

# Auckland Council Submission to New Zealand Productivity Commission Issues Paper – Better Urban Planning March 2016

## Introduction

Auckland Council (“council”) welcomes the New Zealand Productivity Commission’s (the “commission”) issues paper on *Better Urban Planning*.

Council supports the commission’s “blue skies” and first principles approach in its review of New Zealand’s urban planning system<sup>1</sup>. This approach will help to identify the most appropriate system for allocating land use to support desirable social, economic, environmental and cultural outcomes. This approach will also create a platform for a much needed discussion regarding the principles underpinning a planning framework upon which future reforms might be judged.

Council has provided the commission with submissions to its two previous relevant inquiries, namely *Housing affordability*<sup>2</sup> and *Using land for housing*<sup>3</sup>. In responding to the commission, Council has followed the commission’s “blue skies” approach. Council recommends that the commission refers to the evidence provided by council via those previous inquiries in conjunction with this response.

Council has worked with Auckland Transport in the preparation of this submission. Council’s submission is in general alignment with Watercare Services Limited’s separate submission to the commission.

Council recognises the relationship of this review to a number of other initiatives in the government’s wider reform programme. This programme includes development of a National Policy Statement on Urban Development<sup>4</sup> and the Resource Legislation Amendment Bill<sup>5</sup> currently before Parliament. While council will continue to be an active participant in the current legislative reform process, it recommends that government refrains from further reforms until the commission’s inquiry is complete.

## Council’s submission

Council sees value in the commission’s “blue skies” approach, and stepping back from status quo to think about the urban planning system needed for New Zealand’s future. Council’s submission seeks to identify the key components and aspects of principles of a fit-for-purpose urban planning framework.

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<sup>1</sup> The Ministry for the Environment defines urban planning framework as “the statutory and governance frameworks that incorporate decisions by councils, central government, and the private sector about urban spaces.

<http://www.mfe.govt.nz/publications/rma/building-competitive-cities-discussion-document>

<sup>2</sup> Auckland Council’s submission on the draft report on Housing Affordability, February 2012.

<http://www.productivity.govt.nz/sites/default/files/DR142%20-%20Auckland%20Council%20Draft%20Report%20Submission.pdf>

<sup>3</sup> Auckland Councils submission on the Using Land for Housing draft report, August 2015.

<http://www.productivity.govt.nz/sites/default/files/DR142%20-%20Auckland%20Council%20Draft%20Report%20Submission.pdf>

<sup>4</sup> Proposed National Policy Statement on Urban Development. [www.mfe.govt.nz/more/towns-and-cities/managing-urban-development-nz/developing-proposed-national-policy-statement](http://www.mfe.govt.nz/more/towns-and-cities/managing-urban-development-nz/developing-proposed-national-policy-statement),

<sup>5</sup> Resource management reforms [www.mfe.govt.nz/rma/rma-reforms-and-amendments/about-resource-management-reforms](http://www.mfe.govt.nz/rma/rma-reforms-and-amendments/about-resource-management-reforms),

This submission sets out those principles by which future proposals for an urban planning framework can be judged and provides examples of what adhering to those principles would mean in practice. To do this, council has framed this around outcomes an urban planning system seeks to achieve. These principles are broad ranging and at a high level generally address the questions posed in the issues paper.

Council understands that the next stage of the inquiry will require more detailed framework design which may involve comparative review and analysis of current and previous systems. The examples provided in this submission are intended to provide a pointer towards the more detailed requirements in the next phase.

The submission is set out around three key themes:

- urban planning as a system
- planning for future funding challenges
- informed decision making and public engagement.

## **National context**

Fundamentally, the Resource Management Act 1991 (RMA) is the key planning legislation and the Land Transport Management Act 2003 (LTMA) and the Local Government Act 2002 (LGA) are the key pieces of investment legislation within the New Zealand national urban planning context. Planning and investment are intrinsically connected, especially in urban areas and even more so in urban areas experiencing growth. When planning decisions are made consideration must be given to their investment implications. The ability to do this is limited under the RMA. Similarly, when investment decisions are made there needs to be consideration of their planning implications, such as how different transport investments might support or undermine the urban form that will work for communities.

