8 October 2019

Proposed National Policy Statement on Urban Development
Ministry for the Environment

nps-udconsultation@mfe.govt.nz

Dear Sir/Madam

Environment Canterbury submission on Planning for successful cities: A discussion document on a proposed National Policy Statement on Urban Development

Thank you for the opportunity to comment on Planning for successful cities: A discussion document on a proposed National Policy Statement on Urban Development (NPS-UD).

Environment Canterbury provides comment on the proposed NPS-UD in the context of our roles and responsibilities as a regional council.

We wish to acknowledge the extensive work that has been undertaken by the Ministry for the Environment and the Ministry of Housing and Urban Development on the proposed NPS-UD. We support the overall purpose and direction of the proposals, including its intention to broaden the focus of the existing National Policy Statement on Urban Development Capacity.

Our full submission on the proposed NPS-UD is enclosed.

For all enquires please contact:

Yours sincerely

Encl: Environment Canterbury submission on Planning for successful cities: A discussion document on a proposed National Policy Statement on Urban Development
Overview

1. Environment Canterbury welcomes the opportunity to comment on Planning for successful cities: A discussion document on a proposed National Policy Statement on Urban Development (NPS-UD). We provide this submission in the context of our roles and responsibilities as a regional council, particularly those under the Resource Management Act 1991 (RMA), Local Government Act 2002 (LGA) and Land Transport Management Act 2003 (LTMA).

About Environment Canterbury

2. Environment Canterbury is the regional council for the largest geographical region and second most populous region in New Zealand. Our region encompasses a number of key cities and towns that support diverse urban environments and communities. Greater Christchurch is the largest urban area in the region, supporting around 80% of the regional population and 40% of the South Island population.

3. Environment Canterbury is a member of the Greater Christchurch Partnership (GCP), a voluntary partnership with Christchurch City Council, Selwyn and Waimakariri District Councils, Te Rūnanga o Ngāi Tahu and the Canterbury District Health Board, with non-voting members including the NZ Transport Agency, Regenerate Christchurch and the Department of the Prime Minister and Cabinet.

4. A core responsibility of the GCP relates to the implementation of the Greater Christchurch Urban Development Strategy (UDS), which promotes an integrated and intergenerational approach to planning for urban development in Greater Christchurch. The UDS seeks to ensure that development is managed in a manner that protects environments, improves transport connections, creates liveable areas and sustainably manages population growth.

5. In July 2019, the GCP completed a review of the settlement pattern arrangements for Greater Christchurch as part of satisfying the requirements of the National Policy Statement on Urban Development Capacity (NPS-UDC) for councils with jurisdiction over a high growth urban area to produce a Future Development Strategy (FDS). You can find out more about the Greater Christchurch FDS at the following link: http://greaterchristchurch.org.nz/ourspace/

6. At the wider regional level, Environment Canterbury also works in close collaboration with the ten territorial authorities in the region via the Canterbury Mayoral Forum and its sub-forums.
Key submission points

7. Environment Canterbury supports the overall purpose and direction of the NPS-UD, including the key new requirements related to enabling quality urban environments and making room for growth through changes to RMA plans. We endorse the intention of the NPS-UD to broaden the focus of the NPS-UDC beyond development capacity, to address other matters that contribute to well-functioning urban environments.

8. In this context, our responses to the questions posed in this discussion document, with a focus on those that are of most relevance to Environment Canterbury, are outlined in the following sections. Our key submission points are summarised as follows:

- We broadly support the changes to FDSs, including in so far as enabling quality urban environments, clarifying and strengthening the role of an FDS in the LGA and RMA planning framework, and showing how an FDS will be implemented.

- We broadly support the direction on achieving quality urban environments, but consider the features of such environments, as identified in the discussion document, are currently too narrow.

- We broadly support the direction on providing development capacity that is both feasible and likely to be taken up, but note that this could lead to planning for an oversupply of land given the continued requirement to add margins to demand.

- We support the direction for intensification to be enabled where its benefits will be best achieved, but consider that a blanket prescriptive approach to enabling higher densities is not appropriate given the differences in ‘centres’.

- We do not support the example policy that provides for plan changes for additional greenfield development that is out-of-sequence and/or in locations not currently identified for development.

