



SUBMISSION TO THE PRODUCTIVITY COMMISSION ON THE DRAFT REPORT ON BETTER URBAN PLANNING

1. EXECUTIVE SUMMARY

- 1.1 Goodman (NZ) Limited, a subsidiary of the ASX listed Goodman Group ("**Goodman**"), welcomes the opportunity to comment on the Productivity Commission's Draft Report on Better Urban Planning.
- 1.2 Goodman is the manager of Goodman Property Trust ("**GMT**"), New Zealand's leading industrial and business space provider and one of the NZX's largest listed property entities, with property assets of over \$2.3 billion. GMT's portfolio includes industrial estates, warehouse and distribution centres, business parks, and office parks.
- 1.3 Goodman has extensive experience with New Zealand's planning system. In its opinion, the major constraints on residential and business development in New Zealand are not found in the Resource Management Act 1991 ("**RMA**") and the various planning documents underneath it, but rather are in relation to:
- (a) the provision and funding of infrastructure;
 - (b) council capabilities in implementing environmental legislation and planning documents; and
 - (c) other factors outside the planning sector, including the banking sector's reluctance to invest in development projects and the capacity of New Zealand's construction industry to meet demand.
- 1.4 For further details on Goodman and the issues it faces in participating in the planning framework in New Zealand, please see the **attached** submission Goodman has recently made on the Proposed National Policy Statement on Urban Development Capacity ("**NPS-UDC**").

2. GOODMAN'S INTERACTION WITH PLANNING PROCESSES UNDER THE RMA

- 2.1 Goodman is largely satisfied with how the current planning processes under the RMA are functioning.
- 2.2 When looking to develop or redevelop land, Goodman engages with the relevant council early on and throughout a project to discuss its plans. Goodman aims to file high quality applications with councils. In Goodman's experience, this approach has largely resulted in limited uncertainty as to the efficient processing of consents and plan changes.
- 2.3 Goodman also considers that the current notification provisions introduced in the 2009 amendments are operating effectively and offer appropriate checks on applications, while not being overly constraining on the processing of an application. We do not consider that notification provisions of the RMA should be amended.
- 2.4 In Goodman's view, the Commission needs to be cautious about making substantial changes to the RMA such as separating the built and natural environment into two separate acts.

3. THE KEY CONSTRAINTS ON DEVELOPMENT

Provision and funding of infrastructure

- 3.1 Lack of serviced land is a common obstacle for the development of business and industrial land. One of the major constraints to development for Goodman is the provision and funding of infrastructure.
- 3.2 Goodman is currently engaged in significant development projects that would ultimately unlock large areas of future development land. However, progress on funding agreements between local authorities, developers and local infrastructure providers around the services required is not integrated, and is disjointed and slow. The end result is often uncertainty in relation to both cost and timing outcomes.¹
- 3.3 Recommendation 9.1 of the Commission states:²
- Spatial plans should be a standard and mandatory part of the planning hierarchy in a future system. Spatial plans should be tightly defined and focus on issues closely related to land use, in particular the provision of water and transport infrastructure and community facilities (eg, green space, reserves, conservation areas, and libraries), protection of high value ecological sites, and natural hazard management.
- 3.4 Goodman considers that there is merit in making spatial plans a mandatory part of the planning hierarchy. Taking such an approach encourages central government, councils, infrastructure providers, and key stakeholders to collaborate early on to consider how future growth will occur and will provide much needed certainty to the business sector that investment in growth will be supported by adequate infrastructure.
- 3.5 In order for mandatory spatial planning to be effective, local authorities will need clear direction from central government as to how collaboration on the spatial plans should take place in order to deliver coordinated land use planning and infrastructure provision. Without this clear direction, mandatory spatial planning will struggle to provide any real benefits, or could take years to resolve.
- 3.6 Goodman also agrees with the Commission's finding that "[f]inancial, legislative and political barriers are limiting the ability of local authorities to efficiently recover the costs of infrastructure."³
- 3.7 In response to question 10.3 of the Draft Report, Goodman considers that alternative funding systems for local authorities would improve the ability to provide infrastructure to accommodate growth. Councils need to take on responsibility for funding infrastructure. Providing councils with alternative funding systems will give further flexibility to councils in delivering much needed infrastructure.
- 3.8 As detailed in Goodman's submission on the NPS-UDC,⁴ while land identified for potential development may not currently be serviced by infrastructure, there may be situations where a developer is prepared to fund or construct the infrastructure in order to bring the development of that land forward. Any future reform to the way infrastructure is funded needs to be flexible enough to allow such options to be taken into account when local authorities and infrastructure providers are considering land to develop.

