



## FEEDBACK ON THE EXPOSURE DRAFTS OF CHANGES TO THE NATIONAL POLICY STATEMENT FOR FRESHWATER MANAGEMENT AND NATIONAL ENVIRONMENTAL STANDARDS FOR FRESHWATER

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## Introduction

1. Te Kokiringa Taumata | New Zealand Planning Institute (NZPI) welcomes the opportunity to present this feedback to the Ministry for the Environment (MfE) on the exposure draft of proposed changes to the National Policy Statement for Freshwater Management (NPS-FM) and the National Environmental Standards for Freshwater (NES-F). NZPI supports changes to resolve issues with implementation of the current wetland regulations.
2. NZPI acknowledges MfE is seeking feedback on whether the drafting of the proposed changes is clear, and if there are any unintended consequences arising from the drafting. As the professional body for practicing planners, our key interest is ensuring an implementation lens is applied to changes to policy and regulations. We offer a number of solutions to improve drafting and avoid unintended consequences, and therefore improve implementation of the NPS-FM and NES-F.
3. In summary, the key issues we identify and discuss in this submission relate to:
  - a. The inappropriate application of the freshwater regulations to wetlands in the Coastal Marine Area (CMA).
  - b. Implementation issues with the consent pathways for quarrying, mining, urban development, and landfills and cleanfills.
  - c. Unintended consequences from changing 'river' to 'river bed'.
  - d. Interaction with other national direction.
4. A summary of all our recommendations for amendments to the exposure draft of the NPS-FM and NES-F is included at the end of this submission.

## Definition of 'natural wetland'

5. NZPI supports the changes made to the definition of 'natural wetland'. These changes will improve the clarity of the definition, which will assist with implementation. In particular, the replacement of 'improved pasture' with 'pasture' will be of benefit, along with the direction on how to identify wetlands in areas of pasture. However, we note that 'improved pasture' has not been replaced with 'pasture' in all instances, and we encourage MfE to do a double check of this term throughout the NPS and NES. For example, the definition of 'vegetation clearance' in the NES has a list of exclusions in subsection (c), and limb (v) still reads "the grazing of improved pasture within the relevant setback from a natural wetland". The word 'improved' needs to be removed from this definition to ensure consistency with the changes elsewhere in the NES and NPS.
6. NZPI supports the submission of Te Uru Kahika, Regional Sector of Local Government, that wetlands within the coastal marine area (CMA) should be explicitly excluded from the NES-F, as they are excluded from the NPS-FM. This is a significant implementation issue, confirmed by the High Court, that has arisen from what appears to be an unintended consequence of the original drafting of the NES-F.



7. The Te Uru Kahika submission clearly sets out the reasons why the NES-F should not apply to wetlands within the CMA. In summary, these include:
  1. No rationale has been provided for the inclusion of coastal wetlands in the NES-F
  2. There is considerable uncertainty regarding how to delineate coastal wetlands
  3. Coastal wetlands require a different management regime to inland wetlands
  4. Including wetlands within the CMA in the NES-F is imposing unnecessary costs on Councils and applicants for coastal activities
  5. The NES-F is inconsistent with the New Zealand Coastal Policy Statement and other national direction.
  
8. Rather than take the opportunity of a review of the NES-F to correct the error, MfE propose deferring any correction until further work is done on how to fix it. With respect, there is no need for this approach. If there is no section 32 analysis of the NES-F applying to wetlands within the CMA, and no support in the planning hierarchy for freshwater standards to apply to wetlands within the CMA (this is not a matter within scope of the NPS-FM and the NES-F is inconsistent with the New Zealand Coastal Policy Statement), then it is imperative that the NES-F is amended to clarify that it does not apply to wetlands within the CMA. The additional work should continue, and should be work that informs a section 32 analysis and an issue-based solution for the management of wetlands within the CMA, which takes account of and gives effect to other national direction.
  