- We broadly support the proposal to limit the ability to regulate minimum car parking requirements for developments, particularly where this encourages a mode shift to active and public transport.

- We broadly support the changes to how Housing and Business Development Capacity Assessments (HBAs) are undertaken.

- We support the direction for how councils should effectively work with iwi, hapū and whānau to reflect their values and interests in urban planning processes.

9. Environment Canterbury also recognises that the proposals in the NPS-UD represent just one component of the Urban Growth Agenda (UGA). While urban planning does play an important role in shaping our urban environments, we consider that the wider package of work being undertaken by central government as part of the UGA will be pivotal to improving the performance of our cities and towns. This is particularly relevant for major urban centres like Greater Christchurch.
10. Greater Christchurch does not currently face the same pressures as other major urban centres in terms of high and rapidly rising urban land prices and unaffordable housing, perhaps due to our established practice of strategic, integrated growth planning. However, we do face other challenges to implementing the vision and goals of our plans and strategies. This includes, for example, supporting the market to deliver higher density housing and providing a significantly improved public transport system.

11. We therefore strongly encourage central government to continue to progress its work under the UGA, especially in relation to building stronger partnerships with local government and iwi as a means of developing shared plans for addressing our cities' key challenges. This partnership approach has the opportunity to deliver significant positive changes to the overall performance of Greater Christchurch.

12. Environment Canterbury endorses the submission made by the GCP.
Future Development Strategy

Q3. *Do you support the proposed changes to FDSs overall? If not, what would you suggest doing differently?*

13. Environment Canterbury **broadly supports** the proposed changes to FDSs. We wish to make specific comment on the following elements of this part of the NPS-UD:
   - Enabling quality urban environments through an FDS
   - Clarifying and strengthening the role of an FDS
   - Supporting an FDS with an implementation plan

*Enabling quality urban environments through an FDS*

14. We support the stronger direction in the NPS-UD for an FDS to show how it will enable quality urban environments, rather than simply provide sufficient, feasible development capacity as currently required by the NPS-UDC.

15. The need for an FDS to demonstrate how quality urban environments will be achieved was highlighted during the consultation on Greater Christchurch's draft FDS, with a number of submissions received about how factors that contribute to quality urban environments were being addressed. This includes, for instance, providing for a range of housing types and transport options, and supporting vibrant centres where people can access different services and facilities.

16. However, the factors that should be considered in an FDS in so far as enabling quality urban environments should be high level and not delve into factors better considered through more local planning processes, such as local character and amenity values. This is particularly relevant for major urban centres like Greater Christchurch where an FDS focuses on strategic urban growth planning issues that need to be considered and coordinated across local authority boundaries.

17. It is also important to acknowledge that major urban centres like Greater Christchurch have different types of urban environments, such as a central city, suburban centres and satellite towns. These urban environments provide for the needs of residents and businesses in slightly different ways. The description of quality urban environments in the NPS-UD therefore needs to focus on key features and functions that should be present in all types of urban environments.

18. We make further comment on the description of quality urban environments in the NPS-UD in the Describing quality urban environments section below.

*Clarifying and strengthening the role of an FDS*

19. We also support the intention of the NPS-UD to clarify the role of an FDS in the wider RMA and LGA planning framework, and to strengthen its role in informing council's Long Term Plans (LTPs) and infrastructure strategies, regional land transport plans (RLTPs) required under the LTMA, and other relevant plans and strategies.
20. The new requirement for an FDS to be prepared or updated in time to inform council’s LTPs and infrastructure strategies, and RLTPs, should better enable councils to use an FDS as an input to these planning processes. In particular, it should enable a more integrated approach to long term growth planning across council’s relevant RMA, LGA and LTMA planning processes, with consistent growth assumptions used to inform each of these processes based on work undertaken for an FDS.

21. Based on the assumption that the NPS-UD will come into effect during the first half of 2020, it is not anticipated Environment Canterbury, through our work with the GCP, will have updated the Greater Christchurch FDS in time to inform our LTP 2021-24 or the RLTP 2021-31. This is due to timing and the suitability of updating a strategy adopted in July 2019. These upcoming processes will likely be informed by our currently adopted FDS.

