

21 September 2025

## **Infrastructure New Zealand's Submission on the draft Government Policy Statement on Housing and Urban Development 2025.**

### **1. Introduction**

- 1.1 Infrastructure New Zealand (INZ) welcomes this opportunity to provide feedback to the Ministry for Housing and Urban Development on the Draft Government Policy Statement on Housing and Urban Development 2025 (GPS-HUD).
- 1.2 INZ is Aotearoa's peak membership organisation for the infrastructure sector. We promote best practice in national infrastructure development through research, advocacy, and public and private sector collaboration. Our membership is comprised of around 150 organisations, including government agencies, consultants, contractors, financiers, utilities, and academics. These organisations employ approximately 150,000 people in infrastructure-related roles and are united in their commitment to creating a better New Zealand through outstanding infrastructure.
- 1.3 This submission represents the views of INZ as a collective whole and may not necessarily represent the views of individual member organisations. We have encouraged members to provide their own submissions to raise issues specific to their expertise and areas of interest.

### **2. General Comments**

- 2.1 INZ supports the GPS-HUD vision and the framework that sits below this. The overall intent of the GPS-HUD and its proposals is to increase the supply of housing in Aotearoa New Zealand. We also recognise the close relationship between housing provision and infrastructure and are pleased to see this critical connection being addressed.

- 2.2 We support the long-term outcomes and consider that the 30 year timeframe is realistic and coincides with the period of long term plans. We also support the short to medium outcomes and the Government’s priorities through the Going for Housing Growth package. The requirement for councils to have future housing capacity included in their district plans and the strengthening of urban intensification requirements is necessary to make progress. We note that these proposals will be implemented via amendments to the resource management system.
- 2.3 There needs to be a coordinated reform roadmap which aligns the GPS-HUD with other reforms currently underway such as the RMA reform (including the new and amendment National Direction), Local Water Done Well, the building system reform, the National Policy Statement - Urban Development, and the National Infrastructure Plan.
- 2.4 We have focussed our feedback on specific points of interest but have not responded to the discussion document in its entirety.

### 3 Part one: Long – term direction

- 3.1 INZ strongly supports the four outcomes proposed.
- 3.2 *An adaptive and responsive system* comprises four elements which INZ supports. While infrastructure can be responsive to demand, it is also critical that there is adequate lead time. We need to align housing growth with infrastructure capacity. **Infrastructure readiness** must be central to any housing growth strategy. Land release or intensification without delivering essential infrastructure (water, wastewater, transport, energy, digital) undermines both quality of life and project feasibility.
- 3.3 Plans should require **infrastructure feasibility at the outset**, and grant “development-ready” status only where infrastructure capacity and delivery are assured.
- 3.4 INZ supports a principle that intensification (redevelopment, infill) is preferred over outward greenfield expansion, especially where infrastructure already exists or can be upgraded more efficiently. Making better use of our existing infrastructure needs to be a cornerstone of urban development, especially as there are significant mass transit network investments underway in Auckland. INZ supports compact cities as they reduce per-household infrastructure costs, and spatial efficiency.
- 3.5 We also strongly support a partnership approach with central and local government working with and investing with Māori to develop the housing and community facilities needed. Other public and private community housing partners should also be part of the mix.

- 3.6 *Thriving and resilient communities* need not only physical infrastructure to support them but also community and social infrastructure. Transport that gets people to where they need to go quickly, efficiently and must be **affordable** also. Resilience to climate change impacts is also critical and needs to be supported through strong planning mechanisms.
- 3.7 INZ strongly supports decision-making using excellent evidence and data. There needs to be stronger use of nationally consistent **engineering and planning standards**, definitions, terminologies, and data sources. This will reduce delays and legal disputes and help ensure equity across regions. Council access to quality data and standards must be supported (including funding where necessary).

## 4 Part two: Government priorities

- 4.1 INZ supports the Government's five housing and urban development priorities particularly the first two priorities:

- Going for Housing Growth
- reforming the resource management system

### *Going for Housing Growth*

- 4.2 The Going for Housing Growth pillars two and three are critical to addressing the infrastructure deficit that is needed to support increased housing supply across the country.
- 4.3 The *Infrastructure Financing and Funding Act* mechanisms need to be clear and equitable for infrastructure tied to housing growth e.g. development levies which adequately cover future infrastructure and community facilities, pooled infrastructure funds, growth infrastructure bonds and value capture. However, it will also be important to avoid an overreliance on "growth paying for growth" without some central government support. The third pillar which looks to provide some incentives for communities and councils is critical not only to support the development of infrastructure ahead of housing development but also to maintain the social licence for growing communities.

### *Reforming the Resource Management System*

- 4.4 We see the Resource Management Act reforms critical to achieving these outcomes also. The inclusion of future development strategies within spatial plans under the Planning Act will be an essential tool to provide for critical infrastructure, housing, urban development, commercial and industrial requirements at both a regional level and sub-regional level. There needs to be strong alignment of housing, infrastructure and investment if we are to avoid housing developments

without basic infrastructure such as water services or investing in infrastructure in sites where housing development is severely lagging.

- 4.5 Spatial plans should build on work already undertaken in regions. However, longer time horizons are required for key strategic infrastructure. A minimum of 30 years is necessary, with 50 years preferable, and up to 100 years for infrastructure in coastal areas subject to sea-level rise. This helps guide investment in strategic infrastructure (e.g. transport corridors, water treatment plants, flood defences).
- 4.6 Additionally, infrastructure such as electricity networks, water services, transport, and communications infrastructure must be explicitly recognised in intensification standards and planning to preserve their safety and function.
- 4.7 INZ supports realistic minimum infrastructure content requirements in spatial plan, covering all infrastructure types required to support growth areas in the short, medium, and long term. We also support flexibility to require prerequisite infrastructure for a growth area to be deemed 'development ready'. This ensures visibility of critical services and supports integrated service delivery.

#### *Better Integration Between Central and Local Government*

- 4.8 Many reform programmes are hitting local government simultaneously (e.g. RMA reform, building system reform, Water Services Entities reforms). Councils have responsibility for much of the implementation of these significant system changes, and not all have the resources and capability to deliver on these.
- 4.9 There needs to be clear, phased implementation plans with resourcing support to local government, to avoid inconsistency, delays, or inconsistent application. Central government needs to be able to assist local implementation and be proactive in this respect.

Michelle McCormick

**Policy Director**

**Infrastructure New Zealand**

[office@infrastructure.org.nz](mailto:office@infrastructure.org.nz)