



RUAPEHU DISTRICT COUNCIL

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To: Committee Staff
Environment Committee
Parliament Buildings
Wellington

en@parliament.govt.nz

Subject: **Natural Built Environment Bill and Spatial Planning Bill**

Submission from: Ruapehu District Council
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Council does not wish to speak in support of its submission.

The Ruapehu District ... where adventure begins!



1 ACKNOWLEDGEMENT

- 1.1 Ruapehu District Council (RDC) thanks the Environment Committee (the Committee) for the opportunity to submit on the Natural Built Environment Bill and the Spatial Planning Bill.
- 1.2 The resource management system is central in how we manage our natural environment and built environment, including urban development, housing supply and regional economic development. RDC supports the need for resource management reform. Aotearoa New Zealand's current resource management system is complicated and time consuming. It does not provide the best outcomes for our natural and built environments, or our communities.
- 1.3 Both Bills will result in wide reaching change, and they are of a significant scale and size. Given the length and complexity of the Bills, and the tight submission time frame, our submission focuses solely on the key issues that are relevant to us as a small rural local authority. We acknowledge that there are other issues that are not addressed in our submission and that those issues require careful consideration. Accordingly, we endorse the submissions of Taituarā and Local Government New Zealand (LGNZ) who expand on, and deal with, some of those issues.

2 ABOUT US

- 2.1 The Ruapehu District is a land-locked area covering 6,733km², with a usual resident population of 12,309 (Statistics NZ, Census 2018). Ruapehu is one of New Zealand's largest districts by land area, however, has a relatively small and dispersed population base with one of the lowest resident population densities in the country (0.02 persons per hectare).
- 2.2 The Ruapehu District has high levels of deprivation compared to other parts of the country. We have a strong primary industry sector and despite Covid, the Ruapehu District is also a growing tourist destination and enjoys a significant and steadily increasing number of visitors and non-permanent residents each year. The Ruapehu District receives approximately 1.2 million visitors annually, and although the district's usual resident population is lower, the population goes up to approximately 28,000 on our peak day.

3 SUMMARY

- 3.1 In principle, RDC supports central government's five objectives for the reform, which are to:
 1. Protect and restore the environment and its capacity to provide for the wellbeing of present and future generations.
 2. Better enable development within natural environmental limits.
 3. Give proper recognition to the principles of Te Tiriti o Waitangi and provide greater recognition of te ao Māori and mātauranga Māori.
 4. Better prepare for adapting to climate change and risks from natural hazards, and better mitigate emissions contributing to climate change.
 5. Improve system efficiency and effectiveness and reduce complexity while retaining appropriate local democratic input.
- 3.2 RDC's primary concerns about the proposed reform are:



1. The loss of local voice
2. Funding and resourcing for local authorities
3. What the transition will look like
4. How the different reforms will tie together.

4 THE LOSS OF LOCAL VOICE

- 4.1 The loss of local voice is the fundamental concern for the local government sector in relation to the resource management system reform. The ability of local authorities and communities to contribute to decisions made under the new system is severely reduced. This reduction in local voice will make it difficult to accurately capture and protect the uniqueness of communities when making planning decisions under the new regional planning system.
- 4.2 Local authorities remain central to the operation of the resource management system. They will be responsible for implementing the regional plans via the consenting, compliance, monitoring and enforcement process, but are not in control of the planning process and have a limited ability to influence the major decisions in the regional plans. Having a single representative of each council as a member of the regional planning committee is not enough to effectively represent small rural communities. This structure threatens local placemaking and will result in a loss of local voice.
- 4.3 There are stark contrasts between different communities i.e., socioeconomic conditions, differences between urban and rural communities, variations in population sizes, areas of high growth, and areas of low growth. Those contrasts exist within the Ruapehu District and are challenging to represent, so it is difficult to see how a Regional Planning Committee will be able to capture and protect the unique qualities of small communities such as Ōhura, Kakahi, Raetihi and Rangataua when making planning decisions. Local communities are effectively excluded from the decision-making process, which will result in a loss of local voice. It is essential that the Committee ensures communities are heard in the new regionalised system.
- 4.4 The loss of local voice is also a substantial concern from a Māori perspective. There are various iwi and a multitude of hapū within the Ruapehu District. It is difficult to see how one or two Māori representatives on a Regional Planning Committee can successfully and genuinely represent the collective group of iwi and hapū within the Ruapehu District when making planning decisions.