¹ Goodman's submission on the NPS-UDC, pages 2 and 3.

² Draft Report, page 236, R9.1.

³ Draft Report, page 256, F10.3.

⁴ Goodman's submission on the NPS-UDC, page 7.

- 3.9 The planning system in New Zealand needs to provide a wide range of effective funding mechanisms for infrastructure so there are various options available to local authorities, central government and developers to fund necessary infrastructure projects and allow for future growth.

Council capabilities

- 3.10 Coordination between councils and other stakeholders is a key constraint on development. One of the main contributors to this issue is some councils' inability or unwillingness to productively engage with central government, infrastructure providers and key stakeholders to effectively process applications under the RMA.
- 3.11 Greater central government intervention will be a fundamental mechanism in increasing council capabilities.
- 3.12 The establishment of a centre of excellence or resource that councils could draw on to conduct real-options analysis in the development of land use plans⁵ is an example of one of the actions that central government could take in order to improve council capabilities.
- 3.13 Legislative intervention may also be beneficial. The special housing area legislation is an example of clear, timely central government direction that goes a long way in stimulating growth. The targeted and clear direction from central government through that legislation (with specified timeframes for action), encouraged councils to focus attention on the housing problem and expeditiously enable residential growth.
- 3.14 Given the success of the special housing area legislation and process, we consider that there is room to use the existing RMA structures for a similar style of legislation as a means of fast tracking significant projects (eg to enable infrastructure, major regional projects, etc). Such targeted legislation could be structured to ensure it is only used in limited circumstances by setting a reasonably high threshold for its use.
- 3.15 Another useful tool that Goodman supports is the call in powers currently available to the Minister under Part 6AA of the RMA, which enable proposals of national significance to be referred to a board of inquiry or directly to the Environment Court.
- 3.16 Central government intervention such as the special housing area legislation and the ministerial call in powers have a proven track record of speeding up the processing of applications and allowing significant issues to be dealt with robustly. When a council's actions are not resulting in sufficient development capacity for residential and business land, central government should have some powers to be able to step in and promote action to resolve the significant issue.
- 3.17 Providing greater guidance and direction would also assist with addressing scenarios where certain officers within councils can have significant sway over which developments gain consent. In Goodman's experience, one or two council officers who have their own often unsubstantiated and subjective views on an aspect of a project can unreasonably hinder the processing of an application and even stop a development gaining consent altogether.
- 3.18 The planning system should not be vulnerable to the actions of one or two individuals with particular agendas and limited evidence support their opinions. Providing the ability for central government intervention will act as a further check on councils to ensure consents are being processed in a fair and reasonable way.

⁵ Draft Report, page 238, R9.2.

