

**New Zealand Coastal Policy
Statement 2010**

**Summary of evaluation under
section 32 of the Resource
Management Act 1991**

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1 INTRODUCTION

Section 32 of the Resource Management Act 1991 (RMA) requires the Minister of Conservation, before issuing a New Zealand Coastal Policy Statement (NZCPS), to undertake an evaluation of the statement. The evaluation must examine the extent to which each objective is the most appropriate way to achieve the purpose of the Act, and whether, having regard to their efficiency and effectiveness, the policies are the most appropriate for achieving the objectives. The evaluation must take into account the benefits and costs of policies and the risk of acting or not acting if there is uncertain or insufficient information about their subject matter.

This report is a summary of the s32 evaluation of the NZCPS 2010. The Act does not require the Minister to prepare a report on this evaluation, in contrast to the statutory requirement for a summary report of the s32 evaluation undertaken before a proposed NZCPS is publicly notified. This summary has been prepared, however, as a convenient reference for interested parties.

A publicly available Regulatory Impact Statement (RIS) on the NZCPS 2010 also reflects the evaluation undertaken. Information contained in the RIS is not repeated here.

2 EVALUATION OF OBJECTIVES

The extent to which each NZCPS objective is the most appropriate way to achieve the purpose of the Act is assessed in terms of:

- relevance - the relationship of the objective to matters in Part 2 (purpose and principles) of the RMA, and to identified resource management issues
- achievability - the extent to which the desired outcome can be achieved with powers and resources available under the RMA
- reasonableness - the extent to which the desired outcome can be achieved with an appropriate balance of social, economic and environmental costs over time.
- usefulness - the extent to which the objective will assist decision-making and/or evaluation of effectiveness, or clearly communicate the intent of relevant policies

NZCPS 2010 objective	Relevance	Achievability	Reasonableness	Usefulness
Objective 1: safeguard the integrity, form, functioning and resilience of the coastal environment and sustain its ecosystems	Part 2 RMA: s5(2)(b) safeguard life-supporting capacity of air, water, soil, & ecosystems, s6(c) protect significant indigenous vegetation/habitats, s7(d) intrinsic values of ecosystems. Issues: development pressure, biodiversity & water quality loss, sedimentation.	Partial. Protecting representative or significant ecosystems & water quality also requires action under other Acts (e.g. marine reserves, biosecurity) and by others besides local authorities (e.g. DOC, MFish, property owners).	Environmental costs (loss of ecosystems, habitats and species, and deteriorating water quality) have predominated. More appropriate balance of costs dependent on effective implementation.	Objectives assist decision-making, particularly where multiple policies are relevant to decisions, by describing high-level outcomes sought. Description of outcomes in terms of specific coastal resource management issues will also assist development of monitoring and evaluation regime.
Objective 2: preserve the natural character of the coastal environment and protect natural features and landscape values	Part 2 RMA: s6(a) preserve natural character, s6(b) protect outstanding natural features/landscapes. Issues: loss of natural character and landscape values	Partial. Effective implementation of RMA plan provisions also requires local authority resources allocated under Local Government Act (LGA).	Environmental costs (loss of natural character) have predominated. More appropriate balance of costs dependent on effective implementation.	
Objective 3: take account of the principles of the Treaty of Waitangi, recognise the role of tangata whenua as kaitiaki and provide for tangata whenua involvement in sustainable management	Part 2 RMA: s8 Treaty principles, s6(e) Maori relationship with ancestral lands etc., s7(a) kaitiakitanga. Issues: limited recognition of Maori interests & limited opportunities for exercise of kaitiakitanga	Partial. Effective partnership with tangata whenua in resource management also requires relationship and iwi/hapu capacity building, using resources allocated under LGA, and implementation of Treaty settlements.	Imbalance of 'costs' (incl loss of cultural values) falling on tangata whenua likely to reduce only slowly due to constraints on capacity and resources for participation and exercise of kaitiakitanga.	
Objective 4: maintain and enhance the public open space qualities and recreation opportunities of the coastal environment	Part 2 RMA: s5(2)(a) needs of future generations, s6(d) public access, s7(c) amenity values. Issues: insufficient protection of open space & recreation values	Partial. Measures under RMA to maintain or enhance open space and recreation opportunities need to be complemented by funding and resources allocated under the LGA.	High & increasing economic value of private occupation of coastal space the principal risk to appropriate balance of costs being achieved. Value of public open space liable to discounting.	
Objective 5: ensure that coastal hazard risks taking account of climate change, are managed	Part 2 RMA: s5(2) social, economic, & cultural well-being, health and safety, s7(b) efficient use & development, s7(i) effects of climate change. Issues: development pressure v. increasing risk, need for strategic approach.	Partial. Effective management of coastal hazard risks also requires investment (e.g. in protection works) under LGA, and civil defence / emergency management measures (e.g. tsunami warning).	Balance of costs and benefits achievable only in long term given long life of assets at risk. Increasing economic and environmental costs in foreseeable future from hard protection works for existing development.	
Objective 6: enable people and communities to provide for their social, economic, and cultural wellbeing and their health and safety, through subdivision, use, and development	Part 2 RMA: s5(2) social, economic, & cultural well-being, health and safety, s5(2)(a) needs of future generations, s6(f) protection of historic heritage Issues: Provision for growing resource & infrastructure needs	Partial. Effective provision for wellbeing, health & safety also requires action under other legislation (eg fisheries, biosecurity, conservation, defence, civil defence, minerals, historic heritage) & central/local government implementation.	Achieved to date only with heavy discounting of environmental costs. More appropriate balance of costs dependent on effective implementation.	
Objective 7: ensure that sustainable management of the coastal environment recognises and provides for New Zealand's international obligations	Relevant to international legal responsibilities fulfilled through RMA. Issue: Implementation by local authorities under devolved RMA regime.	Partial. Wide range of statutes and regulations give effect to international obligations and require central & local government implementation.	No additional costs to any already imposed by international agreements.	

