



Planning for successful cities

A proposed National Policy Statement on
Urban Development
SUMMARY OF SUBMISSIONS



MINISTRY OF HOUSING
AND URBAN DEVELOPMENT



Ministry for the
Environment
Manatū Mō Te Taiao

New Zealand Government

This document may be cited as: Ministry for the Environment. 2020. *Proposed National Policy Statement on Urban Development: Summary of submissions*. Wellington: Ministry for the Environment.

Published in May 2020 by the
Ministry for the Environment
Manatū Mō Te Taiao
PO Box 10362, Wellington 6143, New Zealand

ISBN: 978-1-98-857983-2 (online)

Publication number: ME 1497

© Crown copyright New Zealand 2020

This document is available on the Ministry for the Environment website: www.mfe.govt.nz.



*Making Aotearoa New Zealand
the most liveable place in the world*

Contents

Introduction	5
Purpose	5
Proposals for change	5
Consultation and engagement	5
Social media feedback	6
Feedback from hapū and iwi/Māori	6
Approach to analysis	7
How to read this document	7
Overview of submissions	9
Common themes across NPS-UD topics	10
Delivering quality urban environments and making room for growth	11
Targeting cities that would benefit most	14
Future Development Strategies	15
Describing quality urban environments	18
Amenity values in urban environments	20
Enabling opportunities for development	22
Ensuring plans provide for expected levels of development	24
Providing for intensification	26
Providing for further greenfield development	28
Removing minimum car parking requirements	30
More directive intervention to enable quality urban development	32
Using market information to make decisions	34
Preparing a Housing and Business Development Capacity Assessment (HBA)	35
Taking into account issues of concern to iwi and hapū	37
Coordinated planning	39
Alignment with other national direction	41
List of submitters	44
Consultation questions	53
Glossary and commonly used acronyms	57

Tables

Table 1:	Number of submissions, by submitter type	9
Table 2:	Themes in feedback on the NPS-UD discussion document	11
Table 3:	List of submitters	44

Figures

Figure 1:	Number of responses to each question	10
Figure 2:	Responses to questions on support for an NPS-UD	12
Figure 3:	Responses to questions on targeting policies	14
Figure 4:	Responses to questions on changes to FDSs	16
Figure 5:	Responses to questions on providing national level direction	19
Figure 6:	Responses to questions on amenity values	21
Figure 7:	Responses to questions on enabling opportunities for development	23
Figure 8:	Responses to questions on ensuring plan content provides for expected levels of development	25
Figure 9:	Responses to questions on enabling intensification	26
Figure 10:	Responses to questions on greenfield development	28
Figure 11:	Responses to questions on car parking	31
Figure 12:	Responses to questions about more direct intervention in local authority plans	33
Figure 13:	Responses to questions on local authorities using market information	34
Figure 14:	Responses to questions about changes to the HBA policies	36
Figure 15:	Responses to questions on engagement with iwi, hapū and whānau	38
Figure 16:	Responses to questions on working with iwi, hapū and infrastructure providers	40

Introduction

Purpose

This report summarises the submissions and feedback the Ministry for the Environment (MfE) and the Ministry for Housing and Urban Development (HUD) received during consultation on a proposed National Policy Statement for Urban Development (NPS-UD). Copies of the submissions received are available on MfE's website: <https://www.mfe.govt.nz/consultations/npsurbandevlopment>.

Proposals for change

A discussion document, *Planning for successful cities*, set out the purpose of the NPS-UD, proposals and context – including an assessment of how well the current system is performing against the Government's urban development objectives. View the full discussion paper on MfE's website: <https://www.mfe.govt.nz/consultations/npsurbandevlopment>.

The proposed NPS-UD aims to help local authorities plan for how their cities develop by directing how they make decisions under the Resource Management Act 1991 (RMA) – including when developing regional policy statements, regional plans and district plans, and making decisions on resource consents.

The NPS-UD will replace the National Policy Statement on Urban Development Capacity 2016 (NPS-UDC 2016). The new NPS-UD will build on many of the existing requirements for greater development capacity, but it will also broaden the focus of the NPS-UDC 2016 and add significant new content.

The discussion document proposed an NPS-UD with objectives and policies on the following topics:

- **Future Development Strategy** – long-term planning to accommodate growth and ensure well-functioning cities.
- **Making room for growth in RMA plans** – allowing for growth 'up' and 'out' by ensuring that RMA plan rules do not unnecessarily constrain growth and that intensification contributes to a quality urban environment.
- **Evidence for good decision-making** – evidence about land and development markets informs planning decisions.
- **Engagement on urban planning** – emphasises opportunities for iwi and hapū to voice their concerns about planning proposals, and encourages local authorities to consult with infrastructure providers to ensure sufficient development capacity.

Consultation and engagement

From July to October 2019, officials from MfE and HUD met with key stakeholders, including hapū and iwi, councils and members of the public. Most engagement happened during the official public consultation period, from 21 August to 10 October 2019, with some pre-consultation from July.

During the pre-consultation period, MfE and HUD officials held two workshops with councils from the 'medium growth' and 'high growth' categories under the existing NPS-UDC. This gave council staff the opportunity to discuss and query proposals before the release of the discussion document, and in the company of similarly targeted councils.

During the consultation period, officials engaged with key stakeholders and councils across major urban centres (MUCs) including Auckland, Tauranga, Christchurch, Queenstown, Hamilton and Wellington.

There was also a series of 'joined-up' public meetings where MfE and HUD officials toured the country, consulting on a suite of government policies simultaneously. Feedback on the NPS-UD proposals was generally positive. The recurring themes were:

- the need to include direction on urban design, climate change and public transport
- requests for longer planning timeframes, especially for Future Development Strategies
- concerns about possible conflicts with other national direction and the effects of development on the environment.

Hui with iwi and hapū representatives were also organised through the joined-up approach, across multiple policy topics. Recurring themes included the need to:

- resource and support iwi in resource management processes
- reflect Māori heritage in urban spaces
- monitor the cultural impacts of urban development.

Social media feedback

On its social media pages, MfE asked individuals for their opinions on how we should plan for the future growth of New Zealand's cities. Feedback often related to the definition of a quality urban environment and proposed amenity values.

Recurring themes included requests for:

- improved public transport systems
- more plants and green buildings
- more community parks and events
- waste reduction facilities and regulations
- intensification.

Feedback from hapū and iwi/Māori

We received a limited number of submissions from hapū and iwi/Māori during consultation. The submissions we did receive generally supported the intent of the NPS-UD, particularly the engagement proposals and the Future Development Strategy provisions.

We sought and received two additional submissions from iwi/Māori outside the formal consultation period. Received in February 2020, these submissions were from the SmartGrowth Combined Tangata Whenua Forum and the Taranaki Whānui ki Te Upoko o Te Ika/Port Nicholson Block Settlement Trust. This report does not take into account the content

of these two submissions, but they have informed the following paragraphs, the recommendations and decisions report, and subsequent policy development.

On the policy detail, submissions suggested changes, including removing or amending the proposed 'greenfields' policy and recognising Māori sites of significance in urban areas. Some submitters sought more consideration of opportunities for papakāinga and kaumatua housing (housing for the elderly), and requested that the development capacity of Māori land on the urban fringe be taken into account.

Another theme was the call for urban planning to focus more on the natural environment, and for environment-specific provisions in the NPS-UD. Submitters wanted to ensure that those giving effect to the NPS-UD would also give effect to outcomes for freshwater, particularly the outcomes already agreed to as part of community processes.

Submissions sought balance and alignment with other national direction, particularly the proposed National Policy Statement on Highly Productive Land and the proposed National Policy Statement on Indigenous Biodiversity.

Submissions, including from Te Rūnanga o Ngāi Tahu and Waikato Tainui:

- sought recognition and prioritisation of their status as partners to the Treaty of Waitangi (te Tiriti o Waitangi)
- called for urban planning and development to occur in a way that heard the voices of mana whenua, in the policy and in the development of the policy statement.

Approach to analysis

Analysis involved separating general issues from those relating to specific suggestions or provisions. We aggregated submission points on a common theme, to enable an assessment of the range of views. We then analysed and evaluated the merits of these points.

We have not addressed all submissions, or submission points, individually in this report. We have grouped submissions into themes based on the topic and the associated questions in the discussion document.

How to read this document

This summary sets out themes raised by submitters on the proposed NPS-UD discussion document. Themes have been organised under headings that correspond to a question in the discussion document. The quotes illustrate some of the key themes. We have edited some quotes for clarity.

The document summarises views from different sectors. In many cases officials have made a judgement on which is the most appropriate sector for a submitter. The aim is to give an indicative assessment of the views of groups.

Some submitters commented on topics that were not directly part of a response to a question. Analysts have taken that information and collated it by topic and assessed support for it. Therefore, the number of responses to a topic may not match the number of responses to a specific question.

Many submitters did not explicitly state their support. In these cases, analysts assessed the level of support. Submitters often requested changes, so the interpretation of 'support' is somewhat subjective. For the purpose of this document, 'somewhat' includes support for the intent, if not the wording, of the policy. 'Unclear' means that the submitter addressed the question but may not have clearly indicated their position on the policy.

Overview of submissions

This section is an overview of the submissions and their themes. In total, we received 256 submissions, representing interests from a range of sectors and perspectives.

Table 1: Number of submissions, by submitter type

Submitter type	Number
Academic/research community	8
Business/industry	18
Central government	2
Crown entity	9
Developer	15
Environmental NGO/heritage/community	26
Horticultural sector	2
Individual	80
Infrastructure provider	17
Local government	43
Hapū/iwi/Māori	8
Planning/urban design professional	18
Professional bodies	10
Total	256

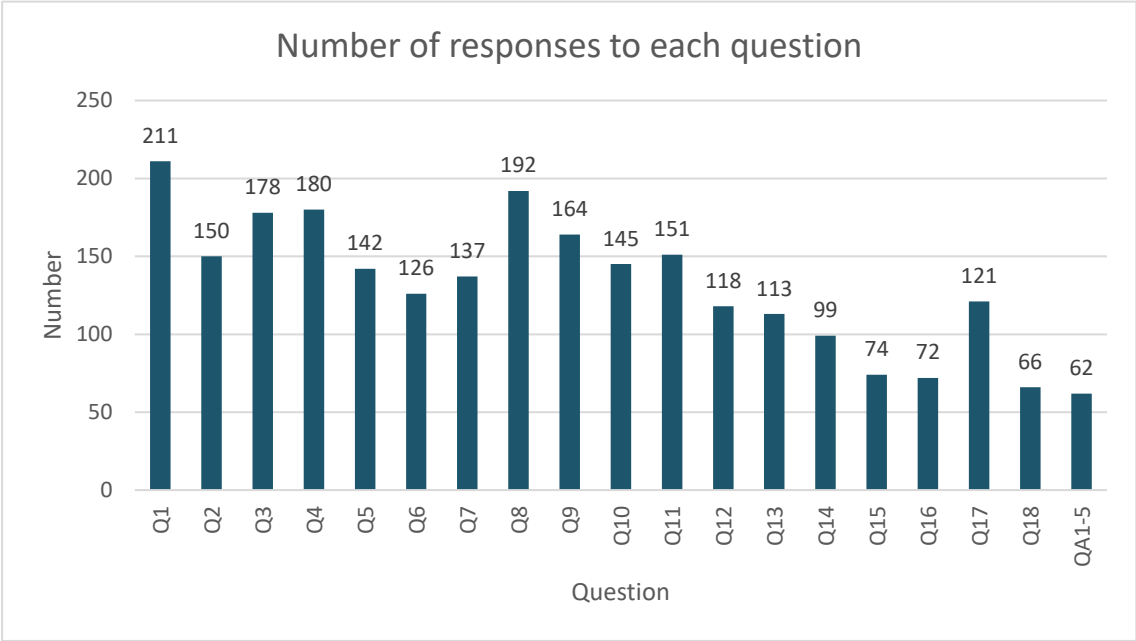
The questions (summarised here) that received the most comments were:

- Q1: Do you support an NPS-UD?
- Q3: Do you support the proposed changes to Future Development Strategies?
- Q4: Do you support the proposed approach providing national level direction about the features of a quality urban environment?

Figure 1 shows the number of responses to each question in the discussion document.

[View all consultation questions](#)

Figure 1: Number of responses to each question



Common themes across NPS-UD topics

Support

In this group, submitters largely supported the intent of an NPS-UD, and the objectives and policies in the discussion document. They were generally supportive of the policies, for the following reasons:

- an NPS is an appropriate tool to help provide for quality urban environments
- intensification should occur close to public transport, employment and other amenities
- it makes sense to target policies where the housing challenges are greatest
- it will minimise the compliance costs for smaller local authorities
- evidence-based, strategic decision-making will help ensure that development meets demands.

Oppose

These submitters generally opposed the policies for the following reasons:

- a one-size-fits-all approach is not appropriate or likely to be effective because each local area has different needs and priorities
- the status quo effectively addresses the issues that the policy aims to fix.

Table 2: Themes in feedback on the NPS-UD discussion document

Theme	Feedback
Scope of objectives and policies	The NPS-UD should focus on intensification in existing urban areas and not greenfield development. Widen the scope of many objectives and policies to include elements such as climate change, heritage value and natural hazards.
Clarity of objectives and policies	Clearer objectives and policies will make the NPS-UD work better.
One-size-fits-all approach	A standardised approach may not be effective because each local area has different needs and priorities.
Infrastructure provision/funding	The effectiveness of the NPS-UD depends on infrastructure, both social and physical, to meet growth objectives. Coordinate infrastructure planning with central government.
Alignment with other national direction under the RMA	Clearly align the NPS-UD with other national direction. Inconsistencies risk undermining the intent. Local authorities sought direction on how to make trade-offs between different national direction instruments, rather than having to make these trade-offs at a local level.
Timeframes	Align the policy timeframes with local authority planning practices. This will reduce compliance costs, mitigate engagement fatigue, and take into account the complexity of decision-making.
Cost of engagement policies	The engagement policies would put resource pressures on affected parties (particularly Māori). Provide support to ensure meaningful engagement.
Reverse sensitivity	Objectives and policies need to weigh the effects of reverse sensitivity.

