



25th July 2025

National Direction Consultation
Ministry for the Environment
PO Box 10362,
Wellington 6143

Re: Submission on the Resource Management Reforms Package 1: Infrastructure and Development

Introduction

This submission is made on behalf of Te Kāhui Whaihanga New Zealand Institute of Architects (NZIA), the professional body representing more than 4,000 architects, graduates, students, and affiliated professionals across Aotearoa. For over 120 years, the NZIA has promoted the value of architecture in creating safe, inclusive, and sustainable communities.

Our purpose is to promote the role of architecture in delivering affordable, resilient, and inclusive communities, and to ensure that we have the right regulatory settings to enable this goal. We advocate for design not as a luxury, but as a tool of utility: one that adds long-term value, reduces risk, and serves the public good. Architecture is fundamentally practical, coordinates complexity, ensures regulatory compliance, and delivers outcomes that are safer, liveable, and enduring.

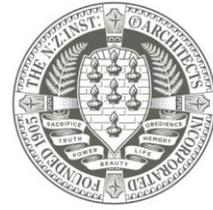
We support the Government's intent to simplify and strengthen national direction under the Resource Management Act (RMA). Our members regularly work at the intersection of planning, design, and construction, and we know from experience that clarity, consistency and good design are essential to delivering affordable, practical outcomes.

The NZIA broadly supports the proposed reforms, particularly where they reduce unnecessary cost and delay. But we caution against one-size-fits-all solutions that compromise quality, negatively impact our built or cultural heritage, or adversely affect environmental integrity. Infrastructure and housing affordability must go hand-in-hand with good planning and well-considered design.

As professionals involved in the implementation of this system, from minor dwellings and papakāinga to infrastructure and natural hazard mitigation, architects offer practical, design-led insights into what will and won't work in practice. We want to ensure national directions enable high-quality, cost-effective development that reflects local context and serves all New Zealanders well.

Our submission responds to selected proposals where the profession can add value and help ensure that reforms are workable, equitable, and future-focused.

The Institute is submitting recommendations on the following national direction instruments proposed for development or amendment:



- New National Policy Statement for Infrastructure
- Amendments to National Policy Statement for Renewable Electricity Generation 2011
- New National Environmental Standards for Granny Flats (Minor Residential Units)
- New National Environmental Standards for Papakāinga
- New National Policy Statement for Natural Hazards



Part 2.1: New National Policy Statement for Infrastructure

Te Kāhui Whaihanga New Zealand Institute of Architects (NZIA) supports the Government's objective of making it easier to build affordable, high-quality buildings and infrastructure. We agree that reform is needed to reduce unnecessary time, cost and complexity in the planning and consenting system and to support the efficient delivery of nationally significant infrastructure.

We endorse the Government's intent to develop an integrated and consistent national policy for infrastructure that recognises its purpose for public good and interconnected nature. A nationally consistent framework is urgently needed to overcome the fragmented, ad hoc approach that currently constrains infrastructure development and limits our ability to plan for long-term growth and resilience.

There is an opportunity to define infrastructure's public good function clearly in the NPS-I and require infrastructure strategies to assess distributional outcomes, especially for Māori, Pacific, and low-income communities.

We support the proposals in principle, particularly the moves to streamline the planning system, reduce duplication, and enable strategic infrastructure delivery. However, we urge careful attention to the following key considerations to ensure that the reforms result in enduring, high-quality outcomes:

- Insufficient alignment between infrastructure and spatial planning, risking inefficiencies and poor urban outcomes;
- Loss of design quality and liveability in urban intensification;
- Erosion of protections for historic heritage, which is a matter of national significance under section 6(f) of the RMA;
- Overriding of local context in favour of one-size-fits-all approaches;
- Insufficient safeguards for cultural values and community participation, especially where fast-tracked processes are used.

To deliver the highest public value from infrastructure investment, we recommend embedding a shared vision for good urban development, supported by clear design standards, principles-based evaluation frameworks, and mechanisms to ensure infrastructure contributes meaningfully to national outcomes.

