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

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Heidi O’Callahan
New Zealand

Submitter Type: Individual
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
Strongly Support. The current urban environment is unhealthy. The polluted air we breathe and the danger we face on our bikes and even walking is all stemming from bad urban planning. But I’ve noticed effects that go further. My children’s friends are given little freedom, as their parents are too concerned about traffic danger. My suburb hasn’t been able to intensify, so it’s become too expensive. No longer can the community groups I’m part of retain young people with energy - once they leave their parents’ home or a rare affordable flat (usually only on the market temporarily while the owners are overseas) they have to leave the suburb. It’s not affordable. So my progressive, community minded groups are just becoming more elderly, and the younger middle aged people are too busy paying their mortgages to become involved. The housing crisis is cutting to the very heart of my community, creating social poverty. We also can’t have basic things, like good street lighting - so lots of people don’t take the bus because they don’t want to walk home at night in the dark, due to the danger of slipping on vegetation or on the random inorganic waste people still plonk out on the footpath. Nor can we have water fountains in local parks and on footpaths at the level needed to prevent people buying water in bottles - because the rates are apparently not there to support them. If operating the stuff needed for a society to function requires more people to pay rates to cover it, let those people in! Our towns and cities have sprawled too far, covered too much land. Auckland needs serious repair, and this must involve brownfields development only. Any greenfields development simply makes things worse. We have so much opportunity to intensify well, but this will not happen unless it is directed by government. There are too many vested financial and development/trucking/construction interests wedged to greenfields development for it to stop unless government directs this to happen.

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
These other tools need to be used as well. We are coming from behind on climate change, since in April this year, the State Services Commission confirmed to me that they have “not received or given any directions from government or to government departments in relation to reducing carbon emissions, reducing the nation's travel (vehicle km travelled) and about land use planning to reduce travel need and thus carbon emissions.”

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
Oppose. Even in the design of rural eco-communities, putting the dwellings together intensively makes for a healthier social and physical environment. Certainly our smaller cities and towns can adopt a denser form. The car dependency of sprawl applies to all settlement sizes. By the time there’s no more “brownfields sites” or “single house development” to convert to a more compact development, we’ll be well on our road to understanding the impacts of climate change. If all is well and good we can loosen this up in 30 years’ time. If not, we’ll appreciate becoming more compact in cities and in towns. Cutting out the urban areas of Whangarei, Rotorua, Gisborne, Napier-Hastings, New Plymouth, Palmerston North, Nelson-Tasman, Marlborough, and Dunedin makes no sense; many more towns should be added in instead.
Clause
Do you support the approach used to determine which local authorities are categorised as major urban centres? Why/why not?
Notes
No. See above.

Clause
Can you suggest any alternative approaches for targeting the policies in the NPS-UD?
Notes
All towns and cities.

Clause
Question 3. Do you support the proposed changes to FDSs overall? If not, what would you suggest doing differently?
Position
Yes
Notes
Support, overall. But: it should be extended to include all towns. It should only be directing Councils to go “up”, not “out”. The last thing we want is for Councils to find that intensification is finally working well, under better planning rules, and to have to sprawl further because this “up and out” requirement has been bedded into plans. The difficulties that must be overcome to enable brownfields development - including upgrading pipe infrastructure and getting the traffic dominance lessened - is only going to happen when business is prevented from continuing with the greenfields nonsense.

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
Support, in general. But amenities for a quality urban environment must be focused on the “public luxury - private austerity” model that makes for excellent social health. Councils need to be directed to provide excellent public facilities and amenities in our streetscapes, parks, active and public transport networks. Also, things like common areas within apartment building complexes. Councils also need to be directed to require active transport amenities in developments to reduce car dependency, and this can be justified on the basis of decades of subsidy to car travel.

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
Strongly support. What I value in amenity is different to what my neighbours do, and completely different to what my grandparents did. Amenity values, if anything, should be focused on bringing change. Climate change should be dictating change in our behaviour, whereas currently the amenity values seem to be stuck in keeping people from changing.

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
Support. But only in the existing urban area, not in greenfields developments. Direction should be given that greenfields development is no longer allowed.

