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New Zealand Institute of Landscape Architects

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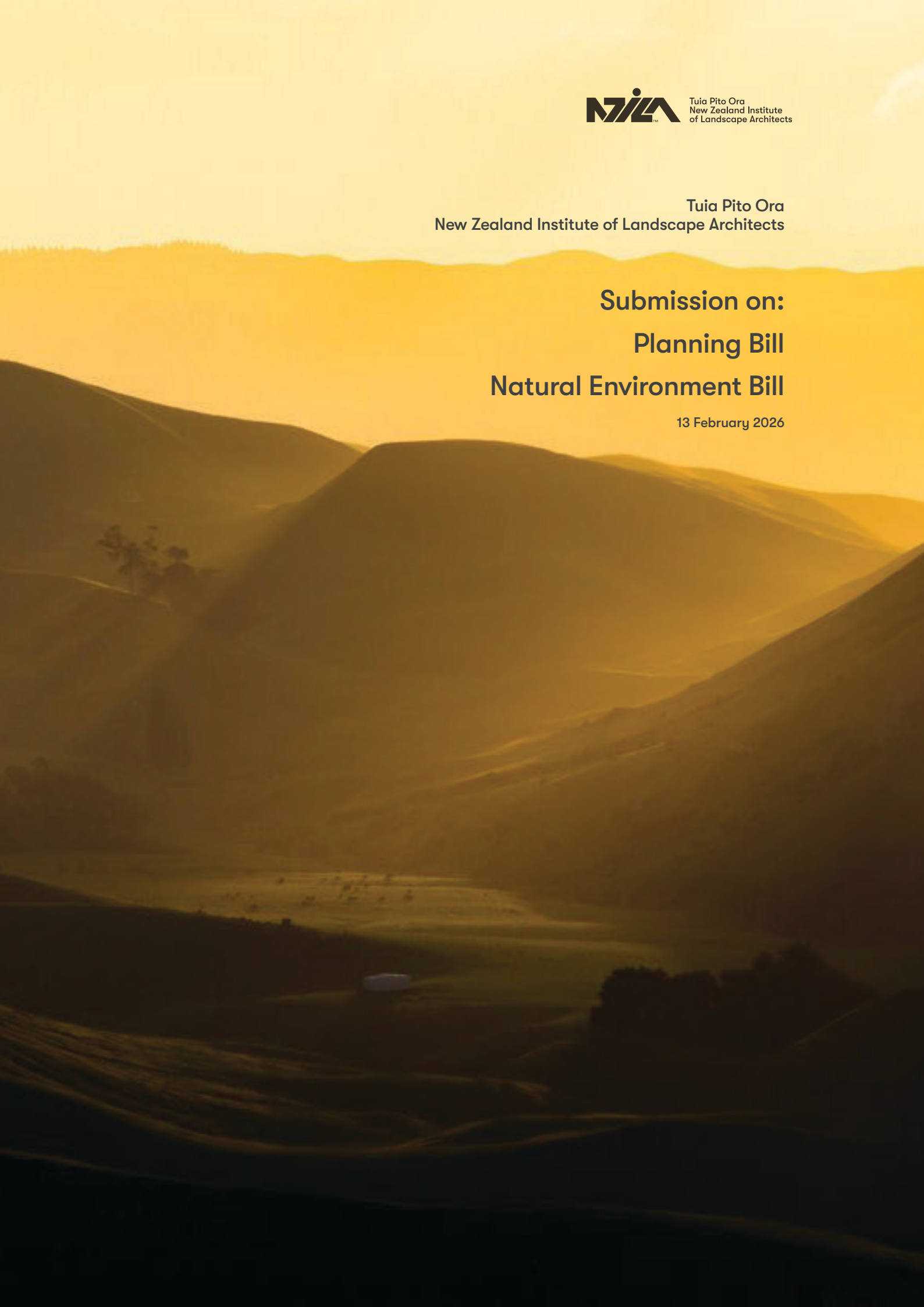
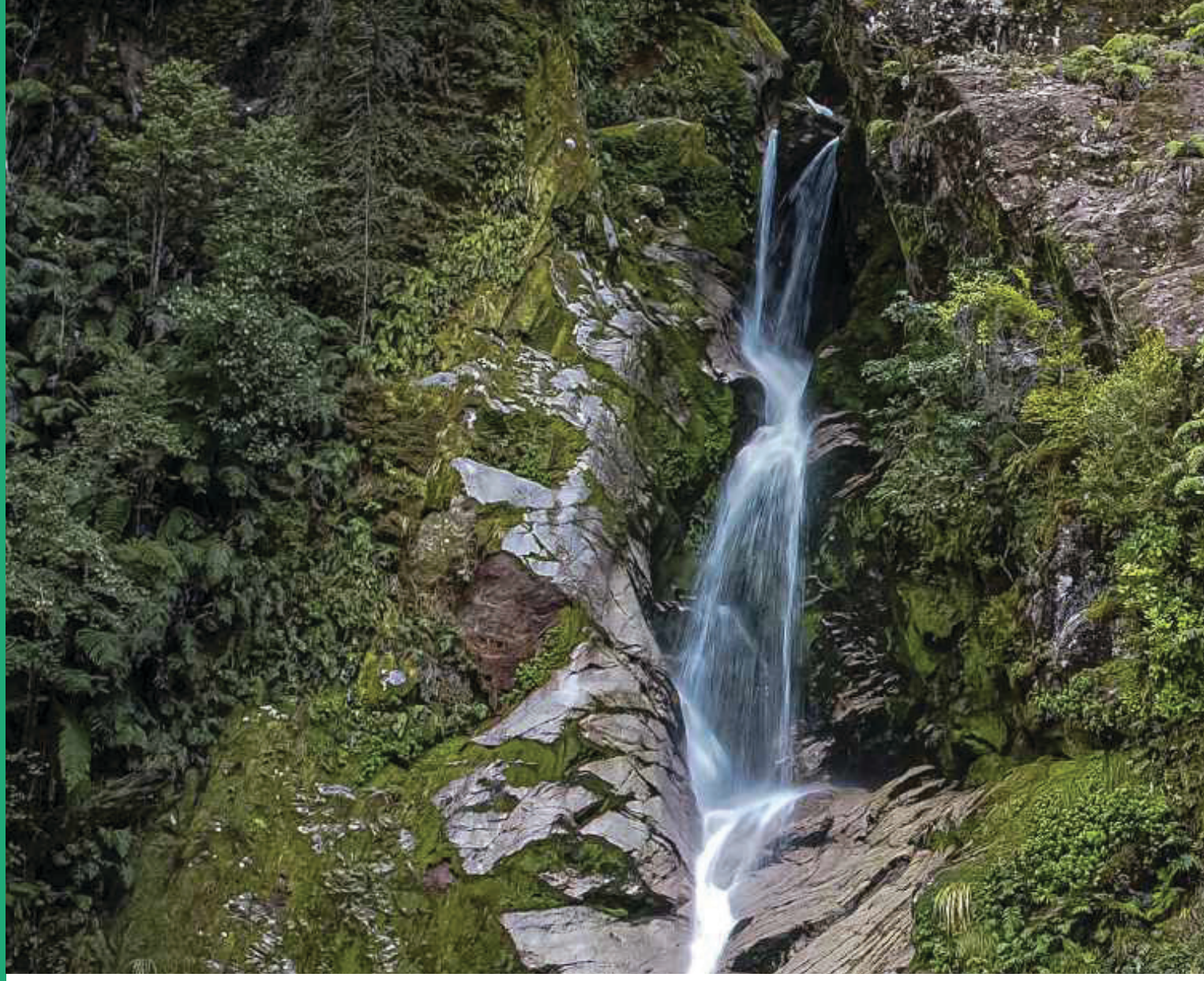
Submission on:
Planning Bill
Natural Environment Bill

13 February 2026





Dorothy Falls, West Coast
Image: Stephen Brown

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Prepared by:	NZILA Environmental Legislation Working Group
Approved by:	NZILA Board
Cover Image:	Hawke's Bay Rural Landscape (not an Outstanding Natural Landscape) Copyright Simon Cartwright Photography

Whatungarongaro te tangata, toitū te whenua

(As people disappear from sight, the land endures)

EXECUTIVE SUMMARY

ES1. Tuia Pito Ora New Zealand Institute of Landscape Architects (NZILA) is the internationally recognised professional body for landscape architecture in Aotearoa New Zealand. Our more than 700 members work daily at the intersection of natural systems, cultural relationships, built environments and community wellbeing, operating across urban, rural, coastal and natural settings. Because we engage with every tier of the planning system — working with and advising councils, central government agencies, iwi, developers, major infrastructure providers and decision makers — we hold a uniquely practical understanding of how environments actually function, how change accumulates, and what it takes for development to succeed without undermining environmental performance, identity or long term resilience.

ES2. Our submission is grounded in long standing professional assessment practice, in the nationally adopted document *Te Tangi a te Manu: Aotearoa New Zealand Landscape Assessment Guidelines*, and in extensive engagement across allied disciplines. Our profession is uniquely positioned to provide direct, day-to-day insight into the functioning of environments and the relationship between people, place and change. This experience allows us to identify where the Bills will support well-functioning environments and where critical refinements are needed to ensure the system performs as intended. We use the term well-functioning environments because this better reflects how places operate as integrated systems, and provides a clearer and more accurate framing than the Planning Bill's current reference to just urban and rural areas.

ES3. This submission has been informed through a national hui and collaborative workshops with allied professional bodies (including Ngā Aho, NZPI, UDIA, RMLA and others) to ensure multidisciplinary alignment across planning, design and environmental practice in Aotearoa.

ES4. By our reckoning, the Aotearoa New Zealand landscape is a $100 billion driver of national economic performance and future prosperity (refer to Page 16 for context). It underpins the nation's international reputation for naturalness and provenance, supporting major export earning sectors including primary industries, international tourism and the screen production economy. Understanding and respecting our landscape values is critical to support effective long term planning that create well-functioning environments.

ES5. The Planning Bill and the Natural Environment Bill are an important opportunity to reshape the planning system of Aotearoa New Zealand.

Many elements are strongly aligned with contemporary practice: strengthened national direction, regional spatial planning, clearer pathways for tāngata whenua involvement, and greater potential for consistent, integrated decision making. These changes have the potential to create a more predictable, efficient and coherent system that reduces duplication and provides clearer expectations for communities, councils and investors.

ES6. However, in their current form, the Bills contain structural issues that will limit their effectiveness. The Bills establish goals for well-functioning areas, yet remove the information needed to assess whether these areas – or environments as we prefer to understand them – can be delivered, because they:

- rely on spatial planning to provide clarity and direction, yet do not require the region-wide evidence base that spatial planning depends on;
- seek integration between land use and environmental planning, yet apply different concepts, scales and definitions across the two Bills;
- simplify processes but remove participation at the very point where proposals diverge from what spatial plans anticipate; and
- introduce regulatory relief mechanisms that work against accurate identification of the very systems the legislation is intended to protect.

ES7. We know from professional experience that well-functioning environments depend on coherent relationships between natural processes, built form, cultural connections, public realm qualities, legibility and lived experience. These elements together shape identity, hazard exposure, ecological performance, settlement form, movement patterns and development feasibility. Nature-based systems form an essential part of this structure and operate as core infrastructure that supports resilience, climate adaptation and long-term cost efficiency. Excluding evidence about character, coherence, landscape relationships, visual qualities, exterior building layout and everyday well-being prevents decision makers from understanding how a place functions, whether development aligns with spatial planning outcomes, and whether people can reasonably use and enjoy their land. Without this, we are concerned that cumulative drift will occur, spatial plans will lose credibility, and communities will lose confidence in the planning system.

ES8. Similarly, without a region wide place-based evidence base, plans at different tiers will rely on different assumptions about how environments work. This will lead to inconsistent application of limits and outcomes, repeated disputes, and loss of the efficiency the Bills seek to achieve. A shared evidence base is essential to ensuring integrated decisions, reducing re-litigation, and providing clear and predictable expectations. Without this shared foundation, different parts of the system will work from different assumptions, undermining both efficiency and public confidence.

ES9. A further structural issue is the misalignment between the Bills. One frames goals around "well-functioning urban and rural areas"; the other frames goals around environmental limits and outcomes. These framings do not align with how environments actually function, nor with the integrated systems approach long accepted in professional practice. Shared definitions of urban, rural, coastal and natural environments (that include the nature-based and people-based systems within, between and across them), and aligned criteria for well-functioning environments, would provide a more accurate and operational foundation for both Bills.

ES10. Additionally, the Bills also need to clearly acknowledge that enhancement, not just protection, is essential to environmental functioning. Much of the environment of Aotearoa New Zealand is already degraded, and the purpose of the system cannot be achieved without active improvement over time. Enhancement should therefore be an explicit goal in the Natural Environment Bill and clearly reflected in related policy direction.

ES11. Finally, a plan-led system requires efficient pathways for proposals that align with spatial plans, and proportionate opportunities for participation where proposals materially depart from those expectations. This ensures transparency, protects local knowledge, fosters community confidence and reduces long term risk. Without these pathways, plan departures will generate avoidable conflict and undermine trust in the new system. The Bills should provide for this directly.

ES12. With targeted refinements, the Bills can achieve their intent and create a planning system that is efficient, predictable and capable of delivering high quality outcomes over time. The specific outcomes we seek, drawn directly from the detailed analysis and considerations set out in our full submission, are as follows:

ES13. Planning Bill (refer to Part 4, page 48 for full details)

- Clause 4: Insert clear definitions of environments, well-functioning environments, nature-based systems and place-based evidence, ensuring consistent use across the system.
- Clause 11: Amend the goal to refer to well-functioning environments (rather than areas, including within, between and across urban, rural, coastal and natural settings) and enable nationally consistent criteria that describe the functional qualities of well-functioning environments.
- Clause 13: Introduce a proportional participation pathway where proposals materially depart from what the spatial or combined plan anticipates.
- Clause 14: Delete subsections 14(1)(e), (g) and (h) to restore the ability to consider physical, cultural and experiential qualities essential to environmental functioning. Also refine 14(1)(a) to exclude only matters referring to internal layout and on-site amenity.
- Clause 27 and Schedule 2: Require preparation of a single region-wide place-based evidence base that integrates natural systems, cultural relationships, settlement form and lived experience, and must be used consistently across spatial planning, combined plans and consenting.
- Clauses 27 and 28: Require nature-based systems to be identified, mapped and treated as core infrastructure, and require sequencing of development around these systems.
- Clauses 54, 59, 67, 75, Schedule 2 and Schedule 3: Consequential changes to reflect our recommended change from rural and urban areas to include urban, rural, coastal and natural environments.
- Regulatory Relief: Remove the regulatory relief framework or, at minimum, ensure it cannot override or weaken the region-wide evidence base or mapped natural and cultural values.

ES14. Natural Environment Bill (refer to Part 5, page 59 for full details):

- Clause 11: Add an explicit goal for net gain in indigenous biodiversity and enhancement of natural character and ecosystem function.
- Alignment requirements: Require natural environment plans to use the same region-wide place-based evidence base and functional environmental systems used in spatial planning.
- Limits and management units: Require environmental limits to align with mapped functional environmental systems.
- Indicators: Introduce a concise national indicator suite for tracking cumulative change and require consistent use across regional planning.
- Regulatory Relief: Remove all references to regulatory relief to maintain the integrity of environmental limits, evidence based identification and natural environment plans.

ES15. Together these changes will create a system with a clear line of sight from national goals to spatial planning, plan rules and on-the-ground decisions. They will strengthen efficiency, reduce uncertainty, support infrastructure delivery, protect environmental values, and ensure development contributes positively to the long term health, resilience and identity of the places where New Zealanders live, work and gather.

ES16. We would like to be heard in support of our submission. Our concerns particularly relate to ensuring integration of the natural and built environments which is fundamental to well-functioning environments. In this regard, we also offer our collective services to assist with the refinement of the Bills, the definitions, and in drafting national directions.

Christchurch Avon River
Landscape-led Spatial Planning
Image: Bayleys Real Estate

CONTENTS

PART 1: CONTEXT

Introduction

1. Tuia Pito Ora New Zealand Institute of Landscape Architects (NZILA) is the internationally recognised professional body representing more than 700 landscape architects across Aotearoa New Zealand. For over fifty years, we have supported high professional standards through our Registration programme, Continuing Professional Development system, Academic Accreditation processes, and Code of Conduct.

2. Our members work across public, private, and iwi/hapū sectors, shaping policy, spatial planning, plan development, consenting, design, assessment, implementation, and environmental management. Their work spans natural, urban, rural and coastal environments, including public places, infrastructure, water and energy projects, ecological restoration, landscape management, and developments within sensitive landscapes such as Outstanding Natural Features and Landscapes, across a wide range of scales.

3. This submission reflects the Institute's collective professional judgement formed through practical experience across these settings, and through our leadership in developing and applying robust landscape assessment methods. In particular, *Te Tangi a te Manu: Aotearoa New Zealand Landscape Assessment Guidelines* — conceived, developed, and published by NZILA — is now widely recognised by councils and the Environment Court as a consistent, transparent and evidence based framework for assessing landscape character, values, and effects (we provide more detail on the guidelines in the next section).

4. To inform this submission, we convened a national hui in Wellington, which included a presentation from and interactive session with the Parliamentary Under Secretary for Resource Management Reform, Honourable Simon Court MP. The hui also included a series of collaboration sessions with other allied professional bodies — including the New Zealand Planning Institute (NZPI), the Urban Designers Institute Aotearoa (UDIA), and the Resource Management Law Association (RMLA) — to ensure alignment where appropriate and to reflect the multidisciplinary nature of planning, environmental management, and development in Aotearoa. We continue to work with these bodies to share and develop professional thinking.

5. Following our in-person hui, we ran a series of online sessions to test and refine key issues with the wider membership. This process informed the development of the framework for our submission, and to provide clarity on the specific outcomes that are needed.

6. The submission itself has been written by a Registered Fellow of NZILA who was supported by a specialist working group of 19 members.

7. Collectively, these inputs ensure that our submission is grounded in both professional practice and broad, sector-wide engagement, and reflects the perspectives of those who work daily at the interface of people, place, and the natural environment.

Te Tangi a te Manu

8. *Te Tangi a te Manu: Aotearoa New Zealand Landscape Assessment Guidelines* is the nationally developed landscape assessment framework created by the New Zealand Institute of Landscape Architects and published in 2022. It was written after an extensive period of professional collaboration, peer review and engagement across our profession. *Te Tangi a te Manu* was designed to replace fragmented and inconsistent approaches with a single shared approach that strengthens objectivity, transparency and consistency in landscape evidence used in planning and environmental decision making.

9. It reflects that Aotearoa New Zealand's landscapes are unique in their combination of natural systems, cultural relationships and lived experience. It builds on the globally recognised definition of landscape: the relationship between people and place, expressed through the interplay of physical form, cultural meaning and human perception. But additionally, the guidelines recognise the country's bicultural foundations by treating cultural relationships to whenua (land) as integral to understanding how Aotearoa New Zealand landscapes function, how they are valued, and how change affects both communities, hapū and whānau, and environmental quality.

10. T*e Tangi a te manu* provides a framework for integrating these bicultural foundations using kōrero tuku iho (intergenerational knowledge transmission), whakapapa (genealogy and layers of association) and hikoi (experiencing and perceiving landscape). These three concepts intersect to form an understanding of whenua (land)

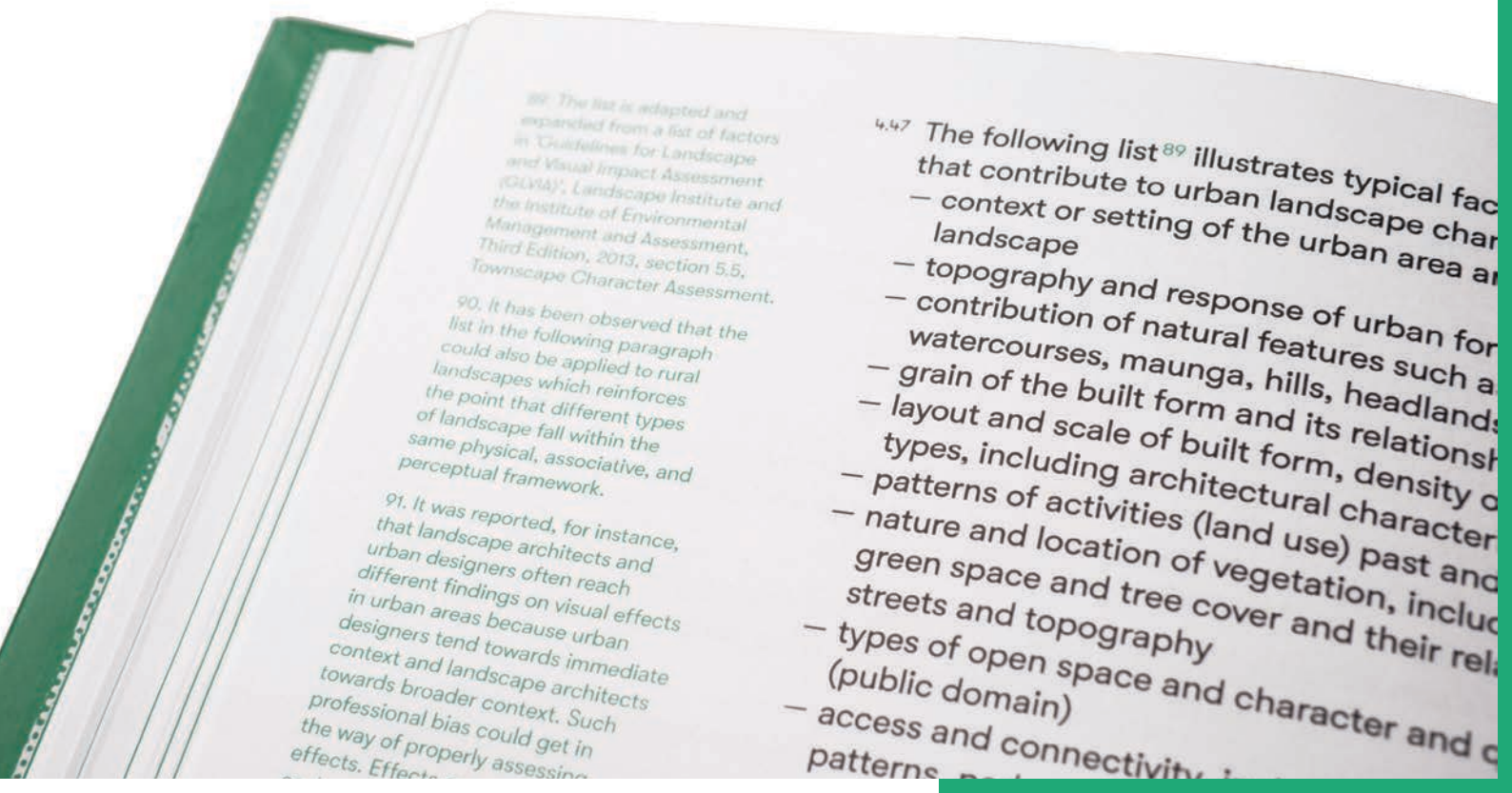
Landscapes communicate through patterns: People recognise when a landscape is healthy: clear water, intact vegetation, a coherent landform, familiar seasonal rhythms, and visible cultural markers. When those patterns fray, the relationship between people and place weakens. You don't need specialist language to sense when a place is thriving — or slipping.

which the landscape sits within. Crucially, *Te Tangi a te Manu* provides concepts and processes specifically tailored within the context of New Zealand. It offers practical guidance on landscape characterisation, identification of landscape values, assessment of cumulative change, and the professional responsibilities required to support clear, defensible and place appropriate planning outcomes. It enables councils, practitioners and decision makers to work from a common set of definitions and principles, reducing ambiguity and improving the quality of decisions (refer to Case Study 11 in Appendix B).

11. Te *Tangi a te Manu* has been widely appreciated by allied professionals, the Environment Court and Fast Track panels. Much of our submission is grounded in the concepts, methods and professional experience captured in *Te Tangi a te Manu*. It acts as decision-support infrastructure, enabling proportionate, effects-based judgement in support of the objectives of both Bills.

Te Tangi a te Manu is publicly accessible online at https://nzila.co.nz/media/uploads/2022_09/Te_Tangi_a_te_Manu_Version_01_2022_.pdf

A published hard-back copy can be provided on request.



Why Landscape Matters to Aotearoa New Zealand

12. Aotearoa New Zealand is recognised globally for the distinctive character and diversity of its landscapes, and for the strong relationship between people, place and identity. Our national reputation is tied to our natural systems, settlement patterns and the way communities inhabit and care for their environments. This includes the unique culture and relationship of tangata whenua associated with specific places. Landscape provides the integrating lens through which social, economic, cultural and environmental dimensions of change are understood, and is central to how both individuals and communities experience the effects of development.

13. How all New Zealanders relate to landscape is also uniquely shaped by the deep and enduring connections hapū and whānau hold with whenua (land) and moana (sea), strengthened by intergenerational knowledge, responsibility and continuity that remain evident across our country. Our bicultural heritage is reflected in place names, landmarks, wayfinding, stories and everyday activities that anchor people to their surroundings and reinforce the long standing bond between communities and the landscapes they inhabit.

14. These landscapes give rise to values that define us — connection to place, environmental stewardship, and a sense of belonging — and these values are shaped not only by iconic vistas but also by the everyday environments where people live, work and gather. Such everyday places contribute directly to how visitors and residents experience New Zealand, and mean that landscape quality has social, cultural and economic benefits, and is not just an environmental construct.

15. Landscape provides the integrating lens through which social, economic, cultural and environmental effects are understood. It is how change is experienced by individuals and communities, and therefore how the outcomes of development are most meaningfully assessed. Experience under the Resource Management Act showed that when landscape considerations were inconsistently understood or applied, planning processes struggled to manage the full consequences of change. The new system provides an opportunity to correct this longstanding weakness.

16. The international brand of Aotearoa New Zealand is built on a mosaic of interconnected landscapes: alpine environments, rural heartlands, productive plains, braided rivers, volcanic plateaux, coastal settlements, small towns and urban–nature edges. Organisations, industries and businesses consistently draw on these landscapes

Ordinary routes shape belonging: Belonging grows from ordinary moments: a sheltered bus stop, a safe shortcut to school, glimpses to a familiar hill, a bench where neighbours talk. When these everyday cues decline, identity and legibility decline with them, long before anyone notices a rule has changed.

to convey trust, quality and authenticity to both domestic and international markets. These places support both cultural identity and major sectors of the national economy: Tourism New Zealand's global consumer research shows that landscapes and natural scenery are the top reason people choose to visit New Zealand, making them core to our international brand and a consistently top-ranking driver of visitor demand .

17. By our reckoning, the New Zealand landscape is a **$100 billion driver** of national economic performance:

    - International tourism generated approximately $12.1 billion in visitor spend in 2024/25, with the wider tourism industry worth around $51 billion per year.
    - The screen sector contributes $3.3–$4 billion annually , with film related imagery strongly influencing visitor behaviour; in 2019, about one third of visitors went to at least one film location and nearly one fifth cited film as a reason for their interest .
    - Food and fibre exports (the biological economy) totals nearly $60 billion annually , with producers relying heavily on landscape based imagery to communicate naturalness, provenance and environmental quality.

18. These figures show that the landscapes of Aotearoa New Zealand, ordinary as well as exceptional, are fundamental to national identity, export performance and global reputation. Landscape is not just part of our story: it is the source of who we are, the backbone of several of our largest industries, and the foundation of the value we project to the world (refer to Case Study 1, Appendix B). This deep relationship people have with the landscapes of Aotearoa New Zealand indicates that cultural, historic and lived values go well beyond just "scenery". Understanding and respecting such values is critical to support effective long term planning of our environment.

A June 2025 analysis of Tourism New Zealand's Active Considerer Monitor shows that 52% of "Active Considerers" are motivated by New Zealand's landscapes and natural scenery, making it one of the strongest pull factors for travel to NZ. Source Tourism NZ.

Verified by MBIE International Visitor Survey data showing international visitors spent $12.1 billion in the 12 months to June 2025.

IBISWorld's 2025–26 Tourism Industry Report identifies industry revenue at $51.0 billion.

MBIE's Economic Trends in the Screen Sector and NZ Film Commission briefings confirm screen sector revenue of $3.3 billion.

NZ On Air / Film Commission / Te Māngai Pāho research reports $2.7 billion in tourism expenditure linked to screen content and 15.9% of visitors citing screen influence.

Latest SOPI report forecasts $59.9 billion in food and fibre exports for the year ending June 2025.

Hobsonville Point
A well-functioning urban environment
Image: Winton

Well-Functioning Environments

19. Well-functioning environments underpin affordable housing, efficient infrastructure delivery and productive local economies, alongside environmental quality and community wellbeing. Many environments are not currently well-functioning, and the planning system must support enhancement and improvement over time, not only the prevention of further decline (refer to Case Study 6, Appendix B).

20. Environments in Aotearoa New Zealand are more than the physical settings in which activities occur. They are living systems shaped by the interaction of natural processes, built form, cultural relationships and human experience. Environments — and by extension, landscapes — comprise physical, associative and perceptual dimensions that together influence how places function, how they are valued, and how they change over time. This includes the long standing intergenerational relationships that communities, and particularly hapū and whānau, hold with land and water.

21. A well-functioning environment therefore cannot be understood solely as a mapped area or zone; it must be understood as a holistic system whose performance depends on the coherence of its elements and the quality of the relationships between them. In this sense, environments are not defined by mapped boundaries, but they can be represented spatially for planning requirements once their functional relationships are understood. These relationships include both built and natural components, as well as nature-based systems — such as wetlands, riparian networks and coastal processes — that underpin environmental resilience (critical to managing effects of climate change).

22. Within this broader understanding, Aotearoa New Zealand's environment can be described across four interrelated settings: urban, rural, coastal and natural. With these are nature-based and people-based systems that overlap and interact within each other, together forming the places in which people live, work, grow or collect food, move, gather, and connect to.

23. Each setting has its own structures, pressures and patterns of change, but all are shaped by the same underlying relationships between people, nature and land, and all contribute to the identity, wellbeing and ultimately to the strength of communities (including hapū and whānau). Natural environments are particularly unique, because they can be standalone, but are also present within, across and between the other three settings.

24. Recognising these four settings (urban, rural, coastal and natural) as environments reflects how New Zealanders experience their surroundings and provides a more accurate conceptual basis for understanding how environments work.

25. Although their characteristics differ, well-functioning environments share several core qualities in that they:

    - operate as integrated systems, with natural processes, built form and nature-based systems functioning together rather than in isolation;
    - promote human well-being;
    - are legible and coherent, enabling people to understand and navigate their surroundings and maintain a sense of place;
    - support healthy ecological and social functioning, ensuring that air, water, soil, ecosystems and cultural relationships are sustained over time;
    - provide appropriate opportunities for use and development, tailored to their context and compatible with long term environmental and community wellbeing; and
    - are resilient, adapting to natural hazards, climate pressures and cumulative change.

26. These shared attributes manifest differently across the four settings:

    - Urban environments are typically characterised by the concentration of people, built form, transport networks and public spaces that together support accessibility, economic activity, daily life and tourism, while relying on integrated nature-based systems to manage water, climate and urban resilience.
    - Rural environments typically combine productive land uses, rural character, open landscapes and the natural systems that underpin agriculture, horticulture, forestry and energy economies, alongside rural settlement, recreation and tourism.
    - Coastal environments are shaped by dynamic land–sea interactions, natural character, public access and longstanding cultural relationships with the coast that define us as an island nation.
    - Natural environments are broadly defined by ecological processes, biodiversity, hydrology, landforms and the life supporting capacity of natural systems, including the nature-

Function, Interpretation and Connection:
Well-functioning environments are understood as a whole. People interpret coherence in how landform, water, vegetation, access and culture connect. When flows are blocked, patterns disrupted or long used pathways severed, places feel less resilient — not just technically, but in the way people navigate and experience them.

based systems that absorb, filter and regulate environmental change. As noted, natural environments can be standalone, but are also present within, between and across urban, rural and coastal settings.

27. While the urban environment includes the places where people live, work and gather, it is not synonymous with the built environment. The built environment refers specifically to human-made physical structures — buildings, transport networks, infrastructure, streets, public spaces and other constructed elements that shape daily activity, typically defined by a physical boundary. Urban environments, by contrast, encompass not only these built components but also the natural systems, cultural relationships, social dynamics and experiential qualities that influence how cities and towns function. This distinction matters because well-functioning environments cannot be understood purely as collections of structures; they are systems of physical, associative and perceptual relationships that extend beyond what is built.

28. Whilst areas of New Zealand can be easily considered as our natural environment, it's important to distinguish that natural systems and processes operate through, and connect urban, rural and coastal environments. These must be integrated across all settings to achieve well-functioning environments.

29. Understanding environments in this broader sense also highlights the importance of distinguishing between an environment and an area. An area is primarily a spatial unit or administrative boundary. An environment, by contrast, is a system of relationships — physical, cultural and experiential — that operate across and beyond mapped lines. The concept of environment therefore provides a more accurate and holistic foundation for understanding how places function, how cumulative effects occur, and how people relate to the places in which they live. Using the concept of environment enables integrated thinking and avoids treating natural systems, cultural connections and settlement patterns as separate or siloed components. Such environments can still be mapped.

30. This conceptual framing — grounded in integrated systems, four interacting settings, and the holistic understanding of environment reflected in contemporary, professional practice (and captured in *Te Tangi a te Manu*) — provides the basis for describing what it means for environments in Aotearoa New Zealand to be well-functioning. It underpins the definitions and criteria set out in Appendix A, and informs the way we understand the structure, performance and long term health of the places that communities depend on.

The Importance of Clear Expectations

31. In our professional experience, most development in Aotearoa New Zealand is undertaken by individual developers working on single projects rather than by large integrated entities shaping whole communities. This means that the quality of our environment emerges through the accumulation of many discrete, project-by-project decisions. Each decision is influenced by the expectations, incentives and requirements that apply at that moment. Over time, these decisions compound, determining whether environments become more coherent, resilient and functional, or whether they gradually fragment and decline.

32. Well-functioning environments therefore depend on clear rules, simple expectations and consistent baselines. When the standards that guide development are unambiguous, developers can design with confidence, councils can assess with clarity, and communities can understand how change will occur. We set these principles out in *Te Tangi a te Manu*, emphasising the importance of structured, transparent and repeatable approaches for understanding how environments function and how cumulative change occurs. Clear baselines and effective engagement and collaboration at each level support the coherence of natural systems, cultural relationships and built form, reducing the risk that incremental decisions will undermine long term outcomes.

33. A level playing field is essential. Our professional experience shows there are developers — including government agencies — who genuinely seek to deliver high quality outcomes: integrated open space networks, nature-based systems for water and climate adaptation, well designed public spaces and buildings, and coherent neighbourhood structure (refer to Case Studies 2, 3 & 4, Appendix B). Clear and consistent baselines prevent a race to the bottom and ensure that development quality remains predictable and efficient across all projects. Without consistent expectations, short term market pressures reward the absence of investment in environmental and community wellbeing rather than its presence.

34. Our experience also shows that relying solely on goodwill, discretion or voluntary standards is insufficient to sustain well-functioning environments over time. Without firm baselines that apply evenly, the actions of those who choose not to invest in long term quality can shape entire communities and lead to future social-issues, often in ways that are difficult and more expensive to reverse (refer to Case Study 6, Appendix B).

35. Where expectations are unclear, inconsistent or fragmented, long term environmental quality and community outcomes can drift. This kind of incremental drift can weaken ecological systems, erode cultural and experiential qualities, and diminish the sense of coherence and identity that supports community wellbeing. Over time, this drift affects liveability, resilience and ultimately the ability to secure well-functioning environments.

36. For these reasons, clear and consistent baselines are fundamental to achieving well-functioning environments. They support fair competition between developers, give certainty to decision makers and communities, and ensure that high quality outcomes are not the exception but the norm. Strong baselines provide the foundation for individual projects — each a small part of a much larger, interconnected system — to contribute positively to the long-term health, resilience and identity of the environments in which New Zealanders live.

37. These principles reinforce the need for a well considered and coherent framework that guides how development decisions are made. When expectations are aligned, and when the attributes of well-functioning environments are consistently understood and applied, individual decisions contribute to collective outcomes, and the long term goals of planning — supporting healthy communities (including hapū and whānau), resilient environments and clear, predictable pathways for change — can be realised. Without such a framework, the cumulative performance of environments is left to chance, rather than shaped through intentional, integrated and enduring practice.

Auranga Estate, Auckland
Image: Auranga

Process, Participation and Place-based Understanding

38. Fairness and natural justice are essential to a planning system that communities can understand and trust. Our collective experience shows that predictable processes, transparent reasoning and proportionate opportunities to participate are central to good quality decision making. These principles reflect how people relate to their environments in Aotearoa New Zealand: through the interplay of physical form, cultural meaning and lived experience. When planning processes acknowledge the relationship people have with the environment around them, development outcomes are more balanced, coherent and durable, often meaning they are more palatable to the communities that will live with them.

39. Where proposals align with what plans clearly anticipate, processes should be efficient. Clear expectations allow applicants to design appropriately, councils to assess consistently and communities to anticipate and understand how change will occur. Efficient pathways for plan aligned proposals are only credible when plans themselves rest on integrated, place-based evidence. When baselines accurately reflect the functioning of natural systems, cultural relationships and neighbourhood structure, streamlined assessment is fair and appropriate.

40. In situations where proposals do not align with planned expectations, a different process is required. People affected by unanticipated or greater than expected impacts should have a fair and proportionate opportunity to be heard and participate through effective engagement and collaboration. Our experience shows that restricting participation in these circumstances produces predictable consequences: conflict, weaker design responses, and reduced trust in the planning system. Conversely, engaging communities and partnering with hapū and whānau early when proposals depart from expectations consistently improves outcomes, reducing downstream risk and strengthening environmental and social performance.

41. While it is sometimes assumed that local voices simply oppose change, our experience shows that communities often contribute constructive and practical insights that improve development outcomes. They hold essential knowledge about the places in which they live. Knowledge of values, hazards, identity, patterns of use and cultural associations that cannot be replicated through technical assessment alone. A planning system maintains legitimacy when

People see patterns that plans miss:
Locals know which gullies flood after a storm, which routes children actually use, where winter ice lingers, and which corners feel unsafe. These lived insights reveal how places truly work day to day — saving money, preventing mistakes, and producing development that fits rather than fights its setting.

people can understand decisions and see their environment specific knowledge reflected in outcomes that materially affect them. This leads to community buy-in and acceptance much more quickly than ignoring what they consider are legitimate concerns.

42. This community knowledge is also part of the place-based evidence that any planning system relies on to function well. Removing participation at the point where development diverges from signalled expectations undermines both fairness and the integrated, place-based approach needed to sustain well-functioning environments.

43. Upholding natural justice in this manner is not a barrier to development but a precondition for high-quality, enduring results. Efficient processes for proposals that fit within clear baseline expectations, and proportionate participation where proposals exceed them, together provide clarity for applicants, confidence for communities and integrity for the system as a whole. This balanced approach aligns with contemporary professional practice and supports environments that function well over time.

44. Alongside these principles of fairness and participation, any planning system also relies on clear, credible information about how environments function in practice. Effects based information (such as landscape, visual, cultural, and experiential understanding) helps decision makers interpret how people experience place and how proposed changes interact with their physical, social, and cultural context. This information sits alongside community knowledge and technical evidence as part of the integrated, place-based understanding that underpins sound planning practice. System reforms that aim to improve efficiency, predictability, and alignment depend on this shared understanding of place being both accurate and accessible.

45. In a strengthened and streamlined planning system, such information becomes easier to apply, not harder. A well designed system provides the process and effects based information provides the substance. Together, they support planning decisions that are comprehensible, trusted, and grounded in how environments actually work. Maintaining this relationship between system design and the information used within it is fundamental for achieving outcomes that reflect both the evidence about an environment and the lived realities of the communities (include hapū and whānau) who inhabit it.

Pūriri Park Road, Whāngarei
Image: Architectus

PART 2 — OUR OBSERVATIONS OF THE BILLS

What NZILA Supports

46. Based on our experience, the general direction and several elements of the Planning Bill and Natural Environment Bill will establish a more coherent foundation for planning. Many of these elements align with contemporary professional practice and with the integrated, place-based understanding of environments that we outlined in Part 1.

47. Before turning to our observations about where refinements are needed, we highlight the features of the Bills that, if implemented well, will materially support a clearer and better aligned system:

- **A clearer framework established at national and regional levels**
  The move toward strengthening national direction and establishing regional spatial plans provides a valuable opportunity to reduce fragmentation, create clearer expectations and align the provision of infrastructure to support areas of growth. When these expectations are set early and consistently, individual decisions are more likely to support the long term functioning of environments and give effect to cumulative outcomes intentionally rather than through uncoordinated, project by project change.

- **Greater consistency in how environments are understood and managed**
  Clarity in definitions, terminology and evidential expectations provides the basis for predictable and transparent decision making. Consistency also sits comfortably alongside local judgement; it establishes a shared language through which practitioners and decision makers can understand context, interpret change and compare alternatives. This is particularly important in Aotearoa New Zealand, where environments are shaped by interconnected physical, cultural and experiential dimensions. Ensuring that national consistency remains grounded in how environments function — including their cumulative patterns, system relationships and everyday lived qualities — will support coherent outcomes across regions.

- **Considered pathways for tāngata whenua perspectives within strategic planning**
  The Bills introduce clearer pathways for Māori participation in the development of national instruments and regional spatial plans. In our experience, incorporating tāngata whenua perspectives (i.e. local knowledge) at these strategic stages supports a more consistent understanding of cultural values, relationships and environmental patterns that influence how environments function. When tāngata whenua (particularly hapū and whānau) input is genuinely reflected in the evidence base and in early spatial choices, it contributes to durable, place-based outcomes that align with our unique environments.

- **A more coherent approach to place-based evidence**
  Preparing place-based evidence and applying it consistently across spatial planning, land use planning and consenting is a practical and efficient improvement. A single, region-wide evidence base strengthens transparency, avoids conflicting assumptions and supports decision making grounded in how environments actually work. When this evidence reflects the integrated physical, cultural and experiential dimensions of place — including functional systems, patterns of use, cumulative change and local identity — it provides a coherent foundation for the increasingly detailed decisions that follow through the planning "funnel".

- **Retention of key environmental protections**
  The continued protection of high natural character areas, wetlands, lakes and rivers and their margins, outstanding natural features and landscapes, and significant heritage remains a critical component of a system aiming to achieve well-functioning environments. These protections are an important starting point for environmental resilience, community identity and long term well-being. Their effectiveness, however, depends on maintaining the information and processes needed to identify such values accurately and apply them consistently. In addition, measures to consider and manage everyday landscapes and environments are equally important to achieving the goals of both Bills.

When rules pull in different directions:
If one instrument treats a river corridor as a hazard pathway while another treats it as development land, that signals a clash. Projects stall or over correct, communities question fairness, and faith in the system fades — leading to more disputes, appeals and disengagement.

- **Standardisation that improves fairness and legibility**
  National standards, consistent mapping approaches and shared data structures can improve the legibility and predictability of the system, supporting fairer and more efficient planning processes. Standardisation works best when it clarifies process and establishes a reliable framework, while still allowing environments to be understood in their full context — including their character, identity, system relationships and the everyday qualities that communities depend on. Ensuring that standardisation supports, rather than narrows, the information required to understand how environments function will help maintain coherence across all stages of the system.

48. Taken together, these positive directions point toward a planning system that is clearer, more predictable and more efficient. However, their success requires a legal framework based on a foundation and understanding of place, natural processes and cumulative change, and on the Bills maintaining internal coherence as these elements are implemented. With this in mind, we now turn to several structural issues that require refinement for the system to function as intended.