Other factors to consider

- 3.19 While potentially outside the scope of the Commission's inquiry into better urban planning, Goodman also wishes to bring to the attention of the Commission other key constraints that we see are restricting growth and development.
- 3.20 The banking sector's reluctance to invest in development projects has been a major factor in constraining development. As detailed recently in the *New Zealand Herald*⁶, there is a fear amongst developers that a sudden tightening of bank lending may "throttle" new housing projects despite the city's desperate housing shortage.
- 3.21 Even if sufficient land is allocated for development, and planning processes are simplified and streamlined further, if the funding is not there to fund the development and if banks are not willing to take the necessary risks of investment, the development will simply not occur.
- 3.22 Another key constraint on development has been the capacity of the New Zealand's construction industry to be able to meet demand for residential and business growth and maintain high standards of construction.
- 3.23 Recent issues in the construction industry, such as steel sourced from China failing strength tests, indicate the increasing pressure on the construction industry to meet demand that, if not addressed, could result in major structural deficiencies in the buildings and infrastructure built. This has the potential to further inhibit growth.
- 3.24 Solutions to the problems discussed in the Draft Report will not come from changing New Zealand's planning system. The Government must be aware of other factors constraining development and actively seek to address these issues alongside any reform in the planning sphere.

4. MOVING FORWARD

- 4.1 Goodman would be open to meeting with the Commission should the Commission wish to investigate the issues discussed above further.

GOODMAN (NZ) LIMITED:



Signature:

John Dakin

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Goodman New Zealand

Date: 3 October 2016

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Collins, S "Tighter bank loans may throttle housing", *New Zealand Herald* 3 September 2016.



SUBMISSION TO THE MINISTRY FOR THE ENVIRONMENT ON THE PROPOSED NATIONAL POLICY STATEMENT ON URBAN DEVELOPMENT CAPACITY

1. EXECUTIVE SUMMARY

- 1.1 Goodman (NZ) Limited, a subsidiary of the ASX listed Goodman Group ("**Goodman**") welcomes the opportunity to comment on the Proposed National Policy Statement on Urban Development Capacity ("**NPS**").
- 1.2 Goodman supports the general thrust of the NPS, which is to ensure councils provide sufficient residential and business development capacity to meet demand, and endorses the Government's drive to unlock land supply.
- 1.3 However, we do not consider that the NPS is sufficiently directive to ensure that councils will provide much needed development capacity, particularly in relation to business land. We are concerned that, even with the NPS in place, councils (in high growth areas in particular) could either say they have sufficient "business land" capacity when in fact that land is not suitable for development, or could argue that certain land should not be made available for development because the infrastructure is not in place. The NPS does not require councils to ensure land is serviced.
- 1.4 We think that several of the draft policies in the NPS do not give sufficient recognition to the need for business land in the same way they do for residential land, and that the very real differences between different types of "business" land (eg industrial, commercial, retail, office park, etc) are not adequately recognised in the policies.
- 1.5 Finally, it is critical that councils be clearly directed to consult with key stakeholders when carrying out their required land assessments. The availability of land - and its ability to be developed - is complex and subject to a range of drivers, many of which cannot be easily ascertained by a simple desk top study or by consultation between local authorities and local/central government infrastructure providers.

2. WHO WE ARE

- 2.1 Goodman is the manager of Goodman Property Trust ("**GMT**"), New Zealand's leading industrial and business space provider and one of the NZX's largest listed property entities, with property assets of over \$2.3 billion. GMT's portfolio includes industrial estates, warehouse and distribution centres, business parks, and office parks.
- 2.2 Goodman Group, the ultimate manager of GMT, is a global investor, developer and fund manager with over \$33 billion total assets under management worldwide.
- 2.3 Regional and district planning frameworks often do not properly recognise the need for business growth to occur alongside residential growth. Homes are enabled, but the business activities that support them - including industrial, commercial, and business park land - are not. This can lead to consenting challenges for Goodman, despite an obviously growing catchment and a corresponding need for business activities.

