

Property Council New Zealand

Feedback on

**Proposed changes to Hamilton District Plan as required under the
National Policy Statement on Urban Development**

20 September 2021

For more information and further queries, please contact

Natalia Tropotova

natalia@propertynz.co.nz

021863015

20 September 2021

Hamilton City Council
Private Bag 3010
Hamilton, 3240
By email: Craig.McKibbin@hcc.govt.nz

Proposed changes to Hamilton District Plan as required under the National Policy Statement on Urban Development

1. Recommendations Summary

1.1. Property Council New Zealand (“Property Council”) would like to thank Hamilton City Council for an opportunity to have an early engagement and provide feedback on [proposed changes to Hamilton’s District Plan](#). We support intensification and believe that if done properly, it will result in great outcomes for Hamilton.

1.2. We recommend the following:

Managing growth

- National Policy Statement on Urban Development criteria analysis:
 - Review the map of proposed areas for intensification to include additional locations (e.g. Melville, Peacocke, Amberfield);
- Greenfield developments:
 - Ensure that the plan for intensification is coupled with the plan for greenfield development;

Urban design

- Mixed-use developments:
 - Take a balanced approach to mixed-use developments (e.g. not every commercial building has to have a café on a ground floor, particularly given current hospitality industry constraints);
- Role of good design:
 - Consider a wider range of options for intensification (than just a mid-rise option for locations outside of the central city area, as proposed by the Council);
 - Take a balanced approach to ensure innovation can occur to reach good design outcomes supported by a practical and time-critical urban design advisory panel;
- Intensification and land covenants
 - Consider different typologies to address issues of regional sprawl (see also the need for greenfield developments above);
- Parking requirements
 - Consider options to address a lack of short-term parking in the central city area;

Natural environment

- Apply a robust methodology when reviewing Significant Natural Areas;

Culture and heritage

- Take a targeted approach when considering what is heritage to enable more intensification while making sure appropriate sites and buildings are protected;

Pipes and roads

- Infrastructure capacity
 - Ensure that the link between zoning for intensification and provision of supporting infrastructure is clearly stated in Plan Change 12;
- Walkable catchments
 - Define a walkable catchment in the context of Hamilton;
 - Explore options to unlock more opportunities for intensification in areas served by water taxis;
 - Ensure there is an option to review walkable catchments if a site has good qualities for development with little effects on neighbours, but outside of Council's walkable catchment);

Additional comments

- Review the proposed timeframe.

