Pragma Property Group Limited

Submission on Plan Change 12 – Enabling Housing (PC12) Hamilton City Council

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Submission Information:

Pragma Property Group Ltd (Pragma) could not gain an advantage in trade competition through this submission.

The specific provisions of the Plan Changes that Pragmas submission relate to are attached.

Pragma opposes/seeks amendment to the specific provisions as listed in the attached document. The reasons are provided in the attached document.

The decisions Pragma wishes Council to make ensure the issues raised by Pragma are dealt with are contained in the attached document.

Pragma reserves the right to be heard in support of this submission.

If others make a similar submission, Pragma will consider presenting a joint case with them at a Hearing.

Regards,

Fraser McNutt

1.0 Introduction

Pragma Property Group Ltd welcomes the opportunity to provide feedback on the Enabling Housing Plan Change (**PC12**) as prepared by Hamilton City Council (**HCC**).

Pragma owns the site at 51A Rifle Range Road which is subject to changes in the Enabling Housing Plan Change (**PC12**) which the following feedback relates to.

Figure 1: Outline of land applicable to Pragmas submission

2.0 General Feedback

Pragma Property Group Ltd are seeking the rezoning of 51A Rifle Range Road to Residential Zone as part of the intensification plan change requirements in PC12 in accordance with Objective 3 and Policy 3 of the NPS-UD.

Pragma appreciates the opportunity to submit on the Enabling Housing Plan Change to ensure future growth and development is enabled within Hamilton City and to support competitive land markets.

Pragma has made specific feedback points as outlined in Section 3.0 to improve PC12, and to efficiently and effectively achieve a more congruous overlook in terms of Hamilton City's urban growth as a whole, including intensifying particular areas of the City where appropriate. Pragma also ensure this submission effectively achieves the proposed objectives of the plan change and the District Plan as a whole, and the purpose of the RMA.

The NPS-UD 2020 requires Councils to plan well for growth and ensure a well-functioning urban environment for all people, communities and future generations. The NPS-UD also provides direction to ensure plans make room for growth both up and out through enabling intensification in appropriate locations – places in or close to urban centres where people can access jobs, services and amenities, places well-served by public transport and other areas with high demand.

The NPS-UD recognised the national significance of:

- Having well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.
- Providing sufficient development capacity to meet the different needs of people and communities

Relevant Objectives are listed below:

Objective 1: *New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural well-being, and for their health and safety, now and into the future.*

Objective 3: Regional policy statements and district plans enable more people to live in, and more businesses and community services to be located in, areas of an urban environment in which one or more of the following apply:

a) The area is in or near a centre zone or other area with many employment opportunities
b) The area is well serviced by existing or planned public transport
c) There is high demand for housing or for business land in the area, relative to other areas within the urban environment

Objective 4: New Zealand's urban environments, including their amenity values, develop and change over time in *response to the diverse and changing needs of people, communities and future generations*

Objective 6: *Local authority decisions on urban development that affect urban environments are:*

a) Integrated with infrastructure planning and funding decisions; and
b) Strategic over the medium term and long term; and
c) Responsive, particularly in relation to proposals that would supply significant development capacity

Relevant Policies are listed below:

Policy 1: *Planning decisions contribute to well-functioning urban environments, which are urban environments that, as a minimum:*

a) Have or enable a variety of homes that:
  i. ***Meet the needs, in terms of type, price, and location, of different households;*** *and*
  ii. Enable Māori to express their cultural traditions and norms; and
b) Have or enable a variety of sites that are suitable for different business sectors in terms of location and site size; and
c) ***Have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport****; and*
d) Support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and
e) Support reductions in greenhouse gas emissions; and
f) Are resilient to the likely current and future effects of climate change.

Policy 3: In relation to tier 1 urban environments, regional policy statements and district plans enable:

a) In city centre zones, building heights and density of urban form to realise as much development capacity as possible, to maximise benefits of intensification; and
b) In metropolitan centre zones, building heights and density of urban forms to reflect demand for housing and business use in those locations, and in all cases building heights of at least 6 storeys; and
c) Building heights of at least 6 storeys within at least a walkable catchment of the following:
  i. Existing and planned rapid transit stops
  ii. The edge of city centre zones
  iii. The edge of metropolitan centre zones; and
d) Within and adjacent to neighbourhood centre zones, local centre zones, and town centre zones (or equivalent), building heights and densities of urban form commensurate with the level of commercial activity and community services.

Policy 6: When making planning decisions that affect urban environments, decision-makers have particular regard to the following matters:

a) The planned urban built form anticipated by those RMA planning documents that have given effect to this National Policy Statement
b) That the planned urban built form in those RMA planning documents may involve significant changes to an area, and those changes:
  i. May detract from amenity values appreciated by some people but improve amenity values appreciated by other people, communities, and future generations, including by providing increased and varied housing densities and types; and
  ii. Are not, of themselves, an adverse effect
c) The benefits of urban development that are consistent with well-functioning urban environments (as described in Policy 1)
d) Any relevant contribution that will be made to meeting the requirements of this National Policy Statement to provide or realise development capacity
e) The likely current future effects of climate change

It is proposed to enable this site to be used for residential purposes through rezoning to residential, giving effect to the NPS-UD by supporting the urbanisation and intensification of a site which has high accessibility to open space, schools, commercial centres and is well served by public transport. The site is well suited to delivering the wider outcome of well-functioning urban environments and suitable for enabling intensification. It delivers the requirements for areas to be intensified under Objective 3 and Policy 3 of the NPS-UD for the following reasons:

- The site is located near public transport opportunities which travel frequently to and from the CBD, Chartwell and The Base Te Awa – Frankton, Dinsdale and Orbiter bus routes within 500m walking distance of the site;
- The site is within a walkable catchment of the following community facilities/services;
  - St Columbus Primary School – 70m north;
  - Frankton Primary School – 220m south;
  - Swarbrick Park – 90m south;
  - Railway Park – 220m east;
  - Early Childhood Centre – 400m south-east;
  - Places of Worship (Reformed Church of Hamilton) – 240m south-east;

  - Police Station – 500m north;
  - Dinsdale Shopping Centre (supermarket, Dinsdale Library, retail, restaurants) – 800m south
- The site is surrounded by General Residential (towards the west); Special Heritage Zone (towards the east); Open Space Zones (towards the south and east); Community Facilities Zone (towards the north and west); Industrial Zone (towards the north) and a Business 6 Zone (towards the west);
- The site is within close proximity to the above-mentioned facilities/services; thus, it is our professional opinion that there is a high demand for additional housing capacity.

While the site is currently zoned Open Space Zone, it does not resemble that of a standard Open Space Zone, due to the 100% impermeability and the nature of consented activities able to be undertaken onsite. Enabling the site for residential use is in direct corelation to *'Subpart 7, 3.37 Monitoring development outcomes'* as the site is consented for residential development to occur and is a more efficient use of land than the current landuse. Currently, the site, as Open Space Zone, is not being utilised by the public (for decades) as 'Open Space Zone' and is essentially redundant in terms of being able to be used for genuine open space. Enabling the site to be used for residential purposes as a general residential zone (as per the notified Gen Res PC12 provisions) will allow for additional development capacity. It is anticipated that the site could assist with delivering circa 25 additional units' additional capacity (through what is consented and what could be reasonably realised) through supporting increased densities within an area that is surrounded by existing General Residential Zoning and highly accessible to a range of community activities and commercial services which is anticipated through the NPS-UD and therefore would be in alignment with the direction of Objective 3 and Policy 3.

The purpose of PC12 is to make changes which *"will provide for more housing, and higher density housing, across the city"*, as required by Central Government and to give effect to the NPS-UD. As such, it is our opinion that this submission is within the scope of the Plan Change, as it will allow intensified residential use on a site which has high accessibility to public transport, the CBD and other employment opportunities.

3.0 Submission on the Enabling Housing Plan Change (PC12)

Sub #	Topic	Support/Oppose/ Seek Amendment	Comments/Reasons	Relief Sought
1	District Plan Zoning – Sports & Recreation Open Space Zone	Seek amendment/Oppose	The NPS-UD provides a unique opportunity to enable intensified residential development on sites like this that have lost their original zone integrity over time, to maximise development opportunities and support competitive land markets in location within or close to centres, have high accessibility or high demand. This particular site has already partially been consented and developed for residential use (northern part – refer to Appendix A). This has now occurred for the balance of the site (refer below). Enabling residential use onsite would be consistent with the intensification policy direction in the NPS-UD, providing the wider community with a diverse range of housing, catering towards the needs of current and future generations, recognising that these needs will continue to change and develop over time. Due to the consented development on the site and the current state of the site, it is evident that the site does not exhibit typical character of an Open Space Zone. Thus, while enabling residential use/development through appropriate residential zoning would technically result in a loss of Open Space Zoned land, it would not reduce the amount of land available for public use. Further, there are numerous parks and reserves within the surrounding and wider environment to fulfil the needs of the community. The site has high accessibility to various community facilities (schools, Elliot Park, Dinsdale library), local business centres (Dinsdale Shopping Centre),	We seek to rezone the site/Open Space/51A Rifle Range Road to General Residential Zone to enable residential development (as already partially consented) through PC12.

			employment opportunities within the CBD and is well served by public transport. The site meets the requirements in Objective 3 and Policy 3 of the NPS-UD for areas that Council is required to enable intensification and therefore apply suitable zoning through PC12. Specifically, the site is within a walkable catchment of the City Centre and several neighbourhood/suburban business centres. The site also has high accessibility by active and public transport to various community facilities/services and commercial activities – Schools, early childhood centres, Parks/Open Spaces, employment opportunities within the CBD, supermarkets, Dinsdale Library, Places of Worship and Dinsdale Shopping Centre. Refer to section 2.0 above, for the specific walking distance to the above facilities and services. In addition, the site is well served by regular public transport opportunities. This demonstrates that the site is suitable for enabling intensification and clearly meets the requirements for areas that must be enabled for intensification under the NPS-UD. The site is occupied by a double-storied building (previously occupied by the Frankton Bowling Club), which is in the process of being demolished (refer to images in Appendix A) and is 100% impermeable. The site is consented to accommodate a predominantly residential development, consisting of a 24-unit Managed Care Facility, with café (refer to Appendix B). The adjoining site towards the north at 6 Moa Crescent is also zoned as Sports & Recreation Open Space and accommodates a Managed Care Facility, established in 2019 which, for the same reasons, would benefit from having the open space zone removed and replaced with enabling more appropriate residential use. Enabling residential use on the site is a more efficient use of land and would give effect to the NPS-UD (as mentioned above), allowing for development to occur at a scale which is suitable to the site and	

			provides for the needs of communities. Enabling residential use would provide additional development capacity onsite in an area which is well served by public transport and is within close proximity to several community facilities (as mentioned above).	