



YVONNE WEEBER SUBMISSION

National Policy Statement on Urban Development Capacity

1 INTRODUCTION

- 1.1 This is a personal submission on the proposed National Policy Statement on Urban Development Capacity (proposed NPS UDC).
- 1.2 I have primarily worked for the past 25 years in New Zealand Local Authorities and Central Government. Through this work and my training as an urban designer I have a very good understanding of the urban processes, the RMA and the responsibilities of both Central Government and Local Authorities.
- 1.3 Recently I have spent two years undertaking analysis of and writing evidence for the Auckland Council Proposed Unitary Plan.
- 1.4 I am aware as an Auckland resident considering buying a property that there is a significant increases in land prices and consequently dwelling prices. These increases have occurred in a number of urban areas in New Zealand.

2 OVERALL COMMENTS

- 2.1 I support in principle urban national policy statements (NPS) and National Environmental Standards (NES) under the RMA. These mechanisms should provide national guidance in the planning for New Zealand urban areas.
- 2.2 I am very concerned that the proposed NPS UDC simplifies the economic influence of the overall price of dwelling and business land just to land zoning. I consider that land zoning and is only one factor in a very large complex process of supply and demand for dwellings in New Zealand.
- 2.3 I consider that the proposed NPS UDC will not be effective or influence the price of land. In some areas it is foreseeable that the NPS UDC will actually increase prices of greenfield land prior to subdivision.
- 2.4 The NPS UDC will not influence the other non-RMA elements that effect the price of land or the price of New Zealand's urban dwellings. These non-RMA elements include but are not limited to land banking by developers, restrictive private property land covenants for only large expensive houses being imposed by developers and high buildings costs. These and other wider economic issues such as low interest rates and tax free gains on investment will not be addressed with the Proposed NPS UDC.

- 2.5 I consider the proposed NPS UDC won't affect the demand for dwellings. For instance this NPS will not stop the large amount number of dwellings being bought by investors both residing in New Zealand and overseas.
- 2.6 The lack of affordable dwellings for New Zealanders relates to the type of dwellings being built and by whom. Investors put further pressure on our dwelling stock. This leaves the young, old and low income New Zealanders unable to compete either in the rental or in property purchase. Increasing supply won't stabilise the present rising dwelling prices. Central Government therefore needs to deal with the demand for dwellings and help in the increase of salaries to enable purchase of dwellings. The demand for dwellings and increasing in overall salaries is clearly outside the local authorities mandate and the RMA.
- 2.7 I agree that urban environments are complex and I welcome more scientific rigour in monitoring, gathering evidence and analysis. However this proposed NPS UDC won't necessarily make urban areas work better or have a high amenity for people to live, work and play in. Planning for future housing or business development needs to be an integrated process addressing all elements that make a successful, liveable town or city.
- 2.8 I am concerned that there is nothing on the quality of the built environment being considered in the objectives and policies of the proposed NPS UDC. Good quality urban design is an essential component of the success of a town or city and needs to be an integral part of land capacity decision making. Good quality urban design has a significant influence on how people live in cities and ultimately the economic performance of cities. There are intergenerational disadvantages of creating poor quality urban areas with isolated communities, lack of multi modal transport networks, lack of social infrastructure, low quality public spaces and low dollar/time cost connection to employment. The NPS UDC has the potential to create these poor quality urban areas in the pretence of increasing the supply of dwellings.
- 2.9 I support the use of strategic urban design and spatial planning for the successful development of New Zealand's urban environment. However good quality strategic urban design and spatial planning is not just limited to solely addressing the provisions of land capacity for housing and business land. There is a great deal more to New Zealand's urban areas that requires further analysis in this NPS.
- 2.10 I m concerned that the proposed NPS UDC will promote greenfield sprawl on the edges of our towns and cities. This is not a sustainable solution for our urban areas. Sprawl will increase our carbon emissions and put further pressure on our environment. It will make housing on the edge of our cities unaffordable due to increased transport costs and put further pressure on our roads and highways. Greenfield sprawl is a lose-lose situation in respect to transport as with low density urban greenfield sprawl there is less likelihood of a good public transport system to and from these suburbs. The NPS needs to address developments with appropriate infrastructure including multi modal transport including walking, cycling and public transport.

