



## PROACTIVE RELEASE COVERSHEET

<b>Minister</b>	Chris Bishop	<b>Portfolio</b>	RMA Reform
<b>Title of briefing paper</b>	BRF-6127 Further request from Christchurch City Council for more time to complete its intensification planning instrument (April 2025)	<b>Date to be published</b>	27 June 2025

### List of documents that have been proactively released

<b>Date</b>	<b>Title</b>	<b>Author</b>
1 May 2025	BRF-6127 Further request from Christchurch City Council for more time to complete its intensification planning instrument (April 2025)	Ministry for the Environment
9 May 2025	Signed letter to Mayor Phil Mauger on minister's decision on extension request	Hon Chris Bishop, Minister Responsible for RMA Reform

#### Information redacted: YES

Any information redacted in this document is redacted in accordance with the Ministry for the Environment's policy on proactive release and is labelled with the reason for redaction. This may include information that would be redacted if this information was requested under Official Information Act 1982. Where this is the case, the reasons for withholding information are listed below. Where information has been withheld, no public interest has been identified that would outweigh the reasons for withholding it.

#### Summary of reasons for redaction

Some information has been withheld under Section 9(2)(a) of the Official Information Act 1982 to protect the privacy of natural persons, including that of deceased natural persons.

Some information has been withheld under Section 9(2)(h) of the Official Information Act 1982 for the reason of maintaining legal professional privilege.



## Briefing: Further request from Christchurch City Council for more time to complete its intensification planning instrument (April 2025)

Date submitted: 1 May 2025

Tracking number: BRF-6127

Security level: In-Confidence

MfE priority: Non-urgent

### Actions sought from Ministers

<i>Name and position</i>	<i>Action sought</i>	<i>Response by</i>
To Hon Chris BISHOP <b>Minister Responsible for RMA Reform</b>	<b>Record</b> decisions on recommendations	15 May 2025
CC Hon Penny SIMMONDS <b>Minister for the Environment</b>	No action required	N/A

### Actions for Minister's office staff

**Return** the signed briefing to the Ministry for the Environment s 9(2)(a)

**Send** response letter (Appendix 3) to the Mayor of Christchurch, Phil Mauger.

### Appendices and attachments

1. Appendix 1: Letter from Mayor of Christchurch, Phil Mauger requesting more time to complete the Intensification Streamlined Planning Process.
2. Appendix 2: Summary of timeline of Christchurch City Council's Intensification Planning Instrument.
3. Appendix 3: Draft response to Christchurch City Council's request for an extension to its Intensification Planning Instrument.

### Key contacts at Ministry for the Environment

<i>Position</i>	<i>Name</i>	<i>Cell phone</i>	<i>First contact</i>
Responsible Manager	Stephanie Gard'ner	s 9(2)(a)	✓
General Manager	Martyn Pinckard	s 9(2)(a)	

### Minister's comments

# Further request from Christchurch City Council for more time to complete its intensification planning instrument (April 2025)

