Stakeholder Engagement Plan - Raglan WWTP Consenting

Prepared for Waikato District Council and Watercare Services Ltd (Client)
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16 April 2019

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Waikato DISTRICT COUNCIL
Te Kaunihera aa Takiwaa o Waikato

Revision History

Revision Nº	Prepared By	Description	Date
1	**Stephanie Dean**	Draft Report	16/04/2019
3	Stephen Howard	Edits allowing for finalisation	14/05/2019

Document Acceptance

Action	Name	Signed	Date
Prepared by	**Stephanie Dean**		05/11/2019
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1 Introduction

The purpose of this engagement strategy is to set out a clear framework for developing and managing engagement and relationships with iwi, other key stakeholder and the community regarding required Raglan wastewater discharge consenting. The strategy aims to guide the process and implementation of stakeholder and community engagement so that:

- appropriate stakeholders are kept informed and provided with feedback and practical decision making opportunity in respect to treatment options, and;
- ultimately, stakeholders can be supportive of the collaborative methods utilised, where an aspirational goal will be that on balance, project outcomes (treatment option) are satisfactory to all involved.

The strategy identifies and describes the principles and objectives for engagement, the process and proposed methods, and provides direction for undertaking engagement throughout the project. This includes:

- identification of likely groups who will be engaged (there maybe others), and;
- responsibility/likely timing for engagement of engagement.

The strategy is a living document which will be added to and updated (as required) throughout the duration of the project. This will facilitate flexibility and adaptability in the engagement process, in order to respond to the specific needs of the applicant, stakeholders, iwi and community. It is noted that as a result, alternative and/or additional stakeholders and methods may be identified and utilised in the course of delivering the Project. It has been developed in accordance with International Association for Public Participation (IAP2) best practice. In the obtaining of a new discharge consent, the applicant seeks to ensure value with the community through a range of forums and information channels.

2 Project Background

Waikato District Council (WDC) currently hold a costal discharge permit for the Raglan wastewater treatment plant (WWTP) providing for the discharge treated wastewater into the Raglan Harbour by way of an outlet that is approximately 50m in length. Upon permit expiry (Feb 2020), WDC will require a new consent allowing lawful operation of the WWTP. The existing consent has a 15-year duration, determined by way of Environment Court decision. A series of treated wastewater land disposal investigations were undertaken by WDC as part of application optioneering in 2002, however this method was not considered feasible at that time. Ultimately maintaining an existing short harbour outlet with an upgrade of the WWTP (including UV disinfection) was the treatment method given consent.

The treated wastewater discharge method to the harbour is an acknowledged sensitive point for the community and iwi due to environmental, social and cultural aspects. The harbour is an important identifying feature for Raglan, and is used by locals and the tourist alike, for recreation, sea food gathering and other well-beings.

2.1 Engagement Framework

The following sections provide an overview of the legislative framework in which engagement will be undertaken.

2.1.1 Resource Management Act 1991 (the Act)

Best practice suggests that for this project, consultation and engagement is necessary in order to understand stakeholder and community opinion and to identify matters of concern, and where practicable, address these through the option selection, design and mitigation of environmental effects process. Undertaking effective engagement will therefore strengthen applications under preparation.

2.1.2 National Coastal Policy Statement

The New Zealand Coastal Policy Statement (NZCPS) is a national policy statement under the Act. The purpose of the NZCPS is to state policies in order to achieve the purpose of the Act in relation to the coastal environment of New Zealand. The following two policies under the NZCPS will be relevant for the engagement of this Project to inform the consent application process.

Policy 2: The Treaty of Waitangi, tangata whenua and Māori

1. *In taking account of the principles of the Treaty of Waitangi (Te Tiriti o Waitangi), and kaitiakitanga, in relation to the coastal environment:*

    a. *recognise that tangata whenua have traditional and continuing cultural relationships with areas of the coastal environment, including places where they have lived and fished for generations;*

    b. *with the consent of tangata whenua and as far as practicable in accordance with tikanga Māori, incorporate mātauranga Māori[1] in regional policy statements, in plans, and in the consideration of applications for resource consents, notices of requirement for designation and private plan changes;*

    c. *take into account any relevant iwi resource management plan and any other relevant planning document recognised by the appropriate iwi authority or hapū and lodged with the council, to the extent that its content has a bearing on resource management issues in the region or district; and*

        i. *where appropriate incorporate references to, or material from, iwi resource management plans in regional policy statements and in plans; and*

        ii. *consider providing practical assistance to iwi or hapū who have indicated a wish to develop iwi resource management plans;*

    d. *provide for opportunities for tangata whenua to exercise kaitiakitanga over waters, forests, lands, and fisheries in the coastal environment through such measures as:*

        i. *bringing cultural understanding to monitoring of natural resources;*

        ii. *providing appropriate methods for the management, maintenance and protection of the taonga of tangata whenua;*

