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

Submission Reference no: 131

Robert Manthei, Robert Manthei (Robert Manthei)

Submitter Type: Individual
Source: Web Form
Overall Position: Oppose

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
Yes, but this document does not deliver that. First, residential amenity and liveability are not protected under this proposed planning. It also assumes that the only way to 'make room for growth' is through this 'anything goes' densification. It sacrifices well-functioning areas of urban development to the whims of developers in the 'hope' that they will deliver a better solution to rather non-existent problems.

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. Retain zoning and protect those zones from incursions by other uses! For example, in Christchurch's inner city, much residential land has been lost to commercial and other uses this limiting the goal of achieving more housing within the 4 Avenues. When the aim is to increase housing of all sorts, land usage of residential zoned areas must be protected, not compromised by other uses. Non-residential use in residential areas limits and compromises both amenity and liveability for residents already there, thus weakening the desirability of living in those areas, thus reducing permanent populations from living there, thus reducing overall living quality.

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
A 'One size fits all' approach will result in a sameness of housing types and styles across the country. Individual urban areas should be left to make their own planning decisions and not be bound by one policy. Policy descriptors--yes; prescriptive policy-no. There are huge differences amongst our cities/urban areas and a prescriptive 'directive' plan for the whole country will probably not meet the aims/needs of any one area, let alone form a successful blueprint for the entire country. Some of the greatest risks in a prescriptive approach is to reduce the variety in size and type of dwellings in dense urban areas, which will in turn lead to fewer families and long-term residents for whom this restricted type of housing will be suitable, will allow for less vegetation, fewer trees and garden-type areas amongst the intensified housing developments, and lead to a proliferation of short-term, rental, or tourist accommodation within our urban areas. None of these consequences will lead to enhanced amenity and liveability for residents already living in these areas, or wanting to live there.

Clause

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

Position
If a prescriptive requirement is used, how should the density requirement be stated? Please provide a suggestion below (for clause not high-rise, high density, limited space housing. In short they will leave the inner city. Who will 'escape' to other areas as soon as they are able, can afford to, or begin families. They will look for other housing that is not diverse, interesting cities. They will lead to such housing being less-than-permanent options for most people who will 'escape' to other areas as soon as they are able, can afford to, or begin families. They will look for other housing that is not high-rise, high density, limited space housing. In short they will leave the inner city. Hard to say, but some things are certain: there will be a 'sameness' in design that will attract a similar category of dweller. They will not create diverse, interesting cities. They will lead to such housing being less-than-permanent options for most people who will 'escape' to other areas as soon as they are able, can afford to, or begin families. They will look for other housing that is not high-rise, high density, limited space housing. In short they will leave the inner city. It does not make sense to have zoning rules for developers are vital to preserve current and future amenity for residents. Removing all rules related to height restrictions, recession planes, site coverage, property size and outdoor space will result in severely negative effects on liveability. There are other ways of increasing density within inner cities; however, to 'let developers loose' and expect them to create high quality, high amenity living forms for residents is a wild hope, and one that will not be realised. Profit will overcome all other considerations and large tracts of unattractive housing stock will be created within our cities. For residents, access to sunlight, outdoor space, a feeling of safety (for earthquake survivors, for example, overly tall buildings provoke anxiety and concern) and a pleasant visual aspect are essential in creating liveability. Yes, but more importantly, if written and acceptable, they must then be enforced! It does not make sense to have zoning designations that are then compromised by incursions by other uses. For example, in Christchurch's inner city, limited residential zoned land has frequently been 'given away' to other to other uses, thus losing that residential land for the use for which it had been zoned. Examples are the Salvation Army development on the corner of Salisbury and Colombo Sts and the proposed Youth Hub on Salisbury St. There are many other smaller plots of residential land that have been lost over the years merely because developers have asked for and been granted variations in land use. All this is happening at the same time the city is saying it wants to increase the number of residents within the 4 Aves by thousands. The rule should be: create sensible zones and then enforce their use. Yes, but more importantly, if written and acceptable, they must then be enforced! It does not make sense to have zoning designations that are then compromised by incursions by other uses. For example, in Christchurch's inner city, limited residential zoned land has frequently been 'given away' to other to other uses, thus losing that residential land for the use for which it had been zoned. Examples are the Salvation Army development on the corner of Salisbury and Colombo Sts and the proposed Youth Hub on Salisbury St. There are many other smaller plots of residential land that have been lost over the years merely because developers have asked for and been granted variations in land use. All this is happening at the same time the city is saying it wants to increase the number of residents within the 4 Aves by thousands. The rule should be: create sensible zones and then enforce their use.
example, 80 dwellings per hectare, or a minimum floor area per hectare).

