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

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1.1 Introduction
My name is Malc Dartnall a long-term resident of the medium sized town of Rangiora in the Waimakariri District. I have 30 years of experience working as surveyor, mainly in Canterbury and are very well acquainted with plan issues in that region. Recently I have also began working in Auckland and am gaining experience of a whole new range of planning issues which effect that region.
I am very concerned as to the broad thrust of the proposed National Policy Statement on Urban Development which appears to be an effort to enforce intensification in major urban areas, limit housing choice, and intentionally “constrain the decision-making autonomy of local authorities.” (refer to the cover sheet of proposed National Policy Statement on Urban Development).
2.0 Detail of Submission.

2.1 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?

It is important that all councils plan and make room for growth, and that growth is managed to a national standard. It must be recognised by the national policy statement that the market is the key driver for growth. Growth needs to cater for what the market requires, which can vary from region to region. Local authorities have an important role to play in recognising the needs of the market, and planning/responding to it.

2.2 Question 2. Do you support the approach of targeting the most directive policies to our largest and fastest growing urban environments? Why/why not?

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

The approach to identifying which local authorities are categorised as major urban centres is seriously flawed, and the results are totally incorrect. The Waimakariri District, population 59,200 (June 2017) is identified as one of these areas. The largest town in the District is Rangiora has a population of only 18,300 (June 2018). This makes Rangiora only a medium size town, yet the same draconic provisions of the national policy statement apply as the major centres of Auckland, Wellington and Christchurch. How is a small town to have the resources to meet those measures? What effect will such measures have on a small town?

2.2.2 Can you suggest any alternative approaches for targeting the policies in the NPS-UD?

The NPS-UD needs to work with the relevant local authorities to correctly identify the areas to which the most directive policies apply. It is incongruous with the stated aims of the NPS-UD to enforce intensification in smallish towns and restrict car parking in rural areas with little public transport.

2.3 Question 3. Do you support the proposed changes to Future Development Strategy’s (FDSs) overall? If not, what would you suggest doing differently?

The writer broadly supports the requirements to identify areas where urban/business growth can occur and the requirement for the development of infrastructure to support that growth. However, one of the stated aims of the NPS-UD is to provide “housing choices” (NPS-UD p13) an FDS should show how that is achieved.

Choice, in the Shorter Oxford Dictionary means “a variety and abundance to choose from; a scope or field of possibilities.”

An FDS needs to acknowledge a field of possibilities in the housing market, that is smaller affordable houses, family sized homes and large architectural mansions. For an FDS to be relevant there needs to be analysis on the demand for different types of houses to provide for one-person households, couples, multi-person households, but most importantly, parents with children- it is the provision for the next generation that will measure a local bodies success.
2.4 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?
I support the rationale behind the policy “Some planning decisions on urban development appear to consider only the effects on the natural environment or specific amenity considerations, and not how the urban environment meets the social, economic and cultural needs of people and communities. Many decisions focus on the adverse effects of development, and do not adequately address its benefits (including for future generations).” (p27)

However, to meet “the social, economic and cultural needs of people and communities” it is necessary to provide for smaller affordable houses, family sized homes and large architectural mansions. Objectives O2-O3 and policies P2A-P2B do not state that clearly enough. A lot of local bodies currently think that providing choice means forcing developers to produce smaller and cheaper houses. One of the Ministry staff at a public meeting on this consultation actually told me that larger family size homes could be catered for with “existing stock”, it is not credible to suggest no more family homes need to be built, but that is what ministry staff, on the consultation for this document, are telling local body representatives, and the public.

I strongly suggest the Ministry follow the rational of their own policy and strengthen the wording to support it.

2.5 Question 5 Do you support the inclusion of proposals to clarify that amenity values are diverse and change over time? Why/why not?
I support the rational that” Local authorities should consider how to meet the needs of the whole community, rather than just a small minority.” (p28) This does not however, negate the fact that the most influential person on the planning chain, is the landowners/developers themselves. If development becomes uneconomical, they will, and do, lock up their land. It be will necessary for Local bodies to include local developers in the formation of local policy surrounding the draft policy P3A to ensure it is profitable to meet the stated needs.

2.6 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?
It is the housing market that will determine whether “development capacity that is both feasible and likely to be taken up”. This question needs to be directed to the local developers and land agents. The local bodies will need to refer to these professional people in the formation of policies P4A-P4G. Those policies should be amended to reference market conditions as the actuator of development.

2.7 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?
This question needs to be directed to the local developers and land agents. The local bodies will need to refer to these professional people in the formation of policies P5A-P5D. Those policies should be amended to reference market conditions as the actuator of development.

