

16 October 2026

Submission on the illustrative National Policy Direction

Te Kāhui Whaihanga New Zealand Institute of Architects (NZIA) welcomes the opportunity to provide feedback on the illustrative National Policy Direction. We represent more than 4,000 members working across housing, commercial development and public infrastructure throughout Aotearoa New Zealand.

We support the direction toward a clearer planning system that introduces more certainty for development and enables better, denser cities while coordinating housing and infrastructure closely to maximise the opportunity to create communities where more Kiwis want to live. Our central recommendation is to explicitly provide for precinct planning, supported by a practical funding mechanism, so that regional growth decisions translate into neighbourhoods that function well for the people that live there, with development and environmental protection coordinated from the outset.

Support for the direction of reform

The illustrative National Policy Direction provides a strong foundation for improving how our cities grow. The emphasis on enabling development, making better use of infrastructure and providing greater housing choice aligns with several priorities in our prior submission in August 2025 on the Resource Management Reforms Package 4: Going for Housing Growth.

- **Growth that makes better use of infrastructure.** Cross-cutting Directive 5 prioritises growth in areas where it can efficiently be supported by infrastructure and where existing and planned investment can be used well. The NZIA strongly agrees we need to prioritise intensification in existing urban areas first, where people have good access to transport, employment and services. Prioritising growth in well-serviced urban areas can reduce infrastructure costs, make better use of existing investment, reduce transport emissions and the embodied carbon of new infrastructure, and create opportunities to reuse existing buildings and retain carbon already spent.
- **Closer coordination of development and investment.** Cross-cutting Directive 6 links the sequencing of growth and infrastructure to efficient public investment and recognises opportunities supported by private or other investment. Our Going for Housing Growth submission emphasised that housing capacity needs to be supported by infrastructure and realistic delivery pathways. Planning these together gives developers greater certainty and reduces the likelihood of large-scale housing development commencing out of sequence before the services needed to support it.
- **More housing choice and better access to everyday needs.** Housing and Development Directive 2.1 supports a diverse range of housing types, a mix of compatible activities, and good connections between homes, workplaces, services and



open spaces. We strongly support a broader mix of apartments, terraces, townhouses, smaller infill developments and the reuse of existing buildings. Housing growth should give people more options to suit their lifestyles, needs and budgets, in neighbourhoods that work for daily life.

- **Design quality is central to whether greater housing choice and density succeed.** In our experience, the strongest community resistance to intensification is often driven not by density itself, but by concern about poor-quality homes and neighbourhoods. Density can work, and gain lasting community support, when it delivers healthy, comfortable, energy-efficient and well-designed homes and neighbourhoods. We recommend that the NPD recognise design quality as a core characteristic of a well-functioning urban area.
- **Intensification in well-connected locations.** Housing and Development Directives 2.2 and 2.3 enable greater density around centres, public transport and other areas with demand or good accessibility. We support well-designed intensification in urban centres as the first priority for accommodating growth. Clear national expectations can help unlock capacity and provide greater certainty about where development is anticipated.

The indicative national standards also recognise the need to consider infrastructure timing, feasibility and investment. We support developing these tools alongside national policy direction so that councils and infrastructure providers have a clear framework for implementation.

These are positive foundations. The next step is to ensure the system also provides for the detailed planning needed to translate them into development on the ground.

The missing link is precinct planning.

The illustrative direction recognises regional spatial plans and land use plans but does not explicitly establish the role of precinct planning in connecting them to delivery. Regional spatial planning identifies where growth should occur. Zoning enables development. Neither, on its own, resolves how a neighbourhood will function as it grows.

A precinct plan brings that work together across a defined neighbourhood or growth area. It shows how housing, streets, public transport, schools, parks and other amenities and services will fit together, and identifies the infrastructure and investment needed to support them. It can help establish where apartments, terraces, shops and community facilities are best located, and how public spaces and connections will serve the growing community.

