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25 July 2025

Ministry for the Environment and
Ministry of Housing and Urban Development

Email: gfhg@hud.govt.nz

Dear Sir/Madam

Waikato Regional Council Submission on the National Direction Package 4 – Going for Housing Growth discussion document

Thank you for the opportunity to submit on the National Direction Package 4 – Going for Housing Growth discussion document. Please find attached the Waikato Regional Council's (the council's) submission regarding these documents. The submission was formally endorsed by the council on 23 July 2025.

Council recognises the importance of Waikato as a significant region for the country in terms of food production, the location of key national infrastructure, being a critical Upper North Island freight movement node, a centre for national energy generation, a significant area of high metro-growth, and a region rich in diverse natural environments that support many tourism activities. The Waikato also has unique Treaty settlements that need careful consideration in regard to their continued application in the Waikato.

The attached submissions are comprehensive with a wide range of topics covered, elected members held a wide range of views on each of the submissions made. Council's submission points on Te Mana o te Wai were well debated by council, and given the nature of the topic we want to highlight that there is a diversity of perspectives held by elected members. As a collective, however, Council was supportive of the submissions being lodged, emphasizing that a balance needs to be struck between environmental stewardship and a productive and prosperous region.

Should you have any queries regarding the content of this document please contact Miffy Foley, Team Leader, Strategic and Spatial Planning directly on (07) 8590516 or by email Miffy.Foley@waikatoregion.govt.nz.

Regards,

Tracey May
Director Science, Policy and Information

Submission from Waikato Regional Council on the National Direction Package 4 – Going for Housing Growth discussion document

Introduction

1. We appreciate the opportunity to make a submission on the National Direction Package 4 – Going for Housing Growth discussion document.

2. Waikato Regional Council (the council) recognises the importance of enabling good housing and urban development outcomes. The council is a member of the urban growth partnership Future Proof[1] which collaboratively manages growth for the high-growth subregion of Hamilton city, and Waipā, Waikato and Matamata-Piako districts. Much of this submission reflects the council's experience of being an active participant of this partnership.

3. The Future Proof partnership completed its future development strategy (FDS) in 2024 which identifies that:
    a. The Future Proof subregion already has sufficient plan-enabled capacity for housing, and
    b. Infrastructure, and funding and financing infrastructure to cater for growth, is one of the biggest issues.

4. We provide a summary of our key recommendations below. The remainder of the submission follows the structure of the discussion documents, providing answers to the consultation questions.

5. We look forward to future consultation processes on the new resource management system and proposed changes to national direction and would welcome the opportunity to comment on any issues explored during their development.

Submitter details

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[1] Home | Future Proof

Summary of key points

6. Waikato Regional Council (the council) supports the intent of the National Direction Package 4 to improve housing and urban development outcomes. Drawing on our experience through the Future Proof partnership, the council emphasises the importance of integrated land use and infrastructure planning and local context in shaping effective housing policy.

7. We provide a summary of the key themes covered in our submission below.

8. Balanced urban development:
   - Equal emphasis should be placed on well-functioning urban environments and sufficient development capacity.
   - Urban development should enable people to provide for their social, economic and cultural wellbeing.
   - We support a streamlined approach for the release of land, however this is contingent on there being a rigorous process in place when land is identified for urban development or greater intensity of development to ensure that the land is suitable.

9. Infrastructure and integration:
   - Infrastructure planning must be integrated with land use, considering a range of infrastructure including public transport, three waters, and additional infrastructure.
   - We caution against "opening up everything, everywhere, all at once" due to risks of undermining strategic infrastructure investment.

10. Spatial planning:
    - We support regional spatial plans having regulatory weight in the new resource management system.
    - Spatial plans should identify where development should occur but equally where it shouldn't, the infrastructure required to support it, and what is needed to build resilience to natural hazards, amongst other matters.
    - We support e-plans and dynamic updates to ensure better alignment with infrastructure planning.

11. Housing growth targets:
    - We support growth targets but note that feasibility and infrastructure are often bigger constraints than zoning.
    - We recommend mechanisms to ensure timely delivery of housing and discourage land banking.
    - We suggest using preferred growth scenarios over complex modelling and growth targets.

12. Feasible and realistic:
    - Feasibility should reflect changing market conditions, infrastructure constraints, and local development dynamics.
    - We are ambivalent about replacing "reasonably expected to be realised" with "realistic", but either definition requires clear guidance as to how it should be assessed.

13. Business land and mixed use:
    - We do not consider a blanket 30-year requirement for business land capacity is necessary.
    - We support standardised zones for industrial and commercial land to protect these areas from inappropriate development.

14. Responsiveness and growth funding:
    - We support mechanisms for out-of-sequence development, but only if they meet criteria, including being consistent with the regional spatial plan, and don't undermine planned infrastructure.

- We emphasise the importance of “growth paying for growth” through infrastructure levies and developer agreements. Councils, and ultimately ratepayers, should not be subsidising unanticipated urban development.

15. Urban limits and leapfrogging:
    - We oppose removing urban-rural boundaries and prohibiting leapfrogging controls, as this risks creating urban sprawl, infrastructure inefficiency, potential for stranded infrastructure, and reduced public transport viability.

16. Public transport and intensification:
    - We support creating new corridor categories for intensification along key public transport corridors, so that they apply outside of Auckland and Wellington.
    - We agree councils should determine corridor classifications and support aligning with the NZ Transport Agency’s One Network Framework.

17. Māori outcomes:
    - We see opportunities for Māori in the new system through more enabling provisions for housing and mixed-use development.
    - We emphasise the need for practical support, tailored mechanisms, and ongoing engagement to ensure equitable outcomes.

18. Additional feedback:
    - We support mechanisms for genuinely affordable housing.
    - We recommend addressing private covenants that hinder efficient land development.
    - We suggest not requiring a review of Future Development Strategies (FDS) before 2027 given the imminent resource management reform, including the requirement to prepare regional spatial plans.

