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

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New Plymouth District Council
Private Bag 2025
New Plymouth 4340
Taranaki
New Zealand
Submitter Type: City/district council
Source: Web Form
Overall Position: Support in part

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
Somewhat
Notes
We generally support the amendments made to replace the National Policy Statement for Urban Development Capacity 2016 with the new proposed National Policy Statement for Urban Development (NPS-UD). We support the need for local government to plan for robust urban development and growth, for a more responsive monitoring framework, and for the more targeted nature of the proposed NPS-UD. However, the on-going obligations and costs placed on Councils are identified as a concern and it is considered that on-going support is required to assist implementation. In addition to this please see our suggestions below on those areas we would like to see amended.

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
We acknowledge the appropriateness of targeting the more onerous provisions to Major Urban Centres and recognise the additional flexibility that this change provides to the New Plymouth District. However, it needs to be acknowledged that provincial cities experiencing growth also have growth challenges.

Clause
Do you support the approach used to determine which local authorities are categorised as major urban centres? Why/why not?
Notes
Although not a metropolitan area New Plymouth District is experiencing unprecedented growth. The NPS-UD does not distinguish between fast growing councils and those who are not experiencing growth. The contribution of fast growing provincial areas contribute significantly to the national economy, ie: the GDP per person of New Plymouth District is the second highest in the country after Wellington. It is considered that the NPS-UD needs to continue to recognise the growth challenges that fast growing provincial cities are experiencing including: - Urban land markets that do not respond to growth demand and that are risk adverse; - A focus on greenfield – outward expansion which is counter to many of the NPS-UD policies; - Transport systems that are not well integrated and that lead to inefficient urban development outcomes; and - Aging infrastructure networks that have not historically factored in growth. The NPDC has a full programme of network planning committed through its Long Term Plan so that it can better respond to its growth challenges in the future. This is likely to lead to increased capital works to upgrade its networks.

Clause
Can you suggest any alternative approaches for targeting the policies in the NPS-UD?
Notes
To better recognise fast growing councils, consideration could be given to a second tier of councils, between the Major Urban Centres and local authorities in all urban environments. This would better recognise fast growing areas and the similar challenges they face (as identified above) due to high population growth. It is noted that all councils are still required to assess demand for housing and business space and supply of business capacity to meet demand under Policies P8A, P8D. However, to sufficiently undertake this work some reporting will be required as in a Housing and Business Capacity Assessment. NPDC suggests that those fast-growing councils are still required to meet the requirements under P8C to ensure appropriate and robust planning.

Clause
Question 3. Do you support the proposed changes to FDSs overall? If not, what would you suggest doing differently?
Position
Somewhat
Notes
In general we also support the proposed changes whereby only the MUCs will be required to produce a Future Development Strategy. We note that identification and planning for future urban development and associated infrastructure requirements is part of business-as-usual infrastructure planning and district planning work. This has been on-going through the development and alignment of the Infrastructure Strategy and the Proposed District Plan. It is agreed that an additional strategy is not required and should be optional.

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
The policies listed in P1D are useful for guiding growth planning and can be delivered through other documents. It needs to be clear that their consideration is not limited to a Future Development Strategy. For example P1D a)-f) can be delivered through District Plans, g) through Mana Whakahono A Rohe agreements and h) through the Infrastructure Strategy. For example funding gaps between capacity and infrastructure as set out in Policy P1D(h)(ii) can be clearly identified in the Infrastructure Strategy, which should provide a good basis to apply for future infrastructure funding. The role of Councils Financial Strategy also needs to be acknowledged.

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
We support all urban territorial authorities in the second tier (see our suggestion in paragraph 3 above) be ‘encouraged’ to prepare a Future Development Strategy.

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
Somewhat
Notes
We support the requirements regarding quality urban environments in principle but also acknowledge the challenges with defining and implementing this subjective term. Clarity is sought on the purpose of the pre-amble if it does not have statutory weight. If not intended to have a statutory basis this may sit better in guidance documents that support the NPS. It is also suggested that more directive policies are included in relation to integration with the Land Transport Act to align growth objectives with public transport provision.

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
See above.

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
There is general support for the intent of the policies, which reflect best practice planning. There is support for Policy 2B in particular and the requirement that decision-makers must have regard to the positive impacts of urban development when assessing resource consent applications.
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**
Unsure

**Notes**
Question 6 asks whether we support the addition of direction to provide development capacity that is both feasible and likely to be taken up, and whether this will result in development opportunities that more accurately reflect demand. We seek further clarity around the criteria for capacity that is ‘likely to be taken up’, as we note that reluctance on the part of landowners to develop their land is very hard to measure and to forecast, particularly in the medium to long term. We are concerned that if we exclude suitable land that is feasible and serviceable under all other measures, but does not have a current willing landowner, it could result in fragmented growth throughout the district. We also request that further information and support be provided by the Ministry in respect of the feasibility model and suggest that continued joint territorial authority forums would be useful on this matter.

 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**
We generally support the use of zone descriptions as identified in the National Planning Standards to ensure national consistency across the application of plan provisions. These have been applied in the Proposed District Plan.

 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**
See above.

 Clause
Do you think that amenity values should be articulated in this zone description? Why/why not?

**Notes**
Descriptions of amenity values may have local variants and are likely to be more challenging to standardise.

 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**
We support intensification in principle as outlined in O7 and P6A-6B. NPDC has provided for intensification in appropriate locations in the Proposed District Plan. It is noted that consideration of intensification in fast growing regional cities is more aligned with medium density living as opposed to the high density considerations for MUC’s. The term ‘higher-density’ development in P6-A could be replaced with “increased-density” to acknowledge that medium density may also be appropriate for provincial fast growing cities. This will also reduce the potential for misinterpretation of the intent of this policy and ‘high density zones’ in the National Planning Standards.

 Clause
What impact will these policies have on achieving higher densities in urban environments?

**Notes**
See above.

 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**
See above.

 Clause
What impact will directly inserting the policy to support intensification in particular locations through consenting decisions have?

**Notes**
See above.
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?
Notes
See Q8 answer.

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?
Position
Yes
Notes
We support the proposal to limit the ability of local authorities in major urban centres to regulate the number of car parks required for development. While New Plymouth District is not a major urban centre, it is to be noted that this proposal aligns with the car parking policies in our recently notified Proposed District Plan.

Clause
Which proposed option could best contribute to achieving quality urban environments?
Position
Option 3: removing the ability for local authorities to set minimum car park requirements in areas providing for more intensive development.
Notes
See above.

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
Yes
Notes
As indicated above NPDC supports the use of robust evidence to support decision making. Having completed the Housing and Business Capacity Assessment, and using this as a basis for its long term and District Planning, NPDC sees value in continuing to undertake this work. It is noted that it will be challenging for Councils experiencing growth to meet P8D without undertaking the work required in P8C. A mandatory requirement for fast growing councils to continue this reporting will enable councils to justify and resource these spatial and economic assessments so they can better respond to growth. It is requested that the Government continue to operate the dashboard for fast growing councils, not just MUC’s. The centralisation of this information adds significant value and efficiencies and ensures that councils can meet the requirements of P8D. It is agreed that quarterly reporting for monitoring is onerous and a change to annual reporting is more realistic. The HBA has provided a robust evidence base for our section 32 reports and internal and external conversations about growth in the district. It is also informing the Councils infrastructure teams network planning and future capital investments. The government is also using this reporting to understand and support the need for regional investment. For example the Ministry of Education have just released their growth agenda for the District that utilised the data in the Housing Business and Capacity Assessment.

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
NPDC supports improvements around engagement with iwi, hapū and whanau to reflect their values and interests in urban planning. Through its District Plan Review NPDC has proactively worked with Ngā Kaitiaki (mandated iwi and hapu representatives) who have provided cultural advice into the Proposed District Plan. Urban growth is one of the key issues that has been identified as of interest to this group. It is noted that the RMA already provides for iwi and hapū to be engaged with respect to regional policy statements and regional and district plans and that there are also Local Government Act requirements. It may be that more outcome-based policies are included alongside these policies. For example consideration could be given to cultural considerations in defining quality urban environments. Mana Whakahono a Rohe processes also provide a potential framework for engagement. Consideration should be given to the alignment of NPS policies O9, P9A and P9B with these types of agreements. In respect of engagement with Māori who do not hold mana whenua over their urban environment in which they now live, it is noted that the RMA focuses on engagement with iwi authorities.

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
See above.

**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**
See above.

**Clause**
What impacts do you think the proposed NPS will have on iwi, hapū and Māori?

**Notes**
See above.

**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**
We agree that planning decisions should be coordinated and aligned with infrastructure decisions and note that all local authorities are working to different planning timeframes. We submit also that coordination is important between regional and district councils who have different roles in urban development. Decisions on the management of the natural environment overlap with overall growth objectives. Consideration of issues around reverse sensitivity are particularly important. In respect of collaboration with iwi and hapū in our region, we refer you to our submissions on ‘engagement on urban planning’.

**Clause**
Question 15. What impact will the proposed timing for implementation of policies have?

**Notes**
NPDC submits that flexible timeframes are critical to making the NPS less onerous for local authorities to implement alongside their infrastructure plans and strategies. We submit that the timeframe should be within a certain period from the completion of those plans and strategies, so that each Council has agreed to any changes required as a result of the NPS. NPDC submits also that amendments made outside of the Schedule 1 process would be a lot less costly and time-consuming for Councils.

**Clause**
Question 16. What kind of guidance or support do you think would help with the successful implementation of the proposed NPS-UD?

**Notes**
An implementation programme that consists of guidance documents, technical support and ongoing face to face engagement with local authorities would be supported. It is noted that the support provided to high and medium-growth councils following the release of the NPS-UDC needs to continue. This will ensure on-going implementation of the policy statement.

**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.

**Position**
Somewhat

**Notes**
NPDC submits that there are challenges in aligning all the proposed NPS documents with each other. We would like to see it clearly defined as to which NPS takes precedent, where there are conflicting values between the Proposed NPS-UD and Proposed NPS-HPL. NPDC would also support consideration be given to the merging of the NPS-UD with the NPS for Highly Productive Land.

**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?

**Position**
No

**Notes**
In regards to Question 18 NPDC submits that a national planning standard is unnecessary to implement the proposals in the NPS-UD.