



Ministry for the
Environment
Manatū Mō Te Taiao

Proposed National Planning Standards evaluation report 2018

Part 1 – Overall assessment

Evaluation for the proposed first set of National Planning Standards

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Context to this document

This document forms part of the *Evaluation Report for the Proposed National Planning Standards*. This document should be read in conjunction with the other documents that make up the report as a whole. The *Evaluation Report for the Proposed National Planning Standards* report is set out as follows:

Part 1 – Overall assessment

Part 2 – Individual standard assessments

Part 2A Plan and policy statement structure and format Part

2B Spatial planning tools and zone framework

Part 2C Definitions

Part 2D Noise and vibration metrics

Part 2E Electronic functionality and accessibility and mapping

Part 2F Tangata whenua provisions

Part 3 – Implementation

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1 Executive summary

The National Planning Standards (planning standards or standards) are a new tool in the national direction toolbox. They were introduced by the Resource Legislation Amendment Act 2017 (RLAA) to make plans and policy statements more useable, accessible and easier to prepare. The Resource Management Act 1991 (RMA) (section 58G) requires the first set of planning standards to be gazetted by April 2019.

This report assesses the proposed planning standards against section 32 of the RMA. The Ministry is notifying the proposed planning standards. We are consulting on the proposed planning standards from June to August 2018, during which time you can make submission. Before the standards are finalised the Ministry is required to prepare a report and recommendations on the submissions received.

The proposed National Planning Standards are different from plans and policy statements normally evaluated under section 32, as they do not contain content; that is, there are no objectives, policies methods or rules to evaluate. Therefore the planning standards will not lead to direct changes in environmental outcomes, but changes in processes. This means some parts of section 32 need to be adapted to assess the proposals in a format that is likely to be different from the ones people are used to seeing.

A Regulatory Impact Statement (RIS) has also been prepared for the National Planning Standards. It is a higher level document, which is required by Cabinet when making a decision on new regulations. The RIS looks at the planning standards as a holistic package rather than by individual standards as this report does. The RIS is available on the Ministry for the Environment [website](#) and should be read in conjunction with this report.

Part 1 provides an overarching introduction to the purpose of a section 32 evaluation report and discusses the legislative requirements that underpin it. This part also includes an overview of the process that the Ministry has undertaken to date to develop the National Planning Standards, including research, consultation and testing.

Part 2 of the evaluation report contains separate and more detailed evaluations of each of the standards. Each of these evaluations has been undertaken using a standard methodology, the purpose of which is to ensure that a consistent approach and level of rigour has been applied to each standard.

Part 3 of this report discusses the proposed implementation of the planning standards.

1.1 Economic analysis

An economic analysis for the planning standards was commissioned by the Ministry. This analysis is available from the Ministry's [website](#). This assessment looked at the overall package of the proposed planning standards and their benefits and costs.

This report concluded that the benefits of the proposed standards outweigh the costs with a benefit-cost ratio (BCR) of 1.53.¹ The BCR was calculated by taking the total benefits associated with implementing the standards and dividing this by the total costs.

¹ Assuming a five-year implementation period for councils from Gazetted in 2019. A benefit-cost ratio of above '1' means that the benefits outweigh the costs.

The report also found that the benefits outweigh the costs for each grouping of proposed standards. The report grouped the standards when the costs or benefits are shared and inseparable. The standards were grouped as follows.

Table 1: Grouping of standards to reflect shared and inseparable costs or benefits

Structure and form	Definitions	Electronic functionality and accessibility
<ul style="list-style-type: none"> ▪ Regional Policy Statement structure ▪ Regional plan structure ▪ District plan structure ▪ Unitary Plan structure ▪ Spatial planning tools ▪ Zone framework ▪ Home of National Direction 	<ul style="list-style-type: none"> ▪ Definitions ▪ Metrics 	<ul style="list-style-type: none"> ▪ Electronic functionality and accessibility ▪ eDelivery (mapping standards and data requirements) ▪ Presentation of plans in an ePlan format

1.2 Key preferred options

1.2.1 Structure and form

- 2A Plan and policy statement structure and format
Define a rigid structure for district plans and a more flexible structure for regional plans
- 2B Spatial planning tools and zone framework
Allow the use of 27 defined general zones, as well as the ability to use additional special purpose zones under certain circumstances. Set out requirements for how spatial planning tools (ie, precincts and overlays) must be used in plans.

1.2.2 Definitions

- 2C Definitions
Define 109 definitions that meet certain criteria.
- 2D Noise and vibration metrics
Includes metrics for the measurement of noise and vibration and indicates which New Zealand acoustical standards must be followed for measurement and assessment methodologies.

1.2.3 Electronic functionality and accessibility

- 2E Electronic functionality, accessibility and mapping
Baseline accessibility and functionality standards that all plans must achieve within 12 months. The main requirement is for all plans to become fully interactive online ePlans. Level 5 is functionality on the Electronic Accessibility and Functionality scale is required. The standards also specify data standards to support access to open source data and data transferability.
- 2F Tangata whenua provisions
Sets out headings and sections for tangata whenua provisions, including recognition of iwi/hapū, tangata whenua and local authority relationships, iwi and hapū planning documents and engagement

1.3 Implementation

The Minister considered the implementation timeframes of the planning standards and decided to override the legislative requirements in the Act by setting out specific timeframes within the planning standards themselves as enabled by the Act.

All standards except basic ePlanning requirements are required to be implemented within five years. The timeframes do allow a two-year extension of these timeframes for certain councils.

As required by the Act the planning standards are considered to be implemented once decisions on a plan change to implement the planning standards are notified.

The basic ePlanning requirement will need to be implemented within one year of the gazettal of the planning standards. This is because improving the online functionality and accessibility of RMA plans gives 'quick-win' efficiency gains for plan users, and improves national collation and comparison of plan data. These standards would not be overly onerous to implement, would not affect plan content, and will not have a significant flow-on effect on plan structure and format.

2 Background

2.1 Why are National Planning Standards being drafted?

Since the inception of the Resource Management Act 1991 (RMA) there have been discussions about standardising the format of plans, or having a model or template plan; however, the idea only became part of legislation in 2017 when the National Planning Standards (planning standards, or standards) were introduced as part of the Resource Legislation Amendment Act 2017 (RLAA).

