

No.	Organisation	Group	Topic						Misc
			Consents and appeals	Plan Making	Central Government direction	Legislative interface	Complementary measures	Fundamentals	
1	Auckland City Council	Council			Increase flexibility on NES on telecoms to enable councils to exercise some control over location and methods for telecoms equipment.				
2	Christchurch City Council	Council	Enable council to appoint member to the board of inquiry if EPA or call-in is used. Clarify role of council once application called in.	Enable Council to amend private plan changes. S113 requirements for decisions are excessive for most non-notified applications.		Strengthen links to strategies prepared under other legn - LGA, LTMA etc. Amend s88A(2) so only the proposed plan on plan that exists before close of hearing must be had regard to.	Govt should contribute to training and consistent application of RMA enforcement across NZ. Abatement notices ineffective as activity can continue during appeal - enable council to carry out work to remedy significant impacts. Allow producer statements for professional evidence.	Delays occur due to the RMA being an inflexible rules-based system where sometimes process is more important than outcomes.	
3	South Waikato District Council	Council	Support prohibition of objections on the basis of trade competition. Support 'priority consenting' of major infrastructure so long as TLA's included in process. Support reduction in number of categories. Introduce category that provides for activities being permitted where written approval of affected adjoining land owners obtained. Reduce number of 'tests' to meet in gaining approval. Enable controlled activities to be non-notified. Increase the statutory timeframes for processing applications. Remove Ministerial veto rights on coastal consents. Introduce powers to reject frivolous objections. Replace Env Court procedures with an Inquiry of the Court members.	Enable single district/regional plans but not to be made mandatory.	Support , in principle, the establishment of EPA.			Oppose limiting 'environment' definition to natural and physical resources. Replace broad references to ToW with specific requirements for Iwi consultation.	Introduce more proactive community education promoting benefits of RMA.

4	South Taranaki District Council	Council	<p>Reduce category number - specifically remove 'restricted discretionary' activity, but need more than just Permitted, Discretionary, Prohibited. Mandate the involvement of local authorities if major infrastructure projects were processed by EPA. Introduce powers to reject frivolous objections. Reinstate Env Court power to award security for costs. Further limit the Parties Notified as part of the Limited Notified Pathway. Align a timeframe for requesting further information with the notification requirement of 10 working days - s95. Prohibit the use of s37 and s37A to extend processing timeframes. Address hearing delays at Env Court. Abolish de novo Env Court hearings. Limit circumstances in which new evidence can be presented to Env Court.</p>	<p>Oppose the establishment of an independent complaints mechanism. Encourage but not mandate single district/regional plans.</p>	<p>Supports central guidance on scientific-based matters (NES and process matters (NPS) but not for matters such as housing affordability etc.</p>			<p>Agrees 'environment' definition should focus more on natural and physical resources as long as economic and social values catered for in s6 or s7. Either, provide more legislative guidance on the ToW principles or introduce specific Iwi consultation requirements, the same as would apply to all parties. Provide capacity funding for Iwi akin to the legal aid fund.</p>	
5	Malborough District Council	Council	<p>Define the purpose of the s42A report. Remove affected party approval for anything lower than discretionary. Introduce a filing fee for submissions. Require submitters to provide proof of standing. Increase the fee for appeals. Enable council to refuse an application with no right of appeal after 90 days of no progress. Review usefulness of transitional provisions and look to delete from the RMA.</p>	<p>Remove s32 to reduce time required to prepare plans. Broaden s19 to include anything beyond challenge deemed to be operative, not just rules. Remove designation provisions and place in Public Works Act.</p>	<p>Examine the MfE funding of special interest groups.</p>		<p>Provide guidance on the function of auditing the assessment of env effects with respect to s5 - specifically for the role of the officer and technician.</p>	<p>Amend s5 to: sustainable management of natural and physical resources; enabling communities to appropriately use physical and natural resources; the preservation of the environment for future generations. Recommends the removal of s6, 7, 8 and have s5 supported by NPS. Remove special status of Minister of Conservation from the Act. Oppose the re-defining of "environment".</p>	
6	Hurunui District Council	Council	<p>Remove need for formal hearings where affected parties have given approval and the activity is restricted discretionary or less. Enable applicants to refer direct to the Environment Court applications of regional or national interest.</p>	<p>Remove the further submission provisions of the Act. Allow people who feel their property rights may be affected by plan change to join the process up to when Council decide a hearing date. Remove the efficiency and effectiveness reporting and just use the 10yr review process</p>					

				coupled with the ability for private plan changes to review the policy documents.					
7	North Shore City Council	Council	Reduce trade competition profit protection by enabling council on balance of probabilities to ignore submissions for trade competition reasons. Good submission on why complaints and waiver mechanism for late consents is bad idea. Should have 30 day processing period.	Remove or restrict further submissions to plan changes - though people should still be able to correct errors in prior submissions. Clarify that an electronic version of a Plan can be official version.		Clarify links between RMA, Building Act and LGA, e.g. degree of consistency between RPS and LTCCPs.		Reduce duplication of functions between regional and territorial councils re urban stormwater, sediment and erosion control, stream crossings in air space above stream surface and flood standards set by regional councils, TAs and Building Act. Oppose change to defn environment - good discussion.	
8	Taranaki Regional Council	Council	Legislation non-notification some consent categories or leave to Council discretion. Allow notification challenges to be heard in Env Ct. Simplify consent processing and decision / apperwork requirements for simple proposals rather than the same track for all consents regardless of size. Aim to strengthen initial Council decision and reduce de novo appeal rights. Enable Councils to consent direct referral to Env Court. Delete RCA category. Clarify role of local authorities once application called in incl clarity of charging provisions. Require inclusion of local council reps on call-in panels. Require leave of Principal E Court Judge to appeal appeals (re trade competition). Remove trial by jury. Increase penalty from \$200,000. Execute search warrants with a JP present. Extend period for laying charges to 12 months. Oppose free late consents - someone always pays, perverse outcomes, applicant may be contributor to situation.	Remove further submissions phase. Remove 10yr obligation to review plans. Remove de novo hearings on plan provisions. Prohibit appeals on entire plans or plan changes. Make on decision on many submissions, not one on each. Monitor effectiveness of plans, not efficiency. Remove s32 and leave consideration of options etc to LGA decision making principles. Remove Minister of Conservation approval of RCP. Developing single plan may be huge task and not necessarily make things any easier.	National instruments should be used sparingly and in a way that will make a practical difference - experience to date is that they are broad, unhelpful and not based on science.		Legislative reforms won't improve resource management practice unless if the means of implementation remain inadequate or inconsistent. The legal professional has substantial interest in long and complicated processes - financial incentives through unnecessarily litigious processes.	Oppose changes to defn environment.	

9	Environment Bay of Plenty	Council	Amend s357 to reduce admin burden - eg don't require hearing if one isn't needed. Allow limited notification consents to be progressed once written approval or submission received f notified parties.		Govt identify what landscapes, industries etc are of national importance. Amend RMA to enable councils to implement national directives exempt from Schedule 1 processes.			Remove coastal occupation charges from Schedule 1 process and replace with LGA special consultative process. Clarify is s384A permits are subject to charges.	
10	Thames-Coromandel District Council	Council	Oppose reducing categories from 3 to 5. Oppose having penalties for consents which exceed statutory timeframes, and having an independent body to administer. Remove Minister of Conservation veto rights on coastal consents. Support reduced s104 assessment or no formal reporting for 'minor' consents where neighbours approval is given. Support explicit powers to reject frivolous objections/submissions. Ensure the involvement of local representation in any change of process for major infrastructure projects. Prohibit applicants making amendments to a proposal after public notification has occurred. Reduce influence of affected parties and written approvals on applications. Increase emphasis on planning merit of applications. Introduce consent 'waivers' in District Plans for specified activities similar to the Outline Plan waiver process. Provide a system for approved contractors in minor areas of consents (tree trimming).	Prohibit whole of plan appeals. Remove further submissions from plan making process or provide local authorities power to restrict extent to which these are called for. Amend ability for notification challenges to be heard by Env Court rather than High Court. Introduce producer statement approach for professional evidence. Clarify legal ability for council to charge fees for monitoring and enforcement. Increase enforcement fees. Clarify submitters 'standing', and the role of 'public interest groups'.	Support greater central govt direction while maintaining local input into decision making.		Support an appeals process that enables timely decisions (~2yrs) to provide certainty for communities. Require appellant to settle appeals within 2 years of lodgement with Env Court. Increase the lodgement fee appeals to the Env Court.	Oppose narrowing definition of environment. Support clarification of consultation obligations in terms of ToW. Support use of internet but not sure how it could be required in legislation. Amend s92A(a)(3) not allowing applications declined due to refusal of further information to be appealed to the Env Court.	
11	Environment Canterbury	Council	Introduce merit-based allocation of resources rather than first-in first-served consents. Require better info up front in application rather than waiting for appeals stage. Remove de novo E Court hearings. Enable strategic assessments for large scale projects. Introduce 2 timeframes for consent processing eg 15 days for simple and 35 days for complex. Require all consents for an activity to be lodged at the same time. Enable consents required by 2 or more councils, to always be considered together. Hear notification challenges in E Ct, no High Court. Remove RCA class of consent. Review s128(1) to clarify that consents can be reviewed to fix annual volumes on existing water permits (rather than having to wait for them to expire).	Review the further submission process and req to do summary of submissions (put subs on the internet instead). If a district plan is to be reviewed, all private plan changes applied for are included in that plan review. Improve synchronisation between private plan changes and consequential variations to proposed plan. Enable councils to make overall decisions based on submissions received,	Include more deemed provisions in NPS and NES, rather than directions requiring amendment to plans. Give more clarity on who is responsible for contaminated land management - esp orphan sites and passive leakage.		Require professionals preparing consent applications to belong to a professional institute.	Retain existing definition of environment. Need stronger support in RMA for precautionary and adaptive management rather than legal evidence in the court. Clarify roles of regional and territorial councils re some overlapping areas - eg where both councils are managing land use.	Increase infringement fines and allows increases for subsequent offending. Change burden of proof to balance of probabilities for infringement fines.

				rather than on each submission. Don't let people effectively ask for plan changes through submissions. Clarify that monitoring of plans is about effectiveness not efficiency. Increase 5yr lapsing period on designations to life of plan. Clarify weight to be given to proposed changes to RPS.					
12	West Coast Regional Council	Council	Support security for costs. Remove Min Conservation veto on coastal consents and approval of coastal plans. Remove RCA category. Remove requirement of DoC to advocate in RMA processes. Deal with Conservation act concessions and RMA consents in one go.			On West Coast amendments to Conservation Act would be more important that RMA changes.			

