

Proposed Natural Resources Plan for the Wellington Region

Review of the PNRP Objectives Framework: Response from s42A authors

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Terms of Reference

The ToR asked the Objectives Review to consider:

- a) the explicit and implicit linkages between objectives, including between any ‘over-arching’ and ‘activity’ or ‘topic specific’ objectives;
- b) any ‘mixed messages’, duplication or conflict in terms of the collective outcomes expressed for matters common to more than one objective;
- c) whether any duplication could be removed without changing the collective outcomes sought in the objectives; and
- d) whether, if any objectives might be more appropriately recast as policies if they are deemed to be ‘implementing’ other objectives.

More specifically, the ToR further asks that, having considered the related policies, whether:

- a hierarchy of overarching objectives need to be explicitly identified;
- any topic-specific objectives need to be deleted;
- any, or all, overarching objectives may be considered redundant or edited to avoid confusion with topic specific objectives; and
- the suite of objectives can remain unchanged.

Key Findings of the Objectives Review

Our summary of Mr Willis’s conclusions is that:

- By and large, there is nothing inherently problematic with the suite of objectives proposed.
- However, the framework used to organise the objectives is not obvious and some issues appear fragmented in how they are addressed.
- The relationship between individual objectives is complex. This complexity would not be accurately reflected by having two-tier structure of “over-arching” and “contributing” objectives. Certainly the first five objectives do not provide that strategic framework. Such an approach is not recommended.

- Two options are suggested for regrouping the objectives to provide greater clarity, however the report stops short of recommending either approach.

Option 1: (The simplest approach set out in Table 1 of the Review Report), suggests a way to *explain* the objectives framework without requiring a widespread reworking of the objectives themselves. It does this by splitting the objectives into those that set out:

- (a) How resources will be managed; and
- (b) Environmental outcomes.

Sub-headings are inserted within this structure to cluster the objectives around sub-themes.

The author concludes “However the framework admittedly remains complex and arguably not easily navigable by the layperson. It also contains objectives of a type and nature that may not be strictly necessary if there is an underlying desire to streamline the framework.”

Option 2: Suggests a more radical change (summarised in Appendix 2 of the Review Report) to produce a simpler, more streamlined framework by grouping objectives by resource and by value, and combining and deleting objectives to remove duplication and clarify linkages with a clear flow of logic from problem/pressure to solution/response.

Response from Submitters

There is general agreement from those submitters who responded to Mr Willis’s report that there are opportunities to improve the structure and drafting of the objectives, including regrouping and streamlining to make the plan simpler, clearer and more useable.

Submitters are concerned about the detail of the revised objectives and ensuring that these address the issues raised by them in their submissions and expert evidence. A summary of submitters’ comments is set out below.

Federated Farmers	Agrees there is scope for re-ordering and streamlining pNRP objectives but does not agree with the simplified alternative framework, in part because this structure obscures the values that are being supported by those objectives characterised as “resource-focussed”. Instead would like the plan structure be amended to present objectives and policies together, grouped by values, to improve functionality and readability, and to assist in highlighting duplications and gaps.
MDC, SWDC	Supports the findings of the integration review report in principle, but stand by the detailed relief sought in their submissions
NZTA	Considers that the suggested amendments improve the workability of the objectives, but fall short of addressing NZTA’s concerns outlined in their submission and evidence, relating predominantly to making provision for RSI.
Minister of Conservation	Makes a number of detailed responses to the specific changes suggested as part of option 2.
Wellington Water	Concerned more with the issues raised in their submission than the

	framework per se.
Rangitāne o Wairarapa	Supports a radical rationalisation of the objectives framework and would appreciate development of an interim set of objectives that resolve the issues raised by Mr Willis and submitter witnesses that submitters can respond to.
CentrePort Ltd and CentrePort Properties	Consider the current framework to be generally acceptable, subject to amendments sought by submissions and more detailed planning evidence.
Wellington International Airport	Agrees with the structural difficulties identified. Requests a more detailed review of both the objectives and policies, as per their submission, to ensure an integrated approach is taken. Request an analysis as to whether there is scope for significant changes, as suggested by Appendix B of the Review.
Fish and Game	Welcomes the suggestion to rationalise objectives and delete a number of activity specific objectives. Support on the basis that the remaining objectives that manage for environmental values, such as freshwater quality, are sufficiently robust, comprehensive and transparent to ensure that activities can be managed to secure the outcomes sought by the RMA, the NPSFM and the RPS.

Response of section 42A Authors

As section 42A report authors we have read and considered the conclusions and options presented in the objectives review report. Moreover, we have considered these within the context of our understanding of how the entire plan framework works with respect to our Topic Reports and our evaluation of submissions received on all the relevant Topic provisions (objectives, policies, rules and other methods, definitions, schedules and maps).

We offer the following comments:

- In summary, we consider that the Objectives Review offers a useful summary of the nature of the package of objectives in the proposed Plan assessed against the tests of an ideal objectives package. We do not disagree with the issues identified; being complexity, some duplication, some clauses that fulfil the role of a policy, and a lack of coherence between some objectives that address the same resource.
- We would like to highlight that the objectives framework is necessarily complex in scope, combining five regional plans that address the management of land, water, air, and coast, meeting Council's obligations under the RMA and a number of national policy instruments, and working to manage these resources and functions in an integrated way.
- We also note that, while the linkages between natural resources are inherently complex, there is an administrative need to split the s42A reports into manageable, albeit somewhat artificial, topic groupings. We acknowledge that this can present challenges in terms of responding to issues in an integrated manner, but can see no practical alternative.

