

Submission by Landlink Limited

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Submitter Type: developers
Source: Web Form
Overall Position: Neutral

Clause Will the proposed NPS improve decisions made about urban development under the RMA?
Notes If we understand the policy statement correctly it requires territorial authorities to complete a closed door housing and business land assessment, consult with other local authorities (where relevant), infrastructure providers, community and social housing providers and developers before enacting changes to district plans and resource consent processing. It is not at all clear how decisions can be improved by forcing the council to make all the substantive decisions before a section 32 analysis, public consultation or assessment of environmental effects.

Clause Will the proposed NPS support greater understanding of the demand and supply of development capacity?
Notes That will depend entirely on the quality of the housing and business land assessment for which no detailed guidance appears to have been provided.

Clause • a better understanding of how planning interacts with the market?
Notes Probably

Clause • the ability for councils to plan for and respond to changing demand?
Notes Possibly

Clause Would the policies in the proposed NPS support better coordination in regard to land use planning and infrastructure provision?
Notes Possibly

Clause The NPS proposes timeframes and frequencies for assessments, targets and monitoring. Are these reasonable? Are they appropriate?
Notes Probably

Clause What will assist councils to implement the proposed NPS?
Notes Increasing staff and resource capacity in-house as well as best practice advice for processing resource consents and the conditions imposed.

Clause Do you have any further comments on the Government's proposal?
Notes The regime proposed seems overly complex to implement, monitor and enforce at the local level.

Clause Process for Developing the NPS
Notes It is not at all clear how decisions can be improved by forcing the council to make all the substantive decisions before a section 32 analysis, public consultation or assessment of environmental effects.

Clause Implementation - General / Other Guidance and Capability
Notes Increasing staff and resource capacity in-house as well as best practice advice for processing resource consents and the conditions imposed.