RLAA introduced new sections 58B to 58J, to create a new type of national direction called National Planning Standards. The planning standards will form a standardised national framework for RMA plans and policy statements.

The planning standards are intended to improve consistency in plan and policy statement structure, format and content so they are easier to prepare, understand, compare and comply with. The standards are also intended to reduce the complexity and cost of creating plans and policy statements, and make plans and policy statements more user friendly.

The wide variation in plans has also meant that national directions such as National Environmental Standards (NES) and National Policy Statements (NPS) are often slowly, poorly and inconsistently implemented in plans and policy statements, affecting the effectiveness of these instruments.

As well as introducing the planning standards, the RLAA also requires the first set of planning standards to be developed. Section 58G(2) of the RMA states that the first set of planning standards must be gazetted by April 2019, and as a minimum include:

- a structure and form for plans, including references to relevant national policy statements, national environmental standards, and regulations made under the RMA
- definitions
- requirements for the electronic functionality and accessibility of plans.

This first set of National Planning Standards are an opportunity to standardise the basic elements of RMA plans and policy statements. They will enable councils and plan users to focus their resources on the matters that directly influence resource management outcomes.

2.2 Plan-making under the RMA

Plan-making was devolved to councils under the RMA in 1991 (as it was under the previous Town and Country Planning Act 1977), as they are usually best placed to make decisions on behalf of, and in conjunction with, their local communities. Each regional and district council is required to have in place a policy statement (for regions), and plans to manage the natural and physical resources in its region or district.

However, this has resulted in hundreds of plans that not only reflect local circumstances and community values in important content but also have a large variation in format and structure. The RMA plan-making process was a change from historic planning legislation, which required plans to be approved by central government and, at various times, prescribed key elements of plans.

When the RMA came into effect, some councils rolled over existing provisions from plans prepared under the former Town and Country Planning Act 1977, but many others took a first principles approach to developing their first RMA plan. The government anticipated some local variation would occur as councils tailored their plans to achieve sustainable management in their districts and regions.

An unanticipated outcome of this process was how much the core structural elements of the plans also varied. Over time, the degree of unnecessary variation has become more pronounced, with a greater proliferation of structures, zones and definitions.

The breadth and complexity of planning issues is increasing, and plans are becoming more expensive to prepare. While variation in how councils manage local issues is expected, it is questionable whether so much variation in the basic structure and form of plans, including definitions, is effective or efficient for individual plans or the planning system as a whole.

2.3 What issues are the National Planning Standards seeking to address?

2.3.1 Using a plan can be costly and time-consuming, particularly when using more than one plan

Plans currently have a high degree of variation in their structure, form and common content. People and businesses that cross a local authority border have to familiarise themselves with entirely different plans, each with its own structure, definitions and rule format. For regional or national organisations working with multiple plans, it can be costly and time consuming to figure out how each plan works, generating high investment risks and compliance costs.

For example, the location of relevant rules and definitions relating to houses varies from plan to plan. This is difficult for a local builder, based in Hamilton, who also builds houses in Cambridge, Ngaruawahia and Morrinsville. All these locations are within 25 minutes of Hamilton, but each town is in a different district, with a unique district plan.

A more efficient system would use the same format, zones, and definitions that apply to a new house, so that any local differences can be identified easily.

Similarly, national organisations experience major challenges working across all plans in the country either as an applicant or a submitter. They have to make submissions on the same issue on multiple plan changes (eg, definitions and utilities), and often appeal these to the Environment Court.

There are also administrative transitional costs to councils when planners move from one council to another. New staff need training to learn how the council's plan functions, and how the plan is set out.

Another part of this issue can be internal inconsistencies as a result of incremental chapter-by-chapter plan changes, resulting in different approaches to setting out plan provisions, making it difficult to read and to understand the plan's overall direction. These inconsistencies may require costly expert legal and planning advice to interpret.

Although effective use of ePlanning tools and ePlans would assist with some of these issues by making plans easier to use, the uptake of ePlanning tools have not been consistent around the country.

2.3.2 Inconsistent implementation of national direction

The Ministry's research² has found that national direction (including NPS, NESs and regulations) are not being implemented consistently across plans, and in some cases is implemented too slowly. Councils need to implement national directions in the context of their local environment. However, the effectiveness of national directions are reduced if the direction is implemented on different timeframes or in significantly different ways.

Inconsistent implementation of national direction also leads to complexity when trying to compare provisions across plans. This makes the effectiveness of the national direction difficult to assess.

2.3.3 Duplication of resources to develop content that does not affect local plan provisions

Some plan elements are not fundamentally influenced by local environmental conditions or community values. These elements could be developed at the national level and applied in all plans for a more efficient planning system. However, current practice is for every council to figure out their own way of drafting all elements of plans, resulting in unnecessary duplication of work. Using rule structure as an example, council staff will usually evaluate different styles of rule formats, review the rule structure in neighbouring council plans (in an effort to reduce cross-boundary impacts), consider political and managerial preferences within the council, and eventually develop a rule structure.

Unnecessary duplication of work is a significant issue given the escalating costs of preparing plans and managing the environment. The planning standards create an opportunity to streamline these structural elements of plans. This could help councils focus their resources on those matters that directly influence resource management outcomes in their area. This efficiency would be particularly useful for smaller councils with fewer resources.

2.3.4 Best planning practice is not routinely identified and applied

Best practice and innovation in plan-making is not being identified and adopted efficiently across regional and district plans. Leading-edge solutions and new approaches take time to be adopted in other plans, if they are adopted at all. For example, there is a wide variety of definitions of terms within plans, when one best practice definition could be identified and adopted.

The Ministry's research looked at 25 different district plans and found nine definitions of factory farming. The research also found that there are often a number of connected terms or synonyms for the same word. Factory farming is again a good example. The research found the following terms were all used:

factory farming, intensive farming, intensive farming activity, intensive indoor farming, intensive livestock farming, intensive livestock production, intensive rural production, intensive poultry farming, intensive piggery production activity.

As another example, New Zealand Standards (NZS) are usually referenced in plans to address a specific technical issue. However, issues arise when a New Zealand Standard is updated (to reflect best practice) but the plan references are not updated. The end result is costs, delays and frustration for people and organisations that use more than one plan, and for plan users

² See Appendix 2 for a list of research conducted and/or commissioned by the Ministry for the Environment on the National Planning Standards.

who have a district or regional plan that is complex and difficult to use, as well as sub-optimal outcomes as a result of using out-of-date standards.

