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

**Submission Reference no:** 57

**Submitter Type:** Planning/urban design professional  
**Source:** Web Form  
**Overall Position:** Support in part

## 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**
MfE the boxes you have created in this submission form are not deep and large enough to see what you are writing. This will create more attachments and individual submissions.

## 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**
The NPS on Urban Development needs to be developed in conjunction with a number of National Environmental Standards on urban environments, quality urban design, medium density housing, high density housing, sustainable development and other related urban development topics. Without these each council will be undertaking their own guidance in these areas with no clear direction on where to head. The NPS on Urban Development must also be in conjunction with other government policies such as the Government Policy Strategy on Transport.

## 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**
No

**Notes**
The high and medium growth urban areas are the most changeable and should there needs to be more emphasis on these centres as to how they grow or decline. For example Whangarei is having high growth and has high deprivation. This is without the North Port goes ahead with a rail link this centre will expand substantially. The NPS in Urban Development is not facing the fact that it is the high to medium centres that face the greatest difficulty with growth and decline. You are also placing a lot of reliance on the Future Development Strategies (FDS) as though they are the answer to all urban growth problems. However this NPS misses the whole issue of having a community on the side of growth and the money required to undertake the growth.

## Clause

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

**Notes**
The categories are fine you just need to be asking the high and medium growth urban areas to be considering Future Development Strategies (FDS) as well as the major growth areas.

## Clause

Can you suggest any alternative approaches for targeting the policies in the NPS-UD?
Notes
The alternative is to direct the urban areas - major, high and medium to undertake Future Development Strategies. Without this happening New Zealand will be unable to plan strategically through out the country. For example Whangarei has high growth with high deprivation. This urban area needs strategic direction now even if North Port does not occur.

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

Position
Somewhat

Notes
Yes having FDS's is good. However the most changeable urban areas in the high to medium centres has not been in a way that will create a model where New Zealand will know if it has "sufficient development capacity in the medium and long term across an agreed area, and how they can meet the minimum development capacity housing targets." I am confused at how an FDS "will help identify funding gaps without holding up development"? I have to observe in the West Auckland case Auckland Council has a very good idea what was holding up development in respect to the three waters infrastructure e.g. main sewage connections. Money and also planning e.g. it takes time, often up to 10 years, to do infrastructure projects. However no one in Auckland Council or central government in 2016-1017 was planning in a strategic way how Western Auckland rapid public transport was going to work to connect west Auckland, Kumeu, Whenuapai, Hobsonville with the North Shore and central Auckland areas. This rapid public transport is needed now. Therefore if you don't identify the problem it definitely won't be in the FDS. This brings up the question of who is going to audit the FDS's and if you need a National Environmental Standard to provide guidance on how the FDS's are meant to be developed and what needs to be in them. A very important factor that needs further work and even an NES is community consultation when preparing the FDS.

Clause
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?

Notes
Yes there would definitely be benefits in all other local and regional authorities undertaking strategic planning processes.

Clause
What impact will the proposed timing of the FDS have on statutory and other planning processes? In what ways could the timing be improved?

Notes
Timing is always going to be an issue however I think you need to align it as best as possible as something is always going to come up to change the timetable e.g. and earthquake, fire or major infrastructure disaster. This timetable is also only looking at the local government timetable where central government funding and the central government party's in power will be major influence on development processes through funding and implementation of central government programmes e.g. housing being built by Housing New Zealand (Kāinga Ora – Homes and Communities).

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
No

Notes
This needs to be done by a specific NPS on quality urban environments with a set of National Environmental Standards. The list of ways that are being proposed in the NPSUD will not be enough and result in ongoing litigation on what things mean and how to do it. The proposed preamble does not list sustainability of the built form or urban form. This should be a major factor in any new or redeveloped urban area.

Clause
Do you support the features of a quality urban environment stated in draft objective O2? Why/why not? (see discussion document, page 26)

Notes
No I do not support the features specified as being what a quality urban environment is about. The NPSUD as proposed does specify the features of a quality urban environment! Your preamble says one thing while the proposed NPSUD has a set of objectives and policies that are vague (similar to an Act legislation not an NPS) and will be full of different interpretation. I suggest you consider incorporating the qualities of urban design as specified in the New Zealand Urban Design Protocol 2005. But even more importantly you need a specific NPS on quality urban environments with a set of National Environmental Standards. This is far too important to be left to the vague objectives and policies that are stated here.

Clause
What impacts do you think the draft objectives O2-O3 and policies P2A-P2B will have on decision-making (see discussion document, page 26)?

Notes
Total confusion will be the result of these draft objectives and policies as they are too vague and bound to lead to misinterpretation. They will result in endless litigation. You need a specific NPS on quality urban environments with a set of National Environmental Standards. A starting point would be the New Zealand Urban Design Protocol 2005.

**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**

No.

