

Hamilton City Council – Proposed Variation Number 1: Ruakura Assessment against the Waikato-Tainui Environmental Plan- Te Tumu Tai Paru Tai Ao

1.0 Introduction

The Ruakura Variation considers land that came into the City in 2011 as part of a boundary adjustment with Waikato District Council. The variation will integrate two sets of planning frameworks into one. The Board of Inquiry Decision for Tainui Group Holdings Ltd and Chedworth Properties Limited plan change to the Operative District Plan (2012), and the deferred matters for the Notified Hamilton Proposed District Plan (PDP) will be addressed. The plan change has established provision for an inland port and surrounding logistics and industrial park development.

The composition of land uses confirmed by the Board's Decision and the additional land include an inland port, logistics, industrial park, knowledge and residential uses. The quantity of "industrial-type" land zoning has been driven by the Waikato Regional Policy Statement which has identified 405ha for industrial nodes at Ruakura to 2050.

The Waikato-Tainui Environmental Plan - Tai Tumu Tai Paru Tai Ao (the Plan) was developed from the long-term development approach document called Whakatupuranga Waikato-Tainui 2050, which is the blueprint for cultural, social and economic advancement for Waikato-Tainui. The key strategic objectives of the Plan include tribal identity and integrity, with the Plan *"designed to enhance Waikato-Tainui participation in resource and environmental management. The overarching purpose of the Plan is to provide a map or pathway that will return the Waikato-Tainui rohe (region) to the modern day equivalent of the environmental state that it was in when Kiingi Taawhiao composed his maimai aroha"*.

The Plan is the recognised environmental planning document for Waikato-Tainui, pursuant to section 35A of the Resource Management Act 1991 (RMA). As such, and pursuant to section 74(2A) of the RMA, Hamilton City Council as the local authority is required to take into account any relevant planning document recognised by an iwi authority and lodged with the territorial authority. Further, section 40 of the Waikato-Tainui Raupatu Claims (Waikato River) Settlement Act 2014 states that a local authority preparing a RMA planning document must recognise the Plan in the same manner as would be required under the RMA.

As highlighted in the Waikato-Tainui Environmental Plan, Kiingi Taawhiao referred to the *'river of life, each curve more beautiful than the last'*, and noted the *'smooth belly of Kirikiriroa with its gardens bursting with the fullness of good things'*. The objectives and policies contained in the Waikato-Tainui Environmental Plan are articulated generally, with a number of relevance to the Ruakura area. The following assessment goes into detail on the matters of importance for the Ruakura area.

A Tangata Whenua Working Group (TWWG) incorporating representatives from 4 local haapu including Ngati Wairere, Ngati Mahanga, Ngati Koroki-Kahukura and Ngati Haua is being set up to ensure continued and consistent engagement in the development of the Ruakura area as a whole.

2.0 Consultation and Engagement with Waikato-Tainui Raupatu Trust (Waikato-Tainui)

Chapter 6 of the Plan highlights the importance of consultation with Waikato-Tainui and ensuring that it is undertaken in a consistent, participatory manner. Council staff and Waikato-Tainui have been involved as a working group meeting together to engage in the preparation of the Variation, in accordance with the Joint Management Agreement (JMA). Waikato-Tainui were also actively engaged through the Ruakura project as it progressed through the Proposed District Plan and Board of Inquiry processes, prior to the preparation of this Variation.

3.0 Strategic objectives and policies

The following identifies the strategic objectives and policies of the Plan that are relevant for consideration against the Variation.

3.1 Tribal Strategic Plan

The strategic objectives in Chapter 10 Tribal Strategic Plan are already considered in part by the PDP through Chapter 2 Strategic Framework, which is also applicable to the Ruakura Variation. Specifically, the Strategic Framework incorporates objectives and policies of its own which acknowledge and promote the important relationship that tangata whenua have with the City. These include:

- Objective 2.2.8 *“Resource management priorities are to be developed in partnership with tangata whenua”*.
- Policy 2.2.8c confirms that decisions on land use, subdivision and development include ongoing consultation and collaboration with tangata whenua where appropriate, as part of the development process.

The above is achieved through frequent open dialogue with Waikato-Tainui on all matters regarding Ruakura. As a joint working group, Council and Waikato-Tainui have maintained active engagement in accordance with the JMA.