Questions	Comments
1. What does the new resource management system need to do to enable good housing and urban development outcomes?	**Equal focus on well-functioning urban environments** The new system should put equal focus on well-functioning urban environments and sufficient development capacity. In the council's experience, the focus has more been on the sufficient development capacity. The system should also have an emphasis on how a new development provides or contributes to a well-functioning urban environment in a wider context than just the development site itself, such as access to services external to the development and not just within the development, and address how extra demand on these services is to be funded **Consideration of Infrastructure** The system needs to consider the breadth of infrastructure required to deliver and support good housing and urban development, including social and community services as well as transport and three waters infrastructure, and a range of housing sizes and types. Well-functioning and quality urban environments are not just about providing development capacity – they must do so in a way that enables people to provide for their social, economic and cultural wellbeing. The use of a mechanism for timely release of land for urban development has to be considered properly in the context of infrastructure staging, current capacity of existing networks and who pays for what. Opening up everything, everywhere, all at once is challenging. It dilutes existing council infrastructure investment and strategic planning for community and transport plans. Integrating land use and infrastructure planning is important for ensuring that infrastructure (particularly three waters and roading) is ready when it is needed to be used and that it has sufficient capacity across its design life so that effects on the environment are appropriately managed. Integrated infrastructure and land use planning are easily undermined if the sole focus is on development capacity. **Integration of land use and transport** The new system needs to integrate land use and transport planning, as transport is critical to supporting and shaping urban development and housing growth. It should take into consideration the interrelationships between long-term strategic and spatial planning that occurs under the Land Transport Management Act 2003 (LTMA) through the development of Regional Land Transport Plans, spatial planning under a new resource management system, and allocation of funding and infrastructure through long term plans and infrastructure plans under the Local Government Act 2002. Transport infrastructure planning and prioritisation, maintenance and operation, and funding occurs across this legal and regulatory landscape and has a direct impact on providing for urban development and supporting housing growth. Urban form and transport are closely interrelated. Compact urban form supports public transport and mode shift, contributing to national and regional objectives relating to carbon emissions reduction. Public transport is vital physical and social

Questions	Comments
	infrastructure that is needed to support and facilitate well-connected liveable urban communities and is integral to ensuring social and economic cohesion. Transport, and public transport in particular, is key in helping to unlock housing growth. **Acknowledge that there are hard limits to growth** Councils should have the ability to restrict development that is in an inappropriate or unsafe place, such on flood plains and other land affected by natural hazards, or in areas that would compromise already planned growth. The current litigious system effectively means that councils most often at times must accept private plan changes in unsuitable locations, and it is very expensive and resource intensive. Ensuring our communities are resilient is a key part of providing for well-functioning urban environments. The proposed National Policy Statement for Natural Hazards is a positive step towards applying a consistent approach to identifying and managing, or avoiding, natural hazard risks. It is critical that the new resource management system provides for natural hazard risks to be identified early in the planning process (during spatial planning and rezoning processes) to ensure that areas of unacceptable risk are avoided and future urban development is resilient to natural hazards and climate change. The system also needs to recognise that there are some hard limits to growth. For example, our freshwater resource is finite, and in some locations close to, or over, allocation limits. There are also a range of different values and priorities that need to be balanced in planning for urban growth, including protection of natural environmental values and habitats of indigenous species, water quality and high-class soils and the primary production activities they support. The new system needs to provide clear direction on these matters of importance to be provided for in resource management processes, that enables local authorities to appropriately balance these with urban growth and development in way that reflects their local context and issues of value to local communities. **Use of standardisation** The council **supports** the use of national standards and standardised zones to reduce the complexity of the current large range of plan provisions across the country which are often the subject of lengthy appeals. We also support there being a process to be able to justify a variation to these standards where there is a local need to do so.
2. How should spatial planning requirements be designed to promote good housing and urban outcomes in the new resource management system?	**Regulatory weight** The council **supports** elevating the use of spatial plans in the new system which will require the necessary regulatory weight so that they are not ignored or overridden in the plan hierarchy proposed in the new system or in consenting decisions under it. We support each region being required to have a spatial plan with flexibility for local authorities to focus on specific parts of the region, say for priority development areas which will have specific infrastructure requirements.

Questions	Comments
	Infrastructure The council **supports** retaining the current requirement in the National Policy Statement on Urban Development (NPS-UD) to identify critical infrastructure to support growth into the new spatial planning requirements. This should continue to be linked to long term plans (LTPs) so that there is funding alignment between them, and recognise that councils' finite ability to fund infrastructure will influence the delivery of critical and other infrastructure. It should also link to the forward planning by the new water council-controlled organisations (CCOs) that are currently being put in place, and other utility providers. **Integration of transport and land use** Spatial plans must show Integration of transport and land use to support multi model transport options. This needs to be at all spatial scales – nationally, regionally and locally – so that they all integrate. The council **supports** identifying infrastructure prerequisites to make it clear what is needed before development can go ahead, and ideally over what timeframe and how the funding components are managed. **Resilience** The climate is changing, and so are the risks regions may face as a result, with the frequency, severity and impact of natural hazards increasing. These climate and natural hazard risks have serious implications for people and assets and highlight the need for continued investment in protective infrastructure, such as for flood management and drainage. Spatial planning should ensure that community impacts from natural hazards are minimised through identifying areas that are unsuitable for growth and that infrastructure is designed and located appropriately. **Provide opportunities for Māori** Spatial planning should provide opportunities to improve Māori access to affordable housing through easing planning barriers to help iwi and Māori trusts develop papakāinga and kaumātua housing. It also has a role to play in protecting wāhi tapu, cultural landscapes, and customary rights. **Retain a 30 year time horizon** The council supports spatial planning of <u>at least</u> a 30-year time horizon provided that councils have the ability to determine where a longer time period is applied. A longer timeframe would be supported for identifying future infrastructure corridors and in recognising the long life of infrastructure assets, and may also be useful for climate change projections and potential managed retreat.

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	However, we disagree that under a 30-year time horizon, spatial plans would have little or no role to play as development capacity will be 'plan enabled'. Spatial plans should be doing more than just identifying areas for growth (as outlined in the response to this question). There is also a big difference between plan-enabled capacity (which may include land banked by landowners) and feasibility and delivery. Feasibility will change considerably within the 30-year time horizon. **Limit the application of fast track** Once regional spatial plans are in place, the Fast track Approvals Act 2024 (FTAA) should be rescoped to focus on the delivery of on infrastructure projects, or at least remove the ability for urban developments to be applied for where they are contrary to the regional spatial plan. Allowing fast-track applications that are contrary to the regional spatial plan would significantly undermine the work and investment of local authorities, other agencies, iwi and communities in developing the agreed long-term spatial vision for the region. **Use of e-plan** The council **supports** having a nationwide e-plan system. One of the challenges with FDSs is that they cannot keep pace with the change resulting from fast-track proposals, private plan changes, district plan reviews and LTPs. If spatial plans are to replace FDSs, they need to be non-static documents (or supported by non-static documents such as the implementation plans) that through e-plans can be more readily updated to reflect changing inputs from infrastructure providers. **Implementation plans** Implementation plans should show how infrastructure levies or target rates will be assigned to pay for delivery, and these should align with council LTPs. **Priority Development Areas** The use of priority development areas is already well established in the Future Proof Partnership. These are areas, often with cross territorial authority boundary implications, that are mutually agreed, prioritised and progressed for the good of the urban growth partnership. Regular tracking[2] of these areas shows how the partnership overcoming significant barriers, and how immediate or priority initiatives are enabling the Future Proof Strategy to be delivered. In the new system, they should be used to prioritise development areas on the basis that they represent the best opportunity to maximise integrated land use and infrastructure and should not be diluted or undermined by out-of-sequence proposals seeking to accelerate plan enabled capacity above everything else.

