

9 March 2016



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Better Urban Planning Inquiry
New Zealand Productivity Commission
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File ref: ROA 05 01
PAT:KMW

Dear Sir / Madam

SUBMISSION ON NEW ZEALAND PRODUCTIVITY COMMISSION: 'BETTER URBAN PLANNING' ISSUES PAPER

Thank you for the opportunity to submit on the New Zealand Productivity Commission (NZPC) issues paper 'Better Urban Planning'.

The Manawatu-Wanganui Region is predominantly rural and growth in our two largest urban centres, Palmerston North and Whanganui, is not rapid. Nonetheless Horizons Regional Council (Horizons) believes it prudent to participate in the NZPC review - while we are not directly involved in urban planning, systemic reforms have implications for Horizons' activities. There have been rolling reforms to national resource management and urban planning systems, and although the need for greater responsiveness is recognised there is also a need to let changes have an effect before continuing to alter the regime. It is our view that while further improvements may be desirable in future, the existing legislative regime is not 'broken' and a measured approach to further reform will be more practical than wholesale change.

Horizons supports the broad scope of the issues paper given the increasing scrutiny of, and amendments to, our national resource management system. We have chosen to submit only on those matters most relevant to our operations.

Integration of Relevant Planning Acts

An improved statutory fit and better integration between resource management, town planning, and infrastructure development would have a positive effect on Horizons. It would be of particular benefit to our planning, transport and river management teams who work most closely with the current planning regime.

Greater integration of the Resource Management Act (RMA), Local Government Act (LGA) and Land Transport Management Act (LTMA) would enhance the provision of sufficient industrial, commercial, and residential land by coordinating land use with the provision of public transport networks and flood protections. We would also support a move to improve consistency within the statutory framework, particularly in respect to the different weightings and timeframes for various processes under the LGA, RMA and LTMA.

Local Government Coordination

Urban planning could benefit from greater coordination between the different tiers of Government. Current arrangements mean that Horizons is responsible for public

Kairanga

Marton

Palmerston North

Taihape

Taumarunui

Wanganui

Woodville

transport services, whilst the Palmerston North City Council provides the supporting infrastructure. We acknowledge that past amendments to the LTMA have tried to strengthen the relationship between regional and territorial authorities, however a disconnect remains when planning for public transport.

Vertical coordination was also an issue when the RMA was first implemented. Some disparate practices within the current resource management system which arose due to an initial lack of national direction remain. Horizons supports the use of clear national direction on overarching matters, to ensure an efficient and effective resource management system should further reforms take place.

Lessons Learnt and Relevance Today

The current resource management system has contributed to positive environmental changes throughout the Horizons Region. Water quality has improved in many places due to more effective management of point source discharges, air quality has improved, and there are signs that soil conservation efforts are having a positive effect on soil retention and water quality. However, we still face challenges from the effects of intensive land use, particularly around soil and nutrient management, biodiversity, and changing land cover.

It may be time to reconsider whether the original aim of the RMA is still valid today. Limiting the scope of land regulation to managing effects within environmental bottom lines limits consideration of the wider social, cultural, economic and ecological impacts of urban and environmental planning decisions. Despite being previously removed from the LGA, Horizons considers that any reform of the resource management system should take these four well-beings into account.

We also consider that any proposal involving a separate urban planning regime will need to enable consideration and assessment of environmental effects. This will be a particular issue for activities at the urban / rural boundary.

Horizons acknowledges that work has been done at the national level which deals with some of the overarching issues associated with the resource management system. Horizons has supported the establishment of more national direction in the form of National Policy Statements (NPS) and National Environmental Standards (NES), whilst current amendments to the NPS for Freshwater Management and the Resource Legislation Amendment Bill (RLAB) are targeted at perceived issues with the resource management system. The effectiveness of these measures in addressing systemic issues cannot be fully evaluated until after they have been implemented.

A Mixed Toolbox: Rules, Economic Mechanisms and Private Property Rights

Horizons welcomes the potential to expand the range of planning approaches available to local government. However, there is a notable emphasis on market-based mechanisms within the issues paper. Whilst Horizons supports an investigation into their use and their potential benefits for efficiency and adaptability, we have reservations about losing the direct ability to regulate environmental effects and thus, outcomes. We are also mindful of the potential for unintended consequences associated with the introduction of new planning tools. To ensure that this does not occur, we ask that a balanced approach be taken; providing Council with the flexibility to use both market- and rule-based mechanisms would ensure that local solutions to planning issues can be found.

However, while the introduction of economic mechanisms and private property rights may provide for more flexible responses to planning issues, we are unsure how they fit with local community input and collaborative processes.

Consultation

Consultation is an integral part of resource management in New Zealand. Horizons consider that the role, scope and principles required for consultation are determined by societal views. Thus, requirements for consultation should be flexible, allowing Horizons to adapt to each situation and evolving community expectations. We acknowledge that this desire for flexibility has been incorporated to some extent into the RLAB, with provision for both a streamlined and collaborative approach to community engagement.

The issues paper also requested feedback on recognising and providing for the interests of Maori and the Treaty of Waitangi. We do not presume to speak on behalf of iwi and hapu, but note that engagement is a crucial part of the planning process.

Yours sincerely



Michael McCartney
CHIEF EXECUTIVE