

Regarding the Consultation on RMA National Direction

Package 4 – Going for Housing Growth

August 2025



Submission of Taituarā – Local Government Professionals Aotearoa regarding the consultation on RMA National Direction Package 4 – Going for Housing Growth

Taituarā — Local Government Professionals Aotearoa (Taituarā) thanks the Ministry for the Environment and the Ministry for Housing and Urban Development (HUD) to submit on the Resource Management Act (RMA) 1991 National Direction Change for Going for Housing Growth (GfHG) package.

What is Taituarā?

‘Taituarā’ is Aotearoa New Zealand’s leading membership network for professionals working in and for local government. As an independent, apolitical organisation, Taituarā works proactively on the professional, technical, and practical aspects of policy, legislative, and regulatory change. Active, genuine, and early engagement with Taituarā ensures the Government gets the best advice to make its policies work effectively and ultimately results in quality policy, legislation, and implementation.

Introductory comments

Local voice and place making

Taituarā supports the intent of National Direction Package 4 to enhance housing and urban development outcomes. However, we remain concerned that the design of the new resource management system risks diminishing the role of local government and the ability of councils to collaborate with communities and stakeholders in shaping their environments.

Local councils and communities possess deep understanding of their distinct natural and built environments. Yet, under the proposed changes, their autonomy and capacity for local decision-making—and thus meaningful place-making—will be significantly constrained. Aotearoa’s diversity demands a system that balances standardisation with flexibility. Councils need the ability to tailor planning responses to local conditions, ensuring that non-standard approaches are not burdened by excessive process. We agree that nationally standardised zones may streamline planning but they risk erasing the ability of communities to reflect regional and local character and respond to unique needs.

Spatial planning and early implementation

Taituara supports mandatory spatial planning, and that spatial plans have regulatory weight. Many councils have already developed spatial/strategic plans to direct future growth, with approximately 80 spatial plans across Aotearoa.

The recent 'Plan stop' provisions have created a significant opportunity to 'jump start' preparations for the new resource management system. Councils will be required to develop spatial plans under the replacement resource management legislation. There is an opportunity for the Government to partner with local government now to provide signposts about the spatial planning framework. This will enable councils to get on with preparatory work for spatial plans work ahead of the legislation changing. Providing enough information to inform the direction of travel will definitely help with the timely implementation of the new system.

We suggest working with local government to identify other "no regrets" work that can be started now, ahead of formal legislative change.

Financial planning and resourcing up

Councils need sufficient information now, ahead of resource management legislation being introduced, to ensure councils are able to factor this into their financial planning. Councils funding cycles are 3-yearly, and the work for next (2027) Long Term Plans (LTPs) starts before the end of 2025.

It is worth pointing out that financial planning for local government is more complex now than in previous cycles. Firstly - water reforms are presenting a new challenge. The two different paths being taken by councils have different implications for funding practice. Secondly - the Government is expected to introduce a form of rate-capping in the next Bill amending the Local Government Act (expected by Christmas). And thirdly, the Government is overhauling the powers councils have to fund growth with a new development levy system and a change to the targeted rating powers

With so much change across the system, early visibility of the timeline for change in the resource management area is essential, to help councils manage the change as an integrated whole and ensure resource is provided.

To ensure sufficient funding is provided in LTPs, in the context of spatial planning (as an example), these are the sort of questions that need to be answered to enable councils to undertake financial planning:

- What is the scope of the spatial plan
- Timeframes for development
- Governance arrangements; who is leading development?
- Consultation requirements – LGA or quasi-judicial as per the RMA?
- IHP process and distribution of costs

Infrastructure funding

A key challenge for fast-growing cities is that infrastructure development struggles to keep pace with a city's rapid growth. To meet the demand, these fast-growing councils require more effective mechanisms to recover development costs, ensuring that the principle that "growth pays for growth" is upheld. Alongside the resource management changes, Taituarā seeks clarity of the new financial tools being proposed by the Government to ensure growth can indeed pay for growth. To some extent, as we have not seen final proposals on the changes to Development Contributions, it is difficult to respond to some of the questions.

Related to this, Taituara is concerned that the Fast-track Approvals Act and "Plan Stop" (which does not apply to private plan changes) risk bypassing areas identified in FDSs, weakening the role of spatial planning and the ability for councils to plan for the provision of infrastructure.