To support implementation, national direction must be paired with strong coordination mechanisms, guidance for local government, and enduring bipartisan support. We also recommend the creation of a national urban development agency with powers to lead master planning, land assembly and delivery of complex projects — helping ensure a joined-up approach to infrastructure and urban development. This would be similar to the offices of the Government Architect in Australia, which provide independent strategic advice on built environment policy, planning, and major projects. They play a key role in ensuring design quality and cross-sector integration, as demonstrated in the



Parramatta Square redevelopment, where it led urban design frameworks and coordinated multi-stakeholder collaboration.

Question 1: Is the scope of the proposed NPS-1 adequate?

We support the intention behind the proposed NPS-I to provide a nationally consistent and integrated policy framework for infrastructure. However, we want to ensure the scope is not too narrowly defined as this may limit the effectiveness over time.

We caution against a restrictive or overly static view of infrastructure. Infrastructure in Aotearoa is evolving, and the NPS-I should anticipate that evolution — particularly in the face of new technologies, changing delivery models, integrated systems, and climate and demographic shifts. We recommend that the scope and accompanying definitions be more future-focused, allowing for infrastructure types and functions to adapt over time.

We recommend the NPS-I explicitly recognise housing as a form of infrastructure. While the current proposal implies a connection, we recommend it confirms housing as essential social and economic infrastructure in its own right. Explicit recognition would elevate housing as a core priority in infrastructure planning and investment, drive more coordinated efforts across sectors, and justify public funding in housing delivery just as we do for transport or water. Housing is not just enabled by infrastructure — it is infrastructure.

The current proposals could also further develop the definition of social infrastructure. While education is appropriately included (from ECE to tertiary), other critical forms of social infrastructure (such as community halls, primary healthcare facilities, sports and recreation facilities, and civil defence hubs) are either missing from the scope or only ambiguously referenced. We suggest that the NPS-I definitions be expanded to include:

- Community halls and shared public facilities, particularly those with dual or emergency-use functions (e.g. for civil defence);
- Primary healthcare and integrated health hubs;
- Sports and recreation facilities (including those co-located with schools or parks);
- Infrastructure that supports the functioning of transport networks (e.g. bus depots, maintenance yards);
- Parks and open spaces beyond stormwater-related purposes, including those contributing to urban amenity, health, and community wellbeing;
- Integrated or multi-purpose facilities, particularly those operated under joint or overlapping requiring authorities (e.g. local and national road-controlling authorities).

Question 2: Do you agree with the definition of ‘infrastructure’, ‘infrastructure activities’ and ‘infrastructure supporting activities’ in the NPS-I?

We recommend the terminology used reflects contemporary infrastructure practice — such as “network infrastructure,” “green infrastructure,” and “multi-modal” systems. These concepts reflect



the interconnected, systems-based nature of modern infrastructure and would help ensure the policy remains relevant as infrastructure delivery evolves.

The rationale for including or excluding different infrastructure types is currently unclear. We recommend that the document provide a clear logic or set of principles for determining what infrastructure is in scope, and why.

The current definition of transport infrastructure is unclear in terms of whether it includes ancillary and supporting functions such as depots, charging stations, and operational power infrastructure. These components are essential to the wider network and should be explicitly covered.

We recommend greater clarity around how stormwater infrastructure is treated, particularly under Requiring Authority provisions. The discussion document defines stormwater provision as exclusively *urban*. We recommend that rural stormwater systems also be considered, given their role in managing flood risk and supporting land development. Consideration should also be given to whether stormwater infrastructure should be managed under Requiring Authority mechanisms to better address flooding risk, particularly in climate-vulnerable areas.

We recommend all definitions and accompanying examples be robustly tested to ensure they serve the intended purpose and provide sufficient guidance for local authorities and applicants. Gaps or ambiguity at this stage risks introducing future inconsistencies in interpretation and implementation.

Question 3: Does the proposed objective reflect the outcomes sought for infrastructure?

The objective is broadly appropriate, but we recommend strengthening it by explicitly referencing whole-of-life costs. “Value for money” should go beyond upfront capital costs to include long-term operational and maintenance costs, and whether the development will generate sufficient return (e.g. through rates) to support the infrastructure over time. This would promote more sustainable, future-focused investment decisions.

Question 4: Does the Proposed policy adequately reflect the benefits that infrastructure provides?

Yes, and it should reflect whole-of-life benefits, including long-term social, environmental, and financial outcomes beyond initial delivery.

Question 5: Does the proposed policy sufficiently provide for the operational and functional needs for infrastructure to be located in particular environments?

