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

Submission Reference no: 129

Potentials Ltd (Angela Goodwin)

Submitter Type: Planning/urban design professional
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

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

The following tools are not necessarily more effective but I think should be considered along side the NPS Planning for activities that support growth. We plan very poorly for the services that we need to support urban development and growth. I have prepared resource consent applications for over 20 cleanfill and managed fill sites and worked on consents for landfills and quarries. Consenting and planning these activities is very costly and often complex. Operators are well experienced and have strategies to mitigate environmental effects; they often also undertake environmental enhancement projects. The consenting process for these activities is difficult because Councils do not activity plan for them, Council officers often seem opposed to them right from the start, community board members oppose them in the media and often the public oppose them. A lot of the opposition is based on misperceptions and incorrect information. This is a failure of planning because we have failed to plan for everything that a city needs to grow. To truly plan for growth we need to provide for these activities in peri urban areas, do research in a New Zealand context on peri urban development and work collaboratively with operators that are trying to run activities that support growth. There is no way that a City can grow without these activities. If we don’t plan for them and make the consents process to difficult, we push them further and further away. As we push them further away, pressure on infrastructure increases and construction costs increase. This has a flow on effect with increased costs for goods right through the economy. If it is more expensive fora developer to develop an industrial site because they have to pay a lot to remove fill, that cost will get passed on to the purchaser and operator to there consumers of products that are manufactured on that site in the future. Letting the market operate in many cases in most of our cities there is sufficient room to grow, already. In order without design, evidence is presented that shows that if the market were to operate without restriction of density and planning controls, people would be able to purchase as much space as they could afford and this would lead to an affordable city. For example, if there is high demand to live in Auckland’s CBD, the price will increase. Even though prices may be high, if a person can buy only 20m2 of space, it still remains affordable. Yes, they will only have a small space but that is a trade off they make to be close to a number of amenities and presumably employment opportunities. To a certain extent the market will regulate itself in terms of density and height. If the construction cost is less than the value of the land per square metre, density will be higher. If construction cost is more per square metre than the land value, density will be lower because it isn’t economically viable to go higher. We need to understand more Rural land management. The focus of the discussion document seems to be heavily weighted towards residential development and affordability of housing (that in itself is a result of supply and demand). Planning for growth encompasses all land uses and will ultimately fail if we don’t better manage rural land. Currently we allow lifestyle block development close to the boundaries of cities, this pushes up land values, based on expected value. The price of productive land next to the lifestyle blocks increases and this decreases the viability of productive land. In turn those lots get turned into lifestyle blocks. Over time there is pressure for lifestyle blocks closer to the City to house greater numbers of people and eventually as is best evidence by the expansion of Auckland, this results in haphazard growth into Greenfield areas. The solution to this, in part is to have more national guidance (and a lot more research) on rural land management. Its my opinion that having Unitary Authorities that cover larger areas assists in this regard because there is more incentive and direction to see
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
Yes, there is clear evidence that within a wider region (and likely in New Zealand across multiple regions) that facilitating the growth of the most productive cities lifts the productivity of smaller cities. It is therefore, in my view more efficient to first prioritise those cities that are the fastest growing and face the greatest challenges. It is important though that lessons are made available so that when smaller centres reach the stage of growth that larger cities are at now, they have research and better evidence to draw on.

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 changes to future development strategy provisions. There is some discussion that Local Authorities don’t do spatial planning but almost every local authority with urban areas has a form of spatial planning such as a structure plan or growth management strategy. The biggest risk is that those strategies don’t understand the operation of the market and urban economics. To be successful, in my opinion, it is vital that Councils preparing future development strategies understand urban economics, have an understanding of the market in that city and also need to be more future thinking. Often, spatial planning is design-led rather than having a solid understanding of the market and where demand is. A trend that I see in New Zealand with strategic planning is that we tend to take the world as it is today and just project it forward. We assume that we will still be driving cars in 10 years time, that no new building technologies that allow different building forms will develop. In reality, there will continue to be exponential growth in technology. Infrastructure will change a lot and planning to provide the infrastructure that we have today, in 10 years time may not be accurate. There will be large changes in energy provision and transport that will completely change the spatial structure of our cities. There needs to be a requirement for Future Development Strategies to consider future cities, no just assume growth of the status quo. Also very important is to look at the constraints that Cities have in spatial planning. Where are flood plains and hazards? How will these be impacted by climate? A good example of this is planning for Takanini in Auckland. Currently most of Takanini and the future urban land beyond it is in a flood plain. As each house is developed, they have to undertake a flood assessment and be at least half a metre above the flood level. The extra development will displace flood waters. It puts pressure on stormwater infrastructure and means that it is most expensive to develop that land. Is it really sustainable and something that we want, for people to live in flood plains? If we make that decision through spatial planning, then we need to do all the research on the effects of that at the start as part of the spatial plan, not just pass those costs down to each individual developer. To do that is inefficient and its not effective. Its also contrary to effectively providing for growth.

