



Section 32 report: energy, infrastructure and waste

Quality for Life



greater WELLINGTON
REGIONAL COUNCIL

Environment



Section 32 Report

Energy, infrastructure and waste

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1. Introduction

This report presents the Section 32 evaluation in accordance with the Resource Management Act 1991, “Consideration of alternatives benefits and costs” for the proposed Regional Policy Statement on the topic of the energy, infrastructure and waste. Section 32 states:

32 *Consideration of alternatives, benefits, and costs*

(1) In achieving the purpose of this Act, before a proposed plan, proposed policy statement, change, or variation is publicly notified, a national policy statement or New Zealand coastal policy statement is notified under section 48, or a regulation is made, an evaluation must be carried out by—

.....

(c) the local authority, for a policy statement or a plan (except for plan changes that have been requested and the request accepted under clause 25(2)(b) of Part 2 of Schedule 1); or

(3) An evaluation must examine—

(a) the extent to which each objective is the most appropriate way to achieve the purpose of this Act; and

(b) whether, having regard to their efficiency and effectiveness, the policies, rules, or other methods are the most appropriate for achieving the objectives.

....

(4) For the purposes of [[the examinations referred to in subsections (3) and (3A)]], an evaluation must take into account—

(a) the benefits and costs of policies, rules, or other methods; and

(b) the risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the policies, rules, or other methods.

(5) The person required to carry out an evaluation under subsection (1) must prepare a report summarising the evaluation and giving reasons for that evaluation.

(6) The report must be available for public inspection at the same time as the document to which the report relates is publicly notified or the regulation is made.

1.1 Structure of this report

Section 2 of this report outlines the regionally significant issues identified and the process of identification.

Section 3 outlines the appropriateness of each objective in accordance with the purpose of the Resource Management Act.

Sections 4, 5 and 6 then evaluate the most appropriate policy and method options to achieve each objective. When evaluating the policy and method options, the range of options available is outlined first, and then each option is evaluated. There are four types of options discussed in each instance. These are:

(a) Regulatory direction to district and/or regional plans and/or the Regional Land Transport Strategy

This is where a regional policy directs matters that must be provided for within district and/or regional plans, or the Regional Land Transport Strategy. The method sets out when the provisions are to be included.

(b) Regulatory direction as to matters to be given particular regard in resource management decision making

This is where a regional policy sets out specific matters that are to be given “particular regard” when making resource management decisions. The method sets out when these matters are to be considered. This may include resource consent decisions, decisions on notices of requirements or when making decisions about reviewing, varying, replacing or otherwise changing district and/or regional plans.

(c) Non-regulatory options

This is where a regional policy and a method specifies non-regulatory programmes or action that will be put in place. The non regulatory methods include:

- provision of information or guidance
- integrating management
- identification or investigation
- providing support.

(d) Doing nothing

This is where no intervention, either regulatory or non-regulatory will occur.

Determining the most appropriate policies and methods is based on an assessment of the *effectiveness* and *efficiency* of the policy and method options, and the risks of acting or not acting when there is uncertain or insufficient information.

Effectiveness is a measure of how much influence a resource management intervention has or how successful it is in addressing the issues, in terms of achieving the desired environmental outcome. Effectiveness is a cumulative

value, derived from the range of types and scope of influences or impacts of an intervention, towards achieving intended results and environmental outcomes. The effectiveness of an option is not able to be assessed as an absolute value. Rather, options are appraised as to whether they exhibit the qualities which contribute to ‘effectiveness’ and to what degree, and a determination is made as to the cumulative effect.

When evaluating the *efficiency* of the policy and method options both the benefits (social, economic and environmental) and costs (social, economic and environmental) are outlined. Each option is then deemed to be either efficient or inefficient. The following diagram outlines how this assessment is undertaken.

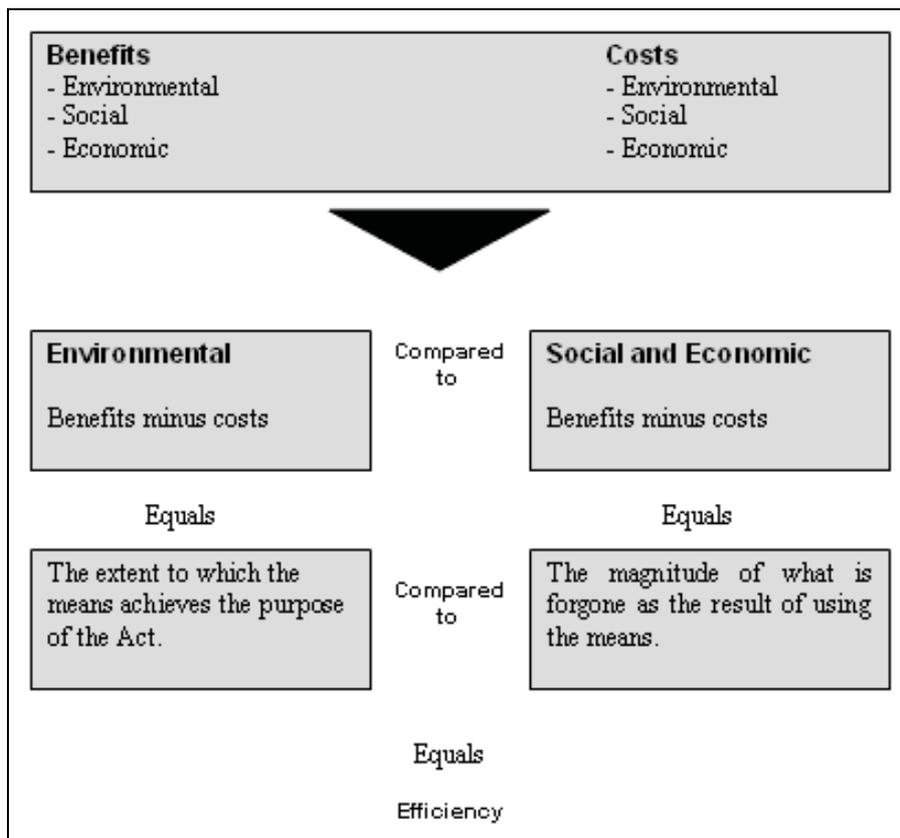


Figure 1: Deriving efficiency from benefits and costs

The evaluation of ‘efficiency’ will result in either a positive or negative result in terms of efficiency. Alternatively, if efficiency is expressed as a cost/benefit ratio, it will be either greater than or less than 1. In the event the ratio is considered to be less than 1, the option can be considered efficient, in that the sum of the benefits outweigh the sum of the costs. In the event the ratio is deemed to be greater than 1, the option can be considered to be inefficient, in that the sum of the costs outweigh the sum of the benefits. It is important to note that in this evaluation of ‘efficiency’, absolute values for each of the variables considered pertinent (i.e. identified as either a cost or a benefit within the evaluation of the options) are not available. Rather, the analysis has endeavoured to present an accurate appraisal of the relative costs and benefits between the options, in order to determine which are efficient and which are

not. A simple yes or no is used to differentiate the options as efficient or inefficient.

2. Regionally significant issues

As part of the energy, built environment and transportation and waste chapters, in the Regional Policy Statement for the Wellington region (1995), the issues were evaluated and reviewed using:

- Measuring up: The state of the environment report for the Wellington region (2005) and the Built Environment and Transportation and Waste background reports (2005)
- Regional Policy Statement Evaluation Reports for Built Environment and Transportation, Waste and Energy (2006)
- Our region – their future: A discussion document on the review of the Regional Policy Statement for the Wellington Region (2006)
- Criteria to ensure the issues are regionally significant, are ‘resource management’ matters and appropriate for inclusion in the Regional Policy Statement (see Appendix 1 for a copy of the criteria).

The resulting issues included in the proposed Regional Policy Statement on energy, infrastructure and waste are:

Issue 1: Energy

The Wellington region is dependant on externally generated electricity and overseas-sourced fossil fuels and is therefore vulnerable to energy shortages. However, significant renewable energy resources exist within the region.

Issue 2: Infrastructure

Infrastructure enables communities to provide for their social, economic and cultural wellbeing. The management, use and operation of infrastructure can be adversely affected when incompatible land uses occur under, over, on, or alongside.

Issue 3: Waste

We cannot continue to generate the current waste volumes because of the cost of disposal, limited space in existing landfills and because it is inefficient to dispose of potentially valuable resources. Developing new landfills also poses significant challenges economically, environmentally and socially.

3. Extent to which the objectives are the most appropriate

The proposed energy, infrastructure and waste objectives are:

Objective 9: The region's energy needs are met in ways that:

- (a) improve energy efficiency and conservation;
- (b) diversify the type and scale of renewable energy development;
- (c) maximise the use of renewable energy resources;
- (d) reduce dependency on fossil fuels; and,
- (e) reduce greenhouse gas emissions from transportation.

Objective 10: The social, economic, cultural and environmental, benefits of regionally significant infrastructure are recognised and protected.

Objective 11: The quantity of waste disposed of is reduced.

To follow is an outline of the extent to which the energy, infrastructure and waste objectives are the most appropriate way to achieve the purpose of the Resource Management Act.

3.1 Objective 9

Objective 9: The region's energy needs are met in ways that:

- (a) improve energy efficiency and conservation;*
- (b) diversify the type and scale of renewable energy development;*
- (c) maximise the use of renewable energy resources;*
- (d) reduce dependency on fossil fuels; and*
- (e) reduce greenhouse gas emissions from transportation.*

- Objective 9 addresses the vulnerability of supply disruptions to current sources of energy raised in Issue 1, by diversifying and maximising the use of renewable energy resources and reducing dependency on fossil fuels. The objective addresses the second part of the issue by seeking to improve energy efficiency and conservation, reduce dependency on fossil fuels and reduce greenhouse gas emissions from transportation.
- The state of the environment report, Measuring up (2005), noted that finite fossil fuels continued to be the largest, and growing, source of energy, with an increasing proportion coming from imported oil; that transport was the sector showing the most growth in energy use, and the main source of energy-related carbon dioxide emissions; and the objectives of greater

energy efficiency and more renewable energy production did not appear to have been achieved during the previous ten years.