[2] Latest tracking update of the Future Proof PDAs were included in the June 2025 Future Proof Implementation Committee agenda at page 39 - Agenda of Future Proof Implementation Committee Meeting - Thursday, 5 June 2025 - Core Share

Questions	Comments
3. Do you support the proposed high-level design of the housing growth targets? Why or why not?	The council considers that growth targets are a useful tool, however, requiring them to be based on "realistic and feasible" is problematic as this assessment requires consideration of factors outside of councils' control, such the state of the market. Councils can enable zoned land and can provide infrastructure but cannot influence the market. The experience from Future Proof is that infrastructure and feasibility are often the limitations rather than zoning. For example, the 2023 Housing Capacity Assessment[3] for Hamilton City showed that over the long term (30 years) that there was plan-enabled (zoned) capacity well in excess of demand, but that when infrastructure constraints were applied, it more than halved the capacity available. It reduced even further when a feasibility factor was applied. If there is a more streamlined approach to live-zoning land, then it should not be necessary to have the full 30-year supply live-zoned. Having a process to make the land "live" would allow for infrastructure needs to be assessed and planned. Out-of-sequence developments should have a requirement to ensure genuine delivery, otherwise allowing queue jumping of planned infrastructure staging and delivery in the short-medium term is inefficient. Infrastructure cannot be provided all at once for planned growth cells, nor can it be provided on all fronts just to respond to unanticipated proposals to justify housing growth targets. Central government should also consider the concept of 'deliverability' used overseas[4] - using mechanisms to ensure that the developer or landowner has a genuine intent to develop the land rather than just benefiting from the value uplift resulting from the live zoning and/or land-banking. This could be done via a legal agreement to put in place triggers for land release, or via time limits in consents for commencement. The government could consider having a mechanism for developers to fund infrastructure that provides a wider benefit to development beyond their own site and then be able to recoup the cost e.g. provision of a roundabout that would allow for their site and as well as wider area to be developed.
4. How can the new resource management system better enable a streamlined release	The council **agrees** that a streamlined approach for releasing land would be useful. However, this position is contingent on there being a rigorous process in place when land is identified for urban development or greater intensity of development to ensure that the land is suitable.

[3] waikatorc.sharepoint.com/:b:/s/FutureProofAdministration/EUvXT5gPQ0hCh_srmG-55wYBQgUj33egXcpHFFkfm3_Oeg

[4] For example the Victorian Vacant Residential Land Tax draws levies extra taxes on property that has been vacant for more than six months in a year.
"This tax progressively increases the longer a property is vacant. Vacant residential land tax | State Revenue Office

Questions	Comments
of land previously identified as suitable for urban development or a greater intensity of development?	Land uses should be restricted on land prior to comprehensive development to those that do not compromise the ability of the land to be developed efficiently. Land in a deferred state should count towards a housing target, particularly if there is a streamlined process to enable the deferred state to be lifted. Criteria for release through a streamlined process should be subject to infrastructure triggers and alignment with an agreed structure plan, the regional spatial plan, and a funding/implementation plan. The council would need to identify the suite of infrastructure items needed to support the land release, how they are integrated with existing networks, who pays and how they are to be paid through which mechanism. This process can take time, so how the constraints are lifted or communicated to plan users could be through the use of a spatial mapped traffic light system. This traffic light system could be standardised nationally, so everyone knows if something is 'green' for example, that listed infrastructure constraints have been overcome. The proposed combined plan could provide for deferral to be lifted once a structure plan and infrastructure plan are adopted and notified by the relevant local authority. The process for preparing these plans could be modelled off the Local Government Act 2002 special consultative process. A similar process has been used in New South Wales, Australia. See **Appendix 1** which provides an example of a current plan provision that restricts the development of zoned land until certain criteria have been met. The council considers that brownfield sites should be treated differently depending on their context. If it is intended that there be a comprehensive development over the area, then the same process should be followed as for greenfield development, but if development is intended to be incremental as sites are acquired and are ready for development, then there is no need for deferral (unless there is a case for a neighbourhood development plan or similar, or if there is a level of development at which infrastructure upgrades are required). Brownfield sites could have threshold triggers to prioritise release, for example: is the site over 50 units and would the size of the development help pay for or trigger delivery of other community assets.
5. Do you agree with the proposed methodology for how housing growth targets are calculated and applied across councils?	The council **agrees** that there should be a consistent methodology for calculating housing growth targets **but considers that** the proposed approach may be too simplistic as it doesn't account for local characteristics. It is a common approach to aggregate the relevant urban SA2 areas to give a total household projection for a council's urban environment and then convert this to demand for dwellings. A demand model then usually converts the household growth

Questions	Comments
	projections within each spatial area to dwelling demand. Many of these areas contain both core urban zoned (current and future) areas, as well as large tracts of non-urban land. There are often local nuances on how urban demand is allocated based on GIS analysis, planning constraints and planning provisions which may allow for greater intensification in some areas over others. The proposed approach will not be able to factor in this local nuance. Future Proof and the council currently use projections prepared by Te Ngira Institute for Population Research (formally NIDEA). These projections are informed by the Waikato Integrated Scenario Explorer (WISE) tool to provide local context to the projections through a range of models for land use, economics, and the environment. It would be helpful if the government stipulated what infrastructure thresholds would need to be in place for the modelling to count towards housing growth targets so there is consistency across councils. At present there is a lot of variance in how individual councils determine if infrastructure is available or not and what level of infrastructure is needed to support a certain number of dwellings. The council does not consider that a 20 percent contingency margin past 10-15 years is necessary. Projection accuracy generally decreases as the period from the base (starting point) increases. For example, relative errors tend to be higher after 10 years than after five years, and higher again after 15 years than after 10 years.[5] Projections of deaths are more accurate than projections of births, while (net) migration is the most difficult component to either project or for assumption formulation. Therefore, it would be better to use a smaller margin (as does the NPS-UD) and review it based on a regular update cycle. This allows for a better understanding of how migration is trending given it is the measure that fluctuates the most and is the most sensitive to national and international policy settings.
6. Are there other methods that might be more appropriate for determining housing growth targets?	The council considers that a better option may be identifying and implementing preferred growth scenarios. Modelling is inherently imprecise and relies on having quality data and the correct assumptions underpinning the model. Rather than pursuing complicated and invariably inaccurate projections as is currently used for the housing capacity assessment approach, one option is to use household projection and immigration trends to pursue preferred growth scenarios. The Hamilton-Waikato Metropolitan Spatial Plan[6] (MSP) used a sub-regional growth scenario where the population of the metropolitan area was expected to double to 500,000 over the next 100 years. Whilst this was not a growth target and there is inevitable uncertainty as to when, how and at what rate the metro area could reach this population figure, the MSP provided for

[5] https://www.stats.govt.nz/methods/how-accurate-are-population-estimates-and-projections
[6] Hamilton-Waikato Metro Spatial Plan | Future Proof

Questions	Comments
	an accepted urban structure that could accommodate this population size. It is also supported by a transport programme business case which sets out how to incrementally increase multi modal transport options across the subregion to accommodate this overall level of growth. The council considers that the time and effort required to prepare complicated three yearly housing capacity modelling could be better put towards pursuing an outcome-focused growth scenario that provides for well-functioning urban environments.
7. How should feasibility be defined in the new system?	The council considers that feasibility should be defined as that share of plan enabled capacity that would represent potentially feasible development options for commercial developers to construct a dwelling(s) in the time period specified for housing targets based on known inputs and an accepted yield 'range', not just 20 percent. Many developers will determine feasibility across their wider portfolios and this will be based on their bank lending requirements. Feasibility is wider than just profitability. A multi-criteria assessment may be useful to consider a wider range of factors, such as hazards, site contamination, etc, which may impact feasibility.
8. If the design of feasibility is based on profitability, should feasibility modelling be able to allow for changing costs or prices or both?	The council **supports** feasibility modelling allowing for changing costs and prices. As seen during and post the Covid-19 pandemic, costs and prices are sensitive to unforeseen events and feasibility should be able to reflect that costs (labour, materials) and prices gradually change through time as demand grows (as a function of population growth). Development opportunities correspondingly change as demand increases for dwellings and different development types. Developers will make an informed decision at the time on whether the 'risk' is feasible to develop based on market dynamics. In the Waikato, the development feasibility of many sites within the region is heavily constrained by the emergence of infrastructure constraints that had not previously been considered in past housing and business development capacity assessments (HBAs), as information was not available based on 'current' textbook costs and assumed revenues. Equally, costs of finance, land costs, material costs, construction costs, labour, infrastructure etc all change over time, so it is unrealistic to base housing feasibility modelling on current costs and revenues. It is also worth noting that feasibility in an urban environment is not static, as land use changes over time, and the agglomeration of activity, including new shops, restaurants, community assets and schools, add to the desirability, demand and feasibility of an area. Decision making and changes outside of an area or even outside a region also can impact feasibility of an urban environment. For example, the increasing land prices in Auckland in the 2000s saw an acceleration of industrial and housing growth in Pōkeno at a rate well above what was predicted. Similarly, improved road access to western Bay of Plenty could result in growth pressure in the eastern part of the Waikato region.

Questions	Comments
	it is important to acknowledge that some developments, such as social or community housing, will not be profitable due to their inherent nature and objectives.
9. Do you agree with the proposal to replace the current 'reasonably expected to be realised' test with a higher-level requirement for capacity to be 'realistic'?	The council considers that there is no material difference whether "reasonably expected to be realised" or "realistic" is used as a test for development capacity. It will depend on what guidance is provided in terms of the criteria to consider. The council **agrees** that aspects such as use of covenants and slopes/flooding/Significant Natural Areas etc should be included in any calculation of plan-enabled capacity. However, realistic capacity is often more about market deliverability. For example, high density four storey walk-up apartments are more realistic in Auckland than Hamilton due to the local nature of that market at this point in time.
10. What aspects of capacity assessments would benefit from greater prescription and consistency?	The council **agrees** that there is benefit in standardisation but with the ability to reflect the local context, e.g. Hamilton City has a high level of infill development (more than 50 percent) but the surrounding districts have much less. The council sees benefit in standardising input assumptions on plan standards such as site coverage. Calculation methods should also attempt to standardise a yield range and material cost assumption including inputs like geotechnical costs and flood management which may be overlooked in ground preparation costs.
11. Should councils be able to use the growth projection they consider to be most likely for assessing whether there is sufficient infrastructure-ready capacity?	The council **agrees** that territorial authorities should be able to use the growth projection they consider to be most likely for assessing whether there is sufficient infrastructure-ready capacity. Councils should not have to provide for a theoretical level of development.
12. How can we balance the need to set minimum levels of quality for demonstrating infrastructure capacity with the flexibility required to ensure they are implementable by all applicable councils?	The council **supports** making infrastructure assessment requirements clearer, including setting the level of detail that should be required for infrastructure assessments (both local and whole trunk strategic networks) and requiring assessments to account for cumulative growth. This last part is very difficult for brownfield developments as it requires an understanding of headroom in the local network. Assessments for land on the peri-urban fringe should include impacts on the operation and level of service provided by rural drainage networks, which can be put under pressure by increased duration and intensity of flows from urban development Clear guidance of where and when the wider strategic network needs to be considered would be useful. This could be for development sites that provide more than a certain number of houses or units. Bespoke, more flexible on-site solutions should be allowed for smaller infill sites.

Questions	Comments
	Cumulative growth infrastructure assessments would be more detailed and would come with costs that ideally could be attributable to development levies over a larger area.
13. What level of detail should be required when assessing whether capacity is infrastructure-ready? For instance, should this be limited to plant equipment (e.g. treatment plants, pumping stations) and trunk mains/key roads, or should it also include local pipes and roads?	The council considers that the infrastructure assessment should be in relation to all the infrastructure that will be required to service the development of the site. This includes the pipes, pumpstations, drains, flood management scheme, upgrades to wastewater treatment plants, local roads, public transport, and also the water allocation required to service the site if this can't be accommodated within the council's existing allocation. It should also include additional infrastructure (as defined in the NPS-UD, e.g. social and community infrastructure). Housing needs to be delivered in a way that supports liveable neighbourhoods with schools, parks and open spaces, employment options and social services.
14. Do you agree with the proposed requirement for council planning decisions to be responsive to price efficiency indicators?	We **do not agree** with overreliance on price efficiency indicators as the sole measure for how the housing markets are functioning. The purpose of the housing growth targets is presumably to ensure that supply is sufficiently elastic so that increased demand does not lead to excessive property price increase. A simplistic approach that mandates an increase in residential land supply has a high likelihood of being confounded by characteristics of the local market, with unintended consequences and/or a failure to achieve the policy objective. Understanding the structure of local land markets and how they are functioning is a good step towards meeting policy objectives. Estimating the price efficiency indicators described is, therefore, considered to be a worthwhile task. However, it not clear that these indicators always have straightforward interpretation, and consequently there is a risk that an overly prescriptive response to indicator estimates may also lead to unintended consequences. Further, responding to short term cyclical market movements may be costly to local authorities and therefore ratepayers, and create volatility and risk to residential property markets. The expectation of bringing down urban land value through sprawl conflicts with the concept of cities maturing and making land values higher because more intensive use means land generates higher returns and better infrastructure efficiencies. Expecting urban land values to fall as cities pursue intensification is unrealistic.
15. Do you agree that councils should be required to provide enough development capacity	The council **does not agree** that councils should enable enough development capacity for business land in their plans to meet 30 years of demand but agrees that it should be identified in a strategic document such as the regional spatial plan.

