

SUBMISSION ON THE PROPOSED NATIONAL POLICY STATEMENT ON URBAN DEVELOPMENT

Submitters' Details:

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1. This submission is made in a personal capacity by professional Urban Planners, Matthew Paetz and Bruce Weir.
2. Between us, we have more than 40 years' professional experience in urban and regional planning policy and development, across New Zealand and Australia – this includes the development of new Plans and planning instruments, policies and strategies, masterplanning for new towns and airports, rural community planning and project work on more than 50 medium and high density housing projects.
3. Whilst we consider the draft NPS to be an important step forward in addressing housing capacity, and has many strong elements, we consider that the NPS could be improved significantly by taking a 'City-Region' approach to housing capacity, rather than focussing exclusively on 'urban' housing capacity. The reality is that urban areas all around the world are decentralised to greater or lesser extents, and the rural hinterland of large cities is an extension of the urban area in terms of reciprocal functional relationships. It is a false division to separate the rural and urban areas of 'City Regions' into 'black and white' categories.
4. Also many existing rural zonings close to City urban fringes (e.g.. Countryside living) are in effect future urban zonings in guise.
5. In taking a 'City-Region' approach this would mean, for example, that in planning for future housing capacity in Auckland, the city's large rural hinterland could be utilised as a resource to provide for Auckland's housing needs.
6. More specifically, we have undertaken high level preliminary analysis that suggests that 'Rural Hamlet Zones' (between say 8-10 in number) occupying only 10-15% of Auckland's rural hinterland, outside of areas proposed as 'Future Urban' zones under the Proposed Auckland Unitary Plan, could enable realistic (as opposed to theoretical) housing capacity of 50,000 to 70,000 dwellings. This would represent around 15-20% of the housing required in Auckland by 2040, a significant contribution (and more importantly, as outlined below, one not hindered by the need to fund and construct large scale trunk infrastructure).

6. Such zones would be identified to avoid highly productive agricultural land and highly sensitive ecological locations. Typically, they would be located near coastal areas or within twenty kilometres of rural towns. Each hamlet development would need to maintain at least 60-65% of the site as open space, in order to help maintain rural character and amenity. Water, wastewater and stormwater would be managed on-site. **Attachment 1** to this submission illustrates the concept, with plans and illustrations from publications written in the USA by Randall Arendt for the American Planning Association, and American Society of Landscape Architects, where this approach has been employed.

7. Each 'Rural Hamlet Zone' would comprise communities within a community, and would either support and strengthen existing rural towns or lead to the creation of new community hubs. By adopting this approach, the following is then enabled:

- a. Productive land to be consolidated and aggregated - enabling economically viable rural activity
- b. Ecological repair and restoration
- c. Protection of future infrastructure and open space corridors

8. In the case of Auckland, such an approach could take significant pressure off existing urban areas in terms of the need to intensify, and would also reduce reliance on new greenfield housing developments that rely on the funding and delivery of costly public infrastructure. As the capacity enabled by this approach does not rely upon sequenced infrastructure delivery, it allows the potential for a significantly more 'elastic' housing supply response. This approach could be particularly beneficial to Auckland in the mid term (ie. by 2030), given the time anticipated to deliver a number of developments in areas zoned 'Future Urban' in the Auckland Unitary Plan.

9. This approach would provide Councils and their communities much greater flexibility in terms of how to approach the need to provide for housing capacity, providing further options to the urban planning mainstays – urban intensification, or greenfield development.

10. We submit that the following amendments should be made to the draft NPS to address our submission:

- New definition:

City-Region means the urban area of a settlement plus that area of the region within which the city is located which is clearly within the direct sphere of influence of the city. Sphere of influence should be determined on a case by case basis, but should generally be limited to rural areas which are located no further than 50km from the edge of urban areas.