Northcote, Auckland
Images: Isthmus Group

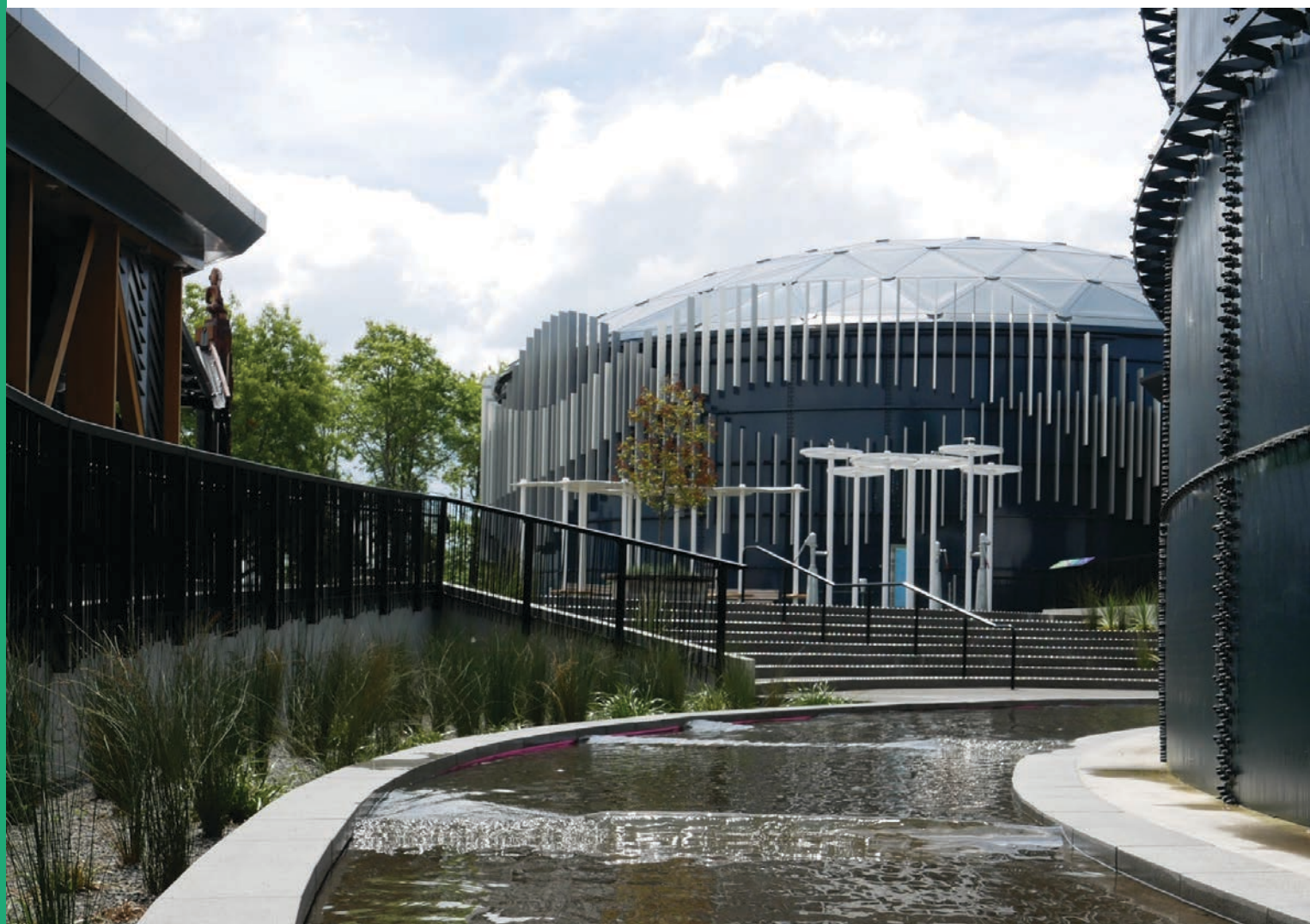
Internal Contradictions Between Goals and Methods

49. There is a fundamental disconnect between the outcomes the Bills seek and the methods they provide to achieve them. As we outlined earlier, our experience shows that well-functioning places operate across urban, rural, coastal and natural settings, understood as integrated environments of physical structure, cultural relationships, everyday use and interpretation.

50. The Planning Bill, however, frames outcomes in terms of well-functioning urban and rural areas. This is a narrower construct than the way places actually function in practice. Well-functioning places emerge from environmental systems — urban, rural, coastal and natural — shaped by physical structure, cultural relationships and lived experience. This mismatch in framing contributes to the internal contradictions within the Bills.

51. Clause 14 removes several domains of effects that are essential to understanding how environments (or areas) function in practice.

Waiaroha Water Discovery Centre, Hastings
Image: Wayfinder



Excluding matters such as landscape, local character, visual qualities, neighbourhood fit and everyday amenity removes key associative and perceptual information. These attributes are not arbitrary matters of personal taste but are rooted in the physical and experiential qualities of environments that can be evaluated using established methods; they describe how people experience change and how places operate as coherent, legible and resilient systems over time. Removing these dimensions weakens the ability to evaluate whether a proposal will maintain the qualities that support environmental performance (including built environments) and community wellbeing (refer to Case Studies 9 & 10, Appendix B).

52. This is particularly problematic for spatial planning. Spatial plans must integrate natural systems, hazard considerations, infrastructure sequencing, settlement form, cultural landscapes and public space structure. These elements only work together when they are understood within the broader environmental context described earlier. Excluding the evidence needed to interpret identity, coherence, cumulative change and lived experience undermines the ability to test whether development aligns with the strategic direction of the spatial plan or constitutes a material departure from anticipated outcomes. These elements only work together when they are understood within the broader environmental context described earlier, including the patterns and relationships that determine how places function over time.

53. This does not expand assessments back toward broad, discretionary RMA style testing. The new system already narrows decision making through national direction, standardised provisions and spatial planning. Rather, the contradiction lies in removing the limited but essential information required to understand whether outcomes for an environment — or area — can be delivered in a way that maintains environmental function, cultural relationships and everyday quality.

54. If the system is to deliver well-functioning environments (or even well-functioning areas), it must retain the evidence needed to understand physical, cultural and perceptual dimensions. Clause 14's exclusions break the connection between the intentions expressed in the goals and the information required to implement them. This internal misalignment risks undermining the effectiveness of the new system and weakening the coherence it seeks to create.

Where the Bills Misalign

55. Several provisions within the Planning Bill and Natural Environment Bill create practical misalignments that will limit the system's ability to deliver the outcomes it seeks. These issues do not arise from the Bills' overall direction—which we broadly support—but from the operational detail. When read alongside the integrated understanding of environments we outlined earlier—environments shaped by physical processes, cultural relationships, identity, legibility and lived experience—it becomes clear that key clauses unintentionally constrain the evidence, scales and tools needed to sustain well-functioning environments. This will result in predictable and avoidable unintended consequences.

Clause 11 — Goals That Cannot Be Delivered

56. Clause 11 establishes goals that rely on decision makers being able to understand how environments function day to day, ensuring that land use does not unreasonably affect others. Creating well-functioning environments depends on the interplay of natural systems, settlement form, cultural relationships, local identity and the experiential qualities people rely on to make sense of place. Our professional understanding is that environments function through the synthesis of physical, associative and perceptual dimensions, which together shape how places work and how communities (including hapū and whānau) experience change.

57. However, because Clause 14 removes the very evidence and tools required to understand and manage coherence, identity, character and lived experience, the consenting process will be unable to test whether outcomes anticipated in spatial plans are being achieved. The everyday attributes that determine how a place functions—its legibility, neighbourhood structure, cultural relationships, public realm, and sense of place—will be out of scope for most assessments.

58. The result is an articulation of goals clause that cannot be reliably implemented. Spatial plans may set out a desired structure or pattern, but without the ability to consider the attributes through which people actually experience and interpret environments, and manage effects, delivery becomes uncertain. Over time, this gap will widen and plan direction will be progressively undermined.

59. This internal disconnect makes Clause 11's goals aspirational but operationally difficult to achieve.

When identification becomes a liability
If mapping a wetland or cultural landscape creates compensation risk, councils may hesitate to map it — especially on farmland. Unrecognised systems then fail silently, shifting bigger costs downstream. Evidence must be safe to use, or we incentivise blind spots.

Clause 14 — Exclusion of Essential Effect Domains

60. Clause 14(1)(e), (g) and (h), and parts of 14(1)(a), remove from most assessments the very attributes through which environments function coherently: local character and contextual coherence, identity, landscape coherence, visual qualities, and everyday amenity. As we have said, these dimensions are not peripheral or optional embellishments, but the core attributes that affect how environments hold together, how cumulative change is experienced, and how people form relationships with place.

61. By excluding these domains, the Bill creates structural blind spots. Councils will be unable to interpret how individual proposals interact with the broader patterns and qualities that underpin a region's character, nor whether incremental changes cumulatively undermine coherence, identity or environmental function. Spatial plans may express clear expectations, but the consenting framework will not be able to test alignment. This disconnect prevents Clause 11's goals from being meaningfully implemented and increases the likelihood of gradual, unmonitored drift in environmental quality and community wellbeing.

Clauses 27 and 28 — Absence of Mandated Place-based *Evidence*

62. Spatial plans are expected to integrate natural systems, hazards, infrastructure sequencing, cultural landscapes and settlement form, yet the Bill does not require that this work be grounded in a single, region wide place-based evidence base. As we described earlier, such evidence—capturing physical structure, cultural relationships, experiential qualities and system connections—is essential if spatial planning is to be coherent and durable.

63. Without a mandated evidence base, baselines will vary between regions, assumptions will drift between planning tiers, and fundamental matters will be relitigated repeatedly. Spatial plans, land use plans and consents may each rely on subtly different interpretations of how environments function, weakening consistency and undermining the clarity the reform is intended to achieve. The absence of a mandated evidence base is a core structural vulnerability.

Misalignment Between the Planning Bill and Natural Environment Bill

64. The Planning Bill and Natural Environment Bill adopt different conceptual framings—"urban and rural areas" in one and "environment," "limits" and "long-term outcomes" in the other. These frameworks do not share definitions, scales or evidential anchors, yet combined plans must implement both. This misalignment creates uncertainty about how environmental limits should interact with spatial planning decisions, how development capacity should be interpreted alongside ecosystem health, and how planning committees should reconcile overlapping duties.

65. Not identifying natural landscapes and natural character as goals in the Natural Environment Bill creates a gap that could weaken their protection in practice. If these values are not required to be mapped in Natural Environment Plans, land use changes may neither trigger a planning consent under the Planning Bill nor a natural environment permit under the Natural Environment Bill, allowing effects on these areas to proceed without any regulatory oversight.

66. Such tensions do not resolve themselves in practice. Instead, they generate inconsistent implementation, increased interpretation burden and avoidable litigation risk. The system requires a shared, integrated definition of environment—aligned with contemporary practice and the established approaches that are set out in *Te Tangi a te Manu*—so that "environment," "place" and "function" are understood consistently across both Acts.

Regulatory Relief Framework — Incentives That Undermine Evidence

67. The regulatory relief framework requires councils to compensate landowners where planning provisions impose a "significant burden," yet this threshold is undefined. This risks valued landscapes losing protection, as councils may lack the resources to provide compensation, causing spatial planning decisions to be shaped by liability management rather than environmental need or cultural relationships.

68. This approach is incompatible with an evidence led system. The relief provisions undermine the Planning Bill's goals, which require councils to protect areas of high natural character, outstanding natural features and landscapes, and sites of significance to tāngata whenua. Councils would be required to provide relief for the very protections the Bill obliges them to apply.

69. If councils cannot provide relief, the goals of the Planning Bill will not be achieved. By treating mapped landscapes and features as a "restriction," the Bill frames them as a negative on property value, ignoring the positive role they play in well-functioning environments. The technique of granting additional development rights elsewhere is also problematic, as it may undermine the protections that triggered relief in the first place.

Planning Geographies Misaligned with Environmental Function

70. The Bills retain planning geographies tied to administrative boundaries, rather than the functional scales at which environments actually operate. Natural systems, ecological networks, cultural landscapes, hazard pathways and infrastructure systems regularly extend across regional lines, yet spatial plans are not required to reflect these environmental realities. This leads to predictable consequences: fragmented ecological corridors, inconsistent hazard management, misaligned infrastructure planning, and spatial strategies that must be continually adjusted because they do not match the landscapes they regulate.

71. In our opinion, aligning planning geographies with environmental function is essential if the system is to deliver coherent, resilient and predictable outcomes. Sustainable, well-functioning environments cannot be achieved when planning occurs at scales disconnected from the systems that shape them.

Kaikōura Earthquake Response
Image: WSP, NZTA

Tank Park, Wyndham Quarter, Auckland
Image: LandLAB

PART 3 — GUIDANCE

Recommended Principle 1: Enable Place-based Decisions

Character and rural identity rely on patterns:
Rural identity comes from open land, working rhythms, dark skies, legible routes and settlement forms shaped by landform. Insert a scale, height or placement that breaks those patterns and the place stops feeling like itself — even when the technical standards are met.

72. Decision making must remain timely and proportionate while still retaining a place-based understanding of how development interacts with the coherence, identity and functioning of environments. As set out in Parts 1 and 2, what is often labelled "landscape" is not individual preference—it requires engaging with the relationship between people and the natural and built systems they live within, expressed through settlement form, nature-based systems, cultural connections including for hapū and whānau and everyday experience. This requires processes that remain efficient for plan aligned proposals while providing proportionate opportunities to be heard when development exceeds what plans signalled. These factors are fundamental to enabling well-functioning environments.

73. When a proposal materially departs from what a spatial or combined plan anticipates, the system must provide a proportionate pathway for considering the additional effects and for ensuring affected communities can be heard. A material departure refers to development that goes beyond the scale, form or location anticipated in the relevant spatial or combined plan.

74. Clause 14's prohibitions on considering effects on landscape, character, appearance, aesthetic qualities and visual amenity create a systemic gap: although spatial plans may still identify these values, their purpose is significantly diminished if effects on them cannot be considered. Removing these prohibitions encourages spatial planning to properly reflect these place-based factors, giving clearer direction for development and enabling proposals to align with community and environmental outcomes. And when proposals fall outside the intended directions, it restores the ability for decision makers to draw on this same shared understanding of place to assess whether the proposal would still support a well-functioning environment.

75. Retaining this ability improves certainty. It ensures compliant proposals proceed smoothly while providing a proportionate safeguard where the functioning of an environment is genuinely at stake. This strengthens the plan led system: one shared evidence base informs spatial choices and plan provisions, and those provisions then guide decisions—using the same consistent understanding of how places work, rather than subjective interpretation.