The Ministry for the Environment (MfE) noted in 2010 that the lack of alignment and connection between the RMA, LGA and the LTMA has created a complex regulatory environment, with little integration between strategies, regulation, expenditure and decision-making<sup>6</sup>. MfE cites as an example the plans under the different Acts that all have separate timeframes, processes and consultation requirements resulting in duplication of work and lack of clarity.

In addition to the government reforms noted above, there is a high level of interest amongst other agencies and organisations seeking to understand the underlying issues.

Local Government New Zealand<sup>7</sup> (LGNZ) has undertaken a blue skies review of the resource management system, questioning of whether it is still fit for purpose. The LGNZ paper discusses the sometimes uncomfortable relationship between the RMA, the LGA and

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<sup>6</sup> Building Competitive Cities: Reform of the urban and planning infrastructure planning system, Ministry for the Environment, October 2010. <http://www.mfe.govt.nz/publications/rma/building-competitive-cities-discussion-document>

<sup>7</sup> A 'blue skies' discussion about New Zealand's resource management system, Local Government New Zealand, December 2015. <http://www.lgnz.co.nz/home/our-work/publications/a-blue-skies-discussion/>

the LTMA. Like MfE, LGNZ notes the lack of connection between the planning, funding and delivery elements of the resource management system.

The New Zealand Council for Infrastructure Development (NZCID) has also looked at the effectiveness of New Zealand's local government system, and the planning and statutory framework within which local government operates. Echoing MfE, NZCID is of the view that land use planning and resource management decisions under the RMA remain disconnected from investment decisions made under the LGA and LTMA, despite decades of continued amendment. NZCID posits that weak integration between planning and investment, and urban growth and infrastructure is a consequence of this lack of connectivity (p4)<sup>8</sup>.

Council concurs with the view that this disconnect between the relevant pieces of legislation is at the heart of shortcomings of the current planning system.

### **Auckland context**

Auckland's population is projected to reach more than 2.2 million by 2043, requiring additional and new types of housing services and infrastructure. This growth poses significant challenges for the alignment of investment and planning decisions required to house Aucklanders and deliver significant infrastructure required for the future. There is also pressure on productive rural land in some areas. Auckland's success in accommodating and supporting growth while managing the natural and physical environment will be a determining factor in Auckland's future success.

### **Principles**

Long term planning involves consideration of multiple outcomes which sometimes requires trade-offs to be made. This is carried out in a way that supports a growing economy, ensuring that the region is resilient, and that both the built and natural environment's assets are managed and maintained.

Council has taken its cue from the commission's terms of reference and has focussed on identifying aspects of the key principles that should underpin New Zealand's future planning framework. This submission does not attempt to critique previous or ongoing reforms to the legislative and policy framework that make up the urban planning system. Council anticipates that the commission's final recommendations will be outcomes focussed.

There are a number of principles that underpin New Zealand's current legislative planning system. Council encourages the commission to think about the appropriate principles that could underpin any future planning framework in light of some existing principles (not exhaustive):

- the ethic of stewardship and kaitiakitanga (RMA)
- the protection of customary rights (RMA)
- sustainable management of resources for present and future generations (RMA)
- that public participation results in more informed decision-making and better environmental outcomes (RMA)<sup>9</sup>

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<sup>8</sup> NZ Council for Infrastructure Development's Proposal for local government and planning Law reform, August 2015 [http://www.nzcid.org.nz/Story?Action=View&Story\\_id=120](http://www.nzcid.org.nz/Story?Action=View&Story_id=120).

<sup>9</sup> Observation made by the Court of Appeal in *Murray v Whakatane District Council* [1999] 3 NZLR 276.

