

Mā tō tātou takiwā
For our District

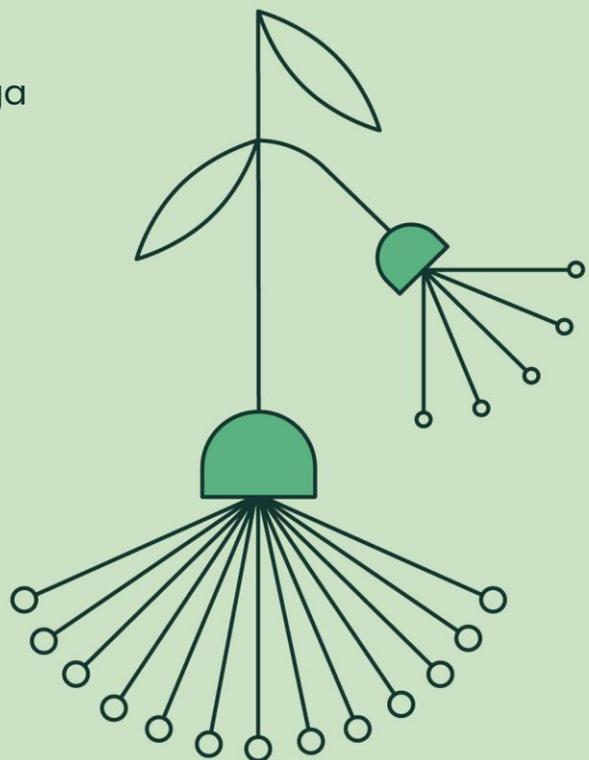
Policy Committee

Komiti Kaupapa Here

PP22-6

Tuesday, 26 July 2022, 9.30am

Council Chambers, Barkes Corner, Tauranga



Policy Committee

Membership:

Chairperson	Mayor Garry Webber
Deputy Chairperson	Cr Monique Gray
Members	Cr Grant Dally Cr Mark Dean Cr James Denyer Cr Murray Grainger Cr Anne Henry Cr Kevin Marsh Cr Margaret Murray-Benge Deputy Mayor John Scrimgeour Cr Allan Sole Cr Don Thwaites
Quorum	6
Frequency	Six weekly

Role:

- To develop and review strategies, policies, plans and bylaws to advance the strategic direction of Council and its communities.
- To ensure an integrated approach to land development (including land for housing), land use and transportation to enable, support and shape sustainable, vibrant and safe communities.
- To ensure there is sufficient and appropriate housing supply and choice in existing and new urban areas to meet current and future needs.

Scope:

- Development and review of bylaws in accordance with legislation including determination of the nature and extent of community engagement approaches to be employed.
- Development, review and approval of strategies and plans in accordance with legislation including determination of the nature and extent of community engagement approaches to be employed.
- Subject to compliance with legislation and the Long Term Plan, to resolve all matters of strategic policy outside of the Long Term Plan process which does not require, under the Local Government Act 2002, a resolution of Council.
- Development of District Plan changes up to the point of public notification under the Resource Management Act 1991.
- Development of the Future Development Strategy and urban settlement plan.
- Consider and approve changes to service delivery arrangements arising from service delivery reviews required under the Local Government Act 2002 (provided that where a service delivery proposal requires an amendment to the Long Term Plan, it shall thereafter be progressed by the Annual Plan and Long Term Plan Committee).

- To report to Council on financial implications of policies and recommend any changes or variations to allocated budgets.
- Listen to and receive the presentation of views by people and engage in spoken interaction with people pursuant to section 83(1)(d) of the Local Government Act 2002 in relation to any processes Council undertakes to consult on under the special consultative procedure as required by the Local Government Act 2002 or any other Act.
- Oversee the development of strategies relating to sub-regional parks and sub-regional community facilities for the enhancement of the social and cultural wellbeing of the Western Bay of Plenty District communities, for recommendation to Tauranga City Council and Western Bay of Plenty District Council.
- Develop the draft Statement of Intent for any Council Council-Controlled organisation (CCO) and review, assess and make recommendations to Council on any modifications to CCO or other entities' accountability documents (i.e. Letter of Expectation, Statement of Intent) or governance arrangements.
- Approve Council submissions to central government, councils and other organisations, including submissions on proposed plan changes or policy statements.
- Receive and make decisions and recommendations to Council and its Committees, as appropriate, on reports, recommendations and minutes of the following:
 - SmartGrowth Leadership Group
 - Regional Land Transport Committee
 - Any other Joint Committee, Forum or Working Group, as directed by Council.
- Receive and make decisions on, as appropriate, any matters of a policy or planning nature from the following:
 - Waihi Beach, Katikati, Ōmokoroa, Te Puke and Maketu Community Boards,
 - Maketu-Te Puke Ward Forum
 - Kaimai Community Ward Forum
 - Katikati- Waihi Beach Ward Forum