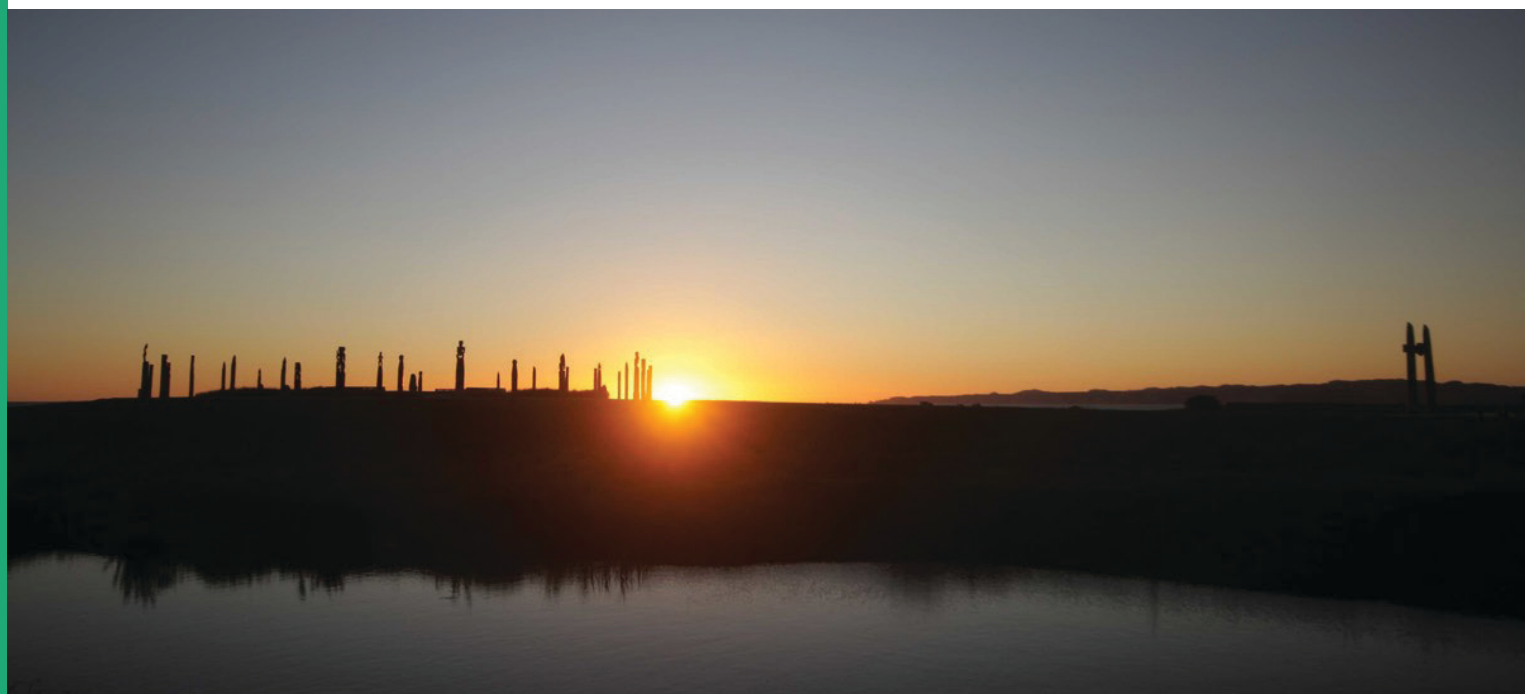
76. In addition to restoring access to essential evidence including cultural

knowledge (mātauranga Māori), the system must also include a clear, proportionate participation pathway for proposals that materially depart from planned expectations.

77. The following amendments are required to enable spatial plans and combined plans to use the shared place-based evidence and to restore the ability of decision-makers to assess whether proposals support well-functioning environments:

- Remove from Clause 14 the subsections that prohibit consideration of the physical, cultural and experiential qualities of place. Their removal restores the ability for plan writers and decision makers to use the shared place-based evidence to understand and manage the effects of environmental functioning across the system.
- Reflect this restoration consistently across the Bill—including clearer goals (Clause 4), refined treatment of effects (Clause 11), and strengthened requirements for shared place-based evidence and definitions—so that these considerations are properly embedded in the plan led framework without broadening the overall scope of effects or reopening generalised amenity assessments.
- A corresponding procedural safeguard is also needed so that when a proposal materially departs from what spatial or combined plans anticipate, affected communities have a proportionate opportunity to be heard.

Waitangi, Hawke's Bay
Image: Wayfinder



Recommended Principle 2: One Evidence Base

78. The planning system depends on a single, coherent understanding of how environments function. As set out in Parts 1 and 2 of our submission, environments in Aotearoa New Zealand are integrated across urban, rural, coastal and natural settings shaped by the interplay of physical processes, cultural relationships, settlement form and lived experience. Spatial plans are intended to bring these elements together and direct long-term change, but the Bills do not require the evidence supporting this work to be prepared once and then consistently applied through the whole system. Without this anchor, baselines diverge, assumptions shift between tiers, and communities, practitioners and decision makers lose confidence that outcomes will be delivered as intended.

79. Our professional guidelines, *Te Tangi a te Manu*, already provide the framework for building such evidence. They require environments to be understood through the combined physical, associative and perceptual dimensions, using transparent reasoning, proportionate effort and tikanga aligned engagement. This approach is now widely recognised by allied professionals as a consistent, defensible way to describe place and how it functions (refer to Case Study 11, Appendix B).

80. Preparing this evidence base once at the regional scale provides a robust foundation for spatial planning while removing the duplication and re litigation that occur when each tier builds its own baseline, an issue highlighted in Part 2 of our submission. It also strengthens fairness: applicants and communities work from the same understanding of place, and plan aligned proposals can move efficiently because expectations are clear.

81. Requiring one region wide, place-based evidence base also improves system integrity. It ensures that the goals expressed in Clause 11 can be operationalised, that spatial plans can genuinely integrate natural systems and settlement patterns, and that combined plans translate those directions without loss of meaning. It preserves local distinctiveness by allowing regions to tailor the detail, but within a consistent national framework that defines what the evidence must contain and how it is used. This approach supports clarity, efficiency and public trust, while aligning with established practice rather than inventing new concepts or methods.

82. The amendments below establish one region-wide place-based evidence base that provides the foundation for spatial plans, combined plans and consistent consenting decisions:

- Strengthen Clause 4 of the Planning Bill by inserting definitions of place-based evidence and nature-based systems, and amend Clause 27 so regional spatial plans are required to prepare one region wide, place-based evidence base that integrates natural systems, cultural relationships, settlement form and lived experience.
- Amend Schedule 2 (Clause 3) to require mapped and narrative descriptions of environments and nature-based systems at the regional scale using transparent and proportionate methods, and require combined plans under Clauses 27 and 28 to use this evidence base without reinterpretation unless replaced by a new region wide suite.
- Insert a duty in the Planning Bill that combined plans must rely on the spatial plan's evidence base for both land use and natural environment components, and insert a corresponding alignment duty in the Natural Environment Bill requiring natural environment plans to use the same evidence when setting limits, outcomes and rules across all well-functioning environments.
- Require clear identification of the evidence base version relied on in combined plans, enable formal region wide updates when significant new information arises, and authorise national mapping templates, definitions and data standards to support consistent application across regions and alignment between the Planning Bill and the Natural Environment Bill.

Recommended Principle 3: Shared Definitions

83. The system requires a shared and practical language for understanding how environments function. As set out in Parts 1 and 2 of our submission, and further expanded in Appendix A, well-functioning environments arise from the interplay of natural processes, cultural relationships, settlement patterns and everyday lived experience. These concepts, long established across planning, design and environmental assessment, recognise that environments are understood through their physical, associative and perceptual dimensions and the way these dimensions interact to form coherent places.

84. The current Bills do not provide this shared vocabulary, instead using different framings and leaving key concepts undefined. Without clear definitions and concise national criteria, we are of the opinion that regional planners and decision makers will continue to reinterpret what "well-functioning" means, weakening certainty, consistency and the ability to operationalise Clause 11.

85. Clear definitions and national criteria resolve this gap and make the system more workable. A single definition of environments covering well-functioning environments (including those across urban, rural, coastal and natural settings, and the natural and people based systems within, between and connecting them) aligns the Bills with how places actually function and with the integrated systems approach outlined earlier in our submission. National criteria for well-functioning environments allow spatial plans, combined plans and consenting to work to the same outcomes, improving predictability and reducing re-litigation. These criteria should reflect the qualities people rely on: public realm values and sense of place, access and movement networks, connected nature-based systems, climate and hazard resilience, cultural relationships and community wellbeing, and efficient land use and infrastructure.

86. This direction does not introduce new concepts; rather, it clarifies those already in widespread use and ensures both Bills operate from a common environmental foundation. Clear national criteria provide a consistent baseline while allowing regions to add locally specific elements where justified by the region wide place-based evidence base. This improves fairness, supports predictable decision making, and reduces re-litigation. It also creates a credible basis for streamlined processing of plan aligned proposals, while ensuring that departures are assessed against the same clear, nationally understood outcomes.

87. National Policy Direction should set the criteria for well-functioning environments, and National Standards should enable these criteria through templates, definitions, mapping methods and data requirements.

88. The following changes create a shared vocabulary and nationally consistent criteria so that plans and decisions apply the same understanding of environments across all tiers of the system:

- Planning Bill: amend Clause 4 and Clause 11 to include a shared definition of well-functioning environments across urban, rural, coastal and natural settings; replace references to areas where appropriate (noting natural environments can standalone and also exist within, between and across urban, rural and coastal environments); and authorise concise national criteria for well-functioning environments that plans and decisions must implement.
- National criteria: enable national direction to set concise criteria for well-functioning environments, including public realm quality, identity and local character, access and movement, connected nature-based systems, climate and hazard resilience, emissions reduction, cultural relationships, community (including hapū and whānau) wellbeing, and efficient land use and infrastructure patterns. Allow regions to refine or add locally justified elements based on the region wide place-based evidence base.
- Planning Bill alignment duties (Clauses 27 and 28): require regional spatial plans and combined plans to show how their spatial choices, zones, overlays and standards give effect to the national criteria across urban, rural, coastal and natural settings, using the shared evidence base established under Direction 2.
- Natural Environment Bill alignment: require natural environment plans to apply the same criteria when setting limits, outcomes and rules. This should include provision for natural landscapes and natural character, ensuring consistent interpretation across both Acts, and require clear line of sight between the criteria, the evidence base and the provisions used to implement them.

Recommended Principle 4: Track Change

89. The system must be able to recognise and respond to cumulative change if it is to achieve the long-term outcomes described in Parts 1 and 2 of our submission. Environments in Aotearoa New Zealand function as interconnected systems across urban, rural, coastal and natural settings whose performance evolves through the accumulation of many everyday decisions. As we have outlined, well-functioning environments depend on coherent structure, clear baselines and the lived relationships people form with place over time. Without tools to track cumulative change, these qualities gradually erode, environmental functioning becomes less predictable, and confidence in the system weakens.

90. This direction reflects long established practice across planning, design and environmental assessment, including the principles embedded in *Te Tangi a te Manu*, which recognise that environments must be understood not only through their physical, associative and perceptual dimensions, but also through how these dimensions change over time. Cumulative change can strengthen environmental quality, identity and resilience, or it can steadily undermine them if left unmonitored.

91. The Bills currently do not provide a clear way to measure or interpret these trends. Without simple, durable indicators supported by a region-wide, place-based evidence framework, councils, practitioners, communities, hapū and whānau cannot tell whether everyday decisions are improving environmental functioning or accelerating decline.

92. Introducing a concise national indicator suite, supported by clear reporting and adaptive responses, provides a practical and proportionate way to close this gap. It allows spatial plans to identify where improvement is required, enables combined plans to guide everyday development toward that improvement, and ensures that decision makers have a transparent way to assess progress against the outcomes the system seeks. This approach improves fairness, strengthens public trust, and supports long-term enhancement without adding unnecessary complexity. It also ensures that positive change becomes a routine expectation across the system, rather than an aspiration dependent on large, infrequent interventions.

93. The amendments below ensure that cumulative change is visible and that plans and decisions respond consistently to clear, nationally aligned indicators:

- Planning Bill – Clause 27 and Schedule 2 (Clause 3): Require regional spatial plans to apply the national indicators when assessing existing conditions and identifying where improvement is needed.
- Planning Bill – combined plan duties (Clauses 27 and 28): Require combined plans to monitor the indicators, report on trends, and specify adaptive responses, with a clear line of sight to the region wide place-based evidence base.
- Planning Bill – combined plan content (Clauses 27 and 28): Require combined plans to direct everyday development to contribute to improvement where indicators or the evidence base identify deficits, providing the mechanism for delivering the outcomes sought in Parts 4 and 5.
- Natural Environment Bill – national direction: Require national direction to set a concise suite of indicators for cumulative change and environmental functioning across urban, rural, coastal and natural settings.

Use the same maps and the same story of place:
Spatial plans, land use plans and consents should rely on the same mapped systems, the same description of places, and the same understanding of movement and identity. Without that anchor, good intentions get lost between stages and decisions don't line up on the ground.

Recommended Principle 5: Functional Scales

94. Spatial planning must work with the environmental systems that actually shape how places function. These systems — such as catchments, ecological networks, coastal processes, hazard pathways and movement patterns — operate across and beyond administrative boundaries. When planning is organised around jurisdictional lines rather than these functional systems, it becomes harder to anticipate risk, align infrastructure, or support coherent and efficient growth. This disconnect leads to fragmented outcomes and higher long term costs for both communities, hapū, whānau and councils.

95. Understanding these functional systems requires attention to the interactions between natural processes, built form, cultural relationships and human experience. These interactions reveal the underlying structure of a place — its land–water systems, ecological connections, hazard pathways, and the settlement patterns that have formed around them. Identifying this structure early allows spatial plans to integrate and protect nature-based systems, and organise growth in ways that support resilience, identity and everyday wellbeing. When this understanding is missing, planning becomes reactive, fragmented and more costly to deliver over time.

96. These systems operate across multiple scales — from sub-catchment to catchment, neighbourhood to district, and coastal areas to regional shoreline — and spatial plans should identify the appropriate functional scale for each.

97. Treating nature-based systems as core infrastructure provides clarity for growth, reduces long-term costs and improves environmental performance. Sequencing development around these systems ensures resilience and hazard mitigation are built into the pattern of settlement rather than retrofitted later. This approach supports efficient infrastructure delivery, strengthens public confidence and ensures that development builds on, rather than works against, the underlying structure and function of the landscape.

98. The following changes require spatial plans and combined plans to recognise and protect the functional environmental systems that shape how places operate, and to sequence growth around these systems:

- Planning Bill – Clause 27 and Schedule 2 (Clause 3): Require regional spatial plans to map and describe functional environmental systems, including catchments, ecological networks, coastal processes, hazard pathways and nature-based systems.
- Planning Bill – combined plan duties (Clauses 27 and 28): Require combined plans to protect and integrate these systems and to set provisions that maintain or enhance their continuity, quality and performance.
- Planning Bill – combined plan content (Clauses 27 and 28): Require combined plans to treat nature-based systems as core infrastructure for resilience, public wellbeing, climate adaptation and ecological continuity.
- Planning Bill – sequencing duties: Require sequencing of development to align with the timing of nature-based system protection or delivery, ensuring that growth only proceeds where these systems are already secured or programmed.

Durable mapping protects confidence:
If erosion overlays, hazard corridors or culturally important coastal places can be quietly altered later, people lose confidence fast. Durable mapping signals that key decisions won't slide through procedural gaps, allowing households, investors and councils to plan and adapt with certainty.

Recommended Principle 6: Implementation Integrity

99. The planning system will only function as intended if implementation is consistent, transparent and durable across all regions. The earlier directions set out the evidence base, the definitions, the criteria, the indicators and the functional scales required for well-functioning environments. For these elements to produce reliable outcomes, the system must provide clear implementation tools that ensure regional spatial plans and combined plans apply this framework in a structured and consistent way. Templates, mapping standards, and clear identification methods are essential to prevent drift, reduce contention, and keep the system predictable for councils, communities and applicants.

100. Consistent implementation is also necessary to protect the integrity of place-based evidence. Without nationally required methods and data structures, regions risk creating inconsistent baselines, undermining the clarity that the new system is intended to provide. When regions use different approaches to identifying valued landscapes, cultural landscapes or nature-based systems, decisions become harder to compare, cumulative change becomes more difficult to track, and the intended efficiencies of spatial planning are weakened. Ensuring that all regions apply the same core evidential methods allows spatial plans and combined plans to operate from the same starting point while still enabling local distinctiveness in the content of the evidence itself.

