



National Policy Statement on Urban Development Capacity

Report on section 46(a) consultation submissions

12 April 2016

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Executive summary

In accordance with section 46(a) of the Resource Management Act 1991 (RMA), consultation on the proposed National Policy Statement on Urban Development Capacity (NPS-UDC) took place between 3 December 2015 and 5 February 2016. Two-hundred-and-sixty consultation letters were sent to all iwi authorities, all local authorities and selected stakeholders. Forty-seven submissions were received, and more than 79 per cent (37) indicate some level of support for an NPS-UDC.

Out of the 47 submissions received: 6 were from regional councils, 6 were from city councils and 14 were from district councils. Eight were from industry groups and 5 were from businesses; 2 were from infrastructure providers, one was from a professional body and 1 was from an iwi authority. Three additional submissions were provided by a trust, an education provider and a regional health service.

Of the submissions from local authorities, 11 were from those councils experiencing the highest population growth, such as Auckland, Tauranga and Christchurch; however, no submissions were received from Queenstown, Waipa or New Plymouth (which are also experiencing high growth). Fourteen were from councils with lower growth including rural areas such as Rangitikei, Clutha and Timaru.

The main reason submitters gave for supporting an NPS-UDC was that direction at a national level will ensure local authorities have greater certainty, consistency and clarity for managing growth and pressures from urban development. An NPS was seen by submitters as helping local authorities plan for growth and to change their plan-making processes. Some submitters supported an NPS-UDC if it only applied to areas where urban development was an issue. It was suggested that the NPS should apply to high growth, urban areas rather than impacting on small, rural authorities.

Support from submitters was based on the view that an NPS-UDC would:

- support better integrated planning strategies
- ensure business activity can operate efficiently and effectively in urban environments
- enable cities and high growth areas to develop quality built environments
- provide the national direction that was always intended in the RMA to support decision-makers.

A number of submitters expressed support that was conditional on a better understanding of the proposed NPS-UDC. Some felt it should only cover a broad scope including:

- direction on urban form particularly on encouraging more intensification
- better integration of planning including the provision and funding of infrastructure
- direction on the management of natural resources.

Only three submissions did not support the development of the proposed NPS-UDC. These submitters considered that an NPS-UDC would not help local authorities planning for growth because it would not address the problem. They also felt that sufficient tools are already in place to manage growth.

Feedback was sought on the challenges planning for growth brought and that an NPS-UDC and supporting guidance could help to address. Common themes included:

- planning for urban development that incorporates good urban design and amenity value (55 per cent)¹

¹ Per cent of total submissions.

- coordinating the release of development capacity in resource management plans and the funding and provision of infrastructure to support that (53 per cent)
- managing the balance between greenfield development and brownfield intensification, with brownfield development seen as desirable for a range of reasons but difficult to enable (51 per cent)
- promoting coordination between the release of development capacity and the funding and provision of infrastructure to ensure an integrated planning approach (50 per cent)
- ensuring a strategic approach to urban development including the balance between residential and business land (43 per cent)
- managing reverse sensitivity (43 per cent)
- ensuring accurate estimates of the demand and supply of development capacity (38 per cent)
- ensuring that impacts of urban development on natural resources, such as freshwater, soil and rural areas, are well managed (32 per cent)
- encouraging collaboration between local authorities so that they take a regional approach to addressing growth (30 per cent).

Submitters were asked what an NPS-UDC and supporting guidance could contain.

Suggestions include:

- aligning the NPS-UDC with legislation (Local Government Act 2002 (LGA) and Land Transport Management Act 2003 (LTMA) and other NPSs (51 per cent)
- common definitions and data sources for estimating supply and demand (49 per cent)
- considering a contextual rather than a one-size-fits-all approach to different areas of the country to address issues of urban development (27 per cent)
- requiring local authorities to provide certain amounts of development capacity (25 per cent)
- monitoring requirements that link to clear definitions (19 per cent)
- considering and aligning with Treaty of Waitangi settlements (9 per cent).

Overall, the feedback has been supportive of an NPS-UDC with a strong interest in further informal engagement on the scope and direction.

