

Tuia Pito Ora New Zealand Institute of Landscape Architects

Submission on the Illustrative National Policy Direction for New Zealand's New Planning System

16 October 2026

Submission to the Ministry for Cities, Environment, Regions and Transport (MCERT)

Executive Summary

- 1.1 Tuia Pito Ora New Zealand Institute of Landscape Architects (NZILA) appreciates the opportunity to provide feedback on the Illustrative National Policy Direction (Illustrative NPD) released by MCERT as part of the implementation pathway for Aotearoa New Zealand's new planning system. The Institute represents the professional body for landscape architects in Aotearoa New Zealand and has a longstanding interest in the identification, assessment, management and protection of landscapes, natural character and place-based values.
- 1.2 NZILA supports efforts to improve the efficiency, clarity and consistency of Aotearoa New Zealand's planning framework. However, we are concerned that aspects of the Illustrative NPD represent a substantial reduction in environmental protection, particularly regarding Outstanding Natural Landscapes (ONLs), Outstanding Natural Features (ONFs), and areas of High Natural Character (HNC).
- 1.3 While the Illustrative NPD states that these areas should be protected from inappropriate development, the practical effect of the proposed directives appears to be a recalibration of protection away from avoiding adverse effects and towards managing only "significant adverse effects". This is not a minor drafting refinement. It represents a fundamental shift in policy intent and outcome. The change risks normalising incremental degradation of natural and landscape values within areas that have traditionally been recognised as possessing the highest levels of natural and landscape value.
- 1.4 NZILA is also concerned by:
 - The increasing emphasis on national consistency at the expense of local context and landscape specificity.
 - The proposal to establish nationally standardised methodologies for identifying HNC, ONFs and ONLs.
 - The explicit contemplation of urban development within ONLs and HNC areas.
 - The apparent weakening of precautionary approaches within highly valued landscapes and the coastal environment.

- Potential conflicts between property-rights-based planning objectives and the long-established public interest in protecting nationally important landscapes.
 - Limited recognition of tangata whenua landscape values and mātauranga Māori-led approaches to landscape assessment.
- 1.5 NZILA recommends revision of Sub-theme 4 and offers assistance in developing national landscape guidance and methodologies based on *Te Tangi a te Manu: Aotearoa New Zealand Landscape Assessment Guidelines*¹, which includes an established methodology for the identification of ONL, which is recognised by the Environment Court.

Introduction

- 2.1 NZILA supports a planning system that is efficient, proportionate and capable of delivering housing, infrastructure and economic development while maintaining the characteristics and values that define New Zealand's natural environments and landscapes.
- 2.2 Landscape is not simply a constraint on development. Landscape attributes and values underpin national identity, economic productivity, tourism, recreation, biodiversity outcomes, cultural connections and community wellbeing. Once degraded, many landscape attributes and values cannot be recreated.
- 2.3 The Planning Act and Natural Environment Act include goals to protect areas of high natural character and outstanding natural features and landscapes. The Illustrative NPD must therefore provide direction capable of giving practical effect to these goals. The current drafting does not consistently achieve this due to the omission of goals from some themes and the prioritisation of some goals over others, placing disproportionate emphasis on enabling housing and development, primary production and infrastructure at the expense of environmental and cultural landscape values.

General Comments on the Illustrative NPD

3.0 CONFLICT RESOLUTION

- 3.1 The illustrative NPD does not adequately identify how conflicts between the goals are to be addressed. For example, there is no direction on how to reconcile the Planning Act goal to enable competitive land markets while protecting public values from inappropriate development. HD-Directive 1.6 refers to criteria in national standards to determine when urban development is allowed to be located in areas of high natural character and outstanding natural features and landscapes, where the development meets capacity or intensification requirements. This signals that trade-offs will be made in national standards, rather than in the National Policy Direction, which is inconsistent with section 54 of the Planning Act and section 79 of the Natural Environment Act.

¹ [Te_Tangi_a_te_Manu_Version_01_2022_.pdf](#)

- 3.2 National Policy Direction should provide direction on how conflicts within and between the goals of both Acts should be resolved. Not providing this direction creates uncertainty that the goals, including the protection of areas of high natural character and outstanding natural landscapes and features, can be achieved.

4.0 GAPS

- 4.1 The illustrative NPD excludes important policy direction from key national policy, including the New Zealand Coastal Policy Statement, the National Policy Statement for Freshwater Management and the National Policy Statement for Indigenous Biodiversity, creating significant gaps in the new planning system and further uncertainty in its implementation.

