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?

We are supportive of a National Policy Statement on Urban Development that aims to deliver quality urban environments and make room for growth. We are supportive of a consistent approach to the way that plans, objectives, policies and rules that relate to the management and development of urban areas are conceived and written. We are supportive of less prescriptive rules around controls on development in favour of strengthened objectives, policies and zonings that seek to allow, encourage and promote increased density and variation in residential typologies across urban areas. We are supportive of more thought, direction and discretion being given to the design of medium, high density and mixed-use development across New Zealand. In order for the implementation of successful medium to high density development, there must be a focus on quality. We think that the National Policy on Urban Development should direct Councils and District Plans to be clear about the types of development envisaged for an area, particularly areas identified for residential intensification and mixed-use development. Plans should give clear indication of the changes that are expected to occur as a result of the expected type of development. We would also like to see more consideration given to the positive impacts of new development within an existing area.

The RMA is the primary legislation for controlling land-use and development. In general, the existing resource consent process does encourage collaboration between the Council and land developers to provide development outcomes that achieve the aims of the RMA. Over time however, the RMA and District Plans have focused in on the immediate effects of development and fail to consider the wider positive impacts of new development, particularly higher density development that promotes compact urban form and the efficient use of land and resources. Resource consents that trigger notification through
breaches of permitted development standards bring uncertainty, delay and cost to projects. Often these breaches are relatively minor, or should not be unexpected in areas experiencing intensification. The result is that medium and high-density development is often curtailed or stunted in areas that can accommodate intensification and the ability for urban areas to grow sustainably is impacted. In a city like Wellington, the topographical challenges are typically ill-conceived in the District Plan and thus create further uncertainty and delay through the consenting process.

The Building Code is another tool that should be considered in improving the quality of the built environment in New Zealand. Raising minimum building standards through improvements to the Building Code by targeting specific areas, for example requiring thermally broken double glazing, good ventilation, and higher levels of insulation as standard on residential buildings, will lead to higher quality individual dwellings over time and provision of warm, dry and healthy homes to be constructed as a minimum.

Methods to restrict private instruments such as Consent Notices being attached to new developments that restrict the use of land over and above the District Plan should be considered.

2. Do you support the approach of targeting the most directive policies to our largest and fastest growing urban environments? Why/why not? – Do you support the approach used to determine which local authorities are categorised as major urban centres? Why/why not? – Can you suggest any alternative approaches for targeting the policies in the NPS-UD?

The provisions should be primarily targeted towards the largest and fastest growing areas, but that doesn’t mean that other areas should not be encouraged, or required, to engage in best practice spatial planning and promoting new development that is sustainable and promotes and achieves quality urban environments. District Plans should be used to create more sustainable places rather than continuing with the status quo.

Consideration could be given to areas not identified as being ‘major centres’ engaging in spatial planning and FDS development at a regional scale. Although not identified as major centres it is still important for places to develop sustainably, promote efficient use of land
and resources and protect areas from over-development and sprawl. Smaller councils should be encouraged to consider what type of development they require and incorporate best practice urban development models into their plans in order to achieve efficient use of land and sustainable development.

Regions or areas adjacent to high growth areas (such as Palmerston North and Horizons Council in relation to Wellington) should be required to work with these major centres to identify opportunities for future development considerations. Significant infrastructure improvements (such as improvements to train lines, or large roading projects such as Transmission Gully) can have impacts beyond major centres. Infrastructure improvements or other developments may make areas such as these more significant to larger centres over time, or they may already themselves be relatively significant as places where people who work in larger centers live.

Sustainable and high quality urban environments should be promoted across New Zealand. The provision of higher density development in sustainable locations and the variation and positive benefits this type of development can bring should be an objective of all urban development in New Zealand.

3. Do you support the proposed changes to future development strategies (FDSs) overall? If not, what would you suggest doing differently? – 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? – What impact will the proposed timing of the FDS have on statutory and other planning processes? In what way could the timing be improved?

In general we are in agreement with the provisions for FDSs in directing Councils to consider and provide for future business and housing growth needs.

