

Planning Weight – Claims of Regional and National Significance

Abstract — This Planning Weight document considers whether fast-track applicants use claims of regional or national significance to justify non-shovel-ready, greenfield, large-scale residential developments. Building on an earlier presentation, it compares projects that claim significance while bypassing ordinary growth sequencing, infrastructure funding, hazard assessment, and local planning controls. It examines Auckland and national examples involving housing yield, rural land conversion, flood and stormwater risk, infrastructure readiness, highly productive land, private incentive arrangements, and claimed economic benefits. It argues that significance may affect planning weight, but should not determine approval without strong strategic need, servicing certainty, hazard resilience, productive-land and waterway protections, and enforceable public outcomes.

- **The evidential burden should increase where a proposal is non-shovel ready.** If servicing, funding, stormwater, wastewater, roads, or staging remain unresolved, the project should receive reduced planning weight despite its claimed scale.
- **Conditions should not defer core feasibility questions.** Approval should not rely on future conditions to resolve matters that determine whether the development is appropriate at all in the first instance.
- **Out-of-sequence greenfield proposals should face a higher threshold.** If approval would bypass ordinary plan changes, council sequencing, or Future Development Strategy (FDS) assumptions, the panel should require strong justification and retain authority to decline rather than grant consent subject to caveats of future infrastructure build forcing councils to change their FDS plans for the development.

1. Contribution to National Housing Objectives -

Housing numbers alone do not establish regional or national significance. Their weight depends on market scale, growth pressure, infrastructure capacity, hazard exposure, and alignment with local government strategic planning.

- ⇒ Auckland presents the strongest case because housing supply can affect affordability, labour mobility, productivity, and national economic performance, especially where growth uses existing infrastructure and networks. Even so, significance should not be determinative across all Auckland locations.
- ⇒ Devonport demonstrates that Auckland-wide housing significance must be assessed under local planning controls, including those protecting town-centre form, coastal setting, heritage character, and established residential character. Broad significance claims should not override these place-specific protections.
- ⇒ Queenstown–Arrowtown is distinct because housing significance relates to the shortages in housing and worker accommodation affect tourism capacity, labour retention, business costs, and visitor-sector pricing.

- ⇒ Wellington focuses the inquiry on resilience, infrastructure constraints, seismic risk, and the functioning of central government and major employment centres.
- ⇒ Christchurch is the counterpoint. The substantial greenfield capacity and its post-earthquake growth context, yield alone is less persuasive unless a proposal is sequenced, serviced, and aligned with metropolitan planning.

Overall, housing yield carries weight only where development is well located, serviced, resilient, affordable, and aligned with growth strategies and local controls. The relevant factors vary by place: planned growth and confirmed infrastructure in north-west Auckland; tourism-economy effects in Queenstown–Arrowtown; and housing, resilience, or sequencing benefits in Wellington and Christchurch. Poor location, premature growth, unresolved servicing, hazard exposure, or productive-land and local-control conflicts should reduce the weight given to dwelling numbers.

2. Alignment with National Direction on Hazards, Climate, and Resilience

The same caution applies to climate adaptation, natural hazards, and long-term resilience. Leap-frogged housing developments should not rely on regional or national significance unless they first demonstrate catchment-scale flood attenuation, resilient water infrastructure, nature-based stormwater management, and no increased downstream risk under future climate scenarios. Otherwise, approval would set a precedent for large-scale development in constrained locations.

For Waimauku West, this comparator is directly relevant because the HHL Holdings proposal would introduce substantial urban development onto rural land ahead of confirmed sequencing and public infrastructure. Its significance claim should not rely on dwelling yield alone. Approval should require proof of catchment-scale flood and stormwater management, resilient water and wastewater servicing, and no increased downstream risk; otherwise, fast-track consent could set a precedent for private, out-of-sequence urbanisation in a hazard-sensitive rural location.

3. Highly Productive Land and Food-Security Considerations

The loss of highly productive land is nationally significant because productive soils are scarce, strategically important, and difficult to replace. Urban development on such lands can conflict with national interests in food production, rural economic resilience, and efficient long-term land use, particularly where development proposals are located outside an established or sequenced growth boundary.

