To: **Hamilton City Council**
260 Anglesea Street, Council Building, Hamilton 3240

Regarding: **Plan Change 12**

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We do not wish to be heard in support of our submission
We do not gain an advantage in trade competition through this submission

This submission is made in response to the Hamilton City Council's proposed changes to the District Plan as set out in Plan Change 12.

We understand that the proposed changes to the District Plan set out in Plan Change 12 (PC12) are in response to the Government's National Policy Statement on Urban Development (NPS-UD), which requires city councils to allow more intensive housing development to take place without requiring a resource consent. We recognise the benefits that can result from higher housing density, including reducing urban sprawl and providing more housing and greater choice of types of housing. But critically, increasing housing density must be done well if these and other potential benefits are to follow.

Developers need to work as part of a team that includes relevant expertise. For example, experts such as arborists, landscapers and experts in urban design. As part of this exercise, the Council needs to recognise that focusing on increasing housing density alone is unlikely to achieve successful urban communities and neighbourhoods. The Architectural Designers Board New Zealand endorses this view in Julianne Ross's article *High Density Housing Has its Place:*

> "Ultimately, we need to endeavour to understand the complete life cycle of the development and what is required from the design, materials, location and everything in between to guarantee success. This means architects, architectural designers and developers need to consider a multitude of factors. They need to find out what is happening in the broader community, details of local shops, cafes, transport links and the location of health/community and educational facilities. They must also consider how to ensure there is a mix of users. For denser housing to work well, it needs to be home to young families, professionals and retirees and there needs to be different housing types to cater for individual and group needs. This will enhance the community, decrease isolation and increase neighbourhood satisfaction."
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> High Density Housing Has its Place; Julianne Ross, March 12, 2020.
> https://www.stuff.co.nz/life-style/homed/residential/120061792/high-density-housing-has-its-place

We are concerned that PC12 doesn't include aspects that will result in successful urban communities. Our chief concerns are around:

- ensuring sufficient space for outdoor living
- potential loss of light, sun and privacy for neighbours
- maintaining tree canopy and sufficient green space
- ensuring the capacity of three waters infrastructure is sufficient to service the increased number of households
- the need for measures to ensure that roads and footpaths are suitable and safe for use by pedestrians, cyclists, mobility vehicles, cars, vans, trucks, buses etc.
- ensuring that public transport meets the needs of the community in terms of frequency, shelter, affordability, safety.

Neighbourhoods and types of Housing

Although PC12 has some provisions that may go toward mitigating adverse impacts in new developments and suburbs, there is nothing to address the potential harm that can arise from intensification in existing suburbs, even though the Council recognises that development in accordance with the proposed changes "*will have adverse effects, in some instances substantial, on existing development and neighbours" (PC12: 4.1.1)*.

We want the Council to consider the changes as part of the effects on the community as a whole and amend the requirements for permitted activities to ensure that the living environment for residents is enhanced rather than worsened to shabby, less desirable environments with diminished tree canopy and green spaces, footpaths blocked by vehicles, and inadequate infrastructure capacity. The Salvation Army's report "State of Our Communities 2022" illustrates how important it is for councils to ensure that public transport, adequate infrastructure, including roads and footpaths safe for all users, parking spaces and adequate storm- and waste water must also be provided alongside higher density housing.

Allowing three units of 3- or 5-stories on a 650m^2 section poses a risk to healthy urban living in that it further restricts the space for outdoor living. Such spaces are required for gardens, children to play at home, people to sit outside with some privacy, and outdoor areas for pets. These spaces are also required for clotheslines and storage of our large rubbish bins.

Even when parks/recreation areas are within walking distance, people have busy lives and can't be at the park all the time, so having enough outdoor space at home is important. Everyone needs their own space such as being able to sit outside their own home, in their own time in good weather. This is also relevant as more people are working from home these days.

These dwellings will look over and into their neighbours' properties, and potentially reduce light, sun, and privacy. An increase in the number of people means increased noise and hence increased stress. We want the Council to ensure that building materials and design are required to mitigate high noise levels.

We want the Council to push back against the NPS-UD policy to remove any requirement for car parks. Car parks are essential to prevent people from parking on the berms and even footpaths. This is a practice that is becoming more and more prevalent already and constitutes a potential hazard to pedestrians, especially those with disabilities, walking aids, prams and children on scooters and bikes. A reduction in car use in favour of other modes of transport will only happen over some years

and with accompanying changes most importantly efficient public transport, after which car parks can be then used to increase outdoor living space, which can only be good.

Furthermore, all new dwellings need their own garage that is separate from their outdoor living space. Even if they don't own a car, everyone needs space for safe storage of bikes, prams, scooters. Provision for charging stations for e-cars and e-bikes, mobility scooters is also required.

Green policies

How will developers be encouraged to retain existing trees? They don't do it now so how will this be changed? Mature trees have taken years to get this big and can't be replaced in the short term by new plantings or by smaller vegetation. Mature trees are good for the environment and good for people. They provide shade and a sense of shape and form, giving balance to the built environment. They attract bees and birds, providing food and homes for birds, including native birds. Trees improve air quality by absorbing CO_2 and emitting O_2 and often sweeten the air with perfumes.

We want the Council to include rules that protect existing trees so that developers are not removing them just for the sake of convenience or unsubstantiated concerns about them falling over.

Infrastructure: Stormwater, Wastewater, Drinking water

The Council's assessment of the three waters current infrastructure capacity demonstrates that there is "*insufficient infrastructure capacity (trunk and local networks) across much of the city to meet current demands, let alone additional demands that may be generated by the required NPS-UD or MDRS amendments"* (Appendix 3.5).

The Council proposes to address this through "a three waters infrastructure capacity overlay … which would require infrastructure capacity assessments for housing developments of a medium to high density..." (Appendix 2.5). PC12 does have requirements for new developments around landscaping, permeable surfaces and rainwater tanks. However, PC12 has no requirements for developers to include work on infrastructure to account for the increased load unless the proposed development is non-complying. This is extremely concerning in that it potentially results in a significantly increased burden on existing infrastructure, which is likely to be already insufficient to cope with demand.

We want the Council to commit to investment in three waters infrastructure to ensure that capacity is sufficient for both existing suburbs and new developments, given that this is not provided for in PC12.

Thank you for your consideration of our views

Signed: Margaret Mcleod