

Submission form

Building sustainable urban communities – *Tell us what you think!*

The Sustainable Urban Development Unit would like your input and advice on ways to encourage sustainable urban development in New Zealand. The *Building Sustainable Urban Communities* discussion document outlines a range of issues, options for tools and powers to support sustainable urban development, and a possible approach to bring these elements together.

We want to know what you think. You can use this submission form to answer the questions highlighted in the document. Other comments are also welcome.

We encourage feedback — it improves our analysis and decision-making process to get ideas and a range of views from people and organisations with interests and experience in sustainability and urban development.

Please call us on (04) 495 9361 if you have any questions.

How to submit

This submission form is in a Word format. You will need to download this submission form and save it to your hard drive before you fill it in. Use the 'Tab' key to move to the next fill-in field (Shift+Tab to move back to the previous field). Then, you can email the submission form to sudu@dia.govt.nz, or print it out and post it to:

Sustainable Urban Development Unit
The Department of Internal Affairs
PO Box 805
Wellington 6011

You can also order a hard copy of the *Building Sustainable Urban Communities* discussion document by emailing sudu@dia.govt.nz

**Please send us your comments by
Friday 28 November 2008.**

Please note that all correspondence and comments on this matter may be the subject of a request under the Official Information Act 1982. If there is any part of your correspondence that you consider could properly be withheld under the Act, please let us know, along with any reasons you would want it withheld.

**Thank you for sharing your comments and ideas
with us.**

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Contact details

Title	Mr
First name	Nick
Surname	Collins
Address (Street/Box number)	PO Box 74 618, Market Rd
(Town/City)	Auckland 1543
Email	office@beaconpathway.co.nz
Contact telephone number	09 522 5170
Organisation (if applicable)	Beacon Pathway Ltd
Position (if applicable)	General Manager
Are you submitting this as:	<p>On behalf of a group or organisation?</p> <p>Beacon Pathway Ltd (Beacon) is a research consortium that seeks to radically change the design, construction and renovation of New Zealand's homes and neighbourhoods. Beacon aims to bring about a significant improvement in the sustainability of the residential built environment in New Zealand through science-based New Zealand research.</p> <p>The Foundation for Research, Science and Technology matches funding from Beacon's shareholding partners, a unique mix of industry, local government and research organisations: BRANZ, Scion, New Zealand Steel, Waitakere City Council and Fletcher Building.</p> <p>Beacon's vision of:</p> <p style="padding-left: 40px;">Creating homes and neighbourhoods that work well into the future and don't cost the Earth</p> <p>will be realised through the achievement of the following two goals:</p> <ol style="list-style-type: none"> 1. To bring the vast majority (90%) of New Zealand homes to a high standard of sustainability by 2012 and; 2. That every new subdivision and any redeveloped subdivision or neighbourhood from 2008 onwards be developed with reference to a nationally recognised sustainability framework.

General questions

General comments on the *Building Sustainable Urban Communities* discussion document

Beacon recognises that cities and settlements are the contexts in which, for the vast majority of people, their social and economic lives are carried out. The built environment in which social and economic life is carried out is a major determinant of environmental outcomes in two ways, both of which need active planning and management. Firstly, the built environment directly impacts on bio-physical environments and ecosystems. Secondly, built environments impact on the way in which people live.

Beacon wishes to reinforce that:

- A multiplicity of tools/mechanisms for funding, investment, land assembly and project development is more likely to be effective and ensure good fit to purpose than having a single set of tools.
- The effective application of funding, investment, land assembly and other urban development tools is contingent on:
 - Good leadership.
 - A clear vision of the outcomes sought by each project in the context of a strongly expressed strategic, outcomes-based strategy for the city.
 - Improving New Zealand's expertise and capacity in urban planning, design, and infrastructure and building delivery.
 - Transparency.
 - Clear accountabilities and responsibilities.
 - Transparent, effective, co-ordinated and streamlined processes across planning, consenting and investment.
 - An effective regulatory system that reflects the outcomes sought.

