



URBAN DESIGN FORUM  
A o t e a r o a

## URBAN DESIGN FORUM INC

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Manatū Mō Te Taiao

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### **Re: Draft National Medium Density Design Guide Written Submission**

This submission is made on behalf of the Urban Design Forum (UDF) Aotearoa of NZ.

The UDF thanks the Ministry for the Environment (MfE) for the opportunity to provide feedback on the draft national guide for medium density housing. UDF supports the intent of the guide to encourage high quality housing using the new medium density residential standards (MDRS).

### **Urban Design Forum**

The 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, designers, 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.

The UDF recognises that creating great quality urban places also depends on a range of other aspects including politics and law-making including financial policies; development economics; social, community and cultural issues; policing; and traffic management to name but a few. Cities are complex organisms, and urban design seeks a coordinated approach to the arrangement of the physical components of urban form. These constitute the setting for the urban life, the choice of an overwhelming majority of people in the 21st century.

### **Introduction**

The UDF welcomes the opportunities to provide feedback on the draft national guide for medium density housing. We have been thoroughly engaged in all aspects of resource management reform, including providing our submission on the RM (Enabling Housing Supply and Other Matters) Amendment Bill which led to the enactment of the MDRS and requirement for tier 1 cities to change their plans accordingly.

We strongly support the development of guidance to assist property owners and small-scale developers when applying the MDRS to produce the best possible outcomes for the built

environment of our towns and cities. UDF also supports integration of te ao Māori concepts within the guide. However, while there are great principles within the guide, the UDF is concerned that the current document is too high level and needs to be more clearly pitched to its target audience, providing an array of scenarios that are clearly illustrated and easy to follow.

## Key issues

With this in mind we make the following key points:

1. While the guide has an appealing format, the scope of the guide would benefit from being better defined. The purpose of the guide is to demonstrate what is permitted under the MDRS, which quite likely will not be seen by Council officers, and therefore it is crucial that the standards are plainly articulated and illustrated.
2. The guide needs to be focused on its target audience. If this is intended for property owners and small-scale developers, as outlined in the webinar, then perhaps it should be written from the perspective of how to improve the value of the development. This could include consideration of what prospective inhabitants (be they purchasers or tenants) may want.
3. While the advice provided in the guide is at the site level, advice on site selection is noticeably absent. In order to complement the MDRS, greater consideration should be given to the layout, dimensions and qualities of a site, which may lead to conclusion that the site is not suitable for application of the MDRS due to its impacts on neighbours and the street network. In terms of qualities, the guidance touches on location, but it needs to more clearly articulate the potential effects of sites that are located adjacent to noisy roads/rail or industrial and commercial land. Equally it should promote the benefits of intensifying sites close to centres or other facilities. The guide should also note the limitations of the examples used, i.e. it appears to focus on sites with street frontage that have narrow and deep dimensions. However, there are other scenarios where the standards apply e.g. rear sections with no direct street access that ideally would also benefit from guidance.
4. One of the key challenges of small-scale medium density housing is the relationship of multiple buildings/dwellings with each other on the same, often dimensionally restricted, site. Specific guidance for this level between 'the site' and 'the house' is missing in the guide. We note 'the house' chapter is written as if there will be single household units on these medium density sites. This represents only one possibility and does not match the illustrations where two buildings, containing three units are shown. Entrances, pedestrian and vehicle access ways, as well as possible communal spaces and service areas, all require consideration in relation to other dwellings on the same site as well as neighbouring sites.
5. The guide states its focus as being on three-unit developments, up to three storeys in height, however it needs to be acknowledged there is potential for four storeys within the permitted height limit of 12m. Four storeys may be particularly achievable on sloping sites, due to the HIRB standard.
6. The UDF considers the guide would be significantly improved by more specific advice or key metrics to inform the design principles and diagrams that clearly illustrate what is achievable under the MDRS for a range of site scenarios, for example the example designs within the Auckland Design Manual  
<https://www.aucklanddesignmanual.co.nz/resources/example-designs>

7. Further to the above point, in particular, the guide will benefit from identifying and providing clear guidance on key servicing and access considerations as “functions best resolved early in the design”. These include sufficiently dimensioned and safe access ways to any rear units, convenient waste storage (including access to kerbside collection), convenient bike access & storage and clothes lines. These functions are typically challenging to resolve once buildings are constructed, yet fundamental to a well-functioning residential life. This is particularly so as we face climate change and need to increase resource recovery (waste) and transport choices.
8. The UDF strongly recommends that guidance is backed up by research and evaluation to monitor the application of the MDRS and allow for reviews and revisions in the coming years.
9. There is reference to guidance at the street, neighbourhood and town/city level. If there is an intention to produce this guidance, it would be helpful to outline when that might be available.

We wish to reiterate that the UDF supports intensification of our urban areas. The UDF also supports the intention to produce guidance to ensure that application of the MDRS contributes to well-functioning urban environments. However, the UDF considers further work is required to make the guide fit for purpose, particularly because the MDRS will apply to a great range of residential sites and contexts across the country and the stated audience for the guide is property owners and small-scale developers, some of whom will not have prior development experience.

Ngā mihi nui

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