

3 October 2016

Steven Bailey  
Inquiry Director  
Better Urban Planning Inquiry  
New Zealand Productivity Commission  
PO Box 8036  
The Terrace  
**WELLINGTON 6143**

Dear Steven,

**BETTER URBAN PLANNING INQUIRY  
PALMERSTON NORTH CITY COUNCIL SUBMISSION**

Thank you for the opportunity to lodge a submission on the Better Urban Planning draft report dated August 2016.

Due to the pending local government election, this submission has been approved by the Deputy Chief Executive, but is consistent with other submissions made by Palmerston North City Council (PNCC) on national planning documents.

The submission is based primarily on the overview produced to support the Better Urban Planning draft report. General introductory comments are also provided.

**Introductory Comments**

1. Palmerston North City is experiencing positive economic growth and has successfully used the existing planning framework to set up a blueprint to accommodate this growth. While some minor amendments could be made to improve the existing planning framework, the Palmerston North experience is that it can be made to work.
2. The following factors have been important to urban planning in Palmerston North:
  - a) Adequate resourcing of planning teams and the appointment of appropriately qualified and experienced planning officers in local government.
  - b) Giving planners the mandate to lead and influence critical urban planning decisions at the appropriate time.
  - c) Promoting a strong culture of continued professional development amongst planners to ensure ongoing improvements are made to planning practice.

- d) Ensuring elected members and the community set the big picture within the context of the legislative planning framework prior to District Plan development.
  - e) Supporting participation by elected members in decision making on District Plans to ensure the direction set is not lost amongst the technical evidence and submissions.
  - f) A clear differentiation between the role of elected members and planning officers, particularly as it relates to resource consent decisions and enforcement.
  - g) Appropriate input from experienced technical experts in a manner which reinforces the role of the planner in making the broad overall judgement.
  - h) Planners working on processes beyond the realms of the RMA and LGA to ensure good urban planning outcomes.
  - i) Once the big picture direction is set, proceeding with District Plan development in bite size chunks in order to manage the quality of the work and focus resources on strategic priorities. PNCC has almost completed its Sectional District Plan Review and is yet to receive any substantive appeals.
  - j) Taking advice from recognised international experts such as Charles Landry and Peter Smith who have proven experience in understanding what makes a high performing city. Charles Landry completed a report titled 'Palmerston North: Comfortable or Captivating' which supports a number of the approaches that are discouraged in the Better Urban Planning draft report, e.g. more emphasis on urban design principles. Peter Smith has been assisting Palmerston North with increasing the vibrancy of the city centre. Both experts tend to focus on what urban planning means for people using places as opposed to the legal processes and procedures that direct urban planning.
3. PNCC also makes the following general introductory comments:
- a) While costly, the Environment Court plays a very important role and is a necessary evil to address poor planning practice, abuse of the process or highly contentious issues. Trying to avoid the Environment Court by making local hearings overly formal like the Auckland independent hearings panel is not necessary for the large majority of hearings. Councils should not regulate private property rights without the ability for someone to review the process in full.
  - b) Many urban planning issues will continue to be difficult in the future and divide communities regardless of what the law says or a District Plan requires. The competition for scarce natural and physical resources will only intensify in the future. Parts of the report seem to imply a change in the planning framework will make urban planning easier. A resident who is being kept awake because of a noisy wind farm isn't that interested in what the law says.



