SUBMISSION ON PROPOSED NATIONAL POLICY STATEMENT ON URBAN DEVELOPMENT

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Introduction

1. This is a joint submission on behalf of the Auckland District Health Board and the Waitemata District Health Board (the DHBs) on the Proposed National Policy Statement on Urban Development (NPS-UD). A discussion document on NPS-UD (Discussion Document) was notified by the Ministry for the Environment and the Ministry of Housing and Urban Development on 21 August 2019.

2. The aim of the NPS-UD is to enable growth in urban areas by requiring councils to provide development capacity to meet the diverse demands of communities, address unnecessary regulatory constraints, and encourage quality urban environments. The intention is to ensure that growth is strategically planned and leads to well-functioning cities that contribute positively to people’s wellbeing.
The DHBs and relevant challenges they are facing

3. The DHBs are independent crown entities.

4. Waitemata District Health Board (WDHB) provides health services to more than 630,000 residents in the North Shore, Waitakere and Rodney. It has the largest population of any district health board in New Zealand and is expected to serve approximately 800,000 people by 2036. WDHB employs more than 7,500 people in more than 31 different locations across North and West Auckland including at North Shore Hospital, Waitakere Hospital and the Mason Clinic (which provides Regional Forensic Psychiatric Services).

5. Auckland District Health Board (ADHB) provides health and disability to services to the around 515,000 people living in the Auckland DHB area (including the Hauraki Gulf islands). In addition to standard secondary services (e.g. general medicine and orthopaedics), ADHB provides national and regional specialist services where those are not available in other district health board areas. It currently has three major facilities: Auckland City Hospital, Starship Children's Hospital and the Greenlane Clinical Centre. Auckland City Hospital is New Zealand's largest public hospital, as well as the largest clinical research facility. There are approximately one million patient contacts each year, including hospital and outpatient services. ADHB has approximately 11,000 health and medical staff employed, which equates to nearly 9,200 full-time equivalent positions.

6. In conjunction with the Northland and Counties-Manukau district health boards, the DHBs have developed a Regional Long Term Investment Plan (RLTIP) for the 'Northern Region' (comprising the areas served by those four district health boards). The RLTIP has been accepted by the Ministry of Health.

**Significant investment is needed to meet the growing demand for healthcare**

7. Population growth and ageing, combined with poor diets, increasingly sedentary lifestyles, advances in technology and a growing prevalence of long-term chronic conditions, are resulting in significant pressures on most health services, particularly in the Northern Region.

8. This increased demand for healthcare will place increasing pressure on hospitals and other healthcare facilities in the region.
9. For example:

(a) the Northern Region already has a shortage of hospitals beds for adult medical, surgical and assessment, treatment and rehabilitation services and the DHBs’ projections indicate that demand for those services will continue to grow.

(b) shortfalls are projected in inpatient acute beds, operating and interventional rooms, diagnostic suites, cancer care and critical care.

(c) specialised age care service beds, such as those dedicated to dementia and psychogeriatric care, are in high demand across the region.

10. The Northern Region will require significant investment to develop the necessary additional capacity to meet the expected population growth and demographic change over the next 20 years.

11. Increased use of primary and community-based services and intensifying and expanding existing sites are a key part of the answer.

(a) WDHB has established its ‘Waitemata 2025’ programme which aims to develop major clinic facilities and substantively replace ‘not fit for purpose’ facilities. As part of this programme, several building projects are underway or have been completed, at North Shore Hospital, Waitakere Hospital and the Mason Clinic.

(b) ADHB has established its ‘Building for the Future’ programme, which will increase acute and elective capacity at Auckland City Hospital and the Greenlane Clinical Centre. The programme aims to deliver the additional adult inpatient, operating room and related supplementary capacity required over the next ten years, to address the projected increase in patient demand.

12. However, on their own, increased use of primary and community-based services and expansion of existing sites will not best meet the Northern Region’s communities’ needs. The DHBs have identified that they need to:

(a) significantly increase healthcare infrastructure in the west and south of Auckland; and
(b) undertake the advance purchase of the land required to enable that development.