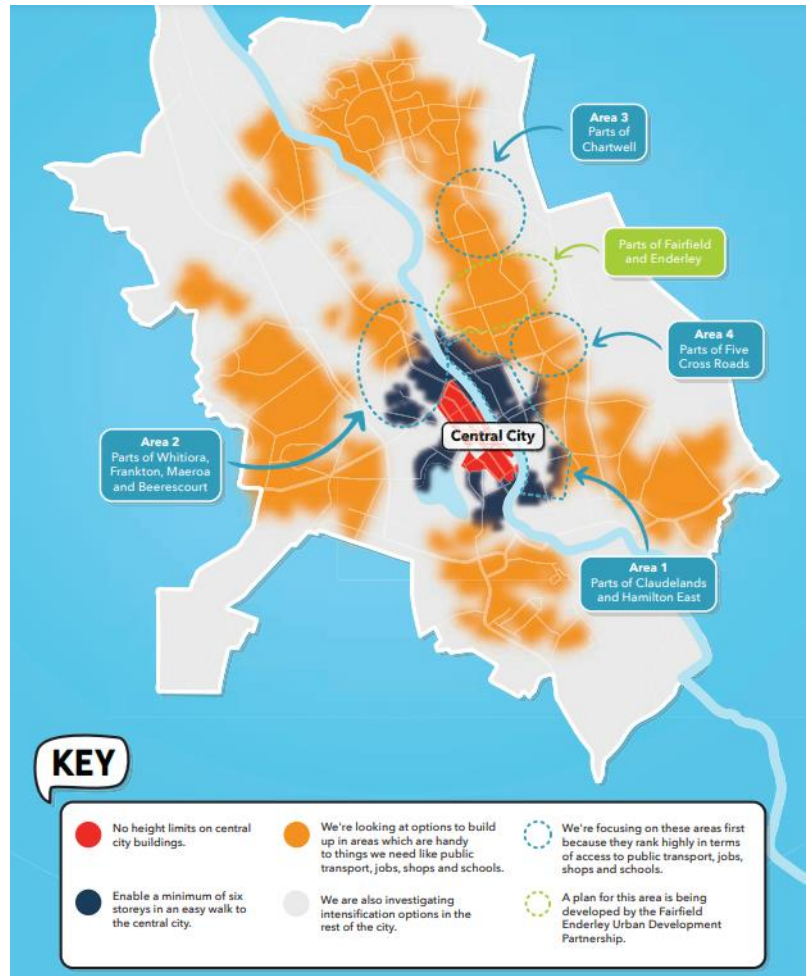
2. Introduction

- 2.1. Property Council's purpose is; "Together, shaping cities where communities thrive". We believe in the creation and retention of well-designed, functional and sustainable built environments which contribute to New Zealand's overall prosperity. We support policies that provide a framework to enhance economic growth, development, liveability and growing communities.
- 2.2. Property is currently New Zealand's largest industry with a direct contribution to GDP of \$41.2 billion (15 per cent). The property sector is a key foundation of New Zealand's economy and caters for growth by developing, building and owning all types of property.
- 2.3. Property Council is the leading not-for-profit advocate for New Zealand's largest industry – property. Connecting people from throughout the country and across all property disciplines is what makes our organisation unique. We connect over 10,000 property professionals, championing the interests of over 580 member companies who have a collective \$50 billion investment in New Zealand property.
- 2.4. This document provides Property Council's feedback on proposed changes to Hamilton's District Plan as required under the National Policy Statement on Urban Development ("NPS-UD"). Comments and recommendations are provided on those issues that are relevant to Property Council's members.

3. Managing growth

NPS-UD criteria analysis

- 3.1. The map shows areas of Hamilton being investigated to meet the Government's requirements under the NPS-UD. We encourage the Council to explore additional options for intensification. For example, Melville has more land undeveloped than Rototuna. However, the current Plan Change 12 proposals do not include these areas as potential locations for intensification. Same applies to Peacocke and Amberfield.
- 3.2. Therefore, we encourage the Council to review the map taking this into consideration.



Greenfield development

- 3.3. As well as having a plan for intensification, the Council also needs to have a plan for greenfield development. Both are equally important to achieve better outcomes for Hamiltonians. In particular, there need to be options for 'full size' sections and different typologies (for example, sections of 400sqm and 600sqm) to ensure different options are available. Otherwise, there is an increasing risk of 'regional sprawl', whereby people commute to Hamilton for work from Cambridge, Morrinsville, and other towns increasing. Regional sprawl is a greater issue than urban sprawl for a city such as Hamilton, and plans to fast-track more greenfield developments need to be accelerated.