- Comments in response to Our region – their future (2006) recorded support for greater development and use of renewable energy, and building standards to achieve better efficiency. Building standards are, however, unable to be influenced by a regional policy statement. There were also concerns raised about the tension between landscape and other significant values, and wind energy developments. It was also noted that there is insufficient guidance and inconsistent management around electricity transmission and reverse sensitivity issues.
- Findings from the Regional Policy Statement Evaluation Report for Energy (2006) questioned whether, in the absence of any regional-scale information about energy management, there should be any energy provisions at all in a new regional policy statement. The suggestion was, the region could rely on policy guidance in the National Energy Efficiency and Conservation Strategy. On further analysis it is considered important that the Regional Policy Statement contain policies to add value, where it had influence. In particular, informing the development of district and regional plans and resource management decision making on renewable energy, energy efficient subdivision design and travel demand management, and also directing the Regional Land Transport Strategy to promote a reduction in the use and consumption of non-renewable transport fuels and emissions carbon dioxide, and promote the management of travel demand.
- Objective 9 meets Part II of the Resource Management Act by seeking to manage natural resources in a way and at a rate that provides for communities’ social and economic wellbeing. Particular sections of relevance include:

7(b) – the efficient use and development of natural and physical resources

7(ba) – the efficiency of the end use of energy

7(g) – any finite characteristics of natural and physical resources

7(i) – the effects of climate change

7(j) – the benefits to be derived from the use and development of renewable energy.

- Relevant sub sections to Section 30 “Function of regional councils” for objective 3 include:

30(1)(a) – the establishment, implementation, and review of objectives, policies and methods to achieve integrated management of the natural and physical resources of the region

30(1)(b) – the preparation of objectives and policies in relation to any actual or potential effects of the use, development, or protection of land which are of regional significance

- The following policies of the New Zealand Coastal Policy Statement 1994 are relevant to objective 9:

Policy 3.2.1 - Policy statements and plans should define what form of subdivision, use and development would be appropriate in the coastal environment, and where it would be appropriate.

On this basis of the above, objective 9 is the most appropriate for achieving the purpose of the Resource Management Act.

3.2 Objective 10

Objective 10: The social, economic, cultural and environmental benefits of regionally significant infrastructure are recognised and protected.

- Objective 10 addresses Issue 2 by recognising the benefits of regionally significant infrastructure to the community. The objective also addresses the issue of the potential for infrastructure to be adversely affected by incompatible land-use and seeks to protect regionally significant infrastructure from incompatible land-use.
- The objective is necessary to achieve the purpose of the Resource Management Act by managing the use, development and protection of physical resources in a way that enables communities to provide for their wellbeing and health and safety.
- The state of the environment report Measuring up (2005) addressed infrastructure as part of the built environment and transport chapter. It noted that over the ten year period of the operative Regional Policy Statement the region had seen incremental extensions to existing stormwater, wastewater, local water, and road infrastructure.
- Comments in response to Our region – their future (2006) expressed a desire for better integration between land use planning and infrastructure, the need to plan for future growth demands and manage reverse sensitivity effects. Responses also highlighted that an “urban package” would not suffice. There was also a need to look at infrastructure in rural landscapes and in the coastal environment, not just urban areas. Guidance around considering infrastructure to support a compact regional form was also sought. Note: The issues around the development of infrastructure (along with other development) and the region’s form, design and function are specifically addressed by the ‘regional form design and function’ topic and related provisions.
- Findings from the Regional Policy Statement Evaluation Report for Built Environment and Transportation (2006) noted that the issues in the existing built environment and transportation chapter about infrastructure

are still valid, but that the issues in relation to adverse effects, are also addressed by a number of other topics within the Regional Policy Statement (e.g. fresh water, landscape and heritage, coastal environment, etc). The report noted that the importance of regionally significant infrastructure and the integration of land use and infrastructure need to be further addressed. The report recommended changes to the existing objectives in response.

- Objective 10 meets Part II of the Resource Management Act by seeking to manage the use and protection of infrastructure in a way that enables communities to provide for their wellbeing. Particular principles of relevance include:

7(b) – the efficient use and development of natural and physical resources

7(g) – any finite characteristics of natural and physical resources

- Relevant sub sections to Section 30 “Function of regional councils” for objective 10 include:

30(1)(a) – the establishment, implementation, and review of objectives, policies and methods to achieve integrated management of the natural and physical resources of the region

30(1)(b) – the preparation of objectives and policies in relation to any actual or potential effects of the use, development, or protection of land which are of regional significance

30(1)(gb) – the strategic integration of infrastructure with land use through objectives, policies, and methods

- The following policies of the New Zealand Coastal Policy Statement (1994) are relevant to objective 10:

Policy 3.2.1 - Policy statements and plans should define what form of subdivision, use and development would be appropriate in the coastal environment, and where it would be appropriate.

The following policies of the National Policy Statement on Electricity Transmission are relevant to objective 10:

Policy 1- In achieving the purpose of the Act, decision-makers must recognise and provide for the national, regional and local benefits of sustainable, secure and efficient electricity transmission. The benefits relevant to any particular project or development of the electricity transmission network may include:

i.) maintained or improved security of supply of electricity; or

ii.) efficient transfer of energy through a reduction of transmission losses; or

iii.) the facilitation of the use and development of new electricity generation, including renewable generation which assists in the management of the effects of climate change; or

iv.) enhanced supply of electricity through the removal of points of congestion.

Policy 2 -In achieving the purpose of the Act, decision-makers must recognise and provide for the effective operation, maintenance, upgrading and development of the electricity transmission network.

Policy 10 -In achieving the purpose of the Act, decision-makers must to the extent reasonably possible manage activities to avoid reverse sensitivity effects on the electricity transmission network and to ensure that operation, maintenance, upgrading, and development of the electricity transmission network is not compromised.

Policy 11 -Local authorities must consult with the operator of the national grid, to identify an appropriate buffer corridor within which it can be expected that sensitive activities will generally not be provided for in plans and/or given resource consent. To assist local authorities to identify these corridors, they may request the operator of the national grid to provide local authorities with its medium to long-term plans for the alteration or upgrading of each affected section of the national grid (so as to facilitate the long-term strategic planning of the grid).

Policy 12 -Territorial authorities must identify the electricity transmission network on their relevant planning maps whether or not the network is designated

Policy 13 - Decision-makers must recognise that the designation process can facilitate long-term planning for the development, operation and maintenance of electricity transmission infrastructure.

Policy 14 -Regional councils must include objectives, policies and methods to facilitate long-term planning for investment in transmission infrastructure and its integration with land uses.

On this basis of the above, objective 10 is the most appropriate for achieving the purpose of the Resource Management Act.

3.3 Objective 11

Objective 11: The quantity of waste disposed of is reduced.

- Measuring up (2005) reported that dealing with waste is a mounting problem because:
 - some of the materials discarded still have economic value;

- the land used for landfills occurs in/on land that could be used productively;
- landfill disposal activities have adverse effects on the environment.

It also noted that landfills have to be the last resort for unwanted materials, because they produce leachate and methane gas - as materials and organic matter decompose - and because landfill space is finite.

- In 2004 there were ten municipal landfills in the Wellington region. In 2009 there are five, and two more will close over the next ten years. To avoid or reduce the need to develop new landfills and to extend the life of existing landfills, the volume of waste sent to landfills will need to be reduced. In 2007 nearly 400,000 tonnes of 'waste' was sent to landfills in the Wellington region. At least 20 per cent of the region's solid waste, and in some areas as much as 60 to 70 per cent, currently sent to landfills could be recycled or composted. Some materials are not recycled or composted even when they could be, as there is no market for the final product or no industry with the expertise to do the recycling.
- Objective 11, by seeking to reduce waste and new landfills in the region, enables people and communities to provide for their social, economic and cultural wellbeing and for their health and safety. This objective addresses Issue 3 (Waste) and Part II of the Resource Management Act by sustaining the potential of natural and physical resources, safeguarding the life-supporting capacity of air, water soil and ecosystems, and avoiding, remedying and mitigating any adverse effects on the environment. The particular principle of relevance is:

7(b) – the efficient use and development of natural and physical resources

- Relevant sub sections to Section 30 “Function of regional councils” for objective 11 includes:

30(1)(a) the establishment, implementation, and review of objectives, policies, and methods to achieve integrated management of the natural and physical resources of the region.

30(1)(b) – the preparation of objectives and policies in relation to any actual or potential effects of the use, development, or protection of land which are of regional significance.

- Without this objective the Regional Policy Statement would not be able to encourage, through policies and methods, the reduction of waste going to landfills. The alternative is increased waste generation and an increased need for more landfills with significant costs to the region and reduced environmental performance.

On this basis of the above, objective 11 is the most appropriate for achieving the purpose of the Resource Management Act.

3.4

Analysis of which are the most appropriate objectives

Final chosen objective	Other alternatives?	Why <u>not</u> the most appropriate to achieve the Resource Management Act
<p>Objective 9: The region's energy needs are met in ways that:</p> <ul style="list-style-type: none"> improve energy efficiency and conservation; diversify the type and scale of renewable energy development; maximise the use of renewable energy resources; reduce dependency on fossil fuels; and reduce greenhouse gas emissions from transportation. 	<p>Alternative 1: No objectives in the Regional Policy Statement to address energy</p> <p>Alternative 2: The objectives in the existing 1995 Regional Policy Statement on energy.</p> <p><i>Objective 1: Energy demand is moderated and energy that is needed is produced, distributed and used efficiently so as to reduce impacts on the environment and to make effective use of limited energy resources.</i></p> <p><i>Objective 2: An increased proportion of energy is provided by sources that are renewable.</i></p> <p><i>Objective 3: Adverse local and global environmental effects of energy production, transportation and transmission, conversion and end use are avoided remedied or mitigated.</i></p> <p>Alternative 3: The objective focuses on not only providing for the region's energy needs but also the national energy needs.</p>	<p>The Regional Policy Statement can contribute in a resource management context and address a range of energy issues. The issue is also assessed as being of regional significance. Alternative 1 therefore misses out on using the available mechanisms through the Resource Management Act.</p> <p>Measuring up (2005) and the Regional Policy Statement Evaluation Report on Energy (2006) assessed that there had been poor performance towards achieving the existing objectives in the Regional Policy Statement. The poor achievement of these objectives is attributed to the fact that the objectives address a range of matters that could not be managed or achieved through a regional policy statement. The re-use of the existing objectives (Alternative 2), therefore, is not appropriate.</p> <p>A Regional Policy Statement addresses the significant resource management issues for a region (section 62(1)(a)), not the nation. It is therefore not appropriate for a Regional Policy Statement to aim to address issues for the entire country.</p>
<p>Objective 10: The social, economic, cultural and environmental, benefits of regionally significant infrastructure are recognised and protected.</p>	<p>Alternative 1. No objectives in the Regional Policy Statement to address infrastructure</p> <p>Alternative 2. The objectives in the existing 1995 Regional Policy Statement on infrastructure (in the 'Built environment and transportation' chapter).</p> <p><i>Objective 1: Urban areas, the built environment and transportation systems are developed so that they, and their associated activities use resources efficiently and demand for finite resources is moderated.</i></p> <p><i>Objective 2: The adverse environmental effects that result from the use of urban areas, transportation systems and infrastructure are avoided remedied or mitigated and, in particular the, any adverse effects that result from the</i></p>	<p>The Regional Policy Statement can assist with addressing a range of infrastructure and land use issues. The issue is assessed as being of regional significance. Section 30(1)(gb) allocates a function to regional councils to provide strategic integration of infrastructure with land use through objectives, policies and methods. A regional policy statement is the mechanism in which this function is implemented. Alternative 1 therefore misses out on using the available mechanisms through the Resource Management Act and would mean that greater Wellington would not be carrying out its function in accordance with section 30(1)(gb).</p> <p>Measuring up (2005) and the Regional Policy Statement Evaluation Report on Built Environment and Transportation</p>