3. THE KEY ISSUES

Issue: there is not enough developable business land

3.1 We disagree with the comment in the NPS that "*[i]n most areas and for most types of business, the land available appears to be broadly sufficient and prices do not seem to increase as rapidly as they do with housing. In some urban areas there is even a possibility of oversupply of some kinds of business land.*"¹

3.2 In our experience, developable business land is not always in sufficient capacity - let alone "oversupplied", and councils - even large, well resourced local authorities in high growth areas - often do not understand the constraints on development. As such, they may think they have provided "sufficient" land - but that land is unable to be developed. That may be because, for example, the lot sizes are not big enough, or because the land is not suitable for certain types of business development, or because there has been a failure to plan for and coordinate appropriate infrastructure provision.

Issue: there is a wide range of "business land" needs

3.3 Goodman's Highbrook is a premier business park in Auckland with 33 hectares of remaining development land. This undeveloped land, which under the NPS would be classified as "business land", actually comprises industrial and associated yard areas, hi-tech (non-traditional industrial), commercial office, retail and special purpose land.

3.4 Highbrook has only five industrial lots larger than one hectare left, with the largest being approximately two hectares. When utilising a traditional development feasibility approach, this would mean Highbrook could only accommodate five more users requiring a net lettable area above 5,000 m² and the largest customer requirement that can be provided for is approximately 10,000 m². Goodman understands that there are currently in the order of 362 potential tenants in the Auckland market that would require sites of one hectare or more.

3.5 It is vital that the assessments and monitoring undertaken under the NPS correctly identify land parcels in each category of activity, such as industrial, and not just "business land" in general.

Issue: the sizes of individual parcels of different types of "business land" are not well understood

3.6 For example, in relation to industrial land, it is not sufficient to simply look at the total land area available for development within this category of "business land". A more detailed and accurate assessment must be undertaken that investigates the size of the individual parcels available.

3.7 Currently, within a total industrial land supply of approximately 345 parcels across Auckland, Goodman understands that 59% of that supply is provided by sites of 5 hectares or larger - but that supply is actually contained within only 21 parcels of land.

3.8 Furthermore, Goodman understands that approximately 9,459 or 93% of all industrial occupiers in Auckland have a net lettable area of less than 3,000 m², however, there are currently less than 200 parcels of land across the city that could cater for new tenants or relocations of existing tenants of this size range.

Issue: better infrastructure coordination and commitment is needed

3.9 Goodman is currently engaged in significant development projects that would ultimately unlock vast tracks of future development land. However, progress on funding agreements

¹ Proposed National Policy Statement on Urban Development Capacity Consultation Document, page 23.

between local authorities, developers and local infrastructure providers is not integrated, and is disjointed and slow.

- 3.10 The end result is often uncertainty in relation to both cost and timing outcomes. While we acknowledge that this falls outside the scope of the NPS, at the very least it is a matter deserving of guidance in conjunction with the NPS.
- 3.11 We would like to see clear national direction to local authorities to ensure that the issues noted above are addressed and that business activities are appropriately provided for so that sufficient, and developable, land is available for growth.
- 3.12 Amendments are needed to the NPS to ensure it delivers what it intends to. Our proposals are set out below.

4. PROPOSED AMENDMENTS

Equal acknowledgment of business and residential capacity

- 4.1 Goodman supports objective OA2 which calls on local authorities to provide sufficient residential and business capacity to meet demand.
- 4.2 However, residential capacity appears to be given greater weight in the NPS over business capacity. For example, policies PD4, PD5, and PD6 only relate to residential development capacity.
- 4.3 Business is a vital part of providing effective and efficient urban areas. Residential and business development need to be equally provided for in the NPS in order to ensure that local authorities do not simply focus on residential capacity at the cost of business land. This could significantly impact on the liveability of an area, and is not the best way to support effective and efficient urban areas.
- 4.4 Giving equal weighting to both residential and business development in the NPS will also be in line with the seven objectives of the NPS, which do not include any bias towards residential development.
- 4.5 We recommend policies PD4, PD5, and PD6 are amended to better acknowledge residential *and* business development.

