NBEA and the SPA

The Natural and Built Environment Bill (**NBE Bill**) and Spatial Planning Bill (**SP Bill**) were introduced into the House last month. Since then we have been carefully reflecting on the opportunities and challenges that could arise from them – not only for our clients and the work they do and for our colleagues in related professions (especially the planning community) - but also for decision-makers and those tasked with specific roles including mana whenua.

This article seeks to capture some of those reflections. We hope it is useful to you, particularly as the submission deadline for both Bills (30 January 2023) looms large. More on that later.

We wanted to begin by acknowledging what might be obvious, but can easily go overlooked in the maelstrom of opinions and musings on these Bills; namely, that it is, and has always been, an enormous challenge to develop a robust legislative framework that adequately addresses the wide variety of issues, interests and concerns that are of fundamental importance to the way we live in our natural and urban environments, but are also the subject of often wildly divergent views.

Height to boundary issues and tree pruning can feel as critical to some as the management of significant waterbodies, indigenous biodiversity and large-scale infrastructure development and the NBE Bill, like the Resource Management Act (**RMA**) before it, attempts to provide a framework to manage all of these activities and many more both great and small. In that context, we want to acknowledge the mahi of many, many people to get the Bills to this point in the process. There are features of these Bills that people – including us – will critique (in some cases, heavily!) and seek to revise or remove entirely – that is an inevitable, important part of the process. Nevertheless, the introduction of these crucial Bills into the House is a big milestone that has involved a significant amount of work, and undoubtedly no small amount of stress, for many.

Despite that work, critically (and in our view somewhat disappointingly), the Bills themselves, with some limited exceptions, do not deliver a transformational step-change from the status quo. Increased involvement from mana whenua, environmental limits, system outcomes and emboldened national direction could all, to a greater or lesser extent, have been initiated under the RMA. Existing Fast-Track legislation could equally have been amended to widen its ambit with significantly less fanfare and cost to continue its role in a post-Covid landscape.

Such outcomes were perhaps unlikely however in an environment where (at least politically) the prevailing view was that "the RMA is broken". For better or worse, the Act that has served us in one shape or another since 1991 has long lost political and public favour and is now the scapegoat for many failings of the wider system. For that reason alone, change is inevitable – even if the answer is more of the same rather than sweeping reform.

That said, a new tool-kit will ultimately enable a new approach to implementation (if political impetus remains strong post-election). Taken in that spirit it certainly isn't all vanilla nor all doom and gloom. We think there are some sound, even exciting(!), features to this new framework that have the potential to achieve positive transformation for our natural environments and our communities. We've highlighted some of those below. Alongside those features, we've also identified a few more challenging – or less favourable – aspects of the Bills, as well as a few which might best be described as total head-scratchers!

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SIX THINGS WE LIKE

1. Improved recognition of the relationship between tangata whenua and the environment and improved opportunities for mana whenua involvement in decision-making

Compared to the existing framework, the Bills take significant steps towards a genuine partnership approach between Māori and public authorities in the management of the environment, not only in terms of specific involvement in decision-making, but also in recognising and seeking to embrace a te ao Māori approach to:

- how we see the relationship between people, communities and the natural environment (captured by te Oranga o te Taiao); and

- how we practically engage with and manage the natural environment (recognising the mātauranga, tikanga and kawa of iwi and hapū).

Under the Bills, the principles of te Tiriti o Waitangi/the Treaty of Waitangi must be implemented or given effect to in each exercise of power or performance of any function under the Bills. The responsibility and mana of each iwi and hapū to protect and sustain the health and well-being of the natural environment must also be recognised and provided for.

The way in which these directives are to be implemented – particularly if the mātauranga, tikanga or kawa is in contest – will need further guidance. The mandated appointment of specialists with expertise in those matters to decision-making (or recommending) bodies under the Bills, such as independent hearings panels, will go some way to supporting compliance with those requirements.

In addition, the NBE Bill also provides for:

- the establishment of a National Māori Entity to monitor as well as support positive progress on implementation of te Tiriti principles in decision-making under the Act; and

- the election of a minimum of two Māori appointed members to the all-important regional planning committees, tasked with preparing regional spatial strategies and natural and built environment plans.