3 EVALUATION OF POLICIES

3.1 Benefits and costs – general

The extent to which policies are appropriate to objectives requires an assessment of their effectiveness and efficiency in contributing to the achievement of those objectives. Assessment of efficiency, in particular, requires consideration of costs and benefits.

The benefits of improved national policy guidance on coastal resource management under the RMA are primarily in:

- **supporting effective and efficient implementation of the law**, by providing direction on how it is to be applied and promoting national consistency and good practice in planning and consent decision making
- **providing more certainty for resource users and communities** about opportunities for and constraints on development, including by promoting clear strategic and spatial planning, and guiding decision makers on how competing national benefits and local costs of proposed activities should be weighted
- **avoiding or reducing costs**, including environmental harm and costs to resource users and communities, caused by ineffective and inefficient resource management, where poor management is due in part to shortcomings in national policy guidance.

These benefits are secured in pursuit of those the Act is designed to deliver – the social, economic, and cultural wellbeing of people and communities, availability of natural and physical resources to meet the needs of future generations, continued life-supporting capacity of air, water, soil, and ecosystems, preservation of the natural character of the coastal environment, and other matters of national importance identified in the Act.

Costs generally arising from the introduction of a new NZCPS would include:

- **implementation support** costs for central government
- **implementation costs** for local authorities, including acquisition of data needed for planning, and time and effort to develop compliant plan provisions
- **transitional costs** for all parties – resource users, community groups, councils, government – including familiarisation with new policy, and time and effort associated with interpretive disputes (which can be minimised but not eliminated by careful policy drafting and provision of non-statutory guidance)

Potential implementation costs of a new NZCPS for central government can be quantified. Other costs are not quantifiable to any useful extent.

Potential local government implementation costs vary considerably depending on the extent and quality of councils' data holdings and the state of their planning documents. Marginal costs are indeterminable, as a national policy statement imposes no new functions or responsibilities but provides national guidance on how existing functions and responsibilities are to be carried out.

Potential costs for resource users and communities depend on how a new NZCPS is interpreted and applied by councils and other relevant decision makers (e.g. the Environment Court) in relation to local planning documents and individual consent applications. Quantification is not possible in these circumstances.

3.2 Effectiveness

Effectiveness is assessed in terms of the effect of policy on coastal resource management practice, which is primarily achieved through influence on plan provisions and consent decision making, and the anticipated impact relative to the status quo. Objectives to which policies are primarily relevant are listed in bold.

