

14 August 2025

Te Tūāpapa Kura Kāinga
Ministry of Housing and Urban Development
Ministry for the Environment

Via email: gfhg@hud.govt.nz

Tēnā koutou

Canterbury Mayoral Forum submission on the Going for Housing Growth discussion paper

1. The Canterbury Mayoral Forum thanks the Ministry of Housing and Urban Development and the Ministry for the Environment for the opportunity to provide feedback on the Going for Housing Growth discussion paper.
2. We acknowledge that this is but one part of the significant reform of the resource management system and we appreciate the consideration of our views in bringing this together.
3. With that said, the effectiveness of Pillar 1 in *Going for Housing Growth* is inherently dependent on Pillars 2 and 3, as well as broader reforms across the resource management system, notably the Planning Bill and the National Policy Statement for Infrastructure. At this stage, it is difficult to fully understand how these proposals and changes will interact with each other and therefore this submission is unable to consider Pillar 1 holistically.
4. We have recently submitted on Te Waihanga Infrastructure Commission's *draft National Infrastructure Plan*, supporting spatial planning as a key tool for long-term, coordinated and integrated planning. We maintain that housing and infrastructure are irrefutably intertwined and anticipate that we will see this alignment in the Government's forthcoming change proposals.

Mayors standing together for Canterbury.

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Background and context

5. The Canterbury Mayoral Forum comprises the mayors of the ten territorial authorities in Canterbury and the Chair of the Canterbury Regional Council, supported by our chief executives. The purpose of the Forum is to promote collaboration across the region and increase the effectiveness of local government in meeting the needs of Canterbury's communities.
6. The eleven local authorities are: Kaikōura, Hurunui, Waimakariri, Selwyn, Ashburton, Timaru, Mackenzie, Waimate and Waitaki District Councils, the Christchurch City Council and Canterbury Regional Council.
7. The Canterbury Mayoral Forum published the Plan for Canterbury in 2023 with the following three key focus areas:
 - **Sustainable environmental management of our habitats** (land, air, water and ecosystems) – focusing on land use and freshwater management
 - **Shared prosperity for all our communities** – focusing on building on our economic strengths and developing emerging sectors, growing, attracting and retaining a skilled workforce, improving the transport network and coordinating strategies for housing our communities
 - **Climate change mitigation and adaptation** – reducing our carbon footprint, working together on climate action planning, building community resilience, and making our infrastructure as strong as it can be.
8. In this current triennium we will have finalised the Canterbury Climate Partnership Plan, Canterbury Energy Inventory and Waitaha Canterbury Regional Housing Strategic Plan.
9. We are also progressing with work towards the development of a potential future Regional Deal with Central Government. The current focus of this work is on housing, infrastructure, transport, and energy.

General Comments

10. The following submission has been developed with input from across Canterbury councils and focuses on matters of general agreement on specific elements of the discussion paper. Some of our councils, and the Greater Christchurch Partnership, will also provide individual submissions.
11. The Canterbury Mayoral Forum (CMF) agrees that change is needed in the resource management system to foster growth where appropriate. The current housing situation requires urgent attention.
12. There is a clear need for increased affordable housing options of varying typologies. We stress the importance of creating quality, affordable living environments, as we grow.
13. As a region, we support spatial planning as a tool to achieve long-term, coordinated, and integrated planning that supports the growth of Waitaha Canterbury in a fiscally prudent and sustainable way.
14. The CMF notes that it is not just our metro areas that have housing issues. It is important that going for housing growth strategy must also takes into consideration the housing pressures of our district and rural townships.

The new resource management system

15. The new resource management system presents a unique opportunity for it to be designed to support the achievement of desired outcomes, rather than focusing on perceived problems. The new system should promote coordinated, sequenced growth, aligned with spatial plans, and integrated with infrastructure planning. It should give councils stronger tools to manage and direct growth to the most appropriate locations, having regard to infrastructure availability, environmental capacity, natural hazards and resilience. It should deprioritise development in areas affected by natural hazards, or

where development would undermine well-functioning urban environments or significant infrastructure.