13	Environment Southland	Council	<p>Introduce depositions hearing stage to Env Court - to winnow out vexatious etc appeals. Replace E Court with tribunal with commissioners - focus should be planning not legal procedure. Remove jury trial option. Appeals on infringements should go to District Court and outcome should not be criminal conviction. Enable council to refer consents to E Court. Remove administrative charges from RMA and put into LGA. "Free consents" don't work - the ratepayer just ends up with the costs "someone always pays". Delete RCA category. Remove controlled activity category. Fix problems with s124 on allocation of finite resources. Where consent called in or referred to E Court leave processing to relevant local authority. Introduce one timeframe for consent process rather than lots of little timeframes to add up. Make s84 duty to observe own plans etc a duty in s30. Increase maximum \$200,000 penalty. Raise infringement limits to \$20,000 and include a schedule of fines in relevant plan - easier to work through infringement rather than offence provisions. Should be an offence not to comply with consent. Extend limitation period for laying information to 12 months. Allow search warrants to be exercised in company of JP if no constable present. Expand s314 powers to allow costs to be sought with greater clarity, and include reason for recovery of legal expenses. Scrap interim enforcement orders but apply s320 process to application for enforcement orders and follow s325 appeals process.</p>	<p>Remove further submissions phase. Remove 10yr obligation to review plans. Introduce an interim rules process so can address pressing issues (eg stock access to waterways) without waiting for plan change. Remove decisions on individual submissions. Look at standing rules for plan submitters. Streamline s32 process - is more focused on process than good outcomes. Remove Min Conservation approval of RCPlans. Allow PPChanges and consent applications to run together, and more scope to refuse PPC applications. Allow incorporation by reference of heritage listings (which are always changing) - currently cannot because considered a technical matter. Compulsory for councils to consider combined plans. Put all non-urban land use in RPS and devleop land plans - removes overlap of RPs and DPs. More NPS and NES and model or standard plans and policies "would have saved a fortune" - similar matters are dealt with slightly differently by each council through Sched 1 process - inefficient and inconsistent. Plans should be more</p>	<p>Water management - central government needs to "draw a line in the sand" about land use intensification/economic development vs environmental protection.</p>	<p>Clarify responsibilities for pest management. Remove requirement to get separate approval under HPAAct - leave in RMA.</p>		<p>Concerned by comments that EPA will "steal" best planners. Try collaborative, partnership approach to policy - regions helping prepare national policies, coordinated by EPA (or whoever)...or let councils do legwork for E Court referrals, rather than new agency in Wellington.</p>	<p>Delete ability to create / apply for Water Conservation Orders - cuts across Water Plan provisions, "jurassic" pre-RMA remnant. Make it easy to amend WCOs to achieve integrated catchment management. Need to determine if non point-source pollution from normal farming operations is controlled by s15 - currently don't know if can include plan rules to address the issue. Have more than 5 year time limit for designations. Add new s36 charges to include permitted activity monitoring and non-compliance w regional plans. Address interface with Health Act re "nuisance" vs "noxious". Set coastal occupation charges in LGA not RMA - can alter annually through Special Consultative Process.</p>
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				<p>outcome oriented rather than technical aspects of managing environmental effects. There is too much in plans, and they are user-unfriendly - can leave out much of the high level stuff and discussion / justification - main focus of plan should be listing the rules for activities. Remove de novo appeals to E Court - Council should make final decision and big corporates etc should focus on early involvement not waiting for appeal. Prohibit appeals on whole plans and plan changes. Remove requirement to monitor efficiency of plans - effectiveness is okay.</p>					
14	Greater Wellington Council	Council	<p>Disagree with fewer consent categories. Don't see how complaint mechanism would speed up process - and any waiver of fees is ultimately a cost to the ratepayer. Hard to see what value priority consenting adds beyond call-in process. Support EPA having power to prosecute Crown - Councils should also have power.</p>	<p>Remove requirement for further submissions. Remove 10yr obligation to review plans. Prohibit appeals on whole plans. Remove need to decisions on individual submissions. Remove Min Conservation approval of coastal plans. Allow PPC and consent applications to be dealt with concurrently. Support more unitary plans, but shouldn't be compulsory.</p>	<p>Support greater national direction as long as it adds value - most identify and fund costs of implementation.</p>		<p>Commerce Commission could play a role in dealing with trade competition. Support more use of internet - but note resources required.</p>	<p>Disagree with change to defn environment.</p>	<p>Simplify or remove s32 requirements.</p>

15	Hutt City Council	Council	<p>Clarify process of priority consenting of major infrastructure projects by Environment Court, as local decision-making is paramount. Allow time for recent amendments to Ministerial call-in power to "bed in" as this may address the above. Legislate for a presumption for non-notification on controlled/discretionary activities. Reconsider appropriate appeal path for consents/plans, including role of council hearing, while considering additional training/financial requirements this may mean for councils.</p>	<p>Enable ability to have joint regional / district plans but don't make mandatory as in some instances could restrict local decision-making. Increase the 5yr lapsing period on designations to 10yrs with the discretion to shorten the lapsing period.</p>			<p>Clarify the legal ability for Councils to charge fees for monitoring and enforcement. Develop an approach to seeking realistic bonds from developers to ensure that remediation issues left by failed developers can be addressed.</p>	<p>Ensure a coherent framework that outlines the purpose and rationale of the suggested reforms and its associated implementation process.</p>	
16	Local Government NZ	Council	<p>Oppose proposal to reduce consent categories from 5 to 3. Consider introducing a "simple" category. Clarify the consultation requirements with Iwi, building capability and capacity of Iwi better than removing s8. Reconsider what are appropriate timeframes for different consents, rather than having independent complaints mechanism. Remove Minister of Conservation power of veto on coastal consents though encourage review of DOC's advocacy role. Reinstate security for costs. Support ability to reject frivolous objections, but provide guidelines and clarity on the use of those powers. Recognise major infrastructure projects may need alternative process but let local authorities carry out the task. Consider dual consenting to reduce regional/district overlap. Agree to system for approved contractors as long as good industry standards/audits etc. Agree Crown should be liable for prosecution but not necessarily through EPA, maybe local councils. Clarify role of local authorities when applications called-in - need to retain local ownership of process. Develop clearer criteria for when intervention powers will be used and guidance for how a decision is made between intervention options. Limit appeals to matters of law. Strengthen timeframe for s274 parties to join. Remove s274 parties ability to continue if principle parties are agreed. Abolish de novo hearings. Legislate a presumption for non-notified on controlled/restricted discretionary activities. Reinstate "standing" in order for a 3rd party to be involved in a case. Review reporting requirements for decisions on minor proposals. Reduce ability and scope of appeals to Env Court. Clarify legal ability for councils to charge monitoring and enforcement fees. Increase enforcement penalties. Introduce producer statement approach for professional evidence in support of applications. Enable councils to cancel applications if been on hold for extended period. Introduce total consent timeframe - not step by step. Formalise a project planning aspect for complex consents.</p>	<p>Support the prohibition of objections re trade competition. Encourage single regional/district plans but not mandatory. Remove the further submission provisions of the Act, or provide local authorities power to restrict the extent to which further submissions are called for. Options to improve private plan change process: link to upcoming plan review; council to amend without lodging submission; request further info on private plan after it is notified; greater power to reject/accept applications for private plan changes. Improve flexibility by enabling council to alter proposed change during the plan process, make overall decisions (as per LGA), improve clause 16 and 20A, give hearing panel chair ability to select submitters to give evidence at hearing.</p>	<p>Clarify the purpose of the EPA, how it may affect existing institutions and that it will not compromise the principles of local government and the RMA. Develop a broad strategy to give certainty on future use of NPS/NES, their purpose, common definitions, greater use of s55. Enable councils to opt out of NPS/NES if need specific local response. Clarify NES provisions - admin roles, cost/benefit analysis. Enable automatic insertion of NES into consent conditions so no need to review consents.</p>	<p>Improve clarity in LGA, RMA and LTMA interface.</p>		<p>Retain the reference to "people and communities" in the definition of environment. Need it for urban planning and has significant case law. Enable use of internet in RMA processes, but lack of broadband could constrain some regions. Confirm that e-versions of plans and policies can be an official version.</p>	

				<p>Remove right to appeal policy. Prohibit appeals against whole plans. Clarify monitoring requirements to effectiveness of plans, not efficiency. Consider a process for councils to input in each others plans outside submission/appeal process. Remove 10yr review. Remove obligation to prepare seperate s32 reports. Remove requirement for reasons and explanations in RPS contents</p>					
17	New Plymouth District Council	Council	<p>Alternative appeal resolution framework - continuum of small claims tribunal, appeal to a planning commissioner, then appeal to Env Court only on significant cases.</p>	<p>Draft an outline model plan with which all plans need to conform to a degree (eg layout, approach, content). Require an audit of new plans by EPA, OAG 4 eg before they are final.</p>					
18	Otago Regional Council	Council	<p>Too many court cases relate to process. Introduce measures to discourage anti-competitive submissions and appeals on consents and plans.</p>					<p>The fundamental issue is the implementation of the Act, though amendments can also make processes easier. Provide the Courts with an inquisitorial, forward looking, proactive approach to resource management, similar to that required of the councils so both have same fundamental</p>	

								approach.	
19	Waipa District Council	Council							
20	Wellington City Council	Council	<p>Limit third party appeal rights to those directly affected, remove right of s274 appellants to continue w appeal when principal parties have met solution. Let Env Court strike out appeals on basis of trade competition. Allow 40 working days to deal with complex applications, clarify overall timeframe for consideration of notified applications. Introduce a lower-level type of appeal to Env Court without full hearing, or appeal to Env Court only on points of law. Introduce a streamlined process for simple consents - eg for homeowner application for minor works where neighbour consent given. Reverse presumption of notification for controlled and restricted discretionary activities.</p>	<p>Remove s32 reports for District Plan changes. Remove 5 year monitoring requirements for plans. Have a one-stop hearing on plan changes, and appeals to Env Court only on points of law.</p>	<p>Need greater direction on quality urban development outcomes - on which the Act is largely silent. Prepare standard list of national definitions that apply unless amended by individual councils.</p>		<p>Need to look at quality of consent applications - often of low quality. Under the ELA fund ensure that appeals can actually achieve desired outcomes and that case has merit. Allow plans to be placed online to avoid paper copies. There has been a growth in non-statutory urban policy - these should be linked into the Act.</p>	<p>Remove requirement for SOE monitoring. Consider more unitary authorities to remove duplication to process and costs.</p>	
21	Papakura District Council	Council	<p>Enable cancellation of consents not picked and and paid for w/in 3 months. Enable notification of applications that undermine spatial landuse planning. Provide for some controlled activities to be dealt with under a simple assessment process not requiring complex s94 and s104 reports. Allow Councils to strike out vexatious / frivolous objections. Only affected parties can make submissions. Non-submitters cannot join an appeal. Develop NZ-wide template application forms. Amend s92 re how to refuse applications without adequate info, and how to deal w matters of clarification.</p>	<p>Remove duplication of consents between regional and district plans. Link district plans in legislation to LTCCP, and to other planning tools incl structure and local areas planning. Remove further submissions, give Council right to exclude vexatious / frivolous submitters, remove s274(i) rights, increase appeal lodgement fee to Env Court. Allow Council to refer some technical matters to Env Court. Private Plan changes</p>	<p>More NES to give consistency across NZ - e.g. for coastal erosion and mitigation structures, earthworks, code of construction for subdivisions, sediment control etc etc (p2). Govt develop a web portal for lodging and tracking consent applications.</p>	<p>Only issue Building Act consent once resource consent granted.</p>	<p>Introduce a national certification of products / construction material - remove need for each Council to re-debate methods or products. Enable RM professionals to be recognised in legislation as a professional.</p>	<p>Don't change defn of environment.</p>	

				can't be lodged within 2 years of review date of district plan. Allow 40 working days to process complex applications.					
22	Taranaki Regional Council	Council	See B G Chamberlain (same submission)						
23	New Plymouth District Council	Council	Support prohibition of objections on the basis of trade competition. Oppose reducing consent categories from 5 to 3. Oppose waiver of consent processing fees if time frames breached. Support local authorities retaining hearing and decision making for all consents, including major infrastructure projects. Clarify local authority role in called-in applications. Introduce charging provisions for local authorities where applications have been called-in. Improve provisions for limited notified consent applications for greater clarity. Increase timeframes for decisions on non-notified consents. Retain charges for monitoring and enforcement of RMA related activities. Introduce producer statement approach for professional evidence.		Ensure local communities can still be involved if an EPA were to undertake priority consenting. Provide better guidance through NPS and NES and government submissions rather than using call-in procedure.			Enable use of internet in RMA processes, but don't make it mandatory.	Amend s327(3) from "72 hours" to "60 working days".
24	Far North District Council	Council							
25	Kaipara District Council	Council	Simplify the process for minor applications. Introduce the presumption of no affected parties to a controlled activity. Simplify recording requirements for decisions on non-notified applications. Introduce that only the party who has withheld consent is served with notice if 'limited notification' provisions are used. Clarify councils right to charge for monitoring, enforcement and objections. Introduce producer statement approach for professional evidence in support of applications. Support one regional/district plan but needs to also include NPS.	Develop a national lexicon of planning terms.		Include building consent as a related consent under s91		Enable use of internet in RMA processes, but lack of broadband could constrain some regions.	

