

Regionally significant issues for Auckland: A think piece

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This report was prepared by: Gerard Willis

Enfocus Limited
451 Mt Eden Road
Private Bag MBE M251
Auckland

(Ph) 09 630 2300
(Mb) 021 630 310

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1 Introduction

This paper has been prepared as a think piece on the key issues to be addressed in the proposed Auckland Regional Policy Statement 2010.

It has been drafted to stimulate discussion about how the second generation RPS might be shaped. It is based on author's knowledge and publicly available information. It has not involved new research nor has there been wide canvassing of the views of experts.

2 What's a regionally significant issue?

Section 62 of the Resource Management Act (RMA) requires that regional policy statements (RPSs) include "*the significant resource management issues for the region*".

The term "resource management issue" is not defined by the Act itself. However, it is generally held that an issue is:

- An existing or potential (including likely future) *problem* with the state or current use and development of a resource(s) that justifies intervention to ensure the promotion of the Act's purpose (being sustainable management of natural and physical resources); or
- The inability to realise a resource management *outcome* that is consistent with the purpose of the Act without intervention.

Such issues must be "*significant...for the region*". Again, there is no statutory guide as to what that might mean, however, it is generally interpreted as meaning that the issue will be of significance to the *regional community* rather than just a local community.

That does not, however, say that an issue need occur in all parts of the region for it to be regionally significant. For example, an issue may be restricted to a single, contained location but still be regionally significant because the values at risk are widely recognised. Conversely, an issue might be occurring region-wide but not be considered significant for the region in the broader scheme of the issues faced by that region.

It is also important to recall that the purpose of an RPS is "*to achieve the purpose of the Act by providing an overview of the resource management issues of the region and policies and methods to achieve integrated management of the natural and physical resources of the whole region*" [emphasis added].

Thus the Act would tend to suggest that the issues identified in RPSs are not to be a comprehensive account of all resource management problems experienced in the region. Rather they will be a subset of those issues based on (a) "significance"; and (b) whether their resolution requires an *integrated response*. By integrated response, we mean the marshalling of multiple *functions* and/or of multiple *agencies* to achieve an effective resolution¹.

¹ For a fuller description of integrated management in the context of RPSs see Appendix 1.

RPSs are about *integrated* management, hence they sit at the top of the sub national policy hierarchy to be implemented by regional and district plans (and other non statutory methods). It may well be argued that if regional issues required simple, single function, single jurisdiction responses then they could be adequately addressed by regional plans. The system provides for RPSs because certain resource management issues require more complex responses and it is those issues on which the RPS should focus.

3 Identification and organisation of issues

3.1 Issues in the first generation RPS

■ *Functions as an organising themes for issues*

The first generation RPS identifies issues by function². That is, functions set out in section 30 (and in section 62) of the Act are the main organising themes for issues, objectives and policies. The approach tends to assume (not irrationally) that if the Act prescribes a function there must be issue or potential issue and therefore policies and methods are developed accordingly.

This approach is understandable and probably logical, at least for first generation RPSs, since the exercise of functions (particularly, in the absence of regional plans, consideration of consent applications) needed some framework within which to be carried out.

However, the approach was not strategic in the sense that it did not involve prioritisation of issues.

■ *Linear relationships between issues, policies and methods*

The other significant characteristic of all first generation RPSs is that they promote a *linear relationship* between issue, objective, policy and method. That is, they suggest that issues exist independently of one another, that each issue has a unique objective and a unique policy response. That approach was promoted in the 1990s to achieve rigour in policy development.

Experience has reminded us, however, that environmental management is wildly interconnected. In reality, issues and their responses represent a *network relationship*. That is, one policy response can address, in whole or part, multiple issues. An effective response to one issue can involve addressing a variety of diverse objectives and one issue can require policy responses across many functional areas.

That should be of no great surprise and is, as suggested earlier, why RPSs exist. That is, RPSs exist because the narrow exercise of functions (through, for example, single issue regional plans) cannot recognise the interconnections or promote the integrated policy response necessary to effectively resolve issues.

In some respects Chapter 2 of the RPS recognises this more than most other RPSs since it [implies] that urban growth affects multiple resources and that the control of urban growth is an important response to multiple issues.

² The current RPS even focuses on some matters which are functions under other legislation (namely pests and transport)

The challenge for second generation RPSs is to organise issues, objectives, policies and methods in such a way as to recognise the interconnectedness of the environment and the necessary management responses. Chapter 2 of the RPS represents a reasonable attempt at this but only so goes so far. Not all regional issues are addressed by managing urban growth.

The second generation RPS might usefully extend the approach to promote integrated strategies that address issues not dealt with by land use control of urban growth.

▣ *Validity of existing issues*

Even a cursory review of the contents of the current RPS reveals that all the issues identified remain valid to some extent. That is, almost all the issues identified in the early 1990s remain in the sense that they have not gone away or been solved and few of them ever will be. Most are focused on addressing on-going risk to the environment.

The question to be asked is not whether these matters are still issues but rather whether they are issues that need to be identified in the RPS, to have the priority afforded to them they did in 1993 or form the high level organising themes they do currently.

The issues of the current RPS are briefly reviewed in sections 4 and 5 of this report

▣ *A comprehensive or prioritised approach to issues*

Closely associated with the matters outlined above is the question of whether the RPS needs to be comprehensive in its identification of issues or, alternatively, focus on a narrower set of prioritised issues. As suggested above, for first generation RPSs (when there were few regional plans and no LTCCP equivalent to mandate management programmes) a comprehensive approach was probably necessary. With a good framework of regional plans and other region policy frameworks now in place, the RPS could arguably focus on a much narrower set of issues.

It is important to recall that regional plans do not need to be mandated through an RPS. Regional plans are prepared “to assist the regional council carry out any of its functions”. Therefore that fact that an issue may not have emphasis in an RPS does not mean it cannot be addressed by way of a regional plan.

3.2 Identification of issues for the second generation RPS

Issues are identified in many different ways. Often they are obvious to councils and little scoping is required. A general approach would be to scope all issues and then evaluate and prioritise them based on defined criteria.

As noted above, the criteria will focus on the question of significance and on the extent they require a genuinely integrated response.

It is important to note, however, that issue identification is not a purely technical exercise. What may be a problem for one person is not for others (and visa versa). Much depends on the lens through which the environment is viewed (whether it is coloured by deeply environmental, social, economic or a particular cultural perspectives).

■ *General approach to issue identification / review*

The general approach to scoping issues would be to consider three matters:

- Results of state of the environment monitoring. (What's been happening?)
- Statutory functions and purpose of an RPS. (What do we *have* to pay attention to?)
- The changing economic and social context (regional, national and global) within which resources are managed. (What might the future hold?)

