

4 August 2021

Ministry for the Environment - Manatū Mō Te Taiao  
PO Box 10362  
Wellington 6143  
New Zealand

Tēnā koutou,

## **SUBMISSION ON THE NATURAL AND BUILT ENVIRONMENTS BILL EXPOSURE DRAFT**

1. The Dunedin City Council (DCC) thanks the Environment Select Committee (Select Committee) for the opportunity to submit on the exposure draft of the Natural and Built Environments Act (NBA).

### **Introduction**

2. The DCC acknowledges that replacing the Resource Management Act 1991 (RMA) is a significant undertaking. It has a keen interest in the RMA reform as it will fundamentally change the way in which local government delivers resource management functions in Aotearoa.
3. The DCC acknowledges that there is still a significant amount of work to be done on the design of the new legislative system, including to draft the balance of the NBA and to draft the Strategic Planning Act (SPA) and Climate Change Adaptation Act (CAA). There is also a considerable amount of work to be done to put in place necessary arrangements to enable an effective transition from the current system to the new one.
4. While the exposure draft provides some helpful indications as to the Government's intended direction of travel, the DCC notes it also creates many uncertainties. While we appreciate that the exposure draft was not intended to contain all the detail to be included in the final Bill, the outcome is a situation where the exposure draft raises a number of questions for the DCC and this is reflected in the submission.

### *Engagement with local government on the resource management reform programme*

5. The DCC notes the critical role that local government plays in the management of the natural and built environments in Aotearoa.
6. Although the Government's reform of the resource management system is proposing fundamental change to the role that local government plays, the DCC notes that local government will continue to play a critical role in the delivery of the new system. For example, while plan making will be moved to a regional planning committee with a regional secretariat under the NBA, the DCC envisages that it will still be expected to invest in the implementation of natural and built environment plans.
7. For this reason, the DCC believes it is vital that the Government engages closely with local government on its reform programme. Local government must be engaged not only in the

design of the NBA, SPA and CAA but also on what arrangements and support will be needed for effective transition to and implementation of the new system. Given the significant scope of the reform programme, and the time that the transition will take, close engagement with local government will be required for some time.

8. To date, the DCC is not satisfied that the Government's engagement with local government is proportionate to the significance of the resource management reform programme, or the implications that it will have for the sector. The DCC acknowledges that the Minister for the Environment (Minister) has signalled to Mayors, Chairs and Chief Executives a desire to engage with local government in a more substantive and enduring way. The DCC wishes to emphasise the critical importance of this engagement. The DCC recommends the Government work closely with Taituarā and Local Government New Zealand (LGNZ) to find an effective mechanism for genuinely and meaningfully partnering with the sector on the reform programme. If such engagement is to be effective and enduring, it will need to be adequately resourced by the Government.
9. The DCC is concerned about the pace and timing of the resource management system reform. The DCC notes that the timeframe for making a submission on the exposure draft has been challenging. The resource management system touches on many aspects of local government's business, which means time is needed to coordinate input from a range of different departments. Staff also need time to work through submission content and sign-off processes with elected members. The tight timeframe for submitting on the exposure draft makes engagement in a meaningful way challenging for local government.
10. Ensuring appropriate local input into place-making decisions is of critical importance to both local government and mana whenua. But it appears that there is a fundamental disconnect between this view and the views of the Government as reflected in the exposure draft. That's despite the Prime Minister recently saying in a speech to the LGNZ Conference, "We want to support councils to envisage a role that is not about pipes and plants but is about place-making, place-building and wellbeing." Slowing down the reform process would allow the Government to properly partner with local government and mana whenua to design a system that not only better aligns with the needs of its key implementation partners, but also reflects all parties' desire for strong community involvement in place-making and place-building.
11. While the DCC understands that part of the rationale behind an exposure draft process is to allow for early feedback from interested parties, the DCC notes that much of the underpinning detail will be set via the National Planning Framework (NPF). Without more detail on the contents of the NPF, or the process for developing it, it is difficult for the DCC to provide more meaningful input at this stage.

#### **Overarching comments on NBA and reform process more broadly**

12. The DCC broadly agrees with and supports the Government's five objectives for the reform of the resource management system, being:
  - 1) Protect and restore the environment and its capacity to provide for the wellbeing of present and future generations.
  - 2) Better enable development within natural environmental limits.
  - 3) Give proper recognition to the principles of Te Tiriti o Waitangi and provide greater recognition of te ao Māori and mātauranga Māori.