26	Waimakariri District Council	Council	<p>Support prohibition of trade competition objections, though query need to make further changes as Act has already been amended to address this issue. Support simplifying the consent categories, but not sure reducing the categories will necessarily achieve this - but if this happened - support the removal of 'controlled' and 'restricted discretionary', and strengthen the threshold for 'non-complying'. Oppose introducing independent complaints body to discount or waive consent processing fees - not consistent with trying to simplify the process. Support removal of Minister of Conservation veto on coastal consents. Reinstate Env Court power to award security for costs. Remove de novo hearings. Oppose new powers to reject vexatious and frivolous objections as streamlining of hearings and limiting the scope for lodging appeals should reduce these objections. Support with reservations priority consenting of major infrastructure projects - if applicant or authority can go direct to Env Court for initial hearing this would streamline the system for large proposals. Support with reservations a system for approved contractors in areas of minor consents. Support with reservations 'simple' consent category - motivations of neighbours who give approval may not be consistent with good env outcomes.</p>	<p>Give attention to the overlap between responsibilities of regions and districts with respect to control of land and potential for dual consenting, rather than having single regional/district plans. Oppose removal of further submissions. Support improving private plan change process and linking with upcoming plan reviews. Oppose increased flexibility for councils during planning process - legal documents and need to maintain integrity in the decision-making process. Support prohibition of appeals against whole plans. Support monitoring requirements to effectiveness, not efficiency.</p>	<p>DOC only involved when effects on DOC estate, MfE involved in all other matters, NZ HPT involved to review plans to monitor protection of heritage resources. Neither support nor oppose EPA for NPS, NES and priority consenting - wouldn't be needed if could fast track to the Env Court, would appeals to the Env court of High Court?. Neither support or oppose EPA power to prosecute Crown for breaches of resource consents. Support with reservation greater use of NPS and NES - would have been more useful in early stages of developing Plans and Statements - now could lead to unproductive work to amend documents and making resource management more complex. Enable NPS to insert into plans but also have local flexibility to circumvent the requirement to formally change plans.</p>	<p>Improve the LGA, RM and LTMA interface - should be able to take into account documents prepared under other statutes when reviewing plans and deciding on consent applications.</p>	<p>Support with reservations having producer statement approach.</p>	<p>Oppose a change to the definition for environment. Support replacing broad TOW references with specific Iwi consultation requirements. Support increasing designation lapsing period from 5 to 10yrs.</p>	<p>No particular advantage to encouraging the use of internet to replace paperwork requirements.</p>
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27	Auckland City Council	Council	<p>Give councils more discretion on whether to notify. Allow positive effects of activities to be considered re notification decisions. Allow all controlled and restricted discretionary applications to be non-notified. Allow only directly affected persons or groups to submit. Legislate a class of activity that is permitted when performance standards are met. Give decisions and reasons only re controlled and restricted discretionary consent applications. Controlled and RD activities not subject to Pt 2 RMA. Mandate in law the permitted baseline, rather than in case law. Require fees upfront as prerequisite of lodging, processing and issuing consents. Environment Court - set a realistic filing fee higher than \$55. Remove ability to appeal council decisions on submissions to plan reviews and changes, add ability for call-in. Delete need for replies to appeals. Require security for costs. No discretion for other parties to join appeal after first 30 days. Have a scale of costs and stronger presumption that costs follow if party loses.</p>	<p>Only lodge a further submission if haven't lodged one already (stops repetition). Let councils refuse private plan change requests with 12 months of notification of new plan. Designations should sit in both district and regional plans. Requirements process should only have to improve work in principle and secure land - detailed design should be in outline plan process.</p>	<p>Use NES and NPS to encourage national standard approach to rollout of infrastructure. NES need some change to link better with parts 3,5 and 6 of the RMA.</p>				
28	Central Hawkes Bay District Council	Council	<p>No benefit in reducing the number of consent categories - wont affect the processing time. Rather than an independent complaints body applying penalties, it could assist with advising on best practice and improved performance. Reinstate Env Courts ability to award security of costs and support presumption against de novo hearings. Encourage use of prehearing conferences to narrow issues.</p>	<p>Support greater consistency between plans in same region with similar or linked issues, but cautious about combining regional and district plans as subject areas are often disparate.</p>	<p>support establishment of EPA and NPS, particularly on major issues that have national significance or require consistency across the country.</p>			<p>No benefit in narrowing the definition of environment. Although iwi consultation is required, can be hard to find anyone from local iwi to enter into consultation with.</p>	

29	Waikato District Council	Council	See little benefit in changing consent categories, and having to make subsequent plan changes. Encourage applicants to do pre-application meetings with council planners. Revisit processing timeframe for large, more complex applications. Require consultants and surveyors to have accreditation in order to participate in the resource management process. Rather than waiving the fees for breaching statutory processing times, provide council with advice, support and resources to improve the process. Support the removal of Ministerial veto rights on coastal consents - utilise NZCPS to provide policy direction..	Support power to reject vexatious or frivolous submissions/objections on plans, consents and Notice of Requirement to designate land - and requests council be given guidance on this matter. Plans by nature are complex - supports initiatives that benefit the plan user.	Institutional changes to deal with major infrastructure 'priority consenting' may or may not speed up the process, and need to maintain local govt to make local level decisions. Also Council will have the responsibility to represent the community in the consenting process - should be financially supported for it's involvement in the process. Clarify whether the establishment of an EPA would remove the Ministers power to call-in under the Act. Support EPA to develop NPS and NES, though query implications of EPA on local decision-making and request national guidance on this.		Support compensating affected persons generously whose land is taken for infrastructure development.	If the definition of 'environment' is changed, appropriate protection must be accorded to 'people and communities' and 'ecosystems' through other means to ensure integrated decision-making. Require that iwi respond within a reasonable timeframe with constructive feedback from consultation.	As per the 2005 amendments, for the purpose of iwi consultation, council are still to be provided information under s35A to then provide to iwi and hapu. Supports urban design initiative and it to include all built environments.
30	Environment Southland	Council	See Ciaran Keogh (same submission)						
31	Manukau City Council	Council	[long discussion on individual points of proposed amendments]			Need to tie in RMA functions to associated legn such as LGA and also review of Auckland governance structures.			
32	Kaipara District Council	Council	See Jack MacKerchar (same submission)						
33	Gisborne District Council	Council	Oppose change to # consent categories - better to simplify and clarify s94 which has a bias toward notification. Oppose complaints mechanisms and waiving of consent fees - would lead to poor decisions, higher proportion consents declined etc. Support removing Min Conservation veto rights on coastal permits. Support limiting scope of Env Court hearings (not de novo), security for costs and strengthening JR power of Env Court.	Would like option of incorporating regional policy statements into regional and district plans - add little for unitary councils. Remove s35(2) requirement to review efficiency of plans and policies - very resource intensive. Remove requirement to review plans 10 yearly - arbitrary requirement. Limit appeals on plans specific concerns (not whole) plan, and to the decision process, not de novo hearings.	Support national instruments where can be applied commonly across all regions - but when significant local differences can be a huge burden on council resources for little gain. Should be more use of s55 powers to amend policy statements and plans without Sch 1 process.		Can't support putting important info just on internet where much of their community has poor internet access. Need central govt support to implement new national instruments. Support accreditation systems - questions about monitoring and enforcing their operations.	Oppose changing the defn of environment. Oppose changing Maori consultation provisions. Role of EPA should be supporting councils and communities to make decisions.	

34	Environment Canterbury	Council	Incorporate the further submission process into the hearing and presentation of evidence stage						
35	Northland Regional Council	Council	Strengthen provisions surrounding objections for trade competitors. Strengthen provisions to reject frivolous appeals. Enable direct referral of priority consents to Env Court. Introduce time limits for s92 requests Strengthen enforcement provisions. Oppose reducing the number of categories. Oppose provisions for discounting or waiving of consent processing fees where statutory processing times are breached. Reinstate security for costs and grant powers to reject frivolous appeals. Retain major infrastructure projects decisions at the local authority level with option of requesting central govt involvement, or provide for direct referral to Env Court. introduce timeframe for further information requests s92.	Simplify First schedule to facilitate the consolidation of planning framework. Remove Minister of Conservations involvement in Regional Coastal Plans.	Greater use of s55 provisions to implement National policy documents. Enable Whole-of-Govt submissions on consent and plan changes. Support establishment of EPA being deferred to phase 2. Better utilisation of s55 where appropriate. Limit DOC's submissions and advocacy to the Crown estate. Introduce a whole of Govt approach to submissions on plans changes and consent applications.		Simplify the charging of fee for private benefit of public space in the coastal marine area. Increase enforcement penalties, and time for enforcement action from 6 to 12 months.	Establish an independent RMA complaints procedure. Undertake cost/benefit analysis before changing the definition of "environment". Clarify and formalise consultation requirements with Moari. Strengthen requirement to undertake economic cost/benefit analysis under s32.	Advise councils to refrain from any major re-drafting of planning documents pending clarification from Govt on this reform of the RMA as some will be underway, or due.
36	Porirua City Council	Council	Develop a 'best practice' for applications. Encourage applicants to utilise pre-application meetings with council. Enable council to extend statutory timeframes for processing where applications come in incomplete.		Utilise NPS to provide guidance on dealing with competing Part 2 matters. Ensure NPS assist council to resolve conflicts between matters of national importance and matters of local importance.	Provide training/education to private developers on the interrelationship of the requirements between the RMA and Building Act			Consider reviewing s40 of the Public Works Act to provide local and central government with greater flexibility to manage land resources.
37	Wanganui District Council	Council	Change presumption of the Act to non-notification. Allow councils to deal with permitted activities that don't comply with one or more technical conditions without need for resource consent - in practice they will be approved. Reduce ability to apply for JR of a consent. Tighten up s37 ability to extend time. Reduce time periods - 15 days to submit on notified applications, 10 days on limited notification, 10 days to make an appeal. For limited notification where applicant has consent of some affected parties limit standing to those affected parties that have not consented. Prohibit submissions from parties involved in same type of business as the applicant.	Reduce plan change timeframes to make submissions and appeals.			Introduce producer statements similar to Building Act.		