## Key messages

---

1. This briefing seeks your decision on whether to grant Christchurch City Council's (the Council's) request for more time to complete the Intensification Streamlined Planning Process (ISPP). This is the Council's fourth request for more time to complete the ISPP since 7 June 2023.
2. On 8 April 2025, the Council wrote to you (Appendix 1) to request to amend the Direction<sup>1</sup> to provide an additional nine months to notify its decisions on the IHP's recommendations on parts of Plan Change 14 that are **not** subject to Policies 3 and 4 (intensification provisions) of the National Policy Statement on Urban Development 2020 (NPS-UD). This would shift the notification date from 12 December 2025 until 30 September 2026.
3. The Council considers an additional nine months is needed to ensure opting out of the Medium Density Residential Standards (MDRS) "remains an option" for the Council, and to accommodate the process in the Resource Management (Consenting and Other System Changes) Amendment Bill 2024 (the Bill) to enable the Council to withdraw parts of Plan Change 14.
4. We recommend you decline the Council's request as an additional nine-month extension would not achieve an expeditious planning process, as required by section 80L(3) of the Resource Management Act 1991 (RMA). The IHP provided its recommendations to the Council on 29 July 2024 and in our view, there has been sufficient time for the Council to assess and make decisions on the IHP's recommendations. A number of extension requests have already been granted, and a further extension would push the timeframe to be over double the standard plan change timeframe specified in the RMA.
5. We acknowledge there are a range of reasons for the Council's request, and there are relevant interactions between the Bill, the Council's next steps, and timeframes for Plan Change 14. Due to parliamentary privilege, we cannot share advice on the Bill with the Council prior to the Select Committee's report back (scheduled for mid-June 2025). However, we consider there should be sufficient time for the Council to consider its position and prepare to proceed (whatever the outcome in the Bill) after the Select Committee report back and still meet the 12 December 2025 deadline.
6. There is a risk the Council may delay these decisions and not meet its 12 December 2025 deadline and therefore be non-compliant with the RMA. We consider this risk is partially mitigated by noting in the response letter to Mayor Mauger that the Select Committee is due to report back to the House on the Bill in mid-June 2025, at which point the Council will be able to gain a better understanding the direction of travel for the

---

<sup>1</sup> The Resource Management (Direction for the Intensification Streamlined Planning Process to the First Tranche of Specified Territorial Authorities) Notice 2022.

Bill. In our view, declining the request sends a clear signal that you expect the Council to continue making progress to enable development capacity in Christchurch.

7. If you agree to decline the Council's ISPP extension request, we recommend that you send the Council the letter in Appendix 3 informing them of your decision.
8. If you would like to make a different decision to the one recommended in this briefing, or to clarify any matters, we suggest meeting with you to discuss.

## Recommendations

---

We recommend that you:

- a. **note** Christchurch City Council's current timeframe for completing parts of Plan Change 14 that are not subject to Policies 3 and 4 of the National Policy Statement on Urban Development 2020 is 12 December 2025

### EITHER

- b. **agree** to decline Christchurch City Council's request for an additional nine months (until 30 September 2026) to complete the Intensification Streamlined Planning Process for parts of Plan Change 14 that are not subject to Policies 3 and 4 of the National Policy Statement on Urban Development 2020

Yes | No

- c. **sign** the letter in Appendix 3 to the Mayor of Christchurch, Phil Mauer, notifying them of your decision and the reasons for your decision

Yes | No

### OR

- d. **meet** with officials for further discussion

Yes | No

## Signatures

---

Stephanie Gard'ner  
**Manager, Urban Policy**  
**1 May 2025**

Hon Chris BISHOP  
**Minister Responsible for RMA Reform**  
**Date:**

# Further request from Christchurch City Council for more time to complete its intensification planning instrument (April 2025)

## Purpose

---

1. This briefing seeks your decision on Christchurch City Council's (the Council) request to amend the Direction<sup>2</sup> to provide for an additional nine months until 30 September 2026 to complete the Intensification Streamlined Planning Process (ISPP) for those parts of its Intensification Planning Instrument (IPI), Plan Change 14, that are **not** subject to Policies 3 and 4 (intensification provisions) of the National Policy Statement on Urban Development 2020 (NPS-UD).

## Background

---

2. The Resource Management Act 1991 (RMA) requires the Council to notify an IPI using the ISPP. The IPI must give effect to Policies 3 and 4 (intensification provisions) of the National Policy Statement on Urban Development 2020 (NPS-UD) and incorporate the Medium Density Residential Standards (MDRS) into the Council's district plan.
3. The timeframes of the ISPP, including the date by which the Council is required to complete its IPI, can be prescribed by a direction from you (sections 80L and 80M). Any such direction is secondary legislation and must be notified in the New Zealand Gazette.
4. The RMA requires, as part of the ISPP, that an Independent Hearings Panel (IHP) make recommendations on the Council's IPI. The final step for the Council to complete the ISPP is for the Council to notify its decisions on these recommendations.