There are various other ways in which the Bills seek to provide better recognition and protection of matters of particular interest and value to Māori, as well as opportunities to secure improved and more formalised engagement between public bodies and mana whenua. However, in terms of the transfer of decision-making power to iwi authorities, while the process has been simplified somewhat, the (wide) discretion to agree or decline that request still remains with the local authority or regional planning committee. So, as with the RMA, the most meaningful method to recognise the rangatiratanga of mana whenua exists as a possibility – whether it will get used is another question.

2. Reduced protection for status quo

In ways both advertent and inadvertent, the RMA has all too often resulted in outcomes which favour the status quo by placing a great deal of weight on existing scenarios. That has undoubtedly had a constraining effect on our ability to deliver housing – for all types of people – as well as prevent degradation of our natural environment.

Both Bills, but particularly the NBE Bill, seek to address this current issue in a number of ways, including by:

- Removing any requirement to maintain or enhance amenity values. Under the RMA, this consideration has regularly enabled credence to be given to a community's desire for things to stay the same.

- Requiring consideration of "the likely future state of the environment" as set out in relevant planning documents.

- Providing the opportunity to use an adaptive management approach to prescribing consent conditions where there is likely to be a significant change in the environment, but the timing and magnitude of that change are uncertain.

In certain circumstances, requiring activities which are authorised through existing use rights to comply with plan rules relating to "the natural environment" and "the reduction or mitigation of, or adaption to, the risks associated with natural hazards, climate change, and contaminated land".

- Providing an enhanced ability to review and cancel resource consents.

All of these mechanisms have the potential to generate significant, positive outcomes for our natural and built environment, provided they are used carefully. The requirement to consider "the likely future state of the environment" will be particularly useful in better enabling development in areas identified within planning documents for future intensification.

We emphasise caution in the use of these mechanisms; however, given some of them have the potential to significantly undermine certainty of investment, including, perversely, those which are vital for the health and wellbeing of our communities as well as the planet. A balance between the need for some certainty while also being responsive to the health of our natural environment is required; while there is still room to improve how that balance is achieved, overall, we think the Bills offer a better starting point in this respect than the RMA.

3. More teeth

The Environment Court's heavy enforcement workload reveals that the temptation to "give the proverbial finger" to the requirements of the RMA often prevails over the decision to initiate what can be very expensive, lengthy consenting processes. Those scenarios have been "encouraged" in a sense by the prospect of reasonably small fines, a lack of monitoring (in part resulting from a shortfall in funding), and the fact that historical non-compliance will have little relevance to the question of whether consent for any future activity will be granted.

The NBE Bill proposes significant changes to address those shortcomings including:

- A significant increase in maximum fines for offences – up to $1m for natural persons (compared with the current maximum of $300,000) and up to $10m for companies (compared with $600,000 under the RMA).

- Outlawing of clauses that insure for any non-compliance with the NBE legislation. Insuring against a liability to pay a fine or other pecuniary penalty under the NBE Bill will be unlawful and no court may grant relief in respect of such policy.

- As part of an assessment of a resource consent application, consent authorities may consider any history of non-compliance by the applicant for which enforcement action has been taken.

- If any person acquires monetary benefits – i.e. profit – from any offence against the NBE Bill, that person can be ordered to pay the value of the monetary benefits as a fine.

- Adverse publicity orders may now be made by the Environment Court on application by a regulator, requiring an offender to publicise their non-compliance.

4. Environmental limits

It has always been possible to impose hardline environmental limits, or protections which achieve that, under the RMA – but it is only in recent years that we have seen attempts to actually do so.

Under the NBE Bill, the setting of environmental limits in respect of at least some aspects of the natural environment (air, indigenous biodiversity, coastal water, estuaries, freshwater and soil) will be mandatory. The setting of those limits (within the National Planning Framework (**NPF**) or Natural and Built Environment plans – discussed below) is supported by a series of provisions which act to prohibit activities or initiatives that would breach those limits, albeit with limited exceptions. Exemptions from the requirement to comply with those limits can be granted by the Minister (on request from a regional planning committee) where the loss of ecological integrity is justified by the "public benefits".

We think this exemption "carve-out" is a sensible compromise to what is otherwise a hardline position on environmental limits. There are, and will continue to be, some projects which are of such significant value to the country – and the natural environment – but are also of a scale or in a location where breaching of a limit is inevitable. In that scenario, the appropriate solution is to give the Minister the responsibility for determining which outcome should prevail.

