To the Ministry for the Environment

Submission by
Waimakariri District Council

In the matter of the
Planning for successful cities: A discussion document on a proposed National Policy Statement on Urban Development

1 October 2019
Person for contact: [Name], Development Planning Manager
Introduction

The Waimakariri District Council (Council) considered the Ministry for the Environment’s draft report into Planning for successful cities: A discussion document on a proposed National Policy Statement on Urban Development at a Council briefing session on 17 September 2019 and approved this submission to the draft report at a Council meeting 1 October 2019.

The Council has taken this opportunity to respond to all of the questions outlined in the discussion document. The Council also supports the submission made on behalf of the Greater Christchurch Partnership; this submission provides further comment from the perspective of Council.

Questions

Q1. Do you support a National Policy Statement on Urban Development that aims to deliver quality urban environments and make room for growth?

Council supports the intent of the NPS-UD, including the focus on Council’s to plan to make room for growth – both “up” and “out” in a way that contributes to a quality urban environment. Council has a focus of achieving quality urban environments at a scale and scope which meets the needs of the current and future population of townships within the Waimakariri District. To contribute to this, over the past three years Council has been implementing a work programme which includes developing:

- ‘Our Space’ – Greater Christchurch’s Future Development Strategy as part of the Greater Christchurch Partnership;
- Waimakariri 2048: District Development Strategy;
- Kaiapoi Town Centre Plan – 2028 and Beyond; and

In addition, Council is currently in the process of updating the Rangiora Town Centre Plan and developing new residential structure plans for East and West Rangiora and Kaiapoi. All of these documents will be integrated into our District Plan Review, which will be notified mid next year.

There seems to be an alignment of intent between the plans and strategies the Council has developed and the draft NPS-UD. However, there seems to have been a lack of consideration of the potential impacts of some of the new requirements will have on smaller Councils such as the Waimakariri District Council (which form part of the “Christchurch” major urban centre). The focus seems to be with requirements that might be more appropriate in a city context (such as the potential intensification rate for housing and restricting the provision of car parking).

Council suggests that further consideration is required before finalising the draft NPS-UD to provide for the opportunity to scale the objectives and policies at a suitable approach to support both larger and small Council who form part of a “major urban centre”.

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Q2. Do you support the approach of targeting the most directive policies to our largest and fastest-growing urban environments?

Yes, Council broadly supports the targeting of the directive policies to the “Major Urban Centres”, noting the comments above in response to Q1.

Q3. Do you support the proposed changes to future development strategies (FDs) overall?

Council broadly supports the current drafting of Objective O1 and Policies P1A, P1B, P1C, P1D, P1E, P1F, P1G, P1H and P1I.

Council would like to make some minor comments / suggestions to the wording of policies P1C, P1D and P1E.

- P1C – “Every FDS must consider other national directions”. Section 55 (2B) of the Resource Management Act already states that local authorities must also make all other amendments to a document that are required to give effect to any provision in a National Policy Statement. However, what would be helpful is for the Government to provide some direction to Councils on how to balance the needs of each individual National Policy Statement as a collective and what possible weight or importance each National Policy Statement has at the national level.
- P1D – (f) – “how to provide for business land”. Is this requirement not covered by point (c)? If not, what else other than zoning land could Council give effect to (f)?
- P1E – (c) – as the intent of this point is already made in P1D (g), should the drafting of P1E(c) just state the need to “work together with local iwi and hapū”.

Council is supportive of the proposed change to the timing requirements of the Future Development Strategy to better align with the development of the Long Term Plan/Infrastructure Strategy by Councils. However, in the short term, this will be difficult to achieve as Councils are already currently embarking on the development of the next Long-Term Plan, with the majority of this work to be completed before this draft NPS-UD is operative. Therefore it will be necessary to outline in the NPS-UD or the subsequent guidance that this outcome will be progressively achieved over the next two Long-Term Plans.

Q4. Do you support the proposed approach of the NPS-UD providing national-level direction about the features of a quality urban environment?

Council supports the need to provide direction around the features of a quality urban environment, but this also needs to reflect the scale differences between towns and cities that would contribute to a “quality urban environment”. Strengthening O2 and P2A in this regard would be helpful to address this issue. For example:

P2A: When making planning decisions that affect urban development, and the way and rate at which development capacity is provided within an urban environment, local authorities must have particular regard to:
a) enabling a range of dwellings types and diverse locations, working environments and business locations.

b) ...

This suggested change is trying to look demand at the township levels.

Q5. Do you support the inclusion of proposals to clarify that amenity values are diverse and change over time?

