SUBMISSION ON THE PROPOSED NATIONAL POLICY STATEMENT ON URBAN DEVELOPMENT

Introduction

1. Please find attached the submission of Dunedin City Council with respect to the proposed National Policy Statement for Urban Development released by the Ministry for the Environment in August 2019.

2. The Dunedin City Council (DCC) commends the Ministry for the Environment on the development of the proposed National Policy Statement for Urban Development (NPS-UD) and appreciates the opportunity to provide feedback.

3. This submission outlines Dunedin’s recent growth and the measures being implemented to address this and provides feedback and recommendations in relation to specific questions raised in the discussion document.

DCC and housing capacity

4. Dunedin is currently classed as a medium growth urban area under the National Policy Statement for Urban Development Capacity. Dunedin City district is estimated to have a population of 130,700, with annual increases of between 1,200 and 1,900 (1.0 - 1.5%) over the last three years.

5. The Proposed Second Generation Dunedin City District Plan (2GP) was notified on 26 September 2015. Decisions on the 2GP were notified on 7 November 2018. The plan is currently in the appeals phase.
6. A Housing and Business Capacity Report completed in January 2019 identified a shortfall in housing capacity of approximately 1,000 residential units in the medium term and 4,500 in the long term, and a shortage of smaller housing typologies.

7. In addition, a report by the Mayor’s Taskforce on Housing identified a shortage of social housing and affordable housing.

8. In response to these issues, Variation 2 to the 2GP was initiated on 12 February 2019. The variation may include identifying new greenfield areas for residential zoning, allowing more housing in existing residential areas, and/or changing rules and performance standards to encourage, or increase the feasibility of, residential development.

9. It is expected that Variation 2 will be notified in approximately April 2020.

Key points

10. The key points that the Dunedin City Council would like to emphasise are:

    10.1. The DCC strongly supports the increased emphasis on spatial planning, noting that the DCC chose to undertake a Spatial Plan (adopted September 2012) under the Local Government Act prior to notifying its full plan review in November 2015.

    10.2. The DCC also strongly supports the linking of urban growth/spatial planning and infrastructure planning that is encouraged by the NPS-UD.

    10.3. The DCC supports national direction around providing for housing capacity. It notes it is already taking proactive steps, as well as steps required by the NPS-UDC, to ensure it is responding to changes in growth pressures in Dunedin in recent years.

    10.4. The DCC supports the concept that providing for housing capacity should result in quality environments, noting that improvements to the concept of quality environments, as articulated in Objective O2, are suggested. These include the need to include the following aspects of quality environments at the city-scale in the objective:

        - Housing with good accessibility to a variety of transport modes (avoidance of car-dependency)
        - Enabling a variety of dwelling types to meet the needs of different households
        - Promoting good urban design principles (such as those included in the New Zealand Urban Design Protocol).
        - That the expectations around quality environments should be articulated through proactive spatial planning.

    10.5. Dunedin considers itself to be a ‘major urban centre’ and finds its exclusion from the list of major urban centres sends the wrong message about the importance of good spatial planning for Dunedin. However, it understands that the rationale for the list of ‘major urban centres’ is those that are considered to be ‘high growth’ as opposed to medium growth.
10.6. The DCC considers that the removal of specific provisions for ‘medium growth’ urban areas in the NPS, with a focus on only high growth cities, has both advantages and disadvantages. However, on balance, the DCC would prefer that the NPS provides more guidance for medium growth urban areas (as distinct from low growth urban areas).

10.7. It also considers that the major urban centres terminology, insofar as it is used to describe the list of high growth cities, should be changed to ‘high growth urban environments’ to avoid the confusion that is created by excluding major centres like Dunedin that do not meet the cut-off for high growth.

10.8. The DCC specifically requests that the following policies, subject to amendments suggested further in the submission, should apply to Dunedin and other ‘medium growth urban environments’:

<table>
<thead>
<tr>
<th>Policy</th>
<th>Content</th>
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</thead>
<tbody>
<tr>
<td>P1A – P1I</td>
<td>Future Development Strategy (FDS)</td>
</tr>
<tr>
<td>P5A - P5C</td>
<td>Zone descriptions and assessment of effectiveness of provisions</td>
</tr>
<tr>
<td>P5D</td>
<td>Cost benefit analysis of plan changes to ensure quality urban environments and sufficient capacity</td>
</tr>
<tr>
<td>AP1 – AP17</td>
<td>Housing and business capacity assessment</td>
</tr>
</tbody>
</table>

10.9. In addition to these general points, responses to the questions in the Discussion Document are provided in the attached Appendix (Appendix 1).

Conclusion

10.10. The DCC is committed to ensuring Dunedin has sufficient housing capacity and quality urban environments to meet its needs into the future and looks forward to working with central government and other local authorities on the implementation of the National Policy Statement for Urban Development.

Yours sincerely

Dave Cull
Mayor of Dunedin

Attachment: Appendix 1: DUNEDIN CITY COUNCIL SUBMISSION IN DETAIL ON THE NPS-UD
Appendix 1: Dunedin City Council Submission in detail on the NPS-UD
(Specific comments based on discussion document questions)

Note: questions have been grouped and numbered in the order they appear in the discussion document. The answers provided contain key points that the DCC wishes to make on the topic or proposed policy. Alternative drafting options will be relayed directly by DCC staff to MfE.

General comment:
The usability of the document would be improved by making the numbering of objectives and associated policies the same.

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?

Yes. An NPS is an appropriate approach and in general the current NPS-UDC has proved useful in raising broader awareness of the need for forward planning for growth and providing a robust approach to assess capacity.

However, it is important the objective, policy and definition wording is carefully considered to achieve the desired outcomes and the DCC has a number of areas for suggested improvements. If the wording is not modified it could lead to poor planning outcomes that do not result in quality environments or efficient provision of rate-payer funded infrastructure.

