

“Proposed NPS on Urban Development Capacity”

Marlborough District Council submission to the Ministry for the Environment

Introduction

The Council welcomes the opportunity to provide comment on the Proposed NPS on Urban Development Capacity.

Marlborough has one significant area of urban development, Blenheim. Blenheim is included as a “Main Urban Area” in Appendix A1 of the consultation document.

As is set out in the submission below, the Council has already undertaken a procedure similar to that set out in the proposed provisions of the NPS and plan changes to provide for future residential growth in and around Blenheim are operative.

The Council’s comments on the Proposed NPS relate to accuracy of the statistics applied to Blenheim and the applicability of the Proposed NPS when significant planning for growth has already occurred.

Accuracy of statistics

Appendix A1 of the consultation document identifies that Blenheim is a main urban area, i.e., has a population in excess of 30,000. The population of Blenheim and the projected growth in population are set out in Appendix A2 of the consultation document.

Table 1 of the consultation document identifies that Blenheim’s projected rate of growth is 4.7%.

These statistics surprised staff of the Marlborough District Council. They have been using a population of approximately 24,000 and a lower rate of projected population growth (4%) as the basis for land use and infrastructure planning. These statistics were also accessed from Statistics NZ.

During the submission period, the Council sought clarification as to how the statistics included in the consultation document were derived. Ministry staff subsequently confirmed that the spatial extent of the Blenheim urban area was identified by Statistics NZ and provided the Council with that spatial coverage. The spatial area includes the urban area of Blenheim, but also four separate and distinct townships: Grovetown, Spring Creek, Woodbourne and Renwick. The population of each township and the distance of the township from the current urban limit of Blenheim are provided in the table below:

Township	Distance from Blenheim (km)	Population estimate
Grovetown	2	203
Spring Creek	4.5	355
Woodbourne	5	420
Renwick	7.5	2180

The character of the land between Blenheim and the townships is rural and is predominantly utilised for viticulture.

The operative zoning for the “Blenheim Urban Area” is provided in Appendix 1. The urban area of Blenheim used for residential purposes is grey (Urban Residential 1 and 2 zones). The urban area of the four townships is lilac (Township Residential zone) and the surrounding rural environment is yellow (Rural 3 zone).

It would be a surprise to the residents of Grovetown, Spring Creek, Woodbourne and Renwick that they reside in Blenheim. It is submitted that the Blenheim Urban Area does not and should not include these townships or the considerable areas of rural land that separates them.

The inclusion of the four townships and the rural land surrounding Blenheim also results in an increase in the projected rate of population growth from 4% to 4.7%. The potential implications are discussed in greater detail below.

Each of the four townships has constraints to the provision of growth. In the case of Spring Creek and Grovetown, there is a significant flood hazard associated with the Wairau River. There is also a potential flood hazard immediately north of Renwick. Finally, Woodbourne is directly adjacent to Marlborough Airport which presents a noise constraint to the provision of residential growth. If the intent is to deliberately include the four distinct townships in the planning for residential and business growth in Marlborough, then it should be acknowledged that there are constraints in the ability to provide for growth in these townships.

In summary, it is considered that the Blenheim Urban Area should be more accurately defined so that it reflects the physical extent of the town and the town only. The Council uses the following Statistics NZ mesh blocks to derive Blenheim’s population:

- 581210: Springlands
- 581220: Mayfield
- 581230: Blenheim Central
- 581240: Whitney
- 581250: Redwoodtown
- 581260: Witherlea

Recommendation

That the Blenheim Urban Area be determined on the basis of mesh blocks 581210 to 581260 and that Blenheim be reclassified as a “Secondary Urban Area” as a result.

Existing provision for growth

In 2009 the Council initiated a significant planning exercise to provide for residential and business growth in all towns and townships in Marlborough for a period of 25 years. This work was undertaken in stages starting with the Blenheim CBD, progressing to urban areas in Southern Marlborough and was completed in Marlborough North. A collaborative process was utilised in each case to prepare a proposal that was then notified utilising the special consultative procedures of the LGA 2002. Submissions on the proposals were heard by Councillors via public hearings during 2010 and 2011. Decisions were released in 2012 in the document “Growing Marlborough”. The document

can be accessed from the Council website via www.marlborough.govt.nz/Your-Council/Growing-Marlborough.aspx.

In the context of residential growth in and around Blenheim, the decisions were implemented with the notification of changes to the Wairau/Awatere Resource Management Plan in August 2013. The plan changes proposed rezoning approximately 200 hectares of rurally zoned land to the north and north-west of Blenheim to Urban Residential 2. Two of the six plan changes were rejected but the remainder were made operative at the conclusion of the First Schedule process in October 2014. The resulting zoned land can be seen in Appendix 1 as grey with a green cross hatching (signalling Urban Residential 2 – Greenfields zone).

The operative plan changes provide for 25 years of residential growth. In other words, the Council has already provided sufficient residential development capacity so that Blenheim can meet residential demand through to 2039.

The decisions for the provision of business growth in and around Blenheim (and for residential and business growth in other towns and townships) are included in the Proposed Marlborough Environment Plan, which was publicly notified on 9 June 2016.

