

15/08/2025

Ministry for Housing and Urban Development  
By email : [GfHG@hud.govt.nz](mailto:GfHG@hud.govt.nz).

Tēnā koe,

**Matamata-Piako District Council (MPDC) feedback to Package 4-Going for Housing Growth discussion document**

Thank you for the opportunity to provide feedback to **Package 4-Going for Housing Growth (GfHG) discussion document**. Please find attached, at Appendix 1, the Matamata-Piako District Council ('MPDC') feedback.

Overall, MPDC considers further clarity is required as to how the proposals in the discussion document apply to Tier 3 authorities. MPDC is of the opinion the proposals should be scalable to the growth that is anticipated. To do otherwise means the cost to undertake the planning work is not proportionate to the anticipated growth. MPDC has recommended in its feedback that careful thought be given to the impact the GfHG will have on Tier 3 authorities.

MPDC also considers the new resource management system needs to better provide for "creating communities". MPDC through consultation with our communities has a clear vision for their community and newly elected members will develop a new vision in the near future. MPDC seeks that the new system provides a path for local outcomes to be recognised and achieved. This could be through spatial plans and the lower level detail that will come through the policy and rule framework.

MPDC strongly supports the improved regulatory weight that will be afforded to spatial plans and the role they will have in providing good local housing and urban outcomes. MPDC considers it makes sense for **each local authority** to identify the key outcomes for the urban areas within their boundaries, as they are more familiar with the areas characteristics. MPDC appreciates the interest to provide alternative development options to those that may be identified in a spatial plans. MPDC considers that while it is prudent to follow a spatial plan, there may be limited circumstances where other development options could be supported. For example where growth has been significantly higher than projected. MPDC considers the limited circumstances would need to be made clear within the Planning Act. Along with very clear guidelines as to how infrastructure would be provided, including through other agencies such as Waka Kotahi, while also not disrupting the processes outlined in the spatial plan.

We look forward to the future consultation processes related to housing and growth, including on proposed exposure drafts, and would welcome the opportunity to comment on any issues explored during their development.

In the meantime should you have any queries regarding this feedback, please contact Fiona Hill, Team Leader, RMA Policy in the first instance, at [fhill@mpdc.govt.nz](mailto:fhill@mpdc.govt.nz).

Ngā mihi



Manaia Te Wiata  
Chief Executive Officer

Appendix 1 – Matamata-Piako District Council Feedback to RMA Reform Package 4 – Going for Housing Growth Programme	
Going for Housing Growth Programme – RMA Reform: Package 4	
Proposal Questions	Description, comment and recommendation
<i>Part B: Urban development in the new resource management system</i>	
<b>Providing for urban development in the new resource management system</b>	
<p>1. What does the new resource management system need to do to enable good housing and urban development outcomes?</p>	<p><u>Description</u></p> <ul style="list-style-type: none"> <li>The discussion document outlines the wide range of cabinet agreed direction that has already been established and states that it is seeking feedback on what else the new resource management system needs to do to provide for good housing and urban development outcomes. It notes that there will be further opportunities to submit on the Planning Bill and Natural Environment Bill when these are considered by the relevant select committee, and the instruments made under them later.</li> </ul> <p><u>Comment</u></p> <ul style="list-style-type: none"> <li>MPDC considers that the new resource management system needs to: <ul style="list-style-type: none"> <li>Provide clear guidance for all community types i.e. Tier 1, 2, and 3 as the discussion document does not make a clear distinction as to which tier the current proposals could apply to;</li> <li>Take a more proactive approach and make better provision for Tier 3, rather than Tier 3 being an exemption to Tier 1 and 2 directions. MPDC believes this would provide for more compatible outcomes and cites the recent draft NPS-GF where GF were subject to Medium Density Residential Standards (MDRS) setbacks across the whole country in locations where MDRS itself was not even applicable; and,</li> <li>Provide for “creating communities.” MPDC following consultation with our communities has a clear vision for their community and newly elected members will develop a new vision in the near future. MPDC seeks that the new system</li> </ul> </li> </ul>

	<p>provides a path for these outcomes to be recognised and achieved. This could be through spatial plans (Refer Qn2).</p> <p><u>Recommendation</u></p> <ul style="list-style-type: none"> <li>• The new resource management system makes clear provision for: <ul style="list-style-type: none"> <li>○ Tier 3 environments. Rather than just being exempted from Tier 1 and 2 requirements, recognise and provide for Tier 3; and,</li> <li>○ Provide for a localised pathway for communities to include key outcomes for urban environments, thus allowing the creation of communities.</li> </ul> </li> </ul>
<b>Part C: Design details of Going for Housing Growth</b>	
<b>Future development strategies and spatial planning</b>	
<p>2. How should spatial planning requirements be designed to promote good housing and urban outcomes in the new resource management system?</p>	<p><u>Description</u></p> <ul style="list-style-type: none"> <li>• It is proposed to have one spatial plan for each region with at least a 30 year horizon and with matters such as the location of strategic infrastructure corridors covering a span of at least 50 years.</li> <li>• Spatial plans are to have stronger weight on regulatory decisions than Future Development Strategies and the list of matters to inform spatial planning are to be expanded.</li> </ul> <p><u>Comment</u></p> <p>MPDC:</p> <ul style="list-style-type: none"> <li>• Considers in order for spatial plans to provide good housing and urban outcomes, it will be necessary for spatial plans to include key outcomes for urban environments. There is the potential for each local authority to identify the key outcomes for the urban areas within their boundaries as they are more familiar with an area's characteristics. The outcomes / principles could be used by applicants when applying for consents or plan changes and in planning assessments when planners consider whether the spatial plan has been given effect to.</li> <li>• Considers the spatial plan needs to be underpinned by robust evidence to ensure areas proposed for development are suitable for proposed activities.</li> <li>• Supports spatial plans to have increased weight in regulatory processes. MPDC considers clauses in the Planning Act should require district plans / designations / plan changes / applications should be required to give effect to a spatial plan.</li> </ul>