In Beacon's view, the key to sustainable urban development and redevelopment is to find purposeful ways that key players can engage with urban planning and development to optimize the social, economic and environmental benefits to them of liveable cities while ensuring that benefits to others are not degraded. All urban development should be directed to:

- liveability
- resilience
- optimising benefits while reducing adverse effects.

Consequently, the mechanisms for urban development and redevelopment need to:

- be comprehensive
- be collaborative in nature
- investment oriented
- directed to stimulated better decision-making
- focus on the regeneration, improvement and reconditioning of the existing built environments of cities/ towns
- allow for a precautionary approach to be taken with regard to any developments outside the boundaries of existing built environments
- be design-based
- adopt and promote urban design that facilitates the interconnections between households, neighbourhoods and broader town and city infrastructure and amenities
- adopt urban design that develops resilient neighbourhoods and businesses including:
 - Producing and managing key resources within local built environments, particularly energy and water.
 - Recycling of waste within the urban environment.
 - Protecting soils that can be used for food production at the household or neighbourhood scale.

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Which options or ideas do you think would be effective in encouraging sustainable urban development?

Beacon supports, in principle, the idea of tools and processes to enable more sustainable place-based development such as those outlined in this discussion document. The following comments complement Beacon's submission on the possibility of a National Policy Statement on Urban Design (Oct 2008.)

The key themes that Beacon supports include: regional collaborative prioritising of strategic development locations within an urban consolidation context; designing a comprehensive multi-stakeholder vision and development plans; building capacity of urban design and broker skills (see below); utilising innovative financial tools for funding; the amendment of regulations to make low impact urban design mandatory for new development; and some streamlining (with some reservations) of planning processes.

Focus on existing built environments

The focus needs to be on the regeneration, improvement and reconditioning of the existing built environments of cities and towns. Too frequently urban design policies, protocols, organisations and tools are directed at new developments or significant redevelopments and developments associated with significant changes of use such as the current redevelopment of Hobsonville. The reality is, however, that the environmental, social and economic viability of our settlements is dependent on built environments that will not be able to be cleared and redeveloped as a clear greenfield, brownfield or greyfield site. The urban development tools, investments and organisations need to ensure that regeneration and the improved performance of existing built environments is prioritized over new sites.

A precautionary approach needs to be taken with regard to any developments outside the boundaries of existing built environments. Urban design needs to facilitate the interconnections between households, neighbourhoods and broader town and city infrastructure and amenities.

Focus on resilience

Urban design should develop resilient neighbourhoods and businesses including:

- Producing and managing key resources within local built environments, particularly energy and water.
- Recycling of waste within the urban environment.
- Protecting soils that can be used for food production at the household or neighbourhood scale.

A resilience orientation rather than an adverse effects approach needs to be undertaken.

Mechanisms for ongoing management

It is also important that the mechanisms for urban development do not simply deal with initial investment. On-going management of developments and redevelopments is required. Without appropriate on-going maintenance of settlement systems, the liveability and sustainability of settlements will be compromised irrespective of the merits of its fundamental design characteristics or the effectiveness of the tools used to fund, assemble land for and build new or redeveloped sites.

Optimise connectivity

Finally in developing better tools and structures for urban development and investment, it must be recognized that city and town systems are by their very nature cross-scale. They connect dwellings and the people that live in them to neighbourhoods and a hierarchy of amenities and systems constitute towns and cities as a whole. Urban development mechanisms must optimise connectivity while building local resilience within towns and cities. It must allow for planning at a regional level in a way that actively protects rural resources, particularly soils, and sets out performance principles for provincial towns and settlements.

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What are the impacts of the options? What changes or additions would make these options or ideas work more effectively?

Beacon believes it would be highly desirable to have a **National Policy Statement on Urban Design** or similar framework, which sets out sustainability principles as the underlying framework for urban design and development both for new development or redevelopment of sites. This would include an emphasis on resilience and low impact design to produce in particular developments which are low on water, waste and energy.