Supporting an FDS with an implementation plan

22. We also support the stronger direction in the NPS-UD for an FDS to clearly show how its strategy will be implemented. This should help inform council’s subsequent RMA, LGA and LTMA planning processes, as well as discussions with central government about what support may be required to implement the strategy.

23. The Greater Christchurch FDS has a comprehensive implementation plan that covers a range of matters, such as addressing social and affordable housing needs, improving our planning tools and evidence base, directing specific changes to RMA plans, and identifying subsequent local planning processes where more detailed work would be undertaken. This plan recognises the limitations of an FDS and seeks to ensure subsequent processes help implement its strategy.

24. While the focus of policy P1D(h) of the NPS-UD is on identifying gaps in infrastructure provision, it is important to recognise that this is just one challenge facing councils in major urban centres in achieving good urban outcomes. For example, a key challenge facing Greater Christchurch relates to supporting the market to deliver higher density housing. Consideration of how the strategy in an FDS will be implemented should therefore not be solely limited to the delivery of infrastructure.

25. We would also expect to see central government identified in policy P1D(h) as a key partner for councils to work with to implement an FDS. Given the intention of the NPS-UD to strengthen FDSs and move towards integrated, spatial planning, we would hope that an FDS would provide the basis for stronger partnership between local and central government, and iwi, in the effort to drive better urban outcomes.
Making room for growth

Describing quality urban environments

Q4. 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?

26. Environment Canterbury broadly supports the direction in the NPS-UD on achieving
quality urban environments. We welcome the stronger emphasis on the importance of
ensuring planning decisions support not just growth, but good growth, and that these
decisions contribute to the achievement of quality urban environments both in existing
urban areas and in future greenfield developments.

27. While we broadly support the considerations set out in clauses a) to d) of objective O2
of the NPS-UD, the identified features of quality urban environments are in our view
too narrowly focussed. We note that the preamble to the NPS-UD would contain a
broader description and that the features of quality urban environments described in
objective O2 is intended to be ‘non-exhaustive’.

28. In this regard, we suggest that the NPS-UD should give greater recognition to the role
of urban design, accessibility and connectivity, access to green and open spaces, air
and water quality, historic and cultural heritage, biodiversity and other relevant natural
elements, alongside the features already identified.

29. The inclusion of such features in the objectives and policies would help ensure suitable
consideration is given to them, alongside the need to ensure sufficient development
capacity is available, supported by infrastructure, to provide for urban growth and meet
the needs of both current and future populations.

Enabling opportunities for development

Q6. 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?

30. Environment Canterbury broadly supports the direction to provide development
capacity that is both feasible and likely to be taken up. However, we also note that the
requirement to factor in take up when estimating development capacity, coupled with
the requirement to add margins on top of demand, may result in councils planning for
an oversupply of urban land. For some councils this would incur unwarranted costs
due to the need to plan for and service this surplus development capacity.

31. For this reason, we would support stronger direction in the NPS-UD for take up to be
considered alongside other relevant factors when carrying out an HBA. We would also
support a more flexible approach to the requirement to include additional margins of
development capacity over and above projected demand, which would enable councils
to better manage this issue depending on local circumstances.
32. It would also be helpful if policy P4A of the NPS-UD, or any related guidance referring to 'location', clarified that it is not the expectation that development capacity must be catered for in every location where there may be localised demand, especially when the demand can be appropriately provided for elsewhere within an urban environment. This particular issue arose during the hearing on the Greater Christchurch FDS.

33. We also assume the intention of the requirement to incorporate a bottom line without using the process in Schedule 1 of the RMA applies to both regional policy statements and district plans. As currently set out in policy P4E of the NPS-UD, the requirement to incorporate a bottom line without using the Schedule 1 process could be interpreted as only applying to district plans.

34. We also note the requirements in policy P4G of the NPS-UD for councils to respond where an HBA or “any other evidence or monitoring” (emphasis added) indicates there is inadequate development capacity. This could increase the burden on councils to respond to ad hoc evidence from private landowners and developers. Our preference would be for the existing wording in policy PC3 of the NPS-UDC to be retained, which refers specifically to evidence or monitoring obtained in accordance with the NPS.

Providing for intensification

Q8. Do you support policies to enable intensification in the locations where its benefits can best be achieved? Why/why not?

35. Environment Canterbury supports the direction in the NPS-UD for councils in major urban centres to enable intensification where its benefits can be best achieved.

