



SUBMISSION

to the Ministry for the Environment

Draft New Zealand Urban Design Protocol

27 September 2004

Introduction

The Cycling Advocates' Network (CAN) is pleased to present this submission on the Draft New Zealand Urban Design Protocol (hereafter the 'Draft Protocol'). The executive of the group has prepared this submission, with feedback from CAN members. Page number references relate to the hardcopy version of the Draft Protocol. If you require any clarification of the points raised by us, please feel free to contact us as detailed at the end of our submission.

General Comments

Cyclists are the canaries of the urban environment. If a town or city lacks cyclists, it has lost its heart and soul. A town or city that is conducive to cycling and walking exhibits all the characteristics of good urban design. Conversely, an urban area exhibiting good urban design will be good for pedestrians and cyclists. Cyclists have a vital interest in good urban design; hence CAN's support in principle for the Draft Protocol and good urban design in general.

CAN welcomes the publication of the Draft Protocol because we understand that good urban design is people-friendly and ecologically sustainable. CAN promotes cycling as a transport mode that is both people-friendly (with health, social inclusion and recreational benefits) and ecologically sustainable. Cycling is not only compatible with a liveable urban environment (being a mode of transport that ensures much greater efficiency in the use of roads) but contributes significantly towards creating a liveable urban environment. Every cycle trip that replaces a car trip makes our communities less car-dominated, quieter, cleaner and safer.

With more people cycling, walking and using public transport, fewer roads need to be built and widened, with the result that there is less noise and air pollution, less community severance and greater accessibility. Therefore, CAN's aims and the goal of good urban design appear to be mutually reinforcing.

CAN regards the creation of the Urban Affairs portfolio as a useful, indeed essential, step in promoting good urban design. We share the view, expressed in the Foreword, that the

publication of the Draft Protocol is an important part of the Government's *Sustainable Development Programme of Action*. So critical are the links between good urban design and urban sustainability that we consider the Draft Protocol should contain much clearer recognition of, and guidelines about, the links between transportation planning and land use.

In terms of the 6 Cs we are pleased to note the reference to choice of transport modes. However, it needs to be acknowledged that not all choices are ecologically sustainable. With education, encouragement and appropriate infrastructure and progressive urban design, cycling would be chosen by many more people than at present. There is great potential for more people to make some of their (currently motorised) trips by cycling.

As noted in the Draft New Zealand Walking and Cycling Strategy¹:

- Thirty percent of trips undertaken by mechanised transport (private motor vehicles, public transport, and bicycles) are for distances of under two kilometres.
- Sixty percent of trips are under five kilometres in length.

Walking and cycling have a huge potential in reducing the amount of, and hence the undesirable impacts of, motor vehicle traffic and are thus well able to support sustainable urban life.

Urban design may not be able to contribute to education about costs and benefits of transport choices but it has a key role in encouraging more people to cycle and in ensuring that appropriate infrastructure is available. It is pleasing to see that many cities around the world are recognising that cycling infrastructure is intrinsic to good urban design (for example the new walking/cycling bridges in Bristol in the UK as part of the Temple Quay redevelopment and floating harbour redevelopment).

One general issue that arises throughout the Draft Protocol is the lack of attention paid to urban sprawl and the undesirable effects of urban and suburban greenfield development. It will not be sufficient to ensure a high quality of urban design in new greenfield developments, which inevitably increase average journey distances, reduce accessibility and undermine the sustainability of our urban communities. Unless urban sprawl is managed, our towns and cities will become increasingly unsustainable, irrespective of the quality of urban design at an individual building or subdivision level. The Draft Protocol has a key role in attempting to minimise urban sprawl and greenfield development at this time.

