

Attachment B: QLDC Submission to the MHUD on 'Going for Housing Growth' Discussion Document

15 August 2025

gfhg@hud.govt.nz**SUBMISSION TO MINISTRY FOR HOUSING AND URBAN DEVELOPMENT ON THE GOING FOR HOUSING GROWTH DISCUSSION DOCUMENT**

Thank you for the opportunity to present this submission on the Going for Housing Growth discussion document. The Queenstown Lakes District Council (QLDC) is largely supportive of the changes signaled in the discussion document. This submission outlines the key points that are supported by QLDC and recommendations.

- QLDC notes the challenge to design national direction to achieve the purpose set in the Resource Management Act 1991 (RMA), and successive legislation. Feedback on this discussion document has been provided without context of the replacement RMA legislation.
- QLDC supports changes that strengthen strategic planning and result in better integration between planning and infrastructure to ensure cost effective infrastructure delivery that achieves co-ordinated strategic growth. The core barrier to development in Queenstown Lakes District (QLD) has not been the availability of zoned land, but rather the timely provision of infrastructure to support development on already-zoned land.
- It is important that the council's responsiveness to out-of-sequence development proposals, if required, does not result in the diversion of funding already allocated to infrastructure for planned strategic growth and limited resource capacity. The new system should enable councils to prioritise developments within Priority Development Areas (as identified in Spatial Plans) which may have the potential to unlock greater housing capacity and ensures urban expansion through a whole corridor approach.
- It is important that the future system recognises housing supply as one component of good housing and urban outcomes. We know that developing well-designed town centres and neighbourhoods is important to communities.
- The new system needs to adopt a network-wide approach considering and connecting all infrastructure providers, including social infrastructure, to ensure growth is co-ordinated and future proofed.
- Information on the funding and financing settings (Pillar 2) is required to ensure councils can comprehensively assess signaled changes alongside funding mechanisms for infrastructure enabled through district plans. QLDC is strongly supportive of the direction for 'growth pays for growth' to be reflected in Pillar 2.
- The new systems must provide local authorities flexibility to manage local resource management issues.

QLDC made a separate submission on the Infrastructure, Development and Primary Sector packages of the National Direction reforms. QLDC would like to be heard at any hearings that result from this consultation process. It should be noted that due to the timeline of the process, this submission will be ratified by Council retrospectively at the next council meeting. Thank you again for the opportunity to comment. QLDC would value continued engagement through the process of these reforms.

Yours sincerely,

Glyn Lewers
MayorMike Theelen
Chief Executive

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1.0 Context of Going for Housing Growth in relation to QLDC

- 1.1 The district is one of Aotearoa, New Zealand's premier visitor destinations, drawing people from all over the world to enjoy its spectacular wilderness experiences, world renowned environments and alpine adventure opportunities. Approximately 97% of the land within the district is classified as an Outstanding Natural Landscapes and Features (ONL/F) and is a major attraction for international visitors and a material factor for community wellbeing.
- 1.2 The Queenstown Lakes District (QLD) has an average daily population of 81,660 (visitors and residents) and a peak daily population of 122,490. By 2055, this is forecast to increase to 147,518 and 221,276 respectively¹. The district has a relatively small ratepayer base comparative to the scale of infrastructure and services required to support both residents and the large number of visitors.
- 1.3 These geographical and growth conditions generate housing affordability, infrastructure and resilience challenges for the district.
- 1.4 QLDC has been working collaboratively with its communities, Kāi Tahu, Otago Regional Council (ORC) and central government partners. This relationship has resulted in the Grow Well Whaiora Partnership and a first-generation Spatial Plan² for the district. The Spatial Plan directs growth in a way that will make positive changes to the environment, enable housing development and infrastructure, enable economic and productivity growth and promote the wellbeing of the community. For example, QLDC is proactively planning for growth of the district and has released a draft structure plan for one of the Spatial Plan's Priority Development Areas, Te Tapuae Southern Corridor³. The structure plan would provide for approximately 9,300 homes, commercial and mixed-use areas, increased industrial zoning, better transport options and potentially new ways to access the area. To put this level of growth in perspective, the number of houses proposed will double the number of existing houses in the Whakatipu ward (which includes Queenstown) in 2023⁴.
- 1.5 ORC, QLDC and Central Otago District Council (Otago Central Lakes Sub-Region - OCL) have partnered to apply to central government for a Regional Deal, which if successfully negotiated will be a strategic = long-term partnership. This will progress joint priorities including economic growth, enablement of housing, better management and utilisation of local assets, and closing of the infrastructure deficit. It was announced in July 2025 that OCL, alongside Auckland and Western Bay of Plenty has been selected to progress with negotiations for a Regional Deal.
- 1.6 QLDC has been reviewing its operative district plan in stages since 2015. The Proposed District Plan (PDP) now applies to around 98% of the district's land area and represents a considerable step forward in managing the district's complex land use management challenges and aligns well with the RMA's existing suite of existing national direction instruments. QLDC, along with businesses, Mana Whenua and the community, has invested heavily in the development of the PDP. The Urban Intensification Variation to implement Policy 5 of the National Policy Statement on Urban Development is in progress and will enable greater building heights and densities in the urban environment, resulting in more efficient use of urban land and increased development capacity.

