



*Ministry for the*  
**Environment**  
*Manatū Mō Te Taiao*

# **Scope of a National Policy Statement on Urban Design**

## **Report on Submissions**

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This report may be cited as:

Ministry for the Environment. March 2009. *Report on Submissions on Scope: National Policy Statement on Urban Design*. Wellington: Ministry for the Environment.

Published in March 2009 by the  
Ministry for the Environment  
Manatū Mō Te Taiao  
PO Box 10362, Wellington 6143, New Zealand

ISBN: 978-0-478-33154-7

Publication number: ME 927

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[www.mfe.govt.nz](http://www.mfe.govt.nz)



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# Executive summary

In August 2008, the Ministry for the Environment sought views on the possible scope of a national policy statement (NPS) on urban design under the Resource Management Act 1991 (RMA). A total of 120 submissions was received. Mixed responses were received from some groups of submitters, such as territorial authorities, but overall there was conditional support for the development of an NPS on urban design.

**Reasons for supporting an NPS:** Submitters considered an NPS would be crucial to achieving high-quality, more sustainable urban areas. Submitters stated an NPS would be integral to achieving broad goals of sustainability, economic transformation and improved public health. Submitters agreed that the main advantage of developing an NPS would be to increase consistency and reduce duplication of effort across local authorities. They further considered an NPS would foster a more integrated approach to dealing with urban issues. Submitters also stated a key benefit of an NPS would be to legitimise urban design as a valid matter for consideration under the RMA.

Despite this high level of support for an NPS, many submitters also expressed a range of cautions. A small number questioned if an NPS would add value to the existing resources on urban design. A few also raised the issue of central government resourcing and prioritisation across other NPSs.

**Broader scope:** Many submitters supported an NPS which had a broad scope. Some submitters were supportive of the kind of approach to tackling issues in urban areas being taken by the Department of Internal Affairs.

**Reasons for not supporting an NPS:** Reasons included that a high-level policy tool would not add value to existing guidance, and there were other more effective tools available than an NPS. Specifically, these submitters thought the Urban Design Protocol provided sufficient guidance. Several submitters stated urban design was too broad a concept for an NPS and could result in a 'one-size-fits-all' approach. They further considered urban design initiatives would be best developed at the local level. A few supported an integrated approach to urban design, but thought it was not possible given the limitations of the RMA. A small number were concerned that consultation on the NPS had neither been wide enough nor allowed sufficient time for feedback. Others mentioned the impact on housing affordability and compliance costs as reasons not to develop an NPS.

**Qualities of an NPS:** Most submitters would prefer to see an NPS that was high level, visionary and struck a balance between being not too prescriptive and providing a useful level of direction. Most thought a useful structure would be to set out high-level principles, objectives and policies, but not prescribe the details of how these should be achieved at the local level.

**What should be in an NPS:** Many submitters suggested an NPS should include a specific mandate for urban design under the RMA. A few stated an NPS needed to address growth management issues, while others thought an NPS could usefully deal with a wide range of issues that traditionally might be thought of as 'urban planning'. A small number of submitters suggested an NPS should focus on issues of common concern nationally, because these were matters of importance which might otherwise not be included in a local perspective on urban design.

Many submitters stated an NPS should address integration – between statutory and non-statutory urban design initiatives, and between the RMA and other relevant statutes and government policies which address aspects of urban design. Others thought an NPS should address integrating land use and transportation planning, particularly promoting more sustainable forms of transport.

Further issues suggested for inclusion in an NPS were: infrastructure, liveability, quality of place, quality of public spaces, Māori values, heritage, landscape, biodiversity, housing, retail location, mixed use, natural hazards, access to open space, protection of soils, rural-residential development, safe environments, accessible neighbourhoods, physical health, environmental issues, solar access and protection of the night-time environment.

**What should not be in an NPS:** Many submitters identified issues they considered an NPS should not address. These included global or big-picture issues of national priority, growth management, urban planning and detailed design.

**Scale:** Most submitters thought an NPS should cover all spatial scales, from regions to metropolitan areas to cities and towns to neighbourhoods to individual spaces and buildings. A few submitters did not support an NPS which applied at all spatial scales and suggested several alternatives.

**Implementation:** Many submitters raised concerns about how an NPS would be implemented. Submitters felt an NPS would pose significant resourcing issues for local authorities, particularly small councils. Submitters mentioned the need to develop and maintain knowledgeable people in the urban design field, particularly to assist local authorities.

**Other initiatives:** Submitters thought an NPS would be most useful as part of a package of initiatives which supported better urban design in New Zealand. Submitters suggested initiatives beyond an NPS which could be applied either instead of, or as well as, an NPS. There was a high degree of support for the existing Urban Design Protocol resources. Other initiatives suggested were: amendments to Part 2 of the RMA, and the use of national environmental standards, sharing best practice case studies on urban design, promoting the use of particular urban design tools, encouraging urban design review and investigating urban development agencies.



# **1 Introduction**

## **1.1 Background**

In August 2008, the Ministry for the Environment sought views on the possible scope of a national policy statement (NPS) on urban design. A background paper was made available to a wide range of parties including local authorities, iwi, planning and urban design practitioners and developers. The background paper posed several questions for people to consider in relation to the scope and direction of an NPS. For the list of questions posed refer to Appendix A.

## **1.2 Purpose of this document**

This document summarises the views expressed in the 120 submissions received. It does not attempt to analyse these views or provide any recommendations in response to the points raised as this will form part of the report back to government in 2009. For a list of submitters refer to Appendix B.

## 2 Submissions overview

### 2.1 Breakdown of submissions by organisation type

A total of 120 submissions was received. Table 1 gives a breakdown of the submissions by organisation type. Figure 1 shows the proportion of submissions by organisation type, as a percentage of all submissions received.

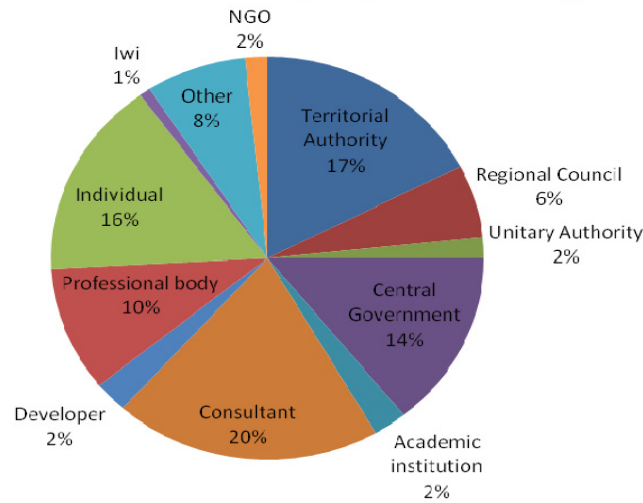
**Table 1: Number and percentage of submitters by organisation type**

Organisation type	Number of submissions	%
Consultant	24	20
Territorial authority	21	17
Individual	19	16
Central government	17	14
Professional body	12	10
Other <sup>1</sup>	9	8
Regional council	7	6
Academic institution	3	2
Developer	3	2
Unitary authority	2	2
Non-governmental organisation	2	2
Iwi	1	1
<b>Total</b>	<b>120</b>	

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<sup>1</sup> 'Other' includes organisations such as infrastructure providers, groups with an interest in sustainability issues and organisations representing groups of local authorities.

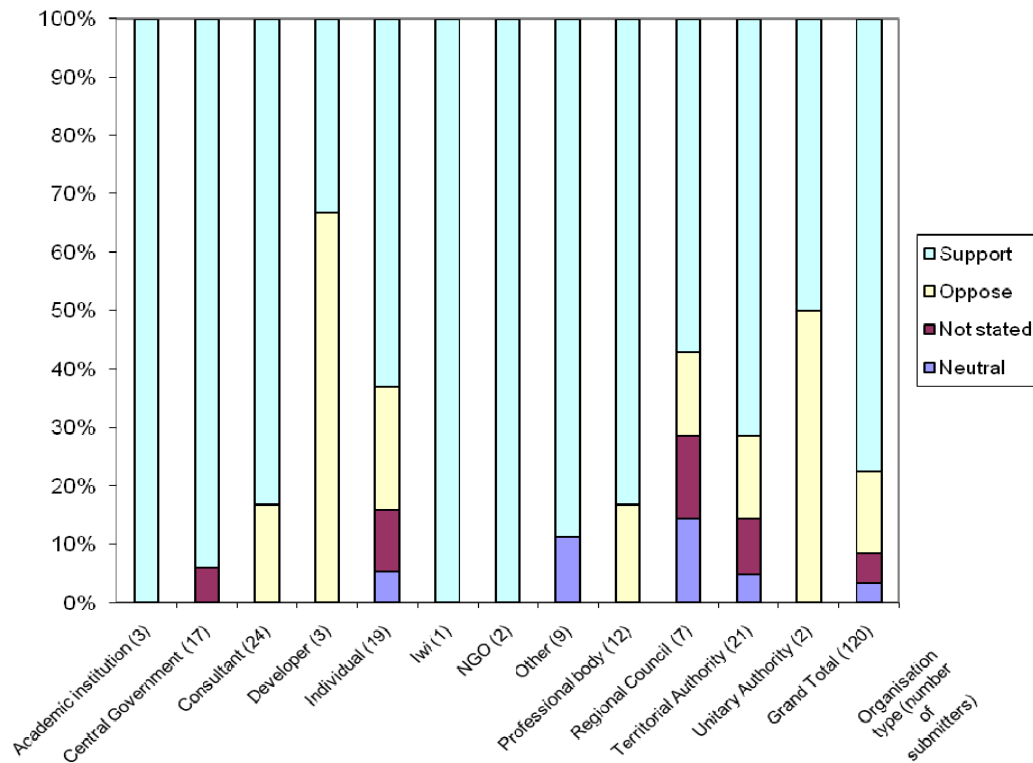
**Figure 1: Submissions by organisation type**



## 2.2 Breakdown of submissions by level of support for an NPS

Most submitters supported the development of an NPS on urban design. Figure 2 shows a breakdown of submissions by organisation type and stated level of support for an NPS. Levels of support are categorised as ‘support’, ‘oppose’, ‘not stated’ or ‘neutral’.

**Figure 2: Level of support for an NPS by organisation type**



The highest levels of support came from academic institutions, central government, consultants, iwi, non-governmental organisations (NGOs), professional bodies and ‘other’ organisations. Developers showed the highest level of opposition of any organisation category (keeping in mind there were only two submissions from this sector). A mixed response was received from individuals, regional councils and territorial authorities.

# 3 Levels of support for developing an NPS

About 75 per cent of submitters conditionally supported the development of an NPS on urban design. The many and varied reasons are summarised below. This also includes several submitters who questioned whether an NPS would add value to the existing central government guidance on urban design.

