
BEFORE THE HEARINGS PANEL ON BEHALF OF CENTRAL OTAGO DISTRICT COUNCIL

UNDER THE The Resource Management Act 1991 (**Act**)
IN THE MATTER of Plan Change 19 Residential Chapter Provisions
BETWEEN **TOPP PROPERTY INVESTMENTS 2015 LTD**
AND **CENTRAL OTAGO DISTRICT COUNCIL**

STATEMENT OF EVIDENCE OF JOANNE SKUSE FOR TOPP PROPERTY INVESTMENTS 2015 LTD

INTRODUCTION

1. My full name is Joanne Skuse
2. I hold the qualification of Bachelors of Law (LLB) from the University of Exeter, United Kingdom. I have 5.5 years' experience in planning and resource management, and I also hold New Zealand Planning Associate membership.
3. I am a Senior Planner at The Property Group, and I have worked at The Property Group since 10 May 2021.
4. My recent project work has included advising on multiple master planned subdivision proposals, including undertaking environmental effects assessments for both rural and urban subdivisions, preparing consent applications, consultation with affected and interested parties and appearing at Council hearings. In addition, I have also been involved in a

number of large scale projects that have dealt with the amenity effects, and reverse sensitivity effects of change in land use in rural areas.

5. I have been involved in the Gore District Council Proposed Plan review as a Consultant drafting district wide and location specific chapters. I have also lead the preparation of a residential development area, upzoning rural land appropriately for urban development.
6. Directly prior to joining The Property Group I was employed at the Queenstown Lakes District Council (**Council** or **QLDC**) from February 2017 to April 2021, where I held role of Planner.
7. As part of my roles at QLDC I processed numerous consent applications in the QLDC urban areas and for sites within the rural Outstanding Natural Landscape and Rural Character Landscape areas.

Code of Conduct

8. I have read the Environment Court's Code of Conduct for Expert Witnesses in the Environment Court of New Zealand Practice Note 2014, and I agree to comply with it. My qualifications and experience as an expert are set out above. I confirm that the issues addressed in this brief of evidence are within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed.

SUMMARY OF EVIDENCE

SCOPE OF EVIDENCE

9. The scope of this submission is the same as that that was lodged in our initial submission on the Proposed Plan Change. This evidence makes comment on the recommending report. While we agree with many of the recommendations that have been added in response to the submissions that have been received, there are still many outstanding issues (and consequential amendments that are sought).
10. This evidence focuses on the two most important matters that the submitter wishes to raise. These are the matters around the Future Growth Overlay and the underlying zone, which the submitter is seeking to be Low Density Residential along with the minimum lot size to decrease. The submitter is also asking for the Comprehensive Residential Development suite of Objectives, Policies and Rules to apply to the site in lieu of a rule that allows for a structure plan or outline plan.

Site description

11. This submission on behalf of Topp For clarity the submission that was lodged referred to the entire Future Growth Overlay. However, the submitter has

particular interest in the site shown below within the Future Growth Overlay.

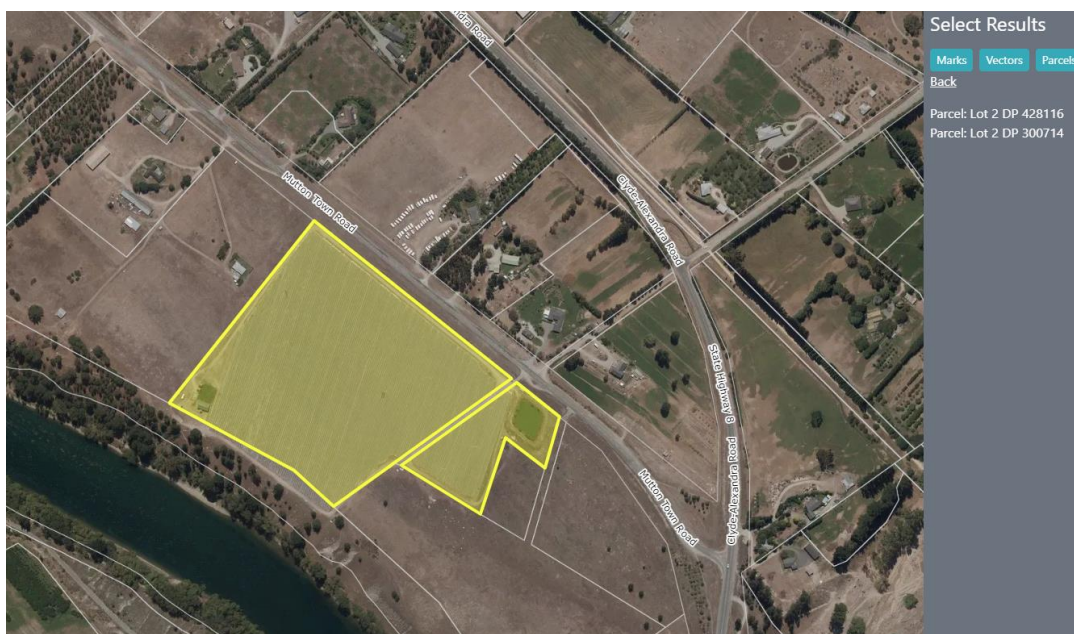


Figure 1: Subject Site Lot 2 DP300714, Lots 1-2 DP 428116

COMMENT ON PLANNING REPORT

Future Growth Overlay and Residential Zoning

12. The section 42A report makes comment on the Future Growth Overlay at Paragraph 85. As was discussed in our initial submission it is considered that the NPS-UD applies to Central Otago's urban areas. The email that was attached within Appendix 2 of the Section 42A report from Mike Hurley does not appear to confirm that CODC does not meet the criteria to be considered a Tier 3 local authority. Rather this email simply spells out what the NPS-UD states.

13. Further the s42A report states that the usually resident population needs to be 10,000 (Footnote 7). With respect this is not what the NPS UD states. The NPS UD States:

The definition of an "urban environment" means any area of land (regardless of size, and irrespective of local authority or statistical boundaries) that:

- (a) is, or is intended to be, predominantly urban in character; and
- (b) is, or is intended to be, part of a **housing and labour market** of at least 10,000 people

14. This number (10,000) needs to look at the housing market and the labour market. There may well be interdependencies between say Pisa Moorings where there are limited jobs in Pisa Moorings and people commute to Cromwell or Alexandra for work. That would mean that Pisa Moorings and Cromwell is part of the same housing and labour market. The same can be said for Cromwell and Alexandra, Clyde and so on. All Tier 3 Council have assessed their districts this way. Glenorchy for example is considered as part

of the Queenstown Urban Area because of the interdependency between the housing and labour markets. Gore and Mataura are the same.

15. The reason that this is important is that the NPS UD give strong encouragement to Tier 3 Local Authorities around implementing Parts 2 and 3 of the NPS-UD.
16. In this submission, it is submitted that in order to implement the Objectives and Policies of the NPS UD the following must be done to give effect to the objectives and policies. Part 3.2(2) requires that sufficient plan-enabled land needs to be provided (for this site) over the medium to long term (see paragraph 85 of the section 42A report). Part 3.4(1)(b) of the NPS-UD is relevant and states that:

in relation to the medium term, either paragraph (a) applies, or it is on land that is zoned for housing or for business use (as applicable) in a proposed district plan
17. The current Proposed District Plan does not intend to zone the land located within the Future Growth Overlay as urban but proposes to leave it rural. That means that the land is not plan enabled and 3.4 of the NPS-UD cannot be met. This is just one example of how the NPS UD is not being met by the Proposed District Plan in its current form.
18. Another example is the Density enabled under the Proposed District Plan. As is relevant to this submission, the Low Density Residential zone is proposed to allow of lots that are going to double in size from 250m² to 500m².
19. As a rule of thumb developers estimate land value on a per square metre basis. At the moment land in Cromwell sells for between \$850 and \$1000/m² so if you wanted to buy a 250m² piece of land it would cost approximately \$250,000. If you wanted to buy a 450m² piece of land it would cost approximately \$445,000. To a first home buyer that first section that would comply under the current district plan would cost \$250,000 but under the new district plan that first section will cost almost \$500,000. This does not meet Objective 2 of the NPS-UD.
20. Increasing the density in Zones does not help to support competitive land and development markets, and leaving land that has been earmarked for re-zoning to low density residential in the Vincent Spatial Plan does not achieve that objective either.

Comprehensive Development

21. The section 42A report has stated that it is not considered to be an appropriate pathway to allow for structure plans to be consented in Lieu of a plan change for land earmarked as Future Urban Growth Overlay. This is accepted to the extent that the submitter has had another look at the provisions and instead of adding new provisions to the proposed district plan, perhaps a more efficient way would be to zone the Future Growth Overlay land to the Low Density Residential Zone (as intended by the Vincent Spatial Plan) and require a Comprehensive Residential Development

application as a Discretionary Activity that specifically requires infrastructure capacity to be addressed.

22. That way the Future Urban Growth Overlay land is zoned urban (and compliance with the NPS-UD can be achieved) but allowance is made to consider the matters that have been raised in the Section 42A report at paragraph 85.

Minimum Lot size and Density

23. It is further submitted that the minimum Lot size under the current district plan is 250m² within the Residential Resource Area. It is accepted that at page 18 of the Vincent Spatial Plan Low Density residential is shown as 400-900m². The Cromwell Masterplan however showed detached dwellings being able to occur on Section with a minimum Lot size of 300m² (page 30 of the Cromwell Spatial Framework). These calculations were based on densities.

24. The specific site is a large area and would likely be developed as a comprehensive development site meaning that densities as high as 1 dwelling per 250m²/300m² would be appropriate. Therefore, it is proposed that as part of a comprehensive development in the Low Density Zone density (and corresponding lot sizes) of a density of 250m² would be allowed for.

