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

Submission Reference no: 71

The details of this submitter has been withheld from publication.

Submitter Type: Individual
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
I support it provided that it balances needs effectively, including protecting arable soils and urban biodiversity areas

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
Rezoning 'trade offs' whereby all greenfield development must provide a sizeable portion of land for the purposes of parkland / open space, preferably with a focus on biodiversity and habitat restoration. Preference towards densification of existing residential space over greenfield development.

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

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

Clause
Can you suggest any alternative approaches for targeting the policies in the NPS-UD?
Notes
No

Clause
Question 3. Do you support the proposed changes to FDSs overall? If not, what would you suggest doing differently?
Position
Somewhat
Notes
In general I support the proposed changes. However protection of green space, native bush and ecological habitats is critical. Not only for the sake of biodiversity but also climate moderation in our urban centres. For example blocks of bush can help hold moisture, buffer temperatures and reduce wind speeds in built up environments, as well as providing habitat for urban biodiversity. Wildlife corridors should also be top priority - rather than just isolated patches of native bush. This holds great amenity and aesthetic value as well.
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

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
-

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

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
Yes. However an additional aspect which directly acknowledges the value and benefits of urban biodiversity would be beneficial.

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
It seems to be favouring the 'economic' and to a lesser degree 'social' aspects of a triple bottom line approach. Ambiguity of wording could result in a free-for-all for developers without adequate consideration of environmental impacts of proposed developments.

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
Somewhat
Notes
I agree that amenity values change over time. But that should not allow for the removal of green / open spaces and retention or planting of ecological areas. Once green space is gone it is very hard to get back. It is important to acknowledge that although amenity values change over time in a specific sense, the need and desire for green space is a perennial desire of humans and will only become more valuable over time.

Clause
Do you think these proposals will help to address the use of amenity to protect the status quo?
Notes
I don't know

Clause
Can you identify any negative consequences that might result from the proposed objective and policies on amenity?
Notes
I feel like developers may use the idea of 'changing amenity values' to justify a reduction or removal of green and open spaces. Which should not be allowed. Once its gone its gone.

Clause
Can you suggest alternative ways to address urban amenity through a national policy statement?
Notes
Stronger inclusion of an ethos of preservation of urban biodiversity and green space
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**
No

**Notes**
This is a huge topic. Looking forward in time in a realistic fashion in regards to climate science etc. It appears likely that there will be SIGNIFICANT demand for development in countries like New Zealand which may still be relatively 'inhabitable' when areas within the tropics etc. are becoming uninhabitable. This policy document should not simply allow for rampant bulk wholesale development dictated purely by demand alone. New Zealand needs to think about what level of development and population density we actually want. At a fundamental level, if development is to occur according to demand alone, then densification of existing residential space should be held as a priority, and any greenfield development needs to be balanced with adequate protection of arable soils, native bush, as well as the restoration / creation of additional habitats (and amenity areas) by developers as part of their consent requirements. For example wetland areas, stream restorations, tree plantings etc.

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**
No

**Notes**
Again... what is preventing this from becoming a complete urban sprawl free-for-all? If such measures are to be implemented then it is CRITICAL that environmental bottom lines are not compromised in the process.

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

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

**Notes**
Yes

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**
Yes absolutely. It makes a lot of sense to capitalise and gain maximum benefit from existing infrastructure rather than put strain on infrastructure via urban sprawl.

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

**Notes**
Hopefully they will lead to more compact cities with greater population densities in the inner areas of cities allowing for a more efficient and effective and vibrant functioning of New Zealand's cities

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**
Don't know

What impact will directly inserting the policy to support intensification in particular locations through consenting decisions have?

**Notes**
Hopefully it will lead to developers preferring to build medium to high density housing in already built up areas rather than land-banking greenfield sites and taking them out of food production.
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**
Greenfield development should be carried out as a last resort - once inner cities are sufficiently densified. Greenfield sites need to be carefully protected and any potential development very well thought out prior to approval taking into consideration the needs and challenges of future generations.

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

**Notes**
It shouldn't better enable greenfield development. Make it stricter.

**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**
I don't think so. There needs to be more emphasis on urban biodiversity, wildlife corridors and habitat restoration.

**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**
All of them. It means that developers might reconsider greenfield development in favour of urban densification which should be the first priority in this scenario. If people want to develop greenfield then they should be able to cover the costs of establishing new infrastructure as well as providing a portion of the land to reserve space.

**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**
A smarter approach to greenfield development which prioritises areas which do not a) have biodiversity value or native bush b) will not detract from local food production or amenity values of the area and c) are strategically placed to make use of existing transport and other services.

**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**
Parking will still be important in the future. I trust councils to be able to judge and evaluate the level of parking that is needed for various types of development. Potentially a reduction in required car parks may be appropriate for the denser urban areas. However the councils themselves should be able to evaluate this themselves.

**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**

**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**
I don't know
How would the 18 month implementation timeframe impact on your planning processes?

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

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

Position
No

Notes

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

Notes

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

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
Not across all zones. But in areas earmarked for medium to high density development then yes

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
Streamlined consent process and other incentives for top priority development zones (e.g. urban intensification) to support that kind of work being carried out as a first step to improving NZs housing situation and city environments

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
No

Notes
We don’t need rampant development and sprawl simply as a result of demand. There is and always has been demand for development in NZ. If we just build whenever people want it then pretty soon we’ll be living in a sprawling metropolis.

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
Absolutely. That just goes without saying these days.

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
-

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

Notes
-

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
Somewhat

Notes
-

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

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
-

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
Yes

Notes
Development is obviously often in conflict with other values that New Zealand holds dearly. Biodiversity, amenity, water quality, food production, etc. This proposal needs to retain a triple bottom line approach as per RMA. We cannot foster development at the cost of these other things.

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