Policy	Objective(s)	Effectiveness	
		Effect	Impact
1 Coastal Environment	All	Baseline for identification of coastal environment in plans and decision making	More national consistency and certainty in identifying the extent of the coastal environment for RMA purposes.
2 Treaty	2, 3, 4, 6, 7	Requirements to take account of Treaty principles through consulting and involving Maori, referring to iwi management plans, recognising customary knowledge and identifying and protecting sites and resources of particular importance to Maori	Increased uptake of good practice in incorporation of Treaty principles and Maori values in coastal resource management
3 Precautionary approach	All	Requirement to apply precautionary approach in specified circumstances	Continued application of precautionary approach where relevant in coastal environment
4 Integration	All	Requirement for integrated planning and resource management	More consistent attention to cross-boundary issues for coastal resource management
5 Statutory land	1, 2, 3, 4, 6, 7	Requirement to consider effects on coastal land/waters under or proposed for statutory protection	Supports existing and potential statutory protection measures for coastal sites
6 Activities	1, 2, 3, 4, 5, 6	Checklist of principles for coastal planning and decision making	More widespread and consistent application of basic principles for sustainable management of the coastal environment
7 Strategic planning	All	Requirement to identify in plans where particular activities and forms of development are inappropriate or will need consent, & manage cumulative effects	More strategic and spatial content in statutory planning for coastal resource use and development
8 Aquaculture	1, 2, 3, 4, 6	Requirement to recognise the potential value of aquaculture and plan for it in appropriate places	More clarity and certainty in plans regarding aquaculture opportunities and limits
9 Ports	6	Requirement to recognise the importance of ports in the national transport system and plan for their development.	More effective long-term planning for development of ports and adjacent areas
10 Reclamation	1, 2, 3, 4, 5, 6	Requirement for cautious approach to reclamation, emphasis on community needs	Approval for reclamation only where robust case is made for national or regional good
11 Biodiversity	1, 2, 3, 4, 6, 7	Requirements for managing adverse effects on indigenous threatened species and habitats	Continued or enhanced protection for coastal indigenous biodiversity through RMA mechanisms
12 Harmful organisms	1, 2, 6, 7	Requirement to control activities that pose biosecurity risks	More consistent use of RMA tools to contribute to biosecurity risk management
13 Natural character	1, 2, 3, 4	Requirement to avoid adverse effects on areas of outstanding natural character; assess natural character of region/district; recognise specified elements of natural character	More transparent and effective plan provisions for preservation (including through restoration) of coastal natural character; more consistent approach to assessing natural character
14 Natural character	1, 2, 3, 4	Requirement to identify areas and opportunities for restoring natural character and provide for this in plans	
15 Landscape	1, 2, 3, 4	Requirement to protect outstanding natural features and landscapes, identified through given criteria	More transparent and effective plan provisions for identification and protection of outstanding coastal landscapes and natural features; more consistent approach to assessing landscape values
16 Surf breaks	2, 4, 6	Requirement to protect nationally significant surf breaks identified in statement	More protection and consistency in plan provisions and through consent processes for surf breaks of national value for recreation
17 Historic Heritage	2, 3, 4, 6	Requirement to identify and assess coastal historic sites, incl. with tangata whenua, and apply specified approaches to protection	More comprehensive and effective protection for coastal historic heritage through plans and consent process
18 Public open space	2, 3, 4, 6	Requirements to provide in plans for open space, considering specified needs, and to recognise open space value of esplanade reserves and strips	More strategic statutory planning for maintenance and enhancement of public open space in the coastal environment
19 Walking access	1, 2, 4, 6	Requirement to maintain/enhance public walking access to and along coast,	More substantial and consistent provision in plans and through the consent process