1 Introduction

The Resource Management Act 1991 (RMA) requires two phases of consultation in the development of a proposed national policy statement (NPS). The first phase is section 46(a) targeted consultation that seeks and considers comments from selected stakeholders on the proposed National Policy Statement on Urban Development Capacity (NPS-UDC). Targeted consultation on the proposed NPS-UDC took place between 3 December 2015 and 5 February 2016. Two-hundred-and-sixty consultation letters were sent to all iwi authorities, all local authorities and selected stakeholders. Forty-seven submissions were received, which is an 18 per cent response rate; 37 of these submissions indicated support for the proposed NPS-UDC, which was 79 per cent support for the proposed NPS-UDC.

1.1 Purpose of this document

This document summarises the views expressed in the 47 submissions received through the section 46(a) consultation on the possible scope of an NPS-UDC. It does not attempt to analyse these views or provide any recommendations in response to the points raised as this will form part of the report back to government in 2016. For a list of submitters, please see appendix 2. This report summarises the feedback received following the section 46(a) consultation to contribute to the drafting of the proposed NPS-UDC. It records themes emerging from the consultation so that submitters' feedback can be taken into account as the scope and options for a proposed NPS-UDC are developed. For the list of questions posed, refer to appendix 1.

1.2 Methodology

Submissions were received, recorded and entered into a submissions database tool. All of the submissions were read and themed against a framework. The submissions tool then grouped submission material and provided statistics on how many and what submissions mentioned particular themes.

2 Submissions overview

Forty-seven submissions were received. Table 1 gives a breakdown of the submissions by organisation type and level of support for an NPS-UDC by organisation type. Most submitters (79%) supported the development of an NPS-UDC on Urban Development.

Table 1: Number and percentage of submitters by organisation type including level of support for a national policy statement (NPS) on urban development

	Support	Not stated	Do not support	Total	Percent of overall responses
Regional council	3	2	1	6	12
City council	6	0	0	6	12
District council	10	2	2	14	30
Resource management professional body	1	0	0	1	2
Council-Controlled Organisation	1	1	0	2	4
Infrastructure provider	2	0	0	2	4
Industry group	8	0	0	8	17
Business	3	2	0	5	11
Iwi authority	1	0	0	1	2
Other	2	0	0	2	6
Total	37	7	3	47	
Overall position on NPS	79%	15%	6%		100

Of the submissions from local authorities, 11 were from those councils experiencing the highest population growth, such as Auckland, Tauranga and Christchurch; however, no submissions were received from Queenstown, Waipa or New Plymouth which are also experiencing high growth. Fourteen were from councils with lower growth including rural areas such as Rangitikei, Clutha and Timaru.

3 Levels of support for developing a National Policy Statement on Urban Development Capacity

While 79 per cent of submitters support the development of a proposed NPS-UDC, just over half indicate conditional support, for a range of reasons. These reasons are outlined below. Three submitters do not support an NPS-UDC, and these views are also summarised below.

3.1 Reasons for supporting a National Policy Statement on Urban Development Capacity

A variety of reasons were given by submitters in support of the development of an NPS-UDC.

1. The main reason for supporting an NPS-UDC is that direction at a national level will give local authorities greater certainty, consistency and clarity for managing growth and pressures from urban development (17, 14, 21, 22, and 45)² and this will help local authorities plan for growth, change and urban issues in their plan-making processes (47). This includes direction that expedites development-ready land supply for both residential and commercial activities (41).
2. Some submitters consider an NPS-UDC will support “integrated planning strategies for urban development” (21). One submitter indicated that business also supports this concept as it would help ensure business activity can operate efficiently and effectively in urban environments (39).
3. Two submitters support the NPS-UDC as it will support urban environments and high growth areas “develop quality built environments that are economically and environmentally sustainable” (14, 23).
4. Another reason for supporting the NPS-UP is the view that the RMA has always intended to support decision-makers by developing NPSs that emphasise matters of national importance and provide strategic direction (47).

3.2 Conditional support

Some submitters gave conditional support subject to more detail on the scope and content of an NPS-UDC. For this report, conditional support was defined as submitters who saw benefit in aspects of an NPS-UDC. Local authorities were the largest group, indicating conditional support for an NPS-UDC, with 14 of the 26 councils in this group. Most industry groups also expressed conditional support for the NPS-UDC. The main reasons submitters indicate conditional support rather than full support for an NPS-UDC are outlined below.