¹ "Getting There – On Foot, by Cycle" Ministry of Transport October 2003

Answers to Draft Protocol Feedback Questions (p48)

<p>1.</p>	<p>Does the draft Protocol address the key design issues in New Zealand’s towns and cities?</p>
	<p>Predominantly yes, with the exception of the major urban design issue of urban sprawl, which we feel is poorly addressed. Continued low density, sprawling urban development at increasing distances from established urban centres undermines the viability of our urban areas and puts New Zealand at a competitive disadvantage compared with other countries. Urban design is a multi-disciplinary endeavour, and necessarily includes sound land use planning and transportation planning with a sustainable development focus.</p> <p>Land use planning that segregates uses geographically often results in local shopping and community functions being located at large distances from residential areas, giving people poor access to essential urban services unless they have access to a motor vehicle. We would like to see this better addressed in the Protocol, and have suggested some specific ways of doing this in our detailed comments (below).</p>
<p>2.</p>	<p>Will the draft Protocol and the proposals for making it happen outlined in Section 4 be effective in achieving quality urban design?</p>
	<p>The draft Protocol is a good start. Its ultimate success will depend on how many organisations become signatories to the Protocol and how representative the signatories are of the key stakeholders. We feel that the document mostly represents the points of view of architects and developers, with insufficient attention paid to sustainable land use planning, sustainable development and sustainable transportation. We have suggested specific wording changes in our detailed comments to attempt to change this balance.</p>
<p>3.</p>	<p>Are there other implementation tools that should be considered?</p>
	<p>We recommend the establishment of an Urban Design Council or enlargement of the Urban Design Advisory Group, expanded to better reflect key stakeholders and wider representation across New Zealand. The group would champion quality urban design across all sectors.</p>
<p>4.</p>	<p>How could the draft Protocol be amended to make it work better for you and your organisation?</p>
	<p>See our detailed comments below.</p>
<p>5.</p>	<p>Would your organisation be willing to become a signatory to the New Zealand Urban Design Protocol? (See Section 5.)</p>
	<p>Yes, CAN wishes to become a signatory to the Urban Design Protocol. We are very supportive of the principle of good urban design and the benefits that accrue to cyclists by virtue of good urban design.</p>

<p>6. What could your organisation do to implement the Protocol? (See Appendix 2.)</p>
<p>CAN will:</p> <ul style="list-style-type: none"> • promote urban design and the Protocol through our website and newsletters as being good for our towns and cities and good for cycling; • provide links from our website to good sources of urban design information on the Internet; • encourage our members to advocate for good urban design in their communities as part of cycling advocacy; • participate in urban design workshops, conferences, discussions and other processes; and • appoint an urban design champion within CAN to integrate urban design and cycling advocacy issues whenever possible.
<p>7. Please also indicate whether you wish to be placed on the Ministry for the Environment’s mailing list for updates on the Urban Design Protocol and related programmes.</p>
<p>Yes – please add us to the list.</p>

Specific Comments

Executive Summary (p5)

CAN recommends that the second bullet be re-worded as follows:

- Liveable places that provide a choice of housing, work, **transport** and lifestyle options.

The addition of the word “transport” to this list is fundamental to reinforce the fact that creating choices in housing, work and lifestyle options has critical transport, sustainability and equity implications.

Vision and Mission Statement (p6)

CAN recommends that the Vision be re-worded as follows:

- Making our towns and cities more **attractive and liveable** through quality urban design.

And throughout Chapter 2 of the document, rather than “Successful towns and cities ...” the wording should be “**Attractive and liveable** towns and cities...”

We consider that the word ‘successful’ shifts the focus to what is a by-product of good urban design. Instead the focus should be on towns and cities being attractive and people-friendly. To many people, success is defined in economic terms. The Protocol needs to ensure that success is much broader.

If it were the case that a key competitiveness factor was urban design then the most economically competitive areas would have superb urban design. But many economically competitive and successful areas of New Zealand lack quality urban design. That notwithstanding, as noted on p8, quality urban design can significantly enhance quality of life, health and well-being, and add value. The transportation system is a key factor in quality of life, health and well-being.

What is a Protocol? (p8)

As noted a protocol has no force in law. However, we would argue that a protocol can have considerable force if the parties are required not merely to “demonstrate the principles outlined in the document” (p8) but to “**make demonstrable progress towards achieving the vision**”.

We consider that the Draft Protocol should be strengthened to ensure that there is timely and substantive action by the parties.