Comparative Review of Non-Shovel-Ready Rural Land Housing Developments

North Island comparators

Comparator	Rural/productive land and sequencing issue	Infrastructure or utility capacity issue	Mana whenua / PSGE incentive issue	Planning lesson for Waimauku West
Sunfield, Ardmore/Papakura, Auckland	Large rural/peri-urban greenfield community conflicting with growth sequencing and strategic planning, with site-specific NPS-HPL soil assessments noting heavy clay soils and drainage constraints.	Concerns reported about floodplain location, transport, stormwater, water, wastewater, power, communications, and reliance on extensive future conditions.	Benefit arrangements should be separated from the independent cultural assessment of freshwater and environmental effects.	Approval with conditions does not prove shovel-readiness; unresolved hazards and infrastructure require strict staging and funding controls.
Delmore, Orewa, Auckland	Large edge-of-urban subdivision on 109ha raising growth-sequencing and integration issues. Council and Watercare opposed with the stated restrictions.	Roads, three-waters, schools, reserves, and community facilities must be delivered before occupation at scale.	Generic engagements to avoid wider cultural effect scrutiny.	Housing yield should NOT mask infrastructure dependency (cannot physically connect until at least 2050) & premature rural land conversion.
Milldale later stages, Silverdale/Wainui, Auckland	Further metropolitan-edge expansion involving conversion of formerly rural land.	Relies on staged civil works and network capacity for roads, stormwater, water, and wastewater.	As above	Later stages remain non-shovel-ready if networks or funding are unresolved.
Riverhead / Rangitōpuni	Rural-edge growth where productive, ecological, and catchment values compete with housing claims.	Local roads, wastewater, stormwater, public transport, and community infrastructure are absent.	Te Kawerau a Maki combining hapu iwi PSGE asset-holding with Avant Property Dev.	Test whether private development would force public infrastructure sequencing.
Te Waimanawa, Warkworth South / Mahurangi	While not using the FTAA pathway, the nearby private plan changes for 1600 new homes south of Warkworth.	Wastewater, stormwater and any public transport. Mahurangi River already has its issues.	KA Waimanawa Sub-Group Limited in partnership	Has a strict legal caveat that the actual subdivision building cannot proceed until Watercare could do it.

South Island comparators

Comparator	Rural/productive land and sequencing issue	Infrastructure or utility capacity issue	Mana whenua / PSGE incentive issue	Planning lesson for Waimauku West
Maitahi Village, Nelson	Urban-edge housing in a sensitive catchment, balancing housing, landscape, freshwater, and rural-edge values.	Requires clear stormwater, transport, erosion, freshwater, and servicing evidence.	Arrangement should be assessed through cultural effects, freshwater values, and enforceable outcomes.	Significance does not justify deferring catchment or infrastructure effects.
Bellgrove, Rangiora, Canterbury	Greenfield township-edge subdivision converting rural land.	Requires integrated roading, stormwater, wastewater, reserves, schools, and public transport planning.	Where cultural mitigation is proposed, the record should show who was engaged and whether any outcomes are secured by conditions.	Contiguous growth still requires proven servicing and sequencing.
Rolleston and Selwyn greenfield growth areas, Canterbury	Peri-urban pressure progressively converting fertile rural land to housing and roads.	Growth depends on funded transport, three-waters, schools, and community facilities.	Incentives to Māori entities should not be used to avoid wider land and water assessments & intergenerational effects.	The cumulative loss of productive land is a strategic effect, not merely a site-specific subdivision issue.
Arrowtown (Ridgeburn Ltd) Proposal	Between Lake Hayes and the Kawarua River (60km length) near opposite Arrowtown. Lands contain Class 3 soils as per the NPS-HPL protective legislation.	The 212ha Morven Ferry Road location is 6km outside the QLDC agreed urban growth boundaries with no council infrastructure networks.	An explicit 45+ for mana whenua and social rental housing allocations for low income as part of its development pitch	Test whether private development would force public infrastructure sequencing. <i>(application on hold)</i>

Homestead Bay, Queenstown-Lakes	Fast-track urban-edge housing and commercial development in a high-growth district, relying on housing demand and economic benefits to justify substantial settlement expansion.	Fast-track material noted independent wastewater systems designed for future council-network integration, making servicing certainty central to readiness.	If applicant-led benefits or partnership arrangements are relied on to reduce objection risk,	A fast-track approval based on housing need and independent servicing does not remove the need to prove catchment-scale stormwater performance, wastewater reliability, funding, staging, and independent cultural-effects assessment.
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Additional planning implications

Applicant incentives, support, or benefit arrangements with mana whenua or PSGEs should be transparent, voluntary, inclusive of affected interests, and enforceable. They must remain *separate* from the independent assessment of freshwater, environmental, Treaty, and cultural effects, and should not replace wider cultural-effects scrutiny. The expert panel should assess the offer's mandate, affected-interest coverage, Treaty or customary-rights implications, and whether promised outcomes—such as restoration, employment, infrastructure access, monitoring, or partnership—are secured by conditions.