- 2.11 I am concerned that at no point does the proposed NPS UDC actually make a clear link between creating 'sufficient residential and business development capacity' to meet demand and creating the sufficiency of affordable housing for unemployed, low wage or even medium waged New Zealanders. The proposed NPS UDC aims as stated in its preamble to '*help reduce regulatory barriers to the supply of housing and reduce the cost of housing relative to income*'. The links between the proposed NPS UDC purposes, objectives and policies are weak as there are many other non RMA barriers and costs that are barriers to the supply of dwellings.
- 2.12 I am concerned that the proposed NPS does not address the issues of infrastructure and changing social infrastructure in stagnant and declining urban areas. Not all urban areas are facing rapid growth and these areas have their own set of issues in maintenance and renewal of infrastructure and social infrastructure.
- 2.13 The proposed NPS UDC appears little more than a monitoring, collecting evidence and co-ordination of planning decisions. One wonders why this is not a NES on Urban Development Capacity?
- 2.14 I agree that all local government (both regional, local and unitary councils) need to plan and respond to growth (or decline) in relationship to land use, social infrastructure and infrastructure. This requires co-ordination and investment (both existing and planned) to enable residential and business development to occur.
- 2.15 I agree that local government needs to consider different timeframes (short, medium and long-term) of development. But I consider that during this planning local authorities must plan for carbon neutral urban growth.
- 2.16 I am concerned the timeframes as proposed in the proposed NPS do not reflect the considerable lead in time for major infrastructure and social infrastructure which often makes it difficult for local authorities to respond as quickly as suggested in the proposed NPS UDC.
- 2.17 I consider that the proposed NPS UDC should address how infrastructure and social infrastructure planning, construction and ongoing maintenance are going to be funded.
- 2.18 I consider the scope of the NPS needs to be broadened to include 'social infrastructure' and social infrastructure providers. The proposed NPS UDC preamble comments on the importance of a successful city and the need or good accessibility between dwelling, business and social infrastructure. The NPS UDC is however silent on social infrastructure. This was requested by Ministry of Education in the Regulatory Impact Statement for this proposed NPS. The co-ordination of new or future intensive housing areas with social infrastructure providers such as the Ministry of Education is vitally important. This is particularly significant when the pressure put on road infrastructure is considered in the transportation of children to and from schools. Social infrastructure placed inappropriately or too late in an urban greenfield or urban intensification area will put significant and unnecessary pressure on transport infrastructure. Social infrastructure also creates a community if it is placed in convenient locations where there is access to all not just those who can drive a motor vehicle.

- 2.19 I consider that there is a very weak links between reducing regulatory barriers and dwelling affordability. The proposed NPS UDC is not a powerful tool that will actually make urban environments work better, increase dwelling supply and increase the income of people being housed. A far wider set of RMA and non RMA tools are required to address housing affordability in New Zealand.
- 2.20 I am concerned that it is unclear to what extent the processes required under the proposed NPS, which are reasonably onerous for smaller local authorities in terms of assessments/monitoring required (for example), will duplicate or cut across similar processes that may already be undertaken or planned in some jurisdictions. There would also in the case of Queenstown Lakes District Council be a duplication in Otago Regional Council being required to understand the complexities of their Queenstown local residential market. This duplication could and will add to inconsistencies resulting in further challenges and delays in obtaining monitoring information required in this proposed NPS UDC.
- 2.21 I am concerned that there is a reliance on local authorities understanding how 'property markets' work and enabling speculative practices to be reinforced through our planning system in the proposed NPS UDC. This is a big ask for local councils when it has become clear with the present housing crisis that even Central Government have not got a clear understanding of the present 'property market'. I am concerned that this may lead Local and Regional Councils unable to stop development in areas that may be planned for future greenbelts or large parks around the city e.g. similar to Wellington City Councils greenbelt.
- 2.22 As there is no definition of what the 'market' actually is. I therefore has deleted reference to 'markets' within the NPS.
- 2.23 I am concerned that there are no methods proposed to ensure the timing of a development is released once the land is rezoned. Even more importantly there is nothing in the proposed NPS UDC giving local authorities the tools to require developers to provide housing at certain price points. The recent Housing Accords and Special Housing Areas Act 2013 (HASHA) has not made any significant change in the housing affordability crisis present in Auckland. The HASHA legislation has however shown that if there is a profit to be made when land owners up value their land through a zone change through the HASHA rezoning/consent processes and then land bank it. Subdivision consents granted through the HASHA legislation have not built houses either because the land has been on-sold to land bankers or lack of infrastructure.
- 2.24 I am concerned that from my analysis of the HASHA legislation I consider the NPS UDC will go nowhere in addressing the present housing crisis as developers have no incentives to reach a capacity level in housing. The exception is the comprehensively planned developments of Hobsonville in Auckland managed by the Hobsonville Land Company (formally a Housing New Zealand Corporation company).
- 2.25 I is concerned that the proposed NPS UDC is extremely theoretical in respect to maximum building capacity. My concern is that the zones will act as ceilings to what you can build up to. However there is nothing stopping the building of less than the zone maximum (one storey in a zone with a ten storey limit) or for that matter nothing being built at all on the up zoned land. The proposed NPS UDC monitors the maximum you can build but provides no other incentive to actually build to that maximum to realise that capacity.