**Notes**

This section is just too brief and vague and needs to be combined into a specific NPS on quality urban environments with a set of National Environmental Standards. At the very least talk about positive amenity values. O4 is written diverse and changing amenity values could be all negative to individuals and communities and it would satisfy the NPS. Suggested word addition: O4: Urban environments provide for the diverse and changing ‘positive’ amenity values of individuals and communities. Suggested word addition: P3A: In making planning and consent decisions, decision-makers must recognise that ‘positive’ amenity values:

**Clause**

Do you think these proposals will help to address the use of amenity to protect the status quo?

**Notes**

No. I think you need to do a lot more work on amenity values to understand what they are and what they mean to the community. Once again I suggest you consider looking at the New Zealand Urban Design Protocol as a start and then consider adding this to a NPS on quality urban environments with a set of National Environmental Standards.

**Clause**

Can you identify any negative consequences that might result from the proposed objective and policies on amenity?

**Notes**

At present you can look at amenity values in urban areas in the RMA. I consider that not enough detail has been given to this section with experienced professionals e.g. landscape architects, architects, ecologist, urban designers etc being involved in this section. I suggest you consider looking at the New Zealand Urban Design Protocol as a start and then consider adding this to a NPS on quality urban environments with a set of National Environmental Standards.

**Clause**

Can you suggest alternative ways to address urban amenity through a national policy statement?

**Notes**

I suggest removing this section until you have adequately considered what needs to be written in this section. I suggest you consider looking at the New Zealand Urban Design Protocol as a start and then consider adding this to a NPS on quality urban environments with a set of National Environmental Standards.

**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**

Yes.

**Notes**

This is a good move as land banking is a major issue and while it is feasible that development will occur often developers wait till the market is right or they have adequate finances to undertake the development. As seen in the Special Housing Areas of Auckland there were major uplift of density but little development as the developers were either land banking or on selling at a profit the Special Housing Areas.

**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**

This is an excellent addition to the NPSUD. I totally support this addition. A ‘zone description’ needs to include a written and a graphic description to enable all the community to envision what the zone being proposed will look like. The description needs to include:* photos of proposed zone buildings, lots and blocks * sketches of the proposed zone buildings, lots and blocks * the mix of uses and densities envisioned in this zone * A three dimensional representation of what this could look like.

**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 if the zone description includes graphic details of what it will look like so that all the community can envision what the zone is proposed to look like. A 'zone description' needs to include a written and a graphic description to enable all the community to envision what the zone being proposed will look like. The description needs to include: * photos of proposed zone buildings, lots and blocks * sketches of the proposed zone buildings, lots and blocks * the mix of uses and densities envisioned in this zone * A three dimensional representation of what this could look like.

Clause
Do you think that amenity values should be articulated in this zone description? Why/why not?
Notes
Yes amenity values definitely need to be articulated in the zone description and be provided in a way that people can envision what the zone will look like. This needs to be done in writing and also providing a graphic description of what the zone will look like with A 'zone description' needs to include a written and a graphic description to enable all the community to envision what the zone being proposed will look like. The description needs to include: * photos of proposed zone buildings, lots and blocks * sketches of the proposed zone buildings, lots and blocks * the mix of uses and densities envisioned in this zone * A three dimensional representation of what this could look like.

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
In existing urban areas policies and zoning that are being proposed won't intensify the areas you are proposing. You actually need to stimulate the intensification with monetary drivers. For example why aren't the main roads in Auckland occupied by mixed use apartments rather than low density shops or car sales yards? The zoning is there for the intensification but the owners of the land need some carrots or sticks to consider the change in the land use. Councils or Central Government need to be working in partnership with land owners and the community to make change. Intensification does not happen with just changing the zoning.

Clause
What option/s do you prefer for prescribing locations for intensification in major urban centres? Why?
Position
Option 1 (the descriptive approach)
Notes
The descriptive approach is better as it allows local councils and their communities to define the intensification. In addition the prescriptive approach does not take into account topography and the existing urban form. For example the prescriptive walkable catchment and radius from a city centre may actually be very small due to topography or single major roads. Having a descriptive approach may actually capture more land for intensification as the local population walks from a greater catchment area. I would also suggest that you change Higher-density residential activities are those with a concentrated bulk of buildings such as 'medium density e.g.' terraced housing and 'high density e.g.' apartments.

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
You need to provide descriptions of: *Medium Density *High Density. Also I think there needs to be a bedrooms and dwelling per hectare calculation. Minimum floor area could mean massive dwellings with minimal number of bedrooms. Its not a good measure.

Clause
What impact will directly inserting the policy to support intensification in particular locations through consenting decisions have?
Notes
I do not support the insertion of the policy P6D into the district plans in this way. Its to blunt and will create some perverse developments. If this policy is proposed it needs to consider more than just intensification and choice. What has happened about positive amenity values and quality urban environments? You need to include positive amenity values and quality urban environments for this policy to be considered. If you do get change and you haven't added the need for positive amenity values and quality urban environments you will probably get very negative intensification that no one will want in the future.
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**

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**Clause**
How could the example policy better enable quality urban development in greenfield areas (see discussion document, page 37)?

