Planning for successful cities - a proposed National Policy Statement on Urban Development

Submission Reference no: 11

Benjamin William Ross

Clause

Question 1. Do you support a national policy statement on urban development that aims to deliver quality urban environments and make room for growth? Why/Why not?

Position

Somewhat

Notes

I support the NPS-UD in part (so somewhat) as there are parts of the document I agree with, parts of the document I disagree with (particularly around Greenfield developments) and part which could be reinforced (such as enabling community planning rather than the legalistic situation where we hear more from RMA lawyers than the citizens and businesses who must live with the consequences of any Planning decision. "The planning system has also struggled to ensure the voices of the community can influence planning. The concerns of tangata whenua are often not taken into account. Current processes for public participation tend to favour wealthier property owners over others (in particular younger, non-English speakers, ethnic minorities, the less educated and renters). " The above example was made starkly clear in the Auckland Unitary Plan Independent Hearing Panel days of 2013 and 2016. The Unitary Plan was an unwieldy document as it stood to read even for native English speakers. The submission guidelines contributed to truncated submissions from submitters and while the IHP led by Judge Kirkpatrick were more than helpful and did their best to help submitters in the Hearings (I was a submitter) the process was extremely daunting and again tied up in legalism with the Planners and RMA lawyers. There was very little chance of any community led planning outcomes. The IHP saga MUST be avoided in the NPS-UD. In the Northern Hemisphere especially North America it is becoming more common for communities to lead planning and for the experts and professions to facilitate the entire process (rather than the other way around). A City is known by its people and those people are often in the best position on leading a city forward. Yes there will always be NIMBY's but strong leadership and proper communication defeats NIMBYism. "The aim is to encourage more effective growth, particularly close to frequent public transport, and walking and cycling facilities. It also intends to help local authorities make decisions that work for their entire communities, offering choices for diverse groups and listening to a wider range of voices in the urban planning system. The NPS-UD will be supported through the wider UGA work by: • new tools for infrastructure funding and financing • investment in modern transport systems • a stronger partnership between central/local government and iwi, hapū and communities. " That is all very well but for this to happen the NPS-UD must recognise: 1) Human Geographies need to be incorporated into every aspect of the urban environment. We are great at building physical monoliths but those monoliths are often pretty crap in the human experience. So you need to work out how the human experience the human geographies are going to work (which brings me to Point 2). 2) It is all very well investing in modern transport systems but does the accompanying land use support it. Transit does not work well with single use zoning (that tends to contribute to sprawl as well) as well as being expensive to support. If Investment is to be done on modern transport system then: 2a): The Human experience or Human Geographies must be at the front of mind of any investment decision 2b) To do this multi-use zones need to be codified into District Plans with a Rapid Transit corridor is either there or to be set down for construction. That is only multi-use zones should be used with 800m of a Rapid Transit Corridor (the only time single use zoning is used is when the RTN runs through a heavy industry zoned area). Multi use zones not only allow for affordable housing but also greater amenity backed by viable transit systems. This is because multi use zoning will often stack residential, commercial and civic infrastructure together to allow people to walk for their basic amenities while providing the density to make rapid transit viable if they need to travel further abroad in a city. I went into further detail in a presentation I gave to the Auckland Council Planning Committee in October 2018. You can see that presentation here: https://voakl.net/2018/10/03/affordable-housing-a-presentation-on-typology-and-how-we-can-not-forget-transit-in-the-affordability-equation/ 3) Financing. There is no need for new tools as they are nothing but clever bean counting win which the resident still ends up paying more than if the State Balance Sheet was used to fund infrastructure. The Government can borrow money at the lowest interest rates around (as of this submission the Ten Year Bond Rate was below 1%) and if need be loan it...
to Local Government to get the infrastructure built (if Central Gov does not build it themselves). This is the only true way in financing City building not these SPV's or other methods that are more expensive in the long run. 4) The NPS-UD MUST recognise that with our larger cities (Auckland, Wellington and Christchurch) that the City is not one big homogeneous urban mass but often diverse or heterogeneous sub regions each unique to the other and would require different planning approaches. An example is South Auckland to the rest of the Auckland given the South's and Auckland's differing urban geographies. The NPS will need to recognise this as one size all will not work to the point if it was tried it would promote hostilities from communities and businesses in the individual sub regions. More on this https://voakl.net/2018/10/01/heterogeneous-mixed-housing-zoning-pepper-potting-vs-homogeneous-housing-zoning-typology-a-geography-recount-on-housing-history-in-the-20th-and-21st-century/

Clause
Are there other tools under the RMA, other legislation or non-statutory tools that would be more effective in achieving a quality urban environment and making room for growth?

Notes
Yes in cooperation with the NPS-UD. The Auckland Spatial Plan (or Auckland Plan for short) is a document required by the Local Government Act (Auckland) is required to be produced and updated by Auckland Council every so often. The Auckland Plan basically maps out where Auckland is and where it wants to go in both Physical and Human Geographies. The Auckland Plan is technically the Master Spatial Planning Document that heavily influences the Unitary Plan, the Long Term Plans and will guide transport planning documents like the NLTF and GPS (if Government is paying attention). The Auckland Plan should be codified as the master document that influences (or rather dictates) all other planning documents. These Spatial Plans should also be a requirement for all Cities in New Zealand using standardised language and objectives.