- 2.26 I believe the proposed NPS UDC needs to consider calculating capacity of zoning for minimum heights being permitted for example you can only build a 5 storey minimum height building with an appropriate maximum of 2 storeys above the minimum. Alternatively a new vacant or below capacity land tax (council rate) could apply that sets a rate at the maximum development you can do on the site whatever is on the site e.g. vacant lot to only a low percentage of the development capacity having the same land tax as maximum development capacity. But once again this is not an RMA matter.
- 2.27 I believe that further guidance in the form of a National Environmental Standard is required to provide a consistent methodology for assessing capacity to reduce significant difference what could occur in calculating capacity across Local Government Authorities.
- 2.28 At worst the proposed NPS UDC could create another Manugawhai Heads wastewater debacle with local authorities out of their depths, not understanding the complexity of related infrastructure projects, building developments when there are inflationary dwelling prices, creating a Ponzi scheme for subdivision development and ultimately being taken over by commissioners when the local authority becomes bankrupt and can no longer service infrastructure loans. .
- 2.29 There can and will be divergence of views between Central, Regional and Territorial Authorities in New Zealand in relationship to how much land is required in particular for business land. Changes from brownfield land be it business or residential to a more intensive use is a fundamental in a growing urban area. Changes occur greatest in uses within buildings, building form, and lot size. The least changes occur to the block and road patterns. It is unclear if these wide ranging changes are being considered in this proposed NPS UDC.
- 2.30 I am concerned that there is no definitive definition of business land in New Zealand with each Council having different definitions and planning objectives, policies, rules and assessment criteria. It is difficult to forecast business land and there is often limited data on what will be required. Changes or the adoption of international trade agreements can have profound effects on what type and size of business land is required for manufacturer in light and heavy industry.
- 2.31 I have major concerns over the section on Responsive Environments. The policies and objectives need major re-writing as there are fundamental issues of unresolved policy in this section. A number of the policies I believe will actually increase land prices rather than decrease them. Further work is therefore required on this section.
- 2.32 Appendix 1 is a track changed version of the NPS. However I am of the opinion that there are major issues with this NPS and at this stage it should be withdrawn and further consideration with submissions given to what exactly is nationally significant and what other non RMA measures need to be considered

APPENDIX 1

TRACK CHANGES OF THE NPS UDC

KEY

Underline = new text

~~Strike through~~ = deleted text

Preamble	
<p>Words used in the preamble need to refer to dwellings instead of homes or housing,</p>	<p>A consistent language is required in the NPS rather than using multiple words for one term or inferring that this NPS deals only with standalone homes or houses. If the NPS is using the Statistics NZ definition of dwelling it needs to be consistent with the use dwellings or define what home and housing mean in the interpretation. The NPS should be undertaking a dwellings assessment rather than a housing assessment and considering dwelling affordability rather than housing affordability.</p>
Definitions and Interpretations	Position
	<p>At present a number of the definitions are unambiguous creating arguments over interpretation and ultimately court proceedings to clarify the NPS. The following changes to existing definitions and additional definitions to clarify the NPS are recommended.</p>
<p>Business land means land that is zoned for productive economic activities in urban areas, including but not limited to the following:</p> <ul style="list-style-type: none"> • industrial 	<p>Business Land should acknowledge that residential dwellings and home based occupation are productive economic activity. Consideration on how this type of economic activity was to be forecast needs further analysis.</p>

<ul style="list-style-type: none"> • commercial • retail • business and business parks • mixed use and centres, to the extent that it is available for productive economic activities. <p>but does not include residential dwellings that are also used for a productive economic activity such as home occupations.</p>	
<p>Decision-maker means all persons exercising functions and powers under the Act.</p>	<p>Clarification as to if this includes the Ministers acting in differing capacities under the RMA are required.</p>
<p>Demand means: In relation to residential development, the demand for residential dwellings within an urban area in the short, medium and long-terms, having particular regard to:</p> <ul style="list-style-type: none"> a) the total number of dwellings required to meet projected household growth; b) demand for different types of dwellings; c) the demand for different locations within the urban area; and d) the demand for different price points. <p>recognising that people will trade off (b), (c) and (d) to meet their own needs and preferences.</p>	<p>Further consideration must be given to this definition as it does not consider restrictive private land covenants on new greenfield land. These covenants explicitly force construction large floor area buildings or buildings which are unaffordable and unsustainable. The majority of the Christchurch earthquake reconstruction greenfield subdivisions have these covenants. Therefore when only one type of dwelling is being provided by the market in greenfield subdivision e.g. large, the demand for the choice of alternatives cannot be realised or analysed. Constantly building over large houses does not meet a projected household demand and makes only one preference. New greenfield subdivision should provide a true variety of house types.</p> <p>The same is essential of more intensive accommodation. There needs to be different sizes and variety of apartment, townhouses and terrace dwellings in our towns and cities.</p>