38	Hamilton City Council	Council	Support priority consenting, if can retain ability for public to be involved. Agree with refund for late consents - already do it in Hamilton. Enable consent authorities to determine if 3rd party appeals are frivolous etc.	Eliminate further submissions on plans. Streamline the number of consents that need notification.				Oppose changing defn environment. Support changed ref to Treaty principles to more focus on consultation. EPA - need to balance high level regulatory functions with local considerations.	
39	Tararua District Council	Council	Clarify process of priority consenting of major infrastructure projects by Environment Court, as local decision-making is paramount. Blanket application of call-in for major infrastructure not necessary. Introduce 'simple' applications without formal reporting and are non-notified. Introduce power to reject frivolous objections/submissions. Enable council under s36 to charge where objector/submitter fails to contribute to process causing delay and cost.	Abolish 'further submissions' process in plan preparation. Address the requirement that District Plan decisions are limited to the precise scope of decisions to avoid unnecessary re-notification where there will be no compromise of overall community interest.				Increase capacity of Iwi, especially those with current settlement claims yet to be decided.	Support LGNZ principles promoted in 2004 in addition to these comments.
40	Upper Hutt City Council	Council	Don't support change to # consent categories.	Streamline the entire Schedule 1 process - e.g. remove further submission stage, make holistic decision - not in relation just to submissions, better integration of PPC. Oppose single plans - will be complicated and confuse distinction between land use and resource management functions. Oppose priority consenting as takes away local input from decision making. Support security for costs and ability to reject vexatious / frivolous submissions. Don't support complaints procedure - adds more cost to the system, focus on supporting and upskilling Councils instead.			Support more use of internet. Support approved contractors for minor works w no need for resource consent.	Changes to the Act should be focused on better outcomes rather than abrupt responses to perceived procedural issues - danger of changes that may have opposite effect than intended. Oppose change to defn environment. Need to determine what shortcomings are due to legislation vs implementation.	

41	Clutha District Council	Council	Conditions for non-notification too restrictive, and the process needs tidying up. Should simplify requirements re content of decisions. Support a new category of consent with minimal or no process requirements...or to broaden the conditions possible on permitted activities. Provide for a producer statement system for evidence at hearings rather than listening to multiple experts on same topic. Env Court hearings should be restricted to matters at issue. Need more sanctions for Env Court to deal with non-compliance w Court directions.	Allow increased use of s55 to avoid costly and pointless 1st Schedule processes. Prohibit appeals against whole plans. Provide more clarity of process required for 10 year plan reviews.		Provide more clarity on interface of RMA and LGA processes.		Heritage values should be relegated to s7, or removed. Clarify relative roles of territorial and regional authorities. Clarify relative role of policies, standards and rules.	Increase 5 year lapsing for designations.
42	Chatham Islands Council	Council			Better interaction between NPS and plan so that don't require costly plan change when NPS produced	Ensure the variances in the Chatham Island Council Act are protected			
43	Whangarei District Council	Council	Affected party status is far too broad. Independent complaints procedure has the risk of adding more time and cost. Should remove RCA class and conflicting role of MoC as submitter and veto power.						
44	Ruapehu District Council	Council	Need to extend statutory timeframes for processing consents. Consultation , especially with Iwi can be difficult if there are no MOU's or similar in place, has unforeseen costs and leads to delays.		Provide guidelines on cumulative effects to give direction to applicants and TS to be conscious of the triggers/tools.				
45	Dunedin City Council	Council	Disagree with late consent = free consent. Support security for costs. Support approved contractors for minor consents - could be facilitated by minor amendment to Form 4 provisions.				Reporting at regional level is too blunt to address specific local issues.	Don't see benefit of EPA and note increased cost to councils. Wonder how councils will fund possible increased monitoring required to PCE. Oppose changed definition of environment.	

46	Rotorua District Council	Council	<p>Only consent applications that should be made away from council are energy generation / distribution, prisons and regional / international airports - otherwise should keep at local level. Support removing Minister of Conservation power of veto. Time penalties for late consents should be a voluntary compliance process. Removing s92 requests would be inefficient for minor consents prepared by amateurs. Environment Court should have power to strike out vexatious / frivolous submissions and appeals. Support security for costs. Increase lodging fee in Env Court. Tighten statutory definition of affected parties. Provide less weight to reverse sensitivity complaints where person had full knowledge of likely effects.</p>	<p>Remove the cross submission process.</p>		<p>Subdivision should be taken out of RMA and put into LGA. HP Trust and DoC are funded by private developers through resource consent process (by imposition of conditions) - should be public funded goods.</p>		<p>Clearly define roles of councils in law and focus regional councils on their core environmental mandate. Don't see benefit of EPA</p>	<p>Support provisions on Maori consultation - but should be mana whenua, not "iwi".</p>
47	Auckland Regional Council	Council	<p>Review ability to appeal planning instruments to Env Court - limit to appeal on legal issues. Fast track consents under large scale urban development plans. Require joint processing of consents that require regional and TA consent. Enable direct referral to Env Court with council's consent. Reduce need for s113 decision reports.</p>	<p>Consider removing controlled activities, clarifying distinction between non-complying and discretionary, s104 - simplified assessment for minor applications with neighbours' consent. Give greater power to accept or refuse private plan changes. Look at option to deal w private plan changes and associated consents at same time. Review designation provisions as are being used beyond scope of public works.</p>	<p>Automatic transfer of NES into consent conditions.</p>	<p>Consider importing LGA approach to charging re admin, monitoring and supervision.</p>			

48	Waitakere City Council	Council	<p>Trade competition - do not allow submissions from anyone who is a trade competitor or is funded by one - all at the council's judgement; or could provide for indemnity costs against trade competitors. Could streamline consents by requiring planner to only report on aspects of assessment they don't agree with. Simplify and clarify the limited notification process. Support security for costs. Reverse presumption for notification - i.e. non-notification unless good reason to notify. Strike out submissions on consent applications that challenge established policy in the plan - individual consents should not re-litigate plan policy.</p>	<p>Allow appeals on plans only on questions of law...or only on plan rules, not objectives and policies.</p>	<p>Standardise some rules that are in all district plans - e.g. height in relation to boundary rules.</p>				
49	New Plymouth District Council	Council			<p>EPA can address complex overlap between RMA and HSNO matters.</p>				
50	Hawkes Bay Regional Council	Council	<p>Don't support having independent complaints authority - could lead to increased costs to meet timeframes. Support ability to reject vexatious and frivolous objections. Reinstate "standing" for submitters so they are either directly affected or interest is greater than the public at large.</p>	<p>Remove the further submission stages and clarification of notification requirements to simplify plan making / changing process. Encourage development of single regional / district plans. Support prohibition of appeals against whole plans. Remove provisions which allow for lodging of private plan changes, undermining council-adopted plans. Improve the plan making process to better respond to market changes/pressures (maybe through use of economic tools).</p>	<p>Direction should be represented by changes to the RMA itself (part 2) rather than through national instruments (NPS/NES) which don't but should identify issues of national significance.</p>			<p>Retain the reference to "people and communities" in the definition of "environment" so not to hinder good decision-making. Support replacing broad ToW principles with specific lwi consultation requirements. Remove "the protection fo the habitat of trout and salmon" from section 7.</p>	

51	Nelson City Council	Council	<p>Better application of s62(2) and 75(2)(a) may be more effective than reducing number of categories. Remove Minister of Conservation veto rights on coastal consents. Enable local community to still have say on major infrastructure projects if given priority consenting. Remove de novo hearings at Env Court.</p>	<p>Enable plan makers to correct policy statements and plans by aligning clause 20A in First schedule to the terms of clause 16 of First schedule. Remove requirement for point-by-point decisions on submissions to policy statement and plan proposals. Provide ability for council to have control of the source of emissions (fuel/appliance) for air quality rather than just discharge.</p>	<p>Support establishing an EPA to separate environmental policy functions from the regulatory function. Provide array of national standards for common matters.</p>			<p>Provide statutory weight to non-RMA documents that have been subject to Special Consultative Procedures. Replace broad TOW references with specific iwi consultation requirements.</p>	
52	Waikato Regional Council	Council	<p>Remove de novo appeals to Env Court on policy and plan development - should be responsibility of political decision makers. Remove appeals on whole plan / policy statement or non-specific appeals to a whole section. Remove RCA category. Support direct referral to Env Court with Council approval - but council can effectively participate in the decision. If use an EPA to make major decisions, affected councils need to have involvement above and beyond that of normal submitter. Revisit legislation presumption of consent notification. Oppose waiving of consent fees - cost passed to ratepayer, delay may be caused by applicant or submitters. Support more flexible timeframes for complex applications. S9(2) should be amended so council can decline an application where Council lacks confidence on commissioned report, or can seek peer review.</p>	<p>Remove requirement for decision on each submission - just have one decision with clear reasons. Restrict extent of further submissions. Remove 10yr plan reviews. Remove Minister of Conservation approval of RCP. Allow simultaneous hearing of private plan change, consents and designations for a single project. RPS should stay separate from plans because they have a broader mandate than guides implementation of other legn and strategies. Danger of RPS being undermined by private plan changes - should give greater weight to proposed RPS, or give discretion to refuse applications to PPC. Almost impossible to measure 'efficiency' of a plan - should drop or qualify this</p>		<p>Require councils to have special regard to the RLTS when considering a requirement, and list RLTS in s74 RMA.</p>		<p>Oppose change to definition of environment.</p>	<p>Need fundamental review of s124A-C. Increase max penalty to \$300,000, and consider higher fines for corporations vs individuals. Amend s314 to allow Env Court to issue enforcement order to change or cancel a consent. Need stronger powers to make people cease activities (eg when abatement notices are ignored) - could allow seizure of equipment for example. Clarify that police can arrest for offences. Allow councils to remove structures with uncertain ownership (eg there is no one to issue abatement order to). Make failure to comply with resource consent an offence. Have power to compel parties to attend an interview regarding alleged offending. Remove need for police officers to be present for search warrants, and to hold exhibits. Remove ability for fines to be underwritten by insurance. Require under s22 that people give full name, DOB and address -</p>

				requirement.					make easier to issue infringement notices etc. Require that a person has to give name and address of a party who may have breached the Act on their behalf. Extend time period for laying information to 12 months. Admin and coastal occupation charges should be set under LGA.
53	Westland District Council	Council		Should not be appeal plan changes if Council processes have been correct.					Delete reference to people and communities in s5 as already in LGA. The RMA should be used by managing environmental effects and the LGA for planning processes.