## 3.1 Reasons for supporting an NPS

A small number of submitters considered an NPS would be crucial as a means to achieving high-quality, more sustainable urban areas. Many saw an NPS as essential in improving the design and quality of living environments for all:

High quality urban design is of national importance. Over 87 percent of New Zealanders live in urban areas and the quality of the design is critical to their well-being ... High quality urban environments can facilitate the economic prosperity of a city and region and are a component of creating national and international competitive advantage. (92)<sup>2</sup>

A few submitters stated an NPS on urban design would be integral to achieving the Government's broad goals of sustainability, economic transformation and improved public health:

Many different aspects of sustainability come together in urban design. In many instances urban design provides the local responses to national and international sustainability issues, such as energy use and climate change. (60)

...an NPS will confirm the significant influence urban design has in promoting the purpose of the RMA. It will also assist in achieving the New Zealand Transport Strategy's objectives and targets. (112)

The NPS could play a particularly significant role in giving effect to the New Zealand Energy Strategy's stated commitments to develop resilient and low carbon transport; use energy more efficiently; support low emissions power; and foster greater affordability and wellbeing. (21)

Good urban design supports health and wellbeing ... for instance the promotion of active transport such as walking and cycling can significantly contribute to key government health strategies such as in Healthy Eating Healthy Action... (114)

Submission 114 also set out an extensive list of how good urban design can support health and wellbeing, including providing opportunities for physical activity, improving social connection and personal safety.

Many submitters agreed that one of the main benefits of developing an NPS would be to increase consistency and reduce duplication of effort across local government.

An NPS would provide consistency of urban design principles at a high level. (102)

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<sup>2</sup> The numbers included in brackets relate to specific submitters as listed in Appendix B of this report (refer page 47).

An NPS that sets out and explains those [urban design] principles in some detail would serve a useful purpose in generating greater consensus across the industry with both developers and regulatory authorities. (56)

[...an NPS could] provide a stronger focus on design; the assurance that urban design is considered at the earliest stage of a development process and high quality design must be delivered as a result; and consistency throughout the country in approach and delivery of urban design through statutory and non statutory mechanisms, processes and initiatives. (88)

Many submitters saw the benefit of an NPS as helping to achieve a more integrated approach to dealing with urban issues. (This is discussed in further detail in section 5.5.) For example, submitter 17 stated:

An NPS on urban design provides a welcome opportunity to reframe/reinterpret/clarify that ... planning to achieve sustainable communities is a complex and challenging business, where success depends on having a broad range of mutually reinforcing policies, including those developed under local government, resource management, transport and building legislation – so that policy integration across these statutes is crucial.

Many submitters stated a key benefit of an NPS would be to legitimise urban design as a valid matter for consideration under the RMA. (This is discussed in further detail in section 5.2). For example, submitter 111 stated:

...central government needs to develop an NPS on urban design to progress the legislative support for urban design. Without a clear implementation framework the principles of urban design will continue to be dependent on those councils and developers that have a commitment to urban design.

An NPS will provide direct support to design related plan changes ... it provides the opportunity for urban design principles and practices to be given greater weight in resource consent processes. (107)

Submitter 25's views were indicative of many respondents who have supported work on the Urban Design Protocol and who consider an NPS as a useful extension of this work. (This is discussed in further detail in section 9.1.)

An NPS on urban design is critical as it cements the gains made by the New Zealand Urban Design Protocol and mandates urban design within the RMA framework.

Submitter 66 focused on the benefits of an NPS from a Māori policy perspective. They considered that an NPS would provide:

...a vehicle to introduce the broader paradigm of cultural landscapes into national policy reflecting Maori issues, needs and aspirations, as articulated in the Te Aranga Maori Cultural Landscapes Strategy.

Several submitters thought an NPS would be most useful as part of a package of initiatives which supported better urban design in New Zealand. (These are discussed in further detail in section 9.) For example, submitter 34 stated:

...even though an NPS under the RMA could be an appropriate method to achieve excellence in urban design, it is not the only one available and it should not be used alone. Other implementation methods ... should be used at the same time.

## 3.2 Support for a broader scope

Many submitters supported an NPS which had a broader scope than that suggested by the definition of urban design as included in the background paper:

If an NPS is prepared it should have a wider coverage than simply urban design matters; it should include all key matters relating to building sustainable urban communities, including a consideration of urban form and design. We would suggest that you consider an NPS on urban sustainability. (38)

What is needed is an NPS on sustainable urban development, which will of course inevitably involve urban design processes. (58)

...in the absence of an NPS on urban planning, an NPS on urban design would need to address many issues generally held to be core planning issues. (105)

A number of submitters were supportive of the broad approach to tackling issues in urban areas being explored by the Department of Internal Affairs in the discussion document *Building Sustainable Urban Communities*. For example, submitter 36 stated:

It is essential for the NPS process to be connected practically and strategically with the Building Sustainable Urban Communities programme under way under the direction of the Department of Internal Affairs. Integration of these two initiatives may require a two phase process: – first, a comprehensive statement of government policy on urban design and planning that deals with substantive issues, irrespective of the statutory purpose of the RMA, – second, an NPS on urban design under the RMA that deals with those aspects of the wider strategy that fall within the more narrowly defined purpose of that Act.

...the DIA approach is more likely to lead to better policy, remove barriers to implementation, and create better tools for implementation of the Urban Design Protocol at a local level than the current MfE approach. (96)

## 3.3 Cautions from those supporting an NPS

Despite this high level of support for an NPS, many submitters also expressed caution about its development. A number questioned if an NPS would add value to existing urban design resources. A few also raised the issue of central government resourcing to assist with its implementation and its priority relative to other NPSs.

There are similarities between these concerns and the reasons submitters gave for not supporting an NPS. (These reasons are discussed further in section 3.4.) The key difference is they are largely premised on a position of general support for an NPS, but with a view to making sure it is effective and its scope is clearly defined.

A few submitters were also concerned about an NPS being pitched at a very general level:

...there are a number of significant disadvantages to a general urban design NPS. It would add little to the Urban Design Protocol but take significant resources, avoid focussing on key issues confronting urban areas that require urgent support, and be unlikely to meet the section 32 tests. (52)

Urban design is a very broad concept indeed, meaning there is a danger that if the scope is not clearly defined, and distinctive, the national policy statement could easily become ‘all

things to all people', challenging and constraining no one, and thus liable to be fully agreed with in theory and effectively ignored in practice. (87)

Care should also be taken to ensure that the NPS is not seen as a panacea to all. While interrelated, past discussion on the NPS has included regional infrastructure, vehicle emissions, sustainable transport, urban growth, resource management and planning matters. We believe that matters such as these are better addressed through other means but with reference to the NPS. (88)

Others were concerned about an NPS being too prescriptive:

If urban design becomes excessively descriptive and is included in detail in the RMA then in all likelihood this will open up a whole new field of activity for the legal profession to argue and to decide on what is good urban design. (118)

A few submitters questioned if an NPS was the right tool to really improve urban design outcomes:

...in answer to the question whether good urban design can be legislated for our response is – yes – for some limited elements. This highlights the limited additional value an NPS might have on urban design. It also needs to be recognised that the potentially more influential role of promoting good urban design is the ongoing promotion of best practice. (100)

...the key question is what would an NPS add and would it assist with the implementation of quality urban design? (104)

...further analysis is required to confirm whether or not a national policy statement is the most appropriate way in which to provide guidance on urban design, identify urban design as a matter of national significance, and legitimise urban design under the RMA. (39)

Others questioned exactly what it was that an NPS on urban design would be trying to do:

Any NPS will also have to be very clear about what it is trying to achieve. (65)

If the aim of the Ministry is just to mandate urban design within the RMA then an NPS focussing on urban design could achieve this. If the intention is to strengthen the RMA to allow for better urban development outcomes in the long term and/or consideration of social, cultural and economic effects, then some further analysis of alternative options including amendments to the RMA need to be carefully considered ... If not thought through properly, an NPS could end up making very little difference... (89)

Submitter 89 also noted concerns about the policy process associated with developing an NPS:

...we note that generally good policy development requires the identification of specific problems or issues before deciding which mechanism would be the best tool to solve these identified issues or problems. With the NPS process we see the policy tool decided before the aims, objectives and policy problems are even decided. This process essentially locks us all into an outcome – in this case an NPS before any robust debate has even occurred as to whether an NPS is the best choice. We look forward to seeing some robust upfront problem definition, policy analysis and cost/benefit analysis.

A small number of submitters wanted to ensure that an NPS could be distinguished from the Urban Design Protocol:

...the NPS must be distinguishable from existing guidance on urban design, including the Urban Design Protocol, and must add to that existing body of material. If the NPS were too

similar to the Urban Design Protocol, the value of the Protocol would be significantly diminished. (5)

Given this [the Ministry's limited resources], and also given the Act's section 32 requirements, I consider that an NPS could only be justified if it provides clear guidance on urban design and urban design outcomes which is not currently available, which has the potential to significantly clarify key urban design issues impacting on urban outcomes across many of New Zealand's towns and cities, and to significantly improve urban design outcomes in them. An NPS which took as its focus the current non-statutory Urban Design Protocol, without a strong focus on key issues is to my mind in the 'nice to do but not urgent' category. (44)

Other submitters also mentioned the issue of resourcing:

We would prefer that MfE's urban design resources remain focussed on further developing the reach and influence of the Protocol, sharing best practice and providing capacity building resources. We are aware there is now a small staff resource working on the Protocol within MfE, and would be concerned if their time and energies were diverted to the NPS, at the expense of the Protocol. (108)

We do not think that the government should produce a national policy document that requires detailed annual reporting to a government minister and the employment of staff to manage and monitor another process. (118)

### **3.4 Reasons for not supporting an NPS**

About a quarter of submitters were either neutral or did not support the development of an NPS on urban design. The reasons given were wide ranging and included:

- a high-level policy tool would not add value to existing guidance
- there are other more effective tools available
- the Urban Design Protocol provides all the guidance necessary
- the concept of urban design is too broad for an NPS
- urban design initiatives are best developed at the local level
- a NPS would be a 'one-size-fits-all' approach
- an integrated approach to urban design is necessary but not possible under the limitations of the RMA
- consultation on the NPS has not been wide enough or allowed enough time for feedback
- impact on housing affordability
- compliance costs
- an NPS would legitimise urban growth strategies such as Smart Growth
- other priorities for national guidance.

Submitter 108 summed up the concerns of many submitters:

If an NPS is the answer, then quite what is the question?

Several submitters were concerned a high-level policy tool would not add value:

A high level policy along the lines of any of the other policy statements to date would not add anything meaningful to planning or resource consent processes. It would simply add to the increasing range of regulatory instruments that must be analysed every time there is an application or plan change... (96)

Many mentioned other tools which would be more effective:

...in many instances good urban design is more likely to evolve from collaboration between councils, developers, and urban designers than as the result of regulation via an NPS. (15)

More effective than a national policy statement would be tools under the Local Government Act... (20)

...partnerships addressing urban community outcomes, reserves planning, town and city centre strategies, Mainstreet programmes, infrastructure management plans, community driven social engagement programmes and projects will, collectively, do more for better urban outcomes than a limited tool drawn at a very high level (or detailed prescriptive) way. (108)

An amendment to Part II of the Act, including the purpose of the Act and the matters of national importance, to broaden its purpose and provide for urban design may be more powerful and effective. (74)

Specifically, the Urban Design Protocol was seen as an existing resource that provided all the necessary national guidance:

...the Ministry's Urban Design Protocol provides a satisfactory focal point for urban design decision-making... (15)

The development of a urban design NPS is not necessary or appropriate at this stage, particularly given the presence of the Urban Design Protocol. (82)

[We are] committed to good urban design as a signatory to the Urban Design Protocol, and this is considered a sufficient guideline to influence and inform urban design at the local level. (35)

...questions whether the NPS will add value to the Urban Design Protocol ... It seems quite pointless to initiate the NPS process without undertaking an evaluation of the implementation of the current Urban Design Protocol. (96)

Some submitters stated that because urban design was a broad concept it was too difficult to deal with through an NPS. For example, submitter 9 stated:

I currently have serious concerns about installing these principles in a national policy statement. Even though there are many well accepted principles, urban design is a highly subjective matter, with few clear boundaries as to what is, and what is not, 'urban design.