13. Investment in hospitals and healthcare supports the Government’s agenda for increased wellbeing and aligns with the domains and capitals described in the Living Standards Framework (LSF) (the NZ Treasury-developed framework on intergenerational wellbeing spanning a broad range of economic, social and environmental outcome domains). Benefits from investment in hospitals and healthcare facilities which relate to the LSF’s ‘health’ domain include:

(a) **sustainable delivery of patient care**: investment in additional capacity and supporting services will ensure people have timely access to the services they need;

(b) **improved patient experience and outcomes**: increasing the number of inpatient beds, and associated supporting services, will mean that patients receive more timely care, in the right environment with the right staff to support them. This will result in overall better clinical outcomes as well as increased staff and patient satisfaction with the facilities.

(c) **safer and more efficient use of resources**: patients will be admitted to the best place for their care when they need it.

**Impeded healthcare access and overcrowded or poor-quality accommodation**

14. People in the Auckland area are increasingly facing housing and transport challenges which are impacting their need for health services, and impeding their ability to access health services.

15. Further, many people, particularly those in areas of high socio-economic deprivation, live in overcrowded housing or poor-quality accommodation. These housing problems increase the risk of spreading infectious diseases, with young people particularly vulnerable.

**The DHBs’ overall position on the proposed NPS-UD**

16. The DHBs oppose the NPS-UD in part and support the NPS-UD in part.
17. The DHBs support the development and implementation of a national policy statement on urban development. However, the current NPS-UD proposals do not appropriately provide for social infrastructure or access to healthcare facilities and could potentially create adverse impacts on health and wellbeing.

18. The NPS-UD focuses on providing for residential and business land, and intensification of residential and business activities. Currently, it fails to appropriately:

(a) address the need for:

(i) land for social infrastructure (such as hospitals and other healthcare services); and

(ii) integration of residential and business development and the provision of network/linear infrastructure with social infrastructure; or

(b) support the intensification of existing social infrastructure.

19. Further, currently the NPS-UD does not explicitly require Resource Management Act 1991 (RMA) decision-makers to consider whether:

(a) proposed intensification of urban development would ensure the efficient use of existing healthcare facilities; or

(b) social infrastructure (such as healthcare facilities) is likely to be provided within an appropriate timeframe to service proposed greenfield developments.

20. The NPS-UD also currently:

(a) does not specifically require the infrastructure provided to support growth to meet the needs of relevant infrastructure users (e.g. the need for 24-hour access to hospitals by emergency vehicles and people with mobility issues); and

(b) proposes more directive intervention at a national-level which has the potential to lead to adverse effects for health and wellbeing.
21. The changes the DHBs are seeking to the NPS-UD are set out in the Appendix to this submission and described below.

**Appropriately providing for social infrastructure**

22. To enable people and communities to provide for their wellbeing and health and safety, local authorities and others need to plan for social infrastructure activities, and integrate those activities with network/linear infrastructure (especially transport infrastructure), in the same way as residential and business activities.

23. To achieve this, the DHB’s are seeking changes to the proposed NPS-UD provisions to require:

(a) the Future Development Strategies (FDSs) prepared by the local authorities in major urban centres to appropriately provide for social infrastructure;

(b) social infrastructure to be appropriately taken into account when decisions are made about enabling intensification or greenfield development; and

(c) local authorities to:

   (i) ensure that their plans enable sufficient social infrastructure capacity, in terms of location and extent of land;

   (ii) make decisions on social infrastructure that are based on evidence and analysis;

   (iii) monitor and assess the provision of social infrastructure and social infrastructure land;

   (iv) take into account hapū and whānau aspirations for social infrastructure; and

   (v) coordinate with other local authorities and other social infrastructure providers in the provision of social infrastructure and social infrastructure capacity.
Definition of Social Infrastructure

24. The NPS-UD includes a proposed definition of ‘Development infrastructure’ which is limited to network infrastructure for water supply, wastewater, stormwater and land transport, and a proposed definition of ‘Other infrastructure’ which includes “social infrastructure such as schools and healthcare” (as well as telecommunications, energy, and other infrastructure not controlled by local authorities).

25. Some of the proposed NPS-UD objectives and policies also refer to ‘Infrastructure’, which, as defined in section 2(1) RMA, is narrow and only relates to networks for transport, energy, water and wastewater, and telecommunications.

26. The DHB’s seek for a new definition of ‘Social infrastructure’ to be inserted in the NPS-UD, and for the NPS-UD definition of ‘Other infrastructure’ to be amended, to clearly distinguish between linear/network ‘infrastructure’ and social infrastructure land uses.

27. The new definition of Social Infrastructure is critical for the appropriate recognition of social infrastructure throughout the NPS-UD objectives and policies as sought in this submission.