### *Setting and amending ISPP timeframes*

5. The RMA enables the Minister for the Environment to set and amend a council's ISPP timeframes (sections 80L and 80M). The Prime Minister has agreed that you have portfolio responsibility, as Minister Responsible for RMA Reform, for these statutory decisions. You are able to exercise these powers in accordance with section 7 of the Constitution Act 1986.
6. You can make a direction under section 80L of the RMA to direct one or more specified territorial authorities in relation to a number of ISPP requirements, including "1 or more periods of time within which the specified territorial authority must complete 1 or more stages of the ISPP" (section 80L(1)(c)).
7. For amendments to a direction under section 80M of the RMA, the same process is required as was followed for the original direction.

---

<sup>2</sup> The Resource Management (Direction for the Intensification Streamlined Planning Process to the First Tranche of Specified Territorial Authorities) Notice 2022.

8. In deciding the content of the direction, you must have regard to providing "a process for the preparation of an IPI by a specified territorial authority in order to achieve an expeditious planning process" (sections 80L(3)).

*Context on the Council's IPI and previous extension requests*

9. On 11 April 2022, the former Minister for the Environment directed the Council to notify its decisions on the IHP's recommendations by 20 August 2023.
10. On 13 September 2022, the Council voted not to notify its intensification plan change. The former Minister for the Environment decided to undertake an investigation under section 24A of RMA into how the Council was performing its functions in relation to notifying an IPI. An independent person was appointed to conduct the investigation and work constructively with the Council. Following the investigation, the Council notified its IPI called Plan Change 14, on 17 March 2023.
11. On 7 June 2023, the Council requested a 13-month extension to notify its decisions on the IHP's recommendations on Plan Change 14. The former Minister of the Environment granted the Council an extension until 12 September 2024 and introduced reporting requirements.
12. On 8 December 2023, the Council requested a further extension in response to the release of the Government's proposed Going for Housing Growth policy. On 13 February 2024, you and Hon Penny Simmonds met with the Mayor of Christchurch to discuss the Council's extension request.
13. On 26 March 2024, you granted the Council a partial extension of 15 months [BRF-4432 refers]. You directed the Council to notify decisions on the IHP's recommendations on the parts of PC14 **not** subject to Policies 3 and 4 of the NPS-UD by **12 December 2025**. The timeframes for parts of PC14 **subject to** Policies 3 and 4 of the NPS-UD remained 12 September 2024.
14. On 29 July 2024, the IHP provided its recommendations to the Council on all aspects of Plan Change 14.
15. On 22 August 2024, the Council requested a three-month extension to complete the ISPP for those parts of its IPI **subject to** Policies 3 and 4 of the NPS-UD, until **20 December 2024**, which you granted [BRF-5249 refers].

*The Council's decisions on the IHP's recommendations to date*

16. On 18 September 2024, the Council made its first decisions on the IHP's recommendations, when it accepted the recommendations in respect of part of the City Centre zone, related qualifying matters and the delisting of six heritage items. These provisions were made operative on 3 October 2024 and are now part of the District Plan.
17. On 2 December 2024, the Council made decisions on those parts of its IPI **subject to** Policies 3 and 4 of the NPS-UD. The Council accepted 58 IHP recommendations and rejected 20 IHP recommendations, and referred those rejected recommendations to you for final decisions on 24 February 2025. We will provide you with advice on these rejected recommendations on 5 May 2025 [BRF-5720]. The Council complied with its amended timeframe for those parts of Plan Change 14 subject to Policies 3 and 4 (being 20 December 2024).

18. The Council has deferred its decisions on the IHP's recommendations on those parts of the plan change **not** subject to Policies 3 and 4 of the NPS-UD. Officials will provide you with further advice if the Council rejects any of these remaining IHP recommendations and refers them to you for final decisions.

*The Council's latest extension request*

19. On 8 April 2025, the Council wrote to you (Appendix 1) to request an additional nine months to notify its decisions on the IHP's recommendations on parts of Plan Change 14 that are **not** subject to Policies 3 and 4 of the NPS-UD until 30 September 2026 (from 12 December 2025). This is the Council's fourth request for more time to complete the ISPP since 7 June 2023.
20. A summary of the timeline of Plan Change 14 is provided in Appendix 2.