Delivering quality urban environments and making room for growth

See page 16 of the [discussion document](#).

What was proposed

The public were invited to comment on their level of support for a National Policy Statement on Urban Development that aims to deliver quality urban environments and make room for growth.

The question

Q1: Do you support a National Policy Statement on Urban Development that aims to deliver quality urban environments and make room for growth?

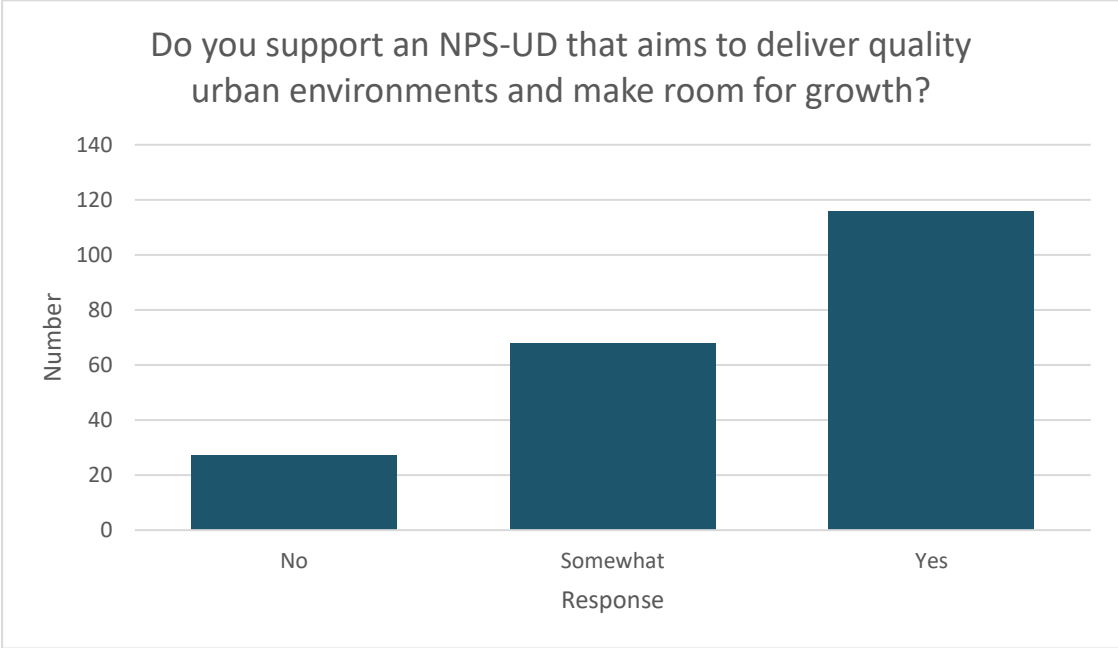
(Q1 included other questions: [see the full text](#).)

Summary of responses

Submitters were largely supportive of the proposal. Of the 211 responses, 87 per cent either fully supported or somewhat supported it.

Figure 2 shows the number of submissions by their response to the questions on support for an NPS-UD.

Figure 2: Responses to questions on support for an NPS-UD



Support the proposal

These submitters were largely supportive of the NPS as an instrument to help provide for quality urban environments. Some noted that intensification should be close to public transport and other amenities.

“An NPS is an appropriate approach and in general the current NPS-UDC has proved useful in raising broader awareness of the need for forward planning for growth and providing a robust approach to assess capacity.” – **Dunedin City Council**

Many wanted the NPS-UD to be less prescriptive and provide flexibility for local authorities. They noted that each local authority has different priorities and needs.

“The councils are concerned that the drafting of the NPS in places does not currently recognise that each area in the country is different, and requires contextual and community-based application.” – **Wellington City Council**

Some said the NPS-UD should place more emphasis on environmental factors.

“The document should give greater consideration to the effects of climate change on the urban environment, and how urban environments can support a low-carbon economy.” – **Christchurch City Council**

Many noted the importance of central government support, such as investment in infrastructure, to help achieve the aims of the NPS-UD.

Some submitters stressed that development should not be at the expense of other productive land uses.

“Allowing for urban expansion must not come at the expense of highly productive soils for food production. This will result in the reduction of land for food growing purposes and irreversible loss of that land for food production.” – **New Zealand Kiwifruit Growers Inc.**

Many suggested amendments to clarify the objectives and policies.

Oppose the proposal

The most common issue for this group was that a standardised approach would be ineffective. They called for a flexible approach to allow councils to respond to local needs. Some noted it was not clear what problems the NPS-UD was trying to resolve, and others that the issues could be resolved using existing planning instruments.

Sector views

The following is a snapshot of views from sectors that had a strong interest in this topic, or made substantive comments.

- **Hapū/iwi/Māori** largely supported the intent of the proposal. Some stressed the importance of the NPS-UD not affecting existing rights and agreements. Others suggested using te ao Māori (Māori world view) to help guide quality urban development.
- **Local authorities** raised concerns about the clarity of the NPS-UD objectives and policies, the standardised approach, and providing infrastructure to support development. They also noted that many of the policies required further work.
- **Businesses/industries** supported the approach to deliver quality urban environments, with some stressing the need for joined-up provision of infrastructure. Some noted that urban development should not come at the expense of other productive land uses. Others noted the need to manage the impacts of reverse sensitivity.
- **Professional bodies** largely supported the proposal, but raised concerns about the clarity of the NPS-UD objectives and policies, and their relationship with other national direction.

“The NPSs need to effectively integrate to enable issues related to urban development, housing, freshwater, food production, climate change to be addressed in a coordinated manner. NZPI submits that the draft NPSUD – and the companion NPS on Highly Productive Land (NPS HPL) –and the relationships between these and other NPSs – are highly problematic and require significant further work.” – **New Zealand Planning Institute (NZPI)**

- **Individuals** were largely supportive of the proposal. Some noted that intensification should be near amenities and allow local community aspirations to be considered. Many indicated a strong interest in more affordable housing, and development that improves wellbeing. The perceived constraint on local decision-making was a concern for some.

“Affordable housing remains a major challenge for New Zealand, especially younger people. Developing more and smaller places to live which are close and accessible to jobs, education and services needs to be encouraged in all New Zealand towns and cities.”
– **Anonymous**

Targeting cities that would benefit most

See page 19 of the [discussion document](#).

What was proposed

The proposal targets the most directive NPS-UD policies at major urban centres (MUCs), the largest and fastest growing urban environments.

The question

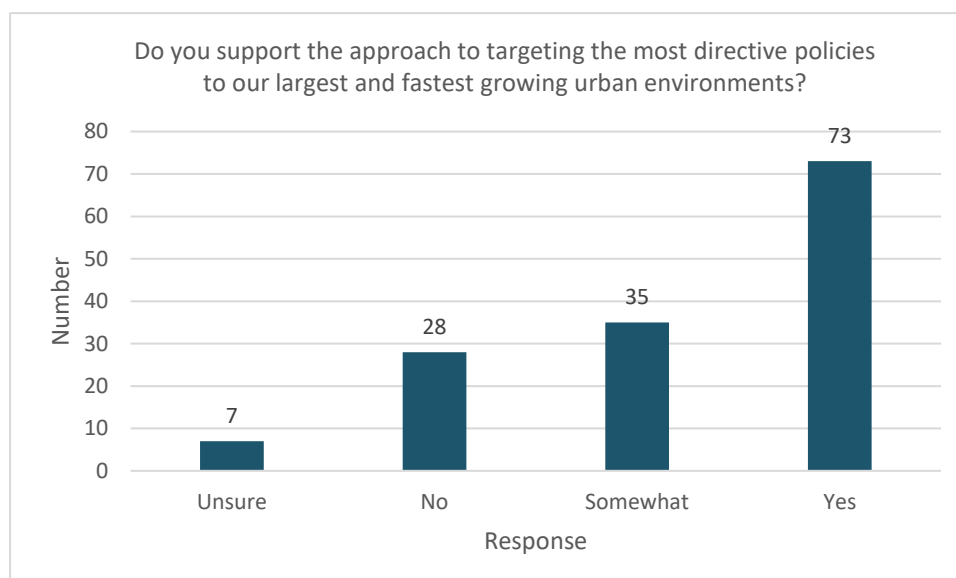
Q2: Do you support the approach of targeting the most directive policies to our largest and fastest growing urban environments?

(Q2 included other questions: [see the full text](#).)

Summary of responses

Submitters were largely supportive of the proposal. Of the 143 responses, 76 per cent either fully supported or somewhat supported it. Figure 3 shows the number of submissions by their response to the questions on targeting policies.

Figure 3: Responses to questions on targeting policies



Support the proposal

These submitters largely supported the proposal, noting that it makes sense to target the most directive policies where the greatest housing challenges are. They also suggested that this should minimise the resource strains on small local authorities.

“[We support] the approach of targeting the most directive policies to New Zealand’s largest and fastest growing urban environments. The NPS-UD should avoid imposing significant costs on small local authorities with limited resources.” – **Wine Marlborough**

Some suggested that some policies required only for major urban centres, such as the Future Development Strategy (FDS) and Housing and Business Development Capacity Assessment (HBA), should also apply to medium-growth urban environments.

The policy would not be as directive as for MUCs, but would encourage the development of medium density intensification areas where appropriate...The policy approach should also "strongly encourage" the preparation of a Future Development Strategy (FDS) for such areas as well as being required to undertake housing and business monitoring and reporting. – **Nelson City Council/Te Kaunihera o Whakatū and Tasman District Council**

As with other policy areas, the standardised approach was a concern for some. They said that the different local needs of each MUC should be taken into consideration.

Some submitters suggested amendments, such as a regular review of NPS-UD policies to take into account how cities grow and change over time. Others sought changes to the wording of the policy.

Oppose the proposal

Some submitters opposed targeting because they wanted the policies to cover all councils and cities, not just MUCs. Consistent with opposition to other policy areas, some said the NPS-UD should avoid standardised solutions.

Sector views

- **Local authorities** were largely supportive. Some noted that the NPS-UD would need to clarify the application of policies to smaller councils within an MUC. Others were concerned about the standardised approach, or said some policies should also apply to medium-growth authorities.

“ORC understands and supports the intent of the approach to integrate land use and transport planning, reduce car dependence and better support the use of alternative transport modes. However, Queenstown’s unique setting will make compliance with these requirements challenging and may result in unintended consequences.”

– **Otago Regional Council**

- **Infrastructure providers** were largely supportive, and suggested that targeting MUCs would help the industry plan for infrastructure where it is most needed.
- **Professional bodies** were largely supportive, but stressed that different MUCs have different priorities that should be considered.

Future Development Strategies

See page 21 of the [discussion document](#).

What was proposed

The proposal requires major urban centre (MUC) councils, and encourages other local authorities, to complete a Future Development Strategy (FDS) every three years. The FDS will demonstrate how, in the medium and long term, the local authority will:

- achieve quality urban environments
- meet bottom lines for residential development capacity
- allocate development capacity across existing and future urban areas.

The question

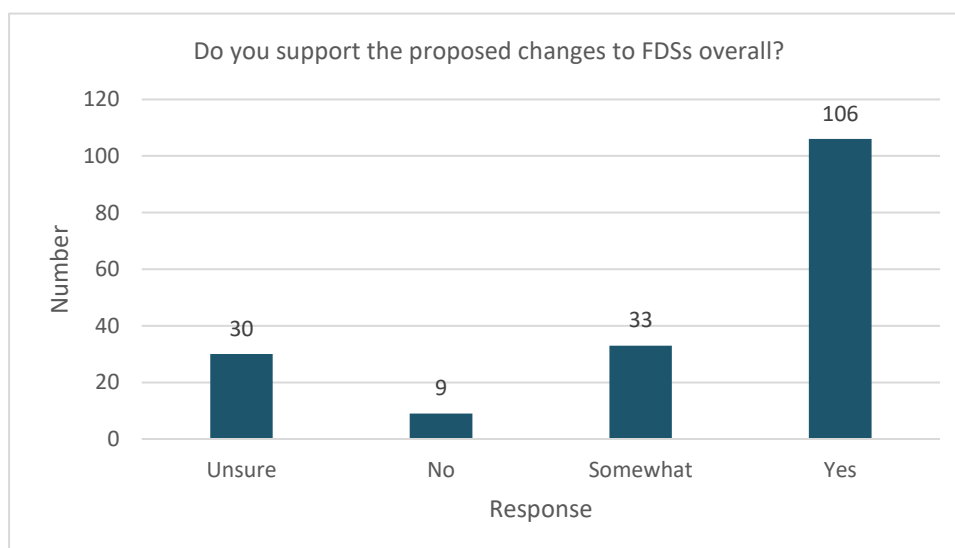
Q3: Do you support the proposed changes to Future Development Strategies (FDSs) overall?

(Q3 included other questions: [see the full text.](#))

Summary of responses

Submitters were largely supportive of the proposal. Of the 178 responses, 78 per cent either fully supported or somewhat supported it. Figure 4 shows the number of submissions by their response to the questions on FDSs.

Figure 4: Responses to questions on changes to FDSs



Support the proposal

These submitters largely supported the intent of the proposal as a tool to support best practice in strategic spatial planning.

Views on targeting the FDS policies to MUC councils were mixed. Some supported expanding the list beyond MUC councils, while others supported removing them from the 'high-growth urban area' category of the NPS-UDC. Some suggested different approaches to expanding the FDS, to include a wider range of councils.

Submitters stressed aligning the timing of an FDS to ensure integrated planning and to reduce the risk of consultation fatigue. Some also noted that the three-yearly review process is too frequent, because it is resource intensive for all parties and does not provide for certainty in planning.