POLICY AND OBJECTIVES, AND RULES

<u>LRZ-O3</u>	<u>Comprehensive Development</u>
<u>Provide for comprehensively designed, large lot residential development on larger sites, at higher densities, where it:</u>	
<u>1. provides opportunities for a diversity of housing types choice;</u>	
<u>2. is designed to respond positively to its context and the features of the site;</u>	
<u>3. is compatible connected with the urban of to nearby centres and community facilities areas;</u>	
<u>4. provides a well-connected movement transport network and usable public open spaces and streetscapes; and</u>	
<u>5. maintains a high open space to built form ratio with large setbacks from adjoining sites and a clustered built form.</u>	
<u>LRZ-PXX</u>	<u>Comprehensive Development</u>
<u>Provide for comprehensively designed, medium density residential development on larger sites, at higher densities, where it:</u>	
<u>1. provides opportunities for a diversity of housing types;</u>	
<u>2. is designed to respond positively to its context and the features of the site;</u>	
<u>3. is connected to nearby centres and community facilities areas;</u>	

<p>4. <u>provides a well-connected transport network and usable public open spaces and streetscapes; and</u></p> <p>5. <u>achieves the built form outcomes in LLRZ.</u></p>	
LRZ-P6	Future Growth Overlay
<p>Recognise and provide for rezoning of land <u>OR resource consent applications</u> within the Future Growth Overlay, where:</p> <ol style="list-style-type: none"> 1. It is demonstrated as necessary to meet anticipated demand; and 2. It is able to be serviced by reticulated water and wastewater networks. 	
LRZ-R1	Residential Units
Low Density Residential Zone	<p>Activity Status: PER</p> <p>Where:</p> <ol style="list-style-type: none"> 1. There are no more than <u>two</u> residential units per site. <p>And the activity complies with the following rule requirements:</p> <p><u>LLRZ-S1 to LLRZ-S7, except where the residential units are within an area for which a Comprehensive Residential Development Master Plan has been approved, and non-compliance with any rule requirement has been considered through that resource consent.</u></p>
LRZ-RXX	Comprehensive Residential Development (Future Growth Overlay)
Low Density Residential Zone	<p>Activity Status: DIS</p> <p>Matters of discretion are restricted to:</p> <ol style="list-style-type: none"> a. Provision for housing diversity and choice, relative to other residential areas. b. How the development responds to its context and site features, including solar orientation, views, existing buildings and vegetation, and,

	<p>within Precinct 1, the Clyde Heritage Precinct.</p> <p>c. Whether the urban form is compatible with the nearby land use mix, including providing convenient access to commercial centres and community facilities.</p> <p>d. The extent to which the development provides well-connected and legible movement networks, integrating all access modes, with priority for walking and cycling.</p> <p>e. The location, extent and quality of public open space and streetscapes taking into account servicing and maintenance requirements.</p> <p>f. The Incorporation of Crime Prevention Through Environmental Design (CPTED) principles to achieve a safe and secure environment.</p> <p>g. Whether the configuration of blocks and lots will allow for development that can readily achieve the outcomes sought in LRZ.</p> <p>h. Where the application also seeks provision for future built development to breach any of the rule requirements, discretion is also restricted to those matters specified in the relevant rule requirement.</p> <p><u>i. For applications on land within the future growth overlay particular regard is to be had to the capacity and timing of services.</u></p>	
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	<u>j. Or any other matter that might be relevant to the application</u>	
LRZ-S1	Density	
Low Density Residential Zone	The Minimum site area per residential unit is 300m ² <u>per site.</u> If a Comprehensive Residential Development Plan has been approved then the density as stipulated in that plan shall be a minimum of 250m ² per dwelling.	NC
SUB-RX	Subdivision of land where each allotment contains an existing principal residential unit, or where a land use consent has been obtained, or is applied for concurrently, under MRZ-R1, <u>LRZ</u> , and <u>LLRZ</u>	
SUB-S1	Minimum Allotment Size	Activity Status where compliance is not achieved:
Large Lot Residential Zone Precinct 2	7. The minimum Lot size shall be no less than 400m ² <u>300m²</u>	NC

SUMMARY

25. Overall, This submitter, is generally disappointed by the recommendations that have been made in the section 42A report to the extend that submissions in our view have not been given due consideration and the appropriate higher order documents like the NPS-UD and the Regional Policy Statement have not been given appropriate regard. This has resulted in large tracts of future urban land that is required to meet the development capacity for the district in the medium term not being **plan enabled**.
26. Further consequences have been applying larger minimum lot sizes which it is submitted will not count towards affordability in the district (the medium density zone alone cannot achieve this¹), and not having the ability to apply for comprehensive development over large areas of residential land as can currently be done under the Operative district Plan.

Joanne Skuse



Senior Planner

Attachments

Appendix 1: Table responding to comments from the Section 42A report

Appendix 2: NPS-UD

¹ This has not been expanded on further in this response but related to the nature of the housing stock and the typical lot sizes in the parts of the district where medium density zoning is proposed. It is not considered that the Chum that would be required to meet the development capacity can come from this zoning.

	Submission Point	Section 42a Response	Submitter response
1.	MRZ-O2, MRZ-P1 and MRZ-P2 should be amended to highlight amenity and character is anticipated to change over time	<p>Given MRZ-O2 and LRZ-O2 already refers to “anticipated” amenity values, and the submitter does not identify alternate wording to address their concern, I do not recommend a change in response to this submission point.</p> <p>“I consider it more appropriate to make a minor change to MRZ-O2.2 to acknowledge that it is expected that this zone will change over time (noting I do not consider the same applies to the LRZ).</p> <p><i>changes over time to provides a range of housing types, including those of a greater density than other residential zones, making efficient use of land and providing for growth needs</i></p>	This wording is supported by the NPS-UD. Requiring development to maintain the anticipated amenity values of adjacent sites isn’t enabling the character of the zone to change and become medium density.
2.	Seek reinstatement of previous multi-unit development rule	“A restricted discretionary rule is already provided within the PC19 package for multi-unit development (LLRZ-R1; LRZ-R1 and MRZ-R1)”	RD is provided but you have to comply with the standards which limits the density. We submitted to reinstate the rule with the 250m2 lot size. Breaching the new density provision makes this a non-complying activity. The density requirements still apply to all zones other than the Medium Density Rule. It is considered that the same approach that has been taken for the MRZ should be taken for all residential zone providing flexibility of

			form to achieve greater density. This is in line with the current district plan.
3.	MRZ-P7 - question how it will be determined when a further supply of residential land is required	<p>The land currently is not considered necessary to meet short-term demand, but are intended to supply medium-long term demand. servicing is not yet available, or planned.</p> <p>Inclusion in the FGO therefore allows infrastructure providers, including the Council, to start planning for servicing these areas.</p> <p>Do not agree that provision of infrastructure, and particularly wider network upgrades, is a matter that can be addressed through a structure plan.</p> <p>The question of when further supply is required will be determined through monitoring and updating of growth projections, which is a common approach.</p>	<p>The NPS-UD requires plan enabled development capacity for the medium term. Therefore, this zoning is required to be zoned in the Proposed Plan in terms of residential supply now.</p> <p>Infrastructure servicing will need to be worked through as part of this plan change.</p>
4.	MRZ-R1 should be amended to allow for up to three units	"I do not consider that the density standard on its own is sufficient to achieve the outcomes sought with respect to built form"	Accepted and this can be dealt with under the Comprehensive development rule.
5.	MRZ-R2 'Define Comprehensive Residential Development Master Plan'	can be addressed by amending the rule title and definition to just refer to 'Comprehensive Residential Development'.	Hasn't followed through into drafting of MRZ-R2
6.	Amend MRZ-R3 to provide for only one minor unit per principal rather than site	Rule amended: There is a maximum of one minor residential unit per principal residential unit on any site	Agree with approach
7.	MRZ-R7 – Amend rule to enable visitor accommodation activity in minor residential units as well as principal units. Amend to remove permitted standard 3.	<p>Agree with clarifying this in the rule to enable activity in minor units.</p> <p>Agree with removing the requirement for access to the site to not be shared with another site.</p>	Agree with approach

8.	Amend MRZ-R19 provide for hazards as a restricted discretionary activity	<p>“The approach to managing built development in hazard areas, including activity status, reflects the Operative Plan... No review of these has been undertaken as part of PC19 and therefore there is no technical information to support changes to these.... the appropriate time to review the specific requirements is when the natural hazards matters are reviewed”</p>	<p>Don't agree with this approach. A Non-Complying activity status (operative district plan) is too broad when matters that relate to hazards can often be dealt with via engineering input and this input should be limited to the hazard being addressed therefore restricted discretionary is appropriate.</p> <p>The response from the reporting planner highlights the issues with a partial plan review.</p> <p>In this instance there has been a submission relating to an overlay within the residential chapter. Relief is sought and it is appropriate to do so now as this could potentially be missed in the future.</p>
9.	Amend MRZ-S1 to provide for a density of 150m2 rather than 200m2	<p>With respect to larger and comprehensively planned development, I note that the comprehensive development pathway provides for greater flexibility, as this provides a restricted discretionary activity consent pathway, regardless of density.</p> <p>Recommended to be retained on basis of urban design advice</p>	<p>Agree that density can fall away if comprehensive development is being undertaken. Note we have requested that the comprehensive development rule relate to the Low Density Residential Zone as well in this instance it may be appropriate to have a minimum density of 250m².</p>
10.	Amend MRZ-S4 to provide for 50% site coverage	<p>Feasibility testing has occurred in relation to the MRZ standards which were tested by urban designers as part of the PC19 drafting phase.</p>	<p>Has feasibility work been undertaken to confirm the built standards can be achieved? The matters of discretion put too much emphasis on open space</p>

		40% was recommended so as to provide for a more open and spacious feel within the Central Otago context, with their testing identifying that a 50% building coverage would provide for potentially large and continuous built forms that in their view, would likely be too urban. 40% retained	and space around buildings. This is an MDR zone, and the focus should be ensuring open space and amenity is derived from recreation reserves and other public amenity spaces. How can you be too urban in a MDR zone?
11.	Amend MRZ-S8 to decrease landscape permeability;	a 30% requirement provides for adequate provisions of both buffer and screen planting between buildings, fence lines, car parking and access ways with opportunities for more substantial landscape areas to support larger tree planting.	This can be worked through in an application under the comprehensive development rule.
12.	Remove MRZ-S10	Partially amended to remove “principal bedroom, 3m in depth and 3m in width” Based on urban design advice	How does this reconcile with a 1m yard setback? Question whether this has been tested.
13.	MRZ-S12 – Remove standard. Restricts potential housing typologies such as walk-up apartments	Amended to: <u>Any residential unit must have a habitable room located at ground floor level, unless the unit (excluding access to it) is located entirely above the ground floor level</u> Required for street activation	Disagree with approach. The MDR provisions should enable designs such as walk-up apartments, such typologies can still achieve street activation.
14.	MRZ-S13 - minimum car parking requirements have been removed for Tier 3 Councils	The NPS-UD is not considered to apply to the Central Otago District and therefore the requirements can be retained.	It is strongly recommended that this is looked at again please see the Section 32 Evaluation Report ¹ that the