## **Analysis and advice**

---

*The Council has various reasons for its extension request*

21. In its letter (Appendix 1), the Council notes in requesting this nine month extension, it has considered both the current regulatory deadline of 12 December 2025 and the prospective ability to 'opt-out' of MDRS-related components of Plan Change 14 that it is yet to make decisions on, as proposed in the Resource Management (Consenting and Other System Changes) Amendment Bill 2024 (the Bill).
22. The Council's submission on the Bill sought a "simple and cost-effective means to withdraw those parts of the MDRS that are undecided" and noted that it is also "strongly opposed to any requirement to enter into a multiyear plan change process" so soon after a substantial intensification plan change process [as noted in BRF-5936].
23. The Council considers that irrespective of changes made to the Bill, the current 12 December 2025 timeframe to complete the ISPP is no longer practicable and would not provide sufficient time to evaluate its options and seek your approval to withdraw parts of Plan Change 14.
24. The Council considers an additional nine months is needed to ensure opting out of the MDRS "remains an option", as not granting an extension would mean the Council would be required to make decisions on all remaining IHP recommendations. It considers this would lead to an inferior outcome and would reduce the effectiveness of delivering a plan change that gives effect to any future amended NPS-UD.

*There are interactions between the Council's extension request and the requirements in the Bill, and timeframes for its enactment*

25. The Council expects the Bill to enable them to opt-out of the MDRS. Its letter to you (Appendix 1) implies it intends to wait to begin work on an application to withdraw parts of Plan Change 14 after Royal Assent of the Bill, and to seek decisions on withdrawal post local government elections in February 2026.
26. Due to parliamentary privilege, we cannot share advice on the Bill with the Council, therefore it is not yet aware of the specific criteria that will likely apply before it can



withdraw parts of Plan Change 14 (although officials have engaged with Council officers to test the workability of options).

27. The Departmental Report recommends that the Council may withdraw its IPI once you are satisfied that Christchurch has sufficient feasible land zoned for housing use to meet 30 years of expected demand for housing plus a 20 percent contingency margin in its operative district plan. To meet this requirement, we anticipate that the Council will have to make decisions on some of the remaining IHP recommendations (ie, those **not** subject to policy 3 and 4) to make parts of PC14 operative, but not all of them. How much additional capacity the Council will need to enable will be dependent on its feasibility modelling (and your satisfaction that it meets the requirements). Where that capacity is enabled will be a choice for the Council.
28. Officials understand Council officers are currently undertaking work to update the feasibility modelling which will provide the evidence base for how much of Plan Change 14 will need to be operative and what can be withdrawn.
29. The Select Committee is due to report back to the House on the Bill in mid-June 2025, at which point the Council will better understand the direction of travel for the Bill, and would allow it to begin work to ensure it meets the requirements in its operative district plan (ie, make decisions on some of the remaining recommendations) before it applies to withdraw the remaining parts of Plan Change 14.
30. Officials understand the Council is currently undertaking work to update its feasibility modelling which will provide an evidence base for how much of Plan Change 14 will need to be operative and what can be withdrawn. The Council has signalled this work will take approximately two-months.

*We recommend you decline the Council's request for more time to complete the ISPP*

31. We recommend you decline the Council's request for an additional nine months until 30 September 2026 to notify its decisions on the IHP's recommendations on the parts of PC14 **not** subject to Policies 3 and 4 of the NPS-UD. This would mean the current timeframe of 12 December 2025 would remain.
32. In considering section 80L(3), an additional nine-month extension would not achieve an expeditious planning process in accordance with section 80D of the RMA, particularly given the IHP provided its recommendations to the Council 29 July 2024, and the previous granted requests for extensions. In our view, there has been sufficient time for the Council to assess and make decisions on the IHP's recommendations.
33. We also note appeal rights were removed from the ISPP to ensure a faster plan change process compared to a standard Schedule 1 process, thereby enabling development capacity in a timely manner. An additional extension of time would further delay enabling development capacity in Christchurch to over double the standard plan change timeframe specified in the RMA.
34. We acknowledge there are a range of reasons for the Council's request, and there are interactions between the Bill and timeframes for decisions on Plan Change 14. However, while tight, we consider there should be sufficient time for the Council to consider its position and prepare to proceed (whatever the outcome in the Bill) after the Select Committee report back and still meet the 12 December deadline.