5.0 RECOGNITION OF THEMES AS BEING ‘CROSS-CUTTING’

- 5.1 Climate change is not sufficiently reflected as a cross-cutting issue despite its relevance to all of the illustrative NPD themes and many of the goals in the Acts.
- 5.2 Māori interests would also be more appropriately positioned as having relevance to all aspects of the planning framework, rather than as separate policy directives.
- 5.3 The separate Public Values theme understates the significance of environmental and cultural landscape values. These values, which include other intrinsic values not held by the “public”, underpin environmental, social, cultural and economic wellbeing. Their inclusion in a singular theme fails to recognise that these values are inherent across all themes, including those related to housing and development, and infrastructure. Public values (which should be renamed to reflect intrinsic environmental and cultural values), should be integrated as a cross-cutting directive rather than as a standalone theme.

6.0 RELIANCE ON FUTURE NATIONAL STANDARDS AND LACK OF POLICY DIRECTION

- 6.1 Many policy directives, such as those relating to areas of high natural character and outstanding natural features and landscapes, have been deferred to future national standards. This creates uncertainty regarding the implementation of the planning system.
- 6.2 Many of the policy directives remain undefined. Terms such as “reasonable use”, “unreasonable effects”, “proportionate protection” and “regulatory relief” lack sufficient explanation and may give rise to different interpretations and ongoing future litigation.

7.0 OVER-RELIANCE ON NATIONAL CONSISTENCY

- 7.1 NZILA acknowledges the desire for greater consistency across councils and regions; however, landscape attributes and values are inherently contextual.
- 7.2 Landscape assessment involves understanding the relationship between biophysical attributes, cultural values, perceptual qualities, existing modification, tangata whenua associations, and the way landscapes are experienced by people. These matters vary considerably across regions.

- 7.3 A singular focus on consistency risks producing outcomes that are technically uniform but environmentally inappropriate.
- 7.4 National consistency should not become synonymous with national standardisation.
- 7.5 The most successful planning frameworks establish consistency of process while retaining flexibility of judgement. The Illustrative NPD should therefore distinguish between:
- Consistent assessment principles; and
 - Site/place/culturally-specific evaluative judgement.
- 7.6 The latter remains essential to sound landscape planning.

8.0 FALSE EQUIVALENCE BETWEEN GROWTH AND LANDSCAPE PROTECTION

- 8.1 Throughout the Illustrative NPD there is a recurring theme that environmental values sit alongside development aspirations without hierarchy. While NZILA accepts the legislative framework underpinning this approach, there are certain environmental attributes that Parliament has historically recognised as nationally important.
- 8.2 Outstanding Natural Landscapes and Outstanding Natural Features occupy a special position because they represent the most exceptional landscapes in New Zealand. The Illustrative NPD should recognise that regionally and nationally significant landscapes require a different management response than ordinary environments.
- 8.3 Failure to do so risks eroding the very values that justify their identification.

Theme 5, Sub-Theme 4: High Natural Character and Outstanding Natural Features and Landscapes

9.0 OVERALL POSITION

- 9.1 NZILA supports the policy intent that these areas should be protected from inappropriate development. However, we are concerned that many of the operative directives weaken that intent through the way conflicts are proposed to be resolved. The drafting increasingly frames landscape protection as one consideration among many rather than as a strong environmental bottom line.

10.0 ISSUE 1: SHIFT FROM AVOIDING ADVERSE EFFECTS TO AVOIDING SIGNIFICANT ADVERSE EFFECTS

- 10.1 This is NZILA's primary concern.
- 10.2 Historically, natural character and outstanding landscapes have been afforded a very high level of protection through planning instruments derived from section

6(a) and 6(b) of the RMA and the New Zealand Coastal Policy Statement (NZCPS). The proposed policy framework increasingly introduces language focused on "significant adverse effects" and protection against irreversible loss rather than broader adverse effects.

