

30 September 2019

Hamilton City Council
City Planning Unit
Private Bag 3010
Hamilton 3240

Via email: districtplan@hcc.govt.nz

Re: Feedback on Hamilton City Council (HCC) Plan Change 11

1. Introduction

- 1.1 Property Council New Zealand's Waikato Branch (Property Council) welcomes the opportunity to provide initial feedback on Hamilton City Council's (HCC) Plan Change 11. This feedback reflects the views of a selection of our Waikato-based members.
- 1.2 Property Council is a member-led, not-for-profit organisation representing New Zealand's commercial, industrial and retail property owners, developers and professional service providers such as architecture, engineering, planning and construction firms. Property Council's Waikato Branch has 102 businesses as members.
- 1.3 The property sector contributes \$2.6b or 13 per cent of GDP in the Waikato area and employs 13,980 people. Making it the region's second largest economic sector.
- 1.4 Property Council members design, develop and own the buildings that house the businesses, communities and people of Waikato. Our primary goal is the creation and retention of well-designed, functional and sustainable (including economically) built environments which contribute to New Zealand's overall prosperity. We support city's that provide a framework to enhance economic growth, development, liveability and growing communities.
- 1.5 Our members are generally supportive of the intent of Plan Change 11 and acknowledges the role that increased intensification plays in achieving a compact city and a sustainable urban form. This contributes to housing choice, affordability, and cost efficiencies in infrastructure and public transport provision.
- 1.6 Property Council also notes the proposed revised National Policy Statement on Urban Development (NPS-UD) and its need for more intensification and density outcomes for growth areas. There are likely to be requirements placed on councils for more integrated planning of key infrastructure and density. We suggest developing this plan in conjunction with the new NPS-UD requirements could be a more efficient and cost-effective process combining this Plan Change 11 with the new NPS-UD requirements.

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Rule	Support / Oppose	Reasons	Relief Sought
<p>4.3.1(c) – activity status table</p> <p>Apartment Buildings</p>	<p>Support</p>	<p>The proposed amendments incentivize the construction of apartment buildings in the General Residential Zone on sites adjoining, or immediately opposite, publicly owned sport, recreation, and neighborhood open space zoned land by changing the activity status from discretionary to restricted discretionary. While a resource consent is still required, the consenting process will be simplified and should be faster.</p> <p>Property Council supports the changes to Apartments in the General Residential Zone enabling activation of parks and open spaces and assisting in meeting the strategic infill growth imperatives.</p> <p>We reiterate the importance of ensuring that the intensification imperatives and outcomes sought by Plan Change 11 do not result in significant adverse effects on residential character, visual amenity, or result in poor quality built form. Consideration should be given to the suitability of the existing assessment criteria for restricted discretionary activities in this context to ensure that poor quality infill is avoided.</p> <p>Property Council also recommends making apartments in the Residential Intensification Zone a non-notified activity.</p> <p>We also suggest that the “Destination Open Space” be included as a location where apartment buildings are incentivized. This will enable qualifying areas adjoining or adjacent to Hamilton Gardens, Hamilton Lake Domain, Claudelands, and Minogue Park, will be included in areas for apartments to be incentivized.</p>	<p>Retain proposed amendment</p>

4.4.1(a) (i) – Density	Support	<p>The proposed amendments reduce the net site area for single dwellings in the General Residential Zone from 400m² to 300m² per residential unit. This encourages greater intensification within the General Residential Zone and increased opportunities for infill housing.</p> <p>This ensures alignment between the density provisions for duplexes and single dwellings may result in a greater variety of the housing types.</p> <p>The provisions may also result in additional housing types and options next to areas of open space and high amenity.</p> <p>Providing for apartments in the General Residential Zone increases the level of certainty for developers that apartment units can be established in defined areas of the general residential zone.</p>	Retain proposed amendment
4.4.1(a) (iii) – Density	Support	<p>The proposed amendments introduce an average net site area of 200m² per residential dwelling (on sites adjoining or immediately opposite open space zoned land). We also suggest that the “Destination Open Space” be included as a location where apartment buildings are incentivized, as mentioned above.</p> <p>These changes enable activation of parks and open spaces and assisting in meeting strategic infill growth imperatives. Introducing an average net site area provision provides more flexibility where there are site constraints or innovative design outcomes are sought.</p>	Retain proposed amendment
4.4.1(a) (vi) – Density	Support	<p>The proposed amendments reduce the net site area for relocated dwellings in the General Residential Zone from 400m² to 300m² per residential unit. This encourages greater intensification within the General Residential Zone and increased opportunities for infill housing, including the option of relocating dwellings onto sites as opposed to new builds.</p>	Retain proposed amendment
4.4.10(d)(v) – Outdoor Living Area	Support	<p>The amendments introduce outdoor living area requirements for apartments in the General Residential Zone of 12m² for apartments up to 2 bedrooms, plus 5m² for each additional bedroom. No dimension shall be less than 2.5m.</p>	Retain proposed amendment

<p>23.7 – Subdivision Design Standards 23.7.1 – Allotment Size and Shape</p>	<p>Support</p>	<p>The proposed amendments seek to retain a minimum net site area of 400m² for the creation of vacant lots at the time of subdivision, unless there is existing or approved development where 300m² minimum net area will apply.</p> <p>Retaining a minimum lot size of 400m² for vacant lots during subdivision may ensure that unrealistic expectations for future purchasers are not created.</p>	<p>Retain proposed amendment.</p>
<p>Appendix 15-1 (a) and (g)</p>	<p>Oppose</p>	<p>The proposed amendments require the provision of 2 car parking spaces per apartment in the General Residential Zone.</p> <p>The minimum parking requirement philosophy in the City discourages the high-level imperatives to achieve a modal shift for transportation options, including: public transport, biking and walking. This in turn limits the potential for benefits of lower emissions and reduced energy consumption. Intensification design typologies are also reduced, with developers having to take regard of excessive car-parking requirements.</p> <p>The Property Council supports a shift to maximum car parking requirements for intensification within the City to assist in promoting alternative modes of transport and reducing congestion. The NPS-UD may provide some further direction on this as it advances through the process.</p>	<p>Change proposed amendment from a <u>minimum</u> of 2 car parking spaces per apartment in the General Residential Zone to a <u>maximum</u> of 2 car parking spaces.</p>



2. Conclusion

- 2.1 Property Council largely supports HCC's proposed amendments to the Operative District Plan through Plan Change 11. However, we consider Council should be exploring the notion of maximum car parking requirements for apartments in the General Residential Zone as opposed to minimum requirements. We agree this will promote more intensification outcomes for Hamilton city.
- 2.2 Property Council wishes to thank HCC for the opportunity to provide feedback on Plan Change 11. Any further queries do not hesitate to contact Katherine Wilson, Senior Advocacy Advisor via email katherine@propertynz.co.nz or cell 027 8708 150.

Yours sincerely,

A handwritten signature in black ink that reads "Brian Squair".

Brian Squair
Waikato Branch President
Property Council New Zealand.