

Proposed National Policy Statement on Urban Development Capacity

Submission

1. The Proposed NPS should not only require Local Authorities to provide adequate urban development capacity but should also require that they do so in a way that creates, and maintains, quality living environments.
2. This should extend to a requirement to minimise adverse effects on existing amenity and character.
3. As drafted there is insufficient support for quality and character in both the objectives and policies.
4. The emphasis placed on terminology such as “efficiency”, “effective”, “commercially feasible”, “intensification strategy”, and similar wording may in fact be interpreted as a signal that quality and character are acceptable causalities of intensification and development. If that is the intent it is misguided.
5. The NPS includes requirements for Local Authorities to consult with infrastructure and various commercial parties (for instance in PB4) but not with the wider community.
6. Consultation with the community is a fundamental principle of local government and good planning processes. There should be a clear requirement in the NPS for Local Authorities to consult with the community as part of its regular assessment of development capacity requirements and for the outcome of that consultation to be reflected in the strategy developed.
7. Changes are required to ensure a proper balance is obtained between quality, character and economic / commercial considerations.
8. Changes are also required to incorporate community consultation into the requirements
9. The full redrafting required is beyond the scope of this submission but may include changes along the following lines;

Objective OA1

“Effective, efficient and ***quality*** urban areas that provide for social economic, cultural and environmental wellbeing.”

PA1 first bullet point - “pursue an urban form that seeks to maximise the potential for social and economic exchange **within quality living environments.**”

PA1 add new bullet point – “**seek to minimise adverse effects on existing amenity and character**”

PD4 add to the end “... **but always having regard to the requirement to create and maintain quality living environments.**”

PB6 add a new policy “**Local Authorities must consult with the general community and take into account their views when preparing the Regional and District urban development capacity strategy**”

10. Also, Policy PD4 as worded would likely lead to a very short term approach to development capacity based on intensification. It may be that a longer term strategy would seek to shift the demand away from areas of current focus to suit a longer term vision of community development, for instance, into new satellite centres with their own employment and support structures. Some further amendments are necessary to broaden the scope and application of this policy.
11. The above give an indication of the type of changes required to improve the balance in the document but are by no means exhaustive.
12. The NPS is a high level document that sits above District and Regional Plans.
13. It is therefore important that it is not formatted in way that allows Local Authorities to ride roughshod over communities.
14. For example, in the manner that Auckland Council did during the Unitary Plan hearings.
15. In that case Auckland Council endeavoured to introduce a raft of intensification measures without consultation and with little regard to the impact on existing amenity and character.
16. This was rejected by an outraged community and Council forced to withdraw the proposed changes.

17. There should be a lesson in this for legislators preparing this NPS.
18. That is - communities do expect planning processes to provide reasonable protection for existing amenity and character, they want quality solutions, and they do expect to be provided with an opportunity for meaningful consultation.
19. In my view the NPS as currently proposed falls short on all of these points.

Note: Please withhold my name and contact details from publication or release.

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