Proposed National Policy Statement on Urban Development

Submission

Contact details

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1. WPDL generally supports the proposed NPS, but has two concerns:
   a. inadequate consideration of the issue of affordability;
   b. inadequate consideration of the demand from, or requirements of, specific age groups, particularly the older retirement age group.

2. The existing NPS-UDC 2016 includes a definition of ‘Demand’ which includes as one component “the demand for different price points ...”. The reference to ‘price points’ is effectively a reference to affordability. As a consequence, every time the word ‘demand’ is used in the NPS-UDC 2016, affordability is a consideration which must be taken into account.

3. The proposed NPS-UD deletes the definition of ‘Demand’ and states that “… specific components of demand intended to be used under the NPS-UD are included in the policies themselves ...”. However the draft NPS objectives and policies contain only one reference to ‘price’ which can be found in proposed Policy P4A. Therefore the issue of affordability of housing, which is a significant issue throughout New Zealand, is significantly downgraded as a relevant consideration when it comes to applying the objectives and policies of the proposed NPS-UD. WPDL considers that the issue of affordability warrants considerably greater focus on, and reference to, the price of housing.
4. WPDL is concerned that the proposed NPS does not contain any reference to demographic factors, such as age groups. This issue is particularly relevant to provision for retirement living. It is a well known fact that the so-called ‘baby boomer’ generation is entering the retirement phase of their lives which is generating significant demand for retirement living residential product and development. That specific aspect of residential demand is of such significance that WPDL considers that it warrants specific mention in this NPS.

5. WPDL suggests that both of the issues commented on above could be addressed by amending proposed Policies P2A and P4A as set out below (proposed amendments identified by track change deletion/underlining):

   **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:

   a) enabling a range of dwelling types, and locations, and prices, for a range of age groups, working environments and business locations

   b) limiting as much as possible adverse impacts on the competitive operation of land and development markets.

   When making decisions on consent applications that 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:

   c) provide a range of dwelling types, and locations, and prices, for a range of age groups, working environments and business locations

   d) limit as much as possible the adverse impacts on the competitive operation of land and development markets.

   **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 age group) and business land (in terms of location, floor area and extent of land) over the short, medium and long term.

   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.