2.3.5 Guidance alone is not sufficient to address variation problems

In the early 2000s there was significant investment in planning best practice resources to support quality planning outcomes, which centred on the development of the Quality Planning website. The Quality Planning website has been continually updated since it was launched. Other organisations such as universities, the New Zealand Planning Institute and the Resource Management Law Association also support best practice through advice, training and published examples of best planning practice.

Despite all of this work, variation still exists in the structural elements and content of plans. There is no doubt that many plans are logical, target local environmental issues, and function well in their district or region. However, the issues identified above are a result of the comparative variation **among** different plans. These issues create impacts for the planning system as a whole.

2.3.6 Monitoring plans is difficult

The varied structure and format of plans means that they are difficult to monitor and audit. When trying to assess how councils address an issue it can be difficult to find the chapter of the plan where an issue is addressed, and difficult again to identify the correct policies or rules.

This means that it is difficult to begin to properly monitor and track environmental outcomes when plans are so different. At present it is like comparing apples and oranges.

This is also particularly difficult with increasing amounts of national direction aimed at achieving positive environment outcomes. Progress towards environmental outcomes is difficult and costly to track and assess, therefore it can be hard to measure the effectiveness of National Policy Standards, National Environmental Standards and regulations.

2.4 Statutory context and scope

The sections below set out the statutory context for the Standards themselves, this evaluation report (under section 32) and plan making. These sections give context to the remainder of the report.

2.4.1 Resource Legislation Amendment Act 2017

The RMA was amended by the RLAA to introduce new sections 58B to 58J, creating National Planning Standards. The scope of the National Planning Standards is outlined in section 58C (Appendix 1) of the RMA. Standards can be prepared for many different elements of plans, including:

- objectives
- policies
- methods (including rules) and other provisions
- the structure and form of plans.

Standards can also be applied generally, to specific regions or districts, or to areas of New Zealand. The timeframes for implementation can also be set in the standards.

The intent of the National Planning Standards is to:

- provide greater national consistency in plans and policy statements
- reduce the complexity and cost of creating plans and policy statements
- improve user-friendliness of plans and policy statements.

Section 58C sets out the scope and contents of the National Planning Standards. The responsibility for the standards rests with the Minister for the Environment. The standards must be publically notified, and approved by the Minister. The Ministry for the Environment has the role of creating and drafting the standards as directed by the Minister.

Section 58G sets out what must be included in the first set of National Planning Standards. Section 58G states that:

“(2) The first set of national planning standards must include the following minimum requirements (the **minimum requirements**):

- (a) a structure and form for policy statements and plans, including references to relevant national policy statements, national environmental standards, and regulations made under this Act; and
- (b) definitions; and
- (c) requirements for the electronic functionality and accessibility of policy statements and plans.”

Although the Act sets out the minimum content that the first set of planning standards must include, it has been considered to be more efficient and effective to include standards that go beyond the minimum in this first set. One of the main reasons for this is to create a greater level of standardisation with the first set of standards that better reflects the level of resources required for implementation. The proposed standards being consulted on are:

- plan structure and form, including:
 - RPS, regional plan, district plan structure
 - format of plans
 - mapping standards
 - spatial planning tools
 - zone framework
 - home of national direction
- matters to be included in plans including:
 - definitions
 - metrics
 - tangata whenua provisions
- accessibility of plans online.

Under section 58I of the Act local authorities are required to implement the standards in their plans. The timeframes that are required for this implementation are discussed in Part 3 – Implementation of this report.

2.4.2 Section 32

Under section 58D(3)(a) the Minister must prepare an evaluation report in accordance with section 32 of the Act before approving the public notification of a draft National Planning Standard. The overarching purpose of section 32 of the RMA is to ensure that any proposed

RMA provisions are robust, evidence-based, and the best means to achieve the purpose of the Act. This section 32 evaluation report provides the rationale for the proposed standards, and should be read in conjunction with those provisions.

When carrying out a section 32 analysis of the National Planning Standards, an evaluation is required of how the proposal achieves the purpose and principles contained in Part 2 of the RMA. Section 5 sets out the purpose of the RMA, which is to promote the sustainable management of natural and physical resources.

The purpose of the RMA is to promote the sustainable management of natural and physical resources. Section 5 of the RMA states that sustainable management is:

“Managing the use, development and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic, and cultural well-being and for their health and safety while—

- (a) Sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and
- (b) Safeguarding the life-supporting capacity of air, water, soil and ecosystems; and
- (c) Avoiding, remedying, or mitigating any adverse effects of activities on the environment.”

In achieving this purpose, the Minister also needs to:

- recognise and provide for the matters of national importance identified in section 6
- have particular regard to other matters referred to in section 7
- take into account the principles of the Treaty of Waitangi referred to in section 8.

These matters are considered in the standard-by-standard analysis in part 2 of this report, as the content of the standards is more likely to be specifically relevant to the sections of the Act.

Section 32(1) of the RMA requires that, before the Minister publicly notifies any National Planning Standard, the Ministry for the Environment must examine:

- (a) the extent to which the objectives of the proposal being evaluated are the most appropriate way to achieve the purpose of this Act; and
- (b) whether the provisions in the proposal are the most appropriate way to achieve the objectives by—
 - i. identifying other reasonably practicable options for achieving the objectives; and
 - ii. assessing the efficiency and effectiveness of the provisions in achieving the objectives; and
 - iii. summarising the reasons for deciding on the provisions

The evaluation report must also contain a level of detail that:

- (c) corresponds to the scale and significance of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the proposal.

When assessing efficiency and effectiveness of the provisions in achieving the objectives of a proposed policy statement or plan the report must, under section 32 (2):

- (a) “identify and assess the benefits and costs of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the provisions, including the opportunities for—
 - i. economic growth that are anticipated to be provided or reduced; and
 - ii. employment that are anticipated to be provided or reduced; and
- (b) if practicable, quantify the benefits and costs referred to in paragraph (a); and
- (c) assess the risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the provisions.”