No. The policy does not adequately account for the nuanced realities of infrastructure delivery, including overlapping responsibilities, shifting ownership or management over time, and the complexity of multi-agency coordination. Greater flexibility is needed to accommodate these organisational and operational variations.

The phrase “where services are required” also needs clearer definition and justification. While it may be appropriate in many cases, we recommend its application be supported by robust analysis and allow for consideration of alternative options during decision-making.



Question 6. Do you support the proposed requirement for decision-makers to have regard to spatial plans and strategic plans for infrastructure?

Yes, the Institute supports the proposal. Aligning infrastructure decisions with spatial and strategic plans will help integrate housing, transport and environmental outcomes. However, the effectiveness of this approach depends on the quality and consistency of the plans.

We recommend:

- Ensuring spatial plans are locally informed, robust, and developed through genuine stakeholder engagement;
- Addressing potential contradictions between overlapping plans and clarifying which plans take precedence;
- Clear expectations that infrastructure providers engage early in the spatial planning process;
- Encouraging integration with urban design principles and alignment with national frameworks like the New Zealand Urban Design Protocol.

Question 7. Would the proposed policy help improve the efficient and timely delivery of infrastructure?

Yes, the proposed policy is a positive step toward reducing unnecessary delays and duplication in infrastructure consenting. Requiring the use of existing investment case information and best practice standards is pragmatic.

We also stress the importance of maintaining design quality and environmental safeguards in the pursuit of efficiency. Timeliness must not come at the expense of context-sensitive design, especially where infrastructure interfaces with sensitive heritage or special character areas.

Question 8. Does the proposed policy adequately provide for the consideration of Māori interests in infrastructure?

NZIA supports the policy's intent and acknowledges the need for early and genuine engagement with tangata whenua in infrastructure development. The recognition of Māori interests, aspirations, and opportunities to develop or partner on infrastructure projects is welcome.

However, we recommend:

- Stronger alignment with iwi management plans and spatial strategies;
- Explicit reference to protecting cultural landscapes and heritage;
- Ensuring support for Māori participation in infrastructure planning and delivery

Question 87. Do the proposed policies sufficiently provide nationally consistent direction on assessing and managing the adverse effects of infrastructure?



We are broadly supportive of the proposals to improve national consistency. The current fragmented system has led to significant variability in how infrastructure impacts are assessed, particularly on historic heritage, which is inadequately addressed in many plans despite its national significance under s6(f) of the RMA.

We recommend that:

- The definition of “sensitive activities” be expanded to include heritage buildings and sites;
- Direction be provided on assessing effects on heritage values and on incorporating heritage impact assessments in project design;
- Adaptive reuse be recognised as a strategy for balancing infrastructure needs with heritage preservation.

We support a balanced approach to heritage that protects the cultural, historical and architectural significance of our built environment while enabling thoughtful, contemporary development. We do not see heritage protection and progress as opposing forces. It is the Institute’s position that well-designed modern buildings and sensitive heritage conservation can, and should, exist side by side.

We advocate for planning and policy settings that:

- Recognise and protect heritage buildings, sites and areas as taonga of national and local significance;
- Enable affordable, adaptive reuse and sensitive integration of heritage into new development. This could also include relaxing some of the requirements, such as accessibility or seismic requirements to encourage reuse;
- Encourage new buildings that contribute positively to their context and deliver affordable, long-term environmental, cultural and social value.

We note that internationally there is an increasing trend in government policy stipulating a retrofit first approach, prioritising adaptive reuse of existing buildings and structures, and integrating heritage reuse within broader urban regeneration projects. These approaches are implemented through policy frameworks and funding mechanisms. We note that these are in use in the United Kingdom and throughout the European Union, namely Belgium, the Netherlands and Denmark, to name a few examples.

We support reforms that reduce unnecessary barriers to good development but caution against blanket approaches that risk losing what makes our communities distinct and meaningful.



Part 2.2: National Policy Statement for Renewable Electricity Generation

Te Kāhui Whaihanga New Zealand Institute of Architects (NZIA) supports the Government's intention to strengthen national direction for Renewable Electricity Generation (REG). The NZIA urges that reforms not only prioritise the scale and pace of REG development but also uphold design quality, community outcomes, cultural values and integrated land use. NZIA members emphasise that REG infrastructure must be well-designed, context-sensitive, and supported by robust consenting processes that are accessible to smaller-scale and community-based initiatives. One of our key goals is to support the development of a low-emissions and high-resilience electrified built environment for Aotearoa New Zealand enabled through good design.

