

Medium Density

Date Requested: 12 August 2025

Date Provided: 14 August 2025

Request

I note from a previous position paper I understood that when the IHP was in session they could not hear argument against medium density because at that stage only arguments about high density could be heard by the IHP. Is that correct?

I have down that medium density was to go live on 23rd September 2022.

Council Response

Every Teir 1 Council was required to apply the MDRS in accordance with sections 77G and 80E of the RMA. The IHP make the requirements of the Act quite clear in their recommendation report, where from page 26 of [Part 1 of their report](#) they discuss the purpose of PC14. They state “[79] The primary purpose of PC 14 is to incorporate for the first time the MDRS, and to give effect to NPS-UD Policy 3 and 4 in relevant residential and non-residential urban zones... [82] In addition to the mandatory requirements, the Act enables a Council the discretion to include additional matters described in sections 77G and 77N as being to...(e) modify the requirements set out in the MDRS or NPS-UD Policy 3 to be less enabling of development **provided they are a QM.**” (emphasis added).

Regarding the date of when MDRS took effect, officers sought approval to notify the plan change on 8 Sept 2022, but this was rejected by Council. The government appointed an investigator, culminating in further changes to the proposal, which was then formally notified on 17 Mar 2023. Because the updated proposal included a city-wide qualifying matter (Sunlight Access), this nullified the application of MDRS. It meant that MDRS has only been in effect, in-part, since the first residential zones were decided in Dec 2024, with it taking full effect after the Minister rejected the Sunlight Access qualifying matter in Jun 2025.