Clause
Question 2. Do you support the approach of targeting the most directive policies to our largest and fastest growing urban environments? Why/why not?

Position
Somewhat

Notes
Yes and no. Yes our five fastest urban areas should be targeted in the NPS-UD but no in that the other nine centres mentioned on page 20 are excluded. We should have a two tier system given how quickly things can change especially if one of the Tier 2 urban areas are next door neighbours to a Tier 1 urban area (that the NPS-UD covers). So if Tier 1 you should be required to produce a Spatial Plan and a Unitary Plan if Tier 2 you should be required to produce at least a Spatial Plan that guides current growth and any advent growth if there is a sudden up surge due to too much pressure on a neighbouring Tier 1 urban centre.

Clause
Do you support the approach used to determine which local authorities are categorised as major urban centres? Why/why not?

Notes
Yes

Clause
Can you suggest any alternative approaches for targeting the policies in the NPS-UD?

Notes
No

Clause
Question 3. Do you support the proposed changes to FDSs overall? If not, what would you suggest doing differently?

Position
Yes

Notes
"An integrated spatial planning framework There is no consistent framework for spatial planning in New Zealand; only Auckland Council is legally required to prepare a spatial plan. There is no framework for how spatial planning should interact with planning under the RMA, and until recently central government has generally not been involved as a key partner in local spatial plans. These factors have resulted in spatial plans of variable quality." The Auckland Spatial Plan (Auckland Plan) as previously mentioned is treated as a Master document that influences all other documents under it bringing consistency to the Unitary Plan and Long Term Plans. What was done with Auckland by having to create the Auckland Plan should be replicated in the Tier One and Two urban centres with the Tier Ones standardising their zones to the same as the Auckland Unitary Plan. The Spatial Plan should be codified into the NPS-UD making it a core requirement for Councils and that such Spatial Plans dictate District Plans and influence Long Term Plans. That said the NPS-UD should also codify the need for Central Government to create Inter-Regional Spatial Plans when a Tier 1 urban centre is neighbours with another Tier 1 urban centre (Auckland-Hamilton, Hamilton-Tauranga) while using discretion to produce an Inter-Regional Spatial Plan is a Tier 1 urban centre is neighbours with a Tier 2. As in how Spatial and Inter-Regional Spatial Plans should be written the Auckland Plan and the Panukau Transform Manukau Frame Work Plan offer good examples on how those Spatial and Inter-Regional Spatial Plans should be written for Tier 1 urban centres. I mention Transform Manukau as several challenges, opportunities, moves and goals recognise the inter-regional connections between Manukau itself, Hamilton and Tauranga thus allowing for integrated approaches to planning and investments between the respective centres. Going through the What it would look like in the NPS-UD and making changes The following draft objectives and policies indicate how this could be reflected in the NPS-UD. Proposed objective/policy O1: To ensure long-term
strategic planning, reflected in planning documents, provides for: a) integrated land use and infrastructure b) quality urban environments (recognising Human and Physical Geographies) Notes • Applies to all urban environments • Applies immediately • Amended NPS-UDC 2016 objective OD1 P1A: Local authorities must, every six years (or two Long Term Plan cycles), prepare or update a Spatial Plan. A Spatial Plan is to demonstrate, for the medium and long term, how the local authority will: a) achieve quality urban environments in its existing and future urban areas and b) meet residential development capacity bottom lines c) allocate development capacity across existing and future urban areas d) • Applies to major urban centres (all others encouraged to give effect to these policies) • Drafted in time to inform relevant LTPs • Amended NPS-UDC 2016 policies PC12, PC14c P1A2: Central Government must every six years produce or update an Inter-Regional Spatial Plan between two Tier One Urban Centres. The Inter-Regional Plan is to demonstrate a) The interconnection between the respective Spatial Plans from the two neighbouring Tier One Urban Centres b) Demonstrate efficient and environmental friendly land transport connections between the two Tier One Urban Centres that support the movement of people and freight between the two centres. c) Demonstrate the capability of Satellite towns with supporting amenities and industries along the transport connections between the Tier One Urban Centres. d) Multi Use Residential and Commercial Zones are compulsory for any urban area within 800m of a Rapid Transit Station and highly recommended (although at lower densities) within 1.5km of the same RTN Station when feeder routes including buses or cycling are present. Industry is still expected to be a Single Use zone P1B: A separate Spatial Plan and/or Inter-Regional Spatial Plan is to be published and updated every 6 years • Applies to major urban centres (Tier Ones) (all others