Many submitters stated that the local level was where it was most appropriate to deal with urban design issues.

Urban design is highly context specific. It is therefore important for urban design initiatives to be developed at the local level as appropriate, rather than being driven by central government national directives. (82)

A national policy statement is unlikely to address local issues in an effective way. The design of our urban areas is best addressed locally where 'town specific' matters can be debated ... It is not realistic to set national objectives and policies that would be usefully implemented at a local level. (20)

NZ has a diverse range of landscapes and cityscapes ... AN NPS cannot adequately cope with this diversity. (53)

...does not support the development of the national policy statement for a range of reasons including the ... influence of central government policy on local authorities who have the ability now to promote urban design through their district plans, taking account of local conditions that influence design outcomes. (35)

Submitter 119 considered an NPS could result in a duplication of effort, particularly in Auckland where there were processes in place to ensure integration of land use and transport planning through the Local Government (Auckland) Amendment Act 2004 (LGAAA):

...[if a prescriptive approach is taken by the NPS] this has the potential to duplicate the LGAAA plan change process, which required local authorities in the Auckland region to amend planning documents to reflect the Auckland Regional Growth Strategy's objectives of land use and transport planning integration.

A few submitters considered that an NPS would effectively enforce a 'one-size-fits-all' approach, not allowing for local and context-specific variation:

...it seems to be a big metropolitan or city planning tool poorly focussed on the needs of all urban areas. (108)

...the NPS may provide a 'one size fits all' approach that fails to meet the needs of our diverse communities. (96)

...national policy statements are a heavy handed planning device, which leads to 'one size fits all' outcomes that fetter local decision making and community outcomes. (55)

Submitter 42 was concerned that an NPS would result in too much regulation:

Many of the councils around New Zealand will seize the opportunity to introduce far reaching rules using any national policy statement as justification ... It is this sort of micro management that holds fears for us.

The limitation of trying to develop an integrated NPS under the RMA was discussed by submitter 18:

...in order for an NPS to achieve well-designed urban places and spaces, it would need to be integrative in its approach. It would have to cut across the RMA, Local Government, Land Transport Management and the Building Act. We do not believe that an NPS could adequately achieve this.

A small number of submitters had concerns about the consultation process:

How representative is the submission process? If the information received is strongly skewed, is that a good basis for decisions about an NPS? (53)

Our concern is that the consultation has centred largely with the regulators and not the practitioners [developers]. (42)

National policy statements go largely unnoticed and slip through the participation net and hence participation is dominated by well-organised lobbyists and pressure groups. (27)

...local authorities have been given very little time to consider the option of creating an NPS on urban design owing to the limited consultation period. (35)

...it does not state the motivation for the NPS on urban design ... [We are] concerned that MfE may have misinterpreted feedback from a prior consultation process; the background paper only lists parties to the consultation and not the actual feedback received by the government ... As such we cannot identify that there actually is a clear mandate to establish an NPS on urban design among stakeholders. (96)

A few submitters mentioned that an NPS would impact on housing affordability and growth of cities:

[The submitter] is concerned about and does not support the development of the national policy statement on urban design for a range of reasons including ... housing affordability... (35)

...by introducing many specific rules or guidelines which councils hold as sacred the costs of developing even a single dwelling on a standalone section can increase. (42)

Concentration on the management and regulation of growth rather than enablement of growth makes the focus of the statement restrictive rather than conducive for growth. (82)

Other submitters mentioned compliance costs as a reason not to develop an NPS. (This issue is discussed in further detail in section 8.2.)

The process of developing a national policy statement would be a long, costly and difficult process. (74)

[The submitter] is concerned about and does not support the development of the national policy statement on urban design for a range of reasons including ... compliance costs... (35)

A small number of submitters were concerned that an NPS would simply be another vehicle to promote the concepts of Smart Growth. For example, submitter 27 stated:

...indicates that the real intention (of at least some of those previously consulted) is to legitimise the disastrous theory of Smart Growth by using a policy statement to direct and enforce growth management strategies, and other policies and rules, intended to direct and control the use of land in order to change and modify New Zealanders' behaviour and preferences.

A few submitters thought an NPS on urban design should be a lower government priority than other issues. For example, submitter 18 stated:

Our primary issue is whether a national policy statement on urban design should be a priority. We believe there are other priorities that would benefit from a national policy statement, such as dealing with indigenous biodiversity and clarifying the use of 'significant' for identifying natural and cultural heritage.

We wonder what is driving the need for an NPS on urban design among the many other priorities facing our government. (96)

# 4 Characteristics of an NPS

## 4.1 What characteristics, qualities or attributes should an NPS have?

The background paper asked submitters to consider any other qualities that would contribute to the effectiveness of an NPS on urban design, aside from the level of detail and nature of the direction it might contain. Most submitters responded by agreeing with views expressed in previous consultation, or providing a list of adjectives describing the kind of characteristics an NPS should reflect. The following list summarises the key qualities submitters mentioned, in descending order of popularity:

- high level
- integrated
- place based, allows local solutions
- not too directive or prescriptive (although many submitters also mentioned the importance of striking a balance between being too prescriptive and too broad)
- contains objectives and policies
- visionary or inspirational
- proactive
- based on some, or all, of the Urban Design Protocol principles
- short
- describes the roles of central government, local government and regional councils
- collaborative
- flexible or responsive
- long term or future focused
- directive (but note support above for an NPS that is **not** too directive)
- includes indicators or other means of monitoring
- process based
- empowering and enabling
- simple and straightforward
- sets out the benefits of urban design
- clear on detail of implementation
- includes expected outcomes
- positive
- useful
- realistic
- market oriented
- promotes a unique New Zealand model, rather than based on an overseas model
- ‘pushes the envelope’ in terms of design and practice.

## 4.2 Structure

Overall, submitters would prefer to see an NPS that was high level and visionary. Most thought a useful structure would be for an NPS to set out high-level principles, objectives and policies, but not prescribe how these should be achieved at the local level. A few suggested specific principles; others referred to various overseas models as being a useful structure to follow (for example, the United Kingdom's Planning Policy Statement 1 – Delivering Sustainable Development).

Some submitters thought an NPS should start by setting out what the value and benefits of urban design were:

Given the relatively low level of urban design awareness and capacity within local government, it may be useful for an NPS on urban design to have a preamble outlining the nature of urban design and its value. This could be based on existing material in the Urban Design Protocol, the Value of Urban Design, and People+Places+Spaces. (49)

The NPS should define the strategic value of urban design and the need for design excellence in development of the urban built environment... (111)

Many submitters agreed that an NPS would need to be visionary and set at a high level. For example, submitter 114 stated:

We believe that an NPS on urban design should provide a common vision ... The NPS is an opportunity to agree a new approach to urban design that is guided by a shared vision of our urban areas.

The NPS should be inspirational and enabling... (111)

It should define principles which underlie good urban form and structure and appropriate built responses ... It should deal with key design principles and how these result in good design outcomes. (50)

...if an NPS is prepared it could be structured around a series of high level statements rather than detailed information or requirements. These statements could give weight to the Urban Design Protocol and the advice that is contained within this. (35)

Many submitters recommended a cascading structure, starting with high-level principles, then objectives and policies. Often the principles in the Urban Design Protocol (the seven Cs) were referred to as a good starting point:

The structure should start at a high level, then go down to more specific matters... (17)

The content should be structured around the following:

- Statement of high level urban design principles (these could be based on those already developed as part of the NZ Urban Design Protocol);
- Statement of how these principles must be applied through the RMA process, including resource consents and plan preparation...;
- Clear policy statements on a selection of key urban design issues, where these can be simply and succinctly stated and where they are of national significance. (25)

Submitter 24 provided a lot of detail about a possible four-tier approach (abridged here):

At a high level, the NPS says that urban design needs the support of good urban planning. It also needs the close attention to detail at the consent/development stage...

1. At the macro level, councils should develop [non RMA] spatial strategies to provide a context for specific urban design provisions...
2. At the micro level, the NPS should go on to state that the quality of the built environment as it relates to the public environment is a matter of national importance...Consent triggers would be incorporated to this end. This is the minimum that councils should address...
3. ...the relevant aspects of the spatial strategy under 1 could be drawn upon to further develop local level RMA policy on urban design. The NPS could provide an enabling clause that refers to the need to take into account these strategies when exercising functions/powers under the RMA.
4. If a council puts in place the spatial strategy under 1, then there would be incentives available in the form of resources and assistance to help implement better urban design under 3...

A few submitters suggested that further detailed information around implementation should be included as part of an NPS but perhaps in a separate document:

It should contain a series of objectives under a short list of key topic areas ... A more detailed list of policies or principles should then be set out ... it is recommended that the NPS contains a number of references to consistency with a parallel but more prescriptive document or documents (e.g. People+Places+Spaces). The references should be as directive as possible in order to reduce the potential for legal challenges. (105)

...a national policy statement on urban design would be most effective if it provided high level principles that were backed up with supplementary guidance. (102)

A way to achieve this may be to have a two tier document structure where the top level sets out the principles that need to be achieved for a development to succeed, and the second level is a more technical document (or suite of documents) that are called up as matter for consideration, and may be updated over time. (47)

A small number of submitters suggested the structure of an NPS should be based around scale:

...recommends that a national policy statement be structured around the different spatial scales ... metropolitan, community and site. This would reflect the different nature and scale of the issues at each of these levels. (92)

Submitter 117 suggested a structure based around priority urban areas:

Given the immediacy of urban design issues in some regions (i.e. Auckland) an NPS must address urban design in both the short and long term ... By specifically acknowledging key regions/cities within New Zealand, the NPS can address urban design in a more targeted manner where appropriate ... A mixed approach which provides for high level guidance for the whole nation at a principles level, but also focuses down with more targeted, short term goals for key regions and cities may better ensure the desired movement to better urban design is achieved.

Many submitters suggested an NPS would need to contain principles, objectives, policies and guidance which were practical, with some making reference to existing models that could be useful in developing an NPS:

...we envisage that the NPS should contain more detail around **how** the high level direction can be put into effect. This is likely to be quite directive ... The national policy statement on Electricity Transmission adopts this level of direction. (112)

The structure for the NPS on urban design could follow that set out by the New Zealand Coastal Policy Statement – i.e. Interpretation, Objectives, Policies, Schedules, Glossary. (73)

One of the best examples of this...is the English PPS/PPG system – starting with PPS1. The suite of government policy directions are clear, specific and thorough, with urban design ... being central to the planning framework ... the NPS on urban design must deliver, or be part of, something of this order. (17)

Submitter 68 suggested specific wording for principles contained in an NPS:

Policy content should be at the level of enunciating principles to apply in urban development planning ... in the form of ‘should undertake enquiries into ...’, ‘should account for ...’, ‘should have regard to ...’, ‘should avoid ...’.

