

UDF SUBMISSION ON THE DRAFT AUCKLAND PLAN
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The Auckland Plan
Auckland Council
By email

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The Forum wishes to be heard in support of its submission

Introduction

The Urban Design Forum (UDF) applauds the main thrust of the Auckland Plan, and particularly the ongoing commitment to compact, efficient and well-designed patterns of growth and development.

The Auckland Council has done well to integrate the multitude of complex issues influencing the future of our city into one document, in the short time since its inception.

We support the integration of economic and social issues into the Auckland Plan. But the danger of this holistic approach is that the Plan loses focus on the spatial and physical aspects of planning and fails to address core issues that held back the implementation of previous growth strategies (regional and local).

In our opinion there are three important high level issues to tackle:

- Implementation tools
- Interaction of urban design and urban planning
- Integration of landscapes, land use and transport.

Implementation

As a group, our members are largely practicing professionals in the planning/property sector, and our focus naturally turns to the content of the document and to how the goals of the Plan will be achieved. For instance:

- A significant gap exists between the text (largely statements of need/challenges and declarations of intent) and physical intervention proposals (specifically maps D1, D2, 4.1 and 8.3). Lack of references to background studies and the Plan-specific work streams leave us unable to verify the reasonableness of many of the proposals.
- Critical to the strategy's implementation will be the extent of public investment in areas of significant change, but the extent of funding needed and available is unclear to us.
- In a number of places in the draft document claims are made that are barely delivered on, for example para 179, which states that "policies in Chapter 8 encourage employment and residential growth in the various centres at locally appropriate scales and densities".

- Key maps are difficult to read. Each map needs to be enlarged for the urban core (map D2 is the only such enlargement.) As a result it is difficult to compare key employment areas and economic corridors (map 4.1) with the development areas shown in map D2 for example.
- Section D refers to “policies” contained in subsequent chapters (specifically chapters 4,8,11) but these chapters are structured in terms of “priorities” and “directives”. No specific policies are identified.

There is a large gap between the unresolved implementation measures proposed and the detailed, site-specific measures we expect to see in the forthcoming Unitary Plan.

Interaction of urban design and urban planning

It is heartening to see the importance that is placed on urban design in terms of implementation of the Plan. But a workable, feasible compact city will not emerge just from the application of urban design. Good urban design is an important ingredient, but urban design cannot make up for poor planning, whether this is from lack of co-ordination between land uses and infrastructure or selecting the wrong areas for growth and redevelopment. It is the latter situation which is of particular concern. If opportunities for more intensive working and living arrangements are identified in areas where there is not the market support for such development (or there is insufficient public support to make these areas attractive to development), then no amount of urban design will overcome the resulting problems of limited take up and poor quality outcomes as development economics get distorted to fit with a desired “top down” zoning pattern.

The Auckland Plan must acknowledge that growing the market for intensive housing from around 1 in 3 new dwellings currently to 2 in every 3 new dwellings is a major challenge and one that has to be built upon understanding the drivers of people’s housing decisions and providing opportunities that match these drivers. Urban design can help to ensure that these development pressures get “played out” in a way that supports quality environments, but it cannot by itself, generate demand for compact living options.

The same comment applies to retail and business development. Good planning is needed to provide for the right framework for town centres to thrive, including the control of out-of-centre retail and business activity. Within such a framework, urban design can help to deliver better town centre environments, but in the absence of such a planning framework, urban design cannot solve all problems.

Integration of the natural and built environment

In terms of people’s living options and demand for compact living, a major gap we see is the lack of integration of the natural and the built environment. A sustainable Auckland needs to value its landscape and use it as an integrating concept – with a landscape framework based on landscape types and management areas at a range of scales. (Refer to submissions and presentation by NZILA Auckland Branch for more detail).

Landscape and open space needs to be conceptualised and incorporated into the plan as “green infrastructure” providing multi-functional place making and eco-system services. (Refer to Built Environment Work stream Response). (Refer also to UK White Paper on Natural Environment). There is opportunity for a wide range of simultaneous ‘services’ to be provided, along with amenity and biodiversity gains. This would include spaces for urban forest and sustainable rural native forest; the role of trees is largely overlooked in the Plan. While open space is included in the “infrastructure” chapter, it appears the team looking at infrastructure is focused wholly on “grey” infrastructure. Open space needs to also be recognized for its potential role as an integrator and driver for growth and development.