Further there needs to be a **national focus on valuing and building capacity in:**

- **urban design skills** which are based on clear sustainable development principles-a quadruple bottom line approach.
- **brokering and facilitation skills**, also fundamentally infused with a sustainable development approach, to enable these complex processes to flow more smoothly. Often urban design specialist people are left to facilitate processes themselves. Processes as complex as these need people who understand both the broad principles and how they play out on the ground, and are focused on the people-side of a process, in order to achieve an outcome in the most consensus-based way possible. There may well need to be bottom line tools/regulatory instruments but as much as possible developing collaborative processes which deliver outcomes in a timely way. This needs huge skill.

The discussion paper tends to present a rather linear view of roles and responsibilities in relation to urban development. This is expressed in the way in which the roles of key players are represented. An example is Figure 1 in which central government and local government are pitched as being opposite ends of models for development. It is clear that **a linear approach is not likely to be effective**. The reality is that urban development and redevelopment works on a number of different scales and can occur as either a purposeful collaboration between key agents in urban change or simply be an accretion of the decisions of various agents within the urban landscape. Those agents range from local and central government, private sector developers, businesses, and householders.

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Are there any other options or ideas you have seen or thought of?

The concept of **resilient neighbourhoods/communities** is not explicitly spelled out in this document. With the oncoming of climate change, peak oil and economic tightening, the need for development that is well connected and serviced by public transport, and housing/commercial building stock which is energy, water and waste efficient, will become even more imperative. The quality of the vision of any place-based development needs to include not only a demand management approach to the management of natural resources but also opportunities for diversity of supply - water, energy and localised waste management.

The issue of **affordability** is also critical, so any means to create warm, healthy homes that are affordable and sustainable will be very important as the poor and vulnerable will be the most affected by the oncoming threats.

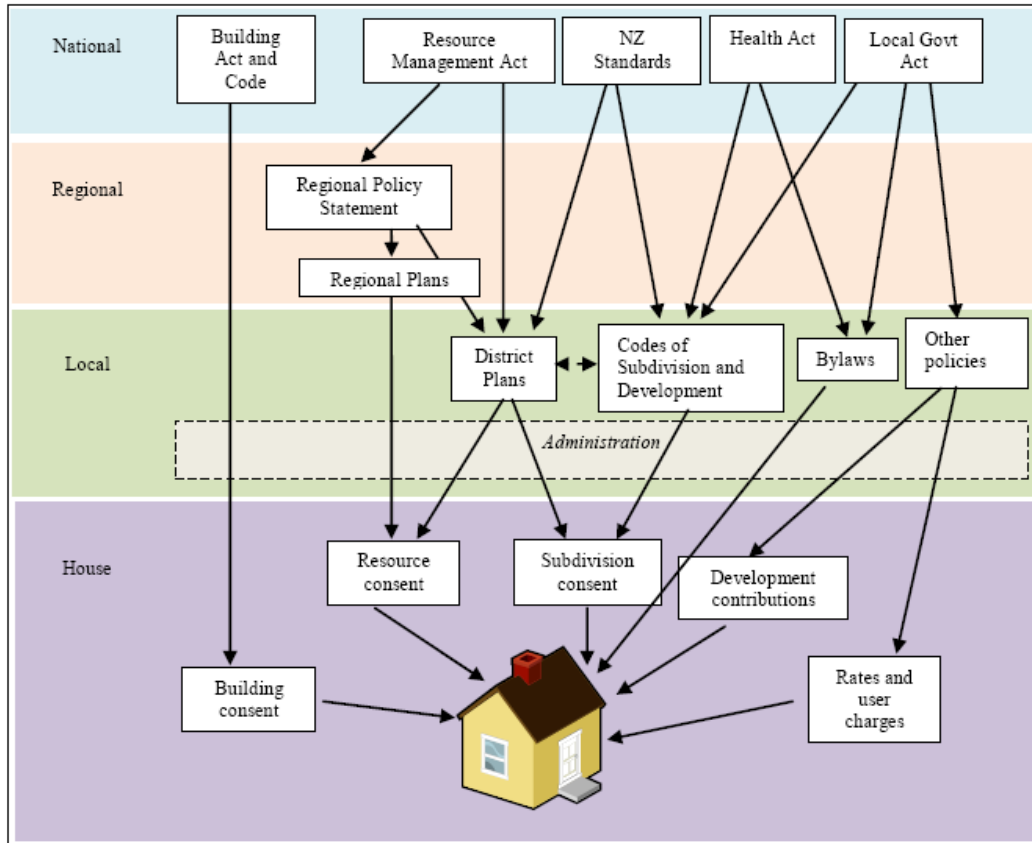
Specific questions

Barriers and implementation difficulties in sustainable urban development in New Zealand

1a What is slowing down, preventing, or reducing the quality of sustainable urban development? Please give examples.

