

Agenda Development Planning is a new company that is dedicated to bringing forward sustainable forms of both urban and rural land use and development. This submission sets out the key issues identified by **Agenda** as requiring additional measures within the Proposed Regional Policy Statement (PRPS in this submission).

Greater Wellington Regional Council GWC has recognised the importance of the role of compact urban form in supporting sustainable development for many years. The tightly constrained nature of what might be called the core urban areas of Wellington - Wellington city and the two corridors of urban development running to the north of it comprising Lower and Upper Hutt and Porirua cities and Kapiti Coast District - has been long recognised by GWC. This in turn is set out in the PRPS and, to a greater or lesser extent, is recognised also by the territorial authorities in this part of the region. In these physical constraints the region differs markedly from the other larger urban areas of New Zealand. Auckland, Christchurch and Hamilton all have large hinterlands of relatively easily developable land, as have a number of mid-sized cities such as Tauranga, Napier and Hastings. While the importance of promoting more sustainable forms of development is essential to the sustainability of all regions, for the Wellington region's core urban area, the imperative to utilise urban land in the most efficient manner is paramount. To prosper and achieve the aim of a sustainable and competitive region, it is crucial for urban land to be used efficiently. It is not difficult to find examples in the recent development of the area where the opportunities to bring forward this type of development have been missed, and the PRPS notes that there are places where the region's typically compact urban form has started to fracture. The document recognises fully also the importance of a sustainable transport network, and this too is recognised in the planning documents of GWC and its partner Councils. Provision for ensuring the full potential future contribution of sustainable transport networks, both within the region and into those adjoining it, must however in some cases be ensured by

identifying and safeguarding new and/or expanded routes, rather than relying only on existing public transport infrastructure. Failure to provide and plan for alternatives to private transport could lead to future bottlenecks in the development of a sustainable future for the whole region.

It is to these issues concerning urban development and transport / land-use relationships that the majority of this submission is directed. The ways in which our settlement patterns impinge upon natural resources and the natural environment are many, and for the most part these are amply addressed in the PRPS. One other issue is raised here however, and that is the loss of productive soils, which the PRPS recognises must be protected.

This submission suggests for the most part approaches that are in line with the objectives of the PRPS. A number of amendments to policies are also suggested. It is considered that these or very similar provisions are required in order to provide a robust Regional Policy Statement, that will in turn ensure a greater sustainability of urban development within the region through the adoption of these principles in new and revised District Plans.

Throughout this submission, “plans” is intended to denote new and revised statutory plans or parts of plans. In many cases these intersect with work contained in other planning documents such as the Land Transport Strategy.

Promotion of efficient urban land use

Nineteenth and early twentieth century patterns of urban development were possible in New Zealand because of the small size of our then relatively new towns and cities. Urban development in the second half of the twentieth century was to some extent “liberated” from constraints of distance by the growth in car ownership and the accompanying increased provision of roading. This is the pattern that many developers, and indeed planners and engineers,

know and understand, and consequently opportunities to grasp more efficient forms of land use have in some instances been lost. However, the limited availability of urban land in the core urban area is such that it is a potential barrier to the region's competitiveness. In order both to provide for economic well-being and to decrease the impacts of future development, it is vital that the opportunities to provide for more efficient land use patterns are not wasted in the future, as this would otherwise progressively force development onto less accessible land and perpetuate unsustainable patterns of growth. Where land is close to suburban or local centres and / or areas with excellent opportunities for increasing accessibility by non-motorised transport modes, higher densities should therefore not only be encouraged but also required. This does not mean that environmental quality within these areas should be sacrificed however, and good urban design will be crucial to ensuring that high quality places offering great working and living environments are the result.

In line with current thinking, opportunities for mixed-use activities should be incorporated into new development, and redevelopment, at appropriate locations. In this respect, the potential for some existing developed land to be redeveloped more intensively should be reviewed, perhaps on an on-going basis. This could include, for example, identification of areas of industrial employment close to highly accessible transport nodes, which could be developed with a mixture of uses to maintain or perhaps even increase levels of employment, while also introducing an element of residential use. This could include 'live-work' units, but equally separate employment units at ground and perhaps first floor level(s) with residential use above.

Where rural land is being considered for subdivision for urban development purposes, plans should require development proposals to demonstrate that all potential users can access appropriate levels of services locally by means other than private motor vehicle. The effect of this approach is that subdivision should only be approved where good accessibility can be provided, within

ranges that would need to be defined either within the Regional Policy Statement, an update of the Regional Land Transport Strategy, or within District Plans. (The last of these options would however be the least effective of the three.) Further notes on accessibility are contained in the glossary. While the levels defined there are indicative, they based on established good practice at an international level. The suggested levels require further consideration and perhaps adjustment, including for example allowances for the differences in local accessibility that result from topography. However, they have been formulated with reference to existing public transport frequencies, for example 20-minute intervals between passenger trains that have been introduced in parts of the core urban area.