Subject to the outcome of the First Schedule process for the Proposed Marlborough Environment Plan, the same may also be said for business development capacity.

Collectively these planning exercises represent a significant investment in growth planning by the Council and the community.

If the proposed extent of the Blenheim Urban Area remains as proposed (noting the Council's submission above) the projected population growth of 4.7% is very close to the threshold for a "medium growth area". Exceeding this threshold triggers a requirement for the Council to give effect to 12 additional policies (PB1-PB5, PC1-PC3, PD1-PD4). In particular, it requires the Council to undertake in depth assessments and regular monitoring of a range of indicators. These requirements apply in spite of the Council already providing sufficient development capacity through its operative resource management documents. The Council does not consider this to be an efficient policy response: It involves costs to the Council (and ratepayer) without any discernible benefit due to the fact that objective OA2 has already been achieved.

The Council believes that an exemption process should be incorporated into the NPS to avoid inefficient planning processes from occurring. Within a specified time period of the NPS coming into effect, a local authority could be provided with an opportunity to apply to the Minister for the Environment to demonstrate that it already achieves Objective OA2 through operative planning documents. The consultation document defines "short term" as a period of three years. This same period could apply to any such opportunity. The time period would provide sufficient time for proposed provisions for growth to be completed when plan changes have already been notified (while acknowledging that the decisions may be appealed). Another option could be to use the same period as set out in Policy PB1 (i.e., by the end of 2018).

There is precedent for such an exemption process. The NPSFM 2014 provides the opportunity for freshwater quality to be set below the national bottom line where infrastructure contributes to the existing state of water quality.

The exemption process could be achieved simply through an amendment to introductory text to policies PB1 to PB5 and PC1 to PC3. For example, the following could be inserted prior to the existing text "Except where the Minister exempts a local authority,..."

An exemption policy could also be included in the NPS as a new PB6 as follows: "Local authorities may make an application to the Minister prior to [insert timeframe] to exempt them from the requirements of PB1 to PB5 if operative regional policy statements and plans already achieve Objective OA2."

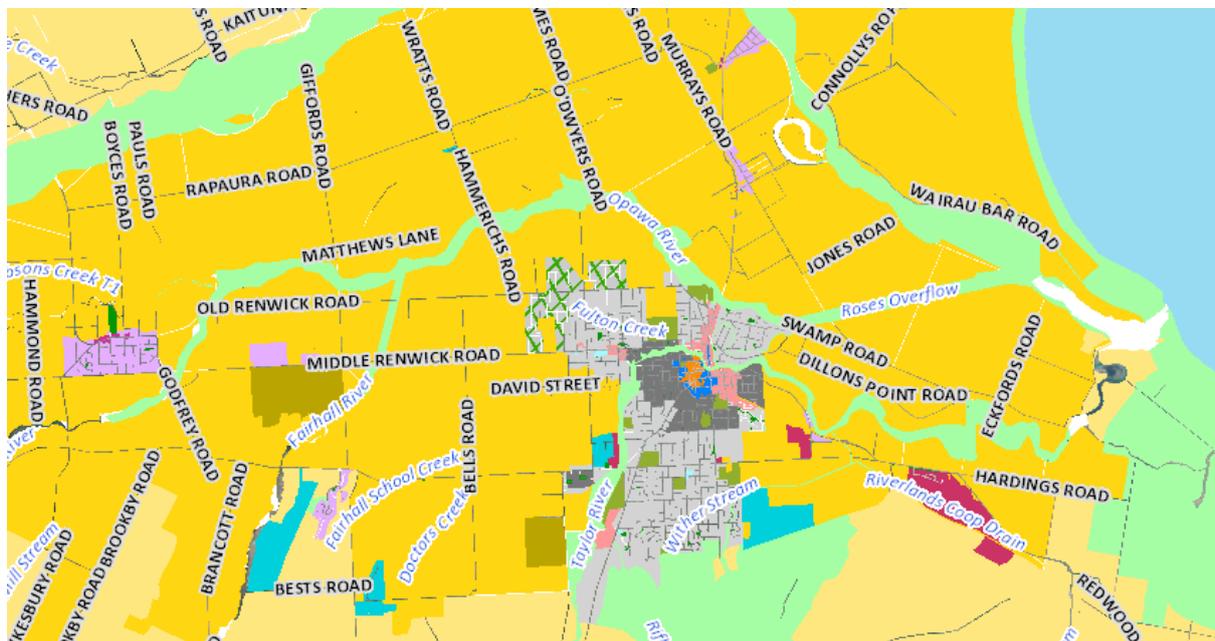
Recommendation

That an exemption process be incorporated into the NPS that provides the opportunity for local authorities to demonstrate that objective OA2 has been met through operative provisions of RPS and/or district plans.

Appendix 1: “Blenheim Urban Area”



1.1 Blenheim Urban Area. Source: Statistics NZ, Urban Area 2016 Generalised Version 2016



1.2: Blenheim Urban Area and environs zoning. Source: Wairau/Awatere Resource Management Plan.