"A key issue for the timing of producing FDSs is Council resourcing and alignment with implementing the other national direction instruments together with the new National

Planning Standards and the 10-year regulatory planning instrument review cycles. It is essential to ensure that the next generation of planning instruments for each Regional Council and Territorial Authority are properly coordinated and implemented as efficiently as possible to avoid out-of-sequence roll-out of the regulatory planning instruments which creates additional costs and uncertainty for both the public and private sector.”

– **Ford Land New Zealand**

Many noted that a key dependency is investing in infrastructure. They commented on the Government’s role in funding, investing in infrastructure, and aligning its infrastructure planning with FDSs. Some stressed that it will be important for an FDS to consider the effects of increased intensification.

“We are concerned that this section does not give sufficient guidance to ensure that high density growth or intensification avoids important heritage or character areas.”

– **Thorndon Society Incorporated**

Submitters also suggested a range of drafting amendments. Some stressed the need for guidance on how to enable the policies, including in the engagement process.

“Future Development Strategies are a positive first step and we support the Government’s initiative to make spatial planning a more integral part of council planning through their Comprehensive Review of the Resource Management Act. We would like to see a template approach to Future Development Strategies spatial planning; so, each council uses the same structure, language, and definitions. This is especially important when urban areas or growth corridors cross council jurisdictions.” – **Registered Master Builders Association (RMBA)**

Oppose the proposal

These submitters opposed the policy because of concerns about the standardised approach, or the compliance costs associated with the proposal.

Sector views

- **Hapū/iwi/Māori** generally supported long-term planning, identifying areas to avoid development, and supported policies on iwi/Māori involvement.
- **Local authorities** largely supported the proposal and wanted FDS timing to align with long-term planning under the Local Government Act 2002.
- **Infrastructure providers** strongly supported strategic and spatial planning as a tool to integrate land-use and infrastructure planning. Many requested that FDS policies go further to integrate infrastructure planning, such as expanding the range of infrastructure strategies and providers taken into account, or the sector’s involvement in the FDS process. Many noted concerns about reverse sensitivity effects from development on infrastructure, and requested that FDS policies direct local authorities to identify these potential conflicts.
- **Developers** were supportive overall; there were none in opposition. Submitters supported FDSs informing and integrating with other planning documents and spatial planning, and involving developers. However, they also highlighted that the FDS process must be legally contestable to ensure accountability and protect against poor decisions.

- **Academic/research communities** largely supported the proposal, but suggested that the timeframes be realistic and important. In their view, not properly planning for urban intensification can bring rapid detrimental effects. Some noted the need for the plans to consider climate change and natural hazards.
- **Crown entities** largely supported the proposal. Some suggested broadening the definition of infrastructure to include social infrastructure, such as health services. Others suggested that the policies must be responsive to Māori development.
- **Environmental NGOs/heritage/community groups** mostly did not specify their level of support, but there was a theme of support for localised approaches. These groups highlighted the need to consider biodiversity, protect productive soils, provide explicit protection for heritage and character, and avoid development in areas at risk from natural hazards or the effects of climate change. Those who opposed the policy objected to a standardised approach or felt the compliance costs would be too significant.
- **Individuals** largely supported the proposal, but there was mixed feedback on targeting. Some suggested expanding the FDS requirements to include a wider range of councils.
- **Professional bodies** wanted to extend the proposals to other urban areas. Some identified other areas that should be included to avoid development, such as heritage sites and places where reverse sensitivity may be an issue. Some noted the need for implementation guidance, and the New Zealand Planning Institute and Registered Master Builders Association suggested a national spatial plan template to create consistency. Local Government New Zealand expressed support for FDSs but also stated their belief that long-term plans under the Local Government Act 2002, district and other plans already provide a significant level of fidelity to plan for future growth and development.

Describing quality urban environments

See page 26 of the [discussion document](#).

What was proposed

The discussion document proposed giving direction on what is meant by quality urban environments, both in existing and future environments, through:

- an objective that sets out a non-exhaustive description of the features of a quality urban environment
- policies to ensure planning decisions consider whether quality urban environments are achievable
- a comprehensive description of a quality urban environment in the preamble to the NPS-UD.

The question

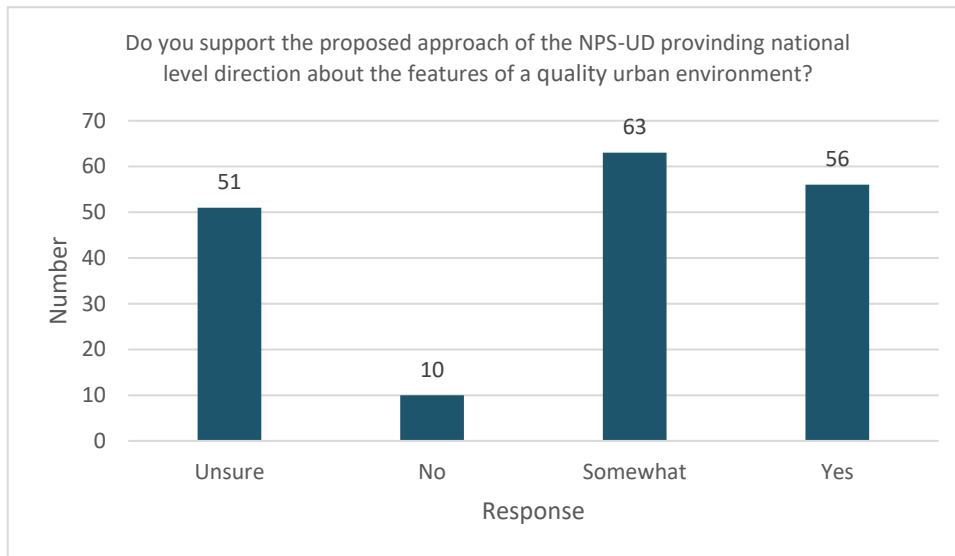
Q4: Do you support the proposed approach of the NPS-UD providing national level direction about the features of a quality urban environment?

(Q4 included other questions: [see the full text](#).)

Summary of responses

Submitters were largely supportive of the proposal. Of the 180 responses, 66 per cent either fully supported or somewhat supported it. Figure 5 shows the number of submissions by their response to the questions on the features of a quality urban environment.

Figure 5: Responses to questions on providing national level direction



Support the proposal

Most submitters suggested amendments to the description of a quality urban environment, especially to make it clearer. Some suggested including other elements of quality, such as urban design, accessibility, preservation, heritage values, the environment, climate change and various elements of wellbeing.

To ensure the definition of a ‘quality urban environment’ has legal weight, many submitters suggested including the description from the preamble as an objective and in any supporting policies.

“It is important this clarity is provided through objectives and policies, rather than preamble or supporting material. This is because it is the objectives and policies that have statutory weight.” – **Horowhenua District Council**

Some raised concerns about the efficacy of a prescriptive approach to defining quality urban environments, because the features will vary between localities.

“There does not need to be uniformity in the features of all quality urban environments, and what is a quality urban environment. There must be room for areas to decide for themselves on the development of their urban environments, in keeping with central government objectives and Policies.” – **Christchurch City Council**

Some submitters, particularly infrastructure providers, wanted the policy to recognise reverse sensitivity effects.

“[I]ntensification around infrastructure needs to be planned and implemented in a way that doesn’t constrain the operation and capacity of that infrastructure.” – **KiwiRail**

Oppose the proposal

Some were opposed because they thought local authorities were best placed to determine what a quality urban environment should be in their local context. Many of these submitters noted that taking an overly prescriptive approach could encumber quality outcomes.

Others opposed the policy because of issues with the definition. Some argued that quality cannot be adequately defined. Others commented that the current definition excludes key elements, such as references to the natural environment.

Sector views

- **Hapū/iwi/Māori** submitters noted the need for adequate consideration of those who will ultimately live, work and play in the quality urban area. Waikato-Tainui stated that the Crown should demonstrate a greater commitment to working alongside iwi as the policy develops.
- **Local authorities** were largely supportive. Most comments related to the clarity of the definition and the challenges of effectively implementing the policy. Those opposed generally cited the issue of local decision-making.

“There must be room for areas to decide for themselves on the development of their urban environments, in keeping with central government objectives and policies. The NPS-UD should reference design guidelines from local authorities and encourage the use of Urban Design Panels and Design Advisory Committees in heritage areas to assess intensification proposals.” – **Christchurch City Council**

- **Businesses/industries** were largely supportive. Some suggested other elements of quality to consider, such as health and safety.
- **Planning/urban design professionals** were concerned about the difficulty of defining quality urban environments and, in some cases, suggested references to the New Zealand Urban Design Protocol.
- **Infrastructure providers** largely supported the proposal, but raised concerns about protecting infrastructure from reverse sensitivity effects. Others wanted to include the importance of good infrastructure as an element of quality.
- **Professional bodies** were generally supportive, but raised concerns about the challenge of defining quality. Some suggested referring to the New Zealand Urban Design Protocol.

Amenity values in urban environments

See page 28 of the [discussion document](#).

What was proposed

The proposal requires planners and decision-makers to recognise that amenity values are diverse and can change over time. The intent is to provide for the wellbeing of people and communities by:

- encouraging the creation of quality urban environments that provide for the diverse and changing amenity values of current and future residents

- allowing urban environments to change by reducing the bias towards existing property owners
- supporting a wider/holistic interpretation of section 7(c) of the RMA
- ensuring decision-makers recognise that amenity values are not static, but dynamic and evolving
- recognising that urban development can have a positive impact on amenity values.

The question

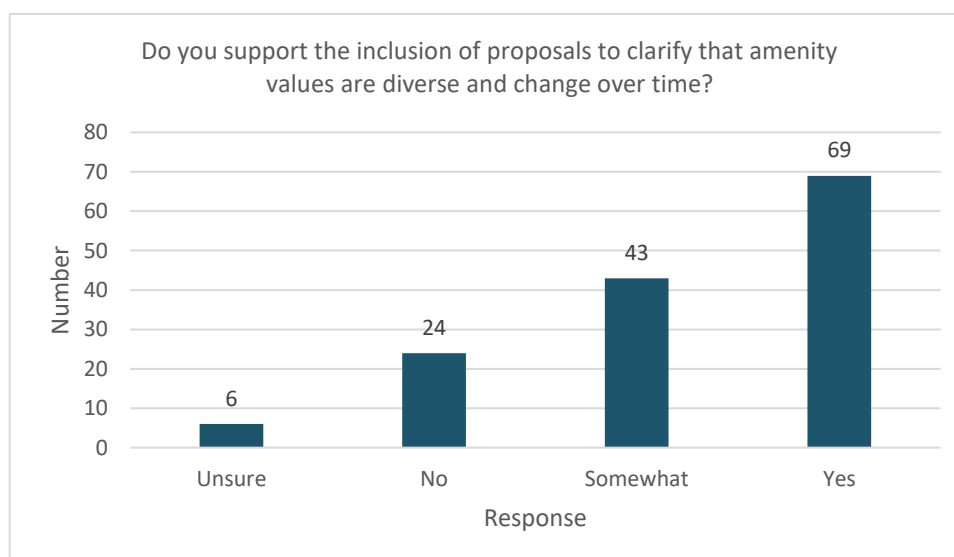
Q5: Do you support the inclusion of proposals to clarify that amenity values are diverse and change over time?

(Q5 included other questions: [see the full text.](#))

Summary of responses

Submitters were largely supportive of the proposal. Of the 142 responses, 79 per cent either fully supported or somewhat supported it. Figure 6 shows the number of submissions by their response to the questions on amenity values.

Figure 6: Responses to questions on amenity values



Support the proposal

Submitters largely agreed that decisions on amenity value should consider amenity for the wider community and for future citizens.

“A growing body of research indicates that people pay more to have access to urban amenities. For example, houses close to parks are generally more valuable. Parks, schools, small retail, and transit are some of the amenities that make for a rich urban experience.”

– **Waikato District Health Board**

Many were interested in how this would work in practice, and sought further guidance on how to implement the proposal. Some requested a more detailed definition of urban amenity

values, while others raised concerns that the proposal might conflict with the statutory approach to amenity under the RMA.

Many submitters stressed the importance of considering all elements of amenity value, particularly existing environmental and heritage values, as well as the potential impacts of amenity decisions on affected parties.

Oppose the proposal

Some submitters opposed the proposal because of their concern that it would be used to justify urban development at the expense of environmental, cultural and heritage values, and the rights of private landowners to enjoy their properties. Queenstown Lakes District Council noted the importance of natural and heritage amenity to support their tourism industry.

Others cited the risk in attempting to adopt a nationally consistent approach to an inherently subjective and highly localised issue.

Sector views

- **Hapū/iwi/Māori** noted that while wāhi tapu and cultural sites of significance may contribute to amenity values, they are not subject to change and should be differentiated with stronger protection mechanisms.
- **Local authorities** were generally supportive of the intent of the proposal. Some were of the opinion that the wider community and future residents were already a consideration in decision-making on amenity. Some councils questioned whether the proposed wording was strong enough to achieve the intent and suggested a more prescriptive, detailed approach.
- **Infrastructure providers** sought the inclusion of infrastructure such as electricity and gas in any definition of 'urban amenity'. These submitters suggested that utilities contribute to the use and enjoyment of urban environments. They also sought a broader definition of amenity to allow for any technological changes or advancements.

Enabling opportunities for development

See page 30 of the [discussion document](#).

What was proposed

The discussion document included proposals to ensure council plans always enable at least enough development capacity to meet a diverse range of demands for housing and business land by:

- providing development capacity that goes beyond 'sufficient' to 'at least enough' at 'all times' for a range of demands
- accounting for development capacity that is likely to be taken up
- informing the Minister for the Environment if councils cannot provide enough development capacity
- requiring MUCs to set minimum bottom lines rather than 'targets' for medium- and long-term development capacity in the FDSs, council plans and policy statements.