36. The Greater Christchurch UDS, the Greater Christchurch FDS and the Canterbury Regional Policy Statement (CRPS) each recognise the important role of higher density development in supporting the needs of current and future populations, and for achieving a consolidated urban form in Greater Christchurch that reduces the need for expansion of peripheral areas and supports a well-functioning urban environment.

37. The CRPS directs intensification around the central city, key activity centres and neighbourhood centres, consistent with their scale and function, as well as core public transport routes, mixed use areas and suitable brownfield land. It also sets minimum residential density requirements specific to different locations, including greenfield areas in Selwyn and Waimakariri Districts, greenfield areas in Christchurch City and intensification opportunities in Christchurch City.

38. In this context, it is important to acknowledge that there are different types of urban environments in major urban centres like Greater Christchurch, such as a central city, suburban centres and satellite towns. We therefore consider that a policy in the NPS-UD that requires a specific minimum density to be applied to all 'centres', without appropriate consideration of local context, is inappropriate.

39. For Greater Christchurch, high density housing at 60 units per hectare is unlikely to be appropriate in smaller townships like Rangiora, Rolleston and Kaiapoi. It may also not
be appropriate in locations subject to development constraints, such as sea level rise, flooding, heritage and natural features. Densities should also take account of planned levels of infrastructure and be proportionate to the location’s connectivity and accessibility, particularly in relation to public transport services.

40. For these reasons, we do not support the prescriptive approach set out in Option 2 of the discussion document. To support the implementation of any such policy related to intensification, we also suggest it may be helpful to include a definition of ‘density’, either in the NPS-UD or the National Planning Standards.

Providing for further greenfield development

Q9. 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?

41. Environment Canterbury does not support the policy in the NPS-UD providing for plan changes for greenfield developments that are out-of-sequence and/or in locations not currently identified for development. We believe there is a tension in the NPS-UD between the emphasis on good strategic, integrated planning, which we support, and this proposed policy.

42. The GCP has worked collaboratively for over a decade on implementing a strategic approach to urban development in Greater Christchurch that provides for the long term needs of people and communities. This includes the development of the Greater Christchurch UDS in 2007, an update to this strategy in 2016, and the recently completed Greater Christchurch FDS in 2019. The UDS continues to provide the overall strategic direction for urban development in Greater Christchurch.

43. The settlement pattern approach outlined in the UDS was to be implemented through Proposed Change 1 to the CRPS (notified in 2007), with Map 1 identifying the extent of greenfield areas needed to support growth through to 2041. Following the earthquakes in 2010 and 2011, this settlement pattern was partially implemented through the Land Use Recovery Plan, and the insertion of Chapter 6 and Map A into the CRPS.

44. The Greater Christchurch FDS recently showed that the land within the Projected Infrastructure Boundary, as delineated in Map A, should provide enough development capacity in Greater Christchurch through to 2048 if higher residential densities and further intensification are enabled. The FDS included an action for Environment Canterbury to prepare a change to the CRPS that would allow the full extent of the greenfield areas identified in Map A to be re-zoned by local councils as and when they are required.

45. In this context, we are concerned about the weakening of Greater Christchurch’s strategic planning framework, which promotes a consolidated urban form within an established infrastructure boundary, as a result of the proposed direction in the NPS-UD for councils to accept plan change requests for further greenfield development where conditions set out in the NPS-UD can be met.
46. The policies and Map A in the CRPS provide a clear, co-ordinated land use and infrastructure framework for Greater Christchurch. The Projected Infrastructure Boundary represents an agreed settlement pattern between Greater Christchurch’s councils and provides infrastructure providers more certainty about where long term urban development will be focused. We believe this remains an appropriate mechanism to ensure the strategic integration of infrastructure with urban activities, and to achieve the intensification and consolidation objectives in the UDS, FDS and CRPS.

47. There are strong reasons for containing urban activities, particularly in cities and towns not facing high and rapidly rising urban land prices and housing unaffordability. We consider that, particularly where sufficient development capacity can be demonstrated, there should not be a presumption imposed on councils to accept urban development in locations not already provided for in RMA plans.