1. **Limited application of NPS-UDC to high growth areas:** Some submitters supported an NPS-UDC if it only applied to areas where urban development was an issue. It was suggested that the NPS apply to high growth, urban areas rather than impacting on small, rural authorities (4, 8, 12).
2. **Broader scope:** A range of submitters believed an NPS would have value if it had a broader scope (13, 16, 47). For example, Auckland Council suggested that an NPS-UDC that “focuses only on capacity supply of land for residential and business development is possibly too narrow, responding to an important but immediate issue” (42). Some submitters suggested that an NPS-UDC would achieve better, more sustainable outcomes if it addressed urban development issues with a wider and more integrated approach (11, 37).
3. **Urban form:** A number of submitters indicated that they would support an NPS-UDC if it also addressed urban form. One submission stated that an NPS-UDC that only focused on “issues of development capacity (and particularly greenfield development

² Submitter reference number – refer to appendix 2 for list.

capacity) would be a lost opportunity to advance the planning environment in one of the more taxing issues facing urban areas today” (16). This view was repeated by several stakeholders who supported an NPS-UDC that provides direction and support for brownfield development (10, 21, 27, 32, 36). The reasons for this emphasis were related to infrastructure as a “singular focus on supply leading to significant peripheral expansion could further exacerbate the infrastructure and growth issues” (42). There was also concern that an ‘enabling’ NPS-UDC may inadvertently build in urban sprawl as an implicit policy driver, resulting in a range of unintended consequences (14).

4. **Better integration with infrastructure:** More than half of submitters indicated conditional support for an NPS-UDC if it took into account integrated planning and the provision, funding or planning infrastructure to “create better outcomes for all stakeholders” (3, 5, 7, 20, 21, 25, 30, 42, 44). It was highlighted that “integrating infrastructure provision and sequencing with land development is critical for both intensification and greenfield development” (40). Another submitter raised the concern that an NPS-UDC that “increases land supply to promote housing has the potential to create very real tensions with established significant infrastructure” (33). The iwi authority indicated the need to allow iwi to engage in the development of urban infrastructure (44).
5. **Environmental protection:** Some submitters also see an NPS-UDC as an opportunity to ensure that urban environments manage and plan for the protection of particular resources, such as versatile soils and water bodies, within urban centres and rural production systems (3, 11, 32, 35, 43, 44). One submitter offered suggestions on an NPS-UDC scope that includes direction for urban environments on quality and good urban design (29).

3.3 Submissions that did not state a position on the National Policy Statement on Urban Development Capacity

Nearly 15 per cent of submissions did not state a clear position on the NPS-UDC despite many of these submissions discussing what a possible NPS-UDC could include.

3.4 Reasons for not supporting a National Policy Statement on Urban Development Capacity

Only three submissions did not support the development of a proposed NPS-UDC. These three submitters did not believe an NPS-UDC could assist local authorities with planning for growth because it would either not address the problem or was unnecessary for the relatively few cases where planning for high levels of urban growth is a problem (6, 46). These submitters believe that sufficient tools are already in place to manage growth (5, 6) and an NPS-UDC could complicate this, potentially unravelling good work already taking place.

4 Challenges with planning for growth and how a National Policy Statement on Urban Development Capacity could address these challenges

The section 46(a) consultation letter asked submitters about challenges they have with planning for growth. The letter also asked how an NPS-UDC and supporting guidance could help to address these challenges. There are parallels between the challenges submitters face and how an NPS-UDC can address these challenges. These are both themed in table 2 below.