- 4) Better prepare for adapting to climate change and risks from natural hazards, and better mitigate emissions contributing to climate change.
  - 5) Improve system efficiency and effectiveness, and reduce complexity while retaining appropriate local democratic input.
13. The DCC also supports the Government's commitment to giving Māori a greater and more strategic role in the new system. Māori need to be closely engaged in the design of, transition to, and implementation of the new system.
14. However, despite these areas of support, the DCC is concerned with the reform process and some aspects of the reform. Key areas of concern are as follows:
  - The reform of the resource management system needs to align with other reforms impacting the local government system, including Three Waters Reform and the Review into the Future for Local Government. The DCC is concerned that the reform programmes do not currently appear to be well integrated.
  - The proposals around the creation of regional NBA plans and establishment of regional planning committees have the potential to undermine the ability of local communities to influence and make decisions about the place they live. Clarity is required as to what roles and functions constituent local authorities will continue to play in the new resource management system.
  - The local government and resource management sectors are already facing significant capacity issues and will struggle to deliver on a new system while continuing to progress essential short-term planning work.
  - The purpose of the NBA as currently drafted is unclear and there is likely to be a number of costly, lengthy and time-consuming arguments to test these new provisions and work through the conflicts between the competing, un-prioritised considerations listed in Clause 8. This is at odds with the Government's objective of a resource management system that is more efficient, effective and less complex. A clearer hierarchy of priorities (as in the NPS-FM) would assist.
  - The quality of the built environment, including the quality of housing and good urban design, is missing from the drafting and should be included as a key environmental outcome. Built environment outcomes, including those outlined in the Government Policy Statement on Housing and Urban Development are key contributors to social wellbeing and health outcomes for our communities.

#### *The importance of local democratic input*

15. The DCC is concerned that the proposals around the creation of regional NBA plans and establishment of regional planning committees have the potential to significantly undermine the ability of local communities to influence and make decisions about the place they live.
16. While the DCC acknowledges there are many details yet to be worked through, the DCC is concerned about ensuring there will be genuine and meaningful opportunities for public input in a larger system and larger plan making process. Usually participation is higher when the policy or plan being developed and consulted on is easier to engage with. This is influenced by how easily people can understand the policy or plan and how it might affect them or the things they

have an interest in. The DCC considers that larger plans are more likely to reduce the number and breadth of people who will actively engage in the process.

17. Further exacerbating the loss of local input into plan making is the proposal to significantly reduce input by democratically elected local representatives. This is reflected in both the proposed membership of the planning committees that will be responsible for making NBA plans, and the proposed shift to greater use of national direction which has very low levels of engagement and elected-representative democratic input.
18. The DCC is concerned about the risk of losing local control of and democratic input into resource management planning. The DCC would like to see this more openly communicated if the Government's view is that it is a necessary cost to achieving better system efficiency. The DCC submits this cost should be offset by a greater emphasis on evidence-based decision-making including stronger requirements for social impact assessment of policy decisions and urban form options and close attention to how to offset the cost of change.

*Transition to and implementation of the new resource management system*

19. The success of the new resource management system, and whether it achieves the Government's reform programme objectives, will depend in large part on how well the transition to and implementation of the new system is planned for, managed and resourced. The DCC submits local government needs to be closely engaged with on transition and implementation arrangements. This should include consideration of what resourcing from central government will be needed to support transition and implementation.
20. The introduction of new legislation, particularly with a purpose clause, will mean that the suite of case law developed under the RMA will be lost. The DCC anticipates that there will be a number of costly, lengthy and time-consuming arguments to test the new provisions of the NBA and how its hierarchy of supporting provisions is to be applied where there are conflicts. It seems inevitable that such legislation will involve, and come at significant cost, to local government.
21. As part of resourcing the implementation of the new system, the DCC suggests central government consider setting aside funding now to support local government with early litigation, particularly by participating in hearings to test the meaning of the legislation as an interested party. The DCC also suggests that as a Treaty partner, the Crown should fund participation by mana whenua in the new system.
22. The DCC notes the shift from managing adverse effects to complying with environmental limits and promoting outcomes for the benefit of the environment will require a change in planning culture. There will need to be significant investment in building local government's capability, including through training and guidance to work within the new system. The DCC believes that central government resourcing to support such capability building will be essential. It should work closely with Taituarā and LGNZ who are well connected to the local government sector to deliver capability building and support.
23. The DCC further notes there will also be a need to educate users of the resource management system (such as consent and designation applicants) of the changes to the system. Local government will likely play a significant role in this, given its proximity to communities who are the primary users of the resource management system. Central government should provide

support and resourcing to local government to assist with this important part of the transition to and implementation of the new system.

