

10 October 2019

National Policy Statement on Urban Development Consultation  
Ministry for the Environment  
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## **PROPOSED NATIONAL POLICY STATEMENT ON URBAN DEVELOPMENT – SURVEY AND SPATIAL NEW ZEALAND SUBMISSION**

### ***Who are we and what is our unique contribution to housing and urban development?***

Survey and Spatial New Zealand (S+SNZ, the trading name of the New Zealand Institute of Surveyors) represents surveyors and spatial professionals. We are a stakeholder across a wide range of government policy areas and the sector including housing development, land subdivision, construction, infrastructure, spatial information and resource management. Our members are involved in each stage of urban developments and infrastructure projects. They are also the lead professionals enabling connections between the earth sciences, engineering and applied geography and so have an excellent end to end overview that is hard to obtain if only involved in one stage.

### ***Do we support the proposed National Policy Statement on Urban Development?***

Survey and Spatial New Zealand supports the Urban Growth Agenda. Overall, we support the proposed planning approach in the proposed National Planning Statement on Urban Development (NPS UD) to enable room for growth that benefits urban areas, and which is based on good information to inform decision-making by local authorities. The approach should be enabling rather than prescriptive, whilst acknowledging the place for standards and consistency where appropriate.

### ***What are our specific comments?***

#### **Future development strategy (Section 4 of Discussion Document)**

Survey and Spatial New Zealand supports the amendment of the National Policy Statement-Urban Development Capacity 2016 so that local authorities are required to produce a Future Development Strategy (FDS) that shows how and where they will provide for future development. However, there is some concern that local authorities may take even longer to produce an FDS.

Proposed policy P1D (h) (i) should also include estimates of contributions from all funding sources (where available) and not just local authority contributions to development infrastructure.

### Making room for growth (Section 5 of Discussion Document)

Survey and Spatial New Zealand generally supports matters raised in this section. In particular, we support:

- notification of the Minister for the Environment if a local authority cannot meet requirements under the NPS UD for development capacity so that discussions can begin with Government on how to address that (refer to Page 31 of the Discussion Document)
- zone descriptions setting the outcomes for development (refer to Page 33 of the Discussion Document)
- the most directive policies for intensification applying only to major urban centres as that is where the greatest benefits will be realized relative to compliance costs (refer to Page 35 of the Discussion Document)
- immediate application of Policy P6B requiring regional councils to include the following objective into their regional policy statements: *“To enable residential intensification that ensures the efficient use of existing urban land, infrastructure, services and facilities”* (refer to Page 36 of the Discussion Document)
- a descriptive approach to intensification in district plans in preference to a prescriptive approach (refer to page 37 of the Discussion Document)
- inclusion of a policy providing for plan changes for out-of-sequence greenfield development and/or greenfield developments in locations not currently identified for development as that would be more enabling for changing circumstances not originally envisaged (refer to page 40 of the Discussion Document)
- removing minimum car parking requirements (refer to page 40 of the Discussion Document), especially in areas providing for more intensive development (refer to page 40 of the Discussion Document)
- the shift in planning culture to enable urban development while appropriately managing its effects that could include standardisation of site coverage and height etc nationally to enable higher density urban development in major urban centres (refer to pages 45-46 of the Discussion Document)

However, S+SNZ notes the following:

- that “visual amenity” or, more widely, “amenity values” be considered for inclusion as part of the wider description of things that contribute to quality environment (refer to page 27 of the Discussion Document)
- in relation to “amenity values” - any proposed clarification would need to better define the scope of the terms “diverse” and “change over time”. Uncertainty could potentially lead to applications to the Environment Court, especially where there are vested interests. Similarly, in relation to “quality urban environment”, objective assessment would be assisted by setting out its features to enable good decision-making. (Refer to page 30 of the Discussion Document.)
- further work is required on density definitions citing dwelling numbers per hectare if a prescriptive approach were to be adopted (refer to page 37 of the Discussion Document).

Evidence for good decision-making (Section 6 of the Discussion Document)

It is critical that decision-making be informed and based on evidence that is authoritative and current.

Additional factors are that the information needs to be updated and maintained over time, and the results of the decision-making need to be monitored and reported.

Timing (Section 8 of the Discussion Document)

Survey and Spatial New Zealand considers that quarterly reporting of housing indicators may be too frequent and impose a greater than necessary compliance costs on local authorities. Six monthly report may be more appropriate.

We also note that Figure 2 (page 55 of the Discussion Document) will mean that implementation of NPS UD intensification policies and planning standards take from 2024 until 2029 to be implemented in major urban areas. As this is constrained by implementation through district plans, it means that there will be an unacceptably long period before benefit realization. Any extension of the 18-month timeframe from gazettal of the NPS UD to notify intensification plan changes will delay implementation even further and, consequently, is not supported by S+SNZ.

Guidance and implementation support (Section 9 of the Discussion Document)

An implementation programme for NPS UD is essential. In addition to the guidance material etc for local authorities, consideration should also be given to preparation of materials targeted at professionals interacting with local authorities on NPS UD matters to ensure seamless operation and efficiency following “implementation”.

The document states that if Ministerial and Cabinet approval is given, the proposed NPS is likely to take effect during the first half of 2020. It is important that its implementation provides any necessary transitional measures so as not to cause to further delay to developments already under consideration at that time.

Alignment with other national direction under the RMA (Section 109 of the Discussion Document)

The proposed NPS UD is one of several proposed NPSs released for public comment. They are not mutually exclusive. Some aspects are complementary while for other aspects there is the potential for conflict, particularly in relation to land use. In particular, ensuring there is enough land for development (NPS UD) and ensuring productive land is retained (proposed National Policy Statement for Highly Productive Land). Also piping of streams may be necessary to enable urban development.

These overlaps need to be managed effectively and inevitably there will be trade-offs requiring decision. It is important that the decision-making process is efficient, robust and transparent.

***Other considerations***

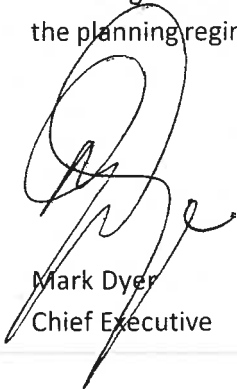
Evaluation of new NPS UD policies

A number of new policies are proposed as part of the NPS UD. It is important that provision be made for their review and evaluation in line with best practice so that any problems relating to their implementation and effect can be determined and corrected. The review period may be different for different policies.

### Management of development cycles

A key related issue is the management of development cycles in the medium and long-term. The current housing crisis was exacerbated by the 2008 Global Financial Crisis which had a profound impact. Development stopped. Trades persons and professionals in the sector sought other employment (including overseas) and student numbers significantly decreased in a number of critical areas with downstream impact resulting in subsequent shortages of skilled persons in the wider construction sector.

It takes somewhere from three to upwards of five years to “crank” up the system from the time of economic upturn to the delivery of houses. The lesson from this, for the future, is that it is important to maintain capacity and in times of economic downturn and local authorities/government should step in to fulfil this function. Whilst this aspect is not strictly within the scope of the present consultation it does relate to sector capacity and is important context particularly as it has been known for a long time that immigration has and will create housing demand in the foreseeable future. Unless the planning regime is supported by sector capacity, the government’s outcomes will not be delivered.



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