We have particular interest in the Wellington region and are involved in development across the region. We strongly feel that the Wellington region as a whole, which includes five major urban centres, should have to produce a combined FDS/Spatial Plan. We feel that places such as the Wellington region would benefit from the development of a combined FDS at a regional scale that considers the development of the urban area of the region (and
potentially beyond) as a whole. This may not be the case for all major centres. It does not make sense for housing and business development, and infrastructure plans to be developed separately. That is not how the region functions. The region is built upon a shared transport system that connects Wellington City and harbour to the Hutt Valley and Wairarapa, and the West Coast (Porirua, Kapiti and further afield). People live and work across the region and the FDS for the major urban centres in this region should reflect this.

District Plans across the region should also be required to be as similar as possible. In addition to the requirements of the National Planning Standards, these should include requirements for similar zonings within the region, particularly for residential or business zones. That is, a General Residential Zone in Lower Hutt should have similar development rules and standards and similar design guidance as a General Residential Zone in Wellington. Similarly for higher density or mixed use zones and business zones. That is not saying all areas need to have all zones, but that similar zones should be encouraged across the region. Higher density or mixed-use areas in Upper Hutt or Kapiti should have similar zone descriptions or objectives, as well as associated rules and standards, to those in Wellington or Lower Hutt. This could potentially encourage higher density development to occur by proxy in traditionally lower density areas and reduce the potential for more parochial forces to unnecessarily stymie development through ‘local’ interpretation of what more intensive development looks like, and the rules and standards that guide it. A regional-scale lens should be applied to the consideration of an area’s regional potential when District Plan rezoning is considered.

Region-wide planning should seek to identify development opportunities in a regional-scale context across different council areas (i.e. to not to under-develop or under-zone significant areas of opportunity across the region due to more ‘local-scale’ or short-term development occurring in the meantime). Region-wide planning should seek to protect or promote the development of regionally significant areas or infrastructure. For example, transport hubs such as train stations should plan for appropriate provision of car and bike parking, and areas surrounding them should be rezoned to accommodate higher density housing or business and mixed-use development. A point of interest here is that Wellington Railway Station predominantly links to suburbs that are not in Wellington City, and that are significantly less dense than suburbs in Wellington. There is no region-wide lens being applied to the development of these suburbs to allow higher density development in places...
with great access to the Wellington CBD. Lower Hutt has recently notified Plan Change 43, which is a start, but how much of this proposal is considering these areas and the future development in relation to the regional scale?

Region-wide planning should require all Councils to engage large public and private landholders (such as themselves or for example, Kāinga Ora or Kiwirail) to identify areas where either higher density (re)development or infrastructure could occur across the region, and how this could be achieved. Consideration should be given to different development models required to achieve this, whether that be consideration of regional development agencies or public and private partnerships. Regionally important developments could be used to ignite interest in the potential of areas and be a precedent for the type of quality development that is signaled to occur. Spatial planning at this scale can also help with the effective provision of major infrastructure, new or upgraded hospitals, schools and other community infrastructure.

Consideration should be given to the timescales involved in the consultation, research and production of an FDS, and the work required to produce or update this every three years. Whilst it is important for these strategies to remain relevant, there is a lot of work involved in the Schedule 1 process. We are concerned that this may hinder the development of District Plans which are ultimately what guides development. Consideration should be given to how this process can be efficient and effective.

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?** – Do you support the features of a quality urban environment stated in draft objective O2? Why/why not? – **What impacts do you think the draft objectives O2–O3 and policies P2A–P2B will have on your decision-making?**

In principle we support high level national direction on the features of quality urban environments. This could be in the form of National Design Guidance that provides a structure for local design guides and seeks to achieve high quality outcomes with regard to the design of urban areas though District Plans. This should be non-prescriptive but could be based upon best practice design guidance such as CPTED or urban design principles.
Direction could also be given in the development of zonings, objectives and policies that seek to promote intensification and sustainable higher density development and highlight the amenity values and positive attributes different types of higher density development can bring to a place generally. This guidance needs to be balanced alongside, and needs to consider, the local context and should not restrict variation and novel solutions to site specific conditions or context.

We would welcome an appropriate suite of quality guidance tools that would assist our pathways through the consenting process. Within the Wellington region we are seriously hindered by a lack of suitable Design Guides within the local District Plans. The current Design Guides are inadequate for the assessment of medium to high density residential development. We find ourselves in a constant challenge where we use the Auckland Design Manual and NSW Apartment Design Guide to structure justification arguments around what good actually looks like, whilst the decision-makers only have their current guidance documents to reference and make their assessment on.

