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

Submission Reference no: 202

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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
NZ has a housing crisis. NZ has an infrastructure deficit. NZ has a transport system that is not ready to respond to climate change. Affordable housing is not possible if both land use or transport do not support it. Auckland particular needs to be tranformed into a compact city. It needs to support transit oriented development. It needs to be easier to redevelop existing brownfields around transit nodes to allow more people to live closer to their needs. The response to climate change requires resilient and sustainable cities. City that sprawl can not effectively support the required infrastructure need to respond to this crisis. The status quo model of greenfield development leading to an infrastructure deficit is a failure. These types of developments should only be supported if they shown not to contribute to climate change. Infrastructure should be built ahead of development.

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
We can not continue to build our largest urban centers like we have in the past. "Aotearoa is becoming increasingly urbanised, with around 99 per cent of all population growth occurring in urban areas." Much of this growth and need to respond will be in the major urban areas. These centers should have the resources to produce highly developed plans. Smaller councils with less resources should have a basic spatial plan and have support to develop higher level plans if demand is created by neighbouring Major Urban Centers.

Clause
Do you support the approach used to determine which local authorities are categorised as major urban centres? Why/why not?

Notes
Yes.

Clause
Can you suggest any alternative approaches for targeting the policies in the NPS-UD?

Notes
No

Clause
Question 3. Do you support the proposed changes to FDSs overall? If not, what would you suggest doing differently?

Position
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

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 is different for different people, for different locations and at different times. Some people like soccer, other people like swimming. Some people like parks, other people like malls. Amenity comes from both public, semi-public and private spaces. It is effected by future developments - either transport, infrastructure or land use changes. For example, more families (like in Onehunga) mean demand on local schools, green spaces, transport spaces and community function is increasing dramatically. This local context is also embedded with a city, regional and national context. Managing and mitigating the conflicts between needs at different levels needs a more holistic approach.

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

Clause
What impact will these policies have on achieving higher densities in urban environments?
Notes
Intensification must take transit into account.

Clause
What option/s do you prefer for prescribing locations for intensification in major urban centres? Why?
Position
Option 2 (the prescriptive approach)
Notes
Good intensification requires good planning. This means investment in good design and infrastructure.

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
Targets are inherently tricky. See Goodhart's law. Nevertheless, I prefer people or floor area per hectare vs dwellings per hectare.

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 undercuts the Future Development Strategies.

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
Parking minimums need to go. They distort the planning process. They enforce a urban development style that does not support intensification. They also impose a wider demand on transport planning. NZ should follow the Japanese model and require proof of a private parking before registration.

**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**  
Transport and thus parking should be managed via transport planning - roads and transit. Not land use planning, i.e. regulating the number of cars, not the number of car parks per person/dwelling.

**Clause**  
How would the 18 month implementation timeframe impact on your planning processes?  
**Notes**  
No. Developers will still build parking if they think it is needed.

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

**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**

**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**

**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**  
Yes  
**Notes**

**Clause**  
Question 15. What impact will the proposed timing for implementation of policies have?  
**Notes**  
Immediately remove parking minimums.

**Clause**  
Question A4. How could these policies place a greater emphasis on ensuring enough development capacity at affordable prices?  
**Notes**  
By factoring transport costs/time to work or education.

**Clause**  
Question A5. Do you support the approach of targeting the HBA requirements only to major urban centres? Why/why not?  
**Position**  
Yes  
**Notes**