3.2 The Vision and Strategy for the Waikato River (Te Ture Whaimana o Te Awa o Waikato)

Within Chapter 11 of the Plan, Objective 11.7.1 and 11.7.2 relate to giving effect to the vision and strategy of the Waikato River and state the following:

- Objective 11.7.1: *“Te Ture Whaimana prevails in any resource management, use and activity within the Waikato River catchment in the Waikato-Tainui rohe”*, and
- Objective 11.7.2: *“Te Ture Whaimana is a guide to resource management, use, and activities in all catchments within the Waikato-Tainui rohe.”*

Chapter 1 Plan Overview part 1.1.2.2b) of the PDP specifically considers the Vision and Strategy of the Waikato River. This and the related sections of the PDP for example, Volume 2, Appendix 10: Waikato River Corridor and Gully Systems, sets out Te Ture Whaimana o Te Awa o Waikato Vision and Strategy for the Waikato River are applicable to the Ruakura Variation. Therefore the Vision and Strategy for the Waikato River is embedded into the PDP and consequently into the Ruakura Variation.

It is also noted that section 4.1 Freshwater of this report highlights the importance of work which will be undertaken in relation to greenbelt restoration and ecological and waters management as a result of this Variation, to meet the Vision and Strategy.

3.3 Waikato-Tainui Communities

Chapter 13 of the Plan focuses on Waikato-Tainui Communities and outlines the types and importance of papakaaigna. The objective and relevant policies listed in the Plan to illustrate this importance include:

- Objective 13.3.1: *“Papakaaigna development is sustainable and supported,”* and

- Policy 13.3.1.1: *“To ensure that papakainga development is sustainable and supported,”* and
- Policy 13.3.1.2: *“To ensure that papakainga are able to be developed in rural and urban areas.”*

The Residential chapter of the PDP makes provision for papakainga housing as a restricted discretionary activity in the General Residential and Large Lot Residential Zones, or discretionary in the Ruakura Medium-Density Residential Zone. By providing for papakainga housing in the PDP, and specifically within the Ruakura area which is subject to this variation, the objectives and policies of this chapter of the Plan are given effect to. It is noted that the Ruakura area will be fully urbanised with no rural zoning, and therefore policy 13.3.1.2 in the Plan in relation to papakainga development in rural areas is not applicable to this variation.

3.4 Customary Activities

Chapter 14 of the Plan addresses customary activities and the unique and historical relationship that Waikato-Tainui has with its traditional lands and waterways. The Plan includes the following objectives of relevance to the Ruakura variation:

- Objective 14.3.1: *“Waikato-Tainui access to and ability to undertake customary activities and resource use, including along the margins of waterways, is protected and enhanced”,* and
- Objective 14.3.2: *“The ability of Waikato-Tainui to undertake customary activities is protected and enhanced within the rohe, particularly on, in, and around waterways and their margins, including wetlands and reserves.”*

This chapter largely focuses on customary activities around and within waterways, which is relevant for the variation area. The Waikato River is well beyond the Ruakura variation area however it has tributaries which run through it and it is within the catchments of the river. It is not considered that the variation will impinge on customary activities. The gullies and greenbelt in the Ruakura area will be of particular importance to Maori in relation to customary activities. In relation to land based customary activities, there is no specific provision in the PDP for customary Maori activities apart from papakainga housing (see section 3.3 above), however these activities have also not been excluded.

3.5 Natural Heritage and Biosecurity

Chapter 15 relates to natural heritage and biosecurity, and outlines the concerns of Waikato-Tainui in relation to indigenous plant and animal species. This is highlighted through the following objectives of the Plan:

- Objective 15.3.1: *“The full range of Waikato ecosystem types found throughout the Waikato-Tainui rohe are robust and support representative native flora and fauna,”* and
- Objective 15.3.2: *“Cultural, spiritual, and ecological features of the Waikato landscape that are significant to Waikato-Tainui are protected and enhanced to improve the mauri of the land.”*

A greenway which provides a continuous band of green space throughout the area incorporating large areas of native and exotic planting, recreational open space and stormwater infrastructure, were proposed through the Plan Change and have been retained and continued through this variation.

