To whom it may concern

Subject: Proposed National Policy Statement (NPS) on Urban Development

I write in relation to the proposed NPS-UD, and it appears that the NPS-UD will make a material improvement to the development capacity in major urban centre’s however I believe it will fall short of what is required in the medium and long term.

Brownfield Development

The discussion document states on page 15 that “the aim is to encourage effective growth, particularly close to public transport and walking and cycling facilities.”

As a result, I believe that development capacity should prioritise Brownfield areas ahead of Greenfields areas as it will be more cost effective to provide the necessary development infrastructure and transport networks that are required, and it will obviously reduce urban sprawl and thereby encourage development that is centrally located and near job opportunities.

Restrictions on Development

The discussion document states on page 14 that “we need to remove unnecessary restrictions on development to allow growth up (e.g. higher density housing near existing services and infrastructure),” and on page 22 it states “local authorities limit their provision of development capacity because of constraints on infrastructure funding.”

It is important that infrastructure funding is identified as a restriction on development capacity; however there is no mention about two further restrictions on development capacity as outlined below:

1) Site configuration – many sites that are suited for high density have a configuration (i.e. shape or size) that is inappropriate to construct buildings of a meaningful scale. For example, refer to the appendices for a building recently constructed in Auckland in the Terrace Housing and Apartment Building Zone.
2) Intention of current owners – many sites that are suited for high density are owned by parties that don’t intend to sell or develop the land in the foreseeable future. There are obviously a range of reasons for this, such as:
   o The owners don’t have the required skill set to undertake a development.
   o The owner’s main motivation is to profit from land banking.
   o The owner’s main focus is to continue their current use for the site, such as for residential or business use.

The above two restrictions are major hurdles to achieving the density that is required and the best way to overcome these restrictions is for Central Government intervention as follows:

1) Compulsory acquisition (under the Public Works Act) of properties in areas suited for a greater density.
2) Site amalgamation - adjacent sites that have configuration issues are amalgamated to enable large scale developments to be undertaken.
3) Sale of these properties to developers, and on sale terms to ensure that the sites are developed to their highest and best use within a certain timeframe.

Without intervention measures as outlined above, the Brownfield areas particularly will continue to have fragmented ownership and they won’t be developed in the long term to the density that is required. As a result, there will continue to be a lack of development opportunities and the under achievement of these areas will continue.

Implication for the NPS-UD

For the NPS-UD to assist in overcoming the above restrictions, I believe that the following should be undertaken:

1) Priority for Brownfield development – the NPS should clearly state that Brownfield development is to be prioritised ahead of Greenfield development.
2) Restrictions on development – the discussion document has rightly referred to the infrastructure funding as a restriction, and the NPS should include “site configuration” and “intention of current owners” as key restrictions on development capacity.
3) HBA & FDS preparation – these documents should identify sites that are influenced by the various restrictions on development capacity (as stated above), and which therefore need to be considered for intervention measures.

Once the above has been incorporated it is imperative for Central Government agencies to ensure that the interventions measures are undertaken, and which will result in a greater density near existing infrastructure and transport networks.

Yours sincerely

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Appendix A

Baldwin Ave Train Station in Mt Albert, Auckland

The plan below illustrates the restrictions around the Baldwin Ave Train Station, as follows:

- Intention of current owners – the surrounding sites are generally privately owned for residential use and are unlikely to be developed to a greater density within the long term.
- Site configuration – the parcels of land are generally too small to construct a large scale building.
Appendix B

Example of Restrictions on Development Capacity

Below is an image of a building recently constructed in Mt Albert, Auckland.

The zoning is THAB and permitting a maximum height of up to seven levels; and this property owner has built to the maximum height in relation to the boundary (after allowing for recession planes).

This example illustrates that when the site configuration is not appropriate the outcomes are less than desirable.

To resolve these issues, a compulsory acquisition and amalgamation of adjacent sites will then create a parcel of land that will enable a building to be constructed to the maximum permitted height for the THAB zoning (i.e. seven levels).
Appendix C

Built Environment in St Lukes, Auckland

Below is a plan view from the Unitary Plan and outlining the THAB zone that surrounds the St Lukes shopping centre.

This area is very well suited for high density housing as it is zoned for up to seven levels and has the necessary amenities in the surrounding area, such as a train station etc.

However, due to the restrictions on development in this area (due to “site configuration” and “intention of current owners”) it is very unlikely that the density intended by the THAB zoning will be achieved in the long term.

As a result, interventions will be required by Central Government, and this is best achieved by the local authorities identifying the sites that require intervention measures (in accordance with the NPS-UD) and Central Government agencies implementing the intervention measures.