Planning for successful cities - a proposed National Policy Statement on Urban Development

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Submitter Type: City/district council
Source: Web Form
Overall Position: Support

Clause
Question 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?
Position
Yes
Notes
Strategic and deliberate planning needs to occur for future growth to ensure necessary infrastructure is provided in tandem with development. As well as improved environmental outcomes are met, such as energy efficiency.

Clause
Are there other tools under the RMA, other legislation or non-statutory tools that would be more effective in achieving a quality urban environment and making room for growth?
Notes
Yes - Whakatane district has a population of 35,000. While growth appears to be slow, there is increasing demand for accommodation. Going forward the district is expecting demand to increase. However, it is unlikely to be at the same level experienced in adjoining districts, such as Papamoa in Tauranga.

Clause
Question 2. Do you support the approach of targeting the most directive policies to our largest and fastest growing urban environments? Why/why not?
Position
Somewhat
Notes
Major urban centers (MUC) are facing the most immediate pressure. However, the development flow on effect to surrounding districts should not be ignored and best practice across all Councils should be fostered.

Clause
Do you support the approach used to determine which local authorities are categorised as major urban centres? Why/why not?
Notes
Yes - Whakatane district has a population of 35,000. While growth appears to be slow, there is increasing demand for accommodation. Going forward the district is expecting demand to increase. However, it is unlikely to be at the same level experienced in Tauranga and Western Bay of Plenty.

Clause
Can you suggest any alternative approaches for targeting the policies in the NPS-UD?
Notes
No comment

Clause
Question 3. Do you support the proposed changes to FDSs overall? If not, what would you suggest doing differently?
Position
Yes
Clause
Do you support the approach of only requiring major urban centres to undertake an FDS? Would there be benefits of requiring other local authorities to undertake a strategic planning process?

Notes
By undertaking a robust assessment of future development sites, a more strategic picture if supply/demand and need will emerge. This will enable Council to better engage with a range of infrastructure providers and the community, to better integrated growth and manage environmental effects. In addition, Whakatane District is close to Tauranga and Western Bay of Plenty (both are major urban centers). Understanding where future growth is expected may help Whakatane District to predict and manage any ‘overflow’ effects on out district.

Clause
What impact will the proposed timing of the FDS have on statutory and other planning processes? In what ways could the timing be improved?

Notes
No comment

Clause
Question 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?

Position
Yes

Notes
No comment

Clause
Do you support the features of a quality urban environment stated in draft objective O2? Why/why not? (see discussion document, page 26)

Notes
Objective 2 promotes a vibrant economy that supports a range of residential, business, educational and sustainable parameters. The document proposes a preamble, which would link the urban objectives to a broad range of overlapping environmental, natural hazards and cultural issues. Given that the preamble has limited weight, if these are matters of importance, including them within a relevant objective seems appropriate.

Clause
What impacts do you think the draft objectives O2-O3 and policies P2A-P2B will have on decision-making (see discussion document, page 26)?

Notes
No comment

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

Position
Yes

Notes
Providing a definition on amenity, removes uncertainty as to what is intended by the document and enables councils to be more consistent in the application of “amenity values”.

Clause
Do you think these proposals will help to address the use of amenity to protect the status quo?

Notes
The proposed definition recognises that ‘amenity’ need not be static and that values can change over time. This would suggest that there is flexibility for communities to re-interpret what amenity values are important and any changes that might occur over time.

Clause
Can you identify any negative consequences that might result from the proposed objective and policies on amenity?

Notes
No comment
Clause
Can you suggest alternative ways to address urban amenity through a national policy statement?
Notes
No comment

Clause
Question 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? Why/why not? (see questions A1 - A5 at the end of the form for more questions on policies for Housing and Business Development Capacity Assessments)
Position
Yes
Notes
Identifying future growth opportunities that are feasible and likely to be taken up requires a broader understanding of community needs, changes in sector demands, infrastructure capacity and the motivation of private developers. Future growth options that are adaptable will help communities to evolve as per current and future demand - not historical.

Clause
Question 7. Do you support proposals requiring objectives, policies, rules, and assessment criteria to enable the development anticipated by the zone description? Why/why not?
Position
Somewhat
Notes
While this section applies to major urban centers, the implication to assess how objectives, policies and rules are affecting expected development and that the planning outcome sought is being achieved is reasonable.

Clause
Do you think requiring zone descriptions in district plans will be useful in planning documents for articulating what outcomes communities can expect for their urban environment? Why/why not?
Notes
Where a zone is being included in a district plan to achieve a particular purpose (such as a character, density, mixed use) a description to clarify its intention could be a reasonable expectation.

Clause
Do you think that amenity values should be articulated in this zone description? Why/why not?
Notes
No comment

Clause
Question 8. Do you support policies to enable intensification in the locations where its benefits can best be achieved? Why/why not? (for more detail on the timing for these policies see discussion document, page 53)
Position
Yes
Notes
Providing for urban intensification in areas that are close to employment, education and business centers is likely to be a change in provincial towns that occurs over time. It will be important to ensure necessary facilities and infrastructure are provided to support intensification. Building community buy-in as to why such development might be needed will be important, particularly if the change is from low rise to medium rise townscapes. This could be indicated and promoted through a future development strategy and the long term/ annual plan processes.

