

New Zealand Institute of Landscape Architects  
Tuia Pito Ora Incorporated (NZILA)

**Submission on:  
Fast Track Approvals Bill**

19 April 2024

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## Introduction

1. This submission on the Fast Track Approvals Bill has been prepared by the New Zealand Institute of Landscape Architects Tuia Pito Ora (NZILA). We are an internationally recognised professional body of qualified landscape architects and represent over 1,100 members.

## Background – the Significance of Landscape

2. Landscape is the context in which we all live our everyday lives.
3. The landscape of Aotearoa New Zealand has significant and unique value to us as New Zealanders, and to the millions of people who visit our shores every year. These landscapes include not only our significant National Parks, but also our coastal, rural and urban landscapes.
4. Our landscapes play an important role in our economic wellbeing, particularly in terms of tourism and film industries. MBIE outlines that international tourism contributed \$9.9 billion to New Zealand’s economy in 2023<sup>1</sup>, our second highest export earner, and “seeing New Zealand’s landscape and scenery” is listed in the top three reasons to visit. The New Zealand screen sector earned \$3.3 billion in revenue in 2021<sup>2</sup> and employs 25,000 people. Combined, these two sectors alone contribute more to our economy than dairy exports.
5. But our landscapes also significantly contribute to our “clean and green” image that underpins many of our primary production industries. We use our landscapes to sell our products: Fonterra<sup>3</sup>, our beef and lamb industries<sup>4</sup>, and our wine industry<sup>5</sup> (amongst many others) utilise powerful imagery of our natural and rural landscapes in their online presence. Such promotion is further supported by our national carrier, Air New Zealand<sup>6</sup>.

1: <https://teic.mbie.govt.nz/teiccategories/resources/2024/03/05/international-visitor-survey-mailout/>

2: <https://www.mbie.govt.nz/business-and-employment/economic-development/screen-sector/economic-trends-in-the-screen-sector/economic-trends-in-the-new-zealand-screen-sector-february-2024/executive-summary/>

3: <https://www.fonterra.com/nz/en.html>

4: <https://beefandlambnz.com/>

5: <https://www.nzwine.com/en/>

6: <https://www.airnewzealand.co.uk/>

6. Fundamental to these concepts is that landscapes are a core part of our identity. Not only do they reflect who we are and what we want to be, they also directly contribute to our personal wellbeing. It is universally agreed worldwide that there is an unbreakable connection between landscape and community and that landscapes reflect the relationships between people and place. Worldwide definitions of landscape, and of environment, centre around the inclusion of people as a core part.
7. Such concepts underpin sustainable management and protection of natural resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural wellbeing. These include the concepts of Oranga o te Taiao, which deliver such outcomes through meaningful partnerships between Te Ao Māori and Te Ao Pākehā. All landscapes have values that are ascribed by people and embodied within landscape attributes or landscape dimensions, including physical attributes, perceptions of people, and associations of communities. Such landscape attributes are dynamic and change through time.
8. These concepts apply to all landscapes. Whilst it is easy to focus on our special natural landscapes, many of these have protections as National Parks or World Heritage Areas. However, our coastal, rural and urban landscapes are equally important to our identity and wellbeing, and for most people are more accessible. Such landscapes affect where and how we live, work and recreate.
9. We therefore consider it critically important to the future of Aotearoa New Zealand to carefully manage all of our landscapes. We must support the positive relationships that all people have with our landscapes and our environments, and understand that how landscapes are developed or changed can have significant impacts on people. Whilst we recognise and support a need to maintain efficiency when engaging with and addressing landscape values, we consider the need to acknowledge and nurture positive human relationships with place remains a necessary part of supporting human well-being.
10. We recognise that addressing such qualitative and intangible matters can generate contested planning issue, however we consider effective resource management must continue to engage with communities, and we support positive relationships with place as an integral planning outcome.

## Our Submission

11. We recognise the need for important projects that have the potential to affect the economic or social future of Aotearoa New Zealand to be given an efficient consenting pathway.
12. However, we have concerns that the Fast Track Approvals Bill significantly diminishes the ability people have to remain connected with the landscape in which they live or belong. We consider that the removal of any requirement to consult with local communities – who are embedded within the landscapes being considered for change – goes against the principles of community engagement in planning processes and sound environmental management.
13. The types of projects likely to be eligible for the fast-track process have the potential to have significant and permanent effects on our coastal, rural and urban landscapes. Residential expansion, whilst necessary to cater for our growing population, results in permanent landscape change that is difficult to alter in the future. Energy projects cater for our growing economy, but can have significant adverse effects on smaller, rural communities who often don't receive the benefits. But often, with the benefit of consultation, we have the opportunity to shape such projects to avoid or minimise effects on people and potentially create positive long-term outcomes. In addition, allowing communities to engage in decision making processes helps them better understand and connect with projects that are likely to affect them. We therefore consider that it is paramount to our way of living that decisions on significant impact projects involve the communities that are potentially affected.
14. We are also concerned about the proposal to bestow decision-making responsibility of potentially complex projects to Joint Ministers who might not have specialist resource management experience, and who are likely to be already busy with ministerial portfolios. Further, we consider that it is negligent to require such elected representatives to make decisions on projects without directly understanding the concerns of the communities they represent. The significant risk to Government and Ministers in this regard is judicial reviews, which could not only create reputational risk but also delay projects for extended periods.
15. We prefer the approach that has largely been adopted in existing fast-track legislation through the use of an expertly qualified panel to make decisions on significant projects. This panel, as is set out in the Bill, can be tailored to the specific issues of each project, supported by a process that allows engagement with potentially affected communities. In our opinion, utilising only the expert panel to make a recommendation undermines the expertise of the panel members, especially if their recommendations are overturned.
16. We also note that community engagement needs to reach further than directly adjacent landowners – for example large format wind turbines have the potential to have landscape effects that extend many kilometres beyond the site boundary. We believe the extent of engagement must be affected landowners as an absolute minimum, but with

the opportunity for it to be expanded by the expert panel based on the scale, nature and extent of potential effects.

17. Further, whilst we understand the desire to set tight timeframes around processes, we consider that there needs to be a degree of flexibility, particularly in regard to more complex proposals. Providing additional time allows for robust discussion between applicants and the panel as a way to focus on avoidance of effects in the first instance, alongside the incorporation of appropriate mitigation or remediation outcomes.
18. In this regard, we strongly question whether the Fast Track Approvals Bill:
  - a. Aligns with the fundamental concepts sustainable management, in particular the understanding that environment includes people and provides for people's wellbeing;
  - b. Aligns with long-established definitions for landscape that includes human perception and association;
  - c. Recognises the strong, unbreakable connections people have with place;
  - d. Retains New Zealand's important image and value as a tourism destination;
  - e. Promotes the opportunity for projects to deliver the best outcomes for applicants and the community together;
  - f. Protects Aotearoa New Zealand's landscape value, particularly in our coastal, rural and urban landscapes;
  - g. Retains how we use our landscapes to promote our export industries; and
  - h. Allows elected representatives to fully understand the effects of proposals on the communities they represent.

### Submission Authors

19. This submission was prepared for New Zealand Institute of Landscape Architects Tuia Pito Ora Incorporated by the NZILA RMA Reforms Working Group: Shannon Bray, Rhys Girvan, Stephen Brown, Julia Wick, Dennis Scott, Di Lucas, and others.
20. It was approved for submission by the NZILA Board, 18 April 2024.