- c) A lack of national direction has not been the problem. Part 2 of the RMA provides the necessary national direction. The National Policy Statements produced to date have simply highlighted the tensions of particular issues which planners working at the local level already understood. The call for more national direction was really a call for someone else to make the difficult decisions. If local government wants to retain local decision making it needs to be bold enough to make the difficult decisions itself.
- d) Market based or effects based planning within first generation district plans didn't work. Individuals make decisions for their own best interests whereas urban planning is seeking to achieve outcomes that are most beneficial to the City as a whole. Bad examples of market based planning include extremely poor connectivity in new greenfield areas, blank walls in city centres which have negative externalities on other businesses in the area, or out of centre developments which can quickly undermine decades of planning and public and private investment in a city centre.
- e) Centres based regimes are critical, particularly within small to medium sized New Zealand cities. The perception of a city is based significantly on the vibrancy and success of its centre. Local communities expect a strong city centre and resent dying streets and empty shops. Many city centres are very fragile and one poor planning decision on a major development can undermine a centre for decades. There are many examples of this in New Zealand and overseas. The specific office and retailing needs of activities or communities located outside of a centre such as airports, universities and suburban centres do need to be acknowledged and provided for. Existing buildings are physical resources and need to be sustainably managed. Encouraging cheap construction on lower cost land without public amenities to the detriment of the existing physical resources in a city centre does not meet the purpose of the RMA 1991.
- f) Urban design provisions in District Plans are very important and are not just about making things look pretty. Poor urban design has negative externalities. For example, poor connectivity means people don't walk or cycle; blank walls in a city centre kill surrounding businesses; and inappropriate out of centre development creates car dependent shopping and undermines community expectations regarding city centres. Some of the most successful urban developments in New Zealand which have contributed significantly to the economic development of those areas have been carefully orchestrated at every stage based on urban design principles. The problem is people don't see the careful design that occurs to create successful places. They assume it just happens, for example the Auckland waterfront and Hobsonville residential development. The Better Urban Planning report describes urban design provisions as vague and ambiguous which simply demonstrates a misunderstanding of the role and value of urban design by the authors.
- g) PNCC is happy to provide the Productivity Commission with photographic examples of poor outcomes under the old District Plan and the positive outcomes achieved under the new District Plan which incorporates stronger

urban design provisions. Alternatively, PNCC would be happy to host the Productivity Commission in Palmerston North in order to visit the good and bad examples and discuss the matters over an informal presentation.

- h) An overly permissive planning regime is counter intuitive. Shifting to a more permissive planning regime typically means a tighter development envelope to manage the potential effects of the activities listed as permitted. If something has to be approved without any planning assessment at all, the natural reaction is to be conservative with the extent of what is permitted. A permissive planning regime is a bit like taking a child to the mall and saying you can pick anything you like from the \$2 shop. While they can pick anything, their options are limited to the \$2 shop. A discretionary resource consent would allow the child to explore the other shops. Logic would say developers would apply for a discretionary resource consent to extend the development envelope but they don't – instead they prefer to build to the permitted development envelope to avoid resource consent, i.e. they generally pick something from the \$2 shop. Developers see resource consents as an unnecessary cost as opposed to something which is generally approved and can increase their ability to use a resource.
- i) A permissive or market-based planning regime can create greater uncertainty and hinder investment. While it means individuals may have greater flexibility it also means competitors have greater flexibility which can discourage investment. A major retailer advised PNCC that investing in Palmerston North's city centre over other provincial centres was a good business decision because they understood the planning regime meant a competing retail area could not be established in another location after the investment was made. In this case the centres based regime aided with investment. It is not anti-competitive because there is plenty of vacant retail and office space available in the city centre.
- j) One of the ironies with an effects based planning regime as opposed to a traditional activity listing approach is the planner needs to anticipate the types of activities which are going to occur in certain locations in order to predict the type of effects which need to be managed. This begs the question as to whether or not activity listing is a more efficient approach.
- k) Planning rules are often cited as the reason particular developments or forms of development do not happen, e.g. medium density housing. PNCC actively encouraged a local developer to proceed with a medium density housing development by funding the design and indicating support for a resource consent. Despite this support, a more traditional form of housing which supplied 50% less dwelling units was advanced. It appears the real reason the medium density development didn't proceed is the traditional form of housing was quick and cheap to build and was well understood by the developer and the market.
- l) PNCC support changes which reinforce the role of spatial plans and provide stronger links between the LGA and RMA to assist with long term planning.



