



25/07/2025

National Direction Consultation
Ministry for the Environment
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Submitted via: Citizen Space ([Infrastructure, development and primary sector national direction - Ministry for the Environment - Citizen Space](#))

Tēnā Koutou,

Submission from the Rangitikei District Council on Proposed Changes to the Resource Management Act 1991 National Direction - Packages 1, 2 and 3

Rangitikei District Council (Council) would like to thank the Ministry for the Environment for the opportunity to make a submission on the first three packages of proposed changes to National Direction under the Resource Management Act 1991 (RMA).

Council would like to indicate its intention to submit on package four “Going for Housing Growth” separately.

Council does not wish to be heard in support of its submission.

1. General Comments:

- 1.1. Council recognises the benefit of National Direction where there is a need to have consistency of planning provisions which apply to common issues across New Zealand. Council also understands the need to update and revise the National Direction framework to ensure it is fit for purpose and in recognition of the wider reform of the planning system, however, Council does question the timing of this (especially in terms of implementation).
- 1.2. The existing National Direction instruments under the RMA have been a source of frustration and uncertainty, primarily due to inconsistencies and difficulties in reconciliation between instruments due to factors such as unclear or conflicting direction and/or a lack of hierarchy to aid decision-makers.
- 1.3. It is unfortunate that the proposed changes do not appear to address the issue of hierarchy between instruments. In fact, the use of the phrase ‘*recognise and provide for*’ throughout the different instruments potentially erodes the significance that this phrase has held and its place in the hierarchy established by Part 2 of the RMA.

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- 1.4. An overarching prioritisation framework is needed to assist decision-makers in deciding which National Direction policy or matter is to prevail where they have similar levels of directive wording, but conflict. This would greatly assist decision-makers, increase efficiencies, and better facilitate consistency in the roll-out of these new and revised instruments. It is hoped that this will be addressed in the upcoming reform, noting that in the interim this will continue to create complexities for decision-maker.
- 1.5. Council seeks that the use of definitions and terminology between the different national direction instruments is clear and consistent. When finalising the drafting of these instruments it is recommended that time is taken to ensure that there is consistency across them, and if there is intentional inconsistency that this is clearly explained.
- 1.6. Council requests the release of exposure drafts for all the instruments that are proposed before these are enacted. This will provide an opportunity for the sector to help identify any potential issues and facilitate the smoother implementation of these instruments.

Recommendations or requested amendments:

- a. Council seeks an overarching prioritisation framework to assist decision-makers in deciding which National Direction policy or matter is to prevail where they have similar levels of directive wording, but conflict.
- b. Council seeks that the use of definitions and terminology between the different national direction instruments is clear and consistent. If there is intentional inconsistency that this is clearly explained.
- c. Council requests the release of exposure drafts for all the instruments that are proposed before these are enacted.

Comments on Packages 1-3:

- 1.7. Council has an interest in all the packages and how they interrelate with each other as well as with the planning system and wider reform.
- 1.8. However, for efficiency Council has focused its submission on specific instruments within packages 1 and 2, and the key matters within the instruments to highlight areas of support or where Council would like to seek amendments. Council's submission on package 3 is briefer and more high level.

2. Package 1: Infrastructure and Development

Proposed National Policy Statement for Infrastructure (NPS-I)

- 2.1. Council supports a consistent approach to decision-making for infrastructure renewal, maintenance, and development. Council is supportive of being more enabling of nationally, regionally, and locally significant infrastructure. This can (and should) still be done in a way that provides for the appropriate management of adverse effects on the environment.