48. In the case of Greater Christchurch, it has been shown through the FDS that sufficient development capacity can be provided largely based on the existing planning framework. We consider that the ongoing monitoring and review required by the NPS-UDC, and which is an action in the FDS, will ensure that the certainty regarding the provision of urban development is appropriately balanced with the need to be responsive to demand for such development.

49. If such a policy is included in the NPS-UD, there should be clear provisions that plan changes should not enable new urban development where it would adversely impact protected areas, such as areas with highly productive land.

**Removing minimum car parking requirements**

Q10. Do you support limiting the ability for local authorities in major urban centres to regulate the number of car parks required for development?

50. Environment Canterbury broadly supports the proposal to limit the ability for councils in major urban centres to regulate minimum car parking requirements for development, particularly where this encourages a mode shift to active and public transport.

51. Further to the potential benefits of encouraging mode shift, we note that reduced car parking provision can facilitate higher densities, and support mixed and vibrant places that are better designed for people rather than vehicles. We also acknowledge that locations with good access to alternative travel options, such as a central city location, are likely to see better outcomes as a result of reduced car parking provision.

52. In this context, we note that Option 1 in the discussion document, which would result in car parking provision being completely market-led, could lead to perverse outcomes if developers and operators choose to provide more car parking than required. For this reason, Option 2, which we understand would enable councils to manage car parking using maximum standards if they choose, may be preferable.
53. We suggest that the policy in the NPS-UD should be explicit in excluding provisions for disabled car parking, car sharing, and electric or other ultra-low emission vehicles from the matters councils would not be able to regulate.

Evidence for good decision making

Using market information to make decisions

Q12. 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?

54. Environment Canterbury supports the requirements in the NPS-UD for all councils with an urban environment to assess the demand and supply of development capacity, and monitor market indicators. This will help ensure all councils with jurisdiction over an urban environment have a better understanding of their local housing and business markets, and the impact of their planning decisions on these markets.

55. We also support the approach of enabling councils outside major urban centres to use a method for assessing the demand and supply of development capacity that is most appropriate to their own purposes. This should reduce the risk of imposing an overly onerous requirement on smaller councils. We also support the intention to extend the data made freely available by central government to all urban environments.

Preparing a Housing and Business Development Capacity Assessment

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?

56. Environment Canterbury broadly supports the proposed changes in the NPS-UD relating to how councils should undertake an HBA. This includes requiring an HBA to provide scenarios for demand and comparing these to development capacity, re-defining long term feasibility based, only as a starting point, on current costs and revenues, requiring an analysis of how plans may impact the overall supply and price of dwellings, and clarifying requirements for assessing diverse housing demands.

57. We also broadly support the stronger requirement for an HBA to factor in take up when estimating development capacity. However, we do question whether this requirement, on top of the requirement to add margins to demand, will result in councils planning for an oversupply of urban land. This would incur unwarranted costs to some councils. A more flexible approach for factoring in take up and adding margins would enable councils to better manage this issue based on local circumstances.

58. Consistent with our comments on FDSs, the requirement for an HBA to be prepared in time to inform an FDS, to then inform council’s LTPs and infrastructure strategies, and RLTPs, is supported.
59. Based on the assumption that the NPS-UD will come into effect during the first half of 2020, it is not anticipated that Environment Canterbury, through our work with the GCP, will have updated the Greater Christchurch HBA in time to inform our LTP 2021-2024 or the RLTP 2021-31, via an update to the Greater Christchurch FDS.

A2. What do you anticipate the impact of the proposed policies (and any related changes) would be on planning and urban outcomes?

60. As mentioned above, the strengthened requirement for an HBA to assess and factor in take up when estimating development capacity, coupled with the requirement to add margins to demand, could result in councils planning for an oversupply of urban land. While this could have a positive impact on affordability in some major urban centres, for other councils it would incur unwarranted costs due to the need to plan for and service this surplus development capacity.

61. The new requirement for an HBA to include scenarios for demand for housing and business land, and to compare these scenarios to development capacity, should also better enable councils to consider a range of possible growth scenarios. This should support a better understanding of the potential planning implications resulting from a higher or lower growth trajectory, and provide an opportunity for councils to consider growth more strategically (i.e. what would a high growth future look like).