Final chosen objective	Other alternatives?	Why <u>not</u> the most appropriate to achieve the Resource Management Act
	<p><i>concentration and scale of activities in urban areas are recognised and provided for.</i></p> <p>Alternative 3. The objective focuses on not only providing for regionally significant infrastructure but all infrastructure or regionally <u>and</u> nationally significant infrastructure</p>	<p>(2006) assessed that there had been poor performance towards achieving the existing objectives in the Regional Policy Statement. The existing objectives do not provide strategic integration of infrastructure with land use (in accordance with section 30(1)(gb)). The objective 2 focuses on the management of adverse effects, which are already addressed by other topic objectives, e.g. freshwater, landscape, indigenous biodiversity. The focus of the existing objective 1 is on transportation rather than all infrastructures. Alternative 2, therefore, is not appropriate. By referring to all infrastructure, the objective would not provide strategic integration. All infrastructure and its benefits are not of regional significance. No information is available that provides information about what is considered nationally significant infrastructure. This can not be determined by a regional council at a local level. Such information needs to be assessed and provided through a national assessment. Alternative 3, therefore, is not appropriate.</p>
<p>Objective 11: The quantity of waste disposed of is reduced.</p>	<p>Alternative 1. No objectives in the Regional Policy Statement to address waste</p> <p>Alternative 2. The objectives in the existing 1995 Regional Policy Statement on waste.</p> <p><i>Objective 1: The quantity of waste generated is reduced.</i></p> <p><i>Objective 2: the quantity of residential wastes from disposal is minimised through reuse, recycling and resource recovery.</i></p> <p><i>Objective 3: Adverse effects on the environment and human health from the inappropriate disposal of residual liquid and solid wastes are avoided or, where this is not possible, remedied or mitigated.</i></p>	<p>The Regional Policy Statement can contribute, in a resource management context, and address certain aspects of waste management. The issue is also assessed as being of regional significance. Alternative 1 therefore misses out on using the available mechanisms through the Resource Management Act.</p> <p>Measuring up (2005) and the Regional Policy Statement Evaluation Report on Waste (2006) assessed that there had been some progress towards achieving the existing objectives in the Regional Policy Statement but that this was occurring because of statutory obligations imposed upon city and district councils by the Local Government Act 1974 and 2002. As an environmental outcome, existing objective 1 and its focus on 'generation' is not appropriate. Waste is anything that is not wanted. It is impossible to measure or target a reduction in generation. Lots of waste gets reused. Reducing the amount of waste disposed of is a more appropriate focus as this is the resource</p>

Final chosen objective	Other alternatives?	Why <u>not</u> the most appropriate to achieve the Resource Management Act
		<p>management issue of regional significance. Existing objective 2 is written as a direction rather than an environmental outcome. Existing objective 3 only deals with 'inappropriate disposal'. Adverse environmental effects, of regional significance, in the coastal environment, fresh water and the issue of contaminated land are addressed in other objectives in the Regional Policy Statement. Objective 3 is not necessary. Alternative 2 is therefore not appropriate.</p>

Table 1: Analysis of which are the most appropriate objectives

4. Evaluation of policies and methods to achieve objective 9

The appropriateness of the policies and methods to achieve objective 9 are evaluated by looking at the effectiveness and the efficiency of the policy and method options, and the risks of acting or not acting if there is uncertain or insufficient information.

4.1 The range of policy and methods options considered

Objective 9 seeks to meet the region's energy needs in ways that reduce greenhouse gas emissions from transportation, reduce dependency on fossil fuels, maximise the use of the region's renewable energy resources, diversify the type and scale of renewable energy development in the region, and improve the efficiency of energy use.

In addressing this objective, the primary focus is to determine the most appropriate way(s) to achieve the objective. That is, whether it can be best achieved through regulatory direction to plans, or through regulatory direction as to matters to be considered when making resource management decisions, or through non-regulatory programs, or by doing nothing.

4.1.1 Regulatory direction to district and/or regional plans and the Regional Land Transport Strategy

Option 1 – Direction to district and regional plans to provide for renewable energy projects in delineated locations

This option requires district and regional plans to provide for renewable energy within delineated locations. Alternatively the policy would require that renewable energy development does not occur in delineated areas with significant values (for example, outstanding landscapes, or significant biodiversity values).

Option 2 – Direction to district and regional plans to recognise the benefits of renewable energy

This option requires district and regional plans to recognise the benefits of renewable energy.

Option 3 – Direction to the Regional Land Transport Strategy and district plans to promote travel demand management

This option requires the Regional Land Transport Strategy and district plans to promote travel demand management.

Option 4 – Direction to the Regional Land Transport Strategy to reduce the consumption of non-renewable transport fuels and carbon dioxide emissions from transportation

This option requires the Regional Land Transport Strategy to support a reduction in the consumption of non-renewable transport fuels and carbon dioxide emissions from transportation.

Option 5 – Direction to district plans to promote energy efficient design and small scale renewable energy generation

This option requires district plans to promote energy efficient design, alterations and small scale renewable energy generation.

4.1.2 Regulatory direction as to matters to be given particular regard in resource management decision making

Option 6 – Consider renewable energy and adverse effects on significant values

This option requires local authorities to consider how they make decisions on renewable energy and provide direction on the key significant values to be considered alongside.

Option 7 – Consider the benefits of renewable energy

This option requires local authorities to have particular regard to the benefits of renewable energy.

Option 8 – Consider renewable energy resources of national significance within the region

This option requires local authorities to have particular regard to the nationally significant renewable energy resources within the region.

Option 9 – Consider the integration of land use and transportation

This option requires local authorities to have particular regard to a range of matters around the integration to land use and transportation to make progress towards the key outcomes in the Regional Land Transport Strategy.

4.1.3 Non-regulatory options

Option 10 – Information about energy efficient subdivision, design and building development

This option involves preparing information to assist with energy efficient subdivision, design and building development

Option 11 – Information about providing for walking, cycling and public transport as part of development

This option involves preparing information about how walking, cycling and public transport should be provided for when making decisions on subdivision and development.

Option 12 – Identify sustainable energy programmes

This option involves the identification of non-regulatory sustainable energy programmes, to improve energy efficiency and conservation, reduce carbon dioxide and minimise the region’s vulnerability to energy supply disruptions or shortages.

Option 13 – Assist the community to use energy efficiently

This option involves assisting the community to adopt sustainable practices and use energy efficiently.

4.1.4 Do nothing

Option 14 – No intervention

This option offers no intervention to meet the region’s energy needs in ways that reduce greenhouse gas emissions from transportation, reduce dependency on fossil fuels, maximise the use of the region’s renewable energy resources, diversify the type and scale of renewable energy development in the region and improve the efficiency of energy use.

4.2

Evaluation as to the effectiveness and efficiency of the policy and method options to achieve objective 9

Policy and method options	Analysis of effectiveness	Effectiveness Rating	BENEFITS (social, economic and environmental)	COSTS (social, economic and environmental)	Efficient?
Regulatory direction to district and/or regional plans					
Option 1 Direction to district and regional plans to provide for renewable energy projects in delineated locations	<p>Establishes a consistent policy framework within which to develop regulatory provisions and/or actions within plans; requires all pertinent plans to promote renewable energy in certain locations, or to avoid certain other locations.</p> <p>Sets out a clear direction for regulatory provisions, both in intent and in terms of the parameters considered relevant in further development of the planning framework.</p> <p>Results in a generalised, rather than site specific, assessment of appropriateness. This would reduce the possibility of renewable energy development in locations where further site specific assessments could find the site to be appropriate. It could also result in identification of locations for renewable energy development that on further specific assessment are not appropriate/viable.</p> <p>Promotes a level of certainty for individual applicants, the community of interested parties and for councils about where renewable energy should be provided for or where it ought not to be located.</p> <p>Promotes a more rapid, unimpeded and streamlined process, as resource management results can be anticipated or are able to be predicted.</p>	Med	<p>All relevant parties will work to achieve the 'energy' objective (9) which will improve social, economic and environmental outcomes for individuals and the community.</p> <p>Establishes a clear intent for regulatory interventions and assists local authorities in establishing local regulatory frameworks.</p> <p>Provides information for the community about the regional outcomes being sought in relation to the regions development of renewable energy.</p> <p>Reduces resources needed by applicant to interpret what is required and why, and to achieve compliance with the regulatory framework.</p>	<p>Requires a high level of certainty and therefore investigation and information as to the appropriate locations for renewable energy generation and about other significant values, and therefore significant costs are involved.</p> <p>Does not provide for a case-by-case assessment as to whether a particular proposal (weighing up all the range of benefits and effects in accordance with Part II of the Resource Management Act) will result in sustainable management of natural and physical resources.</p> <p>Could act as a disincentive or discouragement to innovation, which has potential to derive alternative solutions to regulatory intervention.</p> <p>Provisions would be overly simplified and lead to additional costs as proposals are seen as variants or exceptions.</p>	No

Policy and method options	Analysis of effectiveness	Effectiveness Rating	BENEFITS (social, economic and environmental)	COSTS (social, economic and environmental)	Efficient?
<p>Option 2 Direction to district and regional plans to recognise the benefits of renewable energy</p>	<p>Establishes a clear and consistent policy framework within which to develop regulatory provisions and/or actions within plans; requires all pertinent plans to recognise the benefits of renewable energy when developing policy and related actions (rules and/or methods). Promotes greater certainty for individual applicants, community of interested parties and for councils on what the benefits to the regions are. Increases the ability to critique provisions and rationale/s within plan making processes, and increases understanding of relevant benefits.</p>	<p>Med</p>	<p>Resource management decisions are still made on a case by case basis at the local level, but within a consistent policy framework across the region which describes the benefits to the region. Establishes a clear intent – this assists local authorities in establishing local regulatory frameworks. Provides information for the community about what the benefits from renewable energy are considered to be and helps to expedite the statutory processes. The direction is targeted and clearly attributed to a regionally significant issue – helping to reduce time, money and other resources on process. Less conflict, debate or contesting of the advantages and disadvantages of particular proposals or planning responses, as like or similar proposals are able to be categorised and the likely resource management responses are indicated generally, which helps to reduce conflict.</p>	<p>On-going implementation costs for councils – to implement, to monitor compliance, to take enforcement action, to monitor delivery and environmental outcomes to enable an evaluation of the effectiveness of the intervention. The cause-effect relationship is direct and clear and the costs of any remedy are able to be attached directly to specific activities.</p>	<p>Yes</p>