9. NZPI considers that the fix can be very simple and does not require a new definition of 'coastal wetland' (which is the solution discussed in the supporting document 'Managing our wetlands: Policy rationale for exposure draft amendments 2022 (Policy Rationale document)'). All that is required is an exclusion for wetlands in the CMA, which is much easier to achieve than a new definition of coastal wetlands and has already been done in the NPS-FM. It is not at all clear why the NPS-FM uses 'natural inland wetland' and the NES-F uses 'natural wetland' – this appears to be the source of the unintended consequence. This fix (the exclusion for wetlands in the CMA from the NES-F) could be done in two ways:
  - a. The preferred way is by adding a clause to the exclusions listed in the definition of 'natural wetland' in the NPS-FM, which states that a natural wetland means a wetland that is not 'within the Coastal Marine Area'. This would change the NES-F because the NES-F refers to the NPS-FM for the definition of 'natural wetland'.

This change would make the definition of 'natural inland wetland' in the NPS-FM (and within the NES-F) redundant and it could be deleted, along with the deletion of the word 'inland' each time the term 'natural inland wetland' is used in the NPS-FM (20 deletions, excluding the definition) and in the NES-F (11 deletions excluding the definition). This would have the positive effect of slightly reducing the number of words in the NPS-FM – 'natural wetland' only appears in the definitions section and is not used anywhere else in the NPS-FM, its only purpose being that it is referred to in the definition of 'natural inland wetland'. There is an efficiency gain by combining the two definitions into one.



- b. The same result could also be achieved by adding the word 'inland' to each use of the term 'natural wetland' in the NES-F. That would result in 157 additions of the term 'inland' – the number of times 'natural wetland' appears in the NES-F, excluding the definition. If this option is selected, the definition of 'natural wetland' could be deleted from the NES-F as it would no longer be needed. This option is considered less ideal than (a) because it requires more changes to be made.

### **Consent pathway for quarrying**

10. NZPI has identified an implementation issue with the consent pathway for quarrying. MfE's supporting Policy Rationale document states that the policy intent is to provide a consent pathway for the extraction aspect of quarrying, which does not have flexibility as to location, but not necessarily the ancillary activities such as buildings and roads, which do have flexibility as to location. The Policy Rationale document concludes that the functional need test (a functional need to locate within a natural inland wetland) will apply to both the extraction and the ancillary activities, which will achieve the distinction sought (because the extraction will meet the functional need test and the ancillary activities will not). However, Clause 3.22(d) of the NPS-FM, which is the exception for quarrying, only applies the functional need test to extraction (see limb (iii)).
11. There is a related flaw in the Policy Rationale document, which concludes that there is no need for a definition of quarry in the NPS-FM because the ordinary meaning of the word is sufficient. This ignores the fact that Clause (3) of section 1.4 (Interpretation) of the NPS-FM states that terms defined in the National Planning Standards have the meaning in those standards, unless otherwise specified. The NPS-FM does not specify otherwise. Therefore, the National Planning Standards definition of quarry and quarrying activities (because quarrying activities is used in the definition of quarrying) apply, which encompasses all activities associated with quarrying, including processing, transport, sale, and deposition of overburden. As drafted, this means the NPS-FM applies the exception to the requirement to avoid the loss of extent of natural inland wetlands and to protect their values to both extraction and all other quarrying activities, with the alternative effects management hierarchy applying to extraction and all other activities, but the functional need test only applying to the extraction part of the activity.
12. There are two possible solutions to this implementation issue:
  - a. Delete the word 'extraction' in 3.22(1)(d)(iii) and replace it with 'quarrying activities' so that the limb captures all the activities in the National Planning Standards definition and therefore applies the functional need test to all quarrying activities. This would ensure that the functional need test applies to all quarrying activities, in line with the policy intent. A consequential change should be considered in the NES-F in order to provide clarity, by changing 'quarrying' in Regulation 45A to 'quarrying activity', along with a cross-reference definition to the National Planning Standards in Regulation 3 Interpretation for 'quarrying activity' (to mirror the cross-reference definitions for other National Planning Standard terms used in the NES-F).
  - b. Provide an exception definition for 'quarry' in the NPS-FM, and a corresponding cross-reference definition in the NES-F. This would specify that for the purposes of the NPS-FM



and NES-F, 'quarry' means extraction of aggregate only, and 'quarrying' has a corresponding meaning. This would specifically exclude ancillary quarrying activities from consideration under the exception and leaves these ancillary activities to be dealt with under existing regional and district plans. There are practical advantages to treating all related quarrying activities together under the same regulatory framework, and for this reason, option (a) is preferred by NZPI.

