



3rd October 2016

Better Urban Planning Inquiry
New Zealand Productivity Commission
The Terrace
Wellington

Submission on Better Urban Planning Report

This response is on behalf of the Environmental Planning Programme at the University of Waikato.

Overall, the document is timely as the growing pressures on delivering growth in New Zealand should lead to a period of reflection concerning the role of planning in this context.

Aspects of the report do give significant rise for concern however. As such, we appreciate the opportunity to shape and improve the final version. To help provide focus to our comments, we have structured our response around three key aspects:

- a) The scope of the report
- b) the scope of planning
- c) The way the education sector is discussed

The Scope of the Report

The terms of reference are narrowly urban and as such do not provide a solid basis for reform of a system that is much broader than this remit. While reform may well improve aspects of the system, without a comprehensive approach there is a risk that any changes may lead to perverse outcomes and prohibit many existing benefits from taking place.

The Report reflects an economically based, free market neoliberal ideology, and lacks balance with regard to social, environmental and cultural dimensions. Assumptions made and evidence selected appear to reflect this point of view, frequently lacking balanced discussion and consideration of a wide range of perspectives. The approach recommended by the Commission tips the balance in favour of private rights and development, without adequate consideration of wider impacts such as degradation of the environment which would provide a more balanced view.

The document does highlight what it sees as strengths of the existing system, such as high rates of processing resource consent applications within timeframes, low rates of notification and declining of consents, and comparatively enabling zones. However, much of the material appears to be cherry picked to support an existing argument, and criticisms of planning are not debated in a balanced way, with views from a range of perspectives, balanced evidence and thoughtful consideration of the issues. For example, a comprehensive examination of the reason for several of the “prescriptive” rules discussed is absent. The centres hierarchy discussion provides a good case in point. In Hamilton, this is actually a very welcome and successful response to a public outcry for planning to enable city centre regeneration, a problem that was caused, in part, by under-regulation. It is based on very sound evidence and is well supported by public and politicians alike. Given the wider flow on effects of office workers in CBDs, it should actually lever in much more economic gain to the city than having no policy at all. In short, while over-regulation is cited as a weakness of the system (despite planning being acknowledged as effective in managing this as seen at

the start of this paragraph), without understanding local context there is a danger the report will be counterproductive and lead to perverse outcomes.

Overall, the report tends to focus on the costs of planning over any benefits, and as such creates significant issues with regard to making a balanced assessment of reform. This is not a methodological problem that is confined to New Zealand, and is apparent in other national reviews of the value and efficiency of planning. For example, research in the UK identified two key weaknesses in some studies that are critical of planning (see Adams and Watkins, 2014¹ for an extended review), that they:

- neglect the full breadth of planning;
- fail to employ a variety of economic analyses that might reflect this breadth.

They go on to say how, these studies typically:

- focus on the ‘costs’ of development management rather than the value of planning much more broadly;
- are based on an abstract and artificial view of markets, and one that often fails to take account of industry structure in sectors such as housebuilding and the impact this can have on supply.

The structure and approach of the report in its current iteration helps support this international experience.

The Scope of Planning

The Report suggests three rationales for urban planning: regulation of negative spillovers; decisions about provision of public goods; investment and coordination of infrastructure. This seems to take a very narrow view of urban planning, with the implication being that many outcomes should be left to market forces. A more balanced approach is necessary to recognise aspects which provide necessary requirements in society, such as strategic planning/ forward planning and planning towards specific higher quality urban outcomes, such as through place-making.

The argument of the need for planning to have a ‘unique professional identity’ (page 316) is spurious and there is no solid evidence that it has to have such uniqueness to be valued as a profession. Indeed, planning operates in an inter-disciplinary space and responds to complex multi-faceted and evolving issues which vary according to location and community needs – planning should not be boxed into a “unique” and limited operational space, but should retain the flexibility to engage with broad perspectives and issues, which may have a strong spatial component. Planning works as an integrator of knowledge which brings many differing understandings together to work within the tensions that commonly exist within planning and resource management decision-making.