35. We recommend your letter back to the Council (draft provided in Appendix 3) states you are declining the Council's request at this time, noting the Select Committee is due to report back to the House on the Bill in mid-June 2025, at which point the Council will be able to gain a better understanding the direction of travel for the Bill.
36. In our view, declining the Council's request also signals your expectation for the Council to continue to enable additional development capacity in Christchurch.

## **Te Tiriti analysis**

---

37. No Treaty of Waitangi / Te Tiriti o Waitangi issues are associated with the proposals in this briefing.

## **Other considerations**

---

### **Consultation and engagement**

38. No consultation with other agencies has been undertaken. The Ministry of Housing and Urban Development have been informed of the Council's extension request.

### **Risks and mitigations**

39. There is a risk the Council may delay relevant decisions and not meet its 12 December 2025 deadline and therefore be non-compliant with the RMA. This risk exists whether you grant or decline an extension. Declining an extension means this risk of non-compliance would continue to sit with the Council and not shift to central government and you as the responsible Minister. If the Council does not meet its deadline, we would provide you with advice on next steps for compliance and enforcement options, if appropriate.
40. We consider this risk is partially mitigated by declining the Council's request, noting in the response letter to Mayor Mauger that the Select Committee is due to report back to the House on the Bill in mid-June 2025, at which point the Council will be able to gain a better understanding the direction of travel for the Bill.
41. In our view, this sends a clear signal that you expect the Council to continue making progress to enable development capacity in Christchurch regardless of the outcome of the Bill.

**s 9(2)(h)**

42. **s 9(2)(h)**

43. **s 9(2)(h)**

44. s 9(2)(h) [REDACTED]
45. s 9(2)(h) [REDACTED]
46. s 9(2)(h) [REDACTED]
47. s 9(2)(h) [REDACTED]
48. s 9(2)(h) [REDACTED]
49. s 9(2)(h) [REDACTED]
50. s 9(2)(h) [REDACTED]

## Financial, regulatory and legislative implications

51. No financial, regulatory, or legislative implications are associated with the proposals in this briefing.

## Next steps

---

52. If you agree to decline the Council's ISPP extension request, we recommend that you send the Council the letter in Appendix 3 informing them of your decision.

53. If you would like to make a different decision to the one recommended in this briefing, or to clarify any matters, we suggest meeting with you to discuss.

## **Appendix 1: Letter from Mayor of Christchurch, Phil Mauer requesting more time to complete the Intensification Streamlined Planning Process**

---

[Attached to cover briefing].

8 April 2025

Hon Chris Bishop  
Minister for RMA Reform  
PO Box 18041  
Parliament Buildings  
Wellington 6160

Email: [c.bishop@ministers.govt.nz](mailto:c.bishop@ministers.govt.nz)

Tēnā koe Minister

## Decisions on Intensification Planning Instrument – Plan Change 14 – Request for modification of timeframe under section 80M(3) of the Resource Management Act

We are writing to seek an extension to 30 September 2026 to notify decisions on the balance of the Independent Hearing Panel (IHP) recommendations on our Intensification Planning Instrument (IPI), Plan Change 14 (PC14).

### Scheduling of PC14 final decision and MDRS opt-out

On 2 December 2024, Christchurch City Council (Council) made decisions on part of PC14. Those decisions were timed in accordance with the Gazette Notice of 16 September 2024 which directed that Council must notify decisions on IHP recommendations related to Policies 3 and 4 of the National Policy Statement on Urban Development (NPS-UD) by 20 December 2024 and notify decisions on the balance by 12 December 2025.

