10 October 2019

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Dear Ministers

Planning for Successful Cities

Bluehaven Holdings Ltd is one of the largest land developers in the Bay of Plenty region. Bluehaven controls significant land holdings in the Papamoa East Wairakei Growth Area.

The company is dedicated to best practice urban and suburban planning with a focus on addressing housing choice and attainability at scale, coupled with the right balance of community and commercial amenity provided to be provided for.

Bluehaven projects include:

- Golden Sands, an urban development area at Papamoa which has to date delivered over 2,500 residential units in total;
- Excelsa Village, a medium density urban residential area (77 units) with a walkable neighbourhood centre, and strong urban design outcomes, that was initially established in 2010;
- Newly constructed residential lots for medium density housing of over 300, which are closely aligned with the affordable threshold in Tauranga;
- Lifestyle Villages, which provide an affordable housing product in the market (currently under $250,000/unit). There are 116 units delivered and a further 151 planned. We have introduced this innovative typology using a leasehold ownership model for small dwellings;
- A new Town Centre with commercial, retail, government services, offices, employment and visitor accommodation uses. The Town Centre will incorporate an array of intensive housing typologies (1,200 planned) ranging from medium density detached dwellings, terraces/townhouses, medium rise apartments and live-work units;
- Several smaller neighbourhood centres, which has approximately 4,500m² of floor area currently operating and/or under construction.
- Over 10 passive reserves, targeting different users and age groups.

In recent years our projects have taken an approach which is closely aligned with the model of “growing out” with well-connected houses in greenfield areas with good infrastructure and multi modal accessibility.

Bluehaven generally supports the broad direction provided by NPS. The scope of the suggested direction, if well implemented, can bring about the needed change in the practice and culture of how urban land use is regulated.
Major Urban Centres

We support the closer focus of the policy on major urban centres, with the inclusion of the Tauranga urban area in this category.

The Region, City and District Councils within the Tauranga urban area have had difficulty in addressing the collective impact of their rules on the delivery of more intensive forms of urban development. National direction will support a needed shift towards this outcome.

It should be emphasised that the obligation to deliver on policies to enable urban intensification will rest on regional councils as much as city and districts.

Spatial Planning Framework

The intention to better integrate spatial planning into land use regulation is fully supported. Spatial planning requires long term, outcome focused collaboration between all stakeholders.

Spatial planning as a method can provide benefits at a range of geographic scales and should not be solely the preserve of regional scale planning. Bluehaven has engaged and has experience in spatial planning at several scales including Smartgrowth Settlement Pattern, RPS urban development, urban growth area structure plans, framework planning, comprehensive development consents and outline development plans for commercial centres.

Providing for Intensification

We agree that higher density living should not just be enabled in existing urban environments. As much, if not more focus, should be placed on intensification of greenfield areas where opportunities to maximise benefits are less constrained by the existing settlement pattern.

We frequently observe the opportunity and benefits of intensification being diminished through a perceived need by local government to increase the level and complexity of development regulation. This is an area where culture change is most needed.

With all forms of intensification, the local authority’s primary focus of resources and effort should be on infrastructure planning and delivery, robust and high-quality streetscapes and open space, active reserves and provision of effective public transport services. This is the area of spatial intervention that local government can create the greatest benefit and enhancement of livability that will support urban intensification.

The statutory authorities should equally consider all major urban nodes, rather than an historical tendency to focus on the CBD and associated environments. A CBD cannot possibly accommodate long term growth on its own. Council’s balanced investment in all major urban nodes will be very important to achieving intensification at scale.

Providing for further greenfield development

The Government is considering provisions that would direct local authorities with major urban centres in their jurisdiction to consider plan change requests for urban development in locations that are out of sequence.

This opportunity is already available though a request for Plan Change. However, effectiveness is diminished where the further greenfield development falls across territorial boundaries or infringes a regional policy limit. To be truly effective, this type of initiative needs to encompass consideration of private requests to change all relevant policies including local authority jurisdictional boundaries, Regional Policy Statement, long term infrastructure plans, development contributions policies, as well as changes to city and district plans.
Removing Minimum Carparking Requirements

These proposals are supported in principle as they will give tangible effect to the broad intent to bring about change in the practice and culture of how land use is regulated.

While there is some likelihood of parking overspill to streets, the consequences of this are not significant in the long term as behaviors will adjust. An urban form that embeds unsustainable activities is a far greater risk.

We agree that Option 3 (not regulating car parking using minimum parking requirements in higher density and commercial /mixed use centres) has the strongest nexus to wider policy direction on intensification. However, the policy should apply to activities rather than “areas” (assuming an area if the equivalent of zone).

Other Directive Intervention

We support the proposal to remove the ability to use rules that offer questionable benefits but increase costs.

Bluehaven supports the control of residential building height through defining the number of floors rather applying a fixed height. This method will better promote design innovation and better-quality internal space, while still maintaining a general consistency of building form and scale in a development area.

Coordinated Planning

Bluehaven supports provisions that require coordination and alignment with developers and all providers of urban infrastructure.

As noted above, spatial planning is a vehicle for promoting collaboration. Proper evidence-based planning (rather than ideology) that also taps into the knowledge of experienced developers, who have actual proven delivery, is also important and a means to getting things done.

Highly Productive Soils

This issue is so interwoven with urban development (urban expansion onto highly productive land is the “problem definition”) that the policy should be merged into one integrated and consistent policy.

We would be happy to discuss this submission at any stage.

Regards,