

Property Council New Zealand

Submission to the Ministry of Cities, Environment, Regions and Transport on New Zealand's New Planning System: Testing the approach to National Policy Direction

16 October 2026

For more information and further queries, please contact
Samantha Lay Yee samantha@propertynz.co.nz 09 300 9580

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Ministry of Cities, Environment, Regions and Transport

Via online: <https://consult.environment.govt.nz/new-planning-system/testing-the-approach-illustrative-npd/consultation/>

Submission to the Ministry of Cities, Environment, Regions and Transport on New Zealand's New Planning System: Testing the approach to National Policy Direction

1. Summary

- 1.1. Property Council New Zealand ("Property Council") welcomes the opportunity to submit on New Zealand's Planning System: Testing the approach to National Policy Direction.
- 1.2. Property Council supports the development of an illustrative National Policy Direction ("NPD") as part of the new planning system. We have consistently advocated for a planning framework that provides greater certainty, enables development and investment, reduces unnecessary regulatory costs, and delivers economic and environmental outcomes through clear and proportionate rules.
- 1.3. We commend the Government and officials for undertaking a comprehensive overhaul of New Zealand's resource management system by enacting the Planning Act 2026 and Natural Environment Act 2026 and progressing the next steps to develop new national instruments.
- 1.4. Over the past eight years, Property Council, Employers' and Manufacturers' Association, Infrastructure New Zealand, Business New Zealand and the Environmental Defence Society have worked both collectively and individually to advocate for reform, and have engaged closely with the Ministry for the Environment (now Ministry of Cities, Environment, Regions and Transport ("MCERT")) in shaping changes to the planning system. We thank MCERT for working with Property Council constructively over these years, and we appreciate the proactive, direct engagement on the NPD.
- 1.5. Property Council considers the overall direction of the NPD to be positive. We support its emphasis on ensuring that regional spatial plans and other planning instruments enable housing and development, new and existing infrastructure, economic growth, investment, competitive land markets and the protection of existing lawful activities.
- 1.6. The NPD provides a useful indication of the Government's thinking at this stage, and it is encouraging to see a strong focus on enabling development, investment and economic growth. However, the success of the final NPD will depend on its quality as a practical decision-making instrument. It must provide sufficient clarity and direction to prevent strategic policy questions being reopened at the regional, local or consenting level.

- 1.7. We have suggested refinements to the NPD so that it can support councils and others involved in plan-making to make clear decisions that will minimise disputes and enable investment and development certainty.

2. Recommendations

- 2.1. At a high level, Property Council recommends the following:

- A. That CC-Directive 4 provides for the use of mitigation measures rather than separation to manage reverse sensitivity and other adverse effects from urban development;
- B. Amend HD-Directive 1.1(b)(ii) to be clear that land use plans must 'meet housing and business capacity requirements' as a minimum baseline;
- C. Amend HD-Directive 2.1(b) to acknowledge changing housing needs over time;
- D. Include definitions of 'very high', 'high' and 'medium' building heights and density in national standards, with cross-referencing in HD-Directive 2.2;
- E. Include definitions of 'abundant' development opportunities and 'sufficient intensification' of urban areas beyond urban centres in the Interpretation section.
- F. Amend HD-Directive 1.6 to also refer to conflicts between development and indigenous biodiversity;
- G. Amend PV-Directive 4.1 or develop national standards to include 'tiers' for categorisation of identified outstanding natural features, particularly wetlands and other freshwater bodies;
- H. Develop definitions or national standards which provide clarity around terms in PV-Directive 5.2 such as 'appropriate use' and 'managed to acceptable levels' to ensure development can proceed without unnecessary constraint;
- I. That the NPD includes reference to the National Infrastructure Plan and directives to resolve any conflicts, to reinforce the relationship between regional spatial planning and nationally significant infrastructure priorities;
- J. Amend the NPD definition of 'infrastructure' to include digital infrastructure (such as fibre networks and data centres), and to include other forms of natural hazard resilience infrastructure;
- K. Amend INFR-Directive 1.7 to ensure spatial plans and land use plans can effectively manage and resolve situations where a new infrastructure activity may compromise another planned or existing infrastructure activity;
- L. Amend HD-Directive 4.1 to enable housing and development where risk can be appropriately managed, while avoiding development where residual risk remains 'very high';

- M. That national standards include acceptable natural hazards resilience options, with regular updates to incorporate new engineering or management solutions;
- N. That PV-Directive 6.2 become a system-wide natural hazard directive to recognise the role of natural features and ecosystems in mitigating natural hazard risks; and
- O. That the final NPD be supported by quality implementation guidance and effective monitoring of whether councils are implementing it as intended.

