



13 February 2026

Environment Committee
New Zealand Parliament

Re: Submission on the Planning Bill on behalf of Te Kāhui Whaihanga New Zealand Institute of Architects

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.

The NZIA strongly supports the Government's intent to reform the planning system through the Planning Bill. We agree that the current system's weaknesses are constraining the timely delivery of housing, infrastructure and well-functioning urban environments. We support the shift towards clearer national direction, earlier decision-making, and more standardised planning methods, where these improve certainty and reduce unnecessary cost and delay.

Our members work at the point where national policy is translated into local plans, consents, and built outcomes. They are directly involved in delivering housing, social and community infrastructure, education, healthcare, transport and civic projects across the country. From this position, architects see first-hand how planning frameworks either enable efficient delivery or create downstream delay through redesign, dispute and loss of confidence.

The NZIA considers the Planning Bill a significant opportunity to improve system performance by resolving key questions earlier, reducing reliance on case-by-case consenting, and providing greater clarity about what outcomes are expected and supported. We support reform that accelerates delivery while maintaining long-term value for communities, infrastructure providers and government.

This submission focuses on how the Planning Bill can best deliver on its objectives in practice. In particular, it identifies 14 refinements that would help ensure faster delivery is achieved through clear expectations, coordinated infrastructure planning, strong spatial frameworks, and early partnership with iwi and Māori.

Executive Summary

The Planning Bill represents a fundamental shift in how planning decisions are made, moving influence upstream into national goals, national direction and standardised methods. This creates a



real opportunity to improve speed and certainty, but also increases the importance of getting early decisions right.

The NZIA supports the intent of the Bill. However, its success will depend on whether it locks in quality outcomes, coordinated infrastructure planning, genuine partnership with iwi and Māori, and strong alignment between national direction and local delivery.

From the NZIA's experience, faster delivery is achieved when expectations are clear upfront, spatial planning resolves trade-offs early, and communities can see how growth will be well designed and supported. Where these elements are missing, projects slow due to dispute and loss of social licence, and ultimately developments need excessive redesign.

This submission sets out practical refinements to the current Planning Bill to ensure it delivers enduring value as well as speed.

The NZIA recommends that the Planning Bill be strengthened to:

- ensure early decision-making explicitly embeds design quality, sustainability, placemaking and long-term value, rather than deferring these matters to consenting
- prioritise infrastructure-led, intensification-first growth, with disciplined tests for greenfield expansion
- use robust spatial plans as the primary mechanism for master planning, infrastructure coordination and place-based outcomes
- embed durable, early partnership with iwi and Māori in shaping spatial structure and built outcomes
- improve cohesion between national direction, local planning and infrastructure delivery to build community confidence and reduce downstream delay.

Submission

The role of early national direction and system settings

The NZIA supports the intent of the Planning Bill to create a faster, more certain planning system through clearer national direction. The framework is designed to lock in key settings early, through national goals, national direction and standardised methods. This approach will only succeed if the *right* matters are resolved upfront.

Early decision-making must go beyond allocating development capacity. It must set clear expectations for quality outcomes, good design and long-term value, alongside meaningful recognition of Māori values and mātauranga Māori as they relate to place, built form and spatial structure.



If these matters are left to be addressed later through local plan-making or consenting, the system risks hard-wiring avoidable problems into national settings. In practice, this creates downstream delay through redesign, dispute, and loss of community confidence, directly undermining the Bill's objectives.

The NZIA's experience is that when expectations are clear upfront, consenting becomes a process of verification rather than negotiation. Design-led delivery tools support this shift. For example, pattern-book style approaches and pre-set design standards used in other jurisdictions have reduced friction for well-located, compliant housing by making outcomes clear and repeatable.

The NZIA therefore recommends that early-stage decision-making under the Planning Bill explicitly embeds:

1. Design and placemaking expectations that support long-term value rather than short-term expediency.
2. Outcome-focused measures that reflect community needs and coordinated infrastructure planning.
3. Treaty responsibilities and Māori interests as core system settings, not optional or deferred considerations.

Prioritise infrastructure-led growth to prevent sprawl

The NZIA supports enabling housing supply at scale, but strongly advocates an intensification-first approach to growth. Building within existing urban areas, where infrastructure and services already exist, is the fastest and most cost-effective way to deliver housing and support long-term affordability.

Unsequenced greenfield development imposes significant long-term costs on communities and government through duplicated infrastructure, higher servicing and maintenance costs, increased emissions and car dependency. These costs are often deferred, but they are real and enduring.

Planning systems that prioritise infrastructure-led growth perform better. Where development follows confirmed infrastructure capacity and funding, delivery is more predictable, fiscally disciplined and less contested.

[Australia's Plan Melbourne framework](#) provides a clear example. Housing growth is deliberately concentrated around established centres and transport corridors, aligning land use with infrastructure investment. This has reduced per-dwelling infrastructure costs, improved the viability of public transport, and limited outward sprawl while still enabling substantial housing supply.

We also point to [Oregon, which has established a flexible urban growth boundary](#). Greenfield development requires evidence-based decisions about where the city will grow to reduce



contestability and avoid unsequenced sprawl, with periodic reviews maintaining feasibility while preserving certainty.

The NZIA's experience across housing and infrastructure projects in Aotearoa New Zealand shows that uncertainty around spatial sequencing and infrastructure provision remains a major cause of delay, redesign and stalled development.

The NZIA recommends that the Planning Bill and associated national direction:

4. Prioritise intensification in locations with existing or committed infrastructure.
5. Require clear sequencing so development aligns with infrastructure capacity and investment.
6. Apply a disciplined test for greenfield expansion that considers whole-of-life infrastructure costs, emissions impacts and long-term community outcomes.

