



3 October 2016

Better Urban Planning Inquiry
New Zealand Productivity Commission
PO Box 8036
The Terrace
WELLINGTON 6143
New Zealand

Attn: Steven Bailey,

Re: Better urban planning draft report

The Whanganui District Council appreciates the Productivity Commission providing an opportunity for Council to submit on its document 'Better urban planning- draft report'.

In general, Whanganui District Council supports the efforts made thus far by the Commission. Council has noted key areas that impact Whanganui District Council, and our submission is attached.

Yours sincerely,

Annette Main

Mayor

Whanganui District Council

Kym Fell

Chief Executive

Whanganui District Council

Whanganui District Council's feedback on the proposed Local Government Act (2002) Amendment Bill (No. 2).

1. Executive summary

- 1.1. Whanganui District Council (WDC) is supportive of the Productivity Commission's (Commission) work in providing a draft report for Territorial Authorities to engage with its current review of the planning system.
- 1.2. We are appreciative of the Commission's work in addressing the need for central government to develop processes to more clearly signal the national interest in planning, but draw issue as to how the consultation draft report reduces the impact of public consultation and overtly prioritises developer rights above local plans and policies.
- 1.3. Further incentives and the use of soft approaches including education, training, and access to a central planning depository to encourage good practice is welcomed.
- 1.4. The following list provides a summary of our key recommendations. For a complete summary of our responses and recommendations, please refer to Appendix 1.

Chapter 7 – Regulating the built environment

- We are not supportive of integrating consultation and decision-making processes, and principles for decisions on land use rules, transport and infrastructure provision.
- WDC agrees the current provisions of the Local Government Act function well, providing optimum use is made of various engagement channels including print, social media, website, and public forums.
- We are supportive for councils to have the ability to choose if a plan change is to go before an Independent Hearings Panel for review.
- We recommend better education and resources from central government as these would sufficiently discourage poor use of regulatory discretion.
- We recommend against the use of a punitive tax as a policy instrument to discourage unreasonable resource consent conditions.
- We disagree that it is reasonable for councils to pay for all or some of the costs associated with visual amenity objectives for private property.
- We recommend the Productivity Commission remove proposed Recommendation 7.1 in consideration of the risk of adversely impacting other priority areas of planning.
- WDC strongly disagrees with proposed Recommendation 7.2 for land price information to be utilised as a key central policy and monitoring tool in any future planning system.
- We recommend proposed Recommendation 7.3 is withdrawn.
- WDC strongly disagrees with proposed Recommendation 7.5 as this over-simplifies and unnecessarily restricts people/organisation's appeal rights.
- WDC supports the Commission's proposed Recommendation 7.6 as we are supportive of the provision for more flexibility when it comes to public engagement.

- We make the recommendation the Commission's proposed Recommendation 7.7 is waived until evidence is presented evaluating the success of Independent Hearing Panels.
- WDC supports the Commission's proposed Recommendation 7.8 believing this will provide better linkages between the LGA and the RMA in regards to developer agreements.
- We are supportive of central government developing processes to more clearly signal the national interest in planning and to have protocols to work through the implications of national interests with local authorities.
- We do not support the proposed Recommendation 7.10, and recommend its removal.

Chapter 8 – Urban planning and the natural environment

- We support any Government Policy Statement on Environment Sustainability that is developed to be accompanied or preceded by a National Policy Statement (NPS) on environment sustainability as defined under Section 45(2) of the Resource Management Act 1991.
- WDC recommends it is not necessary to put greater emphasis on adaptive management in assisting in managing cumulative environmental effects in urban areas.
- WDC supports, prior to the use of urban planning as a means of reducing GHG, that more robust empirical research is necessary.
- We are supportive of encouraging more interaction between national and local government sectors.
- We support proposed Recommendation 8.4 on the basis that environmental effects on the community are being resolved to the community's satisfaction and ask the proposed recommendation to be revised to that effect.

Chapter 9 – Urban planning and infrastructure

- We suggest spatial plans should be available as an option to complement District Plans, but suggest they are not an effective replacement. We suggest encouragement of the use of spatial plans, but not making them mandatory.
- We strongly support the establishment of a centre of resources that councils could draw on for analysis in the development of land use plans regardless of the proposed planning system changes.
- We agree good practice ensures the proposed Recommendation 9.3 is already the status quo, minus a formal process, and we recommend the proposal is not required.

Chapter 10 – Infrastructure: funding & procurement

- WDC supports introducing a legislative expectation that councils can recover the capital and operating costs of new infrastructure from beneficiaries.
- We are supportive of further investigation into local taxation (within guidelines set nationally) to recover infrastructure costs.
- WDC strongly recommends against the proposal to allow councils to auction and sell a certain quantity of development rights above the standard controls set in a District Plan as this is counter to the broader purposes of the planning system.
- WDC disagrees with the proposed requirement that public-private partnerships apply to all significant local government infrastructure projects.

- We recommend the Commission's proposed Recommendation 10.1 be removed as infrastructure costing does not currently adequately fit the RMA planning process.
- We disagree with proposed Recommendation 10.2 as it infringes the principle of funding being a local decision.
- We disagree with proposed Recommendation 10.3 to enable councils to levy targeted rates on the basis of changes in land value as this effectively socialises costs for private gain.
- We support proposed Recommendation 10.4 to be revised to encourage councils to scope all options in order to effectively and efficiently deliver local infrastructure.

Chapter 11 – Urban planning and the Treaty of Waitangi

- We suggest District Plan policies and provisions should include a focus on empowering papakāinga.
- We recommend soft power approaches instead of further regulatory ones to better streamline processes involving Te Ture Whenua Act 1993 and the Resource Management Act 1991.
- We recommend to the Commission the provision of funding for Iwi Management Plans as an instrument to strengthen Māori participation in land-use planning decisions.

Chapter 12 – Culture and capability

- We make the recommendation that central government provide expertise and guidance in the areas of environmental science and economics.
- We agree with proposed Recommendation 12.2 and suggest central government to be assisted by bodies such as New Zealand Planning Institute and universities

Chapter 13 – A future planning framework

- We suggest that keeping to a single resource management law positively retains a planning framework based on a holistic rather than a fragmented view.
- WDC considers establishing two laws to regulate the built and natural environment separately would cause more added complexity in decision making processes and greater uncertainty for investors than current processes.
- WDC is supportive of an enhanced external audit and improved oversight of regional council performance.