54	Manawatu District Council	Council	<p>Remove Ministerial veto on coastal consents. Support ability to reject vexatious and frivolous objections. Oppose the removal of the non-complying category. Consider introducing a "simple" category. Oppose the EPA processing consents of major infrastructure projects as process is unclear. Clarify role of local govt once applications are called-in. Require inclusion of local decision-makers on called-in applications. Clarify criteria on Ministers intervention powers, and on deciding between intervention options. Remove Minister of Conservation power of veto on coastal consents. Amend ability for notification challenges to be heard by Env Court. Legislate a presumption for non-notification on controlled/discretionary activities. Reconsider "standing" in order for 3rd party to be involved in a case. Simplify requirements for non-notified decisions. Consider "simple" category. Reconsider appropriate appeal path - remove de novo hearings in Env Court. Clarify council ability to charge monitoring and enforcement fees. Increase enforcement penalties. Introduce producer statement approach for professional evidence in support of applications. Clarify wording in last amendments - s41A-42B, s92.</p>	<p>Encourage single regional/district plans. Remove the further submission stages or at the discretion of council. Improve private plan change process - link to upcoming plan review. Increase flexibility for councils to make changes during the plan process - makes overall decision. Remove appeal right on policy. Prohibit appeals on whole plans. Clarify monitoring requirements to effectiveness of plans, not efficiency. Increase the 5yr lapsing period on designations. Clarify and amend allocation provisions.</p>	<p>Encourage use of other intervention options other than call-ins - govt submissions, govt support for local process. Encourage greater use of s55 with NPS where appropriate. Alter NES provisions - ability to issue certificates of compliance. Improve NES process - cost/benefit analysis.</p>	<p>Improve clarity in LGA, RMA and LTMA interface.</p>		<p>Encourage use of internet in RMA processes. Clarify roles in contaminated land management. Address capacity issue for Iwi involvement</p>	
55	Tauranga City Council	Council	<p>Support priority consenting so long as it includes Notices of Requirement. Ensure any changes to decision making doesn't compromise quality in trying to avoid costs. Maintain current MfE audit rather than reduce/waiver consent fees. Suggest 3 categories - ermitted, controlled and discretionary.</p>	<p>Remove the further submission period for plan changes and reviews. Enable minor amendments (such as those that don't affect property rights) without notification.</p>	<p>Support more NPS and NES that are able to be embedded in plans without needing public submission. Clarify how national measures are to be implemented through the consent process.</p>			<p>Redefine 'environment' including consideration of social impacts and relationship to cumulative effects. Introduce references in the Act to local authority strategic planning documents (possibly under Part 2 and/or s104). Include reference to the urban environment, possibly in Part 2.</p>	
56	Gore District Council	Council		<p>Prevent vexatious appeals - should need standing to appeal (demonstrate env effect on appellants), grounds of appeal must be subject of oral or written submission made at Council hearing, and have security for costs.</p>					

57	Environment Waikato	Council	See Robert Brodnax (same submission)						
58	Northland Regional Council	Council	Limit the scope of 'interested parties'. Restrict govt funding to pressure / lobby groups. Limit judicial review.					Limit DoC role to management of conservation estate.	
59	Invercargill City Council	Council	Exercise an element of quality control if simplifying the process so that applications wont be granted when they could not function in a practicle sense. Clarify the gains to be made by reducing the consent categories from 5 to 3. Provide more education to applicants and allied professionals to enable good applications. Allow for big complex consents to have an initial, free consultation with council officers to make clear from the start what is expected and when for both parties, enabling a project planning approach. Legitimise the ability to decline piecemeal applications which result in creeping incrementalism. Reassess the right of "any person" to submit on applications and plan making - should be actual not perceived effect. Introduce time limit for verbal submissions on applications (similar to LTCCP). Introduce ability for complex applications to be heard directly by a Tribunal (rather than Env Court). Appeal hearings should be de novo. Remove Minister of Conservations power of veto on coastal consents.	Encompass the physical environment and social implications into planning, but not trade competition. Build plans around significant environmental issues of the regions/district, and focus on outcomes for those issues. Introduce ability to prepare and review plan in sections, removing the obligation for the 10yr full-plan review. Encourage plans to be smaller and issue specific where this is better suited to the local interest. Enable plans to direct development. Encourage community input at the Plan development stage.	EPA a good idea but have as a new organisation with functions of ERMA and MFE attached to it, and needs to have opportunity to consider local dimensions. Ensure EPA doesn't add another layer of bureaucracy. Greater use of national guidance, then NPS and NES could replace a large section of Plans, and Plans could be more specific to the region/district. Enable Councils to have ability to opt-out of NPS and NES if the region/district has issues that require a less generic response.	Also consider the Building Act where the preoccupation with procedure and political correctness have questionable benefit to the building industry and consumer.		Move on from preoccupation with procedure and political correctness.	

60	Rodney District Council	Council	<p>EPA should also be able to call in notices of requirement. Support security for costs - but keep MfE ELA under review to ensure legitimate users aren't cut out. Limit plan appeals to Env Court - council should be making final decisions. Prohibit appeals against whole plans. S274 parties to appeals should drop away when the principal appeal is withdrawn. Establish an advisory body to help people with participation in the RMA - as an alternative to ELA.</p>	<p>Remove opp for further submissions, or limit to persons who have land w zoning affected by an original submission. Increase flexibility of Councils to change proposed plan in response to submissions (e.g. able to make all the consequential changes required). Allows overall decision with reasons rather than decision on each submission. Enable incorporation of external documents by reference - plan change process too slow to keep up with technical standards. Create another Schedule setting out standard definitions for common matters - eg non controversial default rules for fences, noise measurement etc. Private Plan Changes can divert strategic planning focus of council - should be more grounds for refused PPC request or a 2 yr moratorium leading up to District Plan review. RPS are becoming too broad in scope - should not be basis for involvement by RC in individual consents.</p>				<p>Support removing Min Cons veto. Oppose change to defn environment.</p>	<p>Review scope s32 - should be simpler list of advantages and disadvantages, too onerous at the moment and adds little value.</p>
61	Porter Group Ltd	Individual	<p>[consultant offering his services and experience to participate in any task force established for the review]</p>						

62	Saunders Unsworth	Individual					Amend RMA so coastal occupancy permits (enabling ships to operate) for port companies are indefinite as long as the port remains.		
63	Urbisphere Ltd	Individual		Far too much use of discretionary activities so councils can manage risk - but creates overly complicated process for no environmental gain.					
64	New Zealand Pork	Individual [no-NZ Pork]		Amendment to remove uncertainty on what is / isn't an operative rule. Reduce notification requirements for farming activities.	Develop an NPS on sustainable agriculture.		Auditor general audits council performance under RMA.		
65	Property Council New Zealand	Individual - no CE of Property Council of NZ	If becoming party to proceedings must give notice within 15 days of appeal being lodged. Require parties to provide security for costs. Notification should only go to persons "significantly adversely affected". Should be tighter rules for defining trade competition objection.			LGA development contribution rights decisions should be appealable to the Environment Court.	Royal Commission on Auckland governance should look at rest of NZ re a more unified regional / district system.	Should only be able to appeal when the applicant owns the land in question. Min Conservation should decide whether to endorse or oppose an application prior to consideration of appeals. Support EPA - which should develop NPS	

66	Contact Energy Ltd	Individual [no – as CE of contact NRG]	<p>Supports priority consenting for large projects – though notes that current call-in process has worked well. If retain call-in then criteria should be expanded to include importance of proposal for NZ's economic development. If adopt a 9month timeframe for priority consents it should run from notification to hearing commencement (not to decision)- need time to deal with the big decisions. Remove the non-complying consent category. Should be security for costs against vexatious submitters. Direct referral to Environment Court should be at applicant's choice - not just relying on Minister's discretion. Current 5 year lapse provisions are impractical for big expensive projects. First in first served consent processing undercuts big projects. Extend designation powers to facilitate large projects - plus closer link between RMA and Public Works Act. Called in consents should not need to be re-notified by the Minister. S92 requests should be clarified for pre-notification (info re understanding the application and its effects) and post-notification (info for Council to prepare s42A report).</p>	<p>Supports combined plan approach such as Manawatu-Wanganui, also would support integrating RPS in Regional Plans. NPS and NES on same subject matter should be developed in tandem not independently. Clarify the status of NPS vs NES, and for when two NPS may come into conflict.</p>				<p>Supports creation of EPA to manage NPS, NES and major priority consents, and focus MFE on policy issues. Current definition of "environment" is ok, important to include socio/economic benefits. Remove veto of Minister of Conservation in coastal consenting.</p>	
67		Individual	<p>Remove RCA class. Have a permanent standing panel to hear call-ins.</p>	<p>Remove right to make further submissions on plans and policy statements. Remove necessity to make summary of submissions. Remove AMA aquaculture provisions - go back to issuing resource consents. Remove Minister of Conservation approval of coastal plans.</p>					
68	LECG Asia Pacific	Individual [no - managing director LECG]		<p>Reduce the number of activity categories.</p>	<p>NES for water quality, effects of aquaculture - and redevelop NZCPS.</p>				
69		Individual	<p>Reinstate security for costs. Could require trade competitor submitters have to prove the environmental effects on them. Standing - require non-submitters wishing to join the process to demonstrate effects on them.</p>						

70		Individual [no – as CE of IPENZ]	Nationally important infrastructure projects should trigger call in / priority consent provisions - should go direct to Board or E Court, provide EC with additional powers of inquiry, dispense with approval under multiple Acts and sections of the RMA and enable approvals in principal. Designations need far longer than 5 year lapse period. Extend to 30 days the processing time for non-notified consents.	Should be an NPS for all major categories of infrastructure - with required NES developed in tandem (e.g. common environmental standards for NZ highway network).		Consolidate legn relating to infrastructure developments so only have one approval and appeal process (e.g HPAct, Reserves Act, LGAct, PWAct).	Need mechanisms for infrastructure providers to recover costs of direct cumulative effects on infrastructure performance (e.g. effects of land development on performance of state highway)	Keep broader defn of environment as it is relevant to benefits of infrastructure.	
71	Te Arawa Lakes Trust	Individual	[Wishes to be engaged concerning Maori engagement requirements of the RMA reform including participation on RMA review working group]						
72	Te Arawa Lakes Trust	Individual	See Toby Curtis (same submission)						
73		Individual	Only persons adversely affected by a proposed activity should be able to make a submission the consent application						
74		Individual							The development and implementation stages of the reivev will have significant impacts on Maori and Iwi need to be included on any working party (Her cv is attached).
75	Aquaculture NZ	Individual [no – as CE of Aquaculture NZ]	Reduce repeated vexatious appeals - want single process for decision with one right of appeal. Remove Min of Conservation veto right.		Govt needs to give more direction to guide RMA implementation at regional level. especially in coastal planning -esp through the EPA, national standards and 'default' settings for certain coastal management issues that can then be modified at regional level if necessary.			Resource allocation should be moved outside the RMA - which should just deal with environment effects. Implementation of the RMA is just as important as the law - incentives for councils to efficiently implement the legislation, inconsistent approaches by different councils etc - need better interorganisational coordination. Supports EPA and believe should be fundamental part of new aquaculture regime.	

76	Mighty River Power Ltd	Individual	Enable councils to grant consents for longer than 35 years, on a discretionary basis, for infrastructure projects of national significance					include in s6 the provision of essential infrastructure as a matter of national significance.	Need to improve management and allocation of scarce resources where there are competing applications.
77		Individual - no - Business Roundtable]	This submission has track changes to different parts of the RMA rather than suggesting policy changes - so have not recorded these here.					Establish an RMA review committee to approve all RMA planning documents. Also would consider all appeals against plans.	
78	Vodafone	Individual - no Vodafone	Waive consent fees in decision not made in statutory limits (eg. as in Hamilton).		Make crown property available for comms installations. Expand NES to enable automatic consent for standard low-impact sites. And develop NES on standard design models to standardise treatment by councils. Enable taller cell towers.	Amend Telecommunications Act to provide level playing field with fixed line industry.			
79	Vodafone	Individual - Vodafone	Require councils to consistently deliver decions on consent applications within the timeframes. Waive consent fees if decision not made in statutory timeframes.		Mandate a similar nation-wide policy approach to boost all manner of infrastructure projects to reduce the widely inconsistent treatment of similar applications by different councils. Make crown property available for comms installations. Expand NES to enable automatic consent for standard low-impact sites. Enable taller cell towers.	Amend Telecommunications Act to provide level playing field with fixed line industry, as well as other utility industries.			
80		Individual						Need to rebalance the importance of land use to make a living and land with ecological value. Need to look at existing use rights, purpose fo the Act, land use activity, compliance process, veg clearance and earth movement.	

