



# Registered Master Builders Association of New Zealand Incorporated

## Submission on Planning Bill and Natural Environment Bill

February 2026

## The Registered Master Builders Association submission on Planning Bill and Natural Environment Bill

The Registered Master Builders Association (Master Builders) welcomes the opportunity to submit to the Environment Committee on *Planning Bill and Natural Environment Bill*.

### About Master Builders

Master Builders represents over 3,000 commercial and residential builders and are the leading sector advocates on the built environment. Our members have been building the places where New Zealanders live, work, and play, since 1982.

Our sector is a key contributor to the New Zealand economy. For the year ended March 2024, the construction sector contributed 6.2 per cent of the country's real Gross Domestic Product (GDP) accounting to over \$17.2 billion<sup>1</sup>. It also employed 294,100 people (or 10 per cent of the country's total workforce) in the year ended September 2024<sup>2</sup>.

We are working hard to lead the change our sector needs by ensuring we have the regulatory systems and processes in place to build faster and better. We are supporting our members to grow their capability and business acumen to ensure a strong and healthy sector; to innovate and make the most of new technologies so we meet the climate change challenge; and to attract, train and retain skilled talent. We are proud to be New Zealand's best builders.

At Master Builders we are committed to transforming the sector and rebuilding our economy. We are focused on building better homes, communities and workplaces, and ultimately better lives for all New Zealanders. We want to ensure that the houses that we build now are well-built, accessible, affordable, and appropriate to the needs of our ever-changing society. We are building a better New Zealand.

Our members are supported on the ground by 23 branches across 6 regional hubs:

Branch hub	Serving
Auckland	Auckland, Northland, Coromandel
Midlands	Waikato, Tauranga, Whakatāne, Rotorua, Taupō
Central North Island	Taranaki, Whanganui, Hawke's Bay, Manawatū, Gisborne
Cook Strait	Wellington, Wairarapa, Nelson, Marlborough, West Coast
Canterbury	Canterbury, Ashburton, South Canterbury
Southern	Otago, Central Otago, Gore, Southland

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<sup>1</sup> Statistics New Zealand – Infoshare: Gross domestic product – March 2024

<sup>2</sup> Statistics New Zealand – Infoshare: Household Labour Force Suvey – September 2024

## **1. Executive Summary**

- 1.1 Master Builders welcomes the opportunity to make a submission on the Planning Bill and Natural Environment Bill and recommends that both Bills proceed, subject to careful consideration of the issues raised in this submission. These two Bills represent a once-in-a-generation reform to replace the broken Resource Management Act 1991 (RMA) with a more efficient, predictable system that enables development while safeguarding the environment.
- 1.2 We agree that New Zealand urgently needs a modern resource management system that unlocks development capacity for housing and infrastructure and protects our natural environment and community well-being.
- 1.3 Our members have first-hand experience with the RMA's complexity, protracted consent processes, and inconsistent local planning rules acting as barriers to building the homes and infrastructure New Zealanders need. We acknowledge the emphasis in the Bills on a proportionate response and focused approach to managing effects, which currently hinders land and development in the economy.
- 1.4 We are encouraged that the proposed new system addresses these issues by reducing consenting complexity and increasing consistency nationwide. We in particular welcome the Bills' emphasis on clearer national direction, streamlined planning and consenting, and a better balance between environmental limits and development. If implemented well, these reforms will enable us to build more homes and communities faster, without compromising environmental standards.
- 1.5 One of the key drivers for reform is to reduce the cost of and time for consenting major infrastructure and development projects. A 2021 report for the Infrastructure Commission<sup>3</sup> estimated that current consenting processes for infrastructure projects cost \$1.29 billion per year and that it took nearly twice as long to get a resource consent for key projects as it did five years before. Note, this estimate considered only RMA processes. It did not include the costs of other conservation-related legislation. It included only infrastructure projects – it did not include projects such as housing, mining or aquaculture etc.
- 1.6 We recommend several refinements and implementation measures to ensure the new system succeeds in practice. These recommendations are outlined below and then elaborated in Section 2 on specific provisions of the Bills.

