

14 August 2025

Email: [gfhg@hud.govt.nz](mailto:gfhg@hud.govt.nz)

Dear Ministry for the Environment and The Ministry of Housing and Urban Development.

## **Waikato District Council Submission on Going for Housing Growth – Discussion document**

Waikato District Council (the Council) welcomes the opportunity to contribute to the *Going for Housing Growth* discussion document and respond to the questions it raises.

Council acknowledges the need to evolve New Zealand’s approach to housing to support sustainable urban and rural development. Achieving balanced growth requires coordinated investment in infrastructure—transport, utilities, and essential services—aligned with community needs. Flexibility and responsiveness to local context are key to fostering resilient, inclusive communities.

While reform is timely and broadly supported, it must be carefully designed to reflect local conditions and uphold Te Tiriti o Waitangi obligations, ensuring both equity and effectiveness. Council holds a range of views on the proposals—many are welcomed, while others raise concerns about potential impacts on communities.

### **Key Considerations**

- **Infrastructure Readiness**

National direction and support are essential to ensure housing development proceeds only when adequate infrastructure is adequately planned for, funded or in place. This includes clear guidance on prerequisites and greater funding mechanisms.
- **Planning Flexibility**

Planning frameworks must be flexible to and accommodate out-of-sequence growth and be adaptable to future uncertainties. This flexibility is critical to responding effectively to changing conditions. An example of needing to be responsive this includes matters like retirement villages (outside of intended zoned areas), provided that proposals align with strategic outcomes and that developers can cover the full and fair costs of necessary infrastructure. This would ensure that such development would not divert resources from planned growth areas or place additional burden on ratepayers.
- **Local Context and Rural Considerations**

Development must be responsive to and reflect the unique characteristics and needs of each community. While Pillar 1 of *Going for Growth* focuses on urban expansion, it is vital to also consider rural environments—particularly in districts like Waikato, where housing and population growth are significant. Effective planning must integrate both urban and rural perspectives to mitigating unintended consequences.

## Other Matters

- **Policy Alignment and Integration**

Council is navigating substantial change through the Resource Management Act reform and other legislative change processes. The pace and volume of these changes are challenging. A more integrated and collaborative approach—especially regarding timing and implementation—would better support Councils and communities in adapting effectively.

- **Resourcing and Implementation Support**

Successful reform requires not only clear policy direction but also adequate resourcing from Central Government. This includes national-level tools and guidance, such as spatial planning systems, to ensure consistent and effective implementation across regions.

Council looks forward to ongoing engagement and collaboration to ensure the updated national direction supports improved environmental outcomes, streamlined planning processes, and the development of resilient, economically vibrant communities.

Should you have any queries regarding the content of this document please contact Fletcher Bell, Spatial Planner directly on [fletcher.bell@waikatodc.govt.nz](mailto:fletcher.bell@waikatodc.govt.nz)

This submission has been approved by the Waikato District Council Submission Forum on the August 12 2025.

Yours sincerely,



**Jacqui Church**

**MAYOR**

**WAIKATO DISTRICT COUNCIL**

Questions		Comments
Q1	What does the new resource management system need to do to enable good housing and urban development outcomes?	<p>To enable good housing and urban development outcomes, the new resource management system comprising the NPS-UD, the proposed Planning Act, and future Single Combined Plans must clearly define the expected relationships between land use, urban design, and access to amenities. They must also be flexible enough to respond to the diverse characteristics of communities and the natural environment. At the core of the system, a set of guiding principles should be established within the Planning Act and Natural Environment Plan to ensure consistency and clarity in urban planning. These principles should prioritise public wellbeing, promote sustainability, and ensure equitable access to housing and basic services while remaining adaptive to changing conditions.</p> <p>In practice, the new resource management system must make it easier to build homes under the right conditions (physically and strategically), while also ensuring high-quality, well-functioning urban environments. This involves aligning land use with infrastructure planning and streamlining plan making and consent processes to reduce costs and delays. It also requires clear and consistent zoning rules, and greater flexibility to support a diverse range of housing typologies including affordable, and Maaori-led solutions.</p> <p>The system also needs to safeguard environmental and community wellbeing by integrating climate resilience, ecosystem protection, and quality urban design into development decisions. Strong partnerships with iwi and hapuu are essential, both to uphold Te Tiriti obligations and to ensure cultural values are reflected in land use planning.</p> <p>By focusing not only on the quantity of housing but also on the quality and liveability of urban environments, the new system can help deliver inclusive, resilient, and thriving communities. This will provide long-term cost-effective benefits for all, while enhancing the quality of life.</p>
Q2	How should spatial planning requirements be designed to promote good housing and urban outcomes in the new resource management system?	<p>To promote good housing and urban outcomes in the new system, spatial planning requirements should be built around a long-term strategic horizon that extends beyond the current 30-year Future Development Strategy (FDS) framework. A planning timeframe of at least 50 years would provide greater certainty to the market, infrastructure providers, and communities, supporting better decisions on where and when housing and infrastructure should be delivered. Embedding strong statutory weighting into spatial plans is critical to ensure that strategic decisions are consistently followed through into regulatory, infrastructure, and funding plans. This would help avoid ad hoc or short-term planning responses that undermine coherent urban development and infrastructure sequencing, enabling more predictable, coordinated, and efficient outcomes.</p>