Clause
What impact will these policies have on achieving higher densities in urban environments?
Notes
No comment

Clause
What option/s do you prefer for prescribing locations for intensification in major urban centres? Why?
Position
Option 1 (the descriptive approach)
Notes
In major urban centers intensification is likely to be required across entire suburbs. However, in all urban environments the need for intensification may be slower and site specific. It is appropriate for an overarching intensification aim to be stated. However, communities should be able to debate and identify the size and scale that is appropriate within their towns.
Clause
If a prescriptive requirement is used, how should the density requirement be stated? Please provide a suggestion below (for example, 80 dwellings per hectare, or a minimum floor area per hectare).
Notes
No comment

Clause
What impact will directly inserting the policy to support intensification in particular locations through consenting decisions have?
Notes
No comment

Clause
Question 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?
Position
Yes
Notes
Overtime new development sites may become available to meet changing demands within the community. Individuals should be able to request a plan change for a site, if it meets the intention of a plan.

Clause
How could the example policy better enable quality urban development in greenfield areas (see discussion document, page 37)?
Notes
No comment

Clause
Are the criteria sufficiently robust to manage environmental effects to ensure a quality urban environment, while providing for this type of development? (see example policy in discussion document, page 37)
Notes
No comment

Clause
To what extent should developers be required to meet the costs of development, including the costs of infrastructure and wider impacts on network infrastructure, and environmental and social costs (recognising that these are likely to be passed on to future homeowners/beneficiaries of the development)? What impacts will this have on the uptake of development opportunities?
Notes
No comment

Clause
What improvements could be made to this policy to make development more responsive to demand in suitable locations beyond areas already identified for urban development?
Notes
No comment

Clause
Question 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?
Notes
Whakatane District Council is an "all urban environment" and this section does not apply

Clause
Which proposed option could best contribute to achieving quality urban environments?
Notes
No comment

Clause
What would be the impact of removing car park minimums in just high- and medium- density, commercial, residential and mixed use areas, compared with all areas of a major urban centre?
Notes
No comment
Clause
How would the 18 month implementation timeframe impact on your planning processes?
Notes
No comment

Clause
What support should be considered to assist local authorities when removing the requirement to provide car parking to ensure the ongoing management of car parking resources?
Notes
No comment

Clause
Question 11. Do you think that central government should consider more directive intervention in local authority plans?
Position
No
Notes
No comment

Clause
Which rules (or types of rules) are unnecessarily constraining urban development?
Notes
No comment

Clause
Can you identify provisions that are enabling higher density urban development in local authority plans that could be provided for either nationally or in particular zones or areas?
Notes
No comment

Clause
Should a minimum level of development for an individual site be provided across urban areas (for example, making up to three storeys of development a permitted activity across all residential zones)?
Notes
No comment

Clause
Given the potential interactions with the range of rules that may exist within any given zone, how could the intent of more directive approaches be achieved?
Notes
No comment

Clause
Question 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?
Position
Somewhat
Notes
Most Councils will already be monitoring (to varying degrees) market indicators to help them understand their community, current and future needs. Up to date monitoring of housing market changes will be necessary to inform urban development and future growth. However, this objective is likely to result in a significant change in the frequency local authorities monitor market based information. Quarterly monitoring might be too onerous for all urban environments to undertake.

Clause
Question 13. Do you support inclusion of policies to improve how local government works with iwi, hapū and whānau to reflect their values and interests in urban planning? Why/why not?
Position
Yes
Notes
This objective and policies recognise that collaborative planning between Council and iwi should be an integral part of any planning process. However, explicitly requiring engagement with Mana Whakahono a Rohe will better legitimise this process.
Clause
Do you think the proposals are an appropriate way to ensure urban development occurs in a way that takes into account iwi and hapū concerns?
Notes
No comment

Clause
How do you think local authorities should be directed to engage with Māori who do not hold mana whenua over the urban environment they are currently living in?
Notes
No comment

Clause
What impacts do you think the proposed NPS will have on iwi, hapū and Māori?
Notes
No comment

Clause
Question 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/hapū?
Position
Yes
Notes
No comment

Clause
Question 15. What impact will the proposed timing for implementation of policies have?
Notes
No comment

Clause
Question 16. What kind of guidance or support do you think would help with the successful implementation of the proposed NPS-UD?
Notes
No comment

Clause
Question 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 below and include any suggestions you have for addressing these issues.
Notes
No comment

Clause
Question 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?
Notes
No comment

Clause
Question 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?
Notes
No comment

Clause
Question A2. What do you anticipate the impact of the proposed polices (and any related changes) would be on planning and urban outcomes?
Notes
No comment
Clause
Question 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)
Notes
No comment

Clause
Question A4. How could these policies place a greater emphasis on ensuring enough development capacity at affordable prices?
Notes
No comment

Clause
Question A5. Do you support the approach of targeting the HBA requirements only to major urban centres? Why/why not?
Notes
No comment