29 September 2022

Hamilton City Council
Hamilton 3240
By email: haveyoursay@hcc.govt.nz

SURVEY AND SPATIAL NEW ZEALAND – WAIKATO BRANCH

Submission on Hamilton City Council District Plan – Plan Change 12

The Waikato Branch of Survey and Spatial New Zealand ("SSNZ") appreciates the opportunity to submit on Hamilton City Council's proposed Plan Change 12. We broadly support HCC's stated intention of facilitating greater housing density in accordance with the National Policy Statement on Urban Development ("NPS-UD") and the Resource Management (Enabling Housing Supply) Amendment Act ("RMA Amendment Act"), while balancing this with the need to protect the natural environment and provide for good quality urban design outcomes.

About Us

SSNZ is the primary professional body representing surveyors within the Waikato. Our members are professionals involved in all aspects of land development, including urban design, resource management, civil engineering and cadastral surveying, as well as spatial disciplines such as GIS and mapping.

Our roles are often unique among property professional disciplines in the way that they span the entire project lifecycle, linking design and planning considerations to the practicalities of infrastructure design/delivery and quasi-legal matters of tenure and land ownership. We apply the provisions of the district plan through preparation of subdivision scheme plans and are well acquainted with how these impact on tangible urban outcomes. We work with and broadly represent the interests of land developers within Hamilton.

SSNZ wishes to be heard in support of our submission.

Alignment with Property Council New Zealand

SSNZ shares an active interest in the property industry with the Property Council New Zealand Central Region ("Property Council"), and is united in their pursuit of a 'well-designed, function and sustainable built environment, in order to contribute to the overall prosperity and well-being of New Zealand.'

Accordingly, SSNZ broadly agrees with, and wishes to lend support to many of the concerns raised by the Property Council within their submission on Plan Change 12. In particular, we wish to support and amplify the following key points raised within their submission:

- Amending proposed six storey maximum to create a varied skyline near the central city (para 4.8).
- Concerns over assumption of adverse effects within policies 4.2.2.2b and 4.3.2.2b and rewording to better reflect the positive impacts of development (para 4.12-4.14).

- Concerns over approach to walkable catchments and recommendation to align with other Tier 1 cities (para 7).
- Concerns over the proposed approach to heritage, character and archaeological sites (para 8).
- Concerns about unintended consequences and lack of clarity surrounding implementation of the proposed infrastructure capacity overlay (para 9). More on this below.
- Recommendation that HCC not adopt the proposed EV charging requirements (para 13.10)
- Concerns about the requirement for Integrated Transport Assessments to consider impact on greenhouse gas emissions (para 13.14).
- Concerns about a tendency toward overly prescriptive planning rules (para 14.1). SSNZ strongly agrees that overly prescriptive planning rules can frequently stifle creative solutions to site specific challenges and ultimately result in lower quality urban design outcomes.
- Support of incentives to encourage comprehensive and integrated developments on larger, amalgamated sites (para 14.2). We strongly agree with this, and add more below.

Infrastructure Capacity Overlay

SSNZ recognizes and appreciates the need for HCC to impose controls on development commensurate with the ability of existing infrastructure to handle that development. We likewise acknowledge that the need for a more complex approach to controlling development on this basis (beyond simple zoning provisions) is a necessary response to the blanket requirements of the RMA Amendment Act.

Nonetheless, we hold serious concerns about the administrative burden imposed by the proposed policy, the extent to which the overlay has been applied across Hamilton and the associated uncertainty that this imposes on prospective developers across the city.

SSNZ understands the development of the corresponding 'Three Waters Connection Policy' is ongoing. The details of this will need to be carefully worked out, and SSNZ wishes to engage further with HCC in the development of this policy and its application through the District Plan.

The key outcomes SSNZ wishes to pursue in the application of this policy are:

1. Maximizing certainty for landowners as to development potential of their land
2. Minimizing administration and timeframes associated with connection applications
3. Minimizing risk of connections approved/constructed for land use but inappropriate for subsequent subdivision and vesting, with associated rework.

Encouraging Comprehensive Development

SSNZ notes the dominance of the duplex typology within Hamilton under the operative district plan, which is an unsurprising outcome arising from the easier consenting pathway currently afforded to this method of development. We note that this typology is frequently over-used, even in greenfield environments where better urban outcomes could be achieved with more varied housing types.

In the same way, SSNZ is concerned that the proposed Plan Change 12 (in alignment with the RMA Amendment Act) will give rise to a dominant 'tri-plex' typology owing, again, to the streamlined (or eliminated) consenting pathway granted by the highly publicized '3x3' land use rules. We anticipate scenarios where developers of large sites will favour development of vacant sites, for subsequent development in groups of 3's, rather than a single integrated development comprising a range of housing styles, densities and holistically designed greenspace.

We recommend that HCC give serious consideration to providing financial incentives for developers willing to undertake the additional design and consenting work associated with delivering higher quality, comprehensive and integrated developments of large and amalgamated sites.

We suggest that this could be achieved by reducing/waiving the financial contribution imposed on such comprehensive developments. This can easily be justified on the basis that these financial contributions are designated, in part, for provision of residential amenity in existing public open space or streetscapes. A discount for developers willing to engage in additional design/consenting process to deliver comprehensively designed urban spaces would recognize that such developers are naturally investing more to provide additional amenity and compensate them appropriately for this.

Subdivision Design Standards

Plan Change 12 reduces the minimum net site area for a vacant lot in the general residential zone from 400m² down to 300m². Nonetheless, it maintains the 15m diameter circle as a minimum shape factor (Rule 23.7.1a) and a 15m minimum transport corridor boundary length (Rule 23.7.3a).

SSNZ supports the reduced net site area, however considers that a 15m frontage and shape factor circle are not appropriate for the density enabled by this rule.

A 300m² rectangular site with the 15m minimum frontage and width prescribed by these rules would require a depth of 20m, resulting in a width to length ratio of 1:1.3. In reality, good quality and functional homes are frequently constructed on narrower lots than this, with width to length ratios ranging from 1:2 (12.2m width for a 300m² site) up to 1:3 (10m width for a 300m² site). Enforcing wider, squarer sections will limit the variation possible in subdivision design and associated housing typology, and will likely lead to poor urban design outcomes.

SSNZ recommends reducing these requirements to a more appropriate width, and consider introducing an alternate rectangular shape factor to provide for a more appropriate range of lot shapes commensurate with the density afforded by 300m² vacant sections.

Summary

SSNZ Recommends that HCC:

- Engage further with SSNZ and the wider development community to further develop district plan rules and policies associated with implementation of the infrastructure capacity overlay;
- Consider providing financial incentives to encourage comprehensive and integrated development of large and amalgamated sites.
- Reduce 15m minimum shape factor circles and frontage criteria for vacant lots in the general residential zone.

Furthermore, SSNZ endorses and supports the following recommendations put forward by the Property Council:

- Amend the proposed High Density Residential Zone to better support developments of six or more storeys;
- Revise their approach to residential policies 4.2.2.2.b and 4.3.2.2b, to better reflect the positive impacts of development;
- Align with other Tier One cities and introduce at least a 1200m walkable catchment around the central city;

- Re-evaluate the proposed approach to heritage, character and archaeological sites; and
- Not adopt the proposed EV charging requirements and instead retain the ability for the market to allocate EV charging capacity as required.

Conclusion

SSNZ thanks Hamilton City Council for the opportunity to submit on Plan Change 12 of the District Plan. Our members actively facilitate development projects across the city, and will maintain an active interest in the further development of this Plan Change. We wish to be heard in support of our submission at a hearing.

Should you have any enquiries in relation to this submission please contact Marcus Brown, Chair, via email: marcus@bluewallace.co.nz or cellphone: 027 703 3643.

Yours Sincerely,

Marcus Brown
SSNZ Waikato Branch Chair