

15 September, 2008

National Policy Statement on Urban Design

Thank you for your letter of 27 August 2008 addressed to Richard Harris inviting the Institute to comment on the scope of the proposed National Policy Statement.

We are keen to have further involvement in this process and would be happy to provide expertise to further the aims of the debate.

Accordingly, we submit the following: Comments on a National Policy statement on Urban Design

Notes to Commentary

Response to questions 1 to 5 (where comment is made on "previously expressed views" these are restated for clarity and comments made in italics.

Q1. Should an NPS on Urban Design be developed? If so what issues of national significance do you consider it should address and what relative priority would you assign them?

Yes.

The essence of urban design is how people and buildings inhabit a place. The important issue is context, and how buildings respect the environment and relate to people in both public and private realms.

All areas of the New Zealand built environment should be the result of an inquisitional process. They should demonstrate how they contribute to the public realm while responding to individual needs.

Comments on previously expressed views.

Urban Design protocol definitions are somewhat flawed.

We agree that:

Some of the principles in the Protocol could help from the basis of an NPS on Urban Design.

We agree that:

An NPS on Urban Design should be linked to sustainability, including, livable neighbourhoods, towns and cities but sustainability should be a broad aim not a regulatory requirement, unless specific issues are identified.

We do not agree with:

National Strategic priorities that only address climate change adaptation, vehicle emissions and sustainable transport in isolation. Of overarching concern is the issue of private vehicle independence.

We agree with:

Positive attributes: These include regional infrastructure, urban form and structure, linking land use and transport, walkable urban environments, recognising heritage values, regeneration, subdivision layout, character, mixed use, and location of schools and other public facilities.

We agree with:

Perceived threats: These include per-urban development, large format retail, gated subdivisions, lack of interconnection, very low density development, and the impact of urban form on the landscape.

However, while these are all relevant, all have a place and can be satisfactorily designed if simple urban design principles are applied – context/context/context.

We agree with:

Growth Management: Various views on whether growth management issues (intensification, urban form, location of new housing development) could be covered were recorded. However, some maintained that an NPS on Urban Design would not be possible without addressing urban boundaries, infrastructure design, and the location and design of new settlements.

However we agree that: while an NPS can have broad framework for guidance to local authorities it also needs simple principles, which can be easily applied – now.

Q2. If an NPS on Urban Design were to be prepared, how would you see it being structured, what level f detail would it contain and how directive would it be?

Some overarching guidelines should be applied. Simply stated, these are:

- A structured series of identified issues and principles from regional to the local, which could give guidance and impetus to local authorities to act.
- A series of guidelines for project analysis, for use by local authorities in reviewing projects but also acting as a proactive process for designers.

We agree that it would be useful to:

Provide a common vision and agenda with sufficient detail to give consistency across council plans as well as guidance for large scale plans and projects.

However, we think that this agenda should contain high level principles, objectives and policies, rather than prescribe either detail or local level urban design outcomes.

Q3. What should not be covered by an NPS on Urban Design?

The NPS on Urban Design should be an overall guiding framework within which the designers of new buildings can use their own creative and innovative ideas, to produce buildings which enhance our urban environment.

If it becomes too detailed and specific, then it risks being a prescriptive and stifling regime.

Additional considerations should include the establishment of processes to ensure that there is design input and review in policy decisions, for example:

- Urban Design panels in all local authorities.
- Urban Design awareness. A framework and checklists should be available for reference nationally but adopted for local conditions.

If the policy advocates quality urban design, then this would assist the ability of the Resource Management Act to embrace urban design considerations.

Q4. At what scale or scales would it be appropriate for an NPS on Urban Design to provide direction?

The NPS should provide Urban Design principles to a series of scales:

- national
- regional
- urban
- suburban
- precinct
- neighbourhood
- individual

Principles of urban design can be useful in addressing the perceived issue of erosion of old neighbourhoods, yet retaining the right of individuals to achieve potential of their own property.

It is important that rural, coastal and infrastructural elements are incorporated. Urban design is not simply about towns and cities; it should address all manmade structure in the landscape.

It is also important to address the need for growth and change while considering the existing fabric in creating new buildings and spaces.

Q5. What additional qualities do you consider should be reflected in an NPS on Urban Design?

The idea of an NPS on urban design should be inspirational and visionary, yet have sufficiently accessible principles and policies to provide clarity and immediacy of outcomes.

Urban Design principles should be embraced across a range of issues within a TA: – planning, environment, traffic engineering, health and safety. No single issue should be allowed to frustrate overall good urban design outcomes.

The recent change in government legislation in regard to Transit NZ working to address urban design issues in roading has been very beneficial.