Table 2: Challenges with planning for growth

Challenges with planning for growth	How can an NPS-UDC and supporting guidance address these challenges
<p>Planning for sufficient business and residential land can be a challenge for both local authorities and business groups. This includes a mix of residential, retail, commercial and industrial land (10, 14, 17, 22, 23, 31, 33, 43, 45). The allocation of business land is often neglected (18).</p> <p>Managing reverse sensitivity. Another related challenge, noted mostly by business and industry groups, was the management of reverse sensitivity (31, 35, 34, 38, 32). Reverse sensitivity issues arise when residential land displaces business land or rural land and business–rural activities are “not always compatible with the expectations of residential property owners” (43). These impacts have the potential to affect the ongoing operation of certain business activity (24, 33).</p>	<p>Ensuring a strategic approach to urban development that balances residential and business land and the need for different types of business land. This was mentioned by 43 per cent of submissions, including by 44 per cent of local authorities. Many submitters believe the proposed NPS-UDC could provide strong direction and acknowledgement on competing land uses and provide sufficient development capacity for both residential and business land (1, 3, 11, 14, 22, 25, 31, 33, 36, 37, 43, 45).</p> <p>The NPS-UDC should recognise the various market factors that influence the distribution of diverse business activities (13, 16). It should also ensure that development capacity differentiates between ‘land’ and ‘space’ as businesses require usable built space for business activities as well as land capacity (39, 42). This approach will create an “integrated process which includes all elements that make a successful, liveable city” (13).</p>
<p>Managing brownfield and greenfield development to achieve cost-effectiveness and land efficiencies (18, 31). Some submitters have challenges with providing greenfield development because they seek to protect rural land (17, 32) or not incur the additional costs that peripheral greenfield growth incurs (16, 43, 45). This includes managing privately initiated land development (especially through private plan changes) in locations where the council has not planned for and cannot afford additional network infrastructure (3, 10, 16, 40). The result is ad hoc and fragmented development. Land banking has also created issues for local authorities that are restricted in providing increased development capacity (16).</p>	<p>Just over 50 per cent of the submissions thought an NPS-UDC could manage or provide direction on the balance between greenfield development and brownfield intensification (31, 35, 43). Several submitters indicated support for more direction on intensification, so a compact city form could be achieved and the benefits that go along with it (10, 13, 14, 17, 18, 19, 21, 23, 27, 30, 32, 34, 36, 42). Auckland Council supported more direction on intensification believing “there is a very real risk that a singular focus on supply leading to significant peripheral expansion could further exacerbate the infrastructure and growth issues” (42).</p>
<p>Planning for infrastructure including both the provision and funding of infrastructure. This was mentioned as a challenge by 68 per cent of local authorities. Challenges included:</p> <p>a. insufficient infrastructure and the need to align development capacity planning with</p>	<p>More than 50 per cent of submitters thought an NPS-UDC should promote coordination between the release of development capacity and the funding and provision of infrastructure to ensure an integrated planning approach (3, 5, 7, 13, 14, 16, 17, 20, 21, 25, 27, 32, 37, 40, 41, 42, 45, 47). This includes protection of</p>