Our experience indicates that urban areas generally present fewer barriers to implementing renewable electricity generation – such as solar photovoltaic (PV) systems – compared to rural areas. This is a positive trend. However, we have observed inconsistent regulatory approaches across the country that are delaying projects that could deliver immediate benefits, including reduced energy costs, enhanced resilience, and support for the national electricity grid.

We strongly support the development of a consistent national policy direction to address these disparities and provide clarity on how councils should manage uncertainty and variation in consenting processes.

We do not want to criticise individual councils, but are concerned about the inconsistency. The following examples demonstrate the issue:

1. Central Hawke's Bay District Council: In 2024, new rules required resource consent for solar installations over 20kW, including rooftop systems. Despite having prior consent for a construction project that included rooftop solar, a commercial business was issued an abatement notice mid-project, halting the installation.
2. Hurunui District Council: A planner reported that the council requires consent for solar installations exceeding 25m² - an area smaller than what is typically needed to power an average New Zealand home.

These examples demonstrate that, despite solar technology being well-established, many councils remain uncertain about how to integrate it within their planning frameworks. This uncertainty often results in overly cautious approaches, driven by a desire to avoid legal risk and ensure environmental protection.

We recommend that a consistent national framework is developed, with policies that actively support the electrification of the built environment. This should prioritise the integration of solar photovoltaic (PV) systems in commercial developments and promote greater uptake of solar PV in residential settings. Encouraging widespread adoption through clear, supportive policy and toolkits/guidance will help accelerate the transition to a low-emissions, resilient energy future.



We recommend the introduction of a national direction to clarify appropriate thresholds and consent conditions for the installation and operation of solar panels. A consistent framework would provide certainty for councils, architects and designers, developers, and communities, and help accelerate the transition to a more resilient and sustainable energy system.

Question 11: Do you support the proposed amendments to the objective of the NPS-REG?

NZIA supports the intent of the strengthened objective, particularly the emphasis on emissions reduction, resilience, and community wellbeing. However, members caution that the language around “rate and manner” of REG expansion should be carefully defined to avoid unintended fast-tracking of poorly designed or inappropriately located infrastructure. NZIA recommends that “managing adverse effects” explicitly includes visual, landscape and built environment considerations, which are critical for public acceptance and long-term integration.

We recommend adding the underlined text to the objective:

2. provides greater resilience to disruptions to electricity supply, particularly where renewable energy is generated and stored locally in communities that are vulnerable to power outages.

Question 12: Are the additional benefits of REG helpful considerations for decision-makers?

Yes. The NZIA agrees the expanded list of benefits is helpful, especially the inclusion of co-location, proximity to demand, and maintenance of existing assets. Members also recommend additional reference to benefits of quality design in mitigating adverse effects and supporting positive community outcomes. The benefits of good planning and design, such as amenity, cultural integration, and spatial quality, should be more explicitly linked to the REG context.

Question 13: Does the proposed policy sufficiently provide for the operational and functional need of REG to be located in particular environments?

In principle, yes. NZIA acknowledges the need for REG to be located based on environmental, technical and network realities. However, members suggest that the policy should also require early engagement with communities, design professionals, and constructors to resolve potential conflicts with local character, land use compatibility, and amenity values.

Question 14: Do the proposed policies adequately provide for existing REG to continue operating?

NZIA supports policies that provide certainty for existing REG infrastructure. We agree that reconsementing and upgrading processes must be more efficient, but also advocate for maintaining public visibility and accountability. Consent changes should retain provisions for design outcomes, visual quality and landscape integration, especially as upgrades often involve larger structures or visual impacts.



Question 15: Do the proposed policy changes sufficiently provide for Māori interests in renewable electricity generation?

NZIA supports the inclusion of a dedicated policy recognising Māori interests and opportunities in REG. We view this as essential, particularly in relation to papakāinga energy sovereignty, culturally aligned development, and partnership approaches. NZIA also encourages clearer guidance for applicants on how to meaningfully engage with tangata whenua, including on design and site planning matters.