¹ <https://www.qldc.govt.nz/community/population-and-demand>

² QLDC Spatial Plan <https://www.qldc.govt.nz/your-council/council-documents/queenstown-lakes-spatial-plan/>

³ [Te Tapuae Southern Corridor | Let's Talk Queenstown Lakes District Council](#)

⁴ Census, 2023

- 1.7 Council's Housing Capacity Assessment (currently under development) identifies that the district has plan-enabled dwelling capacity to accommodate housing growth, with 50,853 enabled in the short term, 77,750 enabled in the medium term and 92,900 enabled in the long term. This is more than sufficient to meet the projected demand (as required by the National Policy Statement on Urban Development 2020) of 2,793 in the short term, 9,100 in the medium term and 27,100 in the long term. A range of notified variations to the QLD Proposed District Plan have also been progressed to increase greenfield capacity and upzone residential and commercial areas. The investment and provision of infrastructure to deliver the development enabled by the district plan is the key issue for QLD.
- 1.8 In QLDC's Long-Term Plan 2024–34⁵ and Strategic Framework there is a strong focus on providing for growth and building resilience for the future. The Long-Term Plan allocates a \$2.4 billion capital infrastructure portfolio, with strong focus in years one to three towards three waters services. It was agreed recently that QLDC would shift to a Water Services Council Controlled Organisation (WSCCO) which will be owned by QLDC and responsible for the delivery of water services.
- 1.9 QLDC recently released its draft Climate and Biodiversity Plan 2025-2028 for public feedback, that focuses on “accelerating transformation through partnership” and an integrated mitigation, adaption and biodiversity action approach which includes housing growth implications such as hazard risk management and renewable energy. Additionally, QLDC recently concluded consultation on its draft Waste Management and Minimisation Plan 2025-2031 (WMMP), which identified construction waste as a key focus area. It set a number of actions aimed to prevent or divert waste through measures such as thoughtful design, improved onsite practices, and enhanced facilities and services that prioritise reducing, reusing, and recycling.
- 1.10 This submission provides feedback followed by recommendations on the Going for Housing Growth Discussion Document (the discussion document).

2.0 Good housing and urban development outcomes build communities and neighborhoods, and are place-specific

- 2.1 Housing is an important component of good housing and urban development, but good design must also focus on developing well-designed commercial centres and neighbourhoods. There is a strong desire from QLD communities for areas to be planned in a way that meets the needs of current and future generations and integrated with quality transport, core council infrastructure and additional infrastructure including schools, energy, transport links and healthcare. There is a risk that over-emphasis on housing supply, without sufficient consideration of other components of urban development required to achieve well-functioning urban environments, will result in sub-optimal outcomes.
- 2.2 It is also critical to note that good housing and urban development outcomes are unique for different districts. The system should enable individual districts to address local issues. For the QLD, these issues include striking an appropriate balance between keeping pace and enabling sufficient growth, whilst ensuring sustainable infrastructure solutions at developers cost and protecting outstanding natural landscapes which are key to the regions ongoing contribution to the tourism sector.