Policy 23: Discharge of contaminants

iii. *Objectives, policies and rules in plans which provide for the discharge of treated human sewage into waters of the coastal environment must have been subject to early and meaningful consultation with tangata whenua.*

2.1.3 Marine and Coastal Area (Takutai Moana) Act 2011 (MACAA)

This act takes account of the intrinsic, inherited rights of iwi, hapū, and whānau, derived in accordance with tikanga and based on their connection with the foreshore and seabed and on the principle of manaakitanga. It translates those inherited rights into legal rights and interests that are inalienable, enduring, and able to be exercised so as to sustain all the people of New Zealand and the coastal marine environment for future generations. All parties with an interest in the Raglan Harbour under MACAA will need to be engaged with at a involve and collaborate level.

2.1.4 Waikato-Tainui Environmental Management Plan (EMP)

The EMP was published in August 2013, the overarching purpose of which is to provide a map or pathway that will return the Waikato- Tainui rohe to the modern-day equivalent of the environmental state that is was when Kiingi Taawhiao composed his maimai aroha.

In terms of consultation, the EMP encourages early involvement of Waikato-Tainui through pre-application meetings, meetings with the applicant and local authorities and through the review of draft or initial documents prepared by the applicant.

3 Project Scope

3.1 Project Location

The Raglan WWTP is located off Wainui Road, Raglan. The wastewater discharges into the Raglan Harbour adjacent to Riria Kereopa Memorial Drive.

Figure 1: Raglan WWTP and Discharge locality map (Google Earth)

3.2 Project Scope

The project scope is to obtain resource consent for the operation of and disposal of treated effluent from the Raglan WWTP so the consent holder can continue to lawfully operate the plant.

3.3 Communications Purpose

The applicant recognises the need to manage relationships well. To do that, communication objectives are to:

- clearly communicate the project's purpose, objectives, benefits, and progress, ultimately increase public awareness.
- carefully manage stakeholder expectations and plan any activities to minimise disruption to the environment and the community.
- keep the community informed, address their concerns in a timely and considered way and use their input to help guide decisions.
- educate members of the project team so that they understand the importance of, and make a commitment to, good engagement and communication.

3.4 Engagement Scope

The engagement scope is to inform stakeholders, iwi and the community that Council is seeking new discharge consents, and within this process, will engage with its community to understand the importance of the harbour environment and expectations for wastewater treatment methods. Anticipated outcomes are to:

- build and maintain effective and constructive relationships with all stakeholders;
- engage and communicate with all stakeholders and the community proactively and in an open and honest manner, so that there are 'no surprises';
- provide opportunities for stakeholders and the community to have input/give feedback (as appropriate) and respond in a timely manner, with reasons, and;
- conform to all statutory requirements and obligations.

4 Engagement Purpose and Goals

The following table outlines the key purposes for undertaking engagement, what the engagement goals are and success criteria to measure whether these goals have been achieved.

Purpose	Goal	Success Criteria
Identify a problem/opportunity to address	To create understanding of the existing issues with the Project and the consequences of these issues, as well as the opportunities and potential to	Engagement Partners readiness to communicate emerging problems and opportunities. Reach - identified Engagement Partners obtain information.

Purpose	Goal	Success Criteria
	address these issues. Identify issues raised by Engagement Partners with alternatives being considered.	Diverse range of ways to communicate with WDC. Capacity within WDC and Project team to respond to Engagement Partners input and communication in a timely way.
Understand reactions and implications or consequences of different methods.		Representation – adequacy and diversity of representation across the Engagement Partners. Understanding of Engagement Partners perspectives. Value-added feedback provided from Engagement Partners.