Implementation

We note that the implementation of the new resource management system is likely to exacerbate already stretched planning resources, and we would like to work with officials to better quantify the cost implications of implementing the new resource management legislation. Taituara urges the Government to acknowledge the significant burden on local government by providing resourcing support for implementation.

Taituarā welcomes the relationship we have developed with officials as we work on the next changes to the RMA and on its implementation.

1. What does the new resource management system need to do to enable good housing and urban development outcomes?	We agree with the direction of travel being taken by the Government - reorienting the system to be outcomes-focused (rather than effects-based). This would support the robust assessment of a project's benefits alongside its costs and effects, rebalancing the system away from a singular focus on potential negatives. Taituarā has concerns regarding the proposed wholesale shift of key policy settings from local to national government. While national direction can be useful in providing overarching frameworks and standards particularly around matters of national importance, local authorities have a detailed understanding of their unique communities, constraints, and infrastructure contexts. Policy set at a national level risks diminishing the ability of local authorities to respond to the local context and is likely to undermine community trust in planning processes. We urge caution in centralising policy setting and recommend that any national policy shift be balanced with strong mechanisms for local input, partnership, and flexibility. Taituarā is concerned that the focus of much of the resource management system design on addressing problems in fast growing parts of the North Island will mean that less time and attention will be given to addressing issues that are important for towns and cities in the remainder of Aotearoa. The new system should enable councils to modify nationally standardised zone rules where bespoke provisions are considered necessary. We also caution that growth must be managed within real-world constraints, particularly regarding infrastructure capacity. Infrastructure is a critical limiting factor that must be planned and sequenced appropriately.
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	Taituara strongly supports the inclusion of funding and cost recovery mechanisms within Pillar 2. The current model, which places a significant burden on local authorities to fund infrastructure for development, is unsustainable.
2. How should spatial planning requirements be designed to promote good housing and urban outcomes in the new resource management system?	Taituarā supports a focus on spatial planning. Spatial plans have the potential to provide greater certainty to the market about when and where infrastructure will be available. All parties will benefit from greater certainty as to where and when growth will occur to ensure infrastructure is properly planned and available when it is needed. A spatial plan will also identify where development should not occur or where other values are more important (eg conservation values, highly productive land). To be implementable, the spatial plan must be linked to an agreed plan for infrastructure investment. Careful thought is needed regarding standardisation for spatial planning. New Zealand's diversity means that standardisation of all elements will not be successful. To achieve good urban outcomes, spatial plans should: • be mandatory • have regulatory weight • integrate land use and infrastructure from planning through to delivery • recognise the diversity across Aotearoa – standardise approach but not all elements We are concerned that a planning system focused on enabling responsiveness will likely result in urban expansion in locations where infrastructure cannot be efficiently provided. Such an approach risks undermining long-term strategic planning and the efficient use of public investment. Spatial plans have the potential to help address this problem. The new RM system should introduce minimum evidence requirements for submissions seeking rezoning through plan changes and identification of new growth areas in Spatial Plans. This must include, at a minimum, considerations related to biodiversity values identification, infrastructure

	servicing, and natural hazards. At present there is no such requirement and the cost of assessment falls to ratepayers. Clarity on the relationship between a spatial plan and the subordinate regulatory resource management plan and other plans eg Regional Land Transport Plans, Long Term Plans is needed. If an area is identified for development in a spatial plan, does this mean a “smoother” (e.g. quicker) regulatory pathway regarding the subordinate district plan, or even an opportunity to be developed via consent before a plan change? If so, this has implications for financial planning with respect to the provision of infrastructure including the development of infrastructure plans as it will change the assumptions around how quickly land will develop vis a vis the related programme of necessary upgrades to public infrastructure (for example increased water supply or wastewater treatment capacity). This relationship needs careful thought.
3. Do you support the proposed high-level design of the housing growth targets? Why or why not?	Tier 1 and Tier 2 councils have been required to set housing growth targets. These have been useful to drive growth policy and planning settings to accommodate the long-term population growth and employment requirements. The current proposal seeks to use housing growth targets to increase land supply to create a more competitive land market. The rationale is that greater land supply will lead to more affordable housing. The proposed changes may not achieve the outcomes sought by the Government. Imposing higher targets has the potential to create an oversupply of land in the wrong places, increase the infrastructure deficit, and is unlikely to translate into affordable housing or better urban outcomes. The proposal requires councils to use high growth projections (plus a 20% contingency) and live zone land to cater for 30 years capacity. For areas where population growth is low, the infrastructure gap will be exacerbated. Requiring all councils to use the 30-year high growth target will lead to

misallocation of resources. There are only a small number of fast-growing urban areas around the country and there are more areas experiencing slow growth.