## **2. Key Recommendations**

- 2.1 Recommendation 1: That the Planning Bill and Natural Environment Bill proceed to implement the urgently needed resource management reforms. These Bills are crucial to creating a more efficient, consistent planning system that enables development while protecting the environment.
- 2.2 Recommendation 2: That strong national direction and the one regulatory plan per region framework be implemented on schedule with prompt development of National Policy Direction (NPD) and standards, and adequate resourcing and guidance for councils to ensure the new

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<sup>3</sup> Sapere Research Group, [The Cost of Consenting of Infrastructure Projects in New Zealand](#) (July 2021), p. 2.

system is up and running without delay. Timely national instruments and well-supported council implementation are critical to a smooth transition.

- 2.3 Recommendation 3: That the new planning system's standardised zones, templates, and rules be adopted uniformly, with any local deviations strictly limited and evidence-based, in order to create a consistent and predictable planning environment across the country. Builders operating in different districts should no longer have to navigate completely different rulebooks for similar projects except where unique local conditions truly warrant it.
- 2.4 Recommendation 4: That resource consenting processes be streamlined by focusing on activities with significant effects raising consent thresholds so that minor effects are generally permitted thereby reducing the number of consents required and eliminating unnecessary delays for low-impact projects. This will free up time and resources to concentrate on proposals that genuinely need scrutiny.
- 2.5 Recommendation 5: That public participation be concentrated at the council planning-making stage with notification and submissions on individual resource consents limited to those directly affected and to proposals with more-than-minor effects.
- 2.6 Recommendation 6: That the new combined planning framework actively provide sufficient development capacity for housing and business growth. Regional plans (particularly their land-use components) should ensure enough land is zoned (and up-zoned when necessary) to meet current and future demand for housing and infrastructure. Enabling well-planned growth through zoning and spatial planning is essential to address New Zealand's housing shortage and support economic development.
- 2.7 Recommendation 7: That the proposed Planning Tribunal be established and resourced to effectively deliver on its mandate of fast, low-cost resolution of planning and consent disputes. It is important to ensure this Tribunal can promptly address minor technical appeals such as objections to consent conditions or notification decisions so that such issues do not stall projects for lengthy periods.
- 2.8 Recommendation 8: That clear national guidance on the regulatory relief provisions be developed including definitions of what constitutes a significant impact on land use and how to calculate appropriate relief to ensure councils apply these measures consistently and fairly across all regions. Where councils impose restrictive controls that significantly limit private land use, affected owners should receive relief in the form of compensation or other mitigation assessed under uniform criteria.

### **3. Shared Provisions in Both Bills – Planning Framework and Institutions**

- 3.1 A core feature of the new system is the introduction of stronger national direction through National Policy Direction (NPD) and national standards under both the Planning Act and Natural Environment Act.
- 3.2 We support this move toward a centrally guided, standardised planning framework. Under the Bills, central government will set clear goals and detailed direction that local plans must implement, creating a hierarchy of instruments from national to regional level. We agree that providing standardised planning provisions, rules and methodologies will yield a more uniform and predictable system for everyone.