encouraged to give effect to these policies) • Drafted in time to inform relevant LTPs • Amended NPS-UDC 2016 policies PC14 P1C: Every Spatial Plan and Inter-Regional Spatial Plan must be informed by: a) the most recent HBA for the major urban centre b) analysis of costs and benefits of different spatial scenarios for accommodating growth c) scenario testing of different growth rates to ensure strategy is robust d) the long-term plans and infrastructure strategies required under the Local Government Act 2002, and any other relevant strategies, plans and documents e) iwi and hapū resource management issues of concern/significance for the urban environment, including those expressed in any relevant planning document recognised by an iwi authority Every Spatial Plan and Inter-Regional Spatial Plan must consider other national direction. • Applies to major urban centres (all others encouraged to give effect to these policies) • Drafted in time to inform relevant LTPs • Amended NPS-UDC 2016 policies PC12, PC13c, PC14b P1D: Every Spatial Plan and Inter-Regional Spatial Plan must identify: a) areas where evidence shows urban development must be avoided (So Prohibited Activity under the RMA?) b) future infrastructure corridors/locations b1) Location of current or future Satellites in the Inter-Regional Spatial Plan c) broad locations for long-term feasible residential and commercial and industrial development capacity d) broad locations for residential intensification that contributes to quality urban environments (preferably within up to 1.5km of a Rapid Transit corridor or station) e) the development physical and civic infrastructure and other infrastructure needed to support growth f) how to provide for commercial and industrial land (remembering multi use zoning is compulsory for an area within 800m of a transit station except an industrial area) g) how hapū and whānau aspirations for urban development on whenua Māori within their rohe will be taken into account h) how the strategy will be implemented. This must include: i. estimates of local authority contributions to development infrastructure funding, and the indicative timing and sequencing ii. financing gaps or other risks to the delivery of development infrastructure needs for the medium and long-term, and options for resolving this iii. processes for working with land owners, developers and infrastructure providers to implement the FDS. • Applies to major urban centres (all others encouraged to give effect to these policies) • Drafted in time to inform relevant LTPs • New policy P1E: In addition to the policies P10A–P10C, when local authorities and Central Government are developing or updating their respective Spatial Plans for a major urban centre they must: a) engage on their Spatial Plans with neighbouring (or in the case of central Government all) local authorities where there are significant connections between infrastructure or communities b) work with relevant central government agencies c) give local iwi and hapū opportunities to identify the resource management issues of concern/significance to them relating to urban environments. • Applies to major urban centres (all others encouraged to give effect to these policies) • Drafted in time to inform relevant LTPs • New policy P1F: When developing or updating an Spatial Plan and Inter-Regional Spatial Plan, local authorities and/or Central Government: a) must undertake a consultation process that complies with either Part 6 of the Local Government Act 2002 or Schedule 1 of the Act b) may combine that process with any other consultation process occurring on another related matter, such as the documents referred to in [P2H]. • Applies to major urban centres (all others encouraged to give effect to these policies) • Drafted in time to inform relevant LTPs • Amended NPS-UDC 2016 policy PC14a P1G: Local authorities and/or Central Government must have particular regard for their medium to long-term development capacity allocation as set out in Spatial Plans and Inter-Regional Spatial Plans, when preparing changes to regional policy statements, regional plans, and district plans. • Applies to major urban centres (all others encouraged to give effect to these policies) • Drafted in time to inform relevant LTPs • New policy P1H: Local authorities of Tier One Urban Centres and Central Government must use Spatial Plans and Inter-Regional Spatial Plans to inform the relevant long-term plans and infrastructure strategies required under the Local Government Act 2002, the Regional Land Transport Plans under the Land Transport Management Act 2003, and any other relevant strategies, plans and documents. [See P2F] • Applies to major urban centres (all others encouraged to give effect to these policies) • Drafted in time to inform relevant LTPs • New policy P1I: Local authorities and Central Government must update their Spatial Plans and Inter-Regional Spatial Plans every six years, in time to inform relevant long-term plans and infrastructure strategies required under the Local Government Act 2002, and Regional Land Transport Plans required under the Land Transport Management Act 2003. • Applies to major urban centres (all others encouraged to give effect to these policies) • Drafted in time to inform relevant LTPs • New policy

