partner with schools and universities to involve students in event planning and execution.

Responsibility: Venues and Events

Timeframe: ASAP

Contribute to related parts of Council with a view toward supporting event growth i.e. licensing, zoning, Council-owned property, urban design, and planning

Responsibility: WDC

Timeframe: Continued

Marketing and promotion

Aimed at capturing and supporting community and district-wide event streams, it's essential to focus on creating a diverse, inclusive, and easily accessible events ecosystem that appeals to a wide range of audiences.

- Social media campaigns: Use social media platforms to promote events and engage with the community.
- Local media: Advertise events through local newspapers, radio stations, and community bulletin boards.
- Event calendars: Maintain an up-to-date online event calendar on the Whangarei District Council website.
- WOW (What's on Whangarei)

Responsibility: WDC

Timeframe: Continued - WIP

Redesign and develop

- WoW - Event development to better suit development of events for the Whangarei District.
- Endless summer festival
- Multicultural arts festival – 2027 – 2028 April
- Youth festival – 2025 -2026 – (May)
- Puanga Matariki June/July
- Silver Festival September
- Savor Festival October
- Christmas Festival November - December

Responsibility: Venues and Events

Timeframe: LTP Year 2 and 3

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Support re-development of KEA and the Knowledge Precinct. The knowledge, education and art hub to include a fit for purpose entertainment solution for Northland

Responsibility: WDC

Timeframe: Continued

.....

Re develop a pricing structure for events held on council land to support maintenance of event spaces

Responsibility: WDC

Timeframe: LTP Year 2

.....

Sustainability and inclusivity

- Eco-friendly practices: Implement sustainable practices such as recycling, waste reduction, and using eco-friendly materials at events.
- Accessibility: Ensure events are accessible to all, including those with disabilities, by providing necessary facilities and support.

Responsibility: WDC + External

Timeframe: Continuous

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Evaluation and improvement:

- Post-event analysis
 - Purpose: Review the event to measure success and identify areas for improvement.
 - Methods: Collect feedback from attendees and analyze data like attendance and engagement.
 - Outcome: Understand strengths and weaknesses to inform future events.
- Continuous improvement:
 - Purpose: Use feedback and data to enhance future events.
 - Methods: Implement changes based on insights, refine processes, and adopt best practices.
 - Outcome: Achieve more successful and impactful events over time.

Responsibility: All

Timeframe: Continuous



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2.4 Resource Management Reform – Central Government Consultation on National Direction Packages

Meeting:	Council Briefing
Date of meeting:	10 July 2025
Reporting officer:	Yvonne Masefield, Manager - District Plan Rob Burgoyne, Kaiārahi Pūkenga - Planner Philip Waters, Senior Planner – District Plan

1 Purpose / Te Kaupapa

This report provides an update to Elected Members on the Resource Management Reforms (RM Reforms), with a specific focus on the recently announced National Direction packages and what this means for the work of Council.

2 Background / Horopaki

The current Central Government RM Reforms seek to replace the Resource Management Act 1991 (RMA) with a more efficient and effective planning system. Work toward this outcome is being undertaken in three phases by the Central Government:

- **Phase One** - Repeal the Natural and Built Environment Act and Spatial Planning Act.
- **Phase Two** - Targeted changes within the current resource management system to improve its performance, including:
 - Fast-track Approvals Act 2024;
 - Resource Management (Freshwater and Other Matters) Amendment Act 2024;
 - Resource Management (Consenting and Other System Changes) Amendment Bill (submissions closed February 2025);
 - Programme of changes to National Direction instruments (**this package**).
- **Phase Three** - Replacement of the RMA (expected late 2025, to be enacted mid 2026).

Phase 1 was completed in December 2023 and Phase 2 is progressing with the Fast-track Approvals Act 2024 and Resource Management (Freshwater and Other Matters) Amendment Act 2024 now law. The Resource Management (Consenting and Other System Changes) Amendment Bill is currently making its way through the legislative process. Consultation on proposed changes to National Direction instruments opened on 29 May 2025, closely followed by a second announcement, “Going for Housing Growth – Providing for Urban Development in the new Resource Management System”, that sets out proposals relating to the replacement RMA.

Phase 2 and 3 reforms have wide-reaching implications for Council business processes, particularly in the resource consents, compliance monitoring, and District Plan areas of Council. The full extent of impacts is not yet known, with detailed announcements on the replacement RMA yet to come and the Resource Management (Consenting and Other System Changes) Amendment Bill yet to be brought into law.

There is a more immediate need to ensure alignment of the District Plan work programme with recently announced changes to National Direction. The proposed new and amended National Direction instruments will also have impacts on strategic planning (including planning for infrastructure) and will influence decision making on resource consent applications, and the preparation of local plans and a spatial plan under the new planning system in the future.

As the RM Reforms have significant implications for the work of Council, Elected Members have been continually updated on the RM Reforms since early 2024 through Operational Reports to the Strategy, Planning and Development Committee and more specific project briefings to Council. Central Government announcements to date have been actively followed to ensure alignment of the current District Plan work programme, reporting and feedback to elected members.

Recent RM Reform announcements relating to the National Direction packages including those of relevance to the “Going for Housing Growth” proposals have provided greater detail of the proposed RM Reform. This has enabled further analysis by Staff about what these proposals would mean for the work of Council, and ultimately for our community. The analysis has identified some matters of strategic relevance to the Whangārei District and is on-going, particularly in relation to the announcements relating to the “Going for Housing Growth” programme.

As reported previously we have very limited resourcing to dedicate to submissions, with a more substantive submission likely coming at the expense of other work programmes. Given the scale and pace of the reform programme, and the breadth of submissions that are likely to be received across the sector, the impact of a submission from Council may also be limited. As such the staff review has predominantly been driven by ensuring that there is a robust understanding of the reform programme in order to:

- Provide sound advice to Elected Members.
- Prioritise work programmes.
- Ensure that we are in the best possible position to respond for our community.

However, staff are acutely aware of the broader implications of the reform programme, and the fact that there may be a desire from Elected Members to participate through submissions. Should Elected Members be minded toward making a submission it is suggested that the submission provides high-level feedback from a local government perspective with focus on matters of strategic relevance to the Whangārei District that will ultimately impact on our community, rather than technical matters or matters that would have impact across New Zealand, which will likely be addressed through a range of sector submissions.

3 Discussion / Whakawhiti kōrero

Announcements on National Direction packages are the focus of this Agenda, rather than the RM Reform generally. However, detail of the broader RM Reform is included as relevant to context setting for the National Direction packages.

Attachment 1 includes a detailed analysis of new and amended National Direction with a summary of this analysis provided in the discussion below.

3.1 Phase 3 – Replacement RMA

Earlier this year the Central Government announced that the RMA will be replaced with two new acts in Phase 3 of the Resource Management Reforms: The Planning Act and the Natural Environment Act.

A Planning Act is proposed to focus on land-use planning and regulation, enabling urban and infrastructure development in alignment with the Government’s Going for Housing Growth plan and the 30-year National Infrastructure Plan. The proposals aim to create well-

functioning urban and rural areas. For the Whangarei District Council, a local plan (to be housed within one plan for the Region) will need to be prepared to replace the current District Plan under this proposed legislation.

A Natural Environment Act is proposed to concentrate on the use, protection, and enhancement of natural resources, including land, air, freshwater, coastal and marine water, and other natural resources. The dual act approach is proposed to reduce duplication and overlap between different laws and regulations, providing a clearer framework for managing effects on the natural environment. Preparation of a plan under the Natural Environment Act (to be housed within one plan for the Region) will be the responsibility of the Regional Council.

The new system as proposed under Phase 3 of the RM Reform would:

- Set environmental limits to protect natural resources and provide more certainty around where development can and should be enabled.
- Narrow the scope of the resource management system to make clear what the system manages and what regulation is covered by other legislation.
- Include greater standardisation, including standardised land use zones and overlays.
- Require regional spatial planning to ensure a clear and consistent framework for managing land use and natural resources whilst balancing development needs with environmental protection.

The details of the Replacement RMA legislation are expected to be introduced as a Bill in parliament later this year. Specific details of what this replacement legislation will mean for the business of council will not be known until the bill is introduced.

3.2 Going for Housing Growth Programme

Alongside the RM reforms Central Government have a “Going for Housing Growth” programme that is looking at ways to address ongoing housing shortages. This programme is structured around three pillars, with the objective of improving housing affordability by significantly increasing the supply of developable land for housing, both inside and at the edge of our urban areas. These are:

- **Pillar 1:** Freeing up land for urban development, including removing unnecessary planning barriers.
- **Pillar 2:** Improving infrastructure funding and financing to support urban growth.
- **Pillar 3:** Providing incentives for communities and councils to support growth.

System changes as part of the RM Reforms form part of achieving Pillar 1.

The recently released consultation document “Going for Housing Growth – Providing for Urban Development in the new Resource Management System”, seeks views on proposals relating to the replacement RMA that fall within Pillar 1. This consultation also confirms that Government will not amend the National Policy Statement on Urban Development in advance of the RM reforms, as had previously been planned. This is to minimise the need for costly and time-consuming changes to council plans under the current system.

Limited details of the Pillar 1 proposals, and their implications for Council, are discussed further in Section 3.3 below. However, in the coming weeks Staff will review the proposals in more detail and provide a separate briefing to Council if deemed necessary ahead of the close of consultation on 17 August 2025.

Pillar 2 includes a package of reforms to improve infrastructure funding and financing, including:

- Replacing the development contributions regime with a development levy system
- Changing the Infrastructure Funding and Financing Act 2020
- Improving the flexibility of targeted rates for growth infrastructure

Pillar 3 focuses on providing incentives for councils and communities to support growth.

