

19 February 2023  
Committee Secretariat  
Environment Committee  
Parliament Buildings  
Wellington

## **To the Parliamentary Select Committee on the Spatial Planning Bill**

**This submission is made on behalf of the Urban Design Forum Aotearoa**

### **URBAN DESIGN FORUM**

The Urban Design Forum (UDF) is a membership organisation dedicated to promoting urban design excellence across Aotearoa New Zealand.

The UDF has a multi-disciplinary membership comprising built environment professionals including city and transport planners, architects, landscape architects, engineers, surveyors, politicians, academics, developers, architectural historians, design and planning students among others. The UDF promotes and represents a cross-disciplinary approach to understanding our urban environments.

### **INTRODUCTION**

1. The UDF welcomes this opportunity to comment on the proposed Spatial Planning Bill. We have a long history of presenting our vision of how the urban environment should be managed in Aotearoa New Zealand. This is an important moment when what we do now will have lasting impact through the coming decades.
2. The UDF welcomes the introduction of the Spatial Planning Bill that recognises the growing trend by central government and councils towards more integrated and longer-term approaches to planning at a broader scale.
3. However, we are concerned at the potential undermining of the urban quality outcomes at a neighbourhood scale within the Natural and Built Environment Bill. The UDF recommends there is a stronger focus on achieving a continuum of processes and outcomes across the spatial scales, from national through to local, not the priority of one at the expense of another.

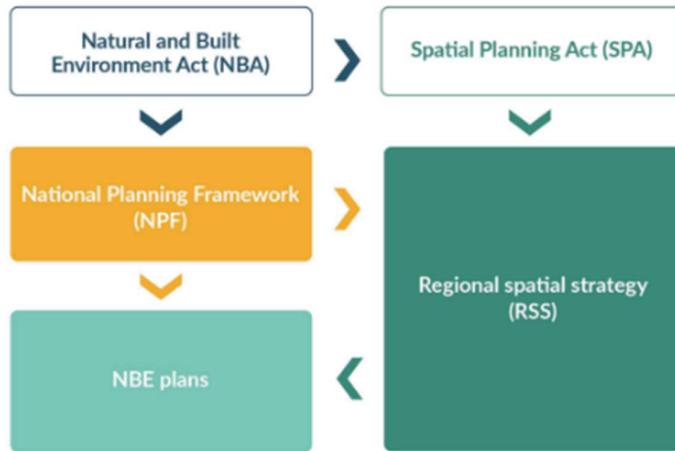
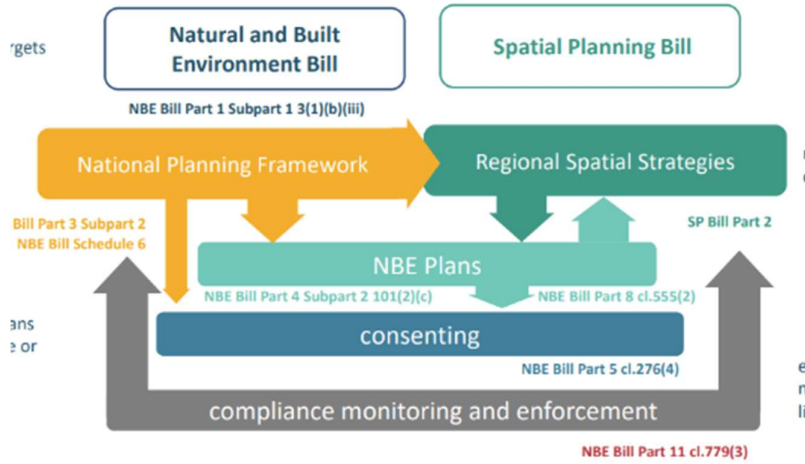
### **SUPPORT**

4. We support the setting out of key process steps for developing Regional Spatial Strategies (RSS), based on both engagement and technical inputs, and their content, based on clear scope, key matters and priority actions that need to be addressed.

