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

Submission Reference no: 122
Kay Robertson
Submitter Type: Individual
Source: Web Form
Overall Position: Support

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
These seem like very good proposals to achieve better urban planning and development rather than the market-led ideas that have dominated for the past 25 years.

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
Yes
Notes
Large urban centers are where the biggest problems lie and where mistakes are the most costly in terms of poor provision of housing, transport and other services. Smaller urban areas face quite different issues.

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

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
Mandatory for major urban centres, suggested for smaller urban areas.
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
I'm not qualified to judge.

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
These are good proposals to clarify what features are important.

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
We want quality development, not just quantity or volume as was the previous objective.

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
I think we'll get much better development which creates better outcomes for people, the environment and biodiversity.

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
Allows flexibility and the ability to change and improve the results as we learn from experience.

Clause
Do you think these proposals will help to address the use of amenity to protect the status quo?
Notes
Should do, but it's a difficult balance between preserving heritage vs. making way for better land use. NZ seem quick to bulldoze character and heritage buildings and replace them with cheap and boring development. We should focus on how we can preserve and incorporate the heritage into new development.

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

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
Yes
Notes
Sounds like it's about being realistic instead of setting standards that "capacity" that isn't really feasible.

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
Agreed that bottom lines are better than targets, that more is better rather just what's sufficient.

**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**
Absolutely.

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

**Notes**
Yes, this is an important part of good planning.

**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**
It's important to match intensification with good access to public and active transport whilst creating new or preserving existing amenities.

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

**Position**
Option 1 (the descriptive approach)

**Notes**
Option 1 will allow for more flexibility (and creative solutions). Option 2 seems to rigid and arbitrary and we may end up with 'cookie-cutter' development that is too repetitive or monotonous.

**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**
I think it's better to encourage a variety of options to encourage mixed-use and social mixing vs. cheap, uniform 'ghetto' type development.

**Clause**
What impact will directly inserting the policy to support intensification in particular locations through consenting decisions have?

**Notes**
Gets things going faster. The previous government 'kicked-the-can' so much that we are really behind now.

**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**
Yes

**Notes**
If they can meet strict standards, then good developments should probably go ahead.

**Clause**
How could the example policy better enable quality urban development in greenfield areas (see discussion document, page 37)?

**Notes**
We can definitely do better with greenfield developments. Kiwi developers need to look to 'best-practice' in other countries instead of just repeating what we typically see - chop everything up into minimum sections, build lots of fences, and then houses that cover most of the land. Instead we should group houses together into terrace housing or low-rise flats and then have common green spaces, parks, community garden/allotments and other amenities.

**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
It's all a bit vague. The intentions are right, but it's the implementation that is the tricky part.

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
There are proposals to finance these costs and capitalise them into the cost of the new builds so they can be paid off over a couple decades, rather than being built into the up-front costs or born by other rate-payers.

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
Absolutely! We need more flexibility given the transport changes that are coming - shared vehicles and public/active transport. All these car parks are a waste of resources and in the future will be superfluous.

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

Position
Option 1: removing the ability for local authorities to regulate the requisite number of car parks

Notes
We used to have a 'local' pub that was required to close because they didn't have enough car parks! Even though many people walked there, there was a major bus route at the door, and supposedly we're concerned about drink driving. How ridiculous! So I chose #1 as this seems to introduce the most flexibility to choose the # of car parks appropriate for that market.

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

Position
Yes

Notes
These seem like good proposals. However, my experience from the Christchurch rebuild was that the central Government dictated and over-ruled local citizen input of what we wanted. It needs to be a 'bottom up', democratic process to some degree. I think there needs to be good, over-all master-plans for where intensification will occur. I would recommend Susan Krumkieck's 'From the Ground Up' as a useful guide. https://www.youtube.com/watch?v=fTrj2f9t3So I really wish that CERA and Brownlee had listened to this lady instead of their mates in hospitality. We've spent an obscene amount of money building a very expensive CBD that most locals don't visit. It's an over-supply of over-priced bars, restaurants and shops selling expensive frocks. It's not a community, it's like something out of the Truman Show. Cities need good planning, but they also need to grow organically, in response to the needs and desires of the communities they are suppose to serve.

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
Knowledge is a good thing, but then the Government can open the taps for immigration and there go your plans...

Clause
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?

Position
Yes

Notes
We need to honour Te Tiriti o Waitangi and their perspective will enhance and inform what we build and ultimate produce a better result.

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?
Absolutely. Was there a major motorway expansion that totally disregarded safe access to the local marae? So now people risk their lives getting in and out - design like that is just continuing contempt for indigenous peoples. You would do that to a day care centre, but it was done to a marae.

Clause
Question 15. What impact will the proposed timing for implementation of policies have?
Notes
I can’t judge that.

Clause
Question 16. What kind of guidance or support do you think would help with the successful implementation of the proposed NPS-UD?
Notes
Ditto.

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

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
Unsure
Notes

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
Unsure
Notes

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
Unsure
Notes

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

Clause
Additional information provided
Notes
Kia ora koutou, My background is finance/investments/tax/accounting, basically money stuff, so I’m not qualified to judge most of this. However, these proposals seem like damn fine ideas to me and we’re way overdue for this sort of thinking. How I wish something like this was in place when Christchurch was being rebuilt! What a wasted opportunity Anyway, I did read the whole 107 page discussion document and somewhere I recall mention of public/private partnership and also probably foreign investment. I would like to suggest a few alternative funding sources for the Government to consider. I don’t buy this idea that Kiwis don’t have enough capital and therefore we are dependent on foreign investment. There is currently about $165 billion in NZ bank accounts. Some is needed for transactions, but a heck of a lot of that is sitting in term deposits. Also, Kiwis pour far,
to invest in projects in their country - reciprocity. Thus we could diversify internationally.