*Local government's capacity within the resource management system*

24. While the DCC acknowledges that some of the current resourcing challenges may be helped through the creation of more efficient and joined up processes and structures, the DCC submits the work involved in transitioning to the new system – coupled with existing work pressures, for example in relation to implementing the new National Policy Statement for Freshwater Management (NPS-FM) and National Policy Statement on Urban Development (NPS-UD) requirements and working through second generation plans – will place considerable strain on an already stretched workforce.
25. DCC staff are concerned that the momentum that is building through implementation of the NPS-UD, which will help alleviate issues around housing capacity, may be lost through disruptive changes, particularly given current capacity constraints within local government and the planning and engineering sectors more broadly. Sufficient time should be provided to implement and measure the effectiveness of these new initiatives.
26. The proposal to completely overhaul the resource management system at this time carries a high risk of failure due to the sheer scale of change and the lack of alignment between new proposed delivery mechanisms and existing institutions and governance arrangements. The DCC suggests that a staged approach to the reform programme would better deliver on the Government's objectives for the reform programme and reduce risks associated with the current proposal.

*Existing plan provisions*

27. The DCC requests greater clarity around whether there will be the ability to carry across any provisions that have been developed through existing plan making processes, and indeed whether these provisions can be brought across without re-opening them for debate. The DCC recently completed its second generation district plan and is in the final stages of working through remaining appeals. This has been a significant investment for the DCC as well as all parties that have been involved in the process.
28. While in principle the DCC appreciates that developing NBA plans is a good opportunity to rationalise and consolidate existing planning provisions, the DCC urges the Government to maintain sight of the significant amount of time and money that has been spent by local government (and its communities) over the years on plan making and review processes, and the considerable amount of public, other local authority and Environment Court input into these processes. Especially for medium and high growth cities such as Dunedin, it would be disappointing to lose the recent significant investment and progress that has been made to reach agreement on important issues (including ways of adding capacity for housing) through lengthy and expensive mediation or Court processes by reopening these matters.
29. The DCC views the 2GP as a good foundation Plan for the city for the next 10-15 years, and it sees its priority for planning is the development of the Future Development Strategy and any focused plan changes necessary to respond to the population growth and increased investment in the city. The need to prepare for a system overhaul is likely to be a distraction that could threaten momentum and progress on providing housing and business land capacity and implementation of national direction around water quality and biodiversity.

## Recommendations

The DCC recommends that:

1. The reform of the resource management system needs to align with other reforms impacting local government systems, such as the Three Waters Reform and the Review into the Future of Local Government.
2. The Government ensures adequate local democratic input into plan making processes under the new legislation.
3. The Government closely engages with local government on transition and implementation arrangements of the new system, including considerations of the resourcing needed to support this and the resourcing required for participation by mana whenua in the system.
4. The Government ensures capacity within the resource management system to transition to the new system as this will place considerable strain on an already stretched workforce.
5. The Government provides local government with greater clarity on whether there will be the ability to carry across any provisions that have been developed through existing plan making processes.

## **Clause 5: Purpose**

30. The DCC prefers the wording of clause 5 (purpose) in the Randerson report as it provides a more balanced purpose with a greater focus on outcomes (including for the built environment). The DCC prefers the principle of wellbeing at a higher level in the purpose and not tied to the concept of 'use' of the environment.
31. The DCC is concerned that the current drafting of the purpose clause creates a number of uncertainties. From the parliamentary paper, it appears the intent is that the purpose of the NBA is to enable land use and development only if environmental limits are complied with. Staff are not convinced that clause 5 clearly articulates this as the purpose of the NBA.
32. As an example, it is unclear from the reference to "protecting and enhancing the natural environment" in clause 5(1)(a) whether the intent is that development only proceed if environmental limits are met. Further, use of the word "and" to connect environmental limits, environmental outcomes, and managing adverse effects in clause 5(2) creates some confusion as to whether any of those supporting provisions are prioritised over others (i.e. whether an activity that promotes development focused outcomes can proceed if it doesn't comply with environmental limits).
33. The DCC suggests that clause 5 be amended to more explicitly provide that people and communities can use the environment only if doing so complies with environmental limits, if this is indeed the intent.
34. The DCC understands that inclusion of clause 5(2)(c) is in part intended to ensure that any adverse effects not covered by environmental limits or outcomes are avoided, remedied or mitigated. However, we have some concerns that the requirement to avoid, remedy or mitigate *all* adverse effects (on top of meeting environmental limits and promoting outcomes for the benefit of the environment) has the potential to undermine the Government's objective of a