81	Ryman Healthcare Ltd.	Individual [no – as CE of Ryman Healthcare]	Want aged care facilities to have fast track consent status because of social importance. Councils should only have 1 opportunity to request further info and face financial penalties if don't meet deadlines. Major projects should goto impartial hearing panels, and there should be awards of costs vs failed objectors.			<p>Should scrap development contributions under LTCP as they are unfairly implemented -revert to RMA financial contributions based on impacts on local infrastructure.</p> <p>Consider exemptions or concessions re some infrastructure projects due to their value to society.</p> <p>The Building Act has a large an impact - should be immediate acceptance of docs, only one RFI and penalties for late processing.</p> <p>Proposes that a wider range of engineers be able to approve documentation.</p> <p>Should be possible to get standard plan approved to avoid continual reapplication for same design.</p> <p>Building inspection should be done by qualified engineer, not by waiting for council.</p>			
82		Individual						<p>Ensure that councils properly separate their monitoring / enforcement provisions from planning so councils are liable like everyone else for breaches of the Act.</p>	
83	Lewis & Barrow Ltd.	Individual		<p>Set a maximum number of zones in a plan. Have a word limit for plans. Restrict the number of activities</p>	<p>Govt set model templates for plans.</p>				

				that can be controlled in plans					
84	Environmental Law Committee of the Law Society	Law firm	Reintroduce the need for submitters to establish status to submit. Better enable councils to rule out frivolous submissions. Allow councils to reject flawed applications to avoid delays due to requests for further information on consents and plan changes. Reduce the time at Env Court for s274 parties to file notices from 30 to 15 days to reduce delays. Remove Min of Consv involvement in restricted coastal activities and ability to nominate a member of the hearing panel. Remove restricted coastal activity category. Don't remove right of further submission on policy statements, but could limit to only those whos property rights could be affected.	Limit appeals to Env Court on planning instruments to points of law rather than policy issues.		Better integration between RMA, LTMA, Building Act and LGA.	Support the introduction of eelectronic filing and service of documents at the Court.		
85	Chapman Tripp	Law firm	Restrict requests for further information to only determine the notification track and ensure, for notification purposes, accurate understanding of the activities for the application. Introduce measures to ensure greater accountability and fair redress for inadequate council performance in meeting processing timeframes. Consider ability for council to dispense with unnecessary hearings for minor consents, with quality assurance protections (not all categories...). Introduce alongside priority consenting a quality assured hearing track for major plan and consent application processes. Restore Courts powers to make orders for security for costs. Require use of electronic means for service and lodgement of proceedings and evidence. Increase appeal lodgement fees. Remove upper cap on the number of Env Judges. Caution against reinstating standing for appeals. Don't remove 'controlled activity' category as provides investment certainty.	Encourage and provide direction for combined interdistrict and single regional plans. Risk in removing the further submission phase of plan preparation, could just limit scope of them instead.	NES need to be cross-reference in Parts 3, 4, 5, 6, 8, 9 and 12 - insert "or regulations" in necesasry subsections. Insert additional references to regulations/NES into sections listed in Annex 1 of the submission. NES and plans, consents and designations need to be better interrelated. Provide objectives and policies (possibly via NPS) to guide and direct the application of NES. Allow NES to directly change the content of regional and district plans where appropriate. Clarify that local authorities are responsible for administration and enforcement of NES. Expand 'call-in' to a single commissioner call on track in cases where the 'national significance' project involves clusters of minor applications across 1 or more districts (submission gives implementation suggestions). Provide clarity to intended call-in targets.		Consider adapting the Court, for the purpose of call-in, as a first instance resource management authority for direct referral purposes. Consider having a pool of Board of Inquiry commissioners for call-ins to provide coherant decision-making across matters of national significance.	Caution against changing 'environment' definition.	

86	Bell Gully	Law firm	<p>Strengthen information requirements for initial applications including the requirement to consult local authorities prior to applying and impose costs on late applications. Increase the cost of lodging an appeal with the Environment Court. Include provision allowing consent applications to go straight to Environment Court hearing or Board of Inquiry when trade competitors are opposing consent applications. Clarify definition of 'major infrastructure' to include nationally and regionally significant projects. Review section 274 to consider the basis for appeal by submitters and scope of notices for interested parties.</p>	<p>Simplify district and regional planning documents to provide greater certainty to potential applicants and public. Restrict vexatious and frivolous objections by implementing financial disincentives i.e. give Environment Court greater powers to award security for costs</p>	<p>Encourage greater use of call-in provisions and priority consenting. Expand Ministerial intervention powers to cover matters of regional importance, as well as national importance.</p>				
87	University of Waikato	Law firm	<p>Applicant should have appeal rights for when application not processed in time. Consider awarding of costs vs council.</p>	<p>To stop continued relitigation of Pt 2 at all stages, assume that a proposed or operative plan achieve the purpose of sustainable management unless challenged by submissions. Assume all activities provided for in plan rules provide for sust management except for non-complying and some discretionary activities. Introduce a statutory timeframe for plan making - eg timeframes between summary of submissions and start of hearing. Issue an NES on good practice plan making - reduce the complex number of objectives and policies, and on generic rules all councils could adopt eg noise rules. Introduce a duty to issue monitoring statements. Give commissioners power to make decisions on submissions - use commissioners for all</p>	<p>Use an NES to set out what activities should be permitted and controlled.</p>	<p>Require that RMA designations and PWA compensation matters are progressed in tandem.</p>		<p>Don't change defn of environment - would create confusion and years of case law to define again. Review s176 to see if time can be saved by leaving detail of designations until later. Provide time periods for designations similar to consent processing. Move designation process to regional councils.</p>	

				plan hearings, from national pool or appointed by MfE or EPA.					
88	Vector Ltd	Business/industry	Consideration of a Sunset Provision whereby if an application is appeals from Council Hearing process to Env. Court, an undertaking as to the timeframe should be imposed. Better enforcement of timeframes. Reassessment of the balance between public participation and appeal rights vs. efficiency, effectiveness and responsiveness		Develop NES for electricity distribution, gas transmission and gas distribution				
89	NZ Institute of Forestry	Business/industry			More national guidance through NPS and NES - would like forestry activities to be predominantly permitted activities in plans				

90	Crest Energy	Business/industry	<p>Applicant can choose to go straight to Env Court. Councils can apply once only to Env Court for time extensions. If timeframes exceeded consent is granted automatically w conditions set by independent Commissioner. S92 requests don't "stop the clock". Councils more discretion to accept or decline applications and have 10 days to decide. Commissioners cannot adjourn hearings for more than 72 hours. Oppose de novo hearings. Pre-hearing stage at Env Court to determine if appeal has merit. Allow consents that partially approve activity in principle - with requirements for later information and further decisions. Objectors should be liable for opportunity costs if "gaming the system".</p>						
91	Horticulture New Zealand	Business/industry	<p>Direct referral to Env Court. Require 15 working days for responses to officer reports and for advice of hearing dates. Provide security of costs in Env Court - unsuccessful parties should be liable for full costs of successful party. Financial penalties against vexatious or frivolous submitters. Consents should be for 35 years unless Council can justify otherwise.</p>	<p>Require pre-notification consultation with affected parties when drafting plans - helps resolve issues b4 the hearings stage - including establishing an independent science panel to establish body of evidence. Remove cross submission process.</p>	<p>Hearing process compulsory for consultation on NES. Release draft NES for consultation and do full cost benefit analysis. Remove advocacy role of DoC.</p>	<p>Clarify policy for costs recovery - esp reln s36 RMA and s150 LGA.</p>		<p>Establish an RMA ombudsman to monitor council performance.</p>	<p>Define the split between cost recovery re public vs private benefit.</p>
92	Telecom	Business/industry	<p>Priority consenting should also involve large rollouts that comprise hundreds of small projects. Independent complaints mechanisms to deal with consent processing complaints. Modify RMA provisions that are used unfairly to stop the clock on applications. Amend s88 so once 5 working day period to reject application has passed the processing time starts. Restore security for costs. More guidance and clearer provisions re costs, fees and general bad behaviour. Should aim for one comprehensive hearing and focused appeals, rather than 2 whole processes.</p>	<p>Overhaul ss23 and 32 to avoid unnecessary interventions and inefficient policy. Use more combined and inter-district plans. Standard format for plans and online database. Specify time limits for hearings on proposed plan change. Amend ss6 and 7 so that natural character etc needs to be listed in plans to provide clarity.</p>	<p>Use NES and NPS to encourage national standard approach to rollout of infrastructure. NES need some change to link better with parts 3,5 and 6 of the RMA.</p>		<p>Create a team to do s32 audits.</p>		

93	Federated Farmers of NZ	Business/industry	Streamline consent process so can sign off consent using single page form and single visit. Restrict appeals to those submitters directly affected or representing legitimate public interest. Don't support independent complaints mechanism.	Mandatory consultation with landowners that will be affected by proposed RPS or plan. Councils should assign no higher level of control over activities than is necessary to achieve objectives and policies in plan - and not every land use activity need to specified in plan.	Only one all-of-govt submission on consents, and take a "net conservation benefit" approach - rather than individual impacts of proposals.	Remove DoC advocacy role and have DoC focus on education, information.	Central govt give more support to councils - esp smaller rural councils. Independent body should audit govt processes.	Oppose changes to defn environment.	Compensate landowners if restricting landuse for national interest - set up a compensation fund and amend s6 to recognise property rights of landowners. Include statutory definitions of "environmental compensation" and "conservation". Ensure that protection of amenity values doesn't stifle ability of farms to change.
94	NZ Minerals Industry Association	Business/industry	National interest consents should go straight to Env Court. Should have 'standing' to lodge appeal. Should disestablish ELA fund. Limit defn of 'effects' to normal meaning of word. Allow cross-examination at council hearings. Require security for costs. Penalties on councils for not complying with timeframes. All consents and plan changes should be heard by Commissioners. Allow security for costs in the E Court. Focus on statutory time periods rather than on rules about standing.	Councils should prepare aggregate strategies. Reduce plans to rules - reduce methods, objectives etc.			Council officers and peer reviewers need to have better technical expertise. Need capacity building in councils. Need quicker timeframes for appeals	Reduce overlap of functions between regional and territorial bodies - eg natural hazards. Transferring functions from MfE to EPA may not lead to efficiency gains - creating another stream of advice and competing for same staff as MfE and PCE. Better to transfer some regional council functions to EPA. EPA could assess what MfE good practice guides should be enshrined as NES.	
95	Malone Solutions Law Office	Business/industry	WCOs should be dealt with as part of consent process, not separately - and should not have status beyond Pt 2 of RMA Only ask for further information when reasonable grounds that it is required re adverse effects - onus of proof. Support security for costs and also costs against submitter on consent applications (if it lacks merit).	Enable plan rules that would enable resource use through consent that would otherwise to subject to restrictions under WCO - and that need to consider actual values the WCO intending to protect.					
96	Silver Fern Farms Ltd	Business/industry	Mandatory for council to release draft conditions on consent - applicant and submitters can discuss before finalising decision-reducing chance of appeal.						