The question

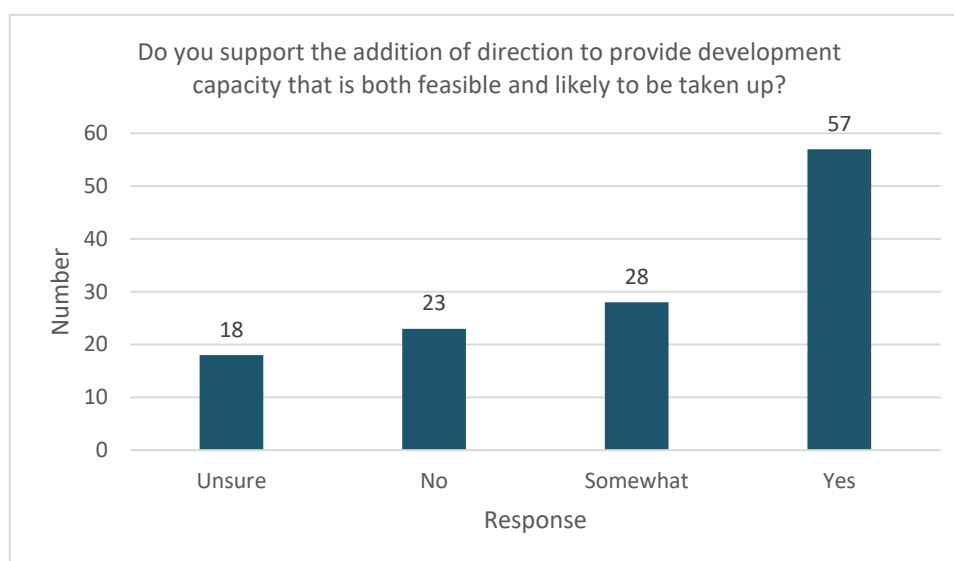
Q6: Do you support the addition of direction to provide development capacity that is both feasible and likely to be taken up?

(Q6 included other questions: [see the full text.](#))

Summary of responses

Submitters were largely supportive of the proposal. Of the 126 responses, 67 per cent either fully supported or somewhat supported it. Figure 7 shows the number of submissions by their response to the questions on enabling opportunities for development.

Figure 7: Responses to questions on enabling opportunities for development



Support the proposal

Most of these submitters noted that the proposals would help to ensure development reflects demand and supports infrastructure planning.

Many submitters, mainly local government, raised concerns about the requirement to predict 'development likely to be taken up'. They noted the challenges with using historic data to predict future demand, and how, in many cases, this would effectively be a judgement decision.

Submitters stressed the importance of guidance. Several noted that councils have little ability to influence take-up through an RMA process.

Several suggested amendments to improve the clarity of the proposals.

Sector views

- **Local authorities** had mixed support for the proposal. Some had concerns about the compliance costs. Two medium-growth councils indicated their preference for compulsory compliance with the provisions (rather than compliance being optional for non-MUC councils).

- **Individuals** were largely supportive of the proposal as a tool to help allow for more controlled development of urban areas. Some indicated that the market is the best determiner of where development should occur. Others noted that development should only occur in existing urban areas, not in greenfield developments.
- **Planning/urban design professionals** generally supported the proposal. Some noted that the policy should explicitly target development in urban areas, not greenfield development.

Ensuring plans provide for expected levels of development

See page 33 of the [discussion document](#).

What was proposed

The proposal would require district plans in MUCs to include descriptions of the expected types and nature of development in each zone. It would also direct authorities to:

- ensure the objectives, policies, rules and assessment criteria in district plans are consistent with the expected level of development
- be clear about the impact of the proposed objectives, policies, rules and assessment criteria on development capacity, and ensure consistency with the expected level of development in the FDS
- respond through plan changes and other methods when evidence suggests that development will not achieve the outcomes in the zone descriptions
- show how evidence has been considered in decision-making.

The question

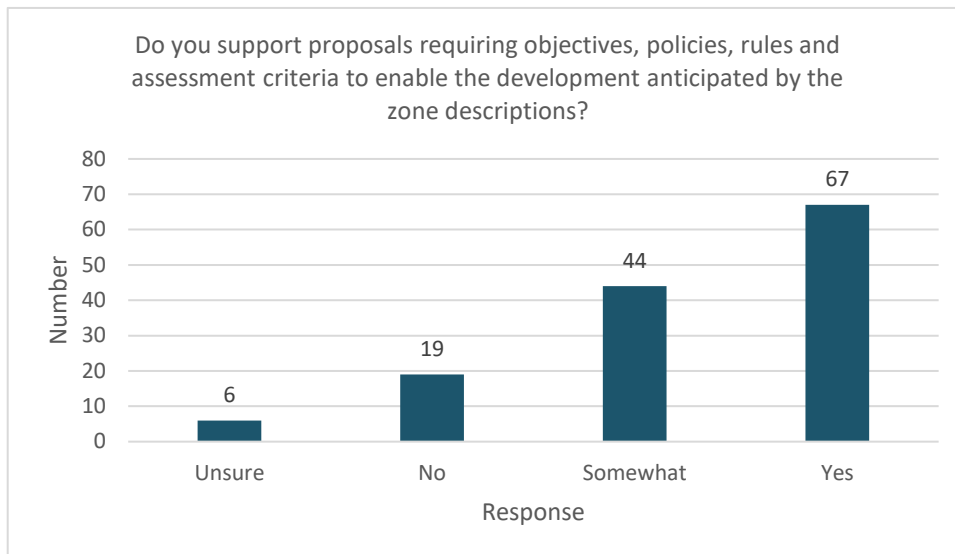
Q7: Do you support proposals requiring objectives, policies, rules, and assessment criteria to enable the development anticipated by the zone description?

(Q7 included other questions: [see the full text](#).)

Summary of responses

Submitters were largely supportive of the proposal. Of the 137 responses, 81 per cent either fully supported or somewhat supported it. Figure 8 shows the number of submissions by their response to the questions on enabling expected levels of development.

Figure 8: Responses to questions on ensuring plan content provides for expected levels of development



Support the proposal

Most submitters were largely supportive because the policy would give more certainty to councils, residents and developers. Some sought more detail for zone descriptions and the assurance of protections for amenity values.

As with other proposals, submitters sought more clarity, requested the NPS-UD to take into account reverse sensitivity, and suggested longer implementation timeframes.

Oppose the proposal

Those opposed suggested the policy would be redundant because most MUCs already have similar policies in their district plans. Others stated that it would limit councils in their need for flexibility and innovation.

Sector views

- **Local authorities** were largely supportive of the proposal but sought clarity for the policies. In some cases, submitters suggested rewording. Many were opposed to a prescriptive approach. Some had concerns about the resourcing impact of implementing the policies.
- **Infrastructure providers** were supportive and noted that considering anticipated levels of development might encourage intensification.
- **Developers** were largely supportive and noted that the proposal would provide more certainty.
- **Planning/urban design professionals** were largely supportive, and some noted that intensification should be encouraged and flexibility considered.
- **Professional bodies** were largely supportive, but some suggested clarity for the policies.
- **Environmental NGOs/heritage/community groups** were largely supportive, but some stressed the importance of considering amenity values in zone descriptions.

Providing for intensification

See page 35 of the [discussion document](#).

What was proposed

The NPS-UD proposes several policies and policy options that direct councils to enable intensification in urban areas where benefits are best realised.

The question

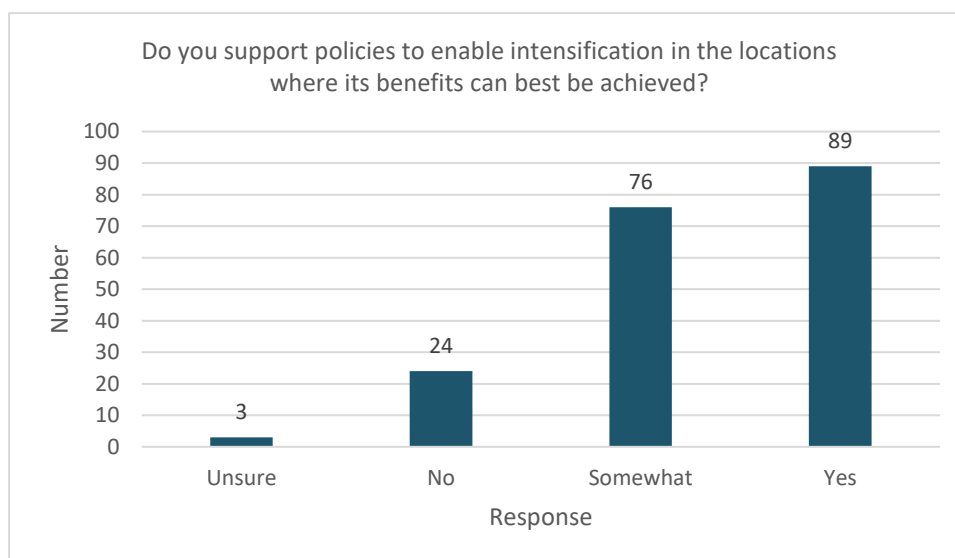
Q8: Do you support policies to enable intensification in the locations where its benefits can best be achieved?

(Q8 included other questions: [see the full text](#).)

Summary of responses

Submitters were largely supportive of the proposal. Of the 192 responses, 86 per cent either fully supported or somewhat supported it. Figure 9 shows the number of submissions by their response to the questions on enabling intensification.

Figure 9: Responses to questions on enabling intensification



Support the proposal

Submitters largely supported policies that will enable intensification of city areas close to transport links, employment and retail because it helps prevent sprawl, improves affordability and reflects best practice for planning.

Views on the proposed prescriptive or descriptive approaches (see page 37 of the [discussion document](#)) for directing intensification were mixed, with slightly more support overall for the descriptive approach.

The prescriptive approach was cited as a good option for dictating to councils that they must densify regardless of heritage and character issues, but this was also a key reason for opposing it.

Local authorities mainly supported the descriptive approach, because it would allow decisions to reflect the unique local challenges.

Some supported the proposal but wanted assurance that decisions on intensification would fully consider the impacts on wellbeing, housing choice, urban design, character and heritage values.

Some submitters said the policy needed to account for locations that are unsuitable for intensification, such as areas with poor public transport or inadequate infrastructure. Submitters also suggested other measures for density, such as minimum floor area or people per hectare.

Some commented that the timeframes for councils to prepare plan changes to give effect to the intensification provisions were too short.

“Council supports the intent of the intensification provisions, however would prefer a longer timeframe than 18 months to notify plan changes to give effect to the NPS-UD.”
– **Greater Wellington Regional Council**

Oppose the proposal

Some who opposed the policy were concerned that a standard policy would not work for all cities. Several were also opposed because of perceived negative impacts of intensification, such as pressure on natural resources and infrastructure, poor urban design, and erosion of property rights. Some considered other tools better suited to inform decisions on intensification, such as the FDS, so this policy would be redundant.

Sector views

- **Hapū/iwi/Māori** supported the proposal, but only if its effects would be regulated to ensure that development is sustainable. They also stressed the importance of recognising amenity values and heritage.
- **Local authorities** largely supported the policy, but sought clarification of terms such as ‘centres’, ‘frequent public transport’, ‘density’ and ‘proximity’. Submitters preferred the descriptive approach.
- **Businesses/industries** wanted assurance that intensification would not hinder the supply and maintenance of infrastructure services, such as gas and electricity.
- **Planning/urban design professionals** – Some noted the need for intensification policies that remove any disincentives to convert land area to floor space.
- **Professional bodies** – Some noted that the best place to make decisions is at the local level. Some were concerned that housing choice would not be possible if intensification is the default option.
- **Individuals** raised concerns about lack of open spaces, loss of amenity, and poor design. Some were concerned that standardised policies will not work in all cities. Many supported intensification as an alternative to urban sprawl.

- **Environmental NGOs/heritage/community groups** supported enabling intensification where there are the most benefits. Some did not consider 60 dwellings per hectare ideal for all urban areas.

Providing for further greenfield development

See page 38 of the [discussion document](#).

What was proposed

The discussion document proposed expanding on the NPS-UDC by directing local authorities within MUCs to consider plan change requests for urban development that are a) out-of-sequence or b) unidentified in plans.

The question

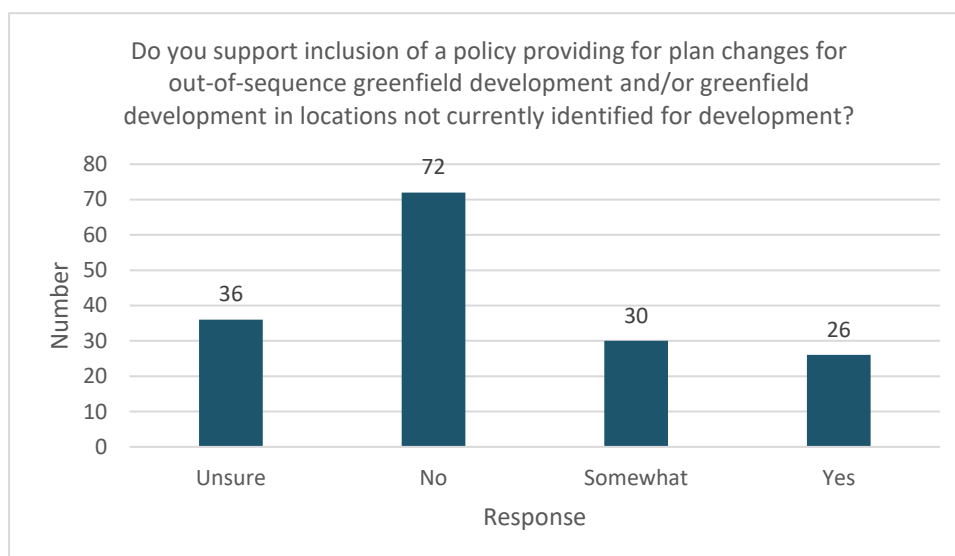
Q9: Do you support inclusion of a policy providing for plan changes for out-of-sequence greenfield development and/or greenfield development in locations not currently identified for development?