For Waimauku West, the return of Maunga Tauwhare may be a worthwhile offer, but it should not depend on fast-track approval or substitute for independent assessment of a genuine partnership from arrangements that may pressure support. Any PSGE, marae, or memorandum-of-understanding arrangement should be tested against whether cultural, environmental, freshwater, wāhi tapu, mahinga kai, landscape, and intergenerational effects are properly addressed, particularly given the whenua's layered history of early Māori occupation, cultivation terraces, occupation and seasonal pā, kauri extraction for the great ceremonial waka *Taheretikitiki*, colonial timber use, and high productive soils for pastoral farming.

Flood Risk and Out-of-Sequence Growth Comparators

	Waimauku West	Comparable Fast-track Floodplain / Out-of-Sequence Issues	Council Planning Implication
Claimed significance	Large housing yield with local centre, employment, schools, and infrastructure claims.	Comparable proposals rely on housing numbers, jobs, economic output, and community facilities to claim wider benefits.	Scale is relevant, but cannot override unresolved hazards, infrastructure gaps, or policy conflicts.
Floodplain context	Flood-prone catchment, downstream-effects, and stormwater-certainty concerns.	Sunfield was reported as a major fast-track housing proposal on flood-prone land, with council and infrastructure-agency concerns.	Require catchment modelling, climate allowances, no-worsening outcomes, and enforceable stormwater conditions.
Infrastructure readiness	Water, wastewater, and stormwater depend on private or new infrastructure pathways.	Comparable proposals raise wastewater, water, transport, and enabling-infrastructure timing issues.	Do not rely on conceptual servicing; require funded, consented, operational infrastructure before occupation.
Rural Urban Boundary and growth sequencing	Appears outside Auckland's urban boundary and planned growth sequencing.	Out-of-sequence approval can create precedent pressure beyond planned infrastructure areas.	Distinguish housing need from strategically appropriate urban location.
Future Development Strategy (FDS) alignment	Difficult to reconcile with compact growth unless infrastructure efficiency and strategic necessity are proven.	Auckland FDS monitoring shows most new dwellings are consented within existing urban areas.	FDS-inconsistent projects should face a higher threshold by Council before being accepted as regionally or nationally beneficial.
Precedent risk	Approval could normalise private infrastructure-led expansion into rural, hazard-constrained areas.	Flood-risk fast-track approvals may encourage applications that bypass ordinary plan sequencing.	Seek strong reasons, conditions, and safeguards to protect integrated regional planning.

Conclusion

The comparators show a clear pattern: fast-track applicants increasingly use broad regional or national significance claims to support large housing proposals outside ordinary sequencing, infrastructure planning, and environmental-constraint analysis. Housing need, economic activity, employment, community facilities, and partnership benefits may be relevant, but they must still be weighed against local impacts, since local communities carry the consequences of unplanned growth.

Across the comparators, the same risk emerges. Regional or national significance can be over-stretched. The key distinction is between housing that advances planned, serviced, resilient urban growth and housing that simply expands the urban footprint because land is available. Where water, wastewater, stormwater, transport, flood management, productive-land protection, food security, or cultural effects remain unresolved, significance should be reduced—not elevated. It should not become a shortcut around growth sequencing, infrastructure funding, hazard management, highly productive land protection, or local democratic planning.

Inappropriate fast-track approval can create a *slow reckoning with long-term consequences*, leaving residents, ratepayers, and councils to carry risks to insurance, travel times, infrastructure performance, and asset values if developer aspirations, conditions, or partnership promises are not delivered.

For Waimauku West, the HHL Holdings application should not be accepted as regionally or nationally significant simply because it promises housing and economic benefits. It must first prove strategic necessity, infrastructure sequencing, flood resilience, protection of productive rural land, consistency with PC120 and Auckland's growth framework, and effective management of downstream, cultural, environmental, and intergenerational effects. On the comparator evidence, it remains a precedent-setting proposal with unresolved risks rather than a self-evidently beneficial regional or national project. If those matters remain unresolved, approval will stretch regional and national significance beyond its proper planning purpose.

He waka eke noa

A canoe which we are all in with no exception

Reference given to the document in my 22 July 2026 presentation - Compiled and written by Jane Sherard for Waimauku Community Association members and others.