## 5 Issues an NPS should address

Submitters were asked to comment on what issues of national significance an NPS on urban design should address and what relative priority they should be assigned. A small number of submitters attempted to prioritise issues, with most stating they were ‘all important’. Consequently, the following issues are not listed in any particular order and do not represent any form of prioritisation.

There was some confusion between issues of ‘national significance’ and those of ‘national importance’. The RMA states that a national policy statement can be developed for issues of ‘national significance’. This is different from the matters of ‘national importance’ set out in section 6 of the RMA, which all decision makers are required to recognise and provide for.

A small number of submitters simply stated an NPS should deal with ‘sustainable management’ issues (referring to section 5 of the RMA) without elaborating on what these might be in terms of urban design.

Many submitters proposed using the principles in the Urban Design Protocol as the basis for developing issues of priority in an NPS. A few also suggested alternative principles set out in other publications (see section 9.10).

### 5.1 Global and big picture issues

Some submitters argued that an NPS should address global issues, because these were matters of national importance that might otherwise not be included in a local perspective on urban design:

A issue of national importance is sustainability. A truly sustainable environment provides for social, economic, environmental and cultural elements equitably. Urban design has the ability to help deliver more sustainable environments. (64)

The big picture issues suggested for inclusion in an NPS included:

- sustainability
- climate change impacts and adaptation
- energy use, energy efficiency
- peak oil and an imperative to reduce the need to travel and depend on motor vehicles
- urban energy, water and food supply systems.

Of note is the overlap between these issues and the bigger picture reasons other submitters gave for supporting the development of an NPS. This is discussed earlier in section 3.1.

### 5.2 Mandating urban design under the RMA

Many submitters suggested that an NPS on urban design would be useful because it would mandate urban design under the RMA. In particular, it would elevate the status of urban design and enable councils to combat any criticism for taking into account urban design in preparing district and regional plans. An NPS could “unambiguously assert that the Act’s definition of natural and physical environment includes the urban environment” (submitter 6).

Submitter 48 stated that:

... an excellent outcome would be a revision of the current very narrow assessment of effects criteria in resource consent applications. Effects are assessed in terms of ecological and physical criteria, and on a 'now' timeframe ... Councils which attempt to forward plan the shape of a particular part of the city are open to attack at any time by applicants under the RMA mechanisms arguing on the basis of effects which are physically based, site specific, and over a short timeframe.

It was suggested that mandating urban design under the RMA would enable councils to achieve urban outcomes beyond the biophysical emphasis of the RMA. An NPS on urban design would also stop debate about whether or not urban design was a legitimate concern under the RMA – a position summed up by submitter 73:

The RMA has been inconsistently interpreted and implemented in regard to urban design matters. The Act has not provided sufficient direction to consent authorities in the formulation and administration of regional and district plans ... urban design has not been a matter of priority for consent authorities. The solution to this impasse is a national policy statement.

Submitter 35 reflected the views of many submitters:

An NPS could play a role at this stage by confirming that the delivery of high quality urban design outcomes is a legitimate expectation of sustainable management.

Submitter 89 summarised local government's position by stating there were mixed views within the sector, and whether or not there was a mandate under the RMA was a cause of debate. Some councils consider they already have a mandate and are addressing urban design issues through their existing planning frameworks, whereas others are concerned about jurisdictional issues:

An NPS would mandate urban design within the RMA framework which would make councils jobs easier in terms of taking into account urban design matters as part of district plan preparation, plan changes and resource consent processing. (89)

An NPS ... may be beneficial, helping to avoid any further jurisdictional type arguments that urban design is not a relevant issue under the RMA. (104 and 65)

The prolonged and costly legal processes to resolve RMA policy and consent issues in the absence of sufficient central government guidance results in mediocre (vague, inconsistent, and ineffectual) policy. (17)

## **5.3 Growth management, urban form, intensification**

Many submitters stated that an NPS on urban design needed to address growth management issues. They referred to the urgent need for policies that would deal with:

- growth and development that was more sustainable
- encouraging a more compact urban form
- avoiding low-density urban sprawl
- increasing densities
- intensification, especially around transport nodes and along public transport corridors

- setting urban boundaries or metropolitan urban limits
- urban containment
- encouraging a mixture of activities.

Reasons why an NPS should deal with these issues included:

Growth management issues are inextricable from urban design issues. A basic driver of New Zealand's dominant urban growth pattern is the practice of designing urban road networks with priority for traffic volume and speed, rather than for public transport, walking, cycling, the quality of the public realm, maintenance and enhancement of local character, mixed use, adaptability and low environmental impact. An effective NPS on urban design will inevitably address issues of urban form, intensification, and location of new development, as these issues are directly relevant to what constitutes good urban design. (49)

Growth of towns and cities is delivering urban sprawl and intensification. Greenfield subdivision is putting pressure on infrastructure, productive agricultural land and requires more reliance on car use rather than a range of transport options. Intensification of the existing built areas is putting pressure on amenity and character of these established areas. (25)

It [an NPS] needs to provide clear policy direction that requires TLAs [territorial local authorities] to avoid further expansion and investment in dysfunctional urban patterns; it must provide policy direction upon the need to adapt current urban form and build resilience for urban communities in the face of an increasingly uncertain global future. (36)

A few submitters thought there was already a high level of support for encouraging more sustainable urban growth but that further direction was required on how to put these principles into practice:

Most large urban centres in NZ now have urban development strategies. All have traversed the same issues, options and challenges and all desire to make urban settlement more sustainable over time. All seek (but perhaps to different degrees) more sustainable urban form (including higher densities and mixed uses integrated with passenger transport and improved walkability, reducing the rate of urban sprawl and ensuring better development and design outcomes). An NPS should provide clear direction on these important elements of urban design and a requirement that they must be pursued in all regional and district plans. This would assist in moving the argument on from 'what' to 'how' and assist in an enhanced focus on improving implementation. (104)

Submitter 35 cautioned it may not always be appropriate to pursue goals such as intensification and, for this reason, an NPS should focus on the processes involved in giving consideration to such issues:

Any NPS could highlight processes and steps that could be followed when considering urban growth, intensification, greenfield and brownfield development. There could be clear statements that intensification is not appropriate in all circumstances.

## 5.4 Urban planning

A small number of submitters discussed whether there was, in fact, any difference between 'urban design' and 'urban planning' and if it would be possible to produce an NPS that confined itself to a narrower definition of urban design. Many thought an NPS could usefully deal with the wider issues which traditionally might be thought of as 'urban planning' but were part of an

all-encompassing definition of ‘urban design’, such as that used in the Urban Design Protocol. For example, submitter 105 supported an approach like that taken in the United Kingdom’s Planning Policy Statement 1, which states that “good planning is indivisible from good design”.

This statement supports the inter-related nature of urban planning and urban design referred to above. In attempting to agree exactly where urban planning stops and urban design begins, [we] concluded that in the absence of an NPS on urban planning, an NPS on urban design would need to address many issues generally held to be core planning issues. By way of example ... transport/land use integration and increasing the use of public transport were fundamental urban design issues, as was the protection of heritage buildings and places. These principles are widely considered to be basic tenets of good urban planning.

Submitter 89 also discussed this issue, stating:

A number of councils also made the point that perhaps an NPS should be more about elevating the status of urban planning and the recognition that planning to create liveable community environments is a matter of national significance. That the underlying patterns of settlement in a district or region and the component structures of these settlements were more important in terms of a possible NPS than specific design matters.

A few simply stated that an NPS should bring back and legitimise strategic planning.

## 5.5 Integration

Many submitters stated it was the clear purpose of an NPS to address integration – between statutory and non-statutory urban design initiatives and between the RMA and various other pieces of legislation and government policy which deal with aspects of urban design. Most common was a call to integrate the RMA with opportunities to carry out community-based strategic planning under the Local Government Act 2002. (Integration between land use and transport planning was also a significant issue and is discussed separately in section 5.6.) For example, submitters 60, 92 and 107 stated that:

A significant role for a national policy statement is to promote an integrated approach to urban design across the built environment. An integrated approach to urban planning and design at the sub-regional scale and across the relevant legislation will achieve a more sustainable sub-regional urban form when all pieces of legislation operate together, in particular the Local Government Act, Land Transport Management Act and the Resource Management Act.

A small number of submitters stated many urban design outcomes were being addressed under various planning exercises carried out under the Local Government Act 2002. The benefits of this were a collaborative, less regulatory approach which involved the community and included more flexibility. A few submitters expressed frustration these documents did not hold much weight when land use decisions were made under the RMA. For example, submitter 89 stated:

We note the opportunity for growth planning and urban planning exercises under the LGA processes, but also note the limited statutory weight this planning has under the RMA when it comes to the crunch of resource consent decisions. We suggest that it may be useful for the NPS to make the link to urban planning under LGA processes and the link that decisions made on development of the urban environment also have social, economic and cultural consequences.

Submitter 110 stated that:

It is imperative that the NPS provides an integrated approach to urban design which brings together and rationalises the imperatives embedded in a variety of statutes that go beyond simply the RMA...It is not appropriate that the NPS be constructed only in the context of the RMA. This would be antithetical to the demands of planning for and managing the complexity of urban systems.

Specifically mentioned legislation and government policy that should be integrated with the RMA included:

- Local Government Act 2002, including the use of Long Term Council Community Plans
- Land Transport Management Act 2003
- New Zealand Transport Strategy
- national and regional land transport programmes
- regional land transport strategies
- New Zealand Energy Strategy
- New Zealand Energy Efficiency and Conservation Strategy
- Building Act 2004, New Zealand Building Code and Building Regulations
- Healthy Eating, Healthy Action Strategy
- Reserves Act 1977
- Historic Places Act 1993
- Civil Defence Emergency Management Act 2002
- conservation management strategies
- Marine Reserves Act 1971
- New Zealand Disability Strategy
- Fire Service Act 1975
- New Zealand Tourism Strategy.

## 5.6 Linking land use and transportation

Many submitters thought a key issue that an NPS should address was integrating land use and transportation planning, particularly promoting more sustainable forms of transport. The benefits of such an approach were numerous, including reduced reliance on private motor vehicles, reduced emissions and energy consumption, health benefits, more viable public transport systems and economic benefits. For example, submitter 100 stated:

...transport and urban design must be tackled together. It is important to manage urban design so that people do not become unnecessarily reliant on inefficient travel, with resulting energy consumption and emissions. Ideally, urban areas developed with less reliance on the motor vehicle would mean that residents may not need a car to go grocery shopping, children can walk or cycle to school and adults can walk, cycle or use public transport.

Submitter 21 summed up the importance of good transport and land use planning:

The built environment and transport systems are particularly important in terms of their impact on future energy sustainability and greenhouse gas emissions...wise management and planning can provide communities with ongoing resilience against future threats and uncertainties, such as energy resource depletion and associated price increases and volatility.