(Q9 included other questions: [see full text](#).)

Summary of responses

Submitters were largely unsupportive of the proposal. Of the 164 responses, 44 per cent were opposed, and only 34 per cent either fully supported or somewhat supported it. Figure 10 shows the number of submissions by their response to the questions on greenfield development.

Figure 10: Responses to questions on greenfield development



Support the proposal

Those in support were largely developers. They considered the current tools for non-statutory staging plans too inflexible and called for a mechanism to provide for appropriate out-of-sequence development. Of those who expressed conditional support, many noted that greenfield development should be 'strategic' or otherwise align with an FDS.

Oppose the proposal

A large number opposed the proposal because of concerns that it would unintentionally undermine the intent of the rest of the NPS-UD, especially the FDS and the proposals for improved, evidence-based decision-making.

"We believe there is a tension in the NPS-UD between the emphasis on good strategic, integrated planning, which we support, and this proposed policy."

– **Environment Canterbury**

Various submitters stated that prioritising ad hoc greenfield growth would undermine planned intensification policies within existing urban limits, such as by causing market uncertainty and diverting infrastructure funding from planned growth areas.

"Council is concerned that an NPS level of greenfield policy, may have the effect of redirecting resources in an ad-hoc way and will undermine a robust and comprehensive approach to future urban growth. Good planning followed by committed infrastructure investment over time allows the development of an infrastructure investment pipeline that gives certainty to the development market". – **Auckland Council**

Several submitters considered the greenfields policy inconsistent with the proposed National Policy Statement for Highly Productive Land. A number noted that intensification in brownfield should be prioritised.

Some considered the policy unnecessary because the RMA plan change process is already a mechanism for unanticipated or out-of-sequence growth.

"This should not be necessary. If development stacks up favourably, there should not need to be a reliance on an NPS to promote a plan change. The same rationale would apply to private plan changes, where such an approach is more likely to be utilised".

– **Palmerston North City Council**

Many stated that the wording of the example policy is too directive and would undermine the statutory tests for plan changes under the RMA. Some noted that better limits would be needed to ensure high-quality development.

"In principle we could support this, however, there needs to be a high bar for this type of development to occur. As mentioned above, priority should be given to intensification and brownfield redevelopment. It should not be an easy process to bypass more sustainable development types in order to develop greenfield sites". – **Solari Architects Ltd**

Sector views

- **Hapū/iwi/Māori** – Te Atiawa Manawhenua Ki Te Tau Ihu Trust supported the proposal on the condition that there would be infrastructure to support development. They also requested consideration for the impact of development on highly productive soils and sites of significance to Māori.

- **Local authorities** were largely represented by the issues discussed above. Many local authorities raised concerns over how to pay for the full capital and operational costs of infrastructure for out-of-sequence or unanticipated developments. Councils noted it might be difficult for developers to pay for the full cost of infrastructure. Submitters also noted the resourcing pressure on local authorities to respond to ad hoc requests from the developers.
- **Individuals** were concerned about urban sprawl, transport emissions, traffic congestion and the high cost of transport infrastructure to support greenfield development.
- **Developers** noted that non-statutory staging plans can be too inflexible and sought a mechanism for appropriate out-of-sequence development.
- **Infrastructure providers** sought provision to manage reverse sensitivity.
- **Agricultural sector** submitters expressed concerns that allowing ad hoc development would make reverse sensitivity difficult to manage.

Removing minimum car parking requirements

See page 40 of the [discussion document](#).

What was proposed

The consultation document proposed three policy options that would limit the ability of local authorities in major urban areas to regulate the number of car parks required for development.

Policy options

1. Minimum and maximum standards in all zones.
2. Minimum standards in all zones.
3. Minimum standards in medium and high-density zones.

The question

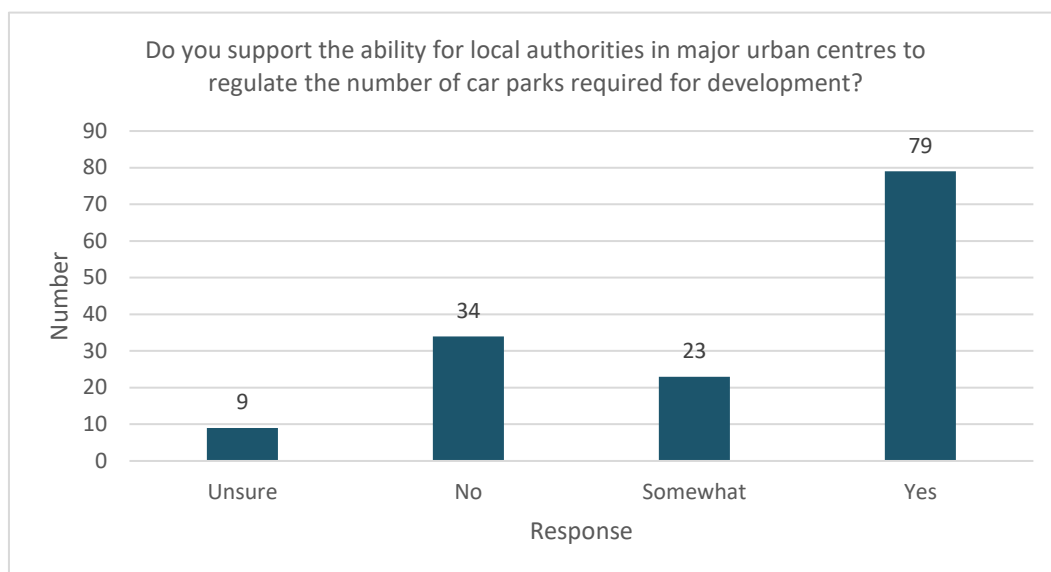
Q10: Do you support limiting the ability for local authorities in major urban centres to regulate the number of car parks required for development?

(Q10 included other questions: [see the full text](#).)

Summary of responses

Submitters were largely supportive of the proposal. Of the 145 responses, 70 per cent either fully supported or somewhat supported it. Figure 11 shows the number of submissions by their response to the questions on car parking.

Figure 11: Responses to questions on car parking



Support the proposal

Submitters largely supported removing minimum parking requirements, to encourage a shift towards other modes of transport, and contribute to better environmental outcomes. Some noted that the policy could go further by imposing parking maximums and requiring district plans to have policies for managing parking areas.

Submitters noted that success would depend on investment in supporting activities, such as alternatives to private cars, adequate public transport, quality transit networks, better planning for parking areas, and guidance on the available transport management tools.

Most supported either removing minimum standards in all zones (option 2) or removing minimum standards in medium- and high-density zones (option 3), because these maintain some capacity to manage parking supply.

Removing minimum and maximum standards in all zones (option 1) was considered too restrictive, because it would mean that the oversupply of car parks could not be regulated, particularly where it would conflict with objectives for more intensive densities and public transport objectives. There was general concern about the increased pressure for on-street parking, and worries that the costs of providing parking would be transferred from developers to ratepayers.

In terms of timing, some submitters commented that the policy should take immediate effect, and that there would be limited benefit from an 18-month lead-in.

Oppose the proposal

The main reason that submitters did not support the proposal was because they noted it might cause parking overspill, which would result in increased costs of managing car park use. Some questioned whether parking was a significant cost compared to the costs associated with other rules typically found in district plans. A small number were concerned that the policy might disproportionately affect low-wage households, where parking costs would increase as supply decreases. There were concerns that there are limited alternatives to car use in many locations.

Sector views

- **Hapū/iwi/Māori** – Ngā Maunga Whakahii o Kaipara was concerned that the proposal would result in parking overspill into public open spaces. Waikato-Tainui suggested that market-led solutions would be best suited to reduce oversupply.
- **Local authorities** largely supported option 2 or 3, with most support for option 3. There was no support for option 1 as it removes the ability to manage oversupply.
- **Individuals** strongly supported the policy, but many stressed that the proposal must be accompanied by on-street parking management policies that are included in a district plan and are enforceable.
- **Businesses/industry** submitters from large format retail opposed the proposal because it would increase the costs associated with managing their car parking use, particularly from non-customers.
- **Developers** were concerned that councils would require wider road design to accommodate more on-street parking.

“If parking on-site is reduced, then Councils will insist on standard road widths which will cost developers more in lost land than providing carparks on-site.” – **Western Bay of Plenty District Council**

More directive intervention to enable quality urban development

See page 42 of the [discussion document](#).

What was proposed

The proposal sought views from the public on whether there should be more directive intervention from the government on certain rules or district plans. The discussion document also sought views on which rules and tools need attention to remove constraints on development in local authority plans.

The question

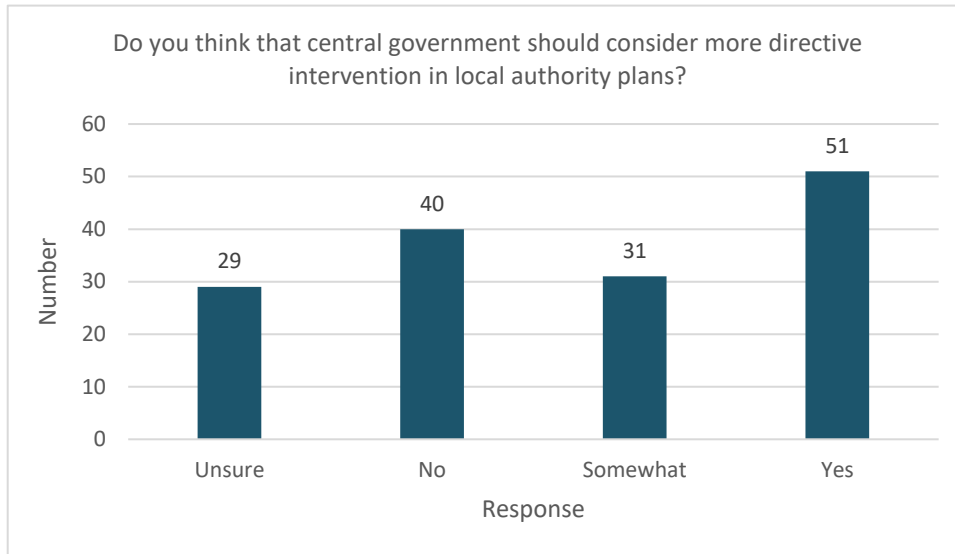
Q11: Do you think that central government should consider more directive intervention in local authority plans?

(Q11 includes other questions: [see the full text](#).)

Summary of responses

Submitters were largely mixed in their views on this proposal. Of the 151 responses, 54 per cent either fully supported or somewhat supported it. Figure 12 shows the number of submissions by their response to the questions on directive intervention in local authority plans.

Figure 12: Responses to questions about more direct intervention in local authority plans



Some submitters were against more interventions. Others offered conditional or tentative support for various options.

Those who supported some form of further intervention identified options, ranging from guidance to removing rules or enabling/requiring minimum development.

Submitters in favour of intervention overall were more supportive of options that regulated certain activities or the use of guidance, such as requiring national consistency, bottom lines or non-statutory guidance.

Sector views

- **Local authorities** were generally against removing rules but supported some form of further regulation and guidance.
- **Developers** broadly supported the proposal but had different views on what intervention should look like.
- **Professional bodies** had mixed views. There was largely support for national guidance, but concern about regulations and implementation. The main reason cited was that standardised policies are unlikely to work in practice.
- **Planning/urban design professionals** were largely supportive of some sort of intervention, particularly for national consistency.
- **Individuals** largely supported the proposal, but where there was opposition, it was largely Christchurch-based and on the grounds of loss of sunlight or increased density.
- **Environmental NGOs/heritage/community groups** largely opposed further intervention. Most were residents' associations in Wellington and Christchurch.

Using market information to make decisions

See page 46 of the [discussion document](#).

What was proposed

This proposal would require all local authorities to use evidence and information about their land and development markets in their planning decisions. MUCs would be required to analyse price efficiency indicators, and all local authorities would be required to:

- monitor indicators of housing affordability, residential building consents versus household growth, residential prices and rents, and housing price-cost ratios
- reflect information about land and development markets in section 32 reports
- assess demand for housing and business land, and how much development capacity their plans need to provide to meet demand in the short, medium and long term.

The question

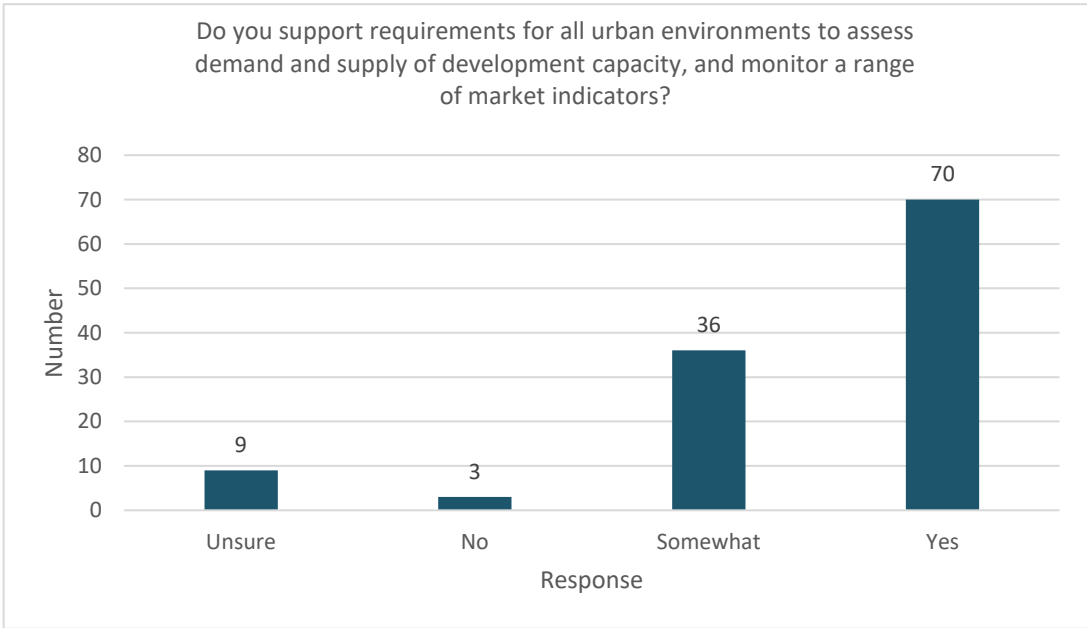
Q12: Do you support requirements for all urban environments to assess demand and supply of development capacity, and monitor a range of market indicators?

