Urban Development NPS Submission – Eleanor West

Kia ora koutou,

I have summarised my feedback on the NPS below. I apologise for not organising this as per the questions that had been asked as I ran out of time to re-organise my feedback as responses to the relevant questions.

I would strongly support prioritising the redevelopment of brownfield sites within cities as opposed to expanding into greenfield sites where possible. New Zealand urban areas should be denser than they are now to improve affordability, reduce vehicle dependency, promote active transport and strengthen communities. If we develop greenfield sites now because it is easy, we are never able to get them back and will merely push the burden of smart development in brownfield areas on to the next generations. We need high quality investment now, not a band aid approach.

I would like this policy statement to give more consideration to the value of existing buildings and incentivise their re-development or dis-incentivise demolition. The high embodied energy of our built environment is often ignored. At the moment it often makes economic sense to demolish buildings and replace them, but this doesn't factor in the large amounts of physically wasted resources and embodied energy/carbon.

The consultation document suggests protecting open spaces as a priority, I would like to see this specified to public open spaces. It would be a pity if this policy statement gave weight to people who would see the protection of open spaces like golf courses, which are only able to be enjoyed by an affluent subset of our population, prioritised over the construction of housing etc. that would support good urban form.

I would also like to see increased greening in our open spaces to support ecology, create shade, increase opportunities for biophilia, and reduce urban heat island effects. This urban greening should be coordinated to create “nature corridors” through cities to connect habitat fragments with native planting. We should be creating capacity for bioremediation of brownfield sites through urban farming to produce local food with a lower footprint and higher nutritional value. This would improve the resilience of cities.

In terms of resilience in the face of climate change, we should be encouraging local bodies to invest more in the in-land developments and start paving the way to shift our city centres further from the coast in preparation for the inevitable sea level rise. We need high-density hubs outside the city to create local amenities and business and shift people to safer areas.

I would like to see local bodies encouraged to implement a highest and best use tax to incentivise smart development – taxing owners for the building type they are zoned for rather than what they have built. i.e. if they build standalone houses or one-story mega
stores in the urban centre they should be taxed as if they had built the multi-story building, they should have and could have built there.

Mixed use development is very important and should be encouraged. There should be direction to specify the inhabitant rate of an area at which local bodies must include key amenities like shops, supermarkets, parks, libraries, etc. in development requirements. Housing developments should be incentivised to mix high value and affordable housing to ensure that we are not segregating parts of the community. This policy statement intends to give guidelines on ‘good urban design’, this should include a consideration for the third place; places we occupy outside of our homes or places of work.

New Zealand is widely regarded as being severely lacking in the third places that make other international cities so attractive to live in. These should be free to enter and welcoming to everyone. Libraries are an excellent example of third places. The inclusion of these places needs to be considered in the guidelines and perhaps mandated, but cannot be too prescriptive as we must allow for a certain amount of place-making; people need to be allowed to make their mark on urban spaces and have some say over what they get used for and how they get used. Urban designers are not as attuned to the needs of the community as the community itself which needs blank slate places that they can use as they see fit. We need more community hubs that are designed for and by the community they’re there for, but also with consideration to how the community might change and the hub along with it.

I support the policy statement restricting the ability of local bodies to prioritise the preservation of character areas over the benefits of redeveloping them. Councils should have to justify why these places are important to protect, what benefits their protection will have for the city, and who they are protecting them for! Beauty and heritage are important, but not necessarily at the expense of the health of New Zealanders and our planet.

It is often the most affluent parts of society that have the most power to resist progress in their suburbs and they tend to use the heritage value as leverage to prevent densification. As local bodies exist to serve their constituents, they are often put in a position where they must be less ambitious in order to appease these NIMBYs. Having a national policy statement that they can refer to when countering these heritage arguments would give them strength to resist NIMBYism.

This policy statement should include national guidelines for accessory dwelling units (ADUs). If we are to densify our cities, we cannot rely solely on large developers as New Zealanders have a culture of private home ownership and many of the land parcels close to or within the inner city are owned by individuals or families. These standalone homes on large-ish sections present underutilized space. We can increase residences through the partitioning of large homes and building additional dwellings. One or two person households are on the rise and homes are becoming less and less affordable.
ADUs have huge potential but there isn't a consistent approach across local bodies in New Zealand at present which makes it difficult for the prefab housing industry to operate at the scale it needs to exploit this opportunity. This policy statement could give national direction on the development of ADU policy to densify our cities and provide more homes that suit the changing demographics. It needs to be easier to build multiple dwellings in a property without having to subdivide, e.g. for extended whanau that would prefer separate dwellings while still being able to pool their resources to afford the land. Making it easier for whanau to be near to each other has immense community value. Removing the ability for councils to set car parking restrictions for development will help with this.

