

14 July 2016

NPS Urban Development  
Ministry for the Environment  
PO Box 106483  
Auckland City 1143

Our Reference: A274311

Dear Sir

***Joint Submission from Environment Southland and Southland District Council on the Proposed National Policy Statement on Urban Development Capacity***

**Introduction**

We welcome the opportunity to submit on the *Proposed National Policy Statement on Urban Development Capacity: Consultation Document* (Proposed NPS-UDC). This submission has been prepared as a joint staff submission from Environment Southland and Southland District Council.

The proposed Southland Regional Policy Statement seeks to outline the key issues for the Southland region. In particular, the Urban chapter identifies the key issues facing urban Southland as:

- sporadic and uncoordinated urban growth and development can result in a loss of high value soils, create inefficiencies in the transportation network, and create demand for the provision of additional infrastructure or upgrading of existing infrastructure;
- reverse sensitivity effects, and potential impacts on soil, indigenous biodiversity, amenity values, cultural values and water quality;
- population change and patterns of urban development can result in high costs to maintain infrastructure that is underutilised; and
- urban areas which develop in ways that do not recognise the principles of high quality urban design.

The Southland Mayoral Forum has recently established the Southland Regional Development Strategy, with the primary focus of the strategy on increasing population in the Southland region. The Strategy calls for bold, yet practical action to build a stronger, brighter future. The Southland Regional Development Strategy (October 2015) sets out a population target of 105,000 by 2025 for Southland, being an overall goal of an additional 10,000 people in Southland by 2025. If the Southland Regional Development Strategy is realised, and Southland experiences population growth, the relationship of the NPS-UDC to the Southland region will change significantly.

In particular, our specific submission points are outlined below:

➤ **Tiered approach**

The Southland Councils recognise that in some parts of the country, development pressure on the urban areas is a significant concern. However, there are other parts of the country, such as Southland, where the population remains static or has very low growth. Therefore the Southland Councils support the tiered approach that has been taken within the Proposed NPS-UDC with the policies requiring different levels of analysis and policy direction relative to the development pressure and forecasted population growth as outlined in the consultation document.

➤ **Provision of suitable land through pro-active zoning**

The Southland Councils support the principle of ensuring that suitably located and zoned land is available for residential and business uses, through proactively zoning areas in RMA planning documents. This approach ensures the community has a clear signal on where future development is likely to occur, and avoids lengthy and costly RMA processes for “out of zone” developments.

➤ **Spatial planning**

There are multiple tools available for managing growth and development, and imposing a mandatory approach to provide for urban development as set out in the Proposed NPS-UDC could duplicate the work already being done in this area, or remove the flexibility for Councils to take an approach suitable for the local context. For example, the Southland Regional Development Strategy has identified the potential to develop a Spatial Plan for Southland which would seek to identify appropriate locations for future commercial, industrial and residential development. Such a spatial plan would be developed through consultation with community and industry groups, whilst giving consideration to issues such as risk of natural hazards, proximity to key transport routes and any other significant environmental constraints.

➤ **Clarity on requirements for Housing and Business Land Assessments**

Depending on population growth within the Southland region, there may be an increase in staff resourcing required to undertake the Housing and Business Land assessments. To ensure any assessments required are done as efficiently and effectively as possible, further clarity and guidance material is sought to ensure that a consistent national approach is undertaken when preparing this information. Clarity and confirmation is also sought that all of the information that is required to undertake these assessments, such as house prices and vacancy rates will be easily assessable for Council staff and up-to-date.

If you wish to discuss the feedback further, please contact Sonya Nicol of this office on telephone (03) 211 5115 or email: [sonya.nicol@es.govt.nz](mailto:sonya.nicol@es.govt.nz).

Yours sincerely



R A Phillips  
**Chief Executive**