¹ [section-32-report-v61.pdf \(orc.govt.nz\)](#), page 217

		In absence of any technical review, I do not consider it appropriate to amend the current standards.	ORC has done in relation to the Proposed Regional Policy Statement. It is considered that the CODC meet both limbs of the Urban Environment test.
15.	Medium Density Guidelines should be explicitly referred to in matters of discretion to provide weight	The reason it was not included was that its inclusion could limit the flexibility of design options and affect the ability of Council to update the Design Guide. Guidance is provided in the Design Guide as to how the matters in those rules will be considered, with the Design Guide outlining how the policy direction can be met. Either leave as is, or include as matter of discretion “any guideline published by Council”	Note that there may be procedural difficulties to documents that are incorporated by reference. As a rule of thumb any guideline should be incorporated by reference, or simply left as “any other matter” to be considered. A hybrid is confusing and inappropriate.
16.	Replace Low Density Zone with General Residential Zone	“LRZ consistent with Spatial Plans. This difference in the NP Standards descriptions appears to be that the LRZ is referred to as having buildings predominantly with a suburban scale, whereas the GRZ refers to a mix of building types. In my view, the appropriate zone to apply is the one that describes what is anticipated moving forwards, not simply a continuation of what has happened previously. In this regard, higher intensity development may exist in the LRZ, but under PC19 these are intended to be focused in the MRZ”	It is considered that General residential best suits the development pattern of the district. Central Otago does not contain any large cities with complex nuanced zoning. Therefore the residential zone sometimes needs to be able to accommodate many uses. An example of this is Barry Avenue between Quarry Court and Melmore Terrace. Also the block bounded by Molyneux Avenue, Erris Street, Ray Street and Blyth Street.
17.	Amend future growth areas to development areas identified in national planning standards; and include provisions for the DA in the plan	No change except to add transport infrastructure.	See detailed submission. But cannot meet NPS UD plan enabled development with this approach. It is also considered inefficient

			because it is unknown when a future plan change could be lodged to meet medium term demand. Procedural difficulties as a result of how long it takes to get a district plan to become operative.
18.	Amend LRZ-O2 and LRZ-P1 to highlight amenity and character is anticipated to change over time	Given MRZ-O2 and LRZ-O2 already refers to “anticipated” amenity values, and the submitter does not identify alternate wording to address their concern, I do not recommend a change in response to this submission point. “I consider it more appropriate to make a minor change to MRZ-O2.2 to acknowledge that it is expected that this zone will change over time (noting I do not consider the same applies to the LRZ).	See submission table with suggested objectives and policies that already occur in the Medium Density Zone. This is the relief requested.
19.	LRZ-P6 – Future Growth Overlay Is this a numerical we must wait for before future growth areas can be developed? It is submitted this will frustrate the housing market and increase unaffordability.	The land currently is not considered necessary to meet short-term demand, but are intended to supply medium-long term demand. servicing is not yet available, or planned. Inclusion in the FGO therefore allows infrastructure providers, including the Council, to start planning for servicing these areas. Do not agree that provision of infrastructure, and particularly wider network upgrades, is a matter that can be addressed through a structure plan. The question of when further supply is required will be determined through monitoring and updating of	See detailed submission. But cannot meet NPS UD plan enabled development with this approach. It is also considered inefficient because it is unknown when a future plan change could be lodged to meet medium term demand. Procedural difficulties as a result of how long it takes to get a district plan to become operative.

		growth projections, which is a common approach.	
20.	Amend LRZ-R1 to allow for up to three units per site as a permitted activity	Amended to reduced number to one unit per site due to 'drafting error' "I do not consider that the density standard on its own is sufficient to achieve the outcomes sought with respect to built form"	Agreed but more than 1 residential dwelling will trigger consent. It is submitted that such a consent application would need to meet the density of 1 dwelling per 250m ² as a restricted discretionary activity.
21.	Amend LRZ-S2 to allow for one minor unit per principal unit rather than site	Amended as per submission point	Agreed
22.	Amend LRZ-R6 to enable visitor accommodation activity in minor residential units as well as principal units and remove permitted standard 3	Amended as per submission point	Agreed
23.	Amend LRZ-R18 to provide for building on sites subject to hazards as a restricted discretionary activity	"The approach to managing built development in hazard areas, including activity status, reflects the Operative Plan... No review of these has been undertaken as part of PC19 and therefore there is no technical information to support changes to these.... the appropriate time to review the specific requirements is when the natural hazards matters are reviewed"	A Non-Complying activity status (operative district plan) is too broad when matters that relate to hazards can often be dealt with via engineering input and this input should be limited to the hazard being addressed therefore restricted discretionary is appropriate. The response from the reporting planner highlights the issues with a partial plan review. In this instance there has been a submission relating to an overlay within the residential chapter. Relief is sought and it is appropriate to do so now as this could potentially be missed in the future.
24.	LRZ-S1 – density -	While I accept that the current minimum will increase from	Growth via infill development should be

	<p>'down zoned' as the existing plan allows for a 250m2</p>	<p>250m2 , I have been advised that despite this minimum having applied since around 1990, development has rarely occurred at this density.... is likely to be the effect of other existing standards, particularly building setbacks and site coverage, means it would be difficult to site a complying dwelling on a smaller section. PC19 proposes to amend the residential framework so that higher density is concentrated in the MRZ.</p> <p>Densities are consistent with the modelling undertaken in the development of the Spatial Plan.</p> <p>PC19 zoning framework will not result in under-supply.</p> <p>Recommend reducing 500m2 to 400m2</p>	<p>future proofed now, not restricted. It is not sustainable, or an efficient use of land, to rely on greenfield development alone to provide for growth.</p> <p>This is also factually incorrect refer to the infill development at 8A-8C Ray Street. Also to Wooing Tree, and Prospectors park where minimum lot sizes of 250m² have been taken up</p>
25.	<p>Amend LRZ-S2 to a maximum height of 8m and include provision for chimneys beyond that</p>	<p>Maintain 7.5m; add exemption for chimneys; provide for broader consideration of reasons why a higher height might be appropriate in the matters of discretion</p>	<p>8 metres is standard for a 2 storey house.</p>
26.	<p>Amend LRZ-S5 to a setback of 3m</p>	<p>Reducing the front yard setback in the LRZ, while providing more flexibility for development, could result in a visually distinct contrast emerging between new development and older development. Reduced to 4.5m.</p>	<p>See NPS-UD Policy 6(b)(i) and (ii), this policy relates to amenity values that are anticipated and change. Specifically:</p> <p>that the planned urban built form in those RMA planning documents may involve significant changes to an area, and those changes:</p> <p>(i) may detract from amenity values appreciated by some people but improve amenity values</p>

			<p>appreciated by other people, communities, and future generations, including by providing increased and varied housing densities and types; and</p> <p>(ii) are not, of themselves, an adverse effect.</p> <p>This reasoning does not comply with Policy 6 of the NPS-UD. Therefore it is requested that the relief sought remain at 3m.</p>
27.	LLRZ-P8 – Future Growth Overlay – problematic	<p>The land currently is not considered necessary to meet short-term demand, but are intended to supply medium-long term demand.</p> <p>servicing is not yet available, or planned.</p> <p>Inclusion in the FGO therefore allows infrastructure providers, including the Council, to start planning for servicing these areas.</p> <p>Do not agree that provision of infrastructure, and particularly wider network upgrades, is a matter that can be addressed through a structure plan.</p> <p>The question of when further supply is required will be determined through monitoring and updating of growth projections, which is a common approach.</p>	<p>See detailed submission. But cannot meet NPS UD plan enabled development with this approach. It is also considered inefficient because it is unknown when a future plan change could be lodged to meet medium term demand. Procedural difficulties as a result of how long it takes to get a district plan to become operative.</p>
28.	Delete LLRZ-R1 (limiting number of units per site)	<p>I do not consider that the density standard on its own is sufficient to achieve the outcomes sought with respect to built form.</p>	<p>Disagree considering the coverage and permeable surface area standards are percentages and therefore are relative to the size of lot. What effect is the one unit per site rule trying to mitigate or planning outcome to be achieved,</p>

			<p>when there is a density rule?</p> <p>A site could be subdivided to its minimum lot size and a house built on each unit and would achieve the same outcome as multiple units on one big site. Note a new subdivision rule has been accepted as part of the submissions that allows for subdivision as a controlled activity if development is approved. Reduce to two units per site at density of 1 unit per 250m². Three or more units require a Comprehensive Development via newly inserted RDIS rule.</p>
29.	Amend LLRZ-R2 to provide for one minor unit per principal unit	Amended as per submission point	Agreed
30.	Amend LLRZ-R6 to enable visitor accommodation in minor unit and principal unit and remove permitted standard 3	Amended as per submission point	Agreed
31.	Amend LLRZ-R10 to increase the volume of earthworks permitted	<p>Accepted 200m² (area) is inappropriate.</p> <p>I consider a 500m³ volume to be too high, proposed 200m³.</p> <p>Added exemption for excavation required for construction of a building for which a building consent has been issued.</p>	300m ³ is a more appropriate volume. It is inefficient to need to apply for consent when building dwellings just for earthworks. The QLDC Plan has a 300m ³ minimum volume.
32.	Amend LLRZ-R15 to provide for building on sites subject to hazards as a restricted discretionary activity	<p>"The approach to managing built development in hazard areas, including activity status, reflects the Operative Plan...</p> <p>No review of these has been undertaken as part of PC19 and therefore there is no technical information to support</p>	A Non-Complying activity status (operative district plan) is too broad when matters that relate to hazards can often be dealt with via engineering input and this input should be limited to the hazard being