We consider that some degree of standardisation will bring clarity and make things clearer and less open to challenge, however we are concerned with the proposal that a council may be required to use forecasts prepared by a particular agency rather than using an agency selected by the council. Councils should have the option of choosing from the low, medium or high projections provided by StatsNZ based on a robust justification that considers local economic trends and the community's demographic profile.

We agree that the key challenge to competitive land supply is the lack of infrastructure. New funding tools will certainly help. However, live zoning land that still cannot be developed because of a lack of infrastructure is inefficient and has the potential to create dysfunctional land markets.

The gap between plan-enabled land and 'developable' land is further limited by applying the 'feasibility' and 'realistic' tests. These are key considerations and speak to the potential challenges of realising development through intensification.

Recommendations:

- Require councils to use the most likely/appropriate growth projections, with the option to use high growth projections for councils that are experiencing high growth.
- Ensure the forecast can be used for both land use and infrastructure to ensure that the same forecast numbers are used across all land use and infrastructure planning. This will avoid a widening gap between land use and infrastructure.
- Improve the methodology for calculating development capacity so that it focuses on matters that are in a council's control.

4. How can the new resource management system better enable a streamlined release of land previously identified as suitable for urban development or a greater intensity of development?	It is unclear whether the proposed agile land release mechanism would be available to any council with development areas identified in a (statutory) regional spatial plan or district plan - or only those with nationally set growth targets. Taituarā encourages consistent mechanisms for all land zoning for future development, regardless of whether growth targets apply. The Government's proposals are unclear about what the process for notifying, consulting and making decisions on spatial plans and district plans will be. It is also unclear what level of detail will be required in the evidence to support spatial planning, and even district plan changes, under the new system. Taituara presumes both the process and the evidential detail will be more granular than what is required to appropriately design and zone a development in a district plan. It is also presumed that the latter would require a more detailed structure planning process that would be introduced into a district plan through a notified plan change process. It is essential this detail is clarified and communicated soon (well before the end of 2025) so councils are able to determine the resources needed for the next Long Term Plans. The proposal is for councils to be required to provide for 30 years growth using the high population growth forecasts. Taituarā supports using an 'indicative urban zone' which shows land earmarked for urban purposes that is not ready to be developed. Deferred zones are temporary, transitional zones used by some councils for land which a council wishes to retain for future urban, or more intensive urban use, either when more appropriate levels of servicing are available or after a period to maintain a coherent urban form. It allows for land to be zoned, and then servicing worked on, and then released for development. It has historically been used by a number of councils. The underlying zoning of land identified as Future Urban Zone (FUZ) (e.g. rural) applies until the urban zoning is triggered. Taituarā has sought that a simple pathway under the RMA is needed to allow the final zoning to apply once the preconditions are satisfied.
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Dunedin has fully operative transition zone provisions in its district plan. Residential Transition Overlay Zones (RTZs) are used where a future residential zoning has been identified but the land is held in a current (typically rural) zoning until infrastructure is available generally due to a wider network capacity issue. The transition rules allow for infrastructure to be available or for the funding for necessary upgrades to be in the long-term plan in short to medium term (depending on timing of need) or a private development agreement is agreed to ensure the infrastructure will be delivered. The transition of land is managed through a certification process, where land is released by the Chief Executive Officer or their delegate, once the identified conditions are met.

Taituarā supports some form of planning mechanism that would trigger a process to confirm the appropriate land use zones and signal a green light for development.

Elements of this process could be:

- A high-level structure plan for each indicative urban area setting out key infrastructure requirements (large-scale or bulk infrastructure) with indicative timing and staging for land release.
- Structure plans could be more detailed for areas that are likely to be developed in the first five years and higher level for those areas that are expected to be developed later.
- Land should be released through a council-led zone change in accordance with the structure plans
- An infrastructure plan that identifies the infrastructure that needs to be provided, timing, responsibilities and funding (including Development Levies, Developer Agreements, or other funding tools)
- This process should apply to areas that are included in either live zone areas or indicative urban zone areas. When the proposed land use zoning, infrastructure requirements, and any other contingencies are agreed, this can be confirmed through a streamlined process and included in the district plan. Consenting can then be done at pace.