3. Introduction to Property Council New Zealand

- 3.1. Property Council is the leading not-for-profit advocate for New Zealand's most significant industry, property. Our organisational purpose is, "Together, shaping cities where communities thrive."
- 3.2. The property sector shapes New Zealand's social, economic and environmental fabric. Property Council advocates for the creation and retention of a well-designed, functional and sustainable built environment, in order to contribute to the overall prosperity and well-being of New Zealand. We aim to support the development of a resource planning system that is both efficient and effective.
- 3.3. Property is New Zealand's largest industry and fastest-growing source of employment. There are nearly \$2.2 trillion in property assets nationwide, with property providing a direct contribution to GDP of \$50.2 billion (15 per cent) and employment for 235,030 New Zealanders every year.
- 3.4. Property Council is the collective voice of the property industry. We connect over 14,000 property professionals and represent the interests of over 610 member organisations across the private, public and charitable sectors.
- 3.5. This document provides Property Council's feedback on [New Zealand's Planning System: Testing the approach to National Policy Direction](#), with comments and recommendations on issues relevant to our members. Reflecting the diversity of our membership, Property Council members may wish to comment in greater detail on issues specific to their businesses. Accordingly, we support individual members providing separate submissions addressing those matters.

4. General comments

- 4.1. Property Council supports the introduction of a single, integrated NPD that will support councils in incorporating the goals of the Planning Act 2026 and Natural Environment Act 2026 into their new planning instruments. For the final NPD to be successful, it will need to provide certainty, consistency and national leadership.
- 4.2. We are comfortable with the overall approach and thematic structure of the NPD which classifies the provisions into a series of cross-cutting directives, five distinct themes that represent the key national priorities for the planning system, and two sets of system-

wide directives. The structure allows for effective navigation and understanding of the NPD.

4.3. We note many of the directives in the NPD reflect specific recommendations set out in Property Council's submissions on the National Direction packages in 2025. This includes explicit recognition of the role of infrastructure in supporting economic activity and productivity, and of the value of maintaining and optimising existing infrastructure, not just enabling new infrastructure. Directives on balancing infrastructure needs with environmental values when conflicts arise and enabling the use of measures that reduce natural hazard risk also reflect Property Council's prior recommendations.

4.4. However, the NPD should be amended further to:

- avoid ambiguous or discretionary tests,
- ensure directives are sufficiently specific to produce consistent outcomes,
- distinguish between matters that belong in the NPD and those better addressed through national standards,
- provide clear implementation direction to local authorities,
- recognise the role of developers and infrastructure providers in delivering outcomes, and
- avoid recreating the uncertainty, duplication and litigation associated with the current resource management system.

4.5. Clearly defining new words and terms in the NPD will support many of these matters. It will be important that ambiguous terms under the old system are not simply replaced with new, vague terminology. All new terms need clear and nationally consistent meanings to avoid costly litigation over interpretation. Certainty about regulatory settings supports our sector to have ongoing assurance that new projects are compliant, and confidence to invest and deliver the density and scale of development anticipated by local authority plans.

4.6. At this stage, it is difficult to judge whether the NPD provides enough direction about the hierarchy of activities and effects, and conflict-resolution mechanisms without also seeing more detail about the accompanying national standards.

5. Cross-cutting directives

Managing land use and reverse sensitivity

5.1. The continued use, redevelopment, expansion and adaptation of existing buildings and activities are fundamental aspects of urban development and creating thriving cities. This is particularly important given the long-term nature of property investment. Property Council therefore supports the principle that existing lawful activities should be protected from unreasonable constraints arising from subsequent development.