<p>In relation to business land, the demand for floor area in the short, medium and long-terms, having particular regard to:</p> <ul style="list-style-type: none"> a) the quantum of floor area to meet forecast growth in different sectors; b) the demands of both land extensive and intensive activities; and c) the demand for different locations within the urban area. 	
<p><i>Development capacity</i> means in relation to residential and business land, the capacity of land for urban development to meet demand, taking into account the following factors:</p> <ul style="list-style-type: none"> • the zoning, objectives, policies, rules and overlays that apply to the land; and • the provision of adequate infrastructure <u>and social infrastructure</u>, existing or likely to exist, to support the development of the land, having regard to— • the relevant proposed and operative regional policy statements, regional plans and district plans; and • any relevant management plans and strategies prepared under other Acts. • <u>Actual or likely funding sources and mechanisms</u> 	<p>Clarification is required on what is meant by adequate infrastructure. In addition social infrastructure needs to be added to this definition. Funding sources need to be added to this definition.</p> <p>Greater definition is required to the phrase 'likely to exist' and if this means identified in the LTP/RTLTP or by private means. Similar wording is in the HASHA legislation but councils have found it hard define and test this wording. Actual or likely funding sources and mechanisms have been added as funding is a major issue with Councils. It is not only about construction of the infrastructure and social infrastructure but also the ongoing maintenance of it.</p>

<p><u>Dwelling means any building or structure, or part thereof, that is used (or intended to be used) for the purpose of human habitation. It is a permanent structure and not a temporary structure. It does not include motels, hotels, prisons, motor homes, huts and tents.</u></p>	<p>A new definition of dwelling is required in this NPS that considers only permanent accommodation as the Statistics NZ definition of dwelling is: <i>A dwelling means any building or structure, or part thereof, that is used (or intended to be used) for the purpose of human habitation. It can be of a permanent or temporary nature and includes structures such as houses, motels, hotels, prisons, motor homes, huts, and tents.</i></p> <p>This NPS needs to consider only permanent accommodation not motels, hotels, prison, motorhomes, huts or tents (or for that matter cars).</p>
<p><u>Dwelling affordability indictor means the Statistics NZ indicator where households are spending more than 30 percent of their disposable income on housing.</u></p>	<p>A clear reference to dwelling affordability needs to be part of this NPS. It is a indicator that Statistics NZ calculates. It is important to recognise this as affordable dwellings contributes to people’s well-being. For lower-income households especially, a high cost of dwellings relative to income is often associated with severe financial difficulty. It may mean households don’t have enough money to meet other basic needs. Families who pay more than 30 percent of their income for dwellings are considered cost burdened and may have difficulty affording necessities such as food, clothing, transportation and medical care.</p>
<p>Feasible means the commercial viability of development, taking into account the current likely costs, revenue and yield of developing.</p>	<p>This definition does not take into consideration the availability of development finance or the construction sectors ability to build in a timely manner. The definition does not recognise the complexity of building, the multiple agencies involved and the interactions between these agencies.</p>
<p>High-Growth Urban Area means: Any Main Urban Area that, according to the most recent Statistics New Zealand growth projections set out in Appendix A2, is projected to experience population growth of more than 10% over the medium-term; or</p>	<p>It is recommended that these definition start at the beginning of a specific year e.g.2017 or 2018.</p>

<p>Any Secondary Urban Area that at any point in the year has a combined resident and visitor population of over 30,000, and according to the most recent Statistics New Zealand growth projections set out in Appendix A2, is projected to experience population growth of more than 10% over the medium-term.</p>	
<p>Long Term means with the next thirty years.</p>	<p>There are huge number of assumptions that will have to be made to produce a dwelling assessment by price points for 30 years in the future. Dwelling prices and personal income are very uncertain in the long term of 30 years time. The NPS UDC needs to provide guidance on these assumptions and how they are to be dealt with on a national basis. If there is an apparent supply shortfall of dwellings in 30 years time the NP UDC needs to supply further guidance on how the council response is to be triggered.</p>
<p><u>Market Activity means</u></p>	<p>A definition is required for this NPS on what market activity as you are requiring local authorities to respond to it. Or as in the remaining set of comments 'market' is removed.</p>
<p>Plan means an operative or proposed regional plan or a district plan.</p>	<p>This definition needs to include plan variation and plan change. The definition contained in s43AA of the RMA is required to avoid doubt.</p>
<p><u>Social Infrastructure:</u> is a subset of infrastructure and means the <u>organizations and services that build a community such as education providers (daycare, primary, secondary and tertiary), healthcare facilities, social service facilities, civic facilities (libraries, pools, recreation, parks, recycle and refuse).</u></p>	<p>A new definition is required to include social infrastructure as part of the urban development capacity infrastructure. An urban area with strong social infrastructure facilities, organisations and services builds a strong resilient and more sustainable community.</p>
<p><i>Sufficient</i> means the provision of enough development capacity to meet residential and business demand, plus, to take account of the likelihood that not all capacity will be developed, an additional margin of at least:</p>	<p>Further work is clearly required on the provision of margins for different urban areas such as brownfield and greenfield sites. These seem like very blunt and arbitrary figures. It would appear capacity modelling would be more appropriate through a National Environmental Standard giving an in</p>

