

received 18 July.



**WHANGANUI
DISTRICT COUNCIL**
Te Kaunihera a Rohe o Whanganui

11 July 2016

Ministry for the Environment
PO Box 106483
Auckland City 1143

Attention: NPS Urban Development Team

Re: Feedback on the Proposed National Policy Statement on Urban Development Capacity

Thank you for providing this opportunity for Whanganui District Council to provide feedback on the Proposed National Policy Statement on Urban Development Capacity.

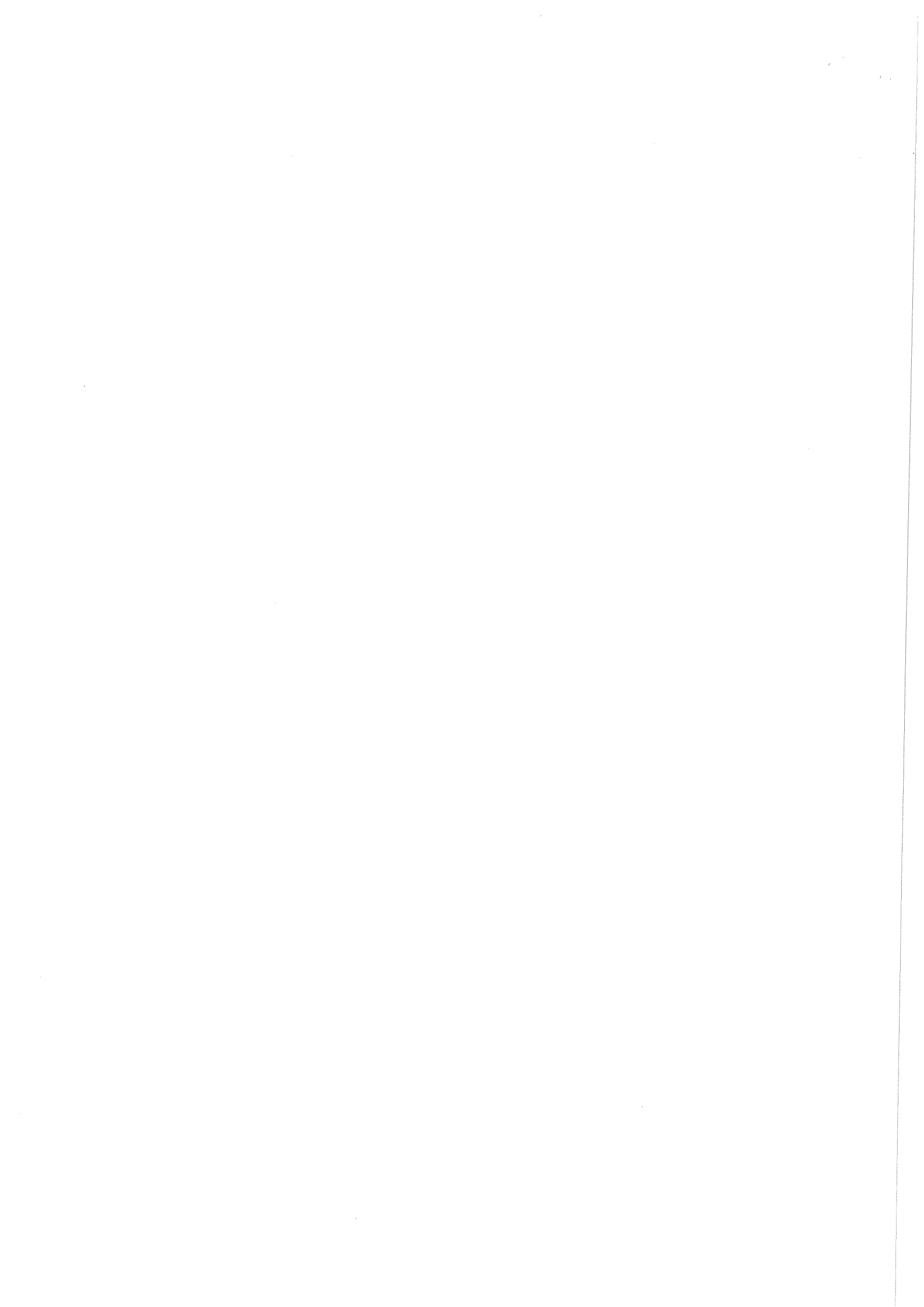
Please consider this letter as our Council's support and endorsement of LGNZ's submission to this consultation.

Council officers have outlined key areas of support, as attached.

Yours sincerely

Kym Fell
Chief Executive

Jonathan Barrett
Planning Manager



Whanganui District Council's feedback on the Proposed National Policy Statement (NPS) on Urban Development Capacity

1. Introduction

- 1.1. The Whanganui District Council appreciates the Ministry for the Environment providing an opportunity for Council to submit on its Proposed NPS on Urban Development Capacity.
- 1.2. Although well intentioned, Government should focus on demand side measures (e.g. population, lending, taxation and regional policy) which have a proportionately stronger influence on housing than supply side measures such as land supply and house numbers.
- 1.3. In consideration of the Planning team's current work programmes, we would like to endorse LGNZ's submission to the proposed NPS.
- 1.4. Our feedback is based on key areas of LGNZ's submission we are supportive of, as highlighted in the following section.