Policy	Objective(s)	Effectiveness	
		Effect	Impact
		considering specified effects and needs, and restrict public access only where justified by specified criteria	for public walking access and a continued cautious approach to access restrictions
20 Vehicle access	1, 2, 4, 6	Requirement to apply plan controls to vehicle access, considering specified effects and social / economic needs	More widespread application of plan provisions as part of broader approach to managing effects of vehicle use on the coast, especially beaches
21 Water quality	1, 2, 3, 4, 6	Requirement to give priority to enhancing degraded water quality where significant adverse effects on values/uses (including aquaculture, recreation)	More identification in plans of key areas for improving coastal water quality and increased application of relevant controls and conditions
22 Sedimentation	1, 2, 6	Requirement to assess and monitor sedimentation, avoid significant increases from development activities	More consistent application of plan controls to address sediment release, and monitoring conditions on consents
23 Discharges	1, 2, 3, 4, 6	Requirements to: minimise mixing zones and their adverse effects; not allow direct discharge of human sewage to coastal waters without treatment, and consult on any discharge of treated sewage; manage adverse effects of stormwater discharges, and control discharges from ports and other marine facilities	More consistent minimisation of mixing zones; continued retreat from discharge of raw sewage; increased use of plan controls and consent conditions to manage stormwater discharges; continued control of discharges from port and marine service sites
24 Hazard identification	5, 6	Requirements to identify hazard areas, assess risk over 100 years, consider specified factors including climate change effects	Continued development of hazard zone identification in plans, with more consistent use of longer time horizon and regard to climate change impacts
25 Hazard risk areas	1, 2, 5, 6	Requirement to avoid increasing risk of harm/loss from hazards, including through redevelopment or change in land use	Continued shift from predominant focus on protection works to 'portfolio' of strategies for reducing hazard risk for both new development and existing assets at risk.
26 Natural defences	1, 2, 5, 6	Requirement to protect/restore/enhance natural defences against hazards, where appropriate	
27 Hazard strategies	1, 2, 5, 6	Requirement to consider full range of strategies for protecting development at risk, including managed retreat, status quo and hard works where needed for infrastructure	
28 Monitor & review	All	Requirement for Minister to monitor and report effects of policy, review within 6 years of gazettal	Collation of data on policy impact to inform future policy development.
29 RCAs	6	Requirement to remove definitions of restricted coastal activities from regional coastal plans	Simplification of consent process for subset of coastal permit applications.

3.3 Efficiency

Efficiency is assessed by identifying the costs and benefits of policies. The assessment summarised here is qualitative. Policies are addressed in thematic groups.

Theme	Policies	Objectives	Costs	Benefits
Administration and implementation	1, 2, 3, 4, 5, 28, 29	All	Implementation and administration costs for central and local government. Engagement costs for iwi and hapu, depending on existing levels of consultation. Plan change costs for removal of restricted coastal activity definitions from plans.	More clarity and consistency on scope of coastal environment, good practice in engagement with Maori and requirements of integrated resource management. Simpler and cheaper process for coastal permit applications that will no longer be for restricted coastal activities). Support for development of information base for future policy development.
Strategic and spatial planning	3, 4, 5, 6, 7, 8, 9, 13, 14, 15, 16, 17, 18, 19, 20, 21, 24, 25, 26, 27	All	Plan development costs for councils and participants in plan processes. Some activities and forms of development constrained in some places, including where adverse cumulative effects have become or are becoming critical. Monitoring costs for consent holders where relevant.	Less 'backfilling' of planning costs in consent processes. More certainty for consent applicants and communities about where resource use & development can occur or is likely to raise significant issues, and where certain activities unlikely to proceed. More effective management of cumulative effects.
Aquaculture and ports	8,9	1, 2, 4, 6	Costs for participants in plan process (including industry, interest groups, communities). Plan costs for councils (depending on extent of existing information) to assess and consider transport infrastructure needs relating to port use and development.	Promotes planning for aquaculture, incl. consideration of economic benefits & management of adverse effects on aquaculture areas. States national interest in port development & integration with other transport modes. Helps avoid reverse sensitivity problems for ports.
Natural character, features and landscapes	13, 14, 15, 16, 17, 18	1, 2, 3, 4, 6	Plan costs where councils have not done enough assessment of natural character, landscapes and significant natural features. Stronger plan constraints on development activities affecting outstanding landscapes and significant natural features, and in places with outstanding natural character.	More certainty for consent applicants and communities about where impacts on landscapes, significant natural features, and natural character will be a significant issue for development, and where that is less likely. More effective protection of outstanding coastal landscapes & features.
Ecological integrity	10, 11, 12, 13, 14, 15	All	Planning and administration costs for central and local government where there are gaps in base data on environmental quality. Constraints on use and development activities that would have unacceptable adverse effects on important ecological values.	More effective protection through RMA mechanisms for declining coastal indigenous biodiversity, including through increased attention to management of adverse effects on threatened and at risk species and habitats.
Water quality	21, 22, 23	1, 2, 3, 4, 6	Planning costs where water quality data is lacking and priorities not already identified. Monitoring costs for councils and some consent holders. Constraints on some forms of land use where causing sedimentation problems. Infrastructure costs to improve discharge quality over time.	More recognition and management of coastal water quality issues, including sedimentation and stormwater discharges. Increased assurance of water quality necessary for aquaculture, recreational and cultural uses, and preservation of natural character.
Coastal hazard risks	24, 25, 26, 27	1, 2, 5, 6	Risk assessment costs for councils, depending on work already done. Loss of value for properties within hazard zones. Reduction in development opportunities on land at risk. Environmental harm where new protection works proceed. Loss of assets at risk if managed retreat is best option.	Clearer, more thorough, more consistent identification of coastal hazard risks in plans. More use of 100 year risk horizon. Increased focus on risk management, more flexibility in range of possible responses. More use of less environmentally damaging protection options where practicable.
Maori interests	2, 4, 6, 7, 11, 15, 17, 18, 19, 20, 21,23	All	Increase in planning, research and consultation costs for councils if and where engagement with tangata whenua is lacking. Costs highly dependent on the quality of existing information and relationships.	Promotes effective recognition of Treaty relationship in coastal resource management processes, supports council initiatives to deal with RMA responsibilities to Maori. Better recognition and protection of coastal places and resources important to Maori.
Public access	18, 19, 20	1, 2, 3, 4, 6	Planning costs where base data on access and open space (e.g. mapping) is lacking and public access issues including vehicle access not sufficiently assessed. Variable implementation & enforcement costs depending on approach.	Promotes effective planning to satisfy high public expectations of access and public open space on and near the coast, incl. priority setting for improvement of access. Support for planning as part of integrated management of vehicle use on beaches.