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

Partial support, subject to the following comments. The DCC acknowledges the explanation that the NPS-UD “shifts the focus to larger cities and urban centres where the national impact of housing challenges is greatest”. In the consultation meetings, these areas were further described as the high growth urban areas.

The DCC requests that the name is changed to ‘high growth urban environment’ to reflect this. The DCC further requests that the category of ‘medium growth urban environment’ be added, similar to the NPS-UDC, and that Dunedin is classified as such.

If this is done, the DCC suggests that a number of the policies proposed to apply only to MUCs should also apply to medium growth urban environments. This would assist those areas to effectively and efficiently provide sufficient housing and business land capacity and planned infrastructure. The relevant policies are listed in Table 1:

Table 1: Policies which should apply to medium growth urban areas

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Related to the above point, and particularly important if the suggestion of adding in medium growth urban environments is not adopted, is the need to clarify the status of policies where implemented on a voluntary basis.

The document is not clear on how the policies are intended to apply in practice where policies are implemented on a voluntary (versus mandatory) basis. Because the language used in the policies refers to ‘local authorities’ it is hoped that the policies when implemented on a voluntary basis should have the same statutory weight, e.g. if a Future Development Strategy is undertaken on a voluntary basis it would be given the same weight. Including in the NPS-UD clear direction that encourages ‘all other urban environments’ to implement the non-mandatory MUC policies to the degree necessary to appropriately manage growth, as well as direction that, where implemented, they have equal weight, would assist in this regard.

3. **Do you support the proposed change to future development strategies (FDSs) overall? If not, what would you suggest doing differently?**

The DCC agrees that FDS are a useful tool to managing future growth and supports the promotion of better spatial planning. The DCC is planning to undertake an FDS irrespective of not being classified a major urban centre. It is our view that the requirement to complete one should apply to medium growth urban environments. If this is not accepted, the policy should be worded such that all urban areas are encouraged to implement it, and where they do, it has the same legal weight as for major urban centres.

A three year review cycle is appropriate, matching the frequency of the housing and business capacity assessments and the Long Term Plan cycle.

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?**

Yes, subject to the comments below. A broader consideration of the quality of the environment to be created is a desirable counterbalance to the requirement for increased development capacity. However, the DCC does not support the proposed policy wording. The draft policies are worded generally and do not give clear direction about how the objectives will be achieved, especially in relation to Objective O3.

The DCC supports providing better direction on what is meant by quality urban environments. It does not support the suggested approach of that explanation being provided in the preamble, which the discussion document acknowledges would have no legal weight. It suggests that the minimum considerations that should be assessed in considering how to create quality urban environments through spatial planning should be included in a policy under Objective O2, with objectives O2 and O3 wording having a high level focus on the 4 well-beings.

In addition to the aspects that are highlighted in the current list under O2 and those in the discussion document background, critical aspects should include:

- promoting good urban design principles
- providing a variety of dwelling types that respond to forecasted needs
Clause (c) should be clarified that it refers to development infrastructure and other infrastructure.

Staff will provide more detailed drafting suggestions to support this point.

The DCC further considers that Policy P2A(b) is unrelated to quality environments and lessens control of urban development. If this policy is retained it should sit under Objective O5.

The aspects of policies P2A and P2B that relate to consent applications appear to open the door to urban development that is not provided for in the plan, which could set an undesirable precedent. These policies should be removed or clarified. This is discussed further under question 9 below.

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

Yes. The intention to provide for change in amenity values over time and recognise the wider meaning of ‘amenity values’ (for example encompassing places for recreation and cultural activity) is desirable to facilitate urban evolution. However, this could be more strongly provided for in the provisions and should recognise that changes to amenity values should be positive overall. The language used in Objective O4 does not articulate this well at present and seems to confuse:

1. how the amenity values of different urban environments may evolve as those environments change (e.g. a change in values associated with a large area for private recreation space to less private recreation space but more high quality public spaces).
2. How what people value / consider to be high amenity may change over their lifetimes or between generations.

Both of these concepts are important and need to be distinctly conveyed.

Objective O4 also needs to explicitly tie to the concept of enabling quality urban environments outlined in Objective O2.

Policy P3A could be strengthened by requiring decision-makers to:

- consider social and physical infrastructure as part of the overall assessment of amenity values and that ‘loss’ in one area may be offset by ‘gain’ in another;
- explicitly provide for amenity values to change, as long as overall change is positive (considering all aspects of amenity), rather than just ‘recognise’ that amenity values change over time; and
- consider the effect maintenance of existing amenity values has on the ability for future communities, including lower socio-economic groups, Māori and ethnic minorities, to provide for their well-being.

Staff will provide more detailed drafting suggestions to support this point.

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 opportunity that more accurately reflect demand? Why/why not?**
The explicit requirement to consider take up in Policy P4A is supported and should result in development opportunity that more accurately reflects demand. This also allows for better infrastructure planning, as the capacity can be matched to expected take up. However, the phrasing of Policy P4A could be improved. It must also be recognised that local authorities cannot control provision of all infrastructure and policy wording should reflect this.

In addition, it should be recognised that local authorities are often constrained in their ability to service sites with development infrastructure, as required by the NPS. Government assistance to resolve these issues would be of benefit.

Staff will provide more detailed drafting suggestions to support this point.

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

The DCC supports Policy P5A’s requirement to include zone descriptions, noting that these are already included in the DCC’s 2GP. However, it questions what is meant by “[including expected levels of amenity]” as many aspects of amenity are not controlled by plans, for example landscaping and house design, provision of recreation spaces etc. Rather, the plan only seeks to manage some aspects of amenity (for example sunlight access) so any description would be limited.