Environmental considerations underpin safe, liveable and resilient neighbourhoods. As communities face more frequent and severe weather events, natural hazards and environmental constraints need to be understood at catchment, district and regional scales, because flooding, stormwater and ecological systems extend beyond individual

neighbourhoods. Precinct planning should apply this information before development patterns are fixed and coordinate with surrounding precincts and neighbourhoods. Within that wider context, it can guide where housing and infrastructure are located, how stormwater is managed and which areas should be avoided or protected, reducing exposure to flooding and other hazards.

Where more detailed coordination is needed, master plans can address site layout, how buildings relate to each other, public spaces and the stages of development.

This particularly matters in existing urban areas, where development takes place across multiple properties and owners. Individual projects cannot resolve every shared infrastructure or neighbourhood need. Without coordination, each development could proceed within the rules while opportunities to improve the wider area would be missed.

In our view, the successive rounds of recent changes to Auckland's planning illustrate the difficulty of building community confidence when broad proposals for intensification are not accompanied by a clear picture of how neighbourhoods will develop. When people see building heights and densities being enabled, but cannot see how schools, transport, parks and other amenities will keep pace and fit together in their area, uncertainty leaves room for conflicting interpretations and worst-case assumptions. This can fuel opposition to density and pressure for further changes, adding uncertainty for communities and developers alike.

Precinct planning can help address this by making the intended outcomes visible and giving communities a meaningful opportunity to shape how local growth is accommodated. People can see where different types of housing are anticipated, how development will be supported and what improvements it can bring to their area. That gives communities more certainty and a stronger basis for supporting change.

The same clarity can encourage development in the right places. Clear expectations about infrastructure, public investment, and the form of development reduce uncertainty for landowners and developers, giving them greater confidence to invest. Resolving shared issues early can also reduce disputes, redesign and the cost of retrofitting infrastructure and amenities later.

Precinct planning is a practical way to deliver the outcomes the illustrative National Policy Direction seeks, with greater certainty for those delivering development and those living alongside it.

Make precinct planning part of implementation

Precinct planning is already used for some greenfield developments, and where it is done well the benefits are clear. Hobsonville Point, for example, shows how a strong plan and coordinated delivery can bring housing, infrastructure, services and public spaces together to

create a coherent and well-functioning neighbourhood. However, this approach is not consistently prioritised across new growth areas.

The greatest untapped opportunity may be in established urban areas where intensification is expected. Growth in these areas is usually delivered incrementally across multiple redevelopment sites and landowners, with no single developer responsible for how the neighbourhood works as a whole. Spatial and land use plans may enable more housing, but without precinct planning communities cannot easily see what that growth could deliver or how development, infrastructure, services and public investment will fit together. Precinct planning can fill this gap by turning enabled capacity into a visible, coordinated proposition that communities can help shape and that councils, infrastructure providers, landowners and developers can use as a shared framework for delivery.

We recommend that the final National Policy Direction explicitly recognise precinct planning as a delivery tool for well-functioning urban areas, with supporting national standards clarifying its relationship to regional spatial plans, land use plans and infrastructure investment. The focus should be key growth areas, particularly centres and rapid transit catchments where substantial change is expected.

We recommend clearer guidance on how the land supply provisions in Housing and Development Directives 1.1 and 1.5 should operate alongside the infrastructure coordination and investment priorities in Cross-cutting Directives 5 and 6. Precinct planning can help connect enabled development with practical arrangements for infrastructure delivery, timing and funding, giving councils, landowners and developers greater certainty.

For Directive 1.6, we recommend that national standards provide clear expectations for how development proposals should address outstanding natural features and landscapes and areas of high natural character and clarify how protections under special legislation apply. Precinct planning can help identify these requirements early and coordinate appropriate responses alongside housing and infrastructure, reducing uncertainty and the need for later redesign.