Challenges with planning for growth	How can an NPS-UDC and supporting guidance address these challenges
<p>the provision of appropriate infrastructure (3, 13, 15, 22, 39, 41, 47). New Zealand Council for Infrastructure Development notes that “not enough land serviced with infrastructure and zoned for new housing has been made available to ensure the development sector can deliver enough housing supply to meet demand”(41)</p> <p>b. the lack of integration in the land use planning system including under the RMA, LGA and LTMA, which can take too long to deliver crucial infrastructure (22, 44)</p> <p>c. Predicting the “forecasted growth and the need to co-ordinate land development with provision” (18). Infrastructure providers have to balance the maintenance and upgrading of current infrastructure capacity with the need to provide for new infrastructure (18, 30)</p> <p>d. funding of infrastructure to support and enable growth can be a challenge as much of the key infrastructure cannot be staged (5, 20, 30, 42, 43, 45). These concerns are exacerbated when the provision of infrastructure falls on local authorities, developers and existing ratepayers causing “growth and development to be a cost to councils much more than an opportunity” (20, 36, 41,46). Future urban growth is dependent on adequate infrastructure financing and delivery (32, 45)</p> <p>e. rural and low growth local authorities highlighted that uneven growth and decline creates significant issues for local authorities in managing and planning for services and infrastructure (2, 8, 12, 14, 19, 31, 34).</p>	<p>nationally significant infrastructure such as the national grid (24, 38). It was also suggested that the NPS-UDC could encourage and provide guidance to local authorities to develop spatial plans including at a regional level (13, 22, 42, 43). The NPS-UDC could also include provisions for iwi to engage in the development of urban infrastructure (44).</p> <p>Many submitters also believed an NPS-UDC could address infrastructure funding, provide funding strategies and clarify where the costs of infrastructure provision sit (19, 20). Auckland Transport suggests that the NPS-UDC could “direct councils to identify and plan for a specific quantum of land or development capacity to be released for development, within an agreed funding model” (18). This would ensure that the NPS-UDC does not impose unaffordable fiscal requirements on councils (11). It was recommended that an NPS-UDC should encourage the exploration of localised infrastructure solutions (28).</p>
<p>Sustainably managing urban growth and natural resources is a challenge when planning for growth (3, 11, 14, 18, 34, 47). The importance of versatile soils was mentioned by a number of submitters (14, 31, 32, 43). New Zealand Planning Institute notes that in “some regions rural land plays a more important role in agriculture and horticultural production and economic activity than in others” (13).</p> <p>Geographical constraints and hazards are another challenge when planning for sustainable urban development and resilience. Development limitations include high landscape values and topography (16). It can also be difficult to manage the conflicts between demand for growth and the effects of natural hazards such as flooding, earthquakes and tsunamis (3, 11, 13, 17, 25, 27, 47). This includes planning for climate change and coastal erosion (43).</p>	<p>Ensuring that particular resources and land areas, such as water, air quality, biodiversity, coastal or riparian zones, rural production systems and high class soils areas, are well managed as urban growth occurs was another consideration for the NPS-UDC to address. This was raised by 32 per cent of submitters. Some submitters stated that an NPS-UDC could include recognition of these resources (11, 25, 30, 43, 45). Te Rūnanga o Ngāi Tahu suggests an NPS-UDC needs to include provisions that will result in the improved quality of water bodies within urban centres and protection of the environment from the impacts of urban development through increased pressure on vulnerable ecological and environmental systems (44). This includes the need to ensure that the resources and production systems that underpin working rural land are protected maintained and improved (14, 32, 35). Te Rūnanga o Ngāi Tahu says the</p>

Challenges with planning for growth	How can an NPS-UDC and supporting guidance address these challenges
	NPS-UDC “should be developed in a manner consistent with the values of Te Rūnanga, especially kaitiakitanga (stewardship) and tikanga”.
<p>Ensuring that urban design and amenity value are maintained when planning for growth and intensifying was mentioned by a number of submitters (3, 11, 29, 34).</p>	<p>Over 50 per cent of submitters mentioned that an NPS-UDC needs to include recognition of and planning for a broader range of urban matters that are essential aspects of quality urban environments. This included recognition of urban design, amenity value, urban form, landscape character, historic heritage, cultural values and sites of significance to tangata whenua (3, 7, 8, 13, 14, 6, 17, 19, 27, 31, 36, 43, 47). Ngā Aho Inc recommends that an NPS-UDC “needs to recognise the diverse values of mana whenua in the shaping of our cities” (37). Submitters also suggested that an NPS-UDC incorporates the Urban Design Protocol (4, 6).</p>
<p>Local authorities have difficulty accurately assessing development capacity. As one submitter highlighted “it is almost impossible to accurately forecast population growth at the local community level” (20). Growth can also vary greatly across regions (14). These forecasts can change rapidly as a result of events, for example, such as the Christchurch earthquakes (44). The result of these factors is that some “local growth plans prepared historically by councils in high growth areas to meet anticipated demands are no longer adequate” (41). While planning for urban growth is a challenge so is planning for the different kinds of urban housing that are in demand (3, 13, 14, 15).</p>	<p>At least a third of submitters thought an assessment of demand for development capacity would be useful in an NPS-UDC and supporting guidance. Some local authorities have used a range of different methods to measure capacity and predict growth (17). However, an ‘accepted’ methodology could provide greater consistency and robustness in determining the demand and supply of residential and business in urban areas (3, 7, 11, 12, 14, 15, 19, 20, 21, 22, 31, 42, 43).</p>
<p>Housing markets and growth do not recognise regional and territorial boundaries. Populations are increasingly mobile – with people living in one district and commuting to a neighbouring district (5, 11, 16, 20, 47).</p>	<p>Encouraging collaboration between local authorities for a regional approach to addressing growth was mentioned by 30 per cent of submitters. Submitters believe an NPS-UDC could direct adjoining councils to work together to deliver sufficient development capacity (11, 21). Tauranga City Council suggested that this could occur in “specific locations where individual councils were able to demonstrate that they had insufficient land and feasible development capacity available to accommodate projected population and urban growth rates” (11). Submitters suggested an NPS-UDC could acknowledge that local authority boundaries are “arbitrary and a NPS-UDC should encourage or require a regional/sub-regional approach to addressing growth” (16, 47). For example, where the market for both residential and business land is a regional one with various areas servicing different demand drivers and where urban growth issues such as infrastructure expand beyond existing political boundaries (16, 22, 30, 37, 44, 45).</p>