- 3.3 Previously a builder working across two different districts might have faced completely different planning rules for the same type of project, under the new framework, such inconsistencies should be greatly reduced. A consistent national rulebook with limited room for unjustified local variation will improve certainty and reduce compliance costs for builders operating in different regions.
- 3.4 Equally important is the integration of planning documents. Master Builders supports the consolidation of planning instruments into a single combined plan per region that integrates the spatial strategy, natural environment plan and land-use plan. Having one plan per region that implements national direction and includes spatial, environmental, and land-use provisions in one place will significantly reduce the proliferation of separate plans and conflicting rules that we saw under the RMA.
- 3.5 Fewer plans mean less duplication and complexity. A combined plan also makes it easier to reconcile development and environmental considerations at the regional level. We particularly champion the introduction of mandatory Regional Spatial Strategies as part of the combined plan.
- 3.6 Spatial planning provides a long-term (30-year) vision for growth and infrastructure, ensuring development is strategically aligned with environmental limits and infrastructure investment from the outset. An example of this is a spatial plan can designate where future housing expansion should occur in conjunction with transport and water infrastructure while also identifying environmental constraints in those areas. By requiring councils within a region to collaborate on one spatial strategy and one combined plan, the Bills foster more integrated, cross-boundary decision-making. This joined-up approach is vital for efficient urban development – housing, infrastructure, and environmental protection can be planned together rather than in silos.
- 3.7 We appreciate that the new system strikes a balance between national standardisation and local flexibility. Councils will be empowered (and in many cases expected) to use nationally provided zone definitions, overlays, and rule templates when developing their combined plans. Using these standard templates and rules will streamline plan-making and eliminate the need to reinvent core provisions in every district. At the same time, councils can propose bespoke provisions for unique local circumstances but only if justified by evidence and subject to more rigorous scrutiny (including merits appeals on those bespoke parts). We support this approach. It appropriately encourages councils to default to the national planning toolkit for efficiency while still allowing genuinely necessary local differences. For our members, this means most baseline rules (such as zone definitions, building height limits in standard zones, etc.) should become consistent nationwide, reducing confusion and compliance costs. Any departures from the norm will need to be well-justified and evidence-based, which gives us confidence that local anomalies will be minimised going forward.
- 3.8 We support the statutory timeframes to drive progress and ensure the benefits are realised as soon as possible. The first set of regional spatial strategies must be notified within 15 months of the NPD being issued (or within 6 months of the Bills' enactment) and finalised 6 months later. Likewise, land use and natural environment plans must be notified within 9 months after the spatial strategy is decided. Master Builders fully supports these statutory timeframes and looks forward to seeing the new system's benefits (simpler, clearer plans enabling development) realised as soon as possible.
- 3.9 We recommend that central government provide strong support to councils during the transition by focusing on timely issuance of the NPD and national standards so locals have the necessary

guidance, as well as resources like templates, training, data support, and possibly funding assistance for plan development. The Committee should seek assurances that the Ministry for the Environment and related agencies have plans in place to help regions hit these statutory milestones. The worst outcome would be avoidable delays or poorly executed plans that undermine confidence in the new system. Conversely, if done well, the national direction + one regional plan model will be a cornerstone of the reform greatly simplifying the planning landscape for builders and developers.

3.10 We are pleased to see an emphasis in the reforms on leveraging standardised data and modern technology to improve planning. The explanatory notes to the Bills highlight making better use of data and digital tools to enable faster, more consistent decisions and to monitor outcomes. Master Builders fully supports this direction. In practice this should mean developing unified digital planning systems and open data standards for resource management, so that consent information and environmental data can be easily shared and analysed across the country. For example, e-consenting platforms could streamline application processing, and better data on consent timeframes and outcomes could help identify bottlenecks to fix. Improved data will also enhance accountability – councils will need to monitor and report on the efficiency and effectiveness of their plans, and having consistent metrics will allow meaningful comparisons and incentivise performance. We encourage the Government to invest in the necessary data infrastructure and require councils to adopt standard digital tools and practices. A modern planning system must harness technology to reduce paperwork and delays, and we're glad the Bills acknowledge this aim.

3.11 Both Bills together reshape the institutional framework for resolving planning disputes and appeals. Notably, the reform channels different issues to different forums: lower-level, technical plan and consent disputes will go to a new Planning Tribunal (established under the Planning Bill) for faster resolution, whereas major matters (like plan content appeals or significant enforcement issues) will remain with the Environment Court. We support this stratified approach to dispute resolution. It ensures that straightforward cases can be resolved more cost-effectively without overburdening higher courts, while complex or high-stakes cases still receive full judicial consideration. A well-functioning dispute resolution system is essential for a smoother resource management regime – it provides a “safety valve” to correct errors or address grievances without derailing projects for years. Master Builders is optimistic that the combination of a new Tribunal for quick fixes and the refocused role of the Environment Court will lead to faster, more proportionate resolution of planning issues.