		<p>changes to these.... the appropriate time to review the specific requirements is when the natural hazards matters are reviewed”</p>	<p>addressed therefore restricted discretionary is appropriate.</p> <p>The response from the reporting planner highlights the issues with a partial plan review.</p> <p>In this instance there has been a submission relating to an overlay within the residential chapter. Relief is sought and it is appropriate to do so now as this could potentially be missed in the future.</p>
33.	<p>LLRZ-S1 - Density – downzoning land and not enabling infill</p>	<p>PC19 has attempted to rationalise the variation in densities, while recognising that in some areas, it is appropriate to retain the current densities to maintain existing amenity and character.</p> <p>I therefore do not consider it appropriate to amend the densities such that the number of variations increase further, particularly where the change sought does not relate to maintaining existing amenity and character. Therefore, while some of the minimum lot sizes proposed in PC19 are higher than the current minimum lot sizes applying, they are consistent with the current average and overall existing amenity and character. ‘additional’ infill development opportunities are not enabled. However, in my view this should be considered in the context of the overall package of zonings</p>	<p>Reference by focusing all supply in MDR not providing varied housing choice. There will be a need for larger lots.</p> <p>We submit that the demand will not only be for MDR lots. The housing market needs to cater for a broad range of housing typologies.</p>

		in PC19, which are anticipated to provide sufficient supply to meet projected demand.	
34.	Amend LLRZ-S2 to provide for a maximum height of 8m	Maintain 7.5m; add exemption for chimneys; provide for broader consideration of reasons why a higher height might be appropriate in the matters of discretion	8m is a typical two storey height, and used in many other District plans eg. Gore District Plan; Queenstown Lakes District Plan
35.	LLRZ-S4 – Building Coverage – is this feasible/been tested	Based on urban design advice. Accept that the coverage will reduce from that currently applying, I note that it is unusual for a zone of this type to have such a high site coverage.	We have not seen this advice, has it been made public as part of the plan change documentation that we could have overlooked?
36.	Submitter considers the Central Otago District to be a Tier 3 Council and accordingly National Policy Statement for Urban Development should apply	Central Otago had not been identified by MHUD as a local authority who was required to remove the car parking requirements see Appendix 2.	Appendix 2 does not say this. Appendix 2 puts the responsibility back on the TA to apply the definition of urban Environment. Appendix 2 states CODC was not 'checked to make sure' parking had been removed. It does not confirm that CODC therefore didn't need to remove them.
37.	The premise of the future growth areas is flawed in that there is no detail or methodology behind when this land can be developed. Rezoning the land now, then requiring a 'Comprehensive Residential Development Master Plan' as per Rule MRZ-R2, or similar mechanism, would be a much more efficient process and cost effective process.	The land currently is not considered necessary to meet short-term demand, but are intended to supply medium-long term demand. servicing is not yet available, or planned. Inclusion in the FGO therefore allows infrastructure providers, including the Council, to start planning for servicing these areas. Do not agree that provision of infrastructure, and particularly wider network upgrades, is a matter that can be addressed through a structure plan.	See detailed submission. But cannot meet NPS UD plan enabled development with this approach. It is also considered inefficient because it is unknown when a future plan change could be lodged to meet medium term demand. Procedural difficulties as a result of how long it takes to get a district plan to become operative. Also it is not considered that the National Planning Standard allows for a future

		<p>The question of when further supply is required will be determined through monitoring and updating of growth projections, which is a common approach.</p>	<p>growth overlay. It does Allow for a development areas. Note the national planning standard does support structure plans as being appropriate for future land use. This is opposite to what the Section 42A report states. There may be procedural issues.</p>
38.			



Te Kāwanatanga o Aotearoa
New Zealand Government

National Policy Statement on Urban Development 2020

May 2022

This National Policy Statement was approved by the Governor-General under section 52(2) of the Resource Management Act 1991 on 20 July 2020, and is published by the Minister for the Environment under section 54 of that Act.

This National Policy Statement replaces the National Policy Statement on Urban Development Capacity 2016.

This version of the National Policy Statement incorporates the following amendments:

1. amendments made by section 77S(1) of the Resource Management Act 1991 (as inserted by the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021)
2. amendments made by the Minister for the Environment under section 53(2) of the Resource Management Act 1991 and notified in the New Zealand Gazette on 11 May 2022 as the National Policy Statement on Urban Development 2020 Amendment No 1.

Contents

Part 1: Preliminary provisions	5
1.1 Title	5
1.2 Commencement	5
1.3 Application	5
1.4 Definitions	5
1.5 Implementation by tier 3 local authorities	9
1.6 Incorporation by reference	9
Part 2: Objectives and policies	10
2.1 Objectives	10
2.2 Policies	10
Part 3: Implementation	14
3.1 Outline of part	14
Subpart 1 – Providing development capacity	14
3.2 Sufficient development capacity for housing	14
3.3 Sufficient development capacity for business land	14
3.4 Meaning of plan-enabled and infrastructure-ready	15
3.5 Availability of additional infrastructure	15
3.6 Housing bottom lines for tier 1 and 2 urban environments	15
3.7 When there is insufficient development capacity	16
Subpart 2 – Responsive planning	16
3.8 Unanticipated or out-of-sequence developments	16
Subpart 3 – Evidence-based decision-making	17
3.9 Monitoring requirements	17
3.10 Assessing demand and development capacity	17
3.11 Using evidence and analysis	18
Subpart 4 – Future Development Strategy (FDS)	18
3.12 Preparation of FDS	18
3.13 Purpose and content of FDS	18
3.14 What FDSs are informed by	19
3.15 Consultation and engagement	19
3.16 Review of FDS	20
3.17 Effect of FDS	20
3.18 FDS implementation plan	20

Subpart 5 – Housing and Business Development Capacity Assessment (HBA)	21
3.19 Obligation to prepare HBA	21
3.20 Purpose of HBA	21
3.21 Involving development sector and others	21
3.22 Competitiveness margin	22
3.23 Analysis of housing market and impact of planning	22
3.24 Housing demand assessment	22
3.25 Housing development capacity assessment	23
3.26 Estimating what is feasible and reasonably expected to be realised	23
3.27 Assessment of sufficient development capacity for housing	24
3.28 Business land demand assessment	24
3.29 Business land development capacity assessment	25
3.30 Assessment of sufficient development capacity for business land	25
Subpart 6 – Intensification in tier 1 urban environments	26
3.31 Tier 1 territorial authorities implementing intensification policies	26
3.32 Qualifying matters	26
3.33 Requirements if qualifying matter applies	27
3.34 Effects on consideration of resource consents	27
Subpart 7 – Development outcomes for zones	27
3.35 Development outcomes for zones	27
3.36 Development outcomes consistent with intensification policies	28
3.37 Monitoring development outcomes	28
Subpart 8 – Car parking	28
3.38 Car parking	28
Part 4: Timing	30
4.1 Timeframes for implementation	30
Appendix: Tier 1 and tier 2 urban environments and local authorities	31

Part 1: Preliminary provisions

1.1 Title

- (1) This is the National Policy Statement on Urban Development 2020.

1.2 Commencement

- (1) This National Policy Statement comes into force on 20 August 2020.
- (2) See Part 4, which sets out timeframes for complying with different parts of this National Policy Statement.

1.3 Application

- (1) This National Policy Statement applies to:
 - (a) all local authorities that have all or part of an urban environment within their district or region (ie, tier 1, 2 and 3 local authorities); and
 - (b) planning decisions by any local authority that affect an urban environment.
- (2) However, some objectives, policies, and provisions in Parts 3 and 4 apply only to tier 1, 2, or 3 local authorities.

1.4 Interpretation

- (1) In this National Policy Statement:

accessible car park means a car park designed and marked (for instance, in accordance with the mobility car parking scheme) for use by persons with a disability or with limited mobility

Act means the Resource Management Act 1991

active transport means forms of transport that involve physical exercise, such as walking or cycling, and includes transport that may use a mobility aid such as a wheelchair

additional infrastructure means:

- (a) public open space
- (b) community infrastructure as defined in section 197 of the Local Government Act 2002
- (c) land transport (as defined in the Land Transport Management Act 2003) that is not controlled by local authorities
- (d) social infrastructure, such as schools and healthcare facilities
- (e) a network operated for the purpose of telecommunications (as defined in section 5 of the Telecommunications Act 2001)
- (f) a network operated for the purpose of transmitting or distributing electricity or gas

business land means land that is zoned, or identified in an FDS or similar strategy or plan, for business uses in urban environments, including but not limited to land in the following:

- (a) any industrial zone
- (b) the commercial zone
- (c) the large format retail zone
- (d) any centre zone, to the extent it allows business uses
- (e) the mixed use zone, to the extent it allows business uses
- (f) any special purpose zone, to the extent it allows business uses

centre zone means any of the following zones:

- (a) city centre zone
- (b) metropolitan centre zone
- (c) town centre zone
- (d) local centre zone
- (e) neighbourhood centre zone

commencement date means the date on which this National Policy Statement comes into force (see clause 1.2)

community services means the following:

- (a) community facilities
- (b) educational facilities
- (c) those commercial activities that serve the needs of the community

competitiveness margin means the margin referred to in clause 3.22

decision-maker means any person exercising functions or powers under the Act

development capacity means the capacity of land to be developed for housing or for business use, based on:

- (a) the zoning, objectives, policies, rules, and overlays that apply in the relevant proposed and operative RMA planning documents; and
- (b) the provision of adequate development infrastructure to support the development of land for housing or business use

development infrastructure means the following, to the extent they are controlled by a local authority or council controlled organisation (as defined in section 6 of the Local Government Act 2002):

- (a) network infrastructure for water supply, wastewater, or stormwater
- (b) land transport (as defined in section 5 of the Land Transport Management Act 2003)

FDS means the Future Development Strategy required by subpart 4 of Part 3

feasible means:

- (a) for the short term or medium term, commercially viable to a developer based on the current relationship between costs and revenue