2.4.3 Section 18A

Section 18A of the RMA was introduced in 2017 by the RLAA. It includes procedural principles for those working under the Act. The section encourages best practice by people exercising functions under the Act.

Section 18A states:

18A Procedural principles

Every person exercising powers and performing functions under this Act must take all practicable steps to—

- (a) use timely, efficient, consistent, and cost-effective processes that are proportionate to the functions or powers being performed or exercised; and
- (b) ensure that policy statements and plans—
 - (i) include only those matters relevant to the purpose of this Act; and
 - (ii) are worded in a way that is clear and concise; and
- (c) promote collaboration between or among local authorities on their common resource management issues.

The section 18A content is relevant to the National Planning Standards, as the standards will promote many of these principles. In Part 2, where the standards are assessed one by one, the standards are assessed against section 18A if it is considered relevant.

2.4.4 National Policy Statements and National Environmental Standards

The National Planning Standards are required to give effect to National Policy Statements (NPSs) and be consistent with National Environmental Standards (NESs), regulations made under the RMA and water conservation orders (section 58C(1)).

NPSs state objectives and policies for matters of national significance that are relevant to achieving sustainable management. NESs are regulations that prescribe technical Standards, methods or other requirements for environmental matters.

The existing NPSs in effect at the time of drafting the planning standards are:

- National Policy Statement on Electricity Transmission 2008
- New Zealand Coastal Policy Statement 2010
- National Policy Statement for Renewable Electricity Generation 2011
- National Policy Statement for Freshwater Management 2014 (amended 2017)
- National Policy Statement on Urban Development Capacity 2016.

The following NESs were in effect as regulations at the time of drafting the National Planning Standards:

- National Environmental Standards for Air Quality 2004
- National Environmental Standard for Sources of Drinking Water 2007
- National Environmental Standards for Electricity Transmission Activities 2009
- National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health 2011
- National Environmental Standards for Telecommunication Facilities 2016.

The NES on Plantation Forestry is set to come into force on 1 May 2018.

All of the national direction has been considered when drafting the National Planning Standards. If a specific objective or provision contained in any of these directives is particularly relevant to a standard it will be discussed in more detail in the relevant section of Part 2 of this report. However, it is important to note that none of the planning standards explicitly give effect to these NPSs/NESs as the planning standards do not, in themselves, include content that will have a material effect on environmental outcomes.

2.4.5 Regional and territorial authority plans, policy statements and responsibilities

Sections 30 and 31 of the RMA set out the functions of regional councils and territorial authorities under the RMA respectively. Local authorities are also required under Part 5, subpart 3 of the RMA to prepare policy statements and plans.

Regional Policy Statements (RPSs) are required under section 60 of the RMA to be prepared by regional councils. They are intended to provide broad direction and a framework for resource management within their region. They include policies and methods to achieve integrated management of natural and physical resources within an entire region. The contents and purpose of regional policy statements is set out in sections 62 and 63 of the RMA.

Regional plans are optional (apart from Regional Coastal Plans) plans that focus on the use of natural resources in a region and include objectives, policies and rules (if any) to implement the policies. Regional Coastal Plans are required under section 64 of the RMA.

District plans are used by territorial authorities to assist them in carrying out their functions to achieve the purpose of the RMA. They contain objectives, policies and methods, including rules, and focus on land use and the effects of land use. District plans must not be inconsistent with regional plans and must give effect to NPSs.

Under section 79(1), councils must review a provision of an RPS or a regional/district plan if the provision has not been subject to a review or change during the previous 10 years.

3 Methodology and approach to evaluation

3.1 Structure of this evaluation report

This part, Part 1, of the section 32 evaluation report provides:

- an overarching introduction to the purpose of a section 32 evaluation
- the legislative requirements that underpin it
- an overview of the process that the Ministry has undertaken to date in developing the National Planning Standards, including research, consultation and engagement.

Part 2 of the evaluation report contains a separate and more detailed evaluation of each of the National Planning Standards (planning standards, or standards). Each of these evaluations has been undertaken using a standard methodology, the purpose of which is to ensure that a consistent approach and level of rigour has been applied to each planning standard.

Part 3 of this report discusses how the standards are proposed to be implemented.

The way the sections have been broken up is generally explained as follows:

Part 1 – Overall assessment

- Analysis of the relevant statutory, regulatory and policy context, including national planning instruments.
- Overview of the research undertaken on the overall project.
- Overview of the consultation on the overall project.
- Assessment of the scale and significance of the anticipated environmental, economic, social and cultural effects of the National Planning Standards.
- Evaluation of the proposed objectives, to determine their appropriateness in achieving the purpose of the RMA.
- Assessment of the proposed standards in regard to economic growth and employment.

Part 2 – Individual standard assessment

- Analysis of the relevant regulatory and policy context, including specifically relevant national planning instruments.
- Analysis of the statutory context **if there is additional context** not already covered in Part 1.
- Identification and analysis of the relevant issues relating to the topic, including the associated research commissioned, consultation undertaken, and information compiled.
- Evaluation of the standard and reasonably practical alternatives to achieve the proposed objectives, including the costs, benefits, effectiveness and efficiency of the approach and the risk of acting or not acting.

The evaluation sections of Part 2 of this report reflect the separate standards contained within the first set of National Planning Standards.

- 2A Plan and policy statement structure and format
- 2B Spatial planning tools and zone framework

- 2C Definitions
- 2D Noise and vibration metrics
- 2E Electronic functionality and accessibility and mapping
- 2F Tangata whenua provisions

Part 3 – Implementation

- Outlines how the planning standards are intended to be implemented and the timeframes councils are required to meet.
- A brief evaluation of the implementation options is included.

3.2 Scope of this evaluation report

This section 32 assessment is likely to differ from most standard council plan-making section 32 assessments. This is because:

- The first set of standards do not include a large amount of actual content (that is, objectives, policies or rules) that will become a part of a plan; the standards are more about structure and processes than content. This means that the majority of the standards will not lead to material changes in environmental outcomes on the ground, but will affect processes and efficiencies.
- The objectives of the standards (outlined below) will not end up in any regulation or plan and are simply guiding principles for the preparation of the standards.
- The section 58G of the Act requires that the first set of standards are produced and what they must include (do nothing/status quo is not an option in most cases).
- Some standards address issues that are not normally subject to a section 32 assessment (that is, the structure of a plan is not often assessed unless there is a large change for a council's current plan).
- As the planning standards will not directly affect material changes in environmental outcomes, the costs and benefits considered in this evaluation are not always the same as other section 32 reports. There are not always effects that are categorised as environmental, economic, social and cultural costs and benefits.

