

Southland Shared Services Chief Executives' Subcommittee



16 August 2018

Planning Standards
Ministry for the Environment
PO Box 10362
Wellington 6143

Our Reference: A409051

To whom it may concern

Submission on Draft first set of National Planning Standards

Thank you for the opportunity to submit on the *Draft first set of National Planning Standards*. This submission is a joint submission from Environment Southland (Southland Regional Council), Gore District Council, Invercargill City Council, Southland District Council and Te Ao Marama Inc. Our staff will also provide a separate, more detailed submission on the technical aspects of the draft National Planning Standards.

Greater alignment of Southland's Plans

The four Councils in Southland and Te Ao Marama Inc. are working towards greater integration of our Resource Management Act 1991 planning documents, including Te Tangi a Tauira, the Ngāi Tahu ki Murihiku Natural Resource and Environmental Iwi Management Plan. We are actively considering the options for integrated planning documents. It is our view that greater integration of plans is likely to provide savings for our ratepayers and result in better management of Southland's natural resources.

The draft Standards provide Southland and Gore District Councils until April 2024 to implement the proposed changes, and Southland Regional Council and Invercargill City Council until April 2026. To enable the work above to progress, we are seeking that the timeframes for implementing the National Planning Standards be aligned across the Southland councils, so that all Councils are required to implement the Standards by April 2026.

Incorporating tangata whenua values

During the mihi korero for the launch of Te Tangi a Tauira in 2008, Mātua Don Mowat referred to the iwi aspiration that the content and intent of Te Tangi would become te kōura tuia (the golden thread) that wound through Environment Southland as a business and its culture, and through all of the plans and documents that Environment Southland produced. The same would apply to the other councils. Iwi were of the view that the relationship between the councils and themselves was very

strong with an unquestionable level of trust between the parties, as reflected in the value that the word “golden” implied.

The four Councils have continued to use the “golden thread” philosophy in their iwi relationship context, and through the development of their Plans. It appears that the draft Tangata Whenua Structure Standard requires that tangata whenua values and relationships are located in a single separate chapter in a Plan. Although we are not opposed to the requirement for a tangata whenua chapter, we believe it is essential that our Plans still have the ability to use the “golden thread” approach and an understanding of the importance of Maori values and aspirations and relationships woven throughout the documents.

Electronic functionality and ePlanning

It is clear that the draft Standards for accessibility, functionality and e-Plan requirements will mean that district and regional plans will need to be electronically cross-referenced and spatially integrated. These requirements will require an ambitious work programme, which will have significant costs, and require major work to align the planning provisions. It is our view that Government should support the implementation of this Standard through providing a national ePlanning IT platform. Such a platform would ensure a greater level of national consistency for plan users and be more cost-effective than each Council establishing its own platform.

If you have any questions regarding the above, please contact Fleur Matthews at Environment Southland [REDACTED].

Yours sincerely



R A Phillips
Chief Executive Environment Southland
on behalf of the Councils of Southland and Te Ao Marama Inc