		<p>Spatial planning should be deeply integrated with infrastructure planning to clearly identify development ready areas, including;</p> <ul style="list-style-type: none"> <li>- What infrastructure is required and when;</li> <li>- Indicating areas that require infrastructure to be development ready.</li> </ul> <p>This requires a staging or land release mechanisms that can unlock land without needing a formal public plan change, accelerating housing delivery while maintaining strategic oversight. At the same time, the spatial planning framework must allow for local flexibility to meet the differing characteristics of our communities and the environment, especially in regions composed of multiple districts with differing growth pressures and constraints.</p> <p>The ability to tailor approaches that accommodate local conditions, while aligning with overarching regional strategies, will ensure that spatial planning remains relevant, equitable, and effective in delivering housing and high-quality urban outcomes across New Zealand.</p> <p>Alternative provisions can be found in Q36</p>
Q3	<p>Do you support the proposed high-level design of the housing growth targets? Why or why not?</p>	<p>Council support, in part, the proposed high-level design of the housing growth targets for the reasons below.</p> <p>Enabling all required capacity upfront offers significant benefits, particularly in reducing the reliance on time-consuming and costly public plan changes. This approach increases planning consistency and provides greater long-term certainty to developers, infrastructure providers and to Council. With zoning already in place, it opens the door for more proactive and potentially privately driven infrastructure investment to unlock growth areas. Consideration also needs to be given to whether a hard contingency margin of 20% is appropriate, population projections naturally get less accurate the longer the horizon and a flat application of 20% might not adequately mitigate the inaccuracies</p>
Q4	<p>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?</p>	<p>A streamlined land release mechanism has the potential to significantly improve the efficiency and responsiveness of urban development. By zoning land capacity upfront and embedding triggers for land release, such as infrastructure readiness, completion of structure plans or equivalent, and alignment with transport, hazards, cultural, and community service provision, Councils could remove the need for costly and time-consuming public plan changes or variations. This approach allows development to proceed as soon as the necessary prerequisites are met, offering a more agile and predictable system. It also enables developers and infrastructure providers to plan and invest with greater confidence, knowing that once land is zoned, it can be activated efficiently without undergoing another round of regulatory approvals.</p>

		<p>Importantly, this mechanism should apply to both greenfield and brownfield areas, supporting a balanced approach to growth that maximises existing urban land while facilitating new urban expansion where needed.</p> <p>Criteria for land release should consider not only core infrastructure like water and transport but also access to essential community services such as schools and parks and should be set at a national level for consistency. By enabling land release in a coordinated and criteria-based manner, the system can promote more cost-effective development and prevent isolated or poorly serviced communities while still supporting a responsive, competitive urban land market.</p> <p>Councils need to have the ability to set the geographic targets for the capacity as there are cross boundary market considerations that will influence the expected demand.</p>
Q5	Do you agree with the proposed methodology for how housing growth targets are calculated and applied across Councils?	<p>Council support, in part, the proposed methodology for how housing growth targets are calculated and applied across Councils for the reasons below.</p> <p>The use of the SA2 high growth scenario provides an accessible and consistent data source that can be applied uniformly across jurisdictions, ensuring a standardised approach to estimating dwelling demand. However, this only forms one part of the variables within the equation to calculating dwelling demand, variances may still arise between Councils when factoring in the methodology for assessing market conditions over a given period; subsequently informing demand.</p> <p>The inclusion of a 20% buffer above expected demand is a sensible and appropriate measure to ensure flexibility and responsiveness to unforeseen changes in population growth or housing need. But consideration also needs to be given to whether a hard contingency margin of 20% is appropriate, population projections naturally get less accurate the longer the horizon and a flat application of 20% might not adequately mitigate the inaccuracies.</p>
Q6	Are there other methods that might be more appropriate for determining housing growth targets?	<p>Scenario-Based Forecasting uses multiple growth scenario's (e.g., low, median, high) incorporating demographic, economic, and migration assumptions. These are stress-tested against policy levers and land constraints:</p> <ul style="list-style-type: none"> <li>• Urban containment and carrying capacity models that integrate land-use zoning, environmental constraints and infrastructure capacity with urban form preferences.</li> <li>• Employment-Driven or Economic Forecast Models, where housing targets are driven by economic growth forecasts and job locations.</li> <li>• Infrastructure-Led Growth Targets, where housing targets are set or adjusted based on the timing and capacity of planned infrastructure (e.g. Public Transport, 3 Waters, schools and transport hubs).</li> </ul>