- that the people affected by a decision should be provided with reasonable access to relevant and appropriate information (LGA)
- that commercial transactions should be undertaken in accordance with sound business practices (LGA)
- meeting the current and future needs of communities for good-quality local infrastructure, local public services, and performance of regulatory functions in a way that is cost-effective for households and businesses (LGA)
- value for money in operations spending, that exhibits a sense of social and environmental responsibility, and transparency (in accounting for revenue/spending) (LTMA).

The Auditor-General recently examined the co-governance of natural resources, drawing on examples across New Zealand, and identified some principles to consider when setting up and maintaining effective co-governance and co-management arrangements<sup>10</sup>. These are worth considering in light of any potential new principles, including:

- build and maintain a shared understanding of what everyone is trying to achieve
- involve people who have the right experience and capacity
- be accountable and transparent about performance, achievements, and challenges and plan for financial sustainability and adapt as circumstances change.

## Urban planning as a system

### *Outcomes focus*

An effective urban planning system must be able to provide certainty around place based outcomes. The system must then also provide flexibility in the process and the tools that can be used to achieve those outcomes.

Within the current system, plan development (including plan changes and notices of requirement) and the decision making process can take a long time. This can result in district plans which are not fit for purpose due to their age<sup>11</sup>. This can reduce certainty for land owners, developers and the wider community.

While certainty of outcome is critical, there is a need to strike a balance between fixing current problems and challenges, and anticipating future needs and problems. Planning systems need to be dynamic and provide the flexibility to respond to a changing context, for example, unexpected rates of population growth, global market shocks or a catastrophic natural event. Changes in culture, attitudes or technology can be less instantaneous and more gradual but also require flexibility. The systems must enable responses to opportunities not previously anticipated and to new information.

Ongoing changes to the planning framework have tended to focus on improving processes and reducing costs and delays in the consenting process. While this is important and helps to provide greater process certainty for those involved, it can result in undue focus on process and compliance, potentially losing sight of the overall outcomes sought. A good

<sup>10</sup> Principles for effectively co-governing natural resources, Office of the Auditor-General, February 2016. <http://www.oag.govt.nz/2016/co-governance/docs/co-governance.pdf>

<sup>11</sup> e.g. the district plan for the Isthmus area of Auckland Council was notified in 1993, made operative in 1999 and is still in use.

planning system must provide sufficient flexibility to keep the big picture in sight when making day to day decisions.

Based on the above, a principle around certainty and flexibility should address the following components:

- achieving certainty of outcomes for all parties
- ensuring there is flexibility to respond to a changing environment, circumstances and new information
- flexibility in the process and approach to support achieving the best outcomes, and allow for ongoing innovation.

### *Evidence base for understanding*

It is essential that there is a solid and shared evidence base to inform policy and plan development and to support decision making. Difficulties arise when different agencies, organisations, stakeholders and community groups either do not use the same data and evidence to inform their views and/or do not understand the basis or tools used for this evidence. Assumptions and limitations underpinning data used for evidence need to be made explicit.

The costs of greenfield versus brownfield development in the Auckland context is an example of where lack of a common evidence base has caused confusion and unnecessary debate. A greater understanding about levels and types of growth and decisions about where it should occur will ultimately speed up the decision making process, and reduce the time and cost spent on challenging the legitimacy of the evidence.

In its December 2015 discussion document<sup>12</sup>, LGNZ notes the growing trend towards increasingly participatory planning processes which, in turn, rely on quality data that can be interpreted for public audiences (p. 38). This will increasingly drive an expectation that local authorities will make this information more accessible to all to enable more informed participation in the process. The transportblog ([www.transportblog.co.nz](http://www.transportblog.co.nz)) is evidence of increasing demand for engagement in public decision making and the desire for access to technical data.