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
I think if the description of what constitutes a good quality urban environment is too high level it risks becoming meaningless. If terms like ecologically sensitive design are used there needs to be more discussion of what this means in practice. I think it is an important part of decision making. In our applications for resource consent now, we include a section on the NPS for urban development capacity and how the proposal is consistent with it. Using urban land efficiently is vitally important. But its not a statutory requirement for an assessment of environmental effects report. I think that an assessment against the NPS or at least an assessment on how the proposal constitutes to the efficient use of urban land should be a requirement in s88/ Fourth Schedule.
Do you support the features of a quality urban environment stated in draft objective O2? Why/why not? (see discussion document, page 26)

Notes
Please see above

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
Please see above

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 strongly support these proposals. Too often, in my opinion Council planners approach amenity from a negative viewpoint. Often they start with their personal preferences and don’t acknowledge that for some people having a 20m² outdoor living area and a larger indoor space is something that gives them a higher level of amenity. Too often, Council asks clients to make changes to their proposals, even though they meet basic planning requirements but it is to facilitate individuals taste. Even though a development is designed by a well qualified and experienced architect or designer and meets the outcomes of the District Plan, Council still request changes to details (such as different colours, or change in cladding. Amenity values are very subjective in the way Council currently interprets them. This needs to be reduced to reduce the overall costs of development and make urban development more effective.

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

Notes
Please see above

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

Notes
Please see above

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

Notes
Please 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
Yes, planning needs to have a much better understanding of the market. One area that is currently lacking is strategic planning is an understanding of infill and the capacity that can be realised through the removal of an existing house and construction of four in its place or the construction of two houses to the rear of an existing house. To often plans have allocated land in places that aren’t feasible economically to develop. Requiring Councils to have an understanding of that is good because it requires them to think about other interventions that might be needed to realise that capacity. For example, development in the CBD of a smaller city might not be viable now but if you reduce development contributions, it may tip the balance and result in that capacity being realised. I think the policies in this area should refer to a range of housing types and locations being available but I do not think it should refer to price as this is something that Councils have limited control over. There are so many other factors outside of local authority planning that effect price. I note that the bottom lines are to be inserted in district plans without the schedule 1 process but the methods to realise the bottom lines follow a schedule 1 process. Is there a risk that through the schedule 1 process, Council ends up in a position where submitters oppose methods to realise the capacity and they end up not being able to achieve the methods that would achieve capacity? The schedule 1 process is still very litigious and this creates uncertainty.

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**
Yes I do. I think that too often there is a mismatch between this and the ways consents are processed and we see this in practice on almost a weekly basis. Every planner is different in their assessment. To often we spend time having to argue about things that really don’t make a lot of difference in the scheme of things (like where a rubbish bin will go or if there is enough room on the kerb on rubbish collection day (even if there is ample a lot of time gets wasted demonstrating these details)). Currently, whenever amenity values are mentioned in an assessment criteria the assessment is so subjective. The amenity values that are expected need to be defined in some detail to avoid this subjectivity. E.g. outdoor living areas should get x amount of sunlight between these hours. Too often planners start with what they consider acceptable amenity but this can differ to what applicants consider provides them with the best amenity. As an example of this Council sometimes has asked us to flip internal layouts of buildings so that the entry door is by the kitchen. In all cases this has been contrary to our clients cultural beliefs and if it were done, it would cause them distress and greatly detract from the amenity of their property. In my observations with multi unit and terraced housing we are moving into territory where whenever amenity values are mentioned Council starts to focus on very small details. There needs to be clear direction that the focus should be on the key things that make up amenity, not on minute details. Personal opinions also should not be part of the assessment.

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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**
Please see above

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

**Notes**
Please see above

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**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**
I support encouraging intensification. One option is to allow the market to dictate where density goes. For example, allowing opportunities for density across the City. In cities like Hamilton that are relatively small, all centres are relatively close to anywhere in the city. The notion of having walkable centres is great but in reality there will never ever be a match of jobs and services to the people living in a 800m radius so people will still have to travel outside of the centre. In saying that we have always chosen to live within walking distance to a centre or block of neighbourhood shops and it definitely makes it more convenient for us and provides amenity. The 800m metric I think there should be flexibility to apply this to the area. In flat areas maybe people walk further or take a scooter, or a bike. 800m uphill is a lot different to 800m on the flat. So I think the 800m will vary from place to place. Another option to those proposed is to limit the establishment of sections over 500m2 and allow greater intensification in existing lower density zones like the Single House Zone in Auckland. There seems to be a lot of capacity sitting in some of the Single House Zones that could be realised. I wonder if there is a danger that if it is based round public transport stops it means that plans will be slow to respond to changes in public transport (ride sharing, driverless cars, etc) because you are building density around where a stop is rather than the other way around (e.g. build density and transport services will become viable).