Q7	How should feasibility be defined in the new system?	<p>If Housing and Business Assessments (HBAs) under the NPS-UD are to be retained and further developed, Council recommends that they must be supported by robust data and evidence-based assessments, including spatially mapped infrastructure availability to ensure reliability and transparency.</p> <p>However, if HBAs are not retained or significantly evolved, then an alternative mechanism such as a macro-level financial feasibility model (e.g. a master-plan-based hypothetical development scenario) should be established. This would provide Councils with a consistent and practical tool to input indicative development feasibility, supporting strategic decision-making in the absence of detailed HBA requirements.</p>
Q8	If the design of feasibility is based on profitability, should feasibility modelling be able to allow for changing costs or prices or both?	Any relied upon profitability model should be required to have input flexibility for price-level impacts at both cost and realisation ends.
Q9	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'?	<p>Council supports to replace the current 'reasonably expected to be realised' test with a higher-level requirement for capacity to be 'realistic' for the reasons below.</p> <p>Council supports the proposal to adopt a higher-level requirement for development capacity to be considered 'realistic,' as opposed to the current 'reasonably expected to be realised.' This shift is welcomed, as it places greater emphasis on feasibility and market-driven outcomes, aligning more closely with actual development potential. However, Council notes that the effectiveness of this new requirement will depend heavily on the quality and clarity of the supporting guidance to be developed and provided. Clear, practical guidance will be essential to ensure the assessment of 'realistic' capacity is consistent and implementable across different contexts.</p>
Q10	What aspects of capacity assessments would benefit from greater prescription and consistency?	Council supports standardisation around input assumptions, any attempt to standardise common inputs across jurisdictions will improve consistent reporting.
Q11	Should Councils be able to use the growth projection they consider to be most likely for assessing whether there is sufficient infrastructure-ready capacity?	Councils should be able to use the growth projections they consider most likely, as this allows for responsive, context-specific planning that reflects the unique growth patterns across different geographic areas. However, to support greater national consistency and transparency, providing a clear and standardised definition of "infrastructure ready capacity" would help reduce variability in how Councils interpret and apply the concept, ensuring more consistent and comparable planning across regions.

Q12	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?	To balance quality with flexibility, a practical approach would be to establish high level, principles based minimum standards that outline what a robust infrastructure capacity assessment should include such as being evidence based, accounting for cumulative growth, and considerate of long-term growth strategies. Rather than mandating specific tools or models, Councils should have the flexibility to choose methods that align with their capacity and resources; for example, larger Councils might apply detailed network modelling, while smaller councils could use simpler demand forecasting techniques supported by local data. These requirements should be reviewed periodically to allow for continuous improvement as data quality and modelling capabilities evolve across the sector.
Q13	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?	<p>Infrastructure ready capacity should be defined primarily at the level of key network assets such as treatment plants, pumping stations, trunk mains, and major roads. The presence and availability of this core infrastructure signals that an area is genuinely ready for development.</p> <p>Including local pipes and roads in the definition of infrastructure ready is unnecessary and potentially problematic, as these are typically delivered by developers as part of the subdivision and development process. Requiring their inclusion could create a circular logic; development is dependent on infrastructure being in place, yet that local infrastructure is only delivered once development occurs.</p> <p>Focusing the definition on upstream or network infrastructure provides a clearer, more practical threshold for determining the readiness for growth.</p>
Q14	Do you agree with the proposed requirement for Council planning decisions to be responsive to price efficiency indicators?	<p>Council support, in part, the proposed requirement for Council planning decisions to be responsive to price efficiency indicators for the reasons below.</p> <p>Council supports the intent but notes that their application must account for limitations in statistical reliability, particularly in areas with low transaction volumes or tightly held land. In such contexts, individual sales especially those with strategic or synergistic value to the purchaser can disproportionately skew the resulting ratios.</p> <p>To ensure these indicators remain meaningful and fair, Council recommends incorporating a manageable margin of error or confidence threshold that reflects the limitations of small sample sizes and avoids misinterpretation of data in areas with limited market activity.</p>
Q15	Do you agree that Councils should be required to provide enough development	Council supports that Councils should be required to provide enough development capacity for business land to meet 30 years of demand for the reasons below.

	capacity for business land to meet 30 years of demand?	Councils, where appropriate, should be required to provide enough business land capacity to meet 30 years of demand, but this must be supported by a clear, staged release mechanism similar to that used for housing. Ensuring a long-term supply of zoned and infrastructure-ready business land provides certainty for investors and supports economic growth, while helping to avoid ad hoc development. It's also critical that business land is distributed in a way that maintains a strong employment-housing balance and aligns with a commercial centre hierarchy across spatial sub-regions.
Q16	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?	<p>Mechanisms are needed to ensure Councils are more consistently responsive to unanticipated or out-of-sequence developments. In principle, clear thresholds should be set to determine what is significant, assisting with policy 8 of the NPS-UD.</p> <p>Additionally, while allowing flexibility for out-of-sequence development, proposals should still align with overarching environmental and spatial plans to ensure they support long-term strategic goals such as climate resilience, natural hazard avoidance, and the protection of biodiversity and water resources.</p> <p>An approach to systematically address out of sequence proposal could be of similar nature to Future Proof's process for responsive planning. In the Future Proof Future Development Strategy for development that is not identified in the strategy there is criteria that a development proposal must demonstrate to have meet (Pages 71-74<sup>1</sup>). The criteria assessment considers a range factors, including whether the development supports a well-functioning urban environment through diverse housing and business opportunities, alignment with strategic growth principles, accessibility, infrastructure protection, and environmental resilience. It also evaluates the impact on planned growth feasibility, public financial sustainability, community vitality, and the ability to meet specific housing needs while supporting long-term transport and climate objectives.</p>
Q17	How should any responsiveness requirements in the new system incorporate the direction for 'growth to pay for growth'?	To effectively incorporate the "growth pays for growth" principle into responsiveness requirements, the new system should ensure that developers of unanticipated or out-of-sequence developments bear the fair cost of infrastructure needed to support their proposals. This includes not only core services like water, wastewater, and transport, but also the broader community infrastructure necessary for a well-functioning urban environment. Councils must not be left to fund these developments from existing budgets, which could divert resources from already planned growth areas or place undue pressure on ratepayers.

