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For Environment Select Committee

Submission on Planning Bill and Natural Environment Bill

- 1 Boffa Miskell Limited (*Boffa Miskell*) welcomes the opportunity to submit on the Planning Bill and Natural Environment Bill (referred to collectively as the *Bills*).
- 2 Boffa Miskell supports the overall intent and structure of the Bills, including:
 - (a) the transition to a more strategic and outcomes-led planning system;
 - (b) provision for greater reliance on spatial planning to guide growth and infrastructure; and
 - (c) clearer national direction to improve efficiency and certainty for all participants in the planning process.
- 3 While Boffa Miskell agrees with the overall intent and structure of the Bills, there are several aspects of the Bills that Boffa Miskell considers could be improved to better give effect to the reform objectives¹ while ensuring that the Bills provide a continued ability to manage and enhance Aotearoa's environments and deliver quality land-mark projects.
- 4 Boffa Miskell's detailed submission in respect of these matters, and our proposal for how they might best be addressed through the Bills, is included in **Appendix A**.
- 5 Boffa Miskell would be grateful for the opportunity to appear before the Environment Select Committee to speak to its submission, and we are happy to answer any questions in advance of that.

Kerry Gupwell
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¹ As articulated in the Explanatory notes to the Bills, being: to make it easier to get things done by unlocking development capacity for housing and business growth, enabling delivery of high-quality infrastructure for the future and enabling primary sector growth and development.

APPENDIX A – SUBMISSION

1 Introduction

- 1.1 Boffa Miskell is a leading environmental planning and design consultancy firm with offices across Aotearoa. We work with a wide range of local and international, private and public sector clients in the areas of planning, urban design, landscape architecture, landscape planning, ecology, biosecurity, cultural heritage, graphics and mapping.
- 1.2 Boffa Miskell has been involved in the design and development of many of Aotearoa's largest projects in recent years, including, most notably:
- (a) New Zealand International Convention Centre (NZICC) – located in the heart of Auckland's CBD and opening in February 2026, the new NZICC will be the largest and most versatile conference, exhibition and entertainment space in New Zealand. We were the lead landscape architects for the NZICC site and surrounding streetscape.
 - (b) Metropolitan Centre – located within the emerging Drury growth area in south Auckland, Drury Metropolitan Centre is a major new urban centre designed to support future growth. Boffa Miskell has been involved from the original masterplan and the recent Stage 2 fast-track consenting process, providing landscape architecture and urban design leadership. Our work includes strategic public realm planning, streetscape and open space design, and the integration of green infrastructure and cultural narratives to establish a strong sense of place. We continue to support the project through detailed design and delivery, working collaboratively to realise a cohesive and enduring urban environment.
 - (c) Parliament's new Western Precinct – a proposal to expand and future-proof the Parliamentary Precinct, including the construction of new buildings to house MPs and staff. Boffa Miskell's role has required it to navigate the unique security requirements of the Parliamentary Precinct, in addition to needing to manage the tension between security and accessibility.
 - (d) Punangairi Visitor Centre – the redeveloped Punangairi Visitor Experience Centre in Punakaiki – Dolomite Point, which opened in 2024. The redeveloped visitor centre also includes outdoor public areas, a connected exhibition building and infrastructure improvements, including a pedestrian/cycle way and upgraded parking facilities. Boffa Miskell was involved throughout the life of the project, including at the commencement of the Dolomite Point Redevelopment Opportunity Study undertaken in 2016 to 2019.
 - (e) Dunedin Hospital – the new modern hospital situated across two blocks in central Dunedin. Boffa Miskell was engaged to provide planning services (including resolution of District Plan appeals, identification of consents, input into concept design, preparing and obtaining consent) and to provide visual assessments and Crime Prevention through Environmental Design assessments.
 - (f) Waterview Connection – the final motorway connection required to complete Auckland's Western Ring Route. It comprises twin 2.5km motorway tunnels plus associated connecting roading infrastructure and, at Great North Road in Waterview, a large interchange of ramps. The project involved wide community

engagement and works within the affected communities, including open space / parks delivery and other infrastructure to offset the disruption and wider related adverse effects. Boffa Miskell was responsible for leading the delivery of landscape architecture and urban design outcomes.