4.1 Project Context

Project context is best described as the setting or environment in which the Project is being undertaken and is key to ensuring the engagement design is appropriate. Context in this instance is shaped by community and organisational factors.

4.1.1 Community factor

Engagement with the Raglan community regarding the wastewater treatment has been ongoing for a number of years through previous consenting processes. Raglan is known for being a passionate and engaged community who value the environment and sustainable management.

General community engagement would have taken place during the development the last consent application. As a result, there is a risk of some people feeling like their feedback has not been heard previously. This is particularly important when engaging with iwi considering their appeal at the Environment Court where they made their views clear on environmental and cultural expectations.

In order to address this matter and ensure that adequate value-added collaboration is provided where appropriate, a genuine approach for engagement for the project at its current stage is required. It will be beneficial to allow previous history and issues to be aired first if needed so the focus can then be on moving forward with the current engagement scope.

The project team will initially hold a workshop with iwi and Waikato Regional Council to inform and engage on the project and current concept design options, this initial workshop will act as an appropriate tool to allow previous issues to be heard, this is explained further in *Section 8 Methods*. Engagement with the wider community and stakeholders will follow. For this project, WDC may consider setting up dedicated community liaison groups to actively connect with stakeholders and communities, with a view to minimising any affects or disruption. This will also allow the contrasting values of different sections of the community to be brought into sharp focus.

Working with Māori on their cultural concerns, such as waterways as food baskets, will help the project team establish culturally-aligned options that benefit everyone.

4.2 Project Objectives

The project output will be the renewal of the consent for the Raglan WWTP to operate lawfully, with appropriate and acceptable solutions. The project is a priority for WDC and Watercare in order to ensure achievement of the following objectives:

- Keep communities healthy;
- Protect the environment, particularly water quality and ecology of the Raglan Harbour.
- Recognise the significance of Raglan Harbour to Manawhenua and provide for culturally-aligned objectives.
- Retain flexibility for future, sustainable, long-term solutions.

As part achieving the above objectives, the project team will meet WDC's Significance and Engagement Policy, endeavouring to:

- develop a broad base of support from the public, key stakeholders and Tangata Whenua;
- propose mitigation/treatment for the environmental effects of the preferred option to the extent that would be considered no more than minor under the RMA processes, in a manner that avoids, minimises and mitigates adverse environmental, cultural and social effects;
- demonstrate that engagement feedback and collaboration has been taken into account and influenced the final application.

5 Stakeholder, Community and the IAP2 Spectrum

Key to the success of this project is understanding the stakeholders and community to be engaged with (Engagement Partners). One way to gain this understanding is to group Engagement Partners by the roles that they play and the potential influence that they have on the Project.

In this instance:

- WDC will lead all engagement and will be supported by the Project team;
- The "Partners" and "Internal Organisation" are those that have a vested interest in the Project that is greater than the general public and potentially have greater influence over Project outcomes; and\
- The "Public" and "Advocacy Groups" includes the general public and other interested parties, businesses and groups that have an interest in the Project, want to be kept informed and provided with an opportunity to participate in engagement.

The IAP2 spectrum of public participation will be used the guide the engagement approach with each stakeholder group. At a general level, the Project team will 'inform', 'consult', 'involve' and 'collaborate' with key stakeholders and iwi, whilst we consider it is more appropriate to engage with the wider community at the 'inform', 'consult' and 'involve' levels of the participation spectrum.

