

## **Appendix 1: Detailed Christchurch City Council Submission on Going for Housing Growth**

### **Urban development in the new resource management system**

**Question 1:** What does the new resource management system need to do to enable good housing and urban development outcomes?

Please refer to our covering letter comments on housing supply and housing quality. In addition, we make the following comments.

In answering this question, we will not focus on housing supply, as it is already well established that having sufficient development capacity is a fundamental of enabling good housing and urban development outcomes.

In any new resource management system, housing, at a minimum, must meet basic housing needs, such access to sunlight, adequate internal spaces, and sufficient private outdoor spaces. Often a critique of councils is that they are requiring 'gold plated' housing quality. However, aspects such as adequate private outdoor space and tree canopy cover, should not be seen as 'high quality' but rather fundamental requirements of the new system.

For example, public open space provision can only go so far to providing outdoor spaces for people to move, play, recreate, enjoy the open air and environment. When housing developments fail to deliver these essential qualities, it raises the question of who bears the responsibility and cost for providing them. In our experience, this burden frequently shifts to councils, placing additional pressure on them as they attempt to compensate for these deficiencies.

However, often there are both fiscal and physical barriers to providing a sufficient level of open space to offset the impacts of more intensified populations, buildings and impervious surfaces. The apparent shift in focus on 'the enjoyment of property rights', has the potential to give rise to cumulative effects on the broader urban environment. This is exemplified in Christchurch with the loss of tree canopy cover resulting from increased intensification in our urban environment. In recent years we have seen a reduction in our tree canopy cover, largely resulting from developments seeking to maximise yield on private sites beyond permitted activity standards.

### **Future development strategies and spatial planning**

**Question 2:** How should spatial planning requirements be designed to promote good housing and urban outcomes in the new resource management system?

Please refer to our covering letter for comments on spatial planning.

### **Housing growth targets**

**Question 3:** Do you support the proposed high-level design of the housing growth targets? Why or why not?

In principle, we are supportive of high growth targets; however, our support is contingent on these targets being accompanied by flexibility in Policy 3 to allow councils to manage growth

strategically and in the most appropriate locations as determined through an evaluation (i.e. RMA section 32) process.

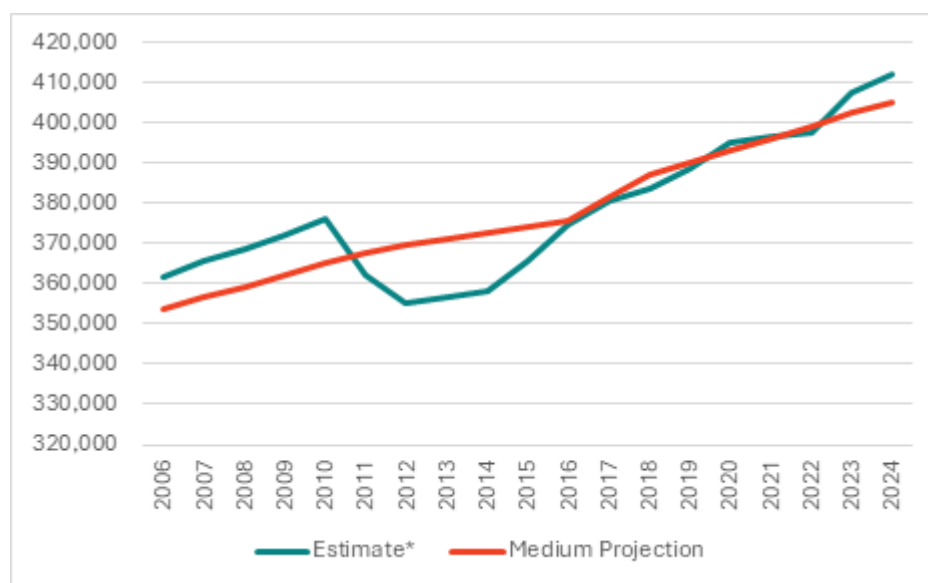
Our experience in managing the costs of unplanned growth and pressures to provide and maintain infrastructure services to less appropriate areas, is the basis for our position that blanket enablement of development, rather than it being directed to the most appropriate locations, does not lead to well-functioning urban environments (please also see comments in our covering letter). If blanket enablement was to be applied with the proposed high growth targets, we see this to be problematic for the following reasons.

