10 October 2019

National Policy Statement on Urban Development
Ministry for the Environment
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To whom it may concern,

Submission on the National Policy Statement on Urban Development Consultation

Thank you for the opportunity to submit. Hawke’s Bay DHB are committed to working collaboratively with local authorities and government agencies to support the social, health and wellbeing outcomes for the Hawke’s Bay community. Urban development impacts our community and has the potential to improve our wellbeing. Well planned urban spaces have the potential to support the environment, productivity and wellbeing for Hawke’s Bay.

We have responded to the discussion document below following the document format and structured questions.

Overview of the National Policy Statement

Targeting cities that benefit most

Scale of the city is not the only determining factor needing to be planned for:

- Non-population growth pressures on accommodation, amenities and infrastructure. Hawke’s Bay, Bay of Plenty and Nelson/Marlborough need to look at seasonal demand due to horticultural workforce and tourist numbers
- Fast growing regions are not always the largest population. For example, Northland is the fastest growing region and has high deprivation issues
- Demand resulting from changing population structure i.e. needs of our aging population returning to regional areas
- Responding to environmental hazards and climate change i.e. rising sea level changes
- Consider cultural needs including family composition i.e. multi-generational households, higher than average number of children, whangai children and housing design to meet Māori, Pasifika and Asian cultural needs
- Meeting the needs of complex communities and supporting community engagement

Planning is critical to enable healthy living environments for future generations. All regions will benefit from planning linked to national policy and strategies including supporting sustainability and environmental protection. The regional plan will combine this with responding to their unique features influencing urban development.

Q1 Do you support a National Policy Statement on Urban Design that aims to deliver quality urban environments and plan for growth?

Yes – we support a National Policy Statement with the following considerations:

- The content and direction needs to consider the Health Act due to the recognized effects of intensification on social health and wellbeing
• Implications for wellbeing resulting from urban design i.e. intensification of accommodation must be a key consideration
• Recognition that intensified upward development does not need to come at the expense of minimum apartment/dwelling floor areas. Cramped spaces do not support healthy populations. Future planning regulations can set minimum floor areas and still enable intensification through vertical development
• Reflect the need to respond to cultural diversity throughout
• Treaty of Waitangi obligations are clearly identified and seen as an opportunity to deliver quality and plan for future demand

Q2 Do you support the approach of targeting the most directive policies to our largest and fastest growing urban areas? No
• Quality urban design and planning for growth are not only influenced by population size/growth issues - all urban areas have unique issues to be planned for i.e. changes in population structure, environmental change, seasonal workforce, tourism, land use, and social deprivation
• Medium-sized and smaller urban centers are less likely to have access to urban design professionals. The application of national policies will support best practice where design professionals are not involved in the design process
• Hawke’s Bay has multiple urban centers, manages a seasonal workforce, tourist pressures on infrastructure, environmental hazards to manage i.e. rising ocean levels, earthquakes. Each urban area needs to identify their strengths and issues, then plan accordingly. Having wider coverage of “directive policies” will help manage these challenges and support consistency across urban centers.

Future Development Strategy
Q3 – Do you support the proposed changes to FDS overall?
Yes – we support the FDS approach in general and note some issues to be overcome:
• There are capacity and capability issues for smaller councils, particularly with the number of planning, policy and strategic documents they are already required to produce
• Infrastructure needs to be defined – it is not just transport networks. Needs to include; health services, internet access, cultural spaces, power, education, amenities and most importantly recognise and financially support community/social housing as a path towards home ownership
• There is potential to build on regional joint working group partnerships between Local and Regional Authorities and Central Government Agencies, such as the DHB, to support a regional planning approach i.e. Matariki (Hawke’s Bay Regional Joint Working Group)
• Essential that all planning around infrastructure is linked including; transport, water, waste, health, IT, education and power
• Inclusion of Iwi and Hapū in the planning process is essential and should be wider than responding to “issues” and include aspirations, kaitiaki roles and being responsive to Māori development