Consistency with the National Planning Standards

28. The terminology used in the NPS-UD is not always consistent with the terminology used, or terms defined, in the first set of National Planning Standards. This lack of consistency is likely to create problems for the local authorities that will need to comply with the National Planning Standards when changing their policy statements and plans to give effect to the NPS-UD.

29. Therefore, the DHB’s are seeking:

(a) changes to the proposed NPS-UD definitions so that those definitions utilise relevant terms defined in the National Planning Standards; and

(b) amendments to proposed NPS-UD provisions so that they use terminology that is consistent with those defined terms, and the National Planning Standards generally.
Specific recognition of the need to provide for ‘health and safety’

30. The DHBs support the NPS-UD providing national-level direction about the features of a quality urban environment.

31. However, because the description of the sustainable management purpose of the RMA (in section 5(1)) distinguishes between various kinds of wellbeing and health and safety, the DHBs seek for express reference to “health and safety” to be included in proposed Objective O2.

The infrastructure provided to support growth should be required to meet the needs of relevant infrastructure users

32. The DHBs encourage people to access their healthcare facilities using active transport modes and public transport. However, significant numbers of patients have temporary or permanent mobility issues, or due to health risks (such as the risk of spreading infectious diseases) should not travel on public transport.

33. Further, hospitals need to be accessible 24 hours a day by emergency services, including road ambulance services and air ambulance helicopter services.

34. Therefore:

(a) hospitals need to be serviced by transport infrastructure which has the capacity to allow timely access to hospital facilities; and

(b) hospitals and other healthcare facilities need to provide parking.

35. Currently, the NPS-UD:

(a) does not specifically require the infrastructure provided to support growth to meet the needs of relevant infrastructure users, and in particular critical users such as healthcare facilities; and

(b) proposes to remove, or constrain, local authorities’ ability to impose minimum parking requirements.
36. Removing minimum parking requirements, particularly for commercial and residential activities, would create a risk that users of such activities located near hospitals and other healthcare facilities would seek to use the parking provided at the healthcare facilities. Use of those carparks by visitors to other activities would reduce access to those facilities for those who need them.

**National-level directive intervention potentially leading to adverse effects for health and wellbeing**

37. One of the proposals on pages 42 to 45 of the Discussion Document is to consider precluding RMA plan rules which set “minimum floor areas/apartment sizes” on the basis that this reduces “the variety the market can offer”.

38. The DHBs would be concerned if national direction was used to remove rules relating to minimum house or apartment sizes without those rules being replaced by other provisions which ensure that local authorities do not permit, or grant consent for, dwellings that create a significant risk of household crowding.

39. Household crowding can increase the spread of infectious diseases. In particular, it is a risk factor for lower respiratory infections (including pneumonia), meningococcal disease, gastroenteritis, Hepatitis A, and tuberculosis. There is also evidence to suggest that household crowding is a risk factor for upper respiratory tract infections and eye infections. In 2007–2011, an estimated 1,343 hospital admissions for infectious diseases were caused by household crowding annually in New Zealand.¹

40. In New Zealand, a household is generally considered crowded if, under the Canadian National Occupancy Standard, at least one more bedroom is needed than is provided.

41. This example illustrates the potential unintended and adverse health consequences that could arise if the NPS-UD seeks to apply more directive intervention at a national level to rules that are more appropriately considered in the context of the relevant district plan provisions.

Changes sought

42. The DHBs seek:

(a) for the proposed NPS-UD provisions to be amended as set out in the Appendix to this submission; and

(b) any additional, alternative or consequential amendments to the proposed NPS-UD necessary to address the DHBs’ concerns, as outlined in this submission and the Appendix.

43. The changes the DHBs are seeking to the proposed NPS-UD provisions are necessary to appropriately recognise and provide for the intensification and development of essential healthcare facilities for the health and well-being of New Zealanders.

44. The DHBs appreciate the opportunity to provide this submission on the proposed NPS-UD, and would be happy to discuss the matters raised and amendments sought in further detail.

DATED this 10th day of October 2019

Auckland District Health Board and Waitemata District Health Board by their solicitors and duly authorised agents

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APPENDIX - SUGGESTED CHANGES TO NPS-UD PROVISIONS

Appendix 2: Definitions and acronyms

1. The DHB’s seek for the proposed definition of ‘Other infrastructure’ to be amended as set out below, and the following new definition of ‘Social infrastructure’ to be inserted in the NPS-UD (to clearly distinguish between linear/network ‘infrastructure’ and social infrastructure land uses).