The ecological specialist of Tainui Group Holdings Ltd and Chedworth Properties Ltd, Mr David Slaven, described in his evidence how the establishment of this greenway will provide mitigation for the loss of freshwater habitat through this development. Mr Slaven clarifies that this freshwater habitat is largely in the form of channelized farm drains with little

riparian vegetation and low ecological value and water quality. Linear wetland swales and stormwater wetland swales will replace this. The variation includes policies from the Plan Change, for example:

- Policy 3.7.2.5e which requires an applicant to *“retain and re-establish viable populations of the black mudfish, longfin eel, shortfin eel, and indigenous lizards within the Ruakura Structure Plan, by the establishment and management of linear wetlands and riparian vegetation,”* and
- Policy 3.7.2.5f which states that *“the Land Development Plan will include methods to ensure maintenance or enhancement of indigenous biodiversity values and mitigation of adverse effects on indigenous biodiversity.”*

These will both be matters requiring consideration through any Land Development Plan process in the Ruakura Variation area, by a requirement to provide information such as a Native Fish Management Plan and Native Lizard Management Plan, and a Water Impact Assessment.

Further, small hillocks and two elevated knolls have been identified as of significance within the variation area, described in the Plan Change, Landscape and Visual Report, Boffa Miskell, June 2013, and confirmed in the evidence of Mr Goodwin, through the Board of Inquiry process for the plan change. Mr Goodwin confirmed that the Spine Road was sited so as to avoid these small hillocks to enable their retention, and this is proposed to be retained within the variation.

3.6 Valuable historical items, highly prized sites, sites of significance

Chapter 16 of the Plan covers valuable historical items, highly prized sites and sites of significance, including archaeological sites. The importance of these sites and the management of any discoveries is illustrated by the below relevant objectives from the Plan:

- Objective 16.3.1: *“Site management protocols exist to ensure a precautionary approach to site works to manage the potential for waahi tapu and taonga tuku iho discovery,”* and
- Objective 16.3.4: *“Procedures are in place to manage the discovery of taonga and archaeological sites,”* and
- Objective 16.3.5: *“The adverse effects of resource use and activity operation are managed so as to appropriately protect areas and sites of significance.”*

The PDP contains chapter 19 which covers historic heritage, including archaeological and cultural sites. Specific objectives and policies are included for example, that significant archaeological and cultural sites shall be protected from damage or destruction, and that the relationships of tangata whenua with sites of spiritual, cultural or historical significance shall be recognised and provided for. Further, the PDP already contains site management protocols to ensure a precautionary approach to site works to manage potential discoveries through Appendix 1.2.2.7 of Volume 2. This section contains requirements which are to be included in any resource consent application for sites listed in the relevant historic heritage schedules of the PDP, with advice from relevant iwi being required for sites with identified tangata whenua values. The intention of these is to ensure that sites of cultural significance are recognised and protected.

An archaeological report was prepared for Tainui Group Holdings Ltd and Chedworth Properties Ltd in 2015 (Ruakura Land Development Plan, Archaeological Assessment - Opus). The report included the land owned by TGH and CPL as well as two other private properties. This report found two archaeological features, including a 19th century sod fence and an 1880s drain. The drain has been considered eroded or destroyed, with the sod fence on the boundary of the study area. The report also noted that, due to the large scale of the area, it

is reasonably possible that archaeological material and objects will be encountered, concealed below the topsoil and vegetation. The report states that *“it is unlikely that there will be extensive remains as this part of the Waikato Basin was not favourable for long-term occupation and no previous sites have been located within the footprint”*. It is important to note that the archaeological assessment did not cover the entire variation area.

There have also been two relevant cultural impact assessments completed in the area. Cultural Impact Assessment Report Ruakura Estate, prepared by Maree Pene of Te Kotuku Whenua Consultancy, October 2011, and An Assessment of the Potential Impact that any Expansion and Development of the Ruakura Estate might have on Cultural Values and Manawhenua, prepared by Wiremu Puke of NaMTOK Consultancy Ltd, November 2011.

The report prepared by Mr Puke contains a detailed description of some pre-European history and activities. Both assessments provide recommendations for future development on the site, however are largely supportive of the proposal and recognise the changes that have occurred on the land in the area since European settlement. Some of these recommendations are around the discovery of historical items or kiwi through earthworks. As described above, the PDP contains provisions to be included on resource consents to guide such situations.

Further, a Tangata Whenua Statement of Significance for the Archaeological Assessment of the Ruakura Development Plan (2015) includes specific recommendations in relation to waahi tapu sites which is of particular relevance for this development. The TWWG will play a key role in facilitating the management of the valuable items and sites in this area.