### **Consent pathway for mining**

13. The use of different terminology in the NPS-FM and NES-F for the mining consent pathway raises an implementation issue. There is a similar flaw in the Policy Rationale document for how mining is defined as is discussed above for quarrying. Contrary to what is stated in the Policy Rationale document, 'mining' is a defined term in the NPS-FM. This is because Clause (2) of Section 1.4 (Interpretation) of the NPS-FM states that terms defined in the RMA have the meaning in the Act, except as otherwise specified. The RMA defines 'mining' by reference to the Crown Minerals Act, and so the Crown Minerals Act definition applies to the NPS-FM (as there is no specification otherwise). The definition of 'mining' in the Crown Minerals Act is much more targeted than the definition of 'quarry' in the National Planning Standards, and it does not include 'mining operations', which is a separately defined term.
14. It is good planning practice to use defined terms in documents and legislation when they exist. However, the NPS-FM uses the phrase "extracting any mineral in its natural state from the land", rather than 'mining', in Section 3.22(1)(e). The NES-F does use the term 'mining', although has no cross-reference definition to the term 'mining'. Both the NPS-FM and the NES-F should use the same terminology for all provisions that relate to the consent pathway for mining. "Extracting any mineral in its natural state from the land" is part of the definition of 'mining', and it is not clear why only part of the definition is used in the NPS-FM.
15. To clarify the relationship between the provisions of the NPS-FM and NES-F for the mining consent pathway, NZPI recommend the following changes:
  - a. Deleting the phrase "extracting any mineral in its natural state from the land" and similar phrases used in Section 3.22(1)(e) of the NPS-FM and replacing them with the word 'mining'.
  - b. Adding a cross-referencing definition of 'mining' to the NES-F that refers to the RMA definition.

### **Consent pathway for urban development**

16. NZPI has identified four implementation issues with the consent pathway for urban development, relating to:
  - a. A mismatch between matters for discretion and policy direction.
  - b. An overly complicated test for urban development.
  - c. The utility of the 'no practicable alternatives' test.
  - d. Operative v proposed zoning.



*Matters of discretion*

17. There is a mismatch between the matters of discretion for urban development activities in the NES-F and the policy direction provided for these activities in the NPS-FM (that will be transferred to regional plans). The NES-F identifies a number of activities for the purpose of constructing urban development within or close to natural inland wetlands that are restricted discretionary activities. The matters of discretion for these activities are listed in Regulation 56 of the NES-F. As a restricted discretionary activity, only those matters listed can be considered in the assessment of applications, including against the policy framework. For a policy to apply to a restricted discretionary activity, the policy needs to relate to a matter of discretion. It is our assessment that the specific direction in the policy in Section 3.22(1)(c) for urban development that is to be included in regional plans is not caught by the general list of matters in Regulation 56 of the NES-F. To remedy this situation, NZPI recommends that a specific list of matters that mirrors the policy direction is included at Regulation 45C(5) of the NES-F. The matters could be worded as follows, or in a similar manner, and should apply in addition to the general matter identified in Regulation 56 of the NES-F:
- The extent to which the activity contributes to a well-functioning urban environment
  - Whether the activity occurs on land identified for urban development, and not on rural zoned land
  - Alternative locations considered for the activity and the extent of adverse effects on natural inland wetlands at the alternative locations (*subject to comments below*)
  - The maintenance and management of aquatic offsetting and/or aquatic compensation over time.

*Urban development*

18. NZPI considers that the ‘test’ in the policy for urban development is overly complicated and uncertain and will present a hurdle to smooth implementation. The test is currently worded: “the activity is necessary for the purpose of urban development that contributes to a well-functioning urban environment (as defined in the National Policy Statement on Urban Development)”. In this context, ‘necessary’ is a very high bar to set and will be difficult to prove. ‘Contributes’, on the other hand, is quite a weak policy direction and would not be difficult to prove. The definition of ‘well-functioning urban environment’ is itself long and complex, which adds further uncertainty to the test. NZPI recommend simplifying the test to ‘the activity contributes to a well-functioning urban environment’, which is still a subjective test but much less complicated.