- (g) Project Onslow – a proposal for a pumped hydro scheme capable of providing at least 5 TWh of annual generation / storage, located north-east of the Mata-Au / Clutha River in Central Otago. We were part of a consortium (Te Rōpū Matatau) to prepare a feasibility study into the technical, environmental, social, cultural and commercial considerations of a pumped hydro scheme for the Ministry of Business Innovation and Employment.
- (h) Waihi North – a mining project recently consented under the Fast-track Approvals Act 2024, enabling an underground gold mine beneath Coromandel Forest Park, alongside upgrades to the existing process plant and associated tailings storage facilities adjoining Waihi. Boffa Miskell played a key role in identifying landscape and ecological effects and shaping management measures through the consent process.

1.3 Additionally, Boffa Miskell has been a key contributor to several recent publications on relevant guidance in the landscape and urban design space, including:

- (a) Preparation of the “Roadmap for Scaling Nature-based Solutions for Climate Adaptation in Aotearoa New Zealand” for the Ministry of the Environment (2024).
- (b) Preparation of the “Aotearoa urban street planning and design guide” for Waka Kotahi (2022).
- (c) Contributing authors to Te Tangi a te Manu, Aotearoa New Zealand Landscape Assessment Guidelines (2022).
- (d) Preparation of the National medium density design guidelines for the Ministry for the Environment (May 2022).

1.4 Boffa Miskell has also regularly worked with councils across the country on the assessment of their areas of landscape and natural character, including studies for Banks Peninsula, Canterbury, Nelson, Marlborough, Greater Wellington, and Waikato.

1.5 Accordingly, Boffa Miskell has a keen interest in resource management reform; particularly as it affects the way in which high-quality built environments and key infrastructure projects can be provided in Aotearoa. Boffa Miskell is committed to ensuring that legacy projects that contribute significantly to Aotearoa are delivered well. When thoughtfully planned and integrated with their surroundings, such projects can deliver enduring value beyond economic gain alone, including social, environmental, and cultural benefits that support resilient communities and places over time. Realising these broader benefits will depend on a regulatory framework that enables high-quality outcomes to be properly considered and given effect to in decision-making.

1.6 We are aware that a number of other professional organisations, including those that our staff are members of, have prepared detailed submissions on the Bills. This submission does not repeat the content of those submissions, but rather focuses on the key changes to the provisions that Boffa Miskell considers are required to ensure the

Bills provide a continued ability to manage and improve the quality of Aotearoa's environments.

2 Background

- 2.1 Planning practice in Aotearoa has developed over many decades through a wide range of approaches designed to manage how people and communities use, develop, and protect land and natural resources across urban, rural, and natural environments. This includes various methods for shaping urban form and accommodating growth, but equally incorporates the planning, delivery and integration of infrastructure, the management of rural and productive land uses, and the stewardship of natural systems such as freshwater, biodiversity, landscapes, and coastal environments.
- 2.2 Tools such as growth management strategies, hazard management frameworks, regional and district plans, landscape and natural character assessments, network utility planning, and infrastructure corridors all play vital roles in ensuring places function well and remain resilient. By coordinating land use, environmental management, and infrastructure provision, these planning methods support the wellbeing of communities, enable economic activity, sustain productive rural landscapes, and maintain and enhance the natural environments that underpin Aotearoa's identity and long-term resilience.
- 2.3 Boffa Miskell is a practice-based, implementation-focused consultancy. Our work involves projects in a variety of landscapes and a range of forms across the country, recognising that every environment includes natural processes and a distinctive character within which people live and work (for example an intensifying metropolitan centre, a working rural valley, or a coastal settlement) and that each function differently and require diverse, context-responsive outcomes to maintain and enhance their quality.
- 2.4 The focus of Boffa Miskell's multi-disciplinary team is large scale complex projects delivering quality development that respects the environment. We regularly undertake landscape and urban design assessments of large-scale projects such as those identified in section 1 of this submission, informed by Part 2 of the Resource Management Act 1991 (*RMA*) and specifically sections:
- (a) 6(a): the preservation of the natural character of the coastal environment, wetlands, lakes and rivers;
 - (b) 6(b): the protection of outstanding natural features and landscapes;
 - (c) 7(c): the maintenance and enhancement of amenity values; and
 - (d) 7(f): the maintenance and enhancement of the quality of the environment.
- 2.5 Recognising the change in direction signalled by the reform programme, Boffa Miskell considers it essential that the new system continues to enable consideration of the key elements of a well-functioning environment that were protected under the RMA, particularly in the context of plan-making and decision-making for development and infrastructure. A coherent, integrated planning system is critical to enabling the delivery of complex projects ensuring high-quality environments which are valued across Aotearoa.

