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## Draft New Zealand Urban Design Protocol

Submission to the Ministry for the Environment  
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### Introduction

The IPENZ Transportation Group ("IPENZ TG") is pleased to present this submission on the Draft New Zealand Urban Design Protocol (the Draft Protocol). IPENZ TG consists of over 600 transportation and traffic engineering professionals working in central government, local government and the private sector. IPENZ TG represents a segment of considerable expertise in the fields of traffic and transportation and has a significant contribution to make to urban design.

The management committee of IPENZ TG has prepared this submission, with input from members. Page number references relate to the hardcopy version of the Draft Protocol. For further clarification of the points raised in this submission, please contact us.

### General Comments on the draft NZ Urban Design Protocol

Roads and streets are a critical component of our urban areas. The design, management and operation of these facilities have a significant impact on the quality of urban life. IPENZ TG members have a keen interest in, and responsibility for, streets and streetscape design. We are concerned for the wellbeing of all road users, including pedestrians, cyclists, public transport users, and other motor vehicle drivers and occupants. We are also concerned for the social good, including the impacts that traffic and transportation systems and decisions have on the community.

Our members influence urban design through their involvement in planning and design of urban transport systems. We believe that this influence should be positive for all street stakeholders to the maximum extent possible; hence IPENZ TG's support in principle for the Draft Protocol and good urban design in general.

We support the Government's policies for a sustainable<sup>1</sup> land transport system. With more people walking, cycling and using public transport, and using motorised vehicle more efficiently, better use can be made of our transport system, with the result that there will be less noise and air pollution, fewer greenhouse gas emissions, less community severance and greater accessibility for a wider cross section of society.

IPENZ TG welcomes the creation of the Urban Affairs portfolio to promote good urban design. We share the view, expressed in the Foreword, that the publication of

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<sup>1</sup> The Brundtland Commission (in 1987, for the United Nations) defined sustainable development as development that meets the needs of the present without compromising the ability of future generations to meet their own needs.

the Draft Protocol is an important part of the Government's ***Sustainable Development Programme of Action***.

One general issue that arises from our perspective 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 to play in attempting to minimise urban sprawl and "Greenfield" development at this time.

Urban sprawl threatens to undermine the quality of urban life in New Zealand, particularly in Auckland, but also in many other centres, including greater Wellington, greater Christchurch, Hamilton, New Plymouth, Palmerston North, Timaru and Nelson.

As noted in the Draft New Zealand Walking and Cycling Strategy<sup>2</sup>:

- 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. Similarly, comprehensive public transport systems can reduce the need for private motor vehicle travel, with consequential improvements in quality of life for all.

But walking, cycling and public transport all benefit from higher land use densities and more compact urban areas than are typical in New Zealand's towns and cities. Similarly, mixed land use practices, that encourage local shops in residential neighbourhoods, for example, help reduce motor vehicle traffic and improve the quality of urban life.

### **Answers to Draft Protocol Feedback Questions (p48)**

<p><b>1. Does the draft Protocol address the key design issues in New Zealand's towns and cities?</b></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</p>

<sup>2</sup> "Getting There – On Foot, by Cycle" Ministry of Transport October 2003

<p>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><b>2. Will the draft Protocol and the proposals for making it happen outlined in Section 4 be effective in achieving quality urban design?</b></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 integrated and sustainable:</p> <ul style="list-style-type: none"> <li>• land use planning,</li> <li>• infrastructure</li> <li>• development and</li> <li>• transportation.</li> </ul> <p>We have suggested specific wording changes in our detailed comments to attempt to change this balance.</p>
<p><b>3. Are there other implementation tools that should be considered?</b></p>
<p>We recommend the enlargement of the Urban Design Advisory Group, expanded to better reflect key stakeholders and wider representation across New Zealand. Alternatively, a new Urban Design Council could be established to achieve the same function. This group or council would champion quality urban design across all sectors.</p>
<p><b>4. How could the draft Protocol be amended to make it work better for you and your organisation?</b></p>
<p>See our detailed comments below.</p>
<p><b>5. Would your organisation be willing to become a signatory to the New Zealand Urban Design Protocol? (See Section 5.)</b></p>
<p>Yes, IPENZ TG would consider becoming a signatory to the Urban Design Protocol. We are very supportive of the principle of good urban design.</p>
<p><b>6. What could your organisation do to implement the Protocol? (See Appendix 2.)</b></p>
<p>IPENZ TG and its members can:</p> <ul style="list-style-type: none"> <li>• promote urban design and the Protocol through our website and newsletters as being good for our towns and cities;</li> <li>• provide links from our website to good sources of urban design information on the Internet;</li> <li>• encourage our members to adopt good urban design practice in their professional endeavours;</li> <li>• increase the understanding of our members by encouraging participation in urban design workshops, conferences, discussions and other Continuing Professional Development courses; and</li> <li>• appoint an urban design “champion” within IPENZ TG to help implement good urban design practices within our professional practise and spheres of influence whenever possible.</li> </ul>
<p><b>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.</b></p>
<p>Yes – please add the IPENZ TG to the mailing list.</p>

## Specific Comments

### ***Executive Summary (p5)***

We recommend 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.