5. Do you support the inclusion of proposals to clarify that amenity values are diverse and change over time? Why/why not? – Do you think these proposals will help to address the use of amenity to protect the status quo? – Can you identify any negative consequences that might result from the proposed objective and policies on amenity? – Can you suggest alternative ways to address urban amenity through a national policy statement?

We are supportive of the inclusion of proposals that seek to clarify that urban areas are dynamic and that amenity values are diverse and change over time. Currently District Plans tend to describe existing urban environments, and therefore the amenity values that are identified, or described, tend to relate to the existing environment. District Plans currently tend to focus on specific amenity values related to individual sites and rules have developed to address these (recession planes for example).

Amenity values are important in identifying the key characteristics, or qualities of a place but tend to be too prescriptive and focus on specific amenity related to the existing environment. We feel there should be a greater focus, or weight, attributed to the amenity values that relate to the future environment and the positive amenity values and other positive attributes that more sustainable forms of development can bring. These can be immediate benefits, or could be at a larger scale (promoting sustainable urban form for
example). These could be identified through a ‘zone description’ or objective for a zone that describes the qualities of development that are envisioned for a place. This zone description would need to be integral to the consideration of, and decisions upon, development proposals. The general positive impacts that the proposed future environment will should be made clear in these descriptions.

This will always be a contentious change as it should promote more intensive development to occur with less consideration or weight placed on the immediate effects of development. The same conflict will arise between the existing development in an area and that of a proposal. Most development occurs on relatively small sites with existing neighbours that are used to a particular condition. Any change to that is often seen as a threat.

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?**

Yes, in principle. The direction needs to create a regulatory environment that promotes sustainable forms of development such as intensification and brownfield redevelopment. This type of development needs to be prioritised over greenfield development which tends, or has traditionally been, generally more feasible or likely to be taken up. Identification and removal of barriers to intensification should be prioritised. Restriction on greenfield development, or a high bar based upon alternative development options having been exhausted should be considered.

7. **Do you support proposals requiring objectives, policies, rules, and assessment criteria to enable the development anticipated by the zone description? Why/why not? – 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? – Do you think that amenity values should be articulated in this zone description? Why/why not?**

We are supportive of the use of zone descriptions and associated objectives, policies, rules and assessment criteria, such as design guides, in District Plans. We understand the proposal
to be that the zone description describes a type of development that is sought to be built in a particular zone (for example, three storey townhouses). The proposed development is then judged against this zone description, and the associated objectives, policies and rules.

We think that ‘typical characteristics’ could be identified for the type of development or environment described by the zone. These could be similar to permitted standards in terms of bulk and location standards. However, we feel strongly that medium, high and mixed-use development should have either a discretionary or restricted discretionary activity status. We do not think that development at this scale can achieve high quality urban environments, or high quality internal outcomes, unless the design is properly considered and critiqued.

Higher density developments are complex and need to consider a wide range of development outcomes. This process benefits from quality control checks and critique from local authorities. Permitted standards can result in a ‘race to the bottom’ or promote maximum amount of development that is allowed by the rules with little consideration of other important design outcomes, such as the interior environment or communal and public spaces and conditions. We feel that these design outcomes would be difficult to promote using permitted standards. The other risk of permitted standards is that sites are under-developed to avoid resource consent, which potentially degrades the ability of an area to achieve sustainable development and high quality urban environments.

8. **Do you support policies to enable intensification in the locations where its benefits can best be achieved?** Why/why not?  
   - What impact will these policies have on achieving higher densities in urban environments?  
   - What option/s do you prefer for prescribing locations for intensification in major urban centres? Why?  
   - If a prescriptive requirement is used, how should the density requirements be stated? (For example, 80 dwellings per hectare or a minimum floor area per hectare).  
   - What impact will directly inserting the policy to support intensification in particular locations through consenting decisions have?

Prescriptive standards may or may not be useful but would need to be carefully considered as density rules or minimum floor area rules can have unintended consequences and outputs (such as the provision of smaller unit types in preference to type of development is actually needed, or larger house footprints inefficiently using up land). Bedrooms per
hectare may be a more useful measure to consider over a generic ‘density’ measurement. It may also be useful to reference prescriptive standards in the description of development types as a guide as to what is ‘typical’, but allow discretion so that each development can be assessed on its own merits.