- (b) for the long term, commercially viable to a developer based on the current relationship between costs and revenue, or on any reasonable adjustment to that relationship

HBA means the Housing and Business Development Capacity Assessment required by subpart 5 of Part 3

infrastructure-ready has the meaning in clause 3.4(3)

long term means between 10 and 30 years

long-term plan means a long-term plan (including the infrastructure strategy required to be included in it) adopted by a local authority under section 93 of the Local Government Act 2002

medium term means between 3 and 10 years

nationally significant infrastructure means all of the following:

- (a) State highways
- (b) the national grid electricity transmission network
- (c) renewable electricity generation facilities that connect with the national grid
- (d) the high-pressure gas transmission pipeline network operating in the North Island
- (e) the refinery pipeline between Marsden Point and Wiri
- (f) the New Zealand rail network (including light rail)
- (g) rapid transit services (as defined in this clause)
- (h) any airport (but not its ancillary commercial activities) used for regular air transport services by aeroplanes capable of carrying more than 30 passengers
- (i) the port facilities (but not the facilities of any ancillary commercial activities) of each port company referred to in item 6 of Part A of Schedule 1 of the Civil Defence Emergency Management Act 2002

planned in relation to forms or features of transport, means planned in a regional land transport plan prepared and approved under the Land Transport Management Act 2003

plan-enabled has the meaning in clause 3.4(1)

planning decision means a decision on any of the following:

- (a) a regional policy statement or proposed regional policy statement
- (b) a regional plan or proposed regional plan
- (c) a district plan or proposed district plan
- (d) a resource consent
- (e) a designation
- (f) a heritage order
- (g) a water conservation order
- (h) a change to a plan requested under Part 2 of Schedule 1 of the Act

public transport means any existing or planned service for the carriage of passengers (other than an aeroplane) that is available to the public generally by means of:

- (a) a vehicle designed or adapted to carry more than 12 persons (including the driver); or
- (b) a rail vehicle; or

- (c) a ferry

qualifying matter has the meaning in clause 3.32

rapid transit service means any existing or planned frequent, quick, reliable and high-capacity public transport service that operates on a permanent route (road or rail) that is largely separated from other traffic

rapid transit stop means a place where people can enter or exit a rapid transit service, whether existing or planned

RMA planning document means all or any of the following:

- (a) a regional policy statement
- (b) a regional plan
- (c) a district plan

short-medium term means within the next 10 years

short term means within the next 3 years

tier 1 local authority means each local authority listed in column 2 of table 1 in the Appendix, and **tier 1 regional council** and **tier 1 territorial authority** have corresponding meanings

tier 2 local authority means each local authority listed in column 2 of table 2 in the Appendix, and **tier 2 regional council** and **tier 2 territorial authority** have corresponding meanings

tier 3 local authority means a local authority that has all or part of an urban environment within its region or district, but is not a tier 1 or 2 local authority, and **tier 3 regional council** and **tier 3 territorial authority** have corresponding meanings

tier 1 urban environment means an urban environment listed in column 1 of table 1 in the Appendix

tier 2 urban environment means an urban environment listed in column 1 of table 2 in the Appendix

tier 3 urban environment means an urban environment that is not listed in the Appendix

urban environment means any area of land (regardless of size, and irrespective of local authority or statistical boundaries) that:

- (a) is, or is intended to be, predominantly urban in character; and
- (b) is, or is intended to be, part of a housing and labour market of at least 10,000 people

well-functioning urban environment has the meaning in Policy 1.

- (2) Terms defined in the Act and used in this National Policy Statement have the meanings in the Act, unless otherwise specified.
- (3) Terms defined in the National Planning Standard issued under section 58E of the Act and used in this National Policy Statement have the meanings in that Standard, unless otherwise specified.
- (4) A reference in this National Policy Statement to a **zone** is:
 - (a) a reference to that zone as described in Standard 8 (Zone Framework Standard) of the National Planning Standard; or

- (b) a reference to the nearest equivalent zone, in relation to local authorities that have not yet implemented the Zone Framework in the National Planning Standard.
- (5) If a local authority is required by this National Policy Statement to make a document publicly available, section 5(3) of the Local Government Act 2002 applies to the requirement as if it was made under that Act.

1.5 Implementation by tier 3 local authorities

- (1) Tier 3 local authorities are strongly encouraged to do the things that tier 1 or 2 local authorities are obliged to do under Parts 2 and 3 of this National Policy Statement, adopting whatever modifications to the National Policy Statement are necessary or helpful to enable them to do so.

1.6 Incorporation by reference

- (1) Clause 2(1) of Schedule 1AA of the Act does not apply to any material incorporated by reference in this National Policy Statement.

Part 2: Objectives and policies

2.1 Objectives

Objective 1: New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.

Objective 2: Planning decisions improve housing affordability by supporting competitive land and development markets.

Objective 3: Regional policy statements and district plans enable more people to live in, and more businesses and community services to be located in, areas of an urban environment in which one or more of the following apply:

- (a) the area is in or near a centre zone or other area with many employment opportunities
- (b) the area is well-serviced by existing or planned public transport
- (c) there is high demand for housing or for business land in the area, relative to other areas within the urban environment.

Objective 4: New Zealand's urban environments, including their amenity values, develop and change over time in response to the diverse and changing needs of people, communities, and future generations.

Objective 5: Planning decisions relating to urban environments, and FDSs, take into account the principles of the Treaty of Waitangi (Te Tiriti o Waitangi).

Objective 6: Local authority decisions on urban development that affect urban environments are:

- (a) integrated with infrastructure planning and funding decisions; and
- (b) strategic over the medium term and long term; and
- (c) responsive, particularly in relation to proposals that would supply significant development capacity.

Objective 7: Local authorities have robust and frequently updated information about their urban environments and use it to inform planning decisions.

Objective 8: New Zealand's urban environments:

- (a) support reductions in greenhouse gas emissions; and
- (b) are resilient to the current and future effects of climate change.

2.2 Policies

Policy 1: Planning decisions contribute to well-functioning urban environments, which are urban environments that, as a minimum:

- (a) have or enable a variety of homes that:
 - (i) meet the needs, in terms of type, price, and location, of different households; and
 - (ii) enable Māori to express their cultural traditions and norms; and

- (b) have or enable a variety of sites that are suitable for different business sectors in terms of location and site size; and
- (c) have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and
- (d) support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and
- (e) support reductions in greenhouse gas emissions; and
- (f) are resilient to the likely current and future effects of climate change.

Policy 2: Tier 1, 2, and 3 local authorities, at all times, provide at least sufficient development capacity to meet expected demand for housing and for business land over the short term, medium term, and long term.

Policy 3: In relation to tier 1 urban environments, regional policy statements and district plans enable:

- (a) in city centre zones, building heights and density of urban form to realise as much development capacity as possible, to maximise benefits of intensification; and
- (b) in metropolitan centre zones, building heights and density of urban form to reflect demand for housing and business use in those locations, and in all cases building heights of at least 6 storeys; and
- (c) building heights of at least 6 storeys within at least a walkable catchment of the following:
 - (i) existing and planned rapid transit stops
 - (ii) the edge of city centre zones
 - (iii) the edge of metropolitan centre zones; and
- (d) within and adjacent to neighbourhood centre zones, local centre zones, and town centre zones (or equivalent), building heights and densities of urban form commensurate with the level of commercial activity and community services.

Policy 4: Regional policy statements and district plans applying to tier 1 urban environments modify the relevant building height or density requirements under Policy 3 only to the extent necessary (as specified in subpart 6) to accommodate a qualifying matter in that area.

Policy 5: Regional policy statements and district plans applying to tier 2 and 3 urban environments enable heights and density of urban form commensurate with the greater of:

- (a) the level of accessibility by existing or planned active or public transport to a range of commercial activities and community services; or
- (b) relative demand for housing and business use in that location.

Policy 6: When making planning decisions that affect urban environments, decision-makers have particular regard to the following matters:

- (a) the planned urban built form anticipated by those RMA planning documents that have given effect to this National Policy Statement
- (b) that the planned urban built form in those RMA planning documents may involve significant changes to an area, and those changes:

- (i) may detract from amenity values appreciated by some people but improve amenity values appreciated by other people, communities, and future generations, including by providing increased and varied housing densities and types; and
- (ii) are not, of themselves, an adverse effect
- (c) the benefits of urban development that are consistent with well-functioning urban environments (as described in Policy 1)
- (d) any relevant contribution that will be made to meeting the requirements of this National Policy Statement to provide or realise development capacity
- (e) the likely current and future effects of climate change.

Policy 7: Tier 1 and 2 local authorities set housing bottom lines for the short-medium term and the long term in their regional policy statements and district plans.

Policy 8: Local authority decisions affecting urban environments are responsive to plan changes that would add significantly to development capacity and contribute to well-functioning urban environments, even if the development capacity is:

- (a) unanticipated by RMA planning documents; or
- (b) out-of-sequence with planned land release.

Policy 9: Local authorities, in taking account of the principles of the Treaty of Waitangi (Te Tiriti o Waitangi) in relation to urban environments, must:

- (a) involve hapū and iwi in the preparation of RMA planning documents and any FDSs by undertaking effective consultation that is early, meaningful and, as far as practicable, in accordance with tikanga Māori; and
- (b) when preparing RMA planning documents and FDSs, take into account the values and aspirations of hapū and iwi for urban development; and
- (c) provide opportunities in appropriate circumstances for Māori involvement in decision-making on resource consents, designations, heritage orders, and water conservation orders, including in relation to sites of significance to Māori and issues of cultural significance; and
- (d) operate in a way that is consistent with iwi participation legislation.

Policy 10: Tier 1, 2, and 3 local authorities:

- (a) that share jurisdiction over urban environments work together when implementing this National Policy Statement; and
- (b) engage with providers of development infrastructure and additional infrastructure to achieve integrated land use and infrastructure planning; and
- (c) engage with the development sector to identify significant opportunities for urban development.

Policy 11: In relation to car parking:

- (a) the district plans of tier 1, 2, and 3 territorial authorities do not set minimum car parking rate requirements, other than for accessible car parks; and

- (b) tier 1, 2, and 3 local authorities are strongly encouraged to manage effects associated with the supply and demand of car parking through comprehensive parking management plans.