A useful example is the Joint Modelling Application Centre, which was established to enable transport and traffic modelling in Auckland that is robust, reliable, and up-to-date. The partnership between council, AT, and NZTA provides consistent modelling services to assist stakeholders and support informed decisions about the way the transport system in Auckland operates and develops. This provides confidence in the quality of the data and ensures all agencies are talking the same language.

Another example of developing a joint data set is the joint metadata (shared data) standards project across central and local government. Initiated in 2014 by Wellington City Council, Auckland Council, Christchurch City Council and NZTA, these agencies led the development of national metadata standards for New Zealand's road network. This project aims to

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<sup>12</sup> A 'blue skies' discussion about New Zealand's resource management system, Local Government New Zealand, December 2015, p.38. <http://www.lgnz.co.nz/home/our-work/publications/a-blue-skies-discussion/>

develop national metadata standards for the 3-waters (potable, waste and storm) network, and for residential and light commercial buildings<sup>13</sup>.

Based on the above, a principle around a shared evidence based understanding and decision making should address the following components:

- robust evidence base for decision making
- a common set of data across agencies used in policy and plan making
- assumptions and limitations of data are explicit
- working jointly to achieve good outcomes
- information that is accessible (obtainable, understandable, and available in a range of forms).

### *Efficient and effective*

The purpose of local government includes the requirement to perform regulatory functions in a cost effective manner. A planning process that is complex and takes a long time to work through may fail to meet that requirement with costs accruing for both the regulator and the user. The time taken to advance a major plan review from consultation to decisions is problematic. Conversely, taking an integrated master-planning approach to a project can make the consenting process efficient and effective.

However, the more processes get truncated to simplify and shorten them to make them more efficient, the greater the risk that individual concerns could be marginalised or overlooked. Any revision to the planning system needs to keep in mind the lack of equality between participants representing different interests.

Against that background it must be understood that short term gains can create long term problems and that taking a long term view needs to be a feature of any good planning system. This will enable the identification of possible future scenarios that prevent going down a track that will be hard to turn back on. The Auckland legislation supports this long term futures approach through the requirement to develop a comprehensive long term 30 year spatial plan for Auckland's growth and development. Based on council's experiences, this spatial plan provides a good starting point for a future planning system in that it integrates the many elements and planning needs to address and plan for. Clear strategic direction through such a spatial plan should be enduring, and be used to prioritise subsequent planning decisions and funding.

Based on the above, a principle around efficiency and effectiveness should address the following components:

- there is clarity of roles/functions, responsibilities, and processes
- enables and incentivises good planning outcomes
- there is balance to ensure that the costs of the system do not outweigh the overall societal benefits.

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<sup>13</sup> <http://www.linz.govt.nz/about-linz/what-were-doing/projects/metadata-shared-data-standards-project>

The above section responds in part to the following questions posed by the commission:

Q4 Thinking beyond the existing planning system, how should diverse perspectives on the value of land be taken into account?

Q5 Thinking beyond the existing planning system, how should the property rights of landowners and other public interests in the use of land be balanced?

Q8 Are complicated rules needed to control complex social systems? What are the alternative approaches for dealing with complexity?

Q22 Should more decisions about land use rules be made by property owners privately (for example through covenants)?

## **Planning for future funding challenges**

Auckland needs a planning system that will work for its communities and address the implications of growth. Any new urban planning system should be designed to meet future challenges. A key area where this is necessary is the planning, policy, funding, financing regulation and development of infrastructure.

Auckland is home to the largest urban population in the country. Continued population growth is driving the expansion of city services as more of Auckland becomes urbanised. Prior to amalgamation, years of underinvestment in regional infrastructure and the inability to sequence or prioritise on a regional basis have resulted in under-provision that is constraining sustainable growth. Growing population pressures and rising land prices accelerate the need for timely and coordinated infrastructure provision. If such infrastructure is not provided or, at least its land secured in a timely manner, costs will rise significantly.