2. The DHBs are also seeking for:

   (a) a new defined term ‘Social infrastructure capacity’ to be inserted into the NPS-UD (given that the definition of ‘Development capacity’ in section 30(5) RMA only defines that term “in relation to housing and business land in urban areas”);

   (b) a further new defined term ‘Social infrastructure land’; and

   (c) changes to the proposed NPS-UD definitions (and objectives and policies) so that those provisions utilise relevant terms defined in the National Planning Standards.

3. For example, the DHBs seek for the definitions of ‘functional need’ and ‘operational need’ in the National Planning Standards to be included in the NPS-UD to support the DHBs’ proposed changes to Policy P1D and the example policy in relation to further greenfields development (set out below).

4. The DHBs also seek for a new defined term ‘Other relevant strategies, plans and documents’ to be included in the NPS-UD (defined as set out below), to ensure that all of the key documents that would appropriately inform local authorities’ decisions about urban development are taken into account.

Amendments sought

*Other infrastructure* means:

(a) public open space;

(b) community infrastructure as defined in the Local Government Act 2002;

(c) land transport as defined in the Land Transport Management Act 2003, that is not controlled by local authorities;

social infrastructure, such as schools and healthcare;
(d) telecommunications as defined in the Telecommunications Act 2001;
(e) energy generation, storage, transmission and distribution infrastructure;
(f) other linear/network infrastructure not controlled by local authorities.

**Social infrastructure** means:
(a) both privately and publicly owned, community facilities (such as health facilities and community correctional facilities), justice facilities (such as police stations, courts and prisons), and educational facilities
(b) public open space
(c) community infrastructure as defined in the Local Government Act 2002

and includes any ancillary activities.

**Social infrastructure capacity** means the capacity of land for social infrastructure based on:
(a) the zoning, objectives, policies, rules, precincts, development areas and designations that apply to the land under the relevant proposed and operative regional policy statements, regional plans and district plans, and
(b) the provision of adequate development infrastructure and other infrastructure to support that land use at the proposed scale and intensity.

**Social infrastructure land** means:
(a) land that is identified in the relevant district plan as being located within one of the following types of zones:
   i. an open space or recreation zone
   ii. a corrections zone
   iii. a hospital zone
   iv. a stadium zone
   v. a tertiary education zone
   vi. another special purpose zone for a social infrastructure purpose
(b) land which is subject to a designation for a social infrastructure purpose
residential land or business land which is subject to district or regional plan objectives, policies and rules that appropriately provide for the types, intensities and scales of social infrastructure that are necessary or desirable in the relevant zone.

New definitions

Future urban land means land that is identified in the relevant district plan or regional coastal plan as being located within a future urban zone or an equivalent zone.

Residential land means land that is identified in the relevant district plan as being located within a residential zone.

Definitions from the National Planning Standards

Functional need means the need for a proposal or activity to traverse, locate or operate in a particular environment because the activity can only occur in that environment.

Operational need means the need for a proposal or activity to traverse, locate or operate in a particular environment because of technical, logistical or operational characteristics or constraints.

Other relevant strategies, plans and documents include:

(a) the national land transport programme prepared under the Land Transport Management Act 2003;
(b) relevant plans prepared by district health boards;
(c) in Auckland, the Auckland Plan;
(d) any non-statutory regional development strategies or spatial plans prepared by local authorities either by themselves or in partnership with other stakeholders;
(e) any Government Policy Statement on housing and urban development prepared under the Kāinga Ora–Homes and Communities Act 2019.
Chapter 4 – Future Development Strategy (FDS)

5. The DHBs seek for Objective O1 to be amended to specifically require long-term strategic planning, reflected in planning documents, to provide for infrastructure which meets the needs of relevant infrastructure users (e.g. the need for hospitals to be easily accessible 24 hours a day by emergency vehicles and people with mobility issues).