#### **4. Provisions Specific to the Planning Bill (Land Use Planning and Development)**

##### *Simplified Planning System and Consenting Process*

4.1 The Planning Bill establishes the rules and processes for land use planning and development – essentially replacing the urban planning and land use components of the RMA. Master Builders is largely supportive of the Planning Bill's provisions, which we believe will make it easier to obtain approvals for construction projects without compromising necessary oversight. We applaud the Bill's moves to simplify and streamline resource consents.

4.2 One of the most welcome changes is that the Bill narrows the range of effects that councils will regulate at the consenting stage and raises the thresholds for requiring consents. In practice,

councils will manage fewer minor or trivial effects, and consent requirements will be triggered only for more significant impacts.

- 4.3 By using a higher threshold for what needs consent – focusing on effects that are more than minor the system will significantly reduce the number of consents required overall. We strongly support this reduction in low-level consenting red tape. Too often under the RMA, worthwhile projects have been caught in costly consent processes over very minor effects or technical non-compliances. Something as small as a slight yard setback encroachment or an extra parking space could currently force a full resource consent process. Under the new regime, if an activity's effects are negligible or small, it is much more likely to be permitted outright, allowing the project to proceed without delay. This change frees up both council and applicant resources to concentrate on proposals that truly warrant scrutiny (i.e. those with meaningful environmental or community impact).
- 4.4 The Bill also collapses the RMA's complex array of activity classes into just four categories: permitted, restricted discretionary, discretionary, and prohibited. This is a welcome simplification from the previous myriad of categories (such as controlled, non-complying, etc.). Each category will come with clear information and assessment requirements, giving applicants more certainty about what is needed for a consent application.
- 4.5 We view this simplification favourably as it will be much clearer for builders and developers to determine how a given project is classified and what the consent pathway is. In short, the Planning Bill's approach is to streamline consent requirements and processes so that routine, low-risk developments can proceed faster while ensuring robust assessment of genuinely significant effects.

#### *Focused Public Participation in Consenting*

- 4.6 Another transformative change in the Planning Bill is the refocusing of public participation to the plan-making stage rather than the consenting stage. Under the new system only people who are materially affected by a specific proposal will be allowed to participate in the consent process and public notification of consents will occur only for effects that are more than minor. Routine consents for projects that comply with the plan will not be open to broad public objection or appeal. Master Builders views this as a significant improvement over the current RMA practice that even modest, compliance-aligned projects could be opened to public submissions and appeals by anyone leading to extensive delays and relitigation of issues that should have been settled in the planning stage.
- 4.7 The new system's will have community input early when plans and rules are being set rather than at the individual project stage for every consent and we fully support this change. It will make consenting faster, cheaper, and more certain for applicants, while preserving appropriate avenues for public voice at the strategic planning level.
- 4.8 We note that public notification and submissions will still occur for larger or more impactful projects, proposals with more-than-minor unmitigated effects or where not all affected parties can be identified will still undergo notification. This is appropriate and aligns with common sense – truly significant projects should and will still get community scrutiny. However, the default for typical development proposals that comply with up-front plan standards will be non-notified, limited processing. These consent process reforms should considerably improve the speed of

getting building projects off the ground, by eliminating unnecessary consent requirements and focusing effort where it matters most.

#### *Zoning Consistency and Enabling Development Capacity*

4.9 The Planning Bill sets up the framework for future land use plans that each region will prepare (as part of the combined plan). As noted previously, there is a strong emphasis on using nationally standardised zones and provisions. From a land use perspective, this means builders can finally expect a more uniform set of planning rules (zoning, development controls, definitions, etc.) across different councils. For instance, a “Residential Zone” or “Light Industrial Zone” will be defined and managed similarly in different regions, as guided by the national standards. Master Builders strongly supports this consistency. It will allow builders and developers to operate with confidence that fundamental rules won’t drastically change from one district to another, and it prevents duplicated effort in learning and complying with multiple disparate planning regimes. This consistency will also encourage competition and innovation, as builders can expand to new areas without facing entirely new sets of regulations each time.