resource management system that is more efficient, effective and less complex. The DCC sees real potential for repeated, lengthy and costly arguments about whether an activity will deliver outcomes for the benefit of the environment, or an adverse effect that needs to be managed.

#### Recommendations

The DCC recommends that:

1. Clause 5 be reviewed to include specific reference to the built environment, a greater focus on outcomes that the Government seeks to achieve with respect to development and elevating the principle of wellbeing to a higher level in the purpose.
2. Further work is completed to refine clause 5 to ensure that the Government's intended purposes are explicitly clear. This should include clarifying whether the Government's intent is that development should only proceed if environmental limits are met.
3. Further work is completed to refine the concept of Te Oranga o te Taiao with mana whenua and local government. This should include clarifying the relationship between Te Oranga o te Taiao and the concept of ecological integrity.
4. The matters referred to in clause 5(2) be consolidated and prioritised.
5. The Government commits to setting aside funding to participate in early litigation that tests the meaning of the new legislation.

#### **Clause 6: Te Tiriti o Waitangi**

35. The DCC supports the Government's commitment to giving proper recognition to the principles of Te Tiriti o Waitangi and providing greater recognition of te ao Māori including mātauranga Māori in the new system. The DCC supports the introduction of the concept of Te Oranga o te Taiao in clause 5(1)(a). The DCC notes that it is important that government officials continue to work with mana whenua to refine this integral concept.
36. The DCC supports the Government's commitment to giving mana whenua a greater and more strategic role in the new resource management system. The DCC also supports the new approach of 'giving effect' to the principles of Te Tiriti o Waitangi, in place of the requirement under the RMA to take those principles into account.
37. The DCC notes that greater involvement in the resource management system for mana whenua is likely to raise expectations and bring focus on other areas of the DCC's partnership arrangements with mana whenua. Section 4 of the Local Government Act 2002 (LGA) clearly acknowledges that responsibility for Treaty obligations lies with the Crown. A requirement to 'give effect to' the principles of Te Tiriti under the NBA (and greater expectations around local government's partnership with mana whenua more generally) will necessarily lead to some re-consideration of section 4 of the LGA, and the future relationship between mana whenua and local government. The DCC acknowledges that these are matters being considered by the Future for Local Government Review.
38. The DCC acknowledges that the shift from 'taking into account' under the RMA to 'giving effect' under the NBA will require a significant change in local government culture and broader ways of working for local government. To ensure that the DCC is able to meet the 'give effect to'

expectation, central government will need to support and resource the transition to this new approach, including by providing guidance and training to local government. Without clear guidance, the difficulty local government has had with the current RMA section 8 requirement will continue.

39. The DCC notes that it remains to be seen how well the new resource management system will 'give effect' to the principles of Te Tiriti. Co-designing with mana whenua is one very real way in which the Government can give effect to the principles of Te Tiriti. Resourcing to support mana whenua to engage meaningfully in the new system will be critical. This resourcing should come from the Crown, as the Treaty partner. Local government will also need support (including resourcing) to build its capability and capacity to partner with mana whenua effectively and meaningfully.
40. The DCC notes that it is not yet clear what the Government's position is on the Review Panel's recommendation around the establishment of a body to oversee and advise on whether there is effective and efficient compliance with clause 6, and other clauses that relate to providing a greater and more strategic role for mana whenua in the system. The DCC would support the establishment of an oversight and monitoring mechanism in principle, particularly to ensure the clause 6 requirement is being satisfied, and to provide direction on where improvements are needed within the system.
41. The DCC notes that Māori definitions used throughout the NBA should be clearly defined and applied consistently across the legislation including the SPA and CAA. Consistency with Māori terms used in the LGA should also be resolved. Clarity around the use, meaning and application of te reo terms and concepts will help to address the ambiguity that exists in the current system.