97	Meridian Energy Ltd	Business/industry	Remove RCA class. Amend the factors enabling call in of consents - e.g. threshold scale. If councils miss statutory timeframes should be a consideration when fixing administrative charges. Support security for costs.		Encourage and direct combined and single plans.			Move climate change and renewable energy matters from s7 into s6.	Add new category of network operator to s166 so electricity suppliers can apply for requiring authority status. Oppose changing defn environment.
98	NZ Kiwifruit Growers Incorporated	Business/industry	Clarify what costs are or are not recoverable from consent holders. Retain priority access for existing users. Oppose any changes to s124 and supports retention of the new s124a-c in their current form. Address variation in duration of consent for similar activities across regional boundaries.	Require consultation with communities of interest before councils prepare and notify plan changes, and include a non-adversarial expert science panel to establish body of evidence.	Include a hearing process as part of the consultation for a proposed NES, have draft NES with discussion document sent out for public consultation. Remove statutory positions of DOC.			Establish a process to conduct statutory due diligence on council RMA performance - cost of judicial review too high.	
99	Landco Limited	Business/industry	Reverse the presumption in s9 to place greater onus on local authorities to provide effects based justification for the requirement to obtain a land based consent. Amend s32 to require an evaluation examining whether a rule requiring a consent is necessary in achieving the purpose of the Act. Restrict requests for further information to only assess whether a proposal will have a significant adverse environmental effect, and limit to 10 working days. Strengthen ability for Court to discourage frivolous or trade competition appeals.					Oppose changing definition of 'environment' to only natural and physical. Support removal 'amenity values' from environment definition - could replace with 'individual quality of life'.	
100	NZ Winegrowers	Business/industry		Implement requirement for Councils to consult with communities of interest before preparing and notifying plan changes. Greater use of national standards and uniformity across councils	Establish an NES which recognises agricultural and horticultural industries. Analysis of the costs and benefits of NESs should be notified to all stakeholders during the consultation process				
101	Wellington Water Management Ltd	Business/industry	Refine notification provisions to reduce it being used as a 'too hard basket'. Guide councils on how to decide who is "affected". Incorporate into the Act existing caselaw on adjournments so councils can't use adjournments to avoid s115(a) timeframes.		Withdraw proposed freshwater NPS as it does not take account of the interconnected nature of water resources.			Change defn of environment. Redefine "effect" in s3.	

102	Transpower New Zealand Ltd	Business/industry	<p>Change 2-tier decision making to single, quality, hearing on the merits - with enhanced pre-hearing procedure and dispute resolution. Require Board of Inquiry to consider why a matter is called in when deciding merits of case. Promote resolution of issues before formal hearings. Clarify and limit what issues may be considered in the hearing. Allow submitters to comment on draft conditions. Limit public comment and set time limits re draft BOI decision. Allow evidence to be lodged electronically and signed / sworn later. BOI can follow Env Court guidelines re evidence and process. Enable electronic service of documents to submitters. Enable BOI or Env Court to waive outline plan requirements.</p>		<p>Streamline call-in process re assessment criteria and improve the serving of documents. Priority consent process should also quickly process minor associated consents. Allow applicant to seek certificate of compliance for activity permitted by an NES. Clarify relationship between NES and plans. Clarify relationship between designations and NES. Clarify relationship between NES and Part3 activities. Enable certificate of compliance to be sought for activities permitted by NES. NES- resolve issues with permitted activities and significant adverse effects s43A(3) and existing use rights and S43B(9) and 20A(2). NPS should not take precedence over existing designations,</p>	<p>Require Councils and infrastructure providers to coordinate infrastructure planning - complemented by reducing the # of plans and central e-databases of plans. Waive landowner approval under HPAAct.</p>		<p>Enable designation of works in advance of commissioning dates - allowing establishment of transmission corridors - and provide for "envelope" of effects. Insert security of electricity transmission for supply to s6.</p>	
103	Irrigation NZ	Business/industry	<p>Review the current consent conditions that restrict flexibility for land use change to meet market circumstances (e.g. requirement for full consent process regardless of significance of change). Develop consent conditions that encourage each water user to only take from the resource in each year what is a reasonable amount to meet demands. Encourage more discussion with affected parties off line before statutory process commences. Enable consent hearing to give early interim indication to developers subject to conditions - applicant can then continue or withdraw. Support priority consenting of major projects. Restrict trade competition and frivolous objections.</p>	<p>Plans need to have flexibility so that required changes can be addressed without variation process.</p>	<p>Require national and regional economic analyses for all major interventions at the national level.</p>		<p>Encourage audited community self-management in dealing with issues where a large measure of community consensus can be demonstrated and discourage NIMBY and vexatious minority interference.</p>		
104	David Collins Consulting Ltd	Consultancy	<p>Allow limited notification in cases where applications only affect immediate neighbours. Clarify section 93 regarding limited notification so as to remedy its misinterpretation due to section 104(3)(d)</p>						

105	Duffill Watts Ltd	Consultancy	Allow courts to have final jurisdiction; & to award damages & costs. Allow groups to pre-register their interest. Require consultation of all interest groups, including Maori. Address quality of applications		Retain DOC's role as advocate for the Environment		Provide legal aid/monetary support for groups to apply for by declaring case merits and financial standing. Better education regarding subdivisions and impacts.	Clarify definitions including sustainable, development, vexatious and standing. Place heritage issues under RMA & provide funding to provide/protect/preserve built heritage.	Keep policy and regulatory aspects of councils separate.
106	Planit Associates	Consultancy	Include independent Commissioner on panel for resource consent hearings. Enable limited notification even when effects are potentially more than minor (s93/94). Consider allowing decisions at Council hearing and Env. Court level to be made on basis of evidence alone (as is the case in UK).	Enable wider range of minor amendments to be made without going through plan change/variation procedures. Limit or remove the further submission process. Simplify s32 requirements for small plan changes. Impose statutory timeframe for Councils issuing decisions on private plan changes, particularly for minor changes and/or few submissions	Give proposed NPSs the same weight as Proposed District plans to allow greater use of provision. Have prescriptive NPS for Councils and Courts to follow with regards to vexatious & frivolous objections and trade competition objections. Better use of Ministerial powers to intervene.			Retain reference to social and economic within defn of 'environment'. Elevate 'use and development of renewable energy' to Section 6. Require inclusion of potential conditions in s42a reports. Retain current s77B. Incorporate s104D requirement for non-complying activities into s104 assessment;	
107	Boffa Miskell	Consultancy						Clarify definitions i.e landscape, outstanding natural character, coastal environment. Review sections 6(a) and 6(b) to include all landscapes (natural, cultural, urban, rural, coastal etc) with an emphasis on landscape character and management. Review and clarify Sections 7(c) and 7(f) to ensure landscape considerations are more clearly identified and classified logically.	
108	Environmental Defence Society Inc	Consultancy	Reduce types of resource consents. Use current call-in procedures	Standardise district plans and produce standard rules. Introduce mandatory regional spatial plan in regional policy statements with four broad areas: urban,				Retain definition of standing. Retain security for costs. Retain Part II as it is (apart from s8). Retain notification obligations	

				rural, countryside living & landscape protection;					
109	Harry Bhana & Associates Ltd	Consultancy	Improve quality of application for consent process including ability to decline applications that do not provide necessary information. Councils must accept applications if in accordance with requirements. Make non-complying activity tests more stringent & require all consent authorities to review these. Delete 'assessment criteria' for discretionary activities in all plans. Remove trade competition involvement in RMA processes	Require that district plans provide for variations to neighbour protection rules i.e. automatic issue of resource consent when neighbours agree & a low resource process where they don't agree. Remove non-essential items from planning process. Make more activities/developments permitted rather than discretionary (but subject to specific standards and terms)			Prohibit general tree protection		
110	NZ Planning Institute	Consultancy	Impose requirements for more consistent analysis of impacts of development proposals i.e. quantitative perspective. Review process of Env. Court & judiciary to achieve a more participatory process	Reprioritise planning system with central government policies and regional policy statements having higher priority over district plan rules. Adopt adequate processes & guidance for plan development	Implement NPSs, financial support and technical guidance to improve plan quality, development process & monitoring of plan outcomes. Adopt national standards to streamline consenting process. Diversify funding delivery mechanisms. Implement EPA which ensures plan quality, including evaluation of s32 analyses. Central gov. have role in approving local/regional plans to ensure they give effect to NPSs & NESs				

111	Duffill Watts Ltd	Consultancy	<p>Provide time limit on councils being able to make s92 request prior to a decision of notification/non-notification and allow additional s92 process to occur if application is notified & submissions received. Enable applicants to request that their application go on hold & allow a time limit. Introduce fee remissions for applications not processed within statutory timeframe. Introduce statutory timeframes for issuing Section 223 & 224 Certificates. Introduce greater ability to delegate decision making to professional RMA statutory planners. Retain present system of Environment Court mediation to resolve appeals. Retain controlled, restricted discretionary, discretionary, non-complying and prohibited activity status of activities. Retain existing call-in provisions for major projects of national interest only</p>	<p>Require mandatory auditing of proposed district/regional plans prior to public notification. Use of model district & regional plans as part of rule formation and auditing process. Confirm and clarify that a Certificate of Compliance will endure even if a Regional Plan changes in future</p>		<p>Strengthen linkages between Civil Aviation Authority Jurisdiction and RMA</p>			
112	SmarthGrowth	Consultancy		<p>Better account for integrated planning and provide greater emphasis on strategic integration of land use and infrastructure planning and provision. Better integration of planning approaches, decision making and planning considerations</p>		<p>Strengthen and provide for inter-statutory linkages particularly between the RMA 1991 and the LGA 2002 and LTMA 2003. Require local authority decision-making bodies and the Environment Court to give more (significant) weight to non-RMA 1991 documents, strategies and plans, in both the development and assessment of any policy statement or plan changes, or resource consent applications. Give greater recognition to the urban environment in the RMA 1991</p>		<p>Provide for longer-term designations (or similar mechanism) for the protection of key and long-term transport routes and infrastructure corridor. Provide a more obvious role in long-term strategic land use and infrastructure planning for regional policy statements. Address definition of 'environment' to give greater emphasis to social and economic well-being. Address definition of 'effect'</p>	