6. The DHBs also seek for the proposed NPS-UD policies to be amended to require FDSs to:

(a) set out how local authorities will both (Policy P1A):

   (i) provide sufficient social infrastructure capacity to enable people and communities to provide for their well-being and health and safety,

   (ii) achieve quality urban environments on social infrastructure land; and

   (iii) demonstrate how local authorities will provide development infrastructure which meets the needs of relevant infrastructure users;

(b) recognise that sometimes social infrastructure (and development and other infrastructure) has a functional or operational need to locate in areas where residential or business activity should be avoided (Policy P1D(a)); and

(c) identify:

   (i) broad locations for social infrastructure land (Policy P1D(c));

   (ii) the social infrastructure needed to support growth (Policy P1D(e));

   (iii) how to provide for social infrastructure land (Policy P1D(f));

   (iv) hapū and whānau aspirations for social infrastructure to be developed on whenua Māori within their rohe (Policy P1D(g)); and
(v) processes for working with social infrastructure providers to implement the FDS (Policy P1D(h)(iii)).

Amendments sought

O1: To ensure long-term strategic planning, reflected in planning documents, provides for:

(a) integrated land use and infrastructure
(b) infrastructure which meets the needs of relevant infrastructure users
(c) quality urban environments.

P1A: Local authorities must, every three years, prepare or update a Future Development Strategy (FDS). An FDS is to demonstrate, for the medium and long term, how the local authority will:

(a) achieve quality urban environments in its existing and future urban areas and residential development capacity bottom lines for residential land
(b) meet residential development capacity bottom lines for residential land
(c) provide sufficient development capacity to meet likely demand for business land
(d) allocate development capacity across existing residential and business land and future urban areas land
(e) provide sufficient social infrastructure capacity to enable people and communities to provide for their well-being and health and safety.
(f) provide development infrastructure which meets the needs of relevant infrastructure users (e.g. the need for hospitals to be easily accessible 24 hours a day by emergency vehicles and people with mobility issues).

P1C: Every FDS must be informed by:

... 

(d) the long-term plans and infrastructure strategies required under the Local Government Act 2002 and any other relevant strategies, plans and documents
(e) iwi and hapū resource management issues of concern/significance for the urban environment, including any other relevant strategies, plans and documents
(f) other relevant strategies, plans and documents.
P1D: Every FDS must identify:

(a) areas where evidence shows that:
   i. residential and business activities urban development must be avoided
   ii. development infrastructure, other infrastructure or social infrastructure should only be located if there is a functional or operational need to do so

(b) future infrastructure corridors/locations for development infrastructure and other infrastructure

(c) broad locations for long-term feasible development capacity for residential land and business land and social infrastructure land development capacity

(d) broad locations for residential intensification that contributes to quality urban environments (as described in O2)

(e) the development infrastructure, social infrastructure and other infrastructure needed to support growth and meet the needs of relevant infrastructure users

(f) how to provide for business land and social infrastructure land

(g) how hapū and whānau aspirations for urban development on whenua Māori within their rohe will be taken into account

(h) how the strategy will be implemented. This must include:

   i. estimates of local authority contributions to development infrastructure funding, and the indicative timing and sequencing
   ii. financing gaps or other risks to the delivery of development infrastructure needs for the medium and long-term, and options for resolving this
   iii. processes for working with landowners, developers, social infrastructure providers and other infrastructure providers to implement the FDS.

P1E: In addition to the policies P10A-P10C, when local authorities are developing or updating FDSs for a major urban centre they must:

(a) engage on their FDS with neighbouring local authorities where there are significant connections between development infrastructure, other infrastructure, social infrastructure or communities
(b) work with relevant central government agencies and other social infrastructure providers

…

Chapter 5 – Making room for growth

Describing quality urban environments

7. The DHBs seek for proposed Objective O2 to be amended to refer to:
   (a) “health and safety”; and
   (b) homes that meet people’s “needs”.

8. The DHBs also seek for O2 to be amended to identify that a quality urban environment:
   (a) offers transport choices; and
   (b) provides infrastructure which meets the needs of relevant infrastructure users.

Amendments sought

O2: To enable quality urban environments that make it possible for all people, whānau, communities and future generations to provide for their wellbeing and health and safety, including by:

(a) offering people access to a choice of homes that meet their demands needs, jobs, opportunities for social interaction, high-quality diverse social infrastructure, services and open space, and transport choices

(b) providing businesses with economies of scale, with access to many consumers, suppliers, skilled people and sources of innovation

(c) providing development infrastructure, and facilitating the provision of other infrastructure, which meets the needs of relevant infrastructure users

(d) using land, energy, and infrastructure efficiently

(e) responding to changing needs and conditions.
P2A: When making planning decisions that affect urban development, and the way in which development capacity is provided, local authorities must, to the extent relevant, have particular regard to:

(a) enabling a range of dwelling types and locations, working environments, social infrastructure and business locations land
(b) limiting as much as possible adverse impacts on the competitive operation of land and development markets.