- 5.2. This needs to be balanced with the need to enable development on urban land that may have reverse sensitivity to existing activities. Acoustic treatment, landscape buffers and other site-specific, proportionate mitigation measures should be recognised as genuine alternatives to blunt tools like zone separation. The system should enable, but not default to setbacks, separation and avoidance where design can achieve the required outcome. The NPD needs to recognise that good architecture, design and engineering are legitimate ways to address adverse effects, particularly noise and visual amenity effects.
- 5.3. Given that HD-Directive 1.5 prevents the use of urban growth boundaries that create artificial scarcity, there will be more opportunity for urban activity to move into rural areas. It will be important for regional spatial plans to identify opportunities for urban expansion and to use transitional zoning provisions strategically to sequence the development of rural land.
- 5.4. Without this, there will be challenges in providing essential infrastructure and services to developments that are potentially out of sequence, including a greater risk of urban development ‘pockets’ in rural areas. Although such development patterns are not ideal, separation is an appropriate response to manage reverse sensitivity to rural activities in these circumstances, and we support PP-Directive 1.6.
- 5.5. **Recommendation A:** We recommend that CC-Directive 4 provides for the use of mitigation measures rather than default separation to manage reverse sensitivity and other adverse effects from urban development to ensure urban land can be used efficiently, while enabling existing activities to continue. We recognise that separation is appropriate to manage reverse sensitivity for urban activities in rural areas.

6. Housing and Development directives

Competitive urban land markets

- 6.1. Property Council strongly supports the directives under Theme 1 in the NPD, particularly Sub-theme 1: Competitive urban land markets. A key measure of the new planning system will be whether it enables land to be brought forward for development in response to demand.
- 6.2. The NPD should make it clear that ‘abundant’ development capacity in HD-Directive 1.1 needs to be more than theoretical. The term needs to be defined accurately to only encompass land that is realistically serviceable, accessible and commercially developable, that is, land infrastructure where can be provided at a cost that means development is still economically viable. There is little value in enabling development on paper if the cost of essential infrastructure is so prohibitively expensive that potential projects become unfeasible.

- 6.3. However, we support a planning framework that enables a range of development pathways, including intensification, brownfield redevelopment, greenfield expansion and mixed-use development. Infrastructure constraints should not automatically become a prohibition on development. Where water, transport, utilities (including electricity and telecommunications) and other essential infrastructure can be provided through sequencing, investment, developer-led provision or other appropriate mechanisms, local authority plans should enable that pathway.
- 6.4. The framing of HD-Directives 1.1(b)(i) and (ii) presents a potential conflict. Under the Planning Act 2026, councils are responsible for regulating and managing housing and business development capacity.¹ There is a risk that councils will consider that compliance with HD-Directive 1.1(b)(i) to ‘enable abundant development opportunities’ can be achieved by opening up just enough land to comply with HD-Directive 1.1(b)(ii) to ‘meet housing and business capacity requirements’.
- 6.5. Detail and guidance from the national standards and the competitive urban land market statutory officer will be important to clarify who is responsible for determining demand for developable land, and methods for doing so. To support planning and investment decisions, national standards could require councils to separately assess various types of development capacity including ‘plan-enabled’, ‘serviceable’, ‘commercially-feasible’, and ‘realisable capacity’.
- 6.6. **Recommendation B:** We recommend amending HD-Directive 1.1(b)(ii) to be clear that land use plans must ‘meet housing and business capacity requirements’ as a minimum baseline. The policy intent implies that enabling ‘abundant development opportunity’ is a higher threshold.

Well-functioning urban areas

- 6.7. Property Council supports the directives under Sub theme 2: Well-functioning urban areas. Enabling development both up and out gives people and businesses choices about where they want to locate. However, brownfield density should respond to actual accessibility, public transport, jobs, essential daily services and infrastructure capacity, and any urban centre zones need to be applied accordingly.
- 6.8. HD-Directive 2.1 ensures land use plans provide for different housing typologies to meet diverse household needs but it does not have a temporal element. In some urban areas, our members are experiencing increasing demand for housing that can accommodate multigenerational families and people with disabilities so families can take care of individuals with specific needs. As our population changes over time, it will be important

¹ Section 216(2)(g) of the Planning Act 2026.

for planning provisions to enable different housing models and typologies that can meet changing needs.