Part 3: Implementation

3.1 Outline of part

- (1) This part sets out a non-exhaustive list of things that local authorities must do to give effect to the objectives and policies of this National Policy Statement, but nothing in this part limits the general obligation under the Act to give effect to those objectives and policies.

Subpart 1 – Providing development capacity

3.2 Sufficient development capacity for housing

- (1) Every tier 1, 2, and 3 local authority must provide at least sufficient development capacity in its region or district to meet expected demand for housing:
 - (a) in existing and new urban areas; and
 - (b) for both standalone dwellings and attached dwellings; and
 - (c) in the short term, medium term, and long term.
- (2) In order to be **sufficient** to meet expected demand for housing, the development capacity must be:
 - (a) plan-enabled (*see* clause 3.4(1)); and
 - (b) infrastructure-ready (*see* clause 3.4(3)); and
 - (c) feasible and reasonably expected to be realised (*see* clause 3.26); and
 - (d) for tier 1 and 2 local authorities only, meet the expected demand plus the appropriate competitiveness margin (*see* clause 3.22).

3.3 Sufficient development capacity for business land

- (1) Every tier 1, 2, and 3 local authority must provide at least sufficient development capacity in its region or district to meet the expected demand for business land:
 - (a) from different business sectors; and
 - (b) in the short term, medium term, and long term.
- (2) In order to be **sufficient** to meet expected demand for business land, the development capacity provided must be:
 - (a) plan-enabled (*see* clause 3.4(1)); and
 - (b) infrastructure-ready (*see* clause 3.4(3)); and
 - (c) suitable (as described in clause 3.29(2)) to meet the demands of different business sectors (as described in clause 3.28(3)); and
 - (d) for tier 1 and 2 local authorities only, meet the expected demand plus the appropriate competitiveness margin (*see* clause 3.22).

3.4 Meaning of plan-enabled and infrastructure-ready

- (1) Development capacity is **plan-enabled** for housing or for business land if:
 - (a) in relation to the short term, it is on land that is zoned for housing or for business use (as applicable) in an operative district plan
 - (b) in relation to the medium term, either paragraph (a) applies, or it is on land that is zoned for housing or for business use (as applicable) in a proposed district plan
 - (c) in relation to the long term, either paragraph (b) applies, or it is on land identified by the local authority for future urban use or urban intensification in an FDS or, if the local authority is not required to have an FDS, any other relevant plan or strategy.
- (2) For the purpose of subclause (1), land is **zoned** for housing or for business use (as applicable) only if the housing or business use is a permitted, controlled, or restricted discretionary activity on that land.
- (3) Development capacity is **infrastructure-ready** if:
 - (d) in relation to the short term, there is adequate existing development infrastructure to support the development of the land
 - (e) in relation to the medium term, either paragraph (a) applies, or funding for adequate development infrastructure to support development of the land is identified in a long-term plan
 - (f) in relation to the long term, either paragraph (b) applies, or the development infrastructure to support the development capacity is identified in the local authority's infrastructure strategy (as required as part of its long-term plan).

3.5 Availability of additional infrastructure

- (1) Local authorities must be satisfied that the additional infrastructure to service the development capacity is likely to be available.

3.6 Housing bottom lines for tier 1 and 2 urban environments

- (1) The purpose of the housing bottom lines required by this clause is to clearly state the amount of development capacity that is sufficient to meet expected housing demand plus the appropriate competitiveness margin in the region and each constituent district of a tier 1 or tier 2 urban environment.
- (2) For each tier 1 or tier 2 urban environment, as soon as practicable after an HBA is made publicly available (see clause 3.19(1)):
 - (a) the relevant regional council must insert into its regional policy statement:
 - (i) a housing bottom line for the short-medium term; and
 - (ii) a housing bottom line for the long term; and
 - (b) every relevant territorial authority must insert into its district plan:
 - (i) a housing bottom line for the short-medium term that is the proportion of the housing bottom line for the short-medium term (as set out in the relevant regional policy statement) that is attributable to the district of the territorial authority; and

- (ii) a housing bottom line for the long term that is the proportion of the housing bottom line for the long term (as set out in the relevant regional policy statement) that is attributable to the district of the territorial authority.
- (3) The housing bottom lines must be based on information in the most recent publicly available HBA for the urban environment and are:
 - (a) for the short-medium term, the sum of:
 - (i) the amount of feasible, reasonably expected to be realised development capacity that must be enabled to meet demand, along with the competitiveness margin, for the short term; and
 - (ii) the amount of feasible, reasonably expected to be realised development capacity that must be enabled to meet demand, along with the competitiveness margin, for the medium term; and
 - (b) for the long term, the amount of feasible, reasonably expected to be realised development capacity that must be enabled to meet demand, along with the competitiveness margin, for the long term.
- (4) The insertion of bottom lines must be done without using a process in Schedule 1 of the Act, but any changes to RMA planning documents required to give effect to the bottom lines must be made using a Schedule 1 process.

3.7 When there is insufficient development capacity

- (1) If a local authority determines that there is insufficient development capacity (as described in clauses 3.2 and 3.3) over the short term, medium term, or long term, it must:
 - (a) immediately notify the Minister for the Environment; and
 - (b) if the insufficiency is wholly or partly a result of RMA planning documents, change those documents to increase development capacity for housing or business land (as applicable) as soon as practicable, and update any other relevant plan or strategy (including any FDS, as required by subpart 4); and
 - (c) consider other options for:
 - (i) increasing development capacity; and
 - (ii) otherwise enabling development.

Subpart 2 – Responsive planning

3.8 Unanticipated or out-of-sequence developments

- (1) This clause applies to a plan change that provides significant development capacity that is not otherwise enabled in a plan or is not in sequence with planned land release.
- (2) Every local authority must have particular regard to the development capacity provided by the plan change if that development capacity:
 - (a) would contribute to a well-functioning urban environment; and
 - (b) is well-connected along transport corridors; and
 - (c) meets the criteria set under subclause (3).

- (3) Every regional council must include criteria in its regional policy statement for determining what plan changes will be treated, for the purpose of implementing Policy 8, as adding significantly to development capacity.

Subpart 3 – Evidence-based decision-making

3.9 Monitoring requirements

- (1) Every tier 1, 2, and 3 local authority must monitor, quarterly, the following in relation to each urban environment in their region or district:
 - (a) the demand for dwellings
 - (b) the supply of dwellings
 - (c) prices of, and rents for, dwellings
 - (d) housing affordability
 - (e) the proportion of housing development capacity that has been realised:
 - (i) in previously urbanised areas (such as through infill housing or redevelopment); and
 - (ii) in previously undeveloped (ie, greenfield) areas
 - (f) available data on business land.
- (2) In relation to tier 1 urban environments, tier 1 local authorities must monitor the proportion of development capacity that has been realised in each zone identified in clause 3.37(1) (ie, each zone with development outcomes that are monitored).
- (3) Every tier 1, 2, and 3 local authority must publish the results of its monitoring at least annually.
- (4) The monitoring required by this clause must relate to the relevant urban environments, but may apply more widely (such as, for example, where the relevant data is available only on a region or district-wide basis).
- (5) If more than one tier 1 or tier 2 local authority has jurisdiction over a tier 1 or tier 2 urban environment, those local authorities are jointly responsible for doing the monitoring required by this subpart.

3.10 Assessing demand and development capacity

- (1) Every local authority must assess the demand for housing and for business land in urban environments, and the development capacity that is sufficient (as described in clauses 3.2 and 3.3) to meet that demand in its region or district in the short term, medium term, and long term.
- (2) Tier 1 and tier 2 local authorities comply with subclause (1) in relation to tier 1 and tier 2 urban environments by preparing and publishing an HBA as required by subpart 5.

3.11 Using evidence and analysis

- (1) When making plans, or when changing plans in ways that affect the development of urban environments, local authorities must:
 - (a) clearly identify the resource management issues being managed; and
 - (b) use evidence, particularly any relevant HBAs, about land and development markets, and the results of the monitoring required by this National Policy Statement, to assess the impact of different regulatory and non-regulatory options for urban development and their contribution to:
 - (iii) achieving well-functioning urban environments; and
 - (iv) meeting the requirements to provide at least sufficient development capacity.
- (2) Local authorities must include the matters referred to in subclause (1)(a) and (b) in relevant evaluation reports and further evaluation reports prepared under sections 32 and 32AA of the Act.

Subpart 4 – Future Development Strategy (FDS)

3.12 Preparation of FDS

- (1) Every tier 1 and tier 2 local authority must prepare, and make publicly available an FDS for the tier 1 or 2 urban environment:
 - (a) every 6 years; and
 - (b) in time to inform, or at the same time as, preparation of the next long-term plan of each relevant local authority.
- (2) The FDS must apply, at a minimum, to the relevant tier 1 and 2 urban environments of the local authority, but may apply to any wider area.
- (3) If more than one tier 1 or tier 2 local authority has jurisdiction over a tier 1 or tier 2 urban environment, those local authorities are jointly responsible for preparing an FDS as required by this subpart.
- (4) If a local authority that is not a tier 1 or 2 local authority chooses to prepare an FDS, either alone or with any other local authority, this subpart applies as if it were a tier 1 or 2 local authority, except that any reference to an HBA may be read as a reference to any other document that contains broadly equivalent information.
- (5) An FDS may be prepared and published as a stand-alone document, or be treated as part of any other document (such as a spatial plan).

3.13 Purpose and content of FDS

- (1) The purpose of an FDS is:
 - (a) to promote long-term strategic planning by setting out how a local authority intends to:

- (i) achieve well-functioning urban environments in its existing and future urban areas; and
 - (ii) provide at least sufficient development capacity, as required by clauses 3.2 and 3.3, over the next 30 years to meet expected demand; and
 - (b) assist the integration of planning decisions under the Act with infrastructure planning and funding decisions.
- (2) Every FDS must spatially identify:
- (a) the broad locations in which development capacity will be provided over the long term, in both existing and future urban areas, to meet the requirements of clauses 3.2 and 3.3; and
 - (b) the development infrastructure and additional infrastructure required to support or service that development capacity, along with the general location of the corridors and other sites required to provide it; and
 - (c) any constraints on development.
- (3) Every FDS must include a clear statement of hapū and iwi values and aspirations for urban development.