The potential of the blue and green edges and networks within the urban area to be extended and restored through the process of urban redevelopment is not explored in any great depth. At the same time, these blue and green edges provide one of the most important means by which the market for compact living could be extended and enhanced. There is a double benefit here that the Plan could realise, and one that is uniquely “Auckland”.

Put another way, the 1999 Regional Growth Strategy emphasised land use and transport integration as the way to grow the market for intensive housing options, with most new housing to be located in areas where it could support reduced vehicle use and increased passenger transport use, walking and cycling (for example around town centres and along transport corridors). Experience indicates that this strategy was only partially successful. A lack of appropriate zoning in the areas identified for growth in the 1999 strategy was a contributing factor, but is not the main reason for limited uptake. While the transport system is an important shaper of people's and businesses decision making about locations, it is far from the only one. Far more important to market demand for compact living is the overall amenity and quality of neighbourhoods and suburbs and their proximity to high quality natural areas and resources. The Auckland Plan has to recognise this if it is to succeed in its desire to accommodate 75% of future growth within the urban area. What is needed is a three way integration between landscape, land use and transport.

The following sections discuss specific chapters of the draft Plan. Where relevant, the paragraph number is listed.

Section D – Auckland's High-level Development Strategy

In general, Section D fails to provide a necessary level of explanation for the selection of "development areas" (para 170 and Map D2), in relation to their intensification capacity and potential.

Para 171 explains that the development areas extend into the suburban areas adjacent to the town centres and corridors, and a reader of the Plan could therefore assume that intensification will not happen (to any appreciable extent) in the white shaded areas. If all areas are to intensify to one extent or another, then the draft Plan is an indiscriminating document and Map D2 is entirely misleading.

163_ We support the Two Big Initiatives, and in particular the drive to make the city centre a globally attractive destination.

176_ If metropolitan centres are selected on the basis of size, capacity for growth, and the range of functions they can/will perform, it is difficult to understand why Sylvia Park (a shopping mall and office park) is included while Henderson is excluded. In table 8.3, metropolitan centres are indicated as needing high quality spaces. There are no public spaces in Sylvia Park (other than surrounding suburban streets).

184_ indicates that "the Development Strategy articulates locations for future business growth and the infrastructure required to support business development". However, this articulation appears limited to minimal reference to employment in some of the 13 development areas summarised in the key to map D2 (p39). The major business areas on Map D2 are mainly in the south, which implies an inefficient distribution of commuting trips. Actual, planned, and potential business areas in the north and west need to be identified more extensively.

Existing and future land for specifically industrial uses remains unmentioned in both Section D and Chapter 4. Opportunities to relocate some existing industrial activities (for example those adjacent to the upper Manukau Harbour) thereby freeing the land for other uses, appears to have been overlooked.

188_ In general we support the eight priority areas selected for growth over the first 3 years of the draft Auckland Plan. The puzzling one amongst them is Warkworth – it is surprising that Warkworth has been identified ahead of the investment in highway infrastructure or public transport to support it. If a satellite is needed in the north, then Orewa is a much stronger candidate on the basis of road and public transport infrastructure, population, diversity and community facilities. A major study of the Dairy Flat/Silverdale/Orewa area is required. For similar reasons, Huapai/Kumeu would appear to be a better early candidate than Warkworth for satellite development.

190_ The suite of tools to bring about the desired change does not mention key barriers like the predictability of consenting processes and costs, development contributions, carparking requirements, or the risks to centre viability from nearby out-of-centre retailing.

The key barriers mentioned above apply across most Auckland centres, and we should aim to remove them more generally through the area and unitary planning processes. While we agree with putting a special focus on prioritised centres, quality intensification should be possible in most centres, because the evidence is that people seeking to live in apartments - whether students, young couples, empty nesters or retirees - often wish to continue living in their own community.

To achieve the aims of the Plan, developments that intensify urban activity need to become normal and widespread in the same way as stand-alone house building is currently practiced by a wide variety of people in all places. While Council may be able to initiate a few admirable demonstration projects, the fundamental barriers to intensive developments must be addressed in order to sustain a real change.

206_ The importance of the Ports of Auckland is noted, but we view with considerable concern the plan on page 177 of the City Centre Masterplan showing a very significant expansion of the port reclamation toward Devonport.

214_ We note that the Southern Initiative Area has expanded enormously from the Discussion Document and is now much more of an inter-governmental social initiative than a physical development initiative based on the airport as the international gateway. Given its mostly non-spatial objectives, might it be better to have this initiative as a separate document, as has been done for the City Centre Masterplan?

223_ There is confusion over the development areas marked on Map D2. Are these the areas where most housing growth is to be concentrated, in addition to town centres and corridors? Is growth and redevelopment also expected in the "white" areas? The strategy seems to have got confused as to how the urban area is to accommodate 75% of future growth.

To an extent, all areas of the city are likely to (and should be allowed to) change over the next 30 years as people's housing preferences change and the costs and benefits of different forms of living vary. The nature of ongoing change within an urban system needs to be more fully explained, and the costs of not allowing for this change to occur set out to counter a natural reaction for communities to protect their "patch".

If the goal is to accommodate 75% of new growth within the RUB, then this natural process of urban change will need to be accelerated and made attractive to wider range of households. This will need to involve both working with the development community, as well as using the public sector to help lead development in areas where the market will see redevelopment as being less feasible. This public sector lead development can involve removal of regulatory barriers, as well as investment in amenity. Should the plan focus more on the "drivers" needed to accelerate redevelopment? This is where there is a massive gain to be made to the quality of the built and natural environment of the city if the twin drivers of improving the blue and green networks in the city and a natural desire for people to live close to open spaces and areas can be brought together.

New development and redevelopment within the current urban area needs to fit the context of the area – this is the central role that urban design has to play. As we discuss below in tools, there is a need to significantly step up performance in this area. This suggests a major overhaul of current district plans and the way that they manage growth and development.

Chapter 6 – Auckland's Response to Climate Change

447_ Given the predominance of private car commuting in Auckland one of the major strategies for reducing greenhouse gas emissions (Box 6.2) should be achieving a spatial distribution of employment, recreation and residential areas that minimises the distance and inefficiencies of private car commuting. This is particularly important in relation to Auckland's geography with its expensive and vulnerable squeeze points connecting the isthmus to the outer sectors.

688_ The goal of emissions reductions is hard to reconcile with some project priorities, for instance the Puhoi to Wellsford motorway (first decade) being given higher priority than the Botany-Flat Bush-Manukau busway (second decade). Eastern areas of urban Auckland are developed around car

transport more than most other parts of the city, and some serious public transport infrastructure to service these is long overdue.

Chapter 8 - Urban Auckland

485 to 487_ As well as supporting the commitment to higher quality design, the Urban Design Forum supports the continued commitment to intensification and a compact city offering residents more choice of housing type.

491_ We are not convinced that the suite of tools listed will be sufficient to achieve either the design quality or the market drive to intensify outside the central area. They will be insufficient to “support and encourage city intensification”, since they are mostly tactical, not strategic.

492_ The UDF supports the compact city and the concept of a Rural Urban Boundary. We believe that the most effective way of holding such a line is to develop a vision with the community for the value and role of the adjacent rural land, in other words to focus on strong supportable rural zonings to help justify the position of the RUB.

512_ We would also like to see some recognition of the market impact of out-of-centre retailing and office buildings. Many of the so-called business zones in existing District Plans are too open to allowing retail and office buildings in what used to be defined as industrial areas. The result is uncertainty in the development market about the viability of identified centres and an understandable reluctance to invest. This is evident not only in centres like Panmure that have gone backwards, but in new major centres like Albany, where public investment has not been matched by the private sector because of options in nearby “business” zones. Out-of-centre retailing also poses a threat to the future viability of apparently very healthy successful centres like Mairangi Bay and Pukekohe

515_ The nine key corridors for intensification (as identified in Map 8.1 and Schedule 2 at the end of chapter (which is in fact table 8.4) are restricted to roads (no rail corridors) and several appear to be arbitrarily terminated. The potential for growth along Great South Rd beyond Ellerslie and Great North Rd beyond Surrey Crescent appears to have been overlooked (possibly on the assumption that land currently used for light industry needs to remain in this use). There appears to be more than nine intensification corridors indicated on Map 8.2

519_ The UDF supports the importance of design-led development as described in Priority 3. Good urban design is essential to successful intensification and to encourage more people to live in mixed-use town centres where they can carry out much of their daily business.

520_ The predictability of consent processes and costs (notification, development contributions) is a major issue for developers of intensive housing. It is one reason that many developers do not even attempt intensive housing and continue to assert that the market wants large detached houses, when that is clearly growing market for more compact living opportunities.

527_ The key words here are “integrate development proposals with transport”. This is worthy of “priority” status and with its own set of directives. The importance of transport's influence on urban form is perhaps implicit in the document, but it needs more explanation and follow-through into policy.

529_ More flexible parking standards are mentioned, but we would like to see a clearer recognition of the impact that on-site carparking requirements have on costs, good design and the achievement of intensification.

For example, the vibrancy of the urban pocket behind Victoria Park Market is widely attributed to the absence of parking requirements here. By contrast, other areas with a similar built form (largely developed before the car) but lying outside the Central Area are failing to develop because of the required car-parking.

531_ The UDF supports the visionary nature of the City Centre Masterplan and the big moves proposed in it. There is concern around how soon some of the moves could be achieved in terms of

funding and the adaptability of the traffic network, so we urge the need for simple, low-cost incremental improvements to build momentum towards an ever-improving city centre.

545_ While there are many things to be improved, the City Centre needs to be acknowledged as a Growth Strategy success story, with 20,000 more residents and the transformation of street life that has occurred over the last two decades. The Wynyard Quarter is the most recent example to generate public enthusiasm for good urban design.

Maps 8.2 and 8.3_ It is difficult to comment on these without having a more detailed explanation of what these centre classifications mean, what is their purpose, and what actions might result from them?

What is the intended role of Metropolitan centres? How do centres as different as Newmarket, Sylvia Park and Papakura fit into this role? How were the numbers of metropolitan centres arrived at? To what extent do they represent potential rather than actual roles? What would actually be done in these centres compared to town centres or the city centre?

Similarly, how were the "Regeneration" centres distinguished from "Market Attractive" ones? And why are so many centres "Not Classified"? What would the classification mean exactly in terms of the Council's actions?

555_ Schedule 1 (p131) defines the centres hierarchy in more detail. The definition of metropolitan centres and the key attributes listed in Table 8.3 stress a diversity of activities and community facilities that places like Sylvia Park and Westgate do not yet have. It is surprising that such potential future centres are given precedence over existing more diverse centres like Henderson or Botany. The confusion between potential intensification and the existing roles of strong centres does not bode well for the development of effective targeted implementation tools.

More specific work needs to be done on the attributes of the centres (whether classified by hierarchy or required interventions) and what the implications of those attributes might be for transformation projects, area spatial plans and above all the Unitary Plan.

Chapter 9 - Auckland's Housing

579_ In considering the affordability of housing, Council needs to considerably expand housing opportunities in areas where there is now limited capacity for new development. In the main, the inner and middle ring suburbs of the Auckland urban area have experienced the steepest rise in house prices over the past 10 years, yet these suburbs have limited ability to expand supply under current planning controls. Careful planning will be needed in these areas to help increase housing opportunities in a way that maintains valued community resources. In some cases, redevelopment may need to be targeted to small geographic areas, but be of significant scale (in terms of height) to help provide the necessary scale of supply needed. In some cases, a more natural process of site-by-site infill and redevelopment is likely to be appropriate. In yet other cases, what will be needed is more flexibility over minor household units, duplexes and dual occupancy (two joined units on the same site and conversion of a home into two flats).

590_ We agree that location is an important part of the affordability debate. There are real negatives in building cheaper houses in locations that have the potential to increase the individual household's transport costs by more than their savings on accommodation costs.

Chapter 11 – Auckland's Transport

We support the principles outlined in the strategy for Auckland's transport, and the need for it to be integrated with and serving urban form. Transport infrastructure requires enormous sums of money, but this is totally overshadowed by the value of urban property that it serves.

681_ We agree with the emphasis put on the city rail link. The rail system will always be inefficient and vulnerable while it effectively ends in a cul-de-sac. The three new stations will have a rejuvenating affect on the western and southern parts of the city centre.

682_ Although it is far away into the future, the proposal for the third harbour crossing raises some obvious questions. How is the proposal for a motorway under the harbour consistent with other goals in the Plan? And why is an additional motorway link being proposed when traffic volumes across the harbour bridge are static and even declining? Has a bus or train only tunnel been considered, which would free the harbour bridge for freight traffic?

688_ There is insufficient emphasis on the bus network as the primary mover of the majority of public transport users, both now and into the future. As the rail network is improved, the bus network needs a complete redesign to become a time-coordinated feeder system to rail and ferry. An outcome of this should be a legible bus network that facilitates easy and free transfers between routes, allowing a frequent service to a wide variety of destinations, not just the centre. This would replace the long, destination-based routes we have at present, many of which compete with rail routes, and which make cross-town travel exceptionally difficult.

694_ Given that there was virtually no capital investment in public transport for more than half a century, it is disappointing that the planned investment in roading projects still far outweighs public transport investment. The plans for new roads, particularly those leading out of the urban area (such as Puhoi to Wellsford) seriously undermine the Plan's principle objective of compact urban form. They amount to a subsidy for suburban expansion, when what is required is a subsidy for better urban housing.

696_ In considering funding mechanisms, it needs to be remembered that private car transport is heavily subsidised by the use of rates to fund congestion and safety improvements, free public parking, and by the requirements to provide parking on private land.

A variation of congestion charging that might be considered is free-flow charging, by which motorway users would be charged variably to guarantee free flow, and would not pay outside commuter hours or if they suffered congestion.

Chapter 12 - Implementation Framework

At a high level, the draft plan places urban design in a central role in the future of urban Auckland. This recognition of the importance of urban design is a step forward from previous strategies.

However, to help support quality urban environments, Chapter 12 largely repeats material that was set out in the 1999 Regional Growth Strategy - aligning the work of the council, seeking agreement with central Government, finding new sources of funding and undertaking area-based planning. Few of these tools have come into play in any meaningful way over the past 10 years, yet there is a reliance on the same set of tools. If there are no new tools or rules, are we to be stuck in the same loop?

Demanding good design in all development, supported by urban design principles and a proposed "Auckland Design Compendium" is a good start, but by themselves these measures will be insufficient. The design quality of individual development projects will also be dependent on development plans and controls at a number of scales, from large site planning to local area plans. Such intermediate level design-led planning is largely unmentioned in the draft Plan, yet international experience suggests that it is of critical importance (eg: Vancouver's Outline Development Plans.)

There is great reliance on the RUB (rural urban boundary) to implement the compact city. However experience to date indicates that urban redevelopment and associated compact living options need to be "demand" led, they can't be forced upon people and households - if they are, they are seen as a poor second choice. That is, the strategy needs to support and enable the natural market for intensification and urban redevelopment to emerge if the strategy is to be successful in achieving the scale of change foreseen.

The strategy is light on the tools needed for the centre/suburb/neighbourhood level planning exercises required to facilitate the scale of change required implied by the 75/25% urban rural split and how a natural (and understandable but ultimately very costly to society) NIMBY response is to be managed and accommodated.

There is no time between now and the Unitary Plan being finalised for this neighbourhood level planning to occur, yet the Unitary Plan will become the battle ground upon which some certainty over the future of neighbourhoods and centres will be determined. Experience indicates that the Unitary Plan will have a life of 20 years at least (including up to 5 years preparation and finalisation through the Environment Court process, 10 years of operation and a further 5 years "limping on" before the first review comes into effect). In other words the Unitary Plan needs to set out the framework for the next 20 years of growth, yet there is no way that this framework can be set in the time available, based on the contents of the Auckland Plan.

To accommodate this, the Auckland Plan could propose an incremental suburb-by-suburb approach to master planning, plan changes and redevelopment assistance spread over the next 10 to 15 years, but this is likely to fall foul of the problem that the former councils encountered in the implementation of the Regional Growth Strategy - as time progresses from when the strategy was prepared, commitment wanes and uncertainties increase. To deal with this problem, the Auckland Plan should provide stronger guidance on general urban form principles and sub regional priorities that can be taken into account in the preparation of the Unitary Plan.

At the other end of the scale, a major focus has to be on skills for council reporting planners and Hearing Commissioners - these are two important "gatekeepers" in the development control / RMA process. Resource consent processes need to incorporate sufficient discretion to appropriately exercise urban design changes. This will require a major overhaul of the district (unitary) plan. This plan cannot be a simplified statement of outcomes and principles.

Perhaps the most important breakthrough would be to recognise the impediments to the quality intensification buried in our current plans (unpredictable consenting processes, unpredictable development contributions, maximum height and density standards and then ensure that the Unitary Plan addresses these issues effectively across all of the urban area.

Actions Table

Table 12.5 lists 8 actions under the priority "Demand good design in all development". We comment on the first 5 of these actions:

1. Through the Unitary Plan develop supporting policy for new development to achieve quality development in areas identified for growth. The focus should be on achieving quality outcomes for the built environment.

This action point should refer to the built environment being recognised as an important physical resource (in terms of the language of the RMA) that needs careful management from the perspective of cumulative effects - many small changes adding up to something that is either better or worse, in all areas of the city - not just those identified for growth. (History suggests that most growth occurs outside identified growth areas). The Unitary Plan also needs to establish that the built environment should be improved in many places and areas, particularly the public / private interface, so it's not just about maintaining what we have got, it is also about restoration. It also needs to refer to enabling changes to the urban environment, so again its not just about protecting existing character, but seeing change occur and new character emerge. Is it just "policy"? What about standards and assessment criteria? There needs to be more use of site and area specific master plans to help translate broader policies at a scale more relevant to a particular area. The days of broad brush zones and rules have gone.

2. Through the Unitary Plan develop requirements for design statements for new development of a particular size.

This should refer to "urban design" statements, and involve a context analysis and how the urban design of the development responds to this context. Statements are common in resource consent

applications - it is more what is not in them that is the issue. Is there a role here for the Forum to help establish what an urban design context analysis should contain and how we might judge an "adequate" Statement? By itself the Statement is not going to result in good urban design outcomes. Equally important are council staff and independent peer reviews of urban design statements and proposals. These are often equally vague and unhelpful. It is what you judge the Statements against which is important.

3. Support the continuation of the Auckland Urban Design Panel to review major development proposals.

Is it time that the Panel had a stronger mandate? Should the Panel, in some cases, be brought within the RMA process and have a decision making role - for example where the District Plan and the application both identify urban design as the critical RMA / resource consent issue? The other route is to strengthen the use of Independent Hearing Commissioners with urban design knowledge

4. Investigate design competitions and awards and possible incentives through the regulatory process to reward design excellence.

Experience indicates that design competitions are of use in only limited situations. As for incentives in the regulatory process, incentives are called for from the natural environment perspective, as well as the social perspective - every outcome wants an incentive to help it along! There is therefore a bigger question here about how the RMA handles improvements to the environment (social, economic, natural, and built). The best reward for design excellence should be through sustained profitability of the development (higher rents, sales, whatever). The biggest incentive that the regulatory process could offer is likely to be a defined consenting path with some certainty around timelines, processes and inputs.

5. Develop a comprehensive design manual to inform the design and function of new development and the public realm, including the street.

Certainly a combined set of guidelines that pulls together the best out of the myriad of current guides is going to be helpful. There has been some very good guidance produced to date for example on subdivisions and medium density housing. However there are gaps and areas of new guidance required, particularly in regard to medium to high density housing. Apartment developments and taller buildings seem likely on the horizon, given the push towards more compact forms of development.

Conclusion

The draft Auckland Plan is to be commended for its declared commitment to improving standards of urban design and realising a quality, compact city.

Achieving a quality, compact city requires a re-conceptualisation of urban Auckland and its future:

- *The natural and built environments need to be integrated, rather than kept apart;*
- *The natural processes of urban change and redevelopment need to be given greater scope to occur across the urban area so that there is a closer alignment between people's preferences in terms of compact living options and development opportunities;*
- *Planning needs to shift more towards rewarding good design and development and incentivising people, communities and developers to do so.*

In tackling those issues, we suggest Council modifies the Plan to address these three points:

1. *Identify where market-led redevelopment can occur, and ensure that this occurs in a way that leads to a public, not just private benefit. Require the improvement of the public realm and blue and green networks as part of this process.*

2. *In areas where urban redevelopment is needed, but the market is reluctant to take a lead, intensively plan the public realm, including public transport and significantly improve the natural environment. Then free-up the planning process on the private sites to encourage development by either- in some specific circumstances - suspending the provisions of the RMA (as suggested in the 2008 Sustainable Urban Development paper) or by simply declaring all applications within those areas to be non-notified discretionary, but subject to urban design review. Give certainty of time and cost to developers.*
3. *Continue the emphasis city-wide on good urban design and significantly step up the resources and tools that are involved including greater, place-based analysis of urban environments; more discretionary, design-led review processes and well informed decision makers.*