2. Introduction

- 2.1. The Whanganui District Council appreciates the Productivity Commission providing an opportunity for Council to submit on its *Better urban planning draft report*.
- 2.2. In general, we support a planning system that better links the Resource Management Act 1991 (RMA) and the Local Government Act 2002 (LGA) without diminishing the purposes and principles of these acts.
- 2.3. Our feedback addresses the draft report's questions and proposed recommendations, and this is discussed in the proceeding section.

3. Feedback

3.1. Chapter 7 – Regulating the built environment

- *Question 7.1: Would it be worth moving to common consultation and decision-making processes and principles for decisions on land use rules, transport and infrastructure provision? How could such processes and principles be designed to reflect both:*

3.1.1. We do not support integrating consultation and decision-making processes, and principles for decisions on land use rules, transport and infrastructure provision.

3.1.2. Consultation processes, as complex and seemingly restrictive as they currently appear, are designed to engage citizens in the planning process. Attempts to integrate consultation and decision making between land use, transport and infrastructure would inevitably result in added complexity and confusion, and be ever less meaningful in terms of engagement with residents.

- *Question 7.1a: The interest of the general public in participating in decisions about local authority expenditure and revenue;*

3.1.3. We agree current provisions for consultation legislated in the Local Government Act 2002 for Territorial Authorities to provide the general public with opportunities to participate in decisions about local authority expenditure and revenue in Annual and 10 year plans function well and are fit for purpose.

- *Question 7.1b: The particular interest of property owners and other parties affected by changes to land use controls?*

3.1.4. Please see our response to question 7.1a above.

- *Question 7.1c: Do the consultation and decision-making processes and principles in the Local Government Act adequately reflect these interests?*

3.1.5. WDC agrees the current provisions of the Local Government Act function well, providing optimum use is made of various engagement channels including print, social media, website, and public forums.

- *Question 7.2: Should all Plan changes have to go before the permanent Independent Hearings Panel for review, or should councils have the ability to choose?*

3.1.6. We are supportive for councils to have the ability to choose if a plan change is to go before an Independent Hearings Panel for review. Circumstances, including where plan changes are deemed to be technically complex or in the event consensus is not reached amongst Councillors and community representatives, could trigger councils to engage with the permanent Independent Hearings Panel, but reiterating S34 of the RMA, this will need to be decided at a council level.

3.1.7. We ask that the permanent Independent Hearings Panel be trained and technically competent and provided with suitable support.

3.1.8. Overall, we are supportive that decisions on local development plan policies should be made by Councillors and other community representatives such as iwi representatives.

➤ *Question 7.3: Would the features proposed for the built environment in a future planning system (eg, clearer legislative purposes, narrower appeal rights, greater oversight of land use regulation) be sufficient to discourage poor use of regulatory discretion?*

3.1.9. We appreciate the Productivity Commission's efforts in proposing mechanisms to discourage poor use of regulatory discretion, but disagree the proposals will encourage a change in behaviour.

3.1.10. There are sufficient checks and balances in current processes to minimise the risk of poor use of regulatory discretions. We recommend better education and resources from central government as these would sufficiently discourage poor use of regulatory discretion.

➤ *Question 7.4: Would allowing or requiring the Environment Court to award a higher proportion of costs for successful appeals against unreasonable resource consent conditions be sufficient to encourage better behaviour by councils? What would be the disadvantages of this approach?*

3.1.11. We are concerned that imposing higher costs in successful appeal proceedings would provide an incentive to developers to mobilise resources in ever greater efforts to have more decisions and conditions declared unreasonable.

3.1.12. Providing such an incentive runs the risk developers will continue to contend consent conditions to the point it may become an established practice.

3.1.13. The adoption of the proposed punitive tax effectively punishes a council financially, along with its represented community, shifting council revenue away from projects needed for growth. This is a guiding principle of the consulted upon draft report.

3.1.14. WDC recommends against the use of a punitive tax as a policy instrument to encourage better behaviour by councils and for such an instrument not be applied in the Environment Court.

3.1.15. We instead suggest to the Commission the establishment of an improved central resource of planning best practice and guidance, supported by the Environment Court. This would assist with the clarification of ambiguous situations, coupled with the safeguarding of appropriate training for planning officers so that unreasonable conditions are not be imposed in the first instance.

➤ *Question 7.5: Would it be worthwhile requiring councils to pay for some, or all, costs associated with their visual amenity objectives for private property owners? Should councils only rely on financial tools for visual amenity objectives, or should they be combined with regulatory powers?*

3.1.16. We disagree that it is reasonable for councils to pay for all or some of the costs associated with visual amenity objectives for private property owners as it runs the risk of potentially undermining incentives for developers to behave in a socially responsible manner in that it socialises one of the costs of development at the ratepayer's expense.

3.1.17. When councils pay costs towards heritage it is because it is recognised as having a community value now and into the future¹. Funding property owners for the loss of visual amenity does not serve the public at large, in the same manner that heritage does.

➤ *Recommendation no. 7.1: Future urban planning legislation should clearly prioritise responding to growth pressures, providing land use flexibility, and supporting the ability of residents to easily move through their city.*

3.1.18. WDC is concerned if future urban planning legislation prioritises growth pressures, providing land use flexibility, and supporting the ability of residents to move through their city, this may risk devaluing and adversely impacting equally important priority areas of the planning system.

3.1.19. Aside from the three priority areas proposed, the planning system concerns itself in the protection and preservation of existing land and built development assets, such as the productive capacity (product value) of soils and cultural value of heritage assets, improving

¹ As set out in the Resource Management Act 1991, Heritage New Zealand Act 2014, Building Act 2004 and Local Government Act 2002.

the quality of life for citizens, and finding the balance between a multitude of costs and benefits of development.

3.1.20. We recommend the Productivity Commission remove proposed Recommendation 7.1 in consideration of the risk of adversely impacting other priority areas of planning.

➤ *Recommendation no. 7.2: Information about land price should be a central policy and monitoring tool in any future planning system, and should drive decisions on the release, servicing and rezoning of development capacity.*

3.1.21. WDC strongly disagrees with proposed Recommendation 7.2 for land price information to be utilised as a key central policy and monitoring tool in any future planning system, including driving decisions on the release, servicing and rezoning of development capacity. This is because the proposed recommendation is economic centric, omitting and devaluing priority areas in a similar way to that as proposed in Recommendation 7.1.