3.3 Phase 2 – New and Amended National Direction

As part of Phase 2 of the RM Reforms the Central Government opened consultation on a comprehensive series of updates to RMA National Direction on 29 May 2025. The updates are divided into three packages, each addressing different aspects of resource management as follows:

- **Package 1 – Infrastructure and Development** – proposes four new National Direction instruments (for infrastructure, granny flats (minor residential units), papakāinga, and natural hazards) and amendments to four existing National Direction instruments (for renewable electricity generation, electricity transmission, distribution and associated activities, telecommunication facilities).
- **Package 2 – Primary Sector** – proposes amendments to eight existing National Direction instruments (for marine aquaculture, commercial forestry, highly productive land, stock exclusion regulations and the New Zealand Coastal Policy Statement).
- **Package 3 – Freshwater** – Identifies issues with some of the current National Direction instruments for freshwater and seeks feedback on potential options to address the issues. It is anticipated that Government will undertake a second round of consultation on Package 3 once more detailed proposals are drafted.

This was followed by the “Going for Housing Growth – Providing for Urban Development in the new Resource Management System” consultation. Whilst this was billed as **Package 4**, it is distinct in that the proposals do not relate to Phase 2 of the RM reforms.

3.3.1 How does National Direction Fit in the Resource Management System?

National Direction plays a pivotal role in the planning system, providing a framework for consistent and effective resource management across the country. It encompasses various policies and regulations that guide local authorities in their planning and decision-making processes. The role of National Direction in the replacement RMA is expected to be similar.

National Direction includes the following:

- **National Policy Statements (NPSs):** Instruments issued by the Central Government to set out objectives and policies for matters of national significance. They provide direction on specific issues such as freshwater management, urban development, and renewable energy. Local authorities must give effect to NPSs in their regional and district plans, ensuring that national priorities are integrated into local planning.
- **National Environmental Standards (NESs):** These are regulations that prescribe technical standards, methods, or requirements for environmental matters. NESs ensure that there is a consistent approach to managing environmental issues across the country. Local authorities must ensure subdivision and development complies with NESs, which often mean the rules of an NES will override/ replace rules in district and regional plans.
- **National Planning Standards:** These standards aim to improve the consistency and efficiency of planning documents across New Zealand. They set out requirements for the structure, format, and content of regional policy statements, regional plans, and district plans. The goal is to make planning documents easier to understand and use, and to ensure that they align with national priorities.
- **Regulations under Section 360 of the RMA:** These generally deal with implementation detail and technical matters. They provide the practical framework for applying and enforcing the broader principles and policies outlined in the RMA.

3.3.2 Proposed New and Amended National Direction Instruments

Details of the Central Government proposals for new and amended National Direction instruments currently being consulted on are provided in Attachment 1 and summarised in Table 1 below.

Any changes made to National Direction instruments are expected to have legal effect in the current planning system (once gazetted) and carry through to the new planning system. New and amended National Direction instruments proposed as part of the 'Infrastructure and Development' and 'Primary Sector' packages are expected to be finalised ahead of changes under the 'Freshwater Package'.

Table 1: Summary of proposals for new and amended National Direction

Topic	National Direction Instrument	Proposal
Infrastructure	NPS Infrastructure (NPS-I)	New NPS to enable infrastructure by recognising benefits, operational and functional needs, and strategic plans.
	NPS Renewable Electricity Generation (NPS-REG)	Replaces NPS-REG 2011 to give greater weight to renewable energy generation benefits and locational needs and support emissions targets.
	NPS Electricity Networks (NPS-EN)	Replaces NPS on Electricity Transmission 2008 and: <ul style="list-style-type: none"> ▪ Expands scope of the NPS to include distribution lines. ▪ Sets a lenient regime for network upgrading, including intensification of existing infrastructure. ▪ Brings all ancillary electricity network activities under one regime (e.g. tree trimming).
	NES Electricity Network Activities (NES-ENA)	Replaces NES for Electricity Transmission Activities 2009 and: <ul style="list-style-type: none"> ▪ Expands scope of the NPS to enable more activities by default (e.g. stormwater, EV chargers, river works). ▪ Introduces a buffer corridor and setbacks for subdivision and land use.
	NES Telecommunication Facilities (NES-TF)	Updates NES-TF 2016, expanding the permitted activities (pole heights, temporary installations, heritage connections) to meet coverage demand.
Granny flats (minor residential units)	NES Granny Flat (NES-GF)	New NES-GF to provide a permitted pathway for one 70m ² residential unit per site in specified zones (subject to compliance with specific setback and building coverage rules and the district-wide planning rules (e.g. rules for natural hazards)).
Papakāinga	NES Papakāinga (NES-P)	New NES-P to provide an enabling framework for up to 10 residential units on ancestral Māori land in rural, residential and Māori purpose zones, subject to compliance with specific

		development controls and existing rules in District Plans.
Natural Hazards	NPS Natural Hazards (NPS-NH)	New NPS-NH to establish nationally consistent objectives and policies for managing natural hazard risks.
Marine Aquaculture	NES Marine Aquaculture (NES-MA)	Amendments to the NES-MA 2020 to: <ul style="list-style-type: none"> Remove some restrictions that apply when reconsenting marine aquaculture activities. Set out a more lenient activity status for certain changes to consent conditions for existing marine aquaculture consents. Make the rules for research and trial activities for aquaculture more permissive.
Commercial Forestry	NES Commercial Forestry (NES-CF)	Amendments to the NES-CF 2023 to: <ul style="list-style-type: none"> Clarify when councils can impose stricter rules than the NES. Remove councils' broad discretion to have more stringent rules. Introduce a slash management risk assessment approach. Removing the requirement for afforestation and replanting plans.
Highly Productive Land	NPS Highly Productive Land (NPS-HPL)	Amendments to the NPS-HPL 2022 to: <ul style="list-style-type: none"> Reduce the classes of land that are classified as highly productive. Change highly productive land mapping criteria. Extend or suspend the timeframes for regional councils to map highly productive land.
Mining and Quarrying	NPS Indigenous Biodiversity (NPS-IB) NPS Highly Productive Land (NPS-HPL) NES Freshwater (NES-F) NPS Freshwater Management (NPS-FM)	Amendments to National Direction instruments to make the provisions within these instruments more enabling and more consistent for quarrying and mining activities and essential ancillary activities.
Freshwater	NPS Freshwater Management (NPS-FM)	Amendments to NPS-FM 2020 to: <ul style="list-style-type: none"> Rebalance the policy for all water users. Provide greater flexibility for councils to decide on environmental limits and bottom lines. Simplify wetland regulation. Better enable the continued domestic supply of fresh vegetables.

	NES Freshwater (NES-F)	Amendments to NES-F to simplify requirements around fish passage, nitrogen fertiliser, wetlands, and culverts.
	Resource Management (Stock Exclusion) Regulations 2020	Amendment to the regulations to remove the requirement to exclude grazed beef cattle and deer in low intensify farm systems from wetlands.
Coastal Environment	New Zealand Coastal Policy Statement 2010 (NZCPS)	Amendments to the NZCPS to provide a more enabling framework for specified infrastructure, renewable electricity generation, electricity transmission, aquaculture and resource extraction within the coastal environment.
Housing	NPS Urban Development (NPS-UD)	Government has announced that no amendments will be made to the NPS-UD ahead of the replacement to the RMA. However, Government is consulting on matters that are currently addressed in the NPS-UD to inform the RMA replacement bills.

3.3.3 What do the National Direction proposals mean for Council?

Whilst some of the proposals can at a high level be supported or generally align with outcomes provided for in the Operative District Plan, the National Direction package forms part of a wider package of reforms that collectively could have wide reaching implications for planning at a local level. As the proposals on National Direction have been announced in absence of a replacement RMA it is difficult to understand at this stage the full extent of what this might mean for Council. However, it is of note that:

- Whilst National Direction supports efficiency within the system by providing for consistency in matters of national importance, some of the proposals within the package stray into areas that traditionally have been of local concern (e.g. Granny Flats), where local policy responses have previously been applied to ensure alignment with community aspirations.
- The National Direction package, when considered in the context of wider reform proposals, will likely result in some substantive changes in the way we plan for growth, manage land use and development, and deliver infrastructure. This will ultimately result in cost to ratepayers associated with infrastructure funding and business process changes required to deliver the requirements of a new RM system.

Some of the changes proposed in the National Direction package present a major shift in policy settings. While some of these policy shifts are supported, others are not yet fully understood (due to the proposals being announced in isolation) and/or could result in unintentional outcomes for Whangārei. Some of the key changes are summarised below:

- Infrastructure

The proposed NPS for Infrastructure promotes a fundamental shift in assessing and approving infrastructure – ensuring that economic benefits and value for money are among the highest considerations. While the NPS-I does have benefits, including strengthening the role of spatial and strategic planning in decision-making, this shift comes with some challenges and uncertainties, particularly in relation to funding. What is uncertain under the proposed NPS-I is the process for Council's to manage the cost of infrastructure delivery and maintenance. This is because there is companion reform (i.e.

changes to Development Contributions via a Development Levy system) not yet a Government Policy – happening separately.

- *Highly Productive Land*

Changes to the NPS for Highly Productive Land could significantly impact the Council's ability to implement planning provisions or spatial planning mechanisms to protect land for primary production activities, particularly when viewed in the context of the "Going for Housing Growth" proposals which suggest that greenfield development should be encouraged/ supported. This could significantly compromise the availability of most of our productive soils for food and fibre production. While addressing the housing crisis is important, there is the risk that this could come at the expense of protecting – and restoring – land for primary production. Since both urban development and primary production require similar land characteristics – such as low slope, good soil conditions, and proximity to key transport routes and infrastructure – the NPS-HPL should offer clear and strong guidance to balance these competing land uses appropriately.

- *Natural Hazards*

The proposed NPS for Natural Hazards provides useful national direction to local authorities on how to assess and manage natural hazard risk. The proposed definitions, objectives, and policies are supported as they represent an appropriate approach for managing natural hazard risks that aligns with Whangārei District Council's Plan Change 1: Natural Hazards. Having national direction on these matters ensures clarity and consistency.