- 2.2. The proposed objective identifies infrastructure outcomes that planning decisions contribute to. These outcomes are generally supported by Council. However, Council seeks that the final drafting of this objective (or objectives) for the NPS-I is clear and stipulates whether there is a hierarchy among the outcomes.
- 2.3. Council does not support a blanket provision for infrastructure to be located in our most precious and fragile environments, especially where there are alternatives that could be reasonably explored. With “*operational need*” to be facilitated through the NPS-I, clear and measurable criteria of when this is appropriate should be established. While efficiency and cost effectiveness are important, they should be balanced against protecting our most significant and/or sensitive environments.
- 2.4. Council supports proposals that will require decision-makers to have regard to spatial plans. Spatial plans can have a beneficial role in co-ordinating the provision of strategically important infrastructure with subdivision and development, and managing the impacts of one on the other.
- 2.5. Council encourages major infrastructure providers to be working more collaboratively together to understand where/if efficiencies can be achieved in terms of co-ordinating the timing of infrastructure renewals, upgrades, or the installation of new infrastructure.
- 2.6. Council considers that although the proposed policies will increase consistency, the compliance burden appears to fall disproportionately on decision-makers (typically local authorities) with little direction being focused on the duties of infrastructure providers to consider solutions which lessen the impact of their proposed works on the wider environment. The adverse effects of upgrading, expanding, or establishing infrastructure should still be considered and reasonably addressed in relation to the receiving environment.
- 2.7. Council would also like to see stronger guidance on how to manage the interface between infrastructure and the natural and built environment, particularly where there are competing National Direction policies (such as effects of new infrastructure occurring alongside new urban development). Differentiating in Policies 9 and 10 between planned infrastructure (where exact effects are largely unknown) and consented infrastructure (where effects are known) would be useful for decision-makers.

Recommendations or requested amendments:

- d. Council seeks that the final drafting of the objective (or objectives) for the NPS-I is clear and stipulates whether there is a hierarchy among the outcomes.
- e. Council requests the NPS-I is amended to include clear and measurable criteria for when “operational need” is considered to be appropriate.
- f. Council requests the NPS-I be amended to outline the duties of infrastructure providers to offer solutions which manage the impact of their proposed works on the wider environment.
- g. Council recommends amending Policies 9 and 10 to differentiate between planned infrastructure (where exact effects are largely unknown) and consented infrastructure (where effects are known) as this would be useful for decision-makers.

National Policy Statement for Renewable Electricity Generation (NPS-REG)

- 2.8. Council acknowledges the need for increased generation of renewable energy required to achieve New Zealand’s climate goals and a better diversity of supply.
- 2.9. Council generally supports a more consistent and efficient approach to consenting and decision-making, but the process needs to adequately provide for local community/Council input in instances that a consent is not being processed by the local authority where the activity is proposed to occur.
- 2.10. Policy C1 intends to clarify the meaning of “*operational need*” and “*functional need*” in relation to the location of renewable energy generation (REG). This should go further to specify that where operational need is being utilised this does not negate the obligation to genuinely explore alternative locations. There needs to be a balance struck between enabling REG whilst still protecting our most significant and/or sensitive environments.
- 2.11. Policy D’s use of words “*protect*” and “*avoid*” in regard to adverse effects on REG infrastructure is too restrictive as the wording proposed is not limited to the “*reverse sensitivity effects*” but any adverse effects of new activities (regardless of their significance). Council seeks that this wording be amended to more clearly link this to reverse sensitive effects.

Recommendations or requested amendments:

- h. Council seeks that Policy C1 should specify that where operational need is being utilised this does not negate the obligation to genuinely explore alternative locations.
- i. Council requests that the wording of Policy D is amended to include reference to ‘*effects which will impact the safe and efficient operation of REG infrastructure*’.

National Policy Statement on Electricity Transmission - renamed Energy Networks (NPS-EN)

- 2.12. Council considers that, overall, the NPS-EN will promote a greater and more thorough consideration of the benefits of electricity networks (EN).
- 2.13. However, this can be done in a way that still ensures adverse effects of EN are appropriately considered, especially that decision-makers can still consider and adequately address effects on our most significant and/or sensitive environments.
- 2.14. The proposed wording for Policy 2.1) is “*Planning decisions must recognise and provide for EN activities that have an operational need or functional need to be in particular environments, including in areas with section 6 RMA values, with unavoidable adverse effects on those environments.*” Council accepts that EN have a genuine need to traverse significant/sensitive environments. However, Council requests that the proposed wording of P4.1) c) be strengthened as the current wording only requires decision-makers to “*have regard to*” the management of adverse effects on these environments. This wording could be strengthened to “*ensure that any adverse effects have been appropriately avoided, remedied or mitigated by the route, site, and method selection*”. Noting that this change would be balanced against Policy 4.1) b) which “*recognises and provides for*” these activities to be in these environments and Policy 4.1) d) which recognises that some adverse effects are unavoidable.
- 2.15. Council supports the inclusion of provision, operation, and maintenance of distribution lines (i.e. those which are not part of the national grid) as these are important. However, care needs to be taken that the distribution lines are not accorded exactly the same protections as the national grid. Distribution lines are more numerous and traverse existing urban and rural areas where the settlement pattern is long established, and therefore, it is harder to protect them from effects of development.
- 2.16. Council supports a requirement for developers, as part of their consent application, to demonstrate how electricity is to be provided to a development and how impacts on existing EN infrastructure will be avoided or minimised.
- 2.17. Council is generally supportive of engaging with EN operators to facilitate the medium to long-term strategic planning for the construction, operation, maintenance, and upgrade of the EN. Council recognises the value of spatial planning as this gives the opportunity for us to better facilitate EN development, where appropriate. Council encourages EN operators to be proactive in this space as well.