The DCC notes that the discussion document says, “zone descriptions should be consistent with the National Planning Standards”. The DCC maintains strong reservations about the National Planning Standards and considers, based on its experience, that these standards will work against the provision of quality environments that provide for a range of house types as they seem to give preference for ‘cookie-cutter’ zones that do not provide for social and housing diversity that is necessary for supporting social well-being. DCC considers that housing capacity is better provided through carefully considered structure plans that enable housing diversity and do not neatly fit into any of the generic zone types. While structure plan areas may be possible under the template the means of achieving them seems to result in overly complex plan provisions. The DCC strongly encourages the reconsideration of the National Planning Standards through the proposed RMA reforms.

The DCC supports P5C and considers that monitoring is essential to assess the effectiveness of zone provisions.

The DCC supports Objective O6 in so far as it supports evidence-based decision-making. However, urban development, and particularly zoning, decisions should be guided by a clear set of strategic objectives and policies that should be included in plans. They should not just be made on a case-by-case basis. Having a clear set of strategic objectives and policies that set out the rationale/criteria for each type of urban zone (as has been included in the 2GP strategic directions) enables consultation on how zones should be applied to be undertaken at the time of plan development. This should help to avoid lengthy community debates and appeals at the time of site rezoning (NIMBYism) where sites meet the criteria that have been determined through a public process.
To facilitate the above, it is suggested a clause be added to Objective 06 which says: ‘d. have a clear strategic framework to guide the application of zoning to ensure urban development objectives can be realised’.

Policy PSD is good practice and should also apply to medium growth urban environments.

8. **Do you support policies to enable intensification in the locations where its benefits can best be achieved? Why/why not?**

Yes, subject to the comments below. The 2GP already provides for higher density development close to the CBD and centres. The policy will also support future plan changes for intensification in such areas. However, the requirement to meet only one of the criteria in P6A (a) to (d) should be amended such that both (b) and (d) should be met as a minimum. The following wording should also be added: “As required to meet housing capacity targets through intensification.”

It is also noted that infrastructure constraints may prevent desired densities being available.

The DCC agrees that intensification can have a number of benefits and where there are growth pressures, it must be part of a package of means of increasing housing capacity. However, it can also have costs to individuals and communities and they need to be fairly considered and weighed. The wording of Objective 7 and policies P6A, P6B seem to have excluded the need to consider costs, which are also required to be considered under s32 of the Act.

It is necessary to clarify / define the term ‘higher density development’. Two alternative terms are also used in options for Policy P6C – ‘higher density residential activities’ and ‘high density residential activities’, with different definitions. The use of multiple terms is problematic.

The DCC is neutral about a requirement under Policy P6B for a regional policy ensuring efficient use of land and infrastructure, noting it only applies for major urban centres. However, the policy should refer to ‘in appropriate locations’ as intensification may not be appropriate everywhere. Preferably, this policy should be tied to the criteria in Policy P6A.

The DCC notes that P6C only applies to the high growth centres and supports that approach. It notes that the 2GP includes medium growth areas near centres and in some locations near frequent public transport. It acknowledges the policy is based on international best practice. However, if the policy were to apply to medium growth centres, the descriptive approach is preferred over the directive approach as it gives more local flexibility over the appropriate density and where it is best located. The use of the word ‘suitable’ is, however, likely to result in appeals and will need to be clarified through future case law.

The DCC considers that the language in Option 2 is far too directive and seems to bypass the reasonable and necessary requirements of s32 for analysis of the appropriateness of zoning. Some areas may be unsuitable for intensification, for example heritage areas. In addition, local infrastructure constraints may prevent the specified density being achieved within the timeframe specified. The policy would be improved by requiring a review of appropriate locations that meet the stated criteria and that sufficient higher density areas are provided. Furthermore, density in Dunedin’s medium density zones is managed on a habitable room basis, rather than units per hectare, so a limit based on that metric would also be needed as an alternative.
Policy P6D is not supported in its current form, noting it only applies to the high growth “major urban centres”. The purpose of the policy is not clear and its ‘procedural’ nature would not fit in many plans.

As worded, P6D(b) does not make sense as arguably any over-dense activity could say it was providing more choice of housing, and it is not clear how the answer to P6D(a) should affect the decision. The policy should potentially be rephrased and combined into Policy 6A to direct plan content (such as by saying “Territorial authorities must include in their district plans a policy that sets out clear criteria for where higher-density residential activity should be enabled and which includes, at a minimum, the following criteria.” (a-d in Policy P6A). Including a policy like this can both direct Council-initiated and private plan changes. However, intensification, to be successful, often requires other complementary changes, such as improvements to public amenities, changes to transportation networks to facilitate changes to parking demands and traffic movement, as well as changes to 3 waters infrastructure to facility increased demand. It is the view of the DCC that these changes are best addressed through a plan change process and preferably through a council-initiated plan change or future development strategy.

Staff will provide more detailed drafting suggestions to support this point.

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?**

No. As worded, this policy has the potential to allow un-coordinated development wherever a developer wishes (subject to meeting the criteria), which would be contrary to good spatial planning principles, the efficient and cost-effective provision of infrastructure and the compact city approach promoted in Dunedin. The policy is not limited to future urban areas identified in the plan. The criteria outlined do not fully encapsulate all relevant considerations. It is also not clear if the infrastructure referred to is network infrastructure, or local developer-provided infrastructure. The latter could undermine the efficient provision or public infrastructure and if provided on a permanent basis could lead to significant environmental effects over time unless there is better regulation and monitoring around the long term maintenance of on-site systems.

Drafting changes are necessary to tighten the criteria. Inclusion of a definition for quality environment (see earlier response) would also improve the policy.

If the policy is retained, it should be limited to areas already identified in the plan or future development strategy as suitable for future urban development.

Staff will provide more detailed drafting suggestions to support this point.

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?**

The DCC does not support the application of this policy to medium growth urban environments. In principle, the DCC acknowledges that minimum on-site car parking can reduce the land available for development and minimums should not be over-used. The 2GP does not require
on-site parking for all activities, and in higher density residential, commercial and mixed use areas the 2GP uses fewer minimums.