- Amendment to definition of 'Development Capacity':

Development capacity means in relation to residential and business land, or rural land used for housing, the capacity of land for ~~urban~~ development to meet demand, taking into account the following factors:

- *The zoning, objectives, policies, rules and overlays that apply to the land; and*
- *The provision of adequate infrastructure, existing or likely to exist, to support the development of the land, having regard to-*
 - *The relevant proposed and operative regional policy statements, regional plans and district plans; and*
 - *Any relevant management plans and strategies prepared under other Acts.*
- ***The ability of any rural areas used for housing, to complement urban development capacity, to address servicing needs on any site subject to development***

Amendments to Objective Group A:
(amendments shown as underlined)

Objective Group A – Outcomes for decision-making

OA1: To support effective and efficient urban areas and /or city-regions that enable people and communities to provide for their social, economic and cultural wellbeing.

OA2: To provide sufficient residential and business development capacity to enable urban areas and / or city-regions to meet residential and business demand.

OA3: To enable ongoing development and change in urban areas and / or city-regions.



M Paetz / B Weir
15 July 2016

Attachment 1: Hamlet Zoning concepts

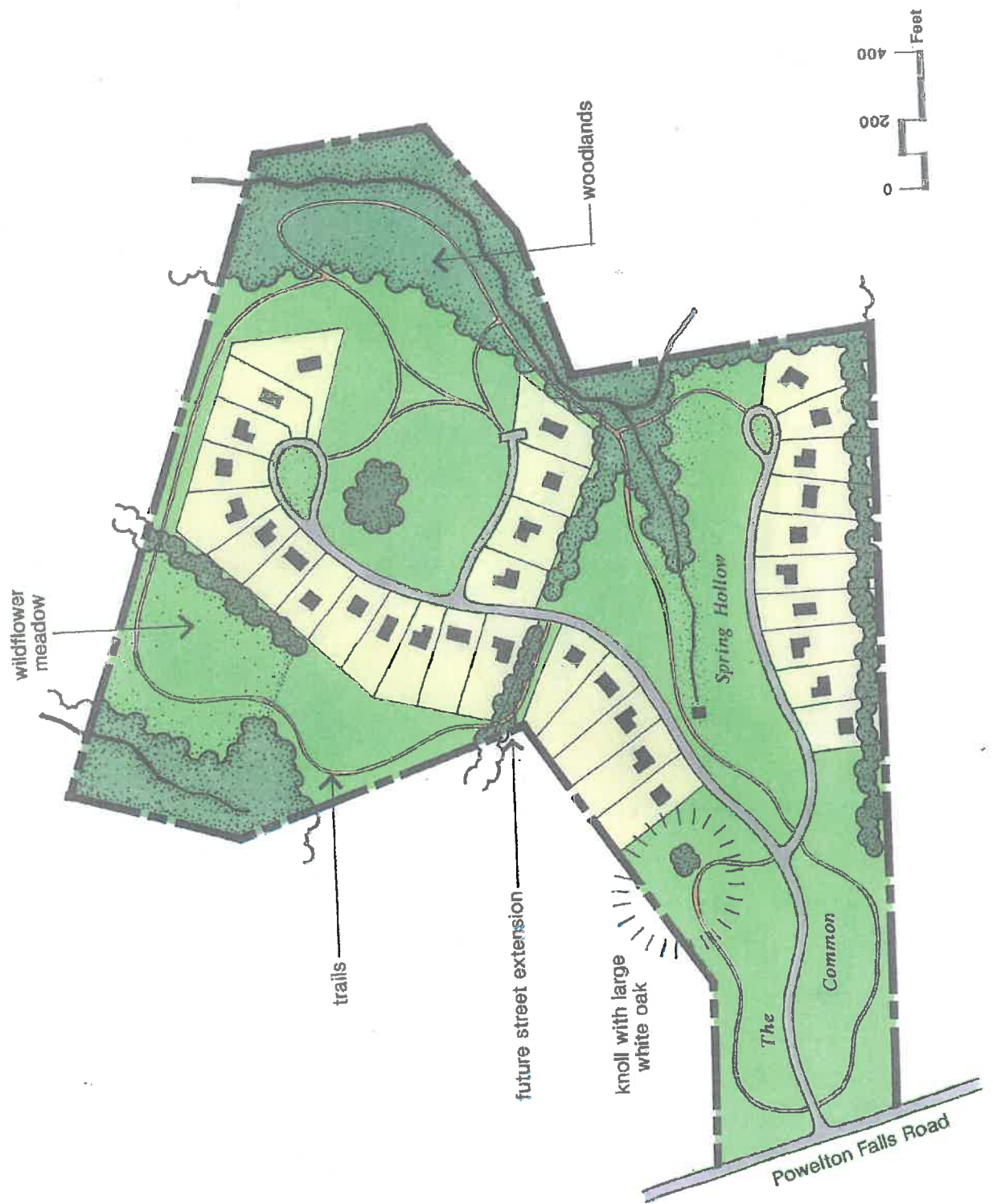
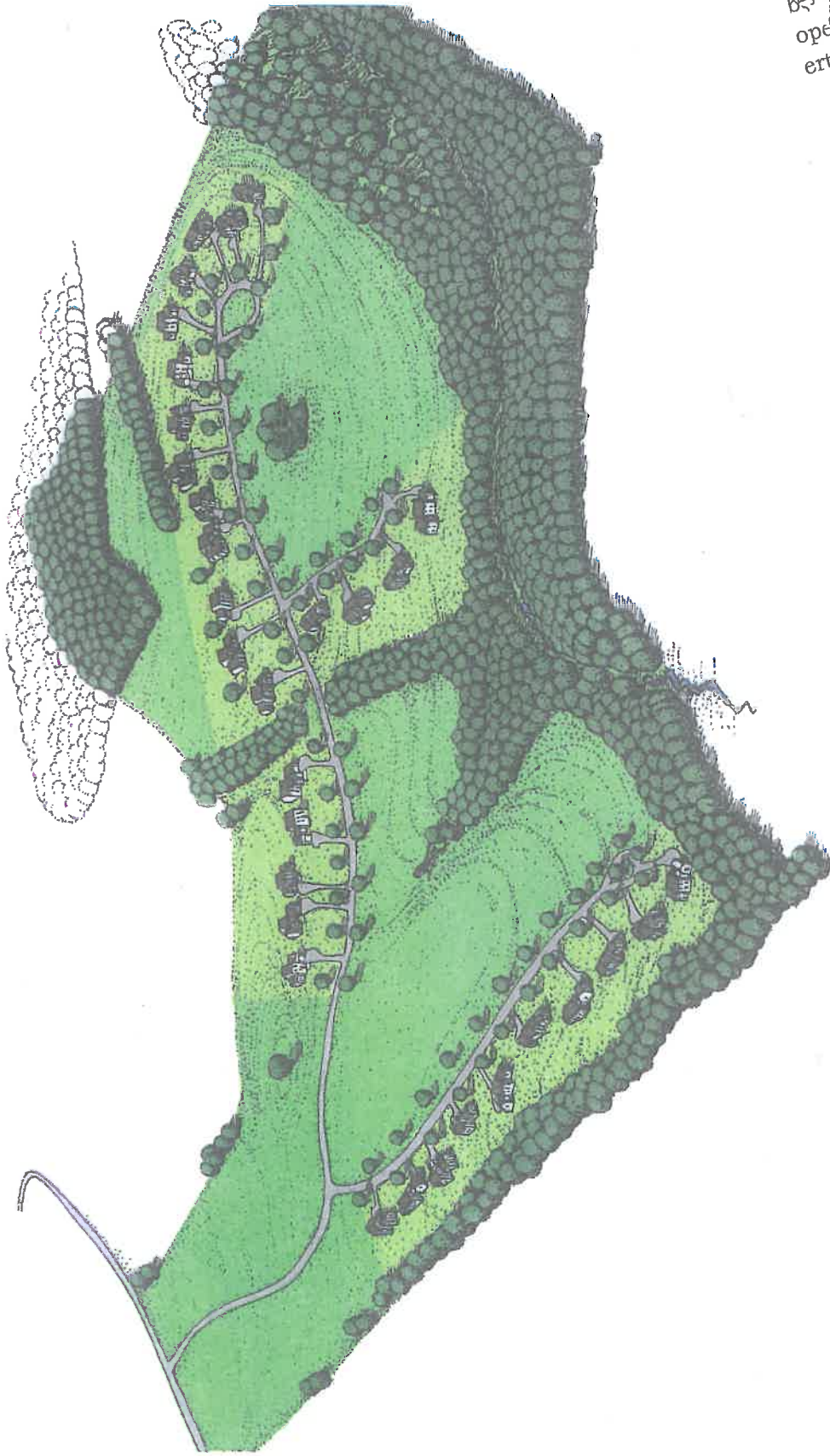