Auckland's urban growth places enormous pressure on current and future residents. The total additional area needed to provide for new growth within the Proposed Auckland Unitary Plan (PAUP) is more than 1.5 times the area of urban Hamilton. Many of the projects essential for enabling urbanisation in Auckland cost hundreds of millions of dollars. For example, as outlined in Auckland Transport's evidence to the Independent Hearings Panel, the 'trunk' transport infrastructure for the 'Future Urban Zone' land in the PAUP has been estimated to cost \$5.9 to \$7.7 billion<sup>14</sup>. The lead time for this infrastructure is significant. For example, evidence to the Independent Hearings Panel on the PAUP cited a 10-year time period to complete the consultation and consenting requirements for the \$734 million (excluding enabling works) Central Interceptor to store and convey wastewater.

Certainty is crucial for developers, infrastructure providers and residents. The current complexity of the urban planning system and its fragmentation across a number of acts (i.e. LGA, RMA and LTMA) can create a lack of alignment between the processes inherent in delivery.

To this end, council has developed the Future Urban Land Supply Strategy (FULSS) and has adopted its first (legislated) 30 year Infrastructure Strategy as part of its Long-term Plan 2015-2025. The purpose of the FULSS is to identify sequencing and timing of the rezoning of Future Urban zoned land and bulk infrastructure readiness over the next 30 years. It is

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<sup>14</sup> Joint Statement of Evidence of Theunis van Schalkwyk, Evan Keating, Scott Macarthur and Alastair Lovell (Auckland Transport) on Topics 016/017 – Rural Urban Boundary.

intended to provide certainty for the community, including developers, on when council is programming land use planning and infrastructure planning and delivery (development-readiness). The Strategy is underpinned by a suite of principles to assist with understanding which areas will achieve the greatest benefits for Auckland over the short, medium and long term timeframes of the Strategy. These principles are: optimise the outcomes from investment; supply land on time; support uplifting Māori social and economic wellbeing; create good quality places; and work collaboratively in partnership.

An urban planning system is fundamentally comprised of planning, infrastructure and investment decisions. These decisions need to be well integrated. In such a planning system, planning decisions and rules would be cognisant of the consequences for investment, and likewise infrastructure provision. Another consideration is how the scale of development determines the level of infrastructure investment required and its timing.

There may be scope to increase the use of economic tools in a future planning system but caution would be needed to ensure that they were not seen simply as revenue generating nor had disproportionate effects on different groups of people. An example of where such economic tools have been successfully used is Auckland Transport's CBD parking policy<sup>15</sup>. The policy was introduced in 2012 based on demand responsive pricing and has increased customer satisfaction, parking availability and reduced the number of parking infringements issued.

Based on the discussion above, a principle of planning for future funding challenges should address the following:

- phasing and sequencing of infrastructure development needs to be future-focussed to ensure infrastructure remains fit for purpose by the time it is delivered
- land use/supply needs to be coordinated and integrated with infrastructure provision and funding i.e. one should be timed to match the other
- funding tools and mechanisms are available to enable the planning, sequencing and delivery of infrastructure, and are tied to development of land
- there is a balance between fixing current problems and challenges and anticipating future needs
- utilisation of economic tools in specific circumstances, such as road pricing.

The above section relates in part to the following question posed by the commission:

Q24 Are there opportunities to make greater use of economic tools such as prices, fines and user charges in a future planning system? Where do these opportunities lie? What changes would be required to facilitate their use?

### **Informed decision making and public engagement**

Council supports informed decision making by publicly elected representatives, close to the people and places that are impacted by those decisions. Quality decision making relies on robust information, made available in a comprehensible way to all interested parties.

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<sup>15</sup> Auckland Transport Board report, 19 April 2013, pages 25-27. <https://at.govt.nz/media/imported/3734/agenda-item-7.pdf>

Public engagement is a key tenet of urban planning and the wider planning system in New Zealand. Council values engagement as a part of the democratic process and recognises that better decision making is made possible with public engagement.