When making decisions on consent applications decisions that affect urban development, and or the way and or rate at which development capacity is taken up, decision-makers must, to the extent relevant, have regard to the need, consistent with this NPS, to:

(c) provide a range of dwelling types and locations, working environments, social infrastructure and business locations land
(d) limit as much as possible adverse impacts on the competitive operation of land and development markets.

P2B: When making or updating policies, plans and strategies, local authorities must have particular regard to:

(a) the positive impacts of urban development residential, business and social infrastructure activities to contribute to a quality urban environment as described in O1 O2
(b) the benefits and costs of urban development such activities at national, inter-regional, regional and district scale, as well as locally.

When making decisions on consent applications decisions, decision-makers must have regard to:

(c) the positive impacts of residential, business and social infrastructure activities in contributing to a quality urban environment as described in O1 O2
(d) the benefits and costs of urban development such activities at national, inter-regional, regional and district scale, as well as locally.
Enabling opportunities for development

9. The DHBs seek for Objective O5 and Policies P4A to P4C and P4G to be amended (as set out below) to require local authorities to:

(a) ensure that their plans enable sufficient social infrastructure capacity, in terms of location and extent of land; and

(b) provide for infrastructure which meets the needs of relevant infrastructure users.

Amendments sought

O5: To ensure local authority policies, plans and strategies enable enough opportunities for development to meet diverse demands for housing and business land, provide sufficient, and appropriately located, social infrastructure land, and provide for development and other infrastructure, which meets the needs of relevant infrastructure users.

P4A: Local authorities must ensure at all times that their plans enable, at least enough:

(a) 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); and

(b) social infrastructure capacity (in terms of location and extent of land); over the short, medium and long term.

A local authority meets these obligations by ensuring:

(c) Short term – that the development capacity and social infrastructure capacity is enabled by resource management plans and serviced with appropriate development infrastructure

(d) Medium term – that the development capacity and social infrastructure capacity is enabled by resource management plans and either:

i. is serviced with appropriate development infrastructure, or
ii. the funding for the development infrastructure required to service that development capacity and meet the needs of relevant infrastructure users must be identified in a Long Term Plan required under the Local Government Act

(e) Long term – that:

iii. the development capacity and social infrastructure capacity is identified in all relevant plans and strategies (including the FDS)

iv. the development infrastructure required to service that development capacity and social infrastructure capacity and meet the needs of relevant infrastructure users it is identified in the relevant Infrastructure Strategy required under the Local Government Act 2002.

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

P4C: In providing development capacity and social infrastructure capacity, a local authority must be satisfied that:

(a) the other infrastructure required to support urban development is, or is likely to be, available

(b) the development infrastructure provided, or to be provided, and other infrastructure available or likely to be available, meets the needs of relevant infrastructure users (e.g. the need for hospitals to be easily accessible 24 hours a day by emergency vehicles and people with mobility issues).

P4G: If an HBA or any other evidence or monitoring indicates that there is inadequate development capacity or social infrastructure capacity, the local authority must:

(a) consider all options (under any legislation) to enable the development of appropriate residential, business and social infrastructure activities, such as integrated and co-ordinated consenting processes

(b) increase development capacity or social infrastructure capacity by changing policy statements and plans, including changes to zoning, objectives, policies, rules, and spatial layers precincts, and development areas and the local
authority’s designations that apply in existing urban environments to residential land, business land, social infrastructure land and in greenfield areas
(c) if the inadequacy relates to the long term, update its FDS
(d) if the inadequacy relates to a lack of appropriate development infrastructure to meet the needs of relevant infrastructure users, consider all options for providing appropriate development infrastructure
(e) consider all other options for increasing development capacity or social infrastructure capacity.

Ensuring plan content provides for expected levels of development

10. The DHBs seek for:

(a) proposed Objective O6 and Policy P5D to be amended (as set out below) to require local authorities to make decisions on social infrastructure that are based on evidence and analysis; and

(b) proposed Policy P5D to be amended to require local authorities to analyse whether proposed development and other infrastructure will be appropriate for the needs of the relevant infrastructure users.