Also, the action needs to be across the whole of an organisation. For example, it is very easy for a local authority to have tiny pockets of good urban design while the greater area is ignored. Similarly, some staff and policies may be actively supporting good urban design principles while others of the organisation are doing quite the opposite

To ensure liveability urban design needs to address issues of noise and lighting as well as more obvious ecological considerations such as air and water quality.

What is Urban Design? (p8)

This definition seems rather woolly (“Urban design is about...”). Is there not a more universally accepted definition? This is important to help set the context for the Protocol.

What Can Urban Design do for New Zealand? (p9)

The third paragraph starts: “In our cities the trend towards apartment living and intensification of inner suburbs has exacerbated the issues arising from poor design.” This leaves the impression that intensification is undesirable. We propose addition of the following sentence at the end of the paragraph: “**While the trend towards apartment living and intensification may have undesirable side effects if poorly designed, it has the very beneficial effect of increasing the viability of sustainable travel modes and reduction in travel demand.**”

Each Group has a Role to Play: (p10)

Central Government

Add new bullet:

- “Promote sustainability in urban design”

Local Government

Add new bullet:

- “Manage land development and redevelopment to minimise urban sprawl”.

Private Sector

An explanation as to which parts of the private sector are affected would be helpful. Are we talking about land developers, the banking industry, the automotive industry, private schools, medical specialists – the private sector has many connotations. Similarly, “Sector Organisations” and “Community” could be explained or defined.

Professionals

Add new bullet:

- “Work collaboratively with other professionals across many disciplines and with other stakeholders”

Attributes of Successful Towns and Cities (p11)

Add the words in bold below:

First paragraph: “Success does not occur by chance but as a result of good planning **and implementation...**” and

Third paragraph: “High quality design of urban spaces, places buildings, networks **and systems** is an essential...” Systems are often as important as infrastructure in ensuring successful (or attractive and liveable) towns and cities.

Liveable (p12)

Add a new sentence before the last sentence as follows: “Walking, cycling and public transport, in particular, are safe, convenient and practical options for travel for most work, shopping and educational trips.”

Environmentally Responsible (p12)

Last sentence – rearrange the sentence and add the word in bold below: “They minimise **land**, energy and water use and waste production and maximise the efficiency of infrastructure.” This change helps to reinforce the need for sustainable development and management of urban sprawl.

Chapter 3 Key Urban Design Qualities – The 6 Cs (p14)

We strongly endorse the notion that good urban design requires that buildings, places and spaces be seen not as isolated elements but as part of the whole town/city. Transportation is very often the medium that links all three elements. Therefore, it is central to good urban design and this needs to be recognised explicitly.

Context (p15)

We recommend that an additional sentence be added as follows:

Transportation planning is critical to good urban design as it is the key to mobility and

accessibility within the urban environment and the linkage between buildings, places and spaces.

As indicated above we question the priority given to choice. Not all choices are consistent with good urban design, particularly when it comes to transport. And some people's choices clearly constrain other people's choices not to mention their health and safety. The idea that people should be able to choose to make single occupant car journeys at will is effectively promoted by the Draft Protocol.

Motor vehicles, compared with pedestrians and cyclists, are noisy and emit harmful substances onto the roads and into the waterways and air. They physically endanger more sustainable modes of travel simply by virtue of their speed and volume. The Draft Protocol should explicitly discuss the inappropriateness of such freedom of choice. Freedom of choice may be desirable for individuals but this needs to be balanced against the public good. Land use and transport choices that impact negatively on others and on the biophysical environment should not be encouraged.

This page (addressing context) should be a key place in the document to reinforce the Government's priorities for sustainability under the Sustainable Development Programme of Action and Sustainable Cities project. We are missing a "whole of government" approach. in a document that purports to support this ("Coordinate policies and actions across whole of government" – p10).