Question 16: Do you support the proposed policy to enable REG development in areas not protected by section 6 of the RMA or covered by other national direction?

NZIA supports enabling REG in appropriate environments but urges caution. Areas not protected under section 6 may still hold high community, aesthetic, or design value. NZIA recommends additional criteria or design guidance for REG development in such areas, to ensure outcomes reflect local context, landscape character and built environment quality.

Question 17: Do you support the inclusion of electricity distribution within the scope of the NPS-EN?

Yes. NZIA supports the inclusion of electricity distribution in the National Policy Statement on Electricity Networks (NPS-EN), provided that the same principles of good design, integration with land use, and community context apply. Members stress that the physical form and siting of infrastructure, such as substations and poles, can have significant visual and urban impact. Including distribution infrastructure must also bring stronger design accountability.



Part 3.1: National Environmental Standards for Granny Flats (Minor Residential Units)

Te Kāhui Whaihanga New Zealand Institute of Architects (NZIA) supports the Government's intention to make it easier to build high-quality, affordable housing, including granny flats, by streamlining consenting processes and improving national consistency. We share the Government's objective of enabling more housing choice and delivery.

However, to ensure long-term public good, it is essential that reforms do not lead to unintended outcomes that compromise the quality, safety, or cultural and environmental integrity of our built environment. In particular, we recommend clearer guidance and safeguards for matters such as infrastructure capacity, site-specific risks, heritage and character protection, urban character, and design oversight. With the right framework, these changes can support affordability, innovation, efficiency and equity in residential development.

We also recommend a clear definition of appropriate use, specifying that granny flats are intended to support long-term housing, not short-term rental income. Allowing unrestricted short-term rentals could undermine the objective of increasing genuine housing supply.

To support adaptive implementation, NZIA recommends that the NES-GF be subject to a mandated trial period or formal review after three years, to ensure that any unforeseen risks or implementation issues can be identified and addressed early.

We recommend reviewing the South Australian *Future Living Code Amendment*,¹ developed between 2021-2024 and formally adopted in 2025. This framework is based on previous *Bluefields Housing* research² and offers a tested, design-led approach to moderate suburban infill and could provide valuable insights for New Zealand's context.

This model supports gentle infill by allowing up to three or four smaller homes per lot while retaining suburban character, greenery and privacy, helping ease concerns about amenity loss. It promotes fast-track approvals for compliant dwellings, while excluding heritage or sensitive sites from blanket intensification. It also prioritises shared green space, good orientation, and landscape retention to support wellbeing and urban resilience. The goal is to help address affordability by creating more options for both homeowners and tenants.

In reviewing this policy, we recommend the following:

- Broadening the definitions within the NPS-GF consultation to incorporate the concept of co-located housing. This should not only include standalone granny flats, but also flexible

¹ Future Living Code Amendment SA [View code amendment | PlanSA](#)

² [What is Bluefield Housing? - Bluefield Housing](#)



dwellings and shared gardens as legitimate forms of ancillary accommodation. Recognising these diverse housing typologies will better reflect contemporary living arrangements, provide additional affordable small-scale housing options and support more inclusive urban development.

- Adopting the “Co-located Housing Overlay” model introduced in the *Future Living Code*. This overlay could serve as a strategic planning tool to guide where and how similar development are best integrated within suburban environments, ensuring alignment with local character and infrastructure capacity.

National standards can streamline the development of affordable granny flats by embedding clear, design-led policies within a unified planning framework. The approach establishes straightforward, context-sensitive criteria, such as self-contained design, retention of green space, and appropriate density, while also enabling minor dwellings to be added to existing dwellings efficiently without undermining neighbourhood character. It balances ease of approval through fast-tracked, “accepted development” processes with protections for heritage and sensitive sites. We recommend this example be used to support equitable, sustainable intensification while maintaining environmental and urban amenity.

Question 57. Are the proposed provisions in the NES-GF the best way to make it easier to build granny flats (minor residential units) in the resource management system?

Yes, the NZIA supports the proposed NES-GF in principle as an effective way to simplify consenting pathways and reduce regulatory burden. However, to avoid unintended negative impacts, NZIA recommends:

- Requiring a Land Information Memorandum (LIM) early in the process, so applicants are better informed about site-specific conditions.
- Ensuring district plans retain the ability to require consent in areas of cultural or environmental sensitivity (e.g. heritage and/or character overlays or hazard zones).
- Requiring oversight by a Licensed Building Practitioner (LBP) to monitor quality and compliance during construction.