Questions	Comments
for business land to meet 30 years of demand?	The council appreciates that the purpose of providing development capacity is, again, to ensure that business land is available at something approximating a perfectly competitive price. It is less clear why the 30-year horizon is considered universally appropriate. As with the household projections, there is little reason to consider that contemporary 30-year projections will be even approximately accurate, resulting in a high risk of significant under- or over-provision. Both of these are likely to be extremely costly outcomes. An approach that facilitates more flexibility in providing capacity is far more likely to achieve efficient outcomes. Demand for business land is harder to predict than for housing – it fluctuates more with economic cycles and businesses often have specific locational preferences which means some areas develop quickly and others stagnate (e.g. Pōkeno versus Tuakau). This often results in pressure to change the zone of the business zoned land to other uses if it is not taken up in a certain timeframe. Demand for business land is also more likely to be influenced by technological advances and new ways of working. The council **recommends** that councils have discretion in how much business land is enabled up front because of the nuances of business demand projection, but agrees there needs to be wide discussion on business land monitoring, uptake/vacancy rates and land banking of commercial land. In the case of both business and residential land, some factors will be more within a local authority's control than others – for example, case of market failure which is outside of councils' control. Where indicators point to private land banking as a significant issue, councils may themselves be constrained in their ability to change this – at least without some means of curtailing private landowners' rent-seeking behaviour. Standardised zones for industrial and commercial land should provide more certainty over what activities can and cannot occur in these zones so councils can determine what level of activity may be planned for. Standardised zones for industrial land should be very clear on what employment activities can occur within them to protect them from becoming a de facto commercial/retail zone.
16. Are mechanisms needed in the new resource management system to ensure councils are responsive to unanticipated or out-of-sequence developments? If so, how should these be designed?	The council **agrees** there should be a mechanism to consider new development proposals, however, if councils are putting time and resource into spatial planning and ensuring that the infrastructure required to enable 30 years of zoned land is planned and delivered, **new proposals should have to demonstrate their merit to justify the diverted effort and resourcing**. There also needs to be a mechanism to ensure that new development areas aren't undermining existing growth areas or infrastructure. Future Proof has recently completed its future development strategy (FDS) which provides for more than a 30-year supply of residential growth and identifies the infrastructure required to support it. But instead of now being able to implement the FDS, Future Proof is having to divert significant staff time and resources to manage the large number of fast-track applications on the

Questions	Comments
	fringe of Hamilton (both listed in the FTAA and a growing number of referral applications) that require infrastructure provision and integration. In some cases, this will mean diverting planned infrastructure capacity away from already identified growth areas (such as priority development areas), or require upgrades to infrastructure that was not anticipated. For example, the Waikato Expressway was planned based on a 30 year land use pattern as set out in the Future Proof Strategy/FDS and had an accompanying network plan prepared in collaboration with NZ Transport Agency Waka Kotahi to manage impacts on the surrounding local road network. Future Proof is now seeing unanticipated development proposals that would necessitate upgrades to the expressway within a few years of its completion, such as upgrades to, or additional, on-ramps. A key benefit of spatial planning is to provide certainty as to how an area will develop in the future. This certainty encourages investment commitments. Changing tack undermines certainty and commitment to investing in infrastructure. For example, NZ Transport Agency was not willing to commit to the Waikato Expressway without certainty around land use planning around Hamilton. This was the driving force behind the establishment of Future Proof. Any responsiveness criteria should link to environmental limits/constraints in a regional spatial plan. Councils need to be able to restrict development proposed outside of environmental limits or in areas of constraints e.g. flood plains, deep peat or areas with significant biodiversity values, as identified in a spatial plan. The criteria should also require that the development does not compromise existing and proposed infrastructure. In terms of growth paying for growth, there is an opportunity through the design of Pillar 2 improvements to use infrastructure funding and financing tools like development levies to specifically detail the triggers and what is expected for out-of-sequence developments. Infrastructure triggers (identified in spatial plans) should be listed and 'agreed' through transparent private development agreements to show developers are demonstrating costs of unexpected growth are covered and not taken up by the ratepayer.
17. How should any responsiveness requirements in the new system incorporate the direction for 'growth to pay for growth'?	The council **recommends** that a key criterion should be funding of infrastructure within, and the additional demand a development creates for infrastructure outside of, an unanticipated development. For example, changes to public transport routes, upgrades to wastewater treatment plants, resource consents for additional water allocation for drinking water, etc. There also needs to be consideration of the impact of urban development being located in rural drainage systems, particularly those managed by regional council's where landowners pay a targeted rate to ensure an agreed level of service e.g. removal of standing water from a 1 in 20 year event within 3 days to prevent pasture die off. If this level of service is not able to be delivered because of new urban development within a drainage scheme, upgrades or additional work required to maintain the agreed level