<sup>1</sup> [Future Proof - Future Development Strategy 2024 Part B](#)

		<p>Responsiveness mechanisms should require clear evidence that infrastructure is either already in place or that the developer has a credible, funded plan for its delivery. To support this, the system should strengthen cost mechanisms to ensure Councils have the legal and financial tools to secure fair contributions from developers.</p>
Q18	<p>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?</p>	<p>Council understands that we will not be able to set a rural urban boundary line in planning documents.</p>
Q19	<p>Do you agree that the future resource management system should prohibit any provisions in spatial or regulatory plans that would prevent leapfrogging? If not, why not?</p>	<p>Council support, in part, that the future resource management system should prohibit any provisions in spatial or regulatory plans that would prevent leapfrogging for the reasons below.</p> <p>The future resource management system should carefully consider leapfrogging provisions in spatial or regulatory plans. While not completely opposed to leapfrogging in all cases, it is important to acknowledge the significant risks it can pose particularly in terms of increased car dependency, fragmented urban form, and infrastructure inefficiency. These impacts can undermine long-term planning goals and place financial strain on both Councils and communities. Therefore, any proposal for leapfrogging development should be required to demonstrate that the associated costs and effects particularly on infrastructure and the environment are either neutral or appropriately mitigated. This would ensure that development remains strategic, sustainable, and in line with broader urban planning objectives.</p>

Q20	What role could spatial planning play in better enabling urban expansion?	<p>Spatial planning should act as a key enabler of well-organised urban expansion, guiding where and how growth occurs in a way that aligns with infrastructure capacity and environmental, social, and economic limits. Its role should be to provide a clear, strategic pathway for staged land release that ensures development is timely, coordinated, and supported by necessary resources without negatively impacting existing communities. By reducing planning uncertainty for landowners, developers, iwi and hapuu, and the wider public, effective spatial planning can create more affordable, liveable, and well-functioning urban environments while safeguarding long-term outcomes for future generations.</p> <p>As part of the Single Combined Plan, the purpose of the spatial plan should be to manage urban development in line with the system’s four core planning principles. These principles should prioritise public wellbeing, promote sustainability, and ensure equitable access to housing and basic services while remaining adaptive to changing conditions. Together, these principles reinforce the need for spatial plans to be both visionary and pragmatic. In doing so, providing a framework for growth that is integrated, equitable, and environmentally responsible.</p>
Q21	Do you agree with the proposed definitions for the two categories of ‘key public transport corridors’? If not, why not?	<p>Council supports the intent behind the proposed definitions for the two categories of ‘key public transport corridors’ as a means to guide intensification and agrees in principle with expanding the definition of rapid transit services beyond dedicated systems in Auckland and Wellington. This broader definition enables a more inclusive and regionally responsive planning approach that better reflects varying transport contexts across New Zealand.</p> <p>In principle, that the New Zealand Transport Agency’s One Network Framework classifications of ‘spine’ and ‘primary’ corridors are appropriate guides for broadly defining the two proposed categories of ‘key public transport corridors. However, it is important to ensure local context is included when determining which corridors meet the definitions to ensure the classification is not based solely on the number of public transport services in an hour, but that the services operate in a way that facilitates intensification by providing a high-level of access to opportunities and encourages mode shift.</p> <p>The intent of this suggested amendment is to ensure that growing rural districts do not create isolated pockets of car-reliant, high-density development in rural areas.</p>
Q22	Do you agree with the intensification provisions applying to each category? If not, what should the requirements be?	<p>Council does not fully support the application of the intensification provisions applying to the categories and recommends; that walking catchments be applied specifically to the locations of stops or stations along the route, rather than the entire corridor. This would ensure that intensification occurs in areas with actual access to services, rather than along potentially underserved segments of a corridor.</p>

		This is particularly important when considering the future application of Category 2 in growing rural districts, given the nature of road corridors between towns, applying these categories without broader contextual planning risks creating isolated pockets of high-density development surrounded by rural land use.
Q23	Do you agree with Councils being responsible for determining which corridors meet the definition of each of these categories?	Councils should be responsible for determining which corridors meet the definition of each of the categories. This is important to ensure that the frequency of public transport (PT) services along a corridor is not the sole defining factor and will allow local context to be considered.
Q24	Do you support Option 1, Option 2 or something else? Why?	<p>Council is largely agnostic to either Option 1, or Option 2, as there is limited application to the Waikato District currently. However, should an urban environment meet the criteria for this to apply, Option 1, is supported. This is because both options enable significantly higher forms of intensification, however, Option 1 is envisioned to be more consistent with the character of our urban environments.</p> <p>Careful consideration should be given to defining minimum catchment sizes from “key transit corridors” as this may result in walking distances to the physical rapid transit stops themselves being greater than best practice.</p>
Q25	What are the key barriers to the delivery of four-to-six storey developments at present?	Council anecdotally agrees with the barriers associated with vertical infrastructure costs between 4 to 6 storeys but also note other barriers to delivering four-to-six storey developments are the protection of visual amenities, which often limits building height and scale in established neighbourhoods. This includes concerns about shading, view loss, and changes to neighbourhood character, which can trigger community resistance and stricter planning controls. Additionally, cultural sight lines particularly those significant to Māori must be respected, and developments may be restricted or modified to avoid impacting these culturally important views or landscapes.
Q26	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	No comment

	material impact on what is built?	
Q27	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?	<p>Requiring Councils to enable buildings higher than six storeys raises important considerations around urban design, amenities, infrastructure, and economic feasibility. Taller buildings can significantly alter the character and feel of an area, and without strong urban design guidance, there is a risk of poorly built form outcomes such as overshadowing, wind tunnelling, or the erosion of pedestrian-friendly environments. Ensuring access to quality amenities like open spaces, public transport, and community facilities becomes even more critical as building heights and population density increase. At the same time, existing infrastructure particularly water, wastewater, and transport networks may not be designed to support this level of intensification and could require substantial upgrades, creating cost pressures.</p> <p>From an economic standpoint, requiring greater height does not guarantee that development will occur. In many areas, the market demand or financial returns may not justify the cost of constructing taller buildings, which often involve higher structural, compliance, and operational expenses. If the permitted heights exceed what is viable to deliver, landowners may hold off on development indefinitely, resulting in vacant or underutilised sites that fail to contribute to housing supply or urban regeneration goals. Without careful alignment between planning provisions, market conditions, and infrastructure readiness, enabling heights beyond six storeys may create more planning uncertainty than practical benefit.</p>
Q28	Is offsetting for the loss of capacity in directed intensification areas required in the new resource management system?	<p>Council supports the provision of adequate capacity to meet demand. Consideration of the appropriate areas for intensification and development to occur should be delivered through Council mechanisms. This should involve regularly monitoring land supply relative to uptake and reviewing the plan as necessary to ensure that targets are consistently met. The term 'counterbalancing' is preferred over 'offsetting', as it more accurately reflects the need to account for areas that cannot be developed or developed to a density that isn't intended.</p> <p>Single Combined Plans should clearly identify where counterbalancing has occurred and explain the methodology used. This is important because, without appropriate counterbalancing the loss of urban capacity in certain areas could lead to unintended urban sprawl. As cities grow, displaced residential demand may push development into surrounding rural or peri-urban areas such as Pookeno in the north and Ngaaruawaahia in the south creating additional cross-boundary planning considerations.</p>

		<p>Counterbalancing development supply will also need to respond to new information from the NPS-Natural Hazards and related frameworks, such as when natural hazard risks lead to down-zoning or the introduction of Urban Control Areas. Additionally, counterbalancing should account for changes triggered by cultural overlays, requiring bespoke provisions. A structured and transparent approach to offsetting controlled by councils is essential to ensure that overall urban development capacity is maintained and growth is well managed. Counterbalancing (or offsetting) should not be tool that developers can use to justify yield profitability and development in unplanned areas.</p>
Q29	<p>If offsetting is required, how should an equivalent area be determined?</p>	<p>If offsetting (Counterbalancing) is required, an equivalent area should be determined using a clear and consistent methodology that maintains the integrity of development capacity. The opportunity to consider counterbalancing should not be used as a justification for under developing infrastructure ready land, it should only be used where other environmental/hazard/cultural considerations come to light that would justify determining additional land in another location to provide the equivalent level of development.</p> <p>A straightforward approach would be a 1-for-1 displacement with a margin of difference based on square metres of developable land lost. However, it's also important to consider qualitative factors to ensure counterbalancing is genuinely equivalent this includes matching land of similar value, providing access to comparable amenities where possible, and ensuring the replacement area has similar physical characteristics such as topography and suitability for infrastructure. Where possible any counterbalancing needs to be within the same locality, if not, within a similar market. This helps ensure that the counterbalanced area can realistically support the same level and quality of development as the land it replaces.</p>
Q30	<p>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 policy to make it easier to implement?</p>	<p>The standardised zones should accommodate the original intent of NPS-UD Policy 3d, particularly with certain standardised zones allowing for mixed use.</p>
Q31	<p>What controls need to be put in place to allow residential, commercial and</p>	<p>Council recognises the value of mixed-use development in creating vibrant, accessible communities where residential, commercial, office, and civic (community) activities can coexist. To support this, appropriate controls</p>