The formulation of environmental limits for specific areas (described as management units) is going to be a challenge, not in the least because of the wide-variance in quality data that is currently available on the existing ecological integrity of many of those natural environment features. In that context, it is not

difficult to imagine that, at least initially, the Minister might divert responsibility for setting those limits to regional planning committees in Natural and Built Environment plans (rather than in the NPF).

Our final musing on limits (at least for now): because of their (almost) absolute nature, it is critical that they are set to an appropriate baseline. If that limit is set too high, it will quickly strangle the ability to achieve other important outcomes identified in the Bill. There are other mechanisms within the NBE Bill to provide protection for those features of the natural environment (such as targets) – so it doesn't need to be – and shouldn't be – a choice between environmental limits or nothing. Those other mechanisms simply enable a more nuanced, considered approach which will be appropriate in most cases, given the wide variety of outcomes that the NBE Bill aims to achieve.

5. Contamination

A major gap in the RMA has always been the absence of any straightforward mechanism to require – or recoup the costs of – remediation of contaminated land from a polluter that no longer has any connection to the land.

In response, the NBE Bill has included a specific "polluter pays principle" which gives standing to the Environmental Protection Authority (**EPA**) to recover from the identified polluter any costs of remediating or preventing/remedying the effects of contamination caused by that polluter. The mechanics of how this system will work are reasonably clunky, and could do with some refinement, but it is very much a step in the right direction in terms of the management of contaminated land.

6. Fast track process

Having helped a number of clients successfully navigate the COVID-19 Recovery (Fast-track Consenting) Act 2020 (**COVID Act**), and Francelle having acted as chair of one of the expert consenting panels, it is fair to say that we are fans of this legislation and the fast-track consenting process it provides.

As signalled, it has been largely repackaged into the NBE Bill as the new "specified housing and infrastructure fast-track consenting process (the **FT Process**)", which may be used to approve (via consent or designation) certain "eligible activities", including urban or whenua Māori housing developments; transport projects; health and corrections facilities; and other infrastructure projects. The renewal of consent for renewable energy generation projects is a listed "eligible activity" but, interestingly, new generation projects are limited to wind and solar.

The FT Process under the NBE Bill includes most of the same steps as the COVID Act. Applicants seeking to use the process must seek approval from the Minister, who may only decline that request if the activity is not "eligible", or if the Minister considers that another consenting process is more appropriate. Unlike the COVID Act process, the Minister is not obliged to consult on that decision. If the request is granted, the application is referred to an expert consenting panel. In another (arguably less helpful) departure from the COVID Act process, unless regulations provide otherwise, the panel must notify the application in accordance with the requirements of the NPF or the relevant plan and submissions may be made. The panel may decide whether it is appropriate (or not) to hold a hearing on those submissions; if a hearing is held, a decision on the application must be issued no later than 90 days after submissions close. If no hearing is held, that decision date is 60 days after the close of submissions. Appeals may only be made to the High Court on points of law.

With fast-track applications now able to be notified, the primary advantage in terms of speed (and reduced cost) appears to be the implied presumption against holding a hearing (under the COVID Act no hearings have occurred). We think this process is likely to be very popular for that reason – and given the breadth of "eligible activities", we think that the EPA – and candidates for appointments to expert consenting panels – can expect to be very busy with these applications in the coming years.

5 THINGS WE LIKE LESS

1. Notification

"Cheaper" and "speedier" are adjectives that have been used to describe the new consenting process under the NBE Bill, but having worked our way through the proposed notification provisions, it is fair to say we have significant doubts.

There is a clear intent to try and shift decisions on notification of resource consent applications to the NPF and plan-making stages, which would in theory reduce some uncertainty (with associated time and cost implications) that exists within the current system (noting, of course, that there is already an ability to prescribe notification requirements).

The reality however is that there is still ample discretion within the NBE Bill to "pass the buck" on that particular decision – first to regional planning committees in respect of plan-making and then on to consent authorities on case-by-case decisions. So, unless the Minister and regional planning committees are prepared to make what are often difficult decisions to include or preclude public involvement with limited information and usually no specific proposal in mind, we think it is likely that consent authorities will still be making the majority of those decisions.