In accordance with the accessibility levels in the 'Definition' section below, sustainable new settlement should provide the following:

- (i) For predominantly residential development and mixed-use development with a strong residential component: Level 2 access to a local centre essential services and shopping and to local recreational opportunities (refer to glossary), and other services at not less than Level 3 accessibility.
- (ii) For predominantly employment development: Level 3 accessibility from areas that provide residential opportunities for prospective employees.

Proposals for urban development within areas of Level 1 accessibility should consist of:

- (i) For predominantly residential development, a mix of walk-up apartments and terrace housing, or apartments only with retail at ground floor level;
- (ii) mixed use development including a significant component of residential use.

Promotion of sustainable transport networks that are well integrated with urban development:

Providing public and non-motorised transport will be a key issue in the planning of new urban development. For all but the smallest developments, which will generally be infilling of or extensions to existing cities, towns and settlements, routes for these sustainable transport modes will need to be planned in from the start. Thresholds need to be considered and established, for example in terms of site area and / or dwelling unit numbers, above which such routes must be safeguarded during the course of development. This protection must also extend to locations where future incremental development will add to the demand created initially by the new development.

Provision should also be made for major new transport stops and interchanges, and opportunities may exist to make such places the foci for local or suburban centres.

In some places, sustainable future transport systems may require that capacity improvements will require route widening. Such routes must also be identified and safeguarded.

Connections to other parts of the country must also be considered, particularly those rail routes where investment has historically been very low. Identification and safeguarding of potential routes including route widening will be a key factor in ensuring that the region remains competitive and well connected to the rest of the country.

Plans should identify and safeguard new and future public transport, cycling and walking routes, stops and interchange sites within urban developments that will be reach or be over appropriate, defined population and / or area thresholds, or that are located in areas where incremental or cumulative future development will or is likely to reach these thresholds.

Plans should identify and safeguard existing public transport, cycling and walking routes where capacity improvements may require additional land take, and shall safeguard such routes.

Plans should identify and safeguard existing regionally and nationally significant public and goods transport routes where land needs to be protected to provide for future capacity improvements, and where appropriate to identify new routes and provide for their protection.

Linking sustainable land development and transport networks:

Except for where such mapping is contained in the Regional Transport Strategy or other relevant regional documents, plans should include a map showing existing and future accessibility in line with the definition in the accompanying glossary by means other than private vehicle. “Future” accessibility shall include a timeframe for delivery and shall factor in only those transport improvements that can be demonstrated by robust and deliverable plans including those covered by existing planning consents.

Linking sustainable urban and rural land uses:

The need to protect the most productive land is recognised in the PRPS. Loss of such land will impede resilience to any future situation that results in any loss of ability to import foodstuffs into the country and / or region, and in order to support the key sustainability criteria set out in the purposes and principles of the Resource Management Act 1991, it is essential that such land be protected on a permanent basis. Any permitted subdivision of such land should be linked to viable land uses that utilise the productive capacity of such land.

Other aspects of new subdivision:

Energy efficiency of residential areas, particularly at lower densities, is partially dependent on good sunlight access. Any new areas being developed

for residential use, should have minimum levels of sunlight exposure. It is suggested that minimum exposure to direct sunlight during daylight hours should be no less than 60% of all daylight hours between the autumn and spring equinoxes.

It is commonplace for new subdivisions to have covenants placed on titles, in many cases limiting development of sections either to single houses or to single houses with one smaller annex. This limits the efficiency of land use in some areas with good access, and plans need to include rules to prevent such non-planning controls from impacting adversely on the efficiency of future urban development patterns.

Agenda Development Planning considers that the following amendments to proposed policies should be incorporated into the Regional Policy Statement:

Policy 6 Change:

“(a)(i) People can travel to, from and around the region efficiently;”

to:

“(a)(i) People can travel to, from and around the region efficiently by a choice of modes including non-motorised and public transport.”

Policy 7 Change:

“protect regionally significant infrastructure” to *“protect existing and planned regionally significant infrastructure”* .

Policy 9 Add:

(c) inefficient land use patterns that lead to (a) and (b).

(This will also result in a small drafting change, by deleting “; and” from (a) and adding it to (c)).