Although the first set of standards will not have a direct effect on environmental outcomes, they will create opportunity benefits for individual planning processes and the planning systems as a whole by enabling more resources to be directed to managing environmental effects instead of administrative matters.

A Regulatory Impact Statement (RIS) has also been prepared for the National Planning Standards. This is a higher level document and it looks at the planning standards as an holistic package rather than on an individual basis as this report does. The RIS is available on the Ministry for the Environment website, and should be read in conjunction with this report.

3.3 Evidence base – research, consultation, information and analysis undertaken

3.3.1 Research reports

The first step that the Ministry took in developing the first set of National Planning Standards was to carry out or commission over 20 research reports. These reports examined the different components of plans and identified points of commonality and difference. These reports are listed in Appendix 2 and formed the original evidence base for the proposed planning standards.

3.3.2 Initial scoping/think tank

Initial scoping of the planning standards was undertaken with resource management professionals between April and July 2015. This involved a Think Tank of a group of 8–10 external resource management professionals, who met four times over a two-year period to provide a ‘sounding board’ for Ministry staff while the concept of the planning standards was first being developed.

3.3.3 Discussion documents

Ten discussion documents on the National Planning Standards were prepared. These are available on the Ministry for the Environment’s website.³ They were released in April 2017 and feedback was sought. While these discussion documents were out for consultation, the National Planning Standards team held 16 workshops at 14 locations around the country. The workshops were run in conjunction with the New Zealand Planning Institute and the Resource Management Law Association.

All of the feedback from these discussion documents and workshops was fed into the drafting of the planning standards.

3.3.4 Pilot councils

The Ministry has set up a group of pilot councils (currently 28). This group has worked alongside the Ministry to support the testing of proposed the planning standards. This group has been sent draft standards and other information, and they have provided feedback whenever possible. Their feedback has been fed in to the planning standards package currently being proposed.

3.3.5 Professional advice

The practitioners’ drafting group was set up. This group consists of professional resource management practitioners including consultant planners, a senior council planner and an RMA lawyer. This group has four to five members depending on the meeting, and has been used to peer review the standards in detail and to support the Ministry’s drafting process. The group has also been used to support other parts of the process, including development of the template for this report.

³ www.mfe.govt.nz/rma/legislative-tools/national-planning-standards/developing-first-set-of-national-planning-1

3.3.5.1 Māori Advisory Group

The Māori Advisory Group is a group of eight Māori planning practitioners who have experience working with Māori planning issues. The group are from regions across the country and come from different backgrounds, including planning consultancies, local authorities, iwi planning organisations and experts in Mātauranga Māori. The group has been used to develop and test planning standards relating to tangata whenua and to provide a Māori perspective on other planning standards topics.

3.3.5.2 Other consultation and engagement

To support the robust development of the National Planning Standards, the Ministry's engagement programme has also included the following elements:

- meetings with:
 - other plan users, councils and stakeholders as requested
 - some councils, when there were workshops being held in their area, or the discussion of particular topics was considered necessary
 - a central government working group, with representatives from relevant agencies
 - a rural sector working group
 - the New Zealand Acoustical Society
 - an infrastructure providers working group
- online shared workspace where professionals are invited to discuss, share ideas, upload drafting for proposed standards
- presentations and workshops at the New Zealand Planning Institute and Resource Management Law association conferences.

Details of the consultation specific to each standard are included in Part 2 of this report.

4 Scale and significance of the proposal

Section 32(1)(c) of the Resource Management Act 1991 (RMA) states that a section 32 evaluation must contain a level of detail that corresponds to the scale and significance of the effects of the proposal.

For the purposes of section 32(1)(c), 'scale' essentially refers to the scale or reach of the issue (for example, geographic area), the anticipated size or magnitude of the expected effects from the proposal, or both. 'Significance' in this context refers to the importance or impact of the issue (on the environment and/or the community) that the proposal is intended to respond to, or the significance of the response itself (on the environment and the community). As previously noted, the planning standards as proposed will not lead to direct, material changes in environmental outcomes, but they will lead to changes in structures, processes and efficiencies. Therefore in this regard the significance of the proposal has been assessed in regard to its impacts on councils, communities and the public as a whole.

The scale and significance of the planning standards must be determined to guide the level of analysis required for the section 32 assessment.

The scale of the National Planning Standards is high as every council in the country will need to amend their Regional Policy Statements (RPSs), and regional and/or district plans. These plans are likely to need to be significantly amended to take into account the standards. This means that the scale of the change is large (that is, every plan across the whole country).

The planning standards are also highly significant as they will lead to plans across the country being more similar and easier to use; this will have the effect of reducing the time to produce these plans, and the costs for some users to engage with them.

Overall it is considered that the National Planning Standards are of a large scale and of high significance. However there are individual standards or components of standards that have a lower scale and significance. The scale and significance of each standard is addressed in the relevant chapter of this report and the level of analysis reflects the scale and significance of the component being considered.

Accordingly a detailed assessment of the planning standards has been identified as appropriate and is provided in Part 1 and Part 2 of this report.

5 Evaluation of the objectives of the National Planning Standards

5.1 Policy objectives

The National Planning Standards (planning standards or standards) do not contain objectives that will become a part of plans, as previously noted in section 3.1. The majority of the planning standards do not dictate the content of plans and therefore they will not lead to any direct, changes in environmental outcomes. The bulk of the standards are focused on process and efficiencies.

The policy objectives of the planning standards were created so the standards could be assessed for appropriateness. They are a set of principles that outline what the planning standard should achieve and assist in testing reasonable alternatives to those standards proposed. These objectives were developed based on the requirements of the Resource Management Act 1991 (RMA), and the problems that the planning standards are trying to solve.

The Minister for the Environment is required to prepare and approve this first set of National Planning Standards by April 2019, to meet the requirements of section 58G (1) of the Act. As noted in section 2.3.1, section 58G (2) sets out the minimum content of the planning standards, therefore these parts of the standards are not matters of discretion.

