This submission is made by the class of UrbPlan 705 – Sustainable Infrastructure, a course in the Masters of Urban Planning (Professional) at the University of Auckland.

Due to time constraints, the submission is high level by necessity, and summarises some of the class's key concerns and suggestions.

**Key concerns**

- The NPS-UDC does not prioritise urban intensification over greenfield development in the major urban centres.

- This is concerning from the perspective of promoting urban form that is inherently more dependent on private motor vehicle use. Private vehicle use contributes a significant proportion of New Zealand's CO2 emissions in urban areas, and all things being equal expansive urban areas are more reliant on private vehicle use.

- It is not clear in the NPS-UD what 'Quality Urban Form' constitutes. Clearer national direction is required in terms of key principles, which provides for some flexibility for adaptation to local context.

- Quality urban form must include a strong consideration of an urban form that contributes to the achievement of a carbon zero endpoint.

- As a general comment, there is insufficient emphasis in the NPS-UD on climate change. This is surprising, given the government's commitment to address this most pressing issue.

- Affordable housing is not defined in the NPS-UD, and is not given enough weight. The NPS-UD focuses on the market, and while this is important a more holistic consideration of urban development and housing is required. The way the NPS-UD is drafted assumes that the market will address all housing and urban development issues. This is flawed, given there are obvious gaps in the ability of the market to respond to all housing needs.

- On page 29 of the Discussion Document it is stated: “Current planning reflects a bias towards the status quo and away from change”, and the aim is for local authorities to give weight to amenities that benefit the whole community.

The idea of benefiting “the whole community” is getting harder in today's increasingly diverse cities. A diverse community consists of multicultural groups, different ethnic groups who have different life styles and needs. When there are different voices, which group's voice is seen as the “louder” one? Which group(s) should be represented by others? What is our commonality and how shall we seek/build it?
In some cases, “NIMBY” is a legitimate collective voice of the community. How can local authorities justify/implement urban intensification in such communities (in relation to benefiting “the whole community”)? Is localism dead, and centrism now the dominant paradigm? How is this reconciled with the government’s emphasis on public participation and local democracy?

Regarding the barriers to apartment development mentioned by some developers on p43. The developers are no doubt correct about the added costs resulting from height limits and balcony requirements. But if the government just looks at this superficially and takes it too literally, and drops these requirements, it could produce some short-sighted policy, and results. It’s dangerous to identify the wrong question/issue. Do we just want to rush to build sub-standard houses with lower ceiling heights, small floor areas and no private open space just to achieve development capacity goals? Or rather take a little time to address some more fundamental issues in the building industry (eg. promote training & competition), while building good-quality houses that can actually last?

Some suggestions

- Embed climate change considerations as a central element into the NPS-UD, especially with regard to developing Future Development Strategies.

- Prioritise urban intensification when providing for development capacity. Minimum requirements could be set with regard to the proportion of capacity provided for in existing urban areas. A higher bar should be set in terms of expectations for councils to provide for as much capacity as possible in brownfield locations, before reverting to ‘the easy option’ of greenfield rezonings.

- Clearly set out measurable expectations for densities in urban areas, and set minimum density requirements for high density zonings.

- Set the requirement for all major urban centres to implement Rural Urban Boundaries, as one of a number of tools to consolidate urban growth.

- More explicitly promote active and public transport in the NPS-UD, and an urban form that will better support such modes

- Rather than vague requirements around a range of transport choices for new greenfield zoned areas, set bottom lines in terms of minimum levels of service in terms of public transit.

- Within the NPS-UD empower councils to utilize more incentive approaches to promote urban intensification eg. bonus floor area provisions, greater use of financial contribution and development contribution policies, fast track processes.
- Remove minimum parking requirements, but ensure this action is complemented by greater explicit requirements in the NPS-UD to plan for active and public transport modes. In and of itself, removing minimum parking requirements will not be effective and could generate unintended consequences.

- When commercially feasible development capacity is shown to be insufficient in the Housing and Business Capacity assessments prepared by councils, ensure that the NPS-UD allows for dialogue with the government on the extent to which non-market housing approaches may be required. The NPS-UD currently assumes potentially dangerous incremental de-regulation will occur in order to arrive at commercial feasibility. Are the short term ‘benefits’ of this worth the longer term costs?