3.0 As QLDC has unlocked significant district plan-enabled capacity, the critical barrier to growth is the timely investment and provision of infrastructure to enable development on already-zoned land

⁵ <https://www.qldc.govt.nz/your-council/council-documents/long-term-plan-ltp/>

- 3.1 The direction to strengthen the role of spatial planning to enable local authorities to promote good housing and urban outcomes and integrate planning for infrastructure is strongly supported. QLDC also supports the direction to enable councils to identify priority development areas and stage development to ensure efficient land use and cost-effective infrastructure delivery.
- 3.2 The proposed requirements for spatial planning to include longer-term planning horizons, better use of information and evidence and minimum infrastructure content requirements are broadly supported. It is noted that the proposed requirements will require local authorities to undertake longer-term planning and two-way collaboration with infrastructure providers to determine demand and plan the investment and delivery of infrastructure. This will represent a different way of working for councils.
- 3.3 The most critical barrier to development in QLD is timely provision of infrastructure to support development on already-zoned land. As mentioned before, Council's Housing & Business Development Capacity Assessment identifies that the district has district plan-enabled capacity to accommodate housing growth that is more than sufficient to meet the projected demand across the short, medium and long term, as required by the National Policy Statement on Urban Development 2020 (NPS-UD). In addition, a range of notified variations to the QLD Proposed District Plan are being progressed to increase greenfield capacity and upzone residential and commercial areas. The investment and provision of infrastructure to deliver the development enabled by the district plan is a key issue for QLD.
- 3.4 In QLD, a large part of the infrastructure required to enable new developments is not controlled by Council. Therefore, clarity is required as to how this new system will apply to all infrastructure providers (i.e., education, health, roading and energy). Councils may prioritise investment in infrastructure, however often growth is constrained by other infrastructure delivered by other providers.
- 3.5 The draft structure plan for an additional 9,300 houses in the Te Tapuae Southern Corridor is a good example of this. This area was identified in the Spatial Plan as a Priority Development Area. Coordinating the need to accommodate growth with the investment and delivery of necessary infrastructure has been challenging. The infrastructure required to unlock development, such as roads (including State Highway 6), public transport, and new primary and secondary schools, has not been adequately addressed. The development of options to help Council and developers meet the future needs of this area by relevant infrastructure providers has been a critical gap.
- 3.6 It is paramount that the new system is clear as to how it applies to other providers and takes a system approach to ensure that investment and delivery of infrastructure across all providers can keep pace with strategically enabled growth. The following clarifications are required:
- a. There are significant opportunities for Council, developers and government to work together to be agile and release housing and business capacity at a much quicker rate. This requires a network view to development, to enable the delivery of roading improvements, alternative transport options, schools and healthcare needs. A pathway is required for all the key agencies (including developers) to work together to invest, stage delivery and plan delivery timeframes. The new system must recognise in the agile land release mechanism, the multitude of council and non-council infrastructure providers required to get land to a stage ready to be developed.
 - b. It is unclear how the proposed direction for the new system "to have stronger more consistent requirements for implementation plans" will relate to councils' long-term plans or, more critically, the funding plans or decision-making processes of other infrastructure providers.
 - c. QLDC is supportive of the direction to set housing growth targets to enable enough feasible and realistic development capacity to meet future demand. It is important that these targets apply to all infrastructure providers (e.g. energy, transport, health, schools).
 - d. A definition is required to outline what the 'most likely demand scenario' is, as it is not a term in the current NPS-UD. It is important that this extends to all providers to ensure growth planning and infrastructure provision is aligned.

4.0 The proposals for responsiveness to out of sequence developments considers the impacts on Mana Whenua

- 4.1 The consideration of out of zone and sequence developments could impact on Māori and relationships with Mana Whenua partners. In QLD, a significant amount of work is undertaken to signal and plan growth in the appropriate locations through the Spatial Plan. This is achieved in partnership with Kai Tahu. Any requirements for local authorities to be agile and responsive to out of sequence developments could have significant relationship and resource implications on Mana Whenua. QLDC advocates that growth pays for growth in this instance as well and Mana Whenua can recover costs for their time and expertise.

5.0 It is critical that local authorities have clarity of the funding and financing settings (Pillar 2) which will enable infrastructure on urban zoned-land

- 5.1 In principle, improvements to infrastructure funding and financing settings are supported provided these changes limit the financial impact of growth on councils and ratepayers. However, the absence of information on Pillar 2 (Infrastructure Funding) is a significant issue for councils that are currently grappling with significant levels of growth. Implementing the requirements of the new system to increase plan-enabled capacity, without a clear understanding of the implications for infrastructure funding and provision (including 'additional infrastructure' required to achieve a well-functioning urban environment) may be an impediment to continued growth.