2. Feedback

Focus

- 2.1. We are supportive of LGNZ's recommendation that the focus of NPS should be on:

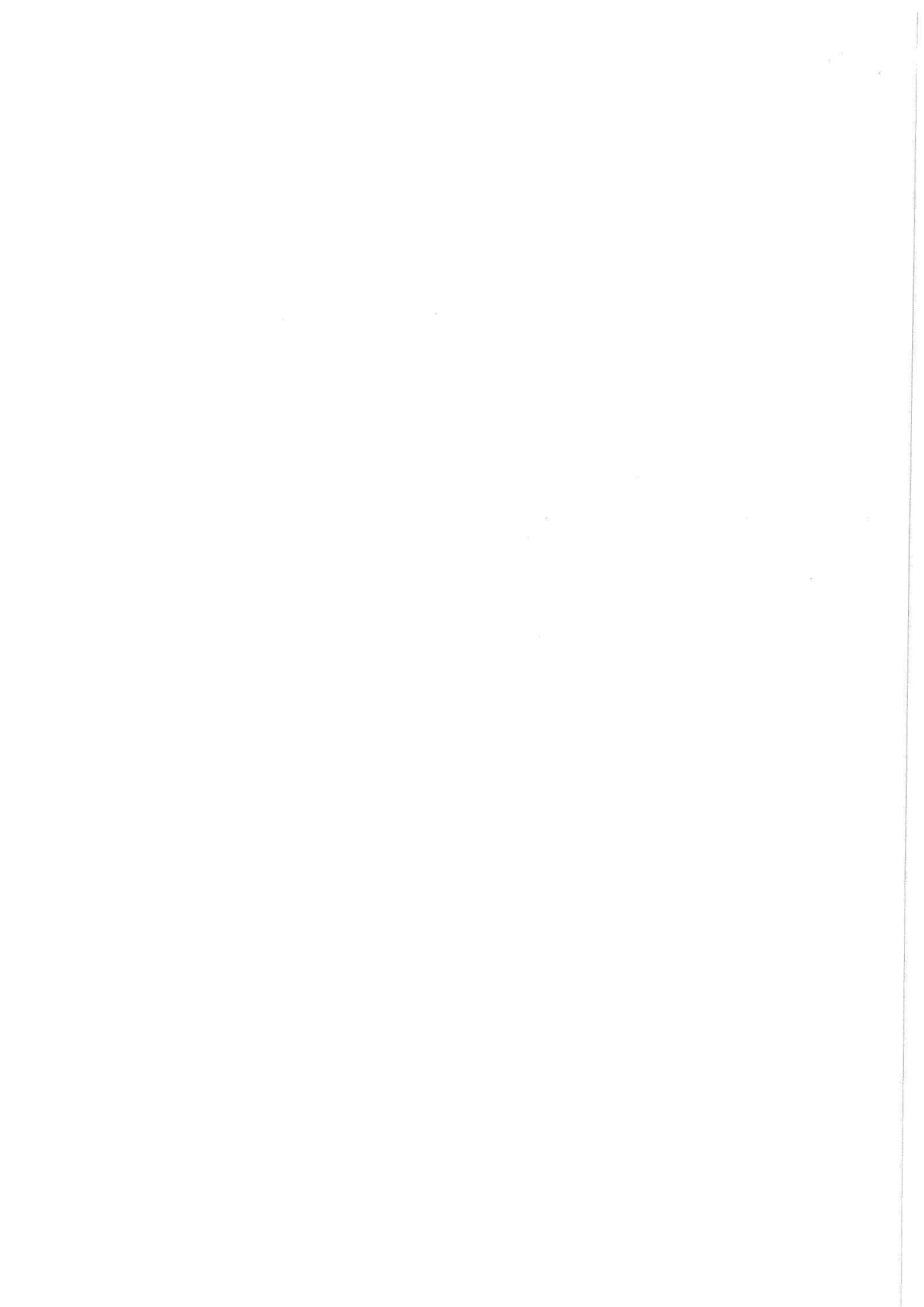
- Funding of infrastructure provision
- Land banking issue
- Potential use of Urban Development Authorities
- Tax regimes to dis-incentivise speculation in residential property
- Skill shortages in construction industry
- Uncompetitive market for building supplies

Improving construction standards and housing stock

- 2.2. We suggest in tandem to the proposed NPS that efforts should be put into improving housing construction standards through the Building Codes as well as the improvement of existing housing stock (eg heating, insulation etc).
- 2.3. We understand this is not strictly discussed in the proposed NPS, but should be considered as a holistic approach in achieving the Proposed NPS objectives.

Local Authority obligation to fund infrastructure

- 2.4. We recommend clearer interpretation of Local Authority's obligation, or otherwise, to fund infrastructure as the current Proposal is not clear in the matter.



- 2.5. We suggest a clearer definition of infrastructure to be worked into the Proposed NPS and accept such a definition should include telecoms, energy, community and other social infrastructure as these have been currently omitted.

Obligations to apply to medium and high growth areas

3. We recommend the Proposed NPS should clearly communicate to be only applicable to Local Authorities with medium and high growth areas within their boundaries. The risk here is the imposition of a valueless and un-resourced additional information collation and reporting requirements which are not relevant or helpful to low growth areas.

Additional reference

4. We recommend the need to reference natural hazards (i.e. flooding, land stability, tsunami etc), protection of built heritage and protection of outstanding natural features/landscapes as constraints to growth.

5. Conclusion

Thank you again for the opportunity for Whanganui District Council to provide feedback. We look forward to the next iteration of the Proposed National Policy Statement on Urban Development Capacity and thank the Ministry for the Environment's work to date.