The inclusion of the following additional bullets (nearer the top of the list, rather than the bottom) to those on page 15 partially addresses this point:

- considers and attempts to minimise the ecological footprint of every development
- maintains a distinction between urban and rural areas
- supports sustainability in transportation and energy

Photographs (pp 15-20)

The photographs are a great addition to help convey the concepts of good urban design. We would like to see:

- a wider geographic distribution (eg South Island, small towns)
- more streetscapes (to emphasise that transportation has a key role to play)

Character (p16)

Add new bullet after existing bullet number 2:

- protects and manages rural land from urban encroachment

Connections (p18)

There is a reference to “cycle tracks” but this creates the impression that cyclists are only on tracks that are away from roads. We would prefer the wording “**cycle lanes and paths**”. We strongly endorse the comments about the need for streets to be positive spaces and places with multiple purposes. At present streets are overwhelmingly in the service of motorists and do not serve as places for people to move on foot or by cycle, or to gather and meet, communicate and play.

A vast amount of real estate in past and new suburban developments goes to the carriageway to facilitate vehicle movements and parking, effectively increasing the cost of those developments. In addition, the viability of infrastructure for modes alternative to private motor vehicles is undermined because of the low density of development. Higher density residential development therefore is important and not just for the largest cities. Most New Zealand cities (even places such as New Plymouth, Palmerston North, Timaru, and Nelson) are increasingly affected by urban sprawl, which results in unsustainable transport.

New bullets are proposed as follows:

- places a high priority on walking, cycling and public transport instead of motor vehicle travel [suggested as the first bullet]
- helps minimise travel demand [suggested as the third bullet]

Custodianship (p19)

Insert new bullet at top of the list:

- minimises urban sprawl

Chapter 4 (p21)

- This is the critical part of the Draft Protocol as it outlines the actions that should occur as a result of a Protocol. In our view the Draft Protocol is weak because it lacks clear guidelines and concrete requirements. It is focused on building community awareness of urban design rather than on articulating the standards of quality urban design and addressing capacity among professionals.

We recommend:

- Capacity building for urban design professionals so that they have training in environmentally-sustainable transport modes (including cycling planning)
- Requirement to use available guides for cycling planning (e.g. NZ Supplement to Austroads Part 14)
- Require independent audit of urban design that includes audit of sustainability of transportation planning.
- The proposed Urban Design Toolkit and Urban Design Case Studies should include

examples of appropriate provision for cycling and other sustainable transport modes.

Actions to Implement the Protocol (p22)

Add a new bullet point as follows:

- showcasing quality urban design in its own facilities.

This new bullet requires a corresponding new section in the Action Pack (Appendix 2). The Action pack is mainly about supportive 'culture' and 'organisational infrastructure' for urban design rather than quality urban design itself – the outcomes. What is needed is to 'walk the talk' as well as 'talk the talk' of quality urban design.

Leadership by Government (p23)

Change the heading to "Leadership by Central Government"

Change the wording of the second bullet point to: “declaring 2005 as the Year of the Built Environment in New Zealand, to raise awareness of the built environment and quality urban design through funding collaborative activities with local government, industry, professional groups, sector and community groups.” The change is intended to reinforce the importance of central government in not only championing exemplary urban design, but also helping to fund it, especially during 2005, the Year of the Built Environment.

Insert new bullets as follows:

- “ensuring a ‘whole of government’ approach is taken to urban design issues, including the integration of sustainable transportation”
- “establishing and funding an Urban Design Council (or enlarging the Urban Design Advisory Group) to bring together key practitioners in central and local government, industry, academia, and interest groups to maintain a focus on urban design issues in New Zealand and oversee the Urban Design Toolkit, Case Studies and research. The group should meet approximately quarterly and expect to be in existence for a period of at least five years.”

New Zealand Transport Strategy (p29)

There should also be a reference to the National Walking and Cycling Strategy *Getting There – On Foot, By Cycle* (draft published October 2003, or the final document due to be published by the end of 2004). Similarly, the Land Transport Management Act should also be referenced.

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The Cycling Advocates' Network of NZ (CAN) Inc is this country's national network of cycling advocate groups. It is a voice for all cyclists - recreational, commuter and touring. We work with central government and local authorities, on behalf of cyclists, for a better cycling environment. We have affiliated groups and individual members throughout the country, and links with overseas cycling organisations. In addition, several national/regional/local government authorities, transportation consultancies, and cycle industry businesses are supporting organisations.