- We agree with the observation that some objectives set out how resources are to be managed (process objectives), while others are focused on the outcomes to be achieved by management. As concluded by the Objectives Review, we also consider that these are legitimate roles of resource management objectives and also note that this a common approach used in other regional plans.
- We agree that the framework of objectives could be improved: there are a number of objectives that could be rationalised, combined and redrafted to more effectively and efficiently express the desired outcomes and to simplify the framework of objectives. We also note that there are several objectives that were included in the proposed Plan in response to community consultation. While we agree that these objectives need to meet the tests of a good objective, one of the principles of the RMA is to provide for community involvement in the plan making process; the decision to retain some objectives may therefore be based on a legitimate desire to honour the input from the regional community.
- We consider that it is very early in the Hearings Process to recommend changes to the overall framework of the proposed Plan but, in response to the desire of the Hearing Panel to traverse the objectives framework now, we indicate the following broad areas of amendment that the team of s42A writers are considering:
 - combining objectives that focus on the same resource-based outcome, but which address different attributes, so that they more coherently sit within one objective as specific clauses, rather than being spread across several objectives;
 - removing clauses that meet the purpose of a policy rather than that of an objective; as well as
 - redrafting details of objectives in response to concerns raised by submitters.
- We do not consider that, in general, the existing ‘framework of *headings*’ is unhelpful but consider that reworking the objectives as set out above will provide a simplified and more coherent package that will improve the overall usability and clarity of the Plan and make it more efficient and effective for plan users.
- That said, as the groupings of objectives are evaluated within the section 42A Topic Reports, taking into account the concerns raised by submitters as well as the concerns raised by the Hearings Panel, recommendations for heading changes may ensue. We consider that this is more in the nature of a ‘final tidy-up’ which can easily be accommodated as part of a final review of the whole plan following the completion of hearings.
- The s42A authors will provide more detailed responses to their individual “package” of objectives within their s42A reports or Officer’s Replies, considering both the suggestions made in the Objectives Review and the detailed comments made in submissions. However, we consider that it would be helpful (if somewhat premature) for us to provide some early thoughts as to a possible simplified framework, in a similar format as offered by Appendix B of the Objectives Review.

**‘Strawman’ simplified alternative framework
(interim thoughts of s42 authors as of 11 August 2017)**

Resource-focused objectives
<p>Ki uta ki tai: Mountains to the sea (or Integration?) O1, O2, O3, O4</p>
<p>Aquatic ecosystems O5 O25 (consider reworking as below) O18, O27, O28, O29, O30, O31, O35 (Combined biodiversity objectives. Consider whether these can be worked into O25 as Tables 3.4-3.8 essentially provide a definition for healthy functioning ecosystems) O44 (part - see below in Soil), O45, O46, O49, O51 <i>The interactions between objectives grouped here under aquatic ecosystems and below in Water (fresh and coastal) are complex and will be further considered in Hearing Stream 4.</i></p>
<p>Water (fresh and coastal) O6, O7, O8, O23, O24, O48, O50, O52 <i>The interactions between objectives grouped here under Water (fresh and coastal) and aquatic ecosystems above are complex and will be further considered in Hearing Stream 4.</i></p>
<p>Soil O42 (combined with O44), O43, O47</p>
<p>Air O39, O40, O41</p>
<p>The coast O53-59</p>
Values-focused objectives
<p>Maori values and relationships O11, O14, O15, O16, O26, O33 (combined) <i>Note that O26 is also provided for in Tables 3.4, 3.5, 3.7 and 3.8.</i></p>
<p>Natural character, form and function, natural processes, hazards O17, O19, O20, O21 and O22</p>
<p>Outstanding Natural features and Landscapes O32, O36, O37</p>
<p>Historic heritage O34</p>
<p>Resource use, infrastructure and renewable energy O12, O13</p>
<p>Recreation and public access O9, O10, O38</p>

**APPENDIX B – Simplified alternative framework
From the Objectives Review report**

Resource-focused objectives
Integration O1
Water [O5, O23, O24, 25(part) – combined into new O5 as per page 14] O46, O47, O48, O49, O50, O51 (discharges), O6, O7, O52
Aquatic ecosystems O4 [25 – as revised as per page 14 combined with O26, O27, O28, O29, O30 & O45] O35
Soil O42, O43 (revised as per page 16)
Air O39, O40, O41
The coast O54, O55, O56, O57 (revised as per page 17), O58, O59
Values-focused objectives
Natural character and natural processes O17, O18, O19, O20, O21, O32, O33, O36, O37, O38
Maori values and relationships O3, O11, O14, O15, O16, O33
Resource use, infrastructure and renewable energy [O2 & O8 combined], [O12 & O13 combined]
Recreation and public access O9, O10

Notes:

- Objectives O22, O44 and O53 are deleted entirely.
- Objectives shown in grey font are considered non-essential