

28 February 2022

**To: Ministry for the Environment**

Thank you for the opportunity to submit further on the resource management reform programme. The Kapiti Coast District Council is broadly supportive of the objectives of the reform to create a more effective and efficient resource management system that better protects our natural environment while providing for appropriate development and recognises te ao Māori in the system.

We are, however, concerned that there is still very limited detail available on many aspects of the reform programme. It is often this very detail that makes all the difference for implementation and the impact the proposed changes will have on our role in the system and on our communities. While specific feedback on the questions posed by the discussion document is provided in the attached document, we would like to highlight five overarching themes that broadly encompass our concerns with the proposed reform package below.

**1 Concerns regarding loss of local decision-making and input**

The proposed shift to decision-making by joint committees for both NBA plans and Regional Spatial Strategies (RSS) leaves much less opportunity for local elected members to influence these key documents, and the proposal lacks clear detail on the role of territorial authorities (TAs) within the proposed system. The nuances of these roles and responsibilities will have a significant impact on the level of influence TAs will have in the resource management decisions that will affect their districts. It is difficult to create a clear view of what this system will look like, particularly within the context of wider local government sector reform and what this change of role might mean for the overall viability of smaller councils. We are concerned that this reform package is being undertaken largely isolated from the broader package of reforms, including local government and three waters.

While these changes are likely to create greater certainty and consistency for many in the system, it risks being unresponsive to local needs. Finding ways to provide for local-level issues will be vital. It is challenging enough for our communities to engage with planning processes, even when it is largely undertaken at the local level. We have already experience challenges resulting from national direction for providing appropriate local level decision-making in parts of our District. With the NPS-UD struggling to provide for appropriate local level decision making in Otaki. The barriers to meaningful participation in decision-making are likely to be higher (or at least perceived to be so) when plans are pitched at a regional level and decision making is undertaken by a regional committee where



few appointees are likely to be familiar with our local community context and issues. It is likely to be much harder for our communities to engage in the proposed system.

Maintaining the flexibility in the system for issues to be resolved at a scale that makes sense for that specific issue is core to an efficient and effective resource management system, while these reforms are largely proposing an escalation of most issues up to the regional level, opportunities still need to be available to reflect the local context and issues where this is important. Providing a clear way for communities to feed local issues and concerns into the system is going to be essential.

## 2 System alignment isn't going far enough

Creating certainty in the strategic direction set out in the NPF and RSS is both a positive and a negative. While certainty of direction is important, it still needs to be able to be responsive to changing circumstances. Providing adequate mechanisms for 'course correction' over the review period will be incredibly important. Making sure that those corrections are based in evidence gathered from the improved monitoring and reporting systems that are intended to underpin these reforms will also be vital. Likewise, the process to review and update the NBA plans needs to be responsive to new issues and changing circumstances.

What is less clear is how the infrastructure funding systems are also going to be synchronised with the planning timeframes. For regional spatial strategies to be effective they will need to link in with (or modify) existing funding processes so that they are logically sequenced and aligned.

There is a concern that the addition of the RSS under the SPA is an additional planning layer, which makes for a more complex system. Adding this extra layer may, in fact, create a system that takes longer to implement and has less flexibility and responsiveness. It appears this additional layer doesn't factor in alignment with the LTMA funding processes, and it is not clear how it will work with 3 Waters entities when these are created. With separate joint committees for RSS and NBA plans and an additional layer of decision-making the resource management system appears to be getting far more complex.

## 3 Funding and sector support

It is difficult to comment on the practical implications of the proposed system when there is little information available on the funding arrangements that will support it. It is our view that Central Government should provide implementation funding as part of adopting new national direction, including the implementation of the NPF. It may also be appropriate for RSS development to be primarily funded by central government with Council contributions, and with funding of initiatives to align with current/planned responsibilities, while the development of NBA plans would be appropriately funded at a local and regional level.

Investment in on-going training and professional development for the sector is critical to improving performance and outcomes. There is a shortage of resource management professionals and a lack of training and professional development opportunities to continue to support and grow the sector. If a significant shift in delivery to outcomes is sought then a corresponding shift to better investment in implementation of the new system is essential.

## 4 The role of Māori in resource management

The increased role of Māori in the resource management system is a positive change that has potential for significant benefits for both our iwi partners and the performance of the overall resource management system. However, the success of this change will be determined by the support given to iwi to develop the capacity to undertake the increased

role. Creating the structures for engagement and involvement is positive but risks not working as intended unless it is underpinned by adequate funding, and capacity and capability building support.

For specific comments on this section of the discussion document, we defer to the commentary provided by our iwi partners.

## 5 Some of these things are already possible

The issues identified with the resource management system are not news to those who have been working within it. Councils across the Wellington region have been working collaboratively at an operational level for years: developing shared plan content, submitting jointly on issues, and more recently creating a regional leadership committee who are responsible for the implementation of a regional spatial plan – the Wellington Regional Growth Framework (WRGF).

By working in this way, we have sought efficiency across the region, sharing skills and capacity where it makes sense to do so. We understand that a strong region that is working together creates benefits for all of us. However it is not an instant fix for all our issues, and there are challenges in particular in making sure that local issues are adequately understood and considered by the region. The new resource management framework is likely to face those same challenges.

We look forward to further opportunity to comment on the details of the reform proposal.

Yours sincerely



Wayne Maxwell  
**CHIEF EXECUTIVE**  
**Te Tumuaki Rangatira**