Policy and method options	Analysis of effectiveness	Effectiveness Rating	BENEFITS (social, economic and environmental)	COSTS (social, economic and environmental)	Efficient?
<p>Option 3 Direction to the Regional Land Transport Strategy and district plans to promote travel demand management</p>	<p>Establishes a consistent policy framework across resource management plans and the Regional Land Transport Strategy; requiring them all to promote shared policy outcomes around travel demand management. Promotes a level of general certainty for individual applicants, community of interested parties, and for councils on travel demand management as an approach.</p>	<p>Med</p>	<p>Increased clarity as to what are the prompts or triggers for regulatory intervention, and of the likely planning responses, provides greater transparency within the process. The direction is targeted and clearly attributed to a regionally significant issue – helping to reduce time, money and other resources on process. All relevant parties work to manage travel demand which will improve social, economic and environmental outcomes for individuals and the community. Provides information for the community about all the regional outcomes being sought in relation to the region's 'travel management', through both resource management frameworks and the transport management strategy and policy.</p>	<p>There are human and economic resource costs associated with research, analysis, interpretation, consultation, governance and decision making processes to formulate and establish the a response within the Regional Land Transport Strategy and district plans to ensure these are consistent with the Regional Policy Statement. On-going costs for implementation and monitoring delivery and environmental outcomes to enable an evaluation of the effectiveness. Transport and resource management decisions are informed about the significant issues for the region and the need to manage travel demand.</p>	<p>Yes</p>
<p>Option 4 Direction to the Regional Land Transport Strategy to reduce the consumption of non-renewable transport fuels and carbon dioxide emissions from transportation</p>	<p>Sets out a clear direction in terms of parameters to be considered relevant in the regional transport planning framework in order not to be inconsistent with the Regional Policy Statement. Promotes a level of certainty for individual applicants, community of interested parties, and for councils on the management of transportation to reduce the consumption of non-renewable transport fuels and carbon dioxide emissions.</p>	<p>Med</p>	<p>Relevant parties work to achieve the 'energy' objective (9) which will improve social, economic and environmental outcomes for individuals and the community. Increases security, as will reduce reliance on non-renewable transport fuels. Enhances the region's ability to reduce its contribution to carbon dioxide emissions. The direction is targeted and clearly attributed to a</p>	<p>There are human and economic resource costs associated with research, analysis, interpretation, consultation, governance and decision making processes to formulate and establish the transport strategy to be consistent with the policy. On-going implementation costs for implementation and monitoring delivery and environmental outcomes to enable an evaluation</p>	<p>Yes</p>

Policy and method options	Analysis of effectiveness	Effectiveness Rating	BENEFITS (social, economic and environmental)	COSTS (social, economic and environmental)	Efficient?
			<p>regionally significant issue – helping to reduce time, money and other resources on process.</p> <p>Provides information for community about all the regional outcomes being sought in relation to transportation and concern about its contribution to the consumption of non-renewable transport fuels and the emission of carbon dioxide.</p>	<p>of the effectiveness.</p> <p>Transport decisions are informed about the significant of the issue for the region, which may bring additional cost in searching for and implementing alternatives or solutions.</p>	
<p>Option 5</p> <p>Direction to district plans to promote energy efficient design and small scale renewable energy generation</p>	<p>Establishes a consistent policy framework within which to develop regulatory provisions and/or actions within plans; requires all pertinent plans to recognise when developing policy and related actions (rules and/or methods) to promote energy efficient design and small scale renewable energy generation.</p> <p>Promotes greater certainty for individual applicants, community of interested parties, and for councils on promotion of energy efficient design and small scale renewable energy generation.</p>	High	<p>Resource management decisions are still made on a case by case basis at the local level, but within a consistent policy framework across the region which promotes energy efficient design and small scale renewable energy generation. Establishes a clear intent – this assists local authorities in establishing local regulatory frameworks.</p> <p>Provides information for community about the regional significance of promoting energy efficient design and small scale renewable energy generation and helps to expedite the statutory processes.</p> <p>Such 'promotion' through plans will remove potential and/or perceived barriers to good/better design, which add cost and or contribute to lost opportunities for better design and uptake of small scale renewable energy generation. The direction is targeted and clearly attributed to the regionally significant issue – helping</p>	<p>There are human and economic resource costs for councils and communities, associated with research, analysis, interpretation, consultation, governance and decision making processes to formulate and establish the consequent regulatory frameworks for the selected themes, which must implement the policy.</p> <p>On-going implementation costs for councils – to implement, to monitor compliance, to take enforcement action, to monitor delivery and environmental outcomes to enable an evaluation of the effectiveness of the intervention.</p> <p>The cause-effect relationship is direct and clear and the costs of any remedy are able to be attached directly to specific activities.</p>	Yes

Policy and method options	Analysis of effectiveness	Effectiveness Rating	BENEFITS (social, economic and environmental)	COSTS (social, economic and environmental)	Efficient?
			<p>to reduce time, money and other resources on process.</p> <p>Less conflict, debate or contesting of the advantages and disadvantages of particular planning responses or proposals, as like or similar proposals are able to be categorised and the likely resource management responses are indicated generally, which helps to reduce conflict.</p>		
Regulatory direction as to matters to be given particular regard in resource management decision making					
<p>Option 6</p> <p>Consider renewable energy and adverse effects on significant values</p>	<p>Sets out direction on the significance of renewable energy generation for the region, both in intent and in terms of the parameters needing to be considered and also the significant values to be considered. However, the significant values are covered by other topic policies in the Regional Policy Statement and the direction in these policies could be undermined by this generic policy approach.</p> <p>Will result in confusion about relevant policies across the Regional Policy Statement and which ones should be applied or might take priority.</p> <p>Provides an ability to critique what is considered important and relevant within decision making processes, and thus increase understanding of pertinent factors and intent. Transparent as to how these matters are to be treated in decision making. Improves understanding and enhances equity within resource</p>	<p>Low</p>	<p>Provides a consistent framework with regard to 'considerations' across the region.</p> <p>Allows some discretion and thus variation in interpretation and implementation. The management responses can be adapted to the specific proposal under consideration.</p> <p>While certain triggers or prompts demand certain considerations must be made, the responses or action that results is less certain than specific direction as to matters to be addressed by plans.</p> <p>The resource management response is less predictable or formulaic as might be anticipated under the earlier direction to district plans options, as decision makers exercise discretion in how they respond to considerations. This option allows for greater variance within the management response, to the</p>	<p>While clarifying the matters for consideration, specifying the full extent of matters may not lead to simplicity or certainty. Rather, it may add to complexity.</p> <p>Costs will be borne by some proposals as a result of their activity status as an application for resource consent, and the matters around which discretion and/or control are reserved.</p> <p>Costs will be borne by councils as they must secure sufficient information pertinent to undertaking the required considerations, within decision making processes.</p> <p>Lead to duplication or conflicting requirements when consider the policy alongside other policies on significant values within the Regional Policy Statement – resulting in additional costs.</p>	<p>No</p>

Policy and method options	Analysis of effectiveness	Effectiveness Rating	BENEFITS (social, economic and environmental)	COSTS (social, economic and environmental)	Efficient?
	<p>management activity.</p> <p>The intervention may only be triggered for certain resource consent applications (where discretion is retained over such issues), which means a different set of benefits and costs to those arising from application at the plan making stage.</p>		<p>triggers presented within a proposal.</p>		
<p>Option 7</p> <p>Consider the benefits of renewable energy</p>	<p>Sets out direction on the significance of renewable energy generation for the region, both in intent and in terms of the benefits needing to be considered.</p> <p>Provides an ability to critique what is considered important and relevant within decision making processes, and thus increase understanding of pertinent factors and intent. Transparent as to how these matters are to be treated in decision making. Improves understanding and enhances equity within resource management activity.</p> <p>The intervention may only be triggered for certain resource consent applications (where discretion is retained over such issues), which means a different set of benefits and costs to those arising from application at the plan making stage.</p>	<p>Low</p>	<p>Provides a consistent framework with regard to 'considerations' across the region.</p> <p>Allows some discretion and thus variation in interpretation and implementation. The management responses can be adapted to the specific proposal under consideration.</p> <p>While certain triggers or prompts demand certain considerations must be made, the responses or action that results is less certain than specific direction as to matters to be addressed by plans.</p> <p>The resource management response is less predictable or formulaic as might be anticipated under the earlier direction to district plans options, as decision makers exercise discretion in how they respond to considerations. This option allows for greater variance within the management response, to the triggers presented within a proposal.</p>	<p>Costs will be borne by some proposals as a result of their activity status as an application for resource consent, and the matters around which discretion and/or control are reserved.</p> <p>Costs will be borne by councils as they must secure sufficient information pertinent to undertaking the required considerations, within decision making processes.</p> <p>Flexibility carries some costs, as it might be thought necessary to treat each application as unique, rather than allowing a standardised response to develop.</p>	<p>Yes</p>

Policy and method options	Analysis of effectiveness	Effectiveness Rating	BENEFITS (social, economic and environmental)	COSTS (social, economic and environmental)	Efficient?
<p>Option 8</p> <p>Consider renewable energy resources of national significance within the region</p>	<p>Sets out direction on the national significance of wind and marine renewable energy resources in the region.</p> <p>Provides an ability to critique what is considered important and relevant within decision making processes, and thus increase understanding of pertinent factors and intent. Transparent as to how these matters are to be treated in decision making. Improves understanding and enhances equity within resource management activity.</p> <p>The intervention may only be triggered for certain resource consent applications (where discretion is retained over such issues), which means a different set of benefits and costs to those arising from application at the plan making stage.</p>	<p>Med</p>	<p>Provides a consistent framework with regard to 'considerations' across the region.</p> <p>Allows some discretion and thus variation in interpretation and implementation. The management responses can be adapted to the specific proposal under consideration.</p> <p>While certain triggers or prompts demand certain considerations must be made, the responses or action that results is less certain than specific direction as to matters to be addressed by plans.</p> <p>The resource management response is less predictable or formulaic as might be anticipated under the earlier direction to district plans options, as decision makers exercise discretion in how they respond to considerations. This option allows for greater variance within the management response, to the triggers presented within a proposal.</p>	<p>Costs will be borne by some proposals as a result of their activity status as an application for resource consent, and the matters around which discretion and/or control are reserved.</p> <p>Costs will be borne by councils as they must secure sufficient information pertinent to undertaking the required considerations, within decision making processes.</p> <p>Flexibility carries some costs, as it might be thought necessary to treat each application as unique, rather than allowing a standardised response to develop.</p>	<p>Yes</p>
<p>Option 9</p> <p>Consider the integration of land use and transportation</p>	<p>Sets out direction on the need to consider integration of land use with transportation and the outcomes sought to be achieved for the region's transportation network.</p> <p>Provides an ability to critique what is considered important and relevant within decision making processes, and thus increase understanding of pertinent factors and intent. Transparent as to how these matters are to be treated in decision making. Improves understanding and</p>	<p>Med</p>	<p>Provides a consistent framework with regard to 'considerations' across the region.</p> <p>Allows some discretion and thus variation in interpretation and implementation. The management responses can be adapted to the specific proposal under consideration.</p> <p>While certain triggers or prompts demand certain considerations must</p>	<p>While clarifying the matters for consideration, specifying the full extent of matters may not lead to simplicity or certainty. Rather, it may add to complexity.</p> <p>Costs will be borne by some proposals as a result of their activity status as an application for resource consent, and the matters around which discretion and/or</p>	<p>Yes</p>