Relief sought

Amend policies PD4, PD5, and PD6 as follows:

PD4: In giving effect to policy PD1 with respect to residential and business development capacity local authorities should have particular regard to enabling capacity:

- In the locations that the Housing and Business Land Assessments, required under policy PB1, indicates are of highest demand; and
- That is feasible.

such that it maximises the contribution to meeting demand for residential and business development.

[...]

Regional councils must have amended their proposed and operative regional policy statement to give effect to policies PD5 to PD6 by:

- The end of 2018; or
- Earlier if the Housing and Business Land Assessments required under policy PB1 shows development capacity is insufficient to meet demand; or
- Within 12 months of becoming a High Growth Urban Area.

PD5: Regional councils must set minimum targets for the supply of sufficient residential and business development capacity that must be achieved, in accordance with its Housing and Business Land Assessments, and incorporate these into the relevant regional policy statement.

These minimum targets for residential development capacity must specify:

- The total number of dwellings; and
- Different types of dwellings.

The minimum targets for business development capacity must specify:

- The total number of business lots (including the size of those lots); and
- Different types of business lots to provide for different types of productive economic activities.

[...]

PD6: A regional council's minimum targets set under policy PD5 must be set for the medium and long terms, and must be reviewed every three years. When a regional council's Housing and Business Assessments required under policy PB1 shows that the minimum targets set in the regional policy statement are insufficient to meet demand, regional councils must revise those minimum targets in accordance with policy PD5 and incorporate those targets into its regional policy statement in accordance with section 55(2A) of the Act without using the process in Schedule 1 of the Act.

[...]

Business land assessments - the NPS needs to ask for the right information

- 4.6 The definition of "business land" in the NPS is broad, and rightly acknowledges that "business land" includes industrial, commercial, retail, business park land, among others.
- 4.7 While that broad definition is reasonable, Goodman does not consider that the proposed policies in the NPS adequately direct councils to carefully think about each of those different types of "business land" when undertaking their Assessments.
- 4.8 There are a range of unique factors to consider before developing land for business activities. For example, industrial land needs are very different to business park land needs. Unlike housing, it is often unrealistic to expect industrial activities and many

business activities to "go up rather than out". Industrial and certain business activities have specific requirements for appropriate land, which means that the location and size of lots for the activities are critical in identifying suitable sites for development or redevelopment.

- 4.9 Goodman therefore supports the requirement in policy PB1 (bullet point 2) which requires Business Land Assessments to estimate "the demand for **different types and locations of floor area for the local business sectors**".
- 4.10 However, there needs to be greater direction provided to local authorities that they must expressly provide for the functional and operational requirements of different business activities and the need for outward expansion of these activities to meet demands of residential growth.
- 4.11 To address functional and operational issues faced when developing business land, we think local authorities should be required, in carrying out their Business Land Assessments under policy PB1, to estimate demand for different types and locations of lot sizes in addition to floor area. This will result in Business Land Assessments that properly take into account the requirements of *different* types of business land and will enable local authorities to have a better factual basis on which to determine how to provide sufficient development capacity.
- 4.12 Amendments to the definition of demand and the additional bullet points proposed for PA1 below will further assist in decision-makers providing for the functional and operational requirements of industrial and business land and ensure that demand for different locations of business land is not inappropriately restricted to being "within the urban area".
- 4.13 Goodman also considers there should be greater provision in policy PB5 for the range of business indicators that local authorities must monitor to ensure they are well-informed about the market's response to planning.
- 4.14 In addition, the Ministry should provide detailed guidance to local authorities on how to undertake this monitoring.

Relief sought

Amend the following definition:

Demand means:

[...]

In relation to business land, the demand for floor area and lot sizes in the short, medium and long-terms, having particular regard to:

- a) the quantum of floor area to meet forecast growth in different sectors;
- b) the demands of both land extensive and intensive activities; ~~and~~
- c) the demand for different locations ~~within the urban area; and~~
- d) the demand for different types and locations of lot sizes.