3.7 Natural Hazards

Chapter 17 of the Plan relates to natural hazards, of which a specific natural hazards section is also included in the PDP. The Plan contains the following relevant objectives:

- Objective 17.3.1: *“Land use and the construction of structures occurs in a way that does not increase the risk or magnitude of a natural hazard event, and does not increase the risk or effects on human life or activity in the event that a natural hazard event occurs.”*

The PDP contains objective 22.2.1 to *“manage activities to avoid or mitigate adverse effects on, and minimise risk to people, property and the environment, from natural hazards, in order to increase community resilience, reduce the risks from natural hazards, and support effective and efficient response and recovery from natural hazard events.”* This objective illustrates the importance that has been placed on natural hazards in the PDP and is an example of how they respond and align with the objectives of the Plan. The objectives and policies in the PDP are applicable to development within the Ruakura Variation area.

4.0 Specific objectives and policies of relevance to the Ruakura Variation

The following identifies the specific objectives and policies of the Plan that are relevant for consideration by the variation.

4.1 Freshwater

The Freshwater chapter of the Plan contains the following relevant objectives, including one specifically addressing integrated catchment management:

- Objective 19.4.2: *“Water quality is such that fresh waters within the rohe of Waikato-Tainui are drinkable, swimmable and fishable in all places (with water quality to the level that Kiingi Taawhiao could have expected in his time).”*

- Objective 19.4.3: *“An integrated and holistic approach to management of water is achieved.”*

While the Waikato River is well beyond the Ruakura variation area, the area is within its catchment and also contains some of its tributaries. It is due to this, that the PDP and this variation incorporate more stringent requirements in relation to water than has been included previously.

In particular, it is noted that a Land Development Plan in the Ruakura Variation area is required to demonstrate how the proposal is consistent with, or otherwise complies with, the recommendations, measures and targets of any approved Integrated Catchment Management Plan (ICMP), and the information requirements for a subdivision through the PDP requires a Water Impact Assessment or ICMP to be submitted with it. A comprehensive list of requirements for an ICMP is listed in the PDP at section 1.2.2.6 of Volume 2.

Further, chapter 25.13 of the PDP covers Three Waters and specifically notes that ICMPs will be used as a tool to help manage, at a high level, the form and function of Three Waters infrastructure in an integrated, effective, efficient, functional, safe and sustainable manner.

Where an ICMP does not exist, additional policies and measures have been put in place to ensure good outcomes are still achieved. A water impact assessment is an alternative option where an ICMP does not exist, and additional policies require three waters infrastructure to minimise the effects of urban development on downstream receiving waters and groundwater, for stormwater management techniques to maintain or improve the quality of stormwater entering the receiving environment, and for wastewater to be treated and disposed of in a way that minimises effects on cultural values.

It is through these measures that the quality of stormwater from this development can be managed to ensure compliance with the water quality level necessary for Hamilton City Council to meet its Comprehensive Stormwater Discharge Consent requirements.

4.2 Land

The Land chapter of the Plan includes the following relevant objectives and policy:

- Objective 21.3.2: *“The life supporting capacity of land and soils effectively manages soil nutrient loss and water quality so there is minimal impact on nutrient loss to waterways.”*
- Policy 21.3.3: *“Promote and encourage the development and adoption of land management practices that protects waterways from suspended sediments, nutrients and pollutants.”*

The proposed development at Ruakura will incorporate logistics and industrial type development and therefore, the risk of contamination of land and water runoff from activities within these zones is acknowledged. The variation requires the use of the Land Development Plan mechanism so as to ensure integrated development occurs rather than considering development on a site by site approach. Matters such as three waters infrastructure will be considered and methods to address these matters refined. This Land Development Plan mechanism requires consideration of a number of matters, such as including the intended function of linear wetlands, greenways and gullies, details of how a development avoids, remedies or mitigates adverse effects on, or enhances, any significant habitats of indigenous fauna, and consideration of potential construction effects, for example.

Further, the following Objective is also relevant, in relation to integrated catchment management:

- Objective 21.3.4: *“Integrated catchment management occurs across the entire rohe of Waikato-Tainui, including in catchments that impact on, or flow into the Waikato-Tainui rohe. Integrated catchment management includes the effective and sustainable management of floodplains and drainage areas to promote natural habitat enhancement.”*

Integrated catchment management has been discussed in the Freshwater chapter section 4.1 above.