While Council supports the fact that amenity values are diverse and change over time, many of the plans, strategies and spatial plans that Council develops concerning future growth are progressed under the Local Government Act 2002. Under this legislation, there is a requirement and a focus on Councils to consult with the community on issues that might affect them. The views of the existing residents are essential to consider alongside what the future residents might say if they had an opportunity. It is vital to balance the needs of existing and future residents when considering how towns will change with growth via the use of spatial planning techniques and a better understanding of intensification issues. However, the competing requirements under existing legislation makes this challenging to achieve.

This is unlikely to be addressed in a meaningful manner, as proposed in O4 and P3A. Therefore Council considers that this issue should be addressed via the comprehensive review of the resource management system and how the relationship between the Resource Management Act, Local Government Act and Land Transport Management Act could be better integrated to support spatial planning.

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?

Council supports replacing the concept of "sufficient" capacity with one of enabling enough capacity to meet demand and the need to not only meet total demand capacity, but also the need to meet the demand within different diverse locations and housing types. This is important as the urban environment of Christchurch which consists of a range of individual townships, suburbs and Town Centres/Suburban Centres/Christchurch CBD which needs to be carefully considered in terms of responding to residential demand and supply. "Our Space" the Future Development Strategy for Greater Christchurch makes the following statement in this regard:

"Due to the close location of Christchurch City, Selwyn and Waimakariri, these local housing markets share a number similarities, for example, three to four-bedroom dwellings make up about two-thirds of the overall housing stock for each territorial authority. Although some demand for housing will be transferable between these local markets, this is not always the case given individuals and families make decisions on where they want to live based on their own needs and wants at the time of buying a house. Such factors include lifestyle, and proximity to amenities, education and employment. In the future, these factors are also likely to alter due to
demographics changes, meaning the three housing markets will need to adapt to the changing profile of future housing demand.”

Similar to the suggested change to P2A, Council suggests making a minor change to P4A to include "diverse locations" rather than merely "locations" to meet the demand for dwellings in a range of locations. This is in line with the intent of the 2\textsuperscript{nd} bullet point on page 30 of the discussion document.

Q7. Do you support proposals requiring objectives, policies, rules and assessment criteria to enable the development anticipated by the zone description? 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?

Council is supportive of the use of zone descriptions to inform the community of the outcome they could expect from development in these areas. As Council is implementing the National Planning Standard, section 8 already provides a basis for these descriptions. Council is also considering providing more detail to these zone descriptions as a result of the spatial planning exercise currently in development for Rangiora and Kaiapoi.

Q8. Do you support policies to enable intensification in the locations where its benefits can best be achieved?

Council supports the intent of Objective O7, which seeks to increase density in existing areas where those benefits are best realised. However, the policy or policies that will give effect to this objective needs to consider what is the most appropriate scale and rate of the intensification between different towns and cities that form part an urban environment.

Council considers that option one would more closely align with this approach. However, it would depend on how "suitable catchment area" is defined. Council believes that the NPS-UD should allow local authorities to determine what a “suitable catchment area” is so that the response provided in Future Development Strategy could target different rates of intensification within diverse locations to meet the changing demand for residential housing due to the rate of population growth and demographic changes. It is essential to note the population growth and demographic changes occur at different rates within towns, suburbs and Town/Suburban Centres/CBD within a quality urban environment and this needs to be reflected in the policy.

To support this, Council suggests that if option one is adopted (which is recommended), it would seem that Policy P6A and P6C could be merged as the intent of the policies currently overlaps. The new Policy P6A could be drafted in the following manner:

\textit{P6A: Within District Plans, enable higher-density residential development areas, especially in locations where there are one or more of the following:}

\begin{itemize}
  \item \textit{a) proximity to town/city centres or major employment areas}
  \item \textit{b) proximity to existing or planned active transport and/or public transport networks}
\end{itemize}
c) efficient use of current or planned infrastructure, services and facilities

The provision of higher density residential development areas needs to be at an appropriate scale for different locations within an urban environment. This level will be defined by each local authority within their District Plans to meet population and demographic changes in these locations.

New Definition: Higher-Density Residential Development Areas: areas used predominantly for residential activities with high concentration and bulk of buildings, such as apartments, and other compatible activities

Regarding option two of Policy P6C, Council is unable to support this option as the specific rate of 60 households per hectare for high-density housing would be inappropriate to achieve for the level and scale of intensification in Rangiora and Kaiapoi. For these townships this could require a significant amount of the existing residential zoned land to be intensified at this rate which Council considers would considerably limit the ability to comply with objective 5 and policy P4A of the draft NPS-UD which seeks to meet the demand for dwellings via the provision of housing choice (in terms of location, typology and price) over the short, medium and long term. The intent of Objective 5 and Policy P4A seems to link with the flexibility suggested in Option 1 strongly.

