

Submission on Proposed Environmental Reporting Bill  
Ministry for the Environment  
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**Waitaki** DISTRICT  
COUNCIL

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**Submission from: Waitaki District Council**

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Officers of the Waitaki District Council (WDC) support the introduction of a proposed Environmental Reporting Bill which seeks to provide clearer direction to local authorities on their responsibilities for state of environment reporting under the Resource Management Act 1991.

The following section of this submission will discuss, where necessary, the concerns WDC officers have with the proposed Bill.

1. It is not clear how the PCE will extract relevant environmental information on the topics of land and biodiversity from territorial local authorities in order to inform the state of environment report.
2. Until such time as the NPS on Indigenous Biodiversity is finalized, we would be concerned that our obligations under this may be in conflict with any reporting requirements of the proposed Bill.
3. Biodiversity protection under section 6 (c) RMA by Councils is undertaken using a variety of regulatory and non-regulatory methods. Monitoring of this needs to take these methods into account.
4. Likewise, district/city council stock-takes of biodiversity will vary from nil to comprehensive depending on what stage they are at with ecological studies. The resource requirements to undertake these is often quite large relative to the land area and population (rating) base of councils. For comprehensive and five yearly monitoring of the state of the biodiversity resource will place further pressure on these councils. Assistance through other agencies (e.g. Landcare Research) would help to ease this resource pressure. The WDC recognize that some form of measure is needed to gauge the level of success of biodiversity protection measures, however the frequency, extent and cost of this is of concern.

5. There is no definition around what will be monitored under the topic of land. Changes in land use can be both easy and difficult to monitor, for example rural to urban land use is a simple measure, however changing rural land uses can change on a seasonal and annual frequency. ✓
  
6. The proposed Bill does not take into account (unless monitoring of land includes urban changes), the effectiveness of city and district plans in providing a sustainable urban form. Recent debate around spatial planning seems to suggest a failure of the RMA effects based regime to adequately deal with this issue. Rather, the more successful urban spatial planning (e.g. Greater Christchurch Urban Development Strategy, Western Bay of Plenty Smart Growth) has been carried out under the Local Government Act.

The Waitaki District Council is happy to be contacted by the Ministry for the Environment to clarify any point raised in this submission

Yours Sincerely

**On behalf of the Waitaki District Council**