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

Submission Reference no: 142

Nga Maunga Whakahii o Kaipara

Submitter Type: Iwi
Source: Web Form
Overall Position: Support in part

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
Somewhat
Notes
We want to ensure Iwi rights to develop Papakainga, Tribal Lands or Settlement Land and that any National Policy Statement and subsequent application by Local Authorities supports that and does not restrict that ability.

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
Somewhat
Notes
This does focus on the largest centres first but lets ensure Local Bodies work together and that boundaries do not stop sensible development. IE Growth in smaller urban areas that may have infrastructure capacity but cannot attract grow due to lack of employment opportunities. Instead of current urban sprawl. Invest outside where it makes practical sense.

Clause
Do you support the approach used to determine which local authorities are categorised as major urban centres? Why/why not?
Notes
Yes but as per above statement

Clause
Can you suggest any alternative approaches for targeting the policies in the NPS-UD?
Notes
A more integrated approach, eg: NZTA/Rail/Education all these feed into Urban Design outcomes

Clause
Question 3. Do you support the proposed changes to FDSs overall? If not, what would you suggest doing differently?
Position
Somewhat
Notes
This could be a nation wide sweep in the first instance to identify opportunities, eg: where is there opportunity or barriers, once done then decide who and where and timing of areas FDS.

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
Other authorities to at least do the exercise. I dislike the wording P1G "all others encouraged to give effect to these policies.

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
There needs to be adequate inclusion of those that ultimately will live work and play in the quality urban area.

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
The preamble includes the statement that these points "would not have legal weight" but aims to be reflected in the NPS-UD. All well and good but ultimately Local Bodies look to the RMA and other legislation these documents too needs to support this intent.

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 these statements reflect the focus on housing but do not adequately lift the focus on local work. EG O2 (P2A(c)

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
Somewhat
Notes

Clause
Do you think these proposals will help to address the use of amenity to protect the status quo?
Notes
Needs more emphasis on links to other things eg: RMA and Tree Protection

Clause
Can you identify any negative consequences that might result from the proposed objective and policies on amenity?
Notes
Agree that values change but we need to retain the environmental values and not forget them.

Clause
Can you suggest alternative ways to address urban amenity through a national policy statement?
Notes
Access to amenities can often end up with waste in the environment. This needs to be recognised.

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
Somewhat
Notes
There is a risk that excessive reach into rural area will conflict with environmental values and despite the Productive land strategy we will see more loss of land resulting in more food miles and other impacts.

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
Somewhat Agree criteria needs to enable more sensible outcomes, agreed prioritisation eg: funding sitting in other infrastructure organisations that can assess need/investment more globally. P4G (b) The risk of pressure for Greenfields development. Needs to be closely tied to need and not just pressure from developers.

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 provided it does not stymie development by Iwi of their Land. EG: Existing Forestry land that could be developed for housing such as Riverhead. The process need to better indicate places of risk of Climate Change, impact on fresh water and landscapes of significance and assess these better prior to setting any zones.

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

Notes
Indicative perhaps but acknowledging changing community needs.

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
Provided it is not at all costs and recognising other values that might apply to that place. IE Heritage

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

Notes
Positive but i am mindful this maybe not what existing land owners signed up for when they bought their existing properties..

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

Notes
Providing this is not arbitrary and has ability to recognise where intensification may not be appropriate.

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
Unqualified to comment

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

Notes
May change existing character in a negative way. May have positive outcomes in utilising existing infrastructure, getting people out of cars etc.

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?

Notes
If assessed

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
No

Notes
Developers will always try and maximise the salable space and minimise car parking which can transfer the problem into public
Clause
Which proposed option could best contribute to achieving quality urban environments?
Notes
Do not support the removal of regulation.

Clause
Question 11. Do you think that central government should consider more directive intervention in local authority plans?
Position
No
Notes

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

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
Somewhat
Notes

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
If we wish to create a sense of identity, support history and foster language place making is a good place to start.

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
Only if Iwi and Hapu are involved in creating urban development plans from the start. This cannot be tokenism but outcomes reflect the input.

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
They can engage but Mana Whenua input should hold more place in the final decision making.

Clause
What impacts do you think the proposed NPS will have on iwi, hapū and Māori?
Notes
It may provide a framework that prioritises development over Maori values for some locations. It needs to maintain opportunities for Maori to develop their Land.

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

Notes
A collaborative approach. How do you prepare, Tauranga, Hamilton and Auckland in isolation. Also collaboration with other infrastructure stakeholders.

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
Rail cannot sit outside this conversation.

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
Yes

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
Yes

Notes

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
Resistance to intensification in some established areas and the risk of haste to open up "Greenfield“ development before understanding all the implications.

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

Position
No

Notes
There may be logical areas outside the major urban centres that are logical places that could accommodate growth.

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.

Position
Please do not include my name in the published summary of submissions.

Notes
I replied on behalf of Nga Maunga Whakahii o Kaipara.