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

**Notes**
Please see above

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

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

**Notes**
I am not sure about either option but think a descriptive approach is better. I am not sure about the 800m metric. 800m uphill is very different to 800m on the flat and with electric scooters and whatever technology comes next maybe the focus doesn’t just have to be on walking. Also in smaller cities like Hamilton you could feasibly allow opportunities for high density across most of the city and let the market decide because the size of the city is such that everywhere is accessible to the CBD.
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 should be more a focus on outcomes. E.g have as many houses as you want as long as these criteria are met (e.g. stormwater management, response to natural hazards, effects and achieves a reasonable quality of living for future residents. Providing it doesn't mean that it will be taken up if it isn't in the right location or viable.

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

**Notes**
It would require greater weight to be given to efficiently using urban land.

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**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**
Allowing out of sequence Greenfield land development is inefficient in most locations unless it can be justified or is a matter of only a short time period.

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**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**
Currently, development contributions are quite high for infill in Auckland and see to be disproportionate. Reducing these I think would lead to more capacity being realised and sites being used more efficiently that would benefit future generations.

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**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 think this is better controlled by the market particularly in the future when cars and methods of private transport are likely to change and having a car park won't be as necessary.

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**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**

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

**Position**
Somewhat

**Notes**
I think that local government should intervene when there are a series of consent decisions that don't meet the intent of the plan in terms of intensification and when the NPS isn't being given effect to effectively. But I think its important to allow local authorities flexibility to best manage there respective jurisdictions.

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

**Notes**
Height in relation to boundary is having an unforeseen impact in Auckland. To avoid HIRB infringements designers are just cutting into sites. This is not the best outcome in terms of land modification or stormwater management. It is not leading to development that responds to the underlying land form and characteristics of sites. It is difficult too because the dominance of a building depends on so many things, not just how high it is in relation to the boundary. Sometimes a building that complies with HIRB is more dominant than one that doesn't because of its design. In theory land values should determine building heights without the need for planning controls that do this although some controls on height are necessary to protect volcanic viewshafts and coastal character, etc. Outdoor living area controls can be restrictive. The outlook space standard in Auckland
also has unintended consequences for internal layout of houses, with the largest window of a living area often being over a driveway because the driveway and manoeuvring area by default is 6m (the outlook space requirement). This isn't always the best outcome.

**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 Auckland rules of allowing 3 dwellings per site work well (except on large sites where they lead to underdevelopment). Sometimes I think the approach taken in the terraced houses and apartment buildings zone where all dwellings need consent is too restrictive, especially buildings designed by highly experienced architects. The Hamilton duplex rule is good and provides opportunities for density throughout the City (that seem to be being taken up). I haven't seen an example of it (but the Unitary Plan THAB zone comes close) but in some zones it should be highly restricted for people to develop just one house.

<table>
<thead>
<tr>
<th>Clause</th>
<th>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)?</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Notes</strong></td>
<td>Yes because land values will determine how high it is viable to build in any case. It shouldn't be that people have to develop 3 stories but that the opportunity is there. The only exception to this is where its not practical to do so or where it would have other effects (e.g. natural hazards, volcanic viewshafts, special character areas).</td>
</tr>
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**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**
All Councils and planners should have an understanding of how the market is operating. Without this its difficult to plan effectively.

<table>
<thead>
<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>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Position</strong></td>
<td>Yes</td>
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<tr>
<td><strong>Notes</strong></td>
<td>I do but I think that iwi needs to be adequately resourced to be able to contribute to these discussions.</td>
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</tbody>
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**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**
Working with Ministry of Education regarding provision of schools is critical.

**Clause**
Question 15. What impact will the proposed timing for implementation of policies have?

**Notes**
I don't think there will ever be a perfect time. It needs to be efficient and there needs to be tools provided to Councils.

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

**Notes**
Urban economic tools are vital, even considering providing Councils with models to use. Its not practical to expect that all Councils will be able to employ urban economists. Equally urban economics is a specialised field that isn't large in New Zealand so there is a limited number of professionals.

**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
Yes
Notes
I think there is tension between the productive land NPS and this one in relation to Greenfield's development.

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

Clause
Submission context
Notes
By way of background to my submission, I am a planner and own a planning consultancy Potentialis Ltd. Please note my submission is a personal one but the form required a company name to be entered. I have over 15 years experience as a planner in Central Government, Local Government and the Private Sector. I have an economics diploma and Bachelors and Masters degree in planning. I have an interest in urban economics and our consultancy prepares a lot of consents for residential development in Auckland and the Waikato as well as other land use and subdivision activities. I also have some experience in policy. I unfortunately have run out of time to completely answer all the questions but the answers I have provided cover my general thoughts of the proposed NPS. Angela Goodwin