

BEFORE INDEPENDENT HEARING COMMISSIONERS

IN THE KĀPITI COAST DISTRICT

MUA NGĀ KAIKŌMIHANA WHAKAWĀ TE WHAKAMINENGA O KĀPITI

IN THE MATTER

of the Resource Management Act 1991

AND

IN THE MATTER

**of the hearing of submissions on the Kāpiti
Coast District Plan Proposed Plan Change 2**

**STATEMENT OF PRIMARY EVIDENCE OF GURVINDERPAL SINGH
ON BEHALF OF KĀINGA ORA - HOMES AND COMMUNITIES**

(CORPORATE)

10 MARCH 2023

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1. EXECUTIVE SUMMARY

1.1 My name is Gurvinderpal Singh. I hold the position of Team Leader of Development Planning within the Urban Planning and Design Group at Kāinga Ora - Homes and Communities (**Kāinga Ora**).

1.2 The key points addressed in my evidence are:

- (a) The background to Kāinga Ora and the statutory context within which it operates;
- (b) Providing an overview of the Kāinga Ora portfolio within the Kāpiti Coast District; and
- (c) A summary of the Kāinga Ora submissions on the Kāpiti Coast IPI, including the rationale for the relief sought and in particular comments about:
 - (i) The extent to which the Council is giving effect to the National Policy Statement on Urban Development 2020 (**NPS-UD**) and the requirements of The Resource Management (Enabling Housing Supply and Other Matters) Amendment Act (**Amendment Act**);
 - (ii) The desirability of regional consistency;
 - (iii) The Residential Zones and proposed inclusion of a High Density Residential Zone (**HRZ**);
 - (iv) The maximum height in Metropolitan Centre;
 - (v) The expansion of the two Town Centres at Ōtaki;
 - (vi) The application and use of qualifying matters;
 - (vii) The appropriate application of Design Guides;
 - (viii) The application and use of financial contributions.

1.3 Kāinga Ora considers the current planning regulations across the District constrain the ability to create and deliver well-functioning urban environments. If the requested relief is adopted, this will not

only allow Kāinga Ora to adequately increase and improve its public housing provision, but it will also provide for significant development capacity and aid in the consenting and delivery of housing, being affordable housing, homes for first-home buyers, and significant market capacity across the city, and a choice of housing typology and size for all New Zealanders.

2. INTRODUCTION

2.1 My name is Gurvinderpal Singh. I hold the position of Team Leader of Development Planning within the Urban Planning and Design Group at Kāinga Ora.

2.2 I hold a Bachelor of Planning (Honours) from the University of Auckland and I am a Full Member of the New Zealand Planning Institute. I have held roles in the planning profession for the past 14 years and have been involved in advising on issues regarding the Resource Management Act 1991 (RMA) and district plans.

2.3 My experience includes ten years in various planning roles within local government. For the past 4 and a half years I have been employed by Kāinga Ora.

2.4 I have been providing development planning expertise within Kāinga Ora (as Housing New Zealand) since 2018. In this role I have:

- (a) Undertaken assessment and identification of redevelopment land within the portfolio;
- (b) Provided input into the strategic land planning, including the Asset Management Strategy, various investment and land use frameworks, and various structure plan processes of Kāinga Ora;
- (c) Provided advice on, and management of, the regulatory planning processes associated with Kāinga Ora residential development projects;

- (d) Managed engagement with local authorities, local communities and other agencies on matters relating to regulatory policy frameworks associated with residential development;
- (e) Provided advice on, and management of, input into strategic planning activities including plan changes and plan review processes throughout the country. More recently, this has included providing technical planning expertise and project management of Kāinga Ora submissions to the Proposed Whangārei District Plan, Proposed New Plymouth District Plan and the Proposed Waikato District Plan and submissions on Plan Changes implementing the Amendment Act and the **NPS-UD** across the Waikato, Bay of Plenty and Wellington Region.

2.5 I confirm that I am authorised to give corporate evidence on behalf of Kāinga Ora in respect of Kāpiti Coast District Council's Plan Change 2 (PC2).

3. BACKGROUND TO KĀINGA ORA

3.1 Kāinga Ora was formed in 2019 as a statutory entity established under the Kāinga Ora - Homes and Communities Act 2019 (**Kāinga Ora Act**), and brings together Housing New Zealand Corporation, HLC (2017) Ltd and parts of the KiwiBuild Unit. Under the Crown Entities Act 2004, Kāinga Ora is a crown entity and is required to give effect to Government policies.

The Government Policy Statement on Housing and Urban Development

3.2 The Government Policy Statement on Housing and Urban Development (**GPS-HUD**) was published on 28 September 2021 and provides a shared vision and direction across housing and urban development, to guide and inform the actions of all those who contribute to the housing and urban development sector. The GPS-

HUD outlines the need for concerted and ongoing action across six focus areas to realise the vision, outcomes, and future envisaged for Aotearoa New Zealand:

- (a) Ensure more affordable homes are built;
- (b) Ensure houses meet needs;
- (c) Enable people into stable, affordable homes;
- (d) Support whanau to have safe, healthy affordable homes with secure tenure;
- (e) Re-establish housing's primary role as a home rather than a financial asset; and
- (f) Plan and invest in our places.