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?

Council is aware that the suggestion put forward in the draft discussion document around out of sequence greenfield growth is potentially trying to address land banking which could incentivise development to occur in a manner that meets the demand for housing and business land as required by Policy P4A. As part of the District Plan Review, Council is looking into this issue for the future development areas of Rangiora and Kaiapoi identified on page 29 of “Our Space” – Greater Christchurch’s Future Development Strategy. Council would like the opportunity to discuss these draft provisions with officials from MfE and MHUD to see how they might align with the intent sought by this draft policy.

In terms of the draft example policy, there is a high financial risk to Council of out of sequence development occurring in areas that have not been subject to consideration during the drafting of Council’s Infrastructure Strategy and/or Future Development Strategy. Therefore Council would suggest that in relation to clause (e), if a residential Plan Change was to zone land outside of land subject to a Future Development Strategy, then the scale of the area must allow developers to fund the full economic cost of infrastructure including the requirement to connect to existing reticulated sewer and water services.

Q10. Do you support limiting the ability for local authorities in major urban centre to regulate the number of car parks required for development?
Council does not support limiting the ability for all local authorities within a major urban centre to regulate the number of car parks. Again this issue comes down to the scale and scope of development that occurs in towns, suburbs, town/suburban centres and CBDs and that this suggested approach (any of the three options) may well be suitable for a city context, however, for rural service towns such as Rangiora and Kaiapoi this is not appropriate. These rural service towns support both the existing residents and the rural community surrounding them (and sometimes further afield) who have limited to or have no access to public transport to travel into Rangiora or Kaiapoi Town Centres.

The management of car parking has been subject to Town Centre Plans for both Rangiora and Kaiapoi and Council has developed a parking model to better align the need for parking with the location of existing and new retail and commercial developments. This includes implementation mechanisms outside of purchasing land for parking such as timed car parking. The Town Centre Plans and Parking model also allows Council to consider the opportunity to collocate parking areas along with the ability to develop public car parking areas from financial contributions rather than new development always having to develop car parks on their own individual sites.

Should a policy like this be included in the final version of the NPS-UD, potentially the burden of providing enough car parking within Town Centres (if there is a shortfall in provision) would fall on the ratepayers of the Waimakariri District rather than using the mechanisms in the District Plan and Town Centre Plans as outlined above.

Council recommends that if this policy was to be included (any of the three options) in the final NPS-UD then it should only apply to cities contained within the Major Urban Centre.

Q11. Do you think that central Government should consider more directive intervention in local authority plans?

Any national direction tool would need to consider the implications of the removal of rules could have on small councils within Major Urban Centres and their ability to then achieve quality urban environments.

Q12. Do you support requirements for all urban environments to assess demand and supply of development capacity, monitor a range of market indicators?

Yes, Council fully supports the requirements as drafted in O8, P8A, P8B, P8C, P8D.

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?

Yes, Council fully supports the requirements as drafted in O9, P9A, P9B.

Q14. 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?
Yes, Council fully support the requirements as drafted in O10, P10A, P10B and P10C

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

Yes, see the first bullet point in the response for Q3.

Q16. What kind of guidance or support do you think would help with the successful implementation of the proposed NPS-UD?

Council is supportive of guidance documents to be developed to help Council give effect to the NPS-UD. However, these documents need to be released at the same time the NPS-UD is made operative. This will allow Councils to consider how best to implement the NPS-UD in a prompt manner.

Q17. Do you think there are potential areas of tension or confusion between any of these proposals and other national directions?

Yes, see response for Q3.

Q18. Do you think a national planning standard is needed to support the consistent implementation of proposals in this document?

No, not at this stage.

**Housing and Business Capacity Assessment**

A1. Do you support the changes to the HBA policies overall?

Yes, Council supports these provisions.

A2. What do you anticipate the impact of the proposed policies would be on planning and urban outcomes?

Improved understanding of the housing and business markets within the Waimakariri District and Greater Christchurch.

A3. Are the margins proposed in policies AP3 and AP12 appropriate?

Yes, based on work completed to date as part of the NPS-UDC.

A4. How could these policies place a greater emphasis on ensuring enough development capacity at affordable prices?

Any further work on this subject should be part of the review of the RMA.

A5. Do you support the approach of targeting the HBA requirement only to major urban centres?
Yes, noting that Waimakariri is currently subject to the full provisions of the NPS-UDC.

Thank you for the opportunity to submit on the discussion document.