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

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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
It is important to control where and how growth happens so that it doesn’t happen ad hoc. Many major developments at the moment are not being delivered with quality urban environments, so that is also important for central govt to guide.

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
When considering the development community, statutory tools are usually most effective... Though more statutory tools at the local govt level would be better, to enable cities to develop tools most suited to their growth and urban environments.

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
Areas that do not have high growth definitely don’t need as much guidance on how to grow. Need to be able to review this as the fastest growing areas can change reasonably quickly.

Clause
Question 3. Do you support the proposed changes to FDSs overall? If not, what would you suggest doing differently?
Position
Somewhat
Notes
It doesn’t seem to make sense to review these every three years, as the purpose is to provide certainty to communities and developers for a longer timeframe. Overall, future development strategies are very important for this certainty, as well as for infrastructure planning.

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
It is important for any town or city to have a high quality urban form, and this can often be delivered through strategic planning e.g. ensuring there is plenty of green space, or that roads are able to cope with higher local populations. Though this process may not be worth the expenditure for smaller councils.
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
Review periods should be less frequent, as these strategies are intended to provide certainty for a longer time period, rather than changing frequently. By the time an identified future development area has gone through structure planning and plan change phases, it will be close to three years later.

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
Somewhat

Notes
I support the direction on quality urban environments. Having the quality urban environment guidance in a preamble (rather than in the regulation itself) will not deliver the desired outcomes. This needs to be in the policy itself.

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
The draft objective needs to include more factors of quality urban environment, including ecological, resilience, safety, and cultural factors. These should not only be in the preamble.

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 people in NZ cities will need to get used to different forms of ‘amenity’. While the regulations might support this, it will be much more important to focus on education and outreach, most likely done by local govt.

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

Notes
Urban areas may be designed too much for the ‘current trends’ - places and spaces need to have longevity as well as current appeal.

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

Notes
Enable local governments to define amenity in their structure planning processes, and regulate that these are delivered.

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
I don’t think most of the community even knows what zone they live in, let alone the rules and regulations within that zone.

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

Notes
Amenity values can change more quickly than plans can change, however some amenity values may be useful to include e.g. green/open space amenity.

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
Intensification near city and town centres, near transport hubs, and near parks needs to be encouraged if we want to limit urban sprawl.

Clause
What option/s do you prefer for prescribing locations for intensification in major urban centres? Why?
Position
Option 2 (the prescriptive approach)
Notes
Enabling discretion is likely to continue political bias toward existing property owners. However, if a prescriptive route is taken, there needs to be a variety of exemptions e.g. heritage buildings.

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
Residential dwellings per hectare could encourage very small, one-bedroom dwellings - not catering to much of the population. Perhaps minimum floor area would be better, otherwise minimum dwellings of a variety of types.

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
Out of sequence development or development in areas not identified for development negates the purpose of the FDS. It makes it much more difficult for infrastructure providers and their suppliers/contractors to plan works. It can lead to reverse sensitivity issues if development occurs where surrounding land uses remain more rural. The areas in the FDS are identified for a reason - as they are most suitable for development, so developing elsewhere is by definition going to be in a less suitable location.

Clause
How could the example policy better enable quality urban development in greenfield areas (see discussion document, page 37)?
Notes
This policy enables development not in plans far too much. Their would be relatively minimal grounds for a development to be denied.

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
No, the policies are relatively weak and would be relatively easy for a developer to demonstrate. This would enable too much development in areas not identified for development.

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
It is inequitable for existing residents to fund (through rates) too much of the infrastructure for new developments, especially greenfield. These should be predominantly funded by developers, as this is only benefiting the residents in that development. This may make developments further from the existing city much less affordable - though this should discourage development far from the city. Infrastructure upgrades required for brownfield intensification benefits both existing and new residents, so could be funded through a more even split of council funds (rates) and developer funds. If central gov't would like to subsidise development, this should come from central gov't funding, not councils.

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
By definition, the areas identified for development are most suitable for people to live. This is the purpose of a FDS.
### 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**  
There will be places in NZ cities where not everyone needs a car - this is a good thing and should be encouraged. However, providing less car parks cannot be achieved in all development locations e.g. Addison greenfield development in Auckland - provided limited car parking far from the city with limited public transport - now all residents have cars but parking is very difficult. Developers should not be enabled to take away car parks simply to provide more dwellings to gain more profit, if this will reduce the liveability of the area.

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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**  
Car parks are still needed in NZ unless the areas have been identified for intensive development due to proximity to public transport. There are more innovative car sharing solutions coming, but these typically only work in areas of higher density as well.

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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**  
Lower density areas where people will need to have cars, regardless of whether their property comes with a carpark or not, will not be over-run with cars parked in places they shouldn’t be (e.g. Addison). Less car parking in higher density and commercial areas may encourage more public and active transport to and from these areas (e.g. more PT from lower density areas to work, while using cars for other trips).

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

**Position**  
Somewhat

**Notes**  
Local governments are best at consulting with and understanding local community interests. However, some national guidance e.g. for ecological outcomes in urban environments, may be useful for regulating what developers are able to do, with a level playing field across the country.

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### 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, higher density development is not suitable in all residential areas.

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### 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**  
Yes

**Notes**  
This makes sense.

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### 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**  
The Essential Freshwater package indicates 'Te Mana o Te Wai' and healthy waterways should be of utmost importance. streams/wetlands should not be lost for nearly any reason, and water-sensitive design should be used in development. The NPS-UD does not place enough significance on protecting waterways (and the environment more broadly) through development.