



# New Zealand Institute of Surveyors

## **SUBMISSION**

New Zealand Institute of Surveyors submission to the New Zealand Productivity Commission's Better urban planning - Draft Report

4 October 2016



## Better Urban Planning

The New Zealand Institute of Surveyors (NZIS) is pleased to be able to comment on the Productivity Commission's draft document "Better Urban Planning" (Aug 2016).

NZIS is the primary professional institute representing land surveyors. We are an incorporated society, with the different sub disciplines of land surveying represented by different professional "Streams". This submission has been prepared by the Land Development and Urban Design Stream of the NZIS.

Our submission focuses on specific Questions, Findings, and Recommendations that our members wish to comment on as NZIS does not have the resources to make a comprehensive response to all of the report.

### Chapter 2 – High Performing Cities

NZIS supports the following statement made in the Urban Design Forum's submission "The draft document ignores the role of design in urban development, whereas UDF considers that cities that have embraced the role of design in their development, such as Melbourne and Vancouver which lead the global lists of liveable cities, have benefitted economically and socially from doing so".

NZIS believes that well performing cities successfully reference their sense of cultural and natural identity and history. We also believe that the quality of the built environment and urban public space amenity are important factors in successful cities. We don't believe the Commission has given enough emphasis to these matters and support UDF's suggestion that the Commission look at the success the Hobsonville Land Company has had at Hobsonville Point at using these factors to inform and guide their project.

### Chapter 3 – A Rationale for Planning

**Finding 3.1** – *The three main and well-founded rationales for urban planning are to:*

- *regulate negative spill overs when people build structures, work and live near each other;*
- *make decisions about the provision and funding of local public goods to best meet the needs of residents; and*
- *invest in and run local and regional infrastructure to provide essential services for local residents and businesses; and to coordinate different infrastructure investments with land development.*

NZIS believes The words "and play" need to be added after "to work live" in the first bullet point, and the word "land" in front of "development" in the third bullet point makes the clause too

restrictive. Land Development in urban areas is essentially a pre-requisite for buildings so the focus needs to be on what the building development on the land will be.

## Chapter 7– Regulating the Built Environment

### Finding 7.5

*Council requirements on some developments to undergo urban design assessments are leading to poor exercises of regulatory discretion. Urban design criteria can lack clarity and precision, and design advice to resource consent applicants can lack perspective, consistency, or a sense of their cost or economic implications.*

NZIS agrees with some of the comments on urban design, but don't agree with the underlying premise of this Finding that good urban design is not a requirement. We would like to see an emergence of a planning system that encourages design led (as opposed to a strict rule based system) development solutions. There are instances of Urban Design Guidelines and Urban Design Panels working well. Maybe a better approach is to understand and replicate best practice.

## Chapter 9 – Urban Planning and Infrastructure

### Question and Recommendation 9.1.

*Spatial plans should be a standard and mandatory part of the planning hierarchy in a future system. Spatial plans should be tightly defined and focus on issues closely related to land use, in particular the provision of water and transport infrastructure and community facilities (eg, green space, reserves, conservation areas, and libraries), protection of high value ecological sites, and natural hazard management.*

Christchurch City Council in their submission question whether spatial plans would replace anything or is there currently a vacuum? NZIS ask the same question.

NZIS would support their introduction as statutory instruments that either take the place or robustly link the RMA to other existing tools.

### Findings 9.3 and 9.5.

*Institutional and governance arrangements for “three waters” infrastructure act against responsive supply.*

*Fragmented and small-scale water networks in New Zealand, the uncertain net benefits of mergers, and the high costs of setting up alternative institutions mean that the*



*Commission does not see merit in proposing large-scale structural reform for urban water services. However, there is considerable scope for improved performance in the delivery of water services.*

NZIS supports these findings, in particular that 3-water bodies (eg - Watercare, Wellington Water) act against responsive supply.

## **Chapter 12 – Culture and Capability**

NZIS does not wish to be drawn in to the implicit criticism of the planning profession in this chapter. However, we support the view that often there appears to be too much emphasis on small points of procedure as opposed to taking a wider view on whether a particular proposal has merit “on-balance”, and if so, taking facilitative and risk based approaches to dealing with development applications. Our members are often at the forefront of land development applications and feel this frustration strongly

## **Chapter 13 – A Future Planning Framework Culture and Capability**

There is no easy answer to the Questions posed in this chapter. If we were in a vacuum two separate laws with strong linkages may work better, but on balance NZIS believes it is probably better and more effective more quickly to focus on improving what we have than starting from scratch with all the uncertainty and delays that would entail.

There are many examples of the existing regime working well around the country. We should be looking at those and asking why - then replicate those learnings.

NZIS would support an EPA approach. Regional Council’s have not been very successful at improving many of the environmental indicators and a national approach is needed to achieve this, especially for water quality.

We will be pleased to meet with the Commission to expand on these points if requested.

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