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

Submission Reference no: 169

Andrew Riddell

Submitter Type: Planning/urban design professional
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 The proposed objective setting out "quality urban environment" is too narrow. It needs to include references to vibrant public spaces, good mobility options, the full range of physical and intellectual recreation options, anticipating and planning for climate change.

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? Why/why not?
Notes The Government needs to provide support (financial support) to councils to give effect to the national policy statement, and actively advocate for regional policy statement and district and regional plan provisions to give effect to the national policy statement.

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 Any future development strategy needs to be broad enough to cover all aspects of a quality urban environment.

Clause
Do you support the approach used to determine which local authorities are categorised as major urban centres? Why/why not?
Notes no comment

Clause
Can you suggest any alternative approaches for targeting the policies in the NPS-UD?
Notes no comment

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
Requiring other local authorities to undertake a strategic planning process should be supported by central government resources -- $ and advisors

Clause
What impact will the proposed timing of the FDS have on statutory and other planning processes? In what ways could the timing be improved?
Notes
no comment

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
The proposed objective setting out “quality urban environment” is too narrow. It needs to include references to vibrant public spaces, good mobility options, the full range of physical and intellectual recreation options, anticipating and planning for climate change.

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 proposed objective setting out “quality urban environment” is too narrow. It needs to include references to vibrant public spaces, good mobility options, the full range of physical and intellectual recreation options, anticipating and planning for climate change.

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
no comment

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
Any clarification of amenity values must not downplay the importance of heritage and history to amenity values.

Clause
Do you think these proposals will help to address the use of amenity to protect the status quo?
Notes
no comment

Clause
Can you identify any negative consequences that might result from the proposed objective and policies on amenity?
Notes
Any clarification of amenity values must not downplay the importance of heritage and history to amenity values.

Clause
Can you suggest alternative ways to address urban amenity through a national policy statement?
Notes
no comment

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
| 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, and for managing cumulative effects. The danger is though that the zone descriptions will be so inclusive of development and protection form development that it will be as useless as the zone descriptions that are given in the National planning Standards. |

| Clause | Do you think that amenity values should be articulated in this zone description? Why/why not? |
| Notes | Maybe, if necessary. |

| Clause | What impact will these policies have on achieving higher densities in urban environments? |
| Notes | no comment |

| Clause | What option/s do you prefer for prescribing locations for intensification in major urban centres? Why? |
| Position | Option 1 (the descriptive approach) |

| 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 | no comment |

| Clause | What impact will directly inserting the policy to support intensification in particular locations through consenting decisions have? |
| Notes | How will that ensure there is good design? |

| 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 | This proposal is ad hoc planning. There are significant infrastructure implications. It is better to lead with infrastructure being put in place in areas currently identified for development, than allow greenfields development in random locations with a lack of integration and efficiency with respect to the provision of infrastructure. |

| Clause | How could the example policy better enable quality urban development in greenfield areas (see discussion document, page 37)? |
| Notes | Not relevant as I reject the concept of ad hoc greenfields development |

| Clause | Are the criteria sufficiently robust to manage environmental effects to ensure a quality urban environment, while providing for this type of development? (see example policy in discussion document, page 37) |
| Notes | Not relevant as I reject the concept of ad hoc greenfields development |

| Clause | 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 on to future homeowners/beneficiaries of the development)? What impacts will this have on the uptake of development opportunities?

**Notes**
Which ever results in lower costs for homeowners.

<table>
<thead>
<tr>
<th>Clause</th>
<th>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?</th>
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<tbody>
<tr>
<td><strong>Notes</strong></td>
<td>Not relevant as I reject the concept of ad hoc greenfields development</td>
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<table>
<thead>
<tr>
<th>Clause</th>
<th>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?</th>
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<tbody>
<tr>
<td><strong>Position</strong></td>
<td>Somewhat</td>
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<td><strong>Notes</strong></td>
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<thead>
<tr>
<th>Clause</th>
<th>Which proposed option could best contribute to achieving quality urban environments?</th>
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<tbody>
<tr>
<td><strong>Notes</strong></td>
<td>Loaded question. I would go for Option 4 - councils retain the ability to regulate the requisite number of car parks and, instead, rely on advocacy at the plan stage to control and limit parking.</td>
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</tbody>
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<tr>
<th>Clause</th>
<th>What would be the impact of removing car park minimums in just high- and medium-density, commercial, residential and mixed use areas, compared with all areas of a major urban centre?</th>
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<tr>
<td><strong>Notes</strong></td>
<td>no comment</td>
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<th>Clause</th>
<th>How would the 18 month implementation timeframe impact on your planning processes?</th>
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<td><strong>Notes</strong></td>
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<tr>
<th>Clause</th>
<th>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?</th>
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<tbody>
<tr>
<td><strong>Notes</strong></td>
<td>Central government providing funding assistance for public transport.</td>
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<th>Clause</th>
<th>Question 11. Do you think that central government should consider more directive intervention in local authority plans?</th>
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<tr>
<td><strong>Position</strong></td>
<td>Somewhat</td>
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<tr>
<td><strong>Notes</strong></td>
<td>Especially needed are directives to ensure good design and public spaces.</td>
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<th>Clause</th>
<th>Which rules (or types of rules) are unnecessarily constraining urban development?</th>
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<tr>
<td><strong>Notes</strong></td>
<td>no comment</td>
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<table>
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<tr>
<th>Clause</th>
<th>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?</th>
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<tr>
<td><strong>Notes</strong></td>
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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, you need to respect differences in areas -- geographic, mobility, amenity.

Clause
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?

Notes
Directively worded policies and require consents to not be inconsistent with policies.

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
Part of honouring Te Tiriti

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
no comment

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
no comment

Clause
What impacts do you think the proposed NPS will have on iwi, hapū and Māori?

Notes
no comment

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
Somewhat

Notes
Also need to consider the consumers of development.

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

Notes
no comment

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

Notes
Central government/local government joint funding of research and plan and policy development

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
These tensions/conflicts need to be dealt with on a case by case basis.
**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**

No

**Notes**

Do not include my address or email in any publication or on the web site.

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**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.

**Notes**

Do not include my address or email in any publication or on the web site.

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**Clause**

Contents of submissions may be released to the public, if requested, under the Official Information Act 1982. Please indicate below if you consider all or part of your submission should be withheld.

**Notes**

Exclude my address and email.

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**Clause**

Part(s) of my submission I believe should be withheld and reason(s) for withholding

**Position**

I have included in the notes box below the reason(s) I consider my submission or part(s) of my submission should be withheld.

**Notes**

My address and email should not be released.