

To whom it may concern

As the Chair of the Whau Local Board I would like to contribute the following points to the development of Auckland Council's submission to the draft National Policy Statement on Urban Development Capacity:

- *We agree that Environment needs to be consistently referred to with the other well beings (E.g. add environment to OA1 i.e. To support effective and efficient urban areas that enable people and communities to provide for their social, economic, environmental and cultural wellbeing.);*
- *Note current plan indicates dividing Auckland into four areas. Careful consideration needs to be given as to what would be the best geographic levels the assessments should be done. Note it could be done at multiple levels, Auckland regional, four sub-regions AND at smaller unit aligned to local board clusters, transport and desired principal employment catchments;*
- *In the definitions:*
 - *Infrastructure should include essential council and non-council infrastructure (social/community, open space, power, communication, health and educational);*
 - *Many dwellings in residential areas are also used for home business. The Business and Residential definitions need to take this into account.*
- *Auckland has learnt how important it is that transportation planning is done at the same time as land planning. PA3 should include that when considering the effects of urban development, decision-makers must have regard to commuter and business transport, e.g. the transport times, transport related carbon cost and environmental, economic and social impacts of increased congestion. In the Housing and Business Assessments (PB1), transportation indicators should be included, perhaps reporting on travel times and financial, social and carbon costs of travel and congestion. In PD4 transportation (times, residential and business travel costs and carbon emissions) should be included in the areas to "have particular regard to";*
- *References to land and space seem inconsistent. The use of each term is a very important distinction when considering urban form. (For example PB1 bullet point 2 refers to Business **Land** Assessment but then refers to **floor** area. Suggest it should refer to Business **Space** Assessment.);*
- *Agree that for PB4, the concepts of "engagement" (or perhaps substituting "working with") need to be carefully considered for each influencing and affected sector;*
- *The timing and quantum of Central government funded infrastructure is a critical part of carrying out assessments (PB3). The NPS would be more effective if it gave some direction on how and when central government commitment should be made to assist in forecasting 3, 10 and 30 years ahead or how the assumption of investment should be included;*
- *The costs of assessment should be transparently spread across Council and Central Government (MBiE, MoE, Statistics NZ ?);*

- *Given the high level of concern in the wider community it would be advantageous if the NPS give an indication as to when business and residential individuals and communities (BIDs ? Residents and Ratepayers ?), should be given the opportunity to comment and input and if and when are the assessments public?*
- *Consideration should be made of the potential impact of the release of the 3 yearly assessments and long term assessments on the potential distortion of the property market and the amount of land banking. If there is a potential for market distortion consideration could be given to changing the frequency and the communication process;*
- *In carrying out the assessments in (PB1) and being responsive e.g. giving effect (PD3), the NPS should state the need to have regard to other National Policy Statements, e.g. Freshwater and Coastal Management in the short, medium and long term;*
- *The NPS document should have a review period to measure effectiveness;*
- *Auckland Council submission should note that this approach of a policy statement will not address the impacts on housing provision of a lack of central government direction of:*
 1. *how infrastructure will be funded,*
 2. *limiting impact of overseas purchasing,*
 3. *limiting property investment for short term financial gains,*
 4. *addressing materials shortages and prices,*
 5. *planning for the skilled work force to do the construction, and*

that Auckland Council looks forward to Central Government adequately addressing these issues.

Sincerely,



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Chair Whau Local Board**

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