3.1.22. We are concerned if the proposed recommendation is adopted it will create a planning system more prone to exploitation by developers who could financially benefit by selling to each other to secure re-zoning by artificially driving up land value. We agree economics is an important factor, but should not act as the principal determinant of strategic land use.

3.1.23. We recommend that proposed Recommendation 7.2 be revised to include, and equally factor in, that in any future planning system determining the release, servicing, rezoning and general provision of suitable areas for future development:

- developers and community demand deems feasible and;
- where services and environmental factors are efficient sustainable.

➤ *Recommendation 7.3: A future planning system should allow for more responsive rezoning, in which land use controls can be set in anticipation of predetermined and objective triggers and activated once those triggers are reached.*

3.1.24. We are of the opinion proposed Recommendation 7.3 neglects the strategic approach to land use allocation on the grounds it fails to recognise the value of planning, including public participation.

3.1.25. The proposal effectively automates re-zoning and is a fundamentally anti-democratic as it:

- reduces the ability of local communities to influence how their community develops.
- removes the ability of local communities to make planning related decisions and assume those costs.

3.1.26. Further complexity is added as trigger mechanisms based on land values would need to be developed contextually and continuously reviewed to remain meaningful.

3.1.27. We recommend proposed Recommendation 7.3 is withdrawn.

➤ *Recommendation 7.4: A future planning system should focus urban notification requirements (and any associated appeal rights) on those directly affected, or highly likely to be directly affected, by a proposed development. This would better align the planning system with the fundamental purpose of managing negative externalities.*

3.1.28. We question the logic of the proposed recommendation in that it equates less notification and community engagement with better decision making. WDC disagrees with this statement and recognises notification as a method of disseminating information to engage more widely with the affected community.

3.1.29. We are concerned as to what the criteria for deciding 'directly' affected means in practice. We further share concern that the proposed recommendation is not grounded in a paradigm that supports the overarching purpose of sustainable development as opposed to managing negative externalities.

3.1.30. We submit there is potential to identify minor activities that do not require onerous engagement.

➤ *Recommendation 7.5: Any appeal rights on Plans in a future system should be limited to people or organisations directly affected by proposed plan provisions or rules.*

3.1.31. WDC strongly disagrees with proposed Recommendation 7.5 as this over-simplifies and unnecessarily restricts people/organisation's appeal rights. Groups have the expertise and local knowledge that can lead to better decisions, and should retain the right to appeal if they have made a submission.

3.1.32. The impact of reducing rights of appeal would be mitigated by widening the notification requirements to secure wider community involvement in the consenting process.

➤ *Recommendation 7.6: Consultation requirements under a future planning system should:*

- *give councils flexibility to select the most appropriate tool for the issue at hand;*
- *allow councils to notify only affected parties of Plan changes that are specific to a particular site;*

- *encourage and enable participation by people affected, or likely to be affected, by a decision; and*
- *encourage the use of tools that ensure the full spectrum of interests is understood in council decision-making processes, and that allow the public to understand the trade-offs involved in decisions.*

3.1.33. WDC supports the Commission's proposed Recommendation 7.6 as we are supportive of the provision for more flexibility when it comes to public engagement.

3.1.34. Requirements for more complete provision of research information would be welcomed as processes such as public notices in newspapers tend not to elicit robust public engagement. We would be interested in seeing what approaches could be undertaken to mitigate the negative effects of notifying affected parties that ,at the same time, encourage wider community engagement.

➤ *Recommendation 7.7: A permanent Independent Hearings Panel should be established to consider and review new Plans, Plan variations and private Plan changes across the country.*

As with the Auckland and Christchurch IHPs:

- *councils should retain the rights to accept or reject recommendations from the permanent Independent Hearings Panel; and*
- *once a council accepts a recommendation from the permanent Independent Hearings Panel, appeal rights should be limited to points of law.*

3.1.35. We acknowledge an Independent Hearing Panel would ensure more technically correct/ appropriate decisions are made, removing the political and potentially partisan elements of local councillor panels, but insist that local knowledge and expertise in local affairs is an important element of decision making which should be be retained.

3.1.36. Our concerns are founded in the level of evidence required for a Plan like Auckland or Christchurch, which would be near impossible and onerous for smaller areas like Whanganui to achieve. Furthermore, with regard to the ability to accept or reject recommendations from an IHP, there is no evidence to suggest if this process has had success when applied in Auckland or Christchurch. We suggest that the proposed use of IHPs is fully researched and evaluated prior to national roll- out.

3.1.37. We make the recommendation the Commission's proposed Recommendation 7.7 is waived until evidence is presented evaluating the success of Independent Hearing Panels.

➤ *Recommendation 7.8: A future planning system should enable councils to provide targeted infrastructure or services investment (eg, the expansion of green spaces or upgrades to existing community facilities) for areas facing significant change, to help offset any amenity losses.*

3.1.38. We appreciate the Commission's thoughts in investigating new ways to mitigate adverse effects.

3.1.39. WDC supports the Commission's proposed Recommendation 7.8. We believe this will provide better linkages between the LGA and the RMA in regards to developer agreements.

➤ *Recommendation 7.9: Central government should develop processes to more clearly signal the national interest in planning, and have protocols to work through the implications of these national interests with local authorities. It should also monitor the overall performance of the planning system in meeting national goals (ie, flexibility, sufficient development capacity and accessibility).*

3.1.40. We are supportive of central government developing processes to more clearly signal the national interest in planning and to have protocols to work through the implications of national interests with local authorities. National Policy Statements have historically been slow to develop, but national templates for common development issues would be useful to ensure nationwide consistency and save every council using resources to end up with very similar Plan provisions; e.g. noise standards, and development adjacent to state highways.

3.1.41. We are supportive of improved monitoring of the overall performance of the planning system in meeting national goals. We support flexibility, sufficient development capacity, and accessibility as goals and look forward to future consultation opportunities to provide feedback.

➤ *Recommendation 7.10: In a future planning system, central government should have the power to*

- *override local plans in a limited set of circumstances*
- *co-ordinate or require common land use approaches to specific issues, and*
- *direct council infrastructure units or CCOs to increase their supply, where the differential between the price of developable and undevelopable land exceeds a pre-determined threshold.*

3.1.42. We are concerned with the proposed recommendation's ability to be consistent with decision making processes under the Local Government Act 2002, specifically:

- Section 76 - Decision-making
- Section 76AA - Significance and engagement policy

- Section 77 - Requirements in relation to decisions
- Section 81 - Contributions to decision-making processes by Māori
- Section 82 - Principles of consultation

3.1.43. Committing to the proposal effectively overturns planning decisions made by a qualified panel, already regularly tested in court, and is anti-democratic in that it devalues community engagement that ultimately risks weakening community advocacy and trust in government sectors.

