Planning for successful cities - a proposed National Policy Statement on Urban Development

Submission Reference no: 138

Southern DHB

Submitter Type: Other
Source: Web Form
Overall Position: Support in part

Clause
Question 1. Do you support a national policy statement on urban development that aims to deliver quality urban environments and make room for growth? Why/Why not?

Position
Yes

Notes
It is our opinion that this document gives some direction for Councils to follow; it enables them to make changes to current plans and strategies that will allow for future growth, within the constraints of the infrastructure available.

Clause
Are there other tools under the RMA, other legislation or non-statutory tools that would be more effective in achieving a quality urban environment and making room for growth?

Notes
There is the opportunity to set national plans for density levels in inner city housing areas for more populated main centres. It would be better to keep this with the Councils who know their areas and the amenity that they wish to have/aspire to.

Clause
Question 2. Do you support the approach of targeting the most directive policies to our largest and fastest growing urban environments? Why/why not?

Position
Yes

Notes
The creation of new Future Development Policy and Plans for major urban centres (MUC) is appropriate. We question why centres such as Dunedin (which has moderate (Table 3 uses different language) growth, was excluded from this list). We support the inclusion of Queenstown Lakes as a MUC even though it has a lower population than many of the cities that are no longer identified as MUCs.

Clause
Do you support the approach used to determine which local authorities are categorised as major urban centres? Why/why not?

Notes
No. Larger main centres (identified in Table 3) with modest growth should not voluntarily comply with this Policy Statement as MfE propose. Dunedin struggles to maintain sufficient housing for its growth and ensure infrastructure (water/sewerage) capable of meeting demands in growth. Satellite developments outside of the ring-fenced network is not favoured by Public Health even though developers advocate it given the aforementioned infrastructure constraints. Southern DHB recommends that Dunedin should be required to develop a Future Development Strategy.

Clause
Can you suggest any alternative approaches for targeting the policies in the NPS-UD?

Notes
Southern DHB recommends that Dunedin should be required to develop a Future Development Strategy and other medium-
growth cities should be treated the same way.

**Clause**

**Question 3.** Do you support the proposed changes to FDSs overall? If not, what would you suggest doing differently?

**Position**

Yes

**Notes**

There should be a requirement that all main centres should provide future development strategies for the planned changes. Growth rates can change over the life of plans and they should include the ability to plan for active transport and public transport systems. Limiting car parking would be only one way to encourage further inner development.

**Clause**

Do you support the approach of only requiring major urban centres to undertake an FDS? Would there be benefits of requiring other local authorities to undertake a strategic planning process?

**Notes**

No. Councils identified in Table 3 would benefit from being required to complete these processes; a staged approach could be considered.

**Clause**

What impact will the proposed timing of the FDS have on statutory and other planning processes? In what ways could the timing be improved?

**Notes**

As noted, these plans need to be drafted prior to LTP so they can inform their content. They should mandate master planning processes to create a framework for Private Plan Changes to operate within. The master planning process needs to be flexible enough to take into account future population demands.

**Clause**

**Question 4.** Do you support the proposed approach of the NPS-UD providing national level direction about the features of a quality urban environment? Why/why not?

**Position**

Yes

**Notes**

Southern DHB has no issues with being more directive, although we believe Councils will be more familiar with the actual amenity and city/urban culture they are wishing to create (e.g. heritage precincts).

**Clause**

Do you support the features of a quality urban environment stated in draft objective O2? Why/why not? (see discussion document, page 26)

**Notes**

Yes. These statements support a public health approach to planning and we welcome “well-being” being re-incorporated back into council mandate.

**Clause**

What impacts do you think the draft objectives O2-O3 and policies P2A-P2B will have on decision-making (see discussion document, page 26)?

**Notes**

The impact of these objectives would be minimised if councils are encouraged and supported to embrace a Health in All Policies approach to their planning. Public Health South seeks to strengthen opportunities for earlier engagement within the Southern district.

**Clause**

**Question 5.** Do you support the inclusion of proposals to clarify that amenity values are diverse and change over time? Why/why not?

**Position**

Yes

**Notes**

Amenity values may well be compromised as cities grow upwards. This trade-off will evolve as the population begins living closer to where it needs to be.

**Clause**

Do you think these proposals will help to address the use of amenity to protect the status quo?

**Notes**

No comment.
Can you identify any negative consequences that might result from the proposed objective and policies on amenity?

Notes
No comment.

Can you suggest alternative ways to address urban amenity through a national policy statement?

Notes
No comment.

Question 6. Do you support the addition of direction to provide development capacity that is both feasible and likely to be taken up? Will this result in development opportunities that more accurately reflect demand? Why/why not? (see questions A1 - A5 at the end of the form for more questions on policies for Housing and Business Development Capacity Assessments)

Position
Yes

Notes
We agree that the direction should only be aimed at centres where the capacity created is likely to be taken up. However, current housing pressures can change lower growth areas especially those that are adjacent to current higher growth areas (Central Otago adjacent to Queenstown Lakes would be a good example).