In some development scenarios, a lack of on-site car parking has led to expectations that it is the Council’s responsibility to then provide for car parking options either on-street or through supporting creation of more parking buildings. This expectation also competes with the DCC’s ability to implement infrastructure for other modes, for example cycle or bus lanes.

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

While identification of appropriate controls should ultimately be a matter to be determined locally, there is benefit in MFE assessing and identifying suitable approaches to manage on-site and neighbourhood amenity while still allowing increased density. This would be an appropriate matter for inclusion as guidance, including appropriate ‘expert’ evidence and material that could be adopted to meet the requirements of s32. This would help to minimise each Council re-inventing the wheel. A suite of options (or ranges) which could be selected by Councils and incorporated into District Plans would be beneficial, in particular for:

- height / height in relation to boundary / boundary setback packages that are suitable in different zone types, for flat and sloping land
- an appropriate amount of outdoor living space in different zone types and for different types of residential activity
- minimum floor area of residential units (where necessary)
- site coverage (which reflect different types of stormwater management scenarios)

The proposed review of the RMA could consider the possibility of a streamlined approach to inclusion of model provisions based on the above. This option is preferred over the use of the National Planning Standards, which strictly limits the options.

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?**

Yes. The requirement to assess demand and capacity is necessary for Councils to fully understand their housing and business land capacity needs. The DCC notes it is already implementing this approach as required under the NPS-UDC and would support a requirement to continue to do so.

The DCC supports the easing of the requirements around using market indicators for business land. The clarification that market indicators must be reported on annually rather than quarterly provides additional flexibility and is supported.

Policy P8C requires that price efficiency indicators are analysed to understand how well the market is functioning and how planning may affect this. The DCC already monitors price efficiency indicators, but due to data availability and the influence of non-planning factors, these have generally not provided reliable insight into the impact of planning on the housing market.
13. Do you support inclusion of policies to improve how local government works with iwi, hapu and whanau to reflect their values and interests in urban planning?

The proposed policies reflect good practice for involving iwi and hapū in resource management decisions. The DCC supports this approach.

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/hapu? Why/why not?

Yes. The DCC supports working with the ORC, iwi and providers of development and other infrastructure on implementing the NPS-UD.

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

The NPS-UD is likely to be gazetted either immediately before, or at the same time as notification of Variation 2. This is not ideal as the Variation will potentially need to respond to a changed, and unknown, set of policies. The timeframe for implementing Policy P6C is particularly problematic. The DCC would prefer a longer time period to notify a plan change to address that policy, for example 3 years from gazettal.

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

The need for additional guidance has been identified in response to the questions above.

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 and include any suggestions you have for addressing these issues.

Please see the DCC’s submission in relation to the proposed NPS for Highly Productive Land.

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.

The DCC continues to have strong reservations about the use of national planning standards which may reduce the effectiveness and clarity of plans, redirect staff resources from making substantive changes to plans to implement national or regional direction to making cosmetic changes, and to potentially make good planning practice harder by promoting the use of ‘cookie-cutter’ zones.

The DCC prefers the development of ‘model’ provisions that could be incorporated into fast tracked plan process as deemed necessary to improve plan efficiency and effectiveness, but still leave room for local bespoke solutions that will lead to more effective planning responses.

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?
The requirement to undertake a housing and business capacity assessment currently only applies to MUCs. However, in practice, all councils will need to undertake such an analysis to determine if the requirement to provide sufficient capacity under Policy PA4 is met. The draft policies AP1 – AP17 provide a useful framework to completing a robust assessment and should also apply to medium growth urban environments. The following comments are made on the assumption that this methodology will be used by the DCC in preparing its own capacity assessments.

Requiring scenario testing will enable a better understanding of how variation from projections could impact capacity availability and assist decision-making.

The proposal in Policy AP4 to introduce a separate feasibility test for long-term capacity which provides flexibility for councils to look beyond current costs and revenues is supported. This is more appropriate than the existing NPS-UDC requirement and allows HBAs to take a more realistic approach to long-term capacity.

Policy AP6 requires the use of price efficiency indicators to assess how plans may affect the supply and price of dwellings. The DCC already monitors price efficiency indicators, but due to data availability and the influence of non-planning factors, these have generally not provided reliable insight into the impact of planning on the housing market.

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

The policies provide a robust approach to undertaking capacity assessments.

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).

The approach outlined will require the DCC to provide additional capacity above that currently assessed. However, the approach of adding an additional margin over and above consideration of likely take up is a reasonable requirement and consistent with the approach intended to be taken under Variation 2. The proposed margins seem appropriate.

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

Guidance on assessing demand and capacity by type could confirm that ‘type’ includes dwelling size. This would clarify that smaller dwellings, which (all things being equal) are likely to be more affordable, need to be enabled through the planning framework.

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

See answer to question A1.
Suggested drafting changes to NPS-UD

Dunedin City Council

21 October 2019

<table>
<thead>
<tr>
<th>Proposed objective/policy/definition</th>
<th>Notes</th>
<th>Additional comments</th>
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<tr>
<td>O2: To enable quality urban environments that make it possible for all people, whānau, communities and future generations to provide for their well-being, including by spatial planning that: a) <strong>offering</strong> promotes housing with good accessibility by a variety of travel modes, people access to a choice of homes that meet their demands, to jobs, opportunities for social interaction, high-quality diverse services and open space b) <strong>provides for a variety of dwelling types to meet the needs of the range of households</strong> c) <strong>promotes good urban design principles</strong> d) <strong>considers Section 6 (matters of national importance) values that should be protected</strong> e) <strong>providesing businesses with economies of scale, with access to many consumers, suppliers, skilled people and sources of innovation</strong> f) <strong>supports the efficient using of land, energy and development and other infrastructure efficiently</strong> g) <strong>responding to changing needs and conditions.</strong></td>
<td>• Applies to all urban environments • Applies immediately</td>
<td>• Clause (a) should more explicitly address issue of accessibility by travel modes as a critical concern for spatial planning • Dwelling types (as used in P2A) is a better concept than housing choice as choice has been argued to mean providing for housing in any location on any size lot (e.g. rural residential) even when in conflict with other goals • It is critical that the concept of quality urban environments is linked to good urban design principles, especially as this concept needs to link to Objective O4, which is about supporting change that leads to good (albeit different) amenity outcomes</td>
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Option of new definition: **Quality urban environment** means an urban environment which provides for the social, economic, and cultural well-being of all its people and communities, including future residents, through availability of sufficient housing, employment, utilities, goods and services, community facilities and transport modes, provided in an efficient, integrated and attractive way, while minimising adverse effects on the natural environment.

<p>| | • Applies to all urban environments | • Applies immediately |
| | | | This is an alternative option to describing the features of a quality urban environment in an objective or policy. |
| | | | If this option was selected, O2 could be combined with O3 and simply read “Enable development that contributes to the creation and enhancement of quality urban environments”. The policies would provide the detail on how. |
| | | | ‘future residents’ is preferred to ‘future generations’ because it has a wider connotation, including immigrants etc. rather than just those who are born here. |</p>
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<td>O3: To enable development in locations and in ways that maximise its positive contribution to, and minimise its negative impact on, quality urban environments.</td>
<td>• Applies to all urban environments • Applies immediately • New objective</td>
<td>• This policy could if considered in isolation directly conflict with the goals expressed in Objective O2. The NPS needs to provide guidance on how to balance and prioritise these conflicts • Amended clause (b) and (d) moved to sit under Objective O5. • Amend numbering to P3 • The aspects of policies P2A and P2B that relate to consent applications appear to open the door to urban development that is not provided for in the plan, which could compromise the ability to effectively and efficiently service growth areas as well as lead to costly litigation where areas are identified in areas that conflict with areas that need to be avoided for reasons such as hazards, landscape or other section 6 matters. These policies should be removed or clarified.</td>
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<tr>
<td>P2A: When making planning decisions that affect urban development, and the way and rate at which development capacity is provided, local authorities must have particular regard to:</td>
<td>• Applies to all urban environments • Applies immediately • Amended NPS-UDC 2016 policy PA3</td>
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<td>a) enabling a range of dwelling types and locations, working environments and business locations</td>
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<td>b) limiting as much as possible adverse impacts on the competitive operation of land and development markets, where not in conflict with providing quality urban environments (Objective 2).</td>
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<td>When making decisions on consent applications within areas zoned for residential development that propose new residential development or affect urban development, and the way and rate at which development capacity is taken up, decision-makers must have regard to the need, consistent with this NPS, to:</td>
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<tr>
<td>c) provide a range of dwelling types and locations, working environments and business locations</td>
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<td>d) limit as much as possible the adverse impacts on the competitive operation of land and development markets, where not in conflict with providing quality urban environments (Objective 3).</td>
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<tr>
<td>P2B: When making or updating policies, plans and strategies, local authorities must have particular regard to:</td>
<td>• Applies to all urban environments • Applies immediately • Amended NPS-UDC 2016 policy PA4</td>
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<tr>
<td>a) the positive impacts of urban development in contributing to a quality urban environment as described in O2</td>
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<tr>
<td>b) the benefits and costs of urban development at national, inter-regional, regional and district scale, as well as locally.</td>
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<tr>
<td>When making decisions on consent applications, decision-makers must have regard to:</td>
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<tr>
<td>Proposed objective/policy/definition</td>
<td>Notes</td>
<td>Additional comments</td>
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<tr>
<td>c) the positive impacts of urban development to contribute to a quality urban environment as described in O2 and d) the benefits and costs of urban development at national, inter-regional, regional and district scale, as well as locally.</td>
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<tr>
<th>Proposed objective/policy</th>
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<tr>
<td><strong>O4</strong>: To enable urban environments to evolve to meet the changing needs and values provide for the diverse and changing amenity values of individuals and communities in a way that supports creation and enhancement of quality urban environments.</td>
<td>• Applies to all urban environments • Applies immediately • New objective</td>
<td>• DCC supports the concept of enabling change where appropriate, particularly where this involves intensification necessary to meet housing capacity targets, as described under the heading ‘Amenity values in urban environments’ but notes that the language used in O4 does not articulate this well at present. O4 also needs to explicitly tie to the concept of enabling quality urban environments outlined in O2. • The language around amenity values is confusing in that it could be read to mean that it is the amenity values of people that change over time, or that different people have different views about amenity values, or that it is the amenity values of the environment itself that change over time.</td>
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<tr>
<th>Proposed objective/policy</th>
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<tbody>
<tr>
<td>P3A: In making planning decisions, and or consent decisions within areas zoned for residential development that propose new residential development, decision-makers must recognize that amenity values: a) vary among individuals and communities b) change over time. a) consider social and physical infrastructure as part of the overall assessment of amenity values and that ‘loss’ in one area may be offset by ‘gain’ in another; and b) provide for amenity to change where the change is positive overall; and c) consider the effect maintenance of existing amenity values has on the ability for future communities, including lower socio-economic groups, Māori and ethnic minorities, to provide for their well-being</td>
<td>• Applies to all urban environments • Applies immediately • New policy</td>
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</table>
P3A: In making planning and consent decisions, decision-makers should support change in urban environments where this can contribute to meeting housing capacity targets and will result in quality urban environments.