Question 58. Do you support the proposed permitted activity standards for minor residential units?

Yes, in general. The proposed 70m² limit, setback requirements and coverage ratios are reasonable. However, NZIA recommends:

- Mandatory early access to LIMs and hazard data.
- Consideration of site permeability and stormwater mitigation as part of permitted activity conditions, particularly in flood-prone or intensifying urban areas.

Question 59. Do you support district plans being able to have more lenient standards for minor residential units?

Yes, with caution.



While the NZIA supports regional flexibility, we query how national consistency can be achieved if some district plans are significantly more lenient. We suggest national guidance to set baseline design quality expectations and encourage councils to adopt best practices, not just the minimum standard.

Lessons from South Australia's *Bluefields Housing* model show that national design standards, combined with contextual flexibility, can successfully streamline approvals, protect neighbourhood amenity, and ensure better environmental outcomes. A well-crafted NES provides clarity for homeowners, councils and designers, while still allowing local authorities to go further in enabling good-quality development in appropriate areas.

Question 60. Should the proposed NES-GF align, where appropriate, with the complementary building consent exemption proposal?

Yes. A more consistent, integrated approach between building and resource consenting systems will improve clarity and reduce costs. Alignment will be beneficial for both designers and applicants, as it provides certainty and reduces duplication.

Question 61. Do you support the proposed list of matters that local authorities may not regulate in relation to minor residential units? Should any additional matters be included?

Yes, with one exception. NZIA is concerned that heritage and special character values may be inadvertently overridden by this list. We recommend explicitly allowing territorial authorities to maintain regulation in:

- Ensuring that heritage or special character zones retain consent oversight to protect streetscape values and built heritage.
- Special character precincts or areas of significant cultural landscape value.

Question 62. Do you support existing district plan rules applying when one or more of the proposed permitted activity standards are not met?

Yes. Reverting to existing district plan rules where standards are not met provides a clear, predictable framework. However, we reiterate that national direction is needed for consistent treatment of heritage, character, and risk-prone sites to avoid the current fragmented approach between councils.

Question 63. Do you support the list of matters that are out of scope of the proposed NES-GF? Should any additional matters be included?

Yes. However, we recommend adding heritage protection explicitly to the list of matters that remain regulated under district plans. While s6(f) RMA applies, in practice heritage is treated inconsistently across the country.



Heritage values, for both individual buildings and wider character areas, could be undermined through a generic permitted activity framework. This is especially relevant where minor residential units (granny flats) could create unintended visual or structural issues. For example, a modern minor unit placed directly in front of a Category 1 heritage villa or within a special character area could materially compromise the visual coherence and value of the area, despite meeting the proposed permitted activity standards.

There is an opportunity to also consider adaptive reuse, as highlighted in the South Australian *Future Code Amendment* above, where we can integrate heritage with new development to support affordability, sustainability, and cultural value. In this way heritage and development can support one another, particularly as part of a broader strategy to create high-quality, enduring places. This balance can be achieved through clear, enforceable provisions in district plans. Refer to our response to Part 2.1: NPS – I Question 87 for further details on where adaptive reuse is utilised in policy and financial frameworks internationally.



Part 3.2: National Environmental Standards for Papakāinga

Te Kāhui Whaihanga New Zealand Institute of Architects (NZIA) supports the Government's proposed National Environmental Standards for Papakāinga as a timely and principled response to the structural barriers that have long constrained housing and community development on Māori land.

Our members have consistently called for planning settings that:

- Enable a greater diversity of housing models
- Respect indigenous approaches to land use
- Remove unnecessary consent requirements that delay or dilute development
- Promote shared living, sustainability and intergenerational wellbeing.

We consider papakāinga a vital expression of mana motuhake and a catalyst for social cohesion, environmental stewardship and housing supply. This reform aligns with our belief that design, and planning systems should serve all communities equitably.

Through permitting small-scale papakāinga and enabling shared infrastructure, the NES-P represents a meaningful recalibration of national planning priorities. The Institute supports the implementation of these changes and recommends expanding their application to support the reconnection of Māori with whenua held in general title.