16. The system should support the integration of land use, infrastructure planning, and environmental management by facilitating land use decisions alongside infrastructure investment. In doing so, the new system should take a broad and integrated view of the infrastructure needed to support good housing and urban development outcomes. This includes transport and three waters infrastructure, as well as social and community services, urban greening, and provision for a range of housing sizes and types.
17. We support mechanisms that prioritise development within planned growth areas and discourage out-of-sequence land release. Should out of sequence development occur, we support ensuring that the additional infrastructure costs of this leapfrogging is borne by those undertaking the development (including wider network costs of out of sequence development), rather than the general ratepayer.
18. The new system should support evidence-based, demand-responsive infrastructure planning and avoid placing obligations on councils to over-invest or over-size infrastructure based on uncertain growth projections.
19. Building infrastructure to maximum capacity in anticipation of possible future development can lead to inefficient use of resources, stranded assets, and place an unsustainable burden on councils and communities. A more staged and coordinated approach is needed to align infrastructure delivery with the timing and scale of actual growth.
20. Well-functioning and high-quality urban environments must enable social, economic, and cultural wellbeing for the people who live there. We note this is not achieved through development capacity alone. We strongly support initiatives that have a community-centric focus, creating a liveable space and enabling people to move easily to the places they need to get to.
21. The CMF notes the Government's proposal for a new National Environmental Standard for Papakāinga, which aims to create more enabling settings for housing on whenua Māori. Greater responsiveness to new development proposals could support the rezoning or development of whenua Māori.
22. This new system must establish a planning framework that meaningfully supports the development and ongoing use of Māori land in both urban and rural settings. This includes addressing the underinvestment in infrastructure on whenua Māori and providing for a mix of activities and housing typologies.

Spatial planning

23. The CMF supports spatial planning as a key pillar of the new resource management system, with development of sub-regional spatial plans to be determined locally. We would like to see them carry greater weight in land use and regulatory decisions, and play a key role in informing transport and infrastructure planning and investment.
24. Spatial planning should play a central role in managing urban expansion by identifying where and when growth should occur, based on infrastructure capacity, environmental constraints (including productive soils), natural hazard risks, and community aspirations.
25. Spatial planning could provide an opportunity to simplify the consenting framework where development occurs in planned locations with sufficient infrastructure, and be closely aligned with government funding frameworks around core infrastructure and other central government funding processes.
26. The CMF supports spatial plans having a minimum 30-year planning horizon, with flexibility to consider some matters over a 50-year timeframe. Local authorities should be able to determine which matters warrant this extended outlook. We recommend maintaining some flexibility to pivot over time as relevant information on trends and projections becomes available.

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

Smart and strategic urban design

29. While increasing housing supply is important, it must be balanced with achieving good housing outcomes. The new system should enable a broader range of housing options that reflect local needs and cultural values. Planning frameworks must remain flexible to support diverse and affordable housing typologies.
30. In addition to development capacity, the creation of well-functioning, liveable urban environments should:
 - ensure new developments contribute positively to the wider urban area
 - provide access to services and infrastructure beyond the development site
 - identify how increased demand on services will be funded.
31. We support increased density around key public transport corridors and rapid transit routes. We recommend that spatial plans serve as the mechanism for identifying these corridors. This reflects that spatial plans offer a comprehensive and locally responsive approach to aligning land use with transport priorities.
32. We are seeing increasing variability in weather patterns, more frequent extreme events, and changing environmental conditions. It is essential that future developments are designed to be resilient to these changes – particularly in relation to flood risk, sea level rise, and water-sensitive urban design. Taking a proactive approach to reducing emissions and adapting to the changing climate helps safeguard communities, infrastructure, and investment, and ensures long-term sustainability.
33. The CMF has recognised the importance of blue-green network infrastructure in supporting good quality development outcomes and cost-effective stormwater management. This is a key action within the Canterbury Climate Partnership Plan.
34. The CMF urges caution around any proposals that would prevent councils from including provisions in their planning documents to manage leapfrogging (as noted above in paragraph 17). Leapfrog development can cause several major issues:
 - infrastructure challenges: leapfrogging often occurs in areas without existing infrastructure, leading to costly and unplanned extensions. It can leave councils with underused assets in areas where growth was originally intended and disrupt coordinated infrastructure planning
 - undermining strategic planning: it conflicts with the planned sequencing of urban growth, reducing the effectiveness of spatial planning and making it harder to align infrastructure investment with land use
 - environmental impacts: leapfrogging can push development into less suitable areas, such as productive rural land or sensitive environments. It may also rely on on-site wastewater systems, which can pose risks to water quality and be costly or unsuitable in the long-term
 - transport misalignment: development outside planned areas may not be supported by public transport infrastructure, making it harder to provide sustainable transport options
35. To address these concerns, the CMF supports:
 - retaining flexibility for councils to set infrastructure prerequisites for growth areas to be considered "development ready"
 - linking critical infrastructure identified in spatial plans to long-term funding plans