Policy 10 Change:

(a) “promote energy efficient design and the use of small scale renewable...” to “promote energy efficient design *and urban form* and the use of small scale renewable....”

Add:

“(c) Establish minimum sunlight exposure thresholds for new residential subdivision.”

(This will also result in a small drafting change, by deleting “; and” from (a) and adding it to (b)).

Policy 28 Add:

“(c) identify land uses suitable for areas at high risk from natural hazard where opportunities arise to retire such land from more vulnerable uses.”

(This will also result in a small drafting change, by deleting “; and” from (a) and adding it to (b)).

Policy 30 Change:

(c) as drafted to (d), and substitute:

“(c) identify locations where with necessary investment good access to the public transport network can be provided, and prevent inefficient forms of land use in those locations that would be incompatible with the creation of future high density and/or mixed use development; and”

(This will also result in a small drafting change, by deleting “; and” from (b)).

Policy 54 Change:

(c) as drafted to (d), substitute new (c) as below, and amend (d):

(c) “the proposed development incorporates provision for public transport at sufficiently frequent levels of service and non-motorised transport occupants and others using the development will be able to access it by means other than private motorised transport; and

(d) a structure plan that is up-to-date with, or has been updated to reflect, the Regional Policy Statement.

Policy 56 **Add:**

To (e), following “transport network infrastructure”:

“except where provision has been made through identified and confirmed sources of funding, including developer contributions, to pay for such increases in demand and / or upgrades.”

Policy 59 **Add:**

“Plans shall prohibit subdivision for urban development purposes on Class I and II soils, other than where such subdivision relates to provision of essential linear infrastructure (transport routes, power transmission lines, utilities) and that it can be demonstrated that no other possible routes exist that would result in the smaller losses of Class I and II soils.”

Definitions:

Non-motorised modes: Walking; cycling that is not limited to recreational cycling opportunities.

Sheltered and secure passenger shelter: A dry and enclosed public transport passenger shelter that is built to highest standards of security, and has electronically real-time transport information and / or sight lines to arriving services from comfortable seating.

Accessibility:

Accessibility is set out below to generally defined levels. These will however require adjustment to reflect different topographies throughout the region. Accessibility levels defined on maps within statutory plans are often indicated simply by means of a circle drawn around a point such as a railway station or other public transport stop or interchange, or less regular shape drawn around a local or higher order centre. At its simplest, this cannot account for shortest-route walking distances, and ideally they should be adjusted to reflect changes in vertical level along walking and cycling routes. For example, an accessibility map around a local centre on a hillside, with walking routes available both horizontally (more or less) along contour lines and up- and down-hill, should result in the areas of different accessibility being foreshortened across the changes of levels and apparently elongated along routes that follow contour lines, so that in its simplest form a high-accessibility circle would become an oval.

In order to provide an approximation of walking distance as opposed to straight line distances, these have been expressed in the form n1 / n2 metres, e.g: 400 metres straight line distance approximating to maximum 500 metres walking distance.

Topographical adjustments aside, we consider that the following offers reasonable accessibility guidelines:

Level 1:

Maximum of 400 / 500 metres (walking distance) to a suburban centre served by a choice of public transport services.

Level 2:

Maximum of 400 / 500 metres (walking distance) to (i) a local or suburban centre that provides a range of day-to-day needs including: daily shopping needs provided by at least one convenience store, doctors surgery, community

centre, branch library or provision for a mobile library stop and pre-school / childcare facilities, or for future development land set aside as a local centre and with a robust plan in place to ensure that the land is available for such uses, and (ii) a local park with (at least) seating within an attractive landscaped area and a children's play area.

Level 3:

At least one public transport service available from a sheltered and secure passenger shelter within 400 / 500 metres serving a suburban or district centre, at 20 minute intervals or better for a minimum of 12 hours / day and with good levels of coverage for at least another 4 hours a day.

Level 4:

Either of:

(i) At least one public transport service available from a sheltered and secure passenger shelter within 400 / 500 metres serving a suburban or district centre, at minimum hourly intervals or better for a minimum of 12 hours / day and with good levels of coverage for at least another 4 hours a day; or

(ii) Outside the Level 2 area but not more than 1 kilometre from at least one public transport service available from a sheltered and secure passenger shelter serving a suburban or district centre, at minimum 20-minute intervals or better for a minimum of 12 hours / day and with good levels of coverage for at least another 4 hours a day

Level 5:

At least one public transport service available from a sheltered and secure passenger shelter at within 2.5 kilometres of a local centre, that has sufficient provision for both all-day secure cycle and car parking and that serves a suburban or district centre.

Definitions of other levels of lesser accessibility may also be appropriate.