Policy and method options	Analysis of effectiveness	Effectiveness Rating	BENEFITS (social, economic and environmental)	COSTS (social, economic and environmental)	Efficient?
	<p>enhances equity within resource management activity.</p> <p>The intervention may only be triggered for certain resource consent applications (where discretion is retained over such issues), which means a different set of benefits and costs to those arising from application at the plan making stage.</p>		<p>be made, the responses or action that results is less certain than specific direction as to matters to be addressed by plans.</p> <p>The resource management response is less predictable or formulaic as might be anticipated under the earlier direction to district plans options, as decision makers exercise discretion in how they respond to considerations. This option allows for greater variance within the management response, to the triggers presented within a proposal.</p>	<p>control are reserved.</p> <p>Costs will be borne by councils as they are must secure sufficient information pertinent to undertaking the required considerations, within decision making processes.</p> <p>May demand more information and investigation than absolutely necessary.</p> <p>Flexibility carries some costs, as it might be thought necessary to treat each application as unique, rather than allowing a standardised response to develop.</p>	
Non-regulatory options					
<p>Option 10</p> <p>Information about energy efficient subdivision, design and building development</p>	<p>Sets out the information considered relevant and pertinent, and would provide guidance for interpretation and implementation of the policy framework or the method, or more simply 'good practice', to achieve the objective and to address the issue. However, the response to this information is entirely discretionary and voluntary by the recipient, so there is considerable variance as to what it will mean in practice.</p> <p>Could be effective if all relevant local authorities commit to doing them.</p> <p>Actions may not get appropriately resourced.</p> <p>Changes to information can be easily undertaken as needed.</p>	Low	<p>Allows for flexibility of approach rather than imposition of regulatory policies.</p> <p>Recognises that people can "do the right thing" without compulsion.</p> <p>Economically efficient of financial support stimulates private effort and commitment.</p> <p>Supplements a new area of regulatory activity, to compel more efficient building and design, by supporting people in making informed choices, as considerable discretion may continue to be had in responding to regulatory requirements.</p>	<p>Cost to local authorities of developing and providing appropriate information and material for public and building industry education programmes.</p> <p>Potential environmental costs because of a lesser commitment to get things done.</p>	Yes

Policy and method options	Analysis of effectiveness	Effectiveness Rating	BENEFITS (social, economic and environmental)	COSTS (social, economic and environmental)	Efficient?
<p>Option 11 Information about providing for walking, cycling and public transport as part of development</p>	<p>The intervention is likely to be applied at a generic and/or generalised scale across all issues/themes.</p> <p>Could be effective if all relevant local authorities commit to doing them.</p> <p>Actions may not get appropriately resourced.</p> <p>Sets out the information considered relevant and pertinent, and would provide guidance for interpretation and implementation of the policy framework or the method, or more simply 'good practice', to achieve the objective and/or to address the issue. However, the response to this information is entirely discretionary and voluntary by the recipient, so there is considerable variance as to what it will mean in practice.</p>	<p>Low</p>	<p>Allows for flexibility of approach rather than imposition of regulatory policies.</p> <p>Recognises that people can "do the right thing" without compulsion.</p> <p>Economically efficient of financial support stimulates private effort and commitment.</p> <p>Supplements regulatory approaches, and aids implementation (for example, integrating land use and transportation).</p>	<p>Cost to local authorities of providing appropriate information and material for public education programmes.</p> <p>Potential environmental costs because of a lesser commitment to get things done.</p>	<p>Yes</p>
<p>Option 12 Identify sustainable energy programmes</p>	<p>Provides opportunity to look at what programmes are most appropriately supported by local government, alongside other similar programmes.</p> <p>Changes to programmes can be easily undertaken as needed.</p> <p>Could be effective if all relevant local authorities commit to doing them.</p> <p>Actions may not get appropriately resourced.</p>	<p>Med</p>	<p>Allows for flexibility of approach rather than imposition of regulatory policies.</p> <p>Recognises that people can "do the right thing" without compulsion.</p> <p>Economically efficient of financial support stimulates private effort and commitment.</p> <p>Supplements regulatory approaches, and aids implementation (for example, promoting renewable energy).</p>	<p>Cost to local authorities of providing appropriate information and material for public education programmes.</p> <p>Potential environmental costs because of a lesser commitment to get things done.</p>	<p>Yes</p>

Policy and method options	Analysis of effectiveness	Effectiveness Rating	BENEFITS (social, economic and environmental)	COSTS (social, economic and environmental)	Efficient?
Option 13 Assist the community to use energy efficiently	Provides the community with information on how to use energy efficiently. Could be effective if all relevant local authorities commit to doing them. Actions may not get appropriately resourced.	Med	Allows for flexibility of approach rather than imposition of regulatory policies. Recognises that people can “do the right thing” without compulsion. Economically efficient of financial support stimulates private effort and commitment. Implementation of energy conservation measures by the community will reduce demand for electricity	Cost to local authorities of providing appropriate information and material for public education programmes. Could lead to protracted negotiations and potentially poor results. Potential environmental costs because of a lesser commitment to get things done.	Yes
Doing Nothing					
Option 14 No intervention	This is not effective in resource management terms. Nor could it be argued to be efficient, given the issue continues unabated, and presumably would get worse. As the issue has been found to be regionally significant (refer to criteria in Appendix 1) – this would be a dereliction of function and duty under the Resource Management Act.	Low	Local authorities are able to work with their communities to identify on a case-by-case basis what types of intervention is required – without a predetermined regional policy direction.	The issues will continue in the same trend or pattern, and that the objective will not be achieved. Doing nothing will not achieve the purpose of the Resource Management Act. This is not effective resource management given the issue continues without regional direction. It would lead to continued unsustainable environmental outcomes, including economic, social and cultural outcomes.	No

Table 2: Evaluation as to the effectiveness and efficiency of policy and method options to achieve objective 9

4.3 Results of the evaluation as to the most appropriate policy and method options to achieve objective 9

Policy and method options	Effectiveness	Efficient?	Selected option(s)	Proposed policies and methods
Regulatory direction to district and/or regional plans				
Option 1 Direction to district and regional plans to provide for renewable energy projects in delineated locations	Low	No	X	
Option 2 Direction to district and regional plans to recognise the benefits of renewable energy	Med	Yes	✓	Policy 6 and Methods 1 and 2
Option 3 Direction to the Regional Land Transport Strategy and district plans to promote travel demand management	Med	Yes	✓	Policy 9 and Methods 1 and 3
Option 4 Direction to the Regional Land Transport Strategy to reduce the consumption of non-renewable transport fuels and carbon dioxide emissions from transportation	Med	Yes	✓	Policy 8 and Method 3
Option 5 Direction to district plans to promote energy efficient design and small scale renewable energy generation	Med	Yes	✓	Policy 10 and Method 1
Regulatory direction as to matters to be given particular regard in resource management decision making				
Option 6 Consider renewable energy and adverse effects on significant values	Low	No	X	
Option 7 Consider the benefits of renewable energy	Low	Yes	✓	Policy 38(a) and Method 4
Option 8 Consider renewable energy resources of national significance within the region	Med	Yes	✓	Policy 38(b) and Method 4
Option 9 Consider the integration of land use and transportation	Med	Yes	✓	Policy 56 and Method 4
Non-regulatory options				
Option 10 Information about energy efficient subdivision, design and building	Low	Yes	✓	Method 10

Policy and method options	Effectiveness	Efficient?	Selected option(s)	Proposed policies and methods
development				
Option 11 Information about providing for walking, cycling and public transport as part of development	Low	Yes	✓	Method 25
Option 12 Identify sustainable energy programmes	Med	Yes	✓	Method 32
Option 13 Assist the community to use energy efficiently	Med	Yes	✓	Method 55
Doing Nothing				
Option 14 No intervention	Low	No	X	

Table 3: Results of the evaluation as to the most appropriate of policy and method options to achieve objective 9

4.4 Discussion of selected options

A range of targeted policies directing both district and regional plans, along with the Regional Land Transport Strategy are appropriate to achieve objective 9 and address Issue 1 on energy. The range includes requiring that district and regional plans recognise the benefits of renewable energy - option 2 (policy 6), promote travel demand management - option 2 (policy 9), and promote energy efficient design and small scale renewable energy generation - option 5 (policy 10). It also includes requiring the Regional Land Transport Strategy, which is required to be ‘not inconsistent with a regional policy statement’, to promote travel demand management - option 2 (policy 9) and to reduce the consumption of non-renewable transport fuels and carbon dioxide emissions from transportation – option 4 (policy 8).

These options are considered appropriate as they provide clear direction on the matters to be provided for and promoted, in a resource management sense, to achieve objective 9 in response to the energy issue.

Option 1 ‘Direction to regional and district plans to provide for renewable energy projects in delineated location’ was not considered appropriate. There is currently insufficient ‘consistent’ information across the Wellington region about significant values - such as outstanding landscapes, and indigenous ecosystems and habitats with significant biodiversity values - in which to make an assessment of specific locations where renewable energy generation projects should occur, or ought not to be allowed to occur. In addition, although the region has some general information about its wind and marine potential, it is not appropriate to specify these location as suitable for renewable energy generation (and thereby restrict from other locations) as there is insufficient information about site specific feasibility and constraints.