	<ul style="list-style-type: none"> <li>• Supports the direction in the discussion document to include infrastructure and implementation plans.</li> <li>• Supports providing flexibility for territorial authorities to focus on parts of the region.</li> <li>• Considers it is important that the spatial plan identifies “no go” as well as “go” areas, including areas subject to natural hazards and identified areas / values of significance. MPDC considers it would be helpful if the list of “no go” areas were specified in the Planning Act.</li> <li>• Suggests that those who should be consulted as part of the spatial plan’s preparation are identified in the Planning Act.</li> <li>• Considers the role spatial plans have in underpinning the Māori economy is recognised within the spatial plan along with protecting wāhi tapu cultural landscapes and customary rights should be recognised.</li> <li>• Considers there needs to be a process to commit all partners (councils and waka kotahi) to implement the land use pattern and required funding for the spatial plan. Under the Spatial Planning Act (SPA) a joint committee was required to be established. The Planning Act does not seem to be heading in the same direction. MPDC considers if there is no requirement to establish a joint committee at the very least there needs to be a mechanism in the Planning Act to require a meeting between the partners in the event a council / private developer proposes to depart from the spatial plan.</li> <li>• Considers once spatial plans have been developed, a refocus of the Fast Track Act is prioritised. The key reason for this is infrastructure planning will be very difficult if projects outside of the identified areas for growth in the spatial plan are enabled through Fast Track.</li> <li>• Considers it would be beneficial if a monitoring report for Spatial Plans was built into the Planning Act. In that way it would be clear if there was the projected capacity still available, or whether it had been developed sooner than anticipated.</li> </ul> <p><u>Recommendation</u></p> <ul style="list-style-type: none"> <li>• The contents of spatial plans are specified in the Planning Act as well as who is required to be consulted in the preparation of spatial plans and the process for preparing a spatial plan. The spatial plan must include outcomes / principles in addition to spatial information and infrastructure requirements.</li> </ul>
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	<ul style="list-style-type: none"> <li>• The Planning Act should require Spatial Plans to be “given effect to” by district plans and/or changes to plans and/or resource consent applications/designations.</li> <li>• Careful consideration be given to the implementation requirements of Spatial Plans including the monitoring of capacity over time.</li> </ul>
<b>Housing growth targets</b>	
<p>3. Do you support the proposed high-level design of the housing growth targets? Why or why not?</p>	<p><u>Description</u></p> <ul style="list-style-type: none"> <li>• The proposal is to use housing growth targets for Tier 1 and 2 councils and incorporate them into the new resource management system. This would require councils to enable enough feasible and realistic development capacity to meet 30 years of demand based on high household projections plus a 20 percent contingency margin.</li> <li>• Whilst councils will need to enable all development in the capacity in their regulatory plan it is not anticipated all the capacity will be immediately serviced by infrastructure.</li> <li>• Currently Tier 3 councils have to provide sufficient development capacity to meet the short, medium and long term demand, with only capacity to meet the short term demand needing to be enabled in an operative district plan.</li> </ul> <p><u>Comment</u></p> <p>MPDC considers based on the information provided, that further information is required before this question can be answered:</p> <ul style="list-style-type: none"> <li>• Clarification is required as to whether the proposal is to apply growth targets to Tier 1 and 2 councils or all councils (refer Qn5).</li> <li>• Clarification is also required as to what spatial areas growth targets are to be applied to. For instance, are growth targets to be applied to urban environments as they are defined in the NPS-UD? Or to other locations?</li> <li>• The high level design needs to recognise what is appropriate for high growth councils is not appropriate for councils who are experiencing low or no growth.</li> <li>• If development is to be plan enabled, but not infrastructure ready a transparent mechanism will need to be developed to ensure developers and the community are aware of the likely development timeframes (refer suggestion in Qn4).</li> <li>• Clarification is required on the relationship between the NPS-HPL and the spatial plan. Will the NPS-HPL specifically exempt land identified for urban development in a spatial plan?</li> </ul>

	<p><u>Recommendation</u></p> <ul style="list-style-type: none"> <li>• Refer to recommendations in Qn4 and Qn5.</li> </ul>
<p>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?</p>	<p><u>Description</u></p> <ul style="list-style-type: none"> <li>• The discussion document raises the need for an agile land release mechanism. The main reason for this is district plans will need to show sufficient development capacity to meet housing targets, but it is unlikely they would be able to service that level of growth with transport and three waters. A mechanism is therefore required to release land when infrastructure is available.</li> <li>• It is suggested that land identified as an indicative for future urban zone can be released without a plan change.</li> </ul> <p><u>Comment</u></p> <p>MPDC:</p> <ul style="list-style-type: none"> <li>• Supports the move towards an agile and streamlined land release mechanism.</li> <li>• Supports the mechanisms outlined in the Waikato Regional Council (WRC) submission and the Taituarā’s submission where land is not released until infrastructure triggers are met and a structure plan / development control plan is approved. WRC suggests a development control plan / structure plan could be approved under the Local Government Act special consultative process. MPDC is of the opinion an alternative option is for a structure plan to be approved through a consent process under the Planning Act. The Taituarā submission refers to a certification process currently used by Dunedin City Council. MPDC agrees a process would be required to ensure the system is implemented consistently.</li> <li>• Considers in the development of the nationally standardised zones, careful consideration will need to be given as to what development can occur on land that has been identified for future growth prior to urban development occurring. The Future Urban Zone provides a useful framework, but more detail will need to be added in the nationally standardised zone.</li> <li>• Considers a mechanism would need to be included within district plans to ensure the outcomes of the development control plan / structure plan are implemented in any subsequent land use or subdivision consent. This could be by way of policies, rules and / or assessment criteria within the nationally standardised zone. By way of example, specific policies rules / assessment criteria could be added to the nationally</li> </ul>