**Notes**
The majority of New Zealand cities already have enough land for greenfield development the trouble is its is land banked by the developers and land owners. I can't see how this idea of 'enabling' greenfield areas in this way could be sustainable and positive for the urban environments.

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**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**
The criteria are not sufficiently robust enough to manage environmental effects. The are based on development rather than a quality urban environment.

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**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**
The developers should be required to meet all the cost of development including the cost of the infrastructure and the wider impacts on infrastructure networks. Of course the environmental and social costs will be passed on to the future urban environment inhabitants. The whole idea of this type of development would be that it would go ahead if it was really necessary. However as already stated the majority of New Zealand cities have large areas of land banked greenfield zoned land. The issue is the developer and the land owners waiting till the price or finances are right prior to developing a green field subdivision. Also note the further you go out in greenfield subdivision the greater the cost of transport to get to work, to connect with social infrastructure and just live. If the price of petrol goes up each kilometre extra in a journey will make these outer city edge greenfield land more unaffordable.

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**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**
Delete this policy as it is just not workable.

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**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**

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

**Position**
Option 3: removing the ability for local authorities to set minimum car park requirements in areas providing for more intensive development.

**Notes**
Option 3 would be more palatable for local councils. However I would also suggest in all other areas there is a 'maximum car park' requirement. This would target business and residential development to reduce the amount of car usage. Also you need a requirement for other services which include: *Bike parking facilities or storage. In a townhouse this may include a shed or small outside room that can store the bike. In an apartment this includes a lockable garage. In a supermarket or retail complex this includes a security lockable bike garage, toilets, showers and lockers for the cyclists. *Quality public transport terminals that are suitable for everyone to wait for the public transport.

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**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**
In Wellington it would mean absolutely nothing as this rule already applies in the city centre and suburban centres. You would have to consider vehicle service areas for medium density residential.

**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**
This needs a lot of education of what is happening and why its happening for the people who already live in these areas. Residential parking tickets may be required for people in these areas.

**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**
This needs a lot of education of what is happening and why its happening for the people who already live in these areas. Residential parking tickets may be required for people in these areas.

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

**Position**
Somewhat

**Notes**
It's a really pity that the BECA report did not look at how Wellington City Council (WCC) uses its statutory residential design guide to allow for intensification on sites. In WCC there are no minimum lot sizes or maximum number of dwellings. However the height to boundary rules are maintained to keep the positive amenity values of neighbouring properties. I would really suggest talking to the urban design team at Wellington City Council about the way their statutory design guide and District Plan work. And please don't see the design guide as a restriction as its not actually an enabler of quality urban design.

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

**Notes**
I believe minimum lot sizes and maximum number of dwellings are the real issues of this type of development.

**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**
Wellington City Council (WCC) uses its statutory residential design guide to allow for intensification on sites. In WCC there are no minimum lot sizes or maximum number of dwellings. However the height to boundary rules are maintained to keep the positive amenity values of neighbouring properties.

**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**
No. You need to do more research and show how this would actually work.

**Clause**
Given the potential interactions with the range of rules that may exist within any given zone, how could the intent of more directive approaches be achieved?

**Notes**
If 'achieved' is getting more intensive development I consider as already stated: In existing urban areas policies and zoning that are being proposed won't intensify the areas you are proposing. You actually need to stimulate the intensification with monetary drivers. For example why aren't the main roads in Auckland occupied by mixed use apartments rather than low density shops or car sales yards? The zoning is there for the intensification but the owners of the land need some carrots or sticks to consider the change in the land use. Councils or Central Government need to be working in partnership with land owners and the community to make change. Intensification does not happen with just changing the zoning.

**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**
Somewhat

**Notes**
What are the 'range of market indicators'? Are they the same through out the country? If the market if volatile and the 'range of market indicators' gives no constructive picture what is the point of undertaking this evaluation?
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**
Somewhat

**Notes**
I suggest an NPS on Maori Engagement with a good set of National Environmental Standards on how to undertake the engagement would be also very positive.

**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**
Maori who don’t have mana whenua over the urban environment are part of the greater community that needs to be engaged and consulted with. I agree its important that local authorities provide opportunities for Māori to be involved in decisions that shape their urban environment. But at the same time its important that local authorities have good robust consultation and engagement with their community.

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

**Notes**
The guidance needs to be for the community, iwi and Hapu, developers and the local community. The Ministry for the Environment needs to structure a extensive communication, support and face to face dialogue.

**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**
Somewhat

**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**
Yes

**Notes**
Specific provisions and guidance are require on: *Amenity values *Quality urban environments

**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**
Somewhat

**Notes**
I would suggest that the HBA becomes an National Environmental Standard or a National Planning Standard.

**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**
In some areas there won't be any change because it takes a long time to get change in urban areas. Nothing happens overnight. However the biggest issue is you haven't set up a monitoring regime for this. How if you free up everything to a permitted activity are you going to monitor the development? You will have to do it through building consents rather than the RMA. However you don't appear to have set up the monitoring regime in a way that this has been accounted for.
### 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**
Unsure

**Notes**

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**Clause**

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

**Position**
No

**Notes**