Clause
Do you support the approach of only requiring major urban centres to undertake an FDS? Would there be benefits of requiring other local authorities to undertake a strategic planning process?

Notes
Yes the Tier One Urban Centres should be required to do Spatial Plans while Central Government must produce Inter Regional Spatial Plans for two neighbouring Tier One Urban Centres given that both Centre will have high amounts of people and freight movement as well as good opportunities to develop and support Satellite Towns.

Clause
What impact will the proposed timing of the FDS have on statutory and other planning processes? In what ways could the timing be improved?

Notes
Make the update to any Spatial Plan and Inter-Regional Spatial Plan 6 years or two LTP cycles. That way Councils and Government are not spending a year writing the Plan, a year consulting, a year executing it and then start again. 6 year cycles allow better use of resources and give better certainly in Planning while still being nimble enough to adapt to any changes that other data like the Census might show.

Clause

Question 4. Do you support the proposed approach of the NPS-UD providing national level direction about the features of a quality urban environment? Why/why not?

Position
No

Notes
I do not support what is set in Question Four as 1) No definition of (quality) urban environment 2) No reference to how Spatial Plans and Inter Regional Spatial Plans should be written to influence District Plans and LTP's so that quality urban environments are produced, maintained and enhanced 3) O3 mentions minimisation of negative impacts on the urban environment. As much as I have made it clear that the Physical and Human Geographies need to be mentioned (as Human Geographies are often left out) in O3's case Physical Geographies are not mentioned and should be 4) In mentioning (quality) Urban Environments the NPS-UD there is nothing mentioning the diverse or heterogeneous nature of said urban environments. Without this mentioning it can be and in Auckland Council's case until recently will be determined that an urban environment is a homogeneous geographic form and Planning instruments as such will follow this (thus skewering investment via the LTP's). The NPS-UD must make specific mention that all urban environments even inside a City like Auckland are heterogeneous and can be divided up into sub regions. That is all Spatial Plans, Inter Regional Spatial Plans, District Plans and LTPs must recognise the diversity of an urban area through its sub-regions. The NPS-UD and Spatial Plans would guide planning and development decisions recognising no sub region is the same as the other. For example the Auckland and Manukau sub regions (Central and South Auckland) are larger in population size than both Wellington and Christchurch would be urban geographically diverse (one size all planning would not work). 5) P2A (d) in regards on the adverse impacts of land and development markets seems to not recognise the importance or the operation of industrial land verses commercial and residential land. This stems from as land use pressures intensifies the price and amenity of land value goes up. When such pressures are too high industry decamps and area and will move to an urban fringe where pressures are not so high. In it's place is residential and commercial in a process otherwise known as Gentrification. The NPS-UD and all Spatial Plans must recognise this fact and that preserving industrial land would be a folly. In saying that preparations must be done to make sure industrial land especially Greenfield industrial land is always available in 15 year pipelines. See https://voakl.net/2019/02/11/is-urban-sprawl-organic/ Changes to the Objective and Policies as per Page 27 O2: To enable quality urban environments that make it possible for all people, whānau, communities and future generations to provide for their well-being, including by: a) offering people equitable access to a choice of homes that meet their demands, jobs, opportunities for social interaction, high-quality diverse services and open space a2) that in doing so the NPS-UD recognises community or citizen led Spatial Planning and Inter-Regional Spatial Planning is to be at the forefront in developments and updates of such plans. Community Participation in the creation and updating of the Spatial and Inter-Regional Spatial Plans is to be at the Empowerment Level per the IAP2 guidelines. b) providing businesses with economies of scale, with access to many consumers, suppliers, skilled people and sources of innovation that is recognised at minimum in all Inter-Regional Spatial Plans and at optimum Spatial and District Plans c) using land, energy and infrastructure efficiently while recognising diverse sub-regions in a Tier 1 Urban Centre d) responding to changing needs and conditions while again recognising both the diversity of sub-regions and the fact industry will constantly move causing positive and negative consequences in a City or Region. O3: To enable development in locations and in ways that maximise its positive contribution to, and minimise its negative impact on, quality urban environments - while again recognising both the diversity of sub-regions and the fact industry will constantly move causing positive and negative consequences in a City or Region. P2A: When making planning decisions that affect urban development, and the way and rate at which development capacity is provided, local authorities must have particular regard to: a) enabling a range of dwelling types and locations, working environments and business locations b) limiting as much as possible adverse impacts on the competitive operation of land and development markets c) while again recognising both the diversity of sub-regions and the fact industry will constantly move causing positive and negative consequences in a City or Region. When making decisions on consent applications that affect urban development, and the way and rate at which development capacity is taken up, decision-makers must have regard to the need, consistent with this NPS, to: c) provide a range of dwelling types and locations, working environments and business locations d) limit as much as possible the adverse impacts on the competitive operation of land and development markets while again recognising both the diversity of sub-regions and the fact industry will constantly move causing positive and negative consequences in a City or Region. P2B: When making or updating policies, plans and strategies, local authorities must have particular regard to: a) the positive impacts of urban development to contribute to a quality urban environment as described in O2 b) the benefits and costs of urban development at national, inter-regional, regional and district scale, as well as locally b2) while again recognising both the diversity of sub-regions and the fact industry will constantly move causing positive and negative consequences in a City or Region. When making decisions on consent applications, decision-makers must have regard to: c) the positive impacts of urban development to contribute to a quality urban environment as described in O2 and d) the benefits and costs of urban development at national, inter-regional, regional and district scale, as well as locally e) while again recognising both the diversity of sub-regions and the fact industry will constantly move causing positive and negative consequences in a City or Region.

Clause

Do you support the features of a quality urban environment stated in draft objective O2? Why/why not? (see discussion document, page 26)
Notes
See above where O2 has been amended

Clause
What impacts do you think the draft objectives O2-O3 and policies P2A-P2B will have on decision-making (see discussion document, page 26)?

Notes
See above where the respective objectives and policies are amended

Clause
Question 5. Do you support the inclusion of proposals to clarify that amenity values are diverse and change over time? Why/why not?

Position
Somewhat

Notes
This is a fundamental flaw of the RMA in that it recognises Physical Geographies (so views or vegetation) and is deaf to Human Geographies when it comes to amenities. In Urban Geography and more to the point Geography as a whole amenities can be divided into these categories 1) Physical Amenities; vegetation, views, rivers, coasts etc as already covered in the RMA 2) Civic Infrastructure (or social amenities): these include - Open Space (parks etc), Schools, Hospitals, Fire, Police, Libraries, Tertiary Institutes, Community Centres and Places of Worship 3) Transit amenities: while the physical rail tracks or bus lines are transit infrastructure the station, stops and interchanges plus everything one might have inside them (wayfinding, basic retail, toilets, showers, bike parking, ticket facilities etc) are Transit amenities 4) Urban Amenities: these are basic commercial amenities needed as minimum to support an area. Those commercial amenities would include facilities to provide basic amenities such as bread, milk, nappies, coffee, preferably within walking distance of a population or larger commercial or industrial area. These Urban Amenities would be facilitated through multi-use zones (e.g Centres) or as attachment to a transit or civic infrastructure/facility Thus the NPS-UD must include the recognition of the four amenities and that: 1) All Spatial and Inter-Regional Spatial Plans recognise the four above mentioned amenities 2) All Spatial and Inter-Regional Spatial Plans influence Regional, District, Unitary and Long Term Plans in the facilitation of the four amenity groups as part of supporting diverse/heterogeneous urban environments 2a) "supporting diverse/heterogeneous urban environments" also means recognition of a Tier 1 Urban Centre having diverse/heterogeneous sub-regions Changes to the Objectives and Policies O4: Urban environments provide for the diverse and changing amenity values of individuals and communities. Amenities include (but not limited to): a) Physical Amenities b) Civic Infrastructure c) Transit Amenities d) Commercial Amenities P3A: In making planning and consent decisions, decision-makers must recognise that amenity values: a) vary among individuals, communities and sub-regions b) change over time.

