Vicky Robertson  
Chief Executive  
Ministry of Environment  
PO Box 10362  
WELLINGTON 6143

Dear Vicky

DRAFT NATIONAL PLANNING STANDARDS CONSULTATION DOCUMENT – SUBMISSION BY PALMERSTON NORTH CITY COUNCIL

Thank you for the opportunity to provide a submission on the Draft National Planning Standards (DNPS) and for facilitating discussion with local government and other key stakeholders during the consultation period.

The overarching feedback from Palmerston North City Council (PNCC) regarding the DNPS is that they will act as a distraction to achieving the primary purpose of the Resource Management Act 1991, with little or no benefit to resource management and city planning outcomes on the ground.

It is unclear from the information presented how the DNPS will assist the Government with achieving progress of its three priority areas for the environment – freshwater, climate change, and urban development.

PNCC is generally supportive of the Government priorities for the environment. Given the significance of these issues to the country and the globe, it is not clear why Government is promoting national planning standards that will absorb precious time and resources to address matters such as the name of zones and colours used on planning maps.

PNCC has recently developed a new vision and a suite of supporting strategies and plans which align well with the Government priorities for the environment. Despite our Sectional District Plan Review reaching a conclusion in the coming months, PNCC has an ambitious schedule of plan changes to deliver on its new vision and strategic direction. The focus of these plan changes is housing supply and choice and improving the quality of the urban environment. PNCC also has a series of significant projects underway to improve freshwater quality and mitigate the effects of climate change. Delivering on the proposed national planning standards will act as a significant distraction to this important work.

PNCC understands that the objective of the DNPS is to promote simpler and more consistent District Plans across the country. While this is an objective PNCC supports, the benefits of the DNPS do not exceed the costs for the following reasons:
a) Many plans have recently been reviewed, including the PNCC District Plan.

b) The introduction of standard definitions will trigger a significant number of plan changes
due to the consequential amendments required to plans and there is no control and other
definitions being used to replace the role played by the standard definition.

c) Standard names for zones do not affect zone content. There is also no limit on overlays
or precincts. Standard names for zones is nothing more than promoting plan changes so
we can judge a book by its cover.

d) National Environmental Standards already exist and are a more effective tool that can be
tailored to address specific resource management issues.

e) Plan consistency is better addressed for discrete topics such as hazardous substances
and network utilities where there is less justification for local variation.

f) Plan users who use multiple plans across the country generally employ professionals to
interpret and apply plans.

g) Most non-technical plan users employ a technical expert to navigate a plan and generally
only ever engage with one plan. A small percentage of all consents require approval from
two planning authorities.

h) Many countries that already have planning standards have a far less permissive planning
regime than New Zealand which allows plans to be simpler and address high level
outcomes via planning standards. The expectation is that New Zealand District Plans are
permissive by nature (and should be more permissive). This means plans are filled with
detailed performance standards to address local or site-specific issues while maintaining
a permissive approach to development. Simpler plans would best be achieved by a new
planning regime which details high level outcomes and triggers more discretionary
planning assessments like the UK model.

The impression gained from the DNPS consultation material and roadshow discussion is that
the Ministry for the Environment is required to give effect to a legislative requirement passed
by the previous Government but is attempting to water it down as much as possible. It would
be more effective for the Government to focus its resources on reform that will drive
performance relative to its priority areas for the environment.

PNCC supports the LGNZ submission on this topic.

PNCC would welcome the opportunity to discuss the contents of this submission further with
officials from the Ministry for the Environment. If you require any further information on the
content of this submission please contact David Murphy, Acting General Manager – Strategy
and Planning on [Redacted]

Yours sincerely

[Signature]

Heather Shotter
CHIEF EXECUTIVE