In addition to the selected options above, that direct district and regional plans or the Regional Land Transport Strategy, three policy options - which need 'to be given particular regard' when making resource management decisions - are also considered appropriate. Option 7 (policy 38), is less effective than option 2 (policy 6), however, until such time as option 2 is put in place in all district and regional plans, option 7 is appropriate as an interim direction. Once option 2 has been put in place it is proposed that clause (a) of policy 38 shall cease to have effect. Option 8 is considered appropriate as it provides clarification about the significance on wind and marine energy resources in the Wellington region and the need for generation activities to locate where such resources exist. Clause (b) to policy 38 (option 8) is therefore proposed to continue to have effect. The national significance of wind and marine renewable energy resources within the Wellington region are identified in two reports. These reports are 'Marine Energy – Development of Marine Energy in New Zealand with particular reference to the Greater Wellington Region Case Study by Power Projects Ltd, June 2008' and, 'Wind Energy – Estimation of Wind Speed in the Greater Wellington Region, NIWA, January, 2008'. Option 9 (policy 56) is shared with the topic of 'Regional form, design and function' and is also appropriate to achieve objective 9 and reduce dependency on fossil fuels and greenhouse gas emission from transportation.

Option 6 is not appropriate. The objectives, policies and methods across the Regional Policy Statement are intended to be read together. Other objectives and policies – such as those for landscape, the coastal environment and indigenous ecosystems - need to be considered alongside the policies on the benefits of renewable energy development. Option 6 seeks that a policy be developed which outlines the key environmental values/constraints that should be considered alongside the benefits of such development. Such a policy was considered inappropriate as it would create duplication and confusion about which policies apply in what situations.

A range of non-regulatory actions are also considered appropriate to support the implementation of the regulatory directions. In particular, option 10 (Method 10) 'Information about energy efficient subdivision, design and building development' supports the implementation of option 5 (Policy 10) and option 11 (method 25) 'Information about providing for walking, cycling and public transport as part of development supports the implementation of option 9 (policy 56). Options 12 (method 32) and 13 (method 55) are necessary and appropriate to respond to clauses (a) of the energy issue and improve energy efficiency and conservation. This is not addressed by the other options selected.

Doing nothing is not considered appropriate as it would not achieve objective 9 or address the energy issue. The Wellington region is dependant on externally generated electricity and overseas-sourced fossil fuels and is therefore vulnerable to energy disruptions and shortages. Significant renewable energy resources exist within the region.

4.5 Risk of acting or not acting if information is uncertain or insufficient

Section 32(4)(b) of the Resource Management Act requires the evaluation of appropriateness to take into account the risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the policies or methods.

With regard to energy there is insufficient information about renewable energy development potential and the environmental values which act as/constraints at site specific locations in order to progress with option 1. The risk of not including option 1 is not high, as the other options and resulting policies provide a clear policy framework in which to consider the benefits of renewable energy alongside environmental constraints/values described in other policies in accordance with Part II of the Resource Management Act.

5. Evaluation of policies and methods to achieve objective 10

The appropriateness of the policies and methods to achieve objective 10 are evaluated by looking at the effectiveness and the efficiency of the policy and method options and the risks of acting or not acting if there is uncertain or insufficient information.

5.1 The range of policy and method options to achieve objective 10

Objective 10 seeks to recognise and protect the social, economic, cultural and environmental benefits of regionally significant infrastructure.

In addressing this objective, the primary focus is to determine whether it can be best achieved through regulatory direction to plans or through regulatory direction as to matters to be considered when making resource management decisions, or through non-regulatory programs, or by doing nothing.

5.1.1 Regulatory direction to district and/or regional plans and the Regional Land Transport Strategy

Option 1 – Direction to district and regional plans to recognise the benefits of regionally significant infrastructure

This option requires district and regional plans to recognise the benefits of regionally significant infrastructure.

Option 2 - Direction to district and regional plans to protect regionally significant infrastructure

This option requires district and regional plans to protect regionally significant infrastructure from incompatible new land uses or activities under, over, or alongside.

5.1.2 Regulatory direction as to matters to be given particular regard in resource management decision making

Option 3 – Consider regionally significant infrastructure and adverse effects on significant values

This option requires local authorities to consider how they make decisions on regionally significant infrastructure and provide direction on the key significant values to be considered alongside

Option 4 – Consider the benefits of regionally significant infrastructure

This option requires local authorities to have particular regard to the benefits of regionally significant infrastructure.

5.1.3 Non-regulatory options

Option 5 – Information about regionally significant infrastructure

This option involves preparing information about regionally significant infrastructure.

5.1.4 Do nothing

Option 6 – No intervention

This option offers no intervention to recognise and protect the social, economic, cultural and environmental benefits of regionally significant infrastructure.

5.2

Evaluation as to the effectiveness and efficiency of the policy and method options to achieve objective 10

Policy and method options	Analysis of effectiveness	Effectiveness Rating	BENEFITS (social, economic and environmental)	COSTS (social, economic and environmental)	Efficient?
Regulatory direction to district and/or regional plans					
<p>Option 1 Direction to district and regional plans to recognise the benefits of regionally significant infrastructure</p>	<p>Establishes a clear and consistent policy framework within which to develop regulatory provisions and/or actions within plans; requires all pertinent plans to recognise the benefits of regionally significant infrastructure when developing policy and related actions (rules and/or methods). Provides certainty as to what is considered regionally significant infrastructure and its benefits to the region. Promotes greater certainty for individual applicants, the community of interested parties, and for councils about what the benefits to the regions are. Increases the ability to critique provisions and rationale/s within plan making processes, and increases understanding of relevant benefits.</p>	Med	<p>Resource management decisions are still made on a case by case basis at the local level, but within a consistent policy framework across the region which describes the benefits to the region. Establishes a clear intent – this assists local authorities in establishing local regulatory frameworks. Provides information for the community about what the benefits from regionally significant infrastructure are, and helps to expedite the statutory processes. The direction is targeted and clearly attributed to a regionally significant issue – helping to reduce time, money and other resources on process. Less conflict, debate or contesting of the advantages and disadvantages of particular planning responses or proposals, as like or similar proposals are able to be categorised and the likely resource management responses are indicated generally, which helps to reduce conflict.</p>	<p>On-going implementation costs for councils – to implement, to monitor compliance, to take enforcement action, to monitor delivery and environmental outcomes to enable an evaluation of the effectiveness of the intervention. The cause-effect relationship is direct and clear and the costs of any remedy are able to be attached directly to specific activities.</p>	Yes
<p>Option 2 Direction to district and regional plans</p>	<p>Establishes a clear and consistent policy framework within which to develop regulatory provisions and/or actions within plans; requires all</p>	Med	<p>Resource management decisions are still made on a case by case basis at the local level, but within a consistent policy framework across</p>	<p>There are human and economic resource costs for councils and communities, associated with research, analysis, interpretation, consultation, governance</p>	

Policy and method options	Analysis of effectiveness	Effectiveness Rating	BENEFITS (social, economic and environmental)	COSTS (social, economic and environmental)	Efficient?
to protect regionally significant infrastructure	<p>pertinent plans to recognise when developing policy and related actions (rules and/or methods) the need to protect regionally significant infrastructure from incompatible land use activities under, over, or alongside.</p> <p>Provide certainty that regionally significant infrastructure is to be protected from incompatible land uses.</p> <p>Promotes greater certainty for individual applicants, community of interested parties, and for councils on what the benefits to the regions are considered to be.</p> <p>Increases the ability to critique provisions and rationale/s within plan making processes, and increases understanding of the need to protect regionally significant.</p>		<p>the region which describes the need to protect regionally significant infrastructure from incompatible land uses.</p> <p>Establishes a clear intent – this assists local authorities in establishing local regulatory frameworks.</p> <p>Provides information for community about what needs to be protected and helps to expedite the statutory processes.</p> <p>The direction is targeted and clearly attributed to a regionally significant issue – helping to reduce time, money and other resources on process.</p> <p>Less conflict, debate or contesting of the advantages and disadvantages of particular planning responses or proposals, as like or similar proposals are able to be categorised and the likely resource management responses are indicated generally, which helps to reduce conflict.</p>	<p>and decision making processes to formulate and establish the consequent regulatory frameworks for the selected themes, which must implement the policy.</p> <p>On-going implementation costs for councils – to implement, to monitor compliance, to take enforcement action, to monitor delivery and environmental outcomes to enable an evaluation of the effectiveness of the intervention.</p> <p>The cause-effect relationship is direct and clear and the costs of any remedy are able to be attached directly to specific activities.</p>	
Regulatory direction as to matters to be given particular regard in resource management decision making					
Option 3 Consider renewable energy and adverse effects on significant values	Sets out direction on the significance of regionally significant infrastructure for the region, both in intent and in terms of the parameters needing to be considered and also the significant values to be considered. However, the significant values are covered by other topic policies in the Regional Policy Statement and the direction in these	Low	<p>Provides a consistent framework with regard to 'considerations' across the region.</p> <p>Allows some discretion and thus variation in interpretation and implementation. The management responses can be adapted to the specific proposal under</p>	<p>While clarifying the matters for consideration, specifying the full extent of matters may not lead to simplicity or certainty. Rather, it may add to complexity.</p> <p>Costs will be borne by some proposals as a result of their activity status as an application for resource consent, and the matters around which discretion and/or</p>	No

Policy and method options	Analysis of effectiveness	Effectiveness Rating	BENEFITS (social, economic and environmental)	COSTS (social, economic and environmental)	Efficient?
	<p>policies could be undermined by this more generic policy approach.</p> <p>Will result in confusion about relevant policies across the Regional Policy Statement and what ones should be applied.</p> <p>Provides an ability to critique what is considered important and relevant within decision making processes, and thus increase understanding of pertinent factors and intent.</p> <p>Transparent as to how these matters are to be treated in decision making.</p> <p>Improves understanding and enhances equity within resource management activity.</p> <p>The intervention may only be triggered for certain resource consent applications (where discretion is retained over such issues), which means a different set of benefits and costs to those arising from application at the plan making stage.</p>		<p>consideration.</p> <p>While certain triggers or prompts demand certain considerations must be made, the responses or action that results is less certain than specific direction as to matters to be addressed by plans.</p> <p>The resource management response is less predictable or formulaic as might be anticipated under the earlier direction to district plans options, as decision makers exercise discretion in how they respond to considerations. This option allows for greater variance within the management response, to the triggers presented within a proposal.</p>	<p>control are reserved.</p> <p>Costs will be borne by councils as they must secure sufficient information pertinent to undertaking the required considerations, within decision making processes.</p> <p>Lead to duplication or conflicting requirements when consider the policy alongside other policies on significant values in the Regional Policy Statement – resulting in unnecessary additional costs.</p>	
<p>Option 4</p> <p>Consider the benefits of regionally significant infrastructure</p>	<p>Sets out direction on the significance of regionally significant infrastructure for the region, both in intent and in terms of the benefits needing to be considered.</p> <p>Provides an ability to critique what is considered important and relevant within decision making processes, and thus increase understanding of pertinent factors and intent.</p> <p>Transparent as to how these matters are to be treated in decision making.</p> <p>Improves understanding and enhances</p>	<p>Low</p>	<p>Provides a consistent framework with regard to 'considerations' across the region.</p> <p>Allows some discretion and thus variation in interpretation and implementation. The management responses can be adapted to the specific proposal under consideration.</p> <p>While certain triggers or prompts demand certain considerations must be made, the responses or action</p>	<p>Costs will be borne by some proposals as a result of their activity status as an application for resource consent, and the matters around which discretion and/or control are reserved.</p> <p>Costs will be borne by councils as they must secure sufficient information pertinent to undertaking the required considerations, within decision making processes.</p> <p>Flexibility carries some costs, as it might be thought necessary to treat each</p>	<p>Yes</p>