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
Support. We have the problem currently in Auckland that developments consented and being built in the THAB zone do not in any way fit the description of the zone; they are single storey or two storey sprawl with maximum site coverage. Council are doing nothing to stop it, even where site coverage and permeability calculations in the applications have been pointed out to be false. Given this background, I think the NPS may need to go further, with clear penalties to council if they continue with this
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  Strongly support. This is important. Directly inserting the policy to support intensification in particular locations could overcome the problem we have of local boards proposing to “schedule” entire village centres for “heritage value”... on those exact transport corridors where quality three and four storey development would be so nice, and introduce so much more housing into the city. Directly inserting the policy to support intensification in particular locations could replace the focus on heritage so we can attend to the problems of our wahine suffering “survival sex” and our children having to move from garage to auntie’s to car to uncle’s and shifting school each time. Climate change, homelessness and inequity mean that heritage has no place anymore in this discussion, and I’m saying that as a long-time member of Heritage NZ. The only exemptions I would suggest are permissible are: Protecting Maori historic heritage, and taonga (such as wāhi tapu). Protecting the coastal environment, wetlands, lakes, rivers, and significant areas of old-growth native vegetation. Avoiding areas with significant natural hazards, such as flooding, coastal inundation, and liquefaction. Land subject to designations for sustainable transport corridors When making District Plans, the burden of proof needs to be put onto the Council to prove that the exemptions didn’t have a negative net impact on urban quality, sustainable transport modes or development capacity.

Clause  What option/s do you prefer for prescribing locations for intensification in major urban centres? Why?
Position  Option 2 (the prescriptive approach)
Notes

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  Strongly oppose. This question undermines all the careful planning of the Future Development Strategies. I utterly oppose any greenfields development. That we have sprawled way too far and that any further sprawl adds high-vkt per capita households is clear. The effect of any greenfields development is massively destructive. It must stop.

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  Strongly support. There should be no parking minimums. But there should be maximums. Councils should be being directed to monitor and remove parking supply everywhere, incrementally, in order to reduce traffic. Instead, they are actually adding more parking at their own facilities, or financially supporting tenants to do so. Shrinking parking maximums should be applied everywhere for climate action. We need sustainable transport throughout the regions, and it is undercut by all the subsidised roading and parking. So abolition of parking minimums must happen everywhere, not just in major urban areas. It’s also important to go beyond just abolishing the rules themselves. A lot of parking requirements aren’t imposed as rules, but as conditions of resource consents. Therefore I suggest: The NPS include a mandatory policy for district plans, saying that increased competition for on-street and off-street parking cannot be considered an “effect”, and that the presence of carparking is not a form of amenity. The NPS not allow the provision of parking to be considered as mitigation of negative effects on traffic. The NPS disallow resource consent conditions requiring the provision of parking, or requiring existing parking to be kept. The NPS insert a mandatory policy stating that on-street parking management and the design of public roads are the primary tools by which councils manage traffic effects. There is no point in an 18 month delay. This should take immediate effect.

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  Council should be able to set maximums without having to provide evidence as to why - this would simply delay action and tie Council up in processes. Maximums are required because parking induces traffic.
Clause
Question 11. Do you think that central government should consider more directive intervention in local authority plans?
Position
Yes
Notes
Support. In the major centres, I support being very prescriptive. Basic policies, objectives and rules for each zone should be set by the NPS, with Councils able to relax some of the rules to add more intensity or add more rules that don’t affect intensity. Default rules should include: tree canopy levels for streetscapes and public places, as this has a huge effect on amenity values while allowing private property to intensify activities in each zone, which should be as broad as possible, to allow small-scale neighbourhood services like dairies, cafes, community workshops, composting hubs, doctors’ offices, kindergartens, small sound-proof music studios and small concert venues in both mainly residential and commercial areas. Standards for canopy coverage, height limits, recession planes, site coverage, impervious coverage, front, side and rear yards, common wall rules, accessory building rules. Performance standards – noise limits, and opening hours for work-from-home activities.

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
Strongly support.

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
Strongly support. I imagine Māori development expertise can easily point the direction to changes that Councils should be directed to make, in allowing co-ownership and cohousing, for example.

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
I don’t know but I would hope that councils can vastly improve how they incorporate Māori perspectives, and know that to move forward as a country, a basic first step is to provide Māori with the power to fix the system they have experienced as working against them.

Clause
Question 15. What impact will the proposed timing for implementation of policies have?
Notes
I can see no reason to delay the prescriptive requirements on particular policies, objectives, and rules in district plans. Carparking requirements and ability to alter amenity values should be altered as soon as possible. Predatory delay is a real problem for the progress this government is trying to make. Don’t allow it to happen on this too.

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.
Notes
My views on the NPS on highly productive land doesn’t provide any tension with my views on this NPS for urban development. In both cases, development in greenfields areas must stop.