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

Submission Reference no: 5

The details of this submitter has been withheld from publication.
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
Current land use rules are weighted too heavily towards existing residents of a neighbourhood. There needs to be better balance between providing for those already in a neighbourhood, but also providing for future residents and considering the effects on the national economy as a whole. If all our country's wealth is tied up in illiquid housing because there is insufficient land to meet demand and keep prices at a sensible level, everyone loses, including those already in a neighbourhood. As the effects are indirect, they are hard for individuals to observe, so government needs to intervene and ensure all these needs are balanced fairly.

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
When constructing greenfields neighbourhoods for government housing, such as Housing NZ, the government can take the lead in designing pedestrian and bike-friendly environments. As these are likely to have narrower roads, less space will be taken up by the carriageway, freeing up more room for housing. Private developers may follow suit after seeing the success of this.

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
There are short-term benefits to targeting cities/areas where there is a dire need. However, in the long term, smaller cities and towns will benefit more from changes to the rules as it only takes a few developments to have a large impact on these places. Thought needs to be given to the fact that within 30-60 years, our large coastal cities will be facing severe effects of climate change and significant amounts of current coastal homes will no longer be tenable, leading to a new kind of climate refugee. They may not be large in number, but won't be insignificant either. Where will they live? Inland towns and cities are well placed to receive these people and need to be ready for the urban development required.

Clause
Do you support the approach used to determine which local authorities are categorised as major urban centres? Why/why not?
Notes
Yes. The line has to be drawn somewhere.

Clause
Can you suggest any alternative approaches for targeting the policies in the NPS-UD?
Notes
A two-pronged approach would be great. Going for places where there is already great need is a given, but how about working on a prevention for places not yet in the grip of a housing crises but perhaps creeping closer to the brink?
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<tr>
<th>Clause</th>
<th>Question 3. Do you support the proposed changes to FDSs overall? If not, what would you suggest doing differently?</th>
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<tbody>
<tr>
<td>Position</td>
<td>Yes</td>
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<tr>
<td>Notes</td>
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<tr>
<th>Clause</th>
<th>Do you support the approach of only requiring major urban centres to undertake an FDS? Would there be benefits of requiring other local authorities to undertake a strategic planning process?</th>
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<tbody>
<tr>
<td>Notes</td>
<td>There will always be benefits to including all local authorities, particularly in the long term and being prepared for what the future may bring. However this could be staged.</td>
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<thead>
<tr>
<th>Clause</th>
<th>What impact will the proposed timing of the FDS have on statutory and other planning processes? In what ways could the timing be improved?</th>
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<tbody>
<tr>
<td>Notes</td>
<td>There will never be perfect timing. At some point, progress just has to happen.</td>
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<tr>
<th>Clause</th>
<th>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?</th>
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<tbody>
<tr>
<td>Position</td>
<td>Yes</td>
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<td>Notes</td>
<td>It's a compromise, but moving in the direction of a more ideal urban environment will make it easier, in time, to get truly great outcomes.</td>
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<thead>
<tr>
<th>Clause</th>
<th>Do you support the features of a quality urban environment stated in draft objective O2? Why/why not? (see discussion document, page 26)</th>
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<tr>
<td>Notes</td>
<td>Yes</td>
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<tr>
<th>Clause</th>
<th>What impacts do you think the draft objectives O2-O3 and policies P2A-P2B will have on decision-making (see discussion document, page 26)?</th>
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<tbody>
<tr>
<td>Notes</td>
<td>There's still a lot of room for the proportion of council officials who are stuck in the past to weasel and pay lip service to these objectives. They can say they considered them and then make the decisions they have always made. There need to be stronger, more specific directives that require certain action to be taken.</td>
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<tr>
<th>Clause</th>
<th>Question 5. Do you support the inclusion of proposals to clarify that amenity values are diverse and change over time? Why/why not?</th>
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<tbody>
<tr>
<td>Position</td>
<td>Yes</td>
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<td>Notes</td>
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<tr>
<th>Clause</th>
<th>Do you think these proposals will help to address the use of amenity to protect the status quo?</th>
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<tr>
<td>Notes</td>
<td>Again, officials can pay lip service and do what they've always done. Stronger directives would be preferable.</td>
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<tr>
<th>Clause</th>
<th>Can you identify any negative consequences that might result from the proposed objective and policies on amenity?</th>
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<tbody>
<tr>
<td>Notes</td>
<td>Nothing that would make things worse than they are. But they might not result in massive change, which is still a negative consequence.</td>
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Can you suggest alternative ways to address urban amenity through a national policy statement?