62. The approach of the NPS-UD to provide greater flexibility for how councils meet the requirements to undertake an HBA, coupled with the change to when an HBA needs to be completed, should enable councils to adopt an approach best suited to their own local context, and build and retain their own internal capabilities. This is crucial for councils being able to effectively plan for urban growth on an ongoing basis without incurring significant costs to ratepayers through excessive consultant fees.

A3. Are the margins proposed in policies AP3 and AP12 appropriate? If not, what should you base alternative margins on? (e.g. using different margins based on higher or lower rural-urban price differentials).

63. As mentioned above, the strengthened requirement for an HBA to assess and factor in take up when estimating development capacity, coupled with the requirement to add margins to demand, could result in councils planning for an oversupply of urban land. A more flexible approach for adding margins to demand would enable councils to better manage this issue depending on their local context.

64. To support a more flexible approach, policies AP3 and AP12 of the NPS-UD could include a provision that additional margins of 20% in the short and medium term, and 15% in the long term, should be used as a starting point unless councils can reasonably justify alternative margins based on their own local circumstance.

65. One approach that councils could use as the basis for adjusting margins is the relative affordability of housing and business land, or the price differential between rural and urban land. These indicators should help show where additional development capacity
over and above levels of demand might help rebalance demand and supply in urban land markets, and contribute to improved price affordability outcomes.

66. Another possible approach is to consider the actual delivery of housing against the planned delivery. Where the actual delivery falls below a certain requirement, say 85% of the planned delivery, this could suggest the need for councils to adjust their margins upwards. This approach has been adopted in the UK’s Planning Practice Guidance.

**Engagement on urban planning**

**Taking into account issues of concern to iwi and hapū**

Q13. *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?*

67. Environment Canterbury supports the stronger direction in the NPS-UD for how councils should work with iwi, hapū and whānau to reflect their values and interests in urban planning processes. We believe the active participation and contribution of iwi, hapū and whānau is fundamental to achieving good planning outcomes, and that this involves their concerns and aspirations for urban environments being appropriately considered and addressed in relevant planning processes, including, for example, in relation to papakāinga housing.

68. In a Greater Christchurch context, Te Rūnanga o Ngāi Tahu is an integral member of the GCP.

**Timing**

Q15. *What impact will the proposed timing for implementation of policies have?*

69. Consistent with our comments on FDSs and HBAs, the new requirement for these two deliverables to be completed in time to inform council’s LTPs and infrastructure strategies, and RLTPs, should enable a more integrated approach to long term growth planning across council’s RMA, LGA and LTMA planning processes. The more flexible timeframes should also better enable councils to schedule this work, and build their own internal capabilities in meeting the requirements of the NPS-UD.

70. However, we would also like to highlight the challenges around timing for councils that may be required to complete an HBA and an FDS and initiate a response to a capacity shortfall through changes to RMA documents, in a three yearly cycle.
Alignment with other national direction under the RMA

Q17. 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 and include any suggestions you have for addressing these issues.

71. A potential area of tension between the NPS-UD and other national direction relates to the proposals in the National Policy Statement for Highly Productive Land (NPS-HPL). This particularly relates to the direction in the NPS-UD for councils to consider plan change requests for unplanned greenfield development, whilst the NPS-HPL seeks to protect highly productive land from inappropriate subdivision, use and development.

72. Should a new policy be included in the NPS-UD seeking to provide further greenfield development, it will be important that it includes clear provisions that plan changes should not enable urban development where it will have adverse effects on protected areas, such as those with highly productive land. This will give councils a clear direction to protect these areas when considering plan changes.

73. Further, whilst we support many of the changes central government is seeking to introduce through the new National Policy Statement for Freshwater Management, we note some potential areas of tension between these proposals and the NPS-UD. For example, new freshwater attributes and national bottom lines are likely to require new limits and rules in regional plans, and potentially more restrictive limits on discharges of stormwater and wastewater. A new National Environmental Standard to regulate wastewater discharges could also impose a higher standard of treatment on wastewater discharges than required by a rule in a regional plan. If funding for the upgrade or improvement of related infrastructure is not available, this could slow new development.

74. The hierarchy in Te Mana o te Wai could also have implications for water allocations in urban areas. The availability of water for essential human health needs (identified as a second priority after healthy ecosystems) could constrain urban development capacity in areas where higher flows are needed to manage ecosystem health in waterways.