



6 July 2016

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

Consultation on Proposed National Policy Statement on Urban Development Capacity

We support the intent behind the proposed policy statement to reduce the regulatory barriers to the supply of housing, and therefore reduce the cost of housing relative to income.

We agree that high house prices drive wealth inequality, increase the fiscal burden of housing-related welfare, and pose a risk to the national economy. The regions, such as Waitomo, both rely and support the urban centers which are the key focus of this national policy statement. In order for our regions to function effectively we need our urban centers to be doing the same.

We support the tiered approach of the National Policy Statement to target policies to those places facing the greatest growth challenges while minimising the costs of meeting national direction in places where it is not necessary.

The policies which apply to all local authorities are considered reasonable for smaller local authorities to accommodate as the implementation of these policies can be adapted to fit the situational circumstances of the locality.

We support the focus on Councils providing sufficient residential and business capacity in the short, medium and long term. Having a long term integrated approach to development is key to effective development of any centre, be it urban or rural. In those regional centres which may be facing a declining population, the focus on capacity will not be on increasing capacity per se but making sure that the right type of development capacity is available to meet the changing needs of the community.

We support the assessments of housing and business demand required by policy PB1 in medium and high growth urban areas. We recommend that these assessments are based on statistics which are continually updated as opposed to the fixed figures in Appendix A2. Population projections can change over time for a variety of reasons and the demand assessments should be based on the most recent data available to have the most robust foundation possible.

We query the three yearly timing of the reviews given that a number of the options to implement the required recommendations arising out of these reviews involve amending the relevant plans and policy statements. Amending plans and policy statements can be a lengthy process and may well still be ongoing at the time of the next scheduled review. We would recommend a four or five yearly review cycle be considered.

We view it as a very positive move to require local decision makers to consider the

demand for housing and jobs, and the impact that zoning and development controls will have on people's ability to meet that demand.

We strongly support the move to focus on the positive as well as the negative effects of a development as part of the consenting process. It is important that the contribution an urban development can make to the ability of people, communities and future generations to provide for their social, economic and cultural well-being is considered as part of the consenting process.

Thank you for the opportunity to submit on the proposed National Policy Statement on Urban Development Capacity 2016.

Yours sincerely



BRIAN HANNA
MAYOR