Making Room to Grow
Describing quality urban environments
Q4 – Do you support the proposed approach of the NPS-UD providing national level direction about the features of a quality urban environment?
Yes – we support if the following is further developed:
• Must include a cultural dimension to be responsive to Māori and our growing cultural diversity
• Clear balance of key influences - wellbeing, Treaty, national directions and growth
• Who and how a quality urban environment is defined
• Principles protecting future generations are consider in planning, i.e. intensified health vertical spaces
• Repurposing of existing infrastructure i.e. buildings, brown spaces and green space are all considered. Need to be responsive to changing needs i.e. reduction in manufacturing, provide spaces the can be repurposed or brown space for redevelopment

Amenity values in urban environments
Q5 – Do you support the inclusion of proposal to clarify that amenity values are diverse and change over time?
Yes - we support clarifying amenity, meeting the need for change overtime and:
• Amenity needs to be defined – does it include Marae, multi-purpose spaces?
• Community space must be resilient to meet multiple need i.e. emergency response, events, support wellbeing
• We suggest amenities be defined by the communities and genuinely reflect their aspirations and needs

**Enabling opportunities for development**

**Q6 – Do you support the addition of direction to provide development capacity that is both feasible and likely to taken up?**

**Yes** - we support the direction to provide additional capacity providing the following be considered:
• Need to be future focused rather than responding to current demand
• Social housing be deemed critical infrastructure and as such be financed and planned
• Must link to sustainability i.e. Sustainable Development Goals 8 and 10
• **Sufficient** needs clarity
• Consider there are some environments that are not able to grow any further without causing damage or undermining existing and future needs i.e. historic suburbs in Napier are part of the art deco attraction – intensification may damage that opportunity

**Ensuring plan content providers for expected level of development**

**Q7 Do you support proposals requiring objective, policies, rules and assessment criteria to enable the development anticipated by the zone description?**

**No** - we believe this is already covered in TLA District Plans.
There is opportunity to standardise definitions for activity and zones. This will provide consistency for those engaging with councils.

**Providing for intensification**

**Q8 Do you support policies to enable intensification in the locations where its benefit can best be achieved?**

**Yes** – with the following limitations fully considered:
• Intensification does not necessarily address affordability. Banks will not lend on properties under 45 square meters which suggests investors only would be able to purchase small floor space properties. Supporting ownership across a range of age and socioeconomic groups is required.
• Small spaces are not suited to larger families and multi-generational households. There needs to be a solution which encourages cultural diversity
• Wellbeing in high density living must be considered i.e. minimum floor space, impact of sound, shape, access to green space and recreation facilities. Wellbeing frameworks clear identify the need for social connection, access to nature and support for identity

**Providing for greenfield development**

**Q9 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?**

**Yes** - we support policy changes for out of sequence greenfield development when:
• The conflict between greenfield development and productive lands is addressed
• Clear process will support future generations, such as the Singapore Housing model
• Costs are covered - if for profit, then full cost to developer - if social housing or joint venture (with Council, government or Iwi), then shared cost
• Brownfield and redevelopment is fully considered, urban sprawl and associated pressure for infrastructure and wellbeing are managed
• A portion of greenfield development is allocated to social and affordable housing development i.e. inclusionary zoning and community housing schemes

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1 Major Banks (ANZ, BNZ and Westpac) terms and conditions for
2 Mason Drury, Mental Health Foundation and others outlines these frameworks.
Removing minimum car parking requirements
Q10 Do you support limiting the ability for local authorities in major urban centre to regulate the number of car parks required for development?
Yes and there needs to be consideration of the following
• The major urban centres do not all have significant accommodation close to employment i.e. inner city living, comprehensive public transport, so not able benefit from this change.
• For those centers currently able benefit from reduced vehicle use there needs to significant development of transport alternatives to reduce the need for and level of car ownership.