- 2.6 To that end, Boffa Miskell’s submission relates to the following specific provisions of the Bills:
- (a) The core provisions for decision making articulated as “Goals” in each of the Bills.
 - (b) The specifically listed categories of effect that are to sit outside the scope of the Planning Bill.
 - (c) The provisions that set the required content of regional spatial plans to be prepared under the Planning Bill.

3 **Part 2: Foundations – Goals**

Provisions

- 3.1 The purpose statements of the respect Bills are:
- (a) “to establish a framework for planning and regulating the use, development, and enjoyment of land”.²
 - (b) “to establish a framework for the use, protection and enhancement of the natural environment”.³
- 3.2 These purposes are given effect to through the Bills’ operative provisions, including the establishment of national direction, spatial planning and land-use planning instruments, and decision-making frameworks that guide how land use and development are managed within environmental limits over time.
- 3.3 Within that framework, the goals of each Bill articulate the specific outcomes sought to be achieved. The goals are intended to inform the content of planning instruments and the exercise of decision-making functions, ensuring that the high-level purposes are translated into practical, outcome-focused directions in the operation of the respective regimes.
- 3.4 Clause 11 of the Planning Bill sets out the goals for persons exercising or performing functions, duties or powers under the Planning Bill, and includes goals:⁴
- (a) to create well-functioning urban and rural areas; and
 - (b) to protect from inappropriate development the identified values and characteristics of:
 - (i) Areas of high natural character within the coastal environment, wetlands, and lakes and rivers and their margins:
 - (ii) Outstanding natural features and landscapes.

² Planning Bill, clause 4.

³ Natural Environment Bill, clause 4.

⁴ Planning Bill, clause 11(1)(c) and (g)(i),(ii).

3.5 Clause 11 of the Natural Environment Bill sets out the goals for all persons exercising or performing functions, duties or powers under that Bill, and includes goals:⁵

- (a) to enable the use and development of natural resources within environmental limits;
- (b) to safeguard the life-supporting capacity of air, water, soil, and ecosystems; and
- (c) to achieve no net loss in indigenous biodiversity.

Operation of the proposed provisions

3.6 Boffa Miskell considers that there are several issues with the goals as drafted that may give rise to unintended consequences and/or result in sub-optimal outcomes:

- (a) Boffa Miskell considers that the goals should recognise the value of protecting and enhancing everyday landscapes, as well as the identified significant landscapes that are specifically provided for in the Bills as currently drafted. Boffa Miskell strongly supports the ongoing protection of areas of high natural character within the coastal environment, wetlands, lakes, rivers, and their margins, and outstanding natural landscapes and features, but consider that quality environmental outcomes across the system will only be achieved if Aotearoa’s planning framework also recognises the role of everyday landscapes in shaping people’s lives. These more common landscapes collectively contribute to environmental quality, community wellbeing and place identity, and their enhancement is critical to delivering high-quality outcomes across development and infrastructure over time.
- (b) Boffa Miskell supports the intent of using “well-functioning” outcomes to guide planning decisions. However, the Planning Bill goal to create “well-functioning urban and rural areas” lacks a clear definition and minimum criteria that will assist in achieving this goal. This creates uncertainty and inconsistent interpretation, and risks reducing the assessment of what constitutes a “well-functioning” area to development capacity alone. Rather, a well-functioning place should also consider a quality sense of place, natural systems performance, and long-term resilience as key outcomes.
- (c) As the Committee will be aware, the concept of a “well-functioning” urban environment is already established in national direction for urban development. Under the National Policy Statement on Urban Development (*NPS-UD*), “well-functioning” is shorthand for an outcomes bundle that is focused on enabling people and communities to provide for their wellbeing, health, and safety over time. It includes enabling Māori to express cultural traditions and norms and supporting emissions reduction and climate resilience. However, the Planning Bill goal addressing this concept, as drafted, refers to well-functioning “areas”. In our view, this framing is narrower than the established concept of a well-functioning urban environment and departs from a strong and well-established body of knowledge on assessing urban outcomes on an environments-based, systems-focused basis. It risks directing decision-making toward discrete locations rather than the integrated social, cultural, economic, and physical systems that shape

⁵ Natural Environment Bill, clause 11(a), (b) and (d).

urban wellbeing over time. At a project level, this could result in developments that meet short-term spatial objectives but generate long-term environmental, financial, or community costs.

- (d) Boffa Miskell considers that “well-functioning” should be framed and implemented using a broader “environment” lens (not just “areas”), because urban, rural and coastal settings are integrated systems where land use, water, ecology, hazards, built form, and cultural relationships interact. There does not appear to be any advantage in departing from the established concept of “well-functioning environments” in the new Bills, particularly at a point when the NPS-UD framework is just starting to deliver tangible outcomes.
- (e) As drafted, the key place-based outcomes (including the protection of identified values and characteristics of areas of high natural character within the coastal environment, wetlands, and lakes and rivers and outstanding natural features and landscapes) are not fully integrated across the two Bills. As a consequence, the Bills may result in fragmented outcomes across regional spatial strategies, land use plans, natural environment plans, and consenting decisions, rather than delivering an integrated approach to managing sensitive and valued places.
- (f) Additionally, as drafted the goals of the Natural Environment Bill focus on the management of limits – without any direction for enhancement of the natural environment. As development and population increase across the country, competition for land and resources will place ever increasing pressure on maintaining biodiversity and other natural environment values. Because natural resources are finite, environmental constraints should be integrated into development and infrastructure planning. Misalignment between the purpose and the goals risks:
 - (i) a largely reactive approach to environmental management, responding to limits once they are approached or exceeded rather than proactively enhancing natural environment values; and
 - (ii) insufficient direction being provided to plan-makers and decision-makers to pursue enhancement or restoration of natural environment values beyond minimum compliance with limits.
- (g) More broadly, such misalignment appears inconsistent with the broader reform intent of delivering improved environmental outcomes alongside enabling development.⁶ The system should therefore include explicit direction to enhance outcomes over time, for example restoring natural character and biodiversity, particularly as population and land-use pressure increase.
- (h) The Bills also risk diminishing the voice of tāngata whenua and narrowing the scope through which Māori interests are given effect across the planning system and focussing specifically on the Treaty of Waitangi/te Tiriti o Waitangi and iwi authorities (rather than the interests of Māori more broadly).⁷ The removal of sections 6–8 of the RMA creates a substantive gap by reducing the ability for Māori relationships, values, and Treaty principles to be considered directly and

⁶ Refer Explanatory notes to the Bills.

⁷ Refer clause 8 of both the Planning Bill and Natural Environment Bill.

contextually in day-to-day planning and decision-making. That gap should be addressed by ensuring that iwi and hapū input, mātauranga Māori, and ongoing relationships with place are explicitly recognised and meaningfully integrated at all stages of plan-making and regulatory decision-making.