Notes
The important question here is 'what is the present problem?' and, if there is a real, measurable problem, what density goal should be put in place to resolve it? I already live in an area in Chch that requires 50 dwellings per hectare--that is fine, still allows for amenity, some variety and liveability. Anything above that requires much higher buildings with all the consequent limitations on variety, outdoor access, sunlight, and visual amenity. Again, a 'one size fits all' ignores the many differences that exist across urban areas, and, importantly, will penalize current residents in our inner cities.

Clause
What impact will directly inserting the policy to support intensification in particular locations through consenting decisions have?
Notes
There would be several deleterious impacts that are probably not foreseeable. For example, the one dwelling for every 200m2 has led to several unintended consequences. To wit, a lessening of population in an area rather than an increase. This is often due to the high cost of the new dwellings being excessive so that only wealthy, usually older, people can afford to buy them. Thus, where there used to be, say, four aps in a two story house, there may now be two or three new townhouses. In many instances the 8-12 people who used to live in the 4 aps has been reduced to 4-6 people living in the 2-3 new townhouses. The result is a loss in population in spite of dwelling intensification.

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
Yes, developers should be made to make a much greater cost to infrastructure, environment and social costs.

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
Yes, but not by allowing the building of multi-unit housing with no off-street parking. This only leads to 'hard-to-sell' units. There must be limits on car parks with inner city housing, but there must be some off-street parking required.

Clause
Question 11. Do you think that central government should consider more directive intervention in local authority plans?
Position
No
Notes
No, the government should set guidelines and descriptive parameters, but it should not dictate/prescribe to all cities using one set of rules. Rely on zoning rules to protect current areas and promote the development of similar new areas. Enforce zones, eg, keep residential land residential. This is urgent.

Clause
Which rules (or types of rules) are unnecessarily constraining urban development?
Notes
These are not rules, but building costs and land costs restrict building of housing that is affordable, varied in its appearance and design, and appeals to a wide variety of people.

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
Yes, require that any multi-unit project necessarily include a percentage of lower-cost units so that, overall, the residents are not all of one type and income level. We risk having our cities become enclaves for the rich.

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
No, this needs to be decided locally and individually.
### 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**
The importance here is to assess supply and demand, but not to rely only on those criteria in setting policies. Environment and social concerns are equally important. Do not overly rely on ‘market indicators’—they put profitability first and foremost and there are greater considerations now given urgent problems such as climate change, transportation and economic sustainability.

### 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**
Much greater consultation is required with hapu and iwi. Large iwi should be greater players in the housing market.

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

**Notes**
Any new policies should not be rushed. What is being proposed is so radical and potentially so impactful that it must be done correctly. Once some of the implied/suggested changes are implemented, there will be no going back. Negative effects will be there for a very long time.

### 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**
Yes, I see a contradiction between this prescriptive approach without any clear statement of the problems they are designed to control or remediate, and the government’s approach to the issue of deteriorating water quality throughout the country. In the first case there is a proposed solution to a problem that has not been clearly identified, whereas in the face of continuing degradation of water quality, there is very little of consequence being done, certainly not along the prescriptive lines outlined in this document. In the latter case there is clear and measurable problem, one that demands urgent prescriptive regulations. So what is holding up the government’s direct intervention in this area?