The scope of this paper does not allow for detailed review of environmental monitoring information (of which there is a great deal). However, it is clear from a cursory review at what is being monitored and the general results of that monitoring, that key environmental issues for the region relate to sedimentation, freshwater quality, near shore (bathing beach) water quality, contaminated discharges (and subsequent accumulation of contaminants in marine sediments), biodiversity loss, and development “creep” with resulting loss of rural and coastal character and amenity values.

To this list air quality should perhaps be added not because monitoring indicates deterioration (in fact monitoring generally shows improvement in many air contaminants) but rather because of the importance of good air quality to Aucklanders (and the potential that still exists for health issues).

3.2.1 Statutory and policy frameworks

Many of the significant changes in the legislative environment were canvassed by ARC officers in the report to the Regional Strategy and Planning Committee in January 2008 and will not be discussed at length again here. However, briefly these include the following matters.

■ *Changes to Part 2 (sections 6 and 7) of the Act*

New and additional matters:

- The protection of historic heritage from inappropriate subdivision, use and development [s.6(f)]
- Recognised customary activities [s.6(g)]
- The efficiency of the end use of energy [7(ba)]
- Effects of climate change [7(i)]
- Benefits to be derived from use and development of renewable energy [7(j)]

■ *Changes to the functions of regional councils*

A new function of the *integration land use and infrastructure* has been added. Arguably the existing RPS's implementation of the ARGs would be regarded as meeting the new integration function. There does not appear to be major implications from this new function for the ARC or its RPS. Obviously the RPS will need to ensure that there is a close relationship between the RLTS and land use planning decisions. This will relate to both spatial and temporal (i.e. timing/ sequencing) matters.

Another new matter being the *maintenance of indigenous biodiversity* has also been added to the list of regional functions. The most interesting aspect of this new function is that it is the only function that contains within it an explicit objective (i.e. maintenance). Given the state of, and trends in biodiversity, the new function will be very challenging.

▣ *Changes to the required contents of regional policy statements*

Section 62 of the Act has been amended to require RPSs to include resource management issues of significance to iwi authorities (and the board of a foreshore and seabed reserve).

▣ *National policies*

In addition to the changes to the Act there is one operative NPS (on electricity Transmission) and two other draft NPSs (one on renewable electricity and the other on water) that will have implications for the issues that the RPS will need to address.

The RPS will need to include objectives, policies and methods to facilitate long-term planning for investment in transmission infrastructure and its integration with land use.

According to the draft NPS on renewable generation, the RPS may be required to enable existing renewable generation and new small scale renewable generation.

3.3 Changing Context

The context within which regional policy must be developed and implemented has changed at the local and global levels since the 1990s.

Locally, RMA practice evolved in many ways. Firstly there is a greater acceptance that sustainability (even the limited “sustainable management” under the Act) requires a *proactive* not purely *reactive* management response. That is, it is not simply about stopping “bad” activity but it is also about facilitating “good” activity.

Secondly, there is a much greater acceptance of the “urban” as a valid part of the environment to be managed. Thirdly, the RMA and in particular the RPS, is no longer seen as “the only horse running”. There are many more policy instruments to advance environmental issues at the regional level and much less need to try to mandate everything through RPSs.

However, it is at the global level that the big picture changes have occurred.

▣ *Global issues of the era*

There are three interconnected issues of the moment.

The first is *climate change*. While an issue in the 1990s it is only within the past few years that it has become widely appreciated that the developed world will respond by pricing carbon which will mean cost increases for carbon intensive goods and services (especially energy) that drive behavioural change on the part of consumers and technical innovation and technology shifts which bring down greenhouse gas emissions.

The second issue is that of so-called “*peak oil*”. The concept of peak oil is simple. At some point the world will produce its maximum daily (or yearly) oil output from which point on production will essentially plateau (and eventually decline). Global demand, on the other hand, will continue to increase such that demand outstrips supply leading to massive price raises. The rate at which this occurs will determine whether humanity can adapt new technologies and new behaviours or will be cast into social and economic chaos (as some of the more doomsday predictions suggest). Some suggest that the current substantial price hikes is evidence that peak oil is here. Others suggest that it not that case but that we are experiencing a fore-runner of just what it may be like.

That debate aside, it is clear that many of the world’s largest oil fields are in decline at a time when demand is growing strongly. New fields, should they be discovered, will be high cost producers. While the price of oil may very well fall again in the short to medium term, the long term trend of higher oil prices is clear. The era of cheap oil (<US\$70 per barrel) seems almost certainly over.

The third issue is global food supply. This is also widely attributed to the worlds’ reaction to climate change and high oil prices. Policies on mandatory blending of traditional diesel with bio diesel has led to the use of land in developed and developing countries for crops that can be used for the production of ethanol (biodiesel) displacing food crops (and in some places leading to loss of forests and biodiversity). That is of course only part of the reason for the current food “crisis”. Just as important are the more transitory issues such as political unrest and poor agricultural and trade policies. A lesser known, but perhaps more significant problem is that of the shortage of fertilisers particularly nitrogen (derived from burning natural gas) and to a lesser extent phosphate (mined from a relatively few locations).

▣ *So what happens next?*

There are basically two schools of thought for what will happen next. On the one hand, the optimists suggest that technological change will largely preserve current lifestyles.

In terms of private transport there are many technologies touted as the next best thing, the front runner by a considerable margin is the electric car. The electric car is a viable alternative (or will be when the battery range can be extended) and several car manufacturers will roll out electric models beginning in little more than five years. Provided such cars are charged with electricity from renewable sources, electric cars will help “solve” both the climate change and peak oil dilemmas (at least from a motorists’ perspective).

Larger engine vehicles (including agricultural and construction equipment), however, are not so suited to electric motive power (at least not with present technology). They are likely to have to rely on bio diesel, which, if derived from “second generation” bio-fuel technology need not disturb food producing potential. While this doesn’t sound too alarming (and may even have some environmental benefits) it still all means that everybody will be paying a lot more for their energy – particularly for their personal mobility.

The other scenario is less rosy. The “doomsday” scenario holds that the transition to electric (or any other sort of alternative transport³) will be too slow or, that oil will come into very short supply very quickly, that electric power cannot hope to replace the current widespread use of oil and that, in any event, electric cars are really just battery cars so that the energy to run them still has to come from somewhere.

