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

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FIT Wellington (Fair, Intelligent Transport) (An informal group of 7 people) New Zealand
Submitter Type: Other
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
The present system is clearly not working. An effective response to climate change is now desperately needed. ‘Density done well’ is a very effective approach to greater urban density and more effective public transport, but ‘done well’ is crucial.

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
While main centres have the biggest problems, all urban centres can benefit from limiting sprawl. A few of the new requirements may too expensive for small centres.

Clause
Question 3. Do you support the proposed changes to FDSs overall? If not, what would you suggest doing differently?
Position
Yes
Notes
Future outward expansion must be well planned, and suitable for transport modes other than a car. Sprawl is also damaging to agriculture, especially when it is on good soil.

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
The Ministers Statement is clear and accurate: “However, a startling array of indicators in housing and urban development tells us we have a problem: severe housing unaffordability, falling home ownership, increased hardship and homelessness, increased household debt, intergenerational inequality, congestion, poor transport choice and urban pollution.”

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. Density is crucial to managing land use and walking distance, and must not be controlled by NIMBYs
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
More rational decision-making, and substantially more sustainable transport

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
Amenity values risk acquiring a default value of 'no change.'

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

Notes
Yes.

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

Notes
Negative consequences are inevitable because 'amenity values' are so vague, and individual. They include quality terraced housing, walking to shops, surgery or jobs, trees, parks and playgrounds, sun, large sections, good public transport, a quiet neighbourhood and good sound-insulation.

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
Demand predictions should not be allowed to become targets. Excess capacity for intensification is unimportant, but its opposite must not be allowed to promote sprawl. There is a growing need to accommodate radically changing concepts of climate change response.

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

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
For main centres, this might be the most important point of all. A Mass Rapid Transit stop is an obvious centre for intensification. It should be located appropriately, and preferably early, then well-used.

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

Notes
Good to excellent

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 best prescription will be a density range, expressed as persons/hectare. Dwelling numbers are too vague, because of wide variations in numbers of residents.

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
In the case of a principal Mass Rapid Transit stop (Auckland, Wellington & Christchurch only) the permitted density might be as high as 6-8000 persons immediately around the stop, then falling away to existing levels at a radius of perhaps 800 m Overall densities below about 50 persons/ha can have a dramatic and damaging effect on transport energy use, and public transport operating costs (Sustainability & Cities, Newman & Kenworthy 1999)

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

Notes
Exceptions will clearly be needed, such as (genuine) heritage or taonga, or parkland.

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
If climate change and quality farmland are issues, Councils must have powers to limit sprawl.

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
Car parking is only an amenity for the person using each car park, and promotes congestion. Shopkeepers always claim on-street parking is essential to their business, and are always wrong. On-street car parking is in competition with other road uses, and often dangerous for cyclists. Managing on-street parking is an important tool for controlling congestion.

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

Clause
How would the 18 month implementation timeframe impact on your planning processes?

Notes
Not needed

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

Position
Yes

Notes
Perhaps limited to larger cities

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

Notes
Proscriptive limits on housing types

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
Generally yes, but with limits and perhaps with two-storey around the rim of a three-story zone. Councils should not be allowed to reduce height limits

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
A useful indicator of planning progress

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
Unsure
Notes

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
Unsure
Notes

Clause
Question 15. What impact will the proposed timing for implementation of policies have?
Notes
Given the Ministers' 'startling array of indicators' and looming climate disaster, fast will better than slow

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

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
No
Notes
Councils need to recognise that climate change is making the future much less predictable, justifying greater margins, perhaps especially in larger centres.