Policy and method options	Analysis of effectiveness	Effectiveness Rating	BENEFITS (social, economic and environmental)	COSTS (social, economic and environmental)	Efficient?
	<p>equity within resource management activity.</p> <p>The intervention may only be triggered for certain resource consent applications (where discretion is retained over such issues), which means a different set of benefits and costs to those arising from application at the plan making stage.</p>		<p>that results is less certain than specific direction as to matters to be addressed by plans.</p> <p>The resource management response is less predictable or formulaic as might be anticipated under the earlier direction to district plans options, as decision makers exercise discretion in how they respond to considerations. This option allows for greater variance within the management response, to the triggers presented within a proposal.</p>	<p>application as unique, rather than allowing a standardised response to develop.</p>	
Non-regulatory options					
Option 5 Information about regionally significant infrastructure	<p>Actions may not get appropriately resourced.</p> <p>Sets out the information considered relevant and pertinent, and would provide guidance for interpretation and implementation of the policy framework. However, the response to this information is entirely discretionary and voluntary by the recipient, so there is considerable variance as to what it will mean in practice.</p> <p>The information would have no statutory weight and would therefore be of little assistance in implementing options 2 and 4.</p>	Low	<p>Improves understanding about the generic benefits associated with regionally significant infrastructure, and about what exactly is regionally significant infrastructure.</p> <p>Allows for flexibility of approach rather than imposition of regulatory policies.</p> <p>Economically efficient if the information provided is utilised effectively within regulatory processes</p>	<p>Could lead to protracted negotiations and potentially poor results, if there is continuing debate about the point of difference between regionally significant and nationally significant infrastructure, and consequently also, about potentially significant infrastructure for a district or local community. Considerable cost to identify the actual benefits associated with specific 'regionally significant infrastructure', for potentially limited benefit if the information is generated in an absence of context as to any proposal or planning provisions whereby information about the benefits ought to be considered.</p>	No
Doing Nothing					
Option 6	This is not effective in resource management terms. Nor could it be	Low	Local authorities are able to work with their communities to identify on	The issues will continue in the same trend or pattern, and that the objective will not	No

Policy and method options	Analysis of effectiveness	Effectiveness Rating	BENEFITS (social, economic and environmental)	COSTS (social, economic and environmental)	Efficient?
No intervention	<p>argued to be efficient, given the issue continues unabated, and presumably would get worse.</p> <p>As the issue has been found to be regionally significant (refer to criteria in Appendix 1) – this would be a dereliction of function and duty under the Resource Management Act.</p>		<p>a case-by-case basis what types of intervention is required – without a predetermined regional policy direction.</p>	<p>be achieved. Doing nothing will not achieve the purpose of the Resource Management Act.</p> <p>This is not effective resource management given the issue continues without regional direction lead to continued unsustainable environmental outcomes, including economic, social and cultural outcomes.</p>	

Table 4: Evaluation as to the effectiveness and efficiency of the policy and method options to achieve objective 10

5.3 Results of evaluation as to the most appropriate policy and method options to achieve objective 10

Policy and method options	Effectiveness	Efficient?	Selected option(s)	Proposed policies and methods
Regulatory direction to district and/or regional plans				
Option 1 Direction to district and regional plans to recognise the benefits of regionally significant infrastructure	Med	Yes	✓	Policy 6 and methods 1 and 2
Option 2 Direction to district and regional plans to protect regionally significant infrastructure	Med	Yes	✓	Policy 7 and methods 1 and 2
Regulatory direction as to matters to be given particular regard in resource management decision making				
Option 3 Consider renewable energy and adverse effects on significant values	Low	No	X	
Option 4 Consider the benefits of regionally significant infrastructure	Low	Yes	✓	Policy 38 and method 4
Non-regulatory options				
Option 5 Information about regionally significant infrastructure	Low	No	X	
Doing Nothing				
Option 6 No intervention	Low	No	X	

Table 5: Results of evaluation as to the most appropriate policy and method options to achieve objective 10

5.4 Discussion of options

Options 1, 2 and 4 are considered appropriate to achieve objective 10 and address issue 2 on infrastructure. Options 1 and 2 (policies 6 and 7) direct district and regional plans to consider the benefits of regionally significant infrastructure, and protect it from incompatible new land uses or activities under, over, or alongside. The listed benefits from regionally significant infrastructure will assist local authorities when changing plan to district and regional plans and making an overall judgement in accordance with part II of the Resource Management Act. Protecting regionally significant infrastructure from incompatible new land uses or activities under, over, or alongside is important to ensure that adverse effects on the operation, use and management of such infrastructure is appropriately considered and managed.

Option 4 (policy 38), is less effective than option 1 (policy 6), however, until such time as option 1 is put in place in district or regional plans, option 4 is appropriate as it provides an interim direction. Once option 1 has been implemented it is proposed that clause (a) of policy 38 shall cease to have effect.

Option 3 is not appropriate. The objectives, policies and methods across the Regional Policy Statement are intended to be read together. The objectives and policies – such as those for landscape, the coastal environment and indigenous ecosystems - need to be considered alongside the policies on the benefits of regionally significant infrastructure. Option 3 seeks that a policy be developed which outlines the key environmental values and constraints that should be considered alongside the benefits of regionally significant infrastructure. Such a policy is considered inappropriate as it would create duplication and confusion about which policies apply in what situations.

Option 5 is not appropriate. In assessing the effectiveness and efficiency of implementing options 1 and 2 it is considered that the derived policies (in later plans) will need to clearly identify what is regionally significant infrastructure. Separate information, potentially derived independently of the required resource management processes, and with no regulatory weight, is, therefore, not considered to be inappropriate.

Doing nothing is not considered appropriate as it would not achieve objective 10 or address issue 2 and the use that the management, use and operation of infrastructure could be adversely affected by incompatible future land uses under, over, on, or alongside.

5.5 Risk of acting or not acting if information is uncertain or insufficient

Section 32(4)(b) of the Resource Management Act requires the evaluation of appropriateness to take into account the risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the policies or methods.

With regard to infrastructure there is neither uncertain nor insufficient information by which to analyse the appropriateness of acting or not acting to address the issues. In deciding on the appropriate options to achieve objective 9, it is considered, however, that it is important that there be sufficient information available that describes what ‘regionally significant infrastructure’ is. This information also needs to be determined at a regional level, as it would be difficult to make such a determination locally, on a case-by-case basis.

6. Evaluation of policies and methods to achieve objective 11

The appropriateness of the policies and methods to achieve objective 9 are evaluated by looking at the effectiveness and the efficiency of the policy and method options, and the risks of acting or not acting if there is uncertain or insufficient information.

6.1 The range of options considered

Objective 11 seeks to reduce waste disposed of in landfills in the region.

In addressing this objective, the primary focus is to determine whether it can be best achieved through regulatory direction to plans, or through regulatory direction as to matters to be considered when making resource management decisions, or through non-regulatory programs, or by doing nothing.

6.1.1 Direction to district and/or regional plans

Option 1 – Direction to district and regional plans to control the type and volume of waste going to landfills

This option requires regional and district plans to include policies and rules to control the amount and type of waste going to landfills.

6.1.2 Regulatory direction as to matters to be given particular regard in resource management decision making

Option 2 – Consider amount of waste going to landfills

This option requires local authorities to have particular regard to the amount of waste going to landfills.

6.1.3 Non-regulatory: information and guidance; integrating management; identification and investigation; providing support

Option 3 – Information about waste management

This option involves preparing information about how to reduce, reuse and recycle waste.

Option 4 – Assist the community to reduce waste

This option involves assisting the community to adopt sustainable practices and reduce, reuse or recycle waste.

6.1.4 Doing nothing

Option 5 – No intervention

This option offers no intervention to reduce waste going to landfills in the region.

6.2

Evaluation as to the effectiveness and efficiency of the policy and method options to achieve objective 11

Policy and method options	Analysis of effectiveness	Effectiveness Rating	BENEFITS (social, economic and environmental)	COSTS (social, economic and environmental)	Efficient?
Regulatory direction to district and/or regional plans					
<p>Option 1</p> <p>Direction to district and regional plans to control the type and volume of waste going to landfills</p>	<p>Establishes a clear and consistent policy framework within which to develop regulatory provisions and/or actions within plans; requires all pertinent plans to control the type and volume of waste able to be received at landfills in the region when developing policy and related actions (rules and/or methods).</p> <p>While such a policy framework would seek to manage the rate of use (and thus delay the retirement) of landfills and the diversion of potential resources from the waste stream, it would be unable to influence directly the production or use of materials typically sent to landfill. Therefore, a direction to manage waste receipt at landfill could provide a perverse incentive to individuals or communities, to dispose of unwanted materials through other, potentially less manageable means (e.g. illegal dumping). Such an outcome would, in turn, limit opportunities associated with the systematic collection, sorting and storage of potential resources, in association with 'waste' and landfill management.</p> <p>Promotes certainty as to how different types and the volume of waste are to be managed.</p> <p>Increases certainty for individual</p>	<p>Low</p>	<p>Provides clear intent to reduce waste to landfill and regional consistency in that councils must control waste disposed of to landfills.</p> <p>Increased clarity and certainty for all parties.</p> <p>Provides a consistent framework and platform for responding to waste issues across the region.</p>	<p>Cost of engaging the community on particular waste issues and for industry compliance.</p> <p>Potential duplication of other required processes and actions under the Local Government Act, to support waste management planning and the provision of services to communities.</p> <p>Regulatory intervention under the Resource Management Act has a potential to undermine the use of alternative regulatory and non regulatory actions targeting waste issues.</p> <p>Policies and rules may act as disincentive to send waste to landfills and could lead to illegal dumping of waste.</p> <p>Increased costs for regional and district plans to implement policy through new district wide studies and other investigations to implement the policy.</p> <p>Potential duplication and confounding aspects of other regional policies that seek to manage the adverse effects associated with activities, (e.g. upon freshwater, air quality, soils and minerals, to integrate land use and infrastructure, renewable energy).</p> <p>Providing certainty in relation to waste management issues is a blunt instrument, when innovation and</p>	<p>No</p>