Requested amendments

- 3.7 Boffa Miskell considers that the following amendments to the goals clauses of the Bills would more appropriately enable consideration of the key elements of a well-functioning environment and give effect to the reform objectives:
- (a) Integrate goals across both Bills so that natural character and outstanding natural feature and landscape outcomes are consistently carried through the system. Boffa Miskell considers that the same place-based outcomes should be provided for in the goals provisions of both Bills to ensure that the goals are aligned and mutually reinforcing and that place-based environmental outcomes are consistently carried through both the land-use and natural environment planning streams.
 - (b) Add explicit goals for enhancement over time, including for natural character and biodiversity. Boffa Miskell considers that goals for enhancement of the natural environment are needed in the Natural Environment Bill to maintain pace with, and improve, outcomes in light of a growing population and increasing land-use pressure. These goals can enable appropriate change without compromising environmental quality. Opportunities to restore natural character in these environments can also create climate resilience benefits and consequential economic benefits. Enhancement of natural character does not necessarily exclude development.
 - (c) Define “well-functioning” in a way that is clear and workable, with criteria that apply at different scales and recognise character, natural systems, and environmental quality. Additionally, coastal environments should be explicitly included as a “well-functioning coastal environment” lens, given their distinctive dynamics, hazards, and identity values, and the high development pressures they face.
 - (d) Recognise the rights, obligations and values of Māori as reflected in sections 6, 7 and 8 of the RMA.

4 **Part 2: Foundations – Effects outside the scope of the Planning Bill**

Provisions

- 4.1 Boffa Miskell supports the new direction in clause 15 of the Planning Bill to amend the effects threshold so that adverse effects that are less than minor will not be considered unless the cumulative effect of two or more such effects creates effects that are greater than less than minor. This is a practical improvement, as it avoids unnecessary focus on very small effects while still allowing councils to respond where many small changes add up to a meaningful impact.
- 4.2 However, as drafted, the cumulative effects provision will only operate where effects are able to be considered under the new framework in the first instance. If particular effects

must be disregarded entirely, then even significant cumulative change cannot be addressed.

- 4.3 For this reason, Boffa Miskell has identified the specific effects that the Bill proposes to disregard — including building layout (such as outdoor space), visual amenity, views from private property, and effects on landscape — as these are central to how places function and how people experience their environment. When these matters cannot be considered, there is a genuine risk that the quality, character, and liveability of everyday environments will decline over time, even where development is otherwise compliant. These effects often influence public realm quality, environmental performance, and broader neighbourhood outcomes, and ignoring them may lead to outcomes that are inconsistent with the intention of achieving well-functioning environments.
- 4.4 The effects to be disregarded from consideration by any person exercising or performing a function, duty, or power under the Planning Bill of particular concern are:⁸
- (a) the internal and external layout of buildings on a site (for example, the provision of private open space);
 - (b) the visual amenity of a use, development, or building in relation to its character, appearance, aesthetic qualities or other physical feature;
 - (c) views from private property; and
 - (d) the effect on landscape.

Operation of the proposed provisions

- 4.5 Boffa Miskell acknowledges that proposed clause 14 of the Planning Bill does not restrict the assessment of effects on: areas of high natural character within the coastal environment, wetlands, lakes, rivers, and their margins; outstanding natural landscapes and features; sites of significant historic heritage; sites of significance to Māori; and the effects of natural hazards; however, addressing the quality of our environment has core implications which extend beyond areas of high natural character and outstanding natural features and landscapes. Boffa Miskell is particularly interested in the proposed removal in the Bills of the consideration of key environmental and place-based matters in a way that could materially reduce design quality, wellbeing outcomes, and the ability to manage cumulative change, especially in “everyday” environments and for large-scale projects occurring outside of the identified natural environments.
- 4.6 The Planning Bill explicitly recognises the importance of creating “well-functioning urban and rural areas”;⁹ however, by excluding consideration of landscape effects in clause 14, there is a gap in the Bill in terms of recognising the important characteristics and landscape values which support human well-being within “day to day” urban, rural and coastal environments.
- 4.7 Boffa Miskell considers that the exclusion of the assessment of matters such as amenity, landscape effects and key aspects of outdoor living quality risks creating deficiency in

⁸ Planning Bill, clause 14(a), (f), (g) and (h).