6.0 It is critical that out of sequence developments do not compromise planned growth, and QLDC strongly supports that 'growth pays for growth'

- 6.1 QLDC is concerned that the requirement for councils to be responsive to unanticipated or out-of-sequence developments could have significant implications for council. Currently, QLDC is prioritising infrastructure in the Priority Development Areas (PDAs) identified in the QLD Spatial Plan. Additional requirements to be agile to plan for unexpected growth and out-of-sequence developments could put significant resourcing and financial pressure on councils.
- 6.2 It is important that the council's responsiveness to out-of-sequence development proposals, if required, does not result in the diversion of funding already allocated to infrastructure for planned strategic growth and limited resource capacity. For example, the unintended impact of a council responding to an unanticipated or out of sequence development may unlock 1,000 houses, but remove infrastructure capacity and resourcing resulting in the delay of far more housing in strategically planned areas (e.g. such as 9,300 houses in the Te Tapuae Southern Corridor).
- 6.3 As such, flexibility should be provided to councils to be able to prioritise the development of Priority Development Areas within Spatial Plans to ensure council planning can efficiently unlock capacity and integrated developments with the critical social infrastructure (i.e., education, transport).
- 6.4 QLDC is strongly supportive of unexpected development areas needing to pay for the time (including consultant fees) for Council to be part of the process (including for any structure planning). QLDC is strongly supportive of the direction for 'growth pays for growth' to be reflected in Pillar 2 of Going for Housing Growth. However, it should be noted that councils will not be resourced to a level that easily accommodates ad hoc requests, regardless of who pays the bill. There will be some potential for flexibility, but there will be limits.
- 6.5 It is strongly recommended that developers are required to work alongside councils for the broader and integrated planning of the area and infrastructure. It is important that areas are future proofed for infrastructure provision, development of the area as well as trunk upgrades (i.e., access, road connections,

water, electricity). It is important that the system encourages a 'whole of area' approach, as opposed to enabling individual schemes. This is to avoid multiple disjointed small scale infrastructure solutions for growth areas that would be far more effectively and efficiently served by single large-scale solutions facilitating large scale growth and reasonable maintenance and replacement requirements for ratepayers.

7.0 The new system must provide flexibility for local authorities to address local resource management issues

7.1 As mentioned before, QLD has a context different to most districts, with the vast majority of land classified as ONL/Fs and significant demand for urban growth. These geographical and growth conditions generate land affordability, infrastructure capacity and resilience challenges. It is therefore important that the new system provides flexibility for local authorities to adapt to local resource management issues. Specific feedback includes:

- a. It is supported that assessments enable councils' flexibility to apply different development capacity tests depending on their context. For the QLD, most developments are commercially feasible, the constraints are primarily related to infrastructure provision and landscape protection. QLDC would utilise flexibility to calculate plan-enabled, commercially feasible and then infrastructure ready capacity.
- b. It is supported that councils are able to use the growth projections that they consider to be most likely to assess infrastructure-ready capacity, and that flexibility is provided to councils to make reasonable adjustments for the projections. It is noted that there could be a minimum requirement to follow high growth projections for zoning, however, flexibility for councils to go above this where indicated should be enabled. The flexibility to plan infrastructure on the most likely growth scenario should be maintained.
- c. The use of standardised zones for feasibility modelling in the new system is supported, as it is complex and time-consuming to undertake capacity assessments for non-standardised zones. The flexibility for councils to be able to determine where different zones are placed and depart from standardised zones where justified is supported.
- d. Price efficiency indicators in QLD present challenges due to high land and housing costs, coupled with strong demand for land. For instance, industrial-zoned land prices have risen to such an extent that developing these areas for industrial purposes has become economically unfeasible. As a result, developers are exploring alternative opportunities in retail, commercial, or residential projects, resulting in the crowding out of industrial development in Queenstown. Consequently, relying on a price efficiency indicator to assess land use is problematic, as rezoning additional land will not alleviate the high cost of land in QLD due to the shortage of available land outside ONF/Ls.
- e. QLDC recommends that local authorities maintain flexibility to apply requirements like minimum floor area and balconies. Any such requirements would be assessed for their costs/benefits, effectiveness and efficiency via a plan change process prior to being inserted in a regulatory plan. On-site amenity or balconies can be important to ensuring well-functioning high density living that meets a diverse range of housing needs, and these outcomes align with outcomes sought in national direction, including the NPS-UD.