3.1.44. The proposed recommendation is narrowly based on land supply constraints as the key deterrent for private businesses to develop land, without factoring in the availability of reasonable consent options. As there is no evidence outside of the land supply situation in Auckland to suggest the latter is an issue, the proposed recommendation's application or any parts of an equal solution should only apply to definable areas experiencing a lack of consent options.

3.1.45. We do not support the proposed Recommendation 7.10 and recommend its removal.

3.2. Chapter 8 – Urban planning and the natural environment

➤ *Question 8.1: What should be the process for developing a Government Policy Statement (GPS) on Environmental Sustainability? What challenges would developing a GPS present? How could these challenges be overcome?*

3.2.1.WDC suggests in the process of developing a GPS, a wider scope of technical experts is engaged with to include the technical expertise of experienced practitioners across various sectors together with Ministry for the Environment, Ministry of Primary Industries and Ministry of Business, Innovation, and Employment.

3.2.2.We appreciate there is merit in developing a GPS on environment sustainability, in that the government notifies the wider public as to the strategic direction and corresponding financial spending it will undertake to deliver environment sustainability. For council planners, more tangible detail is required as to what roles planning teams will take part in to support the government's direction on environment sustainability.

3.2.3. Another challenge presented in developing a GPS on environment sustainability is that acknowledging environment sustainability is a key priority area for planning, other areas equally warrant documented central government strategic direction including: mineral extraction, control of pollution, monitoring and compliance, development in flood-prone areas, and urban housing standards.

3.2.4. Therefore, we make the following recommendations:

- a. Considering Government Policy Statements are conventionally high-level orientated, we recommend any Government Policy Statement on Environment Sustainability developed to be accompanied or preceded by a National Policy Statement (NPS) on environment sustainability as defined under Section 45(2) of the Resource Management Act 1991.
- b. We recommend to the Commission to advise the government to develop Government Policy Statements or appropriate documentation of government direction on other key planning priority areas.

➤ *Question 8.2: Would a greater emphasis on adaptive management assist in managing cumulative environmental effects in urban areas? What are the obstacles to using adaptive management? How could adaptive management work in practice?*

3.2.5. WDC recommends it is not necessary to put greater emphasis on adaptive management in assisting in managing cumulative environmental effects in urban areas. Effective consenting in conformity with development plan policies and national planning guidance is the appropriate way to manage cumulative impact.

3.2.6. Given adaptive management is essentially done via the resource consent process, exercising an adaptive management framework in the development of Plans would lead to increased review frequencies causing a reduction in certainty for developers.

➤ *Recommendation 8.1: Future planning system should include a Government Policy Statement (GPS) on environmental sustainability. The GPS should:*

- *set out a long-term vision and direction for environmental sustainability;*
- *establish quantifiable and measurable goals against which progress would be monitored and reported on; and*
- *establish principles to help decision makers prioritise environmental issues when faced with conflicting priorities or scarce resources.*

3.2.7. We express concern as to the use of a GPS instead of a NPS. National direction via a GPS can be very helpful in understanding the bigger picture beyond District boundaries, however we remain concerned about the extent of the potential politicisation of such a policy and the establishment of quantifiable and measurable goals.

3.2.8. GPS goals would be necessarily high level to enable local application given the variation between council sizes and issues. Prioritising environmental issues at a national level to be implemented at a local level risks precluding tailoring policy to a local context.

3.2.9. We agree clearer local guidance on environmental priorities would be useful, but in consideration of variations between council sizes and issues, we recommend any planning GPS to be developed and supplemented by a NPS.

3.2.10. We therefore reiterate our recommendation to the draft report's Question 8.1 as response to the Commission's proposed Recommendation 8.1:

- a. Considering GPSs are conventionally high-level orientated, we recommend any Government Policy Statement on Environment Sustainability developed to be accompanied or preceded by a National Policy Statement (NPS) on environment sustainability as defined under Section 45(2) of the Resource Management Act 1991.

➤ *Recommendation 8.2: Before attempting to use urban planning as a means of reducing GHG emissions in New Zealand, a more robust empirical research base should be developed reflecting New Zealand circumstances. Specifically, research should aim to improve the government's understanding of local factors that shape urban GHG emissions in New Zealand, and the extent to which urban planning can influence these factors.*

3.2.11. GHG are generated in large quantities in both urban and rural areas and with a better understanding of the causes, councils could tailor performance standards and consent conditions to mitigate GHG through better practices.

3.2.12. WDC supports, prior to the use of urban planning as a means of reducing GHG, that more robust empirical research is necessary.

Recommendation 8.3: Central and local government should develop an agreed set of principles to govern the development of national regulations that have implications for the local government sector. This should be along the lines of the 'Partners in Regulation' protocol recommended in the Commission's report Towards Better Local Regulation (2013).

3.2.13. We are supportive of encouraging more interaction between national and local government sectors and support the proposed recommendation that this should be developed as an agreed set of principles as provided for in the "Partners in Regulation" protocol.

3.2.14. It is worth noting the agreed principles would need to take into account the necessity of staggering national government consultation. As of lately, three major policy reviews have occurred this year causing some confusion as there was an overlap of consulted topics.

3.2.15. We ask the agreed set of principles be developed equally between national and local government sectors.

➤ *Recommendation 8.4: When regulating urban spillovers affecting the natural environment, a future planning system should provide government bodies access to the full suite of policy tools including market-based tools.*

3.2.16. We support proposed Recommendation 8.4 on the basis that environmental effects on the community are being resolved to the community's satisfaction and ask the proposed recommendation to be revised to that effect.

3.3. Chapter 9 – Urban planning and infrastructure

➤ *Question 9.1: Which components of the current planning system could spatial plans replace? Where would the greatest benefits lie in formalising spatial plans?*

3.3.1. We suggest spatial plans should be available as an option to complement District Plans, but suggest they are not an effective replacement.

3.3.2. For areas other than the identified growth centres, spatial plans would be an informative extra that could be used to inform the public of planning direction.