NZ of course is blessed by considerable renewable energy resources and provided more can be tapped, electric vehicles would seem to make sense here more than just about anywhere else in the world. So, provided there is a large enough international market to drive research, development and production, NZ should (for the foreseeable future at least) have an alternative to fuel constrained, climate unfriendly personal mobility. That said, personal mobility will almost certainly be far more expensive in the future than it has been in recent years.

Peak oil and a rising price on carbon emissions will have implications well beyond the private motorist of course. Many industrial processes are oil dependent, pharmaceuticals, plastics, fertilisers and many other basic ingredients of modern life depend on an ample supply of fossil fuels. This has caused some commentators to predict very dire consequences. Others, however, point to vast potential energy sources, particularly coal, which if used with carbon capture and storage (CCS) technology offers fuel supplies for centuries with much lower but still ample oil supplies being diverted to alternative high value uses.

In short, the energy future remains murky with many different projections touted. About the only thing that is clear is the fuel prices will be higher with implications for personal mobility and for industrial processes that have come to rely on cheap energy.

Implications for regional policy

If the preceding discussion sounds interesting but not altogether relevant to regional policy think again. Land use (and the use of resources generally) is inextricably linked to energy availability and use. Historically cities and industries rose and fell on the availability energy - first wood, then charcoal, then coal, then oil and gas (and in New Zealand cheap renewable energy). Settlement patterns in New Zealand (and elsewhere) were determined in large part by the presence of ports and by how far a horse drawn vehicle (burning carbohydrate) could be pulled in a day. Early dairy factories and the settlements that sprang up around them were similarly determined by the distance/energy/time equation. It is planning folklore how milk tankers (using oil for energy meaning that could go further faster) revolutionised the collection of milk and sounded the death knell for hundreds of rural settlements that today only exist as names on maps. The post war industrialisation of agriculture made possible by the availability of cheap oil led to massive rural depopulation (and larger production units) as farms no longer relied on mass labour to work the land.

³ There are several other potential technologies including hydrogen, compressed air and coal derived “synthetic” fuel.

More relevantly for Auckland perhaps, the past 20 years (i.e. post 1970s oil shocks) trend toward rural lifestyle living has also been facilitated by fuel costs that until recently were at an historic low.

It is, of course, always dangerous for policy makers considering policies that will last a decade or more to focus on the issues of the day. If the 1990s futurists' view was to have been believed we would be all working remotely from paperless offices by now. Nevertheless the currently issues of climate change and a much more constrained energy world are of a different order and cannot be ignored. Short of major technological breakthroughs it is difficult to see these issues receding in importance in the years ahead.

So what might the implications be? It is tempting to focus solely on the obvious implication namely that people's desire to spend hours in cars burning high cost fuel will recede. This will of course reinforce the current policies supporting public transport, encouraging dispersed employment and in limiting rural residential development.

That is very likely one of the main implications. However, it is also important to recognise other potential trends:

- Individual households will want to be much more energy efficient
- Individual households will want to generate some of their own (renewable) energy
- There will be demand for renewable electricity generation at all scales (both grid connected and distributed)

The other trends that are commonly discussed relate to broader issues of the rural urban demographic balance. Some commentators have forecast the reversal of globalisation and a re-emergence of localisation in the production and consumption of goods and services. This would have significant demographic implications most notably a slowing or even reversal of the trend toward population centralisation and provincial and rural repopulation.

In particular, there is interesting debate about the future of agriculture which, as discussed, industrialised and "de-laboured" from the 1950s on as a result of low energy costs. A future of very high energy costs has caused some to suggest that rural areas will repopulate with greater local/dispersed processing and more on-farm labour requirements and associated rural servicing. A variant of that theory is that agricultural production will polarise between, on the one hand, large production units making use of economies of scale to overcome high energy costs and produce product for the international commodity markets. And, on the other hand, small "neo-peasant" production based around small units, with low energy, high labour inputs producing high value goods for largely local consumption. The family farm as it has been known will largely cease to exist under that scenario with viability being squeezed between the high energy/low energy production alternatives.

Of course it is impossible to say which (if either) scenario will pan out in reality. It does seem very likely that the social and economic networks of rural blocks will be less urban and more local than is currently the case.

4 Strategic Direction – growth management

The current Auckland RPS differs from other RPSs in one major respect. That is, of course, its' explicit and relatively directive management of urban development.

The place of urban growth management to an RPS can be, and has been, argued. The debate generally reflects the differing paradigms of land use planning (which emphasises spatial solutions to environmental problems) and other environment policy/science disciplines (which often promote alternate, non spatial, approaches). The issue does sit oddly in the structure of the RPS at present since urban growth management is more correctly characterised as an integrated policy response to a series of environmental issues rather than an issue in its own right.

Nevertheless, it is generally well accepted that you cannot begin to discuss the resource management issues for the Auckland Regional without first acknowledging the “elephant in the room” that is urban growth. After all urban land uses comprise about [25%] of the Auckland region and many of the most significant resource and environmental issues stem from the use and development of land for urban purposes.

4.1 Urban growth management to address extra-urban area effects

The traditional justification for managing growth relates to the need to manage (avoid) environmental impacts at the broad regional (or “strategic”) scale. In that sense growth management, or broad scale land use control, has been a strategic *method or approach* to dealing with a multitude of issues. These issues include the following matters.

- Urban expansion has effects on landscape, amenity values, biodiversity and Maori cultural and spiritual values as former rural areas are subsumed into urban Auckland;
- The process of land development (urbanisation) itself has multiple impacts including, in particular, leading to a pulse of additional sediment that is washed to the poorly flushing harbours of the region;
- The long term use of the areas for intensive urban uses has other implications including creation of additional stormwater (which will carry contaminants), waste water, generation of traffic, the pressure on infrastructure to deal with these and other on-going effects.

In short, the conversion and use of low intensity rural uses to high intensity urban uses has a multitude of effects. Urban growth management within the current RPS is generally justified on the basis that growth management is a necessary and efficient and effective means to manage the effects outlined above.

4.2 Managing growth to intra-urban area effects

Urban development within the existing urban footprint also has impacts. The heritage and amenity values of existing development can be compromised, new development can be of poor standard giving poor amenity and functionality for the occupants, more intensive development can lead to compounding existing infrastructure issues and pressure for more infrastructure investment.

Although the RPS attempts to be sensitive to the potential for such impacts the need to manage growth to avoid such outcomes has tended to be a peripheral justification for growth management. These matters seem to be seen as largely city/district level issues.

4.3 Managing growth to achieve urban outcomes

Whilst there is a history of managing growth through the RPS, this history has been limited to the use of growth management to *address the negative externalities* of urban development.