<ul style="list-style-type: none"> • 20% over and above projected short and medium-term residential and business demand; and • 15% over and above projected long-term residential and business demand. <p>The total capacity should reflect the demands for different types and locations.</p>	<p>depth analysis of sufficient.</p>
<p><u>Sustainable urban development</u> means <u>improving the market mechanisms to achieve environmental social, cultural and economic wellbeing. This includes but is not limited to:</u></p> <ul style="list-style-type: none"> • <u>A change to growth that creates quality urban design.</u> • <u>The conservation and minimisation of the depletion of non-renewable resources.</u> • <u>Considering economic and environmental decisions together.</u> • <u>A strong consideration of the needs of future generations.</u> • <u>Creation of a resilient urban environment.</u> 	<p>Sustainable urban development should be the main aim of this NPS. Using this term in Objective 1 you have the ability to consider: compact urban form; high sustainable buildings; ecological ecosystems; sustainable infrastructure and social infrastructure.</p>
<p><i>Urban area</i> means an area with urban characteristics and a moderate to high concentration of population, irrespective of local authority boundaries.</p>	<p>This definition would appear not to cover land zoned as urban that does not have the urban characteristics. This definition will also be different in the various local authority plans. A better definition is required. This definition is also different to s76 RMA in relationship to urban environment allotments. Further work should be done on this is required so that multiple definitions of urban area are not created under the RMA</p>
<p><u>Urban Design</u> means <u>the design of the buildings, places, spaces and networks that make up our urban areas and the ways people use them. It ranges in scale from a metropolitan region, city or town down to a street,</u></p>	<p>A definition of urban design is required as the overall design of our urban areas is required under this NPS.</p>

<p><u>public space or even a single building. Urban design is concerned not just with appearances and built and urban form but with the environmental, economic, social and cultural consequences of design. It is an approach that draws together many different sectors and professions, and it includes both the process of decision-making as well as the outcomes of design¹.</u></p>	
<p>National Significance</p>	
<p>This National Policy Statement is about recognisingis about the national significance of the contribution that <u>urban areas to all New Zealanders and Te Mana o te Wai</u></p> <p><u>New Zealand's urban areas are complex systems making a significant contribution to the environmental, social, economic and cultural wellbeing of people and communities. They form an important expression of our identity including our Maori Heritage.</u></p> <p><u>The matters to which this national policy statement applies are:</u></p> <ul style="list-style-type: none"> a) <u>provision for integrated sustainable urban management, ongoing and the need to enable urban development, resilience and change of New Zealand's urban areas in order to provide for this.</u> b) <u>Environmentally sound and carbon efficient urban areas</u> c) <u>Good quality urban design</u> d) <u>Sufficient sustainable development capacity (space for dwellings, business and social infrastructure) to meet long term demand.</u> e) <u>Integration and coordination between local authority, central</u> 	<p>The National Significance statement is re-written so there are clear reasons why this NPS is being created. At present this statement is not explicit about what the NPS is actually about.</p>

¹ Modified from MfE (2005) New Zealand Urban Design Protocol-urban design definition

<p><u>government, infrastructure and social infrastructure providers.</u></p>	
<p>Objective and Policies Group A – Outcomes for decision-making</p>	
<p>OA1: To support <u>sustainable</u>, effective and efficient urban areas that enable people and communities to provide for their social, economic and cultural, <u>environmental and economic</u> wellbeing.</p>	<p>Objective OA1- Add ‘sustainable’ to the objective so that this objective provides the foundation of considering sustainable urban development. Add ‘environmental’ so that all four wellbeings are provided for in the first objective of the NPSUDC. This is part of the summary document but appears to have been removed in the final NPSUDC. Environmental wellbeing is very important to all people and communities in urban areas. Environment includes the natural environment but also the built environment of our towns and cities. Only through an effective and efficient urban environment can the other wellbeings be satisfied.</p>
<p>OA2: To provide sufficient residential <u>dwellings</u>, and business and social infrastructure development capacity to enable urban areas to meet residential <u>dwellings</u>, and business and social infrastructure demand.</p>	<p>Social infrastructure development needs to be added into this objective as our urban areas do not just require dwellings</p>
<p>OA3: To enable ongoing development and change in urban areas <u>to make sustainable urban environments with good quality urban design.</u></p>	<p>The sustainability and quality of the environments should have priority. This allows for sustainable resilient built environments to be developed. A 3 should be moved to the first policy to indicate the significance of the change required.</p>
<p>Policies PA1 to PA3 apply to all local authorities.</p>	<p>The addition of sustainable urban management is important in this policy so that dwellings and business development that meets a communities wellbeing. It is also not just about</p>