	<p>standardised zones relating to future subdivision or development being in accordance with the approved development control plan / structure plans. The approved development control plans / structure plans would need to be available on the same site as the eplan.</p> <ul style="list-style-type: none"> <li>• Considers a method would need to be developed that would enable the district plan to be changed (i.e. applying the new zone and identifying it is subject to a development control plan / structure plan) once triggers are met and a structure plan approved. MPDC’s preference is for the method to be codified within the Planning Act. Essentially the method would need to specify who / what organisation can change the plan to live zone the land once the triggers are met.</li> </ul> <p><u>Recommendation</u></p> <ul style="list-style-type: none"> <li>• Base the new land release mechanism on the methods suggested by Taituarā and WRC in their submissions.</li> <li>• Codify within the Planning Act who / what organisation will amend the planning maps to apply the new zone.</li> <li>• Include within the nationally standardised zones policies related to implementing the outcomes of structure plans / development controls plans and compliance with approved structure plans / development control plans within the rules and or assessment criteria.</li> </ul>
<p>5. Do you agree with the proposed methodology for how housing growth targets are calculated and applied across councils?</p>	<p><u>Description</u></p> <ul style="list-style-type: none"> <li>• The proposal is for each relevant council to have its own housing growth target but use the same set of data to determine their target, using the 30 year household projections on Te Tūāpapa Kura Kāinga website. The growth targets are to apply to urban environments only.</li> <li>• It is suggested the targets be based on Statistics NZ Statistical Area 2 (SA2) high growth scenario projections. Councils could choose to use a higher projection, but not lower. Councils would also be required to include a 20% contingency margin.</li> </ul> <p><u>Comment</u></p> <p>MPDC considers:</p> <ul style="list-style-type: none"> <li>• Clarification is required as to whether growth targets are only to apply to urban environments as they are defined in the NPS-UD or all urban areas (i.e. not rural).</li> </ul>

	<ul style="list-style-type: none"> <li>• Clarification is also required as to whether housing growth targets are to apply to Tier 1 and 2 councils or to all councils (Para 54 to 57 implies growth targets will only be required for Tier 1 and 2 councils).</li> <li>• If the SA2 approach is used there needs to be a nuanced mechanism that provides for regional / local tools. In Waikato, councils use SA2 data but also apply the WISE land use model which assesses demographic scenarios and provides a more realistic picture of future projections. MPDC is of the opinion councils should not be precluded from using tools like the Waikato Integrated Scenario Explorer (WISE) model.</li> <li>• It is not appropriate to apply high growth projections for urban environments which are experiencing low or no growth. In such cases also applying a 20% contingency margin is not required.</li> </ul> <p><u>Recommendation</u></p> <p>Either:</p> <ul style="list-style-type: none"> <li>• Option 1: Enable councils to choose the most appropriate growth projections (including use of models such as the WISE model) to base growth targets on; or,</li> <li>• Option 2: Reconsider the approach and only apply high growth projections to urban environments within Tier 1 and 2 Councils, whilst enabling Tier 3 councils to choose the most appropriate growth projections.</li> </ul>
<p>6. Are there other methods that might be more appropriate for determining housing growth targets?</p>	<p><u>Description</u></p> <ul style="list-style-type: none"> <li>• The discussion document is seeking feedback on whether there are any other options than using the using the 30 year household projections on Te Tūāpapa Kura Kāinga website.</li> </ul> <p><u>Comment</u></p> <ul style="list-style-type: none"> <li>• Yes, MPDC considers tools like the WISE model are an example of a different method that is used by Waikato councils.</li> </ul> <p><u>Recommendation</u></p> <ul style="list-style-type: none"> <li>• Provide for methods such as the WISE model.</li> </ul>
<p>7. How should feasibility be defined in the new system?</p>	<p><u>Description</u></p> <ul style="list-style-type: none"> <li>• Cabinet has previously agreed that to count towards housing growth targets, capacity will need to be live zoned (enabled in an operative district or unitary</li> </ul>

	<p>plan) and feasible. The discussion document proposes councils would also need to provide sufficient infrastructure-ready capacity to meet the level of growth anticipated by the council. Feasibility modelling will still be important for ensuring councils are enabling development capacity in the right places in the new system.</p> <p><u>Comment and recommendation</u></p> <ul style="list-style-type: none"> <li>• As with many other responses MPDC seeks clarification as to which Tiers this would apply to. MPDC supports that the current NPS-UD makes distinctions between the Tiers around the work required to establish profitability and the same approach needs to be applied to feasibility.</li> <li>• With regard to feasibility, much like the consideration of price efficiency indicators in Qn14, MPDC is concerned at how this would be administered over time, and how changing data is integrated into the model. MPDC considers this proposal needs to be supported with as much definition as possible.</li> <li>• The discussion document states, “<i>Feasibility modelling will still be important for ensuring that councils are enabling development capacity in the right places in the new system</i>”. MPDC considers councils are most likely to provide /enable feasible development in locations that have been part of a long term/spatial plan process, where there has been community buy in to the “right places.” Ad hoc development, outside of agreed long term/spatial plan processes, is likely to be less feasible as there would be no infrastructure planned as discussed further in our response to Qn2.</li> <li>• While MPDC will not comment on defining what may be “feasible” for a developer as this could change at any given time depending on their personal circumstances, MPDC seeks that consideration of other matters that could impact feasibility such as land that should not/cannot be developed is included as part of the feasibility assessment.</li> <li>• Land likely to be precluded from on the basis of feasibility would be land in known/defined hazard locations where mitigation is not likely to be reasonably achieved as part of a consenting process, or locations where private covenants would prevent infill housing and so on.</li> </ul>
<p>8. If the design of feasibility is based on profitability, should feasibility modelling be able to allow for changing costs or prices or both?</p>	<p><u>Description</u></p> <ul style="list-style-type: none"> <li>• There are choices about whether feasibility modelling should be entirely based on current costs and revenues, or if councils can make reasonable adjustments</li> </ul>

