

New Zealand Property Investors Federation

Submission on the Planning Bill (Government Bill 235—1)

To: Environment Committee, New Zealand Parliament

From: New Zealand Property Investors Federation (NZPIF)

Date: 13 February 2026

Who we are

NZPIF is a membership organisation representing the interests of the over 300,000 property investors/landlords across Aotearoa. We are the peak body which operates at a national level, backed by a network of 17 local associations. We provide support, education and advocacy on behalf of our members and the wider property investor / landlord community.

Private residential landlords provide the lion's share of New Zealand's rental homes. NZPIF is committed to working with all stakeholders to deliver a well-functioning housing market where people who want to buy can buy, and those who want or need to rent can find decent, affordable accommodation.

Executive summary

- The current planning system is too complex, slow and inconsistent across councils.
- The Planning Bill's direction - fewer consents, clearer national direction and standardisation, and a narrower scope of effects - will help unlock housing supply and reduce costs.
- We support the Bill and recommend targeted refinements: binding timeframes; make national standards the default; further narrow subjective amenity/character tests; codify proportionate consent conditions; and front-load housing national direction and standards.

Our overall position

Our members regularly report abandoning projects that would have replaced old, run-down houses with warm, compliant homes because consenting pathways are uncertain, expensive, and open-ended. Homes that could have been built were not built, hurting both renters and first-home buyers. Our members also frequently report time delays and additional cost because of the planning process, which increase rental costs. Eliminating these impacts will add to the housing supply and reduce the cost of renting.

What we support in the Bill

1. Fewer consents and narrowed effects
2. National direction and standardisation (one combined plan per region)
3. Streamlined plan-making and consenting (targeted participation; simplified activity classes)
4. Regulatory relief where planning controls impose significant burdens

Where the Bill should go further – our recommendations

1. Hard time limits and accountability (binding statutory timeframes; KPIs; fee rebates/default approvals if missed)
2. Nationally standardised provisions as the default; high bar for bespoke local departures
3. Further narrowing of subjective amenity/character tests
4. Proportionate, necessary consent conditions with a quick path to strike out over-reach at the Planning Tribunal
5. Early, housing-first national direction and standards

Clause-by-clause commentary

Part 1 — Purpose, Goals and Principles

Purpose

Support. The purpose - 'to establish a framework for planning and regulating the use, development, and enjoyment of land' - is clear and enabling. It moves towards predictable rules that give investors certainty to commit capital to redevelopment projects. We support retaining this concise purpose.

Goals

Support (with emphasis). We strongly support the goals to (i) enable use and development of land, (ii) create well-functioning urban areas, (iii) enable competitive urban land markets, and (iv) plan and provide for infrastructure. Maintain a clear, non-hierarchical reading but ensure early national policy direction prioritises housing enablement during implementation.

Procedural principles

Support (strengthen). Principles requiring decisions to be timely, proportionate and evidence-based are essential. Recommend binding statutory timeframes for plans and consents, paired with public KPIs and fee rebates/default approvals for missed deadlines.

Part 2 — System Architecture (the ‘funnel’) & National Instruments

System architecture

Support. A tighter ‘funnel’—goals → National Policy Direction (NPD) → national standards → combined regional plans—will reduce re-litigation and produce consistent, front-loaded rules so consenting is faster and more certain.

National instruments

Support (tighten default). Strong national direction and nationally standardised zones/rules should end fragmentation. Make national content the default; require a high bar and an independent evidence test for bespoke local departures.

Part 3 — Effects Management

Narrowed scope of effects & thresholds

Strong support. Excluding internal site matters, private views, competition effects, and subjective character/amenity (outside ONLs, significant heritage and specified natural areas) and raising notification/affected-party thresholds will reduce costs, delays, and uncertainty. Retain and clarify to avoid re-expansion via case law.

Proportionate management of effects

Support (codify test). Back the avoid/minimise/remedy framework with offsets/compensation where appropriate provided it remains effects-focused and proportionate. Codify a necessity and proportionality test for any consent condition and enable the Planning Tribunal to strike out conditions beyond scope or necessity.

Part 4 — Regional Combined Plans (Spatial, Land-use, Natural Environment)

One combined plan per region

Support. Reducing more than 100 plans to 17 combined plans promises consistent rules and less duplication. Retain tight statutory timeframes for first-generation plans and monitor delivery.

Spatial planning

Support with safeguards. 30-year spatial plans integrating housing, infrastructure and environmental limits are valuable, but must front-load capacity near jobs and transport and avoid over-zoning of constraints. National instruments should require capacity targets and delivery monitoring.

Land-use plan-making

Support (standardisation first). Back the two tracks (standardised vs bespoke). Bespoke provisions should face strict justification, independent review, and full merits appeals, while

standardised content should be largely immune from re-litigation to preserve certainty and speed.

Part 5 — Regulatory Relief

Justification & relief tools

Strong support. Councils must justify protective controls property-by-property and provide relief (rates relief, bonus rights, fee waivers, grants/cash, swaps) where impacts are significant. Recommend clear eligibility thresholds, a fast, low-cost appeal to the Planning Tribunal, and annual public reporting on relief decisions.

Part 6 — Consenting System

Activity classes, participation & notification

Support. Simplified classes (permitted, restricted discretionary, discretionary, prohibited) plus targeted participation for materially affected parties and a higher notification bar will reduce churn. Keep these provisions intact.

Conditions & information scope

Support (tighten). Embed an explicit ‘necessary, relevant, and proportionate’ statutory test for conditions and strict information scope aligned to actual effects. Empower the Planning Tribunal to remove out-of-scope conditions swiftly.

Part 7 — Governance, Powers and Accountability

Ministerial powers & stewardship

Support (with accountability overlay). Active central oversight is appropriate. Pair with transparent KPIs and published league tables on plan-making timeliness, consent timeframes, costs, and appeals outcomes.

EPA enforcement role

Support (proportionate). The EPA’s ability to support or take enforcement should be used sparingly and proportionately, so it doesn’t recreate unpredictable consenting risk for compliant housing projects.

Part 8 — Dispute Resolution and Appeals

Planning Tribunal

Support (expand targeted remit). A low-cost, fast forum to resolve administrative/process disputes is essential. Recommend clear time limits (e.g., 20–30 working days) and the power to quash or amend conditions that fail the statutory tests.

Environment Court

Support. Keep complex, merits-heavy matters in the Court while pushing routine disputes to the Tribunal to ensure most housing projects proceed without lengthy litigation.

Transitional & Implementation

Staging of NPD & first-generation plans

Support (front-load housing). Prioritise early national direction on housing and infrastructure (zoning typologies, baseline standards, mixed-use enablement) so combined plans cannot dilute enablement during transition. Track delivery against capacity and consenting metrics.

Summary of recommendations

- Retain narrowed effects scope and higher notification thresholds; clarify exclusions to prevent re-expansion of subjective amenity/character tests.
- Make national standards the default; require an independent, evidence-based case for any bespoke local rule.
- Bind timeframes for plan-making and consents; publish KPIs; enable fee rebates/default approvals for missed deadlines.
- Codify proportionality for consent conditions and empower the Planning Tribunal to strike out over-reach rapidly.
- Operationalise regulatory relief with clear eligibility thresholds, fast appeal rights, and public reporting.
- Front-load housing NPD/standards to ensure rapid, nationwide enablement.

Contact

For questions about this submission:

Matt Ball – PR & Advocacy Manager, New Zealand Property Investors Federation

Email: pr@nzpif.org.nz | Phone: +64 21 495 645