➤ *Recommendation 9.1: Spatial plans should be tightly defined and focus on issues closely related to land use, in particular the provision of water and transport infrastructure and community facilities (eg, green space, reserves, conservation areas, and libraries), protection of high value ecological sites, and natural hazard management.*

3.3.3. We suggest encouragement of the use of spatial plans, but not making them mandatory.

➤ *Recommendation 9.2: As part of the transition to a future planning system, central government should establish a centre of excellence or resource that councils could draw on to conduct real options analysis in the development of land use plans.*

3.3.4. We strongly support the establishment of a centre of resources that councils could draw on for analysis in the development of land use plans *regardless* of the proposed planning system changes.

3.3.5. A national approach would see an establishment of resources done once and at less time, effort, and cost to individual councils. We suggest, but not limited to, the following topics to be covered in a centre of resources:

- noise standards
- mapping formats
- template of standard definitions

➤ *Recommendation 9.3: A future planning system should include institutions or formal processes through which councils and central government can work together to assess major programmes of urban infrastructure investment with wider spillover benefits.*

3.3.6. WDC is supportive of working with central government to assess major programmes of urban infrastructure investment, but disagrees that formalising this process is warranted.

3.3.7. Government agencies like NZ Transport Agency conscientiously liaise with councils in our region and regularly work with WDC. We are concerned the proposal is an extra layer of red tape for major programmes, when there is no firm evidence that it is required.

3.3.8. We agree good practice ensures the proposed Recommendation 9.3 is already the status quo, minus a formal process, and we recommend the proposal is not required. Adding another bureaucratic layer is adding cost for little to no gain; if there are issues that are addressed by the proposed recommendation, these issues are not at the provincial planning level.

3.4. Chapter 10 – Infrastructure: funding & procurement

➤ *Question 10.1: Is there other evidence that either supports or challenges the view that “growth does not pay for growth”?*

3.4.1. WDC is of the opinion continuous growth is an unsustainable process.

3.4.2. The gradual failure of Auckland transport infrastructure is evidence growth does not equate to paying for growth.

3.4.3. In 2015, the NZ Transport Agency announced \$4.2 billion would be invested in Auckland transport over the next three years, with 5% of the investment spent on bus or rail infrastructure². The portion of investment injected into public transport was determined insufficient to meet experienced growth as, at the time of NZ Transport Agency’s announcement, it was claimed Auckland’s City Rail Link was experiencing a 20% growth in patronage³.

² <https://www.nzta.govt.nz/media-releases/4-2b-partnership-to-strengthen-aucklands-transport-links/>

³ <http://www.radionz.co.nz/news/regional/277615/government-'failing'-to-deal-with-auckland-transport>

➤ *Question 10.2: Would there be benefit in introducing a legislative expectation that councils should recover the capital and operating costs of new infrastructure from beneficiaries, except where this is impracticable?*

3.4.4. WDC supports introducing a legislative expectation that councils can recover the capital and operating costs of new infrastructure from beneficiaries, provided that the definition of beneficiaries is sufficiently widely drawn. We believe this is a sensible approach for development to pay and may assist in better growth being pursued by developers.

➤ *Question 10.3: Would alternative funding systems for local authorities (such as local taxes) improve the ability to provide infrastructure to accommodate growth? Which funding systems are worth considering? Why?*

3.4.5. We are supportive of further investigation into local taxation (within guidelines set nationally) to recover infrastructure costs.

➤ *Question 10.4: Would there be benefit in allowing councils to auction and sell a certain quantity of development rights above the standard controls set in a District Plan? How should such a system be designed?*

3.4.6. WDC strongly recommends against the proposal to allow councils to auction and sell a certain quantity of development rights above the standard controls set in a District Plan as this is counter to the broader purposes of the planning system.

3.4.7. The District Plan currently sets out rules for the purposes to serve and benefit the community, and where exemptions are made, these are accordingly assessed and completed to support these purposes. The proposal transforms development rights into a tradable commodity.

➤ *Question 10.5: Should a requirement to consider public-private partnerships apply to all significant local government infrastructure projects, not just those seeking Crown funding?*

3.4.8. WDC disagrees with the proposed requirement that public-private partnerships apply to all significant local government infrastructure projects. We suggest public-private partnerships, including shared services, work best when both parties exercise self-agency to mutually work together rather coerced by a third party.

➤ *Recommendation 10.1: A future planning system should allow councils to:*

- *set volumetric charges for both drinking water and wastewater; and*
- *apply prices for the use of existing local roads where this would enable more efficient use of the road network.*

3.4.9. Infrastructure costs are a critical element of spatial planning and the development process.

We appreciate the Commission is aiming to combine the LGA and RMA for what we perceive as increasing funding avenues for council infrastructure.

3.4.10. We are concerned at the potential risks of combining infrastructure funding and planning decisions on the environmental effects of an activity and suggest keeping these processes separate. This is not to say we do not support territorial authorities' ability to investigate and apply a range of methods to levy the community to fund infrastructure.

3.4.11. Therefore, we recommend the Commission's proposed Recommendation 10.1 be removed as infrastructure costing does not currently adequately fit the RMA planning process.

➤ *Recommendation 10.2: Councils should use targeted rates to help fund investments in local infrastructure, wherever the benefits generated can be well defined.*

3.4.12. We disagree with proposed Recommendation 10.2 as it infringes the principle of funding being a local decision. Council represents the community and the community should decide how and for what purposes their rates are collected and spent.

➤ *Recommendation 10.3: A future planning system should enable councils to levy targeted rates on the basis of changes in land value, where this occurs as the result of public action (eg, installation of new infrastructure, upzoning).*

3.4.13. We agree that the level of rates affects the amount of infrastructure work councils can undertake which then affects its ability to provide for development. However, that is, and should remain, the decision of the community as any development is funded through rates requiring consultation with the community and is not exclusively a planning decision.

3.4.14. We disagree with proposed Recommendation 10.3 to enable councils to levy targeted rates on the basis of changes in land value as this effectively socialises costs for private gain.

➤ *Recommendation 10.4: A future urban planning system should give councils the capability to use a wide range of innovative infrastructure delivery models, including public-private partnerships. Councils, either alone or through joint agencies, will need to develop the capabilities to operate such models successfully. Future arrangements could build on current regional shared-services initiatives that increase project scale and develop project commissioning expertise.*

3.4.15. WDC embraces the public/private partnership (Gonville Community Centre) and shared services (Rangitikei District Council) and have used them successfully. However, we have concerns as to how the proposed recommendation will be drafted and mandated in future legislation.

