



Memo to: The Ministry for the Environment
Re: a **National Policy Statement on Urban Development.**

The Urban Design Forum supports the principle of a NPS on urban development.

While the timing of this invitation to comment has prevented a formal gathering and filtering of opinion from our membership, we would like to make these informal observations.

The primary objective of our members is to achieve good quality urban environments.

The life-span of an urban environment is long – at least 2 generations. If a poor quality urban area is established – one that has weak transport links, no facilities, low-quality public spaces and which creates a sense of isolation rather than one of community – then the long-term costs to the wider community in dealing with issues arising there will be significant. The disadvantages of living in such a place are intergenerational.

We are concerned that, in the well-intentioned efforts to increase the supply of housing, there is the potential for poor urban outcomes.

Furthermore, there is a strong push toward more dense forms of housing, which require a higher quality of design. As people choose to, or need to, live closer together, the issues of their dwelling's visual and acoustic privacy, orientation, identity, and connection with the outdoor environment become more challenging. At the same time, these issues become much harder to deal with through traditional planning rules, because the number of variables increase exponentially. One-size-fits-all planning rules designed to preserve residential amenity will certainly fail as densities increase.

We will be making representations on the overall planning system in response to the invitation from the Productivity Commission. The Forum has no particular view of the success or otherwise of the Resource Management Act in dealing with the rural environment, but we share the view of many industry bodies that it fails to deal well with the urban environment. While in rural areas, decisions typically involve the allocation of finite resources (agricultural land, fresh water, clean air etc), the situation in the urban environment should be more to do with the quality of development. The RMA starting point of preserving the existing environment and/or minimising effects and/or mitigating change makes little or no sense when considering urban development, and has a stifling effect on innovation.

Therefore, a NPS on urban development that leaves the RMA core principles unaltered may be ineffectual, but nonetheless it's worthy of further discussion.

The actual standards in an NPS (ie the set of instructions the Government issues to Councils and under which they consider Resource Consent applications) are not immediately obvious. In some aspects of the built environment there are clear possibilities. Some of our landscape architect members, for instance, have suggested introducing quality standards on urban blue/green networks, where parks, streets, waterways and storm-water systems are subject to integrated design. As a simple example, a storm-water swale along the edge of an open space would be judged a higher quality solution than an underground pipe serving the same purpose.

There may also be some relatively easily defined aspects to open space design – streets, parks etc – and the 2005 Urban Design Protocol may assist in developing



some objective criteria for judging quality in this area. We do not agree with the Productivity Commission's comment that this document is of poor quality, but, after 10 years, it clearly needs revisiting.

When considering building design, it becomes harder to define quality. It certainly is not about style, or the perceived quality of one building material over another. It is about dealing with the raft of issues mentioned above – space, sun and light, privacy, overlooking, identity, connection to the wider environment – in an effective, appropriate and innovative way.

The Urban Design Forum considers that, in urban areas, a more discretionary planning system is required that positively incentivises development, and where outcomes are controlled less with planning rules and more with design review. The role of design review (sometimes referred to as peer review) is well established in engineering, and, in urban design, it has established a strong track-record with review panels in Auckland, Queenstown and other cities. It has played a key role in the widely acknowledged success of Hobsonville Point in Auckland.

We note that the 2008 study "Building Sustainable Urban Communities" suggested just such an approach (albeit ring-fenced in discrete development zones), and that that idea was partly adopted by the current government in its Special Housing Areas legislation (or at least as it was administered by Auckland Council).

The Urban Design Forum thanks the Ministry for this opportunity to comment, and would welcome the opportunity to discuss further the ways in which the quality of the urban environments we are about to create will be enduring and successful in fostering community well-being.

Graeme Scott
Chairman.

Tel 029 285 3449
Graeme.Scott@ascarchitects.co.nz

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The Urban Design Forum NZ promotes good urban design in New Zealand. UDF partners are the Planning, Landscape, Architecture, Engineering and Surveying Institutes. UDF is modelled on similar groups in Australia and England.

The purpose of UDF is to:

- promote cross-disciplinary understanding of urban design amongst urban professionals;
- raise awareness of the benefits of urban design at both national and local levels;
- provide a forum for discussion of design-based approaches that are relevant to the development and management of New Zealand towns and cities.

Membership is open to anyone interested in urban design and includes planners, architects, landscape architects, engineers, surveyors and other professionals, together with politicians, academics, developers and individuals.

The organisation is overseen by an elected National Committee who provide their service on a voluntary basis.