

Submission: Sam Price

I am a Town Planner with a number of years of experience in various planning roles in Auckland and Wellington. I am supportive of the Commission's efforts to better understand the impacts that the planning profession and current regulatory settings has on the ability of councils to plan for new housing supply, and continue to provide new housing supply.

My submission is limited to Question Five, as I am of the view that there are a number of ways that local authorities could be measured with current data that are not pursued by current monitoring agencies.

Question five: What data sources will be most useful in identifying effective local authority planning processes for the development of land for housing?

There are three different themes of data that would illustrate how effective local authorities are being in providing land for housing.

Resource consent processing

The efficiency and effectiveness of the resource consent process impacts the ability to provide new housing, particularly when the consent process isn't clear or is costly it reduces the ability for the market to innovate or test alternatives. Some measures could include:

1. **Number of applications withdrawn.** Presently, MfE only reports applications granted or declined, it does not report applications withdrawn. In my own experience, when an applicant doesn't want to pay the costs of notification, or if Council officers advise they may decline the application, applicants tend to withdraw their applications. Measuring the percentage of applications withdrawn for the TLAs being studied would show the ease with which people are engaging with the consent process. This could be done on a more detailed level as well, e.g. number rejected/withdrawn before s88 decision, number withdrawn before a s95 decision, and number before a s104 decision.
2. **Average cost per consent.** There is anecdotal evidence that the consenting cost varies greatly between Councils. Measuring the average processing cost per consent would help to understand this.
3. **Average elapsed days.** Councils measure consents in working days, but number of elapsed days is a measure used by some councils as well. This is the total number of working days between a consent being lodged and granted, regardless of s92. Councils with a low average elapsed days would presumably be more effective as they are processing applications and requesting less information, or requesting less complex information that takes a long time to prepare. This data could also be used to audit council processes, e.g. for a non-notified consent if total elapsed days minus total days on s92 is more than the total working days reported for the consent, then it shows the use of other mechanisms to place applications on-hold, e.g. 'on-hold at applicant's request'.

Provision of new infrastructure

New infrastructure, particularly water and wastewater, are integral to new development being enabled. There are some simple measures available to local authorities that don't appear to be reported and compared at a national level, such as:

1. **Total dwellings added.** As a measure of additional capacity added to the network in the previous 12 months (not actual number of dwellings added). E.g. if works to the network in the last 12 months have increased capacity to hypothetically add xyz dwellings to the network.
2. **Total dwellings planned.** A measure of the forward work programme (12 month, 3 year and 10 year) in terms of how much additional capacity will be added measured by how many dwellings that additional capacity would service.

Plan making process

Council efforts to provide for growth through the plan making process are difficult to measure as these processes are infrequent and cumbersome (which is a part of the problem!). However, one measure would be the hypothetical development capacity added to each council through its last plan review.

Most councils should now have a second generation district plan. They should also be able to identify the additional residential capacity that was created through these second generation plans, either through the zoning of new land or increased allowable density.

Measuring this additional capacity relative to growth or total housing would show how effective the council is in providing direction for new housing supply.