Power to Act:

- To make all decisions necessary to fulfil the role and scope of the Committee subject to the limitations imposed.

Power to Recommend:

- To Council and/or any Committee as it deems appropriate.

Power to sub-delegate:

- The Committee may delegate any of its functions, duties or powers to a subcommittee, working group or other subordinate decision-making body subject to the restrictions within its delegations and provided that any such sub-delegation includes a statement of purpose and specification of task.

Notice is hereby given that a Policy Committee Meeting will be held
in the Council Chambers, Barkes Corner, Tauranga on:
Tuesday, 26 July 2022 at 9.30am

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1 PRESENT**2 IN ATTENDANCE****3 APOLOGIES****4 CONSIDERATION OF LATE ITEMS****5 DECLARATIONS OF INTEREST**

Members are reminded of the need to be vigilant and to stand aside from decision making when a conflict arises between their role as an elected representative and any private or other external interest that they may have.

6 PUBLIC EXCLUDED ITEMS**7 PUBLIC FORUM**

A period of up to 30 minutes is set aside for a public forum. Members of the public may attend to address the Board for up to five minutes on items that fall within the delegations of the Board provided the matters are not subject to legal proceedings, or to a process providing for the hearing of submissions. Speakers may be questioned through the Chairperson by members, but questions must be confined to obtaining information or clarification on matters raised by the speaker. The Chairperson has discretion in regard to time extensions.

Such presentations do not form part of the formal business of the meeting, a brief record will be kept of matters raised during any public forum section of the meeting with matters for action to be referred through the customer contact centre request system, while those requiring further investigation will be referred to the Chief Executive.

8 PRESENTATIONS

9 REPORTS

9.1 COUNCIL SUBMISSION ON EXPOSURE DRAFT NATIONAL POLICY STATEMENT FRESHWATER MANAGEMENT (NPS-FM) AND NATIONAL ENVIRONMENTAL STANDARDS FRESHWATER (NES-F)

File Number: A4635013

Author: Tracey Miller, Senior Policy Analyst Resource Management

Authoriser: Rachael Davie, General Manager Strategy and Community

EXECUTIVE SUMMARY

1. This report provides a submission made by Mayor Webber on behalf of the Western Bay of Plenty District Council on the following matter, for the information of Policy Committee.
 - (a) Western Bay of Plenty District Council's submission on the Exposure Drafts for the National Policy Statement Freshwater Management (NPS-FM) and the National Environmental Standards for Freshwater (NES-F).
2. Since the NPS-FM and NES-F was gazetted in August 2020, the Ministry for the Environment (MfE) has consulted on proposed amendments to the wetland provisions in October 2021. Most recently MfE have sought feedback on two Exposure Drafts of the legislation (NPS-FM and NES-F). The attached submission (attachment 1) provides feedback on these latest Exposure Drafts.
3. The key changes in the Exposure Drafts relate to what is being proposed to be excluded in the definition of wetlands and new proposed consenting pathways for development within wetlands. In addition, there are also several technical correction and clarifications in the legislation.
4. A key matter in the Exposure Draft of the NPS-FM is the proposal to introduce a special exemption for development (in wetlands) within Tauranga urban growth areas as identified in the SmartGrowth Urban Form and Transport Initiative Connected Centres Programme.

RECOMMENDATION

1. That the Senior Policy Analyst's report dated 26 July 2022, titled 'Council Submission on Exposure Draft National Policy Statement Freshwater Management (NPS-FM) and National Environmental Standards Freshwater (NES-F)', be received.
2. That the attached submission (attachment 1 of the agenda report) be received by the Policy Committee and that the information is noted.