The LGA currently sets a consistent approach to public engagement for all councils. Council supports these underlying principles as supportive of more effective, informed decision making:

- conduct business in a clear, transparent and democratically accountable way
- operate in an efficient and effective manner
- be aware of and have regard to the views of all their communities
- take account of the diversity of the community's interests, both current and future.

Council recognises that there is potential for imbalance in the views it receives due to:

- the complexity and misalignment of the current planning system potentially acts as a barrier to engagement
- the ability to engage specialist advice is not universal and can act as a barrier to engagement
- land owners and rate payers are incentivised to engage in a way that renters and non-ratepayers are not.

Council supports meaningful engagement early in the decision making process. This means streamlined consultation, focussed at strategic level early, on in the process.

Council also supports transparent engagement with the community on an agreed evidence base that is easily understood and can be examined. This will be presented in an accessible way, on the possible outcomes, impacts and trade-offs of a decision making process on current and future residents.

Based on the above, a principle of informed decision making and public engagement should reflect the LGA principles cited above and address the following components:

- active and early engagement on policy that uses clear, easily understood evidence
- clarity on the possible outcomes, impacts and trade-offs of a policy on current and future populations and resources
- cognisance of the potential for imbalance in engagement when having regard to all the views of all the community
- front loading early engagement on high level policy to reduce the need to re-litigate matters through more detailed plans and consenting processes.

The above section responds to the following questions posed by the commission:

Q9 What principles around consultation and public participation should the Commission consider in the design of a new urban planning system?

Q10 Thinking beyond the existing planning system, what should be the appropriate level of consultation in making land use rules or taking planning decisions?

**Local board comment received as input into the development of  
Auckland Council's submission on the Productivity Commission inquiry on  
Better Urban Planning**

## **Upper Harbour Local Board**

### **Feedback on Productivity Commission's 'Better Urban Planning Issues' discussion document**

1. The Upper Harbour Local Board (the Board) welcomes the opportunity to provide comment on the Productivity Commission's 'Better Urban Planning Issues' discussion document. The Board considers this an important piece of work, as there is great potential to improve the current urban planning system to meet the challenges presented by increased growth and development.
2. However, it is difficult to provide lengthy and detailed comment in general, as the initial thinking is still high-level and lacks specific detail upon which to provide views. The Board would appreciate the opportunity to comment further once the Productivity Commission releases specific proposals later this year.
3. The Board believes there are very few opportunities for it to meaningfully engage in the approval of resource consents, and would like to see more meaningful involvement in decisions that have local impact. This should not be taken to mean, however, that the Board expects to be decision-makers on resource management issues. Improved engagement could occur through dialogue with developers and planners at an earlier stage of the consents process, which would ensure that local views and concerns are known and understood from the outset. Such involvement would provide the opportunity for projects and consents to be amended before it becomes too late or expensive to make alterations.
4. In addition, the Board would support improved public involvement in planning and resource management decisions as part of a new approach. The Board believes that current levels of public engagement is lacklustre for a number of reasons:
  - a. plans and rules are often too complex to expect a reasonable level of understanding from the public, so it is difficult for the general public to provide an informed opinion;
  - b. the inability of the public to be involved in the process if they weren't involved from the start;
  - c. inaccessible communications that do not clearly indicate how the public will be affected from the proposed changes; and
  - d. situations arise where the public may want to be involved, but are unable to do so because the process precludes it (such as the out of scope changes put forward for the Proposed Auckland Unitary Plan).
5. The Board has a vision for a practicable engagement and consultative process that is accessible, prioritises informed submissions and minimises the opportunity for special interest groups to hijack or delay proceedings.

## **Kaipatiki Local Board comment on 'Better Urban Planning' issues discussion document**

### ***Planning systems in general***

The Kaipatiki Local Board believes that in general, planning systems should be outcomes based and measured / assessed against strong design outcomes. In the Board's view, planning systems that are strongly driven by rules often deliver poor outcomes, as seen in the development of the Glenfield Mall, in that the end design lost many architectural elements in order to comply with current planning rules. The Board can also cite several similar examples of infill housing developments in the local board area where design outcomes have been sacrificed to in order to comply with planning rules.