Submitters 87 and 112 both identified as very positive the reference to national policy statements in the Land Transport Management Act 2003. The 2008 amendment to the Act requires regional land transport programmes to take into account any relevant national policy statements prepared under the RMA. This was seen as:

A very welcome 'jumping of the boundary' from resource management to land transport management legislation, and as such provides an opportunity for integration to be achieved provided the urban design NPS is appropriately focused. (87)

Submitter 17 suggested one way to integrate land use and transport would be "embedding the Local Government Auckland Amendment Act nationwide".

Other submitters concentrated on the wider benefits of integrating transport and urban design, for example, the ability to contribute to other, related government policies and strategies. Examples given included health and energy:

An NPS on urban design must promote an integrated approach to urban design across relevant legislation. In particular we would like to see the link between urban design, transport and health emphasised and the contributions of the urban environment to health and social goals made clear. For instance, the promotion of active transport such as walking and cycling can significantly contribute to key government health strategies such as in Healthy Eating Healthy Action regarding the uptake of regular physical activity and reducing obesity, as well as government sustainability goals. (114)

The NPS on urban design could play a particularly significant role in giving effect to the New Zealand Energy Strategy's stated commitments to: develop resilient and low carbon transport; use energy more efficiently; support low emissions power, and foster greater affordability and wellbeing...the New Zealand Energy Efficiency and Conservation Strategy specifically describes how urban form and design are expected to contribute to sustainable energy outcomes. (21)

Two submitters stated the role of streets and roads was the main issue facing urban areas. They stated that the role of streets should be dealt with in an urban design NPS because this:

...would send a strong signal of the importance of effective and appropriate interfaces between urban design, planning and transport to improve urban outcomes. (44)

Submitter 6 stated urban design considerations should be inserted into transportation funding.

## 5.7 Transportation-related issues

Many submitters supported an NPS which addressed specific transportation-related issues, in addition to linking transport and land use planning as discussed in section 5.6. These included promoting:

- connectivity
- public transport
- walkability
- walking, cycling and other forms of active transport
- a balanced approach to parking.

The creation of cities which were easy for people to get around, allowed multi-purpose trips, did not rely unduly on the use of private motor cars and enabled more active forms of transport was seen as having several benefits. These included, for example, reducing carbon emissions and fuel use, improving air quality, improving the population's physical health, and promoting a sense of community.

## 5.8 Infrastructure

Several submitters suggested an NPS should address infrastructure issues other than transport. The main concern mentioned was encouraging sustainable water management as a means of easing urban growth pressures. For example, low-impact design or Water Sensitive Urban Design and Management (WSUDM) was promoted by submitter 46:

WSUDM will reduce the environmental impact of urban areas by reducing water consumption and minimising the adverse effects of stormwater on receiving environments.

Other issues suggested for inclusion in an NPS were:

- infrastructure design
- "...a balance is required between meeting infrastructure requirements and delivering good urban design..." (submitter 99)
- managing stormwater
- electricity and transmission corridors
- social infrastructure.

## 5.9 Liveability, quality of place

Many submitters referred to the 'people' aspect of urban design – issues of liveability, designing places for people, building communities, amenity, quality of place and other related concepts. For example, submitter 116 stated that:

...the priority for urban areas must be the people within them. Thus the NPS should emphasise safety, pedestrian friendly spaces and connections, built environments that enhance social interaction...

Submitter 63 stated “the significance of urban space in determining the quality of life of all people” was a matter of national significance that should be addressed in an NPS. Submitter 22 thought it was a national priority to address issues such as:

... creating places that are attractive to visitors and investors, creating better places to serve residents from all economic and social communities...

A small number of submitters discussed what quality urban design meant and suggested it could mean different things to different people. Submitter 3 concluded:

...what is not contestable is the qualitative outcomes and the needs and desires of people to live, work and play in a good urban environment.

Many submitters focused on ‘quality of place’ as an essential element which should be included in an NPS. For example, submitter 91 elaborated:

The emphasis on any NPS should be on the quality and design of place so it needs to reinforce that it is the qualitative elements of ‘how’ a place is designed that is most important, not rigid standards or numbers ... The quality of place, how an efficient place is created and the experience that people have in those places is paramount in urban design. The NPS needs to set up a robust framework for the measurement of this...

## 5.10 Quality of public spaces

As a specific issue about creating liveable urban areas (see section 5.9), several submitters highlighted the need for an NPS to focus mainly on the quality of public spaces. For example, submitter 24 supported an NPS that addressed “...the quality of the interaction between the public and private realm”. Submitter 49 summed up the reasons for supporting such an approach:

As noted in *The Value of Urban Design*, a high quality public realm does not arise by accident, but requires an integrated, all-encompassing approach to its design. The report also characterises as conclusive the evidence that urban design contributing to a high quality public realm attracts people and activity, leading to enhanced economic performance.

## 5.11 Māori values

A small number of submitters stated that Māori values should be explicitly provided for in an NPS. Submitter 40 suggested that the highest priority for an NPS “should be to provide for cultural values of Maori and Pakeha in an inclusive way”. Submitter 66 felt Māori, as Treaty of Waitangi partners, needed to be involved in developing an NPS for it to be an enduring document:

...introducing a Maori world view ... will add value and provide for an integrated, holistic and values based approach to the proposed national policy statement. (66)

Submitter 80 stated all matters in section 6 of the RMA should be reflected in an NPS to the extent that they concern urban design. They specifically referenced section 6(e) – the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, wāhi tapu and other taonga. Submitter 79 referred to section 6(e) and requested that its provisions be incorporated in an NPS, as well as the principles of the Treaty of Waitangi and

section 8 of the RMA. They further stated an NPS on urban design would be of assistance in achieving both section 6(e) and section 8 by involving a range of strategies, including:

The adoption of Maori values in the planning and design of urban environments. The adoption of Maori concepts and designs within contemporary urban designs for buildings and public space in collaboration with tangata whenua.

Two submitters (57 and 66) specifically mentioned concern over the lack of Māori participation in the development of the Urban Design Protocol:

...the whole Maori dimension has been left out and this missing part is the heart of what should be and could be addressed by a national policy statement. (57)

Submitter 66 also discussed the Te Aranga Maori Cultural Landscapes Strategy:

As the Te Aranga Maori Cultural Landscapes Strategy is a mandated document of national standing it should be accorded equivalent status to the proposed national policy statement.

## 5.12 Heritage

A small number of submitters considered historic heritage was a matter of national significance that should be addressed by an NPS. Some referred to its status as a matter of national importance in section 6(f) of the RMA and suggested this further validated its importance in an urban design NPS. Submitter 79 stated “historic heritage is a core component of urban design”. They referred to various provisions in the Urban Design Protocol which linked cultural identity, heritage, creativity and urban design.

Submitter 85 stated a matter of national significance was:

Architectural legacy, social and cultural heritage and the historic role of identified spaces and buildings should be preserved all over the country that will serve as character building for each city...

Submitter 79 referred to several principles for practical implementation of urban design and historic heritage. These are contained in the New Zealand Historic Places Trust publication *Sustainable Management of Historic Heritage Guidance Series Discussion Paper No. 4 Urban Design and Historic Heritage*.

## 5.13 Landscape

A small number of submitters stated the relationship between urban design, urban form and landscape should be included in an NPS. Reasons given included those set out in submission 49:

The design of urban development and redevelopment frequently ignores natural topography and drainage, resulting in excessive earthworks and adverse effects on freshwater catchments and the coastal environment. Urban sprawl ... has also significantly degraded natural and cultural landscapes and natural character in urban areas.

Submitter 25 stated landscape qualities were integral to New Zealand’s national identity, however:

...there are numerous examples of poor built insertions into this landscape, both at a settlement level and at an individual building level ... Often these significant landscapes are

in areas where small local authorities are under resourced and struggle to provide robust guidance as to the qualities of new development and how they should better integrate with the natural landscape.

## 5.14 Biodiversity

A number of submitters suggested protecting indigenous biodiversity should be given priority in an NPS on urban design. For example, submitter 8 referred to “bringing nature back into the city”. The reasons given for including biodiversity protection in an NPS were the significant negative impact of past developments, and the resulting loss of indigenous biodiversity. Submitter 7 stated:

An objective of urban design should be that all development initiatives have positive biodiversity outcomes ... Existing areas of biodiversity value need to be maintained and enhanced by urban design.

Submitter 49 explained how urban design could contribute to biodiversity protection:

Urban design can contribute to the protection or enhancement of indigenous habitat fragments in urban cores, larger fragments in peri-urban areas, and connecting corridors of green space.

## 5.15 Housing

A small number of submitters stated the provision of quality, affordable housing was a matter of national significance which should be dealt with by an NPS. For example, submitter 116 stated:

Housing is a core part of the urban landscape. This should be reflected in the NPS. Developing affordable, sustainable, healthy dwellings that provide a secure form of tenure... is a core part of the creation and maintenance of social capital.

Similarly, submitter 63 referred to housing:

The significance of supplying affordable, sustainable, good quality housing appropriate to individual needs in order to promote the well-being of a community.

This submitter elaborated on the links between urban design and housing:

Together, housing and urban design are fundamental to the establishment and maintenance of safe communities. Together, housing and urban design must look towards the future, understanding the future needs of a community as well as its present needs.

## 5.16 Retail location, role of town centres

Several submitters stated an NPS should deal specifically with retail location and the important role of town centres. Reasons given related to the importance of town centres in terms of being economic drivers for a community and providing an essential focus for community life. For example, submitter 25 stated:

Town and city centres are important as they have the potential to bring together a range of activities and people. They are the nucleus of communities. These centres are under threat through rationalisation, big-box retail, and a range of large scale out-of-centre development.

This puts the viability of centres under threat and greater challenges to the sustainability of communities.

Submitters 52 and 44 both stated the role of town centres was one of only two significant issues for urban areas an NPS should deal with. Submitter 52 stated:

Significant long term investment in physical and natural resources in New Zealand's town centres has been undermined by a narrow approach to the evaluation of adverse effects under the RMA, and an accompanying narrow focus on retail analysis and hierarchies, rather than the benefits and costs of development in town centres... There has been limited understanding of the key role of strong walkable town centres served by public transport, with public facilities and amenities being the base for economically and socially strong communities.

Submitter 82 was concerned large format retail had been identified as a potential threat to good urban design. They stated there was a need to:

...distinguish between stand alone large format retail which has urban design challenges and [certain] shopping centres which incorporate a significant degree of urban planning and design.

In a similar vein, submitter 27 could see nothing wrong with large format retail from an economic perspective:

Large format retail increases retail productivity and leads to higher employment growth, lower prices and higher wages in the retail sector.

## 5.17 Mixed use

A small number of submitters agreed an NPS should include provisions which encouraged mixed-use developments. Reasons given for promoting a mix of land use activities were that residents had less distance to travel to conduct their daily activities, with resulting benefits in terms of energy and transport efficiencies. Submitter 33 supported an NPS which would:

...encourage high-quality, compact mixed use neighbourhoods and town centres where uses are located closer together and a range of services, activities and transportation options are available and are accessible to all people.

Submitter 94 considered mixed-use development should be dealt with in an NPS, but from the perspective of protecting residents from the adverse impacts of non-residential activities. This submitter also advocated for a mixed environment, with a wide range of community and cultural facilities – not just bars and restaurants.