More direct intervention to enable quality urban development
Q11 Do you think that central government should consider more directive intervention in local authority plans?
Yes by ensuring the following:
• Standardise plan rules, zone description and definitions
• Clear understanding the cost of development and ability for developers to respond
• Ensuring the wider sectors are aligned i.e. banks will not lend on small residential units (currently under 45 square metres) thereby ownership is largely in the hands of investors and those with equity or cash to buy
• Considers the wellbeing and health implications – shading, lack of connection with nature and safety all impact negatively on wellbeing. There must be a balance with liveability for everyone
• As part of completing these Plans, a rule, policy and plan review should be completed to ensure all outcomes are complementary
• This approach allows for culturally diverse needs
• There needs to be balance with wellbeing needs i.e. include recreational spaces, shared living spaces, private space, green space, cultural spaces in all design and development
• Consistency of application of considerations/ areas related to quality urban development need to be maintained, especially in lower socio-economic areas

There is an overall issue for alignment between national and local rules, policy and plans.

Evidence of good decision-making
Q12 Do you support requirements for all urban environments to assess demand and supply of development capacity and monitoring of market indicators?
No - being market led has resulted in the current housing situation. Indicators must be developed to ensure social, wellbeing and housing needs are well planned for including:
• Indicators incorporating the complexity of housing need in urban areas
• Monitoring needs including wider measures i.e. social housing register, migrations, population growth and structure, housing types and infrastructure development
• Wider categories including sustainability, wellbeing and environmental impact
• Need to be responsive and future focused in meeting the needs of those living and doing business in urban areas now and for future generations

Engagement of urban planning
Taking into account issues of concern to iwi and hapū
Q13 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?
Yes - councils need to be work with Māori - iwi and Hapū
• “Issues” are only part of the Māori Crown relationship. There needs to be a focus on Māori aspirations, meeting cultural needs and addressing inequity
• Māori zones can provide some protection for cultural sites and activities. These need to be included as critical amenity
• Include wider Māori agencies and groups - i.e. Marae leadership, TPK or Māori Health Unit (DHB)
Coordinating planning
Q14 Do you support amendments to existing NPA-UDC 20116 policies to include working with providers of development and other infrastructure and local authorities cooperating to work with iwi and hapū?
Yes - we support cooperation.
- It is vital to engage Iwi and hapū in all planning processes
- DHBs be included as an infrastructure provider to ensure coverage for health needs and deliver a public health response for the population
- Include providers of development and infrastructure in the planning process – there is value in bringing together businesses to identify mutual needs and understand system level impact. This could change the adversarial engagement with regulation and move to working with the system
- P10A and P10C – recommend remove “strongly encourage” and replace with “required”

Alignment with other national direction under the RMA
Q17 Do you think there are potential areas of tension or confusion between any of these proposal and other national direction? Yes
- There is conflict with government goals for sustainability, reducing carbon emissions, managing climate change, health and wellbeing
- Need to address inequity in our communities, before that of the global community, i.e. “cutting off your nose in spite of your face”.
- T High level recognition that the aspiration to protect and enhance the global environment may come at the expense, in the short term, of our vulnerable communities
- Here are competing interests around infrastructure including; commercial needs, desire to expand communities and requirement to protect productive soils and natural environments
- There are a number of national policy statements, strategies, policies and plans intersecting with this Statement including soil, water, health and wellbeing

Q18 Do you think a national planning standard is needed to support the consistent implementation of proposals in this document?
Yes – because national consistency will support wider government directions including sustainability, environmental improvement, land use and wellbeing. National standards will support consistent interpretation of the National Policy Statement.

Policies on Housing and Business Development Capacity Assessments
We see a place for government and local government involvement in the facilitating and resourcing of non-commercial development of housing. To ensure that social housing needs is met, wellbeing is planned for and future need is considered. These considerations need to be consistently applied in urban development especially where these developments are taking in areas of potential future high deprivation, or in areas adjacent to high deprivation areas.

Thank you for the opportunity to submit on the discussion document for the proposed National Policy Statement on Urban Development.

Yours sincerely

Health Improvement & Equity