(Q12 includes other questions: [see full text](#).)

Summary of responses

Submitters were largely supportive of the proposal. Of the 118 responses, 90 per cent either fully supported or somewhat supported it. Figure 13 shows the number of submissions by their response to the questions on local authorities using market information.

Figure 13: Responses to questions on local authorities using market information



Support the proposal

Most submitters largely supported the proposal because they noted that robust and up-to-date information would support more effective engagement with stakeholders and planning decisions.

Several recommended including a wide range of measures such as social housing, population growth, housing types, wellbeing and environmental impacts. The policy could also include aspects such as supporting infrastructure, especially services provided by central government such as schools and medical services.

Some submitters commented on the appropriateness of some proposed measures to help understand the impact of the market, and how it interplays with planning.

Some noted that quarterly monitoring might be too onerous for some local authorities, and suggested bi-annual or annual monitoring.

Sector views

- **Local authorities** largely supported the proposal. Many noted that monitoring should include a wider range of measures such as a social housing register, migrations, population growth and structure, housing types and infrastructure development, sustainability, wellbeing and environmental impact. Some submitters stated that reducing minimum floor space requirements could lead to adverse health effects from household crowding.
- **Individuals** largely supported the proposal. The most frequent comment was that the indicators should include wider socio-economic factors and effects.

Preparing a Housing and Business Development Capacity Assessment (HBA)

See page 48 and appendix 3 of the [discussion document](#).

What was proposed

The proposals would build on and replace the existing NPS-UDC requirements, including:

- only local authorities in major urban centres would need to prepare a full HBA
- update HBAs in time to inform Future Development Strategies, long-term plans, and infrastructure strategies prepared under the Local Government Act 2002
- include scenarios for demand for housing and business land, and compare these with capacity
- clarify what to include in estimates for development capacity that is feasible and likely to be taken up in the short, medium and long term
- use price efficiency indicators to analyse how plans may affect the overall supply and prices of dwellings
- use a slightly different approach to assessing whether there is enough development capacity for dwellings by type, location and price point
- clarify the requirements to assess business land.

The question

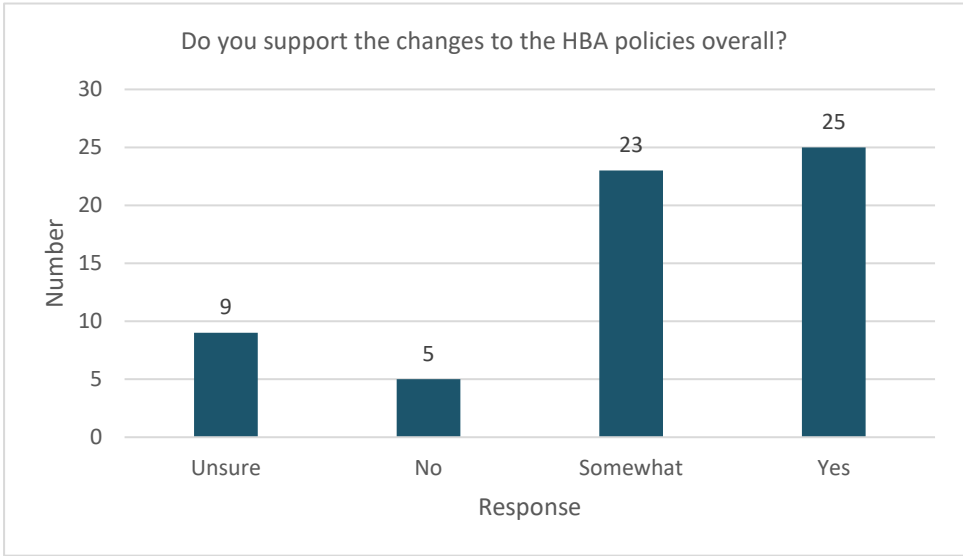
QA1 (appendix 3): Do you support the changes to the HBA policies overall?

(QA1 includes other questions: [see full text.](#))

Summary of responses

Submitters were largely supportive of the proposal. Of the 62 responses, 77 per cent either fully supported or somewhat supported it. Figure 14 shows the number of submissions by the nature of their response to the questions on the HBA policies.

Figure 14: Responses to questions about changes to the HBA policies



Support the proposal

Some submitters noted that applying some of the measures would be a challenge because of the likely effectiveness of the measure or the availability of data.

Several submitters, mainly local governments, had concerns that price efficiency indicators would not be well understood.

Some suggested there was a lack of availability of relevant information and data, such as tenure information and data to assess business land.

With respect to modelling long-term feasibility, some noted the difficulty of forecasting over the medium and long term for commercial capacity. Some suggested alternative measurement methods for the various policies.

There were mixed responses on the policy-setting development margins. Some noted that it was unclear how these margins were chosen. In some cases, submitters considered them too low, noting that there are many reasons why take-up may not occur.

Submitters commented on the merits of targeting the policies to both MUCs and non-MUCs, suggesting pros and cons for including and excluding some urban areas. Those in support commented that HBAs are an important planning tool to inform compliance with other NPS-UD policies, while others noted that the process might be too resource-intensive.

Submitters strongly suggested requiring further guidance on the HBA changes, such as how to decide appropriate scenarios for the scenario analysis requirement.

Submitters supported updating HBAs in time to inform FDSs and long-term plans. Some noted that if the 2018 census is to be used, HBAs should be completed no sooner than December 2021. Several considered the three-year requirement to publish the HBA too short, noting that it would not allow councils to understand the impacts of policies before they would have to be reviewed.

Sector views

- **Local authorities** were concerned with the requirement to use the private efficiency indicator to assess feasibility and take-up, noting that it would be particularly theoretical and technical. Submitters supported the proposal being less prescriptive and allowing greater flexibility for preparing HBAs. They also supported the proposal for scenario testing, including different spatial scenarios and growth rates, but asked for supporting guidance.
- **Planning/urban design professionals** largely supported the proposal but considered the margins too low.
- **Individuals** largely supported the proposals. Common themes included extending the requirement beyond MUCs, and concerns for loss of natural environment.

Taking into account issues of concern to iwi and hapū

See page 49 of the [discussion document](#).

What was proposed

The proposal aims to ensure that urban development considers the interests of iwi and hapū by requiring all local authorities to:

- provide iwi and hapū with opportunities to identify urban resource management issues of concern to them relating to urban environments
- indicate how those issues have been or will be addressed in the proposed policy statement, plan or strategy.

The question

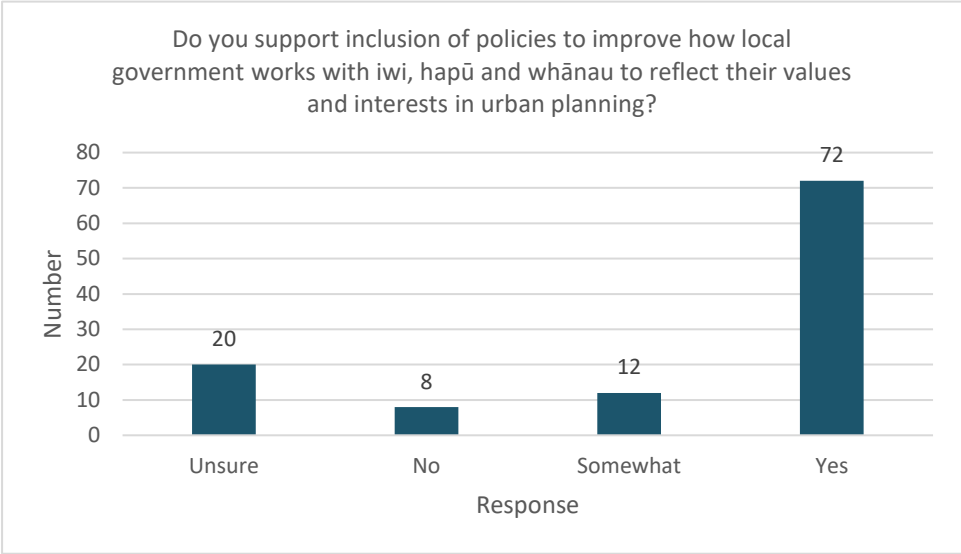
Q13: Do you support inclusion of policies to improve how local government works with iwi, hapū and whānau to reflect their values and interests in urban planning?

(Q13 includes other questions: [see the full text](#).)

Summary of responses

Submitters were largely supportive of the proposal. Of the 112 responses, 75 per cent either fully supported or somewhat supported it. Figure 15 shows the number of submissions by their response to the questions on engagement with iwi, hapū and whānau.

Figure 15: Responses to questions on engagement with iwi, hapū and whānau



Support for proposal

Submitters largely agreed that reflecting te ao Māori (the Māori world view) in policy and planning decisions represents best practice and is necessary to ensure Treaty of Waitangi (te Tiriti o Waitangi) obligations are met.

“Mana whenua participation and the integration of mātauranga Māori and tikanga in strategic land use planning and resource management decision-making and practice are of paramount importance to ensure a sustainable future for iwi, hapū and whānau and for Aotearoa as a whole.” – **Auckland Council**

A key issue was the requirement to provide adequate support and resourcing for Māori communities and local authorities to participate meaningfully in urban planning. If the support is not provided, submitters suggested that the engagement processes might affect the timely delivery of development projects.

“We ... are concerned about the time and expense this could add to processes as well as people’s capacity to respond.” – **Hawke’s Bay Regional, Hastings District, Napier City, and Central Hawke’s Bay District Councils**

Unclear position for proposal

The main concern for those with an unclear position was the capacity of affected parties to engage in urban planning. Some said the proposal restated the RMA, so it would add little value and would not be required.

Sector views

- **Hapū/iwi/Māori** supported increased iwi and hapū involvement, but noted that the roles of different groups (for example, urban Māori authorities, iwi, hapū, post-settlement governance entities) should be considered. They also noted that existing tools such as Mana Whakahono a Rohe could provide a framework for engagement.

“If we wish to create a sense of identity, support history and foster language, place making is a good place to start.” – **Ngā Maunga Whakahii o Kaipara**

- **Local authorities** largely supported the proposal, noting that it provides for a more comprehensive conversation on Māori aspirations. The main issues included the challenges of implementing the proposals within the timeframes. Submitters recommended further guidance and other support to show how to undertake consultation over and above standard processes.
- **Businesses/industries** – Submitters were largely supportive of proposals. Some considered engagement should occur at the plan-making stage to allow others’ interests, and to ensure the process does not unnecessarily slow down a development project.
- **Planning/urban design professionals** generally supported the policy, but noted that Māori communities will need to be adequately resourced to participate. Some also commented that incorporating tangata whenua values into urban design guidance could help support better practice.
- **Professional bodies** expressed support for the policy. Some noted concerns about additional costs on top of existing consultation processes, and the capacity of affected parties for meaningful engagement.
- **Environmental NGOs/heritage/community groups** supported the proposal, noting that urban planning must incorporate indigenous knowledge and prioritise Māori values. The Mount Victoria Residents’ Association considered the current engagement process inadequate for all groups, not just Māori.

Coordinated planning

See page 52 of the [discussion document](#).

What was proposed

The discussion document proposed expanding on the existing provisions in the NPS-UDC on coordinated and aligned planning decisions within and across local authority boundaries to:

- make it more explicit that planning decisions should be coordinated and aligned with infrastructure decisions
- encourage local authorities to cooperate on principles for partnering with iwi and hapū.

The question

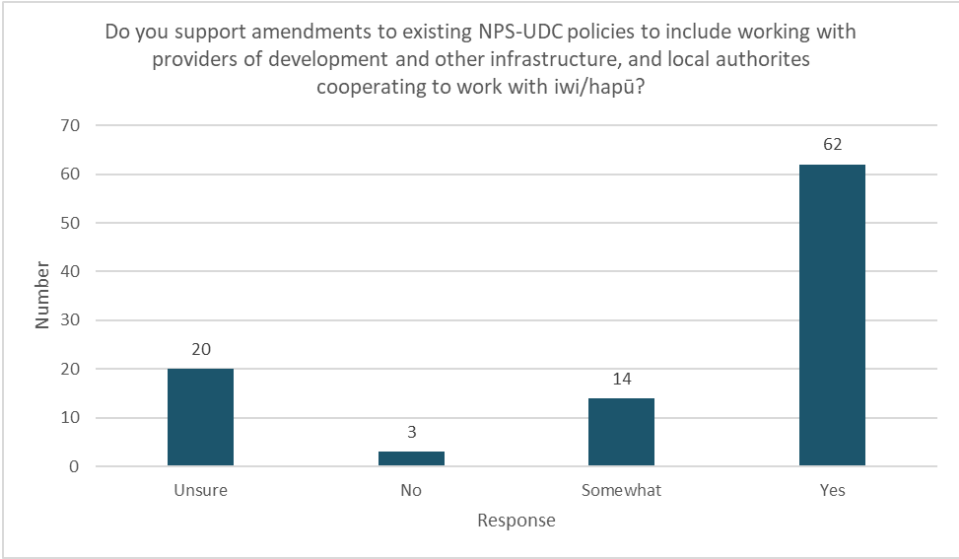
Q14: Do you support amendments to existing NPS-UDC 2016 policies to include working with providers of development and other infrastructure, and local authorities cooperating to work with iwi/hapū?

(Q14 includes other questions: [see the full text](#).)