On a related issue, submitter 22 suggested matters of national significance which should be dealt with by an NPS included “redevelopment of waterfront areas experiencing land use transition from industrial uses”.

## 5.18 Natural hazards

A few submitters stated natural hazard management should be part of an NPS on urban design. For example, submitter 7 stated:

Urban design should seek to minimise natural hazards by avoiding development in hazard prone areas such as flood plains, coastal edges and steep land.

Submitter 113 considered it was “essential for good urban planning to take into consideration risks from natural and technological hazards to our cities”. This submitter also considered the concepts of risk and resilience should be built into an NPS.

Submitter 36 stated new, pressing issues for New Zealand included “the need to adapt urban form to the direct and indirect consequences of climate change”. Included in the direct effects were extreme natural events such as storms, flooding and landslips.

## 5.19 Access to open space

A small number of submitters considered access to open spaces within an urban environment was a critical urban design issue that should be dealt with in an NPS. Submitter 36 summed up the reasons:

There is increasing evidence of the positive correlation between access to green space and improved physical and mental health of communities.

## 5.20 Protection of soils

Some submitters considered an NPS should include a specific provision protecting versatile soils for food production. For example, submitter 59 stated:

A responsible national policy statement regarding urban design must consider the living standards of future generations. To this end, it would be prudent to re-introduce the protection of versatile soils, establish urban boundaries, with a view to not just protect our ability to produce food, but produce it relatively cheaply so that people can afford it.

## 5.21 Rural–residential development

A small number of submitters stated an NPS should address rural–residential or other developments on the urban periphery. Submitter 7 stated:

In terms of many regionally important matters, rural residential development is having more significant effects than urban development.

## 5.22 Safe environments

A few submitters stated that a priority area should be the creation of safe urban environments. Submitter 94 encapsulated a definition of a safe environment:

Safe from accidental injury ... safe from environmental harm ... safe from physical threat, intimidation and violence, and damage to or theft of property, safe for our vulnerable populations such as women, children and elderly.

Specific reference was also made to inclusion of the Crime Prevention Through Environmental Design (CPTED) principles in an NPS. Submitter 11 stated reasons for this:

An integrated approach to urban design and crime prevention will enhance the physical amenity of our urban areas, as well as their sustainability as vibrant communities.

## 5.23 Accessible neighbourhoods

A small number of submitters stated an NPS on urban design should address the creation of accessible neighbourhoods as a matter of national significance. An accessible environment was seen as one that took into account the needs of all people, including those with disabilities. Submitter 98 stated:

Urban areas that work well for older people and people with disabilities will work well for all. We therefore recommend that any national policy statement on urban design give national strategic importance to the needs of these groups.

Submitter 33 stated many New Zealanders considered themselves to have a disability, and the population was increasingly ageing:

Given the large portion of the New Zealand population affected by this issue, it is important to recognise that access and mobility in our built environment is a matter of national significance. As such it should be provided for in any NPS on urban design.

Submitter 26 stated New Zealand would soon ratify the United Nations Convention on the Rights of Persons with Disabilities. This convention includes a requirement that appropriate action is taken to ensure increased accessibility for disabled persons:

An NPS on urban design should reflect this by acknowledging that accessibility, mobility and usability are issues of national significance.

## 5.24 Link to physical health

A few submitters stated an NPS should make a strong connection between urban design and physical health:

We believe it [an NPS] should clearly show the significant impact of urban environments on people's health and wellbeing...There is now a large body of evidence that shows that the settings in which people live, work and play, have a huge influence on health and wellbeing throughout the life span. (114)

## 5.25 Environmental issues

A small number of submitters stated an NPS on urban design should deal with environmental issues such as:

- discharges to air
- discharges to water
- surface water quality
- water use
- waste management and recycling.

## 5.26 Solar access

Some submitters agreed an NPS should encourage solar access for buildings, or other 'green building' attributes.

## 5.27 Protection of the night-time environment

A small group of submitters stated that protecting the night-time environment should be in an NPS. For example, submitter 45 stated:

...protection of the values of the night environment be an essential part of a national policy statement on urban design. Specifically guidelines should be included that encourage efficient and effective outdoor lighting techniques that prevent unwanted effects from that lighting.

## 6 Issues an NPS should not address

Many submitters specified issues they considered an NPS should not address. These included:

- global or big-picture issues of national priority
- growth management
- urban planning
- detailed design.

### 6.1 Global and big picture issues

A small number of submitters stated an NPS on urban design should not address various global or big-picture issues. These included:

- energy policy
- economic development
- climate change
- vehicle emissions
- sustainable transport.

The reasons given included that these were not urban design issues and/or would better addressed through other means. Submitter 113 provided further detail as to why climate change and vehicle emissions in particular should not be dealt with:

...we are not convinced that setting up national strategic priorities, such as climate change adaptations or vehicle emissions would be best addressed through this policy statement. With the recommendation that the urban design policy statement be succinct and focused on providing high level principles in mind, and considering the raft of supporting instruments that the government is providing to address the issues of climate change adaptations and vehicle emissions, it might be more appropriate to defer those and remain focused on the principles of good urban design.

### 6.2 Growth management

A few submitters stated growth management issues should not form part of an NPS. For example, submitter 5 stated:

...the NPS should not focus on growth management. Whilst urban design and growth management can influence each other and can be closely related, growth management is a separate issue that should not cloud an NPS on urban design.

Submitter 119 considered urban growth was driven by many factors, not just urban design:

While urban design plays an important role in growth management there are other significant drivers that determine growth and intensification. These include but not limited to geography and topography, coastal management, transport investment, stormwater/wastewater requirements, population requirements, economic requirements, metropolitan urban limits, regional and district plans ... growth and investment is very

context sensitive and there is a danger in having an NPS that is too prescriptive implicating other key aspects and considerations which drive growth.

Submitter 22 considered regional growth management, policy planning, large area land use planning, and urban boundaries were most properly addressed by land use planning or high-level policy initiatives.

Submitter 100 stated the appropriate tool to manage urban sprawl was through transport pricing mechanisms.

## 6.3 Urban planning

Submitter 88 considered urban planning (specifically urban growth, resource management and planning matters) would be better addressed through means other than an NPS. They stated:

It is difficult because of the nature of urban design to exclude such matters but there becomes a very uneasy pattern of how wide the scope should be for urban design. The difficulty lies in identifying what is considered urban design and what is planning. There are of course links, such as between land use and transport, urban form and structure, but the essence of urban design is about spaces, places and how people use them rather than the extent of planning matters. The location of new settlements is considered a planning matter while the form of the settlement might be considered a design matter for example.

## 6.4 Detailed design

Many submitters stated an NPS should not deal with detailed design issues, particularly those of an architectural nature. Submitter 13 recommended an NPS should exclude:

Details of colour, window widths etc, i.e. the details of building design (but the principles about them being built to be energy efficient, human scale etc should be included).

Similarly, submitter 47:

The NPS should not go to the level of architectural detail – that is, it should not constrain the architecture, but it should make clear that urban design provides a framework within which architecture should work, from built form scale and massing to environmental responses to amenity issues.

Submitter 97 considered:

The NPS should not contain technical design recommendations or requirements. These would be better included in the appropriate design manuals and standards.

Submitter 82 stated an NPS:

...should not be prescriptive as far as the architectural design of building structures are concerned ... urban design is highly context specific. It is therefore important for urban design initiatives to be developed at the local level as appropriate.

Others agreed detailed design was best dealt with at the local level. For example, submitter 39 indicated they would be concerned:

...if a national policy statement directed specific ways in which development should be controlled at a regional or local scale to achieve specific urban design outcomes...

Submitter 21 agreed, saying:

...it would not appear wise to usurp local decision making and necessary policy tradeoffs based on local conditions.

## **6.5 Other**

Other issues mentioned specifically as not being suitable for inclusion in an NPS on urban design included:

- social services
- green buildings
- rural environments or non-urban development
- decision making on competing land uses.

# 7 Scale

Most submitters concurred with the background paper that urban design covered a range of spatial scales. Many submitters felt an NPS should apply from the largest scale (regional) through to the smallest (individual building). However, a few submitters did not agree with this approach, and their alternative suggestions are discussed below. Whether an NPS should apply to rural settlements was also an issue several submitters raised.

## 7.1 All scales

Most submitters thought an NPS should cover all spatial scales, in descending order: regions, metropolitan areas, cities, towns, neighbourhoods, individual spaces, and finally buildings. The reasons given were that urban design applied to all these spatial scales, therefore an NPS on this topic should address the full range. Many referred back to the definition of urban design in the Urban Design Protocol which specifically mentions all of these scales.

Submitters 60, 92 and 107 stated:

Successful urban planning and design follows good process and should be specific to the different spatial scales. This is from the sub-regional framework or metropolitan and town scale through to neighbourhood and site planning and building design. All these scales should be reflected within the national policy statement.

Most comments about spatial scale were at a general level. However, a few submitters specified what issues they considered should be dealt with at what scales. Submitter 49 identified:

Connectivity (particularly for public transport), density, integration of decision-making, public participation are urban design elements relevant at a **regional** scale. Design issues relevant to the protection and enhancement of biodiversity (e.g. rural-urban green corridors) and to the management of effects on freshwater catchments also have **regional** dimensions. Design for local character, mixed use, adaptability, and the quality of the public realm must occur at **metropolitan, city, town, neighbourhood, precinct, street and individual building** scales.

Submitters 60, 92 and 107 included an extensive list of issues they thought should be tackled at specific scales.

Submitter 63 considered transport issues should be dealt with at the regional level; accessibility, amenity and aesthetics at the city/town scale; community needs at the neighbourhood level; and liveability of common spaces at the individual space and building scale.

In addition to all these scales mentioned, submitter 111 considered it may be appropriate for an NPS to signal how the sustainability benefits of urban design contributed at a global level.

## 7.2 Specific scales

A few submitters did not support an NPS which applied to all spatial scales.

Submitters 7 and 68 stated an NPS was most justified at the largest spatial scales, and least justified at smaller spatial scales. Submitter 34 agreed, stating an NPS should not go below the

regional level. That is, it should not apply to cities, towns or neighbourhoods. Submitter 87 mentioned a regional level would be best if the focus was on transport and land use planning. Conversely, submitter 88 stated specifically that an NPS should *not* apply at the regional level, only at the metropolitan, provincial and settlement scale.

Submitter 75 considered that an NPS should apply at the regional and city/town level only. Submitter 16 suggested three scales – village and town, smaller cities, and larger cities – with different guidance relating to each level. The subdivision, town or city level was supported by submitter 46, with specific emphasis on green-field and larger brown-field development.

Submitter 2 suggested:

It would be more difficult to apply the NPS at the neighbourhood level, as communities are diverse and have different needs.

A small number of submitters specifically mentioned it was appropriate for an NPS to apply to individual buildings.