<p>PA1: By decision-makers:</p> <ul style="list-style-type: none"> • Providing for an urban form that maximises the potential for social, <u>cultural</u> and economic exchange within the urban area. • Providing for the <u>sustainable urban development and the</u> efficient use of resources, having particular regard to scarce urban land and infrastructure. • Enabling the competitive operation of land and development markets. 	<p>development for development sake. Local Authorities should be able clearly define where growth occurs in a strategic way and define greenbelts and no go areas with the urban area. The enabling competitive operation of land development markets is removed because in many instances land and development markets are not competitive e.g. if you have only one owner of land in a greenfield subdivision.</p>
<p>PA2: By local authorities providing at all times sufficient residential and business development capacity for the short, medium and long terms.</p>	<p>The NPS needs to clarify what at all time s sufficient development capacity actually means. This is particularly important due to any funding gaps with the development of new land or the redevelopment of existing urban land.</p>
<p>PA3: When considering the effects of urban development, decision-makers must:</p> <ul style="list-style-type: none"> • Recognise and provide for the contribution that urban development will make to the ability for people and communities and future generations to provide for their <u>environmental</u>, social, economic and cultural wellbeing. • Provide sufficient development capacity, whilst maximising the positive effects of development, and minimising the adverse effects of development. • Have particular regard to the positive effects of urban 	<p>This policy does not recognise that land is a finite resource. It does also not recognise that urban development should recognise the environmental wellbeing of future generations in sustainable quality built urban environments. Councils will often be unable to provide sufficient development capacity due to being land locked e.g Christchurch and Wellington or having lack of infrastructure. As there is no guidance on what the positive effects of urban development is in New Zealand this part has been deleted. The most important aspect is to provide a sustainable urban environment that has the ability through the built form to be robust and resilient to allow change over time.</p>

<p>development at a national, regional and district scale, as well as its local effects.</p> <ul style="list-style-type: none"> • <u>Provide for sustainable urban environment which is robust and resilient with good quality built form that can change over time</u> 	
<p>Objective and Policies Group B – Evidence and monitoring to support decision-making</p>	<p>Position</p>
<p>The following objectives apply to all local authorities.</p> <p>OB1: To ensure plans and regional policy statements are based on a robust, accurate and frequently-updated evidence base.</p>	<p>We support this Objective as this is consistent with RMA ad LGA requirements.</p>
<p>Policies PB1 to PB5 and PC1 to PC3 apply to all local authorities that have part, or all, of either a Medium Growth Urban Area or High Growth Urban Area within their jurisdiction.</p> <p>PB1: Local authorities must, by the end of 2018, or within 12 months of becoming a Medium or High Growth Urban Area, and thereafter on at least a <u>five</u> three-yearly basis, carry out:</p> <ul style="list-style-type: none"> • A Housing <u>Dwelling Needs</u> Assessment that estimates the demand for dwellings, including the <u>interaction of demand and supply capacity</u> of different groups in the population for different types of dwellings, locations and price points, and the supply of development capacity to meet that need demand, in the short, medium and long-terms; and • A Business Land <u>Needs</u> Assessment that estimates the 	<p>A substantial amount of further work is required on this policy. There is an interaction between demand and supply. The present wording suggest that both are fixed and somehow Local Authorities have control of both.</p> <p>Monitoring requirements should be explicitly referenced in s.35 of the RMA. This would allow any cost incurred to be charged under S 36 of the RMA.</p>

<p><u>interaction of demand and supply</u> for the different types and locations of floor area for the local business sectors, and the supply of development capacity to meet that demand, in the short, medium and long-terms <u>needs</u>.</p> <p>Local authorities must have regard to the benefits of publishing the assessments under policy PB1.</p>	
<p>PB2: In carrying out the assessments required under policy PB1, local authorities must have particular regard to:</p> <ul style="list-style-type: none"> • Demographic change, including population growth and household size projections using the most recent Statistics New Zealand growth projections set out in Appendix A2. • Future changes in the sectoral composition of the local economy and the impacts that this might have on residential and business demand. • Information on the market's response to planning obtained through monitoring under PB5. 	<p>While useful the inclusion of the table in Appendix 2 table locks local authorities into a single view of the future. Past population projections of local councils have shown to be inaccurate with rapid increase or decline often occurring due to unforeseen circumstances such as an earthquake or the closure of a major employment business. There is an assumption that market outcomes will be efficient and equitable and that our present market flaws and housing crisis will be solved by further competition. Market outcomes will not provide a housing distribution across different social needs. Desirable outcomes of affordable housing are not guaranteed. The market is imperfect and requires further legislation and regulation to introduce equity resolution.</p>
<p>PB3: In carrying out the assessments required under policy PB1, local authorities must estimate the sufficiency of development capacity provided by its plans and proposed and operative regional policy statements, having particular regard to:</p> <ul style="list-style-type: none"> • The cumulative effect of all zoning, objectives, policies, rules and overlays in plans, and the effect this will have on opportunities for development being taken up. 	<p>There is a duplication of what is sufficient and additional development requirements. The Government needs to provide clear guidance of what they are actually requiring Local Authorities to monitor.</p>