101. Finally, implementation integrity requires safeguards that protect evidence-based identification from being weakened by later processes. Relief mechanisms, plan variations, and discretionary departures must not be able to override the region-wide place-based evidence, the mapped functional systems or the methods used to identify valued landscapes and culturally significant places. If these protections are not explicit, councils may avoid identifying important environmental or cultural systems in order to reduce exposure to financial or political risk. Clear statutory safeguards are therefore necessary to ensure that plan direction, evidence, and mapped systems are durable over time.

102. Without explicit safeguards, regulatory relief would incentivise councils to avoid identifying valued landscapes, cultural landscapes and nature-based systems in order to minimise financial exposure. This undermines the evidence base, weakens spatial planning and creates inconsistencies between planning regions.

Waiheke Island
Image: DJ Scott Associates

103. National Policy Direction should set the strategic requirements for spatial plans and combined plans, while National Standards should provide the detailed templates, mapping schemas and minimum datasets needed for consistent implementation.

104. The amendments below secure consistent delivery by setting clear methods, templates and safeguards so that evidence, mapped systems and identified values are applied reliably across regions and over time:

- Require national standards to mandate templates, mapping processes and minimum datasets for regional spatial plans and combined plans, including structured layers for catchments, ecological networks, hazard pathways and nature-based systems.
- Amend Clause 27 and Schedule 2, Clause 3 of the Planning Bill to require explicit, evidence-based methods for identifying valued landscapes, cultural landscapes and nature-based systems, prepared once at a regional scale and carried through into combined plans.
- Amend Clauses 27 and 28 to require combined plans to integrate and protect the mapped functional environmental systems and to demonstrate clear alignment with the region wide place-based evidence base.
- Amend Clause 4 definitions and Clause 11 goals so that the region wide place-based evidence and nationally consistent criteria for well-functioning environments become mandatory reference points for plan drafting, evaluation reports and decisions.
- Insert a provision stating that regulatory relief cannot override or weaken the region wide place-based evidence base required under Clause 27 and Schedule 2, Clause 3.
- Insert a provision stating that regulatory relief cannot apply to mapped nature-based systems, functional environmental systems, valued landscapes or culturally significant places, as identified using the required methods under Clauses 27 and 28.

PART 4 — OUTCOMES SOUGHT (PLANNING BILL)

Clause 4 — Definitions

Overview

105. The following outcomes sought give effect to the six directions we established in Part 3. Those directions identified the need for a shared evidence base, shared definitions, nationally consistent criteria and functional planning scales. This section sets out how Clause 4 must be amended so the rest of the system can be delivered as intended.

106. Clause 4 must give the system a practical, shared vocabulary. Spatial planning and combined plans only work if decision-makers and practitioners are operating from the same definitions of well-functioning environments, nature-based systems, and place-based evidence. As drafted, the Bill leaves critical concepts unclear, which risks inconsistent interpretation and re-litigation down the track.

107. The definition of well-functioning environments needs to reflect how places perform: their physical form and condition, how they are used and experienced day-to-day, what they mean to communities, and the natural processes that support them.

108. The term "nature-based systems" is technical and open to interpretation, but it is critical to how the Planning Bill will interface with the Natural Environment Bill. A clear definition ensures the system recognises the land–water processes that underpin hazard mitigation, environmental performance and everyday use by people.

109. Likewise, "place-based evidence" needs to set a single evidence base for spatial planning that flows consistently through plan making and consenting.

110. This clarity belongs in Clause 4. It sets the footing for national instruments to specify detail, for spatial plans to direct change, and for consent decisions to implement those directions predictably.

People experience coasts as whole environments:
A coastal town isn't just "urban" or "rural." It's tides, dunes, winds, public access, views, heritage, everyday routines and safety in storms. Goals framed by environments — not just areas — reflect how places actually work and how communities experience them.

Specific Changes Recommended

111. Amend Clause 4 as follows (also refer to Appendix A which contains more detailed definitions for environments across the four settings we describe - urban, rural, coastal and natural):

- Replace the current definition of well-functioning environments with

  "Environments are integrated systems across urban, rural, coastal and natural settings. A well-functioning environment operates coherently within and across nature-based and people-based systems; is legible and supports identity and heritage; sustains ecological and social functioning; enables context-appropriate use and development; and is resilient to hazards, climate pressures and cumulative change."

- Insert a definition of nature-based systems:

  "Interconnected land–water–coastal processes and ecological networks — including soils, aquifers and waterways; wetlands and riparian corridors; dunes, estuaries and coastal processes; indigenous habitats and canopy cover — that absorb, filter and regulate environmental change, support biodiversity and hazard mitigation, and provide everyday amenity and climate adaptation services."

- Insert a definition of place-based evidence:

  "Mapped and narrative information that describes the physical, natural, cultural and experiential characteristics of environments and the relationships between people, settlements and natural processes, prepared once at the regional scale and used consistently across spatial planning, combined plans and consenting."

Clause 11 — Goals

Overview

112. Clause 11 needs to reflect the system directions we established in Part 3. Those directions require consistent definitions, nationally aligned criteria and a single evidence base. The goals clause must embed these elements so the system operates coherently from national direction through to consenting.

113. Clause 11 must anchor the system with goals that actually reflect where and how it operates: across urban, rural, coastal and natural settings and including natural and people based systems. Framing the goal as "urban and rural areas" is too narrow for a system that relies on place-based evidence and spatial planning across whole environments.

114. The Bill's architecture depends on national direction and spatial plans translating goals into practical outcomes. For those tools to work, the goals must speak to the qualities people experience and depend on: coherent settlement form, access and movement, practical resilience, and the performance of nature-based systems. These are the outcomes that plans and consents must consistently deliver.

115. Clause 11 is the directive provision in this Bill. It should express "well-functioning environments", and it should authorise nationally consistent criteria so regions aren't left to reinvent or relitigate what good looks like. We specifically recommend the use of "environments" rather than "areas" to help with clarity of alignment between the two Bills.

Specific Changes Recommended

116. Amend Clause 11 as follows:

- Amend 11(1)(c) to read: "to create well-functioning environments across urban, rural, coastal and natural settings (including the natural and people based systems within and across them);"
- Insert 11(1)(ca): "to give effect to nationally consistent criteria for well-functioning environments, including public realm and outdoor living quality, local identity, accessibility (including public and active transport), nature-based systems, emissions reduction and climate resilience."

117. Also consequential changes will be needed to clauses 54, 59, 67, 75, Schedule 2 and Schedule 3 to reflect the changes noted above.

Clause 13 — Procedural Principles (Material Departure Participation)

Overview

118. The planning system relies on public confidence in fair, predictable and transparent processes. Clear expectations are set through national direction and regional spatial planning. When proposals align with what plans anticipate, streamlined processes are appropriate and efficient. However, when a proposal materially departs from the scale, type or location of development anticipated in spatial or combined plans, affected communities should have a proportionate opportunity to be heard.

119. This reflects long-established principles of natural justice and aligns with professional experience that unanticipated impacts undermine both trust and environmental outcomes. Our professional experience indicates that the system must maintain a fair participation pathway when development exceeds expectations. This requirement has not yet been explicitly embedded in Clause 13 of the Planning Bill.

120. Adding a procedural safeguard in Clause 13 ensures the system remains balanced: efficient for plan-aligned proposals, but fair and legitimate when scale or impact goes beyond what the spatial plan signalled.

Specific Changes Recommended

121. Insert a new Clause 13(1)(d):

> "decision-making processes must provide proportionate opportunities for participation where a proposal materially departs from the scale, type or location of development anticipated in the relevant spatial or combined plan."

Clause 14 — Effects Outside Scope

Overview

122. The amendments to Clause 14 give direct effect to the system directions set out in Part 3, particularly the need to retain the physical, cultural and experiential information that spatial plans and combined plans rely on. Those directions establish that well-functioning environments cannot be delivered if essential attributes are excluded from consideration, and Clause 14 must therefore be aligned with the evidence base, definitions and criteria outlined earlier.

123. The exclusions in 14(1)(a), (e), (g) and (h) remove the very evidence needed to assess whether proposals will contribute to well-functioning environments. Appearance, identity, landscape coherence, local character and contextual coherence, and cumulative change are not cosmetic extras; they are how places work in practice and how change is experienced by communities.

124. The Government's system reset—spatial planning, stronger national direction, simplified consent pathways—already provides the efficiency gains sought. Further excluding effects is unnecessary and counter-productive. It prevents decision-makers from testing alignment with spatial plans and national criteria, and it weakens natural justice by removing legitimate grounds for affected people to be heard.

Rotorua Lakefront
Image: Isthmus

Obvious effects aren't always measurable:
A single structure on a prominent ridgeline might meet height and setback rules yet dominate a valley, collapsing the sense of openness and continuity people associate with that place. Communities feel that change, even when a spreadsheet doesn't.

125. We agree that the internal layout of buildings and specific requirements for outdoor or garden amenity are not of fundamental importance to the concept of well-functioning. However, there are sometimes external and site layout issues that directly cause effects on neighbours and communities, directly impacting how people enjoy their property. We recommend that clause 14(1)(a) be amended to relate only to internal function and on-site amenity.

126. Deleting (e), (g) and (h) does not re-open broad, unfocused assessments. Spatial plans and nationally defined criteria will narrow the field to what matters and what was signalled. Restoring these effect domains simply lets the new system function as intended: clear upfront direction, implemented with evidence at decision time, allowing communities to have their say when effects are inconsistent to what has been anticipated through the top-down process.

Specific Changes Recommended

127. Delete the following from Clause 14(1):

- 14(1) (e)
- 14(1) (g)
- 14(1) (h)

128. Amend Clause 14(1)(a) to "the internal and external layout of buildings where it relates only to internal function and on-site amenity, and the provision of private open space".

Clause 27 and Schedule 2, Clause 3 - Place-based Evidence

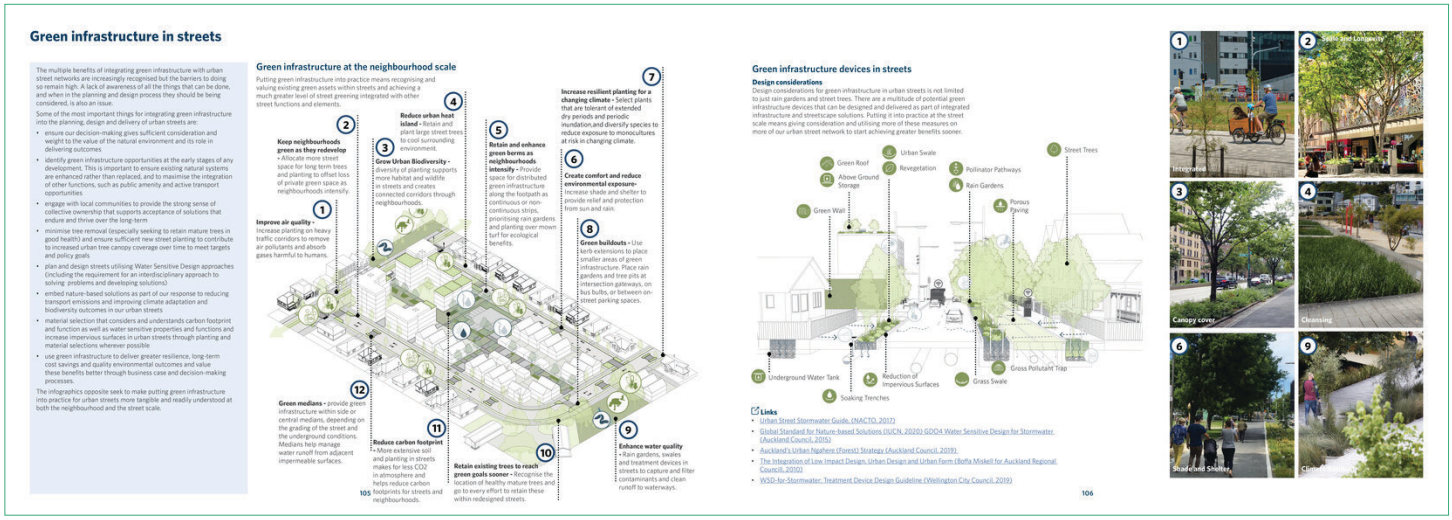
Overview

129. The changes to Clause 27 and Schedule 2 give effect to the system directions outlined in Part 3 of our submission, particularly the need for a region-wide evidence base, nationally consistent criteria and planning at functional environmental scales. These directions require spatial plans to be built on a single, transparent description of environments so that combined plans and consenting use the same baseline without reinterpretation.

130. Regional spatial plans must be grounded in a coherent, region-wide evidence base if they are to give clear direction to land use planning and consenting. The Bill relies on spatial plans to integrate environment, development, infrastructure and hazard considerations, yet it does not specify the baseline understanding of place required to support that integration.

131. A single, multi scale description of environments-covering physical form, function, local identity, cultural landscapes, and nature-based systems-is essential to avoid inconsistent baselines, prevent relitigation, and ensure that direction set at the strategic level is actually delivered through plans and decisions. Embedding this requirement in Schedule 2 ensures that all parts of the system are working from the same shared understanding of place.

Urban Street Planning Guide
Image: NZTA



Specific Changes Recommended

132. Amend Clause 27 - Purposes of Key Instruments:

133. Insert under the purpose of regional spatial plans:

> "to establish a single, shared place-based evidence base for use in land use plans and consenting."

134. Schedule 2 - Clause 3: Insert new Clause 3(1)(ca):

> "a description of the region's environments informed by place-based evidence prepared at multiple scales, including physical structure and condition, patterns of use and experience, associative and perceptual attributes, cultural landscapes, and local identity."

135. Insert new Clause 3(1)(cb):

- "a mapped and narrative description of nature-based systems, including land-water processes, ecological networks, natural hazard mitigation functions, and the contribution these systems make to environmental performance and community wellbeing."

136. Insert new Clause 3(1)(cc):

> "a requirement that the place-based evidence described in clauses (ca) and (cb) is prepared once for the region and carried through to land use plans and consenting without reinterpretation, unless superseded by new region wide evidence prepared to the same standard."

137. Insert new Clause 3(4):

> "For the purposes of this clause, 'place-based evidence' means information describing the physical, natural, cultural, and experiential characteristics of environments, and the relationships between people, settlements, and natural processes."

Clauses 27 & 28 — Nature-based Systems

Overview

138. The amendments to Clause 28 implement the system directions in Part 3 of our submission by requiring spatial plans and combined plans to recognise, protect and sequence development around the nature-based systems that support environmental functioning. These directions establish that nature-based systems are core infrastructure, and Clause 28 must therefore align with the region wide evidence base and the functional environmental scales identified earlier.

139. Nature-based systems should be treated as core infrastructure. They reduce risk, support environmental performance, and provide daily amenity in a cost efficient way when planned upfront. If they are not mapped, sequenced, protected and implemented, the system will default to costlier, less resilient fixes later.

140. This is the right time and place to embed that expectation. The Bill's emphasis on spatial planning and national direction makes it practical to turn evidence into delivery.

Specific Changes Recommended

141. Amend Clauses 27/28 to:

- direct regional spatial plans to map, sequence and protect nature-based systems; and
- require land use plans to implement them.