Summary of responses

Submitters were largely supportive of the proposal. Of the 99 responses, 77 per cent either fully supported or somewhat supported it. Figure 16 shows the number of submissions by their response to the questions on working with iwi and hapū, and infrastructure providers.

Figure 16: Responses to questions on working with iwi, hapū and infrastructure providers



Support for proposal

Submitters were largely supportive of early engagement. Some suggested clarifying the definition of ‘other infrastructure’ to ensure that local authorities would work with providers of existing critical and energy infrastructure, the health sector and airports.

“The Council would like to build stronger relations with central government as part of a ‘whole of government approach’ to dealing with urban problems, particularly at a community level.” – **Christchurch City Council**

Some noted that the proposal should be clearer about whether all neighbouring councils need to be engaged when preparing HBAs and FDSs.

“[T]he issues facing these councils, while important, are different and not high growth orientated. Accordingly, greater clarity is required in O10, that growth decisions need not be coordinated with other nearby councils.” – **SmartGrowth**

Submitters noted the importance of engaging early with infrastructure providers.

“[W]e strongly encourage early engagement and discussion with infrastructure providers when local authorities and developers are making their strategic development plans.” – **Electricity Networks Association (ENA)**

Unclear position for proposal

Some submitters sought better coordination with central government.

Some noted that the proposal will require time and resources. In some cases, it will be necessary to equip affected parties, such as iwi and hapū, with the resources to contribute meaningfully to the process.

Some submitters noted that developers need to develop their own ability to implement through mātauranga Māori frameworks.

A number commented that the policy might be difficult to implement because private sector commercial sensitivities would prevent information sharing.

Sector views

- **Hapū/iwi/Māori** – the two submitters on this topic supported the proposal.
- **Local authorities** largely supported the proposal and highlighted the importance of early engagement. However, they wanted clarification about which neighbouring councils they would need to engage.
- **Businesses/industries** supported the proposal and noted that current arrangements do not support the requirement for integrated land use and infrastructure planning. Many noted the need to protect against the reverse sensitivity risks of increased development.
- **Infrastructure providers** were unsure about the proposals. Some noted that the provisions should explicitly require coordination with the providers of certain forms of infrastructure.
- **Individuals** were largely supportive of the proposals.
- **Planning/urban design professionals** largely supported the proposal. Some noted the resource implications of more engagement, and the need to coordinate decisions across urban boundaries. Some suggested amendments to the definition of ‘other infrastructure’.

Alignment with other national direction

See page 57 of the [discussion document](#).

Alignment with other national direction

Many submitters wanted the NPS-UD to be clearer about how it aligned with other national direction. There was particular concern that the policy could undermine the intent of the proposed:

- National Policy Statement for Highly Productive Land (NPS-HPL)
- National Policy Statement for Indigenous Biodiversity (NPS-IB)
- national direction and regulations for freshwater management.

The main reason was the potential ramifications of legal action to push for development, despite degrading highly productive land, indigenous biodiversity and freshwater.

There were also concerns about interaction with other national direction:

- National Environmental Standards for Air Quality
- New Zealand Coastal Policy Statement
- national planning standards.

To manage interactions between national direction instruments, submitters wanted all other relevant national direction to be included in FDSs.

Interactions with NPS on highly productive land

A total of 84 submitters commented on the NPS-HPL. Many raised concerns about the interaction between the NPS-HPL and NPS-UD at a high level. Others specified their areas of concern.

Key themes

- Some urban areas are surrounded by land with a Land Use Capability (LUC) classification of 1-3, and the NPS-HPL will constrain future greenfield development. For example, the Horowhenua District Council commented that the NPS-HPL would constrain urban development in Levin because an area proposed for development is has an LUC classification of 3.
- There are no direct references to protecting highly productive land in the FDS requirements. Including this land in an FDS would provide greater protection.
- Out-of-sequence greenfield development will need to consider highly productive land to ensure its protection.

Interactions with national direction on freshwater management

A total of 50 submitters commented on the proposed national direction on freshwater. Many raised concerns about the interaction between this and the NPS-UD at a high level. Others specified areas of concern.

Key themes

- The NPS-UD does not protect water enough. Reasons included preserving New Zealand's 'pure, clean, green' image, and genuine concern about future availability of drinking water.
- Urban development will continue to degrade water quality unless there is strong protection of freshwater.
- Freshwater management should be included in FDSs.
- Water sensitive urban design should be a feature of any new development that may affect freshwater, to ensure minimal damage.
- A few submitters raised questions about the negative implications of the greenfields policy on freshwater management.

Interactions with NPS on indigenous biodiversity

A total of 45 submitters commented on the NPS-IB. Many raised concerns about the interaction between this and the NPS-UD at a high level. Others specified areas of concern.

Key themes

- As part of a concern about preservation, some wanted to shift the policies of the NPS-UD towards intensification rather than outward expansion. Their reason was that greenfield expansion would lead to a loss of biodiversity.

- Include aspects of the NPS-IB in the NPS-UD. Options include considering IB in amenity values or including it in FDSs.
- Some mentioned the NPS-IB constraining urban development, but there was more of a focus on balancing the two policies.

Interactions with National Environmental Standards for Air Quality

A total of 25 submitters commented on the National Environmental Standards (NES) for Air Quality. Many raised concerns about the interaction between this NES and the NPS-UD at a high level. Others specified areas of concern.

Key theme

- Greenfield development leads to a reliance on cars, which increases emissions. Intensification is preferred to manage air quality, and the NPS-UD policies should reflect this.

Interactions with New Zealand Coastal Policy Statement

A total of 15 submitters commented on the New Zealand Coastal Policy Statement (NZCPS). Many raised concerns about the interaction between the NZCPS and the NPS-UD at a high level. Others specified areas of concern.

Key themes

- Apply a longer-term focus in FDSs for coastal areas. The concern was that climate change will lead to rising sea levels, and this will affect coastal areas. Currently, an FDS looks only 30 years ahead, but the rates of sea level rise suggest that looking 100 years ahead in coastal areas could be necessary.
- Coastal hazards and areas of significance should be identified in FDSs.

Interactions with national planning standards

A total of 40 submitters commented on the national planning standards. Many raised concerns about the interaction between national planning standards and the NPS-UD at a high level. Others specified areas of concern.

Key themes

- National planning standards would clarify definitions such as a 'quality urban environment', densities and typologies. Guidance on intensification could help councils achieve policies in the NPS-UD.
- National planning standards could provide a framework for FDSs.
- A standardised approach to planning would not work for some areas because there are varying capacity, infrastructure and geographic constraints across the country. A national planning standard would limit flexibility, which is important when facing different circumstances.

Company name	Given names	Surname	Submitter type
	Daniel	Carter	Individual
	David	Chambers	Individual
	Linda	Conning	Planning/urban design professional
	Malc	Dartnall	Planning/urban design professional
	Jessica	de Heij	Individual
	Damian	Duthie	Individual
	Peter	Dyhrberg	Individual
	Wendy	Fergusson	Individual
	Peter	Findlay	Developer
	Rebecca	Forgesson	Individual
	Lionel Owen	Foster	Individual
	Richard	Gaddum	Individual
	Carole	Gordon	Individual
	Michael	Gorman	Individual
	Sheila	Hailstone	Individual
	Rachel	Hall	Planning/urban design professional
	David	Hattam	Planning/urban design professional
	Kit	Howden	Individual
	Glyn Michael	Hunt	Academic/research community
	Jennifer Jean	Jack	Individual
	Rae	James	Individual
	Tim	Jenkins	Individual
	Louise	Johnston	Individual
	Dave	Kelly	Individual
	Daniel	Kinnoch	Planning/urban design professional
	Johanna	Klein	Individual
	John	Lawson	Individual
	Nicholas	Lee	Individual
	Kara	Lipski	Individual
	John	Mackay	Planning/urban design professional
	Clifford Paul	Mason	Individual
	Katrina	McCallum	Individual
	Will	McNab	Individual
	Andrew	Mercer	Individual
	Siobhan	Murphy	Individual
	Jill	Nuthall	Individual
	Heidi	O'Callahan	Individual
	Natalie	O'Rourke	Individual
	Matthew	Paetz	Planning/urban design professional
	Craig	Palmer	Individual

Company name	Given names	Surname	Submitter type
	Dr Kenneth	Palmer	Academic/research community
	Sarah	Parker	Individual
	Gregory	Partridge	Individual
	James Scott	Pringle	Individual
	Andrew	Riddell	Planning/urban design professional
	Pita	Rikys	Individual
	Kay	Robertson	Individual
	Benjamin William	Ross	Individual
	Graeme	Scott	Planning/urban design professional
	Vicky	Southworth	Individual
	R Martin	Taylor	Individual
	Suzanne	Vallance	Academic/research community
	Kathleen and Steve	Vitasovich	Individual
	Eleanor	West	Individual
	Graham	White	Individual
1962	Alison Victoria	Robins	Individual
A & B George / E & B Jeffs	Fiona	Aston	Developer
Aggregate and Quarry Association	Wayne	Scott	Business/industry
AgResearch Limited (AgResearch)	Graeme	Mathieson	Academic/research community
Anonymous			Horticultural sector
Anonymous			Hapū/iwi/Māori
Anonymous			Crown entity
Anonymous			Developer
Ara Poutama Aotearoa (Department of Corrections)	Andrea	Millar	Central government
Auckland Council			Local government
Auckland District Health Board and Waitematā District Health Board			Crown entity
Avon Loop Planning Association	Cilla	Clements	Environmental NGO/heritage/ community group
BARNZ	Gillian	Chappell	Business/industry
Bay of Plenty Regional Council	Adam	Fort	Local government
Beckenham Neighbourhood Association Incorporated	Peter	Tuffley	Environmental NGO/heritage/ community group
Bluehaven Holdings Ltd	Jade	Murphy	Developer
Blueskin Energy Ltd	Scott	Willis	Infrastructure provider
Bunnings Limited	Rebecca	Sanders	Business/industry
Candor3 Limited			Business/industry

Company name	Given names	Surname	Submitter type
Canterbury District Health Board	Chantal	Lauzon	Crown entity
Central Otago District Council	David	Campbell	Local government
Christchurch City Council	Ellen	Cavanagh	Local government
Christchurch Civic Trust	Ross	Gray	Environmental NGO/heritage/ community group
Christchurch International Airport Limited	Jo	Appleyard	Infrastructure provider
Civic Trust Auckland	Audrey	van Ryn	Environmental NGO/heritage/ community group
Classic Group	Libby	Gosling	Developer
Commercial & Industrial Consultants Ltd	Colin	Jones	Business/industry
Community Housing Aotearoa	Scott	Figenshow	Environmental NGO/heritage/ community group
DPA and CCS Disability Action	Prudence	Walker	Environmental NGO/heritage/ community group
Dunedin City Council	Anna	Johnson	Local government
Electricity Networks Association (ENA)	Richard	Le Gros	Infrastructure provider
Environment Canterbury	Steve	Lowndes	Local government
Environmental Noise Analysis and Advice Service (Southern Monitoring Services Ltd)			Planning/urban design professional
Far North District Council			Local government
Federated Farmers of New Zealand	Gavin	Forrest	Business/industry
First Gas Ltd	Natalie	Webb	Infrastructure provider
FIT Wellington (Fair, Intelligent Transport)	Kerry	Wood	Environmental NGO/heritage/ community group
Fletcher Building Limited	Aidan	Donnelly	Developer
Foodstuffs (N.Z.) Limited	Melissa	Hodd	Business/industry
Ford Land New Zealand	Jeff	Fletcher	Business/industry
Forest & Bird	Erika	Toleman	Environmental NGO/heritage/ community group
Fulton Hogan Limited	Don	Chittock	Infrastructure provider
Future Proof Implementation Committee	Bill	Wasley	Local government
Gisborne District Council	Alice	Kranenburg	Local government
Greater Christchurch Partnership	Keith	Tallentire	Local government
Greater Wellington Regional Council	Helen	Plant	Local government
Grey Power New Zealand Federation Inc	Pete	Matcham	Environmental NGO/heritage/ community group

Company name	Given names	Surname	Submitter type
habito	Kelvin	Choi	Individual
Hamilton City Council	Paul	Bowman	Local government
Hawke's Bay District Health Board	Bernard	Te Paa	Crown entity
Hawke's Bay Regional, Hastings District, Napier City, and Central Hawke's Bay District	Mark	Clews	Local government
Hill Young Cooper Ltd	David	Mead	Planning/urban design professional
Historic Places Aotearoa Inc.	James	Blackburne	Environmental NGO/heritage/community group
Historic Places Canterbury	Lynne	Lochhead	Environmental NGO/heritage/community group
Historic Places Wellington	Felicity	Wong	Environmental NGO/heritage/community group
Horowhenua District Council (HDC)	David	Clapperton	Local government
Hugh Green Limited	Juliana	Cox	Developer
Human Rights Commission	Paula	Tesoriero	Crown entity
Hutt City Council	Helen	Oram	Local government
ICOMOS New Zealand	Amanda	Mulligan	Environmental NGO/heritage/community group
Infrastructure New Zealand			Infrastructure provider
Inner City West Neighbourhood Association Incorporated	Diana	Shand	Environmental NGO/heritage/community group
J Swaps	Dudley	Clemens	Business/industry
John Mackay (Urban Strategy) Ltd	John	Mackay	Planning/urban design professional
Kapiti Coast District Council			Local government
Kiwi Property Group Limited	Rebecca	Sanders	Developer
KiwiRail Holdings Limited (KiwiRail)	Rebecca	Beals	Infrastructure provider
Liveable Design Ltd	Yvonne Beth	Weeber	Planning/urban design professional
Local Government New Zealand	Tom	Simonson	Professional body
Lyttelton Port Company Limited	Jo	Appleyard	Infrastructure provider
M & M Partnership	Marcel Pierre	Wainohu	Individual
Mackenzie District Council	Ann	Rodgers	Local government
Manawatu District Council	Richard	Templer	Local government
Market Economics Limited	Douglas	Fairgray	Planning/urban design professional
Marlborough District Council	Emma	Toy	Local government
Masterton District Council	Kathryn	Ross	Local government