The proposed high growth +20 percent benchmark is, in a Christchurch's context, a +137% contingency on actual growth. It projects an unrealistic growth pattern that is unlikely to be achieved as Christchurch has consistently tracked against a medium growth projection.

The latest medium growth projected household demand for 30-years is a total of 27,600 households (2023 StatsNZ, 2024-2054 projection), while the latest high growth projection for this period is 54,700 households (2021 StatsNZ projection). A 20% contingency on top of the high growth projection would result in 65,600 additional households. This equates to an increase almost 2.4 times over actual household growth demand.

If blanket enablement was to be applied, we would be more supportive of a requirement to live zone for actual growth projections, plus a 20% contingency. For Christchurch, this would mean that zoning would need to provide for a scenario of 33,200 additional households, rather than 65,600. It is important that spatial planning is undertaken on a regular basis to ensure there is not insufficient capacity. A 20% contingency on the projected growth is still significantly within the range of variation between historic actual and projected growth, which council observes has a variation of only 0.1%, on average.

Below provides an overview of how household growth projections have historically compared against estimated actual population, utilising data from 1991 until 2018, to illustrate alignment with medium growth projections:



Please also refer to our covering letter comments on growth paying for growth.

## Providing an agile land release mechanism

**Question 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?

We see that spatial plans should be the mechanism to direct the most appropriate release of land. Whether a streamlined process provides any significant benefit will depend on the level of detail provided in the spatial plan. If the detail is not sufficient, there could be a gap in the level of detail between the high-level nature of spatial plans and details required for subdivision consents.

For this to be successful, there will need to be an agreed level of detail in spatial plans, and a level of confidence that all the major issues, typically dealt with through a rezoning process, have been adequately addressed through the spatial planning process. If not, this could make subdivision consenting processes more complex and onerous as a result of unresolved issues at this stage.

In terms of brownfield and greenfield development, we see the issues to be similar. However, it depends on the scale of land use change being proposed. For example, a streamlined process may be more suitable for smaller block development proposals as compared to major brownfield – such as the case of Sydenham.

## Determining growth targets

**Questions 5 and 6:** Do you agree with the proposed methodology for how housing growth targets are calculated and applied across councils? Are there other methods that might be more appropriate for determining Housing Growth Targets?

Council agrees with the proposed methodology for how housing growth targets are calculated in terms of applying across councils.

However, consideration needs to be given as to how Housing Growth Targets can be shared, or in some instances required across territorial authorities to better achieve a well-functioning urban environment from a sub-regional or regional perspective. Further, to more effectively achieve the objectives of other national direction, such as the National Policy Statement for Highly Productive Land.

For example, one spatial area may have historically observed high growth and StatsNZ will continue to project high growth for that area. The current NPS-UD Housing Capacity Assessment requires sufficient housing supply to meet demand as projected for each territorial authority. It is a predict and provide model, but one which can perpetuate a dispersed urban form. There may be other more appropriate (well-functioning) locations outside of a territorial authority area to meet demand generated from that territory but, in practice, Councils are unlikely to essentially ‘give up’ demand and opportunities for district growth. The setting of housing targets requires fluidity but also potentially clearer directives as to how territorial authorities work together to ensure the optimal allocation of housing across growth area.

## Calculating development capacity

### **Question 7:** How should feasibility be defined in the new system?

We have reservations about the suitability of the outputs from feasibility modelling as a measurement tool for sufficiency. In our experience, this method is unhelpful for tracking how a District Plan is providing capacity, as there is a lack of comparable outputs across review cycles. This is due to the ever-changing pricing changes of inputs into feasibility models and the reality that a model output is only tied to when cost inputs are derived; it is a snapshot in time.

We seek to avoid the current scenario where previous feasibility modelling shows ample capacity well beyond targets, while current feasibility shows a substantially less degree of feasibility, despite a large quantum of housing enabled by the zoning of areas for intensification (i.e. Policy 3 NPS-UD areas). This forces Council to state “one number” to meet the HCA sufficiency requirements that within six months to a year, could be remodelled to be different (higher or lower). It risks producing an artificial gap in capacity, which would simply not be present if build costs reduced, land prices increased, or sale prices increased.

We consider that a more comparable feasibility approach would be an adapted plan-enabled approach. Plan-enabled capacity is based on a calculation of the maximum total number of units enabled by the District Plan. This is typically a large sum, which can be groundtruthed through either accepting a proportion will be commercially viable at any given time (say 10-15%) and/or observing full block and/or site development yields (as undertaken in each HCA we have undertaken).