	The key is to incentivise up-front collaboration to come to agreement on key land enablement matters before entering into a statutory, legal process. We consider that the 'indicative urban zone' land be included in the housing growth capacity. We agree with the premise in the consultation document that it is not efficient, affordable or desirable to provide 30 years of land supply that is infrastructure ready now. Land should count towards the target when there is a 30-year plan to deliver the infrastructure. For all changes to natural environment plan chapters and land use / planning chapters under the new resource management system, the legislation needs to provide a more streamlined planning process that retains public and affected party consultation and hearings at the front end of the process, with hearings by independent, well qualified hearings panels, but curtails the ability to contest decisions through the various Courts.
5. Do you agree with the proposed methodology for how housing growth targets are calculated and applied across councils?	Taituara has concerns about the proposed methodology. Councils have expressed concern that StatsNZ projections adopt a "top down" approach to demographic projections that do not consider local nuances such as internal migration, population growth, consenting trends, and urban planning initiatives. The submission of Hamilton City Council clearly outlines the issues they encounter with StatsNZ projections and the gaps. As a result, they have concluded that the Stats NZ projections are not the appropriate dwelling demands to be used for Hamilton. Their concerns cited were: • The Stats NZ's SA2 projections only cover 2018-2048 with five-year intervals, meaning that councils must disaggregate it to annual intervals to be able to compare the annual trend. However, Council also requires projections over 30 years for planning purposes and infrastructure strategy. The Stats NZ's SA2 projection highlights a big gap in this implementation. • Stats NZ in the past has published household projections a year earlier than the population projections. This means Stats NZ's household projections are not well aligned to their population

	projections or with their stated assumption that household size is declining and there will be an increasing number of one-person households in the future. For Hamilton, data shows that the projected number of households is increasing at a slower pace than projected population increase, suggesting that Hamilton households are expected to increase in size as opposed to decreasing. This misalignment is a critical gap and will lead to inconsistent policy decisions.
6. Are there other methods that might be more appropriate for determining housing growth targets?	In principle, councils should retain flexibility in selecting the most appropriate projection for its needs. Although it is important to have one standard of adoption across the regions, Stats NZ's SA2 household projections are too granular and lack local specificity and insights, making them unsuitable as a baseline for some regions. Also, the granularity of SA2 projections may introduce greater error margins. Some councils use Te Ngira's Territorial Authority (TA) household projections—commonly referred to as NIDEA—which incorporate local data and have historically provided more reliable outcomes.
7. How should feasibility be defined in the new system?	We defer to the detailed submissions of councils on this point. Relying on feasibility to measure capacity over a 30-year horizon may not align with the goals of the GfHG initiative. If feasibility is to be used, it must be clarified whether it should reflect only current conditions or also project future feasibility. In the latter case, a clear approach is needed for handling inflation within the modelling framework. Commercial feasibility is highly sensitive to current economic conditions, which fluctuate over time due to factors like interest rates, construction costs, and financing—many of which are outside local government control. As a result, assessing feasibility at a single point in time does not accurately reflect the long-term impact of council policies.

	Taituarā would suggest a multi-criteria assessment framework to evaluate feasibility. This framework should distinguish between critical factors - such as significant hazard risks or site contamination - that can render a project unfeasible on their own, and secondary factors, which may only impact feasibility when compounded with other issues
8. If the design of feasibility is based on profitability, should feasibility modelling be able to allow for changing costs or prices or both?	Taituara agrees that changing costs should be included in feasibility models to keep them practical. However, some developments—like social housing—aren’t meant to be profitable, so standard profit measures don’t apply. Looking at profit at just one point in time doesn’t reflect how markets actually work, since prices and costs change. Instead, long-term assessments should use reasonable adjustments, backed by clear and consistent rules. Profit expectations should depend on the context. Thresholds need to reflect current market conditions. The government should study what profit margins developers use in different regions, recognizing that expectations vary. National guidelines should be clear and consistent. For instance, a 10% margin for multi-unit projects might be more effective than a 20% margin for smaller developments.
9. Do you agree with the proposal to replace the current ‘reasonably expected to be realised’ test with a higher-level requirement for capacity to be ‘realistic’?	A capacity target can only be called “realistic” with proper context. Whether the change works depends on how clear and detailed the guidance is. Some factors—like land covenants, steep slopes, or current land use—clearly affect development potential, but many cases are more complex. Hazards like flooding and liquefaction should be included when calculating plan-enabled capacity, since they impact whether development is actually possible. On the other hand, “realistic” capacity

