

**BEFORE THE HEARINGS PANEL
FOR THE QUEENSTOWN LAKES PROPOSED DISTRICT PLAN**

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER OF Stages 3 of the Proposed District Plan

**STATEMENT OF SUPPLEMENTARY EVIDENCE OF SCOTT SNEDDON EDGAR
ON BEHALF OF THE FOLLOWING SUBMITTER:**

SOUTHERN VENTURES PROPERTY LIMITED (SUBMITTER #3190)

31th July 2020



1 This supplementary evidence is prepared in response to Minute 28 which seeks comment on the National Policy Statement on Urban Development 2020 (NPS UD) and addresses the relevance and implications of the NPS UD on the submission of Southern Ventures Property Limited (Southern Ventures)(Submitter #3190).

2 In preparing this supplementary evidence I confirm compliance with the Code of Conduct for Expert Witnesses contained in the Environment Court of New Zealand Practice Note 2014.

3 My relevant qualifications and experience are set out in my evidence in chief dated 29th May 2020.

4 The NPS UD will come into effect on 20th August 2020 and will replace the National Policy Statement on Urban Development Capacity 2016 (NPS UDC).

5 The NPS UD and the NPS UDC are similar in that both statements seek to achieve well-functioning / effective and efficient urban environments that enable people and communities to provide for their wellbeing and direct local authorities to provide for and enable urban development that meets projected demand. The NPS UD and the NPS UDC also seek to achieve responsive and coordinated planning and decision making. The NPS UD is however more directive and seeks to remove constraints so as to enable growth.

6 Objective 2 of the NPS UD is that:

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

7 In comparison the NPS UDC does not include an equivalent objective. Instead Policy PA4 directs that, when making decisions that affect the way and rate at which development capacity is provided, decision makers are to have regard to (among other things) *“Limiting as much as possible adverse impacts on the competitive operation of land and development markets.”*¹.

8 Objective 2 of the NPS UD therefore directs that planning decision makers are to more actively influence land and development markets, improving housing affordability by supporting competitive markets rather than simply having regard to limiting adverse effects on those markets.

¹ NPS UDC Policy PA3c)

- 9 Objective 3 of the NPS UD seeks to achieve urban intensification and this is elaborated on in Policies 3, 4 and 5 (noting that Policies 3 and 4 apply to only tier 1 urban environments) that direct that district plans enable increased heights and densities with the extent of those increases being linked to demand and accessibility to commercial activities and community services. The NPS UDC by comparison does not so explicitly encourage urban intensification.
- 10 This direction towards urban intensification is supported by Objective 4 which is:
- 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.*
- 11 Changing amenity values is elaborated on in Policy 6 which requires that decision-makers have particular regard to (among other things):
- (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*
- 12 In contrast the NPS UDC (the equivalent provisions being Objective OA3 and Policy PA4) does not include the same acknowledgement that, in order to enable urban development and intensification, amenity values will change and that the effects of those changes are not inherently adverse. The NPS UD clarifies this matter and seeks to remove a constraint (being effects on amenity values) that may otherwise limit the enablement of urban development and intensification.
- 13 The NPS UDC focuses on planned and coordinated urban development and ensuring that development capacity is feasible and serviced with development infrastructure. While the NPS

UD includes similar direction in this regard (i.e. that development capacity is to be “infrastructure-ready”) Objective 6 is:

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.

14 This is elaborated upon in Policy 8 which is:

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.

15 The NPS UD therefore directs that local authorities are not bound by strategic planning and are to take advantage of unanticipated opportunities that contribute to development capacity.

16 With regard to development capacity the Objective OA2 and Policies PA1 and PC12 of the NPS UDC direct local authorities to ensure that urban environments have **sufficient capacity** or opportunities for development of housing and business land to meet demand. In addition Policies PC9, PC10 and PC12 direct local authorities to set **minimum targets** for development capacity. While sufficient capacity is defined in the NPS UDC and the NPS UD as the projected demand plus a margin of 20% in the short and medium term and projected demand plus a margin of 15% in the long term² Policy 2 of the NPS UD directs that local authorities provide **at least** sufficient development capacity and Policy 7 replaces NPS UDC’s minimum targets for development capacity with **housing bottom lines**.

² PC1 of the NPS UDC and Clause 3.22 of the NPS UD

- 17 The NPS UD therefore provides clearer direction that local authorities are to provide more development capacity than may necessarily be required at any given time and by doing so address housing affordability by supporting a competitive market.
- 18 With regard to the relief sought by Southern Ventures I consider that the site is accessible and well located in terms of proximity to local services, employment opportunities and transport routes. The site is infrastructure ready and the development capacity it offers is feasible and could be reasonably expected to be realised.
- 19 While no adverse effects on amenity values have been raised in relation to the submission site and the relief sought the NPS UD clarifies that changing amenity values are not in themselves an adverse effect and are to be expected as urban environment grow and evolve.
- 20 I therefore consider that the NPS UD favours allowing the relief sought more explicitly than the NPS UDC does and that the relief sought will assist Council in giving effect to the NPS UD.



Scott Sneddon Edgar

31st July 2020