This approach supports faster delivery in the short term while avoiding higher costs and poorer outcomes over time.

Strengthen spatial plans as the engine of master planning and coordination

While standardised zones and rules can reduce friction, they are not sufficient on their own to deliver well-functioning urban environments, particularly in complex or fast-growing areas.

There is a risk that blanket zoning approaches will lead to fragmented, site-by-site development, infrastructure misalignment and community backlash. These issues slow delivery and increase uncertainty, even where development capacity exists in theory.

Spatial plans are the appropriate place to resolve growth trade-offs early and transparently. When done well, they provide a shared framework for land use, infrastructure, built form and public space, reducing reliance on ad hoc consenting debates.

Large-scale [Kāinga Ora-led urban regeneration projects](#) demonstrate the value of this approach. Where precinct-based spatial frameworks have clearly set upfront expectations for built form, access, open space and infrastructure, delivery has been more predictable and resulted in fewer consenting disputes than in areas reliant on zoning alone.

Recent experience in Auckland reinforces this point. The public response to [Plan Change 120](#) showed that blanket enabling provisions, without a clear precinct or suburb-scale master planning story, can quickly undermine confidence. Even where the policy intent is to focus growth in the right places, communities fear 'anything goes' intensification that is poorly coordinated, and poorly designed.

Spatial plans ensure communities can see how built form, amenity, trees and open space, sunlight, privacy, and infrastructure will be managed coherently across a neighbourhood. They close the gap



by making the outcomes visible upfront and reduce the risk of backlash, appeals and redesign later in the process.

Effective spatial plans:

- integrate land use with transport, three waters and social infrastructure
- establish clear expectations for built form, density, amenity and public realm outcomes
- provide certainty for both communities and developers about how growth will occur
- enable coordinated action across central and local government agencies
- integrate strong natural hazard and climate risk provisions
- integrate green infrastructure and nature-based solutions as standard
- integrate the urban form with emissions reduction and resilience objectives.

The NZIA recommends that the Planning Bill:

7. Strengthens and enforces the role of spatial plans so they operate as the primary mechanism for master planning, infrastructure coordination and place-based outcomes, rather than as high-level documents with limited practical effect.
8. Embed design leadership and infrastructure coordination as critical enablers of faster, more predictable delivery.

Build durable and effective partnerships with iwi and Māori

The NZIA understands placemaking is more than the arrangement of buildings and infrastructure. Successful communities are shaped by identity, meaning, and long-term relationships with the land. Indigenous perspectives bring a deep, place-based understanding of whenua, settlement patterns and stewardship that is directly relevant to creating coherent, distinctive and enduring environments.

The Institute supports national standards and frameworks that are underpinned by durable, early partnership with iwi and Māori at the points in the system where the most influential built environment decisions are made.

From a delivery perspective, the NZIA's experience is clear: where iwi and Māori are engaged late, inconsistently, or as an adjunct to technical decision-making, uncertainty increases. This often results in redesign, consenting delay, stalled implementation, and poorer outcomes for communities.

By contrast, early and durable partnership helps resolve issues upstream, clarify expectations, and build confidence in place-based outcomes. This supports smoother delivery and reduces downstream risk.

The NZIA therefore recommends that the Planning Bill:

9. Embeds partnerships with iwi and Māori early in national direction, standardised methods and outcome frameworks.



10. Provides clear and consistent expectations for Māori involvement as partners in shaping spatial planning tools, built form frameworks, and design expectations that shape place-based outcomes, actively enabling the integration of Māori values and mātauranga Māori.
11. Supports continuity and appropriate resourcing across planning transitions.

Faster delivery is achieved not by narrowing engagement, but by involving the right partners early and agreeing outcomes upfront.

Improving national–local cohesion and building community confidence

The NZIA sees first-hand the impacts of misalignment between national direction, local planning frameworks and infrastructure delivery. Where signals are inconsistent, projects slow, costs increase and confidence erodes.

Community opposition to growth is often mischaracterised as resistance to density. In practice, it is more often driven by uncertainty about what growth will look like, whether infrastructure will keep pace, and whether outcomes will improve everyday life.

Architects routinely manage the consequences of this misalignment through redesign and re-consenting. Intensification projects delivered without supporting spatial frameworks or infrastructure frequently encounter community opposition, appeals and subsequent plan changes, slowing delivery even where zoning technically enables growth.

By contrast, where councils have paired growth enablement with clear design guidance, infrastructure signalling and spatial frameworks, community resistance has been lower and delivery more predictable.

The NZIA recommends the Planning Bill strengthens mechanisms that:

12. Ensure national direction and spatial plans tell a clear, consistent story about growth.
13. Support councils to translate national policy into place-specific, design-led outcomes.
14. Resolve key design and infrastructure questions early in the system.

This is about building clarity and confidence upfront so that growth can proceed with fewer disputes, lower risk and greater certainty for all parties.

Conclusion

The NZIA supports reform of the planning system and recognises the need for faster, more certain delivery of housing and infrastructure. However, speed alone is not success.

From the perspective of architects working across Aotearoa, the fastest and most affordable outcomes are achieved where expectations are clear upfront, infrastructure is coordinated, partnership is genuine, and design quality is treated as a delivery tool rather than an afterthought.



The buildings and neighbourhoods enabled through this Bill will impact communities for decades. If we rush and get them wrong, we lock in higher whole-of-life costs. That can mean poor performance, avoidable maintenance and remediation, and expensive retrofits or redevelopment later to fix what should have been addressed upfront. With targeted refinements, the Planning Bill can deliver not just more development, but better communities at lower long-term cost. The NZIA welcomes the opportunity to continue working constructively with Government to help achieve this outcome.