

27 November 2008



Sustainable Urban Development Unit
Department of Internal Affairs,
PO BOX 805,
WELLINGTON 6011

To whom it may concern

Submission on Building Sustainable Urban Communities Discussion Document from the Urban Design Forum of New Zealand

Introduction

The Urban Design Forum of New Zealand (UDF) welcomes the release of the discussion document and sees it as a positive step forward in central government's understanding of the complex range of issues involved in urban redevelopment.

The Forum is particularly pleased to see reference to the central role that "place making" must take in urban redevelopment projects. Our collective experience is that sustainable urban areas only come about from detailed, integrated design-led and place-based initiatives operating within a supportive policy environment. The importance of the document is that it recognises the vital link between macro policy and micro implementation. In other words, it is not just about getting the macro level inputs right; great urban places also need detailed design and management by both the public and private sectors working in partnership. Our main comment on the discussion document is that we feel greater attention needs to be paid to policy that supports design-based processes to develop an integrated vision for an area of redevelopment (a masterplan), as well as the tools needed to successfully implement the agreed masterplan. This covers issues to do with long term compliance with the masterplan and the ability to co-ordinate (on an on-going basis) the many actors involved in the process of redevelopment.

Ambit of the Document

We understand that the document is aimed at 'strategic areas' where central government has major interests. As such it is likely that the additional funding, land amalgamation and planning powers suggested in the document will be applied in only a few cases where these interests apply (ie larger land holdings via Housing NZ). Arguably, the issues identified extend across many parts of the urban area, and the powers that may become available, and the associated funding, should be able to be deployed in a number of areas where central government may not have any direct landholdings, but where there is a "national interest", for example Auckland's waterfront. The document acknowledges this, but is pretty unclear about what provisions would apply outside the strategic areas identified by central government.

Place-based approaches

The importance of design-led, place based approaches to successful urban redevelopment is well established. The document acknowledges this, but then refers to Auckland's One Plan as an example of a place-based approach. However the One Plan is an infrastructure plan and is not an urban design driven plan.

In our view, design-based processes are critical to developing and agreeing integrated spatial visions for areas of redevelopment. They have to be a central vehicle in the redevelopment process, helping to draw together and integrate the often diverse views of how areas should develop into plans that are realistic, viable and founded on the attributes of the place to which the plan applies. Masterplan-type design processes are increasingly being used in New Zealand to inform and drive urban redevelopment and their use needs to be mandated and required in areas identified as redevelopment areas. In the case of regeneration funding in the United Kingdom, places do not receive any funding unless they have completed a comprehensive community plan for all the outcomes.

The important point is that preparation of a masterplan is not an easy or straight forward process, it takes time and commitment from those involved, with much information needed and many design iterations undertaken and considered in an open and transparent way. Masterplans necessarily involve the consideration of a huge amount of detail; they cannot just be high level guiding documents. All of this suggests a much higher level of urban design at the front end of the process, compared to how the paper reads. This makes the funding even more challenging than the paper suggests. In our view, the document would benefit from a much greater exploration of design-based processes to develop plans for areas of redevelopment.

Principles to be applied to redevelopment processes

The document sets out a number of principles that should be applied to redevelopment proposals. Generally they could be said to fall under the heading of sustainable urban design. There is an increasing international consensus on what is involved in sustainable urban design, and the document would benefit from referencing this material. It extends well beyond the simplistic 7Cs of the urban design protocol.

For example, the explicit reference to affordable housing is positive, yet community issues in urban design extend to issues associated with the design of the street network to facilitate ease of movement by all modes and to create livable streets, the mix of activities and opportunities for a wide range of different types of households and businesses to locate in an area, shared social infrastructure and so forth.

As further example, considerations of the natural environment has to consider the potential of design to influence how communities consume resources and influence global issues like climate change, carbon use and ecological footprints. These global issues are increasingly driving urban development agendas into the future. An example of this is a report prepared by the Commission for Architecture and the Built Environment in Britain on urban design and climate change. This report can be found at <http://www.cabe.org.uk/default.aspx?contentitemid=2762> (What makes an eco-town? A report from BioRegional and CABE inspired by the eco-towns challenge panel).

In many ways we have only just begun as a country to understand our towns and cities and to develop a set of principles that draw upon international experience and reflect our landscapes and cultures. The document should support the development of a more sophisticated understanding of “kiwi urbanism” such as through the creation of our own version of CABE.

Tools to implement place-based plans

A critical issue once a place-based plan has been prepared is how to ensure that the plan will be implemented. The discussion document proposes a number of new tools that will be helpful in implementation, including land amalgamation and funding of capital projects.

The proposed redevelopment authorities need a stronger footing on which to argue for good urban design outcomes. The importance placed on urban design, while apparently increasing generally over the last few years, is still often dependent on advocacy by individual professionals, community groups or politicians involved. It is far from uniform. Under the RMA, effects are assessed in terms of ecological and physical criteria, and on a ‘now’ timeframe. We consider, however, that good Urban Design has a social and cultural dimension extending at least a generation out in time. Public agencies which attempt to forward plan the shape of a particular part of the city are open to effective undermining or attack at any time by applicants under the RMA mechanisms arguing on the basis of effects which are physically based [shadowing, noise, wind generation, traffic issues etc], site specific [the applicant’s site only] and over a short timeframe [typically the time taken to complete a development].

It isn’t clear from the document if the new authority / organisation talked about would be given exclusive zoning (RMA) powers for the strategic areas. , We believe that this has to be part of the mix to make such an agency effective. Otherwise the new body may just add to the layers of confusion/ overlap that already exist in the RMA arena, rather than simplify them. Clarity around planning powers will be important in terms of delivering private investment and providing certainty to the public.

This means that in addition to plan making powers, the redevelopment agency / authority also has to be given the power to insist upon alignment of development proposals with that (agreed) master plan. A big hurdle to good redevelopment is also lining up the required infrastructure investment. Vague talk within the document about better co-operation amongst infrastructure agencies is not really going to help here. There has to be an ability to either direct infrastructure bodies to co-ordinate (which means a Minister being able to issue orders), or the redevelopment body having a separate and secure funding stream / source so that it can determine priorities etc. The issue here is that without upfront and integrated investment in infrastructure (including public places and spaces within areas of redevelopment), the goodwill of developers and the general public will be tested. Redevelopment agendas need tangible outcomes of sustainable development to gain buy-in and ongoing support.

Should you have any queries or require any additional information please do not hesitate to contact the undersigned.

Yours sincerely
David Mead

Contact Address:
David Mead
C/- Hill Young Cooper Ltd,
PO Box 99847 Newmarket, Auckland
Ph (09) 529 2684.

About the Urban Design Forum of New Zealand

The Urban Design Forum NZ (UDF) has, since 2000, worked to promote good urban design in NZ. Modelled loosely on similar groups in Australia and England, UDF is supported by the New Zealand Planning, Landscape, Architecture, Engineering and Surveying Institutes'.

The purpose of the Forum is to promote cross-disciplinary understanding of urban design amongst urban professionals, to raise awareness generally at the national and local levels of the benefits of urban design and to 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 run entirely by volunteers, with administration assistance from the New Zealand Planning Institute.