While it is at least helpful that the Bill includes presumptions on notification for controlled (no notification) and discretionary (public notification) activities, in our opinion the value of those presumptions is substantially eroded by mandatory requirements for public and limited notification which apply to the Minister (when developing the NPF) or those tasked with developing the plans. Perhaps of most alarm is the requirement for those decision makers to mandate public notification of a resource consent application where "there are relevant concerns from the community". "Community" is not defined, nor is the phrase "relevant concerns". It goes without saying that it is possible to drum up community concerns about any topic, so a mandatory requirement to publicly notify applications where these exist is entirely contrary to the "cheaper" and "speedier" intention of this new system.

Further, while redirecting notification challenges from the High Court (via judicial review) to the Environment Court (via declaration, with accompanying orders) will make it more straightforward to launch those challenges, that very outcome will make applications more vulnerable to challenge. Moving notification challenges into the realm of the Environment Court will mean that, in addition to appealing the merits of a substantive consent decision, disgruntled parties will also have the ability to challenge the merits of the notification decision, including any findings as to the level of effects. Comparatively, under the existing regime, the focus of the High Court's inquiry into notification decisions is limited to the legality of the *process* that was followed in reaching that decision, not whether that decision was "right" in a substantive sense. The ability to litigate findings of fact on two separate instances within a process has the potential to add significant delay and cost. That said – it might allow us to build a body of case law that actually provides some real guidance. The jury is out for us on whether these provisions will produce a more streamlined consenting process – on balance we think not.

While the extent to which it is required is a matter of debate, the fundamental importance of having public input into the way we use and manage our environments is axiomatic in a democratic society. New and different perspectives can enhance the quality of decision-making. The trick, in our experience, is working out the stage at which that input will be most valuable and maximising that opportunity, rather than making provision for public input at every stage of the process – incurring significant cost and delay for the whole system.

Getting this balance right will help deliver the kind of meaningful efficiencies that the Government has promised, but we think there is still work to be done.

2. "Places of national importance", "areas of highly vulnerable biodiversity" and "effects management framework"

These are (inter-related) tools within the NBE Bill which impose significant constraints on activities within or affecting specific areas of the natural environment.

"Places of national importance" (**PoNI**) are:

- An area of the coastal environment, or a wetland, or a lake, or river, or its margins that has outstanding natural character.
- An outstanding natural feature or outstanding natural landscape.
- Specified cultural heritage.

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- A significant biodiversity area.

- An area that provides public access to the coastal environment, or to a wetland, lake, or river or its margins.

All PoNIs, other than public access areas and specific significant biodiversity areas, must be identified in plans, and any activity that would have a "more than trivial" adverse effect on the attributes that make that area a PoNI "must not be allowed" (prohibited) unless specific and very limited circumstances apply. Activities with more than trivial adverse effects on areas of highly vulnerable biodiversity (defined in the NBE Bill) are also prohibited, unless a specific (again very limited) exemption exists or the activity is part of a protected customary right.

Alongside, or as part of, these tools, an effects management framework applies to adverse effects on significant biodiversity areas and specified cultural heritage, requiring offset or "redress" for adverse effects where they cannot be avoided, minimised or remedied. Exemptions from the requirements to comply with that framework are also available through the NPF.

It may well be that this framework and an outright prohibition of activities which adversely affect these areas are the appropriate management solutions, but it is our firm view that the decision is best left either to the Minister in the development of the NPF, or the regional planning committees in developing plans. The purpose of the NBE Bill, and the environmental limits, targets and system outcomes, provide sufficiently clear direction on the importance of these aspects of the natural environment, but the specific way in which they are managed (particularly in the context of the other system outcomes) should be left for resolution at the plan-making stage.

3. Designations – more complicated

Designations are an important planning tool under the RMA which are available to Ministers, local authorities and network utility operators undertaking "public good" works or projects. We are pleased to see that the potential scope to use them as a form of planning approval has been expanded to other agencies delivering "public good" projects.

We are less pleased however that the process for securing a designation appears to have become more – not less – complicated. While the requirement to lodge a notice of requirement is still in place, outline plans of work have been replaced by the requirement to lodge a primary "construction and implementation plan" (**CIP**) and, in some cases, a secondary CIP. Primary CIPs address the construction and operation activities of the work, the anticipated effects and how those effects will be managed. The secondary CIPs address the same kind of matters required for an outline plan. Regional planning committees are authorised to notify notices of requirement and primary CIPs. Public notification is required if the notice or CIP is inconsistent with a regional spatial strategy (developed under the SP Bill). In certain circumstances, committees may also notify secondary CIPs. Although it is not immediately clear from the provisions, it would appear that committees would be authorised to hold a hearing in relation to both CIPs, if it decided to.

