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

Submission Reference no: 121

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Submitter Type: Planning/urban design professional
Source: Web Form
Overall Position: Neutral

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
No

Notes
The places with affordability issues are those with a constrained land supply (Auckland, Wellington and Queenstown) rather than necessarily being the fastest growing (eg Selwyn has affordable new housing - although a shortage of old housing). The greater Christchurch market is very different to other centres because land is affordable. There is an existing approach which is working and the case for intervention is not as strong.

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

Notes
The affordability issues in New Zealand are centred around Auckland and Wellington (and potentially Hamilton and Tauranga) which have constrained land supply. Other authorities do not and may not benefit from such a drastic change to the planning environment (the costs may outweigh the benefits).

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

Notes
Target particularly those places with constrained land and affordability issues.

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

Position
Unsure

Notes

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
Somewhat

Notes
Yes, but it must outline the features of a quality urban environment. At the moment the definition is so vague as to be worthless.

Clause
Do you support the features of a quality urban environment stated in draft objective O2? Why/why not? (see discussion...
No. The features are simply a statement of a few things that should be present in the urban environment in some form and be accessible in some way. They are not related to whether a high quality (e.g., vibrant, pleasant, convenient, equitable) city is created.

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
I agree that urban development can and should contribute positively to the urban environment and that this does involve change.

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

Clause
What option/s do you prefer for prescribing locations for intensification in major urban centres? Why?
Position
Option 1 (the descriptive approach)
Notes
Christchurch has already demonstrated a successful approach to intensification in its Residential Medium Density Zone which routinely achieves 50-80 d/ha. This is helped by the availability of easily developable land due to the earthquake and the zone stretches around 800m around the edge of the city (the 4 avenues, which is a much larger area than the commercial core). This circumstance means that there is not a need to urgently increase capacity at present. The suggested prescriptive approach is very broadbrush. It would result in higher densities through almost the entire city, due to our extensive (high frequency but slow) bus network. This would have the disadvantage that it would not concentrate density near the city or our commercial centres and may undermine the cities attempts to improve its urban structure and support its centres by spreading higher density out and failing to achieve a critical mass. I also consider the approach to frequent transport inappropriate outside Auckland and Wellington because other cities do not have high quality public transport. We have buses that run every 15 minutes but get caught in traffic and are slow. If the government was to support high quality PT as it has in Auckland (eg a busway) then it would be more appropriate to require minimum densities around it. I also consider that an 800m catchment is too large for the densities suggested, at least away from Auckland and Wellington and that a 400m 5 minute catchment would be more appropriate - certainly in the Christchurch case with no high quality PT routes. High density requirements in slower markets can mean that there is much slower redevelopment due to lack of demand for that product.

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

Clause
How could the example policy better enable quality urban development in greenfield areas (see discussion document, page 37)?
Notes
Given the issues NZ has with congestion and the climate emergency, greenfield should only be supported if there is high quality public transport (with dedicated separate routes) planned within 1.2km and should be designed to be primarily accessed by PT. “Transport choice” is too vague and risks locking in high carbon and expensive individual vehicle transport.

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 as it provides for car dependent development.
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
This is a matter of the extent to which the state, in some form, should subsidise development. Reducing DC’s and building new motorways, for instance, is to subsidise it with infrastructure. An alternative approach would be to use the same money to build housing in more appropriate locations. Greenfield development carries very high costs public costs compared to inner city development and it is not promoting intensification if it is subsidised at the current level through infrastructure (eg the Christchurch Northern Corridor).

 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
Somewhat
Notes
Without good public transport options, some ability to require car-parking is reasonable, but requirements should not be excessive.

 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

 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
There is probably no need to have minimum parking standards in low density areas because it is easy to provide parking and unlikely that there would be a large number of houses that do not provide it - the risk is low. A minimal provision in medium density areas would be reasonable especially where there is no high quality public transport as in Christchurch. I agree that there is sometimes no way to provide on-site parking in a visually appealing and functional way in commercial areas.

 Clause
Question 11. Do you think that central government should consider more directive intervention in local authority plans?
Position
No
Notes

 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
The Christchurch District Plan Residential Medium Density provisions are a good example of rules which collectively create reasonable quality high density development, which enables building to happen, with some space around it, and a final product that is inexpensive (considering the build cost). These are a good example of provisions that have succeeded in reconciling the desire for density and quality.

 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
A three storey built form is not really compatible with a low density zone. It is also expensive to build and is therefore only likely to be used for super-luxury housing, or to achieve very high densities (100 d/ha or more). These broadbrush rules are unlikely to be helpful in increasing the housing supply.

 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
The permitted rules should be tailored to the zone description.
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
Somewhat

Notes