A form of a Plan-enabled approach to the feasibility assessment provides a better opportunity to benchmark zone provisions to evaluate how these are ultimately influencing the delivery of housing units and the effect that changes to bulk and location controls has on total yield. Further, a Plan-enabled approach can take into account capacity yielded through infill or vacant lot development, brownfield sites and greenfield developments, which often don't meet the feasibility threshold but still realise development.

In summary, we continue to support the need for a HCA with a component part focused on commercial feasibility. However, Council is of the position that the measure of feasibility could be broadened.

### **Question 8:** If the design of feasibility is based on profitability, should feasibility modelling be able to allow for changing costs or prices or both?

We reiterate the limitations of feasibility modelling to determine capacity sufficiency. However, if pursued, we would be supportive of allowances for changing costs and prices over long-term projections.

However, care is needed to ensure the benefits of standardising feasibility are not lost through manipulation of inputs. It would be preferred if Government centralised the modelling of future infrastructure costs and building costs, while it is likely more appropriate to model changes to dwelling prices at the local level and to leave this to councils to determine.

**Question 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’?

Our suggested approach to Plan-enabled capacity could serve to also address this question. In practice, our Housing Capacity Assessments already applied ‘realistic’ yields to full block development scenarios and reported as “reasonably expected to be realised”.

**Question 10:** What aspects of capacity assessments would benefit from greater prescription and consistency?

Additional aspects of current NPS-UD criteria that could benefit from greater clarity and specificity include:

- Urban environment
- Well-functioning urban environment

Accepting that Government intends to change how the rural interface is managed, Council has found that the ‘urban environment’ definition has been one of the most contested parts of the NPS-UD. The main area of contention appears to be between the phrases ‘intention’, ‘predominantly’, and ‘housing market’. The issue arises by when and by whom *intention* is made against a generalisation of ‘predominantly’. Read together, this is a fairly broad, contestable criteria.

We consider that tracking a housing market spatially is fraught. Technically (as we have experienced applicants arguing), if an individual seeks a family home within a commutable distance from the commercial centre of a sub-region, then that whole sub-region could be considered a part of one housing market. This artificially inflates the intended scope of the NPS-UD, resulting in unproductive debates between councils and applicants. The definition of urban environment could be amended to include:

- Links with Territorial Authority published growth plans;
- Sufficiency of specific urban amenities;
- Sufficiency of public transport accessibility;
- Specificity of the minimum density to be deemed part of the Urban Environment (similar to ‘urban environment allotment’ definition in s76(4C) of the Act);
- Land use / zoning that is primarily focused on residential activities;
- Area encompassed by a relevant residential zone;
- National Planning Standard zone equivalents.

The ‘well-functioning urban environments’ definition links to Policy 1 of the NPS-UD, which is presumably changing through this process. The policy is very broad and has been used to argue out-of-sequent plan change outcomes via Policy 8. This is an unhelpful association for a decision-making criteria for plan changes.

In our view, the primary change needed to the definition is to ensure that it is centred within an urban environment context, rather than other interpretations that enable rural re-zonings, whilst having the principal directive focused on accessibility (sub-clause (c)), rather than one of the other criteria that have the same weighting.

### **Infrastructure requirements**

**Question 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?

In short yes and this is our approach to infrastructure planning and investment. Whilst we consider it is important for all requirements under the future NPS-UD to use the same growth projections to avoid unrealistic market expectations, the growth projections that a Council uses to inform its infrastructure planning and investment is a matter for the Council. In practice, Council through its LTP has adopted a medium projection but through its infrastructure planning, it has undertaken sensitivity tests of other growth projections.

Please refer to previous commentary on housing bottom lines and the effects on infrastructure.

**Question 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?

We believe regular monitoring and evaluation, similar to what has been happening through Housing and Business Development Capacity Assessments and the Infrastructure Strategy, is the most suitable approach to ensuring quality.

**Question 13:** What level of detail should be required when assessing whether capacity is infrastructure-ready? For instance, should this be limited to plant equipment (e.g. treatment plants, pumping stations) and trunk mains/key roads, or should it also include local pipes and roads?

Our position is that for the purpose of addressing high level housing and business sufficiency targets, infrastructure ready capacity assessments should be kept high level. One approach could be to only identify development that is constrained (due to a lack of infrastructure) beyond a 10yr or even 20yr period, and/or there is no likely feasible or viable infrastructure solution (to enable the land development).