4. PNCC is willing to meet with the Productivity Commission to discuss the points above in more detail.

### **Palmerston North City Urban Planning Context**

5. The 2015 PNCC Long Term Plan projects that the City will require land for an average of 300 new households per year over the next 20 years. PNCC has projected an increase in the preference for smaller more affordable infill or medium density housing and a reduced preference for greenfield housing. The NPS for urban development capacity lists Palmerston North as a medium growth area. PNCC is also experiencing strong growth in retail, logistics, health and education.
6. PNCC developed its first generation RMA District Plan between 1995 and 2000. Between 2000 and 2010 PNCC processed approximately 40 changes to its operative District Plan to keep it up-to-date, including a number of private plan change requests. Like a number of district plans of its time it included a mixture of effects based and activity listing provisions. It was also a very permissive District Plan which has resulted in some very poor urban outcomes with a variety of externalities which have impacted on the success of the City.
7. In May 2010 PNCC took advantage of the 2009 amendments to section 79 of the RMA and formally launched its Sectional District Plan Review (SDPR) titled "Shaping Our City – Creating a Sustainable Future". PNCC are now in the final stages of completing its SDPR.
8. PNCC has four major land-use strategies which have been prepared to direct the future growth and development of Palmerston North. The land-use strategies provide specific direction for future residential, rural-residential, industrial, and retail growth and have been prepared with significant input from elected members and the local community to ensure future development builds communities in a manner consistent with Council's overall vision that "Palmerston North is recognised as a vibrant, caring, innovative, sustainable and prosperous city". The Regional Land Transport Plan has been prepared taking into account these land-use strategies.
9. In Palmerston North, elected members and the local community have engaged effectively and over time have worked hard to ensure that the District Plan reflects the best possible approach to dealing with the challenges and requirements of the local community. It is important that residents are encouraged to continue these roles to determine and take charge of the future planning for their community.
10. In addition to its overarching Sustainable City Strategy, PNCC has also developed a successful Urban Design Strategy (UDS) that contains eight key initiatives aimed at transforming the quality of the urban environment within Palmerston North City. PNCC is making excellent progress on the implementation of the eight initiatives. The SDPR has included a number of the initiatives, e.g. structure plans and design criteria for major developments, to implement the eight key initiatives of the UDS.

11. In 2012 PNCC completed a successful boundary adjustment process with the Manawatu District Council to ensure it has the jurisdiction to act on its land-use strategies and the Regional Land Transport Plan.
12. PNCC's Asset Management Plans and Development Contributions Policy have been developed to give effect to the broad strategic direction detailed above and to ensure that Council collects the costs of growth from new development, rather than existing ratepayers.
13. The PNCC SDPR is also operating within the context of the completed One Plan, the consolidated Regional Policy Statement, Regional Plan and Regional Coastal Plan for the Manawatu-Whanganui region (One Plan). Substantial community investment has gone into the development of the One Plan which establishes a clear framework for achieving the sustainable management of the region's natural and physical resources.
14. Since May 2010 PNCC has publicly notified 21 District Plan Changes as part of its SDPR. A large focus of the SDPR has been to give effect to the four land-use strategies to provide a clear framework for the future growth and development of Palmerston North. Through the SDPR PNCC has rezoned or is in the process of rezoning:
  - An additional 60 hectares of residential zone land. The city now has 15 years of residential land supply available.
  - An additional 126 hectares of industrial land for large format industrial activity and 33 hectares of land for diary related industrial activity to meet demand over the next 20 to 30 years.

The SDPR, enabled by the 2009 amendments to section 79 of the RMA, has proved to be a very successful approach to improving RMA plan agility.

15. As part of the Sectional District Plan Review PNCC has proposed to provide for "minor or second dwellings" as a permitted activity on a site with an existing dwelling without the need for subdivision and separate services. The intention is to meet the growing demand for small affordable accommodation which is not typically being met by the development sector. It is anticipated that it may also provide an income supplement to first home buyers assisting with overall housing affordability.
16. PNCC is also looking at incentivising well-designed medium density residential development via the use of the restricted discretionary activity status together with a non-notification clause. To date medium density development within the City has not been well supported by the local development community. PNCC believe that poor design and poor site selection for existing medium density developments has contributed to this problem. The proposed approach is that, provided the development goes through a design review process, it will not require the written approval of neighbours. The feedback we have received from the development community is that they would prefer to have conversation with PNCC



regarding design as opposed to going to their neighbours for sign off on a particular medium density development.

### **Palmerston North's Centres Based Retail Regime**

17. The rationale sitting behind Palmerston North's centres based retail regime seems to be misunderstood by the authors of the report. When evaluating the most efficient and effective method(s) to manage the physical resources that make up a city's business areas a Council has to carefully review:

*How a city might best meet its obligations under the RMA, while managing the fundamentally conflicting issues of enabling activities and communities and not undermining existing resources.*