Policy and method options	Analysis of effectiveness	Effectiveness Rating	BENEFITS (social, economic and environmental)	COSTS (social, economic and environmental)	Efficient?
	<p>applicants, community of interested parties.</p> <p>The management of waste is provided for under the Local Government Act 1974 and 2002. Any regulatory resource management response possible under the Resource Management Act might, therefore, be considered against the variety of options able to be undertaken within an alternative programme, formulated under the Local Government Act.</p> <p>Resource management activity that targets landfill management (at the scale of a community) is quite distant from consumer decision making, and is therefore not likely to be an effective influence upon individual consumer choices.</p>			<p>flexibility are likely to be required to enable timely adaptation to changing circumstances associated with the incentives, technologies, uses and markets for managing resources associated with the waste stream.</p> <p>A likelihood of delays and costs in litigation when formulating and establishing an appropriate regulatory response under the Resource Management Act, to restrict an ability to dispose of waste to landfill or to allocate charges or costs to particular parts of the waste management process, from producer through to consumer, to local authorities overseeing waste management, and the waste management industry and landfill operators.</p>	
Regulatory direction as to matters to be given particular regard in resource management decision making					
<p>Option 2</p> <p>Consider amount of waste going to landfills</p>	<p>Policies are unlikely to be effective by themselves, when making decisions as matters would be broad and generic in addressing all themes.</p> <p>Sets out direction on the need to reduce the amount of waste being disposed of to landfills.</p> <p>Provides an ability to critique what is considered important and relevant within decision making processes, and thus increase understanding of pertinent factors and intent.</p> <p>Transparent as to how these matters are to be treated in decision making.</p> <p>Improves understanding and enhances</p>	<p>Low</p>	<p>Provides a consistent framework with regard to 'considerations' across the region.</p> <p>Allows some discretion and thus variation in interpretation and implementation. The management responses can be adapted to the specific proposal under consideration.</p> <p>While certain triggers or prompts demand certain considerations must be made, the responses or action that results is less certain than specific direction as to matters to be addressed by plans.</p>	<p>While clarifying the matters for consideration, specifying the full extent of matters may not lead to simplicity or certainty. Rather, it may add to complexity. For example to manage potential inconsistencies and therefore, inequalities that may arise as responses will inevitably vary on a case by case basis, and in relation to different scales of activity regardless of their relative contribution to the waste stream.</p> <p>Costs will be borne by some proposals as a result of their activity status as an application for resource consent, and the matters which discretion and/or control</p>	<p>No</p>

Policy and method options	Analysis of effectiveness	Effectiveness Rating	BENEFITS (social, economic and environmental)	COSTS (social, economic and environmental)	Efficient?
	<p>equity within resource management activity.</p> <p>The intervention may only be triggered for certain resource consent applications (where discretion is retained over such issues), which means a different set of benefits and costs to those arising from application at the plan making stage.</p>		<p>The resource management response is less predictable or formulaic as might be anticipated under the earlier direction to district plans options, as decision makers exercise discretion in how they respond to considerations. This option allows for greater variance within the management response, to the triggers presented within a proposal. This provides for an ability to innovate, or to adapt to changing circumstances.</p>	<p>are reserved. Costs will be borne by councils as they are must secure sufficient information pertinent to undertaking the required considerations, within decision making processes.</p> <p>Will demand more information and investigation than absolutely necessary.</p> <p>Flexibility carries some costs, as it might be thought necessary to treat each proposal as unique, rather than allowing a standardised response to develop.</p>	
Non-regulatory options					
Option 3 Information about waste management	<p>Could be effective if all relevant local authorities commit to doing them.</p> <p>A risk is that local actions may not get appropriately resourced.</p> <p>Response to the information is entirely discretionary and voluntary by the recipient, so there is considerable variance as to what it will mean in practice.</p> <p>Can provide clarity and can address duplication, overlaps, or gaps that need to be managed.</p> <p>Establishes a common or standardised methodology for relevant research necessary to progress the objective within the region and/or to address the issue.</p> <p>Provides a platform for coordination of non regulatory programmes or actions across the region, and collaborating for mutual advantage and shared, regional</p>	Med	<p>Allows for flexibility of approach and an ability to adapt quickly to changing circumstances, relative to an imposition of regulatory policies.</p> <p>Recognises that people can “do the right thing” without compulsion.</p> <p>Economically efficient if financial support stimulates private effort and commitment to address the issue.</p> <p>Less likely to lead to litigation associated with establishing a regulatory response under the Resource Management Act.</p> <p>Provides an ability to target and thus influence individual choices and behaviours that contribute to waste to landfill issues, but are not of sufficient merit in isolation to necessitate a resource consent process.</p>	<p>Cost to local authorities of providing appropriate information and material.</p> <p>Potential environmental costs because of a lesser commitment to get things done.</p>	Yes

Policy and method options	Analysis of effectiveness	Effectiveness Rating	BENEFITS (social, economic and environmental)	COSTS (social, economic and environmental)	Efficient?
	outcomes.				
Option 4 Assist the community to reduce waste	Provides initiatives, programmes and actions that support or promote means and ways for individuals and communities to reduce waste to landfill. Provides a platform for coordination of non regulatory programmes or actions across the region, and to collaborate for mutual advantage and shared, regional outcomes.	Med	Allows for flexibility of approach rather than imposition of regulatory policies. Recognises that people can “do the right thing” without compulsion. Acknowledges that non-regulatory programmes and actions are already delivered by local authorities, and recognises that efficiencies and effectiveness could be enhanced with the provision of assistance or support at a regional level, for these efforts. Economically efficient if financial support stimulates private effort and commitment. Implementation of waste reduction measures will reduce amount of waste sent to landfills.	Cost to local authorities of providing appropriate information and material for public education programmes. Potential environmental costs because of a lesser commitment to get things done.	Yes
Doing Nothing					
Option 5 No intervention	This is not effective in resource management terms. Nor could it be argued to be efficient, given the issue continues unabated, and presumably would get worse. As the issue has been found to be regionally significant (refer to criteria in Appendix 1) – this would be a dereliction of function and duty under the Resource Management Act.	Low	Local authorities are able to work with their communities to identify on a case-by-case basis what types of intervention is required – without a predetermined regional policy direction.	The issues will continue in the same trend or pattern, and that the objective will not be achieved. Doing nothing will not achieve the purpose of the Resource Management Act. This is not effective resource management given the issue continues without regional direction lead to continued unsustainable environmental outcomes, including economic, social and cultural outcomes.	No

Table 6: Evaluation as to the effectiveness and efficiency of the policy and method options to achieve objective 11

6.3 Results of evaluation as to the most appropriate policy and method options to achieve objective 11

Policy and method options	Effectiveness	Efficient?	Selected option(s)	Proposed policies and methods
Regulatory direction to district and/or regional plans				
Option 1 Direction to district and regional plans to control the type and volume of waste going to landfills	Low	No	X	
Regulatory direction as to matters to be given particular regard in resource management decision making				
Option 2 Consider amount of waste going to landfills	Low	No	X	
Non-regulatory options				
Option 3 Information about waste management	Med	Yes	✓	Policy 65 and Method 17
Option 4 Assist the community to reduce waste	Med	Yes	✓	Policy 65 and Method 55
Doing Nothing				
Option 5 No intervention	Low	No	X	

Table 7: Results of evaluation as to the most appropriate policy and method options to achieve objective 11

6.4 Discussion of options

Overall a package of non-regulatory options is considered appropriate to achieve objective 11.

Option 1 requiring district and regional plans to control the type and volume of waste going to landfills is not appropriate as district and regional plans are not able to effectively target the behaviours or activities that give rise to ‘materials’ which, depending on use and preferences of consumers might become ‘waste for disposal’. That is, the intervention has only limited effect or influence upon the factors contributing to the issue, as it targets the sum or cumulative effect of numerous small scale activities, which collectively culminate in a community’s rate and volume of waste disposed to landfill. Further to that, option 1 is not the only mechanism available to local authorities in performing their functions and duties in relation to waste management, as this function is expressly provided for under the Local Government Act 1974 and 2002. A regulatory resource management response is considered to be a blunt, as well

as a less effective and efficient response to the issue, than alternative mechanisms able to be developed under the Local Government Act.

Similarly, option 2, is not appropriate. Non-regulatory actions are assessed as being the most effective and efficient resource management responses to achieve objective 11 and address the issue. Option 3 (policy 65 and method 17) 'Information about waste management' will create an awareness over time within the community of the principles of reducing, reusing and recycling and how to do so. Option 4 (policy 65 and method 55) 'Assist the community to reduce waste' allows for direct engagement with the community in order to deliver programmes and actions that assist individuals and communities to reuse, reduce and recycle waste.

Doing nothing is not considered appropriate as it would not achieve objective 11 or address issue 3. The region cannot continue to generate the current waste volumes because of the cost of disposal, limited space in existing landfills and because it is inefficient to dispose of potentially valuable resources. Developing new landfills also poses significant challenges economically, environmentally and socially.

6.5 Risk of acting or not acting if information is uncertain or insufficient

Section 32(4)(b) of the Resource Management Act requires the evaluation of appropriateness to take into account the risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the policies or methods.

With regard to waste, there is neither uncertain nor insufficient information by which to analyse the appropriateness of acting or not acting upon the issues.

If no action is taken, even with uncertain or insufficient information, there is a high risk of more waste going to landfills.

Appendix 1: Criteria used to determine regionally significant issues

The criteria used for determining whether an issue was a resource management issue of regional significance were:

- The issue was a natural or physical resource management problem.
- The issue was to be of regional significance (see further criteria below).
- The issue was about achieving the purpose of the Resource Management Act.
- The issue did not “repeat” the Resource Management Act, the New Zealand Coastal Policy Statement, any other national policy, or another issue in the Regional Policy Statement.
- The issue was explained in the context of the Wellington region.

Regional significance was determined using the following criteria

- The issue concerns a resource which is regionally significant, and the issue requires integrated management at a regional level ; and
- There is a potential shortage of the resource and resultant allocation issues; or
- There is a significant level of conflict over the resource which is either occurring or is foreseeable over the next 10 years; or
- The resource is potentially subject to significant adverse effects at a regional level; or
- There are significant issues in terms of Part 2 of the Resource Management Act which are, or are likely to, arise at a regional scale (eg maintenance and enhancement of access along waterways); or
- The community has signalled that it regards a particular issue as being of regional significance; or
- The issue is one of national significance (eg preservation of natural character) and requires regional intervention; or
- The issue is one of district significance but requires regional intervention; or
- The matter is one which a National Policy Statement or National Water Conservation Order requires to be addressed.

Appendix 2: References

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