⁹ Planning Bill, clause 11(1)(c).

the planning framework. As drafted, this creates the potential for the following unintended adverse consequences to arise:

- (a) Incremental non-compliances and “minor” changes could accumulate into widespread degradation of place, character and wellbeing outcomes, while leaving decision-makers with limited tools to respond. Over time, this may result in the quality and liveability of neighbourhoods, the public realm, and sustainable settlement patterns, including people’s ongoing connection with the surrounding natural environment being compromised.
- (b) If these effects are excluded from consideration, decisions could be made that degrade the quality of living environments for people and communities, but were otherwise ‘well-functioning’ in accordance with the goal in clause 11 of the Planning Bill. Enhancing the qualities and features that contribute towards the quality of our built environments while continually adapting to change is important to community wellbeing and a range of other community outcomes.
- (c) Removing landscape and amenity considerations at this level risks enabling poor-quality development patterns that are difficult and expensive to remedy later and does not adequately recognise the broader social, environmental, and place-based contributions such projects make beyond their economic value.

4.8 By way of example, infrastructure upgrades — such as new water reservoirs, or wastewater treatment plants — are often located, by necessity, within highly visible landscapes. Under the RMA, councils have typically required landscape assessments for such projects to understand how structures, access tracks, earthworks, and vegetation removal would affect the natural form and character of the coastline, urban environment or rural hill country. These assessments often lead to design changes such as alternative alignments, reduced structure heights, planting plans, or re-contouring to better integrate the works with the surrounding landscape, avoiding long-term adverse effects for both residents and visitors.

4.9 Under the Planning Bill as drafted, the landscape effects of such projects would be required to be disregarded entirely. Even where infrastructure is prominently visible, alters landform, or materially degrades coastal, rural, or urban outlook and character, these effects could not be taken into account at the consenting stage if they fall within a category of effect that the Bill directs decision-makers to disregard. As a result, development may be authorised in locations where it significantly diminishes landscape values, undermines visitor experience, or alters the identity of rural, coastal, or urban environments. In practical terms, this risks undermining the delivery of genuinely well-functioning environments.

Requested amendments

4.10 Boffa Miskell submits that the Planning Bill, clause 14 effects provisions should be adapted to prevent an unanticipated decline in design quality and wellbeing outcomes, including loss of visual amenity across urban, rural and peri-urban areas. Enabling consideration of these matters would support the continued delivery of high-quality developments and everyday public places that make a meaningful contribution to Aotearoa, by ensuring that development outcomes respond positively to their environmental, landscape and community context.

- 4.11 To that end, in the first instance, Boffa Miskell considers that clause 14 should be deleted.
- 4.12 Alternatively, clause 14(2) should be amended to confirm the provision does not restrict the management of matters necessary to achieve well-functioning environments, including: public realm and outdoor space quality; context-responsive character outcomes; and cumulative landscape and amenity effects in everyday environments.

5 **Part 3: Combined plan – Regional spatial plans**

Provisions

- 5.1 Part 3 of the Planning Bill sets out the provisions for the preparation of regional spatial plans including provisions that:
- (a) recognise regional spatial plans as long-term strategic instruments;¹⁰
 - (b) require consideration of environmental limits and a co-ordinated approach to development planning with infrastructure planning and investment;¹¹ and
 - (c) provide for Māori participation in spatial planning processes.¹²
- 5.2 These provisions appropriately position regional spatial plans as the foundation for subsequent land-use planning and investment decisions.
- 5.3 While Part 3 enables consideration of environmental matters, the provisions do not expressly require regional spatial plans to include:
- (a) Place and character descriptions, including elements that materially shape place and character.
 - (b) Comprehensive identification and integration of blue-green systems, including small-scale and interconnected elements such as streams, wetlands, ecological corridors, coastal margins, and urban green infrastructure.
- 5.4 There are also no minimum standards provided for the quality, currency, transparency, or accessibility of mapping and data used in spatial plans.