	depends on what the market can deliver. For example, four-storey apartments may work in Auckland but aren't as viable elsewhere due to different market preferences. More clarity is needed on what "realistic" capacity means. Does it have to meet 30 years of projected demand at all times, or just in the current year? Without a clear definition and guidelines, it's hard to judge if the proposed approach is suitable.
10. What aspects of capacity assessments would benefit from greater prescription and consistency?	There are a number of aspects that would benefit from greater prescription and consistency with respect to capacity assessments. These are: • Data inputs and standardisation: if transport and water demand figures were developed to agreed standards - for both residential and business use - it would improve coordination between local councils, central government, and private partners. For example, a standard measure for household water demand across New Zealand would allow regions to collect and compare data consistently, supporting a unified national database under the Planning Act. • Standardised calculation methodologies that incorporate consistent assumptions for development yield ranges and material costs: these methodologies should also account for frequently overlooked factors such as geotechnical investigations and flood management requirements, which can significantly influence ground preparation costs • Better baseline data on construction costs: a major challenge in feasibility testing is the absence of robust baseline data on construction costs. To overcome this, the Ministry of Housing and Urban Development (HUD) could strengthen its Housing Dashboard by integrating more granular metrics. • Standardised formats for reports and mapping outputs.

11. Should councils be able to use the growth projection they consider to be most likely for assessing whether there is sufficient infrastructure-ready capacity?	Taituarā recommends that councils should be able to use a 30-year growth projection that they consider is the most likely for their city/district, to assess whether there is sufficient infrastructure-ready capacity. Councils are best placed to understand the growth dynamics within their jurisdictions. Taituarā considers that keeping an infrastructure buffer adds extra costs for current ratepayers. It increases maintenance and operational expenses, and also raises financing costs—because there's a longer gap between building the infrastructure and when development actually happens.
12. How can we balance the need to set minimum levels of quality for demonstrating infrastructure capacity with the flexibility required to ensure they are implementable by all applicable councils?	Taituarā supports clear direction being provided via defined methodologies that support councils' assessments. However, we caution against a high level of prescription and instead recommend an approach that sets out minimum requirements, allowing for greater sophistication for those councils that have robust data and more advanced tools for quantifying capacity. Infrastructure assessment rules need to be clearly defined, with guidance on when wider strategic networks should be included. It's fair to ask councils to provide evidence - including privately funded infrastructure providers - to show they can meet likely demand. But expectations for long-term infrastructure shouldn't be too strict. Councils shouldn't have to fully fund projects 20–30 years out. If a project is listed in their Future Development Strategy (FDS), especially beyond 10 years, that should be enough to show intent. Requiring firm commitments far into the future puts financial pressure on councils, especially for uncertain or high-risk projects. It could also limit their flexibility to support unexpected development opportunities.

13. What level of detail should be required when assessing whether capacity is infrastructure-ready? For instance, should this be limited to plant equipment (e.g. treatment plants, pumping stations) and trunk mains/key roads, or should it also include local pipes and roads?	Taituara believes that capacity assessments should be detailed, to the extent that the necessary information is actually available, and appropriate to the size of the development. Some Tier 1 councils that are dealing with major infrastructure constraints have created tools and a policy to guide how much detail is needed, which parts of the network are assessed, and how this is communicated with developers. Officials should work with Tier 1 councils to understand the work they have done. Assessments should also include social and community infrastructure needs, as required by the NPS-UD. Housing should support well-functioning communities with access to schools, parks, jobs, and essential services. Lastly, demonstrating infrastructure capacity at a neighbourhood level (suburb or smaller) is often not feasible before a development proposal is presented to a council.
14. Do you agree with the proposed requirement for council planning decisions to be responsive to price efficiency indicators?	Market volatility makes this difficult to respond to. It is unclear whether HUD will create price efficiency indicators itself or rely on councils for the data. Any published data should reflect local market conditions, not a one-size-fits-all number, since each region is different. There's also uncertainty about when HUD will release this data and how often; having current data available during capacity assessments is crucial for accuracy. Lastly, fast-track areas could affect the market by drawing demand away from other locations, creating bigger price gaps between Fast-track and non-Fast-track areas.
15. Do you agree that councils should be required to provide enough	Taituarā supports the proposal in principle to provide sufficient development capacity for business land to meet 30 years of demand. This includes identifying sites and locations suitable for business uses in the Spatial Plan. We seek further clarification on the timeframe for implementation of this.