Questions	Comments
	of services should be paid for by the developer rather than the affected rural landowner or the regional council (and therefore the ratepayer).
18. Do you agree with the proposal that the new resource management system is clear that councils are not able to include a policy, objective or rule that sets an urban limit or a rural-urban boundary line in their planning documents for the purposes of urban containment? If not, how should the system best give effect to Cabinet direction to not have rural-urban boundary lines in plans?	The council **does not agree** with preventing councils from being able to include a policy, objective or rule that sets an urban limit or a rural-urban boundary line in their planning documents for the purposes of urban containment. The council is **concerned** that having no urban rural boundary and allowing for unbridled urban expansion as the key method to achieve competitive urban land markets will not create well-functioning urban environments. The ability for developments to go anywhere, anytime, all at once reduces developer certainty, reduces feasibility of public transport, and reduces integrated land use efficiencies of infrastructure planning and investment. It creates private car dependence, additional traffic congestion and can lead to areas of deprivation due to lack of viable transport options. The settlement pattern for the Future Proof subregion is underpinned by a compact and concentrated spatial approach. This scenario (plus others) was consulted on when the Future Proof strategy was developed and was ranked the highest and had the most public support. The removal of a rural-urban boundary line would go against this principle, allowing unnecessary urban sprawl. The benefits of a compact and concentrated approach to growth include better use of existing infrastructure, improved transport outcomes such as greater public transport use, greater social and cultural vitality, more opportunities for place-making and community connectedness, improved agglomeration of centres and their viability, regeneration of existing urban areas, and preservation of the rural and natural environment. Hamilton City does not have an urban-rural hinterland and any further expansion would require a boundary adjustment with Waipā and Waikato district councils. Strategic agreements are in place for future expansion but this requires considered planning and staging. Removing the urban limit around Hamilton City would allow ad hoc urban sprawl into the rural areas of Waipā and Waikato districts. If the proposed policies which increase urban sprawl proceed, central government funding for public transport should be increased to cover cost of running services to a more dispersed passenger base. Appendix 2 demonstrates the impact land use approaches have on the feasibility and cost of providing public transport.
19. Do you agree that the future resource management system should prohibit any provisions in spatial or regulatory plans that would prevent leapfrogging? If not, why not?	The council **does not support** limitations on being able to prevent leapfrogging. Leapfrogging creates logistical issues with providing infrastructure. If infrastructure is provided to a distant site through an area identified for future growth, that infrastructure will need to either be sized to accommodate the full level of development, or will need to be upgraded in the future to allow the full level of development to occur. This is an inefficient way to provide

Questions	Comments
	infrastructure and it is difficult to allocate costs where the full level of infrastructure is provided up front. Investment may be tied up in infrastructure that is not needed until sometime in the future. The council has concerns with on-site systems for water and wastewater being used as an infrastructure solution to leapfrogging development, that the management of the systems falls over and councils are forced to take on aging and/or non-compliant systems. Further, there is a risk of infrastructure being 'stranded' if the wider planned development and associated infrastructure does not occur, again with the council and the ratepayer likely picking up the cost of maintaining and servicing disconnected sites. If councils are unable to prevent leapfrogging, there should be a mechanism to allow for the leapfrogging developer to pay for the infrastructure and recoup from leapfrogged properties when they develop. Leapfrogging also is hard to service with public transport. It is not economically viable to continue extending public transport services into ever more expanding suburbs. Enabling housing growth without planned and funded public transport also works against other national and regional objectives such as reducing transport emissions and ensuring access and mobility outcomes.
20. What role could spatial planning play in better enabling urban expansion?	The council **strongly supports** spatial planning and believes it has a role in enabling urban development in the right places. Spatial planning provides for integrated and staged land use and infrastructure provision, ideally with a view to how growth is funded. It does not constrain growth, but rather enables efficient and effective growth management through identifying key economic corridors, centres or priority development areas, informed through a robust assessment, acknowledging existing land use and market constraints. The council has initiated a spatial planning project to prepare a spatial strategy for the Waikato region. We have completed a Regional Spatial Inventory[7] to provide an evidence base, and prepared a draft framework for how the spatial strategy could be prepared for the region. Spatial planning should enable a controlled, flexible and responsive release of land, ideally through identifying priority development areas (greenfield and brownfield) but also to enable out of sequence growth where certain agreed criteria are met.
21. Do you agree with the proposed definitions for the two categories of 'key public	The council **supports** in principle, the proposed definitions for the two categories of 'key public transport corridors' which will mean that other areas outside of Auckland and Wellington that are well-serviced by public transport (such as Hamilton), but do not currently meet the definition of rapid transport service, are acknowledged as suitable for intensification. Denser urban form,

[7] Waikato Regional Spatial Inventory

Questions	Comments
transport corridors'? If not, why not?	where appropriate, supports the growth of public transport and helps to meet other national and regional objectives, such as lowering transport emissions and reducing travel times and congestion.
22. Do you agree with the intensification provisions applying to each category? If not, what should the requirements be?	The council **supports** in principle, the intensification provisions applying to each category. The council **supports** aligning with the NZ Transport Agency's One Network Framework classification.
23. Do you agree with councils being responsible for determining which corridors meet the definition of each of these categories	The council **agrees** with councils for being responsible for determining which corridors meet the definitions. This is important as different contexts and local circumstances will need to be taken into account.
24. Do you support Option 1, Option 2 or something else? Why?	We **support** in principle the need to define a walkable catchment and that the distance be "as walked", however, we are unclear of the rationale behind the different measurements in Option 1 and Option 2, as this is not provided in the discussion document.
25. What are the key barriers to the delivery of four-to-six storey developments at present?	No comment.
26. For areas where councils are currently required to enable at least six storeys, should this be increased to more than six storeys? If so, what should it be increased to? Would this have a material impact on what is built?	No comment
27. For areas where councils are currently required to enable at least six storeys, what would be the costs and risks (if any)	Infrastructure modelling is based on maximum available plan enabled capacity. If headroom in the network is planned and funded for more than six stories in all key transit corridors or walkable catchments, then this means funding for infrastructure is taken from elsewhere which may be more feasible to develop.

Questions	Comments
of requiring councils to enable more than six storeys?	
28. Is offsetting for the loss of capacity in directed intensification areas required in the new resource management system?	The council **does not consider** that offsetting is necessary given the proposed greater emphasis on more permissive key transit corridors, walkable catchment and standardised zones. Councils are likely to be able to offset any reduction in plan-enabled capacity resulting from genuine qualifying matters though the process of enabling housing capacity to meet housing targets. This allows councils to decide where the most appropriate areas are for meeting their housing targets.
29. If offsetting is required, how should an equivalent area be determined?	If offsetting is to occur, equivalent land value could be a consideration but shouldn't be the sole determinant for where to intensify. If there is already sufficient development capacity provided, offsetting shouldn't be required.
30. Is an equivalent to the NPS-UD's policy 3(d) (as originally scoped) needed in the new resource management system? If so, are any changes needed to the policy to make it easier to implement?	This will depend on the nature (ie., how enabling it is) of standardised zoning for general residential and medium density residential zones.
31. What controls need to be put in place to allow residential, commercial and community activities to take place in proximity to each other without significant negative externalities?	This will depend on the scale and degree of activities and their interrelationship. Some reverse sensitivity activities can be managed by setbacks, buffers, noise controls, orientation of windows, landscaping, sound attenuation measures, lighting cowls, height limits, light spill, traffic management plans etc. depending on the interrelationship and zoning provisions. All these are largely consenting issues at the time of resource consent. However, if the intent is to reduce what can be considered by a resource consent in the new system, there is potentially a need to consider how particularly sensitive land uses could be impacted by certain developments e.g. having a truck depot next to a primary school where having a large number of truck movements could impact the safety of the pupils going to and from school, or a 24 hour noise-generating activity next to a hospital or apartment building.
32. What areas should be required to use zones that enable a wide mix of uses?	The council **agrees** that there is scope for a greater range of uses in specific locations such as near train centres or city and metro centres. Metropolitan and city centres should provide for a wide range and mix of uses (office, retail, supermarkets etc) which will be different in scale to a local neighbourhood centre that is likely to only provide for day to day needs such as a dairy or coffee shop.