Recommendations or requested amendments:

- j. Council requests that the proposed wording of P4.1) c) be strengthened to something like to “*ensure that any adverse effects have been appropriately avoided, remedied or mitigated by the route, site, and method selection*”.

National Environmental Standards for Electricity Transmission Activities – renamed Electricity Network Activities (NES-ENA)

- 2.18. Council is generally supportive of restrictions on certain activities within the National Grid Yard, and of requiring greenfield subdivisions to provide setbacks or transmission line corridors, provided these do not have to be maintained by the Council or counted towards reserves contributions that might be made by a developer as part of a development.
- 2.19. Council does not oppose the inclusion of provisions for electric vehicle (EV) charging infrastructure. Council is not opposed to EV charging infrastructure being permitted in a transport corridor subject to:
- the written agreement of the transport corridor owner being obtained and provided to the relevant territorial authority prior to installation of the infrastructure; and
 - that the positioning of the infrastructure is such that it does not interfere with traffic safety (e.g. blocking sightlines at intersections, railway crossings or vehicle crossings) and pedestrian/ wheelchair movements on footpaths.
- 2.20. Council requests that R16 4)a) be amended to include Rural Lifestyle Zone as a location that EV infrastructure is not permitted to be located on. This zone can be quite closely aligned with a low-density residential zone.

Recommendations or requested amendments:

- k. Council requests that if EV charging infrastructure is permitted in a transport corridor then:
- the written agreement of the transport corridor owner shall be obtained and provided to the relevant territorial authority prior to installation of the infrastructure; and
 - that the positioning of the infrastructure is such that it does not interfere with traffic safety (e.g. blocking sightlines at intersections, railway crossings or vehicle crossings) and pedestrian/wheelchair movements on footpaths.
- l. Council requests that R16 4)a) be amended to include Rural Lifestyle Zone as a location that EV infrastructure is not permitted to be located on.

National Environmental Standards for Telecommunication Facilities (NES-TF)

- 2.21. Council recognises that the amendments aim to enable greater efficiency in the deployment of telecommunications infrastructure and enable more modern and resilient telecommunication services to meet the needs of communities.
- 2.22. However, these standards need to also ensure that the operational needs of local telecommunications infrastructure are balanced against adverse effects on local communities, such as the effects of the substantial heights of these network utilities on

neighbouring properties which in the case of towns in the Rangitikei will likely primarily contain single storey buildings.

- 2.23. Council considers linking the height (and other dimensions) to zones will provide greater certainty and ease of administration than linking the height to existing cell phone towers and street lights (which may be of variable height, and too low to provide optimal coverage in some instances).
- 2.24. Council has concerns that the proposed provisions for antennas on buildings (including increasing the permissible height to 10m above the roof of buildings) would be visually disproportionate for rural town centres such as those in the Rangitikei (where most buildings are below 9m in height).
- 2.25. Council considers the proposed provisions will assist with enabling a more efficient roll-out of mobile and land-based fixed-wireless telecommunications. However, Council notes that the proposed changes do not significantly ease the ability to roll-out fibre which more rural areas with higher population densities would benefit from as fixed wireless towers are increasingly congested and do not deliver upload and download speeds necessary for full participation in the modern digital economy.

Recommendations or requested amendments:

- m. Council requests that more thought is given to rural towns and settlements with regards to the “one size fits all” approach to telecommunication infrastructure provisions. For example these towns and settlements generally contain buildings of 9m in height or less, and therefore, the proposed heights in the NES-TF have greater visual effects.