Council encourages the Government to provide more direction as to the scale of infrastructure constrained development it is concerned with. Where a Council can demonstrate a significant surplus of housing capacity and no major (i.e. trunk or catchment) infrastructure constraints for example, how important and necessary is it for Councils to identify infrastructure ready development to any finer scale (i.e local pumps stations and pipes)?

### **Responding to price efficiency indicators**

**Question 14:** Do you agree with the proposed requirement for council planning decisions to be responsive to price efficiency indicators?

No. We consider that such indicators have minimal benefit. In the scenario where an abundance of capacity is provided, it is difficult to see what additional knowledge is gained from such metrics and what additional land use planning controls can do in response, acknowledging that the NPS-UD is already directive about housing in the 'right' places and proposals seek to continue this approach. Additionally, there may be limitations to this proposal due to restrictions under the Ratings Act when a landowner elects not to share their information.

### **Business land requirements**

**Question 15:** Do you agree that councils should be required to provide enough development capacity for business land to meet 30 years of demand?

Yes. A 30yr timeframe aligns well with residential projections and in our experience is reasonable in terms of investment cycles. There are too many uncertain market factors for any longer period and any lesser period could contribute to market deficiencies. We support the use of localised business demand projections.

### **Responsive planning**

**Question 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?

Please see comments in our covering letter on our concerns to enable unanticipated or out-of-sequence developments.

If the Government is inclined to pursue such in the new system, we see that the following should be considered regarding any changes to Policy 8:

- Greater specificity on 'significant' – focused on delivery of housing over which time horizon and proportionately how many houses were to be delivered. For example, this could be a quantum of housing that represents 10% of total projected (actual) household growth over the long-term horizon (10-30 years).
  - The examples provided in paragraph 84 are not supported. The criteria are likely only met through greenfield uplift, rather than changes to urban zoning, as MDRS and other targeted intensification elements of the current NPS-UD and proposed changes herein would likely easily address any urban capacity constraints.
- More clarification on the 'particular regard' element of 3.8(2) in consideration of Policy 8 – this is currently seen in an RMA planning construct through a consenting lens, rather than whether a proposal is given higher prioritisation than other plan change applications.

Other prospective options include:

- SPP-type approach
- Modification of the Schedule 1 criteria for private plan changes, such as potential automatic council adoption under specific criteria
- Co-financing regime
- Proactive or concurrent modification of strategies designed to facilitate growth in these areas (e.g. Three Waters, parks planning, roading, etc.)

- Changes to ‘urban environment’ and ‘well-functioning’ as detailed within this submission.

**Question 17:** How should any responsiveness requirements in the new system incorporate the direction for ‘growth to pay for growth’?

Please see comments in our covering letter on ‘growth paying for growth’.

### **Rural-Urban boundaries**

**Question 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?

Spatial planning should play a central role in managing urban expansion by identifying where and when growth should occur, based on infrastructure capacity, environmental constraints (including productive soils), natural hazard risks, and community aspirations.

While flexibility for expansion is important, encouraging uncoordinated greenfield development can result in additional costs associated with infrastructure, and the loss land for productive activities that support the urban environment e.g. horticulture and/or reverse sensitivity effects. It may also undermine the effectiveness of spatial planning, and its ability to align housing, transport, and infrastructure investment.

In designing the new resource management system, we see that there are potential benefits from developing a set of nationally standardised zones that are appropriate to meet the needs of both urban and rurally located people and allow for the specific environmental context.

Further to this, any clarity is welcomed, with an emphasis on the difference between so-called ‘hard’ and ‘soft’ boundary mechanisms. For example, there may be other qualifying matters or other NPS regulations (e.g. highly productive land) that still prevent urban expansion in the absence of any other boundaries.

**Question 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?

We do not support the future resource management system prohibiting provisions that would prevent leapfrogging. ‘Leapfrogging’ policies ensure more efficient expansion of infrastructure, reduced reverse sensitivity, reduced conflict with rural commercial activities, and better transport outcomes.

**Question 20:** What role could spatial planning play in better enabling urban expansion?

Please refer to our covering letter on comments relating to spatial planning and greenfield enablement.

### **Key public transport corridors**

**Question 21:** Do you agree with the proposed definitions for the two categories of ‘key public transport corridors’? If not, why not?