#### Recommendations

The DCC recommends that:

1. The Government continues to refine the concept of Te Oranga o te Taiao with mana whenua and local government.
2. The Government continues to refine clause 6 in partnership with mana whenua and with input from local government.
3. The Select Committee recommends that guidance on how to 'give effect' to the principles of Te Tiriti is developed in partnership with mana whenua and local government, and that this be included in the provisions of the NBA itself.
4. Mana whenua participation in the new system is funded by Government, as the Treaty partner.
5. Resourcing is allocated by Government to support local government to 'give effect' to the principles of Te Tiriti, including via training/capability building initiatives.
6. The Government continues to give thought to the future role for mana whenua in the local government system, including via the Future for Local Government Review, and that such work includes specific consideration of the new requirement in clause 6 of the NBA.



7. Options for developing a body to oversee effective and efficient compliance with clause 6 continues to be explored. This should happen in partnership with mana whenua and with input from local government.
8. Consistent definitions for te reo Māori terminology and concepts are adopted across the suite of new resource management legislation, and other related legislation (including the LGA).

#### **Clause 7: Environmental limits**

42. The DCC notes that it is unclear how environmental limits will be set, what they will look like in a practical sense, and what their relationship to outcomes will be. It seems that limits would often need to be set at a systems level for many aspects of the natural environment, and it is unclear how this will be applied to considering effects of individual activities or developing plan rules. It is important to engage further on this concept to ensure it is workable.

#### Recommendations

The DCC recommends that:

1. Further work is undertaken to clarify how environmental limits will be set, what they will look like practically, and the relationship between environmental limits and outcomes.
2. Local government is closely engaged on the development of the process for setting environmental limits to ensure that the limits will be workable and take account of local variation.

#### **Clause 8: Environmental outcomes**

43. The DCC submits that Section 8(k) should include content relating to the quality of the built environment, including housing, that can be used to ensure good urban design principles (as outcomes) are included in NBA plans.
44. Appropriate built environment outcomes might include design for sunlight (especially in colder parts of New Zealand), privacy, interaction with the public, and other matters. Without the inclusion of these design elements, there is a risk that areas where the objective is to entice more people to live will become unattractive to a larger segment of the population.
45. The DCC asserts built environment outcomes are of critical importance to councils and their communities, as important contributors to social wellbeing and health outcomes. Their inclusion would help to ensure consistency with other work programmes the Government has underway in respect of quality housing, including the draft Government Policy Statement on Housing and Urban Development.

#### Recommendations

The DCC recommends that:

1. Section 8(k) include content relating to the quality of the built environment and housing, including urban design principles, so that these elements are provided for in NBA plans.
2. This will help ensure the outcomes of the proposed Government Policy Statement on Housing and Urban Development are achieved.

#### **Clauses 8 – 18: National planning framework**

46. The rapid pace of work, pressure on MfE staff, and inadequate engagement with local government and other people experienced in plan development and implementation creates risks in the drafting and development of the national planning framework content.
47. The DCC recommends the Government consider creating more in-depth processes for experts and key stakeholders, including local government experts (at a minimum), to submit on this content and for that feedback to be considered by a suitably qualified panel of experts.

#### Recommendations

The DCC recommends that:

1. Further thought be given to establishing a panel of experts, commission or board of inquiry to oversee the development and maintenance of the NPF.

#### **Clauses 19 – 22: Natural and built environments plans**

48. The DCC agrees in principle that a single, regional natural and built environment plan could be easier for regular users of plans (especially resource management consultants that work across the country). However, it is not yet clear whether navigating those plans will be any less complex, particularly as it is not clear what will be included within NBA plans.
49. With this uncertainty, the DCC is concerned whether a regional-scale approach will adequately address local concerns and needs at an appropriate level of granular detail. The DCC recognises the requirement for NBA plans has the potential to diminish the role and voice of local communities in plan making, although the extent to which this proves to be the case will depend in large part on decisions yet to be made around the contents of NBA plans and arrangements for developing them.
50. The DCC submits the complexity of developing new NBA plans that will take account of multiple (and potentially competing) regional interests should not be under-estimated. In Otago, there is significant variation between places for example Queenstown, Clutha and Dunedin. These differences are wide-ranging, covering a breadth of factors including (but not limited to) socio-economic conditions; urban vs rural communities; different land uses; variation in population sizes and high growth versus no growth communities.
51. The DCC would suggest that keeping metropolitan-area focused plans – for example a Plan for Dunedin would make more sense than a combined plan for all of Otago. If regional-scale plans are still favoured after consideration of the matters raised through the select committee process, the DCC broadly supports aligning regional council boundaries for the purpose of the new NBA plans with any regional or other boundary changes that may occur through the review

of the Future For Local Government. Overall, it is critical that the two reviews align to avoid any further costs associated mis-aligned changes.

