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

Submission Reference no: 117

Nigel Gilkison, universalform...

Submitter Type: Planning/urban design professional
Source: Web Form
Overall Position: Support in part

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
Yes
Notes
I strongly support a NPS on Urban Development, with the aim of delivering quality urban environments. The primary emphasis needs to be on 'quality' and the delivery of growth needs to be carefully managed to be sustainable and environmentally, socially and culturally appropriate.

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
Developing 'best practice' design guidance from the best international and national examples to clearly and simply illustrate the best practice principles and solutions to deliver quality urban developments and future urban growth.

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, initially. I support this as an initial, short-term approach. This initial implementation for MUC's could be seen as a 'trial run' for policies which could eventually become utilised more widely. In the longer term, once these have been tested, there would be benefit in rolling out these policies throughout the country and eventually applying them to all urban areas, regardless of size. The universal principles of high quality urban design and sustainable strategies for intensified growth should apply to all urban environments.

Clause
Do you support the approach used to determine which local authorities are categorised as major urban centres? Why/why not?
Notes
Yes, but give other urban centres the opportunity to participate, if they wish to get on board - either at the beginning, or at a later date.

Clause
Can you suggest any alternative approaches for targeting the policies in the NPS-UD?
Notes
Not all policies proposed need to be implemented at one time. Include some flexibility/adaptability in the implementation system which could allow the possibility to add, alter or remove policies as required. This needs to be an on-going, continuous and
evolving discussion/debate which provides the best solutions, backed up by empirical evidence and ‘real-world’ examination and testing.

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

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
I support the approach of only requiring major urban centres to undertake an FDS, at least initially. There may prove to be benefit, in the longer term, of eventually rolling this out to be used for all TA’s, but test and refine the strategy first with MUC’s.

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
Yes
Notes
Yes, good to have consistent national direction and agreed guidance about what constitutes a ‘quality urban environment.’

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
Overall, it should promote positive, high quality urban planning outcomes. Not sure about the inclusion of the wording ‘providing businesses with economies of scale’ as this could be misinterpreted as encouraging only large scale businesses (eg big-box retailers), perhaps better to refer to businesses that are ‘well integrated’ or ‘well located’ to make use of the community that they serve. Encourage mixed use urban planning model which promotes a diversity of business types and sizes, which are well suited to serving their local environment.

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
Yes
Notes
Yes, with the caveat that this wording could be seen as favouring ‘change’. Change is not always positive. We should not be promoting ‘change for changes sake’, particularly when it comes to established social and cultural amenity values. Sometimes the best solution is the status quo. Perhaps use the word ‘evolve’ or add ‘may’ or ‘can’ (can [change over time]).

Clause
Do you think these proposals will help to address the use of amenity to protect the status quo?
Notes
As long as ‘change’ is not promoted as a necessity.

Clause
Can you identify any negative consequences that might result from the proposed objective and policies on amenity?
Notes
I would like to see more emphasis on the social, cultural and historical aspects/values of amenity, rather than just the ‘natural or physical qualities and characteristics’ (as described in the RMA), as amenity is not just about the physical (tangible) ‘places’ and ‘things’, it is also about the (intangible) ‘feelings’ and ‘stories’ which give meaning to these amenity spaces.

Clause
Can you suggest alternative ways to address urban amenity through a national policy statement?
Notes
Allowing ‘experimental placemaking’, where urban centres can create novel amenity areas and activities, which can be trialled, tested, studied and analysed, with the results shared with others.
### 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 the end of the form for more questions on policies for Housing and Business Development Capacity Assessments)

**Position**
Somewhat

**Notes**
We have to be careful not to let ‘future demand’ drive our development model. Future demand is speculative, not factual, and there is no guarantee that it will eventuate. Future growth must consider all possible scenarios - including the possibility of negative growth (for example in regional centres). By planning for all eventualities we ‘design in’ greater resilience to our planning strategy. The danger with this policy is that it will encourage local authorities to provide a great deal more development capacity than is required to meet demand (over supply) and then only the ‘easy’ options get developed, rather than the locations where additional development would be best placed. The ‘low hanging fruit’ will get picked first and this could encourage more urban sprawl and less efficient, lower quality urban expansion. This may encourage more ‘Greenfield’ development, rather than ‘Brownfield’ development. Brownfield development should almost always be favoured over Greenfield in any environmentally sustainable development strategy.