- *Freshwater*

The NPS-FW proposals fundamentally shift the approach to freshwater management, potentially reducing the priority given to the health and well-being of freshwater and shifting the focus to economic opportunities and community expectations. While these changes may not have a direct impact on Whangārei District Council's functions and responsibilities, they could have significant impacts on environmental, cultural, and social outcomes in the district, particularly considering the value that our communities place on the natural assets of the Whangārei District.

The Papakāinga and Granny Flat proposals will have some influence on land use and development in the District. At a high level these proposals generally align with enabling provisions in the Operative Direct Plan. In summary:

- *Papakāinga*

The proposed NES for Papakāinga would take precedence over the Papakāinga provisions in the District Plan where the Plan rules are more restrictive. However, the District Plan may still include rules that are more enabling than those in the NES-P. While the existing Papakāinga provisions in the District Plan are broadly aligned with the NES-P, the NES-P would permit development of up to 10 dwellings plus ancillary activities per site. This may enable a limited degree of additional density on smaller sites. Additionally, the NES-P may apply to a small number of sites that the District Plan's Papakāinga provisions do not apply to, potentially creating opportunities for Papakāinga development in additional locations.

- *Granny Flats*

The proposed NES for Granny Flats would take precedence over the District Plan provisions where the Plan rules are more restrictive, though more lenient rules may still be retained. While the District Plan provides a reasonably enabling framework for minor residential units with many zones allowing for minor residential units subject to permitted rule criteria (e.g. setbacks), many of the existing District Plan provisions relating to minor residential units, such as those controlling building and major structure coverage, outdoor

living courts, setbacks, sunlight access, and privacy would no longer be applicable. This potentially risks poor outcomes in the District.

The proposals for new and amended National Direction instruments have wide-reaching implications for district plan making processes. Some of these changes may not be required to be implemented until the new planning system is enforced, and others may impact the current work program of the District Plan Department. Full details of these impacts are outlined in Attachment 1 with a summary provided in Attachment 2. In summary:

- At this stage it is expected that new and amended National Direction that has an influence on current plan reviews (i.e. renewable energy, network utilities and indigenous biodiversity) will be gazetted in late 2025/ early 2026. This timing would enable notification of associated plan changes through 2026. As district plans have been signaled to 'act' as transitional plans in the new system for a number of years following enactment of the replacement RMA, it is recommended that these plan changes be progressed sooner rather than later to ensure that the Whangārei District Plan is as up to date as possible and provides for aligned and sustainable outcomes for the District through this transitional phase.

As noted above, the proposals will have some influence on many Council business processes including decision-making processes relating to resource consent applications. Details of these impacts are outlined in Attachment 1, noting that at the time this agenda was being prepared all impacts across departments may not have yet been identified or fully understood.

4 Proposed Next Steps

4.1 Making a Submission

Submissions on the National Direction Packages 1-3 close on 27 July 2025.

Noting that staff time and resourcing to make a submission is limited, should Elected Members be minded toward making a submission it is suggested that the submission provides high-level feedback from a local government perspective with focus on matters of strategic relevance to the Whangārei District (those set out above in relation to infrastructure, highly productive land, and natural hazards), rather than technical matters or matters that would have impact across New Zealand, as these matters will in the likely case be addressed in sector submissions.

Over the coming weeks the District Plan Department will continue discussions with other Council departments to identify any other impacts on Council business and projects. If, over the coming weeks, additional issues of strategic relevance to the Whangārei District are identified these will be considered for inclusion in any Council submission.

However, the timeframes for any submission are extremely tight, with it being questionable whether it will be possible to get a submission to the Strategy Planning and Development Committee prior to the due date. As indicated above, a more substantive submission would also only be possible at the expense of other work programmes.

4.2 Other RM Reform Briefings

The following additional briefings around the RM reforms are currently planned.

- The Central Governments "Going for Housing Growth" (package 4) consultation document will be presented to Elected Members at the 23 July 2025 Council briefing alongside recommendations relating to the preparation of a submission.
- Staff are presenting to Te Huinga on the National Direction packages 1 – 4 on 21 July 2025.
- The National Direction packages will be presented by Staff at the 7 August Te Kārearea Committee meeting.

We will continue providing RM reform updates through the operational report and via Council briefings where more substantive announcements are made.

5 Financial/budget considerations / Ngā pānga pūtea/tahua

Any District Plan related work resulting from the RM Reforms will be resource by staff time and the operational District Plan budgets (as required), with the work being prioritised within the budget and staff resourcing limitations, based on the direction of Council.

6 Significance and engagement / Te Hira me te Arawhiti

The decisions or matters of this Agenda do not trigger the significance criteria outlined in Council's Significance and Engagement Policy, and the public will be informed via agenda publication on the website.

7 Attachments / Ngā Tāpiritanga

Attachment 1: Review of the National Direction consultation package 2025

Attachment 2: Influence of the National Direction package announcements on District Plan Making (summary table)

Influence of the proposed National Direction package (June 2025) on District Plan Making

National Direction Instrument	Influence of proposals on District Plan making	Timing for District Plan amendments
New NPS Infrastructure (NPS-I)	Will require alignment of District Plan with direction set in policy.	Likely given effect to in 'local plan' under new planning system
Amended NPS Renewable Electricity Generation (NPS-REG)	Provides direction on the policy settings for renewable energy provisions in the district plan. Confirms the need to progress the Renewable Energy plan change within the current District Plan work programme.	Recommended to be given effect to under RMA through Renewable Energy plan change proposed for notification in early to mid-2026.
Amended NPS Electricity Networks (NPS-EN)	Provides direction on the policy settings network utilities provisions in the District Plan. Will influence the drafting of a Network Utilities plan change within current District Plan work programme.	Recommended to be given effect to under RMA through Network Utilities plan change proposed for notification in early to mid-2026.
Amended NES Electricity Network Activities (NES-ENA)	Provides direction on what rules cannot be included in District Plans relating to electricity networks. Will influence the drafting of the Network Utilities plan change within current District Plan work programme.	Recommended to be given effect to under RMA through Network Utilities plan change proposed for notification in early to mid-2026.
Amended NES Telecommunication Facilities (NES-TF)	Provides direction on what rules cannot be included in District Plans relating to telecommunications facilities. Will influence the drafting of the Network Utilities plan change within current District Plan work programme.	Recommended to be given effect to under RMA through Network Utilities plan change proposed for notification in early to mid-2026.
New NPS Natural Hazards (NPS-NH)	There are no specified timeframes for giving effect to the NPS-NH through district plans, meaning a plan change is not required in the short term. The proposed policy direction is well aligned with Plan Change 1 – Natural Hazards to the Whangārei District Plan.	Given effect to in 'local plan' under new planning system.
Amended NPS Highly Productive Land (NPS-HPL)	The NPS-HPL currently requires changes to the District Plan to align with Regional Council mapping of highly productive land. Northland Regional Council have currently paused mapping of highly productive land pending the amendments to the NPS-HPL.	Changes are likely to be given effected to in the new planning system given the need for the Regional Council to complete mapping first.
Amended NPS Indigenous Biodiversity (NPS-IB)	Provides direction on the policy settings for indigenous biodiversity provisions in the District Plan. Will influence the drafting of the Ecosystems and Indigenous Biodiversity plan change within current District Plan work programme.	Recommended to be given effect to under RMA through an Ecosystems and Indigenous Biodiversity plan change proposed for notification in mid-late 2026.
Amended NES Commercial Forestry (NES-CF)	Provides nationally consistent regulations to manage the environmental effects of commercial forestry.	May require amendments to the District Plan to align it with the NES-CF. Section 44A of the RMA enables this

		to be undertaken without a Schedule 1 plan change.
Amendments to NZ Coastal Policy Statement (NZCPS)	The proposed amendments would not require the Whangārei District Plan to be amended. Instead, it is envisaged that any misalignments would be addressed through the transition to the new Resource Management System following the replacement of the Resource Management Act 1991.	Given effect to in 'local plan' under new planning system.
New NES Granny Flat (NES-GF)	No influence as it is proposed that a plan change to the District Plan to align with the NES-GF is not required.	-
New NES Papakāinga (NES-P)	No influence as it is proposed that a plan change to the District Plan to align with the NES-P is not required.	-
Amended NPS-Freshwater (NES-FW)	No influence as is a Regional Council matter.	-
Amended NES-F	No influence as is a Regional Council matter.	-
Amendment to Stock Exclusion Regulations	No influence as is a Regional Council matter.	-
New NES-Marine Aquaculture (NES-MA)	No influence as is a Regional Council matter.	-

Memorandum on Central Government Consultation on Updating National Direction under the Resource Management Act 1991

To Yvonne Masfield, Manager District Plan

From Robert Burgoyne, Kaiārahi Pūkenga – Planner; Natalie Dey, Intermediate Planner; Api Prashumsan – Scholarship Student – Planning; Vita Strohush, Intermediate Planner; Philip Waters, Senior Planner; and Eden Wynne – Intermediate Planner

Copies Dominic Kula, General Manager – Planning and Development

Subject Central Government’s Consultation on Updating National Direction under the Resource Management Act 1991

Date 26 June 2025

1. Background

On 29 May 2025 Central Government began consultation on the following packages of National Direction as part of the broader Resource Management Reform.¹ Consultation on these packages is open for submissions until 27 July 2025:

- Package 1: Infrastructure and development
- Package 2: Primary sector
- Package 3: Freshwater

Packages 1 – 3 include amendments to 12 existing National Direction instruments and four new National Direction instruments. A fourth package, “Going for Housing Growth”, opened for consultation on 18 June 2025.