	<p>to some or all of these inputs for a proportion of the capacity to be provided, recognising that not all housing will be delivered in the short or medium-term. Whether councils can make adjustments can affect whether capacity is counted in areas where development capacity is likely to become more feasible over time (and therefore reflect market dynamics). It can also rely on increasing house prices, which runs contrary to the policy intent.</p> <ul style="list-style-type: none"> <li>• The discussion document is seeking feedback on what (if any) adjustments should be allowed when councils calculate feasibility as part of demonstrating compliance with housing growth targets.</li> </ul> <p><u>Comment and recommendation</u></p> <ul style="list-style-type: none"> <li>• Whilst MPDC considers it would be helpful to be able to keep track of changing costs and prices, it would be concerned if the design of feasibility was based solely on profit.</li> <li>• MPDC acknowledges in the majority of instances profitability is the driver of development location and type.</li> <li>• However, in a small number of instances this is not the case, for example the provision of not for profit housing or housing being developed by Māori or others on a communal basis. It may be with the increase in the availability of land and reduced consenting processes promised under the reform the instances of not for profit development increases. Therefore, if feasibility was based solely on profitability this would not be helpful to these parties.</li> </ul>
<p>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'?</p>	<p><u>Description</u></p> <ul style="list-style-type: none"> <li>• The current NPS-UD requires capacity to be "reasonably expected to be realised". The discussion document proposes that this is not carried over into the new system, as it has been difficult to interpret and apply. The proposal is to instead include a higher level requirement for capacity to be "realistic", with guidance provided on what factors may be appropriate to consider. This would include aspects such as the existing use of sites, covenants, and site-specific factors (such as slope).</li> </ul> <p><u>Comment and recommendation</u></p> <ul style="list-style-type: none"> <li>• MPDC is supportive of the requirement for capacity to be realistic subject to the provision of guidance. MPDC assumes that the guidance would include matters likely</li> </ul>

	<p>to be covered by the new National Policy statement for Natural Hazards in addition to those listed in the discussion document. MPDC considers there would also be benefit in including land ownership as a matter for consideration as landowner choice may not lead to a zoning being able to be effectively realised.</p>
<p>10. What aspects of capacity assessments would benefit from greater prescription and consistency?</p>	<p><u>Description</u></p> <ul style="list-style-type: none"> <li>• Cabinet has agreed to set prescriptive rules and guidance for how councils calculate matters such as demand and development capacity. This includes reporting requirements. These changes would increase consistency, ensure a minimum level of quality, and make capacity assessments more transparent. Changes may include specifying which standards must be considered in calculations of plan-enabled capacity, setting a specific method for calculating feasibility, and requiring inputs, assumptions, and sample outputs to be included in a mandatory methodology section for capacity assessments reports.</li> </ul> <p><u>Comment and recommendation</u></p> <ul style="list-style-type: none"> <li>• MPDC agrees that there is benefit in the standardisation of how councils calculate matters such as demand and development of capacity. This will provide consistency and will be important when councils have to share data to achieve a joint outcome.</li> <li>• While MPDC does not wish to comment on which aspects would benefit from greater prescription and consistency, MPDC seek recognition that Tier 3 authorities could struggle, due to resourcing to achieve the standards required, or in the alternative their level of growth would not warrant a full blown assessment.</li> </ul>
<p>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?</p>	<p><u>Description</u></p> <ul style="list-style-type: none"> <li>• The discussion document raises the issue of requiring councils to provide infrastructure for the high growth scenario may result in funding and financing implications as more infrastructure is provided than is taken up.</li> </ul> <p><u>Comment</u></p> <ul style="list-style-type: none"> <li>• Yes, MPDC agrees infrastructure planning to meet the ‘sufficient infrastructure ready capacity’ requirement should be based on the most likely growth scenario. For a lot of councils this will be the high growth scenario but for others it will not be. Also within a council area some urban areas will be experiencing high growth whilst other will not be. A most likely growth scenario enables these variations to be taken into account.</li> </ul>

	<ul style="list-style-type: none"> <li>• Requiring councils to provide infrastructure for a high growth scenario when it is unlikely this growth will eventuate will be unaffordable for communities and the investment will not be able to be recouped by development contributions. In addition, underutilised infrastructure is inefficient and results in increased maintenance costs.</li> <li>• In adopting a most likely growth scenario approach for infrastructure there may be a disconnection between land zoned for urban use and the delivery of infrastructure. The spatial plan provides a potential solution to address this issue by identifying locations where new infrastructure or upgrades are required.</li> </ul> <p><u>Recommendation</u></p> <ul style="list-style-type: none"> <li>• Adopt a most likely growth scenario to assess whether there is sufficient infrastructure ready capacity.</li> </ul>
<p>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?</p>	<p><u>Description</u></p> <ul style="list-style-type: none"> <li>• The discussion document advises that councils currently use a range of approaches to assess the amount of capacity that is infrastructure-ready, some of which are more robust than others. To address this, it is proposed to set new minimum requirements for infrastructure capacity assessments to ensure that capacity assessments are informed by robust information. As the differing levels of data and modelling capabilities between councils is likely to make it difficult for requirements to be too prescriptive, one approach could be to include a high level requirement for assessments to be based on modelling if possible, or to otherwise use a robust, transparent evidence-based approach.</li> </ul> <p><u>Comment and recommendation</u></p> <ul style="list-style-type: none"> <li>• MPDC agrees there should be a standard created for infrastructure assessments as this will provide certainty for Council and the development community alike. MPDC also considers there should be flexibility within the standards where parties can opt out due to their status, for example a district being a Tier 3 with no or low growth</li> </ul>
<p>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)</p>	<p><u>Description</u></p> <ul style="list-style-type: none"> <li>• In housing capacity assessments undertaken under the NPS-UD, there is wide variation in the scope of infrastructure assessments. Some consider the whole networks (including local pipes and roads), whereas others only look at trunk mains,</li> </ul>

<p>and trunk mains/key roads, or should it also include local pipes and roads?</p>	<p>plant equipment or both. Some councils also consider serviceability of individual developments but without considering the cumulative ability to service growth.</p> <ul style="list-style-type: none"> <li>• The proposal is to make infrastructure assessment requirements clearer, including setting the level of detail that should be required for infrastructure assessments and requiring assessments to account for cumulative growth.</li> </ul> <p><u>Comment and recommendation</u></p> <ul style="list-style-type: none"> <li>• MPDC recognises both strategic and local infrastructure are required for well-functioning urban environments.</li> <li>• However, MPDC acknowledge that the actual detail for the two types, strategic and local infrastructure may be available at very different times, with the plant items planned as part of strategic, long term plan processes, and local pipes and roads typically planned at the resource consent or subdivision stage. These processes are usually years apart.</li> <li>• MPDC considers that infrastructure ready should certainly show the plant equipment and that triggers should be embedded into development processes to ensure the lower level items are included in an appropriate timeframe.</li> <li>• MPDC also considers that land that is infrastructure ready should also have clear documentation as to where cost fall and that growth is paying for growth if it is outside the Council funded processes.</li> </ul>
<p>14. Do you agree with the proposed requirement for council planning decisions to be responsive to price efficiency indicators?</p>	<p><u>Description</u></p> <ul style="list-style-type: none"> <li>• While housing growth targets are intended to provide more opportunities for development, the discussion documents seeks that the capacity requirements are also informed by indicators of how land markets are functioning in practice. Cabinet has previously agreed to set new requirements that price indicators (such as urban fringe land price differentials) do not deteriorate (and ideally improve) over time.</li> <li>• The discussion document suggests that one way to do this could be to build in requirements that council planning decisions are responsive to a suite of price efficiency indicators, which would be measured and published by the Te Tūāpapa Kura Kāinga. This suite could include measures of urban fringe land price differentials, price-cost ratios and land ownership concentration. These indicators would inform whether council plans are enabling enough development capacity to support</li> </ul>

	<p>competitive urban land markets and, if not, trigger a requirement for councils to enable more capacity in their plans.</p> <p><u>Comment</u>  MPDC does not agree with the proposed requirement of council planning decisions having to be responsive to the price efficiency indicators as a sole measure. This concern is based on:</p> <ul style="list-style-type: none"> <li>• The indicators are only part of the “cost” of building/development, and</li> <li>• Any given individual will have their own price that they are willing to sell/pay and this depends on the economic cycle, and</li> <li>• The indicators will be held on the Te Tūāpapa Kura Kāinga. Clarification is required at what spatial scale they will be applied i.e. at a regional level, city, or town level? The scale the price indicators are applied at could give quite different results, and</li> <li>• How often will they change and how might this affect the planning and decision making processes?, and</li> <li>• Should the indicators show that the cost of housing was too high, which in turn triggers the future release of land, how quickly is this expected to happen? How would the impact on council’s own planning cycle with regard the funding and provision of infrastructure be managed? This is particularly the case if there has been a recent rates cap. It would be unreasonable to expect councils to be able to pivot to supply funding for these type of changes.</li> <li>• It could be that responsiveness to price efficiency indicators is one of many measures considered at the time of decision making, but it should not be the sole consideration, especially given the significant consequence of having to bring more land on line if the price efficiency indicators indicates prices are too high.</li> </ul> <p><u>Recommendation</u></p> <ul style="list-style-type: none"> <li>• The proposed requirement for council planning decisions to be responsive to price efficiency indicators is subject to further review with regard to its likely effectiveness for the reasons cited above.</li> </ul>
<p>15. Do you agree that councils should be required to provide enough development capacity for business land to meet 30 years of demand?</p>	<p><u>Description</u></p> <ul style="list-style-type: none"> <li>• The NPS-UD sets requirements in relation to both housing and business land, but the proposed housing growth targets only apply to development capacity for housing.</li> </ul>

	<ul style="list-style-type: none"> <li>• The discussion document raises the importance of ensuring provision of housing capacity does not crowd out business capacity, proposes that councils should also need to enable enough business capacity in their regulatory plans to meet long term (30 years) demand. As there is no centrally provided demand projections for business land, the document proposes that, unlike housing growth targets, councils would have discretion over the projections they use.</li> </ul> <p><u>Comment and recommendation</u></p> <ul style="list-style-type: none"> <li>• It is not clear from the discussion document if the definition of business land contained in the NPS-UD is to be carried over. This response assumes that it is.</li> <li>• MPDC considers while there could be a benefit in showing future capacity for “business land” in a regional spatial plan, it does not support this should it result in enabled capacity for all the different types of business land. With regard to commercial and retail land, this could incur unnecessary expense given the cyclic nature of the economy where at times shops within the district’s CBDs remain empty and the same spaces fill again when times improve, but overall there is not a significant push outwards. There could be some benefit in providing for industrial land.</li> <li>• MPDC does have concerns at the blanket use of a 30 year term across cities and towns and recommends that a more nuanced approach is made available to reflect the likely circumstances of each locality and its growth rate.</li> <li>• MPDC also seeks clarification regarding the relationship between the NPS-HPL and spatial plans and if land identified in a spatial plan for urban development is exempt from HPL processes.</li> </ul>
<b>Responsive planning</b>	
<p>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?</p>	<p><u>Description</u></p> <ul style="list-style-type: none"> <li>• While the NPS-UD requires local authorities to be responsive to out of sequence plan change requests that would add to development capacity, the discussion documents advises that there seems to have been variable implementation of this policy.</li> <li>• The discussion document raises whether strengthened provisions are required to ensure this occurs, with councils having less discretion to what is considered a significant development as currently required by the NPS-UD.</li> </ul>

	<p><u>Comment and recommendation</u></p> <ul style="list-style-type: none"> <li>• MPDC is concerned at a carte blanche encouragement of “unanticipated development” and “out of sequence” development raises a number of issues such as: <ul style="list-style-type: none"> <li>○ The cost of encouraging such development, for example the provision of significant infrastructure, and</li> <li>○ The possible effects on the overall functionality of the infrastructure network, existing or proposed, that has been designed to support a spatial planning process and was part of a long term plan process, and</li> <li>○ Allowing smaller developments (lifestyle lots) that reduce the effectiveness of the land resource to cater for larger urban developments at a later date, and</li> <li>○ The proposal to remove the provisions requiring development to contribute significantly to development capacity. The discussion document has provided an idea of how a formulae may be developed and there is concern at how applicable this may be across the Tiers.</li> </ul> </li> <li>• MPDC considers that a distinction should be made between “unanticipated development” and “out of sequence” for the purposes of this discussion.</li> <li>• While “unanticipated development” should not be encouraged at all, “out of sequence” development could be considered on a case by case basis subject to certain criteria, including making a beneficial contribution to the growth and development of a district or region.</li> <li>• In the event additional mechanisms were to be provided, MPDC considers any mechanism will need be designed in a way that “out-of-sequence” developments must be: <ul style="list-style-type: none"> <li>○ Within the confines of an existing spatial plan that has been the subject of wide community consultation, and</li> <li>○ Be able to robustly demonstrate the proposal will not undermine the overall outcomes sought by the spatial plan, including existing growth and infrastructure provision, and</li> <li>○ Was able to be subject to the triggers outlined in the answer to Qn4.</li> </ul> </li> </ul>
<p>17. How should any responsiveness requirements in the new system incorporate the direction for ‘growth to pay for growth’?</p>	<p><u>Description</u></p> <ul style="list-style-type: none"> <li>• The discussion document also raises how an “out of sequence” development would interact with the principle of “growth pays for growth”. For example, would a trigger</li> </ul>

	<p>need to be included in the private plan change that would prevent any development occurring until the necessary infrastructure is in place.</p> <p><u>Comment</u></p> <ul style="list-style-type: none"> <li>• At the current time, developers proposing “out of sequence development” or unanticipated development within the MPD utilise “development agreements” to ensure growth pays for growth.</li> <li>• In the new system, MPDC believes there must be a trigger in place to ensure unanticipated development is prevented until such time as it funded by the developer. This will be particularly important as councils funding will already be allocated through a long term plan or future equivalent and tied to a spatial plan.</li> <li>• If councils were required to be more responsive, MPDC considers the mechanisms identified as part of the response to Qn4 must be embedded into any regulatory plan to ensure growth pays for growth.</li> </ul>
<b>Rural-urban boundaries</b>	
<p>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?</p>	<p><u>Description</u></p> <ul style="list-style-type: none"> <li>• Generally at the edge of a town or city there is a boundary between urban and rural zoned land. In some locations rural land can be rezoned through plan change, in other locations there is a hard boundary between the two. The discussion document considers this restricts the competitive operation of land markets.</li> <li>• Cabinet has proposed to remove council’s ability to impose a rural urban boundary in their planning documents. Feedback is also being sought on not allowing policies that preclude leapfrogging. There is also concern that spatial plans could be used to prevent leapfrogging. Cabinet wants the new system to be set up to prevent this while allowing for spatial planning to better enable urban expansion.</li> </ul> <p><u>Comment</u></p> <ul style="list-style-type: none"> <li>• MPDC considers that the best way to give effect to the Cabinet direction to not have rural-urban boundary lines in plans is to place a stronger reliance on an approved spatial plan, with allowance for out of sequence development as discussed in the response to Qn16.</li> </ul>
<p>19. Do you agree that the future resource management system should prohibit any provisions in spatial or</p>	<p><u>Description</u></p>

<p>regulatory plans that would prevent leapfrogging? If not, why not?</p>	<ul style="list-style-type: none"> <li>• Feedback is being sought on not allowing policies that preclude leapfrogging. There is also concern that spatial plans could be used to prevent leapfrogging.</li> </ul> <p><u>Comment</u></p> <ul style="list-style-type: none"> <li>• MPDC understands leapfrogging to be when development occurs on land that is not directly adjacent to an urban area.</li> <li>• MPDC cannot support the proposal that spatial or regulatory plans would not be able to prevent leapfrogging.</li> <li>• The inefficiencies created by leapfrogging would not contribute to a well-functioning urban environment, for example the provision of public transport. MPDC believe that the most efficient use of land is to have new development adjacent to existing development with any urban expansion on the fringes of the built up area.</li> </ul>
<p>20. What role could spatial planning play in better enabling urban expansion?</p>	<p><u>Description</u></p> <ul style="list-style-type: none"> <li>• The discussion document is concerned that there is a risk spatial plans may be used to prevent leapfrogging and is seeking feedback on how the new system can be set up to prevent this from occurring while allowing for spatial planning to better enable urban expansion.</li> </ul> <p><u>Comment and recommendation</u></p> <ul style="list-style-type: none"> <li>• MPDC is concerned that the discussion document while supporting spatial planning is also looking to enable leapfrogging as they consider that spatial plans should not prevent leapfrogging. MPDC is not supportive of unanticipated development (Leapfrogging) in the first instance, with spatial planning being the preferred approach. .</li> <li>• Spatial plans enable efficient urban expansion by identifying the right places, including priority locations, as well as identifying the special places that should be excluded from urban development or any development at all.</li> <li>• Spatial plans will also ensure that development occurs in safe and well serviced locations.</li> <li>• The only circumstance where MPDC considers that this may be acceptable is where there are exceptional circumstances such as the allocation of land within the spatial plan having been used and the demand for housing is so high that other land could be considered for development.</li> </ul>

	<ul style="list-style-type: none"> <li>• Elsewhere in this submission (Qn4) MPDC has submitted on the circumstances where “out of sequence” development could be enabled and had advised methodologies that would support this.</li> </ul>
<b>Intensification</b>	
<ol style="list-style-type: none"> <li>21. Do you agree with the proposed definitions for the two categories of ‘key public transport corridors’? If not, why not?</li> <li>22. Do you agree with the intensification provisions applying to each category? If not, what should the requirements be?</li> <li>23. Do you agree with councils being responsible for determining which corridors meet the definition of each of these categories?</li> <li>24. Do you support Option 1, Option 2 or something else? Why?</li> <li>25. What are the key barriers to the delivery of four-to-six storey developments at present?</li> <li>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?</li> <li>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?</li> <li>28. Is offsetting for the loss of capacity in directed intensification areas required in the new resource management system?</li> <li>29. If offsetting is required, how should an equivalent area be determined?</li> </ol>	<p>As a Tier 3 Authority MPDC has chosen not to submit on these questions that seem more relevant to Tier 1 and 2 Authorities.</p>

<p>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 policy to make it easier to implement?</p>	
<p><b>Enabling a mix of uses across urban environments</b></p>	
<p>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?</p>	<p><u>Description</u></p> <ul style="list-style-type: none"> <li>The discussion document explains the benefits of mixed activities and land uses that are located close to each other. The vision is to enable a greater mix of uses between residential, commercial and community activities in standardised zones, which are anticipated to be introduced through the new system. The document states that in line with the focus of the new system on managing externalities, it is expected where a zone does not provide for specific types of uses, or includes specific controls on activities, this will be based on avoiding or managing the externalities associated with that use.</li> </ul> <p><u>Comment</u></p> <ul style="list-style-type: none"> <li>MPDC supports permitting commercial activities with minimal effects that are considered appropriate in parts of the urban area such as hairdressing businesses. MPDC acknowledges the benefits of having mixed use activities located close to each other to create attractive neighbourhoods. However, MPDC is concerned about clustering of mixed use activities in proximity to each other in residential zones, especially because some commercial (e.g. cafes) and community activities can potentially create adverse traffic, parking and noise effects in relation to residential activities. These issues are likely to be exacerbated if more mixed used activities are clustered in certain areas.</li> <li>It is particularly important that there is consideration at the time of resource consent to address how sensitive land uses can be impacted by certain development e.g. an ongoing 24 hour noise-generating activity next to a house or apartment building. Within the new system, it is likely there will be reduced numbers of resource consents so it is equally important that permitted activities have a rigorous set of standards to manage any adverse effects. Therefore if mixed use is adopted, there should be adequate controls put in place for permitted and non-permitted activities. These controls should include traffic, parking, nuisance effects, and signage to manage the</li> </ul>

	<p>respective effects of residential, commercial and community activities close to each other.</p> <ul style="list-style-type: none"> <li>• In residential environments, important priority is placed on having residential neighbours. To address this, non-residential activities could be limited and capped in certain areas. If there is demand to have more non-residential activities, a higher activity status in the district plan could be required e.g. RDIS or DIS. This could enable a more balanced approach to enabling mixed use activities whilst ensuring that residential zones predominantly catered for residential purposes.</li> </ul> <p><u>Recommendation</u></p> <p>MPDC:</p> <ul style="list-style-type: none"> <li>• Considers there should be adequate controls and standards in place for permitted and non-permitted activities. These controls should include traffic, parking, nuisance effects and signage.</li> <li>• Seeks clarification whether the standardized zones in the new system would apply to all Tier 1, 2, and 3 authorities? What would a standardized mixed use zone look like for Tier 1 and 2 authorities and would this be different for Tier 3 authorities?</li> <li>• Considers whether a rule would be helpful to retain residential coherence between residential and non-residential activities. Seeks further clarification on what is considered a “significant negative externalities.”</li> </ul>
<p>32. What areas should be required to use zones that enable a wide mix of uses?</p>	<p><u>Description</u></p> <ul style="list-style-type: none"> <li>• The discussion document states that some locations such as near trains stations or city and metro centres, may be particularly suited to providing for a wide range of uses. The discussion document is considering whether councils should be directed to apply a zone that enables a wide range of uses in those areas.</li> </ul> <p><u>Comment</u></p> <ul style="list-style-type: none"> <li>• MPDC considers highly intensive areas and areas within city centres are appropriate to enable mixed use activities as these areas typically have high population levels and are considered attractive places to live. A mixed use approach in this location would allow more people to easily access a wide range of amenities and services in these locations, subsequently encouraging people to be less reliant on cars and promote other modes</li> </ul>

	<p>of travel such as public transport, walking, cycling to reach various amenities and services.</p> <ul style="list-style-type: none"> <li>• MPDC would support enabling mixed use activities within the centre of its main townships. For example, the centres of town and its main streets would benefit from more mixed use activities to bring vibrancy and attract more people to these areas.</li> </ul> <p><u>Recommendation</u></p> <ul style="list-style-type: none"> <li>• MPDC supports enabling a wide mix of uses in highly intensive areas and areas within city centres.</li> </ul>
<p><b>Minimum floor area and balcony requirements</b></p>	
<p>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?</p>	<p>As a Tier 3 Authority MPDC has chosen not to submit on this question that is more relevant to Tier 1 and 2 Authorities.</p>
<p><b>Targeting of proposals</b></p>	
<p>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?</p>	<p><u>Description</u></p> <p>The discussion document is asking whether:</p> <ul style="list-style-type: none"> <li>• To largely retain the existing approach in the NPS-UD or whether changes should be made, and</li> <li>• Whether the existing principle of setting the same requirements for all councils within the same urban environment (for example, treating Waipā and Waikato the same as Hamilton) is considered fit for purpose, and</li> <li>• Whether councils should be subject to existing and new requirements, such as specific requirements relating to the location of intensification and mixed-used zones or to meet housing growth targets and undertake development capacity assessments.</li> </ul> <p><u>Comment and recommendation</u></p> <ul style="list-style-type: none"> <li>• MPDC considers there should be a targeted response based on the Tiers and the scale of the urban environment within each council boundary.</li> <li>• For example, MPDC consider that intensification is generally not well suited to small rural towns, particularly as it is unlikely that these towns could be well serviced by a public transport system.</li> </ul>

	<ul style="list-style-type: none"> <li>• At the same time they are supportive of the retention of highly productive soils and consider that consolidation of town centres for example through infill housing is beneficial.</li> </ul>
<b>Impacts of proposals on Māori</b>	
<p>35. Do you have any feedback on how the Going for Housing Growth proposals could impact on Māori?</p>	<p><u>Description</u></p> <ul style="list-style-type: none"> <li>• The discussion document advises that officials have undertaken consultation with Treaty partners and that they are seeking feedback on further impacts on Māori through this consultation process.</li> <li>• The discussion document anticipates positive benefits through increased supply of land while acknowledging excessive responsiveness could dilute the strategic direction of spatial plans, which to date have usually been developed in conjunction with hapū and iwi. The shift towards more centrally determined policy, could function to narrow the scope for Māori engagement in the policy process.</li> </ul> <p><u>Comment and Recommendation</u></p> <ul style="list-style-type: none"> <li>• MPDC recognises that these proposals provide opportunities for iwi Māori, but effective delivery will depend on ongoing meaningful engagement. These proposals could provide: <ul style="list-style-type: none"> <li>○ More urban-zoned land and mixed-use options could improve Māori access to affordable housing and developing papakāinga and kaumātua housing in addition to utilising the NES-P.</li> <li>○ Mixed-use and intensification policies may allow more flexibility for marae, Māori enterprises, and community facilities in urban areas, similar to the opportunities provided in the MPDC rural and rural-residential zones through the MPDC papakāinga plan change.</li> <li>○ Urban and environmental planning integration may support protection of wāhi tapu, cultural landscapes, and customary rights.</li> </ul> </li> <li>• MPDC also recognises that there are circumstances unique to Māori that would need to be addressed including: <ul style="list-style-type: none"> <li>○ The ability of Māori to be able to resource participation in consultation and engagement processes, and</li> <li>○ The unique status and ownership of whenua Māori-such as access to infrastructure, finance, or land aggregation that would require dedicated solutions</li> </ul> </li> </ul>

	<p>as it is unlikely that this would be addressed in nationally standardised policy and rule frameworks, and</p> <ul style="list-style-type: none"> <li>○ How reduced council discretion may reduce local input and Māori engagement at a local level, and</li> <li>○ Environmental impacts from urban growth including infrastructure may affect cultural values and relationships with land and waterways if not well managed, and</li> <li>○ How the use of standardised data may not provide a comprehensive consideration of Māori and allowance should be made for additional consideration of the extensive data base of information that Māori hold.</li> </ul>
<b>Other matters</b>	
<p>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?</p>	<p><u>Comment and Recommendation</u></p> <ul style="list-style-type: none"> <li>• MPDC has concerns regarding the lack of clarity around which types of measures are likely to apply to Tier 3 Authorities, with the discussion document seemingly focused on Tier 1 and 2 locations.</li> <li>• While one approach could be to make Tier 3 authorities exempt from the requirements of Tier 1 and 2 locations, this type of approach does not offer any guidance or direction on the outcomes that should be achieved for Tier 3 locations.</li> <li>• MPDC seeks that improved consideration is given to those areas outside of Tier 1 and 2 locations and how to achieve well-functioning urban environments in these locations in the context of a standardised national approach.</li> <li>• As this would be new consideration MPDC requests the opportunity to review and provide early feedback on this important matter to ensure a better fit for Tier 3 locations within the new planning framework.</li> </ul>
<b>Transitioning to Phase Three</b>	
<p>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?</p>	<p><u>Comment and Recommendation</u></p> <ul style="list-style-type: none"> <li>• MPDC is not a Tier 1 or 2 Authority, however as a Tier 3, and part of the Future Proof group we will be contributing to a process to develop a new HBA.</li> <li>• MPDC considers there is benefit in continuing with the HBA process as part of our future planning process. In addition this information can be used as an important input into the upcoming Spatial Plan process under the new Planning Act.</li> </ul>