We are more supportive of a descriptive standard. We feel this approach has more scope to enable and achieve intensification when combined with a collaborative and open development process. The descriptions, however, need to be fairly robust and clearly explain what is expected of intensification. It needs to be clear how the justification for a proposal will be assessed and how it can meet the development objectives. It needs to provide the right framework for enablement of intensification, yet it needs to allow flexibility for the right mix of sizes and types of dwelling to be incorporated – this can’t be measured by the dwelling per hectare model. Different dwelling sizes and types will have different needs with regard to outdoor space requirements, and the focus should be on demonstration of quality of space relative to dwelling type and size.

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? – How could the example policy better enable quality urban development in greenfield areas? – Are the criteria in the example policy sufficiently robust to manage environmental effects ensure a quality urban environment, while providing for this type of development? – 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 onto future homeowners and beneficiaries of the development)? What impact will this have on the uptake of development opportunities? – 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?

In principle we could support this, however, there needs to be a high bar for this type of development to occur. As mentioned above, priority should be given to intensification and brownfield redevelopment. It should not be an easy process to bypass more sustainable development types in order to develop greenfield sites. If FDS are to be updated every three years, this is perhaps the place where specific proposals such as this could be considered to
be included in the next iteration of an FDS. Where development of this type is to occur, consideration should be given to the costs of installation and upkeep of infrastructure, and the principles of achieving high quality urban environments should be integral.

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?** – **Which proposed option could best contribute to achieve quality urban environments?** – **What would be the impact of removing minimums in just high- and medium-density, commercial, residential and missed-used areas, compared with all areas of a major urban centre?** – **How would the 18-month implementation timeframe impact on your planning processes?** – **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?**

We are most supportive of option 2, perhaps assessed on a site by site basis.

We are supportive of less prescriptive car parking requirements for development in close proximity to transport hubs or mixed-use development areas that provide for local services. We encourage more investment and potentially subsidies of alternative methods of transport and new technologies such as electric bicycles and vehicles. In addition to reducing car parking requirements, there does need to be much more investment in alternatives, whether that be public transport – routes, frequency and reliability, investment in infrastructure such as multistorey carparks next to train stations (park and ride schemes in particular in the Wellington Region and the Hutt Valley) and in local mixed-use centres, car-share schemes, walking and cycling infrastructure. It needs to be easy and cost effective to use alternatives to a car.

We are supportive of the principle of choice when it comes to carparking provisions within a development. An astute developer will understand their target market and balance parking provisions to suit if they had the choice. The current requirements for parking stifle ingenuity and the ability for developers to tailor their offering to suit the market, and ultimately the choice for residents to not have a car.

The document lists some examples of situations where car parks could be used for multiple uses at different times of day. In theory this is a good idea, but it is not often that private
businesses will agree to having competing uses able to use their car parking spaces. Maximum parking standards could be considered for some types of commercial development, and consideration of parking ‘hubs’ for a variety of commercial uses rather than each having their own designated parking area.

11. **Do you think that central government should consider more directive intervention in local authority plans?** – Which rules (or types of rules) are unnecessarily constraining urban development? – 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? – Should a minimum level of development for an individual site be provided for across urban areas (for example, up to three storeys of development is a permitted activity across all zones)? – 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

High quality development should be encouraged wherever possible. Allowing for more development in urban areas should be the priority but not at the expense of quality. High quality intensification requires an element of control to be imposed on outcomes. Resource consents can provide this check on quality.

Government intervention should perhaps come in the form of requiring local authorities to develop clear and consistent planning documents and to work across boundaries to address development issues. This could include ‘zone templates’ or guidance and best practice examples on creating zoning specific types of high density development that promote quality outcomes without being too prescriptive.

We are not specifically opposed to individual rules in District Plans per se. Rules and standards provide a permitted baseline that can create a clear and understandable ‘development envelope’ within which a development can occur. These types of rules and the creation of permitted ‘development envelopes’ have worked well in traditional New Zealand residential developments where they seek to ensure minor adverse effects on the surrounding neighbours and environments.
In most areas of New Zealand, land for development has historically been abundant. As a result, planning rules have developed that take a laissez-faire approach to controlling development at a traditional residential scale with relaxed permitted standards controlled by a suite of rules usually based around site coverage, recession planes, maximum building height and minimum site size, to name a few. Setting aside some concern around the ability to properly determine the effects that this high level of permitted development could have over a large area (which in theory is assessed by the Council before zoning large swathes of land), these rules and permitted baselines can be relatively easy to interpret and reduce costs for small scale residential development. This therefore potentially negates the requirement for resource consent of a single detached dwelling on a 400sqm site, for example.

