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

Submission Reference no: 6

The details of this submitter has been withheld from publication.
Submitter Type: Other
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

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
Yes
Notes
In the context of urbanisation and immigration, combined with multiple concurrent housing crises, this approach makes sense.

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

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

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
Perhaps there could be a phased approach, so that smaller centres could learn from the outputs of major centres.

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
Yes
Notes
There is unacceptable levels of variation and skill in local authorities - national direction and resources are required.

Clause
Do you support the features of a quality urban environment stated in draft objective O2? Why/why not? (see discussion document, page 26)
Largely, but there is no mention of incorporating greenhouse gas emissions reduction features.

**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**
Yes
**Notes**
Equity is particularly important - more investment should go to areas with currently low amenity, which tends to overlap with people living in poverty. Culturally-sensitive amenity enhancement is key.

**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**
Unsure
**Notes**

**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**
**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**

What option/s do you prefer for prescribing locations for intensification in major urban centres? Why?
**Notes**
Health impact assessment should form a major part of this approach - quantifying the health benefits of intensification.

**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**
Densification should be the major goal of urban development in New Zealand. Greenfield development almost always has an outsized contribution to traffic congestion, increased maintenance costs, and leads to much poorer quality of life outcomes. People living in greenfield developments are much less likely to be able to access their occupational sites via public and active transport.

**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**
Entirely - there is currently a large inequity of urban dwellers subsidising wealthier people who can afford to purchase new homes in greenfields.

**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**
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<td>Minimum parking requirements lead to significantly poorer urban environments and land efficiency. They should not be allowed for any local authorities.</td>
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<tr>
<td>Which proposed option could best contribute to achieving quality urban environments?</td>
<td>Option 1: removing the ability for local authorities to regulate the requisite number of car parks</td>
<td>Maximum parking limits should also be investigated.</td>
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<td>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?</td>
<td>Densification needs to occur everywhere - MPRs inhibit this. They are never appropriate and distort the economics of urban development.</td>
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<td>Question 11. Do you think that central government should consider more directive intervention in local authority plans?</td>
<td>Somewhat</td>
<td>After a quality assessment - some authorities (e.g. Auckland) will be able to produce quality plans, while others will struggle. National interests need to be considered in many cases in local plans.</td>
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<td>Which rules (or types of rules) are unnecessarily constraining urban development?</td>
<td>MPRs</td>
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<td>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)?</td>
<td>Yes - terraced and 2-storey housing should be permitted anywhere.</td>
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<td>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?</td>
<td>Yes</td>
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<td>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?</td>
<td>Yes</td>
<td>Maori values and culturally-sensitive development are the way of the future and tend towards density, sustainability and socially inclusive housing. We could all benefit from following the examples of iwi and hapū-led development.</td>
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<td>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?</td>
<td>Yes</td>
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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

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