3.4 Key areas of change

The policy areas in which the NZCPS 2010 would make the most significant change relative to the NZCPS 1994 can be summarised as:

- Strategic & spatial planning for development
- Planning for aquaculture and ports
- Preserving natural character and protecting outstanding natural features and landscapes
- Enhancing degraded water quality and managing sedimentation
- Managing coastal hazard risks
- Identifying & protecting sites and resources of particular importance to Maori
- Maintaining public access and controlling vehicles on beaches

The policy changes and their likely costs and benefits are discussed in the following sections.

3.4.1 Strategic & spatial planning for development

The NZCPS 2010 has more specific and directive policy than the NZCPS 1994 on strategic and spatial planning for development. Councils already have planning responsibilities, but approaches and plan quality are variable. The NZCPS 2010 includes explicit directions to councils to:

- identify threats from cumulative effects (e.g. areas where water quality is degraded or under threat from multiple discharges) and apply plan controls in response (e.g. thresholds, zones, targets)
- plan for development, applying specified principles (e.g. considering the relationship between development and population growth, consolidating settlement patterns to avoid sprawl, taking account of potential renewable energy sources)
- identify in plans where particular activities and forms of development are inappropriate or will need to be assessed through the consent process.

Costs	Benefits
<p>Plan development costs for councils, depending on extent of strategic planning already done, and in research and analysis costs for participants in plan processes. Some activities and forms of development constrained in some places, including where adverse cumulative effects have become or are becoming critical. Monitoring costs for consent holders where relevant.</p>	<p>Clearer plans giving more certainty about scope for, and constraints on, use and development of coastal resources. Less ‘backfilling’ of planning costs in consent processes. More certainty for consent applicants and communities about where resource use & development can occur or is likely to raise significant issues, and where certain activities unlikely to proceed. More effective responses to problems arising from cumulative effects (e.g. water quality deterioration).</p>

3.4.2 Planning for aquaculture and ports

The NZCPS 2010 includes policies specifically on management of aquaculture and ports. There are no such policies in the NZCPS 1994.

The aquaculture and ports policies direct councils and other decision makers to:

- recognise the potential value of aquaculture and plan for it in appropriate places
- take account of any available economic assessments of national and regional economic benefits
- ensuring that development does not make water quality unfit for aquaculture in areas approved for it, and ensure efficient use of aquaculture space
- recognise the importance of ports in the national transport system
- provide in plans for port operations and the integration of ports with other parts of the transport system
- ensure port operations and development are not adversely affected by other development.

Costs	Benefits
Costs for participants in plan process (including industry, interest groups, communities). Could prompt some applicants to invest more in assessment of economic benefits. Plan costs for councils (depending on extent of existing information) to assess and consider transport infrastructure needs relating to port use and development.	Promotes planning for development of aquaculture, consideration of economic benefits, management of activities with potential adverse effects on existing and new aquaculture areas, and efficient use of aquaculture space. States national interest in port development, long term viability and effective integration with other transport modes. Helps avoid reverse sensitivity problems for port operations.