8.0 Spatial Plan staging should remain a method for local authorities and policy alignment must be ensured if rural-urban boundaries are removed

8.1 Given the clear delineation between rural and urban in national directions (e.g. the NPS-UD only applies to the urban environment, the NPS-HPL and NES-CF only apply to the rural environment), to effectively apply government direction there must still be a clear delineation between urban and rural land. It is strongly recommended that clear direction is provided for how these policy changes would be managed and that a simple pathway is provided for the removal of Urban Growth Boundaries.

- 8.2 Spatial planning has an important role to play in enabling urban expansion and highlighting priority development areas where local, regional and central government should prioritise investment. QLDC recommends that prioritisation of infrastructure provision between priority development areas (PDAs) remains a method able to be used in spatial and regulatory plans. Prioritisation of specific PDAs enables urban expansion through a whole corridor approach, which results in efficient provision of infrastructure, logical connectivity between individual developments and the established roading network (including state highways), public and active transport.
- 8.3 QLDC does not have planning documents that prohibit ‘leapfrogging’ (when development occurs on land that is not directly adjacent to an urban area), however the QLDC Proposed District Plan does apply a clear distinction between urban and rural areas via zones and an Urban Growth Boundary shown on planning maps. It is recommended that if changes are made to the new system to prohibit councils from having rules against leapfrogging, that changes also enable councils to have ‘growth pay for growth’ and developers are required to work with council for the integrated planning of the broader area, as aforementioned.

9.0 QLDC is currently enabling intensification around key public transport corridors and urban centres

- 9.1 QLDC is currently enabling key public transport corridors and ensuring there is enough plan-enabled housing and business development capacity. QLDC is enabling significant development capacity around spine corridors (e.g. Te Pūtahi, Ladies Mile and Te Tapuae Southern Corridor).
- 9.2 QLDC seeks confirmation that the proposed amendments to intensification requirements only apply to Tier 1 authorities. QLDC is a Tier 2 authority currently undertaking an intensification plan change to implement Policy 5 of the NPS-UD, therefore it is critical that this is confirmed, or any change is signaled well in advance to avoid any inefficiencies or discrepancies.
- 9.3 It is strongly supported that councils be responsible for determining which corridors are included in the defined categories, so that local environments can be adequately considered. For example, if Frankton Road was redesignated as a spine road in the New Zealand Transport Agency’s (NZTA) One Network Framework. If this were to happen, this land would be enabled to six stories of height with limited accessibility due to the unique slope around the state highway.
- 9.4 QLDC notes that mixed-use zones are effective when close to town or local centres, as mentioned in the discussion document. The strategic location of mixed-use zones (rather than widespread distribution) assists with the clustering of local services and amenities, and supports efficient and effective provision of transport infrastructure, including public transport.
- 9.5 It is noted that the district plan zones are effective mechanisms to arbitrate conflict between activities, reverse sensitivity (i.e., effects of noise, traffic/parking, lighting, hours of operation etc.) and give certainty to occupants and landowners about the types of land use activities that can be established as of right. The district plan manages the level of service and industrial activities in residential areas to limit the reverse sensitivity and loss of residential land. Standards are also applied to commercial activities to ensure impacts on residential amenities are appropriately managed and require buildings are future-proofed for a range of uses during the life of the building (i.e. ceiling height).

10.0 Other matters for consideration for the transition to Phase Three

- 10.1 QLDC requests clarity regarding expectations for regional spatial plans for areas where there are a mix of tiers in the area. For example, Otago has a mix of Tier 2, 3 and no identified tiers for some areas.

10.2 Clear guidance is needed on how different National Policy Statements interact, and which instruments take precedence when overlapping provisions apply. i.e., National Policy Statement on Highly Productive Land, National Policy Statement Natural Hazards.

10.3 QLDC's Joint Housing Action Plan (2023–2028) (the plan) was developed in partnership with central government, Kāi Tahu, and the community with the objectives to ensure access to quality, stable, affordable housing for anyone who chooses to live in the district and for housing solutions to deliver better outcomes⁶. It highlights the need for affordable homes in the district with the average property value is 13.2 times average household income (the NZ average 7.4 times the average household income)⁷ and rental costs and median rent is \$700/week (comparative to \$570 nationally)⁸. The plan states a shortfall of 3,000 affordable homes and forecasts this to rise to 6,400 by 2050⁹ and outlines nine housing solutions, each with measurable actions. In line with the Otago Central Lakes Regional Deal proposal, QLDC recommends that the new system should consider an affordable housing value capture mechanism in Funding and Financing, Pillar Two to support councils to fund and incentivise new social and affordable housing in the sub-region. This is critical for community wellbeing and for the local workforce and economy.