- Complex and often conflicting planning and consenting processes in NZ, which frequently deter, rather than encourage, sustainable development (please refer to the diagram of **Local government legislative and policy mechanisms that affect sustainable housing** below)
- In a rapidly changing environment, regional and district plans, (developed up to 10 years ago), frequently restrict potentially sustainable developments to a past regulatory environment.
- Lack of holistic sustainable development projects which demonstrate to other developers and home occupiers what can be achieved.
- Lack of incentives to encourage and reward developers to move beyond the status quo.
- Consumers who don't know what they should be demanding.
- Lack of use / acceptance of tools to measure and evaluate the sustainability outcomes of new / existing neighbourhoods.
- In the wake of "weathertightness," councils have failed to manage the risks inherent in development / building in a pragmatic and professional manner.
- Weak legislative requirements for water and energy efficiency in building stock (Building Act and Building Code)
- Lack of community understanding for the need for urban consolidation (particularly in spread cities like Auckland.)
- Weaker capacity in urban design skills in-house in peri-urban communities.
- Traditional practices/mindsets in some professions/trades
- Lack of strong collaborative processes/skills that can enable connected comprehensive planning and implementation.

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1b What can be done to deal with these barriers?

- Government partner with industry to develop quality sustainable urban developments.
- Serious incentives to developers to develop high quality.
- Fast track planning for developments which are shown, (through the application of objective tools), to have sustainable outcomes.
- Clear and consistent sustainable development frameworks at all levels of government policy and legislation
- Capacity building in urban design and sustainable development and brokering/facilitation skills
- Profiling of, and leadership by, those in the business community who see the opportunities (not negatives) around more resilient building practices

Strengthening existing tools and ways of working

2a What can be done within existing regulations and legislation to deal with these barriers? Please outline your ideas for:

- better ways of working
- new non-regulatory tools
- ways to use or change existing regulatory tools to make them more effective

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- Adoption of frameworks / tools to objectively evaluate the sustainability of developments.
- Supporting DBH and MfE to strengthen water/energy efficiency requirements for new development in existing legislation in order to be more resilient. This would have minimal impact if at all on cost.
- A series of workshops showcasing good practice which reaches more than those who are already conversant with these ideas. A community development or social marketing method could be explored whereby more creative ways of engaging the various sectors involved in urban design - the utilities, the planners, the transport people, developers, the business community to understand more thoroughly the huge benefits of more sustainable urban development.

2b Are changes to existing regulation and legislation necessary to achieve sustainable urban development? Please describe any changes you think are necessary.

- Amend section 76 of the RMA so that a performance standard can be required for in-house water efficiency which goes beyond the Building Code.
- Amend section 76 of the RMA to clarify the use of rules in a District Plan to give meaning to section 5(2) (a) and (b) of the Act.
- Standing firm or enhancing proposed amendments for energy efficiency in the Building Code and setting specific water efficiency performance standards for all new developments.
- Developing a National Water Act which emphasises the wise use of available water and acknowledges its value as an increasingly scarce resource.
- Developing a water equivalent of EECA to oversee water efficiency and conservation projects.

2c Are there any barriers to iwi Māori becoming involved in partnerships to deliver sustainable urban development projects? Please describe these barriers.

A clash of cultures - where the world-view and processes of Maori are not recognised or valued - e.g. in heritage or 'mauri' issues. With good brokering and openness to different perspectives on issues, these barriers should be able to be negotiated into a win-win outcome. This could well save time and money of all parties.