Fairlie Main Street
Image: WSP

Regulatory Relief

Overview

142. The position set out below gives effect to the system directions in Part 3, which require consistent evidence, clear mapping methods, nationally aligned criteria and safeguards that protect identified values and natural systems. However, the regulatory relief framework is fundamentally inconsistent with those directions because it creates incentives to avoid identifying important environmental and cultural systems and allows downstream processes to override evidence based mapping. Clause changes are therefore needed to maintain the integrity and coherence of the system.

143. Regulatory relief introduces structural risks that are inconsistent with the intent of the new planning system. The framework is premised on property rights protection and compensation mechanisms when planning provisions impose a "significant" impact on land use. However, the Bill does not define key concepts such as "significant burden", nor does it provide safeguards to ensure relief does not weaken important environmental protections or distort spatial planning decisions.

144. Because the new system relies on a shared evidence base, mapped natural systems and clear national criteria, any mechanism that financially penalises councils for identifying these values directly undermines the way the system is designed to function.

145. Requiring councils to offer relief whenever protections are applied fundamentally alters how values are identified and mapped. The risk of financial liability or compensation creates an incentive for the planning process to avoid identifying areas of high natural character, significant natural areas or outstanding natural landscapes—particularly where these values extend across large parts of a district or region. International experience shows that when financial exposure is tied to environmental identification, councils routinely under-identify important landscapes and ecological systems, leading to long term environmental and economic costs. This is directly at odds with the Bill's requirement to safeguard identified values and with the Natural Environment Bill's obligations around limits and long term environmental outcomes.

146. The relief framework is also disconnected from the system's evidence driven architecture. Spatial planning rests on a single evidence-base, nationally consistent criteria and a combined plan that integrates environmental and development outcomes. Relief inserts an external financial mechanism that overrides evidence based decisions and shifts planning outcomes based on fiscal exposure rather than

environmental need or spatial strategy. The framework also increases litigation risk by encouraging challenges to spatial plan mapping, evidence base updates and combined plan provisions. It reverses the intended shift toward upfront clarity by creating downstream opportunities to contest or weaken evidence based decisions made during spatial planning.

147. Our position does not oppose fairness for landowners; it recognises that a compensation mechanism of this kind cannot sit coherently within an evidence led planning framework. Relief also introduces unpredictable and potentially significant fiscal exposure for councils, creating costs that are difficult to manage over time.

148. For these reasons, we do not support the inclusion of regulatory relief in the Planning Bill.

Specific Changes Recommended

149. We are aware that others will provide much more detailed advice on how to remove the consideration of Regulatory Relief from the Bills. In short, this would involve deleting:

- All clauses establishing the relief framework.
- All definitions associated with relief (e.g., "significant burden").
- All cross references to relief throughout the Bill.
- All relief extensions in the Natural Environment Bill.
- All enabling powers that would allow relief to be reinstated through regulation.
- Explanatory Note references.

PART 5 — OUTCOMES SOUGHT (NEB)

Clause 11 — Goals

Overview

150. The goals of the Natural Environment Bill need to work alongside the planning system by reflecting how environments function in practice. Environments depend on the condition of ecosystems, the character of natural places, the quality of biodiversity and the performance of the natural processes that support communities. For the system to work as intended, the goals in this Bill need to clearly express this direction and point to the improvements the planning system is meant to support.

151. The Bill's purpose statement refers to enhancement, and this must be clearly reflected in the goals so that plans and limits work toward positive change rather than simply preventing further decline.

Specific Changes Recommended

152. Insert a new goal: to achieve net gain in indigenous biodiversity and the enhancement and long term improvement of natural character and ecosystem function, within environmental limits.

South Canterbury Transmission Line
Image: Lucas Associates

Alignment between the Natural Environment Bill and the Planning Bill

Overview

153. The two Acts must operate from the same starting point. This means natural environment plans need to use the same understanding of place that informs spatial plans and land use plans. Both Acts should work from the same descriptions of environments, the same functional scales, and the same understanding of natural processes and system relationships. Without this, the combined planning process will be inconsistent, harder to use and more open to dispute.

154. In particular, this includes the alignment and inclusion of the identification and consideration of outstanding natural landscapes, outstanding natural features and natural character across both Bills.

Specific Changes Recommended

155. Require natural environment plans, when prepared, to use the same region-wide place-based evidence that supports the regional spatial plan and land use plans.

156. Require natural environment plans to show how limits, outcomes and rules align with the well-functioning environments recognised through spatial planning.

157. Require the natural environment plan to use the same functional environmental systems mapped in the spatial plan, such as catchments, coastal processes, ecological networks and hazard pathways.

158. Include direct references to ONLs, ONFs and Natural Character.

Environmental Limits — Management Units and Methods

Overview

159. Environmental limits must relate to the systems that actually shape the health and performance of environments. These systems include the way water moves through land, how ecological networks function, how coastal processes operate and how natural hazards unfold. Limits need to be based on these real environmental patterns so they can be applied consistently across plans and decisions.

Specific Changes Recommended

160. Require management units and methods used for environmental limits to reflect the same functional systems used in the regional spatial plan.

161. Require decisions on environmental limits, and the supporting reports, to refer to the region wide place-based evidence and to show how the limits fit the mapped environmental systems.

162. Require action plans and caps on resource use to use the same management units and evidence base as the spatial plan and combined plan.

He Puna Taimoana
Image: Glasson Huxtable

Indicators, Monitoring and System Performance

Overview

163. To understand how environments are changing over time, the system needs a clear set of indicators that show whether conditions are improving or declining. These indicators should apply across all well-functioning environments (including those in urban, rural, coastal and natural settings) and should reflect how people experience the health, character and functioning of these places. They should also relate directly to the evidence base used in spatial and land use planning.

Specific Changes Recommended

164. Require national direction under this Bill to specify a concise indicator suite for environmental functioning across all environments.

165. Require councils and central government to monitor and report on these indicators and to link the results to updates of plans, including action plans and caps on resource use.

166. Require the indicator suite to be used consistently in spatial plans, land use plans and natural environment plans, so that both Acts respond to the same signals.

Natural Environment Plans — Content and Implementation

Overview

167. Natural environment plans must show a clear line from the shared evidence base to the limits, outcomes and rules that apply across a region. They also need to show how their provisions reflect the functional environmental systems shown in the spatial plan. This ensures that decisions made at the strategic level carry through to the rules that apply to everyday activities.

Specific Changes Recommended

168. Require natural environment plans to identify how each rule, overlay or method implements the relevant limit, indicator and management unit, and how it uses the region wide place-based evidence.

169. Require natural environment plans to include a statement of alignment with the regional spatial plan.

170. Require evaluation and justification reports for natural environment plans to show how limits, indicators and rules relate to each other and how they contribute to safeguarding or improving the functioning of environments.

Removal of References to Regulatory Relief

Overview

171. Any references in this Bill to regulatory relief are inconsistent with the system established by both Acts. Relief mechanisms create incentives to avoid identifying important natural or cultural features and make it harder to set and apply limits and rules consistently. They also weaken trust in the planning process by shifting decision making away from evidence and towards financial exposure.

Specific Changes Recommended

172. Remove all references to regulatory relief within this Bill, including any provisions that enable relief to affect the identification, mapping or implementation of limits, indicators or natural environment plan provisions.

Quay Street, Auckland
Image: LandLAB

PART 6 - CONCLUSIONS

173. The reforms before Parliament offer a significant opportunity to create a planning system that reflects how the environments of Aotearoa New Zealand actually function. Landscape architects work daily with the relationships between landforms, water, cultural connections, built form and lived experience. This practical, place-based understanding shows that environments operate as integrated systems across natural, rural, urban and coastal settings. A planning framework grounded in this reality will be better able to deliver the long-term environmental, social and economic outcomes communities rely on.

174. The value of getting this right is substantial: by our reckoning, the landscape of Aotearoa New Zealand is a $100 billion driver of national performance, underpinning primary production, tourism, the screen sector and our international reputation.

175. The Bills already move in positive directions. Stronger national direction, regional spatial planning and clearer pathways for tāngata whenua involvement create the basis for a more coherent and efficient system. However, several structural issues limit their ability to achieve the outcomes intended. These relate to the absence of a required region-wide evidence base, inconsistencies in environmental framing, the removal of essential information from decision making, and the lack of alignment between the two Bills. Our recommended refinements address these issues directly and proportionately.

176. A central requirement for a coherent system is one region-wide place-based evidence base, prepared once and applied consistently across spatial planning, combined plans and consenting. This removes duplication, prevents reinterpretation and provides the stable baseline needed for predictable decision making. Applicants, councils and communities can all work from the same understanding of how environments function and how change accumulates.

177. Alongside a shared evidence base, the system needs clear definitions and concise national criteria for well-functioning environments. These criteria should describe outcomes that matter for people and place: coherent settlement form, functioning nature-based systems, access and movement, cultural relationships, community wellbeing, hazard and climate resilience and the experiential qualities that shape identity. Shared criteria allow spatial plans, combined plans and consents to work toward the same outcomes, while still allowing regions to reflect local distinctiveness where supported by evidence.

178. Planning must also occur at the functional scales at which environmental systems operate, such as catchments, ecological networks, coastal processes and hazard pathways. Aligning planning to these systems enables growth to be sequenced around nature-based infrastructure, reduces long-term costs and strengthens resilience. When planning is tied only to administrative boundaries, outcomes become fragmented and must be continually corrected.

179. To avoid cumulative decline, the system also needs a clear way to track change over time. A concise national indicator set allows councils and communities to understand whether everyday decisions are improving or weakening environmental functioning, identity and resilience. This supports adaptive responses and ensures long-term goals remain visible and actionable.

180. The exclusions in Clause 14 present a significant barrier to achieving well-functioning environments because they remove consideration of the very attributes through which environments cohere: landscape, character, identity, appearance and experiential qualities. These are not matters of taste but core elements of how people experience place and how environments function over time. Restoring the ability to consider effects on these values ensures spatial plans retain practical force, supports a plan-led system and maintains fairness for communities.

181. Equally important is ensuring that the Planning Bill and Natural Environment Bill operate from the same environmental foundation. Using the same place-based evidence, functional scales and definitions across both Acts avoids mixed signals, prevents duplicated effort and reduces avoidable disputes when combined plans are prepared and implemented. The Natural Environment Bill should also clearly recognise environmental enhancement, not only protection, reflecting the reality that many environments require active improvement to function well.

182. Implementation integrity is essential. National standards should provide the mapping methods, data structures and templates needed to keep application consistent across regions. Safeguards must ensure that once identified, valued landscapes, nature-based systems and functional environmental systems cannot be undermined by later processes. The regulatory relief framework conflicts with these safeguards by discouraging accurate identification and exposing evidence-based decisions to later erosion. Removing these provisions maintains system coherence and ensures evidence remains safe to use.

183. Together, the refinements we recommend would create a planning system with a clear line of sight from evidence to spatial strategy to plan provisions and decision making. Councils would have a consistent framework to apply, applicants would have a clearer understanding of expectations and communities would see how decisions relate to the environments they know. This strengthens efficiency, reduces risk and supports long-term resilience.

184. Most importantly, the changes seek to protect the landscapes and enhance the landscapes that underpin New Zealand's identity, wellbeing and economic performance. They ensure that development contributes positively to the long-term health and character of the places where people live, work and gather. These refinements represent the most practical and durable way to deliver the intent of both Acts and to support current and future generations through a planning system that is coherent, predictable and aligned with how environments actually function.

Taihitai, Wellington
Image: Isthmus

AUTHORS AND APPROVALS

This submission has been prepared by Tuia Pito Ora New Zealand Institute of Landscape Architects. It has been approved for release by the NZILA Board.

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APPENDIX A:
DEFINITIONS OF WELL-FUNCTIONING ENVIRONMENTS

Purpose

This appendix summarises what "well-functioning environments" mean across the four settings we use throughout the submission — urban, rural, coastal and natural — noting that each setting contains both nature-based and people-based systems that overlap within, across and between them.

These statements reflect the shared attributes in Part 1 (integrated systems; legibility and coherence; ecological and social functioning; context-appropriate use and development; resilience to hazards, climate and cumulative change), and then highlight setting-specific emphases.

Shared attributes across all settings

A well-functioning environment:

- contributes to human well-being;
- includes natural environments within, between and across other settings;
- operates as an integrated system of natural processes, nature-based systems, settlement form and everyday use;
- is legible and coherent, supporting identity, heritage and wayfinding;
- sustains ecological and social functioning over time;
- enables context-appropriate use and development; and
- is resilient to hazards, climate pressures and cumulative change.

Urban environment

Definition (aligned with Urban Designers Institute Aotearoa)

"Well-functioning urban environments enable social, cultural and economic exchange; provide good accessibility for all people to housing, jobs, community and green spaces via walking, cycling and public transport; integrate built and natural elements; express local identity (including enabling tāngata whenua cultural expression); offer diversity and choice of housing; use land and infrastructure efficiently; and are resilient to effects of climate change."

Specific people-based systems

- settlement form, density and mixed-use patterns that maximise accessibility;
- connected street networks and public transport, universal access to services;
- high-quality, safe public realm and open spaces;
- diverse, context-specific housing and business capacity; and
- local identity and cultural expression in everyday community spaces.

Specific nature-based systems

- urban water systems (streams, wetlands, floodplains), soils and canopy cover;
- nature-based systems that manage stormwater, heat and microclimate;
- urban ecological links to peri-urban and rural habitats; and
- nature-based climate adaptation functions integrated with streets and open space.

Rural environment

Definition

"Well-functioning rural environments sustain primary production and a diversified rural economy, protect highly productive land from inappropriate fragmentation and land use, maintain open rural landscape character, safeguard the life-supporting capacity of water, soil and ecosystems, recognise mana whenua relationships (including wāhi tapu and papakāinga), manage reverse-sensitivity effects, and build resilience through appropriately located infrastructure (including renewable energy) and climate-smart land management."

Specific people-based systems

- rural production activities including agriculture, horticulture, viticulture, forestry and other food and fibre industries;
- rural settlement pattern, small towns and service nodes supporting production;
- access to education, health and emergency services with reliable transport/digital connectivity;
- fit-for-purpose rural activity rules that protect working rural character and manage reverse sensitivity; and
- recognition of tāngata whenua relationships with whenua and provision for papakāinga.

Specific nature-based systems

- highly productive soils, aquifers and catchments supporting food and fibre;
- indigenous vegetation, riparian networks, wetlands and shelterbelts for biodiversity and water quality;
- floodplains, unstable slopes and erosion-prone land managed through nature-based solutions; and
- climate-adaptation measures including restoration and precision land-use management.

Coastal environment

Definition

> "Well-functioning coastal environments support dynamic land–sea natural elements, patterns and processes, natural character and public access; integrate settlement and infrastructure with coastal hazards and climate adaptation; maintain cultural relationships with the coast; and manage cumulative change along the coast so that public space, ecology and identity endure."

Specific people-based systems

- settlement form and accessways oriented to coastal character and public use;
- walking/cycling links and coastal public realm that sustain everyday experience; and
- working waterfronts and recreation integrated with cultural values and safety.