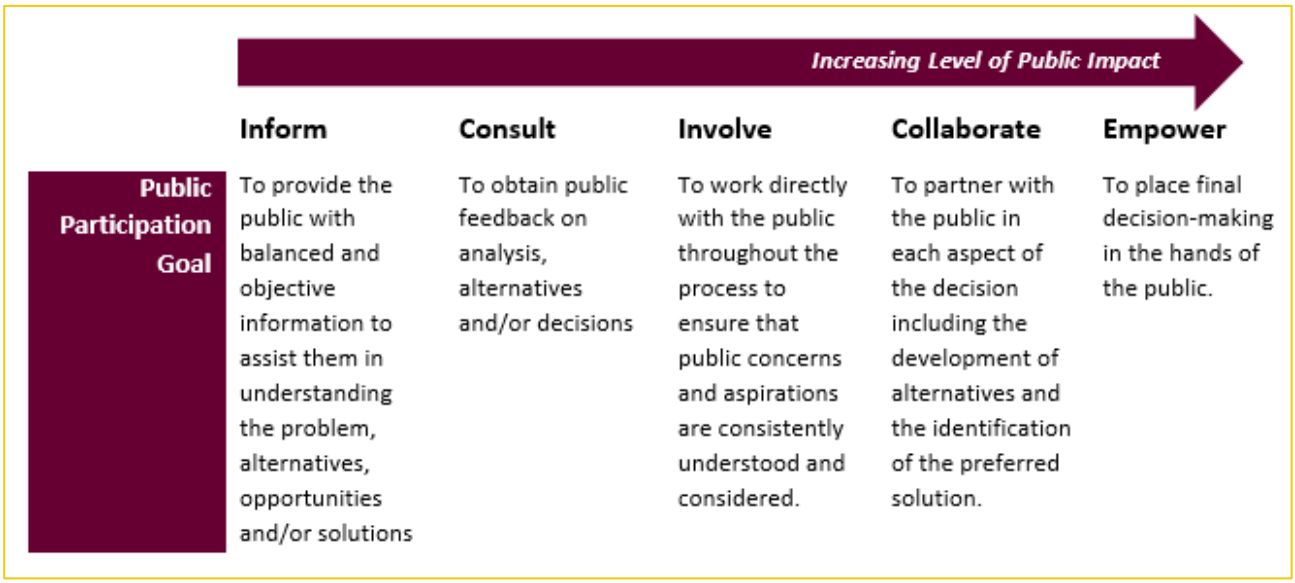

Figure 2: IAP2 - Spectrum for Public Participation

5.1 Stakeholder and Community Identification

Previous sections of this Plan have provided a basis to identify stakeholders and the community, by outlining the scope and the context of the Project.

For this Project, the following diagram categorises stakeholders into broad areas of interest.

Figure 4.2 Raglan WWTP Consenting Stakeholder Mapping (indicative)

- WDC Staff
- WDC Iwi Liaison representative
- Consultants engaged to deliver the project
- Watercare

Engagement Leaders

- Waikato Tainui
- Tamainupo
- Ngaati Mahanga
- MACAA parties

Key groups supporting or co-hosting engagement

People who live in the area or who are interested in the Project

- Local MP's
- Raglan Community
- Rate Payers
- Raglan Community Council
- Raglan Community Board (Chair: Mr Bob MacLeod)

Key groups with an interest or specific existing point of view

- Friends of Wainui Reserve
- Whaingaroa Environmental Defence Inc.
- Xtremewaste (Rick Thorpe)
- Waikato Regional Council
- Fish and Game NZ
- Department of Conservation

Taking the engagement partners listed above in Figure 4.2 and the level of engagement anticipated with those Engagement Partners, Table 1 below provides this information as a checklist that can be used to easily identify the level of engagement we propose with each listed Engagement Partner.

Table 1 Engagement Partners and Level of Engagement Checklist

Engagement Partners	Level of Engagement
Stakeholders	
Internal	
WDC Staff	Involve and Collaborate
WDC Iwi Liaison representative	Involve and Collaborate
Consultants engaged to deliver the project	Involve and Collaborate
WaterCare	Involve and Collaborate
Partners	
Waikato Tainui	Involve and Collaborate
Tamainupo	Involve and Collaborate
Ngaati Mahanga	Involve and Collaborate
MACAA parties	Involve and Collaborate
Advocary groups	
Friends of Wainui Reserve	Involve and Consult
Whaingaroa Environmental Defence Inc.	Involve and Consult
Xtremewaste	Involve and Consult
Waikato Regional Council	Involve and Consult
Fish and Game NZ	Involve and Consult
Department of Conservation	Involve and Consult
Wider Community	
Wider Public	Inform and Consult
Community boards	Inform and Consult
Local MPs	Inform and Consult

6 Key Issues

Based on the analysis and investigations carried out to date, the following are the key issues that the engagement plan will address.

6.1 Tangata Whenua and Community Partnership

Raglan iwi and local community have voiced their concerns about the discharge of Raglans treated wastewater entering the moana. Cultural aspects for iwi and practical reasons for WDC have been discussed on numerous occasions. The engagement process between the two parties has been positive and ongoing dialogue will hopefully come to a mutual and encouraging outcome.