development capacity for business land to meet 30 years of demand?	We caution against the requirement being too prescriptive: • targets need to be sufficiently flexible to account for data limitations and assumptions about the future economy that make target setting challenging; • spatial planning needs to reflect land that is suitable for different types of business uses Councils will need to be able to retain land for business purposes. There is often pressure to rezone this land to residential development, thereby creating issues regarding achieving targets.
16. Are mechanisms needed in the new resource management system to ensure councils are responsive to unanticipated or out-of-sequence developments? If so, how should these be designed?	See our response to Question 4 regarding mechanisms for land release. For land that is identified as indicative urban land ie deferred urban (or similar), Question 3 considers Scenario 1 and sets out proposed requirements for addressing out-of-sequence development proposals. The discussion paper considers there is a need for a 'release valve' to address out-of-sequence development proposals. Taituarā does not agree a 'release valve' is warranted to justify development of land beyond what is required for 30-years or that additional requirements for 'responsiveness' are required to force councils to accept proposals for land are outside a 30-year planning window. We do recognise that there may be circumstances where a development proposal may be suitable for development. The responsibility to demonstrate this should sit with the applicant and the bar should be high.
17. How should any responsiveness requirements in the new system incorporate the direction for 'growth to pay for growth'?	Taituarā supports the underlying principle that 'growth pays for growth' and acknowledges the proposals that are being developed under Going for Housing Growth Pillar 2 (Funding and Financing). This is contingent on two matters: • the ability to decline inappropriate or inefficient growth proposals; and • the availability of effective and flexible financing mechanisms to fund the infrastructure required to support growth.

	It is essential that growth occurs in appropriate locations, not in locations that would require extensive infrastructure upgrades or extension of services. Given the high cost of infrastructure, priority should be given to areas where servicing is more efficient and cost-effective. Councils should retain the discretion to reject growth proposals where the infrastructure costs are disproportionate, inefficient, or unsustainable. The regulatory instruments and the funding requirements must work in tandem, and any responsiveness requirements in the new system should include mechanisms to ensure that the required infrastructure will be paid for, irrespective of whether it be funded by development levies, the Crown, the council, or the developer. The failing in the current system lies with the current funding arrangements, the inability to confirm that funding arrangements are in place, and identifying the parties that will be responsible for the provision and funding of infrastructure. To address this, any development proposal should be required to include an assessment of the full extent of infrastructure that will be needed to service the proposed development. The scope of infrastructure to be considered in the assessment should be specified in legislation/secondary legislation. The development proposal should specify, in relation to both publicly provided and developer-provided infrastructure: • who will be providing the infrastructure • when the infrastructure will be provided • how the infrastructure will be funded • what infrastructure will be provided under development levies • contributions from adjacent landowners
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	The new system should provide the ability to attach infrastructure funding obligations to land held by landowners that choose to wait for the developments around them to proceed and then utilise infrastructure that they have not contributed to. The new system provides the opportunity for a new approach to developer funding. Councils need to be enabled to collect levies for longer term infrastructure requirements. A new approach to developer funding must be tied in with the new planning system so they reinforce each other. It is essential to have clarity around expectations over who should pay for what infrastructure.
18. Do you agree with the proposal that the new resource management system is clear that councils are not able to include a policy, objective or rule that sets an urban limit or a rural-urban boundary line in their planning documents for the purposes of urban containment? If not, how should the system best give effect to Cabinet direction to not have rural-urban boundary lines in plans?	Councils use the Rural-Urban boundary as a means to clearly signal where land is suitable for development and where it is not. If the ability to have a Rural-Urban boundary is removed, councils will still need a mechanism to plan and coordinate land release with infrastructure. The Spatial Plan will be critical for this. Councils need a mechanism to be able to clearly signal to the market the council's long-term infrastructure planning. RUBs are currently used to delineate the extent of where development can go. Councils need the ability to identify areas of 'no development' to reflect areas of natural values or areas of hazards or highly productive soils.
19. Do you agree that the future resource management system should prohibit any	Developments that are not adjacent to urban land are more difficult and costly to service. Bringing forward infrastructure or enabling areas not planned for development are inefficient and costly.

