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

Submission Reference no: 160
Candor3 Limited
Ph: 
Submitter Type: Business/industry
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**
1. We support this item. Not mandating medium to high growth councils could result in fragmented and disjointed planning which would impact infrastructure planning.

**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**
We suggest that encouraging either regional or local authorities to develop urban design guides to encourage urban design outcomes that are appropriate for the needs of that district or region.

**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**
2. We support this item. Not mandating medium to high growth councils could result in fragmented and disjointed planning which would impact infrastructure planning. To create a coordinated, high-quality urban, integrated spatial planning then should create one FDS across each urban region as listed in tables 2 and 3 of the NPS-UD

**Clause**
Do you support the approach used to determine which local authorities are categorised as major urban centres? Why/why not?
**Notes**
We question why Dunedin, with a population of 130,000 and a 2.1% growth rate is not included in table 1.

**Clause**
Question 3. Do you support the proposed changes to FDSs overall? If not, what would you suggest doing differently?
**Position**
Yes
**Notes**
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**  
Recommend consideration be given to having a more central government lead

<table>
<thead>
<tr>
<th>Clause</th>
<th>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?</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Position</strong></td>
<td>Unsure</td>
</tr>
<tr>
<td><strong>Notes</strong></td>
<td></td>
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</tbody>
</table>

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<tr>
<th>Clause</th>
<th>Do you support the features of a quality urban environment stated in draft objective O2? Why/why not? (see discussion document, page 26)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Notes</strong></td>
<td>If urban design guides are to be encouraged to be developed, that may achieve the objective of this policy (see question 1)</td>
</tr>
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<tr>
<th>Clause</th>
<th>Question 5. Do you support the inclusion of proposals to clarify that amenity values are diverse and change over time? Why/why not?</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Position</strong></td>
<td>Yes</td>
</tr>
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<td><strong>Notes</strong></td>
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<tr>
<th>Clause</th>
<th>Do you think these proposals will help to address the use of amenity to protect the status quo?</th>
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<tr>
<td><strong>Notes</strong></td>
<td>Amenity values of particular suburbs have been used under the RMA to prevent intensification in areas well serviced by infrastructure and services. It is unclear if the proposal will reduce the frequency of this.</td>
</tr>
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<tr>
<th>Clause</th>
<th>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)</th>
</tr>
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<tr>
<td><strong>Position</strong></td>
<td>Yes</td>
</tr>
<tr>
<td><strong>Notes</strong></td>
<td>Note that if there is merely a direction to intensify there is no obligation to undertake this leading to additional sprawl</td>
</tr>
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<tr>
<th>Clause</th>
<th>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?</th>
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<tr>
<td><strong>Position</strong></td>
<td>Yes</td>
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<tr>
<td><strong>Notes</strong></td>
<td>Consider that the provision of public transport should be included (i.e. Transport Oriented Development)</td>
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<tr>
<th>Clause</th>
<th>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)</th>
</tr>
</thead>
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<tr>
<td><strong>Position</strong></td>
<td>Yes</td>
</tr>
<tr>
<td><strong>Notes</strong></td>
<td>Recommend a more prescriptive approach to public transport walking distances (400m for buses, 800m for rail)</td>
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<tr>
<th>Clause</th>
<th>What option/s do you prefer for prescribing locations for intensification in major urban centres? Why?</th>
</tr>
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<tr>
<td><strong>Position</strong></td>
<td>Option 2 (the prescriptive approach)</td>
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<td><strong>Notes</strong></td>
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</table>
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
Changes to the timing of development may affect council’s ability to plan key infrastructure projects anticipated in their LTPs.

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

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

Position
Option 3: removing the ability for local authorities to set minimum car park requirements in areas providing for more intensive development.

Notes
However, we do consider that enforcement of parking maximums is necessary and these should take into account the accessibility of an area to active modes and existing/proposed public transport (ie that there is an alternative mode choice). Sharing of standards for common/public parking areas with a mix of land uses is also supported.

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

Position
No

Notes
Differing regions have different requirements which may not be fully understood by central government.

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
Unsure

Notes
It is not understood what bodies will undertake the monitoring as ‘urban environments’ is unclear.

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

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

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
Unsure

Notes
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**