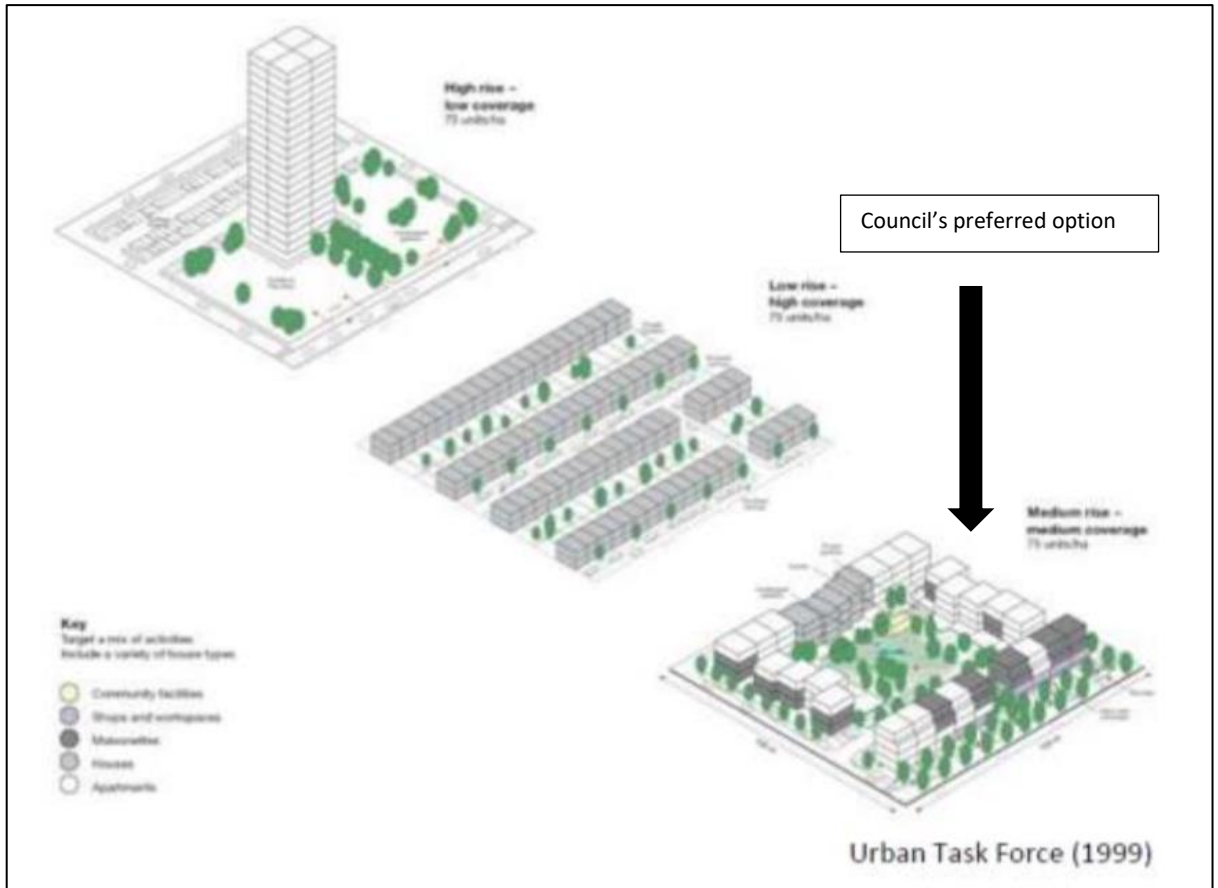
4. Urban design

Perception of mixed use

- 4.1. Density can be enabled in a range of different fashions, including mixed-used developments. We want to emphasise an importance of taking a balanced approach when it comes to mixed-used developments. For example, the assumption should not be made that every commercial building is required to have a café on a ground floor, which sometimes comes through as the 'ideal' sort of mixed-use development. These could include offices, retail, gyms, and other uses. That is, there is a need for some flexibility, and for diversity of thought about what a District Plan should enable.

Role of good design

- 4.2. NPS-UD does not provide a clear description of density. The Council is looking at the mid-rise option for locations outside of the central city area (as shown on the graph below).



- 4.3. We do not disagree with the Council's proposal. However, we believe that this diagram is somewhat 'leading', too simplistic, and that further options should be explored. For example, infill through the city will unlikely be simply one of these three options. Therefore, alternative options and some latitude for intensification will be needed in our view.
- 4.4. This is particularly the case as these options assume large sites, and it is likely that much intensification will take place on smaller sites. For example, Frankton has intensified based (often) on sites of 800-1000sqm being divided into 5-6 units at a time. Property Council favours strong urban design outcomes, and to achieve the preferred option above, it would be desirable to encourage the agglomeration of sites and provide more flexibility about how different sites are developed well.
- 4.5. We also want to emphasize the importance of good design when it comes to intensification. We strongly support good urban design, and want to avoid the risk that overly-prescriptive approaches to design may limit innovation, cause development lag and sometimes have the opposite effect than intended.

- 4.6. Therefore, we recommend the Council take a balanced approach to ensure innovation can occur to reach good design outcomes (with affordable options¹) supported by a practical and time-critical urban design advisory panel.

Intensification and land covenants

- 4.7. There is a problem with a regional sprawl in Hamilton. It is challenging to intensify when land covenants exist. The Council needs to look at different typologies to address the challenges of too few options being available (which may lead to issues of regional sprawl, as outlined above)(e.g. Lockerby Estate at Morrinsville, a 30-minute drive from downtown Hamilton).

Parking requirements

- 4.8. Under the NPS-UD, the Council will no longer be able to require developers to provide car parking through the District Plan in certain areas. Therefore, developers will have a choice as to whether they provide car parking with their development (except for mobility parking).
- 4.9. While we support the market-driven approach, we are concerned that parking in the city is getting strained (e.g. lack of short-term parking options). This will eventually have a significant negative impact on revitalization of the city centre. While the issue might be broader than just a District Plan, we encourage the Council to take this into consideration.