In our opinion, the dual CIPs add an unnecessary level of complexity to the designations process, particularly given the prospect of two rounds of notification and two hearings, and then a potential appeal. As a planning tool most commonly deployed for large-scale public projects, there is a real opportunity to think about how designations can be enhanced to support the delivery of the regional spatial strategies, which are themselves subject to a public process. One option may be through preclusion of public notification of designations where they align with regional spatial strategies. We expect a number of submissions from existing requiring authorities on the detail of these provisions at Select Committee stage.

4. Plan changes and strategic content

There are some creative new features to the plan making and plan changing process, including the introduction of the "proportionate" process (which requires targeted or limited notification) and an "urgent" process (available in specific, exceptional circumstances). (It is somewhat telling that the timeframe for a decision under the "urgent" process is still a year.)

The ability to enter into an Engagement Agreement between regional planning committees and iwi authorities, customary marine title groups and other Māori groups within the region is another new, positive feature. These will set out how both groups will participate together in preparing new plans, and plan changes.

We are far less enthusiastic about the outright preclusion on any person (other than a local authority and regional planning committee) requesting independent plan changes which "affect the strategic content of a plan". "Strategic content" is not defined in the NBE Bill or the SP Bill, but it is reasonable to anticipate that things like urban boundaries and the preclusion on developing outside of those boundaries would fall within that category. In our opinion, that preclusion places unwarranted faith in the ability of plans (and in fact any strategic document) to always successfully predict and control where and how land uses occur and develop, and how our natural environment is managed. Where a shortcoming or a gap in the plan inevitably arises, persons should have the ability to at least request a solution to that – even if it affects an issue of "strategic content".

5. No hearings for regional spatial strategies

As noted above, regional spatial strategies (**RSS**) will be required for each region under the SP Bill. These documents must give effect to the NPF as directed, and Natural and Built Environment plans must be consistent with RSSs. The content of an RSS is also a relevant consideration for consent decisions and for designations.

In short, they are powerful documents – setting out the strategic direction and key priority actions over a 30-year timeframe for a raft of matters designed to support the region in giving effect to the purpose of the NBE Bill.

Responsibility for preparing RSSs lies with regional planning committees, who are also authorised under the SP Bill to design how the process for preparing those documents will take place (albeit with some mandatory requirements). One of those mandatory requirements is public notification of the draft RSS. However, a step which is not mandatory is the requirement to hold a hearing on submissions received.

Given the importance of these documents within the wider regime, we think that hearings should be mandatory, as they provide a vital forum for engagement and discussion between the committee as decision makers, and those who are most affected by those decisions. Earlier we talked about how the timing or stage of public input in resource management processes is so vital in terms of extracting the best value from that input. In our opinion, development of the RSS is one of – if not the – most ideal points within the whole framework for undertaking robust, detailed consultation and engagement with the community. The RSS will be reasonably high level – so its development provides a great forum for ideas and discussions within the community about the "what, where, how and who" of planning over the long term in the region.

A FEW HEADSCRATCHERS

1. Various drafting and definitional issues, including some of the following (which are particular favourites of ours):

a. **The NBE Bill does not apply to the Crown's activities.** It might be a clever strategic move, but we think it is probably just a drafting error – clause 12(2)(a) currently precludes the NBE Bill from applying to work or activity of the Crown that is a use of land within the meaning of clause 17. Take a look!

b. The definition of **public work** is simply "includes work that relates to the construction of eligible infrastructure". Have the shackles of the incredibly circular Public Works Act 1981 definition finally been released?

c. The definition of **operative** means that the provision or plan—(a) has come into force and has legal effect; and (b) has not ceased to be operative. "Comes into force" is not defined anywhere, and "legal effect" and "operative" are two quite different stages in planning. Clause 135, however, describes how rules become operative – a simple reference to this would do the trick.

d. The definition of **plan** includes both a plan and a proposed plan. **Proposed plan** is subject to a separate definition. **Rule** is defined as a rule in a plan, while a **plan rule** is defined as a rule in a plan or a proposed plan. Combine that with the definition of **operative,** and you've got yourself a real pea souper.

e. **Redress** is the new **compensation.**

2. Low income/disability provisions

The Bill precludes decision-makers from considering the adverse effects of land uses by people on "low incomes", people with "special housing needs" or people whose disabilities mean they need support or supervision in their housing. None of those descriptors are defined anywhere.