18. Not often recognised in Part II of the RMA is the requirement for Council's to promote the sustainable use and development of physical resources in a way and at a rate which enables communities to provide for their social and economic wellbeing. In Palmerston North this meant providing for large format retailing (LFR) in a way and at a rate that created opportunities for LFR while not undermining the physical resources, both private and public, that make up the city centre. By way of comparison, a business would not promote growth in one part of its business in a way that fundamentally undermined the core parts of it. Such an approach would not be fiscally prudent or financially sustainable.
19. The Council's Retail Strategy was initiated in response to market criticism of:
  - A shortage of large lot and vacant land in the city centre to provide for LFR; and
  - District Plan rules allowing dispersal of retailing to the fringes of the City.
20. It is noted that natural and physical resources include the investment in land, buildings and businesses that make up a city's business areas. There are potentially serious consequences if significant areas of retail activities (and other activities usually found in a city centre) are able to locate in inappropriate locations, or if pedestrian based comparative retail in a city centre is allowed to disperse and agglomerate to the fringes of a city. Consequences can include:
  - The creation of wide-spread vacancies within a city centre, which may result in reduced security, increased anti-social behaviour, and loss of amenity;
  - A reduction in the critical mass required to support commercial, social and community services which are dependent on the areas within which they are located, continuing to function as retail centres. For example post offices, banks, medical centres, libraries and welfare offices;
  - The loss of the city centre's physical (building) resources and infrastructure;
  - The inefficient use and unnecessary duplication of public resources and infrastructure;

- Less efficient transport patterns; and
  - A general loss of amenity and vitality.
21. PNCC's Retail Strategy is anchored in the District Plan and is underpinned by the overall objective to achieve the sustainable use and development of physical resources within the City's business areas. The Plan's hierarchy of business areas actively manages the distribution, scale and form of business activities throughout the City so that LFR does not create retail dispersion from the city centre.
22. The framework of regulatory control managing the City's business areas is flexible and responsive to ongoing change in the methods of delivery of goods and services by businesses. However, the regulatory controls manage this dynamic in a way that does not disenable the community through the undermining of existing physical resources.
23. On the ground the centres based approach has been endorsed by the market. Over the last eight years approximately 15,600m<sup>2</sup> of gross floor area (GFA) retail activity has located progressively closer to the city centre. Approximately 4,215m<sup>2</sup> of GFA has moved from business areas on the fringe of the city centre into the core, and 11,404m<sup>2</sup> has moved from disparate industrial locations into fringe business areas within 300 to 600m of the city centre. This is in addition to a 10,000m<sup>2</sup> GFA expansion to the City's integrated shopping mall located in the core of the city centre.
24. The report claims that some district plans see a reduction in competition as a beneficial outcome from the planning system.<sup>1</sup> The report notes Palmerston North's District Plan attributes the success of its inner business area, "amongst other things", to the absence of strong competition from competing suburban centres due to previous commercial containment policies.
25. When assessing the regulatory framework of district plans and drawing conclusions on the merits of the guiding policy approach – understanding the local context is critical. Amongst other things, the Council's 2003 Retail Study notes the following characteristics of the City have removed the need and commercial incentives for large integrated retail centres in suburban areas including:
- The City's compact development form;
  - The true centrality of its city-centre;
  - Retailing, and commercial activity in general has focused in and around the historical city-centre and gradually has gradually expanded around the core; and
  - The ease of access to the city centre from all parts of the City

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<sup>1</sup> See Chapter 7, F7.2 of the Report.



26. For a city with a population of 85,000 the main urban area of Palmerston North is highly compact. The distance from the city centre to the fringe of the urban area is 2km to the south, 2km to the south and 6.5km to the west. The urban form of a city is a critical driver of how the city functions. Understanding how urban form impacts on where businesses choose to function within a city is a critical consideration when evaluating the merits of a policy approach. In this policy area, the Plan's approach is not driven by a desire to reduce competition. The approach is more complex and multi-layered than the authors' very simplistic analysis of the issue. The report does not appear to be cognisant of the local context within which this issue sits in Palmerston North.
27. The report considers business specific zone restrictions limit the ability of cities to evolve in response to changing preferences. Palmerston North's Fringe Business Zone (FBZ) is used as an example of a regulatory approach that limits the extent of use for activities such as food and beverage outlets and office activity.
28. Again, understanding the local context is critical when analysing and reaching conclusions on the policy approach of a particular District Plan. The FBZ provides for LFR in a location in close proximity to Palmerston North's city centre. The attributes of the Zone that made it suitable for LFR are as follows:
- The land was in close proximity and contiguous with business zone land close to the city centre;
  - Land parcels were of a sufficient size so that barriers to land aggregation were low;
  - The capital investment on the land was coming to the end of its economic life and land to capital ratios were low; and
  - The land fronted key arterial roads that provided the required levels of service needed for vehicle orientated and destination specific LFR.
29. Because of these attributes FBZ land represents a relatively scarce resource. The opportunities to easily aggregated land with low capital values fronting arterial roads so close to the city centre does not exist anywhere else in the City. It would be an inefficient use of this resource to allow food and beverage outlets and office activity to crowd out LFR in the FBZ. The Zone provides for these activities, but ensures LFR and complimentary activities use the scarce resource. Choice is not restricted in Palmerston North for these activities, there is a generous supply of land and buildings in the City's other business zones to provide opportunities for these activities.

### **Better Urban Planning Overview – What makes a high-performing city?**

30. The quality of the natural environment is mentioned and is important but there is no mention of the quality of the built environment which is a major issue in New Zealand. The quality of the built environment plays a significant role in the liveability of cities. The importance of social, cultural and creative vibrancy

is also mentioned. These things generally do not happen unless they are carefully curated at every stage. A visit to most large format retail areas in New Zealand will quickly demonstrate that the market is not interested in providing social, cultural and creative vibrancy. Urban design principles are important in achieving the vibrancy that is so critical to a high-performing city.

### **Better Urban Planning Overview – Planning can contribute to wellbeing**

31. PNCC agree that planning can contribute to wellbeing. PNCC disagrees with the comment that attempts to steer cities in a particular direction can be harmful – this is the fundamental role of urban planning. PNCC agree that flexibility and responsiveness in urban planning is important, particularly in mixed use areas such as city or suburban centres. However, too much flexibility can undermine existing physical resources and undermine the social, cultural and creative vibrancy identified as being important to a high-performing city.

### **Better Urban Planning Overview – Urban trends in New Zealand**

32. PNCC has seen a significant change in preference for more centrally located small dwellings. This reflects the ageing population and the desire to be close to services and facilities as opposed to sprawl locations with limited services and poor public transport. As noted previously, in order to accommodate this change PNCC has recently made changes to the District Plan to enable minor dwellings as a permitted activity and medium density housing as a restricted discretionary activity with a non-notification clause, subject to design review.

### **Better Urban Planning – A diagnosis of the current planning system**

33. The report notes the RMA has failed to deliver plans with tightly targeted controls that have minimum side effects. The reason for this is most effects based plans have failed to deliver on their intended objective.
34. PNCC disagrees with the statement that the current system makes the resolution of conflicts harder than it should be. As previously noted, it doesn't matter what the law or the District Plan says, planning issues such as wind farms on a local landscape or urban intensification in a heritage area will always be difficult for those affected by such proposals.
35. PNCC disagrees with the statement that it is unclear what a council should do when it faces conflict between different national instruments. It is very clear what the planner is required to do in this instance. The role of the planner is to weigh up the law, the relevant policies, the technical evidence and any submissions and make a broad overall judgement on the merits of the policy or proposal. While difficult, that is what is required. There is no silver bullet to that process as each case is generally unique.
36. PNCC disagrees that the planning process is unresponsive. Provided the matters identified in the introductory comments of this submission are addressed, the current planning process can be made to work. Like most things, it is how it is used, or the quality of the planning practice that is most critical.



## **Better Urban Planning – What changes are required?**

### **Clearer distinction between the built and natural environment**

37. PNCC supports a stronger distinction between the built and the natural environment. This is likely to place greater emphasis on the built environment, in particular the quality of the built environment and the importance of urban design principles – something the report identifies as an area of concern.

### **More responsive infrastructure provision**

38. The fundamental issue with more responsive infrastructure provision is a shortage of funding and an unwillingness by the various parties involved in urban development to pay for infrastructure. Many councils are stretched financially. The Government has its own priorities which do not always align with local infrastructure needs and developers generally resent paying development contributions. PNCC would support funding mechanisms which are more targeted or user pays provided it does not result in a situation where infrastructural levels of service start to vary significantly across a city. There is a risk a user pays approach to infrastructure will increase inequality with access to certain public services and facilities only available to those who can afford it.

### **A more restrained approach to land use regulation**

39. This matter is covered in the introductory comments of this submission. PNCC has experienced first-hand the consequential effects of market based or effects based planning. While a variety of activities should be promoted in certain locations such as the city centre, other locations such as residential zones need to be carefully managed to maintain amenity or manage distributional effects which could undermine the city centre.
40. Describing urban design provisions as vague aesthetics rules and policies simply demonstrates a poor understanding of the role and value of urban design by the authors of the report.