*‘No practicable alternatives’ test*

19. NZPI does not see the utility of the ‘no practicable alternative location’ test in the urban development policy. This test does not work as well in the context of urban development as it does in the context of a large piece of infrastructure such as a landfill. Activities for urban development that happen on urban zoned land are likely to be considered at a site scale, not at a district scale. For example, discharge of stormwater associated with a subdivision. The location for the discharge is limited by the extent of the subdivision. If there is a natural inland wetland in the area of the subdivision, there will be no ability to choose another site for the discharge of stormwater from the subdivision, as the subdivision is located where it is. At a site scale, the ‘no practicable alternative location’ test seems somewhat redundant.



20. Related to this, the strictness of the policy tests for urban development activities does not accord well with the restricted discretionary activity status for urban development activities. The policy issue identified in the Policy Rationale document is that councils “are having significant difficulties balancing the requirements of the NPS-UD with those of the wetland regulations”. The solution to that problem in the proposed changes is a restricted discretionary consent pathway for urban development activities, which effectively provides priority to urban development over wetland protection. That being the case, the supporting policy should be supportive and not over-complicate the consideration of the restricted discretionary activity. The policy is not a gateway test (as suggested in the Policy Rationale document) as it does not support a non-complying activity. NZPI’s recommendation to achieve the policy intent is to delete the ‘no practicable alternative location’ test for urban development activities and rely of the effects management hierarchy to manage effects and apply offsetting and compensation if effects cannot be avoided, remedied or mitigated. If this recommendation is accepted, there will be no need for matter of discretion (c) identified above, as that limb of the policy will be removed.

*Operative v proposed zoning*

21. The final implementation issue NZPI has identified is the use of ‘operative’ zoning in the urban development policy. There is no consideration given to proposed zones. Given the amount of time that can lapse between a zone having legal effect and becoming operative, it is counterintuitive to only consider operative zonings when applying the policy. In effect, what this means is that urban development that is enabled by proposed zoning, which may be ‘treated as operative’ under section 86F for some years before being made operative, will require a restricted discretionary consent but will be contrary to the policy because it is not taking place on operative urban zones. While this would not be fatal to a restricted discretionary application, it still makes a mockery of the policy intent. This should be remedied by adding ‘proposed or’ into limb (ii) and of Section 3.22(1)(c) before ‘proposed’, and adding ‘proposed or operative’ to limb (iii) before ‘district plan’.

**Consent pathway for landfills and cleanfills**

22. NPZI has considered the “no practicable alternative locations, or every other practicable alternative location would have equal or greater adverse effects on a natural inland wetland” test in the context of landfills and cleanfills. Specifically, we have considered whether this helps resolve conflicts between matters of national importance when considering applications for landfills. The wording of the test means that the presence of a natural inland wetland will be determinative on the location of a landfill or cleanfill, all other things being equal. However, if other section 6 matters are in play at different landfill sites, for example an outstanding natural feature or a significant fault line, the policy direction will prioritise protection of the wetland over the protection of the outstanding natural feature or the management of significant risks from natural hazards. This is a potential unintended consequence of the inclusion of “or every other practicable alternative location would have equal or greater adverse effects on a natural inland wetland”, rather than just “no practicable alternative location”. NZPI assumes it is unintended, as a wetland that is not significant may not be more important than an outstanding natural feature, and protecting a wetland that is not significant may not be more important than managing significant risks from natural hazards.





23. On balance, NZPI considers that because the activity status assigned to landfill and cleanfill activities in the NES-F is discretionary, rather than non-complying, the unintended consequence is not as significant as it could be. As a discretionary activity, other policies that relate to section 6 matters will be considered alongside the wetland policy. However, a value judgement will still need to be made between potentially conflicting policies. It is NZPI's preference for conflicts between matters of national importance to be resolved within NPS's, rather than on a case-by-case basis. As such, NZPI recommends that "or every other practicable alternative location would have equal or greater adverse effects on a natural inland wetland" is deleted from the policy, and the test applied is just that there is "no practicable alternative location". This is considered sufficient, considering the national and regional benefit test also applied.