- 10.3 The implications are profound.
- 10.4 The distinction between avoiding adverse effects; and avoiding significant adverse effects is not semantic. It creates a substantially different threshold for development. Under the former approach, developments must generally maintain and/or enhance landscape values and integrity. Under the latter approach, developments may proceed provided effects are characterised as less than significant.
- 10.5 This creates substantial risk of:
- incremental degradation;
 - cumulative landscape change;
 - erosion of wilderness and naturalness;
 - weakening of landscape coherence;
 - adverse precedent effects; and
 - progressive urbanisation of protected landscapes.
- 10.6 The greatest threat to regionally and nationally significant landscapes is seldom a single transformative development. More commonly it is the accumulation of individually moderate effects over time (i.e. death by a thousand cuts).
- 10.7 NZILA strongly recommends reinstating a policy framework that requires avoidance of adverse effects that compromise the identified values and attributes of ONLs and ONFs and identified areas of outstanding and high natural character.

11.0 ISSUE 2: NATIONAL LANDSCAPE METHODOLOGIES

- 11.1 PV-Directive 4.1 proposes nationally prescribed criteria and methods for identifying High Natural Character areas, Outstanding Natural Features and Outstanding Natural Landscapes.
- 11.2 NZILA accepts that nationally consistent guidance may improve certainty and reduce unnecessary disputes. However, a nationally mandated methodology presents significant risks if not carefully developed. Landscape assessment necessarily involves expert evaluation and professional judgement. Landscape values cannot be reduced to a purely formulaic or checklist-based exercise.
- 11.3 NZILA strongly recommends that any nationally prescribed methodology is **founded upon *Te Tangi a te Manu* – and we welcome the opportunity to explore this further with you.**
- 11.4 The concept of nationally consistent methodologies should not be interpreted as requiring nationally uniform outcomes or nationally uniform expressions of mātauranga Māori. Consistent with the approach reflected in *Te Tangi a te*

Manu, mātauranga Māori is place-based and derived from the particular relationships that tangata whenua have with their ancestral landscapes. National standards should therefore provide a consistent framework while retaining sufficient flexibility for iwi and hapū-specific knowledge, values and perspectives to influence the assessment and identification of areas, features and landscapes.

- 11.5 *Te Tangi a te Manu* provides the most robust and widely accepted landscape assessment framework currently available in Aotearoa New Zealand.
- 11.6 It reflects:
- landscape science;
 - professional practice;
 - tangata whenua perspectives;
 - experiential values;
 - evaluation of significance; and
 - effects assessment methodologies.
- 11.7 Assessment methodologies should incorporate:
- mātauranga Māori;
 - tangata whenua values;
 - experiential and perceptual values;
 - landscape character;
 - natural character;
 - aesthetic values;
 - associative values;
 - ecological values; and
 - Professional judgement.
- 11.8 National methods should guide assessment rather than prescribe predetermined outcomes. Landscape assessment remains an evaluative discipline requiring expert judgement.
- 11.9 Landscape capacity – National direction should distinguish between landscape value, landscape sensitivity and landscape capacity. Identification of an outstanding or highly valued landscape does not, in itself, determine the effects of every form of change. Conversely, an absence of significant effects from an individual proposal does not necessarily demonstrate that further change can be accommodated without cumulative degradation.
- 11.10 National guidance should support assessment of the nature and degree of change that a landscape can accommodate while retaining the attributes and values for which it is recognised.

12.0 ISSUE 3: EXPLICIT CONTEMPLATION OF URBAN DEVELOPMENT WITHIN ONLS AND HNC AREAS

- 12.1 One of the most notable policy shifts is the explicit inclusion of conflict-resolution provisions relating to housing, urban development and infrastructure within areas protected under Sub-theme 4.
- 12.2 Only a few years ago, the proposition that urban development would routinely be contemplated within ONLs would have been considered extraordinary in many regions.
- 12.3 The Illustrative NPD appears to assume that urban development may be compatible with ONLs provided certain thresholds are met.
- 12.4 NZILA considers this approach problematic.
- 12.5 The key question should not be whether urban development can occur in an ONL; it should be whether urban development is appropriate within the identified landscape.
- 12.6 In many cases the answer will appropriately be no.
- 12.7 Urbanisation typically introduces:
- built form;
 - domestication;
 - transport infrastructure;
 - earthworks;
 - visual change;
 - fragmentation; and
 - cumulative landscape effects.
- 12.8 These effects frequently erode the qualities that justify ONL identification.
- 12.9 NZILA recommends a clear directive that urban expansion should preferentially avoid ONLs, ONFs and HNC areas except where no reasonably practicable alternatives exist, or where the values of these identified areas will be enhanced.