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<th>Proposed objectives/policies</th>
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</table>
| O5: To ensure local authority policies, plans and strategies enable enough opportunities for development to meet diverse demands for housing and business land and seek to minimise the impact of planning constraints on housing affordability. | • Applies to all urban environments  
• Applies immediately  
• New objective based on NPS-UDC 2016 objective OA2 | There is potential for confusion between the likelihood of take up at a property level ('likely to be taken up'), compared to a city level ('rate of take up'). It is more difficult for local authorities to take into account the former than the latter. The change in wording suggested makes this clearer.  
• It must be recognised that local authorities cannot control provision of all infrastructure and policy wording should reflect this.  
• In addition, it should be recognised that local authorities are often constrained in their ability to service sites with development infrastructure, as required by the NPS. Government assistance to resolve these issues would be of benefit. |
| P4A: Local authorities must ensure at all times their plans enable at least enough development capacity that is feasible and likely to be taken up to meet the demand for dwellings (in terms of location, typology and price) and business land (in terms of location, floor area and extent of land) over the short, medium and long term, taking into account the likely rate of take up, to ensure lack of zoned land does not constrain the competitive operation of land and development markets. A local authority meets these obligations by ensuring:  
a) Short term – that the development capacity is enabled by resource management plans and serviced with development infrastructure  
b) Medium term – that the development capacity is enabled by resource management plans and either:  
i. is serviced with development infrastructure or  
ii. the funding for the development infrastructure required to service that development capacity must be identified in a Long Term Plan required under the Local Government Act  
c) Long term – that: | • Applies to all urban environments  
• Applies immediately  
• Amended NPS-UDC 2016 policy PA1 | • Applies immediately  
• Amended NPS-UDC 2016 policy PA1  
• There is potential for confusion between the likelihood of take up at a property level ('likely to be taken up'), compared to a city level ('rate of take up'). It is more difficult for local authorities to take into account the former than the latter. The change in wording suggested makes this clearer.  
• It must be recognised that local authorities cannot control provision of all infrastructure and policy wording should reflect this.  
• In addition, it should be recognised that local authorities are often constrained in their ability to service sites with development infrastructure, as required by the NPS. Government assistance to resolve these issues would be of benefit. |
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<tbody>
<tr>
<td>i. the development capacity is identified in all relevant plans and strategies (including the FDS)</td>
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<td>Moved from P2A(b) and (d)</td>
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<tr>
<td>ii. the development infrastructure required to service it is identified in the relevant Infrastructure Strategy required under the Local Government Act 2002</td>
<td></td>
<td>While it is important to support the competitive operative of the market, this policy could undermine the need for strategic planning to ensure that growth occurs in a way that supports the efficient and effective provision of infrastructure as well as strategic objectives of plans (including strategic objectives to address section 6 and 7 matters)</td>
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<td>It is preferred that the concept is only included as shown in P4A but if a stand alone policy is required the wording to the left is preferred over how this was included in P2A as this principle is not directly related to providing quality environments more it impacts on cost of land</td>
</tr>
</tbody>
</table>

See also alternative below.

Alternative suggestion to one above: When making planning decisions that affect urban development, and the way and rate at which development capacity is provided, local authorities must have particular regard to:

a) limiting as much as possible adverse impacts on the competitive operation of land and development markets, where not in conflict with providing quality urban environments (Objective 2) or other strategic planning objectives.

When making decisions on consent applications in areas zoned for residential development that propose new residential development or affect urban development, and the rate at which development capacity is taken up, decision-makers must have regard to the need, consistent with this NPS, to:

b) limit as much as possible the adverse impacts on the competitive operation of land and development markets, where not in conflict with providing quality urban environments (Objective 2) or other strategic planning objectives.

P4B: As soon as a local authority determines that it cannot provide the required development capacity, it must notify the Minister.

- Applies to all urban environments
- Applies immediately
- Amended NPS-UDC 2016 policy PA1

P4C: In providing development capacity, a local authority must do all that is reasonably practicable within its duties and

- Applies to all urban environments
- Some infrastructure is outside the control of the local authority
<table>
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| functions to ensure that the other infrastructure required to support urban development is, or is likely to be, available. | • Applies immediately  
• Amended NPS-UDC 2016 policy PA1 |  |
| P4D: Every local authority must set bottom lines for the total amount of development capacity it must provide to meet the demand (as determined under the most recent HBA) for dwellings. Bottom lines must:  
a) be set for both the medium term and the long term  
b) be reviewed every three years. | • Applies to major urban centres  
• Inserted into plans within 12 months of HBA being completed  
• Amended NPS-UDC 2016 policies PC5-PC11 |  |
| P4E: Regional authorities must incorporate a bottom line set under P4D in their regional policy statements.  
Territorial authorities must incorporate an appropriate proportion of every bottom line in their district plans, as informed by the strategic guidance in the current applicable FDS. This must be done without using the process in Schedule 1.  
[But note that Schedule 1 must be used when amending a plan to give effect to the bottom lines.] | • Applies to major urban centres  
• Inserted into plans within 12 months of HBA being completed  
• Amended NPS-UDC 2016 policies PC5-PC11 |  |
| P4F: If an HBA indicates that a bottom line in a policy or plan is inadequate in the medium or long term, the local authority must revise the bottom line and update their policy or plan accordingly. | • Applies to major urban centres  
• Inserted into plans within 12 months of HBA being completed  
• Amended NPS-UDC 2016 policies PC5-PC11 |  |
| P4G: If an HBA or any other evidence or monitoring indicates that there is inadequate development capacity, the local authority must:  
a) consider all options (under any legislation) to enable development, such as integrated and coordinated consenting processes  
b) increase development capacity by changing policy statements and plans, including changes to zoning, objectives, policies, rules and | • Applies to major urban centres  
• Response shall be initiated within 12 months of problem being identified |  |
### Proposed objectives/policies

<table>
<thead>
<tr>
<th>Spatial layers that apply in existing urban environments and greenfield areas</th>
<th><strong>Notes</strong></th>
<th><strong>Additional comments</strong></th>
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<tbody>
<tr>
<td></td>
<td></td>
<td>• Amended NPS-UDC 2016 policy PC3</td>
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#### Notes

c) if the inadequacy relates to the long term, update its FDS

d) consider all other options for increasing development capacity.