Operation of the proposed provisions

- 5.5 Spatial planning is fundamental to the purpose of shaping better places and effective decision-making. Boffa Miskell supports its inclusion within the proposed resource management reforms as a practical and effective way to identify the natural systems, resource attributes, and cultural relationships with places that should guide long-term development outcomes. In particular, spatial planning provides an opportunity to move beyond reactive, project-by-project decision-making by setting clear, strategic and long-term direction for integrated decision-making.

¹⁰ Planning Bill, clause 67(a).

¹¹ Planning Bill, clause 67(c)-(e).

¹² Planning Bill, clause 70.

- 5.6 Boffa Miskell also supports the provision of national direction that reflects a holistic understanding of resource management, including the meaningful integration of te ao Māori values and principles such as kaitiakitanga. When developed through genuine engagement and collaboration, spatial plans can be credible, context-responsive and publicly legitimate instruments. Spatial planning undertaken on this basis can provide clearer signals about where different forms of development are appropriate, reduce uncertainty and conflict, and support better alignment between land use, the natural environment and infrastructure over time.
- 5.7 However, Boffa Miskell considers that targeted refinements to the draft spatial planning provisions would help ensure that the full potential of the spatial planning process is realised, as:
- (a) Without specific requirements for the place and character descriptions referenced above, spatial plans risk functioning primarily as growth and infrastructure coordination tools, rather than instruments that genuinely shape and protect the distinct character and quality of places.
 - (b) Additionally, without a specific requirement to comprehensively identify and integrate blue-green systems in spatial plans, there is a risk that only large or obvious natural systems will be addressed, with cumulative loss of smaller but functionally important features.
 - (c) The effectiveness of spatial planning is highly dependent on transparent, current, and technically robust mapping. In the absence of prescribed minimum standards for mapping and data quality, there is a risk that spatial plans will be prepared based on inconsistent, incomplete, or outdated datasets, which in turn will undermine public confidence and downstream plan-making and consenting decisions.
 - (d) This risk is heightened by the compressed statutory timeframe for regional spatial plan preparation and approval. Under the Planning Bill, the first regional spatial plans must be finalised within six months of notification.¹³ Given this limited period, there is little practical opportunity to identify and correct deficiencies in mapping or data once the process is underway. It is therefore important that minimum requirements for mapping and data quality are specified at the outset, to ensure spatial plans are prepared on a robust and consistent evidential foundation.

Requested amendments

- 5.8 To ensure that spatial planning delivers well-functioning, context-responsive outcomes, Boffa Miskell submits that the spatial planning provisions should be amended to:
- (a) Specifically require spatial plans to include place and character descriptions, identification of key contributors to character and spatial representation of those matters.
 - (b) Require identification and integration of blue-green systems at regional, local, and finer spatial scales.

¹³ Planning Bill, Schedule 1, clause 5(4)(b).

(c) Insert provisions requiring that spatial plan mapping and supporting data be current, technically robust, transparent and publicly accessible.

5.9 The national direction provisions should also be amended to establish minimum expectations for place-based characterisation, environmental and landscape evaluation, and mapping standards within spatial plans to avoid the risk of continued regional inconsistency and the deferral of fundamental issues to later plan-making and consenting stages.

6 **Conclusion**

6.1 Boffa Miskell supports the overall architecture and efficiency intent of the reform, including integrated spatial planning and clearer national direction. The targeted amendments identified in our submission are intended to avoid foreseeable unintended consequences and ensure the new system delivers high-quality, context-responsive outcomes for people, communities and the natural environment over time.

6.2 We look forward to the opportunity to discuss our submission with the Environment Select Committee to address the matters raised.