### 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**
Somewhat

**Notes**
It is unclear what the prescribed ‘zone descriptions’ will entail, so difficult to comment. There must be flexibility in the zone descriptions to allow for a range of mixed-use land uses and they need to be adaptable, but they should not solely respond to market demand - the focus should always be on providing quality, sustainable urban environments. Inflexible, mono-functional zoning will not provide for quality urban design outcomes.

### 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**
Possibly, but there must be flexibility in the zone descriptions to allow for a range of mixed-use land uses and they need to be adaptable, but they should not solely respond to market demand - the focus should always be on providing quality, sustainable urban environments.

### Clause
Do you think that amenity values should be articulated in this zone description? Why/why not?

**Notes**
Yes, there must be a wholistic approach to creating quality urban environments.

### 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**
Yes, where appropriately located around existing local centres with good (walkable) access to transport, services, and jobs, promoting ‘mixed-use’ developments which include local facilities, services and employment opportunities, as well as housing. No more ‘mono-functional’ zoning/planning. relax existing planning and land-use rules enabling and encouraging more diverse, mixed-use urban environments.

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

**Notes**
Positive impact - will encourage higher density infill development.

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

**Notes**
Both options have merits. Encouraging higher densities, as well as other complimentary uses (mixed-use developments) is positive, but it must fit integrate well with the local context, so can not be too prescriptive.
| Clause | If a prescriptive requirement is used, how should the density requirement be stated? Please provide a suggestion below (for example, 80 dwellings per hectare, or a minimum floor area per hectare). |
| Notes | Dwellings per Hectare. |

| Clause | What impact will directly inserting the policy to support intensification in particular locations through consenting decisions have? |
| Notes | Hugely positive impact - will encourage higher density infill development, which will increase overall density without having to release greenfield land and without having to supply new infrastructure to service it. Intensification within existing city limits is the most efficient, effective and sustainable approach to addressing the housing crisis (incidentally, not just in major urban centres, this should apply to all urban centres across the country). |

| Clause | Question 9. Do you support inclusion of a policy providing for plan changes for out of sequence greenfield development and/or greenfield development in locations not currently identified for development? |
| Position | No |
| Notes | I do not support the proposed inclusion of policy which encourages greenfield development, unless it is the only option available. Greenfield development should be actively discouraged. Greenfield locations are NOT where development is ‘most needed’. They may be where they are ‘most wanted’, but ‘want’ should not drive strategy or policy. |

| Clause | How could the example policy better enable quality urban development in greenfield areas (see discussion document, page 37)? |
| Notes | If it is the only option, then it should be undertaken as an exemplar of environmentally sustainable urban design, to the highest standards of international best practice. Refer the UK’s recent ‘Garden Villages/Towns’ scheme, as a positive example. |

| Clause | Are the criteria sufficiently robust to manage environmental effects to ensure a quality urban environment, while providing for this type of development? (see example policy in discussion document, page 37) |
| Notes | No, the requirements to allow greenfield developments need to go further that the standards required for infill developments within defined urban areas. |

| Clause | 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 | Developers should meet all associated costs of infrastructure to service new greenfield developments, including connections/links to existing infrastructure. |

| 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 | Only allow Greenfield development when no other brownfield development options are available, and then only if the highest environmental standards and urban design quality are achieved, including making these developments self-sufficient and self-contained communities providing all necessary services, jobs, facilities, open space, recreation and other amenity, as well as a variety of housing types and tenures, in a med-high density, quality urban environment. |

| 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 | I strongly support the principle of removing minimum parking requirements and encouraging reduced car usage, in favour of
other modes of transport (walking, cycling, public transport).

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

**Position**
Option 3: removing the ability for local authorities to set minimum car park requirements in areas providing for more intensive development.

**Notes**

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**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**
I think this strikes the right balance. We can still encourage and promote reduced car usage in low density areas and, if necessary, reduce parking requirements in these areas at a later date.

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

**Notes**
I have no problem with 18 month implementation timeframe

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

**Notes**
Parking provisions, minimum private open space requirements.

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**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**
in appropriate areas, allow greater flexibility or relaxation of planning provisions, if the developer is committed to providing a high quality, well designed, environmentally sustainable urban development (set some minimum benchmarks and if the developer agrees to meet these, then they get rewarded with less planning restrictions). Maybe look at this being controlled through negotiation with local Urban Design Panel, which has discretion to relax local District Plan rules?

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**Clause**
Should a minimum level of development for an individual site be provided across urban areas (for example, making up to three storeys of development a permitted activity across all residential zones)?