Similarly, the notion that there should be ‘a core body of knowledge’ that is solely ‘planning’ strikes us as a strange idea that is situated in decades old thinking. For example, it entirely misunderstands the role of theory and how theory is generated – it is meant to be dynamic and evolve, in a process of creative destruction associated with modernity. This exposes the profession to new ideas, and solutions to problems that may be developed beyond the discipline. For example, ideas emerging internationally concerning policy mobility or mutation may hold promise in better understanding how to translate national goals into practical outcomes. But will they be inside or outside this body of knowledge. If there is a core body of knowledge, who decides what it is? How often is this updated? Gatekeeping of this nature

¹ See: http://www.rtpi.org.uk/media/1024627/rtpi_research_report_value_of_planning_full_report_june_2014.pdf

harms the discipline and we believe runs counter to some of the outcomes that the report would like to generate.

By trying to say exactly what planning is the Productivity Commission doesn't understand the lessons from planning history, which is referenced within the report. A key message is that planning, as a means by which states organise and manage land and resources, will be subject to change as the socio-political context changes over time. The desirable purposes and role of planning is a frequent and ongoing strand of planning theory, which even over recent years has made cases for a variety of aims from smart cities, to justice, to resilience. Even if the Productivity Commission does pursue this notion, it should be emphasised that it will only be temporary pigeon hole. The political nature of planning makes that inevitable.

One positive example however, was how the Report highlights that utilising other policy tools, e.g. economic tools, would be of benefit. This is in line with OECD recommendations and local government currently faces restrictions in being able to utilise such tools. Providing options, resources and training to use and integrate additional tools would be of benefit (e.g. pricing, taxing, subsidies).

The Education Sector

The series of factual inaccuracies which riddle 'Chapter 12: Culture and capability' result in a loss of credibility. From the perspective of a university that teaches an accredited planning course, the discussion of education (chapter 12) was poorly researched and unbalanced. Overall, there is no evidence of a robust consideration of how planning is taught at the tertiary level in NZ, with the treatment largely cursory and uninformed.

For example, two key elements were just plain wrong. All NZ Universities place great emphasis on teaching and encouraging students to be critical thinkers, it is a core staple skill we develop from year 1 all the way to graduation – the implication that this does not happen is entirely inaccurate and lacks evidence. Similarly, the report makes an unsubstantiated assumption concerning what skills all students leave with without understanding the content of courses.

In addition to these two fundamental aspects, we have listed more inaccuracies below:

(Page 313) In some cases, the non-planning content of degrees offers little more than an introduction to other disciplines (McDermott, 2016). For example, while economics and urban economics are part of most university programmes, core papers generally only cover basic concepts. This is surprising given the important role that planning plays in allocating scarce resources and correcting market failures. The risk with this "broad" rather than "deep" approach to planning education is that planners leave university with only a cursory understanding of the disciplines on which they draw. This can lead to policy prescriptions that lack a strong theoretical or empirical evidence base. One possible exception is Massey University's programme where, in addition to compulsory planning papers, students are required to complete a "minor" in a non-planning discipline (such as ecology, economics, geography, management or Māori studies). This approach provides an opportunity for students to develop a deeper understanding of a related discipline.

Comment - This is incorrect as it relates to the Bachelor of Environmental Planning at the University of Waikato. The structure of this degree requires students to elect a stream in science (terrestrial environments, coastal and marine or fresh water), or in environmental economics, or society and the environment or public policy. To complete a compulsory planning stream, students must complete 130 points, of which at least 100 points must be above 100 level, including 60 points above 200 level. The consequence of the inclusion of the stream within the four year degree structure is that students graduate with considerably more than a cursory understanding of a subject identified as strongly complementing core planning content. The depth of knowledge in the stream area more closely

parallels the depth of a major, with this level of endeavour being made possible by the architecture of a four year degree.