Proposed National Environmental Standards for Granny Flats (Minor Residential Units) (NES-GF)

- 2.26. Council does not support the introduction of the NES-GF as our current District Plan provisions are arguably more permissive, and the bulk and setback provisions are more appropriate for our local context. The Rangitikei District Plan enables multiple dwellings (not limited to minor residential units) on a site in the General Residential Zone subject to compliance with some fairly permissive standards. Up to two dwellings are permitted for most sites within the Rural Lifestyle and General Rural Zones.
- 2.27. The NES-GF will create a situation where for the most part the Rangitikei District Plan is more permissive but some provisions in the NES are more permissive (e.g. the 50% site coverage), which means Council will have to assess both regulations depending on which provision is more lenient. This results in unnecessary complexity for plan users.
- 2.28. Council would prefer a National Policy Statement (NPS) on minor residential units. A NPS could still ensure that these units are more consistently provided for across the country whilst also ensuring that there is flexibility around how best to enable them.

Where a Council already has more permissive provisions in its District Plan then it would not need to spend time figuring out how to implement another new national regulation.

- 2.29. If the NES-GF is enacted then Council supports the use of “Minor Residential Unit” in the NES and seeks the removal of all references to “Granny Flat”. Please call these dwellings what they are, as their use is not restricted to “grannies” or family members.
- 2.30. Council wants to ensure that no restrictions are placed on Council’s ability to rate for these units. Minor residential units should contribute fairly for the services that they receive and/or have access to. Councils that charge Development Contributions should also be able to recoup these for minor residential units.
- 2.31. Council requests that the setback standards for the minor residential units should be consistent with the zone requirements of the relevant District Plan. Rural Zone setbacks often protect existing rural uses from reverse sensitivity. As a minimum Council requests that the 2m setback from the front boundary for the Residential Zone should be increased to at least 3m. These units will be small buildings, and likely constructed from lighter materials, therefore, they will be more susceptible to adverse noise effects from vehicles or pedestrians.
- 2.32. Council recommends that these units are required to have an outdoor space (even just a small one) for their exclusive use, which is free of car parking and manoeuvring areas. It is understood that the Government has no appetite for local authorities to be stipulating the orientation or imposing access requirements from habitable rooms to outdoor spaces. However, these units could be inhabited by families and having a small (e.g. an area capable of containing a circle with a diameter of 3m), private outdoor space for family members to enjoy some fresh air is not overly onerous.
- 2.33. Council also recommends that these units are able to be accessed separately to the main dwelling on a site from the road, even if this is just via a pedestrian access.
- 2.34. Council seeks clarity on how the maximum of 50% site coverage is measured (i.e. does this include all buildings on the site not just the residential units).
- 2.35. Council requests the ability of local authorities to make consequential amendments to our District Plans (if needed) without a Schedule 1 process to enable compliance with this regulation.

Recommendations or requested amendments:

- n. Council recommends that the NES-GF is not enacted and a NPS for minor residential units is drafted and enacted in its place.
- o. If the NES-GF is enacted then Council supports the use of “Minor Residential Unit” in the NES and seeks the removal of all references to “Granny Flat”.
- p. Council requests that the setback standards for the minor residential units are consistent with the zone requirements of the relevant District Plan. If this amendment is not accepted then Council seeks that the 2m setback from the front boundary for a Residential Zone should be increased to at least 3m.
- q. Council recommends that these units are required to have an outdoor space (even just a small one) for their exclusive use, which is free of car parking and manoeuvring areas.
- r. Council recommends that these units are able to be accessed separately to the main dwelling on a site from the road, even if this is just via a pedestrian access.
- s. Council seeks clarity on how the maximum of 50% site coverage is measured (i.e. does this include all buildings on the site not just the residential units).
- t. Council requests the ability of local authorities to make consequential amendments to our District Plans (if needed) without a Schedule 1 process to enable compliance with this regulation.

Proposed National Environmental Standards for Papakāinga (NES-P)

- 2.36. Council supports the concept of providing for papakāinga on Māori land as a Permitted Activity (subject to the standards and conditions proposed). However, Council recommends there should be a greater ability for papakāinga to be built on General Land owned by Māori, especially Treaty Settlement Land. Many iwi and hapū do not own land that is one of the types provided for as a Permitted Activity and they should not be unfairly disadvantaged.
- 2.37. Council is not opposed to the non-residential activities proposed to be “ancillary activities” under the NES and considers these to be sufficiently broad to cover the foreseeable range of activities that are likely to be undertaken in proximity to papakāinga housing.
- 2.38. Guidance information on implementation of the NES-P and how it interfaces with other regulation (e.g. the regional plan and Building Act 2004) would be useful to facilitate consistent implementation.
- 2.39. Although this is not within scope for this consultation Council would like to note that funding is often a significant barrier for papakāinga development. Council encourages the Government to consider what mechanisms could be put in place to address the funding barrier.