113	Kevin Rolfe & Associates Ltd	Consultancy	Greater use of experienced, independent commissioners for RMA hearings by regional councils, esp. for technically complex hearings. Limit appeals to Env. Court for matters of law		Establish an EPA to address international and nationally significant matters and provide support for regional councils				
114		Public	Remove non-complying activity class		Introduce provision for a National Planning Framework which is updated every five years with all future developments included. Set up central agency through which environmental effects are assessed			Clarify what are matters of national importance. Abolish the provision of the veto by the Minister of Conservation in s119	
115		Public	Provide more clarity around non-complying activities including the decision process. Better consultation is needed to ensure that all stakeholders have their say, including community groups. Applications that are dishonest and/or incomplete should be rejected and not considered for at least two years.						
116		Public	Modify Schedule 4 to provide better guidance for consent process, and in order for consultation to be a requirement for at least all non-complying activities prior to an application being formally received by a consenting authority. Allow consent authorities ability to reject poor applications.		Improve utilisation and communication surrounding National Environmental Standards		Provide more funding towards training for communities, applicants and professionals involved in resource management to improve understanding	Abolish section 92A of Act	
117		Public	Allow consenting authorities a lower threshold for rejecting an application due to lack of information. Allow consents officers discretion to approve consent applications for non-notified and limited notification consents				Include provision for continuous improvement, including introduction of new technologies		
118		Public	Retain community's ability to be involved in consent process and provide more support for this	Remove ability or set higher threshold for developers to seek private plan changes	Develop stronger environmental protection policies. Develop Coastal Policy Statement which clearly defines areas not open for development. Clearer definition of area use in regional policy statements				
119		Public	Limit/restrict those who can be involved in appeals process. Allow direct referral of large project applications to Env. Court on applicant's request	Greater consistency between plans i.e. standard rules for subdivisions, recession plans, proximity to boundaries	Establishment of EPA to start with discussion paper & not be rushed.			Act should acknowledge changing urban landscapes and allow this to be an outcome in planning applications. Establish register of project types which defines which projects are nationally	

								significant.	
120	The Dry Weka	Public	Remove limited notification option and introduce non-notification or partial/full notification at the consent authority's discretion; alternatively, implement rules for when resource consents require full notification or non-notification. Abandon status of a controlled activity. Clarify that a local authority does not have to process submissions which are not in the format of Form 5 OR are not included in the Summary of Submissions.	Improve planning applications process. Set up independent authority to audit the quality and timeliness of plans. Require legal review of plan rules. Review rules regarding further submissions including who can make submissions. Restrict section 32 report to be restricted to an initial evaluation of options by local authority at time of decision to undertake plan review or plan change.	Address requirement for all information held by a local authority to be available under the Local Government Official Information and Meetings Act 1987		Set minimum standards for persons to practice as RMA consultants.		
121		Public		Introduce stronger regional spatial planning in regional policy statements	Identify and protect areas with regional significance by government policy				
122		Public		Introduce stronger regional spatial planning in regional policy statements. Abolish ability to apply for private plan change or set a higher threshold	Identify and protect areas of National Significance under government act				
123		Public		Introduce stronger regional spatial planning in regional policy statements	Identify and protect areas of National Significance under government act, such as coastline and ecologically sensitive areas				
124	Resource Management Law Association of NZ Inc.	Associations	Bring back security for costs. Could require trade competitor submitters have to prove the environmental effects on them. Standing - require non-submitters wishing to join the process to demonstrate effects on them.	Environment Court shouldn't hear plan hearings de novo - should be council's role to finish plans. Remove the ability to make further submissions on plans.	Need more NES re definitions, coastal erosion, sediment control, earthworks, building in flood plain, soil, noise control.		Difficult to see why Minister Conservation should approve coastal plans and RCAs.		

125	NZ Forest Owners' Association	Associations	Remove E Court bundling directive. Distinguish interested and affected parties and have penalties for frivolous / vexatious objections. Provide for direct referral to E Court.		Develop NES for plantation forestry. Govt develop national data frameworks on biodiversity, rivers, pests and weeds. Centralised online database for all NZ plans and maps.			Limit or remove DoC's advocacy role. Need far fewer TLAs.	
126	NZ Wind Energy Association	Associations	Support priority consenting through an EPA, want to work with EPA to develop wind energy guidelines - as an NES or NPS etc. Councils should be able to move away from first in first served consent priority to address competing uses and reverse sensitivity. Applicants have right to seek hearing from independent commissioners. Only directly affected parties can appeal to E Court. Have security for costs re EC appellants.	I.d of outstanding natural features or landscapes should be done in plans. not ad hoc in consent hearings - could amend s6(b). Adopt established industry standards in NES (e.g. for sound turbine design). Reduce the number of planning instruments.	Councils must have "particular regard" to all-of-govt submissions.	Some authorities are after info better left to Electricity Act - should be clear lines around what is required under RMA.		Supports narrower defn of environment as councils shouldn't be considering alternative sites financial profitability, efficiency etc - though should not lose sight of broader economic benefits of a proposal. Amend s104(3) to preclude consideration of alt renewable options re efficiency or financial viability. When considering 'future environment' councils should be able to consider wind farms - can't at the moment coz not permitted activities.	
127	NZ Historic Places Trust	Associations	Introduce a priority consenting regime which is subject to robust environmental impact assessment procedures and public consultative measures. Retain existing consent processing system. Shorten consent processing times over Christmas-New Year period. Add NZHPT as an affected party under section 94B. Retain permitted, restricted discretionary, discretionary, non-complying and prohibited consent categories. Remove controlled activity status to simplify local authority plans	Greater adoption of combined district plans. Confirm consultation status of NZHPT when local authorities are preparing policy statements and plans	Establish an EPA and preparation of national guidance. Develop urban design legislation to improve the sustainable management of large urban communities. Improve national guidance to achieve national consistency of heritage processes and outcomes in the form of an NPS and NES for historical issues. Ensure notification processes include references to proposals for registration under Historic Places Act 1993			Retain the current definition of 'environment'. Retain section 8 and other Maori-related provisions to ensure adequate recognition of the Treaty of Waitangi. Clarify the meaning of 'Historic Places Register'	Clarify the affected party status of the NZHPT under section 94B

128	Transpower New Zealand Ltd	Business/industry			Streamline call-in process re assessment criteria and improve the serving of documents. Enable opportunity to designate work in advance of commissioning dates, allowing the establishment of transmission corridors. Fix workability problems with NES provisions e.g. allow applicant to seek certification of compliance for an activity permitted by NES.	Engage transpower when considering wider changes that may have implications for the Electricity Act and LGA.			
129		Individual			Need for Govt leadership - state expectations and provide support for achieving them.	Inconsistent application of RMA and Building Act by TA's - increasing delays, reporting and costs that can render projects uneconomical..			
130	Minister of Maori Affairs	Govt						Cautious of replacing principles of TOW with specific iwi consultation requirements without full and meaningful consultation with Maori - would need to develop explicit guidance (leave for Phase2).	
131	Cotton and Light Ltd	Business/industry	Process and information requests from council for small-scale and 'simple' consent applications are out of proportion to the likely effects caused by the activities - have assessment scale appropriate to the project scale. Make council more accountable for exceeding timeframes - removal of unnecessary complications planners insert into the process. Need to scrutinise council fees for applications.		Consider having similar process at Env Court to disputes tribunal where lawyers are not allowed to participate for simple RMA issues. Encourage councils to use the plan provision for subdivisions to be a permitted activity and not require a consent if the subdivision meets the requirements of the district plan.				No incentive for councils to simplify the process when an entire industry has developed around the RMA.
132	Civil Resource Consultants	Consultancy							Reform of the vested interest in assessing projects needs consideration in favour of monies spent in delivery. Devise infrastructure projects that build state capacity, meet sustainability objectives and enhance urban life.

133		Individual		<p>Build on the limited notification to cut out the wider parties from the process, and to remove the need for a hearing - application, submissions and s42A report should suffice.</p> <p>Consider having applications with minor effects in a confined area to not be publicly notified. Consider direct referral to Env Court or EPA for complex applications.</p> <p>Could be mandatory to have experienced commissioner on the panel making decisions on notified consents. Consider simplified process for simple consents.</p>				
134	Local Government NZ	Council		[offers assistance in drafting of amendments from an implementation perspective]				
135	North Canterbury Councillor	Individual		<p>Modify provisions that allow applications (e.g. conservation order) where there are comparable processes already under way to address the same issue for which the applicants can (and likely have) be a party to.</p>	<p>More clearly define whose mandate specific matters fall under, thus allow one agency to deal with it through one process, not have regional councils appeal city councils etc. Need to address the way national standards are implemented in areas that have already developed Plans to address the same issue, so not lose the faith of the community by changing what they have already agreed with the local decision-makers.</p>		<p>clearly define a mandate for participants spending public money to be involved in RMA processes.</p>	

136		Individual	s10 and s20 could be restored, and s12 to refer to both - s12 says exempt from RMA under s20, then s20 says have to apply for consent within 6mths of Plan. If jetty owners have to bear the cost to gain consent to renew licence for existing jetties, and then have the jetties be for public use - council should share the cost as with other public amenities.						
137		Business/industry	introduce provisions for the consenting authority to be accountable for additional costs to applicant through the delays of the authority - not the applicant. Submitters opposing for vexatious reasons be made to bear the costs.		Develop or utilise existing codes of best practise that are practicable and understandable in industry rather than have activities clouded by extensive legislation and rules.		Develop a qualification/training for compliance inspectors etc, and have internships for new grads in environmental monitoring.	Have greater emphasis placed on the economic and social impact on farming business, their families and ultimately the community. Build into the RMA flexibility for accidental effects to give farmers confidence in how council interprets the RMA, and so harsh penalties and prosecution are not the only options.	Ensure that through the reivew, the welfare of industry are not ignored in the application of the Acts intention. Reduce the duplication of costs by bring regional councils into a division of local authorities - rationalisation of local government be explored with urgency. Revoke the extended powers of 'general competence' given to regional councils - have them focus only on core business of the council.
138	Rodney District Council	Council	Require submitters to demonstrate how they are an affected party to a proposed activity. Prohibit anti-competitive actions. Fast track applications likely to be contentious direct to Env Court with the consent of the applicant. Only key submissions should be heard, all submissions will still be read and considered. Enable council to reject frivolous or vexatious submissions. Enable env court to award security for costs. Remove Min of Consv veto rights on restricted coastal activities. Remove overlap of gaining regional and district consent for activties such as earthworks or work in streams.	Further submissions add little value to a plan change process. S274 parties should not be able to continue if primary appellatn withdraws. Provide council with greated power to reject private plan change applications. Review the basis for MUL. Provide greater significance to the functioning of rural activities e.g. farming and forestry.	Greater use of NPS and NES would give more certainty across the country.				
139	Tonkin and Taylor	Consultancy						Need to address the extreme level of protection of trout and salmon in RMA and balance the sport fishery with other environmental facotrs.	

140		Individual						Introduce guidelines that offer residents nearby to developments some protection e.g. offset distances and an offer to purchase at valuation if offset distance will constrain the project.	
141		Individual	[additional parties signed to this submission, mentions pre-election promises]	Need provision for adequate compensation where a change in a district plan dictates land use, effectively rendering farm land valueless compared to properties outside the 'catchment' of the change.					Address that individual farmers property rights are being stripped away and restrictive and costly measures are being imposed by TA's. More emphasis should be given to mitigation of environmental effects before changing land use or imposing restrictive and costly measures on farmers,
142	Patterson Pitt Group	Consultancy	Abolish the right for local authority to charge applicants who are required by rules imposed by local authority to apply for a resource consent. The local authority on behalf of the community should bear its own costs of administering such rules.						
143	Kahikatea Farms	Individual							Concerned that land will effectively be confiscated as: erosion management will require significant or complete land use change, biodiversity has potential to lock up/fence off large tracts of native forest on private land (including providing biodiversity corridors), erosion of property rights, potential for development of sloped land will become forbidden.
144	Gisborne District Council	Council	Support removal of vexatious or frivolous objections. Remove ministerial veto rights over coastal consents.						Clarify TOW references.

145	Edens Edge	Individual	<p>Change the consultation process so that requiring to consult a neighbour does not empower them to veto projects by creating unsustainable delays. Create a streamline process that will give priority to business start ups. Create a simpler process for low impact projects - simple onsite checks with all affected parties and a check sheet. Allow trade competition, frivolous or vexatious submissions to be rejected. Address the ability for the HPT to override RMZ consents. Reduce RMA and building consent process for small business to a statutory period of up to 30 days,</p>		<p>Create more certainty under the RMA over land use purchases/land use rights.</p>	<p>Align the resource and building consent processes and reduce duplication between the two. Address the ability for HPT (under HPA) to declare any land an archaeological site, stoping work, when even the police can't enter private land without a search warrant.</p>	<p>Remove having to pay DC 'development contributions' in order to get building consent or code of compliance, esp without having independent right of appeal. If these remain - make councils engage earlier in the consent process, that the request for contribution is tempered for the DC concern for the conservation of their plan.</p>		<p>Too much about the local body bureacracy, private sector planners and consultants charging high fees.</p>