provisions in spatial or regulatory plans that would prevent leapfrogging? If not, why not?	A blanket prohibition may be too blunt an instrument; however, councils need a mechanism to manage these proposals. Proposals should be subject to a strong test on the developer to demonstrate the land should be developed and councils should be able to fully recover cost of servicing via DCS. The test should include: • assessment of all infrastructure required in the short and long-term for the development proposal and the wider area • confirmation of the timing and funding of the infrastructure • demonstration of how the proposal will address a council's transportation objectives.
20. What role could spatial planning play in better enabling urban expansion?	Spatial planning will play a key role in creating stronger links with infrastructure planning, including the identification of minimum infrastructure requirements, a stronger evidence base and the use of implementation plans over a 30-50 year time horizon. We agree that stronger linkages between spatial planning, transportation and infrastructure planning is critical to delivery of housing growth and good urban outcomes. If spatial plans are to be the key statutory document to identify transport infrastructure constraints to growth, there needs to be an explicit requirement in the Land Transport Management Act that regional spatial plans are considered when developing other key documents, like the Government Policy Statement on Land Transport, the National Land Transport Programme and regional land transport plans. With this explicit link it will help address funding of the infrastructure that is required to support regional growth that is not recognised nationally as a priority. To be effective it is essential to have central government as one of the key parties around the table to develop a regional spatial plan.

21. Do you agree with the proposed definitions for the two categories of 'key public transport corridors'? If not, why not?	We defer to the detailed submissions of councils on this matter. Taituara supports using the One Network Framework (ONF) to define key public transport corridors, but not by relying only on Table 5 (Public Transport). Focusing just on Rapid/Frequent or Spine/Primary routes oversimplifies the ONF, which is much more nuanced. The ONF's main idea is to balance "movement" and "place", how streets function and how people use them. Intensification should consider the full street context, especially walking networks, which are vital to public transport. Ignoring this by using only the PT table misses the bigger picture. Use of the ONF but it must be properly aligned with the wider movement and place framework. Public transport should be one part of that broader context, not the only focus.
22. Do you agree with the intensification provisions applying to each category? If not, what should the requirements be?	Default standardisation and national direction have the potential to provide benefits in terms of clarity, consistency and defendability. Local authorities should have an option to enable something different in circumstances where it can be justified.
23. Do you agree with councils being responsible for determining which corridors meet the definition of each of these categories	Associated with the above response, Taituarā considers that specification of intensification catchment sizes in the new system is unworkable. Across Aotearoa there is wide variability between urban environments and inclusion in national direction or legislation is likely to be inefficient and ineffective. Guidance material is more suitable.

24. Do you support Option 1, Option 2 or something else? Why?	Taituarā does not support the one-size-fits-all approach which uses fixed walkable catchments from different zones. Instead, we recommend a context-sensitive method. Walkability depends on more than just distance, it is shaped by street layout, hills, footpaths, climate/weather and obstacles. Network-based analysis should map how people actually move, resulting in catchments that vary based on local conditions. We recommend that the Government allow councils to define walkable catchments using local evidence and conditions. This will lead to more realistic intensification, better planning, and stronger community support.
25. What are the key barriers to the delivery of four-to-six storey developments at present? 26. For areas where councils are currently required to enable at least six storeys, should this be increased to more than six storeys? If so, what should it be increased to? Would this have a material impact on what is built?	Building four-to-six storey apartments is challenging, and most of the issues are outside local councils' control. The main barriers include: • Cost and economic viability • Limited buyer confidence in apartments • Gaps in the Building Code • Small, narrow sites New Zealand's building rules (NZS 3604) make it easier and cheaper to build up to three storeys using timber framing; taller buildings face additional hurdles: • Few sites are suitable • Developers often need to combine lots, which suits bigger companies • The whole building must be finished before it gets approval • Construction rules are more complex