<ul style="list-style-type: none"> • The actual and likely availability of infrastructure. • The current physical and commercial feasibility of development capacity. • The likelihood of opportunities for development being taken up. <p>and must estimate the additional development capacity needed if any of these factors indicate that the supply of development capacity is not likely to meet demand in the short, medium or long term.</p>	
<p>PB4: In carrying out the assessments required under policy PB1, local authorities must consult <u>work</u> with infrastructure providers, community and social-housing dwelling providers, the property development sector and any other stakeholders as they see fit.</p>	<p>Consultation has a specific legal meaning and Local Authorities don't necessarily want to undertake statutory consultation with different stakeholders.</p>
<p>PB5: To ensure that local authorities are well-informed about the market's response to planning, Local authorities must monitor a range of indicators on a quarterly basis, or as frequently as possible, including:</p> <ul style="list-style-type: none"> • <u>Carbon emissions of building and transport related to new dwellings and business.</u> • <u>The quality, type, size, universal access and sustainability</u> 	<p>Further work is required on the type of indicators that are going to be monitored. A number of indicators have been included in PB5. Monitoring requirements should be explicitly referenced in s.35 of the RMA. This would allow any cost incurred to be charged under S 36 of the RMA.</p>

factors of dwellings being constructed or retrofitted.

- The relative affordability of dwellings, including the ratio of house price to income and the relative cost to rent;
- The increase or decrease in house prices and rents;
- The number of resource and building consents granted relative to the growth in population;
- The number of houses actually constructed after gaining consent
- Areas of greenfield or brownfield land being land banked
- Transport times and costs (of all modes of transport) to and from residential areas and main areas of work
- Social infrastructure being provided in new areas of development
- Vacancy rates in the different types of business land;
- The ratio of the value of land between different land types rural and urban zoned land; and
- The ratio of the value of improvements to the value of land within the urban area.

~~Local authorities must have regard to the benefits of publishing the results of its monitoring under policy PB5.~~

Objective and Policies Group C – Coordinated evidence and decision-making	
<p>OC1: To promote coordination within and between local authorities, <u>social infrastructure</u> and infrastructure providers in urban areas, consistent planning decisions, integrated land use and infrastructure planning, and responsive planning processes.</p>	<p>It is unclear in Group C Objective and Policies what happens if the Local Authorities, social infrastructure and infrastructure providers disagree. There appears to be the view that these parties will all agree. There needs to be guidance on what happens if agreement is not practical.</p>
<p>PC1: When developing plans and regional policy statements to implement this National Policy Statement, local authorities must consult with other local authorities, local infrastructure <u>and social infrastructure</u> providers and central government infrastructure <u>and social infrastructure</u> providers that share jurisdiction over a Medium Growth Urban Area or a High Growth Urban Area.</p>	<p>It is unclear in Group C Objective and Policies what happens if the Local Authorities, social infrastructure and infrastructure providers disagree. There appears to be the view that these parties will all agree. There needs to be guidance on what happens if agreement is not practical.</p>
<p>PC2: The relevant local authorities and infrastructure <u>and social infrastructure</u> providers will work together to agree on data and projections used in the development of the assessments required under policy PB1.</p>	<p>It is unclear in Group C Objective and Policies what happens if the Local Authorities, social infrastructure and infrastructure providers disagree. There appears to be the view that these parties will all agree. There needs to be guidance on what happens if agreement is not practical.</p>
<p>PC3: The relevant local authorities, <u>social infrastructure</u> and infrastructure providers will work together to, as far as possible, ensure coordinated land use planning and infrastructure provision, including expected levels of service</p>	<p>It is unclear in Group C Objective and Policies what happens if the Local Authorities, social infrastructure and infrastructure providers disagree. There appears to be the view that these parties will all agree. There needs to be</p>

for infrastructure.	guidance on what happens if agreement is not practical.
Objectives and Policies Group D – Responsive planning	
OD1: To ensure that planning decisions enable urban development in the short, medium and long-terms.	The Local Authority should be responding to the evidence that they gathered not to the market activity. Market Activity will not provide affordable housing however evidence gathered could with appropriate legislation allow Local Authorities to direct the market to provide it.
OD2: To ensure that in the short and medium terms local authorities adapt and respond to market activity <u>the evidence obtained in their co-ordinated evidence gathering.</u>	
<p>Policies PD1 to PD4 apply to all local authorities that have part, or all, of either a Medium Growth Urban Area or High Growth Urban Area within their jurisdiction.</p> <p>PD1: When the evidence base or monitoring obtained in accordance with policies PB1 to PB5 indicates that development capacity is not sufficient in any of the short, medium or long terms, local authorities must respond by providing further development capacity in accordance with policies PD2 and PD3 as soon as possible.</p>	It is consideration of the short term would be impossible to achieve through plan changes and infrastructure requirements.
PD2: A local authority must consider all options available to it under the Act to enable sufficient development capacity to meet residential and business demand, including but not limited to:	This is too detailed and prescriptive. This is an unnecessary level of detail as there could be other options under RMA or other legislation that may allow capacity to be developed. There is also the assumption that the Local Authority is the only player is defining demand and supply of residential and

