



## GREAT LAKE TAUPŌ

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NPS Urban Development Capacity  
Ministry for the Environment  
P O Box 106-483  
**AUCKLAND CITY**

To whom it may concern:

### **TAUPŌ DISTRICT COUNCIL'S SUBMISSION ON THE PROPOSED NATIONAL POLICY STATEMENT ON URBAN DEVELOPMENT CAPACITY**

Thank you for the opportunity to submit on the above mentioned Proposed National Policy Statement (NPS).

I am writing on behalf of the Taupō District Council (the Council) with comments on the NPS. These comments follow below and include the Council's position generally and also on particular areas.

Please note, while elected members have viewed the comments in the submission, they have not yet been able to formally endorse them at a Council meeting. Should any amendments be proposed at the next Council meeting on 2 August 2016, we will forward those through.

#### **General comments**

1. The Council agrees with Local Government New Zealand's position in their submission, where they recommend that the NPS should only apply to local authorities with medium and high-growth urban areas. Requiring all local authorities to be covered by objectives OA1, OA2, OA3, OB1, OC1, OD1, OD2 and policies PA1, PA2 and PA3 is impractical if they are facing modest growth, a stagnant population or a decline in population. In addition, many local authorities already have sufficient capacity for future development. For example, the Council adopted a growth management strategy in 2006 called Taupō District 2050. This strategy has effectively guided development in the district in the period since and has ensured sufficient development capacity for at least 30 years.
2. It is imperative that the NPS provides clarity and certainty with regard to which local authorities it applies to. This can best be achieved by specifically listing those local authorities which fall into each category similar to table 1 (page 26) of the proposed NPS. As currently drafted the NPS creates confusion about:
  - a. Which local authorities fall within which growth category and what level of projection this is based on;
  - b. Whether local authorities can move between categories and what happens to those which are on the cusp of a threshold; and
  - c. How often the growth rate will be reassessed and the process for how a local authority might move from being in low growth to a medium growth category.

In addition, clarity is required about where the data for determining whether a local authority has a medium or high-growth urban area is sourced from. We recognise that it was necessary for Statistics New Zealand be used as source for data in the development of the NPS, however many local authorities source their own independent data. For example, the majority of local authorities in the Waikato region source their data from the National Institute of Demographic and Economic Analysis (NIDEA).

3. The definition of "Secondary Urban Area" refers to a combination of resident and visitor populations. This is very confusing for urban areas like Taupō, which has a resident population under 25,000 but can peak at a total population of around 55,000 for a short time over the Christmas and New Year period. We recommend that references to secondary urban areas are removed, or at a minimum the references to visitor population are removed to provide clarity.

#### Specific comments

4. If the proposed NPS is going to apply to all local authorities in some shape or form then the Council has the following suggestions below.
5. The definition of "sufficient" imposes a requirement to provide an additional 20% development capacity over the short and medium term demand projections. This may well be appropriate for urban areas projected to experience ongoing growth, however it could impose unnecessary costs on communities that are expecting populations to peak. As an example the population of the Taupō District is expected to peak around 2040. It would be costly and unnecessary for the Council to provide an additional 20% on top of the peak demand.
6. The definition of "infrastructure" is quite limited and largely applies to infrastructure that local authorities provide. This is at odds with other parts of the NPS such as Policy PB4 which tries to encourage collaboration between the wide range of infrastructure providers. Such collaboration is the key to efficient urban planning but it needs to include the likes of education and health infrastructure as much as water pipes and roads.
7. Policy PD5 requires regional councils to set minimum targets for the supply of sufficient development capacity. This is broadly supported, however it is suggested that district plans are the primary tool for managing the supply of development capacity, and therefore there should be the ability to set targets in district plans without using the Schedule 1 process. Furthermore, the principle of district plans setting targets for development capacity should be applied to all local authorities. This would enable a strong policy nexus between regional policy statements and district plans. Additionally, it would provide communities with certainty about the anticipated growth, and give all local authorities the certainty on which to base their infrastructure investment decisions.

If you require further information, please contact Hadley Tattle, Policy Advisor, in the first instance at [htattle@taupo.govt.nz](mailto:htattle@taupo.govt.nz) or ddi 07 376 0620.

Kind regards



Gareth Green  
**ACTING CHIEF EXECUTIVE OFFICER**