Question 7. Do you support proposals requiring objectives, policies, rules, and assessment criteria to enable the development anticipated by the zone description? Why/why not?

Position
Yes

Notes
We like the proposed process to be followed when Council’s Housing and Business Development Capacity Assessments are unable to meet bottom-line demands.

Do you think requiring zone descriptions in district plans will be useful in planning documents for articulating what outcomes communities can expect for their urban environment? Why/why not?

Notes
No comment.

Do you think that amenity values should be articulated in this zone description? Why/why not?

Notes
No comment.

Question 8. Do you support policies to enable intensification in the locations where its benefits can best be achieved? Why/why not? (for more detail on the timing for these policies see discussion document, page 53)

Position
Yes

Notes
We support the mandating of intensification based on where the population work. Such policy goes on to mandate reduced vehicle use, active transport, and opens up opportunities (e.g. reticulated heat in centres that are prone to air pollution).

What impact will these policies have on achieving higher densities in urban environments?

Notes
Prior to any planned intensification, appropriate infrastructure needs to be operational.

What option/s do you prefer for prescribing locations for intensification in major urban centres? Why?

Position
Option 2 (the prescriptive approach)

Notes
Option 1 is perceived to be a reserved approach. We would prefer to delay intensification until appropriate infrastructure was in
Clause
If a prescriptive requirement is used, how should the density requirement be stated? Please provide a suggestion below (for example, 80 dwellings per hectare, or a minimum floor area per hectare).

Notes
A planning tool/matrix should be developed and each council should be able to use this as a guide subject to the level of existing infrastructure and the timeframe required to meet the intended density level.

Clause
What impact will directly inserting the policy to support intensification in particular locations through consenting decisions have?

Notes
Consents are recommended to be delayed until appropriate infrastructure is in place.

Clause
Question 9. Do you support inclusion of a policy providing for plan changes for out of sequence greenfield development and/or greenfield development in locations not currently identified for development?

Position
Somewhat

Notes
We would not be against greenfield development per se, but would expect to see connection to existing infrastructure or development of new infrastructure with a pathway to seeing it operated and eventually owned by a Public Authority such as a Council. We have had experience of managing disease outbreaks where privately provided and operated infrastructure of this type has failed.

Clause
How could the example policy better enable quality urban development in greenfield areas (see discussion document, page 37)?

Notes
Provided it is clear on how public infrastructure such as water, sewage, public/active transport options, parks and playgrounds will be provided and eventually vested in public ownership, are articulated in the planning.

Clause
Are the criteria sufficiently robust to manage environmental effects to ensure a quality urban environment, while providing for this type of development? (see example policy in discussion document, page 37)

Notes
We believe the criteria are sufficiently robust.

Clause
To what extent should developers be required to meet the costs of development, including the costs of infrastructure and wider impacts on network infrastructure, and environmental and social costs (recognising that these are likely to be passed on to future homeowners/beneficiaries of the development)? What impacts will this have on the uptake of development opportunities?

Notes
The majority of costs should be covered by the developers, and this should include sufficient and adequate development contributions where there is an impact on an existing infrastructure. For new greenfields development we would see the up-front capital costs to be met almost entirely by the developers.

Clause
What improvements could be made to this policy to make development more responsive to demand in suitable locations beyond areas already identified for urban development?

Notes
Policy needs to be responsive to demand but only insofar as the infrastructure can keep up. Our experience in the Queenstown-Lakes district in particular has seen Special Housing areas gazetted at a faster rate than the water, sewage and transport infrastructure can keep up with.

Clause
Question 10. Do you support limiting the ability for local authorities in major urban centres to regulate the number of car parks required for development? Why/why not?

Position
Yes

Notes
Limiting carparks is supported as infrastructure to provide cheap user-friendly public transport or active transport options are
Clause
Which proposed option could best contribute to achieving quality urban environments?

Position
Option 3: removing the ability for local authorities to set minimum car park requirements in areas providing for more intensive development.

Notes

Clause
What would be the impact of removing car park minimums in just high- and medium-density, commercial, residential and mixed use areas, compared with all areas of a major urban centre?

Notes
Provided it is done in a way that facilitates people using active or public transport options. In our view making the healthy choice should be the easy choice.

Clause
How would the 18 month implementation timeframe impact on your planning processes?

Notes
Southern DHB requests that Queenstown be brought forward into the first round rather than the priority it is currently situated in. It faces pressures from special housing areas and multiple large subdivisions being approved without timely and appropriate infrastructure in place to meet a growing population. This has placed undue pressure on existing infrastructure and halting this exponential growth would significantly benefit the environment.

Clause
What support should be considered to assist local authorities when removing the requirement to provide car parking to ensure the ongoing management of car parking resources?

Notes
Infrastructure to promote cheap user-friendly public transport and active transport options would be required in advance of this change.

Clause
Question 11. Do you think that central government should consider more directive intervention in local authority plans?

Notes
No comment.

Clause
Which rules (or types of rules) are unnecessarily constraining urban development?

Notes
We support the three examples provided on page 45 (1. minimum lots sizes in particular zones; 2. height to boundary rules in high-density zones; 3. the ability to set minimum house or apartment sizes).

Clause
Can you identify provisions that are enabling higher density urban development in local authority plans that could be provided for either nationally or in particular zones or areas?

Notes
Existing policies which have been shown to be effective should be promoted to councils for them to adopt if they deem this is appropriate for their area (for example the three examples shown on page 44 of the discussion document). The 2nd Generation Dunedin City Plan enables “granny flat” accommodation to be established in most residential zones.

Clause
Should a minimum level of development for an individual site be provided across urban areas (for example, making up to three storeys of development a permitted activity across all residential zones)?

Notes
No comment.

Clause
Given the potential interactions with the range of rules that may exist within any given zone, how could the intent of more directive approaches be achieved?

Notes
No comment.
Clause
Question 12. Do you support requirements for all urban environments to assess demand and supply of development capacity, and monitor a range of market indicators? Why/why not?
Position
Yes
Notes
These details will promote transparency. Council would benefit from national templates being provided to them which ensures standardisation of this data so it is comparable across the country and minimises any additional workload.

Clause
Question 13. Do you support inclusion of policies to improve how local government works with iwi, hapū and whānau to reflect their values and interests in urban planning? Why/why not?
Position
Yes
Notes
Mandating engagement with iwi, hapū and whānau is important and in particular they may well have requirements that need to be enabled through planning (for example papakāinga housing).

Clause
Do you think the proposals are an appropriate way to ensure urban development occurs in a way that takes into account iwi and hapū concerns?
Notes
Yes.

Clause
How do you think local authorities should be directed to engage with Māori who do not hold mana whenua over the urban environment they are currently living in?
Notes
No comment.

Clause
What impacts do you think the proposed NPS will have on iwi, hapū and Māori?
Notes
There will no doubt be a wide variance in experience and existing resources which (where needed) may need to be increased to fulfil the proposed engagement by Councils with Maori.

Clause
Question 14. Do you support amendments to existing NPS-UDC 2016 policies to include working with providers of development and other infrastructure, and local authorities cooperating to work with iwi/hapū?
Position
Yes
Notes
The consultation document however does not explicitly identify that the health sector needs to be engaged with. We believe this is an oversight and needs to be mandated into the coordinated planning objectives/policies. In our view ‘Health’ should be involved in all aspects of planning as part of a Health in All Policies (HiAP) approach.

Clause
Question 15. What impact will the proposed timing for implementation of policies have?
Notes
Southern DHB welcomes these proposals commencing. As stated in question 10, we recommend that the timing for Queenstown is brought forward to 2024.

Clause
Question 16. What kind of guidance or support do you think would help with the successful implementation of the proposed NPS-UD?
Notes
We understand that the intent is for the Ministry of Health to work with MfE in developing a guidance document to discuss public health in urban development. There could be more detail put into the NPS detailing what guidance and support needs to happen to support the planning function at the regional and local level. This is discussed on page 56 under “Guidance and Implementation Support”.

Clause
Question 17. Do you think there are potential areas of tension or confusion between any of these proposals and other national direction? If so, please identify these areas below and include any suggestions you have for addressing these issues.

Position  Yes
Notes  The relationship between urban development and the other key areas also being consulted on by MfE is crucial. From a public health perspective, we see the development of the Wastewater NES as a key proposal which needs prioritised. Urban developments should not be approved without the appropriate infrastructure in place. However we know urban waste water quality is varied across the country. Similarly the relationship with air quality is important from a public health perspective.

Clause  Question 18. Do you think a national planning standard is needed to support the consistent implementation of proposals in this document? If so, please state which specific provisions you think could be delivered effectively using a national planning standard?

Position  Yes
Notes  Trained MfE staff should be allocated across the six local government zones to provide localised training and on-going support.

Clause  Question A1. Do you support the changes to the HBA policies overall? Are there specific proposals you do or do not support? What changes would you suggest?

Notes  No comment.

Clause  Question A2. What do you anticipate the impact of the proposed polices (and any related changes) would be on planning and urban outcomes?

Notes  No comment.

Clause  Question A3. Are the margins proposed in policies AP3 and AP12 appropriate, if not, what should you base alternative margins on? (for example, using different margins based on higher or lower rural-urban price differentials)

Notes  No comment.

Clause  Question A4. How could these policies place a greater emphasis on ensuring enough development capacity at affordable prices?

Notes  No comment.

Clause  Question A5. Do you support the approach of targeting the HBA requirements only to major urban centres? Why/why not?

Position  No
Notes  Larger main centres (identified in Table 3) with modest growth should also be required to demonstrate that their planning is sound (i.e. in conjunction with Public Health); this should not be undertaken voluntarily as MfE propose.