Figure 7A-9. Site A: Drawing in the Lot Lines



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Figure 7A-10. Site A: With Conservation Design

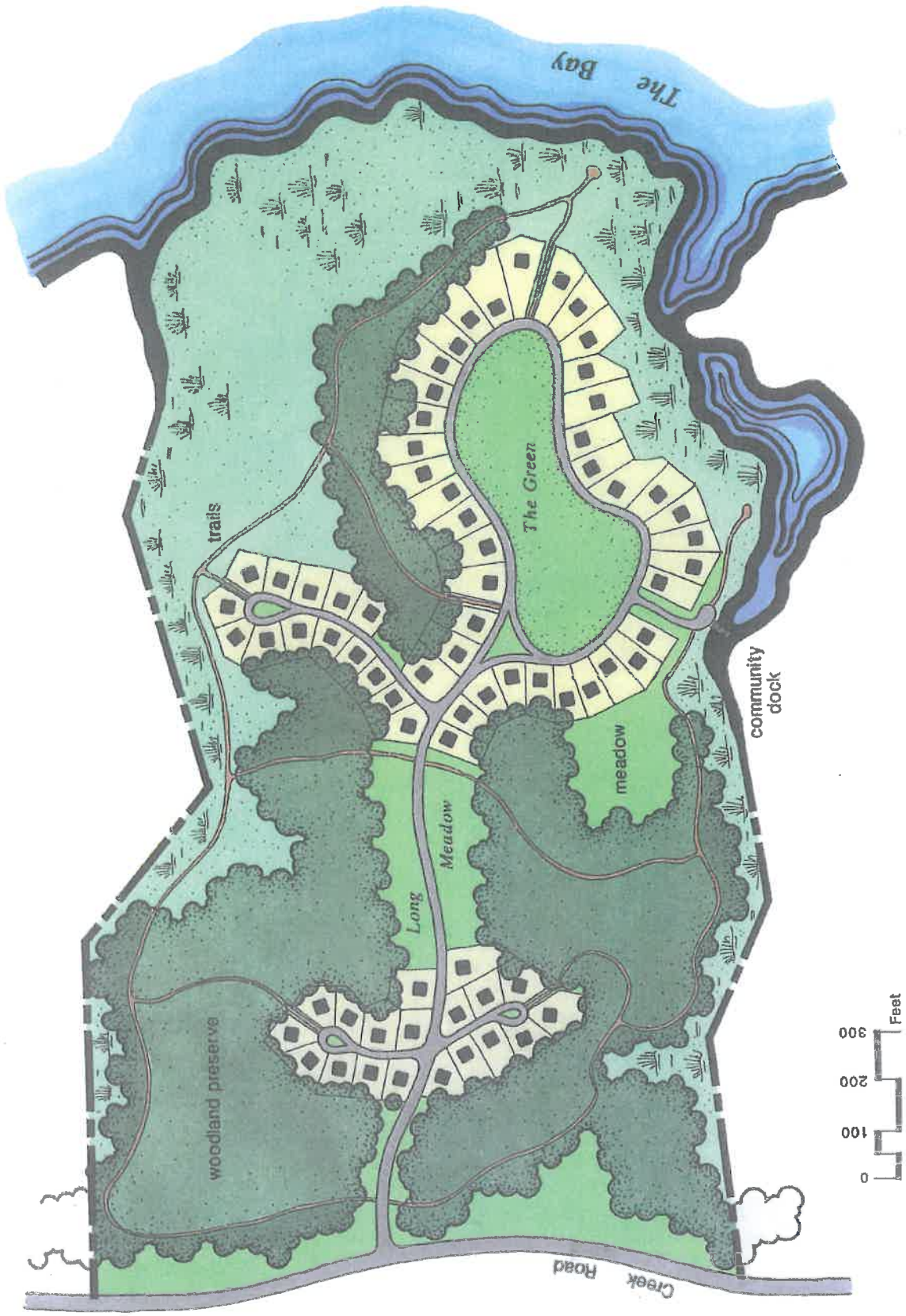


Figure 7C-9. Site C: Drawing in the Lot Lines

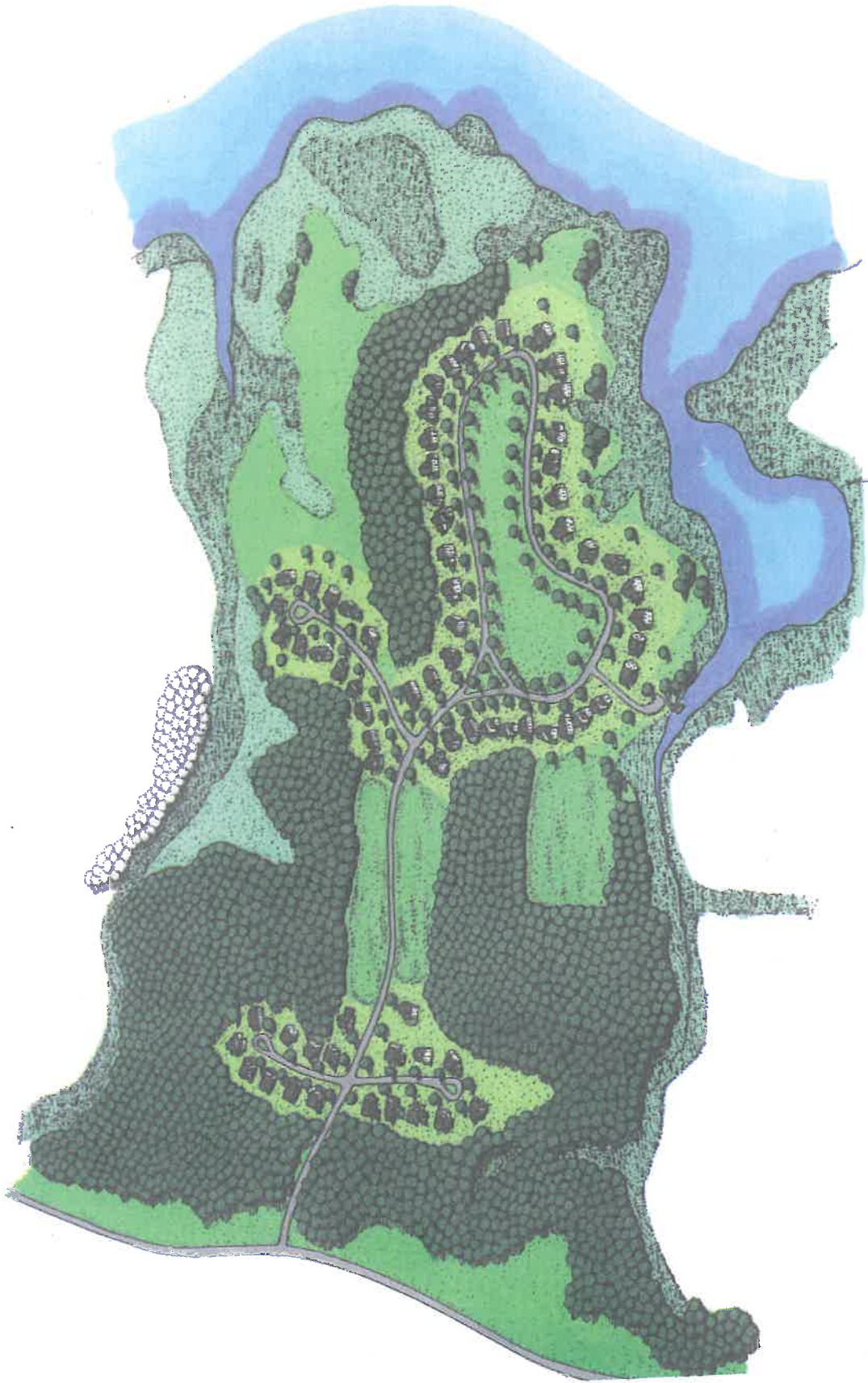