5 What should be included in a National Policy Statement on Urban Development Capacity?

Submitters were asked what an NPS-UDC and supporting guidance could contain.

1. Almost half of all submitters indicated that an NPS-UDC could establish common definitions and data collection for estimating supply and demand. Advantages include:
 - a. providing common terminology and clear definitions to ensure effectiveness (30). For example, definitions of: demand; supply; 'provides for'; business zoned; zoned; zoned and serviced; horizon 'long term', serviced and consented; shovel ready, commercially feasible or plan enabled; affordable housing (3, 11, 13, 15, 16, 18, 19, 22, 28, 30, 37, 39, 40, 42, 43, 47). Auckland Council pointed out that development capacity has to differentiate between 'land' and 'space' (42)
 - b. common and/or centralising data (14, 19, 20, 40)
 - c. further clarifying the role of regional councils and local councils with respect to growth planning and urban development (18). An NPS-UDC could also help clarify how national, regional and local interests should interact (22) and create alignment of goals at national, regional and local levels as well as consistent interpretation (44)
 - d. defining 'no go' areas and providing security that they will not be affected by unplanned, opportunistic and sporadic development (32).
2. About half of the submissions received mentioned that the NPS-UDC must align with legislation other than the NPS and Treaty of Waitangi settlements (51 per cent). This includes:
 - a. providing better linkages between the RMA, LGA and LTMA (14 21, 22, 23, 27, 30, 42, 47). Functions are administered under three statutes with differing timeframes, priorities and funding streams (18). For example, there needs to be a connection between district plan zoning and the LGA, Long-term Plan and 30-year infrastructure strategies, asset management plans, land use or growth strategies and provision of infrastructure to ensure that rezoned land is 'development ready' (10)
 - b. the NPS-UDC must address and acknowledge the Treaty of Waitangi and could provide supporting guidance on the approach taken by territorial authorities with regard to Māori interests and Treaty of Waitangi settlements (42, 44). For example, legislation applies to specific areas such as the Waikato–Tainui Raupatu Claims (Waikato River) Settlement Act 2010 (14)
 - c. the scope of the NPS-UDC should be complementary to existing NPSs including the NPS for Freshwater Management, the NPS on Electricity Transmission and the New Zealand Coastal Policy Statement (15, 24, 36, 38, 42, 44, 47)
 - d. the relationship between the proposed National Planning Template will need to be carefully considered (15).
3. Some submitters believe that if local authorities have assessed the demand of development capacity they should be required to provide for this demand. Some submissions support the idea of using the United Kingdom method where local authorities are required to implement staged plans that track how much land is available for development in the upcoming 5 and 15 years (18, 27, 42). Some submitters thought the NPS-UDC could ensure the provision of at least 10 years adequate business and residential land supply to be periodically reviewed (3, 21, 23, 25, and 28).

4. A third of submitters noted that an NPS-UDC should consider a contextual rather than one-size-fits-all approach to different areas of the country to address issues of urban development. The consistency that an NPS gives will need to be balanced against the different urban environments of the various local authorities (1, 13, 16, 17, 43). It was noted that the NPS-UDC should be outcome-focused and not overly prescriptive, to enable every local authority to work with its community to determine how that direction would be applied (11, 12, and 45). On the other hand, only the Property Council was concerned that 'a broad brush' NPS may be ignored (22).
5. An NPS-UDC and guidance containing monitoring requirements was mentioned by 20 per cent of submitters. It was noted that definitions should link to monitoring and give a clear understanding of supply (11, 13, 16, 20, 21, 22, 34, 42).