**Notes**
Yes - to encourage higher density development, particularly where they are on brownfield sites, include a mix of uses and are well located close to services, jobs, shops, facilities and transport links.

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**Clause**
Given the potential interactions with the range of rules that may exist within any given zone, how could the intent of more directive approaches be achieved?

**Notes**
By setting consistent national planning rules, rather than having different local District Plan rules. Allow flexibility for developers, and an easier/quicker route through planning process, if they make certain commitments to providing quality urban developments.

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<tr>
<th>Clause</th>
<th>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?</th>
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<tbody>
<tr>
<td>Position</td>
<td>Somewhat</td>
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<tr>
<td>Notes</td>
<td>Yes, but with the following caveat. We must be careful not to confuse ‘evidence’ with ‘speculation’. Whilst forecasting about future trends can be a useful tool in estimating expected future impacts and outcomes, it is no means incontrovertible ‘evidence’ that these things will eventuate. We only learn lessons from our past - we can not learn lessons from our future! Decision making should be based primarily on empirical evidence. Speculation about the future always include an inherent degree of uncertainty.</td>
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<tr>
<th>Clause</th>
<th>Question 13. Do you support inclusion of policies to improve how local government works with iwi, hapū and whānau to reflect their values and interests in urban planning? Why/why not?</th>
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<tbody>
<tr>
<td>Position</td>
<td>Yes</td>
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<tr>
<td>Notes</td>
<td>Yes, I strongly support the inclusion of policies to improve engagement and consultation with tangata whenua and local iwi, to seek improved ways of achieving better urban outcomes for Maori and for all other peoples.</td>
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<thead>
<tr>
<th>Clause</th>
<th>Do you think the proposals are an appropriate way to ensure urban development occurs in a way that takes into account iwi and hapū concerns?</th>
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<tbody>
<tr>
<td>Notes</td>
<td>Yes. Another option might be to require new developments (over a certain size threshold?) to go through an Urban Design Panel approval, which would have an iwi representative. Alternatively, set some nationally recognised guidelines to ensure urban developments incorporate issues significant to tangata whenua (eg Te Aranga design principles).</td>
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<tr>
<th>Clause</th>
<th>How do you think local authorities should be directed to engage with Māori who do not hold mana whenua over the urban environment they are currently living in?</th>
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<tr>
<td>Notes</td>
<td>Should be encouraged to engage with Maori as much as possible and include iwi in all strategic decision-making.</td>
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<thead>
<tr>
<th>Clause</th>
<th>What impacts do you think the proposed NPS will have on iwi, hapū and Māori?</th>
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<tbody>
<tr>
<td>Notes</td>
<td>Encourage greater engagement with iwi/hapu and require developments to incorporate issues important to tangata whenua.</td>
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<tr>
<th>Clause</th>
<th>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?</th>
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<tbody>
<tr>
<td>Position</td>
<td>Yes</td>
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<tr>
<td>Notes</td>
<td>I support the proposal to enable better cooperative working practices between local authorities and iwi/hapu, as well as enabling “coordinated and aligned planning decisions within and across local authority boundaries”.</td>
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<tr>
<th>Clause</th>
<th>Question 16. What kind of guidance or support do you think would help with the successful implementation of the proposed NPS-UD?</th>
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<td>Notes</td>
<td>‘Best practice’ design guidance. This can be adopted from the best international and national examples (eg Auckland Council’s Urban Design Manual). Include best practice guidance on local cultural design influences (eg Te Aranga principles); environmentally sensitive design, energy efficient and sustainable design and landscape design guidance of the natural environment within urban centres.</td>
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### 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.

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<tr>
<th>Position</th>
<th>Yes</th>
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**Notes**
The inclusion of Greenfield opportunities for growth goes against all current best practice urban design advice and it goes against all the other principles proposed in this consultation document. It will only deliver more unsustainable sprawl and will not reduce property prices. I agree with providing for growth 'up', but perhaps we could include a preference for growth 'in' (rather than 'out') - encouraging 'in' (infill) growth (densification and brownfield developments within existing urban boundaries).

### 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.

<table>
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<tr>
<th>Position</th>
<th>Yes</th>
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**Notes**
Strongly agree. All possible planning standards and urban design standards should be incorporated into national guidance, with only a few locally specific rules controlled by local District Plans (eg development contributions, provision of social housing, rubbish collection provisions, etc.)