3.4.16. Public/private partnerships work when all parties desire shared outcomes, and agree that the conditions to consider public/private partnership are compulsory, but refrain from legislation dictating their mandatory use.

3.4.17. By what means local infrastructure is delivered and funded is a local decision and we support proposed Recommendation 10.4 to be revised to encourage councils to scope all options in order to effectively and efficiently deliver local infrastructure.

3.5. Chapter 11 – Urban planning and the Treaty of Waitangi

➤ *Question 11.1: What policies and provisions in district plans are required to facilitate development of papakāinga?*

3.5.1. We suggest District Plan policies and provisions should include a focus on empowering papakāinga and support to papakāinga housing delivery. WDC's District Plan has provisions to support the delivery of papakāinga housing, and more widely focuses on enabling papakāinga and controlling effects beyond the outer boundary.

➤ *Question 11.2: How can processes involving both the Te Ture Whenua Act 1993 and the Resource Management Act 1991 be better streamlined?*

3.5.2. We recommend soft power approaches instead of further regulatory ones to better streamline processes involving Te Ture Whenua Act 1993 and the Resource Management Act 1991, including:

- Clear guidance for all parties involved.
- Education - not more regulation.
- Encouragement and promotion of genuine collaborative working to deliver Iwi aspirations.

➤ *Question 11.3 Do councils commonly use cultural impact assessments to identify the potential impact of developments on sites and resources of significance to Māori? How do councils set the thresholds for requiring a cultural impact assessment? Who sets the fees for a cultural impact assessment and on what basis? What are the barriers to cultural impact assessments being completed in good time and how can those barriers best be addressed?*

3.5.3. Our Council is still in the infancy of developing the use of cultural impact assessments, but are working towards building Iwi capacity to engage with RMA and LGA processes, encouraging the use of CIA and iwi/hapu management plans through the District Plan review.

3.5.4. There are several barriers Council faces in more commonly utilising CIA frameworks. Firstly, hapu in our District have a primary focus on treaty settlements, and logically it can be perceived as a necessary barrier as this would have an impact on the underlying ethos of a CIA framework in empowering Iwi populations.

3.5.5. Secondly, local Iwi do not yet have the resources or capacity to undertake CIA.

3.5.6. Thirdly, and tied to the previous two points, councils are at risk in providing excess guidance as to the use of CIA or Tangata Whenua Impact Assessment that may dilute, as opposed to foster the growth of Iwi technical expertise and result in bipartite expertise instead.

➤ *Question 11.4: What sort of guidance, if any, should central government provide to councils on implementing legislative requirements to recognise and protect Māori interests in planning? How should such guidance be provided?*

3.5.7. We suggest central government could contribute by delivering best practice guidance, especially for new Councillors, and improving resources. With regard to best practice guidance, we suggest this take the form of applied, practitioner level, step by step guidance.

3.5.8. From our standpoint the bigger issue for WDC and local hapu is funding. Understanding this is outside the scope of the question asked, we ask the Commission to consider recommending to government a set funding (local or national) so as to build capacity to ease the execution of Council's legal requirements in this area as required under the LGA 2002 and RMA 1991.

➤ *Question 11.5: In what way, if any, and through what sort of instrument, should legislative provisions for Māori participation in land-use planning decisions be strengthened?*

3.5.9. We recommend to the Commission the provision of funding for Iwi Management Plans as an instrument to strengthen Māori participation in land-use planning decisions; without sufficient resourcing the Act requirements are unachievable.

3.5.10. Iwi Management Plans are recognised in District Plans by statute of the RMA 1991⁴ and we suggest extending this provision to the LGA 2002 may further strengthen Māori participation in land-use planning decisions.

3.6. Chapter 12 – Culture and capability

⁴ Resource Management Act 1991, s 74(2a)

- *Recommendation 12.1: A future planning system should place greater emphasis on rigorous analysis of policy options and planning proposals. This will require councils to build their technical capability in areas such as environmental science and economics. It would also require strengthening soft skills – particularly those needed to engage effectively with iwi/Māori.*

3.6.1. We agree with the recommendation a future planning system should place greater emphasis on rigorous analysis of policy options and planning proposals, but disagree with the onerous task placed on Councils to build their technical capability in environmental science and economics. These capabilities are currently provided to varying degrees by Manawatu-Whanganui Regional Council.

3.6.2. It is necessary for the level of evidence required to be balanced against the size of the proposal and the council, and considering not all councils can afford nor have the organisational capacity to employ experts in economics and environmental science, we make the recommendation that central government provide expertise and guidance in these areas to support council planning teams in any future planning system. We suggest an email helpdesk is sufficient for this task, but are open to further suggestions.

3.6.3. We believe if universal and general purpose planning topics necessitating economics and environmental science were handled at the national level and set out in national guidance, council resources could be better targeted to achieve higher quality local research including better implementation of softer skills.

- *Recommendation 12.2: Central government should improve its understanding of urban planning and knowledge of the local government sector more generally. An improved understanding will help promote more productive interactions between central and local government*

3.6.4. We agree with proposed Recommendation 12.2 and suggest central government be assisted by bodies such as New Zealand Planning Institute and universities. Furthermore, we recommend the focus of learnings needs to be outside of larger well-resourced Councils like Auckland, Wellington and Christchurch, and on smaller Councils for planning efficiency insights.

3.7. Chapter 13 – A future planning framework

- *Question 13.1: "What are the strengths and weaknesses of these two approaches to land use legislation? Specifically:"*

➤ *Question 13.1a: What are the strengths and weaknesses in keeping a single resource management law, with clearly-separated built and natural environment sections?*

3.7.1. We suggest that keeping to a single resource management law positively retains a planning framework based on a holistic rather than a fragmented view. The interconnection of built and natural environment sections is critical to the credibility and the success of the current legislative framework; the flow on effect of a *one stop shop* law is effective and efficient decision making.

➤ *Question 13.1b: What are the strengths and weaknesses in establishing two laws, which regulate the built and natural environment separately?*

3.7.2. WDC considers establishing two laws to regulate the built and natural environments separately would cause more added complexity in decision making processes and greater uncertainty for investors than current processes.

➤ *Question 13.2: Which of these two options would better ensure effective monitoring and enforcement of environmental regulation?*

- *Move environmental regulatory responsibilities to a national organisation (such as the Environmental Protection Authority).*
- *Increase external audit and oversight of regional council performance.*

3.7.3. WDC is supportive of an enhanced external audit and improved oversight of regional council performance. We believe this is probably the most cost effective option of the two in improving transparency and the provision of data for evaluation.