Yes, however the application of the Spine definition is quite targeted for Christchurch and in some cases, it does not align with areas commensurate with 'accessibility' as intended to be applied under the proposed reversal of Policy 3(d). Regardless, this may coalesce together with a wider Policy 3(d) response. The application of Primary corridors follows the same approach that the Council progressed with its Low Public Transport Accessibility Area (LPTAA) as part of its IPI process. Key to the suitability of these two approaches is how walkable catchments are drawn.

As referenced in our covering letter on intensification along strategic transport corridors, the use of the One Network Framework (ONF) is potentially problematic as it could create a scenario whereby Council is required to proceed with a plan change every time roading classifications are altered due to changes to public transport. The ONF is a dynamic qualitative framework that appears to be intersecting with a statutory plan making process, which work in parallel from each other. The ONF is also still in development.

Council wishes to avoid the scenario where annual plan changes are required, or where ONF changes in lieu of a plan change and conflicts arise through the consenting process. This would be helped by setting a clear benchmark that utilises ONF as an input into considerations.

**Question 22:** Do you agree with the intensification provisions applying to each category? If not, what should the requirements be?

No comment.

**Question 23:** Do you agree with councils being responsible for determining which corridors meet the definition of each of these categories?

Yes, we agree that councils should be responsible for determining these routes, acknowledging that Territorial Authorities have the local knowledge of the network.

Notwithstanding this, we note that any regulation must be specific about the nature of each service to avoid unconstructive debate through the plan making process.

### **Intensification catchment sizes**

**Question 24:** Do you support Option 1, Option 2 or something else? Why?

At this stage, without undertaking mapping of the 400m and 600m buffers, we do not have a preference between the options. However, we note that the future NPS-UD must be clear as to the criteria necessary to expand such minimum catchments and the origin point of where catchments are drawn from.

### **Minimum building heights to be enabled**

**Question 25:** What are the key barriers to the delivery of four-to-six storey developments at present?

The key disincentives for four-six storey development are: market choice, demand and the Building Code.

The Christchurch housing market still provides for significant housing choice, meaning that other typologies are more attractive given their availability in accessible locations. There is also an

attractiveness in the market for fee simple title and the avoidance of body corporate regimes. This appears to be driven by both market perceptions and the lack of good examples historically.

From a residents' perspective, there is also likely to be low demand for residential dwellings in 4-6 storey developments. The [Life in Christchurch survey](#) in 2023 found that 25% of residents would consider living in a "low-rise" apartment building (3-4 stories), and only 19% would consider living in an apartment building (4+ stories).

In terms of Building Code requirements: any development at three storeys or more requires specific engineering design, including geotechnical and structural requirements. From four storeys and above, most buildings are not commercially feasible without a lift due to Code requirements. From five storeys and above, specific fire regulations apply to provide pressure head to upper floors. From six storeys and above, specific engineering requirements are highly likely, including dampers, eccentric bracing frames, or buckling-restrained braced frames, structural support for secondary building elements, and the strong likelihood that sprinkler systems are required for any building 25m or taller. All these requirements come at considerable cost.

If Aotearoa New Zealand is seeking to continue an upward trajectory, there must be considerable efforts placed into standardising engineering solutions at height. However, Council also understands that pragmatism is required to reflect localised issues, such as earthquake vulnerability and land subsidence, meaning that standardisation may only provide limited benefits.

**Question 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?

No, in Christchurch's context, we consider that such a change will not deliver material change to what is likely to be delivered.

The intensification plan change for Christchurch City Council considered the commercial viability of six storey development or greater, concluding that commercial feasibility only began from 12-storeys or greater and only within a very localised area around the City Centre zone. Accordingly, that plan change adopted a permitted building height of 39m or 12-storeys. Evidence was also presented to show how a wider application to enabling a greater height would also cause detrimental economic effects within the CCZ, taking away the potential for agglomeration benefits and the 24 hour economy that may come from mixed use apartment typologies within the CCZ.

Given that this plan change was in 2024, it seems premature to now re-consider operative zoning controls and associated evidence.

**Question 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?

In many cases, such a requirement would have little impact to what gets delivered as such developments would still be unfeasible and unappealing to the market, as well as causing negative economic effects within the CCZ.

## Offsetting the loss of development capacity

**Question 28:** Is offsetting for the loss of capacity in directed intensification areas required in the new resource management system?

No, this approach seems unnecessary when significant housing bottom lines will already be required. There seems little benefit to having an offsetting requirement when this is already a proxy outcome of bottom lines. We see that there should simply be a greater focus on ‘other’ qualifying matters.