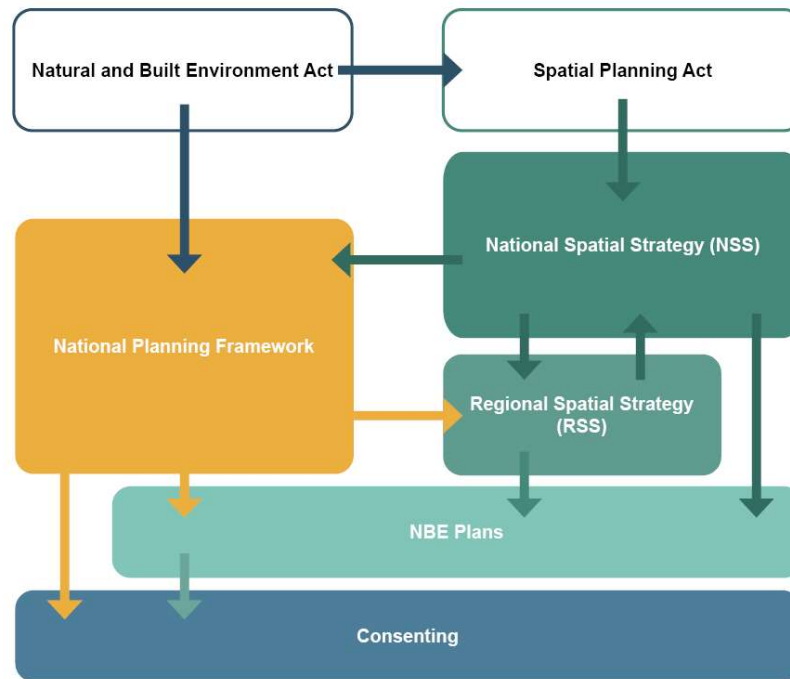
5. We support a pro-active approach to managing the strategic direction of environmental change (and protection) in a holistic and coordinated way, founded on a vision and objectives.
6. We support the integration of the National Planning Framework with relevant instruments prepared under other Acts (e.g., Biodiversity and Infrastructure Strategies, Government Policy Statements etc.) to formulate the RSS and the subsequent use of RSS' to guide Natural and Built environment plans, Council long-term plans, Regional land transport plans and other central government investment.
7. We support the expectation to have a strong visual mapping component, accompanied by strategies and rationale, that will clearly articulate urban form relationships, responses to spatial constraints and managing the urban, peri-urban and rural interfaces.

#### **RECOMMENDATIONS**

8. We recommend that a National Spatial Plan is added, which complements the National Planning Framework. This would provide national direction that the RSS' would give effect to and provide consistency between regions. This would address national and inter-regional issues, including climate change mitigation / adaptation, infrastructure (e.g. transport, energy, water, health, education, defence, tourism, etc.) and other macro-economic and environmental / social well-being considerations (e.g. biodiversity, recreation, natural hazard resilience, etc.). Its scope needs to cover both land and EEZ marine environments.
9. The population and/or size of Aotearoa New Zealand is comparable to other benchmark spatial planning initiatives internationally (e.g. Ireland, Scandinavian countries and Greater Sydney) to support a national spatial plan, for 'NZ Inc.'
10. We consider that the National Spatial Plan can be developed simultaneously as the National Planning Framework, and will initially contain a collation of existing national direction. In time this can be further developed and be used for the creation and management of a set of national databases and digital tools that will give direction to the Regional Spatial Strategies.
11. We recommend there needs to be a more clear and direct relationship between the various pieces of legislation and their hierarchy. The material currently provided illustrates conflicting diagrams. The below diagrams are from MfE (Initial briefing).  
Left is Attachment 2.1 and right is Attachment 3. It is unclear if and how NBE plans inform the RSS.



UDF suggests:



A vague direction of the RSS to the NBE Plans will not be effective. We recommend a clear direction and hierarchy to reduce the risk of re-litigation of NBE Plans.

12. We recommend for the long-term strategic integration for planning of community well-being, as this is absent in the RMA.
13. We recommend there is a clear hierarchy between the multiple outcomes that the legislation is trying to achieve, which leaves potentially significant conflicts between environment and development to be resolved as part of its implementation. This can then inform processes to address unanticipated developments. For instance, (Clause109(b) NBE bill can major economic events justify a departure from protective elements of a regional strategy (e.g., a new highway to disrupt important biodiverse corridors).
14. We recommend the preparation of model RSS to ensure consistency of inputs and deliverables across and between regions and clearer direction on the level of detail expected. This needs to include clarify the relationship between Future Development Strategies and Spatial Plans.



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## CONCLUSION

15. UDF supports resource management reform, and considers it has a valuable contribution to make in this process.
16. We wish to thank the ministry and the environmental committee for the opportunity to provide feedback, both verbally and in writing. The UDF would like to speak to the submission.