Ideas, options and issues: **The role of government in sustainable urban development**

3a How can central and local government support sustainable urban development?

- Have clear frameworks and consistent policies, regulatory regimes and implementation practices based on sustainable urban development.
- Develop specific resilience plans (responding to climate change and peak oil) that would include demand management and diversity of supply as priorities, and take into account in the prioritisation of place-based sustainable urban development the predicted extreme weather events, the risks of flooding, sea level rise and rise in temperatures.
- Substantially shift investment into a strong national rail network for people and freight, encourage shipping, and the active development of cycling and pedestrian linkages.

3b What role should the following players have in sustainable urban development projects?

- Local government
- Central government

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Central Government

- Setting the frameworks
- Enabling legislation and mechanisms
- Having a significant sustainable urban development investment allocation
- Capacity building in urban design skills and brokering on a national scale-the sorts of ideas that are outlined on P 13 of the discussion document.
- Make sure that emphasis goes on face-to-face engagement not just producing written manuals and guidelines, whether in hard copy or web-based. There are huge numbers of those already. What people want is the human, interactive dimension.

Regional/Local Government

- Facilitating the collaborative processes
- Building local capacity
- Sharing examples of good practice
- Drafting helpful District Plan provisions. There is a strong need to have the big picture in mind when developing local plans/rules/investment decisions.

Ideas, options and issues: **Improving co-ordination and integration**

4a How can co-ordination of investment and integration of planning be improved?

- A national whole-of-government framework is needed to outline a 'more planned and systematic approach' to a National Policy on Urban Design which builds on the Urban Design Protocol. It needs to have flexibility about the form the structure for developing a place-based focus would have, ie the range described in the diagram on P 16. from direct Crown control to direct local authority control.
- A National Policy Statement on Urban Design would definitely help - setting out clearly the sustainability elements (quadruple line approach)
- An Advisory Team for Large applications, such as ATLAS in the UK, sounds a useful mechanism, enabling consistency, avoiding reinventing the wheel and saving time and money.

Ideas, options and issues: **Funding**

5a How could sustainable urban development be funded?

- Collaboration and joint planning of public and private investment, in a good process, a clear framework, with bottom lines and negotiated win-win solutions.
- Government (local and central) should assume the role of enabler and provide the frameworks, tools and incentives for business to develop sustainable communities.
- Abolish development levies. Rather councils could take a long view with respect to the additional rates which will accrue from a sustainable development and the lower infrastructure burden on the city and provide developers with development incentives.

5b Who should fund infrastructure assets, services or amenities required in a sustainable urban development

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	project?
	A combination of public and private organisations based on who benefits.
5c	To partly or fully fund sustainable urban development, do you support a value uplift levy to capture 'unearned' gain resulting from public actions to increase scope for development? Please explain your view.
	Certainly not. Refer 5a above
5d	What issues would need to be considered when designing and implementing a value uplift levy?
	A fair way of allocating that does not deter private investment. A transparent and collaboratively developed methodology.
5e	What other funding mechanisms could be used in sustainable urban development?
	<ul style="list-style-type: none"> ▪ Long term loans by central / local government and these loans to be serviced and retired from future rates revenue. ▪ Encouraging locally based business based around sustainable urban development, enhancing local economy and minimising transport costs for the best products.
5f	Are there funding mechanisms that would provide incentives for private involvement in sustainable urban development?
Ideas, options and issues: Land assembly	
6a	Are there circumstances in which powers to compulsorily acquire land for urban development purposes would be warranted? Please describe these circumstances.
	<ul style="list-style-type: none"> ▪ Should be used rarely and with many protective mechanisms. If the process is sound, careful and thorough, this should be able to be avoided. ▪ There are good case studies available which can be drawn on to enable land acquisition to be carried out without minimum disruption, such as the successful buyout of 80+ properties in Waitakere City.
6b	Where the use of central government or Māori land is important to a sustainable urban development project, how could Māori interests in that land be protected?
	It is essential that all stakeholders, including Maori, are engaged in the process in a real way. This relies heavily on good will, trust, sensitivity to different world views and a well-designed process.
6c	What are the advantages and disadvantages of the options?