Question 64. Do you support the proposal to permit papakāinga (subject to various conditions) on the types of land described above?

Yes. The NZIA supports the proposed provisions to permit papakāinga on specified categories of Māori land. We recognise the importance of re-establishing and sustaining Māori connections to whenua and see this reform as a meaningful step towards restoring autonomy and intergenerational wellbeing. These reforms align with the Institute's longstanding advocacy for policies that unlock housing supply and reduce regulatory friction, especially for whenua Māori developments. We urge that implementation respects tikanga Māori and supports mana motuhake over Māori-owned land.

Question 65. What additional non-residential activities to support papakāinga should be enabled through the NES-P?

We support an expanded scope for non-residential activities, including:

- We support enabling non-residential uses that are integral to papakāinga life, such as communal kitchens, meeting halls, health clinics, early childcare centres, offices for whānau trusts, shared amenities and small retail or food-producing activities. These align with the traditional multi-functional nature of papakāinga and directly support the wellbeing and self-determination of residents.
- Where non-residential activities are proposed, such as workshops, small-scale manufacturing or education facilities, these should be closely linked to and governed by mana whenua or



the papakāinga trust, ensuring alignment with Māori values and aspirations. Flexibility should exist to allow papakāinga to respond to local economic and cultural needs, such as māra kai (food gardens), rongoā (traditional medicine) production, or craft studios.

- These provisions should not include purely commercial or speculative enterprises unrelated to the wellbeing of papakāinga residents. This would include uses such as liquor, vape and tobacco retail, commercial uses that primarily serve private commercial purposes (e.g. AirBnB, large public carparks). Clear thresholds or criteria are needed to distinguish enabling community benefit from creating de facto commercial zones.

Question 66. What additional permitted activity standards for papakāinga should be included?

Additional standards should enable social cohesion and cultural expression through:

- Communal and shared-use buildings (e.g. kitchens, wharehau, club rooms)
- Structures that support intergenerational and inclusive living arrangements
- Flexible spatial layouts that accommodate tikanga and customary governance.

Question 67. Which, if any, rules from the underlying zone should apply to papakāinga developments?

While some standards (e.g. natural hazard management, lighting, wastewater) may be appropriate, certain underlying zone requirements, particularly boundary setbacks, should be reviewed. For returned land, restrictive setbacks may be inappropriate and undermine development potential. The NES-P should enable bespoke design responses appropriate to Māori land use rather than impose generic suburban norms. We recommend removing the provision of minimum setback.

Question 68. Should local authorities have restricted discretion over papakāinga on Treaty settlement land?

Yes. Restricting council discretion is critical to avoid delays, reduce administrative barriers, and ensure consistency across districts. Decision-making should be limited to clearly specified matters, with Treaty settlement land treated equitably with other categories of Māori land.

Question 69. What alternative approaches might help ensure that rules to enable papakāinga on general land are not misused?

We believe the risk of misuse is low, given the deep cultural connection and collective ownership models inherent in papakāinga. Nonetheless, eligibility criteria could include a demonstrable whakapapa link or collective governance structure. Rather than imposing restrictions, we suggest expanding the NES-P's scope to allow for reconnection with ancestral land, including whenua that has passed into general title.



Question 70. Should the NES-P specify that the land containing papakāinga on general land cannot be subdivided in future?

No. Subdivision is already addressed in planning rules. Singling out papakāinga would undermine the intent of these reforms, which is to return decision-making power to whānau and hapū. The NES-P should allow the existing frameworks and prioritise mana whakahaere over community land.



Part 3.3: National Policy Statement for Natural Hazards

Te Kāhui Whaihanga New Zealand Institute of Architects (NZIA) supports a risk-based and proportionate approach to managing natural hazards in the built environment. Architects have a unique and essential role in ensuring safe, resilient, and enduring places for people and communities. We advocate for clarity, consistency, and flexibility in national direction, particularly to support innovation in hazard mitigation, adaptive reuse, and to preserve heritage values where possible.

Architecture is a discipline of long-term thinking and coordination. As such, we urge national policy settings that support nuanced, evidence-based decisions that balance life safety, economic feasibility, sustainability, and cultural identity.

Question 71. Should the proposed NPS-NH apply to the seven hazards identified and allow local authorities to manage other natural hazard risks?