Notes
Use of examples and overseas communities to emulate would be good.

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
Somewhat

Notes
Capacity that is likely to be taken up is important for getting housing built at speed. But developers’ opinions about what opportunities they want to take up may not be the opportunities that are best for NZ in the long run. Developers are already lobbying for the opportunities they think are good ones. We need other opportunities created that are good for our communities, not just the people profiting from development.

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

Clause
Do you think requiring zone descriptions in district plans will be useful in planning documents for articulating what outcomes communities can expect for their urban environment? Why/why not?

Notes
Yes.

Clause
Do you think that amenity values should be articulated in this zone description? Why/why not?

Notes
Yes. Amenity is an important part of every neighbourhood and directives need to be set.

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
Intensification is happening everywhere, but not quickly enough. The trend in greenfields developments towards larger houses on smaller lots is essentially resulting in apartment-like amenity anyway. Each house takes up most of the lot, with a deck and very little grass. You could stack a bunch of these houses on top of each other, call it an apartment building and lose very little amenity because these houses have so little outdoor space in the first place. So kiwis are more ok with intensification than perhaps they like to think they are.

Clause
What impact will these policies have on achieving higher densities in urban environments?

Notes
They should lead to more dense developments, however a focus on how to achieve this in more provincial centres would be good. There is a (wrong) perception that densification only works in metropolitan cities. However, NZ’s smaller cities can and do have low-rise apartments. More of this needs to be encouraged explicitly.

Clause
What option/s do you prefer for prescribing locations for intensification in major urban centres? Why?

Position
Option 2 (the prescriptive approach)

Notes
This is a strong directive that demands positive action from councils. It will benefit all cities, not just the majors.

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
Dwellings per hectare is fine, preferably with a caveat that there be no minimum parking requirements, if anything maximum parking requirements should be the order of the day.

Clause
What impact will directly inserting the policy to support intensification in particular locations through consenting decisions have?
Notes
The impact should be that development cannot happen in these areas unless it increases the density to the required level. The wording should be looked at to make sure this is the outcome.

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Notes
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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
Any viable greenfield areas will have already been identified by developers and councils, I don't see the point in going looking for more. The goals should be to see more housing provided in brownfields over time, as is happening in Auckland.

Clause
How could the example policy better enable quality urban development in greenfield areas (see discussion document, page 37)?
Notes
Require developments to be designed for pedestrians, bikes and public transport first, and motorists second.

Clause
Are the criteria sufficiently robust to manage environmental effects to ensure a quality urban environment, while providing for this type of development? (see example policy in discussion document, page 37)
Notes
Any development that reduces our urban footprint per capita is positive environmentally to some degree, unless it's built right on a wetland. Aim to have the greatest positive effect though.

Clause
To what extent should developers be required to meet the costs of development, including the costs of infrastructure and wider impacts on network infrastructure, and environmental and social costs (recognising that these are likely to be passed on to future homeowners/beneficiaries of the development)? What impacts will this have on the uptake of development opportunities?
Notes
Developers should have access to government and council subsidies for infrastructure that increase in size depending on the environmental and social criteria the development meets. Developments that have the greenest homes and best provision for active and public transport should have the greatest access to public funds for infrastructure.