### **Change from 'river' to 'river bed'**

24. There has been a change to use of the word 'river' within the NPS-FM so that 'river' now reads 'river bed' in a number of locations. For example, Policy 7 now reads "the loss of river bed extent and values is avoided to the extent practicable". While 'river bed extent' provides greater clarity than 'river extent', due to the fact that 'bed' is defined in the RMA, the consequence of this wording change is that 'river values' has been narrowed to 'river bed values'. NZPI submits that this is an unintended consequence that has significant impact on the management of the values of rivers as a whole, including the water itself, and will create a significant hurdle for implementation. It creates a hole in the policy framework, as no other policy seeks to avoid the loss of the values of rivers (to the extent practicable). The addition of the word 'bed' to 'river' changes the policy intent of the NPS-FM, as there is no longer a requirement to avoid the loss of river values. This is contrary to the statement in the supporting material that "the changes do not alter the policy intent".
25. This change creates internal inconsistency in the NPS-FM, which will make applying the NPS-FM more, rather than less, challenging. For example, Clause 3.24(3) lists the values to be considered when applying the effects management hierarchy to the loss of river bed values. These include ecosystem health, indigenous biodiversity, hydrological functioning, Māori freshwater values and amenity, which all relate to the water itself as well as the river bed. Is it practical to consider these values in relation to the river bed only? In addition, this approach is inconsistent with Te Mana o Wai, which is a wholistic approach to freshwater management.
26. This change also has the effect of limiting the application of the effects management hierarchy to managing effects on the values of river beds, rather than the values of rivers as a whole. This means that under Clause 3.24, activities with a functional need to locate in a river only get the benefit of the effects management hierarchy for loss of the river bed extent or the values of the river bed, and not for loss of values associated with water in the river. Aquatic offsetting and compensation would apply to the values of river bed, but not the water itself. This is not a practical outcome and will make implementation of the NPS-FM difficult.
27. For example, an activity that results in the loss of river bed extent and values might be a reclamation for the approach to a road bridge across a river. Such an activity will have an impact on the values of the river bed that is lost, and also potentially indigenous biodiversity that lived in the location of the reclamation, amenity of the area, hydrological functions, etc. However, the policy direction would be that only the loss of values associated with the river bed extent that is





lost is avoided, and there would be no policy direction that the loss of values associated with the water in the river should be avoided. In addition, the effects management hierarchy could only be applied to the loss of river bed extent and values, and not the values associated the water itself. This will result in perverse outcomes.

28. There is no explanation for the change from 'river' to 'river bed'. NZPI submits that there are two possible drafting solutions that MfE should consider to remedy the unintended consequence:
  - a. Remove all the additional 'beds'.
  - b. Retain the additional 'beds' and add 'river' before 'values', so that, for example, Policy 7 reads "the loss of river bed extent and river values is avoided to the extent practicable".

### **Other amendments supported**

29. NZPI has reviewed the drafting of the other amendments in the exposure draft of the NPS-FM and NES-F and is generally supportive of those amendments. The remainder of the changes should improve clarity and provide solutions to practical implementation issues that have been identified by practitioners.

### **Interaction with other National Direction**

30. NZPI would like to see greater clarity on the interaction between the NPS-FM, the National Policy Statement for Indigenous Biodiversity (NPS-IB), and the National Policy Statement for Urban Development (NPS-UD).
31. The NPS-FM and NES-F prioritise urban development activities over wetland protection in certain situations by providing a specific consent pathway for urban development activities. However, there is no specific policy support for this approach in the NPS-FM, and it could be argued that such an approach (for urban development and the other consent pathways provided) is contrary to Policy 6, which is that "there is no further loss of extent of natural inland wetlands, their values are protected, and their restoration is promoted". A clear policy within the NPS-FM that explicitly provides support for the resolving of this conflict in favour of urban development, would be beneficial for implementation. Cross-reference to the outcomes sought by the NPS-UD in relation to the exceptions provided in the NPS-FM should be considered.
32. There is a potential inconsistency between the urban development consent pathway set out in the NPS-FM and the requirements of the NPS-IB. While the NPS-FM provides a specific consent pathway for urban development activities in and near wetlands, there is no equivalent consent pathway within the NPS-IB for urban development within Significant Natural Areas. Rather, the NPS-IB provides a consent pathway for specific infrastructure, but no other urban development activities. This suggests that it is appropriate for urban development outcomes to supersede wetland outcomes in some situations, but that is not the case for indigenous biodiversity. Such a distinction does not make a lot of sense when both wetlands and indigenous biodiversity are matters of national importance, and it raises the question of whether the distinction is intentional.



