

# Submission by Benjamin van den Eykel

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New Zealand

**Submitter Type:** Individual  
**Source:** Web Form  
**Overall Position:** Support in Part

**Clause** Will the proposed NPS improve decisions made about urban development under the RMA?  
**Notes** Holistically yes. The decisions will be more fully explored but it remains to be said how this will be tied to an enforceable pathway to actual property affordability.

**Clause** Will the proposed NPS support greater understanding of the demand and supply of development capacity?  
**Notes** They will provide a greater understanding. I remain unconvinced how this will translate into action. Being made to collect data and assess is not the same as being made to take action when x threshold is reached to achieve y objective.

**Clause** • a better understanding of how planning interacts with the market?  
**Notes** I think it provides scope for parties with a better understanding of the impact of planning on markets to get involved with such planning.

**Clause** • the ability for councils to plan for and respond to changing demand?  
**Notes** It will highlight to councils their existing levers to respond to changing demand, but that is not always the same as empowering their use in the face of notable local opposition. Furthermore other distortions such as the impact of the Christchurch rebuild on the supply of builders mean there will still be a costly delay in the implementation of any such better plans. For the medium and long term I would recommend an exploration of options of how to ensure targets can be met in a timely manner that factors in restrictions on the supply side.

**Clause** Would the policies in the proposed NPS support better coordination in regard to land use planning and infrastructure provision?  
**Notes** Does better coordination mean there will be a wider net of involvement or a discharge of duties across agencies? For the former I am unconvinced a more consultative approach will also be able to lower costs from time delays. For the latter it remains to be said how these agencies will be held accountable in a scenario where the quality of their output is substandard.

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

**Notes** Do these timeframes reflect different resourcing levels at the respective Councils? Many of the targets were qualitative in their wording leaving room for their challenge by a savvy NIMBY able to connect something like development capacity to environmental carrying capacity.

**Clause** What will assist councils to implement the proposed NPS?

**Notes** Clear guidance from central government (e.g. templates, step-by-steps, outline of priorities and principles), scope for discussion and review between councils, and a dedicated channel of communication with technical experts at least for the initial roll out of the NPS.

**Clause** Do you have any further comments on the Government's proposal?

**Notes** The qualitative nature of the proposal leaves room for resistance. How will these qualitative features be tied down? And what mechanism will be used to hold Councils to account for how well they interpret this NPS? Will Urban Development Agencies be formalised at the national level to provide a degree of consistency? How does central government envision offsetting breaches of local democracy for the sake of nationally significant developments? Urban Development Agencies are an intriguing and frankly overdue development, but as it stands their lack of real teeth means a capability gap between objectives and feasible deliverables.

I am from that generation coming to terms with the idea that a diminishing hope for a future as a homeowner in NZ is basically the same as no hope of being a homeowner in NZ. I don't want to leave my country but every year I have less of a say in the matter. This NPS is an important first step, but by being so qualitative and afraid to offend this only says to me that my future ranks below other priorities. I will be interested to see how aggressively central government will dog Councils but I hesitate to hold my breathe that this will make a difference in time for me.