Submission from: Central Otago District Council

On: National Policy Statement – Urban Development

Please find below our feedback (in italics) under each of the relevant questions raised in the discussion document.

Questions

2 Do you support the approach of targeting the most directive policies to our largest and fastest growing urban environments? Why/why not? – Do you support the approach used to determine which local authorities are categorised as major urban centres? Why/why not? – Can you suggest any alternative approaches for targeting the policies in the NPS-UD?

Council supports this approach, providing the provisions around cross-boundary considerations are improved.

3 Do you support the proposed changes to future development strategies (FDSs) overall? If not, what would you suggest doing differently? – 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? – What impact will the proposed timing of the FDS have on statutory and other planning processes? In what way could the timing be improved?

Council supports the intent of the Future Development Strategy (FDS), however is concerned that it may not align with the timing of preparing a LTP, Infrastructure Strategy or similar. This could be particularly difficult for a neighbouring council that is not required to produce a FDS but is impacted by their neighbouring council’s FDS. Where this arises, and is likely to impact on our growth planning, this needs to be taken into consideration. For this reason, Council supports Policy P1E (a).

Council is unclear as to how funding gaps identified through a FDS will be provided for and by when.

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? – Do you support the features of a quality urban environment stated in draft objective O2? Why/why not? – What impacts do you think the draft objectives O2–O3 and policies P2A–P2B will have on your decision-making?

The inclusion of “jobs” in O2 a) is less relevant where there is a higher proportion of commuters. There is no proximity consideration, let alone the relationship to transport modes to support commuting.

Council is concerned that the matters under O2 b) do not relate to the purpose of an urban environment. Suggest the wording be amended to “access to consumer markets, suppliers, labour markets and...”

Council would like to see O3 strengthened to include urban degradation as a result of new development elsewhere.

The inclusion in P2A b) and d) to consider “the competitive operation of land and development markets” sits largely outside of Council’s control and does not seem to be a relevant consideration for planning decisions. If the NPS-UD wishes to try and regulate this factor, then other mechanisms will be required. Council can only have
some influence on the supply of zoned land, but cannot require this to be taken up under current legislation.

5 Do you support the inclusion of proposals to clarify that amenity values are diverse and change over time? Why/why not? – Do you think these proposals will help to address the use of amenity to protect the status quo? – Can you identify any negative consequences that might result from the proposed objective and policies on amenity? – Can you suggest alternative ways to address urban amenity through a national policy statement?

Council does not agree that lower socio-economic groups are under-represented or absent in planning processes. We would however, note that they can be less well resourced to take on planning arguments that progress through hearings and court processes.

The provisions contained under O4 require substantial strengthening, otherwise should be removed as they currently add no value to what is already defined in the RMA.

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?

The Council wishes to highlight that the inclusion of “price” in the consideration of development capacity over short, medium and long term is totally irrelevant and again outside of our control, particularly beyond the short term. Price is driven by the market and economic conditions of the time. While Council can zone enough land for development, it cannot for take up of this land and it would be ambitious to think that we would be able to drive price down in a competitive market economy model that we operate in.

7 Do you support proposals requiring objectives, policies, rules, and assessment criteria to enable the development anticipated by the zone description? Why/why not? – 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? – Do you think that amenity values should be articulated in this zone description? Why/why not?

Council considers that the zone descriptions will essentially be redundant if we are required to use the National Planning Standards zones. These can be cross referenced if required.

The monitoring to indicate the level of unrealised development capacity will also need to extend to neighbouring councils to gauge the level of “out of district” provision of this capacity. It will also need to acknowledge the “out of zone” activities that may also be occurring. Again, the importance of cross boundary considerations of this matter will be important.

8 Do you support policies to enable intensification in the locations where its benefits can best be achieved? Why/why not? – What impact will these policies have on achieving higher densities in urban environments? – What option/s do you prefer for prescribing locations for intensification in major urban centres? Why? – If a prescriptive requirement is used, how should the density requirements be stated? (For example, 80 dwellings per hectare or a minimum floor area per hectare). – What impact will directly inserting the policy to support intensification in particular locations through consenting decisions have?
Council supports the intent of the intensification provisions, however would prefer a longer timeframe than 18 months to notify plan changes to give effect to the NPS-UD.

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? – How could the example policy better enable quality urban development in greenfield areas? – Are the criteria in the example policy sufficiently robust to manage environmental effects ensure a quality urban environment, while providing for this type of development? – 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 onto future homeowners and beneficiaries of the development)? What impact will this have on the uptake of development opportunities? – 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?

This policy appears to favour urban development over other factors and could result in councils having to use more resources to combat inappropriate greenfield developments that do not align with our identified long term growth areas. Council supports the intent of the policy and further requests that the factors set out in the example policy be strengthened to set greater limits on when greenfield development could occur and matters that could be used to reject a private plan change request. Further provision should be made for linking to an already adopted Spatial Plan.

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?

The Council supports in general this requirement and notes that data on business/industrial land take up through building/resource consents could also be included. There may also be other metrics to record business/industrial land prices/GFA rental costs, etc.

The housing price to cost ratio seems to be unclear and not relevant.

Requiring Council to assess demand beyond the short term is ambitious and can only be a best guess based on population projections. We can provide for expected growth over the longer term, but many other factors can influence this, largely economic.

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? Why/why not?

The provisions around collaboration and cooperation set out in P10C need to be broadened to include neighbouring councils as the Housing and Business Development Capacity Assessment and Future Development Strategy will often cross boundaries and influence development in districts outside the immediate jurisdiction of the major urban centre, particularly in the case of Queenstown. These assessments and strategies cannot be prepared in isolation of other districts that provide spillover or complementary development opportunities.