



08 March 2016

File No: 3-OR-3-5

Steven Bailey
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New Zealand Productivity Commission
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By email: info@productivity.govt.nz

Dear Steven

Better Urban Planning

Thank you for the opportunity to comment on the Commission's issues paper on better urban planning.

The Council endorses the comprehensive approach which has been taken in the inquiry. We agree that the purpose of planning is to manage land use to provide for the needs of communities. At its most fundamental, it is about managing change – and thus applies to high-growth urban areas as well as towns experiencing low growth or declining populations. We agree that the current planning system is complex, in part because of the difficulties of co-ordinating decisions around land use, transport and infrastructure decision. In addition, there is considerable tension between allowing public participation (including engagement with Maori) and ensuring reasonable timeframes for those seeking to use land in different ways.

The issues paper poses the question whether the Government has taken sufficient interest in whether the procedural and policy requirements it has placed on local authorities are effectively delivering on the Government's Treaty duties. The Council is aware that those Iwi who are still in the Treaty claim process lack the capacity to engage with planning processes. We suggest that the Commission include consideration of the proposed reforms to Te Ture Whenua Maori Act which Te Puni Kokiri is leading.

The Council considers that a single regulatory framework would provide greater clarity for local councils, their communities and developers. The Resource Management Act, the Local Government Act and the Land Transport Management Act have different proposes, timeframes and processes. It would be advantageous to have a single piece of legislation. However, achieving such an integrated approach seems likely to depend on allowing greater discretion and ensuring that the framework reflects the differing circumstances of New Zealand's cities and towns. A key component in this framework is a comprehensive statement of national policy statements. The intended extension of these by 2018 to cover natural hazard risk management is an instance of this potential trend.

In developing this integrated approach, the Council considers that there is a need to clarify and extend the role of local authorities in facilitating local decision making and accountability. For example, the development of District Plans and the consideration of resource consent applications are often completed without substantive involvement from elected representatives. Often decisions are made by independent commissioners, particularly for smaller local authorities where the cost of training to become a commissioner is disproportionate to the required use.

An example of how this could work is that the development of Long Term Plans, which would provide the vision, and the framework for implementing this vision, including financial implications, with corresponding documents with specific details (district plans, bylaws, asset management plans, policies etc.). This system needs to be dynamic, allowing flexibility in policy/plan development, enabling the incorporation of the Maori world view, while ensuring a consistent public participation in processes and confidence that the outcome is not determined by financial resources. Such a system would need to be facilitated in a manner that reduces litigation and encourages dispute-resolution, including the opportunity for covenants and environmental offsets. The role of audit would be important in ensuring robust documents are created and implemented.

The Council hopes these comments are useful and looks forward to reading your draft report.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Andy Watson', written in a cursive style.

Andy Watson
Mayor of Rangitikei