<ul style="list-style-type: none"> ● Changes to plans and regional policy statements, including changes to: <ul style="list-style-type: none"> ○ Objectives, policies and rules, zoning and the application of those in both existing urban and undeveloped areas; ○ Activity status; ○ Provisions about the notification of applications for resource consent; ○ Existing overlays, or the introduction of overlays which enable development; and ○ Make them simpler to interpret. ● Consenting processes that are customer focused and coordinated within the local authority; and ● In granting consent, the conditions of consent imposed. 	<p>business demand.</p> <p>More thought is required to the following policy.</p>
<p>PD3: Local authorities must consider the following responses:</p> <ul style="list-style-type: none"> ● In the short term, further enable development through customer-focused consenting processes and, where appropriate, amending the relevant plans. ● In the medium term, amending the relevant plans and policy statements to provide more development 	<p>More thought is required to the following policy as it gives the potential of inflationary effect of land prices if implemented. This policy will in effect increase land prices.</p>

<p>capacity.</p> <ul style="list-style-type: none"> • In the long term, providing a broad indication of the location, timing and sequencing of development capacity in order to demonstrate that it will be sufficient. 	
<p>PD4: In giving effect to policy PD1 with respect to residential development capacity local authorities should have particular regard to enabling capacity:</p> <ul style="list-style-type: none"> • In the locations that the <u>Dwelling</u> Housing Needs Assessment, required under policy PB1, indicates are of highest demand; and • That is feasible. <p>such that it maximises the contribution to meeting demand for residential development.</p> <p>Local authorities that have a Medium Growth or High Growth Urban Area within their jurisdiction should not restrict their responses to meeting demand to only the area that lies within the Medium Growth Urban Area or High Growth Urban Area.</p> <p>Policies PD5 to PD9 apply to all local authorities that have part, or all, of a High Growth Urban Area within their jurisdiction.</p> <p>Regional councils must have amended their proposed and operative</p>	<p>Schedule 1 of the RMA are important process to be maintained to provide community input into decision making processes.</p>

<p>regional policy statement to give effect to policies PD5 to PD6 by:</p> <ul style="list-style-type: none"> • The end of 2018; or • Earlier if the <u>Dwelling</u> Housing Assessment required under policy PB1 shows development capacity is insufficient to meet demand; or • Within 12 months of becoming a High Growth Urban Area. <p>Regional councils must amend their proposed and operative regional policy statements to give effect to policies PD5 to PD6 in accordance with section 55(2A) of the Act without using the process in Schedule 1 of the Act.</p>	
<p>PD5: Regional councils must set minimum targets for the supply of sufficient residential development capacity that must be achieved, in accordance with its <u>Dwelling</u> Housing Assessment, and incorporate these into the relevant regional policy statement.</p> <p>These minimum targets must specify:</p> <ul style="list-style-type: none"> • The total number of dwellings; and • Different types of dwellings. <p>To take account of the likelihood that not all capacity will be developed, it must require an additional margin of at least:</p>	<p>A number of issues have to be resolved with this policy. These timeframes from Regional Council to Local Council plans and policies will not be able to be met. Schedule 1 of the RMA are important process to be maintained to provide community input into decision making processes.</p>

<ul style="list-style-type: none"> ● 20% over and above projected short and medium-term demand; and ● 15% over and above projected long-term demand. 	
<p>PD6: A regional council's minimum targets set under policy PD5 must be set for the medium and long terms, and must be reviewed every three <u>five</u> years. When a regional council's <u>Dwelling Needs Housing Assessment</u> required under policy PB1 shows that the minimum targets set in the regional policy statement are insufficient to meet demand, regional councils must revise those minimum targets in accordance with policy PD5 and incorporate those targets into its regional policy statement in accordance with section 55(2A) of the Act without using the process in Schedule 1 of the Act.</p> <p>Local authorities shall give effect to policies PD7 to PD9 within the following timeframes:</p> <ul style="list-style-type: none"> ● By the end of 2018; or ● Within 12 months of becoming a High Growth Urban Area. 	<p>A number of issues have to be resolved with this policy. Schedule 1 of the RMA are important process to be maintained to provide community input into decision making processes.</p>
<p>PD7: Local authorities must provide a future <u>produce a land supply release</u> and intensification strategy alongside the relevant plans and regional policy statements to demonstrate that there will be sufficient development capacity in the medium</p>	<p>Councils do not necessarily 'release' land.</p>

<p>and long terms, and that minimum targets will be met.</p>	
<p>PD8: The future land release and intensification strategy must:</p> <ul style="list-style-type: none"> • Identify the location, timing and sequencing of future development capacity over the long term; and • Provide a process for flexible implementation. 	<p>There is an overlap with spatial planning in this policy. A number of issues have to be resolved with this policy.</p>
<p>PD9: In developing this strategy, local authorities must:</p> <ul style="list-style-type: none"> • Be informed by the <u>Dwelling</u> Housing Assessment and Business Land Assessment required under policy PB1; • Take into account the views of infrastructure providers, land owners, the property development sector and any other stakeholders as they see fit; and • Have particular regard to policy PA1. 	<p>A number of issues have to be resolved with this policy.</p>