4. Conclusion

4.1. Thank you again for allowing Whanganui District Council to provide feedback. We look forward to seeing further progress of the draft report and thank the Productivity Commission for its work as of present.

Appendix 1: Summary of Responses and Recommendations

Questions

<i>Draft report Question no.</i>	<i>Submission page no.</i>	<i>WDC response/recommendation</i>
7.1	5	3.1.1. We do not support integrating consultation and decision-making processes, and principles for decisions on land use rules, transport and infrastructure provision.
7.1a	5	3.1.3. We agree current provisions for consultation legislated in the Local Government Act 2002 for Territorial Authorities to provide the general public with opportunities to participate in decisions about local authority expenditure and revenue in Annual and 10 Year Plans function well and are fit for purpose.
7.1b	5	3.1.4. Please see our response to question 7.1a above.
7.1c	5	3.1.5. WDC agrees the current provisions of the Local Government Act function well, providing optimum use is made of various engagement channels including print, social media, website, and public forums.
7.2	6	3.1.6. We are supportive for councils to have the ability to choose if a plan change is to go before an Independent Hearings Panel for review.
" "	6	3.1.7. We ask that the permanent Independent Hearings Panel be trained and technically competent and provided with suitable support.
" "	6	3.1.8. Overall, we are supportive that decisions on local development plan policies should be made by Councillors and other community representatives such as iwi representatives.
7.3	6	3.1.9. We appreciate the Productivity Commission's efforts in proposing mechanisms to discourage poor use of regulatory discretion, but disagree the proposals will encourage a change in behaviour.
" "	6	3.1.10. There are sufficient checks and balances in current processes to minimise the risk of poor use of regulatory discretions. We recommend better education and resources from central government as these would sufficiently discourage poor use of regulatory discretion.
7.4	7	3.1.14. WDC recommends against the use of a punitive tax as a policy instrument to encourage better behaviour by councils and for such an instrument not be applied in the Environment Court.
" "	7	3.1.15. We instead suggest to the Commission the establishment of an improved central resource of planning best practice and guidance, supported by the Environment Court. This would assist with the clarification of ambiguous situations, coupled with the safeguarding of appropriate training for planning officers so that unreasonable conditions are not be imposed in the first instance.
7.5	7	3.1.16. We disagree that it is reasonable for councils to pay for all or some of the costs associated with visual amenity objectives for private property owners as it runs the risk of potentially undermining incentives for developers to behave in a socially responsible manner in that it socialises one of the costs of development at the ratepayer's expense.
8.1	12	3.2.1. WDC suggests in the process of developing a GPS, a wider scope of technical experts is engaged with to include the technical expertise of experienced practitioners across various sectors together with Ministry for the Environment, Ministry of Primary Industries and Ministry of Business, Innovation, and Employment.

	13	3.2.4a. We recommend any Government Policy Statement on Environment Sustainability developed to be accompanied or preceded by a National Policy Statement (NPS) on environment sustainability as defined under Section 45(2) of the Resource Management Act 1991.
“ “	13	3.2.4a. We recommend to the Commission to advise the government to develop Government Policy Statements or appropriate documentation of government direction on other key planning priority areas.
8.2	13	3.2.4b. WDC recommends it is not necessary to put greater emphasis on adaptive management in assisting in managing cumulative environmental effects in urban areas. Effective consenting in conformity with development plan policies and national planning guidance is the appropriate way to manage cumulative impact.
9.1	15	3.3.1. We suggest spatial plans should be available as an option to complement District Plans, but suggest they are not an effective replacement.
10.1	16	3.4.1. WDC is of the opinion continuous growth is an unsustainable process.
“ “	16	3.4.2. The gradual failure of Auckland transport infrastructure is evidence growth does not equate to paying for growth.
10.2	17	3.4.4. WDC supports introducing a legislative expectation that councils can recover the capital and operating costs of new infrastructure from beneficiaries, provided that the definition of beneficiaries is sufficiently widely drawn. We believe this is a sensible approach for development to pay and may assist in better growth being pursued by developers.
10.3	17	3.4.5. We are supportive of further investigation into local taxation (within guidelines set nationally) to recover infrastructure costs.
10.4	17	3.4.6. WDC strongly recommends against the proposal to allow councils to auction and sell a certain quantity of development rights above the standard controls set in a District Plan as this is counter to the broader purposes of the planning system.
10.5	17	3.4.8. WDC disagrees with the proposed requirement that public-private partnerships apply to all significant local government infrastructure projects. We suggest public-private partnerships, including shared services, work best when both parties exercise self-agency to mutually work together rather than being coerced by a third party.
11.1	19	3.5.1. We suggest District Plan policies and provisions should include a focus on empowering papakāinga and support to papakāinga housing delivery.
11.2	19	3.5.2. We recommend soft power approaches instead of further regulatory ones to better streamline processes involving Te Ture Whenua Act 1993 and the Resource Management Act 1991, including: <ul style="list-style-type: none"> • Clear guidance for all parties involved. • Education - not more regulation. • Encouragement and promotion of genuine collaborative working to deliver Iwi aspirations.
11.3	20	3.5.4. There are several barriers Council faces in more commonly utilising CIA frameworks. Firstly, hapu in our District have a primary focus on treaty settlements, and logically it can be perceived as a necessary barrier as this would have an impact on the underlying ethos of a CIA framework in empowering Iwi populations.
“ “	20	3.5.5. Secondly, local Iwi do not yet have the resources or capacity to undertake CIA.

“ “	20	3.5.6. Thirdly, and tied to the previous two points, councils are at risk in providing excess guidance as to the use of CIA or Tangata Whenua Impact Assessment that may dilute, as opposed to foster the growth of Iwi technical expertise and result in bipartite expertise instead.
11.4	20	3.5.7. We suggest central government could contribute by delivering best practice guidance, especially for new Councillors, and improving resources. With regard to best practice guidance, we suggest this take the form of applied, practitioner level, step by step guidance.
“ “	20	3.5.8. From our standpoint the bigger issue for WDC and local hapu is funding. Understanding this is outside the scope of the question asked, we ask the Commission to consider recommending to government a set funding (local or national) so as to build capacity to ease the execution of Council’s legal requirements in this area as required under the LGA and RMA.
11.5	20	3.5.9. We recommend to the Commission the provision of funding for Iwi Management Plans as an instrument to strengthen Māori participation in land-use planning decisions; without sufficient resourcing the Act requirements are unachievable.
“ “	21	3.5.10. Iwi Management Plans are recognised in District Plans by statute of the Resource Management Act 1991 and we suggest extending this provision to the Local Government Act 2002 may further strengthen Māori participation in land-use planning decisions.
13.1a	22	3.7.1. We suggest that keeping to a single resource management law positively retains a planning framework based on a holistic rather than a fragmented view
13.1b	22	3.7.2. WDC considers establishing two laws to regulate the built and natural environments separately would cause more added complexity in decision making processes and greater uncertainty for investors than current processes.
13.2	22	3.7.3. WDC is supportive of an enhanced external audit and improved oversight of regional council performance. We believe this is probably the most cost effective option of the two in improving transparency and the provision of data for evaluation.