(Page 313) Generally speaking, planning degrees from Lincoln University place more emphasis on the natural environment, while Waikato University offers opportunities to supplement planning courses with learning in the cultural (particularly Māori) and political science spheres. Lincoln University tends towards the physical sciences in its complementary papers.

Comment - This is incorrect. The stream options available at Waikato enable development in a choice of subject disciplines/potential vocational directions. One pathway focuses on natural science, whilst the other pathway includes economics or public policy, etc. The compulsory core of the planning degree contains papers related to mātauranga Māori, Māori lands and communities and Māori resource management/co-management identified as critical in New Zealand planning, with particular relevance to the Waikato Region.

(Page 316) It is also notable that while five universities in New Zealand offer NZPI accredited planning degrees, only a small proportion of university teaching staff trained as planners, and even fewer have practical planning experience. Miller (2016) notes that most university programmes only just meet NZPI's requirement that a proportion of teaching staff must be eligible for NZPI membership (or members of an equivalent overseas institute). Generally, the other staff will have advanced degrees in geography, social policy, environmental management or ecology

Comment - This section is at odds with the criticism about cursory knowledge in other areas. All the papers in the Bachelor of Environmental Planning degree are taught by experts in their subject area. To retain accreditation with the NZPI we must ensure that 75% of the planning core is taught by correctly certified members of the NZPI. Ours is. Not all of the planning core is taught by planning experts certified by the NZPI, for instance our experts in spatial analysis usually have science or Geography training and our experts in cultural knowledge may come from a range of disciplines, and for environmental monitoring are scientists. But to teach critical thinking in planning, planning theory, planning principles, sustainable cities, planning methods (such as cost benefit analysis, EIA and forecasting) and planning law, etc, our staff are certified by the NZPI. We have non-planning experts teaching stream subjects such as Earth Material and processes, Oceanography or Urban and Regional Economics, as they are best placed to do so.

Page (319). **Comment** - The desirable cultural attributes for planning fail to understand and recognise the principles upon which planning currently operates and are dislocated from a clear understanding of the cost and delivery of strong evidence bases.

(Page 323) The number of students enrolled in planning courses provides another insight into the education of the workforce. Figure 12.5 shows that over the period 2007 to 2014 the number of undergraduate students remained fairly constant, while the number of postgraduate students has declined

Comment- a key reason for the decline in PG students at Waikato is the introduction in 2011 of the 4 year Bachelor of Environmental Planning accredited by the NZPI which has reduced the number of students who previously moved to post-graduate study following completion of a 3 year degree (usually a Bachelor of Social Science or Science in Resources and Environmental Planning). Accordingly, statistics suggesting reduction in postgraduate students may mistakenly attribute a reduction in level of study when in fact that reduction to that extent has not occurred, rather the nature of the qualification has changed.

Part of the reasons for the misunderstandings shown here appear to stem from the very limited data collection strategy employed, where incredibly, no universities were part of the consultation exercise, and only one academic who would characterise themselves as a planner was contacted. It is inevitable that attempting to analyse and discuss the planning tertiary sector with NZ while giving very little voice to planning academics would produce a series of inaccuracies and unsupported conclusions, particularly those that subsequently attempt to dissect what is taught, how, and the outcomes that are produced.

In short, the conclusions regarding the education of planners better reflect the very limited nature of consultation, rather than the state of planning education.

Conclusion

Overall, while there is merit in discussing reform of planning, it should be done in an informed and balanced manner. That said, there is a danger in trying to make the system more efficient, you could actually make it less effective. As the report acknowledges, aspects of planning are working really well and delivering good outcomes for people and places. We all have a stake in producing a system that adds value and delivers economically, as well as socially and environmentally, but, as is highlighted throughout the report itself, decisions should be based on sound evidence to engender the best results.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Iain White'.

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