The future RPS might focus on pursuing urban outcomes in their own right (i.e. in economic jargon achieving *positive externalities*). As noted earlier One of the key changes for environmental management under the RMA and related statutes since the early 1990s has been a greater acceptance of the value and place of the *urban environment*. The urban environment is increasingly seen as an environment with its own value that needs to be actively managed and enhanced to achieve maximum amenity and social, cultural and economic value.

In other words, a high quality, well functioning urban environment is important to many people not simply because there may be a corresponding reduction in the impacts in non urbanised areas but because the urban areas are themselves part of the environment within which a million people work and live. Given the dominance of urban Auckland to the Auckland region, the need to enhance the quality of the urban environment might well be justified as a regional issue in its own right.

While the concept is not completely foreign to the current RPS it is currently only implied and tends to be confused with the management of negative externalities

The future RPS might usefully distinguish between growth management aimed at addressing negative externalities of urbanisation and growth management aimed to achieving certain prescribed urban outcomes.

It signals a shift from a largely reactive to a more proactive policy approach to the urban environment.

4.4 Implementation of Auckland Regional Growth Strategy

Of course urban development in Auckland is currently directed by the Auckland Regional Growth Strategy (ARGS) which is translated into the statutory context by way of the RPS.

Quite aside from the issues outlined above, there is a question of *implementation* that the RPS will need to address. Clearly a major finding of the Growing Smarter ARGS evaluation report was that the ARGS has in fact not been fully implemented to date, or at least implementation is in very early stages.

While the question of why implementation has lagged and how it might be rectified by the new RPS will no doubt exercise the minds of the ARC, it is not an issue that is addressed in this report. It is, after all, a question of *implementation* not a question of what the issues are or even what the appropriate policy response might be.

We make only two points. First, the 2005 amendment to the RMA requires district plans to “give effect to” RPSs. This clearly provides an opportunity for the RPS to

be more directive in terms of the detail with which policies are articulated in the RPS.

Second, while the RPS may be more directive of district plans, care will need to be taken that the cause of the lack of implementation is properly understood. There would appear to be reasons other than a simple reluctance to introduce optimal zoning on behalf of territorial authorities to explain why intensification has not occurred as intended by the ARGs. For example, one of the obvious development trends that has continued, notwithstanding the ARGs, is a continuing infill of low density development. This seems to have a very significant and detrimental effect on the ability to achieve the developmental outcomes sought.

Fragmented land tenure, over capitalisation (and subsequent difficulties associated aggregation), developer reluctance, infrastructure deficiencies and community resistance (and political sympathy to that resistance) and likely to be contributing factors. Only the last of these will be addressed by stronger policies in the RPS.

As already noted, this is not a matter that the paper dwells on but it seems very likely that the 2010 RPS will need to consider and promote a range of methods if it is to achieve the housing densities it wants and needs to achieve. Stronger, more directive policies in the RPS may result in more plans with ARGs-consistent zonings but it won't necessarily deliver outcomes on the ground. Prescriptive planning provisions do not overcome questions of fundamental economics and practical development constraint.

There's an old saying that if you always do what you've always done chances are you'll get what you're always got.

4.5 Appropriateness of the ARGs

The review of the RPS is also bound to raise issues about whether the growth strategy is the most appropriate for the region. Again this paper does not dwell on that matter.

The legal position seems uncertain. The LGAAA required that changes be made RPS and district plans to give effect to the growth concept of the ARGs. However, it does not, interestingly enough, require more than that. This appears to leave open the prospect that once such changes have been taken through the process, obligations under that part of the LGAAA cease. In other words, there does not appear to be any enduring obligation to maintain the RPS (or district plans) in such a way as to give effect to the Growth Concept. This may well encourage parties to argue that the RPS review is an appropriate time to alter the ARGs. While I expect the ARC to resist such an argument it would seem inevitable that the questions will be asked about the appropriateness of the current strategy. Issues that the ARC may be asked to consider are discussed below.

4.5.1 Collective versus individual sustainability

One of the big sustainability issues of the time might be best characterised as a debate between those promoting *collective sustainability* and those emphasising *individual sustainability*.

Collective sustainability is about ensuring communities as a whole can live sustainably and is broadly promoted by the current ARGs with its emphasis on urban intensification to support public transport and "efficient" land use.

Individual sustainability is about ensuring individuals have maximum opportunity to live individually sustainable lifestyles.

While the notions of individual and collective sustainability are not mutually exclusive the ability to exercise individual sustainability sometimes conflicts with the direction taken to promote collective sustainability. The most obvious examples relate to the increase in housing densities and the subsequent loss of potential for practices that in earlier times contributed to make urban areas in some ways more sustainable than they are today. These practices include growing at least some of a household's fruit and vegetables on site, disposal of stormwater on site, the maximisation of opportunities to benefit from passive solar radiation (for heating lighting and clothes drying), composting of organic matter (e.g. food scraps), provision of outdoor family play space and hence avoided need for off site activities.

In addition, modern opportunities for deploying sustainable technologies can also be constrained by some forms of intense development. The inability to install (or get best efficiency form) solar hot water heating, photovoltaic cells or to install and use rainwater collection and storage systems are examples.

Furthermore the desire to promote density has led to urban outcomes that, intuitively at least, suggest the social and health outcomes may be put at risk. High density housing on busy city intersections does, for example, raise questions about the air quality that occupants are subjected to.

These matters do not, of course, suggest that the ARGs ought not to promote intensification but they do remind us that transport is *not the only issue* that defines sustainability. The challenge for the future RPS will be how to ensure that growth management acknowledges and promotes the need to provide for individual sustainability.

4.5.2 Alternative growth outcomes

There are several alternative growth outcomes to that promoted by the ARGs. Perhaps the most obvious is a truly regional (as opposed to urban) strategy and perhaps even an inter-regional strategy that would see growth dispersed to satellite towns throughout the region and perhaps in neighbouring Northland and Waikato regions. Admittedly the ARGs does provide for some dispersed development but there is potential for far greater emphasis on dispersed (though still nodal) development linked by rail.

This will be one of the significant cross boundary issues that the RPS will need to confront.

4.5.3 Setting boundaries: tools and techniques

■ *The Metropolitan Urban Limit*

The most significant policy tool within the RPS is the MUL. However, the MUL seems to have had limited success.

Monitoring shows considerable development outside of the MUL driven by market desire that cannot be fulfilled within the MUL (and by expectations of motorway extensions – in the case of ALPURT – that would reduce travel/commuting

times). Furthermore, the MUL itself is periodically moved and is not the immutable line offering long term protection or land use certainty.

Part of the utility of the MUL as a technique is that it (in theory) rations land allowing new, greenfield urban land only other urban development opportunities have been used up.