We have now considered both the current regulatory deadline of 12 December 2025 and the prospective ability to 'opt-out' of undecided MDRS components of the plan change proposed under the Resource Management (Consenting and Other System Changes) Amendment Bill 2024.

Your approval for Council to have separate decision dates between IHP recommendations implementing Policies 3 and 4 of the NPS-UD and other IHP recommendations was, in part, because of planned changes to the Act intended to enable opt-out of the MDRS. The final December 2025 date was estimated based on when those legislative changes may come into effect and how a Council could seek to opt-out of the MDRS.

Current estimates are that the Environment Select Committee will report back to the House in June this year, with the Bill likely to receive Royal Assent by August.

In its current form, the Bill sets several requirements for any Council seeking to opt-out of the MDRS, including:

- a 12-month period from Royal Assent before applications can be made;
- evaluative requirements for any application; and
- the requirement to initiate a Streamlined Planning Process to give effect to the revised 2025 NPS-UD for any opt-out.

Council has made a submission against these aspects of the Bill and are grateful for Ministry staff engaging with us on the changes sought in that submission to address our unique position.

Irrespective of changes made to the Bill, we do not consider that the current 12 December 2025 deadline to make a decision on the balance of PC14 is practicable and are therefore seeking an extension to 30 September 2026. The Council will not be in a position to evaluate its options until the Bill comes into effect, and once in effect, the process to consider options, meet any evaluative requirements, and seek the approval of the Minister is certain to take longer than the period up to 12 December 2025.

Furthermore, this additional period is needed to ensure that having an opt-out of the MDRS (even in-part) remains an option. Not providing an extension is likely to mean that Council's only option is to make a decision on all of the IHP Recommendations. Given the forthcoming changes to the Act, we are of the view that doing so would lead to an inferior outcome, reducing the future effectiveness of delivering any future NPS-UD.

If the changes sought in Council's submission on the Bill are made, then what Council would be deciding upon is likely to better deliver any future NPS-UD and ensures that adequate resources are available to deliver this future plan change.

### Modified timetable for Plan Change 14

Council requests that the Minister amend under s80M(3) his direction under s80L(1)(c) of the date by which the Council notifies a decision on the balance of the IHP recommendations on the ISPP.

We have prepared a timeline for the remainder of the plan change (Attachment 1). We consider that the time provided is necessary for producing a good quality assessment of issues, assessment of prerequisites of the Act, and sound decision making.

The following addresses the matters that the Minister must have regard to under s80L(3), being Sub-part 5A of the Act (s80D to s80N) and Part 6 of the First Schedule of the Act.

#### *Consideration of Sub-part 5A:*

- (a) Council has produced an IPI, which has proceeded through the hearing process. The IHP issued their Recommendations to Council in July 2024.
- (b) PC14 incorporated a variety of more enabling controls to support a competitive consenting framework that incentivises greater levels of uptake and intensification.



- (c) Council on 2 December 2024 decided on IHP recommendations on implementing Policies 3 and 4 of the NPS-UD and the MDRS within these areas, as well as Financial Contributions across the urban environment.
- (d) Council's report on IHP recommendations rejected and Council's alternative recommendations was delivered to you on 24 February 2025.
- (e) Reporting by Council has been transparent throughout its IPI on how it has sought to incorporate MDRS across residential provisions, including the application of qualifying matters. Proposed provisions were annotated to clearly show where MDRS-derived or where text had been made more lenient in accordance with the Act.
- (f) No other Ministerial directions have been made under s80L to s80N .

*Consideration of Part 6 of Schedule 1:*

- (g) Council has produced an Intensification Planning Instrument and initiated an ISPP in accordance with the requirements of the Act.
- (h) Council established an IHP in mid-2022, incorporating the views of Te Rūnanga o Ngāi Tahu, and it first convened on 2 September 2022. The IHP consists of five members, with one being appointed by mana whenua, and Ms C. Robinson as Panel Chair.
- (i) In accordance with the Act, s32 evaluation reporting and associated content have been made publicly available on the Council's webpage.