Proposed Recommendations

<i>Draft report Recommendation no.</i>	<i>Submission page no.</i>	<i>WDC response/recommendation</i>
7.1	8	3.1.20. We recommend the Productivity Commission remove proposed Recommendation 7.1 in consideration of the risk of adversely impacting other priority areas of planning.
7.2:	8	3.1.21. WDC strongly disagrees with proposed Recommendation 7.2 for land price information to be utilised as a key central policy and monitoring tool in any future planning system, including driving decisions on the release, servicing and rezoning of development capacity. This is because the proposed recommendation is economic-centric, omitting and devaluing priority areas in a similar way to that as proposed in Recommendation 7.1.
“ “	8	3.1.23. We recommend proposed Recommendation 7.2 be revised to include, and equally factor in, that in any future planning system determining the release, servicing, rezoning and general provision of suitable areas for future development: <ul style="list-style-type: none"> • developers and community demand deems feasible and;

		<ul style="list-style-type: none"> • where services and environmental factors are efficient sustainable.
7.3	9	3.1.27. We recommend proposed Recommendation 7.3 is withdrawn.
7.4	9	3.1.28. We question the logic of the proposed recommendation in that it equates less notification and community engagement with better decision making. WDC disagrees with this statement and recognises notification as a method of disseminating information to engage more widely with the affected community
7.4	9	3.1.30. We submit there is potential to identify minor activities that do not require onerous engagement.
7.5	9	3.1.32. WDC strongly disagrees with proposed Recommendation 7.5 as this over-simplifies and unnecessarily restricts people/organisation's appeal rights.
7.6	10	3.1.33. WDC supports the Commission's proposed Recommendation 7.6 as we are supportive of the provision for more flexibility when it comes to public engagement.
7.7	10	3.1.37. We make the recommendation the Commission's proposed Recommendation 7.7 is waived until evidence is presented evaluating the success of Independent Hearing Panels.
7.8	11	3.1.39. WDC supports the Commission's proposed Recommendation 7.8. We believe this will provide better linkages between the LGA and the RMA in regards to developer agreements.
7.9	11	3.1.40. We are supportive of central government developing processes to more clearly signal the national interest in planning and to have protocols to work through the implications of national interests with local authorities.
" "	11	3.1.41. We are supportive of improved monitoring of the overall performance of the planning system in meeting national goals. We support flexibility, sufficient development capacity, and accessibility as goals and look forward to future consultation opportunities to provide feedback.
7.10	12	3.1.45. We do not support the proposed Recommendation 7.10, and recommend its removal.
8.1	14	3.2.10a. Considering Government Policy Statements are conventionally high-level orientated, we recommend any Government Policy Statement on Environment Sustainability developed to be accompanied or preceded by a National Policy Statement (NPS) on environment sustainability as defined under Section 45(2) of the Resource Management Act 1991.
8.2	14	3.2.12. WDC supports, prior to the use of urban planning as a means of that more GHG, increasing robust empirical research is necessary.
8.3	14	3.2.13. We are supportive of encouraging more interaction between national and local government sectors and support the proposed recommendation that this should be developed as an agreed set of principles as provided for in the "Partners in Regulation" protocol.
" "	15	3.2.15. We ask the agreed set of principles be developed equally between national and local government sectors.
8.4	15	3.2.16. We support proposed Recommendation 8.4 on the basis that environmental effects on the community are being resolved to the community's satisfaction and ask the proposed recommendation to be revised to that effect.
9.1	15	3.3.3. We suggest encouragement of the use of spatial plans, but not making them mandatory.

9.2	15	3.3.4. We strongly support the establishment of a centre of resources that councils could draw on for analysis in the development of land use plans regardless of the proposed planning system changes.
9.2	16	3.3.5a. We suggest, but not limited to, the following topics to be covered in a centre of resources: <ul style="list-style-type: none"> • noise standards • mapping formats • template of standard definitions
9.3	16	3.3.6. WDC is supportive of working with central government to assess major programmes of urban infrastructure investment, but disagrees that formalising this process is warranted.
“ ”	16	3.3.8. We agree good practice ensures the proposed Recommendation 9.3 is already the status quo, minus a formal process, and we recommend the proposal is not required.
10.1	18	3.4.11. Therefore, we recommend the Commission’s proposed Recommendation 10.1 be removed as infrastructure costing does not currently adequately fit the RMA planning process.
10.2	18	3.4.12. We disagree with proposed Recommendation 10.2 as it infringes the principle of funding being a local decision. Council represents the community and the community should decide how and for what purposes their rates are collected and spent.
10.3	18	3.4.14. We disagree with proposed Recommendation 10.3 to enable councils to levy targeted rates on the basis of changes in land value as this effectively socialises costs for private gain.
10.4	19	3.4.17. By what means local infrastructure is delivered and funded is a local decision and we support proposed Recommendation 10.4 to be revised to encourage councils to scope all options in order to effectively and efficiently deliver local infrastructure.
12.1	21	3.6.2. It is necessary for the level of evidence required to be balanced against the size of the proposal and the council, and considering not all councils can afford nor have the organisational capacity to employ experts in economics and environmental science, we make the recommendation that central government provide expertise and guidance in these areas to support council planning teams in any future planning system. We suggest an email helpdesk is sufficient for this task, but are open to further suggestions.
12.2	21	3.6.4. We agree with proposed Recommendation 12.2 and suggest central government be assisted by bodies such as New Zealand Planning Institute and universities. Furthermore, we recommend the focus of learnings needs to be outside of larger well-resourced Councils like Auckland, Wellington and Christchurch, and on smaller Councils for planning efficiency insights.