### **Stronger capabilities within councils and central government**

41. PNCC agree that economics has an important role to play in urban planning and it is an important capability within local government. However, unlike the Better Urban Planning report, economics should contribute to planning decisions alongside a number of other technical disciplines. PNCC has been promoting multi-disciplinary working on all urban planning projects. For example, Shamubeel Eaqub recently provided economic evidence for PNCC to support increased land use controls to limit rural subdivision on high class soils. The long term economic value of high class soils outweighs the short term economic benefits of subdivision. Despite this, the market was favouring subdivision as landowners were thinking about their own individual circumstances as opposed to the needs of future generations – that is the role of planning. The new policy ensures the overall supply of rural subdivisions is not limited with an ample supply of land identified for rural subdivision outside

of the high class soils. The economic evidence sat alongside evidence from a soil scientist, rural productivity expert, landscape architect, traffic engineer and water engineer. The planner provided the overall broad judgement and recommendation.

### **A future planning framework**

#### **A presumption that favours development in urban areas, subject to clear limits**

- 42. The RMA already enables development and changes in land use, the provision of sufficient development capacity, and the mobility of people and goods.
- 43. PNCC submit that there is already a Government Policy Statement. It is Part II of the RMA 1991.
- 44. A number of the infrastructure mechanisms proposed would assist with the transition of infrastructure to private providers which PNCC oppose.

#### **A clearer set and hierarchy of priorities for the natural environment**

- 45. A clear set and hierarchy of priorities for the natural environment already exists in Part II of the RMA.
- 46. PNCC support greater collaboration with central government on climate change. The current government provides very little, if any, support for climate change. The Ministry for the Environment pulled its funding of ICLEI, which was a useful resource for councils.

#### **Infrastructure pricing and funding that more accurately reflects actual costs, use and impacts.**

- 47. PNCC support the general intent behind this change. Such an approach is likely to increase the cost of development in greenfield areas which is proven to be significantly more expensive to service than infill development. The introduction of development contributions in 2002 has assisted with highlighting the true costs of growth, particularly within greenfield areas.

#### **Rezoning and regulatory change that adapts more rapidly to circumstances**

- 48. Many of the tools cited can already be used. Councils can utilise deferred zoning, spatial plans and land-use strategies to assist with the staged release of land. PNCC recently introduced a rule in a greenfield industrial area which released more land for development once certain infrastructure is put in place.

#### **A focus on those directly affected by the change, not third parties**

- 49. This already happens. Schedule 1, clause 5 requires councils to serve public notice on parties directly affected by a plan change. While others may submit, the new vexatious submitter provisions and \$500 fee for an Environment Court appeal has discouraged abuse of the process. PNCC has completed 21



plan changes in the last 5 years and the large majority of submitters involved are directly affected parties.

### **A different role for the Environment Court**

50. As previously discussed, while costly, the Environment Court plays a very important role and is a necessary evil to address poor planning practice, abuse of the process or highly contentious issues. Councils should not regulate private property rights without the ability for someone to review the process in full.

### **More representative, less rigid consultation**

51. This is what happens now and/or is being proposed as part of the most recent RMA Bill.

### **Continued recognition and protection of Maori interests**

52. Support.

### **Spatial planning as a core, and fully integrated, component**

53. PNCC support changes which reinforce the role of spatial plans and provide stronger links between the LGA and RMA to assist with long term planning.

### **Central government as a more active partner in the planning process**

54. Local government should make decisions that affect local communities. Central government can and has set priorities via Part II of the RMA. As previously noted, the calls for further national direction were actually a call for someone else to make tough decisions. If councils want to retain local decision making they need to be prepared to make difficult decisions locally and consistent with the national direction provided in the legislation.

### **Legislative separation of planning and environmental protection**

55. PNCC support a stronger distinction between the built and natural environment. This is likely to place greater emphasis on the built environment, in particular the quality of the built environment and the importance of urban design principles – something the report identifies as an area of concern.

### **Centralisation of environmental enforcement, or greater oversight of regional councils**

56. PNCC is aware that there is some public concern regarding interference in environmental enforcement, particularly with respect to water quality. For example, the recent challenge from Forest and Bird and the Environmental Defence Society regarding implementation of the Horizons Regional Council One Plan.

If you have any questions or require further clarification please contact David Murphy, City Planning Manager on 06 356 8199.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'R. Swadel', written in a cursive style.

Ray Swadel  
**DEPUTY CHIEF EXECUTIVE**