



15 July 2016

Urban Environment Team
Ministry for the Environment
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Auckland

Via email: npsurbandevelopment@mfe.govt.nz.

CONFIDENTIAL

Submission to the Ministry for the Environment on the Proposed National Policy Statement on Urban Development Capacity

Submission of the Auckland branch of the New Zealand Institute of Landscape Architects Inc.

Introduction

1. The New Zealand Institute of Landscape Architects Inc. (NZILA) is the national professional organisation of landscape architects in New Zealand. The NZILA was incorporated in 1972 to promote the sustainable management of New Zealand landscapes and the role of landscape architecture in the design, planning and management of New Zealand landscapes.
2. The Statement of Philosophy of the NZILA is that:

The landscape reflects the cumulative effects of physical and cultural processes.

The New Zealand Institute of Landscape Architects aims to foster and develop an understanding of these processes and to ensure that this knowledge is applied in such a manner as to conserve or enhance the quality of all natural resources and human values.
3. The NZILA made an earlier submission at the initial consultation stage, (attached)
4. The Auckland Branch of the NZILA represents landscape architects working in consultancies and other private sector business, Auckland Council, government agencies and advisory and advocacy groups, and the education sector in the Auckland region. The NZILA and its branch members participate in Resource Management Act (RMA) and Local Government Act (LGA) processes.

5. As the NZILA branch that is resident within, and works throughout the Auckland region, we welcome the opportunity to provide comment on the Proposed National Policy Statement on Urban Development Capacity (Proposed NPS).
6. This submission has been prepared by the Auckland branch of the NZILA on behalf of its' membership. While the submission does not necessarily reflect the specific views of individual members, it may be considered representative of branch members' views as a whole.
7. We acknowledge that the Proposed NPS is focused on ensuring that statutory planning provisions will provide for and enable urban development through providing sufficient development capacity for housing and businesses, but consider that this cannot be divorced from wider planning of the built and urban environment. We are disappointed that ideas to more comprehensively address urban planning and design within the RMA have not been progressed.
8. Accordingly, we offer tentative support for the policy while reiterating points made in submissions to previous central government initiated inquiries dealing with this matter. Specifically, policy interventions that address urban planning issues need to be comprehensively considered alongside other urban development and environment objectives and strategies. We generally support the use of spatial planning for the successful development of an urban environment, but caution that spatial planning should not be limited addressing to land capacity only but needs to be an integrated process which includes all elements that make a successful, liveable city.
9. The following submission points draw on the earlier submissions from the NZILA and the Urban Design Forum.
 - a) We consider that intensification and expansion of our cities comes with a responsibility to undertake quality urban design. Among the parameters of quality urban design is the relationship of development to the existing context and environment, including the natural landscape and built landscape. The planning and design of the built environment and its open spaces are fundamental to the way our cities and towns look and feel. This, in turn, has an influence on how attractive they are to people as places to be, which eventually flows through into the creativity and talent those people bring to the places and hence to the economic performance of the urban environment.
 - b) We are also of the opinion that a more robust legislative framework for urban development is necessary to guide developers and decision makers in consistently providing quality living environments. In this way the Proposed NPS should encourage, enable and ensure more enduring and beneficial social and environmental outcomes through enhanced, clearer processes set out for assessment, design and decision making.
 - c) The Proposed NPS should have provisions that would promote context-specific development, with a focus on the provision of green infrastructure and quality multi-modal transport options (including cycling and walking), alongside the appropriate enhancement of landscape values.
 - d) Importantly, we consider that better integration and improved processes should not result in urban and infrastructure development undermining sustainable landscape management. In our view, any streamlining of policy and process to enable development should not be at the expense of the environmental quality of urban landscapes, including:
 - Compact development.
 - The development of a compelling urban image (a memorable city).
 - The enhancement of place and landscape attributes, enabling a city landscape which inspires.

- The recognition and promotion of mana whenua values of landscape, sense of place and community.
- Flexible rather than rigid street standards which prioritises walking and cycling and access to public transport.
- Functional, efficient, safe, attractive and dynamic networks for people and fauna and natural process.
- Opportunities for congregating and socializing with public spaces.
- Built fabric which reflects the culture and context, designed for long term use and adaptation.
- Innovation and provision for diversity.
- Diverse business opportunities.
- Protection and enhancement of civic spaces that are valued and have sense of place.
- Ensuring adequate sunlight and suitable shelter in public spaces.

Taking these matters into account, the Proposed NPS needs to:

Provide a clear, comprehensive and integrated framework for urban environments and development which dovetails with and enhances the provisions of the RMA and the LGA.

- a) Encompass a broad range of urban matters that significantly contribute to the quality of our urban environments and social fabric.
- b) Facilitate clear, consistent direction on the strategic planning for growth, and quality design in anticipating and responding to infrastructure and development needs.
- c) Promote delivery of compact urban developments and environments that are supported by an efficient transport network (including walking, cycling and appropriate public transport options).
- d) Maintain the natural landscape features and environments that support a high quality of life.
- e) Protect and appropriately enhance existing landscapes and to create new, desirable environments that encourage people to use and appreciate them.
- f) Ensure an integrated approach to delivering connected green infrastructure as an essential aspect of urban developments.
- g) Respond to and encourage the adoption of appropriate Māori values.
- h) Result in quality development which recognises other local cultures, and provides for the range of facilities expected so that they do not create other overload problems.
- i) Ensure that areas which have cultural, heritage or landscape significance are recognised and included in strategic planning.
- j) Complement the strategic ideas promoted by the Urban Design Protocol.
- k) Recognise the status, values and significance of outstanding natural landscapes and features, including regionally significant volcanic features.

- l) Recognise the contribution of outstanding natural landscapes and outstanding natural features to Auckland makes to Aucklands unique identity.
- m) Create clear objectives for urban growth and development that:
- Creates greater certainty and direction for new development.
 - Recognises the risks of climate change.
 - Recognises the role of green infrastructure in infrastructure/services provision.
 - Does not undermine sustainable landscape management.
 - Values landscapes and vegetation and their role in urban development

Conclusion

10. The Proposed NPS must uphold the essential protection of the natural environment in and around cities and towns, such as coastal and fresh water systems, volcanic cones, areas of bush, and air quality. These are things that New Zealanders value, and their status under the RMA and the LGA should not be diminished.
11. The Proposed NPS must not undermine the promotion of a quality, design-led urban environment, and should incentivise developments that provide attractive places for people, complemented by timely delivery of social and physical infrastructure.

The NZILA has a keen interest in this topic and would like to be contacted when further consultation is undertaken. Contact details are listed below.

For and on behalf of the membership of the NZILA Auckland branch,

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