

Proposed planning standards lacking

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The Government's National Planning Standards, aimed at reducing the time and cost involved in developing and using planning documents, looks unlikely to be of much benefit to the water sector in the near future unless the Government changes tack in response to submissions.

The initiative aims to create a nationally consistent framework of all planning documents – such as regional policy statements, coastal policy statements, regional plans and district plans – that councils will have to follow.

The Government aims to develop the standards in phases. The first set of standards is currently under development and must be gazetted by April 2019. The implementation period for councils is expected to be between one and five years after that.

Water New Zealand sees value in the principle of having national planning standards. A consistent approach to planning would make navigating the planning and consenting system much easier and quicker, and could potentially reduce disputes about some technical matters such as the use of metrics.

Unfortunately, the proposed scope for the first set of standards has so far excluded many elements that would have been of most value to the sector.

The bulk of work has been on how to develop a common approach to the structure, format and accessibility of planning documents. This includes how objectives, policies and rules are organised, some standardisation of mapping conventions, as well as requirements for the electronic functionality and accessibility of planning documents.

Some work is being done on harmonising the zones used in district plans as well as some definitions and metrics identified through a prioritisation process. The prioritised definitions and metrics largely relate to building and infrastructure related matters, although those of most relevance to the three waters sector were kicked for touch.

The initial engagement phase was completed at the end of July 2017 and was about testing whether the proposed scope is about right or not. In our submission, Water New Zealand said



that a flawed prioritisation process was used – it was assumed greater benefits could be gained by focusing on terms found in district plans rather than in regional planning documents.

Not enough attention was given to identifying which definitions and metrics are the most problematic and therefore are associated with the most costs. We understand these views have also been expressed by other stakeholders the Ministry for the Environment has heard from across the country.

Water New Zealand also encouraged the Government to consider how the national planning standards could support more consistent implementation of national direction that is currently underway. For example, the Land and Water Forum (of which Water New Zealand is a member) recently completed a commentary on implementation of the National Policy Statement on Freshwater Management (NPSFM).

It identified a number of implementation challenges where greater consistency and national direction was needed. For example, there is confusion and too much inconsistency in how freshwater objectives and the methods to achieve them (including limits) should be laid out in regional plans. With implementation of the NPSFM into regional plans due to be completed by 2025, it is an opportune time to tackle these issues now.

Similarly, there will also be some matters currently being investigated as part of the Government Inquiry into Havelock North drinking water that could be anticipated and picked up

in the first set of standards to ensure they are addressed in a timely way.

For example, there could be a requirement to identify ‘source protection zones’ for drinking water supply areas as spatial layers in plans. This is not currently a regulatory requirement, although it is an emerging good practice to help manage the land use and environmental variables affecting the security of drinking water sources.

There is no doubt that some tough prioritisation will be needed to deliver the first set of standards by 2019. While no timeline has been provided for subsequent phases of standards development, regional and local planning processes do need some stability to manage the cost impact to ratepayers. Frequent changes to the standards would not be desirable.

This is why Water New Zealand has said that some issues should be tackled now rather than later. It would mean more effort up front, but it would deliver benefits that would not be realised to the same extent if the work was delayed to subsequent phases.

The next step is drafting and testing and this will continue until at least April 2018 followed by a further round of submissions.

Water New Zealand will continue to monitor developments and advocate for members. If you have views about the standards, we’d love to hear from you.

You can find our submission on the Water New Zealand website. [WNZ](#)