Specific nature-based systems

- ecological processes, including both aquatic and terrestrial;
- dunes, beaches, estuaries, saltmarsh and coastal wetlands as first-line defence;
- headlands, cliffs and sediment pathways within coastal areas; and
- tidal, wave and wind processes informing setbacks and adaptation pathways.

Natural environment

Definition

> "Well-functioning natural environments integrate within, across and between rural, coastal and urban environments; maintaining and enhancing ecological processes, biodiversity, soil, vegetation, hydrology; maintaining landform integrity; and sustaining the life-supporting capacity of natural systems; while providing for cultural relationships, recreation and nature-based resilience. Natural environments can be standalone, and also exist within, between and across urban, rural and coastal settings."

Specific people-based systems

- customary relationships with ecosystems and places of significance;
- support community well-being;
- low-impact access and recreation compatible with ecological limits; and
- monitoring and restoration programmes that build ecological resilience.

Specific nature-based systems

- terrestrial, freshwater and marine ecosystems and corridors;
- headwater catchments, groundwater systems and soils; and
- geomorphology and natural hazard buffers that regulate environmental change.

Auckland City Centre
Image: Auckland Design Office

APPENDIX B:
CASE STUDIES & ILLUSTRATIVE EXAMPLES

1. The Value of Landscape to Aotearoa New Zealand

New Zealand's Rural Landscape - The National Brand

Increasing Revenue through Promotion of New Zealand's Rural Landscape

New Zealand's rural landscape is central to the nation's identity and brand. New Zealand's largest companies not only derive their commercial revenue ($100 Billion per annum) from the rural landscape but actively promote their product and brand through the beauty of the everyday setting of New Zealand's farms.

The full size Fonterra Truck that was taken to the Chinese Bakery Show, in Shanghai, featured the rural landscape on its livery. Over 400,000 delegates saw the truck. The brand campaign sought to differentiate New Zealand's product by connecting food to the healthy environment from where it was produced.

Without regard for New Zealand's landscape in our planning laws ad hoc development will endanger our rural environment and open spaces. The commercial value of the rural landscape is too significant to allow development to occur piecemeal.

2. Landscape as Framework for Development

Overall Landscape Framework to Promote Development - Integration of Landscape Treatment with Built Form

Provision for Exterior Space

The Landscape Framework as Successfully Constructed

The Wynyard Quarter is a successful example of a landscape-led plan process. Through consideration of landscape, exterior space and built form layout it has established this section of the Auckland Waterfront as an area of commercial vibrancy, sustainability and high livability.

The ongoing consideration of landscape effects, external space and building layout through the consenting process has maintained the desirability and character of this urban zone. This has enabled the area to continue to develop and attract further commercial investment. Regard for open space, public realm, aesthetic appearance and the integration of building layout has provided a well-functioning urban environment.

3. Regard for Landscape Supports Growth

Arrowtown in its Landscape Setting

Interface with the Braided and Dynamic River

Heritage Protection Alongside Prosperity

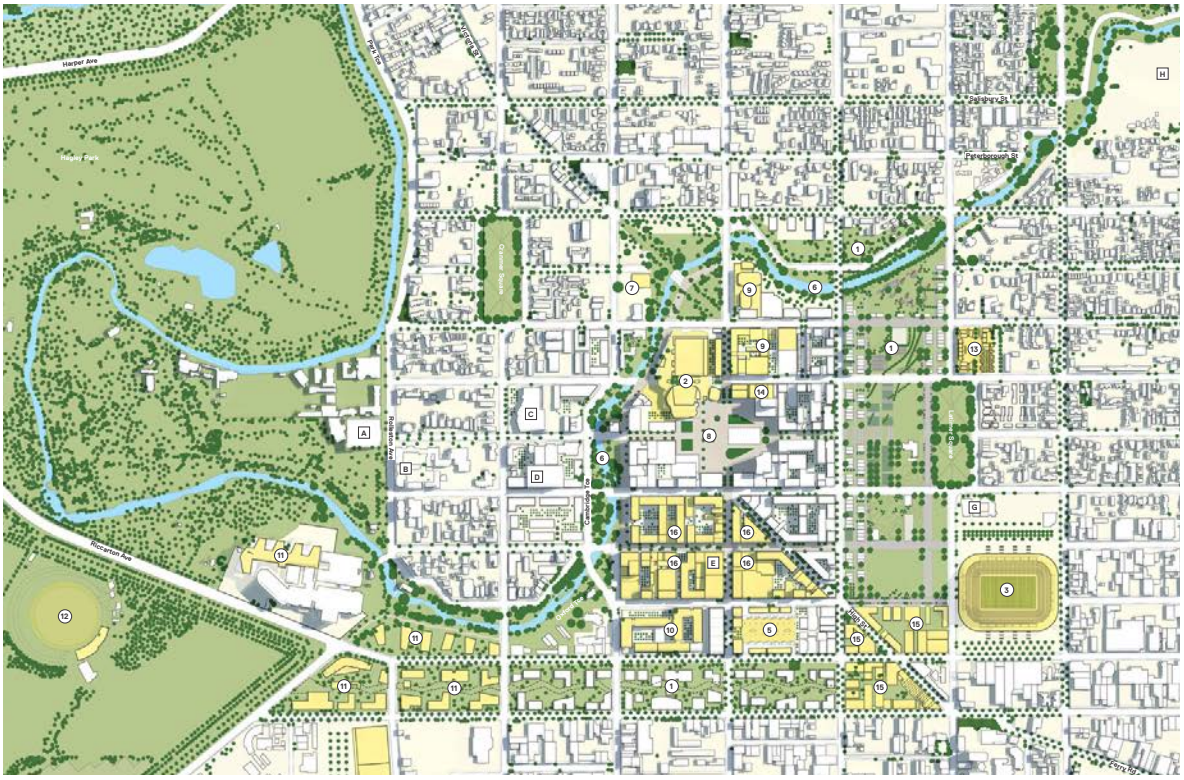
Modern Day Function Adjacent to Heritage Buildings

Arrowtown provides an excellent example of successful planning where consideration of landscape and the intergration of built form, character and natural systems have played a key role in the town's economic growth and general development. Arrowtown's strong sense of identity, aesthetic, and cohesiveness can in part be attributed to these matters.

Arrowtown has been voted 'Most beautiful small town in New Zealand' on more than one occasion. It has also become a highly popular tourist destination in its own right and a desirable place to live. While it is now often taken for granted that its setting and heritage are outstanding, sound planning and a landscape lead design approach over more than thirty (30) years has made a major contribution to its success. Community initiated and Council supported growth strategies facilitated by landscape architects in 1993, 2017 and 2022 developed recommendations and strategies that have stood the test of time, guided planning and design decisions to protect the town's character. In so doing they have also enabled rapid growth.

Economic Growth and prosperity that would not have been possible had landscape effect, visual amenity and building layout not been regarded over the past thirty (30) years.

4. Well-Functioning Urban Environments



The Christchurch Blueprint for Post Earthquake Reconstruction - An Integrated Approach Considering Landscape and External Building Layout

Consideration of Built Form and External Space

Reconnecting People with Ōtākaro, the Avon River

The Christchurch Blueprint (2012) for post earthquake reconstruction established a bold spatial framework integrating external built form and landscape. It created vibrant public spaces and embedded cultural identity through partnerships with Ngāi Tahu and local stakeholders. The plan emphasised reconnecting people with Ōtākaro, the Avon River. This landscape-led, culturally grounded approach set a coherent structure for regeneration, catalysing investment and enabling a more resilient, people-centred city. Today, Christchurch city is one of the most prosperous and talked about cities in the country.

Regard for landscape, open space, public realm, aesthetic appearance and the integration of exterior building layout has provided a well-functioning urban environment.

5. Well-Functioning Urban Environments - Residential

Hobsonville Point Masterplan: An Integrated Approach Considering Landscape and External Building Layout in a Residential Setting

Consideration of Landscape Supports Introduction of Appropriate Large Scale Built Form

Regard for Landscape Effect Enables Liveability Alongside Increased Density

Hobsonville Point illustrates the benefits of an integrated and holistic approach in a residential environment. Consideration of landscape, exterior private space provision, aesthetic appearance and building layout has delivered well-functioning urban space. This provides a marked improvement when compared to approaches that disregard landscape and building layout.

Increased density is enabled through consideration of these factors. High levels of liveabilty are acheived for residents at the same time as density is increased. Testament to the development's success can be seen in the retention of strong property values compared to surrounding areas. The Property Council of Australia has established empirical links between holistic development and increased returns described as a "design dividend".

6. Poor Outcomes: Dysfunctional Urban Environments

Density without Regard for Landscape Treatment

Bland and Monotonous Built Form

Building or Battleship?

By contrast developments in Whenuapai, Auckland (10mins from Hobsonville) have paid little attention to the relationship between landscape, exterior space and built form. Aesthetic appearance has been eschewed by developers in pursuit of maximum allowable yield and quick construction turn-around. Ownership turn over is high, new building stock remains unsold and property values stagnate. A lack of consideration for landscape and neglect of an holistic approach to development has failed to create a neighbourhood community. A dysfunctional urban area has ensued.

The disregard of landscape effects, external building layout and visual amenity will not produce a well-functioning urban environment.

7. Well-Functioning Rural Environments

The Landing - Rural Development, Vineyard, Countryside Living, Working Farm and Area of Ecological Enhancement

Spatial Planning:
Terrain Assessment

Spatial Planning:
Ecological Enhancement and
Catchment Areas

Internal Roads

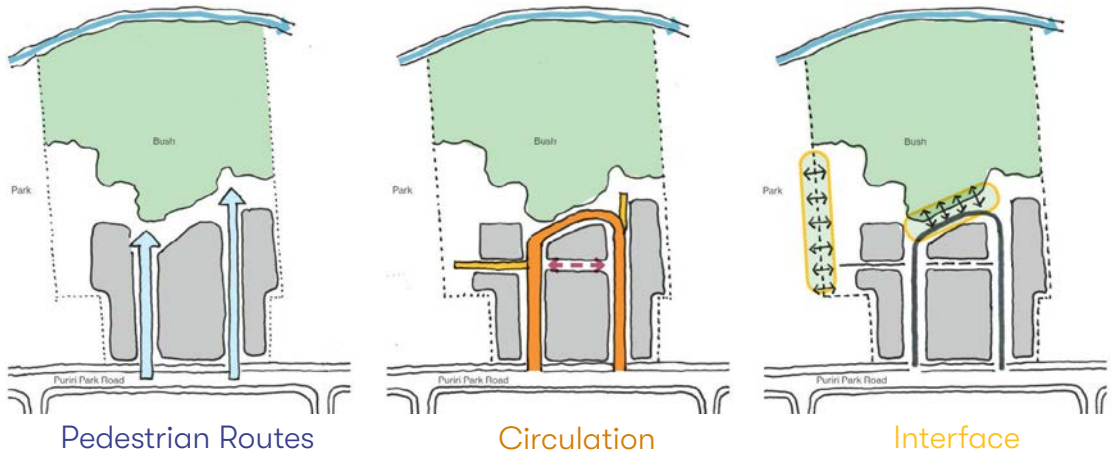
The Landing is a countryside residential living and working landscape project designed and planned in the early 2000's. Situated in New Zealand's stunning Bay of Islands, The Landing is a unique heritage and conservation property consisting of four hundred (400) hectares. It combines beaches, vineyards, rolling hills, wildlife sanctuaries and historic sites.

Through regard to nature based design principles and landscape considerations it has brought together a mix of seemingly conflicting objectives to provide increased development, ecological enhancement, heritage protection and continued farming. After ongoing long term development it now includes 38 dwellings, extensive revegetation and implementation of supporting roads and infrastructure.

Regard for landscape effect enables better design in the rural environment, creates community acceptability, value for land owners and enjoyment of private property. As exhibited in this project, it has transformed an everyday degraded rural landscape into a valuable ecological setting.

8. Efficiency through Participation and Place-Based Design

Pūriri Park Road, Whangarei - Completed Kainga Ora Development Designed with Connections to the Local Park and with Community Approval



Pūriri Park Road - Application of Landscape Design Principles Enabled Connectivity to the Local Park and Garnered Community Approval

Consultation with local community avoids wasted effort and time.

In Puriri Park Road, Whangārei, Kāinga Ora wasted valuable taxpayer dollars and time by designing a development that ignored an holistic approach and the community voice. Disregard for landscape connections and exterior building layout caused a backlash by the local community. Local community concerns included the loss of green space, and the potential impact of an intensive social housing development, that through its disregard of the landscape would create a ghetto.

This led the National MP for Whangarei, Mr Reti, to say - no one disagreed with the need for social housing in Whangārei, and it was not a case of "NIMBY" (not in my back yard) but a matter of finding the right "fit" for the suburb.

The development was later re-designed (as shown above) and through consideration of landscape and urban design principles proceeded with community backing.

9. Landscape Mitigation Enables Urban Infrastructure

Existing Outlook from Private Property in Huapai

Proposed Infrastructure (Substation) on Land Immediately Adjacent Private Property in Huapai

Proposed Infrastructure on Land Immediately Adjacent Private Property in Huapai - Successfully Screened by Planting to Mitigate Adverse Visual Effects on Neighbouring Private Property

Transpower are proposing a substation in west Auckland which, for operational reasons, is required to be located immediately adjacent to around 20 residential properties.

Landscape mitigation recommendations (setbacks, and the inclusion of planting) provide visual and physical separation between the substation and residences to enable the enjoyment of their private property. Having regard for landscape and visual amenity enables social licence for the location of necessary infrastructure.

10. Landscape Mitigation Enables Rural Infrastructure

Existing Outlook to Rural Property to the South of Auckland from Private Property

Proposed Infrastructure (Solar Farm) on Rural Property South of Auckland on Land Immediately Adjacent Private Property

Proposed Infrastructure on Land Immediately Adjacent Private Property South of Auckland - Successfully Screened by Planting to Mitigate Adverse Visual Effects on Neighbouring Private Property

A consortium are proposing a solar farm to the South of Auckland to provide renewable energy. Because of its size it's northern edge will be located adjacent to around 10 residential dwellings.

Landscape mitigation recommendations (setbacks, and the inclusion of planting) provide visual and physical separation between the solar arrays and residences to enable the enjoyment of their private property. Having regard for landscape and visual amenity enables social licence for the location of renewable infrastructure for our future energy needs.

11. Predictable Decision-Making: Rejected Infrastructure

Existing Condition

Waiuku Wind Farm Proposed Condition

The proposed Waiuku Wind Farm was refused resource consent through the Fast Track Process in 2024, partially on landscape/visual grounds. Several residential dwellings would have been surrounded by wind turbines in close proximity (less than 1km away). The scale of adverse visual and landscape effects were considered to make the properties unlivable. A description that was accepted by the Independent Hearing Panel in forming their decision.

Through applying the landscape assessment criteria of Te Tangi a te Manu, The Aotearoa New Zealand Landscape Assessment Guidelines both the applicant's landscape architect and the landscape architect providing independent third party review were in agreement on the high degree of landscape effects. This provided clear direction for the decision makers to consider.

Tuia Pito Ora
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of Landscape Architects