Recommendations

R.1 The new system must reflect the network of infrastructure providers, including social infrastructure (i.e. education, water, roading, health, energy) to ensure urban development is coordinated and future-proofed:

- a. The agile land release mechanism reflects the multitude of infrastructure providers required to get land to a stage ready to be developed and provides a pathway for all the key agencies (including developers) to work together to invest, stage delivery and plan delivery timeframes.
- b. Clarity is required as to how the proposed change “to have stronger more consistent requirements for implementation plans” will relate to the funding plans or decision-making processes of other infrastructure providers.
- c. Confirm that housing growth targets apply to all infrastructure providers (e.g. energy, transport, health schools).
- d. Define the ‘most likely demand scenario’ and confirm it extends to all providers.

R.2 Information on funding and financing settings (Pillar 2) is provided to councils so that the impacts of changes to enable more urban development in district plans can be assessed alongside funding mechanisms for infrastructure.

R.3 Growth pays for growth is strongly supported and needs to be well-reflected in Pillar 2 of Going for Housing Growth.

R.4 Good housing and urban development outcomes should include adequate focus on developing well-designed commercial centres and neighbourhoods, alongside housing supply. It should acknowledge that ‘good outcomes’ are unique to different districts.

R.5 The new system should provide Councils with the ability to prioritise developments in Priority Development Areas (identified within Spatial Plans) when considering out-of-sequence developments and charge for the time of Council in the process (including consultant fees). This is to ensure that the council's responsiveness unanticipated or out-of-sequence developments does not compromise planned growth.

⁶ https://www.qldc.govt.nz/media/44ijufq0/1a-qldc-joint-housing-action-plan_a4_jun23_v5.pdf

⁷ Infometrics.co.nz (March 23)

⁸ Tenancy.govt.nz

⁹ Queenstown Lakes Housing Capacity Report 2021

R.6 The new system encourages a ‘whole of area’ approach by requiring developers of out-of-sequence projects to work alongside councils for the broader and integrated planning of the area to ensure areas are future-proofed for infrastructure provision, development of the area and any trunk upgrades (i.e., access, road connections, three waters, electricity).

R.7 Similar to earlier recommendation (R.5), the new system should provide Councils with the ability to prioritise developments in Priority Development Areas identified within Spatial Plans when considering out-of-sequence developments (as these are developed in partnership with Mana Whenua) and allow Mana Whenua to charge for their time responding to out-of-sequence developments.

R.8 The new system provides flexibility for local authorities to address local resource management issues, particularly for growth projections, development capacity tests, use of price efficiency indicators and determining appropriate rules for balconies and on-site amenity.

R.9 Guidance is provided alongside the removal of rural and urban boundaries, as to how other government directions (i.e., National Policy Statement Highly Productive Land) should be implemented and a simple pathway is provided for the removal of Urban Growth Boundaries.

R.10 The prioritisation of infrastructure provision between priority development areas (PDAs) remains a method able to be used in spatial and regulatory plans to enable urban expansion through a whole corridor approach and efficient provision of infrastructure.

R.11 If the new system prohibits councils from having rules against leapfrogging, that changes also enable councils to have ‘growth pay for growth’ and developers are required to work with council for the integrated planning of the broader area, as recommended in (R.5) and (R.6).

R.12 Confirmation is required that intensification provisions in the new system still only apply to Tier 1 authorities.

R.13 The new system enables councils to determine which transport corridors meet the definition of each specified category, so that local environments and conditions can be adequately considered.

R.14 Clarity is provided for what the expectations are for regional spatial plans for areas where there are a mix of Tiers in their area. For example, Otago has a mix of Tier 2, 3 and no identified tier authorities.

R.15 Clear guidance is provided on how different National Policy Statements interact, and which instruments take precedence when overlapping provisions apply. i.e., National Policy Statement Highly Productive Land, National Policy Statement Natural Hazards.

R.16 Consider an affordable housing value capture mechanism in Funding and Financing (Pillar Two) to support councils to fund and incentivise new social and affordable housing in the sub-region.