



Statement of Submission of Porirua City Council
on the
2016 Proposed National Policy Statement – Urban Development Capacity

Statement of Submission

1. Porirua City Council thanks the Ministry for the Environment for this opportunity to make a submission on the 2016 Proposed National Policy Statement – Urban Development Capacity (“the policy”)
2. Porirua City Council understands the concerns of the Ministry and the intention of the National Policy Statement.
3. The policy is in alignment with the Councils strategic goal of achieving a growing, prosperous and regionally connected city.
4. Porirua City Council believes that it will be able to meet the policies stated with minimal effort additional to that which is already made in future planning for land for development and availability. The proposed policy simply reflects best practice.
5. Porirua City Council already works closely in a number of areas including group consultation on plan-changes, sharing socio-demographic data, sharing base assumptions for population growth.
6. We note that the wording between the current version of the Policy and its accompanying Summary document are fundamentally different. For example PA1 Summary includes the word “must” which is not used in the Policy itself, and OA1 in the Summary includes “environmental well-being”, however the Policy itself does not.
7. Porirua City Council requests that terms used in the Policy be more clearly defined. For example some areas of the Policy direct ‘local authorities’ while other areas ‘regional councils’.
8. Porirua City Council is concerned that the Policy takes an overly simplistic view of the land availability vs. affordability relationship. We believe that policies put in place to strengthen this relationship alone will not significantly alter the gap between the two unless a range of other factors are also taken account of in order to fully balance the availability-affordability nexus. These factors include:
 - investment and speculation in residential property
 - the current capacity of the construction sector
 - urban centres where core infrastructure is already at full capacity due to basic constraints, for example the availability of water or topographical or natural land hazard barriers

- The undesirability of expansion of housing development into productive agricultural land.
9. Porirua City Council views land banking as an undermining factor in maintaining land affordability, and believes that the policy will have better effect when implemented in conjunction with regulations to dis-incentivise land banking.
 10. We support our regional peers concerns that under options currently available in the Resource Management Act coupled with increased Ministerial powers proposed in the Resource Legislation Amendment Bill, the Minister is able to direct councils to amend its plans in particular ways to give effect to this Policy. This will create bottlenecks at ministerial level where Council are well placed to manage this and respond to community needs.
 11. Porirua City Council fully supports the submission by Local Government New Zealand “LGNZ draft submission 28 June – Proposed National Policy Statement on Urban Development Capacity”
 12. Porirua City Council is concerned about the expectation that infrastructure for future development capacity be provided prior to that development capacity resulting in actual demand. This will add pressure in situations where a local authority may be approaching funding limits to renew existing assets, or capacity limits with existing demand. Providing infrastructure based services for future capacity also increases the difficulty keeping clear separation in intergenerational debt.
 13. We also question the Policy’s apparent lack of regard for environmental issues and requests that Objective OA1 be amended to include provision for environmental well-being and sustainability as shown in the Summary document but not in the Policy itself.
 14. Lastly we are concerned that the Policy’s wording is so directive that that there is no capacity for interplay or balancing development with other RMA matters such as heritage, biodiversity, natural hazards, or community expectations for freshwater quality. Guidance is needed for Councils to weigh the directives in the Policy with the RMA, with existing National Policy Statements, and other instruments.

Hearing of submission

If there is to be a hearing of Submissions, Porirua City Council wishes to be heard in support of its submission.

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