2. Structure of this memorandum

This memorandum provides a high-level summary of the proposals under Packages 1 – 3 and identifies the implications of the proposals for Council. It is structured as follows:

- Package 1 – National Direction on Infrastructure
- Package 1 – National Policy Statement for Natural Hazards
- Package 1 – National Environmental Standards for Granny Flats
- Package 1 – National Environmental Standards for Papakāinga
- Package 2 – Amendments to the National Policy Statement for Highly Productive Land
- Package 2 – Amendments to the New Zealand Coastal Policy Statement
- Package 2 – Amendments to the National Environmental Standards for Commercial Forestry
- Package 2 – Amendments to the National Environmental Standards for Marine Aquaculture
- Package 2 – Amendments to the Resource Management (Stock Exclusion) Regulations
- Package 2 – Mining and Quarry provisions in Multiple National Direction Instruments
- Package 3 – Amendments to Freshwater National Direction

Each section includes an overview of the proposal, discussion on any impacts for Council and any other potential risks or issues.

¹ More detailed information can be found on the Ministry for the Environment website here: [Consultation on updating RMA national direction | Ministry for the Environment](#).

3. Package 1 – National Direction on Infrastructure

This section focuses on three National Policy Statements (NPSs) and two National Environmental Standards (NESs) from Package 1: Infrastructure and Development:

- NPS on Infrastructure (NPS-I) (new)
- NPS on Renewable Electricity Generation (NPS-REG) (replaces 2011 NPS-REG)
- NPS on Electricity Networks (NPS-ET) (replaces 2008 NPS-ET 2)
- NES for Electricity Network Activities (NES-ENA) (replaces 2009 NES-ETA 3)
- NES for Telecommunication Facilities (NES-TF) (updates 2016 NES-TF)

3.1. Overview of Proposal for Consultation

All five proposed documents are designed to work together, and in many cases are interdependent. Some provisions cross-reference each other (e.g. permitted activities in NES-ENA aligning with policy intent in NPS-ET). Furthermore, where a more specific NPS applies (e.g. NPS-REG, NPS-IB, or NPS-ET), it prevails over the broader NPS-Infrastructure.

The following table provides an overview of the core elements and focus of each policy instrument:

Instrument	Scope	Key Focus
NPS-I	Broad national direction for infrastructure including transport, water, social services, parks and green infrastructure (amongst others)	Enables infrastructure by recognising benefits, and operational and functional needs.
NPS-REG	Renewable electricity generation (wind, solar, hydro etc.)	Gives greater weight to the benefits of renewable energy generation and locational needs.
NPS-EN	Electricity transmission and distribution	Expands scope to include distribution lines; sets a lenient regime for network upgrading, including intensification of existing infrastructure; brings all ancillary electricity network activities under one regime, e.g. tree trimming.
NES-ENA	Electricity network activities	Expands scope to enable more activities by default (e.g. stormwater, EV chargers, river works; height increases to existing infrastructure); introduces a buffer corridor and setbacks for subdivision and land use.
NES-TF	Telecommunications	Expands permitted activities (pole heights, temporary installations, heritage connections) to meet coverage demand.

The infrastructure package shares a common problem definition and introduces several key shifts in national direction. The package is generally underpinned by the following justifications:

- The current resource management system lacks cohesive and comprehensive national direction for infrastructure.

² National Policy Statement Electricity Transmission (NPS-ET)

³ National Environmental Standards for Electricity Transmission Activities (NES-ETA)

- Planning decisions are inconsistent, often failing to recognise the public-good nature of infrastructure or its interdependence (e.g. hospitals needing roads, power, water).
- Infrastructure delivery is hampered by complex consenting, reverse sensitivity effects, and lack of recognition for functional constraints (e.g. site requirements, corridor continuity).

Key objectives of the package include:

- Each instrument requires decision-makers to recognise and provide for the benefits of infrastructure.
- A strong and recurring theme is the recognition that infrastructure may need to locate in sensitive or constrained environments. Functional or operational needs are to be actively supported.
- Several instruments propose new buffers, corridor protections, or policy direction to manage interface conflicts and prevent reverse sensitivity issues.
- Decision-makers must now “have regard to” spatial plans (including Future Development Strategies), giving more influence on long-term infrastructure planning in regulatory decisions.
- The package prioritises renewable energy generation, electricity transmission and distribution, and electric vehicle infrastructure to support national emissions and energy security targets.
- While Māori interests are mentioned, protection of Sites and Areas of Significance to Māori is relatively weak in the NPS-Infrastructure compared to the likely expectations of the NPS-IB and regional hapū and iwi environmental management plans.
- The package signals a strong push for growth and upgrading of infrastructure across all sectors, creating potential pressure points for planning, consenting, and community engagement.

3.2. Impact on Current District Plan Review and Work Programme

The infrastructure package provides clearer direction on the role and expectations for infrastructure in the planning system. This has direct implications for several elements of Whangārei District Council’s District Plan, particularly chapters that are overdue for review or under preliminary scoping.

Network Utilities (NTW) and Critical Electricity Lines (CEL):

These chapters have passed the 10-year review point. Preliminary review work commenced in late 2024, including early drafting and stakeholder engagement. Officers have paused further work pending the outcome of the Phase 2 reforms. The proposed instruments now confirm the relevance of reviewing these chapters.

The updated NES-TF expands permitted activity standards for telecommunication facilities, particularly:

- Pole heights
- Temporary installations
- Renewable-powered telecom facilities
- Connectivity to heritage buildings

These changes will reduce the relevance of local controls in this area but may also lessen resource consent volume.

The NPS-EN expands the definition of the electricity network to include distribution lines, while the NES-ENA introduces new permitted activity rules and national corridor protections for both transmission and distribution assets. The draft NPS-EN includes a strong direction to avoid direct effects and reverse sensitivity effects on electricity networks. This includes a mandatory requirement for councils to identify (map) electricity network assets – both transmission and

distribution lines. While overlays and zoning changes are not strictly required, they may be used to spatially implement national direction and improve clarity for plan users.

The NES-ENA will introduce new permitted activity standards and default rules that must be given effect to, reducing discretion but clarifying expectations. A new concept of routine and non-routine activities is proposed for maintenance and upgrading of electricity lines. 'Routine' works would include minor or common upgrade activities and these are subject to more enabling policy direction that would allow intensification of assets. As a result, the new regime would permit by default upgrading and replacement of the existing assets that may not be 'like for like' or to continue to deliver the same or a similar level of service. This is a significant change from the status quo and would override the operative District Plan provisions.

These changes would require significant re-working of District Plan provisions to avoid conflict with new NES rules — particularly around permitted activity thresholds and corridor protections. A number of new definitions are also proposed by the national direction, that do not entirely align with the operative District Plan definitions and would require reconciliation. It has been signaled that the new NES-ENA would allow district plan rules to be more lenient, but not more stringent, in relation to electricity distribution activities (and EV charging infrastructure) regulated by the NES-ENA. Should more lenient provisions be desired, District plans would need to incorporate them using plan-making processes under Schedule 1 of the Resource Management Act 1991.

At this stage, the proposals are draft and lacking important technical detail. In particular, the proposals explicitly state that the following matters have not been decided on and seeking stakeholder input for an appropriate approach:

- **Mapping requirements**

Whether identification and mapping requirements should apply to all parts of the distribution network, or only to critical assets (e.g. critical electricity lines), or another minimum cut-off threshold should be used (e.g. 33kV lines and above).

- **Buffer corridors**

Whether the more restrictive buffer corridor provisions applicable to transmission lines be extended to the high-voltage distribution lines (e.g., 110 kV).

- **NZ Standard NZECP 34:2001**

The appropriateness of referring to compliance with all or some of the third-party code (NZECP 34:2001) in the proposed National Environmental Standards for Electricity Network Activities (NES-ENA)

For the purposes of District Plan reviews, this leaves significant ambiguity for drafting work that has been undertaken toward a proposed plan change. The preliminary review of the chapters identified mapping updates and introduction of buffer corridors as priority areas. However, this work cannot meaningfully proceed until it is known what thresholds will be set by NPS-EN and NES-ETA. Likewise, without a final decision on the application of NZECP 34:2001 there is no ability to finalise buffer corridors for land use activities.

However, the proposals do provide directional clarity to narrow the scope of plan review matters (e.g. by mandating buffers, supporting functional needs, and giving weight to spatial plans). Furthermore, the proposals reinforce the value of addressing interface effects, particularly through spatial buffers and reverse sensitivity management.

Renewable Energy Generation (REG):

Whangārei District Plan currently lacks a chapter or framework for renewable electricity generation (REG), despite current regional and national directives requiring this. Officers had begun exploring options for a new renewable energy chapter; this work was also paused pending reforms. The new NPS-REG confirms the need to progress this work, providing stronger policy levers to recognise the strategic national significance of REG, enable development near generation sources and/or transmission links, and support climate resilience and energy security targets.

There is no specific guidance on battery storage or energy firming infrastructure, despite its importance for network reliability. This represents a notable policy gap that may require local innovation as part of any proposed plan change.

3.3. Impact on other Council Departments and Projects

While the infrastructure package is primarily directed at plan-making and resource consenting, it has broader implications across Council, particularly for departments involved in infrastructure delivery, asset management, and strategic planning.

Similar to other policy statements, the proposed NPS-Infrastructure links to strategic planning documents, including Future Development Strategies and Infrastructure Strategies. Within the proposed definition of 'Strategic Planning Documents', it places similar significance on regarding non-statutory spatial plans and documents adopted by a local authority through resolution. This reinforces the need for alignment between strategic intentions, planning instruments and infrastructure delivery. It may increase scrutiny on the evidential basis for infrastructure priorities (e.g. growth assumptions, resilience criteria) and it could encourage infrastructure providers (including Council itself) to engage earlier in spatial planning and plan reviews.

As with all national policy statements, the requirement to "have regard to" the NPS-Infrastructure and NPS-EN will apply to consenting decisions. The enabling tone of the infrastructure package may streamline internal consenting for Council infrastructure projects.

The increased number of permitted and controlled activities may reduce the volume of resource consents required for infrastructure, which would reduce project costs for council activities, but it could place new importance on compliance monitoring, particularly where activity standards must be met.

No further impacts on other Council departments and projects have been identified at this stage. We will continue further engagement with other Council departments over the coming weeks.

3.4. Additional Impacts/Risks

While the infrastructure package provides clarity on national expectations and helps streamline aspects of the District Plan review, there are also potential risks and implementation challenges to be aware of. The NPS-I does not require local authorities to amend their district plans or regional policy statements within a fixed timeframe.

Hierarchy and Potential Conflict Between National Directions

The NPS-Infrastructure and NPS-EN are highly enabling, but other NPSs (e.g. NPS-Indigenous Biodiversity, NZCPS, NPS-HPL) are more restrictive. The proposed NPS-Infrastructure includes guidance that specific NPSs prevail in case of conflict. However, it may still prove difficult for decision-makers and plan users to resolve overlaps in practice. This could complicate consenting processes and create uncertainty about which direction takes precedence, particularly in areas where infrastructure intersects with sensitive environments.

3.4.1. Proposed NPS-I

Broad scope and applicability

The broad scope of the NPS-I introduces several risks. Firstly, the proposed NPS-I introduces the recognition of both the functional need and operational need of infrastructure to locate in particular environments, specifically within Policy 2, 4 and 6. According to the definition, 'operational needs' includes those "technical, logistical, or operational characteristics or constraints." This widens the scope of what constitutes infrastructure considerably, as well as how decision-makers may interpret what may be a characteristic or constraint.

The proposed inclusion of quarrying activities within the definition of 'Infrastructure Supporting Activities' (D9) warrants careful consideration. Aggregate and quarrying is a finite resource and a key industry for infrastructure and development. It is important to recognise the need for integrated, strategic planning for provision of aggregate to meet current and future demands. However, Policy

4(3) lacks any balancing clauses that ensures effects are appropriately managed for other activities and environments. This omission, compounded by the weak consideration of adverse effects in subpart 2 and 3, could lead to adverse impacts on other land uses, sensitive environments, people, and other activities.

Implications from a more enabling approach

The proposed NPS-I introduces the qualifying term “*where practicable*” in policies that require the enablement of the operation, maintenance, and upgrade of existing infrastructure, the provision of new infrastructure, and the management of the interface between infrastructure and other activities. This qualifier applies when avoiding, remedying, or mitigating adverse effects on other activities, environmental values, locations, and people. This qualifier may reduce the responsibility and accountability of infrastructure providers in managing and addressing adverse effects. This qualifier could also weaken the ability of affected parties to challenge infrastructure activities based upon their adverse effects onto other activities.

Furthermore, the proposed NPS-I sets strong parameters around how amenity and effects are to be considered. Policy 10 states that “planning decisions must recognise that changes in amenity from infrastructure activities are necessary to achieve well-functioning urban and rural environments.” This prioritises the perceived benefits of infrastructure over its potential disbenefits. The justification for this policy that it will counter “status quo bias” is itself a form of bias, for it dismisses legitimate concerns and values that seek a balanced approach between infrastructure activities and other activities.

Weight Given to Spatial Planning Instruments

The proposed NPS-I would require planning decisions to “have regard to” strategic planning documents, such as Future Development Strategies and Infrastructure Strategies, and “consider” non-statutory spatial plans and masterplans.

Potential challenges for funding

The proposed NPS-I promotes a fundamental shift in assessing and approving infrastructure – ensuring that economic benefits and value for money are among the highest considerations.

What is uncertain under the proposed NPS-I is the process for Councils to manage the cost of infrastructure delivery. This is because there is companion reform – not yet Government Policy – happening separately in this space, and there is no detail about how these tools will function jointly.

Under Pillar 2 of the Going for Housing Growth programme, the Government announced direction of “growth paying for growth”, alongside changes to Development Contributions to a Development Levy system⁴. While practical details are not known, Development Contributions require detailed planning and costing for specific infrastructure projects tied to particular developments, while Development Levies will be applied more broadly and flexibly across larger urban areas without needing precise details.

3.4.2.NPS-REG

Omission of Energy Firming Infrastructure

While the NPS-REG strongly supports renewable electricity generation (REG), it does not explicitly reference energy firming infrastructure, such as battery storage systems. These systems are increasingly critical for grid stability, especially where solar and wind generation contribute significantly to the network. There is known interest in development of such infrastructure in Whangarei. Their omission from the national direction could lead to a regulatory grey area, with uncertainty about how they should be treated in plans and consenting decisions.

⁴ <https://www.beehive.govt.nz/speech/going-housing-growth-new-and-improved-infrastructure-funding-and-financing>

4. Package 1 – National Policy Statement for Natural Hazards (NPS-NH)

4.1. Overview of Proposal for Consultation

The proposed National Policy Statement for Natural Hazards (“NPS-NH”) seeks to establish nationally consistent objectives and policies for managing natural hazard risks. It promotes a risk-based, proportionate approach that incorporates climate change considerations, relies on the best available information, and ensures new development does not exacerbate significant hazard risks.

The NPS-NH applies to the following specified natural hazards:

- Flooding
- Landslips
- Coastal erosion
- Coastal inundation
- Active faults
- Liquefaction
- Tsunami

While focused on these hazards, the NPS-NH does not prevent councils from addressing other hazard types. It applies to all activities under the Resource Management Act 1991, excluding primary production and infrastructure.

Importantly, the NPS-NH will provide direction to local authorities on how to assess and manage natural hazard risk, including setting minimum standards for risk identification and mitigation. However, councils retain the ability to adopt more risk-averse approaches where appropriate, allowing for local context and community values to shape decision-making.

4.2. Impact on Current District Plan Review and Work Programme

There is no specified timeframe for giving effect to the NPS-NH through district plans, meaning a plan change is not required in the short term. Additionally, the direction of the NPS-NH is considered to be well aligned with Whangarei District Council’s Plan Change 1: Natural Hazards (“PC1”), which is currently in the final stages of the plan change process and under appeal. The narrow scope of these appeals limits the ability to incorporate any changes in response to the NPS-NH; however, no changes would be needed under the current proposals due to the strong alignment between the NPS-NH and PC1. Key areas of alignment include:

- The NPS-NH requires councils to use the best available information when making planning decisions related to natural hazard risk. It also directs that risk assessments must proceed even where information is incomplete or uncertain, recognising that hazard risk inherently involves uncertainty. This aligns with PC1, as it enables local authorities to progress with natural hazard management with inputs that are available at a point in time, as opposed to delaying management until ‘better’ information is available and accessible.
- The requirement to assess climate change impacts over a 100-year timeframe is consistent with PC1, which already incorporates this horizon into hazard mapping and risk assessments.
- The NPS-NH adopts a low threshold for “significant risk,” which aligns well with PC1’s precautionary approach. It introduces a standard risk matrix based on likelihood and consequence, setting a national minimum. Councils may adopt stricter definitions but not more permissive ones, therefore no changes to PC1’s risk framework would be required.
- The NPS- NH seeks to proportionally manage natural hazard risk which means applying more restrictive approaches to activities that pose a higher level of risk (e.g. health care

facilities, elderly care facilities, schools and residential development). This aligns with PC1 which applies more restrictive provisions to “vulnerable activities” which includes the same category of activities described in the NPS – NH.

- The NPS-NH applies to all activities except primary production and infrastructure. While this differs slightly from the Northland Regional Policy Statement and PC1, it does not restrict councils from managing additional hazard types or applying broader controls. Although PC1 includes provisions for managing these activities, it provides more enabling pathways for certain infrastructure and rural production, which is considered consistent with the broader intent of the NPS-NH.

Overall, no amendments to PC1 are anticipated at this stage, as it is considered to be well aligned with the intent and provisions of the proposed NPS-NH. However, the NPS-NH would apply to any plan changes and/or private plan changes that are initiated after gazettal in that any future plan changes would need to ensure that they give effect to the NPS-NH.

4.3. Impact on other Council Departments and Projects

As with all national policy statements, the requirement to “have regard to” the NPS-NH will apply to consenting decisions. This means that both the provisions of PC1 and the policy direction set out NPS-NH will apply in making decisions on resource consents. Given the strong alignment between the risk management framework in the proposed NPS-NH and the provisions of PC1, it is anticipated that the integration of the NPS-NH into consent assessments will not result in significant conflicts.

However, implementation may require some upskilling within Council’s RMA Consents Department to ensure staff are confident in interpreting and applying the NPS-NH.

No further impacts on other Council departments and projects have been identified at this stage. We will continue further engagement with other Council departments over the coming weeks.

5. Package 1 – National Environmental Standards for Granny Flats (NES-GF)

5.1. Overview of Proposal for Consultation

A new National Environmental Standard and amendments to the Building Code are proposed to increase the supply of affordable housing options, by providing more permissive consenting pathways under the Resource Management Act 1991 and Building Act 2004 for 'granny flats'. While the reform discussion documents refer to 'granny flats', the proposals are not limited to dwellings for older New Zealanders or family members with the term, being applied more broadly to apply to smaller secondary residential units (Minor Residential Units).

Presently, the central government is only seeking feedback on the NES-GF proposal. Final policy decisions (following a separate process under the Building Act) have already been made in relation to changes to the building code. These are expected to be in force by early 2026.⁵

Currently, building a minor residential unit requires a building consent and may also require a resource consent depending on the scale of what is proposed and where building is to occur. The permitted pathway proposed under the NES-GF and the building consent exemption pathway under the changes to the Building Code are intended to align and work in tandem. The proposed policy settings for an exemption under each consenting regime are summarised below:

Resource consents	Building consents
<p>A permitted activity pathway under NES-GF would override district plans if the following conditions are met:</p> <ul style="list-style-type: none"> • net floor area of 70m² or less; and • one minor residential unit per site; and • 2m minimum setback from principal residential unit; and • meets minimum boundary setbacks (2m in residential zones and 5m/10m in rural zones); and • 50 per cent maximum building coverage applies in residential, mixed-use and Māori-purpose zones. No limit in rural zones. <p>District plan overlay provisions still apply, e.g. Outstanding Natural Landscapes, earthworks, setbacks from transmission lines, and natural hazards.</p> <p>Councils cannot apply the following standards to minor residential units:</p> <ul style="list-style-type: none"> • requiring individual outdoor space • privacy, sunlight, glazing • parking, access. 	<p>A building consent exemption pathway under the Building Code would apply if the following conditions are met:</p> <ul style="list-style-type: none"> • net floor area 70m² or less; and • single storey, standalone and self-contained; and • criteria for construction materials, plumbing, drainage and heating conditions; and • work must be done by a Licensed Building Practitioner. <p>All building work must comply with the Building Code, even if it is exempt from a building consent. An engineering report is still required.</p> <p>A Project Information Memorandum (PIM) from Council is required and all relevant documentation and any development contributions must be provided to council within 20 working days of completion. Failure to do so may result in:</p> <ul style="list-style-type: none"> • An infringement offence • A requirement to get a building consent.