Questions	Comments
	National standards should set out the range and mix of activities that apply to each business zone and councils would determine which zones are appropriate for their locality based on the existing suite of activities and surrounding catchment.
33. Which rules under the current system do you consider would either not meet the definition of an externality or have a disproportionate impact on development feasibility?	No comment
34. Do you consider changes should be made to the current approach on how requirements are targeted? If so, what changes do you consider should be made?	The council **agrees** that changes should be made to the current NPS-UD approach to its application. As defined Tier 1 territorial authorities, Waipā and Waikato Districts are very different from Hamilton City, and this should be recognised in the NPS-UD. While the parts of those districts close to the boundary to Hamilton city form part of the metro area, and influence and are influenced by the city, the remainder of the districts are comprised of small towns and villages that should not be subject to the same Tier 1 requirements (other than the northern part of Waikato District which forms part of the Auckland urban environment). Housing and Business Assessments are costly and time consuming and often span very different residential markets in the case of Waipā and Waikato District. Doing these assessments across all of these districts is not necessarily effective or efficient. The Hamilton-Waikato Metro Spatial Plan identifies an area which would be more suitable for the Tier 1 policies to apply. The Hamilton-Waikato metro area is an urban sub-region with Hamilton at the core and extending from Taupiri in the north to Te Awamutu and Cambridge in the south.
35. Do you have any feedback on how the Going for Housing Growth proposals could impact on Māori?	The council considers that these proposals provide opportunities for iwi Māori *communities and whānau Māori, which includes local iwi, hapū, families, and mātāwaka (Māori from other iwi residing in the area).*, but effective delivery will depend on practical support, clear involvement, and ongoing engagement. Outcomes will rely on robust mechanisms for Māori participation and ensuring practical barriers are addressed. Continued input and adaptation are needed to ensure positive results for Māori communities as these proposals will likely affect iwi, hapū, marae and Māori communities across social, economic, health, cultural, and environmental areas. Iwi from the Future Proof sub-region are partners in Future Proof and the FDS reflects iwi aspirations, including the development of the priority development area at Ruakura which the partnership are working to unlock. **Opportunities** • More urban-zoned land and mixed-use options could improve Māori access to affordable housing.

Questions	Comments
	• Easing planning barriers may help iwi and Māori trusts develop papakāinga and kaumātua housing, though some barriers will still need tailored interventions. We note the current consultation on the proposed National Environmental Standards for Papakāinga (NES-P). • Mixed-use and intensification policies may allow more flexibility for marae, Māori enterprises, and community facilities in urban areas. • Aligning infrastructure investment with spatial planning could help address past underinvestment and support better outcomes for Māori communities. • The proposals may support intergenerational asset-building for Māori through improved tenure security and more choices for development. • Urban and environmental planning integration may support protection of wāhi tapu, cultural landscapes, and customary rights. **Risks and Challenges** • There are system-level issues to resolve for equitable outcomes. • Lack of mechanisms for Māori participation may limit the effectiveness of the proposals; further engagement with Māori is needed. • The unique status and ownership of whenua Māori—such as access to infrastructure, finance, or land aggregation—may still require dedicated solutions. • Centralised, standardised policy settings and reduced council discretion may reduce local input and Māori engagement. • There is a risk of increased land values and urban development displacing Māori communities, unless affordable housing protections are in place. • Environmental impacts from urban growth may affect cultural values and relationships with land and waterways if not well managed. • A focus on standardisation may benefit larger developers and limit opportunities for small Māori entities and trusts. • Fragmentation of whenua Māori and limited capacity for planning and consent processes could disadvantage Māori if not addressed.

Questions	Comments
36. Do you have any other feedback on Going for Housing Growth proposals and how they should be reflected in the new resource management system?	The council **strongly supports** the ability under the new system to have mechanisms in plans to achieve genuinely affordable housing. Just providing more housing is not going to solve the ongoing issue of housing unaffordability. Currently, providing small medium density units is seen as providing affordable housing as it is more affordable than a standalone house, but a two-bedroom unit is not a suitable option for a large family. In New South Whales (NSW) Australia, the State Environmental Planning Policy (Housing) 2021 provides incentives in terms of more enabling provisions for developments that provide genuine affordable housing. Central government should consider whether more enabling or "bonus" provisions, in tandem with mechanisms to ensure affordable housing is retained as affordable, could be used in the new system. The council also **recommends** looking at private covenants in tandem with the new system – they are effectively private "rules" that impact the efficient development of land and generally increase the cost of consenting and building.
37. Should Tier 1 and 2 councils be required to prepare or review their HBA and FDS in accordance with current NPS-UD requirements ahead of 2027 long-term plans? Why or why not?	The council **supports** continuing to do some level of HBA assessment, as this helps councils to understand how they are tracking against previous projections and predictions of growth. It also helps inform decisions about infrastructure funding and staging. The council **recommends** given the timeframes that councils are not required to review their current FDS unless they choose to. This is an inefficient use of resourcing given that the new spatial plans that replace the FDS are intended to be started in 2027. For the Future Proof subregion, there is significant pressure at present from listed and potential projects under the FTAA; it would be useful to wait to see what projects eventuate before undertaking a review of the FDS, as the outcomes will need to be factored into future planning for land use and infrastructure.

Appendix 1 – Land release provisions used in current NSW plans – Extract from Shoalhaven Local Environmental Plan 2014 (Shoalhaven Local Environmental Plan 2014 - NSW Legislation)

Part 6 Urban release areas

6.2 Public utility infrastructure

(1) Development consent must not be granted for development on land in an urban release area unless the Council is satisfied that any public utility infrastructure that is essential for the proposed development is available or that adequate arrangements have been made to make that infrastructure available when it is required.

(2) This clause does not apply to development for the purpose of providing, extending, augmenting, maintaining or repairing any public utility infrastructure.

6.3 Development control plan

(1) The objective of this clause is to ensure that development on land in an urban release area occurs in a logical and cost-effective manner, in accordance with a staging plan and only after a development control plan that includes specific controls has been prepared for the land.

(2) Development consent must not be granted for development on land in an urban release area unless a development control plan that provides for the matters specified in subclause (3) has been prepared for the land.