ATTACHMENTS

- 1. Final WBOPDC Submission on Exposure Draft of Amendments to NPS-FM and NES-F**  

Exposure draft of amendments to [National Policy Statement for Freshwater Management 2020 and the National Environmental Standards for Freshwater 2020](#)

This submission is in relation to the proposed changes to the National Policy Statement for Freshwater Management 2020 (NPS-FM) and the National Environment Standards for Freshwater 2020 (NES-F).

This submission is in relation to urban development. Feedback has not been provided on areas unrelated to urban development.

Policy 6 and 7

The existing policies 6 and 7 refer to no further loss of natural inland wetlands and avoiding the loss of river beds. Council recommends using the terms 'no net loss' as opposed to 'no further loss or avoiding' to provide for the possibility of losing and re-creating habitat which may improve freshwater values in some scenarios.

The clarification of the definition of wetland

3.21 Definitions relating to wetlands

Council supports the amendment to the natural wetland definition. In particular the exclusion of 'deliberately constructed wetlands' and induced wetlands.

3.22 Natural inland wetlands

Western Bay of Plenty District Council supports the overall intent that the loss of natural inland wetlands be avoided, their values protected, and their restoration promoted. The exposure draft has introduced a new consenting pathway (Clause 3.22(1)(c) for urban development within wetlands if the regional council is satisfied:

- that the activity is necessary for the purpose of urban development that contributes to a well-functioning urban environment (as defined in the NPS-UD); and
- that the activity occurs on land identified for urban development in an operative regional or district plan; and
- the activity does not occur on land that is zoned in a district plan as general rural, rural production or rural lifestyle; and
- there is either no practicable alternative location of the activity, or every other practicable location would have equal or greater adverse effects on a natural inland wetland; and
- the effects of the activity are managed through applying the effects management hierarchy and, if aquatic offsetting or aquatic compensation is applied, the offsetting or compensation will be maintained and managed over time; or

Proposed wording change

Clause 3.22(1)

"Every regional council must include the following policy (or words to the same effect) in its regional plan: the loss of extent of natural inland wetland is avoided, their values are protected, and their restoration is promoted, except where.."

Council recommends the inclusion of the words 'no net loss' of wetlands rather than the 'loss of extent' to provide for the possibility of losing and re-creating wetland habitat which may improve values in some scenarios.

Removal of functional need test and introduction of best practical location (BPL)

Reaching a reasonable conclusion that there is no practicable alternative location of the activity (proposed urban development) or that every practical location would have equal or greater adverse effects is a qualitative assessment that the Regional Council would need to agree with. Council supports the removal of the 'functional need' tests for urban development given the difficulty of meeting the requirement. The new requirement, best practicable location (BPL), enables a more practical consideration. To prove that there is either no practicable alternative location for the activity, or every other practicable location would have equal or greater adverse effects on a natural wetland. Best practical location alternatives are however reasonably subjective, and will require a transparent process between the local and regional council.

Clarification is sought on location alternatives for the BPL test, in particular the possible extent of area where other location alternatives should be considered from. For example, would it be reasonable to provide an analysis for urban development within Omokoroa only or would a wider geographical assessment be required i.e., Katikati.

Specified infrastructure

Council has an interest in specified infrastructure (as identified in the Regional Policy Statement) in relation to any infrastructure that delivers a service operated by a lifeline utility, regionally significant infrastructure, public flood control, flood protection or drainage works. **Council supports the inclusion of water storage infrastructure being included in the definition of specified infrastructure.**

Under 3.22(1)(b) regional council can utilise an exception for development within wetlands for specified infrastructure provided that the specified infrastructure will provide significant national or regional benefits and there is a functional need for the specified infrastructure in that location and the effects of the activity are managed through applying the effects management hierarchy. We request the removal of the functional need test because of the difficulty in meeting the

requirements while trying to achieve the urban development outcome. Propose that the BPL test is used instead as outlined above (for urban development).