Insert the following bullet points in policy PA1:

- Providing for the functional and operational requirements of different business activities and development.
- Providing for the outward expansion of different business activities to meet the demands of residential growth.

Amend the second bullet point of policy PB1 as follows:

- A Business Land Assessment that estimates the demand for the different types and locations of floor area and lot size for the local business sectors, and the supply of development capacity to meet that demand, in the short, medium and long-terms.

Amend policy PB5 as follows:

PB5: To ensure that local authorities are well-informed about the market's response to planning, local authorities must monitor a range of indicators on a quarterly basis, or as frequently as possible, including:

- The relative affordability of housing, including the ratio of house price to income and the relative cost to rent;
- The increase in house prices and rents;
- The number of resource and building consents granted relative to the growth in population;
- Vacancy rates for business land;
- The increase in land value for business land;
- The number and type of lots available for business activities;
- The number of lots available for business activities that are owned by a single entity;
- The proximity of business land to residential land;
- The ratio of the value of land between rural and urban zoned land; and
- The ratio of the value of improvements to the value of land within the urban area.

[...]

Provide detailed guidance on how local authorities should carry out the monitoring under policies PB1 to PB5, including local authorities specifically taking into account the different types of business land.

Infrastructure

- 4.15 Lack of serviced land is a common obstacle for the development of business and residential land. It is critical that local authorities work closely with local and central

government infrastructure providers when providing sufficient development capacity, and we support the policies in the NPS which require councils to do so.

- 4.16 However, the NPS as currently framed (and particularly policies PA1 and PB3) will allow local authorities to use the lack of infrastructure as a reason to not provide more business and residential land. There is nothing in the NPS which requires councils to think about how to provide that infrastructure, or to actually provide it.
- 4.17 For example, while land identified for potential development may not currently be serviced by infrastructure, there may be situations where a developer is prepared to fund or construct the infrastructure in order to bring the development of that land forward. The NPS needs to be flexible enough to allow such options to be taken into account when local authorities and infrastructure providers are considering land to develop.
- 4.18 Goodman considers that the requirements in PA1 and PB3 relating to infrastructure are unnecessary and have the real potential to be inappropriately used by local authorities as a reason to not provide sufficient capacity through their regional and district plans.
- 4.19 We are also unclear how coordination between local authorities and local and central government infrastructure providers will take place under policies PC1 to PC3. In order to effectively implement policies PC1 to PC3, local authorities will need clear guidance from the Ministry as to how local authorities and local and central government infrastructure providers need to "work together" to ensure coordinated land use planning and infrastructure provision. Without that guidance, we are concerned that not much will change, and a lack of coordination between councils and local and central government infrastructure providers will continue.

Relief sought

Amend policy PA1 as follows.

PA1: By decision-makers:

- Providing for an urban form that maximises the potential for social and economic exchange within the urban area.
- Providing for the efficient use of resources, having particular regard to scarce urban land ~~and infrastructure~~.
- Enabling the competitive operation of land and development markets.

Amend policy PB3 as follows:

PB3: In carrying out the assessments required under policy PB1, local authorities must estimate the sufficiency of development capacity provided by its plans and proposed and operative regional policy statements, having particular regard to:

- The cumulative effect of all zoning, objectives, policies, rules and overlays in plans, and the effect this will have on opportunities for development being taken up.
- ~~The actual and likely availability of infrastructure.~~
- The current physical and commercial feasibility of development capacity.

- The likelihood of opportunities for development being taken up.

and must estimate the additional development capacity needed if any of these factors indicate that the supply of development capacity is not likely to meet demand in the short, medium or long-term.

Provide detailed guidance on how local authorities should implement policies PC1-PC3 and take a coordinated approach with local and central government infrastructure providers, including guidance on:

- which local and central government infrastructure providers should be consulted in certain circumstances;
- how consultation will take place and in what capacity; and
- how to address disagreements between local authorities and local and central government infrastructure providers on data and projections used in the development of the Housing and Business Land Assessments.