For example, the proposed toll road to Whangaparaoa that Auckland apparently can’t afford to build, so it is contemplated that a Chinese company would build it and collect the tolls for 30 years. I should think this revenue stream would be comparable to a AAA rated bond and be suitable for pensioners or those seeking a conservative investment to put some of their nest-eggs into. There are heaps of these projects that need to be built and I’m sick and tired of hearing that we need foreign investment - what we need is investment products that people have confidence in that will direct our capital to these opportunities instead of them going to offshore interests. So I propose the Government create an investment fund for projects that are expected to pay a competitive return on capital, like toll roads or new renewable electricity projects like wind farms. It could be run by the Guardians of the Superfund. Given their excellent past performance, they can certainly be trusted to evaluated and choose what projects are suitable for such a portfolio. Then Kiwis could invest in this via their Kiwisaver provider, or they could invest directly through a personal account. We could all have accounts with the Superfund and cut out the middlemen who generally overcharge for being the intermediary. This would provide a wealth of new funding for the much needed infrastructure around the country. As capital was removed from the property sector (through a reduction in direct investment and a reduction in the bank domestic deposits) we would expect to see housing return to being a place to live rather than a vehicle for property speculation. Capital would instead flow to where it will improve productivity. There was recently a Treasury consultation on the creation of a Venture Capital Fund (which would sit alongside the Superfund and be managed by the Guardians of the Superfund). So I propose a third fund that would create a vehicle to direct our capital into funding the projects that we need to build better cities. Currently we seem to think that the government or foreigners are the only sources of capital, but there is a huge untapped source of investment funds from regular Kiwis. I am not proposing that savings be used to subsidise projects that don’t provide good direct returns. There will still be projects that provide a good indirect return to society; those would still need to be funded by government. But a lot of this infrastructure can have a ‘user-pays’ charge applied to it and attract NZ private capital. We just need to create an intermediary Kiwis can trust that can operate at break-even. The Guardians fit the bill. I would also like to see us be smarter about urban development and learn from Singapore and Japan. They buy the land around the stations before rail projects are built and then the government builds & owns the commercial and residential development around these stations. This has several benefits. First, we, the people, capture the capital betterment created by these government projects - instead of speculators. Second, the Government could retain ownership and the revenue stream from these buildings in perpetuity. Third, we can ensure affordable housing through Government owning the land and renting the units, thus keeping costs down for renters. Fourth, by retaining the revenue producing part of the project, the Government could subsidise the transport corridor. It seems NZ follows the Anglo-American model of owning the part that loses money (the light rail) whilst the profitable part (the land near the station points) goes to the private sector. If we owned the income-producing part, we could subsidise public transport, charge lower fees and get even more people to shift from cars to public transport. I would like to see well-thought out, master-planned urban development, like NZ used to do before the Ministry of Works was destroyed and Housing NZ was gutted.

Now I’m talking about something bigger than Kiwisaver funds... I’m talking about a sovereign wealth fund or something like the old Superannuation Corporation we used to have before Muldoon canned it. Brian Gaynor figured it would be worth half a trillion now: https://www.nzherald.co.nz/business/news/article.cfm?c_id=3&objectid=11940232 I would prefer the latter; resurrect the Superannuation Corporation I say! With a sovereign wealth fund, we run the risk of a future government privatising the assets built up over generations - again! I don’t want any more flogging off the family silver. I would prefer a system where all Kiwis collectively own these assets, but we would own the shares and they are held in trust for us, managed by the Guardians, out of neoliberal politician’s control. Years ago, Thatcher sold off all sorts on infrastructure in the UK, because private interests were supposedly better at running things than the government. Well, now British Rail and similar are largely owned by other governments, through their pension & wealth funds. Every time a Brit buys a rail ticket, they are effectually paying a tax to another government, not their own. Really stupid. For some project, I’d be ok with partnering with similar funds from other countries. For example, the Superfund and a Quebec pension fund are interested in funding the light rail between Auckland CBD and the airport. However, this would be more about benefiting from their expertise and experience and we should be able to invest in projects in their country - reciprocity. Thus we could diversify internationally.
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I don't buy this idea that Kiwis don't have enough capital and therefore we are dependent on foreign investment. There is currently about $165 billion in NZ bank accounts. Some is needed for transactions, but a heck of a lot of that is sitting in term deposits. Also, Kiwis pour far, far, too much money into property investments. Quite simply, Kiwis put their money into banks and houses because they're afraid of everything else - because they or someone they know has been burned badly. The real problem is with our capital markets. We have plenty of capital, it's just in the wrong places and there isn't a product that Kiwis trust that would match this capital up with infrastructure projects that would provide a good return.

For example: the proposed toll road to Whangaparaoa that Auckland apparently can't afford to build, so it is contemplated that a Chinese company would build it and collect the tolls for 30 years. I should think this revenue stream would be comparable to a AAA rated bond and be suitable for pensioners or those seeking a conservative investment to put some of their nest-eggs into. There are heaps of these projects that need to be built and I'm sick and tired of hearing that we need foreign investment – what we need is investment products that people have confidence in that will direct our capital to these opportunities instead of them going to offshore interests.

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