

13 February 2026

Environment Committee
Parliament Buildings
WELLINGTON

By email: en@parliament.govt.nz

Kia ora

Planning Bill and Natural Environment Bill – TIA Submission

Tourism Industry Aotearoa welcomes the opportunity to submit on the Planning and Natural Environment Bills that are being considered by the Environment Committee.

While TIA does not have specific resource management expertise, we have a very strong understanding of how tourism works in New Zealand and the importance of both enabling development and infrastructure (in line with Government growth goal for tourism), while protecting and enhancing our natural environments. We bring this perspective on behalf of our members to the Committee's considerations.

TIA notes that other tourism stakeholders have submitted on these Bills, including RealNZ and New Zealand Airports Association, and TIA supports these submissions and the perspectives that they provide to the Committee.

Key Points

This submission by TIA:

- Provides overall support for the enabling intent and architecture of the reforms being enacted through the two Bills. This provides the opportunity to address issues with the current resource management system by putting in place an enduring new system. We welcome the long-term planning framework and streamlining of processes involved that will provide greater certainty to businesses, investors and infrastructure providers.
- Advocates for the positioning of tourism within the resource management system, noting that the characteristics and requirements of tourism are important for New Zealand, and yet we are not seeing these requirements reflected in the legislation. This call is based on the tourism industry as a complex system within the national economy and society (one-fifth of New Zealand's export economy).
- Provides feedback on specific aspects of the Bills from a TIA membership and tourism industry perspective, noting there is an enormous amount of detail within the Bills that TIA cannot fully cover. Tourism has a unique position as an economic driver that relies on our natural capital.

TIA's overall perspective is essentially one of balance. We appreciate the changes and structures to streamline processes and introduce a planning framework. On the other hand, some aspects that are important for tourism, such as environmental integrity, landscape values, amenities and local expression of destination, are not expressly accommodated in this legislation. TIA contends that these tourism-relevant factors are meaningful for tourism, and therefore the national economy, and should be considered in our resource management system.

Tourism Industry Aotearoa

TIA is the peak body for the tourism industry in Aotearoa New Zealand. With around 1,200 member businesses, TIA represents a range of tourism-related activities including hospitality, accommodation, adventure activities, attractions, retail, airports and airlines, transport, as well as related-tourism services.

TIA is sharply focused on ensuring the balanced growth of tourism, and this is clearly articulated in our key guiding documents and programmes. This includes the tourism industry's strategic framework, *Tourism 2050 – A Blueprint for Impact, He Pae Tukutuku*.¹

This has the Vision of 'Enriching Aotearoa New Zealand through a flourishing tourism ecosystem'. This Vision is centred on the positive role of tourism for the broad betterment of New Zealand and its people across a balanced framework – Economic, Community, Visitor and Environment.

TIA works to advance the progress of tourism in the interests of the industry and the wider society given the many positive attributes that tourism generates for New Zealand, such as employment, business opportunity, regional spread, and the ability to generate value from our rich natural resources.

Tourism as economic driver

Tourism is a major part of the New Zealand economy as set out in Stats NZ's annual Tourism Satellite Account.²

Indicator for YE March 2024	Value	% of NZ Total
Total expenditure	\$44.4b	
International expenditure	\$16.9b	
Domestic expenditure	\$27.5b	
Total GDP (direct and indirect)	\$28.7b	7.5%
Tourism exports	\$16.9b	17.2%
Total Employment (direct and indirect)	303,420	10.7%

The contribution of tourism to exports is particularly important and will only increase given ongoing pandemic recovery and the Government's goal to double tourism exports by 2034.³

In terms of how tourism exports sit in relation to other sectors, Tourism exports of \$16.9b (YE March 2024) are only behind Dairy (\$21.1b), and well ahead of Meat Products (\$8.7b), Wood (\$5.8b), Fruit (\$3.7b) and Seafood (\$1.9b).

These datapoints serve to highlight the responsibility we have to ensure that the tourism industry is carefully factored into all laws and regulations that impact upon it, including our resource management system.

Tourism in relation to the Bills

Having established the size and contribution of tourism, it is important to consider this industry in relation to our planning and resource allocation processes:

- As a user of natural and built resources right around the country, tourism welcomes anything to make the resource management system easier and quicker to deal with. Tourism is a highly capitalised industry across many sectors that engage with our resource management system, including aviation (airports and airlines), accommodation, activities, sea and land transport, and others. This means that the

¹ <https://www.tia.org.nz/tourism-2050/>

² <https://www.stats.govt.nz/information-releases/tourism-satellite-account-year-ended-march-2024/>

³ <https://www.mbie.govt.nz/immigration-and-tourism/tourism/tourism-growth-roadmap>

operators involved rely on investment in all sorts of constructions, facilities and developments. Making this clearer, faster and less complex, is welcomed across the tourism industry and will likely stimulate increased investment.