⁵ Proposed building consent exemption for small standalone dwellings: <https://www.building.govt.nz/getting-started/building-system-reforms/granny-flats>

5.2. Impact on Current District Plan Review and Work Programme

If progressed, the proposed NES-GF would have immediate legal effect and councils will not be required to undertake plan changes to implement it. The proposed NES-GF provisions would override the relevant District Plan provisions.

Should Council wish to streamline the District Plan provisions for minor residential units to better align them with the NES-GF, extensive changes to the District Plan would be required. There are numerous provisions throughout the zone chapters applicable to minor residential units that are currently more stringent than those proposed by the NES, including topics such as:

- Building and Major Structure Coverage
- Outdoor living courts
- Setbacks
- Sunlight
- Privacy

5.3. Impact on other Council Departments and Projects

Impacts on the RMA Consents department

The proposed NES-GF lacks clarity on some key aspects that could result in uncertainty for the resource consent process as discussed below.

Currently, in the Medium Density Residential Zone and the General Residential Zone, it is permitted to have two residential units on a site (one of which may be a minor residential unit) with no maximum floor area being applied to minor residential units. It is unclear whether the proposed NES-GF would create capacity to add at least one granny flat on such sites, and possibly two (one per each principal residential unit) in addition to the two residential units that are currently permitted. If no guidance is provided this may create confusion on the resource consenting space.

Where a development does not meet one or more of the permitted activity standards under the NES-GF, existing district plan rules for minor residential unit development would apply. It is also envisaged in the NES-GF that district plans may set more lenient permitted criteria than the NES. However, it is unclear how these two aspects will be reconciled in practice. For example, if the proposed minor residential unit exceeds 70m² maximum floor area, but the district plan has no limit on floor area, it is not clear whether this would be considered non-compliance with NES standards (requiring assessment under district plan rules) or if meeting the more lenient district plan standard would be deemed as compliance with the NES. The implication of the above is that a significantly larger “granny flat” (e.g. 100 – 150 m²) may be able to become established due to defaulting to the more lenient floor area provisions, but without the requirement to consider any of the adverse effects arising from the increased bulk and dominance of such a building (compared to a 70m² one), particularly shading, privacy and access. There is also no consideration of urban design outcomes, nor any measures to ensure the additional housing will continue being used for residential purposes as opposed to being converted to commercial use as visitor accommodation (e.g. Airbnb).

As neither NES-GF nor NPS-Infrastructure offer guidance on resolving conflicts between national direction, difficulties may arise when attempting to reconcile the NES-GF with objectives and policies of the rural zones. Currently the District Plan seeks to avoid fragmentation of productive rural land. As part of this, the permitted rule criteria limit the overall scale of minor residential units in rural zones by managing their size, design, and location to ensure they are ancillary to the principal residential unit on site. A key component of this policy framework is the limit on a separation distance of not more than 15m between the minor residential unit and the principal residential unit. It would appear that the 15m separation distance is not strictly contrary to the proposed NES-GF, which prescribes only a minimum setback distance from the principal residential unit (2m). Nevertheless, a level of ambiguity remains that could complicate resource consent assessments

Impacts on the Building Consents department

There is a perceived risk of increased levels of sub-standard building works happening in our district resulting from the removal of our regulatory involvement in construction of these buildings. The Building Department holds concern about any move that effectively delivers increased risk to occupants' safety or jeopardizes good housing outcomes for the community. That said, under the Building Act Council holds no direct responsibility or liability for these outcomes. The actual extent of non-compliant work may be not evident until a considerable time after the legislative change is made. Owners still will have the ability to choose to apply for a Building Consent for construction of these buildings if they wish.

The homeowners are required to provide councils, within 20 working days on completion of work, a set of plans for building, plumbing and drainage work, the final designs the home was built to, and all relevant records of work, certificates of work, certificates of compliance, electrical safety certificate and gas safety certificate from licensed building professionals. However, this is set up as an administrative process only, meaning that Councils cannot review built plans to determine if a small standalone dwelling complies with the Building Code. Nevertheless, for the Building Compliance Team it may follow that there is an increased workload as a result of the regulatory change in investigating building works that do not meet the exemption requirements (but are purported to by owners/tradespeople) or taking action to address substandard building works. This work may incur additional staffing costs for Council that it does not currently have a mechanism for which to recover costs.

The projected number of small dwellings that will be built utilizing these new provisions is open to speculation and could widely vary. During the submissions period about the Building Act changes there were concerns raised by various lending institutions and the Insurance Council about their ability/willingness to lend against and insure the resultant buildings without the surety of independent regulatory oversight of the construction works from the Building Consent Authority (BCA). If there are barriers or increased difficulties in obtaining finance or insurance for these small dwellings, the actual number of buildings that are constructed under these provisions could be low. Such barriers may mean the construction of these buildings is limited only to instances where owners have available cash to finance the build, and/or be willing to either self-insure, or have limited or costly insurance policies - to save \$4431 (MBIE consenting cost-saving estimate).

Currently under the Building Act, Code Compliance Certificate (CCC) is not issued until the development contributions are paid, effectively incentivizing payment. On the other hand, the mechanism for payment of development contributions for minor residential units constructed under the Building Code exemptions is unclear. Whilst the conditions for an exemption from building consent include a requirement to obtain a PIM and a requirement to pay development contributions within 20 working days of completion of building work, there is a lack of appropriate enforcement levers under the proposed regime. Notably, it is unclear when building work is considered completed, and what actions would be available to Council if the minor residential unit is occupied prior to completion.

Infrastructure servicing

General Residential Zone and Medium Density Residential Zone land within the District Plan already enables two residential units on any site, provided permitted rule criteria are met (e.g. setbacks). Depending on the final wording of the proposed NES-GF it may be that an additional minor residential unit is provided for on any site, regardless of the number of existing residential units. This could create unanticipated impacts on waters infrastructure and roading in these zones – leaving Council with very little opportunity to respond to the increased demand.

Strategic Planning

While solutions to the housing crisis are urgently needed, the proposed NES-GF risks poor outcomes due to a lack of strategic, integrated planning.

There is potential opportunity cost to the uptake of comprehensive redevelopment on suitable sites, particularly in mixed-use zones and other medium to higher density zones. Minor residential units could fragment land through future subdivision, reducing the viability of redevelopment aligned with the Whangārei Future Development Strategy, which prioritises intensification within the city centre and urban centres to support better housing and business outcomes. The Future Development Strategy seeks greater alignment of infrastructure planning and investment. Reducing this ability for strategic planning will undoubtedly cause challenges for Council. While an increase in housing supply is an important goal, a balanced outcome would be preferable, particularly in an environment such as Whangārei where there are development opportunities under existing planning settings.

Additional concerns requiring further consideration include:

- Risk of poor amenity outcomes, such as access to sunlight and outdoor space.
- Ability to direct residential intensification along public transport corridors.
- Infrastructure servicing where development happens out of step with three waters network capacity.

As with all national environmental standards, the requirement to “have regard to” the NES-Granny Flats will continue to apply to consenting decisions.

No further impacts on other Council departments and projects have been identified at this stage. We will continue further engagement with other Council departments over the coming weeks.

6. Package 1 – National Environmental Standards for Papakāinga (NES-P)

6.1. Overview of Proposal for Consultation

Government is seeking to introduce a new National Environmental Standard that applies to the whole of New Zealand to address the challenges related to affordable housing supply by enabling development of whenua Māori and supporting positive social and economic outcomes for whānau Māori.

The proposal seeks to provide a consistent baseline for what is permitted when carrying out papakāinga development, across different local authorities. The NES-P will provide for a limited scale of permitted papakāinga development on Māori freehold land and certain categories of general land owned by Māori.⁶

The NES-P aims to provide for both residential and ancillary activities as part of papakāinga development. The permitted activities and standards in the NES-P will provide a clear framework for assessing smaller Papakāinga development as a permitted activity, as well as added detail to what should be considered in restricted discretionary proposals.

Where a District Plan is more lenient than the NES-P, the District Plan will take precedence over the NES-P.

The permitted activities and standards are summarised as follows:

- Development of up to 10 residential units in rural, residential and Māori purpose zones.
- Certain non-residential activities that are directly associated with the residential activities, including cultural activities (marae, urupā, māra kai).
- Maximum building coverage of 50% of the site in residential and rural zones.
- Minimum setbacks from site boundaries:
 - Front setbacks of 1.5m and all other setbacks 1m in residential zones.
 - All setbacks 3m in rural zones.
 - Same setbacks as Māori purpose zone, where this zone is used.

The following applicable rules of the underlying zone from the Whangārei District Plan will also continue to apply:

- Setbacks from waterways and rail corridors.
- Building height
- Earthworks
- Permeable surfaces
- Lighting
- Noise
- Accessways
- Wastewater and water supply
- Natural hazards
- Relocatable buildings
- Green infrastructure

Where a papakāinga development cannot meet the permitted standards of the NES-P or underlying zone provisions, a restricted discretionary resource consent will be required. The

⁶ This includes (a) land that was previous Māori freehold land and is beneficially owned by the persons who beneficially owned the land immediately before the land ceased to be Māori land, or their successors, or (b) land owned by Māori that has ceased to have Māori land status in accordance with an order of the Māori Land Court made on or after 1 July 1993, or under Part 1 of the Māori Affairs Amendment Act 1967, or because it has at any time been acquired by the Crown or any local or public body for a public work or other public purpose and has been subsequently returned to its former Māori owners or their successors.

matters of discretion relate to things like building coverage, site design and impacts on neighbouring properties, and the extent to which alternative options are available for the Papakāinga development.