Figure 7C-10. Site C: With Conservation Design

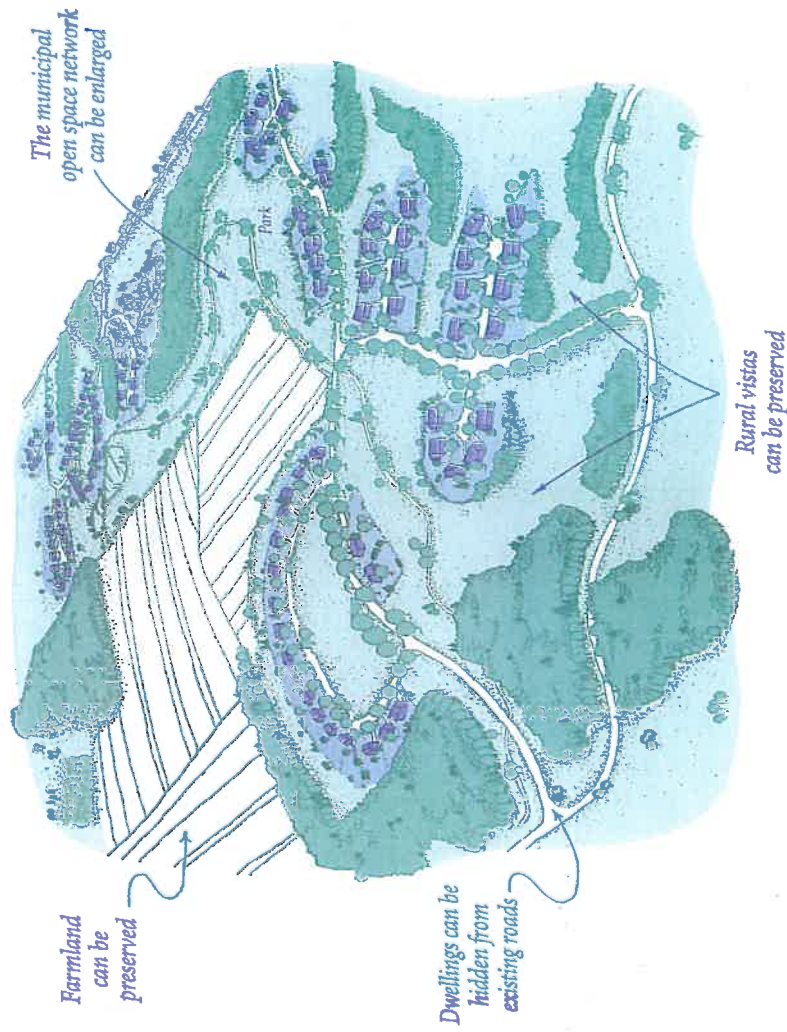


Fig. 1.12

sufficient funding to finance PDRs and when TDRs are not politically feasible.

NOTES

1. Emily Talen, "The Social Goals of New Urbanism," *Housing Policy Debate* 13, no. 1 (2002): 165-88.

2. Yield plans and all the other technical details relating to conservation design are fully discussed in my *Growing Greener: Putting Conservation into Local Plans and Ordinances* (Washington, D.C.: Island Press, 1999).
3. The *Stewardship Handbook* is available free of charge on the Natural Lands Trust website: www.natlands.org/handbook.