The proposed National Planning Standards are required to be consistent with the requirements of the Act, including:

- Section 18A – Procedural principles
- Section 58B – Purpose of planning standards
- Sections 58B–58K – Provisions relating to the National Planning Standards
- Sections 62, 67 and 75 – Contents of plans

Section 58B of the RMA states that the purposes of the National Planning Standards are:

- (a) to assist in achieving the purpose of this Act; and
- (b) to set out requirements or other provisions relating to any aspect of the structure, format, or content of regional policy statements and plans to address any matter that the Minister considers—
 - (i) requires national consistency;
 - (ii) is required to support the implementation of a national environmental standard, a national policy statement, a New Zealand coastal policy statement, or regulations made under this Act;
 - (iii) is required to assist people to comply with the procedural principles set out in section 18A.

Section 58D(2) also states the following:

- (2) In preparing or amending a national planning standard, the Minister may have regard to—
 - (a) whether it is desirable to have national consistency in relation to a resource management issue:

(b) whether the national planning standard supports the implementation of national environmental standards, national policy statements, a New Zealand coastal policy statement, or regulations made under this Act:

(c) whether the national planning standard should allow for local circumstances and, if so, to what extent:

(d) whether it is appropriate for the national planning standard to apply to a specified district, region, or other parts of New Zealand rather than nationally:

(e) any other matter that is relevant to the purpose of the national planning standard.

The sections above can in some ways be broadly interpreted as objectives for the National Planning Standards, however these requirements do not give sufficient direction for the assessment of alternative approaches to the planning standards.

The *Introduction to the National Planning Standards* discussion document stated that the key outcomes of the National Planning Standards are:

1. less time and resources are required to prepare and use plans
2. plan content is easier to access, and relevant content easier to find
3. national direction is consistently incorporated in plans, resulting in better implementation on the ground
4. councils focus their resources more on plan content that influences local resource management outcomes and is important to the community
5. good planning practice is applied quickly across councils through the National Planning Standards.

Therefore, the first three objectives outlined been devised with each of these driving forces in mind. The fourth objective is based on the practicality and feasibility of implementation of the standards which is a critical success factor for the standards as a whole.

The objectives of the National Planning Standards are listed below. The bullet points help clarify the objectives meaning.

Objective 1: An appropriate level of standardisation is achieved for matters that don't need local variation:

- avoid duplication of effort
- ensure that only matters that do not need local input are included in the standard
- standardises how National Direction is represented and implemented in plans
- aims to result in standards where the effort put in by councils to implement the standards is commensurate with the level of standardisation achieved

Objective 2: Improve the accessibility and usability of plans and policy statements:

- plans are easier to access
- plans are easier to understand
- electronic functionality is used to improve accessibility wherever possible.

Objective 3: Improve plan-making baseline performance:

- shorter timeframes
- less resource intensive
- more focus on local outcomes
- assist in good practice being adopted in a more timely manner.

Objective 4: Implementation of the standards is practical and feasible, while taking into account the:

- resource intensity needed to implement the standards
- capacity and capability of Councils to implement the planning standards
- efficiency of central government having ownership, associated ongoing responsibility and maintenance costs for this level of standard.

5.2 Evaluation of objectives

Section 32 of the RMA requires that the evaluation examine the extent to which the objectives of the proposal are the most appropriate way to achieve the purpose of the Act. The purpose of the RMA is to promote the sustainable management of natural and physical resources. As the objectives of the National Planning Standards will not result in a direct, material change in environmental effects on the ground (as they will not be included in plans) it is difficult to explicitly relate them back to the purpose of the RMA. Instead the evaluation aims to assess the effectiveness of the options for each planning standards against the objectives. However, the standards present an opportunity benefit to councils in that more efficient and consistent plan-making will allow councils to focus more on environmental outcomes, not process matters.

Each objective is evaluated against the criteria of relevance, usefulness, reasonableness and achievability below. This approach is broadly derived from the Ministry for the Environment's A guide to section 32 of the Resource Management Act 1991.⁴

Alternative objectives have not been considered in this report, as the objectives do not form part of the standard. The objectives are being used to assess the proposed standards against alternative options and ensure that the standards are efficient and effective.

Table 2: Evaluation of objectives

Objective 1: An appropriate level of standardisation is achieved for matters that don't need local variation

- avoid duplication of effort
- ensure that only matters that do not need local input are included in the standard
- standardises how National Direction is represented and implemented in plans
- aims to result in standards where the effort put in by councils to implement the standards is commensurate with the level of national plan standardisation achieved.

Relevance

The objective ensures that the standards will assist councils to undertake their functions under sections 30–31.

Assists councils to undertake their functions under sections 62 (contents of RPS), 67 (Contents of Regional Plans) and 75 (Contents of District Plans), by requiring that the planning standards avoid the duplication of effort between councils.

The purpose of the National Planning Standards as set out in section 58B(ii) states that the planning standards can include matters that the Minister considers are required to support the implementation of a national environmental standard, a national policy statement, a New Zealand coastal policy statement, or regulations made under the RMA. Therefore this objective requires the standard to give effect to higher order planning instruments such as NPS, and not be inconsistent with NES.

Consistent implementation of National Direction would assist national companies, government agencies and consultants when being involved with council plans that could lead to more efficient and cost-effective processes

⁴ www.mfe.govt.nz/sites/default/files/media/RMA/guide-to-section-32-of-resource-managemnt-amendment-act-1991.pdf

(section 18A (ii)) as they will have certainty about which rules apply.

Standardising matters that are appropriate to be standardised nationally assists the public, government agencies, national companies and consultants when being involved with council plans that could lead to more efficient and cost-effective processes (section 18A (b) (ii)) .

Ensuring that matters that do need local variation are kept within the decision-making ability of local authorities meets the developed nature of decision-making under the Act (sections 30 and 31).

Usefulness

This objective is useful as it provides clear guidance when considering the appropriateness of planning standards.

Reasonableness

The objective is reasonable as it is likely to reflect what most parties expect the planning standards to achieve.

Achievability

The planning standards are able to achieve this objective, as it reflects the purpose that the first set of planning standards has been focused on achieving. Future sets of standards are likely to be more thoroughly tested by this objective.

