Masterton District is comprised of urban, rural and coastal areas. Our district has a strong provincial background that has been shaped by the primary industries that our economy was built on.

Our population is 25,700, an increase of 500 from the 2013 Census, with 73% of the population living in the urban area of Masterton.

Building consents have increased, with 178 new dwellings in the 2018/19 year.

New subdivisions, already consented in the district, provide for approximately 1,000 allotments within the urban boundary.

Masterton’s economy is showing encouraging signs of growth. Our local economy grew by 2.3% in 2018/19 (higher than Wellington’s increase of 2.1%).

Our Vision is: Providing the best of rural provincial living

Introduction

Thank you for the opportunity to submit on the discussion document for the National Policy Statement – Urban Development (NPS-UD).

Masterton District Council supports the submission of LGNZ and SOLGM and makes further comments from a local perspective.

We strongly believe that ‘one size fits all’ is not a desirable outcome. There must be flexibility to allow cities and towns to use their unique attributes to best advantage and in a manner supported by their community.

Masterton District Council is also concerned at the competing nature of the NPS-UD and the Proposed National Policy Statement for highly productive land. Highly productive land should be protected to provide food for the increased population of our area and country.

One of the real obstacles to enabling development is the lack of funding for infrastructure and the financial tools to enable this.
As your own analysis points out, many of the identified problems that the NPS-UD seeks to address will only be addressed through wider system change (both resource management and housing/urban development) and more flexible funding tools for local government.

In answer to the questions posed by the discussion document we make the following additional observations from a local perspective:

Q.1 Do you support a National Policy Statement on Urban Development that aims to deliver quality urban environments and make room for growth?

We strongly support better quality urban environments and are currently progressing the Shaping Our Future strategy for Masterton’s Town Centre with exciting CBD projects as our initial focus. See: https://mstn.govt.nz/council/projects/cbd-village-concept-upgrades/

We agree that there is room for improvement across the country in the way we can deliver quality urban environments and want to see an NPS that preserves the ability for local choices and local solutions.

Council’s undertake land use planning and intended growth through their democratic processes and planning documents. This NPS adds an additional, unfunded burden.

Q.2 Do you support the approach of targeting the most directive policies to our largest and fastest growing urban environments?

We agree that the most directive policies should be aimed at the larger and fastest growing cities that do not seem to have the land available for future expansion, including those where development spills over boundaries.

Undertaking Housing and Business Development Capacity Assessments and a future development strategy in the form envisaged in the draft will be major pieces of analysis and should be targeted to those centres where growth and capacity needs are most urgent and sizeable.

However, this does not mean that they should have to pay all of the cost of delivering the Housing and Business Development Capacity Assessments when they are for the national benefit.

Settlement patterns change and it will be important to periodically review the targeting of these policies.

Q.3 Do you support the proposed changes to future development strategies (FDS’s) overall?

We support integrated planning of land use, housing, growth and infrastructure. We are participating in the development of the Wellington Region’s Regional Growth Framework and have recently completed our own Growth Study for Masterton, which will shape out Long Term Planning, Asset Management Plans and review of the Wairarapa Combined District Plan.

Small local authorities with small urban centres, such as ourselves, should not have to prepare a FDS.

With phase two of the RMA reform ahead of us, we also don’t want local authorities to do work twice. We need a transition timeframe that enables local authorities to
complete a FDS and adjust to future RMA reforms in an affordable fashion for our ratepayers.

Q.4 Do you support the proposed approach of the NPS-UD providing national level direction about the features of a quality urban environment?

Masterton District Council supports the principle that a quality urban environment is an urban environment that meets the social, economic and cultural needs of people and communities. The preamble (which does not have legal weight) is a positive change from the current NPS-UDC. We specifically support achieving urban environments that:

- reduce the impact on the natural environment
- use ecologically sensitive design
- enhance safety and good health
- promote resilience to the impacts of natural hazards
- provide a range of transport options
- reflect historical and cultural heritage.

The word “quality” should be able to be interpreted by each Council to reflect the aspirations of individual communities balancing social, economic and cultural issues and aspirations.