#### Recommendations

The DCC recommends that:

1. That NBA plans are kept to the metropolitan area level e.g. a plan for Dunedin versus a combined plan for Otago.
2. The Government continues to work with local government to clarify the contents and design of NBA plans. This should include determining the extent to which existing planning provisions can be rolled across into new NBA plans.

### **Clauses 23 – 25: Planning committees**

#### *Clause 23: Planning committee*

52. The DCC notes the proposal to establish regional planning committees will fundamentally change the way in which resource management planning is delivered in Aotearoa. The DCC observes there will be a significant shift of roles and responsibilities from the regional and territorial authorities that currently draft district and regional plans and regional policy statements, to new Planning Committees supported by secretariats that will draft the new plans for each region.
53. The DCC is concerned that this major shift has the potential to significantly reduce opportunity for local input into decision-making and for the public to engage in plan making processes, particularly given that planning committees are unlikely to be accountable to constituent local authorities. The DCC anticipates some political and community opposition to councils being responsible for implementing plans that they have had very limited involvement in developing.
54. The DCC recommends that the Government continues to work with local government to clarify what role each constituent local authority will continue to play (or not) in the new system with respect to providing policy making, technical advice, public engagement and plan making.
55. The DCC suggests that thought is given to whether sub-regional committee structures may help to ensure appropriate local input, although the DCC acknowledges that this may add a further layer of complexity into an already complex system. The DCC wishes to be involved in such discussions.

#### Recommendations

The DCC recommends that:

1. The Government continues to work closely with local government on clarifying roles and resolving which resource management functions continue to sit with constituent local authorities.

### **Schedule 3: Planning committees**

#### *Clause 5: Planning committee secretariat*

56. It is not yet clear what the Government's thinking is around the organisational and management structure of planning committee secretariats. It is unclear who would employ secretariat staff. Key questions include whether a separate organisation would be created or if it would be housed within a regional council. The latter option could create conflicts with achieving representation across local authorities. It may also be impractical to house staff centrally with existing staff spread throughout the region and potentially unwilling to relocate.
57. The DCC suggests the Government considers placing regional planning committees and secretariats in an independent location (not at regional councils) and/or physically retaining existing staff (i.e. seconded to the secretariat) within their constituent organisations.
58. The DCC notes that one important point that doesn't yet appear to have been addressed is what role mana whenua representatives will play within the secretariats themselves.

#### *Clause 6: Local authorities must fund secretariat*

59. If the intention is that local government funds the secretariats, the DCC notes there is still a considerable amount of detail to be worked out, including the proportion of funding that each local authority provides; whether funding would be provided by all local authorities in a region or only those represented on a planning committee (if the final decision is that not all local authorities are represented); the frequency with which funding would be provided; and what the funding would cover and how to guarantee that sufficient funding would be allocated through Long Term Plans (LTPs) and what that means for local community input into LTPs.
60. The DCC suggests that central government funding of planning committee secretariats may be appropriate and asks that the Government gives this further consideration.

#### Recommendations

The DCC recommends that:

1. The Government considers placing regional planning committees and secretariats in an independent location and/or physically retaining existing staff within their constituent organisations.
2. The Government addresses the role of mana whenua representatives within the planning committees and secretariats.
3. The Government considers funding the planning committee secretariats. Funding arrangements should be worked out in partnership with local government.

### **Concluding remarks**

61. Thank you for the opportunity to submit on the Natural and Built Environments Act exposure draft.

62. If the Ministry for the Environment would like to clarify any of the issues raised in the submission, please do not hesitate to get in touch.
63. The DCC looks forward to working with the Government, partner agencies, mana whenua, businesses and communities on this important transition.
64. The DCC wishes to speak to this submission.

Yours faithfully,

A handwritten signature in blue ink, appearing to read 'Aaron Hawkins', with a stylized, flowing script.

Aaron Hawkins  
**Mayor of Dunedin**