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### Proposed objectives/policies

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<tr>
<th>O6: To ensure local authorities:</th>
<th><strong>Notes</strong></th>
<th><strong>Additional comments</strong></th>
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<tbody>
<tr>
<td>a) make decisions on urban development based on the best available evidence</td>
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<tr>
<td>b) respond promptly to evidence about changing demands for housing and business land</td>
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<tr>
<td>c) identify the evidence on which decisions about urban development are made.</td>
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<tr>
<td>d) have a clear strategic framework to guide the application of zoning to ensure urban development objectives to be realised</td>
<td></td>
<td>• Zoning decisions need to be guided by a clear set of objectives and policies (not just made on a case by case basis based on evidence). This enables consultation to be facilitated at the time of Plan development and will help avoid lengthy community debates at the time of site rezoning (NIMBYism).</td>
</tr>
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#### Notes

| Applies to all urban environments |
| Applies immediately |
| New objective |

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### Proposed objectives/policies

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<tr>
<th>PSA: District plans must include, for each zone in an urban area, a zone description that describes the expected types and nature of development, [including expected levels of amenity], consistent with growth identified in the FDS.</th>
<th><strong>Notes</strong></th>
<th><strong>Additional comments</strong></th>
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<tr>
<td></td>
<td></td>
<td>• Zoning decisions need to be guided by a clear set of objectives and policies (not just made on a case by case basis based on evidence). This enables consultation to be facilitated at the time of Plan development and will help avoid lengthy community debates at the time of site rezoning (NIMBYism).</td>
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#### Notes

<p>| Applies to major urban centres |
| Applies immediately |
| Amended NPS-UDC 2016 objective OC2 |</p>
<table>
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<th>Proposed objectives/policies</th>
<th>Notes</th>
<th>Additional comments</th>
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</table>
| P5B: Territorial authorities must:  
  a) make an assessment to ensure the objectives, policies, rules, and assessment criteria set out in district plans are individually and collectively consistent with the expected development for each zone as described in the zone description  
  b) enable the development of the zone to occur as described in the plan  
  c) monitor and report on whether development is occurring as described in the plan as a component of section 35 efficiency and effectiveness monitoring.  | - Applies to major urban centres  
- Applies at next plan review or when implementing the planning standards  
- New policy | - Note that not all zones will have wholesale change and in many places much of the development has already occurred |
| P5C: If monitoring indicates that development capacity is not being taken up to achieve the development expected in a zone, the local authority must undertake a review to understand why, and:  
  a) change relevant objectives, policies, rules and assessment criteria through a plan change to the extent needed to achieve the development expected, and/or  
  b) identify any constraints outside their resource management plans to achieving the expected development for the zone.  | - Applies to major urban centres  
- Applies immediately  
- New policy | |
| P5D: When making planning decisions that affect the development of urban environments, local authorities demonstrate analysis that includes:  
  a) a clear articulation of the resource management matters being managed  
  b) an assessment of the costs and benefits of different options for urban development and their contribution to achieving a quality urban environment (as described in Objective 1)  
  c) an assessment of the impact of different urban development options on providing enough development capacity  
  d) an assessment of regulatory and non-regulatory options for contributing to a quality urban environment and providing enough development capacity  
  e) an analysis of consistency with the relevant FDS  
  f) demonstration that they have been informed by relevant evidence and monitoring required under this NPS.  | - Applies to major urban centres  
- Applies immediately  
- New policy | |
<table>
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<tr>
<th>Proposed objective/policy</th>
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| O7: To provide for the benefits of urban intensification by allowing for increased density in areas where those benefits are best realised and where quality urban environments can be achieved. | • Applies to all urban environments  
• Applies immediately  
• New objective | |
| P6A: Enable higher-density development as required to meet housing capacity targets through intensification, especially in areas where there are both: one or more of the following a) urban amenities and services are easily accessible by existing or planned active transport and public transport networks; and b) infrastructure, services and facilities are available or can be provided effectively and efficiently. c) proximity to many employment opportunities; and d) urban amenities and services are easily accessible by existing or planned active transport and public transport networks e) high demand for housing. f) best use can be made of existing or planned infrastructure, services and facilities. | • Applies to all urban environments  
• Plan changes to be notified within 18 months of gazetting the NPS-UD  
• New policy | Problematic to only have to meet one of the criteria as there could be areas of high demand that do not have any of the other more critical criteria. Should have to meet b and d as mandatory.  
Other criteria suggested to move under Policy P6D |
| P6B: Regional councils must include the following objective into their regional policy statements: To enable residential intensification in appropriate locations to that ensure the efficient use of existing urban land, infrastructure, services and facilities. | • Applies to major urban centres  
• Applies immediately  
• New policy | Residential intensification may not be appropriate everywhere, for example in heritage precincts.  
Should this not be tied to the criteria used in P6A?  
Says it applies to major urban centres but nothing in policy wording limits it to that therefore all district plans would need to implement. |
| P6C Option 1: descriptive approach  
District plans reviews must zone for evaluate the appropriateness of higher-density residential activities within a suitable catchment in areas (ie, accessible by active transport modes and) around frequent public | • Applies to major urban centres | Not all of these locations will be appropriate nor necessary depending on an FDS. |
transport stops and centres and must provide for a suitable area of zoned land for higher density residential activities based on the targets set in an FDS. Higher-density residential activities are those with a concentrated bulk of buildings such as terraced housing and apartments.

P6C Option 2: prescriptive approach

District plans must:
- zone for high-density residential activities within an 800m walkable catchment of centres and frequent public transport stops, except where evidence demonstrates intensification should not be enabled; and
- zone all residential and mixed use areas within 1.5 km of city centres for high-density development.

High density is where there is a minimum overall density of 60 residential units per hectare.

P6D: Territorial authorities must include the following policy in their district plans:

When considering an application for a higher-density residential activity than is currently provided under this plan, the consent authority must have particular regard to whether:
- the site is in an area that is required under the NPS-UD to enable intensification
- the development will provide more choice of housing.

