

Tim Davin  
Director – Policy  
PO Box 12 241  
Wellington  
dir-pp@ipenz.org.nz  
[www.ipenz.org.nz](http://www.ipenz.org.nz)

# SCOPE OF PROPOSED NATIONAL POLICY STATEMENT ON URBAN DESIGN

**SUBMISSION TO THE MINISTRY FOR THE ENVIRONMENT  
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## **BACKGROUND TO IPENZ**

The Institution of Professional Engineers New Zealand (IPENZ) is the lead national professional body representing the engineering profession in New Zealand. It has approximately 10,000 Members, including a cross-section from engineering students to practicing engineers to senior Members in positions of responsibility in business. IPENZ is non-aligned and seeks to contribute to the community in matters of national interest giving a learned view on important issues, independent of any commercial interest.

## **EXECUTIVE SUMMARY**

There are a number of influences on the built form of our cities and towns. IPENZ supports the development of a National Policy Statement (NPS) for urban design, however it must be noted that an NPS has limitations and cannot manage all aspects of urban design. We consider that the most influential impact that an NPS can have is on the nationally significant issues of connections (transport) and the collaboration of the relevant decision makers. The NPS should deal with the issues of transport, growth management and the built environment.

IPENZ supports the NPS being a national document to deal with national/regional and inter-regional issues. We would support the NPS being brief and providing high-level principles, objectives and policies.

The NPS needs to support an integrated and complementary approach to urban design across all the relevant legislation.

## **SUBMISSION**

**Question 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?**

### **Limitations of an NPS**

An NPS is a statutory mechanism to promote good urban design, and hence can be problematic – ie can good design be legislated for? The Urban Design Protocol and the case studies promoted best practice in urban design and will an NPS add further value?

There are many influences on the built form of our cities and towns:

- demographics
- community socio economic circumstances
- business and retailing trends
- economic growth and agglomeration
- changing demands and preferences for housing in its various forms
- fuel prices/tolling/road pricing
- technology developments in society and in transport (ITS)
- promotion of transport mode shifts.

The Urban Design Protocol identifies seven essential design qualities that create quality urban design – context, character, choice, connections, creativity, custodianship and collaboration. While an NPS can contribute to context (spatial dimensions and relationships), character, and choice, it can have little influence on creativity and custodianship. It is the view of IPENZ that the most influential impact that an NPS can have is on the nationally significant issues of connections (transport) and the collaboration of the relevant decision makers.

Therefore, 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.

### **Land use and transport**

What are the current tools to manage connections (transport)?

The Local Government Auckland (Amendment) Act 2004 mandated all territorial authorities in the Auckland region to integrate their land transport and land use provisions and to ensure these are consistent with the Regional Growth Strategy.

At the national level, the only reference to land use and transport is in the 2005 amendment to the Resource Management Act 1991. This amendment incorporated, under Section 30 - Functions of regional councils, sub-section (1) (gb) that the functions or regional councils include “the strategic integration of infrastructure with land use through objectives, policies, and methods”. These provisions are relatively weak in our view.

A major purpose of the Land Transport Management Act 2003 is to ensure that a region is collectively planned and that transport serves land use needs, but the land use purpose is not supported by further provisions in that Act.

It is the view of IPENZ that transport planning 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.

Similarly, the zoning, landscaping and land use controls adjacent to major transport facilities should be considered when designations for new routes or improved routes are being considered. Transport strategies make little sense without an urban development strategy and vice versa.

### **Growth management and urban intensification**

There are significant questions about whether managing growth to encourage urban intensification is desirable, and if so, whether current regulatory mechanisms are sufficient to reduce urban sprawl and promote intensification of development, particularly around transport nodes. Planning mechanisms largely manage effects rather than control activities. There are also arguments about the appropriate tools to manage urban sprawl – should it be controlled by more substantive regulatory mechanisms (such as strengthening the Resource Management Act – urban limit boundaries can create economic distortions), or alternatively through transport pricing mechanisms. IPENZ’s preference is transport pricing.

### **Planning and preserving transport corridors**

Since the enactment of the RMA there has been very limited ability to plan for and protect transport corridors. The results are some very expensive examples of retro – fitting transport networks in Auckland, Wellington and Christchurch. Clearly transport networks need to be installed in parallel with urban development. In many cases there are good cases for installing transport networks in advance of urban development. There is an example in Auckland with the Flat Bush town centre to provide a rail service in a greenfields environment. There are also plenty of examples overseas, including Australia where transport networks have been provided in green fields situations – infrastructure led development.

The shortsighted view of this in New Zealand is exemplified in the current provisions of the RMA relating to preserving transport corridors. The RMA provides, as a default mechanism, for designations to lapse in five years unless they are acted upon or progress has been made to justify a longer period. They can be longer if this was part of the original Notice of Requirement. In light of the longer planning periods of the State Highway Strategy and Long Term Council Community Plans, this current provision is an anomaly.

## **Improved urban design impacts are localised and long term**

Changing land use, increasing intensification and reducing urban sprawl have localised and limited impact on travel demand and will take a long time to become effective. This is because of the relatively small part of urban areas that is affected and the time it takes for new urban development patterns to change. It is therefore not expected that they will have a significant impact on travel demand, but they will still play a small part.

**In conclusion**, IPENZ believes that the good urban design requires a range of tools and interventions and the NPS will really only have an impact on a few elements of good urban design – principally on connections and in managing growth. In addition, these two issues need other mechanisms to support the provisions of an NPS including other legislation.

These two issues might be better dealt with under their functional areas with an NPS being one useful tool to address problems – rather than considering an NPS in search of a problem.

## **Question 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?**

IPENZ supports the general view that the NPS should be brief, and provide high-level principles, objectives and policies.

As explained above the NPS should deal with **transport** initiatives and **growth management** issues.

It will also be important to clarify the respective **roles** of regions and territorial authorities and the collaboration required to improve urban design. This may be the mechanism to promote “regional strategies” or “growth strategies” – for good long term planning – of which planning urban form and its connections are a part.

One of the seven essential design qualities of good urban design is **collaboration**. The urban environment is complex because of the many agencies, sections of the community and professional disciplines involved. The NPS should recognise this and encourage partnerships and collaborative and inclusive processes for urban design initiatives.

The NPS should also be supportive of an integrated and complementary approach to urban design across the relevant legislation – **clarify the roles of the respective legislation**, and where appropriate fill any gaps in the current legislative framework.

## **Question 3. What should not be covered by an NPS on Urban Design?**

IPENZ supports the view that urban design issues should be associated with built environment.

## **Question 4. At what scale or scales would it be appropriate for an NPS on Urban Design to provide direction?**

IPENZ supports the view that as a national document it should deal with the national/regional interface and inter-regional issues to support the broader interests on New Zealand. For example competition between territorial authorities for economic growth can be counter productive and not in the interests of wider New Zealand.

We believe that any policy associated with urban design is best implemented through the objectives and policies in Council's District Plans. We understand that most district plans have some provisions for urban design and we believe that these would be strengthened if an NPS made the process clearer.

**Question 5. What additional qualities do you consider should be reflected in an NPS on Urban Design?**

The NPS needs to promote good design. In addition, the NPS needs to enable local government to have the necessary design, architecture and landscaping skills required to fulfil the objectives of the NPS.

**CONCLUSION**

IPENZ appreciates the opportunity to make this submission and is able to provide further clarification if required.