6.2. Impact on Current District Plan Review and Work Programme

The Papakāinga chapter in the Whangārei District Plan is not due to be reviewed until 2028. The inclusion of a definition of Māori ancestral land will provide more clarity of where Papakāinga development can occur on General land owned by Māori (rule PKA-R3 of the Whangārei District Plan).

There is potential for the final form of the NES-P to impact policy direction for work being undertaken as part of the Matters of Importance to hapu plan review. It is noted that the Package 1 Infrastructure and Development Discussion Document⁷ highlights that:

Consultation will be necessary to test whether iwi, hapū and other Māori groups have concerns about the proposal or any perceived impacts on sites of significance to Māori, marae, Māori land, land returned under Treaty settlements or other matters of significance to Māori groups.

This indicates that further, targeted consultation on the proposal may be imminent. Close attention should be paid to the outcome of this consultation to identify if there are any implications for the Matters of Importance to Hapū plan review.

6.3. Impact on other Council Departments and Projects

Once the final version of the proposed NES-P has been published, it will have immediate legal effect, meaning Council staff will need to consider it in decision making for resource consent applications.

Both the NES-P and District Plan provisions would need to be used to assess a Papakāinga development. This has the potential to create confusion when identifying which rules are applicable to decision making on whether a resource consent is required.

The NES-P requires regular reporting to the Ministry for the Environment (MfE) on the number of Papakāinga developed under the permitted framework and any other implementation issues. It is assumed that this reporting will be in addition to what is requested annually by MfE through the National Monitoring System and as such will create additional administrative tasks for the Resource Consents department.

A process for capturing and recording data about Papakāinga development that has been carried out through the NES-P permitted framework within the district would likely be necessary to support monitoring requirements. Capturing this data would likely become a responsibility of the Property Assessment Team as part of processing an application for a Property Information Memorandum or carrying out a planning assessment on a Building Consent Application.

6.4. Additional Impacts/ Risks

The Papakāinga provisions of the Whangārei District Plan are relatively enabling, and the NES-P would have limited impact on the ability for Papakāinga development to be undertaken within the district. Specifically, may enable a degree of additional density on some smaller sites, albeit

⁷ Page 64, found here: [package-1-infrastructure-and-development-discussion-document.pdf](#)

capped at 10 dwellings plus ancillary activities per site. Furthermore, the NES may apply to a limited number of additional sites that are not covered by the District Plan Papakāinga provisions.

The District Plan provides a permitted pathway for Papakāinga on Māori Freehold Land (in all zones except the Heavy Industrial zone) where:

- A Papakāinga Development Plan is submitted to Council prior to a building consent being lodged that demonstrates compliance with a maximum density of 1 residential unit per 2,000m²
- The underlying zone and District wide rules apply, where a 'like for like' rule is not specified in the permitted pathway.
- Compliance with the access and servicing requirements of the Transport and Three Waters provisions of the District Plan is achieved.
- Limited non-residential uses are also provided for.

Approximately 26% of whenua Māori and general land owned by Māori may benefit from the more enabling density provisions of the NES-P, as it enables 10 residential units regardless of site size provided that the maximum building coverage does not exceed 50%. However, because most of the Māori land blocks are within the Rural Production zone, these land parcels (particularly smaller land blocks) will be required to comply with the more restrictive underlying zone provisions for on-site wastewater disposal.

The permitted standard for access under the District Plan is also limited to 8 residential units per shared access, and so the full extent of the permitted density for residential units under the NES-P is not possible for proposals that include 8-10 residential units.

The building setback and coverage standards in the NES-P may result in development outcomes that are not anticipated in the rural zone and reverse sensitivity matters (e.g., intensive rural production activities) are not considered in the NES-P.

There is no reference to Māori Land Court processes for use of land that are required to be fulfilled in addition to those under the Resource Management Act 1991 and the Building act 2004. One of the current barriers to Papakāinga development is the complexity and cost of these processes for Māori landowners.

There is an opportunity for the NES-P to provide permitted standards for access and three waters management rather than relying on the provisions of the relevant District Plan. Including these would further streamline the administrative process of implementing the NES-P.

7. Package 2 – Amendments to the National Policy Statement for Highly Productive Land 2022 (NPS-HPL)

7.1. Overview of Proposal for Consultation

The National Policy Statement for Highly Productive Land 2022 (“NPS-HPL”) came into effect in October 2022 to protect highly productive land (“HPL”) for primary production activities. The NPS-HPL establishes that HPL is land that is identified as Land Use Capability (“LUC”) Class 1, 2, or 3. Under the NPS-HPL regional councils are currently required to map HPL and notify plan changes to regional policy statements to include the HPL maps by October 2025.

The amendments proposed to the NPS-HPL include:

- Removing references to LUC 3 from the NPS-HPL and from how HPL is defined with immediate effect. This would mean that only LUC 1 and 2 land would be identified as HPL.
- Considering changes to the mapping criteria for HPL to identify ‘special agriculture areas’, which would apply to areas that are regionally or nationally significant for food production.
- Considering whether to extend timeframes for regional councils to map HPL or suspend mapping and incorporate it into the replacement resource management system instead.
- Providing a more enabling framework for mineral extraction and ancillary activities on HPL.

7.2. Impact on Current District Plan Review and Work Programme

It is considered that the proposed amendments to the NPS-HPL have no impact on the current district plan review and work programme topics.

After the Northland Regional Council has included the HPL maps within the Northland Regional Policy Statement, a plan change would be required to the Whangārei District Plan to implement the NPS-HPL. The decision on whether to either extend or suspend the timeframes for regional councils to map HPL would impact if, and when, amendments may be required to the Whangārei District Plan to give effect to the NPS-HPL.

It is noted that the Operative Whangārei District Plan includes the term “highly versatile soils”, which includes LUC 3. If the NPS-HPL is amended to remove reference to LUC 3 then it could create a misalignment between the NPS-HPL and the Operative Whangārei District Plan. A plan change would not be required to address this until after the Northland Regional Council has included the HPL maps within the Northland Regional Policy Statement; however, in the interim it could create uncertainty when processing resource consents.

7.3. Impact on other Council Departments and Projects

As with all national policy statements, the requirement to “have regard to” the NPS-HPL will continue to apply to consenting decisions.

The Whangarei District Council and Northland Regional Council recently adopted the Whangārei Future Development Strategy, laying out a comprehensive vision for managing growth over the next 30 years. The Strategy clearly articulates that well-functioning urban environments cannot be achieved if growth and development is at the expense and loss of HPL. Submissions received through the Strategy’s public consultation from primary sector stakeholders (Fonterra, NZ Horticulture) raised similar concerns, particularly around the reverse sensitivity issues arising from

encroaching urban development⁸. Excluding LUC 3 from the definition of HPL could compromise the outcomes sought in the Strategy.

No further impacts on other Council departments and projects have been identified at this stage. We will continue further engagement with other Council departments over the coming weeks.

7.4. Additional Impacts/Risks

Excluding LUC 3 from the definition of HPL would have major implications for the Whangārei District, where LUC 1 and 2 land is scarce (1.6% of rural and rural production zoned land) and LUC 3 (7.3%) comprises most of the current HPL land. Only 8.9% of Whangarei District's land is categorised as highly productive (under the transitional definition), whereas about 15% of New Zealand's land is categorised as highly productive.⁹

Removing LUC 3 from the NPS-HPL would significantly impact Council's ability to impose planning provisions or spatial planning mechanisms to protect that LUC 3 land for primary production activities. This could significantly compromise the availability of most of our productive soils for food and fibre production.

While addressing the housing crisis is important, it is equally vital to protect – and restore – land for primary production. Since both urban development and primary production require similar land characteristics – such as low slope, good soil conditions, and proximity to key transport routes and infrastructure – the NPS-HPL should offer clear and strong guidance to balance these competing land uses appropriately.

⁸ See page 32 of Draft FDS - Summary of Feedback Report. (2024). <https://www.wdc.govt.nz/files/assets/public/v/1/documents/council/strat-program/fds/summary-of-feedback-report.pdf>

⁹ Ministry for Primary Industries. (2023). <https://www.mpi.govt.nz/agriculture/farm-management-the-environment-and-land-use/national-policy-statement-for-highly-productive-land/>

8. Package 2 – Amendments to the New Zealand Coastal Policy Statement 2010 (NZCPS)

8.1. Overview of Proposal for Consultation

The New Zealand Coastal Policy Statement 2010 (“NZCPS”) provides national direction on managing the coastal environment to achieve the purpose of the Resource Management Act 1991 in relation to the coastal environment.

The proposed amendments to the NZCPS are aimed at making the policies more directive enabling for certain activities (specified infrastructure, renewable electricity generation, electricity transmission, aquaculture and resource extraction) within the coastal environment. Currently, these activities must satisfy a “functional needs” test, whereby it must be demonstrated that the activity can only occur in the coastal environment. The proposed amendments seek to expend this to a “functional need or operational need” test, which will enable decision-makers to also consider any technical, logistical or operational characteristics or constraints (e.g., time, cost, and safety).

It is also proposed to amend the NZCPS to make it easier to consent new aquaculture activities and to specifically provide for aquaculture activities within aquaculture settlement areas gazetted under section 12 of the Māori Commercial Aquaculture Claims Settlement Act 2004.