Ensuring appropriate consultation

- 4.20 Policy PB4 requires local authorities, when carrying out Business Land Assessments, to:
- ...consult with infrastructure providers, community and social housing providers, the property development sector, and any other stakeholders as they see fit.
- 4.21 The second bullet point of policy PD9 requires local authorities, when developing a future land release and intensification strategy, to:
- [t]ake into account the views of infrastructure providers, land owners, the property development sector and any other stakeholders as they see fit.
- 4.22 Policy PB4 and PD9 as currently worded could be interpreted as local authorities only being required to consult and take into account the views of the property development sector "as they see fit". This needs to be clarified. When undertaking these critical pieces of work, local authorities must be directed to consult and take into account the views of the property development sector.
- 4.23 Requiring local authorities to consult with the property development sector also enables that sector to provide information to local authorities about business demand and the specific requirements for land to make a range of business developments feasible. Stakeholders like Goodman are best placed to inform local authorities on the functional and operational requirements of business activities and their commercial viability.
- 4.24 Goodman also seeks clarification as to how consultation will take place in practice. In order to effectively implement policies PB4 and PD9, local authorities will need clear guidance from the Ministry as to how local authorities need to identify appropriate stakeholders in the property development sector to consult with.

Relief sought

Amend policy PB4 as follows:

PB4: In carrying out the assessments required under policy PB1, local authorities must consult with infrastructure providers, community and social housing providers, the property development sector and any other stakeholders ~~as they see fit~~.

Amend the second bullet point of policy PD9 as follows:

- ~~Consult with and~~ Take into account the views of infrastructure providers, land owners, the property development sector and any other stakeholders ~~as they see fit~~;

Provide detailed direction in a Ministry for the Environment guidance document on how local authorities should carry out consultation under policies PB4 and PD9.

Ensuring monitoring assessments are published

- 4.25 Goodman considers that local authorities should be required to publish the assessments and monitoring under the NPS, rather than merely have regard to the benefits of publishing them.
- 4.26 Requiring that the assessments and monitoring be published places an appropriate check on the local authorities that they are effectively carrying out the objectives and policies of the NPS. If a local authority decides not to publish its assessments and monitoring, key stakeholders will struggle to determine whether appropriate monitoring is being undertaken by the local authorities and whether key indicators are being taken into account.
- 4.27 The assessments also provide critical information to the property development sector as to potential future demand for business activities and allows them to forecast with greater clarity the business needs in the short, medium and long terms.

Relief sought

Amend the last sentence of PB1 as follows:

Local authorities must ~~have regard to the benefits of publishing the~~ assessments under policy PB1.

Amend the last sentence of policy PB5 as follows:

- Local authorities must ~~have regard to the benefits of publishing the~~ results of its monitoring under policy PB5.

Definitions: "urban area"

- 4.28 Appendix A1 provides a detailed classification of urban areas. As such, providing a definition of "urban area" is unnecessary and will lead to confusion as to what amounts to

an urban area when this is already clearly identified in Appendix A1. We are also concerned that the definition as currently provided will enable local authorities to discount rezoning developable greenfield land on the basis that the land does not have "urban characteristics" and a "moderate to high concentration of population."

Relief sought

Delete the definition of "urban area".

Implementation of the NPS

- 4.29 Implementing the NPS will be a complex process. Goodman strongly supports the creation of a technical working group that includes key stakeholders in the business land/development sector to develop guidance material on how the NPS should be given effect to.
- 4.30 We are grateful for the opportunity to submit on the NPS and would welcome any opportunity to speak to the Ministry about this submission in more detail.

GOODMAN (NZ) LIMITED:

A handwritten signature in black ink, appearing to read "J. Dakin".

Signature:

John Dakin
Chief Executive Officer
Goodman New Zealand

Date: 14 July 2016

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