

29 September 2008



Ministry for the Environment  
**MINISTRY FOR THE ENVIRONMENT,**  
**PO BOX 10362,**  
**WELLINGTON 6143**

Attention: **Greg Vossler**

Dear Greg

### **National Policy Statement on Urban Design Submission**

The Urban Design Forum New Zealand welcomes the opportunity to comment on the scope of a possible National Policy Statement on urban design under the Resource Management Act.

The Urban Design Forum of New Zealand is a national organization supported by the New Zealand Planning, Landscape, Surveying, Architecture and Engineering Institutes. We formally operate as a special interest group of the NZPI. The aim of the Forum is to foster the application of urban design in New Zealand, seeking to build collaboration and common purpose amongst built environment professionals. We have a membership of over 300 people.

At our recent launch event in Auckland, one of the actions for the Forum, identified by the audience, was for it to be an advocate for a stronger RMA framework within which urban design could flourish. Many people attending the launch felt that district plans, as they are currently formulated, are a hindrance to the implementation of good urban design. The development of the next round of district and regional policy statements that many councils are about to embark upon was seen to be an ideal time for there to be a more wide ranging discussion of about how to more fully incorporate urban design into the RMA process. As the Forum is still in its formative stages, it has not been possible to gather a comprehensive view of the scope of an NPS from our membership. No doubt, there will be a wide range of views within our membership, and it is likely that many of these views will only be crystallized once a draft NPS is available for comment.

In the interim a small group of UDF members have met to consider the discussion document. Our comments are:

- An NPS that helps to further raise the importance of urban design in the RMA process will be beneficial, helping to avoid any further jurisdictional type arguments that urban design is not a relevant issue under the RMA.
- It will be important that the NPS is based on a sound analysis of current barriers to good design outcomes occurring in the RMA process. Is poor urban design the result of inadequate consideration and dialogue between councils and developers of urban design issues at the pre consent stage; poorly constructed rules in the district plan that disable good design outcomes; inconsistency between the district plan and other codes of practice (eg roading); or the length of time needed to gain consent where discretion is involved and there is insufficient guidance within policies and assessment matters to provide certainty over outcomes? It appears to us that all of these issues need to be addressed in one shape or form. It may be that the NPS will have to concentrate on only one or two of these issues, rather than try to be everything to everyone. However there needs to be a sound evidence base to help determine priorities. We are not sure if such an evidence base exists.

- The NPS needs to be accompanied by resources to assist councils, developers and the community to change district plans in an appropriate way and to ensure adequate implementation. We note that many councils struggle to attract suitably qualified staff, while many smaller developers and builders will not have the resources to engage appropriate advice. Resourcing, skill levels and the knowledge-base are critical issues.
- Urban design thinking is still not well understood outside of professional circles. The community is likely to question some aspects of urban design (e.g. density). Even within the built environment arena, there are many interpretations regarding what good urban design is. To this end, the process of developing the NPS is as important as the content, and the process of preparing any NPS should be used as an opportunity to continue the work stated with People+Places+Spaces and the Urban Design Protocol to explore what urban design means in the New Zealand context.

Any NPS will also have to be very clear about what it is trying to achieve:

- Some councils are well advanced in bringing into their district plans design-based approaches and will consider that a more far reaching policy statement is needed to support stronger urban planning frameworks within which urban design needs to operate.
- On the other hand, many smaller councils are likely to be unsure about how they should address urban design at a more operational level, and will be seeking guidance on specific qualities / urban design principles that should be incorporated into plans.
- Many developers are likely to see a further layer of uncertainty inserted into district plans if only general statements are made within the NPS
- Many professionals are likely to emphasis the need for more integrated design and decision-making processes that move away from resource-by-resource assessments of adverse effects common in the RMA process.

Our concern is that a high level policy statement that attempts to get around all of the above issue by simplifying and abstracting objectives to the highest (or is that lowest?) denominator will not help to advance skills, practice or knowledge, and in fact may stall or hold back many current initiatives.

Overall, we feel that while a potentially positive move, any NPS needs to give careful consideration to how it could be most effectively deployed as one instrument influencing the built environment. We do not think that the work to date on the NPS provides a sufficient basis to say what its content should be as there are so many linkages and interrelationships that need to be considered.

To this end we would be willing to offer the services of the Forum for any future consultation on the scope of an NPS, and for the Forum to act as a sounding board for the wide ranging views of the various built environment professions. We are also aware that members of the UDF will be making individual submissions or submissions on behalf of their companies.

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

Yours sincerely  
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