Clause
What improvements could be made to this policy to make development more responsive to demand in suitable locations beyond areas already identified for urban development?
Notes
None.

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
Somewhat
Notes
I support it as long as the impact is less parking, not more.

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
Clause
What would be the impact of removing car park minimums in just high- and medium-density, commercial, residential and mixed use areas, compared with all areas of a major urban centre?

Notes
It's not just dense areas that are affected. So many bog standard standalone dwellings have to be built with a certain amount of parking on site because councils require it. Success here would be if all homes can be built or land can be subdivided without minimum parking requirements. There's probably a case to say low-density suburbs need 1x on site parking space. Current requirements in some parts of the country for 2x spaces plus turning space is overkill. Most drivers can reverse onto the street successfully.

Clause
How would the 18 month implementation timeframe impact on your planning processes?

Notes
n/a

Clause
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?

Notes
none

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

Position
Yes

Notes
Local authorities are large ships to turn around and have some staff who are longstanding and resistant to change. Without impetus from central government, some things either just won't happen or will take far too long, perhaps waiting for a change of guard, which can take years or decades.

Clause
Which rules (or types of rules) are unnecessarily constraining urban development?

Notes
minimum parking requirements, rules about lot coverage for dwellings, rules about density, rules that zone too specifically (more mixed commercial/residential zones in appropriate areas would be great).

Clause
Can you identify provisions that are enabling higher density urban development in local authority plans that could be provided for either nationally or in particular zones or areas?

Notes
No

Clause
Should a minimum level of development for an individual site be provided across urban areas (for example, making up to three storeys of development a permitted activity across all residential zones)?

Notes
Yes.

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
Yes, but specific requirements for how to act on this monitoring need to be set.

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
More collaboration leads to less resistance to change, not specifically in regard to iwi, but in regard to anyone who feels excluded from a decision.

**Clause**
Do you think the proposals are an appropriate way to ensure urban development occurs in a way that takes into account iwi and hapū concerns?

**Notes**
yes

**Clause**
How do you think local authorities should be directed to engage with Māori who do not hold mana whenua over the urban environment they are currently living in?

**Notes**
Local authorities should take into account the significance of the decision being made. If the area being considered has national significance, feedback from Māori who do not hold mana whenua would be appropriate. If an area only has local significance, only the opinion of mana whenua matters.

**Clause**
What impacts do you think the proposed NPS will have on iwi, hapū and Māori?

**Notes**
More consultation and inclusion

**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**
The best timing would be yesterday (or five years ago), but this will work.

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

**Notes**
Constant monitoring of local authorities to ensure compliance.

**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.

**Position**
No

**Notes**

**Clause**
Question 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?

**Position**
No

**Notes**

**Clause**
Question A1. Do you support the changes to the HBA policies overall? Are there specific proposals you do or do not support? What changes would you suggest?

**Position**
Yes

**Notes**
Clause
Question A2. What do you anticipate the impact of the proposed polices (and any related changes) would be on planning and urban outcomes?

Notes
More development coming online quicker. This may further constrain the supply of construction capability.

Clause
Question A3. Are the margins proposed in policies AP3 and AP12 appropriate, if not, what should you base alternative margins on? (for example, using different margins based on higher or lower rural-urban price differentials)

Position
Yes

Notes

Clause
Question A4. How could these policies place a greater emphasis on ensuring enough development capacity at affordable prices?

Notes
Cheaper consenting for smaller, more affordable properties, less red tape leading to quicker construction.

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

Position
No

Notes
Provincial cities need to be in on this too. Many of them are growing and need to do so without encroaching on too much productive land. They also need to be standing by to grow if our coastal cities face severe disruption from climate change.

Clause
Unless you select one of the options below, the Ministry will consider that you have agreed to have your submission and your name posted on its website.

Position
Please do not include my name in the published summary of submissions.

Notes