Clause
Do you think these proposals will help to address the use of amenity to protect the status quo?

Notes
Providing that 1) The four amenities above are recognised 2) Amenities, communities, sub regions, and cities evolve over time 3) Plans are updated at least every decade Then the proposals should not be used to protect the status quo but also not make an area worse than it is nor be used to displace communities (gentrification)

Clause
Can you identify any negative consequences that might result from the proposed objective and policies on amenity?

Notes
NIMBYs could use the Amenities clause to object to urban development even when such urban development would would enhance those amenities (or provide even new amenities). P3A b must be reinforced that change does happen over time especially with deindustrialisation or gentrification. How the Plans manage it is the larger question.

Clause
Can you suggest alternative ways to address urban amenity through a national policy statement?

Notes
As above the states in Geography amenities can be divided into four categories. The NPS-UD must recognise this and state that Spatial Plans and Inter-Regional Spatial Plans must both recognise and facilitate the four classes of amenities. The NPS again with amenity given O4 and P3A a must recognise that an urban area will have diverse sub-regions. Thus through the NPS all Spatial Plans and Inter-Regional Spatial Plans must recognise those sub regions and that all Plans under the Spatial Plans facilitate amenities as need be by each sub-region (rather than region as a whole). To best facilitate and support amenities via an NPS the environment must be right for them as well especially in terms of monetary cost. Multi-use zoning, the removal of Minimum Parking Requirements, provision of transit infrastructure, the provision of intensification within either 800 or 1500m of a transit station/stop, recognition Industry will move et al are some of the provisions needed to support amenity both in the NPS and Spatial Plans.

Clause
Question 6. Do you support the addition of direction to provide development capacity that is both feasible and likely to be taken up? Will this result in development opportunities that more accurately reflect demand? Why/why not? (see questions A1 - A5 at
**Position**
No

**Notes**
O5 and P4A are of no use to Local Government Authorities, their CCOs as well as businesses and communities if the Central Government itself does not 1) Produce Long Term Plans in line with Local Government Authorities and their Spatial Plans (as well as Government's own Inter Regional Spatial Plans) 2) Through those LTP's the upfront funding for infrastructure to be provided ahead of any urban development whether it is residential, commercial or industrial. That is physical, transit and Civic infrastructure must be in place before any Greenfield urban development is to take place and that existing said infrastructure has adequate capacity for any Brownfield urban developments. It is on the onus of Government to make sure physical, transit and civic infrastructure has the capacity for Brownfield urban development and no Brownfield development is either hindered by physical, transit and civic infrastructure. 3) With regards to (2) LTPs and Spatial Plans are of importance and why they need to be updated every six years. So on one hand Spatial Plans can identify development capacity and likely demand but for development to happen the infrastructure and amenities must be in place first. For more see: https://voaki.net/2019/08/08/council-and-central-government-still-need-to-learn-the-japanese-technique-of-building-infrastructure-ahead-of-any-developments-in-southern-auckland/

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**Clause**

**Question 7.** Do you support proposals requiring objectives, policies, rules, and assessment criteria to enable the development anticipated by the zone description? Why/why not?

**Position**
Yes

**Notes**
It sounds like you are trying to standardise District Plans with the Auckland Unitary Plan which already requires objectives, policies, rules, and assessment criteria to enable the development anticipated by the zone description. If so then I do fully support this being standardised based on the Auckland Unitary Plan for the rest of the country. NOT the National Planning Standards framework the NPS's depth of different zones are (unless the NPlanning Standards are similarly in line with what the AUP already states) inadequate for the heterogeneous nature of a tier one urban centre like Auckland (hence why the Unitary Plan has City Centre, Metropolitan, Town, Local and Neighbourhood Centres (note: I see on page 27 and 28 that the issue around the Metropolitan Centre is addressed https://www.mfe.govt.nz/sites/default/files/media/RMA/2G-zone-framework-standard.pdf if this is carried into the NPlanning Standards then objections are dropped in regards to the standardisation of zones processes). That said the objectives, policies, rules, and assessment criteria to enable the development anticipated by the zone description must give effect to any Spatial or Inter Regional Spatial Plans operative.

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**Clause**

Do you think requiring zone descriptions in district plans will be useful in planning documents for articulating what outcomes communities can expect for their urban environment? Why/why not?