- 6.9. It is helpful for the NPD to provide direction about the type of density to be delivered around commercial hubs, but the level of detail in HD-Directive 2.2 seems better suited to national standards or other documents lower in the hierarchy that are yet to be developed.
- 6.10. In the national standards, it will be important that definitions of ‘very high’, ‘high’ and ‘moderate’ building heights and density account for regional differences and specific needs. When defining height limits, measurements should be generous enough to allow for ceiling heights above building code minimums (e.g. 2.4 metres for habitable rooms), particularly for ground-level units in multi-storey buildings.
- 6.11. The term ‘sufficient intensification’ in HD-Directive 2.3 needs to be defined in the final NPD. Similar to our points about defining ‘abundant’ development opportunities, the definition of ‘sufficient intensification’ needs to reflect realistic serviceability, access, infrastructure constraints and the costs of delivering infrastructure.
- 6.12. **Recommendation C:** We recommend amending HD-Directive 2.1(b) to acknowledge changing housing needs over time. Demand for different typologies in different locations will evolve and land use plans need to enable our sector to be responsive to community needs.
- 6.13. **Recommendation D:** We recommend including definitions of ‘very high’, ‘high’ and ‘medium’ building heights and density in national standards, with cross-referencing in HD-Directive 2.2. We recommend that any defined height limits account for floor heights above building code minimums.
- 6.14. **Recommendation E:** We recommend including definitions of ‘abundant’ development opportunities and ‘sufficient intensification’ of urban areas beyond urban centres in the Interpretation section. We recommend that the definitions refer to serviceable, developable land, not just theoretical plan-enabled capacity or intensification.

Resolving conflicts – resources and waste infrastructure

- 6.15. Theme 4 includes directives to achieve compatibility and resolve conflicts between urban development and mineral resources (RW-Directive 1.4) and the provision of waste infrastructure and services (RW-Directive 2.5). These direct councils to avoid enabling urban development in locations where it would prevent mineral extraction or future development of waste management infrastructure. We consider such limits on urban development to be appropriate.
- 6.16. As discussed in relation to *Cross-cutting directives* above, site-specific mitigation measures can effectively manage reverse sensitivity impacts for many activities.

However, our members agree that odours, air contaminants, noise and other adverse effects from mining, quarrying and waste management activities are most effectively managed through separation.

Resolving conflicts – High natural character and outstanding natural features

- 6.17. Property Council supports the premise of HD-Directive 1.6 and PV-Directive 4.2, which enable appropriate development in high value growing areas or areas of high natural character or outstanding natural features or landscapes areas, if it meets criteria set out in national standards. It will be important for the relevant criteria to be clear and workable.
- 6.18. Regarding conflicts between enabling urban development and protecting outstanding natural features, Property Council is particularly concerned about the management of wetlands under the new planning system. The current National Policy Statement for Freshwater Management (NPS-FM) and National Environmental Standards for Freshwater (NES-F), prioritise the retention of wetland extents and values, while applying a definition of ‘natural inland wetland’ that can capture land with very low ecological value. This includes land that has become waterlogged due to historical land uses rather than natural hydrological processes.
- 6.19. Some councils have applied the NPS-FM and NES-F in a manner that disproportionately impacts development. Requirements to protect small-scale, low-value wetlands have resulted in poor urban design outcomes. It is crucial for our sector to have clarity about the rationale for determining the ‘high natural character’ of an area or ‘outstanding’ nature of features and landscapes, as this can strongly influence investment decisions.
- 6.20. Establishing categories that reflect the ecological value of individual wetlands and other freshwater bodies would support proportionate protection, management and use. We support a ‘tiered’ categorisation approach, similar to PV-Directive 2.1(b) in relation to indigenous biodiversity.
- 6.21. **Recommendation F:** We recommend amending HD-Directive 1.6 to also refer to conflicts between development and indigenous biodiversity. This will ensure Theme 5 correctly cross-references Theme 1.
- 6.22. **Recommendation G:** We recommend amending PV-Directive 4.1 or developing national standards to include ‘tiers’ for categorisation of identified outstanding natural features, particularly wetlands and other freshwater bodies.

Resolving conflicts - significant historic heritage

- 6.23. Property Council generally supports PV-Directive 5.2 to protect historic heritage while enabling appropriate use and development. However, there is room for ambiguity when

considering what constitutes ‘appropriate use and development’ and managing adverse effects to ‘acceptable levels’.

6.24. Our members recognise the contribution of significant historic heritage to the cultural fabric and identity of our communities and built environments. However, protection for historic heritage needs to be applied in a targeted and proportionate manner, without unnecessarily constraining surrounding development. The term ‘significant’ needs to be defined so there is a clear and meaningful threshold for classification. For example, a cottage that was built in 1920 with no noteworthy heritage attributes should not be considered significant historic heritage.

6.25. **Recommendation H:** We recommend developing definitions or national standards which provide clarity around terms in PV-Directive 5.2 such as ‘appropriate use’ and ‘managed to acceptable levels’ to ‘significant historic heritage’ ensure development can proceed without unnecessary constraint.