Precinct planning should also identify opportunities to retain urban trees and provide green space alongside development, recognising their contribution to stormwater management, temperature control and neighbourhood resilience to extreme weather events and climate risk.

Precinct plans should:

- Coordinate housing growth with transport, water infrastructure, schools, parks and other community needs.
- Map environmental constraints, natural hazards and climate risks first, so that housing and infrastructure are planned alongside the protection of waterways, habitats and other important natural features.

- Bring councils, iwi, infrastructure providers, landowners, and communities into the process early as essential partners.
- Identify responsibilities, investment requirements and priorities for delivery.
- Allow for review and adaptation as needs and circumstances change.

The level of planning should be proportionate to the scale of change. It should support the housing capacity enabled by reform, without becoming a prerequisite for every development. The aim is to resolve shared issues early, make development easier to deliver and reduce avoidable costs later.

Precinct planning could help identify practical options for regulatory relief where protections significantly affect the reasonable use of private land. For example, where protections for trees, green space, landscapes or heritage significantly affect landowners, precinct plans can transfer development potential from protected land to suitable intensification sites, resolving protection and relief together in a single process and reducing cost and litigation for councils and landowners. Clear national guidance on when relief applies would also help councils protect important public values with confidence.

Provide a practical way to fund the work

We recognise that precinct planning will only be effective if there is a way to pay for it. Benefits extend across multiple properties and the wider community, while the upfront cost can fall to a council or an individual developer. A shared funding mechanism could help overcome this barrier.

We propose that Government explore whether the Infrastructure Funding and Financing Act 2020 could be used or adapted to support precinct planning. Its special purpose vehicle model enables infrastructure finance to be repaid through levies on those who benefit. A comparable approach could fund planning upfront and recover an appropriate share of its cost from benefiting landowners over time.

This would require confirmation of whether precinct planning costs could qualify within an eligible infrastructure programme, or whether a specific extension to the framework is needed. The principle is that those who benefit from the greater development certainty and coordinated investment a precinct plan provides should be able to contribute to the cost of preparing it.

Contributions should be modest and proportionate to the benefit, with transparent costs and a fair allocation between private and wider public benefits. Eligible costs should also include the environmental assessment and mapping needed, as this work underpins the rest of the precinct plan. The mechanism should also be simple enough that the cost of establishing and administering it does not outweigh the value of the planning work.

International experience provides a useful basis for exploring this approach. In Texas in the United States, Dallas shows how a shared funding arrangement can support coordinated

planning and local improvements over many years, with sustained backing from contributing property owners.

Shared funding in practice in Dallas

Dallas's Downtown Improvement District was established in 1992 to enable property owners to contribute collectively to improvements in their area through an annual property charge.

Managed by the non-profit Downtown Dallas, Inc., the programme includes planning, transport and public-space improvements alongside services such as cleaning and safety.

The organisation worked with the city and local stakeholders on the updated 360 Plan, adopted in 2017. This brought housing, transport and neighbourhood priorities together, with clear actions and responsibilities for delivery. The funding partnership provided an ongoing organisation to help coordinate this work alongside the council.

The district has been renewed repeatedly. In 2020, property owners again backed its continuation for a further seven years, supporting continued contributions to the shared programme. This demonstrates enduring support for an arrangement that connects local contributions with planning, services and improvements in the area.

The Dallas programme is broader than precinct planning, but the principle demonstrates that beneficiaries can contribute collectively to work that requires coordination across individual properties. New Zealand could adapt that principle through a more focused mechanism for preparing precinct plans, with contributions proportionate to the work required and the benefits received.

Next steps

The NZIA encourages Government to explicitly recognise precinct planning in the final National Policy Direction and explore a practical mechanism to fund its preparation. We would welcome a meeting with Ministers and officials to discuss how these proposals could support the reforms, giving developers greater certainty to invest, and offer communities greater confidence in how their neighbourhoods will grow and thrive.