We do not however support parts of the objectives and policies as currently drafted as they are not suitable for decision making in rural provincial New Zealand, for example “d) limit as much as possible the adverse impacts on the competitive operation of land and development markets”.

We do not agree with the level of national direction proposed.

Q.5 Do you support the inclusion of proposals to clarify that amenity values are diverse and change over time?

Whilst Masterton District Council agrees that amenity values are diverse and change over time, each environment is different, and it is the prerogative of local communities to decide what amenity values are most important for their district.

Q.6 Do you support the addition of direction to provide development capacity that is both feasible and likely to be taken up? Will this result in development opportunities that more accurately reflect demand?

Some direction in the larger cities may be acceptable but there are a number of matters, that if addressed, would enable more development capacity. There are also a number of issues that are beyond the control of Councils, for instance funding for infrastructure, the pace and cost of construction and availability of qualified all have a bearing on demand and supply.

Q.7 Do you support proposals requiring objectives, policies, rules, and assessment criteria to enable the development anticipated by the zone description?

Masterton District Council do not support such a prescriptive approach as this leaves little room for innovation and demographic changes. This just adds another layer of regulation to be navigated by an already over regulated market.

Q.8 Do you support policies that enable intensification in the locations where its benefits can best be achieved?
Masterton District Council totally supports the comments made by LGNZ with regard to this question. Local Council’s and their communities are better placed to make these decisions.

Q.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?

Masterton District Council would not support this without some restraints in place to protect individual property owners. This should also be looked at alongside the NPS for Highly Productive Land.

Q.10 Do you support limiting the ability for local authorities in major urban centres to regulate the number of car parks required for development?

Masterton District Council does not agree with the proposal to limit a local authority’s ability to regulate carparking required for development. In towns where there is limited public transport and an aging population the outcome of this regulation could be counterproductive and, in some cases, remove the Council’s ability to negotiate better overall development.

We do support policy and guidance that promotes better urban form, walking, cycling and livability.

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

No, we do not agree that directive intervention is necessary. Central government tends to have a one size fits all mentality, which takes away the ability of local communities to reflect their aspirations and often increases cost (and exacerbates affordability issues).

Q.12 Do you support requirements for all urban environments to assess demand and supply of development capacity, and monitor a range of market indicators?

Councils already assess demand and supply of development capacity as part of asset and infrastructure management. Modelling, such as proposed by government, is not supported.

The monitoring requirements are excessive in their frequency and we are concerned about the cost and ability for small councils to monitor market indicators. While the indicators should provide useful information for RMA Section 32 reports, the costs for a small council to resource this monitoring are likely to be out of proportion to the issues faced outside of high and medium growth areas.

We would prefer to see government investment in better quality data at the sub-regional level.

Q.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?

Masterton District Council supports proactive engagement with iwi and hapu in all areas of community planning and development. We need to work at the pace and scale most appropriate to iwi and hapu for the relevant urban area.
Q.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?

See above.

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

Timing must be realistic and affordable.

Q16. What kind of guidance or support do you think would help with the successful implementation of the proposed NPS-UD?

Masterton District Council supports the four key recommendations in the LGNZ submission.

Q.17 Do you think there are potential areas of tension or confusion between any of these proposals and other national direction?

Yes. The key one for Masterton District Council is the relationship of the draft to the National Policy Statement for Highly Productive Land and the new direction for Freshwater Management.

At Q.7 it is being suggested that a very prescriptive approach be taken towards zone descriptions and Q.8 where a mandate is being suggested to enable intensification. On the other hand, Q.9 is suggesting that Councils should be able to approve plan changes that have not even been identified.

Q.18 Do you think a national planning standard is needed to support the consistent implementation of proposals in this document?

Local initiatives across territorial boundaries outside the major urban areas would be better than a one size fits all approach sent down from central government.

It is unrealistic to impose a set of planning standards on cities where boundaries are constrained and the same set of standards on towns who have sufficient capacity for expansion into the foreseeable future.

Thank you for the opportunity to comment.

10 October 2019