**Question 29:** If offsetting is required, how should an equivalent area be determined?

It may simply be finding an area that matches in terms of both operative zoning and, on balance, similar characteristics as the affected area in terms of the requirement to intensify. The ‘on-balance’ criterion is likely needed as those areas that completely align are likely already required to be intensified. Additionally, we see that other factors such as ‘access to public transport’ should also be considered when determining ‘equivalent areas’.

However, we reiterate the limitations with such an offsetting approach as the Housing Growth Targets would already provide for significant enablement.

## Intensification in other areas

**Question 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?

In the absence of MDRS, such a future direction is likely necessary, with some exceptions and caveats:

- MDRS applies across almost every metropolitan urban residential area in Aotearoa New Zealand – changes to Policy 3(d) appear to be premised on MDRS being removed via a plan change from these areas.
- Use of ‘housing demand’ is a concern as this is highly subjective and may be contrary to achieving the outcomes of high accessibility.
- Its utility is dependent on the degree of standardisation of zones.

Given the above, such an equivalent policy is likely only of much use to Auckland and Christchurch, subject to proposed changes to the Act for the MDRS opt out being enacted and respective councils’ completing the opt out process. Given that every other Tier 1 Council, plus Rotorua, have applied MDRS and Policy 3 (as applicable), such Councils should be exempted from any future requirements to relitigate the application of Policy 3 for a period of time.

## Enabling a mix of uses across urban environments

**Question 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?

We do not consider there to be any 'need' for additional controls beyond what is already in place under our District Plan. Our plan currently provides for a range of non-residential activities to establish within the urban environment, with provisions to manage negative externalities. For example, to manage high traffic generation, light spill, noise, signage, residential cohesion, disturbance and safety through controls on hours of operation.

Our plan framework also manages economic effects on commercial centres, based on breach of scale, and to realise agglomeration benefits through the concentration of activities in centres (being directives under the National Planning Standards and NPS-UD). This approach also supports objectives related to the efficiency and effectiveness of infrastructure including public transport services.

The current requirement for Councils to review and monitor the effectiveness of its District Plan, is sufficient to identify any issue or deficiency in the provision and management of such activities. Further in response, it should be established through an evidence base and section 32 evaluation, that a different approach is more appropriate.

**Question 32:** What areas should be required to use zones that enable a wide mix of uses?

Please refer to our covering letter on comments on wider mixed-use areas and our concerns with enabling greater standardisation of the mixed-use zones.

Additionally, such an approach appears contrary to the monitoring requirements of the NPS-UD, which requires 3-yearly evaluation and responsive planning accordingly. It is not apparent to Council that the current system does not adapt to changing community needs (as stated in the discussion document) as the inverse approach is envisioned through responsive planning controls of the current NPS-UD. Therefore, the status quo approach is favoured over the proposed change.

The discussion report commentary is premised on District Plans not able to be adaptive to community and business needs. However, the current NPS-UD provides precisely this mechanism: a detailed evaluation report is required every 3 years and District Plans must be updated to align with housing and business needs.

### **Minimum floor area and balcony requirements**

**Question 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?

Other standards that could be considered are as follows:

- Site density, noting the difference between this and minimum site size via subdivision controls
- Road boundary setbacks (MDRS associated)
- Storage requirements
- Outlook space (MDRS associated)
- Windows to the street (MDRS associated)

- Ground floor habitable room
- Garaging / parking locations
- HVAC locational requirements

Please refer to the covering letter as to why we think these are important for housing quality, particularly with increasing intensification.

### Targeting of Proposals

**Question 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?

Requiring wider urban areas to work together to process HBA matters is appropriate as it is likely reflective of the complete housing market and economic concentration of a sub-region. The current split of responsibilities between Tier 1-3 councils seems appropriate.

### Impacts of Proposals on Māori

**Question 35:** Do you have any feedback on how the Going for Housing Growth proposals could impact on Māori?

We recommend engaging with Treaty partners to understand how the Going for Housing Growth proposals could impact on Māori.

### Other Matters

**Question 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?

No further comments.

### Transitioning to Phase 3

**Question 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?

We do not see any issues with councils needing to prepare or review their HBA evaluations given that the HBA is intended to be complete in Quarter 2 of 2026, which is before the new RMA replacement Bills are enacted.

We would support a suspension of the responsive policies in the NPS-UD that seek to enact the outcomes of any HBA report. This seems unnecessary considering the requirement to fully transition to a new planning system and is consistent with the 'Plan stop' proposals.