4.3 Air

The importance of managing air quality is highlighted in the following objective from the Plan:

- Objective 23.3.1: *“The quality and amenity of discharge to air is such that the life supporting capacity and quality of air within the rohe is retained at a level that does not compromise human health, amenity values, or property.”*

The Waikato Regional Council has responsibility for controlling discharges to air under the RMA however District Councils are able to control minor nuisance effects of smoke, fumes, odour and dust. Due to the nature of some of the proposed zones in the Ruakura Variation area, such as logistics and industrial park, the smoke, fumes, odour and dust objective 25.11.2.1 states avoid adverse effects on local amenity values and people’s wellbeing arising from smoke, fumes, odour and dust, and policy 25.11.2.1a will be relevant. These recognise the need to control these effects for both amenity and peoples wellbeing.

4.4 Land Use Planning

In the land use planning chapter of the Plan, it states that *“the strategic identification of growth cells around Hamilton City, with appropriate infrastructure provided in growth cell planning and development, is supported as it will enable the social and economic development of Waikato-Tainui and the community.”* This is the intent of the structure planning process of the Ruakura Variation as one of Hamilton’s strategic growth cells. In addition, further refinement of matters such as infrastructure provision will be undertaken prior to development proceeding through the use of the Land Development Plan mechanism.

This chapter is particularly relevant to the Ruakura variation.

- Objective 25.3.1: *“Development principles are applied to land use and development (urban and rural) and, in particular, development in new growth cells, that enhance the environment.”*

While environmental enhancement is not often possible, it is an ideal goal and should be strived for where possible. Although the variation itself encourages enhancement through many of its objectives and policies, it more often seeks management, avoidance, mitigation or remedy of the effects of a proposal. The Land Development Plan mechanism utilised for the Ruakura Variation contains requirements for a more comprehensive consideration of ecological matters than utilised outside of Ruakura. One of the requirements of an ITA required under the Land Development Plan is to include *“details of how land development avoids, remedies or mitigates adverse effects on, or where possible enhances, any significant habitats of indigenous fauna.”* Further, they also seek enhanced stormwater function through the use of proposed linear wetlands as *“an integral part of an alternative stormwater management solution”* in place of existing farm drains. The greenway is also to be utilised to *“create opportunities for improved habitat and ecological benefits in the Ruakura Structure Plan area and in downstream receiving environments.”* Land Development

Plans for the variation also require the preparation of Native Fish and Lizard Management Plans.

While it is acknowledged that the variation does not require enhancement of the environment in all situations, it moves in the direction of achieving environmental enhancement through the comprehensive requirements of this mechanism and the more ecological focus given to the Ruakura Structure Plan area.

Additionally, the following objective, policy and methods should be considered.

- Objective 25.3.2: *“Urban and rural development is well planned and the environmental, cultural, spiritual, and social outcomes are positive.”*
- Policy 25.3.2.1: *“To ensure that urban development is well planned and the environmental, cultural, spiritual, and social outcomes are positive.”*
- Method (c) of policy 25.3.2.1: *“Encourage the development and use of structure plans or similar tools for significant land use or development initiatives.”*
- Method (g) of policy 25.3.2.1: *“Land use and development of Waikato-Tainui owned land, regardless of the nature of the ownership is supported, providing such use and development is consistent with this Plan and/or the position and perspectives of those holding mana whakahaere in the area of this land use and development activity.”*

This will be assured through the proposed integrated management approach, utilising the Land Development Plan methodology to ensure a more holistic approach is followed. This will also enable various positive benefits to Waikato-Tainui and the wider community.

It is noted that structure planning has been used for the Ruakura Variation. While some of the area will be subject to its new zones immediately, other areas, for example the residential enclave bound by Percival Road, Ryburn Road and the eastern city boundary, will retain a Large Lot Residential zoning, with a structure plan zoning of logistics identified for the future.

In relation to method (g), the proposed development of the inland port and surrounding associated logistics development, as well as a large component of northern residential land, was initiated by a private plan change request by Tainui Group Holdings Ltd and Chedworth Properties Ltd. This has progressed through the Board of Inquiry planning process and has now been incorporated into the Operative District Plan 2012. The variation process will incorporate it, and the surrounding Ruakura land, into the PDP. It is understood, through the cultural impact assessment prepared by Te Kotuku Whenua Consultancy in 2011, which are the environmental agency for Ngati Wairere, that Ngati Wairere fully endorses the proposal by Tainui Group Holdings and Chedworth Properties.