However, as discussed elsewhere in the report, the MUL is also justified on the basis that it offers protection to significant environmental values. A line that can seemingly be jumped, and which in any event moves, does not seem to offer the protection or long term certainty required. In other words, under the current policy settings nothing has proved inviolable.

An alternative approach may be to retain the MUL solely as a land rationing tool that is moved when certain tests are met (relating to the need to provide urban land to avoid unreasonable social and economic cost). But, to complement that tool, a second line defining the long term inviolable boundaries of regionally significant values (be they harbour catchments, landscape areas, protection zones for regionally important infrastructure etc). The second line might, in places (perhaps most places), coincide with the present location of the MUL but in other areas it will indicate scope where the MUL may move in the future should circumstances dictate.

■ *Flexibility of land use and equity of opportunity outside the MUL*

While such a modification may assist in bringing greater policy certainty it would not address the underlying issue. Any attempt to zone high value uses into one area and out of another (or approve one development but not another), raises issues of equity because it creates big winners and big losers.

Restricting development outside the MUL has proved difficult for the ARC for the fundamental reason that it is difficult for decision-makers to decline applications which would leave one party disadvantaged relative to others who may simply have had the good fortune to “be in first”. It is particularly inequitable when contemporary proposals would have less impact than previously approved developments.

Landowners in rural areas are motivated to subdivide (and retain) land for a multitude of reasons often relating to personal circumstances, changing fortunes, economics of land use, or life stage. These issues have always plagued rural planning practice.

While, to some extent, these issues may be unavoidable, there may well be some means by which flexibility of land use and personal choice can be maintained without undermining long term sustainability of rural areas.

Providing for land tenure rationalisation within a largely capped number of total allotments is one option. This would provide for people to stay in rural areas should they wish while disposing of surplus land provided there is no net effect of the number of titles. It would also allow for new settlements outside of the MUL where there is compensatory land tenure rationalisation.

It is acknowledged that Change 6 takes the RPS somewhat in this direction but there would seem to be further opportunity to exploit the concept further.

4.5.4 Considering the social

One of the high profile planning issues of recent years has been the implications of planning policy on social conditions, particularly housing affordability. It seems inevitable that the ARC will need to confront the extent to which growth management policies (a) have contributed to affordability issues and (b) can better recognise housing affordability as an important regional issue.

Establishing a more direct feedback loop and action requirement (in terms of land supply) is likely to be a solution advanced by some parties.

Similarly, the issue of the social equity of planning policies may also need to be considered. Some commentators have observed how growth nodes coincide with low socio-economic communities and how some high socio-economic suburbs central suburbs have recorded stable or even declining population between the last two censuses.

Finally it is worth noting that, just as transport ought not to dominate discussions about urban sustainability, the RPS ought not to obsess solely about growth management. There are other important regional issues.

The 2010 RPS will need to address the issue of regional growth but it should also guard against simply becoming just a mega land use plan. Land use control is just one (and often a very blunt) tool available for managing the environment.

5 Other Issues

A detailed review of the objectives and policies of each chapter has not been possible within the scope of the project. However, some general observations about the contemporary relevancy of the issues are provided below.

5.1 Matters of Significance to Iwi

As noted earlier, matters of significance to iwi is now a mandatory part of an RPS. This issue will continue to be highly relevant.

5.2 Transport

Although the RMA now makes the ARC responsible for the *strategic integration of land use and infrastructure* (defined to include transport) the need for a specific transport chapter/issue seems difficult to justify. It is recognised that the transport chapter has been revised by way of Change 6 and that there may be reluctance to modify the approach but it does not seem to add greatly to the overall policy framework. A more logical approach to integrating land use and transport may be to deal with the two matters in a single growth management chapter

5.3 Energy

Energy has a higher profile now than it did in the 1990s when the RPS included the energy chapter in its RPS. In some respect the RPS energy chapter is ahead of its time. (Although it is questionable whether the laudable policies and methods have in fact been implemented).

However, several of the energy objectives are intertwined with urban form and design objectives that it seems counterproductive to deal with energy separate from these other issues.

5.4 Heritage

Clearly heritage remains an important issue for the region. However the current approach of dealing with cultural heritage and natural heritage within a single chapter does seem less appropriate now that the RMA gives considerable emphasis to the maintenance of biodiversity as an issue in its own right.

5.5 Coastal Environment

The also coastal environment remains an important dimension of resource management in the Region. The key issue for consideration is whether setting policy for the coastal *environment* (as opposed to the coastal marine areas only) assists, or detracts from, the integrated management of coastal resources. While using the coastal environment as the spatial framework for management is designed to acknowledge the important land/sea interface and interdependence it is arguable whether it has been successful in that regard. Ironically establishing land use and subdivision policies for the coastal environment creates duplication and with the provisions that apply generally. Issues of natural character landscape and biodiversity which drive concern about the coast are not limited to the coastal environment.

The current RPS coastal chapter gives scant regard to CMA occupation issues and particularly the rising issue of aquaculture.

Clearly the new NZCPS will be determinative of the approach taken in the new RPS.

5.6 Water Quality

Water quality needs to be specifically addressed by the new RPS. However, the purposes for which water is managed are clearly entangled with ecological, production, human health and aesthetic objectives. The current approach to designing water quality objectives as though they exist independent of objectives pursued elsewhere in the RPS, militates against and integrated, ecosystem management, approach.

5.7 Water Conservation and allocation

Comments made in respect of water quality apply.

5.8 Air Quality

Comments made in respect of water quality apply.

5.9 Natural Hazards

Hazards will always be an issue for regional policy. Climate change (and the statutory obligation to have regard to the effects of climate change) will heighten relevance. However hazards management is not just a resource management but need to be seen in the boarder emergency management context.

Furthermore, from an integrated resource management perspective it is questionable whether hazards warrants a separate chapter in the RPS. Hazard management is inextricably linked to urban growth management, water and coastal management and ought to be managed within those contexts.

5.10 Soil Conservation

The loss of soil is likely to be a significant issue for the region - certainly sedimentation remains one of the region's principal environmental challenges. However, the characterisation of the issue as being about "soil conservation" is arguably misleading. Sediment is both an urban and rural issue where soil conservation is a term usually associated with rural management.

In addition to sediment generation the issue that the chapter currently addresses is sustainable land management. That too continues to be a relevant issue but might more properly sit within a larger set of issues to do with sustainable primary production or risks to productive potential.

5.11 Minerals

The question of minerals is a thorny issue. Certainly in recent times Auckland has been short of local aggregate and considerable quantities have been imported from outside the region (mostly from Waikato). Clearly there are environmental implications of that. Similarly it is apparent the development in rural areas has effectively removed potential for aggregate extraction (or at least made such extraction much more expensive and problematic).