8.2. Impact on Current District Plan Review and Work Programme

The proposed amendments to the NZCPS are not expected to affect the current district plan review or work programme. However, if progressed the proposed amendments could create misalignment between the NZCPS and the Coastal Environment chapter of the Whangārei District Plan (which was made operative in 2019 to give effect to the current NZCPS). However, the proposed amendments would not require the Whangārei District Plan to be amended. Instead, it is envisaged that any misalignments would be addressed through the transition to the new Resource Management System following the replacement of the Resource Management Act 1991.

8.3. Impact on other Council Departments and Projects

As with all national policy statements, the requirement to “have regard to” the NZCPS will continue to apply to consenting decisions.

The proposed amendments may result in more proposals for specified infrastructure, renewable electricity generation, electricity transmission, aquaculture and resource extraction within the coastal environment. If there are misalignments between the Whangārei District Plan and the amended NZCPS, it could create uncertainty and disputes when processing these resource consents.

No further impacts on other Council departments and projects have been identified at this stage. We will continue further engagement with other Council departments over the coming weeks.

9. Package 2 – Amendments to the National Environmental Standards for Commercial Forestry 2023 (NES-CF)

9.1. Overview of Proposal for Consultation

The National Environmental Standards for Commercial Forestry 2023 (“NES-CF”) provide nationally consistent regulations to manage the environmental effects of commercial forestry. Regional and district councils are responsible for implementing and enforcing the NES-CF regulations. District plan rules can be more stringent than the NES-CF in certain circumstances.

The amendments proposed to the NES-CF broadly seek to encourage and enable more forestry by:

- Being more specific about the criteria for when councils can impose stricter rules than the NES-CF and removing councils’ broad discretion to have more stringent rules.
- Introducing a slash management risk assessment approach.
- Removing the requirement for afforestation and replanting plans.

If progressed, the proposed changes to the NES-CF would have immediate legal effect.

9.2. Impact on Current District Plan Review and Work Programme

It is considered that the proposed amendments to the NES-CF have no impact on the current district plan review and work programme topics. However, if progressed it is likely that the district plan would need to be amended to align it with the NES-CF. Section 44A of the Resource Management Act 1991 enables this work to be undertaken without a Schedule 1 plan change, either in accordance with a specification in the NES-CF, or as soon as practicable after the date that the amendments come into force. This work is not included in the current work programme but may need to be planned for if the amendments to the NES-CF are progressed.

9.3. Impact on other Council Departments and Projects

The proposed amendments to the NES-CF are generally aimed at making the current rules for commercial forestry clearer and more certain. As with all national environmental standards, the requirement to “have regard to” the NES-CF will continue to apply to consenting decisions.

No further impacts on other Council departments and projects have been identified at this stage. We will continue further engagement with other Council departments over the coming weeks.

10. Package 2 – Amendments to the National Environmental Standards for Marine Aquaculture 2020 (NES-MA)

10.1. Overview of Proposal for Consultation

Marine aquaculture is primarily managed by the Resource Management Act 1991 and associated National Direction such as the New Zealand Coastal Policy Statement and the Resource Management (National Environmental Standards for Marine Aquaculture) Regulations 2020 (“NES-MA”). The NES-MA came into effect in 2020 with the intent of providing a more consistent and efficient approach to managing marine aquaculture, including replacement consents, farm realignments, and changes to farmed species.

The proposed amendments to the NES-MA seek to:

- Remove some restrictions that apply when reconsenting marine aquaculture activities.
- Set out a more lenient activity status for certain changes to consent conditions for existing marine aquaculture consents.
- Make the rules for research and trial activities for aquaculture more permissive.

If progressed, all proposed changes to the NES-MA would have immediate legal effect.

10.2. Impact on Current District Plan Review and Work Programme

Managing marine farms and marine aquaculture activities is a function of regional councils. The NES-MA therefore replaces regional council rules and does not relate to district council rules. Therefore, the proposed amendments to the NES-MA have no impact on the current district plan work programme and would not require any changes to the Whangārei District Plan in the future to ensure alignment with the national direction.

10.3. Impact on other Council Departments and Projects

The proposed amendments to the NES-MA are generally aimed at making the current rules for marine aquaculture more enabling. It is possible that if progressed the amendments could result in an increase in aquaculture activities and research and trial activities for aquaculture within the District.

As with all national environmental standards, the requirement to “have regard to” the NES-MA will continue to apply to consenting decisions.

No further impacts on other Council departments and projects have been identified at this stage. We will continue further engagement with other Council departments over the coming weeks, however as marine aquaculture is managed by regional councils it is unlikely that the proposed amendments would have direct impact on other Council departments and projects.

11. Package 2 – Amendments to the Resource Management (Stock Exclusion) Regulations 2020

11.1. Overview of Proposal for Consultation

The Resource Management (Stock Exclusion) Regulations 2020 aim to mitigate environmental risks posed by livestock entering water bodies, which can negatively affect freshwater ecosystems, human health, and cultural values. The Stock Exclusion Regulations currently require that all livestock must be kept out of any natural wetland that supports a population of threatened species.

Government is proposing to amend the regulations to remove the requirement to exclude grazed beef cattle and deer in low intensify farm systems from these wetlands.

11.2. Impact on Current District Plan Review and Work Programme

The proposed amendments to the Resource Management (Stock Exclusion) regulations have no impact on the current district plan work programme and would not require any changes to the Whangārei District Plan in the future to ensure alignment with national direction.

11.3. Impact on other Council Departments and Projects

It is considered that the proposed amendments have no direct impact on other Council departments and projects. The Resource Management (Stock Exclusion) Regulations are primarily managed by regional councils, and the proposed amendments are limited in scope and targeted at wetland management, which is a regional council function.

12. Package 2 – Mining and Quarry provisions in Multiple National Direction Instruments

12.1. Overview of Proposal for Consultation

Government is proposing amendments to the following National Direction instruments to streamline the consent processes and gateway tests for quarrying and mining activities impacting wetlands, significant natural areas, and highly productive land:

- National Policy Statement for Indigenous Biodiversity 2023 (“NPS-IB”)
- National Policy Statement for Highly Productive Land 2022 (“NPS-HPL”)
- National Environment Standard for Freshwater 2020 (“NES-F”)
- National Policy Statement for Freshwater Management 2020 (“NPS-FM”)

The amendments broadly seek to make the provisions within these instruments more enabling and more consistent for quarrying and mining activities and essential ancillary activities (e.g. accessory buildings, parking areas, and storage).

12.2. Impact on Current District Plan Review and Work Programme

The proposed changes to the NPS-IB will need to be considered as part of the current Ecosystem and Indigenous Biodiversity District Plan review. The expected timeframe of this District Plan review will align well with Central Government’s timeframe and will allow appropriate time to incorporated changes as needed.

Other changes to National Direction instruments relating to quarrying and mining activities are not considered to directly impact the current district plan work programme and are unlikely to require any changes to the Whangārei District Plan to ensure alignment with national direction.

12.3. Impact on other Council Departments and Projects

As with all national environmental standards and national policy statements, the requirement to “have regard to” them will continue to apply to consenting decisions.

No further impacts on other Council departments and projects have been identified at this stage. We will continue further engagement with other Council departments over the coming weeks.

13. Package 3 – Amendments to Freshwater National Direction

13.1. Overview of Proposal for Consultation

National Direction for freshwater currently includes the following:

- National Policy Statement for Freshwater Management 2020 (“NPS-FM”)
- Resource Management (National Environmental Standards for Freshwater) Regulations 2020 (“NES-F”)

Government is consulting on potential options to amend the NPS-FM and NES-F to “better reflect the interests of all water users”.

Significant changes to the NPS-FM are being considered, including:

- Changes to the role of “Te Mana o Te Wai”.¹⁰
- The reintroduction of multiple objectives that would see water quality balanced with other considerations like economic opportunities and costs and community expectations.
- Changes to provide more flexibility in freshwater management, including by giving councils more flexibility to decide on environmental limits and bottom lines.
- Changes to simplify wetland regulation, including to provide greater certainty to farm operators about the activities that can be done in or around a natural inland wetland.
- Changes to better enable the continued domestic supply of fresh vegetables, and provide for crop rotation (alternatively this may be done through new national standards on commercial vegetable growing).

The amendments proposed to the NES-F include options on how to best simplify requirements around fish passage, nitrogen fertiliser, wetlands, and culverts.

The consultation material does not set out detailed amendments to the NPS-FM and NES-F. Instead, it sets out issues and options for consultation. It is understood that there will be a further round of consultation in late-2025 with more detailed proposals.

13.2. Impact on Current District Plan Review and Work Programme

As the consultation material is focused on options for consideration rather than proposed amendments, it is considered that the proposals have no impact on the current district plan review and work programme topics. Furthermore, the NPS-FM and NES-F primarily relate to functions of regional councils and have limited direct impact on district plans.

13.3. Impact on other Council Departments and Projects

As with all national environmental standards and national policy statements, the requirement to “have regard to” the NES-F and NPS-FM will continue to apply to consenting decisions.

No further impacts on other Council departments and projects have been identified at this stage. We will continue further engagement with other Council departments over the coming weeks.

¹⁰ Te Mana o te Wai is a concept that refers to the fundamental importance of water and recognises that protecting the health of freshwater protects the health and well-being of the wider environment.

13.4. Additional Impacts/Risks

The options for consultation on Freshwater National Direction represents some of the most significant changes to the status quo across all of the current Packages 1 – 3. For example:

- “Te Mana o Te Wai” is a fundamental concept of the current National Direction. Replacing or removing it would represent a significant change to freshwater management going forward. This could reduce the priority given to the health and well-being of freshwater and instead could focus on economic opportunities and community expectations.
- Providing more flexibility for Councils could be beneficial and allow for more local input and variance. However, this could result in a less consistent and holistic management approach across regions and will require more resourcing at local levels to develop local standards.
- Amending the regulations for wetlands could weaken the ability to protect and restore these areas for their biodiversity, water quality, and overall environmental health and could lead to cumulative degradation of wetlands.

While these changes may not have a direct impact on Whangārei District Council’s functions and responsibilities, they could have significant impacts on environmental, cultural, and social outcomes in the district.