(3) The development control plan must provide for all of the following—

(a) a staging plan for the timely and efficient release of urban land, making provision for necessary infrastructure and sequencing,

(b) an overall transport movement hierarchy showing the major circulation routes and connections to achieve a simple and safe movement system for private vehicles, public transport, pedestrians and cyclists,

(c) an overall landscaping strategy for the protection and enhancement of riparian areas and remnant vegetation, including visually prominent locations, and detailed landscaping requirements for both the public and private domain,

(d) a network of active and passive recreation areas,

(e) stormwater and water quality management controls,

(f) amelioration of natural and environmental hazards, including bush fire, flooding and site contamination and, in relation to natural hazards, the safe occupation of, and the evacuation from, any land so affected,

(g) detailed urban design controls for significant development sites,

(h) measures to encourage higher density living around transport, open space and service nodes,

(i) measures to accommodate and control appropriate neighbourhood commercial and retail uses,

(j) suitably located public facilities and services, including provision for appropriate traffic management facilities and parking.

(4) Subclause (2) does not apply to development for any of the following purposes—

(a) a subdivision for the purpose of a realignment of boundaries that does not create additional lots,

(b) a subdivision of land if any of the lots proposed to be created is to be reserved or dedicated for public open space, public roads or any other public or environment protection purpose,

(c) a subdivision of land in a zone in which the erection of structures is prohibited,

(d) development on land (but not subdivision of land) that is of a minor nature only, if the consent authority is of the opinion that the carrying out of the development would be consistent with the objectives of the zone in which the land is situated and will not adversely affect development in the urban release area.

6.4 Relationship between Part and remainder of Plan

A provision of this Part prevails over any other provision of this Plan to the extent of any inconsistency.

6.5 Exceptions to minimum lot size—subdivision of land in approved land use zones

(1) The objective of this clause is to allow for the subdivision of particular land that is wholly or partly in an urban release area to create 1 or more new lots (each a ***residual lot***) of a size that is less than the minimum lot size shown on the *Lot Size Map* in relation to the land in particular circumstances.

(2) This clause applies to a lot (the ***original lot***) if the original lot, or part of the original lot is—

(a) in an urban release area, and

(b) in an approved land use zone.

(3) Development consent may be granted to subdivision of the original lot to create a residual lot of a size that is less than the minimum lot size shown on the *Lot Size Map* in relation to the land comprising the residual lot if the residual lot is wholly within an approved land use zone.

(4) In this clause—

approved land use zone means any of the following land use zones—

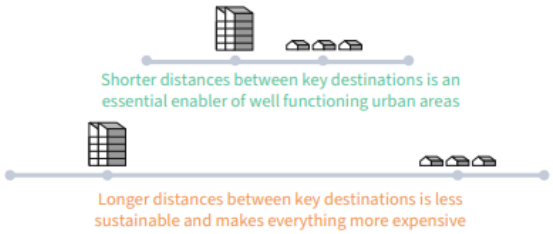
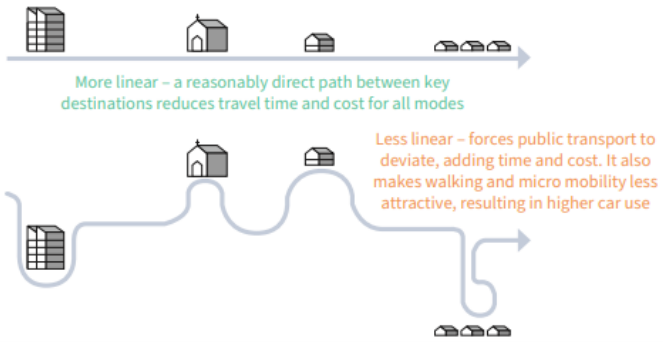
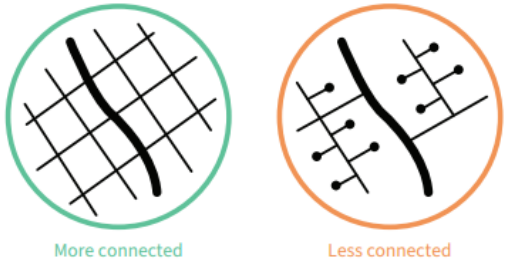
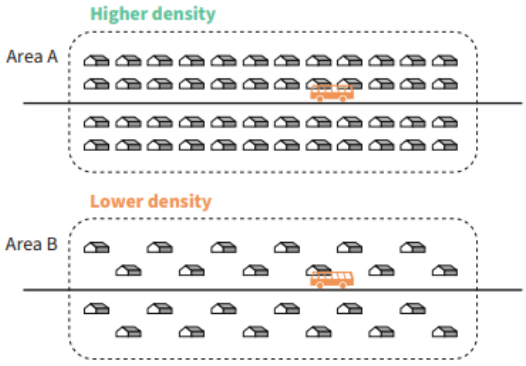
(a) Zone RU1 Primary Production,

(b) Zone RU2 Rural Landscape,

(c) Zone C2 Environmental Conservation,

(d) Zone C3 Environmental Management.

Appendix 2: Extract from the Waikato Regional Public Transport Plan (2022-2032-RPTP-document.pdf)

Urban form factor		Macro urban implications (Related, but not limited to public transport)		
Proximity			**When things are further apart**	**When things are closer together**
		Energy demand	Higher	Lower
		GHG emissions	Higher	Lower
		Consumption of land	Higher	Lower
		Impact on nature	Higher	Lower
		Cost of infrastructure	Higher	Lower
		Cost of housing	Higher	Lower
		Cost of transport	Higher	Lower
		Viability of micro mobility	Lower	Greater
		Access to opportunities	Lower	Greater
Linearity			**When things are less linear**	**When things are more linear**
		Energy demand	Depends on the specific development and context	
		GHG emissions		
		Consumption of land		
		Impact on nature		
		Cost of infrastructure		
		Cost of housing		
		Cost of transport	Higher	Lower
		Viability of micro mobility	Lower	Greater
		Access to opportunities	Lower	Greater
Connectivity			**When things are less connected**	**When things are more connected**
		Energy demand	Depends on the specific development and context	
		GHG emissions		
		Consumption of land		
		Impact on nature		
		Cost of infrastructure		
		Cost of housing		
		Cost of transport	Higher	Lower
		Viability of micro mobility	Lower	Greater
		Access to opportunities	Lower	Greater
Density			**When things are less dense**	**When things are more dense**
		Energy demand	Higher	Lower
		GHG emissions	Higher	Lower
		Consumption of land	Higher	Lower
		Impact on nature	Higher	Lower
		Cost of infrastructure	Higher	Lower
		Cost of housing	Higher	Lower
		Cost of transport	Higher	Lower
		Viability of micro mobility	Lower	Greater
		Access to opportunities	Lower	Greater