From our assessment of the Plan, the variation is generally in alignment with it, by attempting to achieve the integrated development with holistic and positive outcomes for the environment.

4.5 Infrastructure

The infrastructure chapter of the Plan highlights the essential role of infrastructure in providing for the economic, social, cultural, spiritual, and environmental health and wellbeing of the community, and that this development should occur in a sustainable manner. The Plan also highlights that if possible, enhancement is a better goal than sustainability, and recognises that planning is necessary to strive to achieve this where it is possible.

A relevant objective in this chapter of the Plan includes:

- Objective 26.3.2: *“Infrastructure development, upgrade, and maintenance manages economic, social, cultural, spiritual, and environmental effects.”*

Much of the larger-scale infrastructure provision for the variation area is indicated on the structure plan map, whether it is in a fixed location or is more indicative. This higher-level infrastructure is important in ensuring the integrated and planned development of this area, and the detail of this infrastructure as well as the smaller scale infrastructure will occur through the Land Development Plan mechanism which is utilised in the variation. As part of the Land Development, many of these effects will need to be considered and assessed in the planning stages.

In relation specifically to waste, the following objective is included in the Plan:

- Objective 26.3.3: *“Liquid, solid, and hazardous waste management is best practice and manages social, cultural, spiritual, economic and environmental effects.”*

The PDP provides for hazardous facilities in chapter 25.4 and solid waste in chapter 25.12.

In relation to hazardous facilities, it is noted that an objective is included *“to protect people, property and the natural environment by avoiding or minimising the adverse effects of storage, use, disposal or transport of hazardous substances.”* The PDP places a high importance on ensuring that hazardous facilities, being a site which stores, uses, transports or disposes of hazardous substances is adequately considered.

In relation to solid waste, being domestic and commercial rubbish and any materials left over from an activity or process that are no longer viable, Hamilton City Council manages many aspects of solid waste through its Waste Management and Minimisation Plan and a bylaw. The PDP includes objectives and policies including:

- PDP Objective 25.12.2.1: *“Reduce the amount of solid waste generated and ultimately entering landfills”*
- PDP Policy 25.12.2.1a: *“Promote the reduction of solid waste volumes based on the following hierarchy: reduction, reuse, recycle, recovery, treatment, disposal”*
- PDP Objective 25.12.2.2: *“Solid waste activities and facilities are managed in a way that addresses adverse effects from the storage and disposal of solid waste.”*

The importance of sustainable solid waste principles and practices is evident through these objectives and policies, in addition to the clear emphasis on reduction of solid waste in the first instance.

In relation specifically to transportation infrastructure, the following objective and subsequent method in the Plan is applicable to the Ruakura variation:

- Objective 26.3.4: *“Transportation infrastructure is developed and managed in a manner that provides for social, cultural, spiritual, economic, and environmental needs.”*
- Method (b) of policy 26.3.4.1: *“Sustainable transport options should be incorporated into subdivision and developments including options for public transport, carpooling, walking, and cycling.”*

An Integrated Transport Assessment (ITA) is required to be provided as part of a Land Development Plan in the Ruakura Variation area, part of which requires the provision of details regarding how the development has been designed to align with the cyclist and pedestrian network plan. The cycle and pedestrian network is proposed to utilise the open space greenway and connecting gully systems to provide links to on-road cycle networks. The Land Development Plan mechanism also requires consideration of the proposal in relation to the wider growth cell and how it will sit within the strategic infrastructure surrounding it.

5.0 Summary

The Board of Inquiry process for the plan change by Tainui Group Holdings Ltd and Chedworth Properties Ltd was very thorough and incorporated information and advice from a number of specialists. This helped to guide the proposal, with the decision now being incorporated into the wider Ruakura Variation area. Wherever possible, the Ruakura Variation has incorporated the direction of the plan change. The solutions for environmentally, ecologically and culturally significant issues have therefore been carried through and reflected in the variation, to ensure the best outcome possible. These are considered to be in alignment with the Waikato-Tainui Environmental Plan – Tai Tumu Tai Pari Tai Ao. Ongoing consultation between Hamilton City Council and Waikato-Tainui through the use of working groups will continue to take a partnership approach, which is consistent with the JMA.