## 7.3 Rural settlements

A few submitters mentioned that an NPS should acknowledge and address rural settlements. Reasons included:

...all built environments, including rural, are designed and should be designed well' (47)

Urban design principles are also relevant to the appropriate design of new buildings and developments in the rural area. (79)

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 structures in the landscape. (43)

However, one submitter specifically mentioned an NPS should not apply to the rural area because they did not:

...believe that the NPS should encapsulate rural, semi-rural or peri-urban environments, as urban environments have different issues to these areas ... We believe that these other environments are best managed under the Regional and District Plans as currently exists. (84)

## 8 Implementation and capacity issues

Many submitters raised concerns about how an NPS would be implemented and if there was the collective capacity to do this successfully. Issues discussed included:

- the impact of an NPS on councils, particularly small ones
- the cost of implementation for all those involved in urban design
- how to develop and maintain appropriate urban design skills in New Zealand
- the role of professional organisations in implementing an NPS
- the role of the Ministry for the Environment in supporting councils with implementation
- monitoring and evaluating the success of a NPS.

### 8.1 Smaller councils

Many submitters felt an NPS would create significant resourcing issues for small councils. Where submitters were specific, they mentioned costs, time and the people resource involved. First, in making the necessary changes to district and regional plans and, second, in assessing the perceived increase in resource consents that would result.

Submitters felt resourcing issues could have a major impact on the acceptance, uptake and successful implementation of an NPS:

...as many councils are small and have very limited funding, the NPS should not make it more difficult for councils to carry out their functions. If anything the NPS should assist councils in carrying out their functions, by making it easier for them to prepare effective policy documents. (16)

Less well resourced councils may struggle more to achieve quality urban design but these councils may also derive the most benefit from quality urban design. Giving councils an additional burden without support is, I imagine, unlikely to lead to quality urban design outcomes. (23)

Along similar lines, submitter 89 suggested:

...an NPS could end up making very little difference to overall urban development outcomes for larger urban councils that are already making appropriate changes to their district plans and being quite a costly exercise for smaller councils with very small urban centres and very little urban development.

A few submitters made the link between lack of local authority resources in urban design and the need for developing, attracting and retaining urban designers (discussed in section 8.3). For example, submitter 3 stated:

An NPS must avoid placing an obligation (or encouraging) every TA [territorial authority] to gear up with an urban design team. We just do not have the skilled people...

Submitter 108, who did not support the introduction of an NPS, stated any NPS would:

...create an unnecessary burden on smaller councils who may have alternative community based pathways to working towards better urban outcomes.

A small number of submitters also mentioned the costs and benefits of an NPS would need to be carefully evaluated. For example, submitter 39 stated:

The cost of implementing a national policy statement can be significant for both councils and communities. The Ministry for the Environment must ensure that the benefits gained from implementing any proposed policy statement clearly outweigh the costs of developing and implementing it.

Many submitters stated that an NPS would need to be supplemented by a package of resources to assist local authorities in implementing it.

Submitter 79 encapsulated many submissions by saying:

AN NPS on urban design should be accompanied by a support package to assist those local authorities who have limited resources.

Submitter 49 (who is **not** a local government submitter) suggested:

An indication of the implementation support that might be available for local authorities is likely to influence the local government response to the policy itself.

The NPS should outline funding responsibilities and provide avenues where funding may be received. (23)

Submitter 26 cautioned:

Rather than avoiding approaches that create resourcing issues for smaller councils, an NPS should provide guidance on how resourcing issues may be addressed through regional cooperation and other strategies.

Submitter 24 suggested a “no cost” to councils alternative to an NPS:

...developing a national environmental standard that requires certain types of developments to obtain resource consent, subject to assessment of urban design issues...This type of approach would mean that district plans do not need to be changed...

## 8.2 Costs of implementation

In addition to the costs of implementation for small councils, several submitters talked about the costs of implementation for other parties involved in urban design.

Submitter 65 cautioned:

Many developers are likely to see a further layer of uncertainty inserted into district plans if only general statements are made within the NPS.

While submitter 96 suggested: “A high level policy ... would be an unnecessary burden of cost and time to regulatory authorities and plan applicants”, submitter 32 was concerned about the impact on developers if an NPS resulted in further regulation. In particular, they considered:

...the only legitimate way that urban design objectives and policies can be incorporated into plans with teeth will be through resource consents. This imposes a considerable cost on development.

In a similar vein, submitter 17 was concerned about the inherent conflicts between costs and time on one hand, and quality on the other:

Promoting better design involves giving greater consideration to design matters and a new level of performance from consent applicants, which often involves the application of discretion ... This can result ... in an increase in costs and time taken for consent processing.

Conversely, submitter 25 believed an NPS would reduce costs to local authorities, developers and communities. Specifically, the submitter referred to:

...lower policy development costs, lower guideline development cost, faster resource consent applications, greater certainty and lower risk for all.

### **8.3 Developing, attracting and retaining skills**

Many submitters mentioned the need for developing and maintaining knowledgeable people in the urban design field, particularly to assist local authorities. At least one local authority noted it was having difficulty in recruiting a qualified and experienced urban designer. Another stated an NPS:

...must be supported by sufficient central government support to develop (and attract and retain) the skill base needed in New Zealand to deliver it. (17)

This was a sentiment also expressed by submitter 63:

An NPS on urban design should establish the importance of developing and maintaining knowledgeable people/groups that are able to advise and assess what is appropriate. It is important that every local planning authority has urban design expertise available to them.

A small number of submitters referred to the 2006 Ministry for the Environment survey of urban design skills within local authorities which highlighted the variable urban design capacity of councils. Submitter 25 warned: "...careful consideration should be given [to this] when drafting the content of the NPS".

Submitter 111 suggested an NPS could:

...also signal to the tertiary institutions that there is a need to improve professional urban design skills and knowledge through education of future planners, designers and decision-makers.

Submitter 64 was concerned about perceived inadequacies in the tertiary education system because it tended to reinforce the 'silo' mentality of the various professions involved in urban design. Instead, they proposed:

...all students involved in designing the urban environment must undertake a year of undergraduate study on 'urbanism' or general urban studies that covers a broad aspect of architecture, landscape, planning, engineering and property theory and practice before entering into specialisation ... This will ensure future professionals will have more balanced and integrated views of the urban environment.

## 8.4 Role of professional organisations

Two submitters commented on the role of professional organisations in implementing an NPS. Interestingly, neither submission was from a professional body.

One submitter (68) stated the NPS might broadly signal “the place of organisational, professional and sector actions relevant to good urban design”.

Another considered:

...it is essential that the Government lead a concerted effort to regulate and strengthen the urban design profession in New Zealand. A professional body needs to be established that will be the focus for education, research and professional standards in the industry ... Any NPS or other statutory mechanism will only be as strong as the body of professionals that use and police it, so efforts to develop this further are needed alongside the creation of an NPS. (91)

This particular submitter mentioned a professional urban design body in South Africa as a good example of strengthening the capacity of professionals in the urban design field.

## 8.5 Role of the Ministry for the Environment in implementing an NPS

Submitter 52 considered:

While the Ministry has provided a useful information base on some urban design matters, it would need more effective involvement in key RMA processes, or some early pilots, e.g. through district plan reviews, to support sound urban design outcomes.

This submitter questioned the level of involvement of the Ministry and other government agencies in plan change 6 to the Auckland Regional Policy Statement, which included specific urban design objectives and policies.

## 8.6 Monitoring

One submitter (49) suggested the NPS should also include measures for monitoring and the benefits of this would go beyond simply monitoring the effectiveness of the policy:

Indicators or other monitoring initiatives would underpin further development of policy in the longer term and could begin to remedy the shortage of urban design research in New Zealand.

## 9 Other initiatives

Many submitters suggested initiatives which could be applied either instead of, or in addition to, an NPS. There was a high degree of support for the existing Urban Design Protocol resources. Additional initiatives suggested included:

- other RMA-based changes, such as amendments to Part 2 of the Act and the use of national environmental standards
- sharing best practice case studies on urban design
- promoting the use of particular urban design tools, such as structure plans
- encouraging urban design review at the local and national level
- investigating urban development agencies.

### 9.1 Support for the Urban Design Protocol

Most submitters supported the Urban Design Protocol and suite of resources the Ministry for the Environment has developed to support the protocol's implementation. Most wanted to see this work continued or expanded regardless of whether an NPS eventuated. Many submitters believed the seven Cs (urban design principles) in the protocol were useful and were contributing to providing national guidance on making towns and cities more successful through quality urban design.

Submitter 108 stated:

We feel the MfE has made significant progress and delivered very positive outcomes nationwide through its work on the Urban Design Protocol, and general capacity building of urban design skills and understanding.

Similarly, submitter 89 recognised:

...the excellent work of the Ministry both through the Urban Design Protocol work and the preparation of other guidance and case studies.

Submitter 39 stated the main barriers to quality urban design outcomes in New Zealand were a lack of education about what urban design entailed and its value, and a lack of skilled council staff and developers. In particular, they considered:

...successful implementation of the New Zealand Urban Design Protocol is the most effective way in which to provide national guidance to address these barriers.

Submitter 87 sought to maintain a distinction between the role of the Urban Design Protocol and that of an NPS and suggested, although they were mutually complementary, their roles were quite different:

...the Protocol should retain its present very broad, all-embracing focus, in keeping with its aim of encouraging learning and a greater understanding of what constitutes best practice urban design... The non-statutory basis of the Protocol is its great advantage in this, because it enables new ideas to be 'floated', discussed, and views on those ideas to be exchanged.

Submitter 6 suggested an NPS should actually require nationwide participation in the Urban Design Protocol.

A small number of submitters also considered it would be better to focus scarce central government resources on the non-statutory approach embodied in the protocol, rather than an NPS. (This is discussed in further detail in sections 3.1 and 3.2.) For example, submitter 95 stated:

The Ministry for the Environment has already identified a wide range of urban design qualities in its various publications and the use of these should be encouraged rather than replaced by an NPS.

## 9.2 Include urban design in Part 2 of the RMA

Several submitters suggested Part 2 of the RMA should be amended to better reflect the importance of urban design and its role in promoting the sustainable management of natural and physical resources. Most suggestions were for urban design to be included either as a matter of national importance in section 6, or in section 7 as a matter to which particular regard must be had.

Submitter 44 questioned the purpose of an NPS. In particular, they observed if the key concern was statutory recognition of urban design:

...then including urban design in the Act itself as a section 6 matter of national importance, would provide stronger statutory recognition of urban design.

Similarly, submitter 52 considered:

...recognition of urban design within the Act itself, rather than a statutory instrument under the Act, would more appropriately recognise the importance of urban design. It would also make it clear that the Act is not just a natural resources act, but that it is explicitly relevant to New Zealand's urban areas.

Submitter 24 suggested adding a new section to the RMA along the lines of section 8, where the importance of a locally developed statement of urban design principles was required to be taken into account:

In achieving the purpose of this Act, all persons exercising functions and powers under it, in relation to managing the use, development, and protection of natural and physical resources, shall take into account the urban design principles set out in a locally prepared and agreed spatial framework/strategy.

## 9.3 National environmental standards

Submitter 24 advocated a “switch from a policy-led approach to a consent-trigger approach”. They suggested, instead of an NPS, a national environmental standard be developed which required certain types of developments (for example, multi-unit residential and large commercial developments) to obtain a resource consent, subject to an urban design assessment.

Submitter 112 also proposed a national environmental standard. They considered that a national environmental standard on “containing metropolitan expansion of urban areas on to rural land” should be explored.

