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

Submission Reference no: 190

Timaru District Council

Submitter Type: City/district council
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
Council generally support the proposed National Policy Statement on Urban Development (NPS-UD) that aims to deliver a quality environment and cater for future growth. This will enable better planning, particularly for infrastructure which is often the constraining factor, and the one that adds considerable cost to the development. A NPS-UD alone will not achieve the outcomes sought in regard to affordable housing and central government needs to support Local Authorities in the development of lead infrastructure. Currently, particularly in transport, lead infrastructure is generally not financially assisted by the government agency, (New Zealand Transport Agency) and priorities are focussed on current needs only. Under pressure to meet future growth demand, local authorities are also challenged with meeting community affordability expectations.

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
The increasing centralisation of businesses and government agencies to major urban centres has resulted in there being surplus capacity for growth in provincial cities. Centralisation can often reduce financial costs for individual businesses, but this can be at the expense of provincial communities, with the loss of social capital needed to ensure long term community sustainability. Government could look to encourage the use of the available capacity of provincial areas, using existing land, housing and infrastructure which may alleviate the pressures of managing growth in major urban areas.

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
Council supports the approach of targeting the major growth areas for the most directive policies. These are the areas with the greatest needs. One concern is that the focus on major growth areas may be at the expense of low growth areas, as nationally contestable funding is prioritised to these high growth areas. This risks a spiralling trend of low growth areas becoming less sustainable and attractive, driving more migration to major urban centres. The Government must look to counteract this trend through more focused policies for provincial growth.

Clause
Question 3. Do you support the proposed changes to FDSs overall? If not, what would you suggest doing differently?
Position
Yes
Council generally supports the proposed Future Direction Strategies (FDS) as an improvement in the alignment between land-use change and infrastructure and believe this will result in more efficient future development.

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?

There would be benefit in requiring other local authorities, outside the major urban centres, to develop FDS. All local authorities should be aspiring to future growth however the challenge for authorities outside of major urban centres is often how to attract or encourage growth rather than providing for growth. While Council agrees in principle that a strategic planning process, such as the FDS, is certainly best practice for all local authorities, we also recognise the capacity and resourcing challenges this would burden smaller councils with.

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

Infrastructure Strategies (IS), Asset Management Plans (AMP) and Long Term Plans (LTP) all include the provision for providing infrastructure to meet growth. The development of another statutory strategy may not be the most efficient or effective mechanism and Council suggests that the Infrastructure Strategy (IS) requirements be extended to include the outcomes sought in the FDS. Including specific growth provisions in the IS will create better alignment with funding mechanism, including identification of funding gaps. It is the funding gaps that may impede the future development in many areas. With the inclusion of FDS principles, the IS will allow council’s to balance infrastructure spend for the provision of growth with other funding demands, such as maintaining the level of service required by the community through the LTP and the responsible stewardship of community assets through the AMP. It would be interesting to know the Ministry’s view on balancing these community needs whilst maintaining affordability.

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?

Council recognises and supports the aspirational nature of the NPS – UD and the national direction. We believe that to improve the effectiveness of the policies and objectives the term ‘quality’ needs to be more clearly defined to provide direction for the term’s application throughout the NPS. Council believes that provision of broad well-being objectives in Objective O2 conflicts with direction to minimise negative impacts in Objective O3. To avoid this conflict hampering decision-making processes, we recommend the NPS include guidance for how such conflicts can be resolved. We also seek direction on what constitutes a “positive contribution” and “negative impacts” as referred to in Objective O3.

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

Council agrees that clarification of amenity values and widening the scope has merit but this may result in unintended negative impacts by opening land-use consents up to greater challenge and slowing the availability of land for future development.

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)

The determination of development capacity that is both feasible and likely to be taken up is generally supported by Council. We seek clarity on the definition of ‘feasible’ and what requirements there are to achieve a nationally consistent view on this. In provincial areas land is often developed in a non-structured manner based on land ownership and financial capacity of private land owners and local authorities may not have the means to control development in a structured manner. We note that Policy P4A requires this development capacity to be diverse for both housing, in terms of typology and price, and business, in terms of location, floor area and extent of land. With the requirement to fund the development infrastructure for the development capacity this diversity may stretch some local authorities funding ability to unsustainable levels. It is noted that where a local authority cannot enable feasible development capacity, because of limited infrastructure funding and cannot meet the requirements under NPS-UD, the Minister for the Environment must be notified and discussions initiated with government on
how to address the gap. Council seeks clarity on the intent of this policy, whether this notification will result in financial assistance for local authorities, and whether other polices, such as the Government Policy Statement on Transport will be amended to also provide such assistance.