6.2 Funding and Suitable Alternative Discharge Options

Clear messaging around what can be influenced on the project is highly important, this will manage the expectations of those being consulted with and help build a trusting relationship with WDC. The project and possible outcomes will be constrained by available funding. The land disposal method which is known from previous consultation efforts as favourable, has various land availability and suitability issues. Further investigations on land disposal are being undertaken however outcomes will not be finalised in time for the start of engagement. Careful messaging on the ability and timing of land disposal should be thought out by the project team prior to any engagement and remain consistent.

7 Engagement Methods

The following table outlines available engagement methods that could be implemented for stakeholders and the wider community, and the expected outcomes of each method. Following Table 2, a more-in-depth description of each engagement method is provided along with detail on how any selected methods and feedback obtained can then be evaluated.

Table 2 Engagement Methods

Engagement Method	Target Group	IAP2 level of participation	Reason for Method	Expected outcomes
Newsletters	Wider Community	Inform	Quick way to disseminate key information to a wide audience.	Information shared community-wide by using multiple, targeted platforms. Material is distributed through all known media platforms
Media Releases	Wider Community	Inform	Quick way to disseminate key information to a wide audience.	
Social Media	Wider Community	Inform	Quick way to disseminate key information to a wide audience.	
Open Days	Wider Community	Inform & Consult	Provides a 'people element' to engagement, an easy way to distribute information and an opportunity for	A broad cross section of the community seek and provide information about the Project by engaging with staff and provided

			participants to ask questions.	materials. Feedback about the Project is collected from members of the community.
One-on-one Meetings	Stakeholders and Iwi	Involve & Collaborate	Builds trust and shows engagement is genuine. Allows the WDC to explore and resolve key issues with stakeholders.	Selected stakeholder representatives engage with the Project, and are willing to identify, discuss, and seek to resolve sensitive issues
Workshops	Stakeholders and Iwi	Involve & Collaborate	Allows an in-depth understanding of key issues, perceptions and constraints to inform option selection.	Selected stakeholder representatives engage with the Project; are willing to engage in discussion and debate; and come to a shared understanding of issues and constraints around option selection.

The project team will be outlining the timing of engagement for this Project as appropriate.

7.1 Newsletters and Media Releases, and Social Media

Newsletters, and media releases may be used to disseminate project information informing the wider public of upcoming open days and alternative ways to engage with the project team. These methods are effective at reaching a wide audience in a short space of time. Raglan has an established local paper and online news platform which may be utilised if appropriate, to inform the wider public on project news and events.

WDC established social media platforms may be used as an easy and quick way to convey information regarding the project. This method may provide an opportunity for people to ask project related questions or post comments and ideas. This method of engagement will require moderation and frequent oversight by the WDC communications team to enable responses to be captured.

7.2 Open Days

Open days can provide important learning opportunities for interested members of the public as well as providing a forum for people to raise concerns and issues and to celebrate progress. Any project team and specialist attendance at these open days would need to be determined at the time. Having the right people in attendance provides project and engagement process credibility, meaning that a broad base of support for the project is more likely to be achieved.

7.3 Workshops

Key stakeholder workshops should be designed to keep participants interested and engaged. Any workshops need to be focused, results driven and seen by stakeholders as a genuine opportunity for them to be involved.

7.4 How will engagement be evaluated

Evaluation of the effectiveness of engagement processes will be undertaken throughout the project. A project database is intended to be used to record details of each engagement method/tool used, where fields would include:

- characteristics of respondents / participants (such as stakeholder sector or group);
- timing and location of engagement, and
- content.

The level of detail would vary by method/tool, where a database could be used to monitor both the coverage and content of the engagement process. This would both evaluate progress towards engagement objectives and, as part of a continuous improvement cycle.

Coverage will be assessed to identify gaps in the reach of the engagement methods so that they can be further tailored to engage across all identified stakeholders and the wider community. Progress updates on the coverage and content of engagement could be shared with WDC and Watercare at agreed points so that decisions can be made about subsequent priorities. Content can also be reviewed and refined to meet the emerging information needs of stakeholders and the wider community.