3.4.3 Preserving natural character, protecting outstanding natural features and landscapes

The NZCPS 2010 is more directive than the NZCPS 1994 in requiring councils to assess the natural character of their region or district and identify outstanding landscapes. Policy includes guidance on key elements of natural character and criteria for assessing landscape, based on case law and established practice. Policies also provide direction on management of effects on natural character and outstanding landscapes, restoration of natural character where appropriate, management of effects on coastal biodiversity and protection of listed nationally significant surf breaks.

Costs	Benefits
Plan costs where councils have not done enough assessment of natural character, landscapes and significant natural features. Stronger plan constraints on development activities affecting outstanding landscapes and significant natural features, and in places with outstanding natural character.	More certainty for consent applicants and communities about where impacts on landscapes, significant natural features, and natural character will be a significant issue for development, and where that is less likely. More effective protection of outstanding coastal landscapes and significant natural features.

3.4.4 Enhancing degraded water quality and managing sedimentation

The NZCPS 2010 provides more explicit direction than the NZCPS 1994 to local authorities and decision makers to identify where coastal water quality is degraded and should be enhanced. This would require councils to identify degraded water quality and develop appropriate policies or rules to improve it, recognising that efforts will have to be spread over time and prioritised to make best use of available resources.

There is more explicit guidance on the management of mixing zones for discharges. Policy against discharge of untreated human sewage to sea is not changed in effect but terminology is updated. guidance is provided on management of stormwater, which was not addressed in the NZCPS 1994. The NZCPS 2010 also gives explicit direction on assessing, monitoring and managing sedimentation, which is not addressed in the NZCPS 1994. This would require more monitoring and assessment by councils of sedimentation, development of policies and probably rules in plans for managing it, and conditions on resource consents where relevant.

Costs	Benefits
Planning costs where opportunities and priorities for enhancing water quality and managing sedimentation have not already been identified and/or information on values and uses is insufficient. Monitoring costs for councils, and for consent holders where relevant. Constraints on some forms of land use (e.g. vegetation clearance) where they would exacerbate sedimentation problems. Infrastructure investment to improve quality of discharges where relevant.	Promotes better recognition and management of coastal water quality issues, including sedimentation and stormwater discharges. Increased assurance of water quality necessary for aquaculture, recreational and cultural uses, and preservation of natural character.

3.4.5 Managing coastal hazard risks

The NZCPS 2010 provides more specific direction than the NZCPS 1994 to local authorities and decision makers on managing coastal hazard risks. This includes:

- identifying hazard areas, assessing risk over 100 years
- avoiding increasing the risk of harm or loss from hazards, using a range of approaches including alternatives to hard protection works
- considering a full range of strategies for protecting existing development, including managed retreat, status quo and hard works where necessary.

Local authorities already have responsibility for identifying and managing hazard risks but the proposed policy would increase pressure on councils to acquire hazard risk data and develop relevant plan provisions.

Costs	Benefits
<p>Risk assessment costs for councils in plan development, varying depending on extent of work already done. Loss of value for properties identified as being within hazard zones and reduction in development opportunities on land at risk. Adverse environmental effects and long term maintenance costs where new protection works proceed. Loss of some existing development where managed retreat is best option.</p>	<p>Clearer, more thorough, more consistent identification of coastal hazard risks in plans. More consistent use of 100 year time horizon, reducing inappropriate discounting of longer term risks. Increased focus on risk, more detailed guidance for local authorities and consent decision makers, more flexibility in range of possible approaches to risk reduction. More use of less environmentally damaging protection options where practicable. Avoided long term costs for unjustified hard protection works. Full range of options for protecting significant infrastructure, including for approaches such as managed retreat that reduce risk and long-term costs.</p>

3.4.6 Identifying & protecting sites & resources of particular importance to Maori

The NZCPS 2010 provides more specific direction than the NZCPS 1994 to local authorities and decision makers on the identification and protection of coastal sites & resources of particular importance to Maori. It requires them to consider specified range of possible approaches and methods to achieve this. Elements of the NZCPS 1994 that effectively repeated RMA provisions are not retained.