	<p>community activities to take place in proximity to each other without significant negative externalities?</p>	<p>are needed to manage potential negative externalities (Reverse Sensitivity) without stifling the natural evolution of local areas.</p> <p>Key controls to avoid Reverse Sensitivity should include</p> <ul style="list-style-type: none"> <li>- controls on noise, odour, dust, and light pollution, to protect urban amenity.</li> <li>- Screening and landscaping can help buffer more sensitive land uses</li> <li>- specific bulk and location standards should apply when commercial activities adjoin residential/office/civic zones to ensure compatibility in scale and form.</li> </ul> <p>These measures allow for a higher degree of integration while maintaining the quality of the living environment.</p> <p>In addition to managing immediate effects, it's important to consider the broader urban structure. New commercial or office activities should align with the established centres hierarchy to avoid undermining existing Centres. Unplanned shifts in economic activity can dilute the function of core centres, reduce infrastructure efficiency, and lead to dispersed, car-dependent growth patterns.</p> <p>Controls should therefore ensure that new mixed-use development compliments, rather than competes with, existing centres supporting coordinated urban growth and the efficient use of resources while meeting the everyday needs of communities.</p>
<p>Q32</p>	<p>What areas should be required to use zones that enable a wide mix of uses?</p>	<p>Zones that enable a wide mix of uses should be prioritised in areas with high accessibility, particularly those well-served by public and active transport such as town/city centres, and where there is adequate infrastructure capacity to support intensified activity. These areas should also align with strategic growth priorities outlined in regional or spatial plans, ensuring that mixed-use development supports broader urban development objectives.</p> <p>Importantly, these zones should be located where the risk of significant externalities such as noise, traffic congestion, or environmental impact is low or can be effectively managed through design standards and controls. Introducing mixed-use zoning in such locations responds to growing market demand, enhances walkability, reduces car dependency, and creates vibrant, economically resilient communities.</p> <p>In addition to wide range mixed use zones in key strategic locations, a “narrow range” of mixed-use activities as permitted in medium and high-density residential areas, especially on corner sites. This approach allows for small-scale, community-serving businesses such as cafés, dairies, bakeries, takeaways, hair salons, shared office spaces,</p>

		<p>and community arts spaces to operate without the need for a resource consent provided they meet size and impact thresholds (e.g. &lt;150m<sup>2</sup> GFA).</p> <p>By enabling low-impact commercial and community activities in residential neighbourhoods, Councils can foster local vibrancy and accessibility while maintaining residential amenity. This targeted, graduated approach to mixed use zoning balances the need for flexibility with safeguards to prevent unintended negative effects (especially Reverse Sensitivity).</p>
Q33	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?	<p>Several rules under the current system appear either not to meet the definition of an externality or impose a disproportionate impact on development feasibility. Minimum parking requirements whether mechanised or active can significantly constrain design flexibility and inflate costs without necessarily addressing genuine external impacts. Similarly, minimum floor area standards are often redundant, as building coverage and gross floor area controls already provide effective oversight, particularly in both low-density single-use zones and high-density mixed-use areas. Setback requirements from the road in higher density zones can hinder the development of more efficient built forms such as terraced housing and mixed-use developments, which are essential for urban intensification. Additionally, rules around outlook areas in lower density residential zones, mandatory north-facing glazing, and minimum garage spaces can limit design innovation and affordability, often without delivering proportional benefits to amenity or the wider public.</p>
Q34	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?	<p>Council is currently a Tier I local authority due to its proximity and shared market demand to Hamilton City &amp; Auckland.</p> <p>The way the intensification requirements are currently linked to the relevant zones in a plan works well. Even though Waikato District is a tier I local authority only the relevant policies apply, and our small townships are not subjected to meeting City requirements. If Waikato District is to remain a tier I local authority any change to policies will need to ensure that the small townships of the district are not subject to requirements that are designed for City environments.</p> <p>While undertaking a HBA does impose costs onto the council, it has been extremely beneficial in understanding our demand and supply for the Waikato and is especially important as the district borders the two fastest growing cities in New Zealand (Auckland and Hamilton).</p>

<p>Q35</p>	<p>Do you have any feedback on how the Going for Housing Growth proposals could impact on Maaori?</p>	<p>Ensuring Maaori Input and Voice in Planning</p> <p>Council strongly supports ongoing and meaningful engagement with Maaori, including iwi, hapuu, and post-settlement governance entities (PSGEs), throughout all stages of planning reform. While initial engagement has occurred at a high level, it is essential that Maaori voices are not sidelined as the reforms progress.</p> <p>Why This Matters:</p> <ul style="list-style-type: none"> <li>• Maaori have unique relationships with land and place, grounded in Te Tiriti o Waitangi and tikanga Maaori.</li> <li>• Local government planning often involves decisions that directly affect Maaori communities and whenua Maaori.</li> <li>• Spatial plans and housing strategies must reflect Maaori aspirations, values, and cultural needs.</li> </ul> <p>Council strongly recommends the government embeds Maaori partnership as a core principle in the new Resource Management Act – Updating National Direction over and above formal consultation processes. This should include co-designing policies and ensuring Maaori have decision-making roles, not just advisory ones.</p> <p>Unlocking Whenua Maaori Utilisation (Para. 133)</p> <p>Council acknowledge that whenua Maaori face unique barriers to development, including multiple ownership, infrastructure limitations, and planning restrictions. These barriers mean that general housing growth policies may not be enough to unlock the potential of Maaori land.</p> <p>Council consider opportunities for improved planning practices should include:</p> <ul style="list-style-type: none"> <li>• Tailored planning tools (e.g., papakaaingā provisions as per the Proposed Papakaaingā NES, infrastructure grants) can support Maaori-led development.</li> <li>• Local Councils can work with iwi and hapuu to identify and prioritise whenua Maaori for housing and mixed-use development.</li> <li>• Simplifying zoning and consenting processes for Maaori land can reduce delays and costs.</li> <li>• Structure planning assessments to include whenua Maaori locality identification to plan for the development of Maaori land.</li> </ul>
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		<ul style="list-style-type: none"> <li>• Preapproved wastewater for onsite wastewater on whenua Maaori with the assessment of onsite wastewater systems be carried out by qualified and independent wastewater professionals, rather than Council approval processes</li> </ul> <p>Council recommends the development of specific interventions and funding streams to enable Maaori to develop their land in ways that align with cultural values and community needs.</p> <p>Positive Impacts for Maaori (Para. 134–135)</p> <p>Council agree that increasing housing supply and enabling mixed-use development can benefit Maaori, especially in urban areas where housing affordability is a major issue.</p> <p>Key Opportunities for improvements include:</p> <ul style="list-style-type: none"> <li>• Mixed-use zones can support marae, Maaori purpose activities (see Waikato District Plan partly operative), and Maaori businesses.</li> <li>• Intensification near transport corridors can improve access to jobs and services for Maaori communities.</li> <li>• Affordable housing targets can help reduce overcrowding and housing stress among Maaori whaanau.</li> </ul> <p>Council recommends that in order to ensure that these benefits are accessible to Maaori, changes need to remove barriers to participation in planning and development, and by supporting Maaori-led housing models.</p> <p>Responsiveness and Strategic Direction (Point 136)</p> <p>Council supports responsiveness to private plan changes, including those initiated by Maaori to develop their land. However, this must be balanced with the need to protect strategic planning documents developed in partnership with iwi and hapuu.</p> <p>Why This Matters:</p> <ul style="list-style-type: none"> <li>• Spatial plans often reflect long-term Maaori aspirations and cultural values.</li> <li>• Overriding these plans through ad hoc changes could undermine Maaori input and trust.</li> </ul>
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		<p>Council recommends policy changes maintain strong protections for strategic plans and ensure any private plan changes involving Maori land are assessed in partnership with affected iwi and hapuu.</p> <p>Concerns About Centralised Policy (Para. 137)</p> <p>Council is concerned that shifting more control to central government could reduce local discretion and weaken Maaori influence in local planning decisions.</p> <p>Why This Matters:</p> <ul style="list-style-type: none"> <li>• Local Councils often have established relationships with Maaori communities.</li> <li>• Centralised policies may not reflect local tikanga, history, or aspirations.</li> </ul> <p>Council recommends that policy enables the flexibility for local government to work closely with Maaori and tailor planning approaches to local contexts. Central government policy should set minimum standards but allow for local innovation and partnership.</p>
Q36	Do you have any other feedback on Going for Housing Growth proposals and how they should be reflected in the new resource management system?	<p><b>ALTERNATIVE Proposed provisions to Question 2 on How should spatial planning requirements be designed to promote good housing and urban outcomes in the new resource management system?</b></p> <p><b>Introduction</b></p> <p>Council considers there is a gap in the current proposed Going for Housing Growth provisions that would enable good housing and urban development outcomes. The gaps being either removal or the unknown status of current planning tools including Future Development Strategies, Structure Plans, and the role of Private, and Public (Council-led) Plan Changes. To address this gap in the current Going for Housing Growth provisions, Council proposes an alternative set of provisions and principles to promote good housing and urban outcomes in the new system.</p> <p>These alternative provisions proposed by Council would continue to allow spatial planning to meet and adapt to the requirements around a long-term strategic horizon that would extend beyond the current 30-year Future Development Strategy (FDS) framework. The planning timeframe of at least 50 years would provide greater certainty to the market, infrastructure providers, and communities, supporting better decisions on where and when housing and infrastructure should be delivered.</p>

The alternative proposed provisions would better help avoid ad hoc or short-term planning responses that undermine coherent urban development and infrastructure sequencing, enabling more predictable, coordinated, and efficient outcomes that what was proposed in Question 2 (*How should spatial planning requirements be designed to promote good housing and urban outcomes in the new resource management system?*).

## The Alternative Proposals

### Proposal One: Proposed principles to enable good housing and urban development outcomes

Council first proposed that four principles should sit at the top of the Planning Act and the NPS-UD. These principles along with the standardised zones would enable that **good housing and urban development outcomes**.

The proposed principles to enable good housing and urban development outcomes:

1. That the **public wellbeing** is above all considerations. Public wellbeing including (but not limited to):
  - a) Promote Sustainability (including avoiding Reverse Sensitivity)
  - b) Promote equity through housing and access to basic amenities
  - c) Creating and maintaining places that are able to adapt to an evolving world
  - d) Does not contravene the NPS-Natural Hazards**
  - e) Land Use and Transport are interwoven, and their relationship will shape the user experience either positively or negatively
  - f) Promote positive mental health, and inclusive social connections,
2. there must be planning for **natural resource preservation**,
3. **Functional Green Infrastructure including parks, recreation spaces, urban stormwater networks and/or forests** must be provided for,
4. there must be **planning for balanced development of land use**. This includes recognising the mutual and beneficial outcomes from both public and private sector led developments.

These principles guide the replacement land use levers proposed below in proposal two.