7. Infrastructure directives

7.1. Property Council strongly supports the NPD's prioritisation of infrastructure. Infrastructure is fundamental to housing, economic growth, productivity and community well-being. Land use planning and infrastructure planning therefore need to operate as an integrated system.

7.2. This is consistent with Property Council's submission on the Planning Bill and Natural Environment Bill,² which supported Regional Spatial Plans as a means of providing clearer signals about growth areas, infrastructure corridors, sequencing and long-term investment priorities.

7.3. The NPD (or the national standards) should reinforce this relationship by referencing the National Infrastructure Plan and other national infrastructure priorities. This will ensure local planning does not frustrate nationally significant investment.

7.4. **Recommendation I:** We recommend that the NPD includes reference to the National Infrastructure Plan and directives to resolve any conflicts, to reinforce the relationship between regional spatial planning and nationally significant infrastructure priorities.

All infrastructure

7.5. We support the directives for regional spatial planning to identify where development is intended to occur and provide a realistic pathway for the infrastructure required to support it. We also support directives for infrastructure to be enabled where it has a functional or operational need to locate in a particular place, with environmental effects to be managed proportionately through design and mitigation.

² [Property Council submission to the Environment Select Committee on the Planning Bill and Natural Environment Bill](#)

- 7.6. Our members often note that local infrastructure is under-maintained, which can be linked to local government funding constraints. INFR-Directives 1.3 and 1.4 support our position that enabling the maintenance of existing infrastructure assets ensures we can maximise their value and support their long-term resilience.
- 7.7. The definition of ‘infrastructure’ in the interpretation section is very broad. It covers network and bulk infrastructure, as well as schools, early childhood centres, prisons, health facilities, waste disposal and resource recovery facilities, and other types of social infrastructure.
- 7.8. Despite this broad definition, the reference to telecommunications infrastructure is not wide enough to cover the types of infrastructure required for digital connectivity. While fibre broadband lines and mobile towers are covered, there is no provision for data centres. Physical infrastructure for digital connectivity is now essential to economic growth, productivity and community well-being.
- 7.9. Likewise, the definition needs to expand to include infrastructure associated with natural hazards resilience, beyond flood control and protection works. For example, infrastructure to manage coastal erosion or inundation, landslide or earthquake risk should also be included.
- 7.10. **Recommendation J:** We recommend amending the NPD definition of ‘infrastructure’ to include digital infrastructure (such as fibre networks and data centres), and to include other forms of natural hazard resilience infrastructure.

Resolve conflicts - Infrastructure, the natural environment and historic heritage

- 7.11. The NPD recognises infrastructure may have an operational or functional need to be located in particular environments. Property Council supports INFR-Directive 1.5, which requires land use plans and natural environment plans to ‘manage adverse effects in accordance with national standards’ rather than defaulting to an avoidance approach.
- 7.12. It will be important for national standards to provide pathways for balancing infrastructure needs with environmental values through remediation and mitigation.

Resolve conflicts - Infrastructure and other uses

- 7.13. INFR-Directive 1.7 seeks to achieve compatibility and resolve conflicts between infrastructure and other uses. The directive provides for co-location of compatible infrastructure activities, but it doesn’t specifically address conflicts between incompatible infrastructure activities.
- 7.14. While Property Council supports the inclusion of social infrastructure in the definition of ‘infrastructure’, it is important to recognise that traditional infrastructure is often strongly location dependent, while social infrastructure is typically more adaptable and can follow once essential facilities and networks are in place.

- 7.15. **Recommendation K:** We recommend amending INFR-Directive 1.7 to ensure spatial plans and land use plans can effectively manage and resolve situations where a new infrastructure activity may compromise another planned or existing infrastructure activity. Recognising the different location requirements and delivery dependencies of traditional infrastructure and social infrastructure will support consistent and effective decision-making.

8. System-wide natural hazard directives

Assess natural hazard risk

- 8.1. Clear national methodologies for risk assessment will be important. In the past, Property Council has highlighted the need for robust data and nationally consistent risk classifications and assessment frameworks that are sufficiently durable to provide investment certainty. This principle should apply to environmental values under the NPD. Where mapping or classification is required, it should be based on clear criteria, reliable information and defined processes for resolving disputes or correcting errors.
- 8.2. It is essential that the directives in the NPD and any relevant provisions in national standards are clear, specific, and prescriptive about how councils are expected to assess and manage natural hazard risks. This will ensure a consistent and nationally coherent approach, rather than leaving outcomes to the discretion or risk appetite of individual council officers.