- Tourism is a powerful agent of growth in the New Zealand economy, and this growth is sought by both Government and industry. But at the same time, the industry position is that this growth must be attained on the right terms: sustainable, well supported by New Zealanders, highly appreciated by our visitors, and inherently positive for our biodiversity and natural places. In short, balanced.
- Tourism is driven by the experiences of visitors at 'place' which is typically a combination of the natural and built environments, and the people and businesses that host and enable this visitation. Tourism occurs within communities right across our country meaning that the quality of 'place' is inherently associated with the success of tourism. This can mean that tourism is vulnerable to factors that negatively impact on destination quality, such as environmental degradation, inappropriate development and under-investment in the things that matter for tourism – infrastructure, amenities, landscapes, cityscapes, communities, cultures, biodiversity, clean waters, and others. On the other hand, tourism requires and benefits from quality developments and infrastructure, meaning that on both counts, tourism has a direct stake in how New Zealand's resource management system performs.

This also means that there must be an ability in the resource management system for communities and businesses at place to have their say on matters that impact the nature and quality of their destination. National instruments as we understand them will be high level and therefore unlikely to deliver this local and regional expression. While the processes set out to develop the Regional Plans will permit this local input, we consider that ongoing engagement opportunities will be important for the ongoing success of the system being established.

Tourism's overall interest is to ensure that the resource management system we establish understands tourism and its characteristics and therefore can enable the development and investment that the industry needs over time, from large-scale infrastructure to the many smaller developments that contribute to the attractiveness of destinations across our country.

Specific feedback

The Bills set out the architecture of the proposed resource management system, with some finer details on how it will work. We appreciate that while much detail will come from the development of the National Instruments and Regional Plans, it is very important that the Bills accurately embed the overarching architecture and provide clarity in the wording and definitions that will endure over the life of this legislation.

Within the Bills, there are many areas of interest to TIA and its members:

1. **Clarity around Purpose and Goals.** TIA considers that the role of the legislation is to clearly and unambiguously set out the design of the system and critical permanent aspects and requirements. The legislation must be enduring, even as other elements such as the National Instruments and Regional Plans can change overtime. This clarity will serve to reduce the downstream debate and litigation that occurred with the Resource Management Act.

With this in mind, TIA is concerned that the Purpose and Goal statements in the Bills create uncertainty and ambiguity. While we understand the role each Bill will play, how they will work together is unclear from the Purpose and Goal statements, and whether either one has precedence.

For example, the Purpose for the Planning Bill *'...is to establish a framework for planning and regulating the use, development and enjoyment of land'*, whereas the Purpose for the Natural Environment Bill *'...is to establish a framework for the use, protection and enhancement of the natural environment'*.

Conceptually, these are quite different and there is no indication of how they relate to each other. This is compounded when considering the Goals for each.

For example, the Planning Bill includes a Goal to *'...protect from inappropriate development'* even though 'protect' is not within the ambit of the Purpose.

The Goals of the Natural Environment Bill have no reference to 'protection and enhancement' aspects of its Purpose. The most relevant Goal is *'to achieve no net loss in indigenous biodiversity'* (subclause d) which is a low standard where environments and biodiversity are already degraded across our country. One Goal does state *'... within environmental limits'* (subclause a) but as the National Standards have yet to be developed, we do not know what these limits will be.

TIA recommends that the Committee review the Purpose and Goal statements to ensure they are consistent in how they are expressed in each Bill (Planning Bill to enable planning and development within limits, and the Natural Environment Bill to ensure protection and enhancement of the natural environment). For each Bill, the Goals need to reflect the Purpose statements.

- 2. Industry input and engagement.** TIA appreciates the logic of the 'Funnel' model used that cascades from legislation to the national policy directions and standards, to the regional plans, through to consents and permits. In this, we appreciate that the National Instruments and the Regional Plans will be informed by stakeholder input, including from the business community.

However, TIA also sees that an inverse funnel is relevant where bottom-up and granular information informs both the initial development of National Instruments and Regional Plans and the ongoing operation of the system. To cut stakeholders out of ongoing engagement and input is challenging particularly where industry input will serve to strengthen the instruments created, and to ensure they function well over time.