The new statement would maintain national policy pressure on councils to support Maori participation in plan and consent processes and engage with tangata whenua to identify culturally important places and resources and develop appropriate policies or rules to protect them. Maori interests in developing papakainga and marae are expressly recognised.

Costs	Benefits
Increase in planning, research and consultation costs for councils if and where their engagement with tangata whenua is insufficient. Costs will be highly dependent on the quality of existing information and relationships.	Promotes active and effective recognition of Treaty relationship in coastal resource management processes, supports council initiatives to deal with RMA s7 and s8 responsibilities. Better recognition and protection of coastal places and resources important to Maori. Recognition of Maori communal development needs in planning.

3.4.7 Maintaining public access and controlling vehicles on beaches

The NZCPS 2010 is more specific than the NZCPS 1994 in addressing public access to and along the coast, identifying walking access as a fundamental requirement and expressly addressing the management of vehicles on beaches. There is also more specific direction on planning for community needs for open space, considering specified needs and pressures including where climate change and erosion combine to ‘squeeze’ public space on the coastal margin.

RMA planning for the management of vehicles on beaches is only one element of addressing that issue, which is increasingly approached using a range of tools (e.g. including bylaws and non-regulatory measures) and collaboration (e.g. with Police on enforcement).

Costs	Benefits
Plan development costs where base data on access and open space (e.g. mapping) is lacking and public access issues including vehicle access have not been sufficiently assessed. Variable implementation & enforcement costs depending on the approach taken.	Promotes effective planning to satisfy high public expectations of access and public open space on and near the coast. Direction for local authorities on priority setting for improvement of public access, to assist planning. Promotes use of planning tools as part of integrated approach to managing vehicle use on beaches.

3.5 Implementation

3.5.1 Timing

The RMA requires local authorities to amend policy statements and plans to give effect to the NZCPS. This would be undertaken as part of the normal process of plan review and would occur over several years, according to when plan reviews are scheduled by relevant local authorities. Plan reviews are undertaken following a process set out in Schedule 1 of the RMA, involving public notification and consultation.

An exception to implementation in plans through the normal review process would be the removal of Restricted Coastal Activity (RCA) provisions from operative regional coastal plans. These provisions are in plans to give effect to the NZCPS 1994, but are not required by the NZCPS 2010. In accordance with Policy 29 (Restricted Coastal Activities) in the NZCPS 2010, RCA provisions would be removed from operative plans without the need for a Schedule 1 process, as enabled by section 55(2) of the RMA.

The NZCPS would be relevant to consideration of resource consents and other relevant approvals as soon as it was gazetted.

3.5.2 Support

The effectiveness of the NZCPS 2010 will depend significantly on the level of support provided by central government for local government implementation. A basic implementation support programme could include guidance notes on coastal planning topics (delivered through the Quality Planning website) and a roadshow and/or workshops for council planning staff, councillors, consent commissioners on the new policy statement. A more substantial implementation package could include, additionally, development of standard methodologies for matters such as landscape and natural character assessment, and central government funding for - or collaboration with - local authorities to address baseline data gaps (e.g. water quality information, biodiversity data).

The Department of Conservation will be responsible for implementation support, collaborating with local authorities to set priorities for an implementation programme. The estimated cost of a basic NZCPS implementation programme is approximately \$1.1 million, spread over up to 5 years. A more substantial implementation package could cost at least a further \$1.5 million.

3.5.3 Transitional costs

Questions of interpretation inevitably arise from new policy. Central government, local government, resource users and others engaged in coastal resource management issues (e.g. non-governmental organisations, community groups) incur costs for legal and resource management professional advice on such questions, including litigation costs in some cases. Costs diminish as key interpretive questions are settled through converging professional practice and case law.

3.5.4 Monitoring, evaluation and review

Under Policy 28 of the NZCPS 2010 the Minister of Conservation would be responsible for monitoring and reviewing the NZCPS. This would include:

- assessing the effect of the NZCPS on regional policy statements, plans, resource consents, and other decision making;

- in collaboration with local authorities, collecting data for a nationally consistent monitoring and reporting programme, incorporating district and regional monitoring information as far as practicable;
- undertaking other information gathering or monitoring that assists in providing a national perspective on coastal resource management trends, emerging issues and outcomes.

The policy also provides for the Minister to publish a report and conclusions on these matters within six years of the gazettal of the NZCPS 2010.