Recommendations or requested amendments:

- u. Council recommends there should be a greater ability for papakāinga to be built on General Land owned by Māori, especially Treaty Settlement Land.
- v. Council requests guidance information on implementation of the NES-P and how it interfaces with other regulation (e.g. the regional plan and Building Act 2004).

Proposed National Policy Statement for Natural Hazards (NPS-NH)

- 2.40. Council is generally supportive of a more consistent, risk-based approach to managing natural hazards within the resource management system. However, clear guidance is requested to assist with the consistent implementation of the proposed NPS-NH.
- 2.41. Council seeks that the proposed objective is redrafted to more clearly outline the desired outcome(s).
- 2.42. Council supports the NPS-NH applying to the seven natural hazards that it specifically lists while allowing local authorities to assess other hazards that may be present in their locality.
- 2.43. Council agrees that that primary production activities should be exempt in general from the NPS-NH.
- 2.44. The lack of a directive framing of which approach should be taken to different levels of risk as part a 'proportionate management' approach could lead to councils taking widely different approaches. The NPS-NH directs the decision about what is 'significant risk', but does not provide direction on how to respond to this (e.g. when to avoid development, what level of risk needs to be mitigated and to what level). Stronger policy wording is needed to assist councils in being effective in taking appropriate measures and making appropriate and consistent decisions.
- 2.45. Council does not oppose the NPS-NH directing councils to use best available and most up-to-date information. However, the purpose for which this information was developed, and its reliability is important (e.g. some information produced for emergency management purposes may not be appropriate to be relied on in a planning process). Council requests legal protection against challenges where councils have acted in good faith but had to rely on information that was incomplete or subject to dispute because no other information is available, similar to recent LGOIMA changes.
- 2.46. The NPS-NH refers to "*local authorities*" and Council recommends that it should be tested to see whether it would be more appropriate to refer to "*decision-makers*" to ensure that this does not create implementation issues where a decision-maker is not a local authority (e.g. an expert commissioner or panel or the Environment Court).

Recommendations or requested amendments:

- w. Council requests clear guidance to assist with the consistent implementation of the proposed NPS-NH.
- x. Council seeks that the proposed objective is redrafted to more clearly outline the desired outcome(s) of the NPS-NH.
- y. Council recommends stronger policy wording is needed to assist councils in being effective in taking appropriate measures and making appropriate and consistent decisions in relation to the NPS-NH.
- z. Council requests legal protection against challenges where councils have acted in good faith but had to rely on information that was incomplete or subject to dispute because no other information is available, similar to recent LGOIMA changes.
- aa. The NPS-NH refers to “local authorities” and Council recommends that it should be tested to see whether it would be more appropriate to refer to “decision-makers”.

3. Package 2: Primary Sector

National Environmental Standards for Commercial Forestry (NES-CF)

- 3.1. The proposed amendment to Regulation 6(1)(a) to be more specific about the criteria for how councils can impose stricter rules than the NES-CF is not supported by Council. Council recognises the Government’s intention to increase certainty and consistency for the sector, however, the ability to impose stricter rules that are appropriate in a local context is important.
- 3.2. Council is concerned about the requirement that underlying risks be identified through mapping at a 1:10,000 scale or a digital elevation model. Some risks may be difficult to accurately map at that scale, and regional councils may not have good knowledge of the presence of territorial authority and other utility provider infrastructure.
- 3.3. Regulation 6(4A) enables a rule in a plan for afforestation to be more stringent or lenient than in Subpart 1 of Part 2 of these regulations. Council does not support the proposed removal of 6(4A) as it means that the regulations are absolute with much less discretion for local authorities to develop plan rules more appropriate to local circumstances. There is a risk that not having local discretion (except where the amendments specifically provide for it) could lead to higher rates of exotic afforestation in areas where this could be inappropriate.
- 3.4. The proposed amendment to regulation 69 to require a slash mobilisation risk assessment (SMRA) for all forest harvests as part of the existing harvest management plan is generally supported. However, it is noted the requirement to obtain a resource consent only applies where risks are assessed as high and that as a Controlled Activity, a consent application cannot be declined. Council would prefer these activities to be Restricted Discretionary so there is the ability to decline a consent if risk avoidance or mitigation measures are inadequate.