However, it is not clear that the issue really requires more than policy direction that future growth and settlement keep away from known aggregate supplies insofar as that is feasible. That would seem to be able to be appropriately accommodated within the growth and settlement policy package and need not be the subject of a separate chapter.

5.12 Pests

Pests are a significant issue for the region but they are managed under specific legislation (the Biosecurity Act) and the Regional Pest Management Strategy. A more logical approach would be to include pest management in the future RPS but only as a method of achieving biodiversity outcomes.

5.13 Waste

There has to be a large question mark about whether the RPS should address waste as a regional issue. The generation of waste is a matter of production and consumption rather than resource management. Such matters are to be addressed by separate legislation (currently the LGA and the pending Waste Minimisation Bill). The new (or rather pending) waste management regime places territorial authorities at the centre of waste minimisation. Regional councils have no specific role. Certainly management of the effects of waste disposal is a resource management issue but is not of significant consequence to warrant a separate chapter in the future RPS.

5.14 Hazardous Substances

The issue of hazardous substances has evolved considerably since the 1990s with the coming into effect of the HSNO Act in 2001 (and its subsequent amendment in 2006). The net effect of this is that hazardous substances are now managed under the HSNO Act by so-called “group standards” designed to address various risks associated with particular groups of substances. This has called into question the need to manage hazardous substances under the RMA. In recent years RMA management has been by way of the use of the hazardous facilities screening procedure (HFSP) or a locally designed equivalent. The HFSP is currently under review given questions about the need for management of hazardous substances under two separate statutory regimes.

All in all the issues around hazardous substances are detailed management matters the significance of which, even at the territorial level are in dispute. Given this context it is difficult to conclude the hazardous substances are a regionally significant issue. At most, hazardous substances are part of a wider range of environmental risks that need to be recognised.

5.15 Contaminated Sites

Contaminated sites were an issue in the 1990s and although no research has been undertaken as part of this report on the extent of recent contaminated site remediation, it seems highly likely that contaminated sites remain and continue to pose a risk. While the issue remains, the extent to which it needs to be addressed as a regionally significant issue is questionable. Contaminated sites are another environmental risk that should be recognised but it is doubtful that they deserve specific recognition in the 2010 RPS.

5.16 Esplanade reserves and strips

Esplanade reserves and strips are not regionally significant issues. They are, rather, important means by which regionally significant outcomes may be protected or enhanced. While the RPS may need to retain policies on these matters they may be better located in a chapter that addresses outcomes to which esplanade reserves and strips will contribute.

6 Possible approach for the future RPS

Taking into account all the preceding matters, an approach to the organisation and content of the 2010 Auckland RPS might be as follows

6.1 An RPS of two halves

First, in recognition of the networked (rather than linear) relationship between issues, objectives and policy responses the RPS might be organised in two parts.

- *Part One* would set out the issues and the outcomes (objectives) sought in respect of those issues.
- *Part Two* of the future RPS would set out the policies and methods to achieve one or more of the outcomes.

Cross referencing would ensure that the relationships between the two parts were transparent. As discussed in the following sections, each group of policies (as proposed) addresses most (if not all) issues and outcomes. This demonstrates how policies across the full suite of ARC functions are marshalled towards responding to regional issues.

6.2 Issues and outcomes

The approach proposed would allow the issues and outcomes to be kept at a reasonable high level and be reasonably discrete. Our review of the issues suggests that a starting position might be chapter headings based on *seven key regional issues* being:

- Climate change and energy
- Urban environment (form and design)
- Natural and rural character, landscapes and seascapes
- Biodiversity
- Sedimentation
- Cultural heritage
- Sustainable communities

An outcome relating to *Maori values and interests* should arguably be added to this list but for the purpose of this paper is not dealt with here⁴.

A further issue relating to productive potential of land, sea and freshwater (other than natural ecosystem productivity) warrants further consideration.

■ *Climate change and energy*

The role of regional councils (and local government generally) in climate change has been a source of debate and confusion for some years. While a number of local authorities have suggested that they have a leading role to play, that

⁴ The alternative would be to weave Maori interests into each issue-based chapter

increasingly seems a well-intended, though largely misplaced characterisation of their real role.

It is becoming very much clearer that as the country, and the globe, moves toward an international price on carbon and as this price feeds through the economy to increase the price of energy (in particular) local authorities' role is to assist communities and individuals transition to a high energy cost world. In other words, market mechanisms such as emissions trading can use prices to incentivise behavioural change but unless communities have the means of changing that behaviour (including, for example, alternatives to personal motorised transport) the transition will be slow and painful.

The end of “cheap” oil and the likely long term upward trend in oil prices reinforces the validity of the issue.

The outcomes sought in response to the climate change and energy issue ought to centre on:

(a) Achieving an urban form where:

- there are viable alternatives to personal mobility based on the car
- there is reduced need for trips and/or reduced length of trips
- the provision/enhancement and use of public transport is viable

Again, for credibility in the climate change and energy policy context, it will be important to position such objectives as being not about driving change but facilitating change in a world of high energy prices

(b) Increasing the opportunities for the harnessing and use of renewable energy.

Although there are unlikely to be large renewable energy projects in the Auckland region between now and 2025, the prospect cannot be ruled out⁵. If they are large scale renewable projects they will most likely be wind projects on the west coast and or wave/tidal projects associated with the Kaipara or Manukau harbours. Some broad level policy support for such projects may be appropriate. (And will be essential if the draft NPS on renewable energy is promulgated as expected).

More significant for Auckland, however, may be renewable energy at the individual and small-scale community level. This issue should recognise the value of passive solar radiation, solar hot water, PV energy, micro hydro, micro wind and similar technologies that might well become more popular as energy prices rise.

The issue will also need to recognise the matters raised by the NPS on electricity transmission.

The climate change and energy issue will have implications for, in particular, the management of urban design, water and natural and rural character and landscapes.

⁵ The Electricity Commission has recently modelled a likely scenario that would see NZ reach the NZ Energy Strategy target of 90% renewable electricity generation by 2025. There are over 50 new generation projects within that scenario. None are located in the Auckland region.

■ *The urban environment*

As noted earlier, the urban environment is a huge part of the Auckland region and (presumably) an issue of importance of a great many Aucklanders. There are two dimensions to this issue that will need to be recognised:

- The first is the need to better manage the negative externalities of urban development which contribute to an often poor urban environment.
- The second element is about been more proactive in the achievement of a better urban environment

Both dimensions ought to focus on securing better urban design (which is about both aesthetics and functionality). However a sub theme may be about protecting urban quality from major infrastructure (such as the airports) and protecting major infrastructure from the reverse sensitivity effects of urban encroachment. In that way the urban environment issue may assist in setting some of the inviolable boundaries that would support growth management.