Appendix 1: Section 46(a) consultation letter



3 December 2015

Aorangi Māori Trust Board

Tēnā koe,

Consultation on a National Policy Statement on Urban Development Capacity

In August this year, the Minister for the Environment signalled the Government's priorities for national direction under the Resource Management Act 1991 (RMA) in *A way forward for national direction*. The Ministry for the Environment will be consulting on a number of aspects of this programme from now through to 2017.

One of the priorities signalled through *A way forward for national direction* was a National Policy Statement on Urban Development Capacity. The Ministry for the Environment and the Ministry of Business, Innovation and Employment would like your feedback to inform the development of this National Policy Statement.

Some urban areas in New Zealand are growing quickly, and are under intense pressure to enable sufficient development-ready land for housing and business to keep pace with demand. This can make it difficult for regional and district councils to balance competing priorities to make appropriate decisions that accommodate urban growth. This is an important factor behind the increasing land and house prices being experienced in some parts of the country.

To support productive and well-functioning cities, it is important that regional policy statements and regional and district plans under the RMA provide adequate opportunities to develop land for business and housing. To assist with this, the Minister for the Environment is considering the development of a National Policy Statement on Urban Development Capacity.

A National Policy Statement could provide local authorities with guidance on how to assess demand for residential and business development capacity, and then respond to this through more effective urban planning.

What are your thoughts on a National Policy Statement on Urban Development Capacity?

To inform the development of a proposed National Policy Statement on Urban Development Capacity, we would like your thoughts and feedback on the following questions:

1. Is your area experiencing high levels of population growth and challenges in planning for this growth?
2. How could a National Policy Statement and supporting guidance help to address these issues?
3. What could a National Policy Statement and supporting guidance contain?

Please send your comments by **Friday, 5 February 2016**:

- by email: to npsurbandevelopment@mfe.govt.nz or
- by post: attention, the Urban Environment Team, Ministry for the Environment, PO Box 106483, Auckland.

What are the next steps?

The Minister for the Environment will consider your feedback and, depending on the outcome of this, there will be further consultation on what a draft National Policy Statement will involve. This next consultation phase would start in 2016, and we will keep you informed along the way.

We look forward to your feedback. If you have any further questions about this programme of work, please email npsurbandevelopment@mfe.govt.nz or visit www.mfe.govt.nz/rma.

Nāku noa, nā,



Amanda Moran

Acting Director, Resource Management System, Ministry for the Environment



Di Anorpong

Manager, Housing Policy Development, Ministry of Business, Innovation and Employment

Appendix 2: List of submitters

Submitter number	Organisation
1	Waimakariri District Council
2	Whanganui District Council
3	Timaru District Council
4	Waitaki District Council
5	Western Bay of Plenty District Council
6	Clutha District Council
7	Waikato District Council
8	Rangitikei District Council
9	Whakatane District Council
10	Palmerston North City Council
11	Tauranga City Council
12	Northland Regional Council
13	New Zealand Planning Institute
14	Waikato Regional Council
15	Retirement Villages Association
16	Wellington City Council
17	Whangarei District Council
18	Auckland Transport
19	Environment Canterbury
20	Bay of Plenty Regional Council
21	Christchurch City Council
22	Property Council
23	Council of Shopping Councils
24	Transpower NZ Ltd
25	Otago Regional Council
26	Rockgas Ltd – Contact Energy Ltd
27	Auckland Regional Public Health Service
28	Todd Property Group Limited
29	Urban Design Forum
30	Wellington Water
31	Far North District Council
32	Horticulture New Zealand
33	NZ Airports Association
34	Environment Southland
35	Federated Farmers of New Zealand (Auckland Province) Incorporated
36	Unitec Institute of Technology
37	Ngā Aho Inc
38	Genesis Energy
39	Progressive Enterprises Limited
40	Selwyn District Council
41	New Zealand Council for Infrastructure Development
42	Auckland Council
43	Hastings District Council
44	Te Rūnanga o Ngāi Tahu
45	Hamilton City Council
46	Wellington Civic Trust
47	Local Government New Zealand