Objective 2: Improve the accessibility and usability of plans and policy statements:

- plans are easier to access
- plans are easier to understand
- electronic functionality is used to improve accessibility wherever possible.

Relevance

Assists the public, companies and consultants when being involved with council plans, as they will be easier to access and understand, which could lead to more efficient and cost-effective processes (section 18A (b) (ii)).

Will assist councils in using “efficient, consistent, and cost-effective processes” as required under section 18A (a) by reducing the time and cost needed to carry out plan changes.

Meets the requirements of section 58C scope and contents of National Planning Standards that states that the standards may “(f) include requirements that relate to the electronic accessibility and functionality of policy statements and plans”.

Usefulness

This objective provides clear guidance when considering the appropriateness of planning standards and alternatives.

Reasonableness

The objective is reasonable, as it reflects what most parties expect the planning standards to achieve. This objective notes that the planning standards are a way to assist with plans as a whole becoming easier to understand and interact with.

Achievability

This objective can realistically be achieved through the National Planning Standards.

Objective 3: Improve plan-making baseline performance:

- shorter timeframes
- less resource intensive
- more focus on local outcomes
- assisting in adopting good practice in a more timely manner.

Relevance

Will assist councils in using “efficient, consistent, and cost-effective processes” as required under section 18A (a).

Assists the public, companies and consultants when being involved with council plans, as they will be prepared faster with fewer resources, which will make the processes more efficient and cost effective (section 18A (b) (ii)).

Will assist with the collaboration between and among councils on common resource management matters as it will be easier to adopt best practice changes when plans are more uniform (section 18A (c)).

Assists councils to undertake their functions under section sections 30–31 by allowing them to focus on local outcomes and adopting best practice in a timely manner.

Usefulness

This objective provides clear guidance when considering the appropriateness of planning standards and alternatives.

Reasonableness

This objective notes that the planning standards are a way to assist with plans as a whole becoming easier to understand and interact with.

It is considered reasonable to try to ensure the implementation of best practice in a timely manner. Having a standardised structure and form of plans will mean that best practice from either other councils or central government can fit for easily into plans.

Achievability

This objective can realistically be achieved through the National Planning Standards.

Objective 4: Implementation of the standards is practical and feasible, while taking into account the:

- resource intensity needed to implement the planning standards
 - capacity and capability of Councils to implement the planning standards
 - efficiency of central government having ownership, associated ongoing responsibility and maintenance costs for this level of standard.
-

Relevance

This objective is relevant as it enables the consideration of resource constraints on local and central government which may affect the ability of parties to implement and maintain the Standards.

Usefulness

This objective provides clear guidance when considering the appropriateness of planning standards and alternatives.

Reasonableness

The objective is considered reasonable, as without this objective the first set of planning standards may require more resource and capability than councils and central government have available. It is recognised that any form of standard will test capability and capacity, and therefore it is important to achieve as much of a balance as possible between the costs and benefits of the planning standards.

Achievability

It is recognised that any form of standard will test the capability and capacity of councils when implementing the planning standards; however this objective will assist in achieving the reasonable balance in this regard.

5.3 Overall assessment of objectives

Although each objective has been considered individually above, section 32 encourages a holistic approach to assessing objectives. This recognises that objectives often work together, interrelate and have overlapping ways of achieving the purpose of the RMA.

The objectives work together to create a clear picture of what the first set of National Planning Standards is intended to achieve. The objectives reflect more than the bare minimum required

by the RMA, as the bare minimum does not represent the best benefit for the cost and amount of work put in for councils to implement the planning standards.

The objectives of the National Planning Standards are considered to be the most appropriate way to achieve the purpose of the planning standards stated in the RMA. The objectives are practical and achievable and they represent the expectations of the public and stakeholders in regard to the planning standards. The objectives are considered to be relevant, useful, reasonable and achievable.

All of the options for the planning standards have been assessed against these objectives in Part 2 of this report.

6 Economic analysis

6.1 Overall benefits and costs

As noted above, the Ministry for the Environment commissioned an economic analysis of the proposed planning standards. This analysis, *Economic Evaluation of the Introduction of the National Planning Standards* (Castalia, 2018⁵), was carried out by Castalia and is available on the Ministry's [website](#).

The Castalia report, like the Regulatory Impact Statement (RIS), assessed the planning standards as a package, not as individual standards as this report does.

The report concluded that the benefits of the proposed planning standards outweigh the costs with a benefit-cost ratio (BCR) of 1.53.⁶ The BCR was calculated by taking the total benefits associated with implementing the standards and dividing this by the total costs.

The Castalia report also noted that the benefits outweigh the costs for each grouping of proposed standards. The standards were grouped when the costs or benefits were shared and inseparable. Castalia states:

“For example, council staff time (a cost) is required to implement every standard. In certain cases, the shared cost or benefit cannot be disaggregated accurately, such as the staff time required to implement those Standards affecting a plan’s structure and form. This is because the council process to incorporate the changes is shared, making it impractical to accurately specify how the time is split between the Standards.”

The report placed planning standards into the following groups.

Table 3: Grouping of standards to reflect shared and inseparable costs or benefits

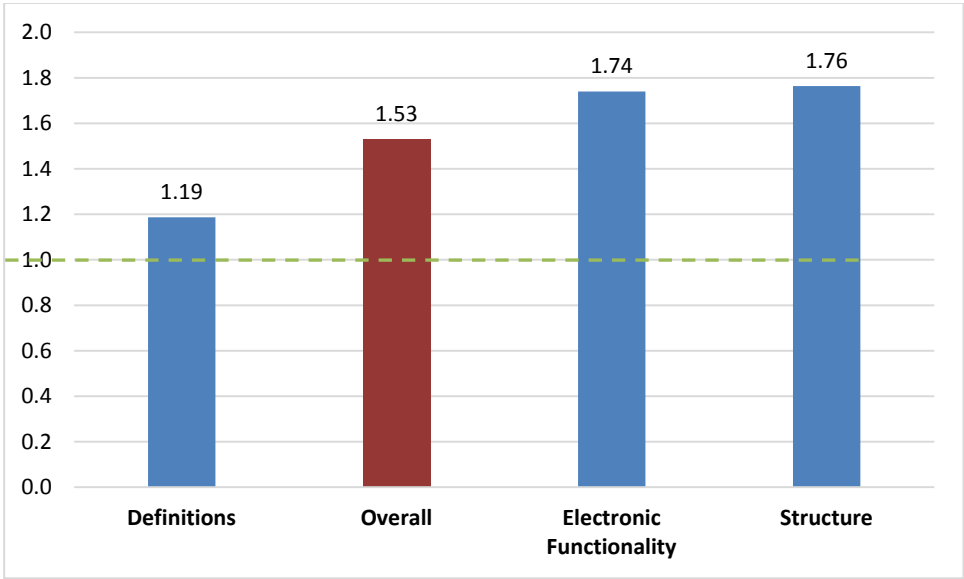
Structure and form	Definitions	Electronic functionality and accessibility
<ul style="list-style-type: none"> Regional Policy Statement structure Regional plan structure District plan structure Unitary plan structure Spatial planning tools Zone framework Home of National Direction 	<ul style="list-style-type: none"> Definitions Metrics 	<ul style="list-style-type: none"> Electronic functionality and accessibility eDelivery (mapping standards and data requirements) Presentation of plans in an ePlan format