This is another example of why clarity is needed on how to resolve conflicts between the national policy statements.

33. NZPI understands that the National Planning Framework, to be developed under the new Natural and Built Environment Act, will address conflict within national direction. It makes sense to address this conflict now, at least within the NPS-FM and the NPS-IB as they relate to urban development. This could be achieved by including clear statements within the national policy statements themselves, or by a guidance document that provides advice on how to consider and assess applications against all the national direction. It is important that Councils, developers, infrastructure providers, environmental groups and the community can see the implementation pathways and challenges.

### **Summary of recommendations**

34. In summary, NZPI makes the following recommendations for amendments to the exposure draft of the NPS-FM and NES-F:
  - a. The word 'improved' is deleted from limb (c)(v) of the definition of 'vegetation clearance' in the NES-F, so that the reference is to 'pasture' rather than 'improved pasture'.
  - b. Exclude wetlands in the CMA from the NES-F by adding a clause to the exclusions listed in the definition of 'natural wetland' in the NPS-FM, which states that a natural wetland means a wetland that is not 'within the Coastal Marine Area'. Consequential amendments: delete the definition of 'natural inland wetland' in the NPS-FM and NES-F, and delete the word 'inland' each time the term 'natural inland wetland' is used in the NPS-FM and NES-F.
  - c. Correct the operation of the quarrying consent pathway by deleting the word 'extraction' in Section 3.22(1)(d)(iii) of the NPS-FM and replacing it with 'quarrying activities' so that the limb captures all the activities in the National Planning Standards definition and therefore applies the functional need test to all quarrying activities. Consequential amendment: change 'quarrying' in Regulation 45A to 'quarrying activity', and insert a cross-reference definition to the National Planning Standards in Regulation 3 Interpretation for 'quarrying activity' (to mirror the cross-reference definitions for other National Planning Standard terms used in the NES-F). Or apply the alternative solution in paragraph 12(b) above.
  - d. Correct the language used in the mining consent pathway by deleting the phrase "extracting any mineral in its natural state from the land" and similar phrases used in Section 3.22(1)(e) of the NPS-FM and replacing them with the word 'mining'. And, add a cross-referencing definition of 'mining' to the NES-F that refers to the RMA definition.
  - e. Add a specific list of matters of discretion for urban development activities to Regulation 45C(5) of the NES-F that mirrors the policy direction in the NPS-FM, to apply in addition to the general matter identified in Regulation 56 of the NES-F (see paragraph 16 above).
  - f. Delete limb (i) of Section 3.22(1)(c) of the NPS-FM and replace with: 'the activity contributes to a well-functioning urban environment'.



- g. Delete limb (iv) from Section 3.22(1)(c) of the NPS-FM, the ‘no practicable alternative location’ test for urban development activities.
- h. Ensure urban development in operative and proposed urban zones is considered by adding ‘proposed or’ into limb (ii) and of Section 3.22(1)(c) of the NPS-FM before ‘proposed’, and adding ‘proposed or operative’ to limb (iii) before ‘district plan’.
- i. Delete “or every other practicable alternative location would have equal or greater adverse effects on a natural inland wetland” from limb (iii) of Section 3.22(1)(f) of the NPS-FM so that the limb reads ‘there is no practicable alternative location’.
- j. Reverse the amendment the changes ‘river’ to ‘river bed’ throughout the NPS-FM and NES-F.
- k. Provide direction and/or guidance on the interaction between the NPS-FM, NPS-IB, and the NPS-UD specifically, and consider extending this to include the New Zealand Coastal Policy Statement and other national direction.

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