8 Risks and Opportunities

It is important to identify the potential risks and opportunities associated with the engagement process and determine what actions need to be taken to reduce risk and make the most of any opportunity presented. In terms of this Project the following risks and opportunities have been identified.

Ref	Opportunities/Risks	Level	Mitigation or Action Plan
1	Strengthen relationships between the WDC/Watercare and the Engagement Partners.	Moderate	The engagement process should always be seen as an opportunity for WDC and Watercare to improve and build upon their relationships with key stakeholders and the wider community. • Undertake stakeholder Workshop • Work collaboratively with the key stakeholders • Clear and concise briefing material for the stakeholder workshops • Experienced facilitator • Develop a common understanding of the problem, benefits and risks with key stakeholders to reach an agreed decision on shortlisted options.
2	Grand standing takes place by a party or parties who have a particular issue with the project to the extent	Moderate	• Avoid any engagement methods that create an ‘us and them’ environment such as public meetings. • All engagement needs to be

	that other voices are not being heard.		personable based on a genuine desire to listen and understand all views held.
3	The end result of the Project will result in an improvement to the Raglan WWTP and discharge. Whilst it is acknowledged that there have been adverse effects associated with the proposal that must be addressed, equally there is an good story that also needs to be told. The Project also provides an opportunity to educate the community on wastewater processes.	Moderate	Ensure that throughout the engagement process, the 'good news' story is also emphasised, whilst recognising the importance to address any potentially adverse effects that have occurred. One should not dominate the other.

9 Role Definition and Reporting Protocols

9.1 Roles and Responsibilities

WDC will 'front' key aspects of all stakeholder engagement activities, with the project team, providing support in other areas, as required.

The key personnel and their roles in project engagement are set out below:

Role	Personnel	Contact Details
WDC/Watercare Client -Project Manager	Stephen Howard	Stephen.Howard@waidc.govt.nz
WDC Iwi and Community Partnerships Manager	Sam Toka	Sam.Toka@waidc.govt.nz
Environmental Scientist - technical expert	Nicola Marvin	Nicola.Marvin@beca.com
Environmental Scientist - technical expert	Garrett Hall	Garrett.Hall@beca.com
Planning and Engagement Planner Lead	Anna Lewis	Anna.Lewis@beca.com
Planning and Engagement Planner	Stephanie Dean	Stephanie.Dean@beca.com

1. **Stephen Howard** will approve any contact, engagement and communication material and the public release of these materials after any necessary managerial approvals. Stephen will also be responsible for internal communication within WDC/Watercare , and co-coordinating communication with Councillors alongside WDC/Watercare Managers
2. **Sam Toka** will advise on appropriate iwi engagement and engagement plans, as well as review /facilitate communication with parties when needed
3. **Nicola Marvin** will provide specialist technical information for engagement and verify any technical material to be used in engagement.
4. **Garrett Hall** will provide specialist technical information for engagement and verify any technical material to be used in engagement.
5. **Anna Lewis** will provide strategic engagement advice and verification (where required) and the overall approval of the Project team outputs in regard to engagement and communication.
6. **Stephanie Dean** will be involved in continuous stakeholder liaison throughout the Project and assisting Anna on engagement tasks.

9.2 Reporting and Response Protocols

1. All engagement carried out by the Project team is to be recorded. A communication record will be developed and representatives of the Project team will need to ensure that notes are generated at each meeting and sent to Anna Lewis/Stephanie Dean to register, file and disseminate to those responsible for taking action.

2. An engagement database will be set up for the Project and will be administered by the Project team. This database will record key engagement personnel including contact details.

3. A communication timeline will be set up for the Project and will be administered by the Project Team. This timeline will record any engagement and communication undertaken/meeting dates, issues raised, feedback received, actions to be undertaken and by whom and by when. This timeline will be updated over the course of the Project as engagement and communication occurs.

4. Regular meetings will be held between the Project team and WDC to discuss key engagement and communication matters.

9.3 Approval Process

Dissemination of formal information shall be through predefined and fixed lines of approvals and communication.

9.3.1 Media Management

All media enquiries will be referred to and managed by WDC. Project Team members will not be authorised to make statements of fact or opinion to the media.

9.3.2 Release of Public Materials

All materials prepared by the Project Team that are to be issued to the public require sign off by WDC's Project Manager before being released.