While we understand and strongly support the attempt to resolve this particular mischief, we think the execution of that intent – and in particular, how it will work in practice – is problematic and invites exploitation. In our opinion, there are more effective ways of ensuring that the needs of the people who are the focus of these provisions are supported within the planning framework, including through the use of specific directions in both the NPF and the Natural and Built Environment plans – particularly in relation to notification.

3. Scenic views from road.

Additional matters that must be disregarded in consenting decisions include adverse effects on scenic views from private properties or land transport assets that are not stopping places (i.e. roads).

With respect to views from private properties, this exclusion codifies what has been established through case law and we agree that this is appropriate.

However, there are a number of viewshafts within district plans which take their point of origin from road corridors, and are specifically designed to protect important views for example to Auckland's maunga. Notwithstanding that protection, under these provisions, adverse effects on those views where they are seen from the road will need to be disregarded. If the provisions remain in their current form, we anticipate a rush of applications for additional height within these viewshafts.

4. Water consents and discharge of contaminants

Consistent with its wider move toward "adaptive management", the NBE Bill proposes a 10-year maximum duration on resource consents granted for:

- the taking, using, damming, or diverting of water, excluding open coastal water and geothermal water;
- the discharge of any contaminant or water into water;
- the discharge of any contaminant onto or into land in circumstances that may result in that contaminant (or any other contaminant emanating as a result of natural processes from that contaminant) entering water; and
- a land use activity that would otherwise contravene section 22(1)(a) and (b) (discharge relating to water).

In principle, the rationale for this approach is understood as it will better enable water allocation and management of waterbodies more generally.

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However, a 10-year maximum duration will have a potentially significant (and chilling) impact on the financial viability of large schemes which rely on secure access to water.

Helpfully, there are specific carve-outs from this maximum limit for some existing hydro-schemes, other renewable energy generation which connects to the national grid, as well as Council water supply infrastructure and other significant "public good" infrastructure. There is also the opportunity to amend this duration in specific areas in accordance with freshwater allocation initiatives which may be included in the relevant plan. However, for activities falling outside those categories, this feature has the potential to cast a long cloud over the prospect of any long-term investment.

CONCLUSION

If passed (and that is likely given the current make-up of the Government), the Natural and Built Environment Act and the Spatial Planning Act (and the Climate Adaption Act, once it lands) will set the course for the way in which our cities and towns evolve and grow; how our necessary infrastructure is delivered; the way in which our natural environments are managed; and how all of these 'features' of Aotearoa will respond to our climate crisis.

From what we have seen to date, there are some sound initiatives within the Bills which should deliver improved outcomes for both the natural and built environments, and the communities they support. There are also features which could significantly undermine those outcomes, and the broader purposes of reform.

Given the significance of this regime for our country (and in view of its complexity and sheer length), it is incredibly disappointing to see such a limited time period afforded for public submissions on the Bills (which are due on 30 January 2023). Excluding the standard RMA Christmas shutdown period, the public (and those who work advising in this space) will have a little over four weeks from the Bills' first reading to review, digest and make comment on the Bills, with the majority of that four-week period falling over the Christmas build-up and mid-January, where many people are away, juggling school holidays and/or have limited availability.

In isolation, that would be cause for concern. Compounding the issue is that legal and planning practitioners have spent the last two years responding to endless new developments – implications of National Policy Statement on Urban Development 2020, Medium Density Residential Standards introduced through the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021, National Policy Statement for Highly Productive Land 2022, and now submissions on the various intensification planning instruments across the country (for example 2,500 submissions were received on Auckland's Plan Change 78, with further submissions closing on 13 January 2023). There have been countless reminders to clients that it is important to engage, but fatigue is setting in. Resources are spread thin (a universal issue in post-Covid times).

Despite wide-spread push-back from representative bodies including RMLA, Property Council, and Local Government NZ, there has been no recognition of the human cost of the pace of reform and no indication from the Government that an extension to this deadline is likely. To that end, if you would like assistance in drafting a submission or would like any more information on how the Bills might affect your projects, please don't hesitate to contact us – and preferably as soon as possible!

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