5. Natural environment

- 5.1. The Council is planning to review Significant Natural Areas once further guidance is provided by the Government. While we understand the Council's intention to protect certain natural areas, there is a risk that the ecological value of some parks can be overstated, as some parks are more focused on recreational activities (e.g., we want to protect streams more than playing fields). We encourage the Council to apply a robust methodology when reviewing these areas to enable more opportunities for intensification where appropriate.

6. Culture and heritage

- 6.1. The Council is working on heritage assessment, evaluation of sites and areas of significance to Māori as well as adding archeological sites to the District Plan. While we support the Council's further work around cultural and heritage sites and buildings, there is a risk that heritage can be overstated and used as a proxy for 'conservatism' (i.e. keeping the status quo when it is unnecessary).
- 6.2. Given the above, the Council should take a targeted approach when considering what the heritage is. This will help enable more intensification while making sure appropriate sites and buildings are protected.

¹ Note: good urban design is more than luxury apartments, and is about overall urban form.

7. Pipes and roads

Infrastructure capacity

- 7.1. Work is currently underway to understand the nature, scale and cost of infrastructure needed to support intensification and how the plan will need to provide for strategic infrastructure. We are concerned that the Council does not seem to be placing the same emphasis on infrastructure as they do on new zoning. For example, there is no clarity about the infrastructure plan for Rotokauri. Zoning without provision of supporting infrastructure is not going to work well. The link between the two needs to be clearly stated in Plan Change 12 to ensure successful delivery of intensification.

Walkable catchment

- 7.2. Identification of walkable catchments is integral to the implementation of the intensification provisions in the NPS-UD. We encourage the Council to run specific research to define a walkable catchment in the context of Hamilton.
- 7.3. Based on our initial assessment, there is no single, universal definition of distance for a walkable catchment. A common approach in public transport planning, and one similar to that put forward by the Ministry for the Environment in guidance on the NPS-UD, is to determine and apply a walkable catchment that caters for most people.
- 7.4. When it comes to identifying walkable catchments, consideration needs to be given to modifying factors that may have impact on the distance people can walk (e.g. frequency of service; major walking barriers, such as motorways; as well as factors, such as personal safety and amenity and visual interest of a walking route; access to micromobility options, such as e-scooters and e-bikes).
- 7.5. It is also important to take into account that not everyone will necessarily be taking public transport (e.g. cars are legitimately used for picking children up from schools and tradespeople to get across multiple sites). Some flexibility has to be accounted for.
- 7.6. Further to this, we note that areas served by water transport (e.g. ferries, water taxis) are not included in the requirements under NPS-UD as the frequency and capacity of these services are not sufficient to qualify them as 'rapid transit services'. However, there are guidelines in the NPS-UD that suggest councils might still consider higher densities around settlements served by ferries. We encourage the Council to explore areas potentially served by water taxis to unlock more opportunities for intensification.
- 7.7. Finally, walkable catchments can be very site specific. For example, if a site has good qualities for development with little effects on neighbours, but is outside of Council's walkable catchment, there needs to be an opportunity for review. The Council needs to ensure there is a flexibility in the process to enable more opportunities for good quality intensification.

8. Additional comments

Timeframe

- 8.1. We are concerned with the proposed timeframe as it seems to be too long (see graph below). For example, Waikato District Council has managed to get plan changes to enable new housing areas notified and completed within less than a year. By 2024 (Phase 3 on the graph) it is likely that proposals to replace the Resource Management Act will be in effect. Given the above, we

recommend the Council review the timeframe taking this into consideration and aim to fast-track those parts of Plan Change 12 which will enable the key types of development that the city urgently wants and needs.



9. Conclusion

- 9.1. Property Council would like to thank Hamilton City Council for an early engagement on the Plan Change 12. We are happy to offer our assistance on any matters we have raised above if needed.
- 9.2. For any further queries contact Natalia Tropicova, Senior Advocacy Advisor, via email: natalia@propertynz.co.nz or cell: 021863015.

Yours sincerely,



Brian Squair
Waikato Regional Chair
Property Council New Zealand