Clause
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
Somewhat
Notes
We have noted that there is an inconsistency between the detail of Objective O6 as detailed on page 34 of the discussion document, where this objective applies to all urban environments, and Table 1 on page 10, that states that this objective applies only to major urban centres.

Clause
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
Council supports the view of promoting higher density housing where benefits are realised. We believe that quantifying the benefits to be achieved is an area where more guidance is required for the NPS.

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
No
Notes
Council does not support the inclusion of a policy providing for plan changes for greenfield developments in locations not currently identified for development. It is our view that this proposal will undermine the ability of the FDS to sustainably manage urban growth in a coordinated and comprehensive manner. For example, the Timaru District Growth Management Strategy seeks urban consolidation. If the NPS were to require us to allow all greenfield development, our Growth Management Strategy would be undermined. Further: • The proposed requirement to prepare a Future Direction Strategy (FDS) or similar is a long term strategy and should identify all areas for potential development. • The discussion document is promoting higher density developments to meet growth more efficiently that utilises existing infrastructure capacity and creates critical mass for further efficiencies such as public transport. Out of sequence or unplanned greenfield developments are contrary to this. • The initial cost of infrastructure relating to greenfield developments is a small component of the overall lifecycle cost of these assets. Additional infrastructure adds operating and maintenance costs for Councils and the assets must be depreciated for future renewals. Out of sequence or unplanned greenfields infrastructure will increase the Council’s operating and maintenance expenditure that will impact Long Term Plan’s and affordability.

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
No
Notes
We do not support the policy of limiting the ability for local authorities to regulate the number of car parks required for development. This is contrary to the proposed policy O2 in providing quality environments that meets peoples and business demands. Local authorities have the discretion to minimise parking requirements now and these are applied based on communities differing needs and demands.

Clause
Question 11. Do you think that central government should consider more directive intervention in local authority plans?
Notes
The Government already has the ability to make targeted National Policy Statements, National Planning Standards, regulations, special housing areas or urban development authorities. Providing national rules on density could have significant adverse effects on infrastructure, environmental values, and the ability of local authorities to strategically plan for growth using FDS.

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
Somewhat
Council supports, in part, the proposed requirements to assess demand and supply of development capacity and monitor a range of market indicators. Evidence based decision making is essential. However, it is noted that the focus of the policy P8D is around housing affordability. The evidence requirements do not seem to extend the consideration of other well-being factors noted in Appendix 3 (for example, congestion, poor transport choice and urban pollution). The limited focus on housing affordability will not necessarily achieve medium or long term efficient and effective growth provision, providing high quality environments and efficient land, energy and infrastructure use, as aspired to in proposed NPS-UD Objective O2.

**Notes**

The inclusion of iwi in decision-making is required in the Resource Management Act, Local Government Act and Land Transport Management Act, all of which the provision of planning for future growth is included. Council believes existing requirements are sufficient.

**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**

Somewhat

**Notes**

The benefits of coordinated and collaborative planning are without question and are supported by Council. Successful land development requires infrastructure from developers, local authorities and utilities providers. It should be noted that coordination between local authorities and utility providers is currently required under the Utilities Access Act 2010. Additional policies included in the draft NPS-UD should reference this legislation. Not all developers and infrastructure providers are guided by principles of community well-being or the provision of affordable housing. Some utilities operate in a competitive commercial environment and drivers are based on commercial market and business objectives. This makes coordination challenging in the development of infrastructure, particularly the provision of lead infrastructure to service future demand.

**Clause**

Question 15. What impact will the proposed timing for implementation of policies have?

**Notes**

The fundamental impact on local authorities with the proposed timing for implementation of policies in the Draft NPS-UD will be the provision of adequate resources, people, time and funding. Although Timaru District is not a major urban centre, there are still many requirements of the proposed NPS-UD to be met in a timely manner. Another challenge is the alignment of all other local authority plans and strategies, both local and regional, and the timing of revision and development of these will challenge implementation.

**Clause**

Question 16. What kind of guidance or support do you think would help with the successful implementation of the proposed NPS-UD?

**Notes**

With adequate resources being our most significant risk to achieving the implementation of the proposed NPS-UD, any assistance in this area through financial contribution, external resource assistance and training would be welcome. We suggest that the Ministry coordinate workshops to upskill local authority staff and share ideas to achieve both efficiency and effectiveness, particularly in providing nationally consistent guidance. This has been recently done successfully through the Road Efficiency Group initiated by Government.