3.14 What FDSs are informed by

- (1) Every FDS must be informed by the following:
- (a) the most recent applicable HBA
 - (b) a consideration of the advantages and disadvantages of different spatial scenarios for achieving the purpose of the FDS
 - (c) the relevant long-term plan and its infrastructure strategy, and any other relevant strategies and plans
 - (d) Māori, and in particular tangata whenua, values and aspirations for urban development
 - (e) feedback received through the consultation and engagement required by clause 3.15
 - (f) every other National Policy Statement under the Act, including the New Zealand Coastal Policy Statement
 - (g) any other relevant national policy required by, or issued under, legislation.

3.15 Consultation and engagement

- (1) When preparing or updating an FDS local authorities must use the special consultative procedure in section 83 of the Local Government Act 2002.
- (2) In order to prepare the draft required by that procedure, local authorities must engage with the following:
- (a) other local authorities with whom there are significant connections relating to infrastructure or community
 - (b) relevant central government agencies

- (c) relevant hapū and iwi
- (d) providers of additional infrastructure
- (e) relevant providers of nationally significant infrastructure
- (f) the development sector (to identify significant future development opportunities and infrastructure requirements).

3.16 Review of FDS

- (1) Every tier 1 and tier 2 local authority must regularly review its FDS to determine whether it needs updating, and the review must be done in time to inform the next long-term plan (ie, every 3 years).
- (2) The review must:
 - (a) engage with the development sector and landowners to identify significant future development opportunities and associated infrastructure requirements; and
 - (b) consider the most recent HBA.
- (3) If, following the review, the local authority decides that the FDS does not need updating, that decision and the reasons for it must be publicly notified.
- (4) If, following the review, the local authority decides that the FDS is to be updated, the local authority must follow the same processes for consultation as apply to the preparation of an FDS, but only in relation to the aspects proposed to be updated.

3.17 Effect of FDS

- (1) Every tier 1 and tier 2 local authority:
 - (a) must have regard to the relevant FDS when preparing or changing RMA planning documents; and
 - (b) is strongly encouraged to use the relevant FDS to inform:
 - (i) long-term plans, and particularly infrastructure strategies; and
 - (ii) regional land transport plans prepared by a local authority under Part 2 of the Land Transport Management Act 2003; and
 - (iii) any other relevant strategies and plans.

3.18 FDS implementation plan

- (1) Every tier 1 and tier 2 local authority must prepare and implement an implementation plan for its FDS.
- (2) If a tier 1 or tier 2 local authority consists of more than one local authority, the implementation plan must be prepared as a single document by all the local authorities that jointly prepared the FDS.
- (3) Every implementation plan, or part of an implementation plan, must be updated annually.

- (4) An implementation plan or part of an implementation plan:
 - (a) is not part of the FDS to which it relates; and
 - (b) does not need to be prepared using the consultation and engagement requirements set out in clause 3.15; and
 - (c) does not have the effect of an FDS as described in clause 3.17.

Subpart 5 – Housing and Business Development Capacity Assessment (HBA)

3.19 Obligation to prepare HBA

- (1) Every tier 1 and tier 2 local authority must prepare, and make publicly available, an HBA for its tier 1 or tier 2 urban environments every 3 years, in time to inform the relevant local authority's next long-term plan.
- (2) The HBA must apply, at a minimum, to the relevant tier 1 or tier 2 urban environments of the local authority (ie, must assess demand and capacity within the boundaries of those urban environments), but may apply to any wider area.
- (3) If more than one tier 1 or tier 2 local authority has jurisdiction over a tier 1 or tier 2 urban environment, those local authorities are jointly responsible for preparing an HBA as required by this subpart.

3.20 Purpose of HBA

- (1) The purpose of an HBA is to:
 - (a) provide information on the demand and supply of housing and of business land in the relevant tier 1 or tier 2 urban environment, and the impact of planning and infrastructure decisions of the relevant local authorities on that demand and supply; and
 - (b) inform RMA planning documents, FDSs, and long-term plans; and
 - (c) quantify the development capacity that is sufficient to meet expected demand for housing and for business land in the short term, medium term, and long term.

3.21 Involving development sector and others

- (1) In preparing an HBA, every tier 1 and tier 2 local authority must seek information and comment from:
 - (a) expert or experienced people in the development sector; and
 - (b) providers of development infrastructure and additional infrastructure; and
 - (c) anyone else who has information that may materially affect the calculation of the development capacity.

3.22 Competitiveness margin

- (1) A competitiveness margin is a margin of development capacity, over and above the expected demand that tier 1 and tier 2 local authorities are required to provide, that is required in order to support choice and competitiveness in housing and business land markets.
- (2) The competitiveness margins for both housing and business land are:
 - (a) for the short term, 20%
 - (b) for the medium term, 20%
 - (c) for the long term, 15%.

Housing

3.23 Analysis of housing market and impact of planning

- (1) Every HBA must include analysis of how the relevant local authority's planning decisions and provision of infrastructure affects the affordability and competitiveness of the local housing market.
- (2) The analysis must include an assessment of how well the current and likely future demands for housing by Māori and different groups in the community (such as older people, renters, homeowners, low-income households, visitors, and seasonal workers) are met, including the demand for different types and forms of housing (such as for lower-cost housing, papakāinga, and seasonal worker or student accommodation).
- (3) The analysis must be informed by:
 - (a) market indicators, including:
 - (i) indicators of housing affordability, housing demand, and housing supply; and
 - (ii) information about household incomes, housing prices, and rents; and
 - (b) price efficiency indicators.

3.24 Housing demand assessment

- (1) Every HBA must estimate, for the short term, medium term, and long term, the demand for additional housing in the region and each constituent district of the tier 1 or tier 2 urban environment:
 - (a) in different locations; and
 - (b) in terms of dwelling types.
- (2) Local authorities may identify locations in any way they choose.
- (3) Local authorities may identify the types of dwellings in any way they chose but must, at a minimum, distinguish between standalone dwellings and attached dwellings.
- (4) The demand for housing must be expressed in terms of numbers of dwellings.

- (5) Every HBA must:
- (a) set out a range of projections of demand for housing in the short term, medium term, and long term; and
 - (b) identify which of the projections are the most likely in each of the short term, medium term, and long term; and
 - (c) set out the assumptions underpinning the different projections and the reason for selecting the most likely; and
 - (d) if those assumptions involve a high level of uncertainty, the nature and potential effects of that uncertainty.

3.25 Housing development capacity assessment

- (1) Every HBA must quantify, for the short term, medium term, and long term, the housing development capacity for housing in the region and each constituent district of the tier 1 or tier 2 urban environment that is:
- (a) plan-enabled; and
 - (b) plan-enabled and infrastructure-ready; and
 - (c) plan-enabled, infrastructure-ready, and feasible and reasonably expected to be realised.
- (2) The development capacity must be quantified as numbers of dwellings:
- (a) in different locations, including in existing and new urban areas; and
 - (b) of different types, including standalone dwellings and attached dwellings.

3.26 Estimating what is feasible and reasonably expected to be realised

- (1) For the purpose of estimating the amount of development capacity that is reasonably expected to be realised, or that is both feasible and reasonably expected to be realised, local authorities:
- (a) may use any appropriate method; but
 - (b) must outline and justify the methods, inputs, and assumptions used to arrive at the estimates.
- (2) The following are examples of the kind of methods that a tier 1 local authority could use to assess the amount of development capacity that is feasible and reasonably expected to be realised:
- (a) separately estimate the number of feasible dwellings (using a feasibility model) and the number of dwellings that can reasonably be expected to be realised (using building consents data on the number of sites and extent of allowed capacity that has been previously developed), for the short, medium and long term; compare the numbers of dwellings estimated by each method; then pick the lower of the numbers in each time period, to represent the amount of development capacity that is feasible and reasonably expected to be realised

- (b) estimate the number of feasible dwellings or sites, and then assess the proportion of these that can reasonably be expected to be developed in the short, medium and long term, using information about landowner and developer intentions
 - (c) integrate information about past development trends and future landowner and developer intentions into the feasibility model, which could mean modifying assumptions about densities, heights, and timing of development.
- (3) The following is an example of the kind of methods that a tier 2 local authority could use to assess the amount of development capacity that is feasible and reasonably expected to be realised:
- (a) assess the number of dwellings that can reasonably be expected to be developed (using building consents data on the number of sites and extent of allowed capacity that has been developed previously), for the short, medium and long term; and
 - (b) then seek advice from the development sector about what factors affect the feasibility of development.
- (4) Different methods may be appropriate when assessing the development capacity that is reasonably expected to be realised in different circumstances, such as:
- (a) in existing, as opposed to new, urban areas; and
 - (b) for stand-alone, as opposed to attached, dwellings.

3.27 Assessment of sufficient development capacity for housing

- (1) Every HBA must clearly identify, for the short term, medium term, and long term, where there is sufficient development capacity to meet demand for housing in the region and each constituent district of the tier 1 or tier 2 urban environment.
- (2) The requirements of subclause (1) must be based on a comparison of:
 - (a) the demand for housing referred to in clause 3.24 plus the appropriate competitiveness margin; and
 - (b) the development capacity identified under clause 3.25.
- (3) If there is any insufficiency, the HBA must identify where and when this will occur and analyse the extent to which RMA planning documents, a lack of development infrastructure, or both, cause or contribute to the insufficiency.

Business land

3.28 Business land demand assessment

- (1) Every HBA must estimate, for the short term, medium term, and long term, the demand from each business sector for additional business land in the region and each constituent district of the tier 1 or tier 2 urban environment.
- (2) The demand must be expressed in hectares or floor areas.