The way we get around places is changing. We make a lot of short trips regularly within cities, many of which could be undertaken in the form of active transport, be that walking, cycling, ebikes, e-scooters, skating etc. These transport modes have the benefit of improving the health of the cities occupants and reducing emissions. However, at present, people often feel unsafe at different times of day or in different areas because the streets are not well lit, there aren't enough safe bike lanes etc.

This policy statement should direct the enabling of these modes to be a priority for urban areas. We need more of the obvious things like bike lanes, but also more innovative and locality specific solutions to drive uptake. For instance, in Wellington the terrain makes cycling difficult for people without high levels of fitness – one proposal that has been suggested it building bike/chair lifts up key hills that people can use to reduce the effort needed to get in and out of the city.

Removing the ability for councils to set car parking restrictions for development will help with encouraging active transport as it will make it harder for people to rely on their vehicles. However, at present we are a car-dependent society and we cannot make it harder for people to use their cars without offering alternatives at the same time. The offering and encouraging of car sharing services, like Mevo in Wellington, should be introduced in tandem with reducing car parking.

I'm apprehensive of the suggestion to offer discounted car parking to electric vehicles as a method of reducing emissions as this is not an equitable strategy. The people least able to afford an environmentally friendly vehicle option would essentially be punished for being poor. I would support the encouragement of car free CBDs which would also make them safer for pedestrians and improve foot traffic for shops etc. An intermediate policy could be setting aside carparks in the inner city for car pooling where you can only park there if you have multiple people in the car – new technology can be implemented to detect the number of passengers quite easily.
Reducing car dependency has the benefit of encouraging safer urban areas. There would be fewer accidents and collisions involving vehicles, and there would be more people on the streets outside of their cars interacting with each other and ‘policing’ the community. It has the co-benefit of improving mental health as it reduces social isolation when people spend less time in cars.

We need to be implementing better, more cohesive transport strategies in our major cities that prioritise sustainable, low cost public transport that serves everyone well (not just the people in wealthy suburbs). We need greater density along transport routes to make more efficient and regular public transport financially viable. We should be focusing on transport powered by renewable energy which will have the co-benefit of improving air quality.

There needs to be capacity for better consultation with community and better representation in the planning process. Right now, the way that consultation is conducted advantages and prioritises the opinions of landowners and the more affluent members of society. We should be trail ing more initiatives rather than consulting and then abandoning the ideas when there is not enough support – often people have poorly informed opinions about new initiatives because they have never been exposed to them. For instance, New Zealanders are very scared of medium and high-density housing because it has been done very poorly here in the past and they have had bad experiences. Anyone who has lived in European cities can speak to the vast difference in how they do density and how enjoyable it is to live in these places.

There needs to be more consultation with minority groups and considerations to their needs when designing our urban areas. For instance, woman are shown to have very different movement patterns and tend to rely more on footpaths etc. than men do. Elderly people struggle to get around our cities when the lights change to quickly and the operators of public transport are openly disparaging of their slow pace.

There should be an inclusion of reference to Maori design principles, like Te Aranga Design Principles in Tāmaki. There needs to be genuine co-design of our urban spaces, not limited to mere consultation of local iwi and hapu. Infrastructure needs to reflect local indigenous history and papatuanuku and must strive to decolonise our places. This should start with improved diversity and understanding within local bodies themselves. Iwi and hapu invited to consult need to be appropriately paid for their time as they should not be used as a source of free labour. Their expertise and knowledge are valuable and should be treated as such. A good place to start acknowledging our colonial history and changing the narrative would be place names! I would like to see more signage and official naming reverted to te reo Maori.

“Cities have the capability of providing something for everybody, only because, and only when, they are created by everybody.” – Jane Jacobs. There is representation and leadership, and right now in the face of a global crisis, our government needs to be showing leadership.
Hei konā mai,
Nā Eleanor