**Notes**
Yes Again this would repeating what is already present in the Auckland Unitary Plan rather than what is proposed in the National Planning Standards (unless the NPlanning Standards are similarly in line with what the AUP already states) The Auckland Unitary Plan has its Residential, Business, Open Space, and Special (all other zones) that have their description attached. Those descriptions make it very easy to work out what can I expect from say a Metropolitan Centre or a Mixed Housing Urban Zone. Examples from the AUP: H5. Residential – Mixed Housing Urban Zone H5.1. Zone description The Residential – Mixed Housing Urban Zone is a reasonably high-intensity zone enabling a greater intensity of development than previously provided for. Over time, the appearance of neighbourhoods within this zone will change, with development typically up to three storeys in a variety of sizes and forms, including detached dwellings, terrace housing and low-rise apartments. This supports increasing the capacity and choice of housing within neighbourhoods as well as promoting walkable neighbourhoods, fostering a sense of community and increasing the vitality of centres. Up to three dwellings are permitted as of right subject to compliance with the standards. This is to ensure a quality outcome for adjoining site and the neighbourhood, as well as residents within the development site. Resource consent is required for four or more dwellings and for other specified buildings in order to: • achieve the planned urban built character of the zone; • achieve attractive and safe streets and public open spaces; • manage the effects of development on adjoining neighbouring sites, including visual amenity, privacy and access to daylight and sunlight; and • achieve high quality on-site living environments. The resource consent requirements enable the design and layout of the development to be assessed; recognising that the need to achieve quality design is important as the scale of development increases. H5.2. Objectives (1) Land near the Business – Metropolitan Centre Zone and the Business – Town Centre Zone, high-density residential areas and close to the public transport network is efficiently used for higher density residential living and to provide urban living that increases housing capacity and choice and access to public transport. (2) Development is in keeping with the neighbour's planned urban built character of predominantly three-storey buildings, in a variety of forms and surrounded by open space. (3) Development provides quality on-site residential amenity for residents and adjoining sites and the street. (4) Non-residential activities provide for the community’s social, economic and cultural well-being, while being compatible with the scale and intensity of development anticipated by the zone so as to contribute to the amenity of the neighbourhood. H5. Residential – Mixed Housing Urban Zone H5.1. Zone description The Residential – Mixed Housing Urban Zone is a reasonably high-intensity zone enabling a greater intensity of development than previously provided for. Over time, the appearance of neighbourhoods within this zone will change, with development typically up to three storeys in a variety of sizes and forms, including detached dwellings, terrace housing and low-rise apartments. This supports increasing the capacity and choice of housing within neighbourhoods as well as promoting walkable neighbourhoods, fostering a sense of community and increasing the vitality of centres. Up to three dwellings are permitted as of right subject to compliance with the standards. This is to ensure a quality outcome for adjoining site and the neighbourhood, as well as residents within the development site. Resource consent is required for four or more dwellings and for other specified buildings in order to: •
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Clause
Do you think that amenity values should be articulated in this zone description? Why/why not?

Notes
If Amenity values are in the Spatial Plans then they should be carried over into the Zone Description as well. The Unitary Plan does a good basic job at this while the Auckland Spatial Plan slightly better. More can be done though to articulate and codify amenity values into Zone descriptions (by amenity this also includes Civic Infrastructure).

Clause
Question 8. Do you support policies to enable intensification in the locations where its benefits can best be achieved? Why/why not? (for more detail on the timing for these policies see discussion document, page 53)

Position
Yes

Notes
P6A needs to be codified in both Spatial Plans and District Plans (Unitary Plan for example) so the two are lined up together when delivering Brownfield and Greenfield developments. I would like to reinforce my support for "Higher-density living should not just be provided for in existing urban environments. Greenfield development should also provide opportunities for higher-density housing, especially where there is, or is intended to be, good access to jobs, and proximity to public and active transport links or town centres." (Page 36) However, the term intended to be needs to be replaced with must have for any Greenfield developments. To do this signifies again the need for Spatial Plans to recognise both the role of Greenfield development and the requirements for Future Urban Zoned areas to have all their infrastructure including Civic Infrastructure in place before the FUZ is flipped to a live Urban zone and development takes place.

Clause
What impact will these policies have on achieving higher densities in urban environments?

Notes
Make it rather clear intensification is a must especially in proximity to transit nodes and corridors as well as employment centres no matter if Greenfield or Brownfield developments,

Clause
What option/s do you prefer for prescribing locations for intensification in major urban centres? Why?

Position
Option 2 (the prescriptive approach)

Notes
1) 800m is the universal or international standard for walk up catchments when working out a higher density area from a transit stop. That said 200, 400 and 1.5km catchments are also used in larger urban areas as well to allow scaling back to the surrounding urban or suburban area. So how it would work is Rapid Transit Station Highest available densities within 200m of said RTN station (so unlimited density and height) (City Centre and Metropolitan Centre areas only) Highest available densities but height restrictions can be applied within 400m of said RTN station (applies to business and residential zones/centres) High
developments could be done more efficiently and cheaply as well. As for those who benefit? Value Capture Taxes.

cheaply (economies of scale and the face the State can get the lowest interest rates on its borrowing) but subsequent upfront before a development was to start in place of development contributions not only could infrastructure be provided more cheaply (economies of scale and the face the State can get the lowest interest rates on its borrowing) but subsequent developments could be done more efficiently and cheaply as well. As for those who benefit? Value Capture Taxes.

Notes

opportunities?

