**Sustainability Options response to the NPS – Urban Development**

Sustainability Options is a social business with a purpose to work for the benefit of others with compassion and generosity. Our focus is helping communities live in more sustainable conditions now and for the future.

We’re extensively trained and experienced in building science, home performance and the impacts poor housing and lack of connectivity has on communities. Supporting this is our knowledge around carbon emission mitigation and the ecological boundaries that determine our sustained wellbeing.

Sustainability Options understands the synergies between housing, transport, access, equity and biodiversity in the context of urban development as well as the role each has to well-being.

Our work covers the Bay of Plenty and we are based in Tauranga, recognised as one of the Major Urban Growth areas by the Ministry of Housing and Urban Development. We spend the majority of our time in low income communities, which is where we see one of the biggest impacts of poor or no urban planning. The image below represents our desired approach to urban development, which places the wellbeing of people at the centre. It also understands the wellbeing of people is reliant on a number of factors, each with a vital relationship to the other.

In Tauranga specifically we’ve seen the prioritisation of the market which has produced low quality, high cost housing, no or poor access to nature, no or poor access to choice of transport and in many case isolation from community. We’re experiencing sprawl which is further exacerbating all of the above and contributing to environmental degradation and increased social and cultural inequity.

We are encouraged by the conversations this consultation document is starting and wish to express our strong support for a NPS – Urban Development that enables the following outcomes, thereby redefining growth so that:

- People are at the centre of urban development,
- Housing provides functionality, performance and wellbeing,
- Indigenous biodiversity holds intrinsic value,
- Transport infrastructure enables choice and connectivity, and
- Communities are diverse, active and resilient
Questions and responses

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?

Yes we do support this, however in making room for growth, it can’t be at the expense of equitable social and environmental wellbeing.

Growth under the existing model delivers outcomes to a small percentage of people, those already with means. We have no support for this model to continue, therefore a drastic shift is required in the way development is allowed to occur. Equity must be a guiding principle of this NPS.

The way we value land also needs to change. Traditionally land is only seen as productive if used to build or grow, thereby creating a financial return. Land set aside specifically for indigenous biodiversity in the urban area brings many necessary benefits to both people and the environment and must be included in the NPS as a requirement by council to deliver.

2. Do you support the approach of targeting the most directive policies to our largest and fastest growing urban environments?

The fastest growing urban environments do need to be prioritised to deliver to the new development standards, but smaller, slower growing urban areas will just end up with the same issues as major, faster growing areas if the same approach is not required in some capacity. For example, homelessness, congestion and social issues associated to poor housing and poor community connectivity already exist in Rotorua, as I am sure they do in other medium growth areas.

New Zealand as a country should be moving together on this journey. This also allows for better collaboration between TLA’s especially in regions such as the Bay of Plenty, where a person might live in one city/town and work in another.

3. Do you support the proposed changes to future development strategies (FDSs) overall? If not, what would you suggest doing differently?

Yes, although the FDS must reflect the goals intended by the NPS-UD to ‘deliver high-quality, liveable urban environments that foster the wellbeing of people and the natural environment’. There needs to be stronger and clearer guidelines on what this means and looks like in practice. As a few examples, there is no reference in the draft objective and policies which refer to:
- emission standards for the built environment
- targets to achieve indigenous biodiversity goals
- wellbeing outcomes (i.e. improved mental and physical health)
- mechanisms to avoid developer led outcomes

4. Do you support the proposed approach of the NPS-UD providing national level direction about the features of a quality urban environment?

Yes, with the additions of:
- reducing emissions from the built environment
- introducing and/or increasing urban indigenous biodiversity
- ensuring communities are not shaped according to the residents’ socio-economic standing (or to the developers covenants)
- removal of developer covenants and instead introducing incentives for development that deliver to the above mentioned goals.
- a clearer definition of quality, specifically when it comes to housing performance and efficiency
- a clearer definition of efficiently (look to international examples)

5. Do you support the inclusion of proposals to clarify that amenity values are diverse and change over time? Why/why not?

Yes, with the explicit inclusion of environmental value concerning the use of land in an urban setting to introduce, protect, enhance or restore indigenous biodiversity and the eco-systems this supports, as well as to provide the well documented benefits of nature connection on wellbeing.

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?

Unsure. Tauranga is faced with enormous population growth, however what’s feasible (i.e. what’s available) and what’s likely to be taken up (Tauranga is a conservative town where people are wedded to the developers model of a 250sqm 4 bedrooms house with a lawn) are two different things.