The requirement for specified infrastructure to provide significant national or regional benefits (3.22(1)(b)(ii)) is difficult to meet in some circumstances. For example, flood control, drainage works or water storage (as proposed to be introduced). Council proposes the introduction of a test of special circumstances to be able to recognise for the need for specified infrastructure in a location where the requirement for that infrastructure is locally significant but not regionally significant.

Overall Council supports the introduction of a consenting pathway for urban development as outlined in Clause 3.22(1)(c).

3.24 River Beds

Council recommends the inclusion of the words 'no net loss' of river beds rather than '*The loss of river bed extent and values is avoided*' to provide for the possibility of losing and re-creating river bed habitat which may improve values in some scenarios.

Clarification is sought on whether the proposed 3.34 (urban development) overrides the functional need test for River Beds (in 3.24) provided the effects management hierarchy can be met for any stream loss.

If this is not the case, we request the removal of the functional need test for river beds because of the unlikelihood of being able to develop within a river bed. Noting a river bed could include a modified water course for example a waterway that resembles a farm drain or a very low quality environment.

3.34 Urban development in Tauranga

A new clause 3.34 has been added to the NPS-FM in relation to urban development in Tauranga.

- 1) *When inserting the policy described in clause 3.22(1) into its regional plan, the Bay of Plenty Regional Council may include the following additional exception:*
 - a) *"the regional council is satisfied that:*
 - (i) *the activity is necessary for the purpose of urban development specifically identified in the SmartGrowth Urban Form and Transport Initiative Connected Centres Programme; and*
 - (ii) *the effects of the activity are managed through applying the effects management hierarchy."*

(2) The policy described in subclause (1) must no longer be applied on the date that is 5 years after the date on which the National Policy Statement for Freshwater Management 2020 Amendment No. 1 comes into effect.

Clarification on growth areas

Clarification is sought on the interpretation of the new clause (3.34) in relation to any growth area within Tauranga as prescribed by the Urban Form and Transport Initiative (UFTI). UFTI covers all the urban areas associated with the Tier 1 councils of Tauranga City Council and Western Bay of Plenty District Council. For consistency it is recommended that all the urban development areas associated with UFTI be defined within the NPS-FM. This would include the growth areas of Ōmokoroa and Te Puke that are defined as such through the RMA Enabling Housing Amendment.

Development within Western Bay of Plenty

Ōmokoroa has long been recognised for urban development and growth and the existing Western Bay of Plenty District Plan and Bay of Plenty Regional Policy Statement reflects this. The Resource Management team are currently preparing a change to the District Plan as required by the RMA-EHA and MDRS to enable intensification in both Ōmokoroa and Te Puke.

Clarification on the word 'may' and planning processes

"When inserting the policy described in clause 3.22(1) into its regional plan, the Bay of Plenty Regional Council may include the following additional exception:

There is a lack of certainty with the use of the word 'may'. It is unclear what process would be followed to make the decision on whether or not to include the exception. Council recommends that the word 'may' is replaced with 'must' or alternatively set out the circumstances for how a decision would be made.

Clarification is sought on what occurs if the Regional Council is not satisfied on the points described in 3.34 e.g., that the activity is not necessary for the purpose of urban development and what (if any) ability the territorial council will have to attempt to reach satisfactory agreement other than negotiation between the two parties.

A 5-year timeframe to implement the proposed policy in 3.34 may be difficult to achieve and clarification is sought on why this timeframe has been applied. A ten-year time frame is more realistic.

National Environmental standards for freshwater 2020

Urban development**45C Restricted discretionary activities**

This new section of the Act is in relation to vegetation clearance, earthworks, taking, use, damming or diversion of water, discharge of water all in relation to wetlands.

Council supports the consenting pathway for urban development as a restricted discretionary activity in 45C. **Council recommends the inclusion of stormwater management from urban development as a restricted discretionary activity under 45C.**

Clarification is sought on whether or not urban development related activities within the 100m wetland setback is also a restricted discretionary activity (as it is otherwise not listed).

There is no new classification proposed in the Standards or activity status for urban development in relation to the possible impacts on river beds. Clarification is sought if this makes the activities like those set out in 45C but in relation to river beds a prohibited activity as it is not listed in the Standards.