It is imperative that planning outcomes should be supported by rules, but where there is conflict (e.g. outcomes are achieved that breach some aspects of rule provision) the resultant outcomes should supersede rules. For example, it is quite likely that planning rules did not support the Sydney Opera House, but the resultant outcome produced an iconic structure known the world over.

Outcomes and end results should 'gazump' the rules if it is determined that a particular development or structure is in the best interest of a city, and delivers on local authority planning policy statements.

### ***Reflections on the current system and Resource Management Act (RMA)***

The Kaipatiki Local Board believes it is imperative that protection of the environment remain at the core of any new planning system, as this was an essential component of the RMA. In general, the Board supports the original intent of the RMA and believes that the majority of its objectives have been achieved.

However, there are some elements of the current system that could be changed. The 'shifting baselines' of the current system make it difficult to achieve good, consistent urban outcomes. Applying for consents through a staged process allows too many rules to be broken incrementally, which can lead to an undermining of the original intent and purpose of the RMA over time.

In some aspects of the current resource management system there is insufficient flexibility, and too much prescription with a focus on activities rather than end results. In addition, some of the requirements and information needed to successfully navigate the resource consenting process makes it onerous to complete. As an example, the Board is aware that a recent applicant needed to provide information relating to the fire rating of an existing timber floor that was installed in the early 1940s to achieve consent for an internal fit out. Such information requirements are unrealistic and do not relate to the intent and purpose of the RMA.

The Board would support amendments to the resource consenting process that make it easier for applicants to understand, navigate and complete the necessary steps in a timely and cost-effective manner.

### ***Local decision-making on resource management issues***

In general, the Kaipatiki Local Board would support reversion of responsibilities back to central government over some areas of resource management. In particular, the Board would support the reversion of responsibilities with regard to genetic modification (GMO) back to central government.

In some instances, too much local decision-making on resource management issues can lead to 'mob rule' and poor decision-making. The poor quality of information, misinformation, and the politics of local communities may on occasion negatively impact local decision-making, which can limit the influence of rules-based resource management systems. This can lead to a negative impact on the quality of outcomes achieved through resource management processes.

The Board would be supportive of some form of 'holistic' oversight of matters that affect two or more neighbouring local authorities. It is possible that two neighbouring authorities can have differing rules on the same issue, which can lead to different outcomes in nearby areas. In particular, the Board would be supportive of a holistic, combined management of water-related issues across local authority boundaries to ensure consistent outcomes are achieved.

### ***Consultation and public participation***

The Kaipatiki Local Board believes that a high level of expertise is currently required for meaningful or effective input into resource management decisions. The current process is onerous and complex, and in general the wider public does not have the expertise or professional knowledge to meaningfully participate in the process.

This may lead to resource management processes being 'hijacked' by professionals or experts, thus diluting the voice and influence of the general public. Often times it appears that that the 'weighting' of input from different groups (e.g. iwi, or submissions lodged by professionals and experts who have the resources and knowledge to navigate processes) may supersede that of the general public.

However, the Board believes it is important that the general public retains the ability to input into resource management processes, and would not support any reduction or limits placed on requirements to publicly consult beyond those that are currently in place. Although the process can be complex to navigate, input provided by the general public has and will continue to improve the quality of decision-making.

### ***Additional comments***

- The Kaipatiki Local Board believes that planning rules are not going to address the issues of declining cities. These matters need to be addressed at a central government policy level (such as through the introduction of a population policy), and by consideration of incentives / removal of several barriers within national urban planning policy in order to support declining centres. A good example of such an approach is the free tertiary education programme in Invercargill.

- The Kaipatiki Local Board believes there must be clear understanding and certainty as to how central government will support infrastructure development for growing cities. It is imperative that central government improve its forward planning processes to respond to growth.