To what extent should developers be required to meet the costs of development, including the costs of infrastructure and wider impacts on network infrastructure, and environmental and social costs (recognising that these are likely to be passed on to future homeowners/beneficiaries of the development)? What impacts will this have on the uptake of development opportunities?

Notes

Development Contributions are clumsy and do not allow proactive placement of infrastructure ahead of development compared to the State using its Balance Sheet to provide the infrastructure upfront prior. If the State was to provide all infrastructure upfront before a development was to start in place of development contributions not only could infrastructure be provided more cheaply (economies of scale and the face the State can get the lowest interest rates on its borrowing) but subsequent developments could be done more efficiently and cheaply as well. As for those who benefit? Value Capture Taxes.
Clause
What improvements could be made to this policy to make development more responsive to demand in suitable locations beyond areas already identified for urban development?

Notes
N/A

Clause
Question 10. Do you support limiting the ability for local authorities in major urban centres to regulate the number of car parks required for development? Why/why not?

Position
Yes

Notes
Minimum Parking Requirements have perverted the Planning system and Urban Geographies by 1) Not allowing the market to determine the level of parking one might need for a residential or commercial site 2) Caused over supply parking allowing highly inefficient land use, induced demand from driving, lowering amenity value of the immediate surrounding area and making mixed use developments harder due to interpreting often different regulations for residential, commercial retail, commercial service and office 3) Even though the RMA states objections to a Resource Consent based on trade competition grounds is illegal large retailers who use large format retail will use Minimum Parking Rules as an anti-competitive measure to shut out smaller independent retailers given the cost of a car park in a high amenity area is at a minimum $60,000/per park. The absence of Parking Minimums does not prevent large retailers building as many car parks as they need or want so why do they need Minimum Parking Requirements 4) Again distorting the market forces through induced demand that has wider impacts such as the viability of transit and active mode transportation Thus the NPS-UD should forbid parking minimums in any District and Regional Plans especially as other pieces of legislation or Bills like the Zero Carbon Act (currently a Bill) would contradict the need for such minimums. That said only Minimum Parking Requirements should be banned not parking regulations full stop. That is Local Authorities should be allowed if not encouraged especially in City Centre, Metropolitan Centre or areas within 1.5km of a Rapid Transit Station to impose Parking MAXIMUMS. The reason for Parking Maximums (in such locations mentioned above) is that owing to high transit or active mode facilities it might be prudent to apply a maximum as so not to cause a situation as pointed out in (2) and (4). If Parking Minimums are to be removed and Parking Maximums to be allowed other mechanisms such as pricing on street parking, following Japan in that no on street parking is allowed in some areas, and making sure transit systems are properly funded and frequent enough must be in place as well. Otherwise there is no point curtailing parking if the alternatives such as transit and cycling infrastructure is not provided at all or even properly.

Clause
Which proposed option could best contribute to achieving quality urban environments?

Position
Option 2: removing the ability for local authorities to set minimum car park requirements

Notes
Despite what large retailers might say about Free Parking, free parking is NEVER free parking as mentioned in this post that quoted the NZ Initiative and now Associate Minister Julie Ann Genter: https://voakl.net/2013/11/27/free-parking-is-not-free-parking/

Clause
What would be the impact of removing car park minimums in just high- and medium- density, commercial, residential and mixed use areas, compared with all areas of a major urban centre?

Notes
It would have those like large retailers trying to trigger Private Plan Changes via the Environment Court to force Councils to rezone areas that are “high- and medium- density, commercial, residential and mixed use areas” into alternative zones that might have parking minimums. It also does not address Industrial Zones particularly Light Industry where parking policy can be haphazard. For uniformity across the entire urban area of a City like Auckland it is best that the removing of car park minimums be applied across all urban zones whether it be single use, multi-use, residential, commercial or industrial. The uniformity makes the planning processes more efficient via consistency and there is nothing stopping a residential or even commercial developer providing parking for their developments. What removing the minimums does is remove market and urban geography distortions as well as parking being used as anti trade competition by large retailers. If the entire urban area is to have parking minimums removed it does mean a Council and its transport authority will need to be more proactive with pricing mechanisms and proper provision of alternative transport modes. But that is not covered nor the fault of the NPS-UD but rather the Councils themselves.

Clause
How would the 18 month implementation timeframe impact on your planning processes?

Notes
Too slow Needs to be immediate and applied immediately to all District Plans including the Auckland Unitary Plan.

Clause
What support should be considered to assist local authorities when removing the requirement to provide car parking to ensure
the ongoing management of car parking resources?

Notes
1) Better funding mechanisms towards transit investment and operations (remove the Farebox Recovery Ratio) 2) All transit authorities to be developers in order to drive better Transit Orientated Development outcomes as well as driving non farebox revenue to support transit just as Japan does 3) All Councils to set their own parking fines and on street parking permit prices

 Clause
Question 11. Do you think that central government should consider more directive intervention in local authority plans?

Position
Somewhat

Notes
In standardising planning provisions that enable more density and variety across all tier 1 and 2 urban areas the Government should intervene in Council District Plans. The Auckland Unitary Plan and Hamilton City Plan are good examples of allowing or rather enabling more density and variety and should be in place across all tier 1 and 2 urban areas regardless of zones (given duplexes can and should be allowed on Low Density residential areas). Minor Additional Dwellings should be as of right or a Permitted Activity across all residential zones as they can offer very quick fix in accommodation shortages while larger urban developments are under planning and construction.