■ *Natural and rural character, landscapes and seascapes*

Natural character and landscape will always be a significant issue simple because it is the visible element of environmental change.

This has two dimensions. The first relates to aesthetics, the second to the functioning of natural systems (including hydrological, marine, and biotic systems and processes).

This section will need to address both land and coastal environments. As with the urban environment, the spatial delineation of particularly iconic and highly valued areas and systems may well form the “hard” boundaries that assist with long term growth management.

■ *Sedimentation*

Sedimentation affects both natural character and biodiversity and in that sense its identification as a separate issue might be questioned. However it is such a significant and pervasive issue in the region that its separate identification is considered appropriate.

The issue will of course be relevant to both urban and rural management since both contribute to sediment generation. But significantly it may allow outcomes to be expressed in the RPS relating the protection of particular catchments/coastal environments from the potential for sedimentation (such as the Okura or Mahurangi harbours).

As with the previous two issues, this approach may assist establishing some inviolable boundaries.

■ *Biodiversity loss*

Biodiversity is an essential issue for the RPS to address from both a statutory and regional perspective).

It should recognise risks to aquatic, marine, terrestrial biodiversity. Objectives for biodiversity will need further thought. Clearly there will be the usual emphasis on protection of “significant natural areas” but there will also need to be attention on,

for example, waterways being able to provide suitable habitat for the life cycles of diadromous fish.

This issue will need to set out the many sources of threat to biodiversity, including urbanisation (and the introduction domestic pets), “wild” animal and plant pests, habitat loss, water quality degradation, sediment contamination etc.

Although there have been some successes in recent years in terms of reintroductions of birds these gains have been confined to intensively managed public lands. The RPS should seek more pervasive change across landscape.

■ *Cultural heritage loss*

Like biodiversity, loss of cultural heritage is an essential issue from both a statutory and regional perspective. Again, like biodiversity this section will need to discuss the many reasons for heritage loss. It will be important to set clear and realistic objectives for heritage protection given the tendency to date for incremental loss.

This section offers the opportunity to discuss cultural heritage in its broadest sense. In the Auckland region, the characterisation of heritage loss might well encompass change in land use and the nature and intensity of that use. Change in coastal settlements and rural land use might provide useful context for policy responses (Although the setting of objective may prove challenging).

■ *Community sustainability, health and safety*

Although the RMA is not about the overt pursuit of social outcomes, social expectations underpin many environmental objectives. Recognising community sustainability as an issue, for example, justifies regional policy responses relating to public access to the coast and rivers, the maintenance of water quality at levels suitable for contact recreation, managing water allocation in ways that ensure people can meet reasonable needs, managing air quality at standards that do not compromise human health, urban design to minimise risk from crime and similar matters.

Perhaps even more significantly, an explicit concern for social sustainability does demonstrate that the RPS will be concerned about the effect of its policies on housing affordability and that growth management policies will be designed and implemented with that in mind.

It may be considered inappropriate to overtly pursue social outcomes through the RMA but it will not be inappropriate to consider social issues when managing resources. While the distinction may be subtle it would seem entirely consistent with section 5 of the RMA. The key will be to ensure that it is clear that that are some (perhaps many) aspects of social sustainability that cannot be advanced through the RPS. In that sense, it is a touchstone rather than an endpoint for the RPS.

6.3 Policies and methods

Policies and methods to respond to these issues and outcomes might also be clustered around six themes being:

■ *Urban growth management*

This section would incorporate key elements of the current Chapter 2 of the current RPS.

As noted earlier, consideration ought to be given to the inclusion of a new, complementary tool to the MUL. This would take the shape of a second line (not necessarily continuous) that defines inviolable limits based on key environmental values.

In terms of development with the existing urban footprint, the RPS will need to consider what new tools may be required to achieve desired densities. Clearly there is a relationship here to Auckland governance issues currently being considered. However, a public (or public/private partnership) vehicle for urban development/redevelopment does seem a potential mechanism.

The urban growth management chapter will cross reference to many of the outcomes of Part 1 of the RPS including, most notably, climate change and energy, the urban environment, natural character and landscape, sedimentation, heritage and social sustainability.

■ *Rural development and production management*

This section would address land use outside of the MUL and existing settlements. The control of both development and production are deliberately combined in this section to reflect the interconnections and to move away from the connotation that rural activities are necessarily good and urban activities are necessarily bad.

The chapter would address how rural settlement and production (land subdivision and primary production practices) ought to be managed to achieve the climate change and energy, biodiversity, sedimentation, sustainable communities and natural and rural character and landscape outcomes.

This should take account of negative externalities of land use as well and the potential to use land use change to secure positive externalities. Regard might be had to the questions raised in Appendix 2 of this report.

■ *Water management*

Clearly the RPS will need address water management including rivers, lakes, discharges, allocation and catchment management (urban and rural). Obviously the framework will need to be consistent with the ALW plan and link to climate change and energy, urban environment, natural and rural character, sedimentation and community sustainability outcomes.

■ *Air management*

The RPS will also need to address air quality. Again it will need to be consistent with the ALW plan and address, in particular community sustainability outcomes.

■ *Coastal management*

The RPS will also need to address coastal management (seaward of MHWS). Much of that will be driven by the need to provide a framework consistent with the NZCPS. This suggested approach would see the coastal management section restricted to the CMA which is a departure from the existing approach of

considering the coastal environment. While there are pros and cons of each approach, the current overlap between coastal policies and rural policies is unhelpful.

■ *Risk management*

The risk management chapter would address five environmental risks that may not in themselves warrant separate chapters. The organising theme of this chapter is that there may not be any current adverse effect but there is a risk that needs to be managed because of the potential effects on one or more of the regionally significant outcomes. Those risks relate to:

- Natural hazards. Clearly the risk from natural hazards relates to community sustainability (potential loss of lives and property).
- Hazardous substances. The risk from hazardous substances relates also to community sustainability (in the threat to health and safety) and also to biodiversity (from inadvertent discharges to waterways).
- Contaminated sites. As above.
- Biosecurity/plant and animal pests. Clearly this links directly to the biodiversity issue (and to some extent the natural character issue). Probably only an acknowledgement of the issue is required with reference to the regional pest management strategy as the principal method of addressing this risk). However, it may be appropriate to provide policy on the keeping and farming of certain species and associated land use matters.
- Genetically modified organisms (possibly). It is doubtful that the RPS could provide policy on GMOs as the law currently stands. However, the Ministry for the Environment is currently considering law changes to allow for greater control of GMOs through the RMA.