### Proposal Two: Replacing the Future Development Strategies, Structure Plans, and Plan Changes using the new Spatial Planning regime

Council proposes in building on from Proposal One in continuing to address the gap from Question 2 that two categories should be included in the Spatial Planning regime. Proposal Two is designed to address the gap presented in Question 2 in assisting with promoting or restricting urban expansion (while following the principles

	<p>in Proposal One). These categories also assist if someone wishes to “leapfrog” a Spatial Plan (which Council supports providing the applicant provides sufficient evidence as outlined in Question 19).</p> <p>The two categories are:</p> <p><b>The Urbanisation Promotion Area (UPA)</b> The UPA would replace the current the Future Urban Zones used in District and Unitary Plans. A UPA would be defined as a rural area to be urbanised specifically and systematically within approximately 10 years. Public facilities such as transport and municipal systems are given priority investment for implementation in the UPA. UPA’s would replacing the existing Future Development Strategies that Council need to provide under the NPS-UD.</p> <p>The Urbanisation Control Area (UCA). A UCA would be applied to an area which urbanisation is controlled/restricted or even prohibited. Urban development in the UCA is not allowed in principle. <b>As an example, UCAs would work for areas deemed High or Very High Risk in the NPS-Natural Hazards.</b></p> <p><b>Progressing an Urban Promotion Area towards a live Standardised Zone</b> When an area has been mapped as an Urban Promotion Area, a fine grain analysis would be done to prepare the area for live zoning (using the Standardised Zones) via updating the Single Combined Plan. <b>This analysis using one of the four categories gives the next step in certainty for public and private sector investment, and continuity.</b></p> <p>The updating of the SCP would be done using a revamped Public Plan Change process using one of four new categories that illustrate the type of development, and its timeline. The revamped Public Plan Change processes replace the current Structure Plans.</p> <p><b>The Urban Development Categories</b> The proposed four categories that follow on from an Urban Promotion Area would be to enable: Greenfield developments, Brownfield developments (urban intensification) and/or Grey-field (industry to residential or mixed use) developments.</p> <p><b>The new categories for Public Plan Changes in converting an Urban Promotion Area to one of the categories below. This would proceed rezoning to the requested/planned Standardised Zone.</b></p>
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• <b>project</b>	• <b>detail</b>
<ul style="list-style-type: none"> <li>• Urban Area Development Projects</li> </ul>	<ul style="list-style-type: none"> <li>• New (Greenfield) Residential Area Development Project (standard subdivision on the urban fringe not requiring <i>Extensive Long-Term Staging</i>)</li> <li>• Industrial Estate Development Project (e.g. Sleepyhead in Ohinewai, or supporting industry from the Ruakura Inland Port) (and <i>not requiring Extensive Long-Term Staging</i>)</li> <li>• New Metropolitan Centre Foundation Management Project (e.g. Drury South)</li> <li>• Land Planning Arrangement Project (Development Agreements with Private Sector)</li> <li>• Urban Area Redevelopment Project (Urban Renewal)</li> <li>• Brownfield Residential Area Development Project (Brownfield/Intensification)</li> </ul>
<ul style="list-style-type: none"> <li>• Urban Infrastructure Projects</li> </ul>	<ul style="list-style-type: none"> <li>• Infrastructure for Residential Subdivision Developments over 20 Hectares (enabling capacity per the NPS-I)</li> <li>• Infrastructure for Civic Areas (schools, police, fire service, medical, stormwater retention/detention ponds over a certain square metreage)</li> <li>• Distribution Business Districts (Inland ports etc)</li> <li>• Other urban infrastructure (parks, waste management)</li> </ul>
<ul style="list-style-type: none"> <li>• Urban Development Projects Scheduling Areas</li> </ul>	<ul style="list-style-type: none"> <li>• Early planning area and securing large-scale development and infrastructure area to prevent the speculative investment (per NPS-I and NPS UD 30-year capacity requirements)</li> <li>• New Residential Subdivision Development Project Scheduling Area (residential subdivision requiring <i>Extensive Long-Term Staging</i> e.g Te Awa Lakes)</li> <li>• Industrial Estate Development Project Scheduling Area (requiring <i>Extensive Long-Term Staging</i>)</li> <li>• New Metropolitan Centre Foundation Projects Scheduling Area (e.g Drury South Metropolitan Centre)</li> <li>• Extra Large Residential Facility Scheduling Area (Retirement Villages over 500 units)</li> </ul>

		<ul style="list-style-type: none"> <li>• Public Infrastructure Scheduling Area (per national Infrastructure strategy)</li> <li>• Distribution Business Scheduling Area (because Notice of Requirement would be filed for an inland port as an example)</li> </ul> <ul style="list-style-type: none"> <li>• <i>Extensive Long-Term Staging</i> means, intended to stage residential subdivision for 10 years or more (this not meeting the Urban Area Development Projects definition)</li> <li>• <i>Urban Development Projects Scheduling Areas</i> can be used for Greenfield developments over a certain size being delivered over a long timeframe period (aka more than 10 years. E.g. Drury South).</li> <li>• Infrastructure that would enable quality urban expansion is covered under Urban Infrastructure Projects. It would become a chapter in the Single Combined Plan via the Spatial Plan. The NPS-Infrastructure should also reconcile with UIPs, and UADPs.</li> </ul>
Q37	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?	<p>The Future Proof Partnership adopted the Future Development Strategy (FDS) in 2024. As a partnership we think that it should be optional to review the FDS ahead of the 2027 Long-term plans. There is value to using that time and resource to put towards the Regional Spatial Strategy.</p> <p>Council see benefit in still undertaking a Housing Business Assessment which should be based on the new Statistics New Zealand projections. While the FDS has the long-term land supply identified, an HBA can tell us how we are tracking against the supply and include analysis of Fast-track areas that have been scheduled or referred which we know will have a significant impact on our sub-regions land supply.</p>