5 FUNDING AND RESOURCING FOR LOCAL AUTHORITIES

- 5.1 RDC agrees with the local government sector's concerns regarding how the reform is to be paid for, including the transition to the new system. It is of critical importance that all aspects of the resource management system reform are equitably funded. As LGNZ state in their submission, "*transformative reform requires transformational resourcing by central government*". Local government, and in particular small rural local authorities like RDC, are under enormous financial pressure with limited ability to increase rates. The Ruapehu District has one of the highest deprivation levels in the country, with a National Ranking of 7 out of 68 and a Deprivation Index level of 9 out of 10 (10 being the highest). RDC's financial challenges are substantial, and the demographics of the Ruapehu District make increasing rates to assist with funding the new resource management system unfeasible. The required financial assistance must come from central government. Significant funding commitments



will be required to implement the new system and to establish the new bodies if the new system is to be successful.

- 5.2 Another funding issue of significant importance is the resourcing of iwi. RDC supports the greater role iwi and hapū are being given in the new resource management system, however central government need to work with iwi and hapū to provide them with the necessary resourcing, both financial and investment in the upskilling of iwi and hapū members, so they can effectively participate in the new system. A plan should be made to work through these issues from the outset.
- 5.3 RDC agrees with and endorses both Taituarā and LGNZ’s recommendations to the Committee regarding how the new system is to be funded, and in particular the recommendation that the Committee works with the Office of the Auditor General to develop guidance for local authorities on how to incorporate the new activities into the Long-Term Planning process.

6 TRANSITION AND IMPLEMENTATION

- 6.1 There is a lack of clarity regarding the transition from the existing system to the new system. This lack of clarity is of concern, particularly to a small local authority like RDC that has limited resources available to undertake the work required under the existing system, let alone the additional resources required to transition to the new system. Central government guidance is required to clarify when work should stop on existing Resource Management Act plan changes, and when preparation is to begin for the transition. It would be a waste of valuable resources undertaking unnecessary work due to a lack of clarity around the transition from the existing system to the new system.
- 6.2 RDC supports the indication from the Ministry for the Environment that the the new system will be implemented in tranches, based on regional groupings, over a 10-year period. It is however concerning that there is a lack of clarity around who will be in each tranche, and that no clear process or criteria for tranche selection has been outlined. The speed of implementation has also not been addressed. It is important that regions who are ready and have the capacity to implement the new system are able to, and that regions who are not ready are able to wait for a later tranche. Having the ability to learn from the “pilot” regions will be crucial to the overall success of the new system. Clarity and certainty are required for local authorities on what the transition will look like for each region, as soon as possible. Central government guidance on how local authorities are to incorporate the reforms into current work programs is also required, given the uncertainty around when aspects of the new system come into effect.

7 ALIGNMENT WITH OTHER LEGISLATION AND REFORMS

- 7.1 Given the significance of the resource management system reform, it is essential that the new system aligns with other legislation and the other reforms that are currently underway. There are several significant reforms taking place that affect local authorities, i.e., Three Waters, Future for Local Government, Climate Change, Freshwater Management, and Indigenous Biodiversity. It is unclear how these significant reforms will align and integrate with the new resource management system.
- 7.2 The delay in the introduction of the Climate Adaptation Act is of concern. The three new pieces of legislation are meant to work together to transform the resource management



system, but it is difficult to see how that will be achieved as the Climate Adaptation Act has not advanced with the other two pieces of legislation.

- 7.3 The submissions of Taituarā and LGNZ adequately outline the sector wide concerns in relation to the lack of clarity around how the different reforms will tie together, and RDC supports their respective recommendations.