4.10 Crucially, the Planning Bill’s goals include enabling economic growth and well-functioning urban areas by ensuring sufficient land is zoned for housing and business use. Master Builders endorses these goals as it will enable competitive urban land markets and proactively plan for infrastructure are explicitly stated aims of the Bill, which aligns with our industry’s needs. We expect that the new land use plans, guided by robust spatial strategies, will zone adequate land for development and will streamline up-zoning or density increases where needed to meet demand. We cannot overstate the importance that the new plans must actively enable housing supply and accommodate growth. The legislation is providing the tools to do so (through mandatory spatial planning, development capacity assessments, etc.); it will be incumbent on plan-makers to use these tools ambitiously to address New Zealand’s housing shortage.

4.11 We will be closely watching the first round of combined regional plans to ensure they deliver enough development capacity. If implemented well, this approach should lead to urban plans that facilitate growth (with well-serviced land and realistic rules), rather than the restrictive planning of the past which often lagged behind demand.

4.12 We support the Planning Bill’s direction to create more consistent zoning nationwide and to require forward-looking provision for growth. We recommend that during the Bill’s implementation, the government monitor whether councils are indeed zoning and servicing sufficient land to meet the National Planning Framework’s requirements for development capacity. The success of the reform will in large part be judged by whether it becomes easier to build the homes, commercial buildings, and infrastructure our communities need.

#### *Planning Tribunal – Fast-Track Dispute Resolution*

4.13 We support the creation of the new Planning Tribunal and is optimistic that it will provide a faster, more cost-effective avenue to iron out certain planning disputes that would otherwise slow down projects.

4.14 Under the RMA system, if a builder objected to a condition on their resource consent or a council’s refusal to process a consent non-notified, the only recourse was often to lodge an appeal to the Environment Court or seek judicial review – processes that are time-consuming and costly. In contrast, under the new system, the Planning Tribunal can promptly review and confirm,

modify, or quash the council's decision, or send it back to the council for reconsideration. The Tribunal is designed to operate with streamlined processes without the need for a formal, lengthy hearing. This agility is very welcome as it means small disputes won't derail a project for months or years on end.

- 4.15 It will be important that the Planning Tribunal is properly resourced and given appropriate powers to fulfil its mandate. Master Builders recommends ensuring the Tribunal has enough qualified members (with planning and legal expertise) to handle cases promptly and that its processes remain as non-bureaucratic as intended. We also note that the Tribunal's decisions will still be subject to appeal to the Environment Court on points of law, which we find reasonable for accountability.

#### *Regulatory Relief for Affected Landowners*

- 4.16 Master Builders supports the principle of the Regulatory Relief framework. It effectively recognises that protecting public or environmental values often comes at a cost to individual property owners and it seeks to share that cost more fairly. The Planning Bill equips councils with a toolbox of possible relief measures including (but not limited to) rates relief, waivers of consent fees, transferable development rights or bonus development potential elsewhere on the property, land swaps, grants, or even direct financial compensation.
- 4.17 We support the requirement for councils to justify protections based on environmental or historic purposes on a property-specific basis with data and evidence and consideration of measures to mitigate the burden on the owner impacted.
- 4.18 We recommend that clear national guidance be developed on how to assess what counts as a significant impact on land use and how to quantify appropriate relief options.

## **5. Aligning Environmental Protection with Development Needs**

- 5.1 Master Builders supports strong environmental protection but stresses it must be aligned with development planning rather than operating in isolation. The Natural Environment Bill and Planning Bill need to work together in practice and not just in design.
- 5.2 We support the integrated system architecture linking spatial plans, natural environment plans, and land use plans and the importance of carrying this integration through into implementation.
- 5.3 Spatial planning should be used to make early, strategic decisions about where growth is appropriate and where environmental protection must take priority. This will reduce conflicts and provide greater certainty than resolving issues on a project-by-project basis.
- 5.4 With effective spatial planning, integrated regional plans, and balanced implementation, New Zealand can achieve both environmental protection and the timely delivery of homes and infrastructure.

## **6. Conclusion**

- 6.1 We strongly support the Planning Bill and Natural Environment Bill proceeding as they promise a much improved framework for building the homes and infrastructure New Zealand needs. We believe that with the recommendations outlined in this submission emphasising consistency,

practicality and balance will result in the Bills leading to a more efficient, predictable and fair system.

6.2 We thank you for the opportunity to make this submission.

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