13.0 TANGATA WHENUA AND CULTURAL LANDSCAPES

- 13.1 NZILA supports ongoing engagement regarding Treaty settlement obligations and Māori interests.
- 13.2 However, the current drafting does not adequately recognise:
- cultural landscapes;
 - ancestral landscapes;
 - whakapapa relationships; and
 - cultural associations that extend beyond mapped sites.

- 13.3 The Illustrative NPD should provide clearer direction regarding incorporation of mātauranga Māori and iwi-led landscape assessment approaches.
- 13.4 Landscape values cannot be separated from people and place. Consistent with the bicultural landscape framework reflected in *Te Tangi a te Manu*, landscapes are understood not solely through their physical attributes, but through the relationships, histories, identities and meanings associated with them. This includes the interconnected relationships between tangata whenua and whenua that arise through whakapapa and mātauranga Māori, as well as broader cultural and community associations
- 13.5 The Illustrative NPD should more explicitly recognise cultural and ancestral connection to place and acknowledge that tangata whenua relationships with landscape often extend across wider areas and networks of places that cannot be fully understood through site-based identification alone. Greater direction is needed regarding the consideration of mātauranga Māori, cultural associations and place-based values as integral components of landscape understanding, rather than matters confined to identified cultural sites or statutory acknowledgements.

Additional Issues Beyond Sub-theme 4

14.0 REVERSE SENSITIVITY

- 14.1 Numerous themes include strong provisions addressing reverse sensitivity.
- 14.2 While these provisions may provide certainty for infrastructure and production activities, there is a risk they become a mechanism for reducing scrutiny of landscape effects.
- 14.3 NZILA recommends clearer safeguards where nationally important landscape values may be affected.

15.0 INFRASTRUCTURE PRIORITY

- 15.1 The Illustrative NPD places considerable emphasis on enabling infrastructure and reducing barriers to development.
- 15.2 NZILA supports strategic infrastructure; however, regionally and nationally significant infrastructure should not automatically override regionally nationally significant landscape values.
- 15.3 Infrastructure policy should require early consideration of:
- avoidance;
 - route selection;
 - landscape integration;
 - design quality; and
 - mitigation hierarchy principles.
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16.0 ENVIRONMENTAL LIMITS FRAMEWORK

- 16.1 The Illustrative NPD appears to rely increasingly on environmental limits as a primary mechanism for environmental management.
- 16.2 Landscape values differ fundamentally from biophysical attributes such as water quality as landscape values cannot be meaningfully expressed through numerical limits.
- 16.3 The Illustrative NPD should acknowledge that landscape management requires qualitative and values-based assessment approaches.

17.0 RECOMMENDATIONS

- 17.1 NZILA recommends that MCERT:
 - i. Reinstate stronger protection for ONLs and ONFs through avoidance-based policy language.
 - ii. Explicitly recognise cumulative landscape effects.
 - iii. Amend Sub-theme 4 to clarify that urban development within ONLs and HNC areas should generally be avoided.
 - iv. Develop national landscape methodologies in partnership with NZILA and iwi.
 - v. Base any national methodologies on Te Tangi a te Manu.
 - vi. Retain flexibility for regional and site-specific assessment.
 - vii. Strengthen recognition of cultural landscapes and mātauranga Māori.
 - viii. Ensure infrastructure and development directives do not inadvertently undermine nationally important landscapes.
 - ix. Provide explicit guidance on assessing landscape capacity and landscape sensitivity.

Conclusion

- 18.1 NZILA supports the objective of creating a more efficient and nationally coherent planning system. However, efficiency and consistency should not be achieved through reducing the protection of New Zealand's most valued landscapes.
- 18.2 The proposed direction for High Natural Character areas, Outstanding Natural Features and Outstanding Natural Landscapes signals a significant departure from the longstanding statutory and policy approach that these environments warrant an elevated level of protection.
- 18.3 The shift from avoiding adverse effects to avoiding significant adverse effects, coupled with increased standardisation and the explicit contemplation of urban development within protected landscapes, creates substantial risk of long-term degradation of regionally and nationally important landscape values.

- 18.4 NZILA encourages MCERT to refine the proposed Illustrative NPD so that it provides a framework that is nationally consistent while remaining responsive to landscape context, professional judgement, tangata whenua values, and the enduring public interest in protecting Aotearoa New Zealand's most outstanding landscapes.
- 18.5 NZILA would welcome ongoing engagement with MCERT regarding the development of national landscape standards, methodologies and implementation guidance.

AUTHORS AND APPROVALS

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

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