Submission from Waitomo District Council on the Proposed National Policy Statement on Urban Development

Thank you for the opportunity to make a submission on this Proposed National Policy Statement. Waitomo District Council (WDC) observes that there is an unprecedented amount of national policy direction currently requiring time and resource to respond to. As such our submission on this Proposed National Policy Statement is succinct.

This submission represents the views of the Mayor and elected members of the Waitomo District Council.

Our submission is as follows:

1. WDC submits that it is imperative that the Proposed National Policy Statement on Urban Development and the Proposed National Policy Statement for Highly Productive Land are clearly aligned with one another. In addition, the definitions used in the Proposed National Policy Statements need to correspond with the definitions employed in the National Planning Standards.

2. WDC is supportive of O1, O2, O3, O4, P2A-P2B, O7, P6A, O9 and P9A-P9B.

3. WDC notes that P3A does not provide particularly helpful guidance on making amenity decisions for our communities. We do not consider the policy aligns particularly well to section 7(c) of the Resource Management Act 1991. It also seems to run counter to the requirement to deliver quality urban environments.

4. WDC submits that O5 needs to clearly align with the National Policy Statement for Highly Productive Land and these links should be provided in the objective, through P4A and through the new provisions to provide for further greenfield development.

5. WDC notes that the table on page 10 states that P4G applies to all urban environments but the table on page 32 suggests it applies only to major urban centres.
6. WDC notes that the table on page 10 states that O6 applies only to major urban centres but the table on page 34 suggests it applies to all urban environments.

7. WDC opposes “direct intervention to promote quality urban development”. WDC does not consider that removing the height to boundary rules and other bulk and location standards including site coverage and provision of outdoor space will promote quality urban environments. WDC considers that removal of these planning tools will result in “direct intervention promoting poor quality urban environments”.

8. WDC opposes the imposition of objective O8 and P8A-P8B. This is a significant cost outlay for no purpose where small councils are not predicted to experience high growth. WDC seeks exclusion from the requirements of these provisions.

Thank you for the opportunity to make this submission.

on behalf of Waitomo District Council

2 October 2019

For enquiries regarding this submission please contact: