

17 August 2025

Going for Housing Growth
Ministry of Housing and Urban Development / Ministry
for the Environment

gfhg@hud.govt.nz

Integrated National Direction Package Four: Going for Housing Growth – Pillar 1

1. Thank you for the opportunity to provide comment on the Going for Housing Growth Pillar 1 proposals and how they could work in the new resource management system.
2. Overall, we agree that there is a need for both careful forward planning and flexibility to adapt to development, which is needed, given the housing affordability crisis New Zealand faces. Through work we have done to date in our district, we can confirm we have sufficient land capacity for planned housing growth, including the 6,400 new houses in-track for delivery over the next 5 years. Our challenges, instead, are:
 - 2.1. In incentivising development to occur in the right places to ensure our communities develop in ways that support people to lead good lives here.
 - 2.2. Ensuring residents rights to 'have a say' in the shaping of the character of the community as we grow are upheld.
 - 2.3. Addressing the growing gaps for needed social infrastructure (for example education and health services that are provided by central government) is aligned with the scale of intended growth.
3. We therefore emphasise that a blanket approach geared to unlocking growth potential across all councils may not provide for good local planning, community building and ensuring our people can have a say in the shape of their local communities. We are concerned that central government has not indicated intention to invest in needed social infrastructure to support the increased housing capacity in provincial New Zealand. Our community is already raising concerns that there are growing gaps in central government social infrastructure (for example education and health services), without taking into account increased demand for such services due to growth; and that the changes

proposed will limit their right to have a say in the shaping of the character of the community as we grow. We are passing this feedback to you, in recognition of the importance of these issues to our broader community.

4. Our responses to the discussion document are provided in Appendix 1. We have provided a summary of our substantive feedback on the proposals below.

We are going for sustainable growth

5. The Kāpiti Coast District is “going for sustainable growth”, with plans for more than \$2 billion in investment in new housing, commercial and industrial builds, and refresh of business and town centres through to 2033.
6. As a Tier-1 high-growth local authority under the National Policy Statement on Urban Development 2020, we embrace the need to plan for and enable growth. However, it is crucial that our communities are able to shape how and where that growth occurs so that we protect what matters to our local communities while accommodating future generations. Enabling communities to shape growth recognises that while we have capacity to accommodate growth within our district, there are some areas not suited for development or where there may be sensitivities (such as natural or cultural features) or unintended consequences of development.
7. We are well positioned to fulfil our district’s role in spatial planning, with a comprehensive package of work created with our communities. This includes:
 - 7.1. Vision Kāpiti - our district’s aspirations for the future,
 - 7.2. Council’s growth strategy *Te Tupu Pai - Growing Well*,
 - 7.3. an ambitious economic development blueprint, and
 - 7.4. plan changes advancing the growth strategy’s ‘growing-up and growing-out’ vision, including Medium Density Residential Standards (MDRS).
8. Our approach to sustainable development aligns to, and supports, New Zealand’s commitment to the United Nations 2030 Agenda for Sustainable Development to *“improve life for current and future generations by addressing social, environmental, and economic sustainable development”*.
9. To be successful in our approach to sustainable growth also requires nationally funded infrastructure to keep pace with a growing population. This includes the provision of infrastructure such as transport, health and education. Our success is also impacted by existing national settings. As a Tier-1 council on the periphery, existing settings are geared towards large metropolitan areas and cities. While we have the same challenges to making well-functioning urban spaces as other Tier-1 councils and cities, we lack the comparative advantage of scale and are regularly and significantly overlooked in the competition for resources.

Getting reform right – the need for balance between current and future needs

10. We acknowledge the concerns of business and the Coalition Government that the current resource management system “drives up costs and slows things down.” We

believe the remedy is getting the foundation instruments for the planning system right. This will provide the legacy for urban form and development for future generations.

11. We recognise the need to strike the right balance between easing restrictions to increase housing and necessary infrastructure, while managing any unintended environmental and social impacts.
12. Council supports the general direction of the proposals in the discussion document relating to urban planning development. However, we consider there are several aspects that require further work to mitigate the risk of imbalance and unintended consequences.

Providing for growth and planning well – the tension between planning well and supporting out-of-sequence developments

13. We support planning well but acknowledge there are challenges in accelerating the pace of housing growth. For provincial New Zealand more attention is needed to address the following challenges:
 - 13.1. There is a growing gap between planning for social infrastructure to support the significant population growth that will accompany housing growth. For example, Kāpiti faces significant gaps in health service provision currently which will exacerbate with the accelerated pace of housing growth. To date, central government has not released any plans that indicate an intention to also accelerate service provision to high growth areas.
 - 13.2. Councils needing to respond to unplanned or out-of-sequence opportunities. For example, new housing developments increase demand for roading and water service provision meaning there is a need for Council to bring forward infrastructure builds. Whilst the recent *Infrastructure Acceleration Fund* provided access to needed funding for new reservoirs in Otaki to support housing growth, this is not a one-off need. There will be ongoing gaps between the timing of new developments coming through and the need to bring forward infrastructure plans to meet development needs – this gap is increasing costs to Council and ratepayers. Further, the cost of needing to more frequently review plans for urban areas is not recovered through development contributions or levies; however, we suggest that it should be.
14. Given the concerns noted in 13.1 and 13.2, we propose Government consider providing councils with funding, financing and economic development tools to support and incentivise developers and existing communities to spatially plan, build and receive development in the right areas – with the objective of achieving well-functioning urban spaces.
15. We welcome proposals on infrastructure, through the new National Policy Statement on Infrastructure, and changes to the development contributions system, as a way to encourage and direct development. However, this work doesn't address the consequences of ad hoc development on existing infrastructure. Even if developers fund new infrastructure, it still needs to integrate into existing council networks, creating extra

pressure and risks. Enabling councils to incentivise development in particular areas would reduce this risk.

16. If 'urban boundaries' or hard zonings are no longer in use, we consider that councils must still have the ability to say 'no' to development when appropriate. Some land is not safe or suitable for development due to natural hazards, scarce resources (highly productive soils, quarrying, water, and other reverse sensitivity activities such as heavy industry), contamination, or matters of national importance (e.g. RMA s.6 matters).

We need to engage and have flexibility to deliver on our communities' needs and preferences

17. Individual councils require flexibility as opposed to a blanket approach to enable our communities to have a say in where and how we grow, ensuring we protect what is most important. Recent examples have demonstrated unintended consequences of applying inflexible national direction locally, including:

- 17.1. Council's recent plan change (Plan Change 2) to introduce medium-density standards (MDRS) into the Kāpiti Coast District Plan to enable our 'grow-up and grow-out' growth strategy. In doing so, we found that while we could meet capacity requirements to accommodate growth, the lack of flexibility in the current MDRS requirements set by central government did not allow us to respond to the growth needs with any sensitivity to our communities and their preferences.

- 17.2. Our recent experience giving effect to the heights and density of urban form requirements of the NPS-UD identified potential significant adverse effects on Māori cultural and spiritual values in relation to development near local marae (refer response to Q35 of Appendix 1 for further detail).

18. These experiences emphasise the need for engagement with local communities prior to issuing national direction, and for local authorities to maintain the ability to engage with their communities and have flexibility to respond to local issues.

Central government commitment and involvement – some areas need clearer, consistent national messaging

19. We are supportive of enabling growth, provided central government provides clear and stable policy direction, effective guidance to implement the new resource management system, and is committed to working with councils as a developing partner. This is fundamental to successfully implementing a consistent and stable new resource management system.

20. While central government sets the overall direction of national policy, councils are the implementers, and our communities experience the consequences. We consider there is opportunity for central government to provide improved support (including funding), guidance (that reflects practical, real-world application) to, and engagement with, councils on matters of key legislation and government policy. We consider a more joined up approach would be of benefit to all.

21. Specifically, we would like to see:

21.1. Practical consideration of how policy and direction setting from central government is implemented. We consider that more comprehensive input from councils is needed to reduce unintended regional and district discrepancy, and expense. Central government often provides broad frameworks, requiring councils to figure out implementation and funding. While this approach allows flexibility, it results in concern about a lack of consistency. We provide the examples below to illustrate this.

- Housing and Business Development Capacity Assessment (HBA) - the guidance provided was not comprehensive enough to provide a standard approach. As a result, concern was raised about councils taking differing approaches, with consultants being engaged by different councils at expense. This led to a lack of clarity, such as how factors like 'development feasibility' were calculated.
- Assessing and planning for sea-level rise – we propose councils would support and benefit from centrally mandated guidance to assess and plan for sea-level rise, including parameters and limits. This would reduce contention, ongoing uncertainty, expensive legal challenges and deferred preparedness.

21.2. Active participation of central agencies managing and funding critical national infrastructure in local spatial planning. This recognises that the provision of nationally funded infrastructure, such as transport, health, and education, is key for delivering on sustainable growth. Councils are well-placed to lead out on and join-up planning requirements for local social services, given growth and assessment of local needs as part of spatial planning work. For example, in Kāpiti, as a district council we are undertaking a local health social needs assessment to inform social infrastructure needs; and are working with Health NZ to jointly develop local health service plans based on this analysis. We are convening hui with our regional and local health service providers to ensure our health ecosystem is connected, and clear on a small set of common priorities for focus across the medium to long term. This work is not subsidised by developers or growth but in our view should be.

22. Councils are under increasing pressure to cut costs and limit rates increases. Co-funding either through extended scope of development levies, or by central government to implement the new resource management system would help significantly. Making the changes outlined in the proposals, gathering reliable evidence and producing new strategic and implementation plans is expensive for councils, especially on top of the recent implementation of the MDRS and plan reviews.

Yours sincerely



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Mayor
Kāpiti Coast District Council



Sean Mallon
Acting Chief Executive
Kāpiti Coast District Council

Package four - Going for Housing Growth

Discussion document questions

	Urban development in the new resource management system	
1	What does the new resource management system need to do to enable good housing and urban development outcomes?	<p>The new system should be accompanied by a clear national and local framework to monitor permitted uses with measures or processes to identify and address any arising issues – including understanding if perverse outcomes emerge – to support a fit-or-purpose system for achieving overall objectives.</p> <p>We appreciate the need to enable housing growth for our people. However, we don't agree with a blanket approach that covers all councils regardless of current settings. Removing regulation and planning input into housing and urban development risks resulting in piecemeal development, expensive infrastructure servicing, and poor long-term outcomes for future communities. Where there is good capacity, ensuring the quality of this growth can be maintained should be a priority.</p> <p>The new system needs to recognise that the built form and functional outcomes arising from urban design are legacies that future communities will inherit. Therefore, the new resource management system needs to retain a focus on good outcomes across all aspects of the environment including social, economic, environmental and cultural outcomes. The new system should recognise that good design (and planning) inputs are required to ensure positive long-term urban development is achieved.</p> <p>We know that components of amenity that affect the health and safety of people and communities, such as sunlight access into homes, and sufficiently sized and orientated private outdoor living areas, are critical to ensuring the mental and physical health of people and for developing a thriving and productive community; and the quality of life delivered by growth at any cost.</p> <p>Also, the cumulative effect on the built and natural environments arising from development must be accounted for in managing externalities.</p>

Design details of Going for Housing Growth		
	Future development strategies and spatial planning	
2	How should spatial planning requirements be designed to promote good housing and urban outcomes in the new resource management system?	<p>Council supports the use of spatial planning to provide the long-term 'glue' to the conflicting pressures arising from urban development and growth. We are supportive of a planning horizon of 30 years with infrastructure corridors and sites out to 50-years.</p> <p>Spatial planning is not a one-dimensional action – it involves local, regional, and national effort. Local spatial planning by nature should be detailed and extensive; regional spatial planning should provide an overall summation of local planning, theming priorities (not duplicating effort or overtaking it); and national spatial planning should set out a higher order overview of planned central government investment on the basis of meeting the priorities signalled through local and regional work.</p> <p>For Kāpiti, we consider that district councils are best placed to lead out on local spatial planning requirements. Our current work promotes good housing and urban outcomes, as well as ensuring stronger alignment with physical and social infrastructure planning. Good spatial planning at local level requires engagement at the local level with developers, communities, partners, and service providers. In our experience this is not possible to do effectively at a regional or national level.</p> <p>We do have concern here that Council would be potentially taking on upfront risk and costs significantly beyond present needs (which due to current funding approaches current rate payers pay for). Complimentary funding and financing tools will need to be put in place to mitigate this.</p> <p>At regional and national levels, we support integrated approaches and priority development areas and the requirement for further details and specificity for supporting infrastructure that allows local perspectives and opportunity costs to be equally considered alongside more urban centric perspectives. For the Wellington region for example, due to the condition of infrastructure priority is placed on addressing issues in the central part of the region due to intensification issues. Whilst the opportunities, costs, and benefits of the western corridor developments fail to be supported – an example been public transport, where regional funding has in turn reduced</p>

	<p>meaning that the most pressing need for Kāpiti residents (ie connection North and South) will not be addressed for another decade.</p> <p>Within this more rigorous framework, how the system will work within the inherent contradictions of planning for 'up and out' while being receptive to the market's call for growth in unplanned areas will need careful navigation, to ensure Council is not left with upfront costs and risks.</p> <p>For Kāpiti, our growth strategy, <i>Te Tupu Pai - Growing well</i>, aims to provide that direction and balance. However, this approach has been challenged by fast-track development occurring not where necessarily anticipated. This in turn provides no regional certainty for planning for region-wide growth capacity and infrastructure. Without this regional certainty or funding how can we expect the market and central and regional government partners to build sustainably for the future.</p> <p>The new system needs to account for what the incentives are for the market to build where long term planning has identified it would be best placed. In some cases where intensification is appropriate, developers may not be brave or familiar enough with more intensive development and are willing to settle for lower yields than would be ideal. The comparative advantages and opportunities of scale Kāpiti presents can't compete with an inequitable system as currently geared (e.g. urban numbers here and now always beat future (unknown) opportunities).</p> <p>Without a complete redesign of existing spatial planning processes, it would make sense to strengthen and expand upon the spatial planning requirements of Future Development Strategies. This should include amending national direction to strengthen and enable local authorities to spatially plan rezoning to meet future urban development demand. However, keeping planning for infrastructure delivery robust is difficult under the current national direction NPS-UD which requires councils to be responsive to unanticipated and out-of-sequence private plan change requests to rezone land for urban development.</p> <p>If complete redesign is on the table, then we would support local planning been completed by district councils; a continued regional overview collated by the Ministry for the Environment; and a national overview also been</p>
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		<p>managed by the Ministry for the Environment.</p> <p>We suggest that better urban development and housing outcomes could be achieved by significantly streamlining local authority consenting processes in the new resource management legislation rather than continuing a process (through the Fast-track Consenting Act) that appoints an external agency to make decisions with long-term implications for communities that are not in-scope for the panel to assess or consider in their determination.</p>
	Housing growth targets	
3	Do you support the proposed high-level design of the housing growth targets? Why or why not?	<p>Yes, Council supports the high-level design in principle. However, as local authorities do not generally build housing, and housing development is subject to factors outside of Council's control, such as market demand, we have reservations about the principle of applying housing growth targets.</p> <p>It is important to recognise current and future needs and to ensure planning for capacity is enabled to meet these. However, the ability for councils to meet the right type of housing and overall numbers is dependent on many factors beyond its control, such as development largely being dictated by the market.</p> <p>While infrastructure can be a key element in constriction or expansion of housing growth, most development remains market-led and dependent on current market demand for the housing typology to be built.</p> <p>Incentives and other tools to help shape and bring forward important infrastructure, including working with developers, could assist in reducing some restriction. However, any such incentives will need to promote development consistent with the long-term spatial plan and contribute to the achievement of its objectives. For the region/district to avoid half-way solutions, incentives should only be used to direct development to preferred areas, not to bolster overall capacity. While a quick and easy out-of-sequence development may seem the short-term answer, over time it risks driving overall greater cost to the community unless all externalities, and their long-term consequences, are accounted for in any decision making.</p>

		<p>With regards to the proposed high projection and added margin for households, currently Kāpiti uses its own data, which traditionally has been a higher growth projection which results in higher margins. Should councils be required to shift towards a new data set, such as StatsNZ, consideration needs to be given as to whether such data is sufficiently robust, and, if not, further work may be required before a nationally consistent process, including typology and population modelling, can be implemented. Any data and consistency consideration would need to be available down to SA2 level as made available by our current provider. This would provide consistency and cost saving for councils.</p> <p>Further consideration would also need to be given to the impacts of more highly inflated figures, and the tension between maintaining competitive land markets, and risk of market failure.</p>
	Providing an agile land release mechanism	
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>There is a balance to be found between the current level of community input into the plan-making process under Schedule 1 of the RMA and finding efficiencies in the plan-making process. Council considers that the current Schedule 1 RMA requirements can be overly complex and time-consuming and would like to see the following changes:</p> <ul style="list-style-type: none"> (a) The requirement that hearings (if needed) are conducted by independent hearing commissioners only. (b) Council retains final decision-making powers on plan changes. (c) Appeal rights are significantly tightened. <p>The new resource management system should not try to streamline the release of land that has previously been identified within current future development strategies or growth strategies, as the underpinning evidence for these sites is generally limited and adequate investigation has not been carried out regarding their suitability for development e.g. natural hazards, infrastructure planning etc.</p> <p>The next level of investigation for the rezoning of land for urban development generally takes place at the beginning of the formal plan-making process. Therefore, should existing identified areas be streamlined in the new resource management system, Council considers there needs to be the option and supporting process for local authorities to change their</p>

		<p>position on the suitability of identified areas as further information is identified.</p> <p>Council notes that paragraph 63 excludes rural and semi-rural areas. Some councils, like Kāpiti, are peri-urban and have pressures across these areas. There is also an underlying contradiction in these areas regarding the potential for future effective urban expansion being eroded by semi-rural (lifestyle) expansion. This is also where opportunities could be for development outside of the preferred development scenarios and locations. For example, Waikanae north is outside current district planning growth areas but is in our growth strategy and is now a fast-track consent area. However, this means that the long-term vision for this area may be affected.</p>
	Determining housing growth targets	
5	Do you agree with the proposed methodology for how housing growth targets are calculated and applied across councils?	<p>As noted, Council has reservations about the concept of setting housing growth targets for the reasons already stated.</p> <p>We support and are happy with the proposed use of StatsNZ data, as our median has been equivalent to StatsNZ's high. With requirements likely to apply StatsNZ's high, we would not be keen to add a further margin by using Sense Partners' high, unless there were strong reasons to do so, or the overall national approach was to use them in lieu of StatsNZ figures.</p> <p>Any methodology must, for efficiency and consistency reasons, draw on central government supporting information for modelling across high projections. By providing centralised knowledge and parameters, councils could focus on actions and insights, rather than needing to expend time and money on establishing a starting point.</p>
6	Are there other methods that might be more appropriate for determining Housing Growth Targets?	No. Council does not believe any approach or method for determining housing targets is useful to appropriately support councils in enabling the delivery of more housing. As noted above, market forces are the arbiter of housing capacity and delivery, and outside the control of councils.
	Calculating development capacity	
7	How should feasibility be defined in the new system?	See below
8	If the design of feasibility is based on profitability, should feasibility modelling be able to allow for changing costs or prices or both?	There is a wide variation in factors affecting feasibility, over and above changing costs and pricing. Standardised factors and ranges of sensitivities are helpful to understand factors and influences of overall feasibility around

		<p>any modelling and projections. However, Council considers that this narrow focus is unlikely to net appropriate outcomes.</p> <p>By including other aspects, such as capacity realisation, as proposed, this will enable differences in locations to be identified, and feasibility to become a straight-line process.</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>No, as there are a range of other factors to be considered when setting any test, including 'realistic'. These include:</p> <ul style="list-style-type: none"> • consistency and acceptable method for assessing capacity • for the more-high-level, the greater the need for national direction to avoid additional costs to councils • that some of the factors be considered in the assessment of feasibility rather than for realisation • realisation is currently a strategic/economic assessment, and • locations consideration factors. <p>It would be useful to get further government clarification across the two factors as to how practices are currently applied and also how realisation or feasibility with regards to infrastructure capacity and availability (timing and sequencing) becomes a factor to be considered in the assessment.</p>
10	What aspects of capacity assessments would benefit from greater prescription and consistency?	<p>Consideration needs to be given as to how infrastructure capacity is accounted for as part of the modelling, based on the range of available data and processes across a range of councils.</p> <p>As noted previously, a centralised process and model/method if available, and able to be used by councils would avoid costs for specialists. Alternatively, providing data robustness and assurances to support modelling process for providing a market assessment and insights would also be beneficial.</p>
	Infrastructure requirements	
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>Yes. As the paper notes, infrastructure capacity cannot be provided across high projection, however councils should have a clear plan and approach as a starting point and planning basis. Alignment with Council's infrastructure strategy, and with infrastructure provided by other providers (utilities, transport, health and education) is also critical.</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>To achieve this goal there is a need for collaboration, discussion, and information sharing between relevant central government agencies and councils.</p> <p>Development of minimum best practice guidelines through the sharing of approaches from councils would result in a more flexible framework, which can account for region, district, and community level differentiation, including accounting for Local Water Done Well. Meanwhile, having central government agencies involved in the process and sharing their own approaches and best practice will enable the development of a shared understanding across projects needs and opportunities.</p> <p>Established clear, shared, and consistent methodologies and data sets that can be a 'single source of truth' would also reduce risk of disagreement and differentiation between central government and local government, and from council to council.</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 treatment plants, pumping stations) and trunk mains/key roads, or should it also include local pipes and roads?	<p>Network assessments cannot simply focus on a portion or section of infrastructure but rather require a full and detailed understanding of the network as a whole. This is because, regardless of its function or responsible owner, the removal, addition, or alteration in one part of the network will have consequences in another. For example, the addition of a development may have minimal effect on a pumping station but may reduce water pressure to houses already fed by that station or the decision to close a trunk road, may result in traffic diversion onto local roads increasing traffic per day and decreasing safety.</p> <p>It should also be noted that any approach will need to consider the impacts of Local Water Done Well and the incoming Development Levy regime.</p>
	Responding to price efficiency indicators	
14	Do you agree with the proposed requirement for council planning decisions to be responsive to price efficiency indicators?	No. While the concept may be a helpful consideration, it should not be an absolute requirement. Changing costs over time could lead to areas and uses a council wants to be protected being pushed out (e.g. future urban land being cut up into large lot/lifestyle blocks).
	Business land requirements	
15	Do you agree that councils should be required to provide enough development capacity for business land to meet	Yes. Business land is an important aspect of zoning requirements and is often competing with housing, which is higher value. Council does consider

	30 years of demand?	that all types of business land should be differentiated, for example heavy industry, light industrial, commercial, for appropriate inclusion in assessments to ensure a balanced and holistic perspective land uses supporting district and regional outcomes.
	Responsive planning	
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>Council opposes a simplistic requirement to be 'responsive' to such developments, unless provided with strict parameters, and right of refusal.</p> <p>There is a risk that this may become an easy way for developers to make councils say yes to projects that might otherwise be subject to conditions or refused, leaving councils required to prioritise these ahead of other planned developments for access to infrastructure spend. Prioritising these projects over others on the basis of economic factors is likely to result in poor urban form and an inability for communities to plan for good growth. From this perspective, requiring councils to 'be responsive' to unanticipated developments in particular, such as private plan change requests to rezone land for urban development that is not identified for future urban development in a FDS or growth strategy, can undermine Council's ability to effectively plan and deliver well-functioning urban environments and associated infrastructure.</p> <p>If this requirement proceeds, then providing Council with additional finance and funding tools to support increased planning and reviews of need should be provided through the new development levy and/or government funding.</p>
17	How should any responsiveness requirements in the new system incorporate the direction for 'growth to pay for growth'?	<p>As noted above, Council has concerns around simplistic responsiveness requirements for unplanned or out of sequence developments. However, Council would welcome any strengthening of a 'growth pays for growth' direction.</p> <p>If this requirement proceeds, then providing Council with additional finance and funding tools to support increased planning and reviews of need should be provided through the new development levy and/or government funding.</p> <p>Clear parameters for costs and ability to ensure the scope of any development fits with local and future expectations and current plans, are necessary. This would ensure a developer cannot go forward with less than</p>

		the capacity and infrastructure reasonably expected for that type of development in a similar locality.
	Rural-urban boundaries	
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>No. We do not support a blanket approach for all councils regardless of existing settings and capacity. Council considers that, as long as sufficient land for urban development is identified in an FDS, there should be no impediment to councils in identifying areas where urban development is not to occur, such as via identifying an urban limit in their planning document. It is unclear what positive outcomes could arise as a result of enabling urban development within any rural environment beyond the areas identified within an FDS for future urban growth.</p> <p>The purpose of identifying urban limits for future growth is to prevent the ad-hoc creation of pockets of urban development throughout rural areas where transportation systems (typically local roads) cannot cope with increased traffic, and to avoid reverse sensitivity effects on primary production activities.</p> <p>There is a tension between well-functioning urban areas and supporting infrastructure and a need to define and support productive land in proximity to our urban areas. This is an efficiency issue, both from the perspective of servicing these ad hoc developments, but also from food supply being close to its primary market.</p> <p>Council's growth strategy <i>Te Tupu Pai - Growing Well</i> balances a 'growing-up, growing-out' strategy that provides for extensive future growth both through intensification and additional greenfield areas growing out from the existing urban extent. These greenfield areas were identified in assessments against natural hazards (especially flooding), infrastructure servicing, and sensitive rural activities. Currently this measured approach that provides more than sufficient capacity in short- medium and long-term is being undermined by fast-tracked development proposal gaining consent outside of these identified areas. For Council, this becomes a double charge on ratepayers for connecting infrastructure through using network capacity sooner than expected.</p> <p>If the requirement to 'be receptive' to out of sequence development is</p>

		retained it needs to be nuanced to the needs of the range of urban areas, not be absolute, with council provided the policy support to say no in the circumstances of natural hazard, reverse sensitivity and scarce resource matters.
19	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>No. As noted in our comments above, appropriate checks, balances and parameters – including where and how - are required to be tested, and decisions made as appropriate.</p> <p>For example, Council's growth strategy, <i>Te Tupu Pai - Growing Well</i> caters for a sustainable, up and out, growth with supporting infrastructure. It also provides for leapfrogging but within clear parameters on where and how. It does not, however, provide for leapfrogging in any location, as doing so would require developers to pick up the cost of connecting infrastructure and undermine the purpose of planning activities.</p>
20	What role could spatial planning play in better enabling urban expansion?	<p>Council considers that careful consideration of the suitability of land for urban expansion is required to ensure well-functioning urban environments are created to serve existing and future communities, to protect the future urban environment from natural hazards, and to ensure any urban development occurs with environmental constraints.</p> <p>Spatial planning will only be effective if future urban growth and expansion can be carefully planned and aligned with infrastructure delivery. Council's growth strategy – <i>Te Tupu Pai – Growing Well</i> – advocates for an up and out approach to growth. Without such planning, poor housing and infrastructure outcomes are highly likely.</p>
Intensification		
	Key public transport corridors	
21	Do you agree with the proposed definitions for the two categories of 'key public transport corridors'? If not, why not?	We agree that consistent definitions should be used between planning instruments and the NZTA framework. However, Council considers requiring blanket growth to these levels is too coarse an approach. For Kāpiti, we do not have any Category 1 or 2 corridors, but do have MDRS three-storey development potential across our urban areas.
22	Do you agree with the intensification provisions applying to each category? If not, what should the requirements be?	No. This needs to be more nuanced to reflect different area characteristics.
23	Do you agree with councils being responsible for	Yes

	determining which corridors meet the definition of each of these categories?	
	Intensification catchments sizes	
24	Do you support Option 1, Option 2 or something else? Why?	For a district like Kāpiti, option one would be a more suitable fit with existing and planned future development density across our urban area.
	Minimum building heights to be enabled	
25	What are the key barriers to the delivery of four-to-six storey developments at present?	<p>Previous HBA assessments have identified the following influential factors:</p> <ul style="list-style-type: none"> • Higher engineering costs for structural requirements • Lower demand for typology in higher rise i.e. apartments • Additional building costs (e.g. - arising from safety systems) • Limited expertise and efficiencies in delivering these developments within a locality • Many existing developers focusing on lower risk, standalone developments, either due to preference or risk aversion. <p>This reinforces our comment above that delivery of housing capacity is mostly market led.</p>
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?	Due to the barriers identified above for buildings of four to six storeys, including a lower demand for this style of building, it is not possible to comment.
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?	Associated costs and risks for enabling more than six storeys include increased infrastructure capacity and provision, uncertainty regarding timing, and probability of building occurring.
	Offsetting the loss of development capacity	
28	Is offsetting for the loss of capacity in directed intensification areas required in the new resource management system?	<p>Yes - Council is supportive of this, providing it is not a 'blanket option'.</p> <p>Such a mechanism could be helpful in supporting up and out development, ensuring maintenance of capacity without unduly impacting on special character areas. However, it should not be a blanket option as this development could be directed from communities that can afford to resist intensification, to communities that do not have the means to challenge.</p> <p>In Kāpiti, such an approach could be used to support areas where character may be an underlying factor e.g. - Waikanae Gardens, directing</p>

		intensification to areas in the growth strategy not yet enabled.
29	If offsetting is required, how should an equivalent area be determined?	Offsetting could be determined by potentially calculating capacity lost from forgoing additional heights in subject areas and requiring for it to be provided elsewhere. This would need to be done at the time of a Plan change, otherwise would require a developer to be able to show where the difference will be provided for. Using the above Waikanae Gardens example, we could more realistically implement at re-zoning time/plan change time as we could increase by 1 additional floor across all metro area to decrease the Waikanae Gardens area to 2 storey.
	Intensification in other areas	
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>No - Council does not consider policy 3(d) is required in the new resource management system, however, should it be included, we note that it requires substantial redrafting in order to reduce misinterpretation and remove risks associated with implementation.</p> <p>For example:</p> <ul style="list-style-type: none"> (a) How far does the 'adjacent' requirement extend into residential zones, and how are height transitions from the 'adjacent' sites to be managed from an effects-based approach for adjoining residential sites? Council considers that the building heights and densities of urban form already enabled by the incorporation of the medium density residential standards is sufficient for 'adjacent' sites. (b) How are building heights and densities of urban form that are 'commensurate with the level of commercial activity and community services' to be determined? And over what timeframe is this to be measured?
	Enabling a mix of uses across urban environments	
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>The following standards would be required to address potential significant negative externalities within noise sensitive environments:</p> <ul style="list-style-type: none"> (a) Effective noise emissions from activities and fixed plant. (b) Hours of operation. (c) Requirements regarding the availability of on-site and on-street parking for customers and delivery vehicles, including heavy vehicles. (d) Road and pedestrian safety for vehicle access points. (e) Light emissions and illuminated signage controls.

		<p>(f) Odour controls.</p> <p>(g) For new areas, reverse sensitivity buffers and provisions with respect to internal noise and ventilation requirements for residential activities and noise-sensitive activities.</p> <p>(h) Some form of landscaping/ urban design requirements.</p> <p>There is also a need to consider any centres hierarchy, which, while flexibly allowing different uses, would also likely need to consider the use and scale of buildings.</p> <p>In providing for mixed use, careful consideration will need to be applied to the tensions between allowing for a range of uses and reverse sensitivity issues between these uses. The points outlined above will go some way to achieving this, but importantly these points need to be applied consistently over time to ensure that uses initially established are do not come under fire over the long-term. In these areas non-residential uses should be seen as first and foremost the most valued land use, to retain access to work and services.</p>
32	What areas should be required to use zones that enable a wide mix of uses?	Council considers it logical that a wide mix of uses should be enabled within Mixed Use Zones. This would ensure that strategic and spatial requirements for the retention of specific land uses, such as the needs of future industrial activities, or future growth areas to deliver housing, are not eroded and undermined. Focusing on mixed use zones for a wide range of uses would also eliminate the likelihood of unintended outcomes, such as significant transportation safety effects.
	Minimum floor area and balcony requirements	
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?	As an overarching comment, Council notes that the concept of 'effects borne solely by the party undertaking the activity' is flawed. This is because most developers will not live within the development being proposed. This means that effects internal to a site, such as providing insufficient outdoor living spaces or balconies, will always be borne by uninvolved third parties - being the future occupants of the site post-development. Council does not agree that requiring minimum liveability requirements within a site, such as outdoor living areas and minimum balcony requirements would make developments infeasible to the degree where intervention by the resource management system can be justified.
	Targeting of proposals	

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?	We do not support a blanket approach to how councils are treated, even within growth categories under the NPS-UD. Council supports the retention of the general approach set out by the NPS-UD, but that it be refined even within categories to allow more tailored approaches where there are significant constraints that prevent the uptake of mandatory intensification within walkable catchments. Council notes the current requirements have led to the 'enablement' of heights and densities within walkable catchments of areas that cannot accommodate growth due to the lack of reticulated sewerage systems – e.g. Paekākāriki. Council considers this to be an example of a poor outcome that undermines the credibility of the NPS-UD, as it drives up developer expectations that cannot be met.
	Impacts of proposals on Māori	
35	Do you have any feedback on how the Going for Housing Growth proposals could impact on Māori?	<p>Council's recent experience in giving effect to the heights and density of urban form requirements of the NPS-UD identified potential significant adverse effects on Māori cultural and spiritual values. The increased mandatory heights in Waikanae and Ōtaki would have resulted in direct overlooking of the Whakarongotai and Raukawa Marae. This would have affected significant cultural practices such as tangi, which Council's mana whenua partners advised would be culturally and spiritually unacceptable. Council was then in the position of having to prepare a 'qualifying matter' under great urgency to address these unanticipated outcomes of the NPS-UD and MRDS mandatory requirements. This situation could have been avoided if central government had consulted with Māori and councils (or with anybody) before releasing the Medium Density Residential Standards and other amendments to the RMA.</p> <p>Council notes that hastily prepared legislative change, including setting national direction without meaningful and broad engagement will almost always result in unintended consequences and poor outcomes for Māori and communities.</p>
	Other matters	
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?	Council considers that the new resource management system needs to provide greater flexibility than the current inflexible NPS-UD/MDRS national direction. Council considers that, given their extensive on-the-ground experience, local authorities and communities are likely to have better a better understanding than central government of the options and methods

		<p>available to provide for greater housing growth. Councils require more user-friendly planning legislation to more effectively plan for future growth via the provision of clear outcomes that must be met rather than rigidly specifying how outcomes are to be achieved. Council would also support careful consideration of the risk of conflict between central government streamlined planning processes and councils' ability to effectively plan, and fund projected future growth.</p> <p>Guidance and better central processes should be developed with key experiences across districts if needed. Ongoing costs need to be balanced with use of consultants where appropriate, processes should be repeatable, and use and application of guidance should be thought through. Assessments and standards, in some cases, may not provide much practical difference, so what other tools and incentives will accompany these to help facilitate and enable outcomes? These should particularly look at motivating the market response, while ensuring current and future well-functioning urban areas, regardless of how they are bought forward.</p>
	Transitioning to Phase Three	
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>Reviewing the HBA could be beneficial as this will provide the latest information and updated projects to inform planning and investment processes.</p> <p>However, Council considers it may be premature to complete further work on the FDS due to ongoing and forecasted work at a regional and national level.</p>