As residential site sizes have decreased (and house sizes have increased) and higher density and multi-unit developments have become more prevalent, the boundaries of the permitted ‘building envelope’ created by these rules come under increasing pressure. In a vacuum of clear objectives and policies and descriptive information about what amenity value means, permitted rules and standards have become inexorably linked, or come to be understood as, hard lines that when breached by development suddenly render the proposal as unacceptable, and concurrently have a detrimental effect on local amenity. We consider that rules that allow prescribed levels development to occur as of right, and the resulting ‘permitted building envelopes’ are not particularly useful in higher density development areas where developments are complex and attention is required to ensure high quality external and internal site conditions. In order to achieve high quality multi-unit or high density development, that in turn helps to create high quality urban environments there needs to be control over the design of these developments. Some form of discretion or assessment is required on developments of this scale to enable quality outcomes to occur and promote positive outcomes.

The emphasis needs to be on promoting, enabling and controlling high quality high density urban development. In our opinion this is not achieved by removing development rules and standards to allow development to occur without resource consent. It needs to be clear what is deemed to be a negative effect, with relation to the particular zone, for high density development and this needs to then be considered in the design of a development. When building increased density it is inevitable that there will be impacts on the existing
environment and existing neighbours. Where increased density is anticipated for the zoning it should be enabled to happen with relative certainty, avoiding the need for extensive notification, but should also be controlled in a way that promotes, enables and allows for high quality development to take place.

As addition, the concept of permitted baselines, and of ‘non-fanciful’ development are not useful as a test against what is anticipated in areas zoned for higher density, especially on larger sites in more traditional areas.

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?**

Yes in principle, but would be good if national government could provide data or clear guidelines on relevant market indicators to avoid over analysis.

Councils should monitor the impact or uptake of development in particular zones through analysis and mapping of building consent information, and through recording data on the type of development occurring in areas or zones. This information should be used to inform decisions and find successful zoning setups. It may also allow trends in development to appear over time and feed into FDS planning and development.

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? – 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? – How do you think local authorities should be directed to engage with Māori who do not hold mana whenua over the urban environment in which they now live? – What impacts do you think the proposed NPS-UD will have on iwi, hapū and Māori?**

We are supportive of proposals to involve iwi, hapū and whanau in the process of plan making, and incorporate and reflect their interest and values in plans and design guides so that they can be considered and incorporated in development proposals.
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? Why/why not?

15. What impact will the proposed timing for implementation of policies have?

We are currently working in a planning framework that is at odds with the notion of urban intensification. Bringing an NPS into play that will provide a means of guidance for when the District Plan falls short of the high level political and social objectives around intensification would be incredibly useful. We have a housing crisis now, and having the necessary tools on hand as soon as possible to assist with creating high quality intensification is a high priority.

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

Focus on quality.

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 and include any suggestions you have for addressing these issues.

Unsure, however a wider regional lens would be useful in incorporating the requirements from other NPS documents such the NPS on Productive Land or the NPS on Indigenous Biodiversity. We would encourage these documents to speak to each other. There may be some input from these areas in creating high quality urban environments, for example consideration of methods of promoting biodiversity in urban areas.

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.

We would like to see high quality, consistent design guidance being created that can be used widely across local authorities. It needs, wherever possible, to be non-prescriptive. This design guidance could combine existing sources of urban design, crime prevention and promote examples of best development practice. It should also promote consistency between councils in the format and content of design guides. It could also be used to reflect
the values and interests of iwi, hapū and whānau in terms of design considerations for development.

National Planning Standards should be encouraged where possible to increase consistency between District Plans across boundaries and the country generally. In addition to the provisions in the initial tranche of standards, other suggestions could include consistent zoning descriptions and objectives for different zone densities which may include consistent rules and standards and consistent design guidelines. As an example, higher density or mixed-use zones should have the same basic format and expected outcomes across the country. New development should be designed to be of its time and promote good urban and design best practice. Development should not be forced to be a pastiche of previous styles or character no matter how prevalent they are in a particular area. Existing historic buildings or places should be clearly identified and specifically protected. District Plans should include more consistent methods and rules around the protection of historic buildings, as well as native flora and fauna.