To this end, we have notified the plan change, made a decision in-part, and continue to provide as much guidance as practicable. The Council is providing clear messaging, with a Consenting Newsletter providing detailed information on the current status of the plan change to stakeholders and weighting given to provisions.

We welcome the opportunity to discuss this request in further detail with you or Ministry staff.

Yours sincerely



Phil Mauger  
**Mayor of Christchurch**



## Attachment 1 – Prospective timeframe for MDRS opt-out and final PC14 decisions

Approximate Timing	Decision/Milestone	Involving
August 2025	Royal Assent of Resource Management (Consenting and Other System Changes) Amendment Act	Government
September 2025	Councils' review MDRS opt-out criteria and begin any required evaluation work	Council
11 October 2025	Local Government Elections	Territorial Authorities
November 2025	New Councils' form	Territorial Authorities
December 2025	First Council meetings, potential initial discussion on MDRS opt-out	Council
January 2026	Council complete draft evaluation reporting for MDRS opt-out application	Council
February 2026	Seek Council endorsement of MDRS opt-out application and associated reporting	Council
March 2026	MDRS opt-out application and associated reporting formally submitted to Minister	Government
Before end of Q2	Minister approves MDRS opt-out request	Government
Before end of Q3	Council partially withdraws PC14 in accordance with MDRS opt-out and makes final decision on PC14.	Council

## **Appendix 2: Summary of timeline of Christchurch City Council's Intensification Planning Instrument**

---

Summary of timeline of Christchurch City Council's Intensification Planning Instrument	
Date	Step
<b>2022</b>	
11 April 2022	Council directed to notify its decisions on the IHP's recommendations by 20 August 2023.
13 September 2022	Council voted not to notify its intensification plan change.
<b>2023</b>	
November 2022 to April 2023	Section 24A investigation undertaken.
17 March 2023	Council notified its IPI, Plan Change 14.
7 June 2023	Council requested 13-month extension to complete ISPP. Former Minister of the Environment granted extension until 12 September 2024.
8 December 2023	Council requested further extension in response to the release of the Government's proposed Going for Housing Growth policy.
<b>2024</b>	
13 February 2024	You met with the Minister for the Environment and the Mayor of Christchurch to discuss the Council's extension request.
26 March 2024	You granted a partial extension of 15 months to notify decisions on the IHP's recommendations on the parts of PC14 <b>not</b> subject to Policies 3 and 4 of the NPS-UD by 12 December 2025 [BRF-4432 refers].
29 July 2024	IHP provided its recommendations to the Council on Plan Change 14.
22 August 2024	Council requested a three-month extension to complete the ISPP for those parts of its IPI <b>subject to</b> Policies 3 and 4 of the NPS-UD, until 20 December 2024, which you granted [BRF-5249 refers].
18 September 2024	Council made its first decisions on the IHP's recommendations (accepted recommendations for part of the City Centre zone, related qualifying matters and the delisting of six heritage items). The relevant provisions were made operative on 3 October 2024 and are now part of the District Plan.
2 December 2024	Council made decisions on those parts of its IPI <b>subject to</b> Policies 3 and 4 of the NPS-UD. The Council accepted 58 IHP recommendations and rejected 20 IHP recommendations.
<b>2025</b>	
24 February 2025	Council referred the 20 rejected recommendations to you for final decisions.
8 April 2025	Council requested an additional nine months to complete the ISPP for those parts of PC14 <b>not</b> subject to Policies 3 and 4 of the NPS-UD until 30 September 2026 (from 12 December 2025).

### **Appendix 3: Draft response to Christchurch City Council's request for an extension to its Intensification Planning Instrument**

---

[Date]

Phil Mauger  
Mayor  
Christchurch City Council  
Via email: [mayor@ccc.govt.nz](mailto:mayor@ccc.govt.nz)

Dear Mayor Phil Mauger

**Decision on Christchurch City Council's request for an amendment to its Direction under section 80M of the Resource Management Act 1991**

Thank you for your letter of 8 April 2025 requesting an amendment to *The Resource Management (Direction for the Intensification Streamlined Planning Process to the First Tranche of Specified Territorial Authorities) Notice 2022*, providing Christchurch City Council an additional nine months until 30 September 2026 to complete the Intensification Streamlined Planning Process (ISPP).