- 3.5. Council also recommends that territorial authorities be given the opportunity to input into SMRA where appropriate to ensure that risks to our infrastructure are understood and appropriately managed.

Recommendations or requested amendments:

- bb. Council seeks the retention of Regulation 6(4A).
- cc. Council recommends that non-compliance with Regulation 69 should be a Restricted Discretionary Activity.
- dd. Council requests that territorial authorities be given the opportunity to input into SMRA where appropriate to ensure that risks to our infrastructure are understood and appropriately managed.

National Policy Statement for Highly Productive Land (NPS-HPL)

- 3.6. Council is generally supportive of the removal of LUC 3 from being highly productive land (HPL) under the NPS. For clarity Council supports the removal for both urban development and rural lifestyle development. Council recognises that LUC 3 land is important to the rural productive base but flexibility to manage LUC 3 at a regional or local level is preferred.
- 3.7. Many of the urban settlements in the Rangitikei District are surrounded by LUC 2 or LUC 3 land and this restricts our ability to provide for future urban growth.
- 3.8. If LUC 3 land is to be retained as HPL under the NPS Council seeks that urban growth is more easily facilitated for settlements where they are entirely surrounded by HPL but have a shortfall in residentially zoned land. One way this could be achieved would be by exempting HPL for land within 1km (or a similar specified area) of the urban edge where there is a proven need to accommodate growth.
- 3.9. Council also wants to highlight an issue around land classification in the Rangitikei District. This District has experienced an issue where the NZLRI contains multiple datasets that show conflicting information. A substantial portion of the southern part of the District was historically identified as LUC 2s2, however, more recently Manaaki Whenua Landcare Research and Horizons Regional Council identify this area as LUC 3s-27. Council requests that this land be identified as LUC 3. The maps included in the Package 2: Primary Sector Discussion Document on pages 35 and 36 appear to indicate that this land is LUC 2. Council requests that going forward maps and any land area calculations of LUC 2 should exclude this land and classify it as LUC 3.

Recommendations or requested amendments:

- ee. Council supports the removal of LUC 3 from being highly productive land (HPL) under the NPS.
- ff. If LUC 3 land is to be retained as HPL under the NPS Council seeks that urban growth is more easily facilitated for settlements where they are entirely surrounded by HPL but have a shortfall in residentially zoned land.
- gg. Council seeks acknowledgement of the issue where the NZLRI contains multiple datasets that show conflicting information which impact classification of a substantial amount of land in the southern part of our District. Council requests where land was historically identified as LUC 2s2, but more recently identified as LUC 3s-27 that this land be confirmed as being LUC 3.

Multiple instruments for quarrying and mining provisions

- 3.10. Council supports improving consistency across different national direction instruments and recognises the need to support housing and business growth.
- 3.11. Council is supportive of quarrying being easier to consent as there is a genuine need for these resources and they do benefit our communities (e.g. these materials are used in the construction of our roads, for building materials, and therefore, support the creation of jobs etc.). The consent process should still ensure the adequate management of adverse effects on the environment.
- 3.12. Council is less supportive of a blanket enabling of mining activities. Council recommends a “gateway type” test for mining activities in the most significant and/or sensitive environments is put in place. Council also recommends retaining the need to demonstrate “public benefit”.

Recommendations or requested amendments:

- hh. Council recommends a “gateway type” test for mining activities in the most significant and/or sensitive environments is put in place.
- ii. Council also recommends retaining the need to demonstrate “public benefit”.

4. Package 3: Freshwater

- 4.1. Council’s submission on the freshwater package is limited, given this package relates more to Regional Council functions.
- 4.2. However, Council would like to indicate its general support of Te Mana o Te Wai. Noting that Council recognises that this concept may hold different meaning for different iwi and hapū and this is something that could be worked through at a local level.

- 4.3. It is Council's preference that the hierarchy of obligations remain. However, if the Government's favoured approach is to rebalance the objectives to have an equal weighting, then it is requested that these be underpinned by strong environmental bottom lines.

5. Conclusion

Council would like to thank the Ministry for the Environment for the opportunity to provide feedback on this important work. Council would welcome the opportunity to be involved in any workshops or hui about the packages as they progress further through the process.

Ngā mihi,



Andy Watson
Mayor of the Rangitikei



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