



09 July 2024

Hon Chris Bishop
Minister Responsible for RMA Reform
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Parliament Buildings
Wellington 6160
Email: grannyflats@MBIE.govt.nz

Dear Minister,

Proposed Changes to Planning Rules – “Granny Flats” – Feedback from the Urban Task Force for Tauranga (UTF)

The Urban Task Force for Tauranga (UTF) is pleased to see the Government's latest plans regarding reform of planning rules to provide for a second dwelling on properties.

The UTF has been incorporated as a society with its purpose being to represent Tauranga property professionals and funders, developers, iwi and hapu, and owners and managers of property.

The UTF seeks to provide strong and informed leadership to central, regional and local Government, promoting and fostering productive local networks around property and related issues, and as an advocate for the property and development industry in the Bay of Plenty.

The UTF supports and strongly endorses the Government's intentions to enable second dwellings. We are vocal in supporting initiatives for further housing supply, particularly in the Tauranga housing market. We consider that the introduction of a permitted second dwelling through revised planning regulations will greatly assist Tauranga with its current housing supply problems.

The current projections shown in the most recent 2024 SmartGrowth Strategy indicate that Tauranga faces a housing deficit (short medium and long term) in the order of 6,500 dwellings. The three local Councils have taken too long to rezone land, and restrictions in the Regional Policy Statement continue to hinder growth and housing supply.

Although recent initiatives such as the Tauriko West and the adoption of a medium density residential zone across the city are now proceeding, further more immediate and innovative initiatives are needed to urgently increase the supply of housing in the subregion.

The UTF supports Option 4, the adoption of a national environmental standard (NES) for secondary residential units with consistent permitted activity standards across all Districts.

Our feedback on specific provisions which should be incorporated within the NES is as follows:

1. **Naming** - The concept of a “granny flat” relates to planning terminology from the 1960’s. In our view the NES should refer to the dwellings as “second dwellings”. Typically, the dwellings are not designed for a single person.
2. **Quality** - Second dwellings should be designed and constructed in accordance with the requirements of the NZ Building Code. UTF support the requirement to waive the need for a building consent by establishing a new Schedule in the Building Act. This will provide for an exemption from a building consent for simple standalone dwellings up to 60 square metres.
3. **Construction Criteria** – In order to manage increased health and safety risks, construction criteria associated with second dwellings should be included. These should include the use of a Licenced Building Practitioner, along with the ability to adopt the Building Codes Acceptable Solutions (i.e. structure, weathertightness and plumbing & drainage related solutions).
4. **Scale** - In residential zones we agree with the proposal to provide for 60m² in terms of a Gross Floor Area (GFA) for second dwellings. The measurement should be internal and should be based on habitable rooms, i.e. garages and carports are excluded. This should be clear in the definition of a secondary dwelling to be included in the NES. Having no GFA would result in significant and unplanned demand on infrastructure which can be limited through the scale of the building which in term restricts occupancy (ie typically up to two persons).

In Rural Zones we consider that no GFA should apply as sites in rural zones typically have the ability to absorb the amenity effects from “pepper potted” development, with sufficient space available to provide for wastewater and water servicing (such as onsite effluent disposal and water tanks). Locally in the Western Bay of Plenty we can foresee that a large number of secondary dwellings could be established on existing lifestyle properties around the fringes of Tauranga with little or no impact on infrastructure. Existing rural roading infrastructure can be efficiently utilised. There is a significant number of small rural land parcels (circa 8,000 lots) in the sub region which can accommodate a second dwelling.

5. **Planning Performance standards** - The UTF agree that second dwellings will need to comply with specific NES activity performance standards such as height in relation to boundary, coverage, yards, and building height. If such standards are not applied under an NES, then standards for permitted activity dwellings could apply under existing District Plan rules. Our preference is for NES standards so that there is consistency across the country.
6. **Notification requirement** – if a building consent exemption is to be applied, then the landowner should provide a record to Councils that the new dwelling exists, thus informing Council infrastructure and financing decisions, enabling monitoring of quality issues, and enabling accurate updates to rating valuations. This notification could be undertaken by the LBP as the certifier.

7. **Impact of other National Policy Statement for Highly Productive Land (NPS-HPL)** – The UTF are concerned that the NPS-HPL will act to discourage the development of second dwellings in rural locations. An appropriate amendment/exemption is therefore required to provide for up to two dwellings as permitted on any rural site under the NPS.

We hope that the above feedback is of assistance to you. We would be happy to meet with your officials to discuss the above and how these provisions will likely benefit Tauranga.

UTFs view is that future housing supply remains a pressing issue for our sub-region, and we are happy to share our further thoughts on other policy changes necessary to resolve the worsening housing supply shortfall in Tauranga.

Yours faithfully



Scott Adams
Chairman

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