9.2 SUBMISSION ON BEHALF OF COUNCIL**File Number:** A4639583**Author:** Tom Rutherford, Policy Analyst**Authoriser:** Rachael Davie, General Manager Strategy and Community**EXECUTIVE SUMMARY**

1. This report provides a submission made by Mayor Webber on behalf of the Western Bay of Plenty District Council on the following matter, for the information of the Policy Committee:
 - (a) Submission to the Tauranga City Council – Draft Waste Management and Minimisation Plan, dated 7 July 2022.

RECOMMENDATION

1. That the Policy Analyst's report dated 26 July 2022, titled 'Submission on Behalf of Council,' be received.
2. That the following submission, shown as Attachment 1 of the agenda report, is received by the Policy Committee and the information is noted:
 - Western Bay of Plenty District Council submission to the Tauranga City Council – Draft Waste Management and Minimisation Plan, dated 7 July 2022.

ATTACHMENTS

1. **Draft Waste Management and Minimisation Plan – Submission to TCC**  



Western Bay of Plenty District Council
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7 July 2022

Draft Waste Management and Minimisation Plan 2022–2028
Tauranga City Council
Private Bag 12002
Tauranga 3143

Name: Mayor Garry Webber
Organisation: Western Bay of Plenty District Council
Postal Address: Private Bag 12803, TAURANGA 3143
Daytime telephone: 0800 926 732
Contact email address: tom.rutherford@westernbay.govt.nz

Dear Commission Chair Anne Tolley,

Submission on the Tauranga City Council Draft Waste Management and Minimisation Plan 2022–2028.

Thank you for the opportunity to submit on the Tauranga City Council Draft Waste Management and Minimisation Plan 2022–2028.

The Western Bay of Plenty District Council values the ongoing collaboration and cooperation between our councils. This has delivered benefits for both our communities, for example through the aligned procurement processes for our respective kerbside collection services, and our input into joint submissions through the Central North Island Waste Liaison Group to Central Government.

The management and minimisation of waste, by its nature, must be collaborative. All sectors of our city, district and communities produce waste in some form; it moves through a number of different hands and bodies and is either eventually reused or unfortunately buried as landfill. This waste system is highly interconnected between the Bay of Plenty and Waikato Regions. The principal landfills are at Tirohia and Hampton Downs, in the Waikato, and much of the wider Bay of Plenty's waste travels there via Te Maunga transfer station.

The interconnected nature of waste and need to collaborate should be better reflected in the Tauranga City Council's Waste Management and Minimisation Plan. Explicit reference should be made to working alongside and with partner councils on cross-regional, regional, and sub-regional projects. Councils cannot effectively address this issue in isolation or lead this work alone.

We look forward to continuing to work together over the coming years for the betterment of our communities and environment. Western Bay of Plenty District Council recently adopted its Waste Assessment and will be working through the review of our Waste Management and Minimisation Plan over the coming 12-18 months. This provides a strong opportunity for collaboration on regional and sub-regional actions, and to align waste planning actions where appropriate.

The below schedule provides more specific feedback on elements of the Draft Waste Management and Minimisation Plan.

Yours sincerely,

A handwritten signature in black ink that reads "Garry Webber". The signature is written in a cursive style with a large, looping initial 'G'.

Garry Webber

Mayor

Western Bay of Plenty District Council

Page	Topic	Comment and Change Sought
4	Vision	<p>We support the proposed vision of the Draft Waste Management and Minimisation Plan (WMMP) being to “reduce waste to landfill”.</p> <p>We note that this is similar to the vision in Western Bay of Plenty District Council’s (WBOPDC) current WMMP – “Minimising Waste to Landfill”. It is good to see common thinking across both our councils with regards to our vision statements.</p> <p>We agree with the sentiment set out that a ‘zero waste’ vision would be unachievable and unattainable over the next six years of this proposed Plan. We commend the more practical and targeted approach taken with longer term work towards having a circular economy and reaching the ultimate goal of having zero waste.</p>
9+	Proposed Targets associated with the kerbside collection services	<p>We agree that the introduction of Council-led household kerbside recycling, food waste and garden waste services have helped to reduce the amount of recyclable and recoverable waste going to landfill. However, as recognised in the draft WMMP, there remains a high proportion of household waste that could be diverted from landfill.</p> <p>We support the targets identified.</p> <p>We note that tourists/visitors are identified as a potential source of contamination here. We suggest consideration of adding an additional action to specifically target education of this group. We also note that the future standardisation of services work led by the Ministry for the Environment may also assist on reducing possible confusion for visitors.</p>
12	Construction and Demolition Waste diversion targets	<p>We are pleased to see the focus on the construction and demolition waste and note the significant opportunity to divert these materials away from landfills.</p>
34	Council and Industry Collaboration	<p>We are pleased to see sub-regional, regional, cross-regional, and national collaboration to manage and minimise waste recognised in the WMMP.</p> <p>We would suggest that recognition of the Central North Island Waste Liaison Group be included in this section too.</p>

