Submission to the Ministry for the Environment

Proposed National Policy Statement on Urban Development

The discussion document has been prepared thoroughly and is well researched, and I support many of the measures it seeks to introduce.

But if you view the city as home to almost 70 percent of the world’s population by 2050, which is around the same time that we need to be carbon neutral to avoid catastrophic change in our environment, then you’d have to conclude the design of the future city is a matter of global and urgent importance. Set against this proposition, the discussion document’s suggestions are very much ‘business as usual’.

To achieve the city we all want – the ‘quality urban environment’ referred to frequently in the document – will require ever increasing levels of design. As levels of intensity of human use and habitation build up, the level of design required to keep amenity at acceptable levels increases exponentially. For while the city provides wonderful benefits for its inhabitants, the negative aspects of city living can easily overwhelm them if amenity levels fall. At some point on this scale, agglomeration benefits stall and the productivity of the city drops. There is evidence that traffic congestion in Auckland is one example of this, capping the productivity of the city at levels below those of the best performing comparable cities.

To maintain levels of urban amenity while also seriously addressing zero-emissions targets, public health, bio-diversity and resilience to climate change is a design challenge the likes of which we have not encountered before.

So it is surprising to see design mentioned so little in the discussion document. The few times it is mentioned, it’s in the context of ecological design (pg 27 and 58), and urban design is only mentioned on page 41 as a positive outcome of lower parking ratios!

I suggest the document’s focus on planning regulation, guidance and ‘the market’ will not deliver the cities we’ll need in 2050. A much broader view of the design of the city is required, along with the funding mechanisms and the decision-making methodologies to achieve it. The proposed NPS should not shy away from the need to actively design the city at all scales from regional transport systems to the neighbourhood community spaces to the living areas of the individual home. This is generally referred to as urban design or ‘city-building’, and I suggest it should be an integral thread woven into the NPS.

Often the discussion document hints obliquely at design quality. For instance on page 35 under the heading ‘Rationale’ reference is made to the “limited choice and variety of well-integrated, higher density housing”, and further “higher-density housing is not developed in a way that enhances the urban environment...”. Are these references to design quality? If so, why not say so?

By avoiding direct discussion of urban design and the important issues around it, the NPS as proposed will fail to effect the change we need, even to address the issues raised in Section 2, let alone the broader concerns noted above.
Assuming, however, that the NPS goes ahead roughly as outlined in the document, I suggest the top bullet-point in the pre-amble (page 27) should be:

- Incorporating a high standard of design for buildings and public spaces.

This would flow through to changing the Policy P2B, also on page 27, to read:

a) The positive impacts of well-designed urban development to contribute to a quality urban environment.

There are many other places where the value of good urban design should be reflected in the document, and I’d be happy to discuss these.

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I am an architect, urban designer and developer.
I was a director of ASC Architects in Auckland for 37 years to 2017,
I have been chair of the NZ Institute of Architects Urban Issues Group, and of the Urban Design Forum
I was national awards convener for the NZIA, and its Honorary Secretary in the 1990’s.
I worked on drafting the residential sections of the Auckland Unitary Plan, and submitted on behalf of the UDF regarding the removal of density controls and other matters.
Currently I’m deputy convener of the Auckland Council’s Urban Design Panels, and I’m developing a 15-apartment building in Mt Eden.
I also work as a Senior Urban Designer at Kāinga ora at Greenlane (0.4 FTE).