

By email

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Hon Chris Bishop, Minister of Resource Management Reform
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Kia Ora Koutou,

Zombie Subdivisions

This letter calls for the exclusion of large-scale residential development in rural and peri-urban areas, from the Fast Track Approvals Act 2024.

Greater Wellington supports the need for sustainable housing growth and recognizes supported by efficient planning and consenting processes. We are supportive of the provisions for regional spatial planning which appear in the Planning Bill, currently at Parliament's Committee of the Whole stage.

But we do not support fast-tracking zombie subdivisions. Zombie subdivisions are stalled residential developments, often conceived outside of planning and market realities. Fast-tracking has the real potential to serve up ad-hoc decisions that are disconnected from the region growth trajectory and realities of infrastructure provision to serve new communities. Recent fast-track approvals indicate that this is now a very real possibility in the Wellington Region, as already being experienced in Auckland and Queenstown.

The Wellington region already has a number of fast tracked green fields subdivision projects which have the potential to serve up significant costs for ratepayers and taxpayers.

Greater Wellington Regional Council has responsibilities for many aspects of infrastructure which are directly affected by urban form and density, including regional land transport priority setting, the provision of public transport, the protection of communities from flooding

and inundation, as well as environmental monitoring of the impacts of new subdivisions. Greater Wellington will support urban growth, but this needs to be done in a planned, coordinated and staged manner, not dictated by the whims of large-scale property developers.

To be clear, fast-tracking large-scale residential housing in rural and peri-urban areas creates a range of problems, including:

- Forcing growth into places where growth was never planned for, placing immense pressure on public infrastructure, potentially overwhelming pipes and roads.
- This includes connections to water and wastewater infrastructure. Wellington already has ageing infrastructure, and any additional growth must be accompanied by appropriate investment in these essential services.
- Shifting much of the costs of this growth from developers on to ratepayers and taxpayers, forcing them to subsidise billions of dollars' worth of infrastructure that would otherwise be invested elsewhere.
- If a developer wants to build a new town in the middle of the countryside, the people paying the bill shouldn't be Wellington ratepayers. The current system privatises the profit and socialises the cost.
- Fast Track was supposed to help deliver nationally significant infrastructure, not become a shortcut for speculative housing developments that bypass local planning.
- Undermining the spatial plans that councils have worked on with communities in recent years (as well as future regional spatial plans), making a mockery of local democracy.
- Significantly adding to Regional council workload in relation to monitoring and containing the environmental impacts of (e.g. site visits, the geospatial checks, turbidity monitoring, and the enforcement, all without any extra resourcing).
- Developers gaining fast-track approval and immediately selling the land on at a profit, delivering no immediate housing growth or other benefits to communities.

Many of these problems were foreshadowed to the government in Greater Wellington's submission to the Fast Track Approvals Bill.

Every Fast-Track project increases both the environmental risk and the pressure on our compliance teams. These provisions come at a time when the government is still insistent on introducing rates capping for local authorities. Something must give here – I suggest that

councils will simply not be able to stretch to accommodate ad-hoc subdivisions, with zombie subdivisions being the result.

A pause on existing greenfield housing fast track applications and removing these developments from the fast-track system altogether is the only way forward.

By doing so, we will return the system to the main purpose it was originally intended to serve - cutting through red tape to get nationally and regionally significant infrastructure consented (e.g. Riverlink Project).

We remain committed to working with the Government to deliver ambitious housing growth, but it must be growth that is infrastructure-ready, financially sustainable, and planned in partnership with local communities and councils.

New Zealand deserves housing development that creates lasting value, rather than transferring long-term costs and risks from ad-hoc housing projects to ratepayers and taxpayers.

Nga mihi



Daran Ponter

Chair

Greater Wellington Regional Council

CC: Leaders, New Zealand Parliamentary Parties

Members of Parliament, Wellington Capital Region/ Te Upoko o te Ika a Maui

Mayors and Iwi Chairs, Wellington Capital Region / Te Upoko o te Ika a Maui