2.8 Question 8 Do you support policies to enable intensification in the locations where its benefits can best be achieved? Why/why not
The rationale behind these policies is both fundamentally flawed and a threat to property rights as we understand them in New Zealand.

The NPS-UD states “Part of the reason for the current constrained supply of housing and continuing unaffordability is the limited choice and variety of well-integrated, higher-density housing. A lack of higher-density housing fuels higher prices across entire cities, not just where intensification might be appropriate.” *(p37)* This statement is fundamentally incorrect, intensification can only possibly drive land prices up, which in turn can only push housing prices up. The type of intensification which P6C refers to involves building practises which are exponentially more costly than building a bungalow in a new greenfield area.

The NPS-UD continues “… *One cause is a political bias towards local propertied interests. Restrictions on intensification often reflect the interests of current property owners*” One would sincerely hope that the interests of property owners are fully respected in government policy. The land belongs to the holder of the title. Indefeasibility of title is a core concept of New Zealand property law.

The writer has seen first-hand, the detrimental effects of enforced intensification in the town of Rangiora. It was a well-meaning policy, agreed to in the Greater Christchurch Partnership following the Canterbury earthquakes to require new greenfield areas to yield 10 household/ha (recently changed to 12/ha). The result is the all new areas have small houses with no yards for outdoor activity. If you are in the housing market, every house for sale has basically the same layout—there is no choice in the new greenfield developments created under these policies. We have already tried forcing greater intensification in greenfield areas, the results are an ugly failure, and large increases in property prices.

Policy P6C would result in a ban on families (parents with children) living close to city centres or active transport modes. The type of densities being discussed are unsuitable for family living. Both options for policy P6C need to be withdrawn from the NPS-UD entirely.

**2.9 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?**

I strongly support this policy and the rationale behind it. Areas identified by local bodies for future development become out of date very quickly, and the market may require areas elsewhere. Often areas identified in long term planning documents lie dormant because the market is seeking development in more attractive areas. An avenue to open such areas up via a plan change should be very carefully considered by a local council, if a developer came forward with a feasible proposal.

**2.10 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?**

The writer cannot possible support this policy which is based on a very faulty rational. It is a stated aim of the NPS-UD to provide transport “*choice*”. The major “*choice*” for most people is the car, so policy must provide for that “*choice*” in order to achieve the aims of the NPS-UD.

It comes back again to the definition of a “*major urban centre*” which under this proposed NPS-UD includes medium sized towns like Rangiora. The key customers to Rangiora business are from the vast surrounding rural areas with absolutely no access to public transport whatsoever. Business is bound to provide parking for them, and the local council should make sure that’s done.
“Education campaigns on the benefits of travel by other modes” (p41) will likely produce a similar result to King Canute commanding the tide to stop coming in back in 1028. Policy P7A options 1, 2 and 3 should be deleted from the NPS-UD.

2.11 Question 11 Do you think that central government should consider more directive intervention in local authority plans?
Local authorities are democratically elected. "No-one pretends that democracy is perfect or all-wise," Winston Churchill observed in 1947. "Indeed, it has been said that democracy is the worst form of Government except all those other forms that have been tried from time to time." Any erosion of democracy will result in a worse result than we have now, regardless of how imperfect democracy is.

2.12 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?
Yes, I support that policy, but that assessment requires the direct input of local landowners, developers, builders and land agents, local people who know the market. The NPS-UD should acknowledge this important fact.

2.13 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?
My understanding of the Treaty of Waitangi is that Māori would have the queen’s protection and all rights – ‘tikanga’ – accorded British subjects. It is important that this principal is upheld.

2.14 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?
My understanding of the Treaty of Waitangi is that Māori would have the queen’s protection and all rights – ‘tikanga’ – accorded British subjects. It is important that this principal is upheld.

2.15 Question 15 What impact will the proposed timing for implementation of policies have?
My local council (Waimakariri District) at the late stages of releasing a new Proposed District Plan. The timing of this proposed NPS-UD couldn’t possibly be worse, however I’m unaware of any other local body in the same situation- we might be unique!

2.16 Question 16 What kind of guidance or support do you think would help with the successful implementation of the proposed NPS-UD?
The final NPS-UD will need to take account of submissions received as part of this consultation period.

3.0 Summary of Submission
The writer strongly supports the aim of NPS-UD to provide people housing choices but is concerned that several the policies will restrict choice. New housing development must cater for different household types that is one-person households, couples, multi-person households, but most importantly, parents with children. To cater for a range of household types requires a range of different types of housing including smaller affordable houses, family sized homes and large architectural mansions.
Intensification of housing limits choice drives up land prices and building costs. Local bodies need to show caution as to where intensification happens.

Thank you for the opportunity to submit on this discussion document.

*Malc Dartnall.*