		<p>Collaboration brings with it a huge amount of benefit and potential and is a strength that we look forward to maintaining. We note that this is something the Medical Officer of Health also sought to emphasise in their comments.</p>
40	<p>Action 1 Waste Strategy and city and regional infrastructure plan</p>	<p>We recognise and support continued collaboration in waste planning and a strategic approach being taken.</p> <p>We feel that this action should better be framed in this light, and an emphasis on collaboration more explicitly stated.</p> <p>Other wording changes should be considered here. We are concerned that as currently drafted a 'Tauranga Waste Strategy' would attempt to set a path for the wider region, without involvement or collaboration with partners. We are also concerned that the 'city and regional infrastructure plan' mentioned in this action is focused on providing for the 'growth of our city'. This is the wrong focus for a waste project and a multi-regional collaborative project - the plan should focus on improving waste outcomes and regional efficiencies and improvements for all our communities, addressing growth is one part of this.</p>
40	<p>Action 2 Underused Assets Register</p>	<p>We support the investigation, trial and establishment of an underused assets register which will identify assets that are underused, stranded, or abandoned.</p> <p>We note that lessons may be learnt from similar initiatives in Auckland, such as CivilShare.</p>
41	<p>Action 7 Sustainable Procurement Action Plan and Strategy</p>	<p>We are supportive of the development of sustainable procurement action plan and strategy with a focus on a circular economy to eliminate and reduce waste.</p> <p>Procurement is a powerful tool to deliver a circular economy.</p>
42	<p>Action 15 Innovative Smart Technology Solutions</p>	<p>We are supportive of this action and keen to consider a collaborative approach. This would allow for shared outputs from both of our kerbside waste collection services.</p>
43	<p>Action 16 Waste Data and Licensing System</p>	<p>We are supportive of this action and note this has been a collaborative project in which several councils have been engaged for some time now. We are pleased to see that collaboration on this with other Territorial Authorities is</p>

		noted and we look forward to continuing to work together in this space.
43	Action 18 Construction and Demolition waste	<p>We suggest that consideration be given to expanding this action to include actions that are immediately implementable, practical, and cover the wider sector.</p> <p>We acknowledge that work needs to be done collaboratively between the two councils to ensure that we have an aligned approach to dealing with construction and demolition waste and ensure that we have adequate facilities within our sub-region, and across the wider Bay of Plenty and Waikato regions to address these waste streams.</p> <p>We seek further consideration of actions around this waste stream, including diversion trials and education with the building and construction sector. There are opportunities for more action to be taken in this space, e.g., concrete can be crushed on Industrial Zoned land in the City, but we are not aware of any current sites operating at scale.</p> <p>We recommend that a stocktake of services be undertaken, given that we perceive that there is a lack of appropriate sites to receive construction and demolition waste across the sub-region. A stocktake of this nature could be used to facilitate engagement with the wider industry and to inform future regional planning.</p> <p>Regulatory tools could also be identified. A future regulatory tool may be through the use of Bylaw provisions. Our WBOPDC Waste Management and Minimisation Bylaw 2022 allows us to introduce the requirement for a waste plan for activities that require a building consent (subject to some limits). We are pleased to see that TCC have incorporated the management and disposal of construction and demolition waste into both the draft Bylaw but consider the education and implementation around this could be included as a specific action.</p>
44	Actions 23 and 24 Food Waste	We are very supportive of both these actions and TCC taking a proactive approach to dealing with food waste.
44	Action 25 Energy from Waste Schemes	We suggest that the wording used in the draft WMMP could be amended to be more ambivalent regarding TCC 'support' for energy from waste schemes. More nuanced