- ensuring infrastructure planning supports accessibility, connection, and wellbeing
- avoiding unplanned growth and leapfrogging that undermines strategic planning and increases costs

Funding and financing growth

36. The Government's *Going for Housing Growth* programme, particularly in Pillar 2, is a chance to improve how development is funded. We would like legislation enabling spatial planning to manage where and when growth happens and changes that strengthen the ability of councils to collect revenue through development levies or contributions in a timely and equitable manner.
37. Councils should not be required to allow development in areas where infrastructure isn't planned or funded, or where the cost of servicing would unfairly impact existing ratepayers. Any flexibility in the system must be tied to infrastructure availability, funding tools, and alignment with long-term plans.
38. Any unplanned or out-of-sequence development should only be considered if there is clear funding available for the necessary infrastructure—both within the development area and for the wider area. This includes consideration of the impact on the transport network, water systems, and the broad impact of an increase of impermeable surfaces.
39. Developers should contribute fairly, and councils need tools to recover costs in a timely and equitable way. The current mechanism for collecting development contributions can be slow, and with the Long-Term Plan requirements within the Local Government Act, any shortfall in estimates in turn falls on ratepayers to cover.
40. Ultimately, we would like to see legislation that supports spatial planning to manage where and when growth happens, and changes to the Local Government Act that strengthen councils' ability to collect revenue fairly and efficiently. In some cases, growth may not be able to fully pay for itself—this reinforces the need for planned growth and for councils to have the discretion to decline development where infrastructure and funding are not in place.

Local voice and equity

41. We strongly support a planning approach that considers not just growth and economic factors, but also the social, cultural, and environmental needs of our communities. People want to live in places that offer good amenities, a sense of belonging, and opportunities to contribute positively to their surroundings.
42. Maintaining public trust - especially for large or disruptive projects - is essential. This means involving communities early and meaningfully in planning decisions.
43. In Waitaha Canterbury, we work with ten papatipu rūnanga and Ngāi Tahu, who have a deep interest in how we plan for the future. These relationships are vital as our mana whenua partners, and also as partners in infrastructure and development, landowners, and community members. We support a te ao Māori approach to planning and decision-making.
44. We are concerned that national standards and zoning rules could reduce opportunities for local decision-making and meaningful input from mana whenua, especially in areas where policy has traditionally been shaped through local engagement.
45. Aligned housing and infrastructure planning can improve lives by making it easier for people to move around, connect with others, and access services that support health and wellbeing. Poor planning, however, can unintentionally exclude certain communities or groups.
46. Understanding Canterbury's housing needs, infrastructure capacity, labour market, and transport links is key to preserving the region's appeal - not just economically, but socially and culturally.
47. We have made progress in identifying our housing and infrastructure needs through work like the Canterbury Energy Inventory, the Waitaha Canterbury Regional Housing Strategic Plan, and the

Canterbury Climate Partnership Plan. Planning is also underway for the 2027 Regional Land Transport Plan, and we support ongoing work in flood protection.

48. Across all of this, we advocate for fair and equitable planning. Decisions should be based on more than just population size, which can unfairly favour urban areas. We also caution against relying solely on user-pays models, which may exclude those without the means or alternatives.
49. We strongly support local decision-making in setting priorities for new infrastructure and maintaining existing assets. Central government direction must allow flexibility for regional and local needs.

Conclusion

50. The Canterbury Mayoral Forum thanks you for the opportunity to comment on proposals to update the new resource management system.
51. We emphasise the importance of creating places where people want to live - places that offer easy movement, access to essential services, and vibrant local amenities.
52. We are happy to expand on any points covered in this submission. Please contact Amelia Wilkins at secretariat@canterburymayors.org.nz or on 027 243 4304.

Nāku iti noa, nā

A handwritten signature in blue ink, appearing to read 'Nigel Bowen', with a small dot at the end.

Nigel Bowen