

## Using Land For Housing Inquiry – Submission Points from Ian McComb

I have been involved in land development for over 25 years as a developer, consultant and Council staff member. I commend the Commission staff for their draft report and agree with most of the conclusions and recommendations. Points worthy of submission are:

### **A: Infrastructure Changes**

*Infrastructure standards imposed by councils can be a source of tension between developers and councils. Decisions about imposing or changing infrastructure standards should be evidence-based and subject to robust cost-benefit analysis. Where a good case to change infrastructure standards exists, those developments already with consent should be exempt from the change or be compensated for the additional costs incurred.*

This needs to be balanced against the length of time that a consent runs as developers try and secure large developments and slowly develop them over as much as 15 years. This locks in less than current infrastructure provision for Councils. Allowing Developers to does also reduce the supply of land to market as they deliberately ride the cycles and create scarcity to maximise return rather than speed to supply to market.

**Recommended position:** 5 years subdivision consents should be the limit for protection from Council infrastructure rule changes.

### **B: Infrastructure Standards**

*Variations in infrastructure standards between different councils may create unnecessary costs for developers and infrastructure providers that work across multiple council areas.*

They undoubtedly do, for little good reason in many cases. NZS 4404:2010 has helped to address this and Hamilton and the surrounding Councils and Tasman/Nelson have worked on aligning their requirements to reduce this burden. However, greater national guidance is still required in the planning for urban stormwater management. There is also a significant gap in the stormwater guidance of NZS4404:2010 and The Building Act/Code and E1 Acceptable Solutions document.

**Recommended position:** Improve quality and alignment of national stormwater guidance

### **C: Natural hazard planning and risk avoidance**

The draft document includes “hazard” in two places and neither of these relate to natural hazard risk-to-development avoidance as part of an improved planning process that co-exists with streamlined mechanisms for land release. This creates a real risk of more activity of lower quality as hazard management is NOT adequately dealt with by existing RMA and Coastal Policy Statement processes. A better approach to quickly determine catchment wide hazards and plan their mitigation to facilitate urban development is needed. NIWA/GNS have Riskscape (<https://riskscape.niwa.co.nz/>) which seems to have good potential to assist in this space. However overall central government leadership is required to guide Councils and drive outcomes. For urban stormwater the costs of adequate modelling are dropping substantially with new software and improved computing power but there seems to currently be limited skilled operators and a lack of

central drive to PLAN TO AVOID the hazard. The historical result is areas such as South Dunedin, parts of Wellington and the red/blue zones in Christchurch. With climate change, we risk creating massive new areas of at-risk developments from stormwater, coastal inundation, erosion and landslip.

**Recommended position:** Require long term hazard mitigation plans as part of City growth plans.

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