		consideration of their role in a circular economy and specific suitability would be necessary.
44	Action 26 Medical and Dental Waste	We are supportive of the collaboration with the medical / health industry to inform them of disposal options available for medical and dental waste. Focus on this problem area is needed to divert unnecessary waste being sent to landfill.
44	Action 27 Diversion of Nappies and Sanitary Products	We are supportive of the collaboration with the health industry, childcare facilities, and rest homes to develop options to increase diversion of nappies and sanitary products from landfill. This action also generates a need to consider processing facilities which could be recognised in this action.
45	Action 28 Business and community enterprise	We are supportive of investigating and implementing options that assist with moving towards the goal of having a circular economy. However, the wording used in the draft WMMP is generic, and would be better focussed on key areas or waste streams of concern.
45	Action 32 Te Maunga Resource Recovery Park	We are strongly supportive of this action. Te Maunga is currently the key transfer station in the sub-region and also acts as a consolidation point for waste from the wider region. Improvements to this facility are welcomed and the actions identified are supported. <i>We would suggest 'construction and demolition waste sorting and processing' also be identified here. This would recognise the importance of this waste stream and the plans to address it through Te Maunga. This would be additional to the diversion trials.</i> <i>We are pleased to see 'supporting community-led' resource recovery identified here. However, we suggest that this could be considered as an action on its own. WBOPDC is currently investigating how community-led resource recovery facilities could contribute to both waste outcomes and community outcomes in the Western Bay of Plenty District. Consideration of how this may interface with facilities and community groups in the wider sub-region should be considered.</i>

46	Action 35 Regional Waste Processing Facilities	<p>We are pleased to see that collaboration with Ministry for the Environment, Regional Council, other territorial authorities, and private waste operators is specifically recognised in this action. Similar wording may be considered to be used elsewhere in the document.</p> <p>We recognise that several plastic streams could be a focus area but consider this action could be broadened to enable all future opportunities to be capitalised on.</p>
46	Action 36 Research and Development Centre	<p>We seek further information on the investigation, consideration and support of the establishment of a research and development centre for re-use and remanufacture of products and materials.</p> <p>We agree that this is an important initiative to undertake but we believe that more information needs to be made available, around what discussions and plans have been prepared, as we note the implementation of this action is planned for the 2022/23 years.</p>
46	Actions 38-42 Communicaton and Education	<p>We support the targeted behaviour change programmes and education initiatives.</p> <p>We agree that education and behaviour change is often key to successful services. Behaviour change programmes have the ability of making long term and lasting changes to behaviour and these that relate to waste can have positive impacts on the diverting of waste to landfill.</p>
47	Action 43 Enhance Economic Development	<p>We are pleased to see that collaboration around enhancing economic development through waste management and minimisation solutions is included. The potential of the circular economy can make a big contribution to the sub-region's economic profile.</p> <p>We look forward to working with TCC on exploring and delivering on this action.</p>
47 & 48	Actions 45 and 46 Tauranga City Council Waste Diversion	<p>We are supportive of TCC taking action to ensure that it is sustainably managing its own waste and implementing changes in its own buildings and other Council Controlled Organisations that result in further waste reduction and diversion from landfill.</p>

Through out	Action Plan - Timings	Throughout the draft WMMP – Action Plan, there are a lot of actions for the 2022/23 Financial Year. We suggest that the timeframes and work programmes may need to be reconsidered to adequately reflect resourcing and the likely duration of some of these actions.
Through out	Terminology - Regional	Consideration should be given in the WMMP to the use of ‘regional’, ‘sub-regional and ‘cross-regional’ and ‘Bay of Plenty’ and ‘Western Bay of Plenty’. In several instances it is unclear where the focus lies, and some rephrasing may be required. We also suggest that conversations with relevant partners on these actions be undertaken prior to approval, to ensure alignment.

10 INFORMATION FOR RECEIPT