## 9.4 Best practice

Many submitters suggested the promotion of best practice in urban design in New Zealand would be a helpful initiative, regardless of whether or not an NPS was developed. Many submitters acknowledged the work of the Ministry for the Environment in sourcing and publicising case studies, and other examples of best practice. Submitters stated many of those involved in implementing urban design would benefit from best practice promotion. In particular, it was important for case studies or examples of best practice to consider the views of local government, developers and professionals, such as architects and planners.

A few submitters considered a web-based database of urban design resources and outcomes would be helpful and could go part way to addressing the shortage of urban design skills in New Zealand. Others advocated for further general information on urban design (including what it is and its benefits and values), tailored to targeted audiences (for example, developers, councillors, architects, builders and members of the public).

At least one submitter mentioned the possibility of developing further quality planning guidance notes on particular issues (for example, integrating transport and land use planning, energy benefits and urban design). Submitter 23 thought best practice guidelines would assist in defining the roles of different levels of government:

The development of best practice guidelines to complement the NPS may assist councils understanding their responsibilities and knowing how to implement these. This might be beneficial if there are different expectations of different bodies, for instance a regional council may be expected to contribute to urban design in a different way to that of a territorial authority. Best practice guidelines and examples may help these bodies to start to implement urban design projects as well as to get the thinking about other ways they might do this.

A small number of submitters thought specific parties had an important role to play in best practice promotion:

Major landowners and developers should demonstrate best practice in urban design and through their developments influence and educate the public. (63)

Central government agencies need to take more leadership in their own developments. (89)

## 9.5 Urban design tools

Several specific urban design tools were suggested by submitters to promote and/or mandate improved urban design outcomes. Examples included:

- structure plans
- mandatory design assessments with all resource consent applications
- town centre strategies
- mainstreet programmes
- infrastructure management plans
- urban design strategies
- master plans
- design guidelines

- assessment criteria
- regional growth strategies
- social impact assessments for all large developments
- health impact assessments
- three-dimensional modelling (to demonstrate anticipated policy outcomes in district plans and for significant projects)
- pilot projects
- building typologies
- strategic planning.

## 9.6 Design review

A few submitters were supportive of the use of design review at both the local and national level. Of these, a number had had positive experiences of participating in or with one of the existing urban design panels, and many wanted to see this practice extended. Design panels were viewed as a collaborative approach, with councils working with the development community to enable good design outcomes:

Territorial authorities are increasingly using urban design panels as a means of informing and advancing design outcomes that reflect the ... Urban Design Protocol. (55)

Submitters saw central government assistance in setting up design panels and/or providing a design review service as part of a package which could assist small councils. For example, submitter 24 suggested a government-funded service along the lines of the United Kingdom's Commission for Architecture and the Built Environment (CABE):

Add to this some form of assistance from central government for smaller councils to assess bigger applications, then the path of implementation may be easier. In this regard I note that CABE in England runs a design review service. Could a similar service be offered to councils on a subsidised basis?

Submitter 79 suggested urban design panels should also include heritage expertise because panels often dealt with heritage-related proposals.

## 9.7 Urban development agencies

Three submitters suggested further investigation and encouragement of the development agency model used extensively overseas. They noted there are several barriers to establishing development agencies in New Zealand, but that this kind of tool was necessary for dealing with large-scale urban change, especially in existing urban areas and where there was multiple land ownership. Submitter 3 suggested there were advantages in having such agencies because they were independent of the political cycle:

... the best examples of urban design outcomes have been achieved through the governing bodies setting up urban design (or development) agencies to work independently of the cyclical political process ... They can enable urban design professionals to respond to local conditions ... they will create a dynamic process that involves people at a 'grass roots' level...

Submitter 96 said “central government might explore the possibility of establishing jointly funded urban development agencies to implement integrated urban regeneration programmes”. In the submitter’s view, this kind of government assistance would better support councils because “it is in the area of implementation, rather than policy, that councils are struggling with in achieving good urban design”.

A few submitters noted the establishment of urban development agencies was one of the options identified in the Department of Internal Affairs’ discussion document *Building Sustainable Urban Communities*.

## 9.8 Developer-based initiatives

A small number of submitters thought developer-driven initiatives, or those aimed specifically at the development community, would have an immediate impact on urban design outcomes. Some mentioned this approach would be of benefit if it was a collaborative one between councils and developers. For example:

...TLAs [territorial local authorities] to take more leadership in establishing the institutional framework for development, with which private developers are provided with opportunity and a requirement to deliver a much higher standard of design performance. (36)

Two submitters (55 and 83) suggested an urban design rating system which could be used to evaluate projects in terms of urban design. Submitter 55 envisaged a tool developed by the local government sector and property industry along the lines of the green star rating tool developed by the New Zealand Green Building Council:

...an industry guide which would inform best practice thinking in relation to the design of products within the built environment. An industry guide would be a useful tool in assessing how a development project adds to the functionality of the urban environment from a design perspective.

Other incentive-based initiatives suggested included more streamlined consent processing for those who undertook good design (88), and central government grants to offset development contributions for developments that exceeded specified urban design principles (submitter 83).

## 9.9 Guidelines

Many submitters suggested there was a role for non-statutory guidelines, either as an alternative to an NPS or as a separate, more technical document (assuming a high-level principles-based NPS was put in place). These guidelines would take an outcomes approach and represent best practice, or, alternatively, as suggested by one submitter “a minimum urban design approach” (submitter 103).

Submitter 74 recommended that these guidelines could include:

...a range of guidelines for building types, that could either be sourced by local councils as appropriate, or used as templates for their own documents.

Submitters also suggested that guidelines on how to incorporate urban design principles, standards and so on into district plans would be at least as useful as a national policy statement.

Specific topics for other guidelines included streetscape issues and integrating infrastructure with land use.

## 9.10 Alternative models

Many submitters referred to alternative approaches to improving the quality of urban design. Several referred to the United Kingdom's Planning Policy Statement 1 (PPS1) – Delivering Sustainable Development, or its predecessor PPG1, as a useful model that could be adopted in New Zealand. A few indicated they preferred the more broad-based approach to urban development issues being taken by the Department of Internal Affairs in its *Building Sustainable Urban Communities* discussion document.

A number of submitters suggested using the principles contained in other relevant urban design related documents as a basis for developing an NPS. These included:

- *People+Places+Spaces* developed by the Ministry for the Environment
- the core elements set out in the Ministry for the Environment's *The Value of Urban Design*
- the Commission for Architecture and Built Environment's *By Design – Urban design in the planning system*
- the Congress for the New Urbanism's principles.

## 9.11 Other initiatives

Other initiatives mentioned included:

- establishing a New Zealand equivalent of the Commission for Architecture and the Built Environment
- spelling out the role of the different parties involved in implementing urban design
- professional development opportunities and further training (discussed in section 8.3 in further detail)
- councillor training
- a national certification programme
- a national urban design awards scheme
- supporting urban design research and evaluation
- developing an independent Urban Design Act on the same level as the RMA.

# Appendix A: Questions posed in background paper

1. 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?
2. If an NPS on urban design were to be prepared, how would you see it being structured, what level of detail would it contain and how directive would it be?
3. What should not be covered by an NPS on urban design?
4. At what scale or scales would it be appropriate for an NPS on urban design to provide direction?
5. What additional qualities do you consider should be reflected in an NPS on urban design?

## Appendix B: List of submitters

Submitter number	Organisation
1	Invercargill City Council
2	Auckland University of Technology
3	Architectus Auckland
4	Matamata Piako District Council
5	CHEAL Consultants
6	Individual
7	Environment Waikato
8	University of Waikato
9	Terra Nova Planning
10	Tourism Industry Association New Zealand
11	Ministry of Justice
12	Individual
13	Individual
14	GNS Science
15	Waimakariri District Council
16	Planning consultant
17	Franklin District Council
18	Whakatane District Council
19	Individual
20	Thames Coromandel District Council
21	Energy Efficiency and Conservation Authority
22	Whangarei District Council
23	Ministry of Youth Development
24	Hill Young Cooper Ltd
25	Wellington City Council
26	Office for Disability Issues
27	Centre for Resource Management Studies
28	Hewson Planning Ltd
29	Individual
30	Individual
31	Individual
32	Tauranga City Council
33	Barrier Free New Zealand Trust
34	Rotorua District Council
35	Manukau City Council
36	Lincoln University
37	Wairoa District Council
38	Environment Bay of Plenty

Submitter number	Organisation
39	Greater Wellington Regional Council
40	Ngaiterangi Iwi Inc Society/Te Runanga o Ngaiterangi
41	Papakura District Council
42	Hopper Developments Ltd
43	New Zealand Institute of Architects Inc
44	Planning consultant
45	Royal Astronomical Society of New Zealand
46	Metrowater
47	Beca Carter Hollings & Ferner Ltd
48	New Zealand Institute of Architects – Auckland Branch
49	Department of Conservation
50	North Shore City Council
51	Boffa Miskell Ltd
52	Forum for Auckland Sustainable Transport
53	Ichythus Consultancy Ltd
54	Individual
55	Property Council of New Zealand
56	Hamilton City Council
57	Scott Design Ltd
58	Transurban Ltd
59	Individual
60	Christchurch City Council
61	Context Urban Design Ltd
62	Watercare Services Ltd
63	Housing New Zealand Corporation
64	Thresher Associates
65	Urban Design Forum New Zealand
66	National Steering Committee – Te Aranga Maori Cultural Landscape Strategy
67	New Zealand Fire Service
68	Tasman District Council
69	Individual
70	Urbanismplus Ltd
71	Office of Ethnic Affairs
72	Accident Compensation Corporation
73	Resource Management Law Association of New Zealand Inc
74	Individual
75	Cardno TCB
76	Stephenson & Turner Ltd
77	Duffill Watts Consulting Group
78	Individual
79	New Zealand Historic Places Trust

Submitter number	Organisation
80	Ministry for Culture and Heritage
81	Isthmus Group Ltd
82	Westfield New Zealand Ltd
83	New Zealand Green Building Council
84	Connell Wagner Ltd
85	Individual
86	Individual
87	Boulter Consulting
88	Harrison Grierson Consultants Ltd
89	Local Government New Zealand
90	Otago Regional Council
91	Common Ground Studio
92	Greater Christchurch Urban Development Strategy Partnership
93	Rodney District Council
94	Bay of Plenty District Health Board
95	Landlink Ltd
96	New Zealand Planning Institute
97	Traffic Design Group
98	Age Concern New Zealand
99	Telecom New Zealand Ltd
100	Institution of Professional Engineers New Zealand
101	Waitakere City Council
102	Taupo District Council
103	Individual
104	Auckland Regional Council
105	Auckland City Council
106	Individual
107	Environment Canterbury
108	Nelson City Council
109	Ministry of Health
110	Beacon Pathway Ltd
111	Waitakere City Council
112	New Zealand Transport Agency and Ministry of Transport
113	Ministry of Civil Defence and Emergency Management
114	Regional Public Health
115	Individual
116	Royal Society of New Zealand
117	Department of Building and Housing
118	New Zealand Institute of Surveyors
119	Auckland Regional Transport Authority
120	AMP Capital Investors