



Auckland Branch NZPI
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3 October 2016

New Zealand Productivity Commission,
PO Box 8036
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Wellington 6143

Submission on Better Urban Planning: Draft report

The Auckland Branch of NZPI makes the following comments on the draft Better Urban Planning report

1. Overview

We note and support the Commission's acknowledgement of the critical role cities and towns play in the national economy and people's wellbeing and the role urban planning plays in achieving these goals.

In Auckland we are very aware of the need to effectively integrate land use, transport and infrastructure both in practice and legislation. We would argue this is one of the critical roles affective urban planning can play leading to increased efficiency and productivity gains across New Zealand from economic, cultural, social and environmental points of view (sustainable management). Noting urban planning should be taking a 30 to 50-year outlook.

We intend to keep this submission brief. However, detailed evidence supporting this submission is available should that be required and the Branch is available to assist the Commission as their review progresses.

2. Matters supported by the Branch

We support the Commission's suggestion surrounding the use of land value capture techniques through the zoning process to assist with infrastructure provision, including both hard and soft (e.g. community facilities) infrastructure. This approach is commonly used in a number of overseas jurisdictions. We recognise that Councils have faced difficulties recovering the full costs of infrastructure from those creating the demands (section 5.5).

We also support some of the other tools suggested by the Commission to improve the process, including:

- Road pricing to address congestion and the use of other economic instruments
- The use of NPS and NES to set national policy direction
- Increasing capabilities on smaller local councils and looking at funding arrangements for local government to assist in the delivery of urban planning. As the commission is aware funding avenues are limited in the New Zealand, with only Malta having less central government support for its local government activities within OECD

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- Improving the rezoning (plan change process), however we note that caution should be adopted when considering the rezoning process as there is a risk of negative outcomes. It is important to recognise that urban planning is inherently a democratic process, which creates a number of underlying tensions.

In addition, we also consider that any further review should include consideration of the role of the courts in the decision making process.

3. Matters not supported by the Branch

We disagree with the Commissions narrow interpretation of the purpose of urban planning. The Commission appear to believe that the purpose of urban planning is limited to managing externalities, fair and efficient decision making about local public goods and infrastructure development (section 5.1). We have a number of concerns with this interpretation:

- Firstly, in our view, the draft report confuses urban planning with planning. Urban planning is a sub set of planning with a big P and we believe that this confusion fundamentally colours and undermines the whole approach to the report. This is also reflected in the commentary supporting the draft report.
- Secondly, we have concerns regarding the reports narrow focus of what the urban planning system is/does. For example page 3 of the summary states that planning is “*the most appropriate system for allocating land use through this system to support desirable social, economic, environmental and cultural outcomes*”. The urban planning system has developed and grown over the years and its focus is so much wider than “allocating land use”. Aesthetic and urban design matters are legitimate concerns to address how we grow and develop cities. The “four goals”¹ are missing reference to urban design, sustainability and environmental.

We disagree with the Commissions view of the planning systems role in the housing affordability and supply issue. While we acknowledge there is a growing housing affordability /supply issue in Auckland we are concerned that once again there is such as heavy and narrow focus on “providing sufficient urban development capacity”². The planning system /profession is not wholly responsible for this issue – other factors also contribute to housing supply (labour supply, cost of material, size of construction industry, interest rates (issues acknowledged in the Commission’s Supply of Land for Housing Report) etc.).

We disagree with the Commissions narrow interpretation of what it is to be a “Planner”. In our view, the report takes a very narrow view of what a ‘Planner’ currently is in New Zealand. It appears to be confined to working only within a defined regulatory framework “reliant on regulation through preparing physical plans with their zone based rules” (ref Page 26). This despite the assessment that NZPI has “utopian aspirations” and risks planners becoming “jacks-of-all-trades, masters of none.” (Page 6). Overall the Report struggles with the concept that planners are not ‘put into a box’ and defined like those in the medical or engineering professions (to use the examples from the McDermott Report) and somehow because of that the profession is ill-defined, has abandoned theory and planning outcomes perhaps suffer for that. For example, the political nature of policy and plan development appears to have been overlooked with planners being considered solely responsible for the outcomes of Regional, District and Unitary plan processes (among other plan and policy development processes).

¹ flexibility and responsiveness - ability to change land uses easily;
 Provision of sufficient development capacity to meet demand;
 Mobility of residents and goods to and through the city; and
 Ability to fit land-use activities within a defined biophysical envelope

² Pg 3 Summary document



We disagree that “*repeated amendment to the planning statutes have increased their complexity and reduced their coherence*”.

The conclusion of this inquiry is that the planning legislation lacks clarity and focus³ and that “*Setting clear priorities within the planning system is particularly difficult*”. As urban planners we believe this is not the role solely of legislation. There is a role for communities and their democratically elected reps to play a meaningful role in envisioning and creating communities that they want to live, work and play in. Good urban planning allows communities to make choices and trade-offs to find the right balance between new development and services as well and protecting our environment.

4. Conclusion

Overall, and as outlined above, there are a number of matters raised through the Report that the Branch are supportive of. However, the Branch is particularly concerned that the authors of the Report have adopted a particularly narrow view of the role of the Planning professional and the role and purpose of the Planning system. In our view, this narrow interpretation has led the commission to reach some inappropriate conclusions.

As noted above, the Branch has sought to keep this submission brief, but can provide detailed evidence supporting this submission if requested. Further, the Branch would welcome the opportunity to assist the Commission as their review progresses.

Auckland Branch NZPI

³ Pag 11 summary doc