Combine with P6A as:
Territorial authorities must include in their district plans a policy that sets out clear criteria for where higher-density residential activity should be enabled and which includes, as a minimum, the following criteria:
- proximity to many employment opportunities;
- proximity to high quality recreational spaces;
- proximity to schools; and
- high demand for housing.

<table>
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<tr>
<th>Plan changes to be notified within 18 months of gazetting the NPS-UD</th>
<th>New policy</th>
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<tr>
<td>The NPS should not encourage circumvention of the Section 32 analysis process, which is necessary to ensure good planning outcomes.</td>
<td>New policy</td>
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<thead>
<tr>
<th>Applies to major urban centres</th>
<th>Plan changes to be notified within 18 months of gazetting the NPS-UD</th>
<th>New policy</th>
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<tr>
<td>Delete and combine with amended P6A as shown.</td>
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Example policy (p39 discussion document)
When considering a plan change that enables urban development that is not otherwise enabled in the plan in a future urban area identified in the plan or an FDS, local authorities must provide for urban development when all of the following apply:

1. Rezoning is consistent with relevant zoning policy criteria in the [district plan](#).
   a. Development enabled by the plan change would contribute to a quality urban environment, including access to transport choice.
   b. Development enabled by the plan change would not have adverse effects on protected areas or areas identified for restoration.
   c. Development under the plan change can occur in a way that is appropriate, safe, and resilient in the long term in respect of natural hazards and the effects of natural hazards.
   d. Reverse sensitivities are appropriately managed within and adjacent to the location or locations that are the subject of the plan change.
   e. Development Infrastructure to enable the long-term development of the land can be provided.

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| **P7A Option 1** Local authorities must remove any district plan rule or standard that requires the provision of car parking for any activity. | • Applies to major urban centres  
• Removal of plan rules within 18 months of gazetting the NPS-UD | |
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<tr>
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<tr>
<td>O9: To ensure every local authority with an urban environment has a robust, comprehensive and frequently updated evidence base about its urban environments.</td>
<td>• Applies to all urban environments • Applies immediately</td>
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<tr>
<td>P8A: Local authorities must use evidence and information about the land and development markets for dwellings and business land, and reflect this in their section 32 reports.</td>
<td>• Applies to all urban environments • Applies immediately • New policy</td>
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</table>
| P8B: Local authorities must monitor a range of indicators, including the following, on a quarterly basis, to ensure they are well-informed about their markets for housing and business development capacity, and urban development activity and outcomes:  
a) prices and rents for housing, residential land, and business land by location and type, and changes in these over time  
b) the number of dwellings receiving resource or building consents relative to the growth in households  
c) the type and location of dwellings receiving resource or building consents | • Applies to all urban environments • Applies immediately • Amended NPS-UDC 2016 policy PB6 | |
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<tr>
<td>d) the housing price to cost ratio</td>
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<td>e) indicators of housing affordability</td>
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<td>f) available data on business land.</td>
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<td>Local authorities must publish the results of their monitoring of indicators at least annually.</td>
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**P8C:** Local authorities must:
- a) use information from indicators of price efficiency in their land and development market as it becomes available
- b) analyse that information to understand how well the market is functioning and how planning may affect this, and when additional development capacity might be needed
- c) prepare and publish a report on the analysis.

- • Applies to major urban centres
- • Applies immediately
- • Amended NPS-UDC 2016 policy PB7

**P8D:** Local authorities must assess demand for housing and business land, and the development capacity required to meet that demand in the short, medium and long term.

- • Applies to all urban environments
- • Applies in time to inform major plan changes
- • New policy

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<tr>
<td>O9: Urban development occurs in a way that takes into account resource management issues of concern to iwi and hapū.</td>
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- • Applies to all urban environments
- • Applies immediately
- • New objective

**P9A:** When preparing a proposed policy statement, plan or strategy that affects how development capacity is provided for in urban environments every local authority must:
- a) provide iwi and hapū with opportunities to identify the resource management issues of concern to them relating to urban environments; and
- b) indicate how those issues have been or will be addressed in the proposed policy statement, plan or strategy.

- • Applies to all urban environments
- • Applies immediately
- • New policy
P9B: When preparing a proposed policy statement, plan or strategy that affects how development capacity is provided for in urban environments every local authority must:

a) provide hapū and whānau with opportunities to identify their aspirations for urban development on whenua Māori within their rohe

b) take into account their aspirations for urban development on whenua Māori within their rohe.

- Applies to all urban environments
- Applies immediately
- New policy

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<td>O10: To ensure decisions within local authorities and across local authority boundaries are coordinated and aligned with the provision of development and other infrastructure.</td>
<td>• Applies to all urban environments • Applies immediately • Amended NPS-UDC 2016 objective OD2</td>
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<tr>
<td>P10A: Local authorities that share jurisdiction over an urban environment are strongly encouraged to work together to implement this NPS, having particular regard to cooperate and agree on: a) the provision and location of feasible development capacity required by it; and b) principles and practices for partnering with iwi and hapū.</td>
<td>• Applies to all urban environments • Applies immediately • Amended NPS-UDC 2016 policy PD1(b)</td>
<td></td>
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<tr>
<td>P10B: Local authorities must work with providers of development and other infrastructure to a) achieve integrated land use and infrastructure planning b) implement policies P4A and P4C.</td>
<td>• Applies to all urban environments • Applies immediately • Amended NPS-UDC 2016 policy PD2</td>
<td></td>
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<tr>
<td>P10C: Local authorities that share jurisdiction over a major urban centre are strongly encouraged to collaborate and cooperate to agree on: a) the preparation or review and content of a joint HBA b) the specification and review of the bottom lines required under this NPS c) the development or review of a joint FDS.</td>
<td>• Applies to major urban centres • Applies immediately • Amended NPS-UDC 2016 policy PD3</td>
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