7. Do you support proposals requiring objectives, policies, rules, and assessment criteria to enable the development anticipated by the zone description?

Yes.

Do you think that amenity values should be articulated in this zone description?

Yes, with the explicit inclusion of environmental value concerning the use of land in an urban setting to introduce, protect, enhance or restore indigenous biodiversity and the eco-systems this supports, as well as to provide the well documented benefits of nature connection on wellbeing.

8. Do you support policies to enable intensification in the locations where its benefits can best be achieved? Why/why not?

Given what we are facing (major social and environmental issues) a prescriptive approach may need to be taken, however what this looks like needs more careful consideration.

Location – 1.5 km of city centres for high density development makes sense with regards to maximising the existing infrastructure, however this is quite limiting for Tauranga given our geographical limitations. Although this is a better criteria than within an 800m walkable catchment of centres and frequent public transport stops as this would potentially allow more intensification in areas that can’t provide the same level of amenity as the city. For example commercial and industrial areas.

Size – functionality of space needs to be considered as well as just the number of dwellings (per hectare), which goes back to the intention of the NPS to ‘deliver high-quality, liveable urban environments that foster the wellbeing of people and the natural environment’. To achieve this communities need to be connected, people need to be able to access space that allow choice. For example, if 60 dwellings per hectare is achieved, what is the requirement for functional (laundry and
waste management) as well recreational space and nature connection? Is this shared? A minimum floor area is likely to be manipulated by the market that may end up in delivering dysfunctional space and possibly health consequences such as over-crowding.

If the NPS is to really shift the way we grow our cities then the wellbeing of people needs to be at the centre of all thinking. This then provides a different lens to view size, other than cost per sqm.

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?**

Not without stronger and clearer guidelines that:
- identify areas of environmental value with protection,
- prioritises public and active transport
- ensure community connectivity

10. **Do you support limiting the ability for local authorities in major urban centres to regulate the number of car parks required for development?**

Yes

**Which proposed option could best contribute to achieve quality urban environments?**

Option 3

**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?**

Funding for active and public transport infrastructure.

11. **Do you think that central government should consider more directive intervention in local authority plans?**

Unsure

12. **Do you support requirements for all urban environments to assess demand and supply of development capacity, and monitor a range of market indicators?**

- Mechanisms need to be in place to ensure housing quality, performance and efficiency.
- Housing affordability at purchase price is only an indicator of market behaviour not liveability.
- Long term affordability to run and maintain a home is just as important (if not more) than cost to buy.
- Incentivising quality and efficient builds is a way to encourage a shift, current building standards are poor and keep delivering poor housing outcomes, regardless of the buy price, this does not represent liveability, equity, nor social or environmental wellbeing.

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?**

Unsure. The intention is good, the reality may be something different.
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?

As a side comment related to this, one of the biggest frustrations I experience regularly is being asked (by council) to participate on community forums or working groups to contribute to council decision making on all related urban development issues. My time and knowledge (and that of others) is expected free of charge and the meetings are often long and involved. Consultants are then paid to produce pieces of work which do not represent the community input or voice. Further to this other closed workshops are held with developers which hold significant weight in in how outcomes are shaped.

I don’t know the solution to genuine community engagement that helps shape outcomes for our cities but simply requiring input from stakeholders may not be enough. Co-design and community-led design are over used phrases which mean well but are continuously override by commercial interests and personal preferences of decisions makers (i.e. those who do not believe in Climate Change). This goes back to my above comments that better guidelines for the following so that councils can deliver to the outcomes needed to change the way we develop.

- reducing emissions from the built environment
- introducing and/or increasing urban indigenous biodiversity
- ensuring communities are not shaped according to the residents’ socio-economic standing (or to the developers covenants)
- removal of developer covenants and instead introducing incentives for development that deliver to the above mentioned goals.
- a clearer definition of quality, specifically when it comes to housing performance and efficiency
- a clearer definition of efficiently (look to international examples)

There also needs to be accountabilities and mechanisms in place that help identify progress or fast failures. Flexibility and adaptability must be worked into plans to allow for changing technologies and global movements.

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

Unsure

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

Unsure

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.

Yes, there needs to be a clear alignment with the NPS for Indigenous Biodiversity, the NPS and National Environmental Standards for Freshwater, National Environmental Standards for Air Quality as well as the Climate Change Response Zero Carbon Amendment Bill.
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.

Unsure

Thank you for the opportunity to submit to the NPS – Urban Development

Sustainability Options