27. For areas where councils are currently required to enable at least six storeys, what would be the costs and risks (if any) of requiring councils to enable more than six storeys?	Developers carry most of the cost for building taller buildings. Councils are mainly concerned about how these buildings might affect the quality and character of neighbourhoods. For example, heritage areas are more sensitive to change, while central city areas are likely to be less affected. In terms of infrastructure, councils would need to update growth forecasts and planning in high-density zones. But core issues like water and wastewater capacity remain, and upgrades may be needed to handle extra demand. Higher-density living also increases the need for good public transport and walking/cycling options. Supporting this shift will require more investment, and the funding challenges of expanding infrastructure must be considered when designing the new system.
28. Is offsetting for the loss of capacity in directed intensification areas required in the new resource management system? 29. If offsetting is required, how should an equivalent area be determined?	It is not clear whether the offsetting proposals for any loss of development capacity may only be applied to Tier 1 councils. Taituara has some concerns with this concept - there will already be a greater planning hurdle (a justification report), and cost for councils, to depart from standardised zones and overlays to manage for specific constraints or provide for outstanding or significant local values or features. In some / most cases, our understanding is that the implications of providing for such bespoke zone or overlay provisions will have been accommodated by councils into calculations of realistic or "reasonably expected to be realised development", and the provision of sufficient zoned land to accommodate that (as required).
30. Is an equivalent to the NPS-UD's policy 3(d) (as originally scoped) needed in the new resource management system? If so, are any changes needed to the	Yes. We support retaining an equivalent to Policy 3(d) of the National Policy Statement on Urban Development (NPS-UD), which directs intensification to areas with good accessibility to employment, services, and public transport.

policy to make it easier to implement?	
31. What controls need to be put in place to allow residential, commercial and community activities to take place in proximity to each other without significant negative externalities? 32. What areas should be required to use zones that enable a wide mix of uses?	Councils, with their partners, communities and stakeholders have developed zones as a simple mechanism to manage how land is used, developed and protected. Zones also identify and manage the effects of different land uses/activities. The spatial application of zones identifies where similar or compatible uses and activities are anticipated. The zones provide the main provisions to direct activities. Zone rules in district plans have been through substantial evaluation and often challenged through submissions and hearings. The national planning standards also clearly set out the expectations for district zoning. Taituara strongly recommends the Government researches the foundations (evidence and rationale) for a range of zones and controls on incompatible uses. It is important that controls are in place to ensure incompatible uses are separated, in order to protect communities' health and wellbeing. There are many examples where pressure is exerted from communities onto businesses where residential areas and incompatible uses are located too closely. Councils have vast experience managing this, there is no need to start from scratch.
33. Which rules under the current system do you consider would either not meet the definition of an externality or have a disproportionate impact on development feasibility?	The new RM system is premised on the fact that the market will ensure a basic level of livability standards in the design of housing. The reality is that people who cannot afford the better housing will end up in poor-quality housing.

34. Do you consider changes should be made to the current approach on how requirements are targeted? If so, what changes do you consider should be made?	Aotearoa has a significant number of councils that are experiencing low or no growth. Taituara agrees the Government should be careful not to impose a significant burden of evidence and cost upon these provincial towns and small councils. Taituara also considers that as part of the package to support implementation, that some policy support to develop the regional spatial plans is provided at district level to enable territorial authorities to lead planning for their communities. This is important to ensure territorial authorities are resourced to be at the table in the development of the spatial plans.
35. Do you have any feedback on how the Going for Housing Growth proposals could impact on Māori?	It is essential that iwi/Māori are engaged with directly and input and concerns raised are factored into amendments.
36. Do you have any other feedback on Going for Housing Growth proposals and how they should be reflected in the new resource management system?	Taituara requests the opportunity to review and provide feedback on more advanced proposals, including legislation, policy, regulation or technical and guidance documents. This is essential to enable effective implementation.
37. Should Tier 1 and 2 councils be required to prepare or review their HBA and FDS in accordance with current NPS-UD requirements ahead of 2027 long-term plans? Why or why not?	The requirement to review HBAs and FDSs under the current NPS-UD should be suspended. Instead, more detail around the expectations for Spatial Plans should be released and councils should be encouraged to start preparation for these documents now, well ahead of enactment of replacement legislation. Given the proposed changes to the HBAs it also risks wasting time and effort to ask councils to undertake these, especially if councils need to procure new models. It may be worthwhile to require councils to continue demand assessments, but given the moving goals posts with capacity assessments, it would be wasted effort to undertake that part of the assessment.

	Taituara recommends the Government “slim down” these documents to what is needed for non-RMA instruments (and perhaps in a form useful for developing new spatial plans), and remove the requirement to have them included in LTP consultation processes as a supporting document.
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