 Clause
Which rules (or types of rules) are unnecessarily constraining urban development?

Notes
1) Height restrictions in Metropolitan Centre zones. Auckland Council set them to 18 storeys despite evidence that such restrictions can add an extra $30k to a development (pg. 43 of the Planning for Successful Cities document) and they had unlimited height before (but did have overlays in place for instances like a flight path)) Height Restrictions in the Metro Zones can be removed. 2) Site Coverage Rules in all high density zones. To get best development outcomes in these land parcels site coverage rules should not be in place. To compensate from storm water run off it can be added that the development needs to provide their own run off detention facilities before it enters the storm water system. Given storm water is good for grey water uses detaining such storm water could reduce the fresh water usage of a said development placing less pressure on existing fresh water infrastructure and sources. 3) Height to boundary ratios in medium and high density areas BUT ONLY if said development is to the south or south west of an an existing lower density form of residential. 4) Minimum floor sizing in non apartments. I can understand minimum floor sizing is required in apartment complexes to prevent shoe-box style apartments. That said such requirement should be a Discretionary Activity and removed if the developer can provide excellent onsite amenities is provided.

 Clause
Can you identify provisions that are enabling higher density urban development in local authority plans that could be provided for either nationally or in particular zones or areas?

Notes
You already did on page 44 by identifying Hamilton and Auckland. Both provisions you have noted should be standardised across the rest of the nation.

 Clause
Question 12. Do you support requirements for all urban environments to assess demand and supply of development capacity, and monitor a range of market indicators? Why/why not?

Position
Yes

Notes
1) Allow to see of Spatial and Unitary Plans are working effectively enough and whether their periodic reviews can remain at 6-10 years or brought forward if an acute shortage of either residential or business land had arisen due to other circumstances (e.g surge in migration not predicted in standard modelling) 2) The instruments used to measure HBAs need to be robust enough to measure capacity of multi use zones like a City Centre or Metropolitan Centre zone given developments can be: a) single use (so solely residential or commercial) b) multi use (retail on the bottom and apartments on the top) c) Transit station on the bottom, multi use development above the station (otherwise known as a Transit Orientated Development)

 Clause
Question 14. Do you support amendments to existing NPS-UDC 2016 policies to include working with providers of development and other infrastructure, and local authorities cooperating to work with iwi/hapū?

Position
Yes

Notes
Just make sure that the physical, transit and social infrastructure is all in place before any Greenfield urban development happens and that existing infrastructure has enough capacity before the Brownfield development occurs please!

 Clause
Question 15. What impact will the proposed timing for implementation of policies have?
Notes
1) Parking Minimums policy to be implemented from go 2) Spatial Plans reviewed every six years or two Long Term Plan update cycles 3) Although separate, Auckland's Planning Standards to be implemented by 2025 not 2029 as mentioned on page 55.

Clause
Question 16. What kind of guidance or support do you think would help with the successful implementation of the proposed NPS-UD?
Notes
What you have there is good already but that same support needs to go out to the wider institutions and even communities. In the end Communities are the ones that wear the consequences of the implementation of the NPS-UD and if we are to follow the IAP2 Empowerment methodology support needs to be provided.

Clause
Question 17. Do you think there are potential areas of tension or confusion between any of these proposals and other national direction? If so, please identify these areas below and include any suggestions you have for addressing these issues.
Position
Unsure
Notes
If the language and primary outcomes are the same across all NPS's, National Planning Standards, NES's and Local Authority Spatial Plans then there should be no confusion or room for error.

Clause
Question 18. Do you think a national planning standard is needed to support the consistent implementation of proposals in this document? If so, please state which specific provisions you think could be delivered effectively using a national planning standard?
Position
Somewhat
Notes
All of Group C and D per page 67 of the Discussion Document Standardise the language, methodologies and outcomes even though cities are heterogeneous in nature as this will allow for District or Unitary Plans that are consistent while being in Plain English.

Clause
Question A1. Do you support the changes to the HBA policies overall? Are there specific proposals you do or do not support? What changes would you suggest?
Position
Yes
Notes
Yes. Some changes: AP13: signify what type: Centres, Mixed Use, Industrial, Commercial service including retail, commercial office, industrial, heavy industrial, single use zoning or multi use zoning which the aim of multi use developments AP14: as above AP15: as above

Clause
Question A3. Are the margins proposed in policies AP3 and AP12 appropriate, if not, what should you base alternative margins on? (for example, using different margins based on higher or lower rural-urban price differentials)
Position
Somewhat
Notes
For residential, commercial only and mixed use yes For light and heavy industry no. Short and medium term needs to be 50% and long term 100% which includes a neighbouring regions if an Inter-Regional Spatial Plan applies. This is owing to the long pipelines and stability industry needs especially when it is under competing land use pressures by expanding residential or commercial operations.

Clause
Question A4. How could these policies place a greater emphasis on ensuring enough development capacity at affordable prices?
Notes
By enforcing this rule: No major employment centre should be more than 30mins by transit from a residential area. Employment Centre is defined as: City Centre, Metropolitan Centre, Heavy Industrial Complex like Wiri or Southdown.

Clause
Question A5. Do you support the approach of targeting the HBA requirements only to major urban centres? Why/why not?
Position
Yes