Amendments sought

O6: To ensure local authorities:

(a) make decisions on urban development capacity and social infrastructure capacity on the best available evidence
(b) respond promptly to evidence about changing demands for residential, housing and business and social infrastructure land
(c) identify the evidence on which decisions about urban development capacity and social infrastructure capacity are made.

P5D: When making planning decisions that affect the development of urban environments, local authorities are to 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, residential, business and social infrastructure activities and their contribution to achieving a quality urban environment (as described in Objective 12)

(c) an assessment of the impact of different urban development options on providing enough development capacity for residential and business land and social infrastructure capacity

(d) an assessment of regulatory and non-regulatory options for contributing to a quality urban environment and providing enough development capacity and social infrastructure capacity

(e) an analysis of consistency with the FDS

(f) analysis of whether existing and proposed development infrastructure and other infrastructure will be appropriate to meet the needs of relevant infrastructure users

(g) demonstration that they have been informed by relevant evidence and monitoring required under this NPS.

Providing for intensification

11. The DHBs seek changes to proposed Policies P6A and P6B so that, before deciding to enable intensification, local authorities are required to consider whether:

   (a) social infrastructure is easily accessible by active and public transport networks;

   (b) the proposed intensification would ensure the efficient use of existing social infrastructure land and existing social infrastructure; and

   (c) existing and proposed infrastructure will meet the needs of relevant infrastructure users.

Amendments sought

P6A: Enable higher-density development, especially in areas where there are more than one of the following:

   (a) proximity to many employment opportunities
(b) urban amenities, social infrastructure is and services are easily accessible by existing or planned active transport and public transport networks

(c) high demand for housing, employment or social infrastructure

(d) efficient best use can be made of existing or planned development infrastructure, other infrastructure, social infrastructure, and other services and facilities and that infrastructure will meet the needs of relevant infrastructure users.

P6B: Regional councils must include the following objective into their regional policy statements:

*To enable residential intensification that ensures the efficient use of existing urban land and infrastructure, services and facilities*

**Providing for further greenfield development**

12. The DHBs support in principle the inclusion of a policy providing for greenfields development out-of-sequence or in locations not currently identified for development.

13. However, they seek for the objectives and policies providing for such greenfield development to:

   (a) recognise that sometimes social infrastructure (and development and other infrastructure) has a functional or operational need to locate in areas where residential and business activity should be avoided;

   (b) require decision-makers to consider whether social infrastructure is likely to be provided within an appropriate timeframe; and

   (c) consider whether the infrastructure likely to be provided will meet the needs of relevant infrastructure users.

14. Some suggested changes to the example policy are set out below.
**Amendments sought**

**Example policy**

When considering a plan change that enables urban development residential, business or social infrastructure activities that are not otherwise enabled in the relevant regional and district plans, local authorities must provide for urban development such activities when all of the following apply:

(a) Development enabled by the plan change would contribute to a quality urban environment as described in O2 including access to transport choice.

(b) Development enabled by the plan change would not have an adverse effect on protected areas or areas identified in the FDS as areas where:
   - residential or business activities urban development must be avoided.
   - development infrastructure, other infrastructure or social infrastructure should only be located if there is a functional or operational need to do so.

(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 can practicably be are appropriately managed within and adjacent to the location or locations that are the subject of the plan change.

(e) Development infrastructure and other infrastructure to enable the long-term development of the land and meet the needs of relevant infrastructure users, and social infrastructure to provide for people and communities' wellbeing and health and safety, is likely to can be provided within an appropriate timeframe.

**Removing minimum car parking requirements**

15. The DHBs oppose the proposals to prohibit, or constrain, the use of minimum car parking requirements.

**Amendments sought**

Delete P7A Options 1-3.
More directive intervention to enable quality urban development

16. The DHBs are concerned about the potential unintended and adverse consequences for health and wellbeing if the NPS-UD seeks to apply more directive intervention at a national level to rules that are more appropriately considered in the context of the relevant district plan provisions.

Amendments sought

The DHBs oppose the NPS-UD providing more directive national-level intervention as proposed at pages 42-45 of the Discussion Document.

Chapter 6 – Evidence for good decision-making - using market information to make good decisions

17. The DHBs seek for proposed Policies P8B and P8D to be amended (as set out below) to require local authorities to monitor and assess the provision of social infrastructure and social infrastructure land.