With the Regional Plans being limited to what is contained in the National Instruments, differentiated local views will struggle to be included. This is particularly consequential for tourism where destination quality, diversity and character is important. For instance, how would the combined Regional Plans for Otago account for the needs and wishes of communities in different parts of the region, such as Dunedin and Queenstown. Or, more granularly again for Queenstown, Arrowtown and Wanaka? Such granulated local views must be able to be accommodated in how the system operates.

Also, many councils currently have specific instruments in place to enable tourism, and it is not clear where these will sit in the new system. For instance, in Queenstown with Ski Area Subzones (SASZ) and Rural Visitor Zones, and others. We are not sure at this stage whether standardised zones will provide for this sort of specific circumstance, and we will engage in the process at the appropriate time as these are developed.

The change to the Regional Council level for operating the resource management functions itself is a major shift, and one that can be seen as further reducing the local voice and participation in the system, particularly with the constrained ability to object to individual resource applications or to appeal decisions made.

TIA recommends that the Committee strengthen the engagement mechanisms in the Bills to ensure the system is appropriately informed by relevant stakeholders, including tourism and infrastructure providers. TIA seeks specific wording in the legislation to specify this engagement through the development and implementation of the system being established.

- 3. Including tourism attributes.** TIA notes that the Bills are largely silent on some attributes that are important to tourism, including amenity, landscape and recreation values. For TIA, the destination is everything that visitors experience at that place, and this is typically a result of the public and private lands and waters that make up the local landscapes, cityscapes and the facilities, infrastructure and amenities that visitors engage with. This makes the holistic nature of a place very important for visitors and locals alike.

Given this, TIA is interested in ensuring that the resource management system being established factors these attributes into its overall framework. Without consideration of this holistic perspective, there is risk that the distinct needs and requirements of the tourism industry will not be met by the system being established.

TIA recommends that the Committee ensures that attributes that are important to tourism are appropriately incorporated within the overall resource management framework, including within the National Instruments, noting that these will cascade to the Regional Plans.

- 4. Timing.** TIA welcomes the introduction of various national and regional instruments. However, we are not convinced that they can be put in place as quickly as envisioned, particularly at the regional levels. For instance, TIA notes that Spatial Plans will need to be in place after six months to allow the natural environment and land use plans to be developed. Given the new regional level, the need to start afresh for most regions, the likely paucity of data and the need to consult with businesses, landowners and communities, the rapid development of Spatial Plans will be challenging to achieve in the window available. Also, with Regional Councils likely to be undergoing significant change processes over the next few years, their capability to operate the processes to develop their plans is an area of uncertainty.

With tourism growth being a goal for both Government and industry, a measured approach will best allow tourism input to be factored into the development of the various instruments that establish key platforms for the overall system.

TIA recommends that the Committee allows more time for the development of the Spatial Plans as these will set the long-term trajectory for each region and will allow the Natural Environment and Land Use Plans to be delivered. TIA sees the Spatial Plans and their role as the long-term planning instrument to be critical to the overall success of the system, making it important to invest the time and effort to do them well.

A number of elements are inherent to the reforms, and TIA supports their inclusion, particularly around the digital enablement of the processes and tools that will be used by regions; and the national policy directions, risk data and analysis that will support hazard assessment and management within the system.

Finally, TIA recognises that the steps to be taken once the Bill is enacted will be critical, initially with the National Policy Directions and National Standards, and then the Regional Plans. These documents will establish what the policy direction will be, what the national standards will include, and the levels to be set. We anticipate that these will inform how such matters as cumulative impact and externalities are specified and managed, and TIA will actively participate in these processes, as will communities and businesses across the country.

Conclusion

TIA supports the resource management reforms. We believe that legislation will establish a sound basis for developing and protecting our country over the long term.

With tourism being a distinct and important part of the economic and social fabric of our country, TIA considers it imperative that the system being established will enable and support visitor-related activities, noting that the industry requires ongoing investment and development, much of which falls within the ambit of our resource management system.

Given this, TIA's overall recommendation to the Committee is to ensure that the specific and unique characteristics of the tourism industry are recognised in the Bills in the interest of ensuring that the foundational legislation for this critically important new system is well set from the beginning.

TIA requests the opportunity to speak to the Committee on this submission. Please contact Bruce Bassett, Chief Advisor, at bruce.bassett@tia.org.nz or 021 609 674.

Thank you for your consideration of this submission.

Ngā mihi,

A handwritten signature in blue ink, appearing to read 'R Ingram', followed by a period.

Rebecca Ingram
Chief Executive