- When the groupings were considered, assuming a five-year period for implementation from 2019 gazettal, each category achieved a BCR of more than one (meaning the benefits outweigh the costs for each proposed planning standard):
- The structure and form standard has the highest BCR of 1.76.
- The definitions standard has the lowest BCR of 1.19.
- Electronic functionality has a BCR of 1.74.

⁵ Castalia. 2018. *Economic Evaluation of the Introduction of the National Planning Standards*. Prepared for the Ministry for the Environment. Wellington: Ministry for the Environment.

⁶ Assuming a five-year implementation period for councils from gazettal in 2019. A benefit-cost ratio of above 1 means that the benefits outweigh the costs.

Figure 1: Cost-Benefit ratio of the three standard categories⁷



6.2 Assessment of economic growth and employment

Section 32(2)(a) of the RMA requires that:

- “(2) An assessment under subsection (1)(b)(ii) must—
- (a) identify and assess the benefits and costs of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the provisions, including the opportunities for—
- (i) economic growth that are anticipated to be provided or reduced; and
- (ii) employment that are anticipated to be provided or reduced; and...”

When preparing their report, Castalia addressed this issue. They outline their full assessment of this issue in section 4.7 of their report.

Castalia concluded that the standards will lead to a short-term relative stimulus to council planning sectors, and a long-term net stimulus to productivity and employment. The standards will also create longer-term productivity gains across sectors.

“Over the lifetime of the analysis the Standards lead to \$62.4 million in benefits, and \$40.8 million in costs. That equates to a net value of \$21.6 million over a 30-year period once total costs are deducted from the total benefits. This represents new productivity gains across sectors, and a permanent long-term increase in associated employment.⁸”

⁷ Castalia. 2018. *Economic Evaluation of the Introduction of the National Planning Standards*. Prepared for the Ministry for the Environment. Wellington: Ministry for the Environment.

⁸ Castalia. 2018. *Economic Evaluation of the Introduction of the National Planning Standards*. Prepared for the Ministry for the Environment. Wellington: Ministry for the Environment.

Appendix A: Statutory context

Section 58C

(1) National planning standards must—

- (a) give effect to national policy statements; and
- (b) be consistent with—
 - (i) national environmental standards; and
 - (ii) regulations made under this Act; and
 - (iii) water conservation orders.

(2) National planning standards may specify—

- (a) any of the matters specified in section 45A(2) and (4) (which applies as if the national planning standard were a national policy statement):
- (b) objectives, policies, methods (including rules), and other provisions to be included in plans:
- (c) objectives, policies, methods (but not rules), and other provisions to be included in regional policy statements:
- (d) that a local authority must review, under section 128(1), a discharge, coastal, or water permit, or a land use consent required in relation to a regional rule.

(3) For the purpose of subsection (2)(b), national planning standards may include any rules that could be included in any plan under *section 68, 68A to 70A, 76, or 77A to 77D*.

(4) A national planning standard may also—

- (a) specify the structure and form of regional policy statements and plans:
- (b) direct local authorities—
 - (i) to use a particular structure and form for regional policy statements and plans:
 - (ii) to include specific provisions in their policy statements and plans:
 - (iii) to choose from a number of specific provisions to be included in their policy statements and plans:
- (c) direct whether a national planning standard applies generally, to specific regions or districts, or to other parts of New Zealand:
- (d) include time frames for local authorities to give effect to the whole or part of a national planning standard, including different time frames for different local authorities:
- (e) specify where local provisions must or may be included in regional policy statements and plans:
- (f) include requirements that relate to the electronic accessibility and functionality of policy statements and plans.

(5) National planning standards may incorporate material by reference, and *Schedule 1AA* applies for the purposes of this subsection as if references to a national environmental standard, national policy statement, or New Zealand coastal policy statement included references to the national planning standards.

(6) National planning standards may, for ease of reference, set out (or incorporate by reference) provisions of a national policy statement, New Zealand coastal policy statement, or regulations (including a national environmental standard), but those provisions do not form part of a national planning standard for the purposes of any other provision of this Act or for any other purpose.

Appendix B: National Planning Standards research

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- 4Sight. 2016a. *Compatibility of National Direction Instruments with NPT*. Wellington: Ministry for the Environment.
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- Beca Ltd. 2014. *Potential National Standardisation of Residential Activities under the Resource Management Act*. Wellington: Ministry for the Environment (original report produced for the New Zealand Treasury).
- Beca Ltd. 2016a. *Review of Regional Policy Statements*. Wellington: Ministry for the Environment.
- Beca Ltd. 2016b. *Review of Structure and Format of Regional Plans, and Interaction with District Plans*. Wellington: Ministry for the Environment.
- Beca Ltd. 2017. *Regional Rules Structure and Format*. Wellington: Ministry for the Environment.
- Boffa Miskell. 2015a. *Interface between Regional and District Definitions*. Wellington: Ministry for the Environment.
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- Castalia. 2018. *Economic Evaluation of the Introduction of the National Planning Standards*. Prepared for the Ministry for the Environment. Wellington: Ministry for the Environment
- GHD. 2015. *Resource Management Plan Metric Research*. Wellington: Ministry for the Environment.
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