Amendments sought

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, and the provision of social infrastructure:

(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
(d) the housing price to cost ratio
(e) indicators of housing affordability
(f) the available data on business land and social infrastructure land.

Local authorities must publish the results of their monitoring of indicators at least annually.
P8D: Local authorities must assess demand for housing, and business and social infrastructure land, and the development capacity and social infrastructure capacity required to meet that demand in the short, medium and long term.

Chapter 7 – Engagement on urban planning and Appendix 3: Policies on Housing and Business Development Capacity Assessments

18. The DHBs seek for proposed Objective O10, and proposed Policies P9B, P10A, P10B, AP4 and AP17 to be amended (as set out below) to require local authorities to:

(a) identify and take into account hapū and whānau aspirations for social infrastructure;

(b) coordinate with other local authorities and other social infrastructure providers in the provision of social infrastructure and social infrastructure capacity; and

(c) consider whether existing, and proposed, infrastructure meets the needs of relevant infrastructure users.

Amendments sought

P9B: When preparing a proposed policy statement, plan or strategy that affects how development capacity and social infrastructure capacity is provided for in urban environments, every local authority must:

(a) provide hapū and whānau with opportunities to identify their aspirations for the urban development of residential, business or social infrastructure activities on whenua Māori within their rohe

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

O10: To ensure decisions within local authorities and across local authority boundaries are coordinated and aligned with the provision of development infrastructure, and other infrastructure and social infrastructure.
P10A: Local authorities that share jurisdiction over an urban environment are strongly encouraged to work together to implement this NPS, having particular regard to the need to cooperate and agree on:

(a) the provision and location of feasible development capacity and social infrastructure capacity required by it; and
(b) principles and practices for partnering with iwi and hapū.

P10B: Local authorities must work with providers of development infrastructure, and other infrastructure and social infrastructure to:

(a) achieve integrated land use and infrastructure planning
(b) provide infrastructure which meets the needs of relevant infrastructure users (e.g. the need for hospitals to be easily accessible 24 hours a day by emergency vehicles and people with mobility issues)
(c) implement policies P1A-P1E, P4A and P4C.

AP4: Every HBA must estimate development capacity for the short, medium and long term for greenfield and existing urban areas according to the table below:

<table>
<thead>
<tr>
<th>Time</th>
<th>Plan-enabled capacity</th>
<th>Supported by development infrastructure (Development capacity)</th>
<th>Feasible</th>
<th>Likely to be taken up</th>
</tr>
</thead>
<tbody>
<tr>
<td>Short term</td>
<td>The cumulative effect of all zoning, objectives, policies, rules, spatial layers and existing designations in operative plans for permitted, controlled or restricted discretionary activities</td>
<td>The actual development infrastructure in place and whether it meets the needs of relevant infrastructure users</td>
<td>Commercially viable to a developer based on the current relationship between costs and revenues</td>
<td>Likely to be built, using as a starting point information about past development in building consent data</td>
</tr>
</tbody>
</table>

Note: The cumulative effect of all zoning, objectives, policies, rules, spatial layers and existing designations in operative plans for permitted, controlled or restricted discretionary activities.
<table>
<thead>
<tr>
<th>Time</th>
<th>Plan-enabled capacity</th>
<th>Supported by development infrastructure</th>
<th>Feasible</th>
<th>Likely to be taken up</th>
</tr>
</thead>
<tbody>
<tr>
<td>Medium term (3-10 years)</td>
<td>As above plus additional development capacity in a notified plan</td>
<td>As above plus additional development infrastructure funded in an LTP and/or funded or financed by an external party and whether that proposed development infrastructure would meet the needs of relevant infrastructure users</td>
<td>Commercially feasible to develop based, as a starting point, on the current relationship between costs and revenues</td>
<td></td>
</tr>
<tr>
<td>Long term (10-30 years)</td>
<td>As above plus additional capacity identified in an FDS</td>
<td>As above plus additional development infrastructure identified in an infrastructure strategy prepared under the Local Government Act 2002 and whether that proposed development infrastructure would meet the needs of relevant infrastructure users</td>
<td>Commercially feasible to develop based, as a starting point, on the current relationship between costs and revenues</td>
<td></td>
</tr>
</tbody>
</table>
AP17: In carrying out the HBA, local authorities must seek and use input from the property development sector, (including major landowners), social infrastructure providers (including social housing providers where relevant), requiring authorities, and the providers of development infrastructure and other infrastructure.