I am declining this extension request at this time as I consider that any additional time to complete the ISPP would not achieve an expeditious planning process, as required by the Resource Management Act 1991. In reaching this decision I have considered the previous extensions and the overall time that would result from a further extension, noting it would be over double the standard plan change timeframe specified in the RMA. I also note there has been sufficient time for the Council to assess and make decisions on the IHP's recommendations, which it received in July 2024. Additionally, the reasons provided by the Council in support of the extension are not related to supporting an expeditious process per s80D, or more broadly to fulfilling the purpose of the IPI provisions in the RMA. Therefore, the Council is still required to notify its decisions on the remaining parts of Plan Change 14 by 12 December 2025.

I do however acknowledge the Council's position on Plan Change 14 and note there are interactions with the *Resource Management (Consenting and Other System Changes) Amendment Bill 2024* (the Bill). I want to thank you for Council staff time in testing the workability of options with my officials. This was useful to inform officials' advice to the Select Committee on the Bill. The Select Committee is scheduled to report back to the House on the Bill in mid-June 2025, at which point the Council will be able to gain a better understanding of the direction of travel for the Bill. I consider there should be sufficient time for the Council to consider its position and prepare to proceed (regardless of the outcome in the Bill) after the Select Committee report back and still meet the 12 December deadline.

Thank you for your work on Plan Change 14 to date. I encourage Council staff to continue to work with government officials on enabling development capacity in Christchurch.

Yours sincerely

Hon Chris Bishop  
**Minister Responsible for RMA Reform**

# Hon Chris Bishop

Minister of Housing  
Minister for Infrastructure  
Minister Responsible for RMA Reform  
Minister of Transport  
Leader of the House  
Associate Minister of Finance  
Associate Minister for Sport and Recreation



9 May 2025

CB-COR1439

Phil Mauger  
Mayor  
Christchurch City Council  
By email: [mayor@ccc.govt.nz](mailto:mayor@ccc.govt.nz)

Dear Mayor Phil Mauger,

**Decision on Christchurch City Council's request for an amendment to its Direction under section 80M of the Resource Management Act 1991**

Thank you for your letter of 8 April 2025 requesting an amendment to *The Resource Management (Direction for the Intensification Streamlined Planning Process to the First Tranche of Specified Territorial Authorities) Notice 2022*. You have requested an extension of nine months, until 30 September 2026, for Christchurch City Council (the Council) to complete the Intensification Streamlined Planning Process (ISPP).

I am declining this extension request as I consider that any additional time to complete the ISPP would not achieve an expeditious planning process, as required by the Resource Management Act 1991 (RMA). I have considered previous extensions and the cumulative effect that a further extension would have, noting the overall timeframe would significantly exceed the standard plan change timeframe specified in the RMA. I also note the Council received the Independent Hearings Panel's recommendations in July 2024, allowing sufficient time to make decisions. The reasons provided for the extension do not meet the intent of section 80D or support the purpose of the Intensification Planning Instrument provisions in the RMA.

Therefore, the Council is still required to notify its decisions on the remaining parts of Plan Change 14 by 12 December 2025.

I acknowledge the Council's position on Plan Change 14 and the links to the Resource Management (Consenting and Other System Changes) Amendment Bill 2024 (the Bill). Thank you to Council staff for testing the workability of options with my officials. This has been helpful in informing officials' advice to the Select Committee on the Bill. The Select Committee is scheduled to report back to the House on the Bill in June 2025. I consider there should be sufficient time for the Council to consider its position and prepare to proceed (regardless of the outcome in the Bill) after the Select Committee's report back and still meet the 12 December deadline.

Thank you for your ongoing work on Plan Change 14. I encourage Council staff to continue engaging with officials on enabling development capacity in Christchurch.

Yours sincerely

Hon Chris Bishop  
Minister Responsible for RMA Reform