Yes. We believe the proposed scope is reasonable. Flexibility to address additional locally relevant hazards is appropriate and necessary to ensure localised resilience strategies are not constrained.

Question 72. Should the NPS-NH apply to all new subdivision, land use and development, and not to infrastructure and primary production?

Yes. It seems reasonable to apply to all new subdivision, land use, and development to ensure consistency of outcomes.

NZIA defers to sector experts on infrastructure and primary production but supports broad coverage for built environment developments.

Question 73. Would the proposed NPS-NH improve natural hazard risk management in New Zealand?

In principle, yes. However, clarity is essential. Lessons from implementation of earthquake-prone building standards show that unclear requirements can lead to overly conservative and costly compliance, particularly affecting heritage buildings. A well-articulated, transparent framework is critical to avoid misinterpretation and unintended demolition of valuable built heritage.

The NZIA also recommends the Government provides clear, nationally consistent guidance on climate change projection scenarios to support equitable and efficient risk assessments across jurisdictions. We encourage recognition of community-level resilience strategies and informed tolerance where they align with local risk appetite and mitigation planning. The system should allow



for culturally and contextually responsive outcomes, particularly where tangata whenua have a strong place-based relationship.

Question 74. Do you support the proposed policy to direct minimum components that a risk assessment must consider but allow local authorities to take a more comprehensive risk assessment process if they so wish?

Yes, in principle. Local authorities should have flexibility to consider local conditions, but the process for undertaking and disclosing such assessments must be transparent. Risk assessments should be available to the public through mechanisms such as LIMs, given their potential impact on valuation and insurability.

Question 75. How would the proposed provisions impact decision-making?

While they may increase the burden on applicants, the result may be higher quality outcomes. The risk lies in blunt, overly conservative enforcement that limits design flexibility, such as a single prescribed solution (e.g., detention tanks only) without considering innovative alternatives.

Question 76. Do you support the placement of very high, high, medium and low on the matrix?

Yes. We support the standardisation of risk definitions and the use of a national matrix. It provides a shared language for risk and will likely assist in creating consistency across regions.

Question 77. Do you support the definition of significant risk from natural hazards being defined as very high, high, medium risk, as depicted in the matrix?

Yes. This is a reasonable categorisation. It supports consistency and provides a helpful threshold for decision-making and required mitigation.

However, we urge caution that the 'medium or above' threshold for significant risk may unnecessarily capture a broad range of developments, leading to overly conservative or blanket restrictions. Implementation guidance should address this nuance.

Question 78. Should the risks of natural hazards to new subdivision, land use and development be managed proportionately to the level of natural hazard risk?

Yes. The NZIA strongly supports a proportional approach. This ensures that mitigation efforts and associated costs are aligned with actual risk, improving compliance, reducing waste, and enhancing overall resilience.

Question 79. How will the proposed proportionate management approach make a difference in terms of existing practice?



It could improve fairness and efficiency by aligning mitigation design and compliance costs with actual risk levels. This approach would also support innovation in design solutions, especially where risks are moderate but manageable.

Question 80. Should the proposed NPS-NH direct local authorities to use the best available information in planning and resource consent decision-making?

We support the direction to use the best available information but stress the need for consistent expectations. The definition of “best available information” must also be flexible to accommodate evolving technologies and datasets.

It is essential that applicants can use or supplement this with independently commissioned assessments, including contemporary or site-specific assessments. Consideration should be given to co-investment models or shared data frameworks between councils, insurers, and professional associations to avoid duplication and delays.

Question 81. What challenges, if any, would this approach generate?

Challenges may include access to current and regionally specific data, differing interpretations of “best available,” and added complexity in consent processes. Transparent guidance and resourcing for councils will be key.

Question 82. What additional support or guidance is needed to implement the proposed NPS-NH?

NZIA strongly supports the development of national guidance to accompany the NPS-NH, to avoid regional disparities. Clarity will reduce risk of overly conservative interpretation that could discourage good design and threaten heritage buildings.

This guidance should include:

- Clear definitions of what constitutes compliance with code minimums
- Model risk assessments, which includes worked examples of proportionate mitigation strategies
- Templates for LIM disclosures
- Allow alternative and innovative compliance pathways including nature-based solutions.