Appendix 1 – Integrated Management

One of the key issues when deciding on structure and style will be which approach best achieves *integrated management* – the purpose of the RPS.

There are many definitions of integrated management. The commonality among the various definitions stems from the desire to ensure that decisions taken at different times, by different people or in different places (whether regulatory or operational) do not undermine or subvert the reasonable decisions (and outcomes) of others. Indeed, and to the extent that common goals are possible, there is a clear preference that decisions taken should be mutually supportive.

In the resource management context it is generally held that integration relates to consistency of management across environmental media (e.g. air, land and water) to recognise the natural inter-relationships of environmental systems. In other words, integrated environmental management means making decisions on one resource taking account of the effects on other resources (“*systems recognising*” integration).

Because the management of these media/resources is split between jurisdictions (central, regional and local government) integration also relates to the co-ordination of different agencies’ responses to environmental issues (*inter-jurisdictional integration*). It is also possible for different parts of the same organisation to exercise different functions in ways that affect a single outcome. Therefore integration also refers to *intra-jurisdictional integration*.

Where multiple decision-makers have jurisdiction over matters that are inherently inter-connected, all decision-makers need to be aware of others’ goals (and/or be guided by a *common* goal) and all take, and be seen to take, those goals into account when making decisions. Furthermore, integrated management of natural systems necessitates good information and understanding of the implications of decisions.

In resource management terms, the purpose of integration is, as outlined above, to ensure effective, co-ordinated achievement of outcomes. But it is also about administrative cohesion. The objectives of integration also focus on administrative and economic goals such as process efficiency, and the minimisation of compliance costs. Achieving integrated management also means ensuring that resource users do not face (for example) duplicative processes or multiple consent requirements where this is not necessary.

Integration is usually achieved by *instrumental* means – such as a policy that guides an organisation’s (or multiple organisations’) responses or by *process* means – such as decision-making arrangements that involve all parties who have an interest (or potential affect on) an outcome.

RPSs represent an instrumental approach to achieving integration. There is inherent integrating utility in RPS policies because the Act states that district and regional plans must “give effect” to them. Therefore *inter-jurisdictional* integration is automatically achieved simply by having an RPS policy that a district plan can give effect to. That is, there is a “locked in” mechanism to ensure regional/territorial policy alignment. Furthermore, RPSs are *council* policies and (for the avoidance of doubt) the RMA states that regional plans must also “give effect” to those RPSs. Therefore RPSs also have utility in promoting intra-jurisdictional integration.

However, to fully achieve *systems recognising integration* an RPS’s policies and methods must themselves display and promote management that demonstrates *how* functions under the RMA will be exercised in mutually supportive ways. The development of cross-functional strategies is one way to do this. Identifying areas or resources for either protection or development (having taken into account the full range of values) is another possible approach⁶.

The RPS must also address jurisdictional integration not guaranteed by the “nesting”⁷ provisions of the Act. This includes, in particular, cross boundary issues between regional councils and cross boundary issues between parties exercising functions under other statutes.

The RPS policies and methods can also promote integration through *process* means. For example, the RPS could establish a framework for greater *co-management* of particular resources or promote the use of joint hearings in certain circumstances. Other (existing) mechanisms include the Auckland Regional Growth Forum and the Hauraki Gulf Forum.

⁶ The Auckland Region’s metropolitan limits are an example of this form of integration – a variety of issues and values were considered together to develop a spatially bound policy response.

⁷ The nesting provisions are those provisions that require regional and district plans to give effect to the RPS.

Appendix 2 – Rural policy issues: some preliminary questions

Rural policy has been something of the poor relation in the current RPS. There is little attention given to securing particular rural outcomes. There is an implicit assumption, it seems, that curtailing urban (and most notably residential development) in rural areas will maintain productive potential of rural land and maintain environmental quality. The approach rather assumes that urban uses are necessarily “bad” while rural uses are necessarily “good”.

While the desire to ensure the control of rural sprawl is acknowledged, the policy position does not reflect the reality that rural uses can themselves be environmentally damaging including having significant impact on productive potential (through, for example, poor soil management practices, and injudicious use of fertiliser and agricultural chemicals).

Moreover the current policy position does not seemingly acknowledge the huge potential for growth in rural areas that already exists⁸. It would seem unlikely (given existing objectives) that the potential development of rural areas would be a desirable outcome. Yet there is little attention given to avoid such an outcome.

On the other hand, the viability of agriculture in the Auckland region, given land prices and relatively small average land holdings, must be highly questionable⁹. It seems likely that much pastoral agriculture within the region is small-scale, not economic in a commercial sense, and probably heavily cross subsidised by off-farm income. This leaves open the question of what the ARC position should be with regards to rural land. Some questions that arise are:

- Should it seek to protect an uneconomic activity?
- If so what mechanisms are available? How viable is it to decouple the traditional right to a dwelling from title to land?
- Should it not worry about agriculture but focus only on rural character/amenity issues?
- What are the implications of a high cost energy future for rural production and rural settlement? There would seem to be arguments for both less demand for rural living (at least by commuters) and for more demand for settlement (given that cheap energy was the primary driver of rural depopulation in the first place).
- Given the potential for rural settlement should there be a more lenient policy position towards activities that service or give employment to the rural population to avoid transport implications
- Should it seek to better control, or wind back, the potential settlement of rural land?

⁸ Supposedly 11,300 existing rural titles (<8ha) not built on and a total of 28,000 titles and dwellings (including rural settlements) or enough capacity for 44 years at current uptake rates.

⁹ Certainly the number of dairy farms (the most profitable form of farming over recent years) has been in steady decline in the region with the number of herds dropping from 807 in 1998/99 to 500 in 2006/07 (with a corresponding 25% drop in the number of cows).

- What mechanisms might there be to share the burden and the responsibilities of rural management to avoid creating big winners and big losers?
- How might policy provide flexibility for land use change and innovation in rural areas without allowing gradual degradation of long term land use options? Should there be allowance for rural subdivision provided there is no net effect on the number of titles in a management area?
- How might other environmental outcomes be achieved (like biodiversity and water quality protection) through rural land management? Development rights and obligations seem presently the only realistic way to achieve major change across rural landscape in terms of better stewardship of non productive resources. Can we harness the demand for rural living to achieve pervasive change in what is, from a purely environmental perspective a ravaged landscape?

In short, rural policy seems underdeveloped (certainly when compared to the attention given to urban policy).