### ***What is Urban Design? (p8)***

The existing definition is a paragraph of four sentences that describe urban design but do not define it succinctly. Various definitions are provided on the Internet; one that may be suitable is:

The attempt to give form, in terms of both beauty and function, to entire areas or to whole cities. The focus is on the massing and organization of buildings and on the spaces between them, rather than on the design of individual structures.  
[www.sactaqc.org/Resources/primers/Glossary\\_Land\\_Use.htm](http://www.sactaqc.org/Resources/primers/Glossary_Land_Use.htm)

Others include:

- (a) Urban Design being an activity as much as an outcome.
- (b) Urban Design depends very much on function/activity, not simply on built-form, though the appropriate arrangement of built-form is clearly required.

### ***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”.

Professionals

Add new bullet:

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

The Draft Protocol suffers from too little input from transportation professionals (notwithstanding the inclusion of one transportation practitioner on the Urban Design Advisory Group). Our Group wishes to see more representation from transportation professionals and especially those with practical design experience and expertise. As a country, we cannot afford to work on urban issues without taking a much more holistic view. This will mean that a more collaborative and integrated approach needs to be taken in urban design, infrastructure requirements, land use planning, architecture and landscape design. We accept that the reciprocal needs to apply too – these professions need to be involved in transportation issues as well as traffic engineers and transportation planners.

### ***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, design **and implementation...**” and

Third paragraph: “High quality design of urban spaces, places buildings, networks **and systems** is an essential...” Systems (such as public transport) are often as important as infrastructure in ensuring successful towns and cities. An example is the newly developing field of travel demand management, where communities at the individual and household level are encouraged to evaluate their transport and lifestyle choices to reduce transportation demands.

### ***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.” Addition of this sentence will help to explain what is meant by the existing statement that liveable places “are easy to move around, with a variety of transport options and accessible services”. Mixed land use planning will improve liveability through addressing overall accessibility as well as providing sustainable transportation outcomes.

### ***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 or city. Transportation is the medium that links all three elements - transportation space is a multi-functional space, and is integral to urban design. Therefore, transportation is central to good urban design and needs to be recognised explicitly.

### ***Context (p15)***

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. The Draft Protocol would be strengthened by reference to a “whole of government” approach. This is generally intended in the Draft Protocol, as noted on page 10 (“Coordinate policies and actions across whole of government”).

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:

- is supported by a “whole of government approach” to urban issues
- 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 and small towns)
- more streetscapes (to emphasise that transportation and infrastructure have key roles to play)
- emphasis on the multi-functional aspect of the transportation spaces.

### **Character (p16)**

Add new bullet after existing bullet number 2:

- protects and manages rural land from urban encroachment

### **Choice (p17)**

We question the unchallenged 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. Motor vehicles in high volumes and/or at high speeds lead to "community severance", where communities are severed by roads, and pedestrians and cyclists are unable to travel freely between one side and the other. Public transport at least has the advantage of reducing environmental impacts on a per passenger basis compared with private, single occupant motor vehicles (which comprise most traffic on any given road).

Motor vehicles 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 needs to be balanced against the public good. Land use, infrastructure and transport choices that impact negatively on others and on the biophysical environment should not be encouraged, unconstrained transport choice leads to consumption of non-renewable energy resources.

We recommend that an additional sentence be added to the existing paragraph as follows:

"Integrated transportation, infrastructure design and land use planning are critical to good urban design as they are the keys to mobility and accessibility within the urban environment and its buildings, places and spaces. Decisions such as the siting of schools, hospitals and other public service facilities can profoundly influence whether and how people can access these services."

### **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 more general wording "**cycle lanes and paths, footpaths**". Ferries could also be added to the list of transport infrastructure.

New bullets are proposed as follows:

- places a high priority on walking, cycling and public transport instead of private 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 could be strengthened by the addition of 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. Perhaps these things will take time to evolve, however.

### ***Actions to Implement the Protocol (p22)***

Add new bullet points as follows:

- showcasing quality urban design
- working collaboratively with other professions and stakeholders
- promoting professional understanding and expertise.

### ***Leadership by Government (p23)***

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. This 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 Land Transport Management Act (2003).

### ***Central Government Actions (p36)***

Logically, this section should precede Local Government Actions on page 32

## **Conclusion**

The Draft New Zealand Urban Design Protocol is an important first step in improving the quality of urban design in our towns and cities, and central government leadership is acknowledged and applauded. IPENZ TG looks forward to continued involvement in the processes underway to achieve a revitalisation of urban areas so that they become as widely appreciated and recognised (by New Zealanders and visitors alike) as our rural and wilderness areas.

**Submission of IPENZ Transportation Group made by**

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