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	<ul style="list-style-type: none"> ▪ A good collaborative process, within a clear framework, is much more likely to be time and cost efficient - avoiding lengthy litigation or things like sheer human cussedness! ▪ A more regulatory Public Works Act approach should only be used as a very last resort and should have a very careful process around it.
6d	Are there other options? Please describe them.
	A useful case study of the buyout of properties, mentioned above, without resorting to the Public Works Act or any community uprising, may be useful. Funding for the writing up of this leading-edge process is about to be sought by Waitakere City Council from MfE.
6e	<p>Who should have the power to make compulsory land acquisitions?</p> <ul style="list-style-type: none"> • A minister • A local authority • A company • An urban development organisation
	High level
6f	What is required to support land readjustment as a way to assemble land for sustainable urban development?
	An agency which takes a co-ordinating and catalyst role, with the ability to bring people together and develop a collaborative and fair process
6g	Are there other options to assemble land for sustainable urban development?
	Foresighted investment by either private or public agencies.
Ideas, options and issues: Streamlining planning and development control processes	
7a	Are changes required to planning and development control processes to support sustainable urban development?
	In any moves made to 'streamline' the RMA processes, then the vision and comprehensive process for the development of an area of land becomes extremely important. Investigation of the suggestions on page 32 sounds sensible.
7b	To encourage sustainable urban development, how could planning processes be simplified or streamlined?
	Having a clear framework, having a well brokered facilitated process should streamline decision making. Ensure consent processes are straightforward and support agreed strategic direction.
7c	To encourage sustainable urban development, how could consenting processes or requirements be simplified or streamlined?
	It is more a matter of lining up the vision, the agreed outcomes, and getting a consistency of approach and an openness by stakeholders to work together and resolve differences by mediation, rather than cutting into

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democratic processes.

7d Are there other options to streamline or simplify planning and development control processes for sustainable urban development?

Ideas, options and issues: **Housing supply, choice and affordability**

8a What options could be used to increase the supply of affordable housing, or improve housing affordability, in sustainable urban developments?

- Need to focus on our existing communities and improve the sustainability of our existing housing stock.
- Recognise that New Zealand's housing has a critical role to play in delivering to the nation's Energy Strategy target that, by 2025, 90% of New Zealand's energy is targeted to come from renewable sources. Our homes use 33% of New Zealand's electricity so they are a very good place to start in improving energy efficiency and in generating renewables.
- Focus on alternative funding models – for example, shared equity models - rather than trying to build cheaper houses.
- Need to consider affordability from a whole-of-life of housing, rather than just the initial capital cost. True housing affordability will be delivered through sustainable housing which is warm, dry, comfortable and healthy resulting in lower costs for both the home occupier (lower energy / water bills, lower private health costs) and the nation (lower social and health costs and higher productivity of healthy home occupiers) .
- The options outlined on P 34 round such things as economies of scale and the innovative use of tools to enable lower cost housing to be built are worth exploring. With larger scale developments, more resilient and community scale water and energy solutions become more feasible as well.

A possible sustainable urban development approach

9a What other approaches to sustainable urban development could be used in New Zealand? Please describe them or provide examples and references.

9b What do you think about this place-based approach to sustainable urban development?

The comprehensive place-based approach offers a lot of opportunities to create much better connected, low impact, resilient developments.

How the approach might work

9c What organisations should be allowed to use any new tools and powers?

- This is where a very carefully defined overarching sustainable development framework is critical with Government/regional/local government policies and regulations consistent with this direction.
- It needs people with the right skills- urban designers, brokers, community development workers and

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planners, who understand the changing environment in which we will be operating.

- Only then can new and sometimes risky new tools be used by central or regional government.

9d

Within a declared sustainable urban development area, what tools should be available to:

- Coordinate planning and investment?
- Fund development?
- Assemble land?
- Simplify or streamline planning processes and/or consenting requirements?

Encourage the provision of affordable housing?

ibid.

Any further comments?

10a

Do you have any other comments on the options and ideas within this discussion document?

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