- (3) For the purpose of this clause, a local authority may identify business sectors in any way it chooses but must, as a minimum, distinguish between sectors that would use land zoned for commercial, retail, or industrial uses.
- (4) The HBA for a tier 1 urban environment must:
 - (a) set out a range of projections of demand for business land by business sector, for the short term, medium term, and long term; and
 - (b) identify which of the projections is the most likely in each of the short term, medium term, and long term; and
 - (c) set out the assumptions underpinning the different projections and the reason for selecting which is the most likely; and
 - (d) if those assumptions involve a high level of uncertainty, the nature and potential effects of that uncertainty.
- (5) The HBA for a tier 2 urban environment must:
 - (a) set out the most likely projection of demand for business land by business sector in the short term, medium term, and long term; and
 - (b) set out the assumptions underpinning that projection; and
 - (c) if those assumptions involve a high level of uncertainty, the nature and potential effects of that uncertainty.

3.29 Business land development capacity assessment

- (1) Every HBA must estimate the following, for the short term, medium term, and long term, for the region and each constituent district of the tier 1 or tier 2 urban environment:
 - (a) the development capacity (in terms of hectares or floor areas) to meet expected demand for business land for each business sector, plus the appropriate competitiveness margin; and
 - (b) of that development capacity, the development capacity that is:
 - (i) plan-enabled; and
 - (ii) plan-enabled and infrastructure-ready; and
 - (iii) plan-enabled, infrastructure-ready, and suitable for each business sector.
- (2) A local authority may define what it means for development capacity to be “suitable” in any way it chooses, but suitability must, at a minimum, include suitability in terms of location and site size.

3.30 Assessment of sufficient development capacity for business land

- (1) Every HBA must clearly identify, for the short term, medium term, and long term, whether there is sufficient development capacity to meet demand for business land in the region and each constituent district of the tier 1 or tier 2 urban environment.

- (2) The requirements of subclause (1) must be based on a comparison of:
 - (a) the demand for business land referred to in clause 3.28 plus the appropriate competitiveness margin; and
 - (b) the development capacity identified under clause 3.29.
- (3) If there is any insufficiency, the HBA must identify where and when this will occur and analyse the extent to which RMA planning documents, a lack of development infrastructure, or both, cause or contribute to the insufficiency.

Subpart 6 – Intensification in tier 1 urban environments

3.31 Tier 1 territorial authorities implementing intensification policies

- (1) Every tier 1 territorial authority must identify, by location, the building heights and densities required by Policy 3.
- (2) If the territorial authority considers that it is necessary to modify the building height or densities in order to provide for a qualifying matter (as permitted under Policy 4), it must:
 - (a) identify, by location, where the qualifying matter applies; and
 - (b) specify the alternate building heights and densities proposed for those areas.
- (3) The territorial authority must make the information required by subclauses (1) and (2) publicly available at the same time as it notifies any plan change or proposed plan change to give effect to Policy 3.

3.32 Qualifying matters

- (1) In this National Policy Statement, **qualifying matter** means any of the following:
 - (a) a matter of national importance that decision-makers are required to recognise and provide for under section 6 of the Act
 - (b) a matter required in order to give effect to any other National Policy Statement, including the New Zealand Coastal Policy Statement
 - (c) any matter required for the purpose of ensuring the safe or efficient operation of nationally significant infrastructure
 - (d) open space provided for public use, but only in relation to the land that is open space
 - (e) an area subject to a designation or heritage order, but only in relation to the land that is subject to the designation or heritage order
 - (f) a matter necessary to implement, or ensure consistency with, iwi participation legislation
 - (g) the requirement to provide sufficient business land suitable for low density uses to meet expected demand under this National Policy Statement
 - (h) any other matter that makes higher density development as directed by Policy 3 inappropriate in an area, but only if the requirements of clause 3.33(3) are met.

3.33 Requirements if qualifying matter applies

- (1) This clause applies if a territorial authority is amending its district plan and intends to rely on Policy 4 to justify a modification to the direction in Policy 3 in relation to a specific area.
- (2) The evaluation report prepared under section 32 of the Act in relation to the proposed amendment must:
 - (a) demonstrate why the territorial authority considers that:
 - (i) the area is subject to a qualifying matter; and
 - (ii) the qualifying matter is incompatible with the level of development directed by Policy 3 for that area; and
 - (b) assess the impact that limiting development capacity, building height or density (as relevant) will have on the provision of development capacity; and
 - (c) assess the costs and broader impacts of imposing those limits.
- (3) A matter is not a qualifying matter under clause 3.32(1)(h) in relation to an area unless the evaluation report also:
 - (a) identifies the specific characteristic that makes the level of development directed by Policy 3 inappropriate in the area, and justifies why that is inappropriate in light of the national significance of urban development and the objectives of this National Policy Statement; and
 - (b) includes a site-specific analysis that:
 - (i) identifies the site to which the matter relates; and
 - (ii) evaluates the specific characteristics on a site-specific basis to determine the spatial extent where intensification needs to be compatible with the specific matter; and
 - (iii) evaluates an appropriate range of options to achieve the greatest heights and densities directed by Policy 3, while managing the specific characteristics.

3.34 Effects on consideration of resource consents

- (1) Nothing in Policies 3 or 4 or this subpart precludes the consideration (under section 104 of the Act) of any actual or potential effects on the environment associated with building heights.

Subpart 7 – Development outcomes for zones

3.35 Development outcomes for zones

- (1) Every tier 1, 2 or 3 territorial authority must ensure that:
 - (a) the objectives for every zone in an urban environment in its district describe the development outcomes intended for the zone over the life of the plan and beyond; and

- (b) the policies and rules in its district plan are individually and cumulatively consistent with the development outcomes described in the objectives for each zone.

3.36 Development outcomes consistent with intensification policies

- (1) Every tier 1 territorial authority must ensure that the development outcomes for zones in its tier 1 urban environments are consistent with the outcomes required by Policy 3.

3.37 Monitoring development outcomes

- (1) Every tier 1 territorial authority must monitor the extent to which development is occurring in each of the following zones as anticipated by the development outcomes included in the objectives for the zone:
 - (a) city centre zones
 - (b) metropolitan centre zones
 - (c) town centre zones
 - (d) mixed use zones
 - (e) high density residential zones
 - (f) medium density residential zones
 - (g) general residential zones.
- (2) If monitoring under this clause indicates that development outcomes are not being realised, the territorial authority must, as soon as practicable:
 - (a) undertake an assessment to identify whether provisions of the district plan (individually and cumulatively), or any other factors (and if so, what factors), or both, are contributing to the failure to realise development outcomes; and
 - (b) give public notice (as defined in the Act) of the results of the assessment.
- (3) If the assessment indicates that provisions of a district plan are contributing to the failure to realise development outcomes, the territorial authority must change its district plan to address the deficiency.
- (4) If the assessment indicates that other factors are contributing to the failure to realise development outcomes, the territorial authority must consider alternative methods to improve the rate of realisation (such as the use of incentives for site amalgamation).
- (5) Any plan change required under subclause (3) must be notified as soon as practicable, and no later than 12 months after the assessment is publicly notified.

Subpart 8 – Car parking

3.38 Car parking

- (1) If the district plan of a tier 1, 2, or 3 territorial authority contains objectives, policies, rules, or assessment criteria that have the effect of requiring a minimum number of car parks to be provided for a particular development, land use, or activity, the territorial authority must change its district plan to remove that effect, other than in respect of accessible car parks.

- (2) Territorial authorities must make any changes required by subclause (1) without using a process in Schedule 1 of the Act.
- (3) Nothing in this National Policy Statement prevents a district plan including objectives, policies, rules, or assessment criteria:
 - (a) requiring a minimum number of accessible car parks to be provided for any activity; or
 - (b) relating to parking dimensions or manoeuvring standards to apply if:
 - (i) a developer chooses to supply car parks; or
 - (ii) when accessible car parks are required.

Part 4: Timing

4.1 Timeframes for implementation

- (1) Every tier 1, 2, and 3 local authority must amend its regional policy statement or district plan to give effect to the provisions of this National Policy Statement as soon as practicable.
- (2) In addition, local authorities must comply with specific policies of this National Policy Statement in accordance with the following table:

Local authority	Subject	National Policy Statement provisions	By when
Tier 1 only	Intensification	Policies 3 and 4 (see Part 3 subpart 6)	Proposed plan or plan change notified no later than 2 years after the commencement date
Tier 2 only (other than a tier 2 territorial authority required by section 80F of the Act to prepare an IPI)	Intensification	Policy 5	Proposed plan or plan change notified no later than 2 years after the commencement date
Tiers 1 and 2	First FDS made publicly available after the commencement date	Policy 2 (see Part 3 subpart 4)	In time to inform the 2024 long-term plan
Tiers 1 and 2	HBA so far as it relates to housing	Policy 2 (see Part 3 subpart 5)	By 31 July 2021
Tiers 1 and 2	HBA relating to both housing and business land	Policy 2 (see Part 3 subpart 5)	In time to inform the 2024 long-term plan
Tiers 1, 2, and 3	Car parking	Policy 11(a) (see clause 3.38)	No later than 18 months after the commencement date

Appendix: Tier 1 and tier 2 urban environments and local authorities

Table 1

Tier 1 urban environment	Tier 1 local authorities
Auckland	Auckland Council
Hamilton	Waikato Regional Council, Hamilton City Council, Waikato District Council, Waipā District Council
Tauranga	Bay of Plenty Regional Council, Tauranga City Council, Western Bay of Plenty District Council
Wellington	Wellington Regional Council, Wellington City Council, Porirua City Council, Hutt City Council, Upper Hutt City Council, Kāpiti Coast District Council
Christchurch	Canterbury Regional Council, Christchurch City Council, Selwyn District Council, Waimakariri District Council

Table 2

Tier 2 urban environment	Tier 2 local authorities
Whangārei	Northland Regional Council, Whangarei District Council
Rotorua	Bay of Plenty Regional Council, Rotorua District Council
New Plymouth	Taranaki Regional Council, New Plymouth District Council
Napier Hastings	Hawke's Bay Regional Council, Napier City Council, Hastings District Council
Palmerston North	Manawatū-Whanganui Regional Council, Palmerston North City Council
Nelson Tasman	Nelson City Council, Tasman District Council
Queenstown	Otago Regional Council, Queenstown Lakes District Council
Dunedin	Otago Regional Council, Dunedin City Council