Submission on Proposed National Policy Statement on Urban Development

I am a resource management planner and consultant with 25 years’ experience. I do not have time to answer all of the questions but I would like to make a few points:

1. The NPS should make it clear that significant areas under s 6(c) of the RMA and Policy 11 of the NZCPS will be ‘no go’ areas for urban development, including transport corridors, and areas of Highly Productive Land as defined in that NPS. I attach my submission on that proposed NPS which expands on the latter.

2. The NPS should not mandate height for high landscape value areas, including in the coastal environment, near maraes, including cultural landscapes. I specialise mostly in natural resource planning but I have had experience with a case involving an 8 storey building that was to step up an escarpment, directly adjoining an ONFL. There was multiple litigation over 10 years, in which the outcome was constrained by the rolling method of defining height in the district plan. It is a great disappointment to me that the definition adopted in the National Planning Standards is the rolling height method. In an obiter comment, the Court noted the limitation of this definition.

The height of the building was considered to offend cultural values, because it obscured views from the marae of features given statutory recognition under a Treaty Settlement. Another building in the same locality has almost completely obscured another such feature.

This is an important method to incorporate matters of importance to Maori.

3. Greenfield urban development should not offend the NPS Highly Productive Land.