Company name	Given names	Surname	Submitter type
Mount Victoria Residents' Association Inc (MVRA)	Angela	Rothwell	Environmental NGO/heritage/ community group
Mt Victoria Historical Society	Joanna	Newman	Environmental NGO/heritage/ community group
Muaupoko Tribal Authority	Rebekah	Willis-Hori Te Pa	Hapū/iwi/Māori
Nelson Marlborough District Health Board	Peter	Bramley	Crown entity
New Plymouth District Council	Juliet	Johnson	Local government
New Zealand Airports Association	Kevin	Ward	Business/industry
New Zealand Automobile Association Incorporated	Simon, Sarah	Douglas, Geard	Business/industry
New Zealand Centre for Sustainable Cities	Philippa	Howden-Chapman	Academic/research community
New Zealand Law Society	Bronwyn	Carruthers	Professional body
New Zealand Nurses Organisation	Di	Cookson	Professional body
New Zealand Planning Institute	David	Curtis	Professional body
New Zealand Society of Local Government Managers	Raymond	Horan	Professional body
Nga Maunga Whakahii o Kaipara			Hapū/iwi/Māori
Northland Regional Council	Justin	Murfitt	Local government
NZ Kiwifruit Growers Inc (NZKGI)			Business/industry
Orion New Zealand Limited	Jo	Appleyard	Infrastructure provider
Otago Regional Council	Anita	Dawe	Local government
Oyster Capital	Rebecca	Sanders	Developer
Palmerston North City Council	David	Murphy	Local government
Pine Valley Orchards Ltd	Jeff	Fletcher	Developer
Porirua City Council	Michael	Rachlin	Local government
Porter Group Limited (PGL) and its subsidiaries Remarkables Park Limited (RPL) and Shotover Park (SPL)	Brian	Fitzpatrick	Developer
Potentialis Ltd	Angela	Goodwin	Planning/urban design professional
Powerco Limited	Cheryl	Cleary	Infrastructure provider
Property Council New Zealand	Leonie	Freeman	Professional body
Queenstown Lakes District Council	His Worship the Mayor Jim Boulton	Mike Theelen	Local government
Recovered Energy Australia Pty Ltd	Craig	Eyes	Infrastructure provider

Company name	Given names	Surname	Submitter type
Redcliffs Residents Association	Patricia	McIntosh	Environmental NGO/heritage/ community group
Regenerate Christchurch	Ivan	Iafeta	Environmental NGO/heritage/ community group
Regional Public Health	Anna	Robertson-Bate	Crown entity
Registered Master Builders Association (RMBA)	David	Kelly	Professional body
Renters United	Robert	Whitaker	Environmental NGO/heritage/ community group
Resource Management Law Association of New Zealand Inc	Karol	Helmink	Professional body
Retirement Policy and Research Centre Auckland	M. Claire	Dale	Academic/research community
Retirement Villages Association of New Zealand	Nicola	de Wit	Business/industry
Riccarton Bush-Kilmarnock Residents Association	Tony	Dale	Environmental NGO/heritage/ community group
Richmond Residents and Business Association Submission	David	Duffy	Environmental NGO/heritage/ community group
Robert Manthei	Robert	Manthei	Individual
Selwyn District Council	Jesse	Burgess	Local government
SmartGrowth	Bill	Wasley	Local government
SmartGrowth Combined Tangata Whenua Forum			Hapū/iwi/Māori
Solari Architects Ltd	James	Solari	Business/industry
Southern Cross Hospitals Limited	Bianca	Tree	Business/industry
Southern DHB			Crown entity
Spark New Zealand Trading Limited	Graeme	McCarrison	Infrastructure provider
Stride Property Limited	Bianca	Tree	Developer
Suburban Estates Ltd	Fiona	Aston	Developer
Survey and Spatial New Zealand			Professional body
Sustainability Options	Jo	Wills	Business/industry
Taranaki Regional Council	Basil	Chamberlain	Local government
Taranaki Whānui ki Te Upoko o Te Ika/ Port Nicholson Block Settlement Trust			Hapū/iwi/Māori
Tasman District Council and Nelson City Council	Jenny	Tyne	Local government
Tauranga City Council	Marty	Grenfell	Local government
Te Arawa River Iwi Trust	TARIT	TARIT	Hapū/iwi/Māori

Company name	Given names	Surname	Submitter type
Te Atiawa Manawhenua Ki Te Tau Ihu Trust	Sylvie	Heard	Hapū/iwi/Māori
Te Rūnanga o Ngāi Tahu	Rebecca	Clements	Hapū/iwi/Māori
Te Whakakitenga o Waikato Incorporated for Waikato-Tainui	Donna	Flavell	Hapū/iwi/Māori
Te Whare Roimata Trust	Jenny	Smith	Environmental NGO/heritage/community group
Tenants Protection Association (ChCh) Inc	Penny	Arthur	Environmental NGO/heritage/community group
Thames Coromandel District Council			Local government
The Institute of Geological and Nuclear Sciences Te Pū Ao	Scott	Kelly	Academic/research community
The New Zealand Refining Company Ltd	David	King	Infrastructure provider
The Parliamentary Commissioner for the Environment	Amy	Harrison	Central government
Thorndon Society Incorporated			Environmental NGO/heritage/community group
Timaru District Council			Local government
Tourism Industry Aotearoa	Steve	Hanrahan	Business/industry
Transport Special interest Group	Bill	McMaster	Infrastructure provider
Transpower New Zealand Limited	N/A	N/A	Infrastructure provider
Tupuna Maunga O Tamaki Makaurau Authority	Dominic	Wilson	Hapū/iwi/Māori
Universalform			Planning/urban design professional
Upper Hutt City Council	Ike	Kleynbos	Local government
Urban Design Forum			Professional body
UrbPlan 705 – Sustainable Infrastructure	Matthew	Paetz	Academic/research community
Vector Limited	Robyn	Holdaway	Infrastructure provider
Victoria Neighbourhood Association Inc	Marjorie	Manthei	Environmental NGO/heritage/community group
Waikato District Council	Donna	Tracey	Local government
Waikato District Health Board	Richard	Wall	Crown entity
Waikato Regional Council	Tracey	May	Local government
Waimakariri District Council	Trevor	Ellis	Local government
Waipa District Council			Local government
Waitomo District Council	Cathy	O'Callaghan	Local government
Waste Management NZ Ltd	Kate	Mackintosh	Business/industry

Company name	Given names	Surname	Submitter type
Waterfall Park Developments Limited	Warwick	Goldsmith	Developer
WEL Networks Limited	Karleen	Broughton	Infrastructure provider
Wellington City Council	Kevin	Lavery	Local government
Western Bay of Plenty District Council	Phillip	Martelli	Local government
Whakatāne District Council			Local government
Whangārei District Council	Tony	Horton	Local government
Whimbrel Limited (W2)	James	Carr	Planning/urban design professional
Williams Corporation Limited	Kathryn	Marshall	Developer
Wine Marlborough	Vance	Kerslake	Horticultural sector
Zero Carbon Nelson Tasman	Bruce James	Gilkison	Environmental NGO/heritage/ community group

Consultation questions

- 1 Do you support a National Policy Statement on Urban Development that aims to deliver quality urban environments and make room for growth? Why/Why not?
 - Are there other tools under the RMA, other legislation or non-statutory tools that would be more effective in achieving a quality urban environment and making room for growth?
- 2 Do you support the approach of targeting the most directive policies to our largest and fastest growing urban environments? Why/why not?
 - Do you support the approach used to determine which local authorities are categorised as major urban centres? Why/why not?
 - Can you suggest any alternative approaches for targeting the policies in the NPS-UD?
- 3 Do you support the proposed changes to future development strategies (FDSs) overall? If not, what would you suggest doing differently?
 - Do you support the approach of only requiring major urban centres to undertake an FDS? Would there be benefits of requiring other local authorities to undertake a strategic planning process?
 - What impact will the proposed timing of the FDS have on statutory and other planning processes? In what way could the timing be improved?
- 4 Do you support the proposed approach of the NPS-UD providing national level direction about the features of a quality urban environment? Why/why not?
 - Do you support the features of a quality urban environment stated in draft objective O2? Why/why not?
 - What impacts do you think the draft objectives O2–O3 and policies P2A–P2B will have on your decision-making?
- 5 Do you support the inclusion of proposals to clarify that amenity values are diverse and change over time? Why/why not?
 - Do you think these proposals will help to address the use of amenity to protect the status quo?
 - Can you identify any negative consequences that might result from the proposed objective and policies on amenity?
 - Can you suggest alternative ways to address urban amenity through a national policy statement?
- 6 Do you support the addition of direction to provide development capacity that is both feasible *and likely to be taken up*? Will this result in development opportunities that more accurately reflect demand? Why/why not?
- 7 Do you support proposals requiring objectives, policies, rules, and assessment criteria to enable the development anticipated by the zone description? Why/why not?

- Do you think requiring zone descriptions in district plans will be useful in planning documents for articulating what outcomes communities can expect for their urban environment? Why/why not?
 - Do you think that amenity values should be articulated in this zone description? Why/why not?
- 8 Do you support policies to enable intensification in the locations where its benefits can best be achieved? Why/why not?
- What impact will these policies have on achieving higher densities in urban environments?
 - What option/s do you prefer for prescribing locations for intensification in major urban centres? Why?
 - If a prescriptive requirement is used, how should the density requirements be stated? (For example, 80 dwellings per hectare or a minimum floor area per hectare).
 - What impact will directly inserting the policy to support intensification in particular locations through consenting decisions have?
- 9 Do you support inclusion of a policy providing for plan changes for out-of-sequence greenfield development and/or greenfield development in locations not currently identified for development?
- How could the example policy better enable quality urban development in greenfield areas?
 - Are the criteria in the example policy sufficiently robust to manage environmental effects ensure a quality urban environment, while providing for this type of development?
 - To what extent should developers be required to meet the costs of development, including the costs of infrastructure and wider impacts on network infrastructure, and environmental and social costs (recognising that these are likely to be passed onto future homeowners and beneficiaries of the development)? What impact will this have on the uptake of development opportunities?
 - What improvements could be made to this policy to make development more responsive to demand in suitable locations beyond areas already identified for urban development?
- 10 Do you support limiting the ability for local authorities in major urban centres to regulate the number of car parks required for development? Why/why not?
- Which proposed option could best contribute to achieve quality urban environments?
 - What would be the impact of removing minimums in just high- and medium-density, commercial, residential and mixed-used areas, compared with all areas of a major urban centre?
 - How would the 18-month implementation timeframe impact on your planning processes?
 - What support should be considered to assist local authorities when removing the requirement to provide car parking to ensure the ongoing management of car parking resources?

- 11 Do you think that central government should consider more directive intervention in local authority plans?
 - Which rules (or types of rules) are unnecessarily constraining urban development?
 - Can you identify provisions that are enabling higher-density urban development in local authority plans that could be provided for either nationally or in particular zones or areas?
 - Should a minimum level of development for an individual site be provided for across urban areas (for example, up to three storeys of development is a permitted activity across all zones)?
 - Given the potential interactions with the range of rules that may exist within any given zone, how could the intent of more directive approaches be achieved?
- 12 Do you support requirements for all urban environments to assess demand and supply of development capacity, and monitor a range of market indicators? Why/why not?
- 13 Do you support inclusion of policies to improve how local government works with iwi, hapū and whānau to reflect their values and interests in urban planning?
 - Do you think the proposals are an appropriate way to ensure urban development occurs in a way that takes into account iwi and hapū concerns?
 - How do you think local authorities should be directed to engage with Māori who do not hold mana whenua over the urban environment in which they now live?
 - What impacts do you think the proposed NPS-UD will have on iwi, hapū and Māori?
- 14 Do you support amendments to existing NPS-UDC 2016 policies to include working with providers of development and other infrastructure, and local authorities cooperating to work with iwi/hapū? Why/why not?
- 15 What impact will the proposed timing for implementation of policies have?
- 16 What kind of guidance or support do you think would help with the successful implementation of the proposed NPS-UD?
- 17 Do you think there are potential areas of tension or confusion between any of these proposals and other national direction? If so, please identify these areas and include any suggestions you have for addressing these issues.
- 18 Do you think a national planning standard is needed to support the consistent implementation of proposals in this document? If so, please state which specific provisions you think could be delivered effectively using a national planning standard.

Questions from Appendix 3

- A1. Do you support the changes to the HBA policies overall? Are there specific proposals you do or do not support? What changes would you suggest?
- A2. What do you anticipate the impact of the proposed policies (and any related changes) would be on planning and urban outcomes?

- A3. Are the margins proposed in policies AP3 and AP12 appropriate? If not, what should you base alternative margins on? (eg, using different margins based on higher or lower rural–urban price differentials).
- A4. How could these policies place a greater emphasis on ensuring enough development capacity at affordable prices?
- A5. Do you support the approach of targeting the HBA requirements only to major urban centres? Why/why not?

Glossary and commonly used acronyms

Brownfield	previously developed land with existing infrastructure
FDS	Future Development Strategy
Greenfield	undeveloped land without infrastructure
HBA	Housing and Business Development Capacity Assessment
HUD	Ministry for Housing and Urban Development
LUC	Land Use Capability
Mana Whakahono a Rohe	an iwi participation arrangement entered into under the Resource Management Act 1991
MfE	Ministry for the Environment
MUC	major urban centre
NES	national environmental standard
NPS	national policy statement
NGO	non-government organisation
NPS-UD	proposed National Policy Statement for Urban Development
NPS-UDC 2016	National Policy Statement on Urban Development Capacity 2016
Reverse sensitivity	economic burdens or operational limitations placed on an existing lawfully established activity due to complaints from newly established activities.
RMA	Resource Management Act 1991
Section 32 report	an evaluation report required by section 32 of the Resource Management Act 1991