10 October 2019

Ministry for the Environment
PO Box 10362
Wellington 6143
New Zealand

By email: nps-udconsultation@mfe.govt.nz

Dear Sir / Madam,

SUBMISSION RE: PLANNING FOR SUCCESSFUL CITIES – OUR PROPOSAL, YOUR VIEW

Williams Corporation Limited is currently the largest residential developer in Christchurch City and the second largest in all of Canterbury. We currently have 282 homes under development or construction, all selling under the criteria for affordable. We are just starting affordable housing projects in Auckland and soon to start in Wellington.

We specifically support housing intensification in the CBD and inner city suburbs in New Zealand’s major centres, and also other centres which share a demand for intensification.

We wish to submit on the following specific consultation questions:

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?
   - 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?

   **Comment:** We support this intention. We do however consider that there are other RMA / non-statutory tools which would assist in allowing developers to better provide for growth. Specifically:

   - We oppose requirements that require legal street names for lanes / Right of Ways for six or more units. This adds unnecessary costs and delays to the completion of developments.

   - We request that Ministry of Business, Innovation and Employment (MBIE) requirements are altered in the following specific respect: when a house is sold conditional on completion, where none of the clients funds are held in the vendors possession and no progress payments are taken, we would like no MBIE forms to have to be completed. In these developments we also do not want the buyers having the right to request variations. All of our products are bulk
purchased and ordered in advance to enable affordability. The MBIE requirement are no in keeping with affordable housing developments.

Comment: We request that all New Zealand cities are included in these policies, to allow them to share the same benefits of larger centres e.g. affordable housing close in CBD / inner city suburbs. This particularly applies to fast growing urban centres such as Nelson and Tasman, which is currently excluded as a major urban centre in this proposal.

Comment: We support these policies, however, would request that policy P6B also applies to all cities (not just major urban centres) for the reasons outlined above.

Comment: We support the removal of prescriptive car parking requirements by local authorities, in particular P7A Option 3, although seek this is expanded to all cities. The reasons for this being that residents in central city / inner city suburbs are moving away from the historic car ownership trends,
and rely more and more on alternative modes of transport e.g. public transport, walking, cycling, e-scooters. By removing car parking requirements, it allows for more a more efficient use of land, and increases house affordability.

**Comment:** We consider that ‘urban design’ rules (i.e. subjective design assessments required as part of a resource consent applications) are a major constraint on urban development and adds considerable uncertainty and delay to applications. These should be removed.

We are concerned about the moves in Christchurch to have subjectivity added to planning rules. They are discussing when an application is fully compliant that they have the right to look at the entire area and say yes or no on each individual project. This becomes opinion and is not consistent with clear policy and will create a barrier to the supply of affordable housing. Planning rules need to provide certainty such that developers can know when they assess land, what they can do as of right. This enables funds to be committed and the projects to occur with a fast delivery. I did once read a high court ruling that planning rules needed to provide certainty. I agree with this ruling and would request that government provide certainty in their rules and processes.

Yours sincerely,

**Williams Corporation Limited**

W: www.williamscorporation.co.nz