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

Submission Reference no: 135

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Submitter Type: Individual
Source: Web Form
Overall Position:

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 support the NPS-UDC but wish to see Council's properly supported by Central Government in helping to achieve it's aims, and the steps / work involved to help achieve these aims should be as clear and tangible as possible.

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
Unsure, perhaps urban development authorities (UDA) but am not over all the proposed detail on UDA's yet.

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, this makes sense for high growth areas, but they should be somewhat easily transferable to other cusp cities or towns looking to increase housing densities in any areas, to a quality degree.

Clause
Do you support the approach used to determine which local authorities are categorised as major urban centres? Why/why not?
Notes
Yes, this appears to be based on the latest statistics so I can understand the logic.

Clause
Can you suggest any alternative approaches for targeting the policies in the NPS-UD?
Notes
Closely monitor growth statistics so that any of the other previously identified high or medium growth Council's can be quickly picked up and added to the MUC's pro-actively, not re-actively ten years down the line when they too have problematic like the existing MUC's.

Clause
Question 3. Do you support the proposed changes to FDSs overall? If not, what would you suggest doing differently?
Position
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
The major urban centre involve Council's who are probably better resourced to undertake an FDS. All Council's should undertake a strategic planning process as part of their usual long term planning (including District Plans and ideally spatial plans), but not necessarily as an FDS.

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
Unsure but an FDS would obviously need to be well aligned with (or compared against) the operative and/or proposed District Plan.

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
More nation-wide consistency in this space can only improve our collective urban environments - especially in the larger centers.

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
Yes, is well written and comes across quite clear.

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
Unsure how much actual weight they would be given, considering they are not very directive. Once these objective and policies are captured in District Plan's, I would imagine they would have a higher impact on decision making.

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
No comment

Clause
Do you think these proposals will help to address the use of amenity to protect the status quo?
Notes
Again, not very directive so I don't think these proposals will be noticeably helpful.

Clause
Can you identify any negative consequences that might result from the proposed objective and policies on amenity?
Notes
No negative consequences in my opinion.

Clause
Can you suggest alternative ways to address urban amenity through a national policy statement?
Notes
Try to be more directive and descriptive where possible - useful pictures/built examples can help also.

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
Adding an improved feasibility check is only sensible, in terms of proposed developments actually being realistic, and potentially more able to be relied upon with regards to FDS and future planning.

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
Using direct language and requirements would certainly help in this regard.

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
Yes

Clause
Do you think that amenity values should be articulated in this zone description? Why/why not?
Notes
Yes, it all helps in terms of understanding the characteristics of certain areas - especially for people that are new to a location, something that goes hand in hand with higher growth areas.

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
No comment

Clause
What impact will these policies have on achieving higher densities in urban environments?
Notes
The policies themselves, I do not think will achieve higher densities, but they should help to achieve better designed outcomes - especially once given effect to in regional/district plans.

Clause
What option/s do you prefer for prescribing locations for intensification in major urban centres? Why?
Position
Option 2 (the prescriptive approach)
Notes
The more prescriptive at the NPS stage, the more aligned and consistent urban growth will be in all MUC's. We shouldn't have to go on comparing liveability from one MUC to the next, we should aim high for all MUC's to enjoy a similar level of livability, and I feel this can only come from a prescriptive approach that is less open to interpretation than a descriptive approach.

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
Site coverage limitations would continue to work fine I would consider.
What impact will directly inserting the policy to support intensification in particular locations through consenting decisions have?

Notes
Hopefully a good one in terms of going ‘up’.

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
Unsure

Notes
No comment

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

Notes
No comment

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 comment

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 needs to be better cost sharing in place - with central govt and Council's contributing more than half. This currently appears to be left far too much to developers with no risk for pro-active approaches from Council's, even if it means increased growth and more people paying rates.

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
No comment

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
Need to move away from car-centric planning, along with the parking requirements it brings.

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

Position
Option 2: removing the ability for local authorities to set minimum car park requirements

Notes
No comment

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
Might be more realistic to achieve, and allow for some parking protections in the suburb's where families live and often may need more than one car, depending on family size and accessibility to public transport.
Clause
How would the 18 month implementation timeframe impact on your planning processes?

Notes
No comment

Clause
What support should be considered to assist local authorities when removing the requirement to provide car parking to ensure the ongoing management of car parking resources?

Notes
Regular reminders to the public (in some shape or form) that this is a national requirement and not just Council's picking on certain streets or areas willy nilly.

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

Position
Yes

Notes
Yes, if it helps achieve better outcomes for MUC's as noted above for Option 2, prescriptive approach.

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

Notes
Car parking rules and building recession plane rules

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
No

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 minimum level of development (aim) would be useful, to help guide what people and developers should be considering for certain areas.

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
There would need to be some form of ‘over-riding’ if the aims of this NPS are to be acheived - but this should be discussed with Council's and communities first so they better understand the trade-offs and need for them.

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
Useful as very realistic data to consider now and in the future (by looking at part trends and future predictions).

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 listen to and work with Māori, as their world view is very holistic and at one with the natural environment - improved inclusion here can only have benefits and continue to herald Aotearoa's uniqueness in the world.
Clause
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?
Notes
I do not feel this is my comment to make - would be better understanding from iwi and hapū.

Clause
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?
Notes
Unsure - would be better understanding from iwi and hapū as they are likely to already have views on this.

Clause
What impacts do you think the proposed NPS will have on iwi, hapū and Māori?
Notes
Hopefully better impacts if there is more inclusion.

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
No comment

Clause
Question 15. What impact will the proposed timing for implementation of policies have?
Notes
No comment

Clause
Question 16. What kind of guidance or support do you think would help with the successful implementation of the proposed NPS-UD?
Notes
I support the NPS-UDC but wish to see Council's properly supported by Central Government in helping to achieve (and fund) it's aims, and the steps / work involved to help achieve these aims should be as clear and tangible as possible.

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
No
Notes
No comment

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
No comment

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
No comment
Clause
Question A2. What do you anticipate the impact of the proposed polices (and any related changes) would be on planning and urban outcomes?
Notes
Hopefully improved - as long as enough resource and monitoring is provided to support this NPS.

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
No comment

Clause
Question A4. How could these policies place a greater emphasis on ensuring enough development capacity at affordable prices?
Notes
No comment

Clause
Question A5. Do you support the approach of targeting the HBA requirements only to major urban centres? Why/why not?
Position
Yes
Notes
No comment

Clause
Unless you select one of the options below, the Ministry will consider that you have agreed to have your submission and your name posted on its website.
Notes
No comment

Clause
Contents of submissions may be released to the public, if requested, under the Official Information Act 1982. Please indicate below if you consider all or part of your submission should be withheld.
Notes
No comment

Clause
Part(s) of my submission I believe should be withheld and reason(s) for withholding
Notes
No comment