

13 July 2016

NPS Urban Development Capacity
Ministry for the Environment
PO Box 106483
Auckland City 1143

National Policy Statement on Urban Development Capacity

Auckland Transport thanks the Ministry for the Environment for the opportunity to respond to the Proposed National Policy Statement on Urban Development Capacity ("NPS-UDC").

Auckland Transport fully supports the submission of Auckland Council as both parties have worked closely together on its preparation. Auckland Transport also supports the underlying purpose of the NPS-UDC to ensure a greater focus on enabling urban change and ensuring sufficient development capacity for housing and businesses.

In addition to the points in the submission relating to infrastructure provision, we wish to highlight the following matters which are also relevant:

Funding and investment trade-offs – As outlined in the submission and Council's covering letter, funding is key to the delivery of infrastructure necessary to ensure the provision of adequate development capacity. Even with increased levels of funding it will be necessary to prioritise the allocation thereof, this inevitably requires trade-offs to be made between competing demands for funds. Giving higher priority to servicing provision of development capacity will therefore mean other important investments will be sacrificed.

Route protection and associated consenting constraints – the submission draws attention to the need to protect the routes for this infrastructure at an early stage. Associated with this there needs to be recognition of the lead times required to negotiate the regulatory consenting and land acquisition processes that must precede the provision of infrastructure, in particular for transport routes.

Industry capacity constraints – even when land use planning, infrastructure planning and funding are aligned the capacity of the construction industry to deliver the required infrastructure is finite and of itself could become a constraint.

Yours sincerely


Lester Levy
Chairman

CC:
Stephen Town
Chief Executive, Auckland Council


David Warburton
Chief Executive

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NPS Urban Development Capacity

Auckland Council appreciates the opportunity to respond to the Ministry's draft National Policy Statement on Urban Development Capacity.

Auckland Council ("the council") welcomes the Proposed National Policy Statement on Urban Development Capacity Development ("NPSUDC"). The council supports the underlying purpose of the NPSUDC to ensure a greater focus on enabling urban change and ensuring sufficient development capacity for housing and businesses.

Auckland Council, Auckland Transport and Watercare Services Limited have worked together to prepare this submission, which is attached to this letter.

In this submission, Auckland Council encourages the Ministry to:

- Undertake further refinement in relation to specific definitions used within the draft NPS Urban Development Capacity.
- Acknowledge the importance of funding as key to delivering future infrastructure.
- Recognise that other sectors, such as the construction industry, banking sector and central government all have role to play in delivering good urban outcomes.

The council requests that central government staff continue to work closely with council on the development of robust and timely guidance.

The views of Hibiscus and Bays Local Board, Waiheke Local Board, Orakei Local Board and Whau Local Board are attached to this submission. Please give independent consideration to the Boards' submissions.

I am happy to discuss the content of this submission.

Yours sincerely,

Penny Hulse
Deputy Mayor

Encl: Auckland Council submission and four Local Board submissions.