Managing natural hazard risk proportionately

- 8.3. Property Council supports the use of a proportionate, risk-based approach to natural hazards and environmental management. In practice, we have seen some local authorities adopt overly restrictive or extreme interpretations of risk, which have led to unnecessary delays, added costs, and restrictions on otherwise appropriate development.
- 8.4. We read the system-wide natural hazard directives together with the theme-specific natural hazard sub-themes. In the context of infrastructure, primary production and public values, the NPD recognises that the existence of a hazard or environmental constraint does not necessarily mean that development is inappropriate.
- 8.5. However, the same principle doesn't apply to housing and development. Under HD-Directive 4.1, development must be avoided where risks are assessed as 'very high'. The appropriate response should depend on the nature, scale and significance of the risk or value, the availability of effective mitigation, and the level of residual risk.
- 8.6. This is particularly important for urban areas where existing housing and development, infrastructure and investment may already be exposed to hazards. A system based on avoidance could prevent sensible redevelopment and resilience improvements. With

the right planning tools and mitigation measures, housing and other types of development can be delivered safely, even in areas subject to certain natural hazards.

- 8.7. Master-planned brownfield redevelopment projects incorporating water-sensitive design, such as Roskill South and Northcote in Auckland, successfully protected people and property from flooding during the extreme storm events of 2023. Blue-green infrastructure, green roofs, planted façades, rain gardens, wetlands, and tree canopy need to be recognised as valid ways of achieving environmental and hazard outcomes. However, these should not be a requirement for every type of development or activity.
- 8.8. **Recommendation L:** We recommend amending HD-Directive 4.1 to enable housing and development where risk can be appropriately managed, while avoiding development where residual risk remains ‘very high’.
- 8.9. **Recommendation M:** We recommend that national standards include acceptable natural hazards resilience options, with regular updates to incorporate new engineering or management solutions. This will provide clarity and certainty to councils when making consenting decisions and to developers when making design and investment decisions.
- 8.10. **Recommendation N:** We recommend that PV-Directive 6.2 become a system-wide natural hazard directive. The role of natural features and ecosystems in mitigating natural hazard risks needs to be recognised in local government plans, in the context of all themes, not just activities that improve public values.

9. Implementation and system performance

- 9.1. Property Council welcomes the stronger emphasis on centralised guidance, monitoring and accountability in the new planning system. The final NPD will only achieve its intended outcomes if it is implemented consistently by local authorities. The broad exercise of local discretion under the current resource management system has contributed to fragmented rules, inconsistent outcomes and higher compliance costs.
- 9.2. The new system should not allow nationally prescribed requirements to be undermined through local processes or interpretation. National direction and nationally standardised rules should be supported by safeguards against repeated assessments and other practices that cause avoidable delays.
- 9.3. Guidance and performance monitoring that account for the limited capacity of smaller councils and the complexity of larger councils will encourage effective delivery of the new system.
- 9.4. **Recommendation O:** We recommend that the final NPD be supported by quality implementation guidance and effective monitoring of whether councils are implementing it as intended. This should include transparent reporting of consent and

plan change processing times and performance, and other measures that allow performance to be compared across regions.

10. Conclusion

- 10.1. Property Council members invest, own, and develop property across New Zealand. We thank Ministry of Cities, Environment, Regions and Transport for the opportunity to submit our views on the New Zealand's New Planning System: Testing the approach to National Policy Direction.
- 10.2. We support the overall direction of the NPD. We endorse its emphasis on ensuring that regional spatial plans and other planning instruments will enable housing and development, new and existing infrastructure, economic growth, and the protection of existing lawful activities.
- 10.3. However, the success of the final NPD will require accuracy and clarity to prevent strategic policy questions being reopened at the regional, local or consenting level. We consider refinements will be necessary to ensure the final NPD can support councils to make consistent decisions that will minimise disputes and enable investment and development certainty.
- 10.4. For further enquiries, please do not hesitate to contact Samantha Lay Yee, Senior Advocacy Advisor, via email: samantha@propertynz.co.nz.

Yours Sincerely,



Leonie Freeman

Chief Executive

Property Council New Zealand