The Kāinga Ora - Homes and Communities Act 2019

3.3 The Kāinga Ora - Homes and Communities Act sets out the functions of Kāinga Ora in relation to housing and urban development.

3.4 Kāinga Ora is the Government's delivery agency for housing and urban development. Kāinga Ora therefore works across the entire housing spectrum to build complete, diverse communities that enable New Zealanders from all backgrounds to have similar opportunities in life. As a result, Kāinga Ora has two core roles:

- (a) being a world class public housing landlord; and
- (b) leading and coordinating urban development projects.

3.5 The statutory objective¹ of Kāinga Ora requires it to contribute to sustainable, inclusive, and thriving communities through the promotion of a high quality urban form that:

- (a) provide people with good quality, affordable housing choices that meet diverse needs;

¹ Section 12, Kāinga Ora Homes and Communities Act 2019

- (b) support good access to jobs, amenities and services; and
- (c) otherwise sustain or enhance the overall economic, social, environmental and cultural well-being of current and future generations.

3.6 The statutory functions of Kāinga Ora in relation to urban development extend beyond the development of housing (which includes public housing, affordable housing, homes for first home buyers, and market housing) to the development and renewal of urban environments, as well as the development of related commercial, industrial, community, or other amenities, infrastructure, facilities, services or works.

3.7 In the capacity as an Urban Development Agency, the approach Kāinga Ora has taken across the IPI plan changes among Tier 1 authorities has been to ensure the intentions of the Amendment Act and the NPS-UD are incorporated within district plans appropriately and that ultimately permissive and/or enabling provisions are introduced through these plan changes to facilitate the creation of well-designed and well-functioning urban environments.

4. OVERVIEW OF THE KĀINGA ORA PROPERTY PORTFOLIO AND DEMAND

National Context

4.1 Kāinga Ora is responsible for providing homes to those most in need from the Ministry of Social Development Housing Register. Kāinga Ora is currently the largest residential landlord in New Zealand, providing public housing² to more than 186,000 people³ who face barriers (for a number of reasons) to housing in the wider rental and housing market.

4.2 Kāinga Ora owns or manages more than 69,000⁴ properties throughout New Zealand, including about 3,700 properties for

² Public housing is an umbrella term for state housing and community housing.

³ Kāinga Ora – Homes and Communities Annual Report 2022.

⁴ Managed stock as at 30 September 2022.

community groups that provide housing services and transitional housing.⁵

- 4.3 Public housing is a subset of affordable housing and meets the housing needs of people who face barriers to housing in the wider rental and housing market. In general terms, housing supply issues and broader events such as the Covid-19 global pandemic and financial market issues have made housing less affordable and as such there is an increased demand for public housing.
- 4.4 There has been a marked change in the type of public housing that is required by the Kāinga Ora tenant base:
- (a) Demand has increased for single bedroom housing required for single persons, the elderly or disabled, and larger homes with four to six bedrooms required to house larger families;
 - (b) As a result, the size of many state houses does not match the changing demand for public housing, with a substantial proportion of the Kāinga Ora housing stock comprising older 2-3 bedroom homes on large lots which are too large for smaller households and too small for larger households; and
 - (c) This has meant that Kāinga Ora has had to review its housing portfolio and assess how it can respond to the changes in demand, given its current housing supply is skewed towards 2-3-bedroom houses that do not meet the needs of tenants and/or are uneconomic to maintain.
- 4.5 Kāinga Ora is undertaking a major housing delivery programme with an additional 2,973 new public homes (including 946 leased to community housing providers) being added to the Kāinga Ora housing portfolio between October 2019 and October 2022⁶ and is seeking to meet an increasing demand to create more homes.

<https://kaingaora.govt.nz/assets/Publications/Managed-stock/Managed-Stock-National-Summary-September-2022.pdf>

⁵ As at 20 December 2022.

<https://kaingaora.govt.nz/working-with-us/supported-housing/>

⁶Ministry of Housing and Urban Development, Government Housing Dashboard

<https://www.hud.govt.nz/stats-and-insights/the-government-housing-dashboard/change-in-public-homes/#tabset>

Kāpiti Coast Context

- 4.6 Kāinga Ora manages a portfolio of approximately 220 properties in Kāpiti Coast District with 39% of this existing portfolio being three and four bedroom single-detached dwellings on large lots and only 5% consisting of 1 bedroom dwellings.⁷
- 4.7 Kāinga Ora has approximately 23,000 applicants⁸ (based on household) on the public housing waitlist across Aotearoa, with around 160 applicants seeking a home within Kāpiti Coast.⁹ This is approximately 7% of the waitlist demand for the Wellington region.¹⁰ The number of applicants seeking a home in Kāpiti Coast is similar to neighbouring Horowhenua District at 186 applicants but less than Porirua City (which is around 300 applicants).¹¹ Majority of this demand in Kāpiti Coast is for 1 and 2 bedroom homes, this need represents 89% of the waitlist.¹² Therefore, Kāinga Ora is having to consider how it repositions its portfolio to meet this demand.

5. THE KĀINGA ORA SUBMISSIONS

- 5.1 Kāinga Ora has lodged comprehensive submissions on PC2. These submissions arise from the operational and development needs of Kāinga Ora, but also reflect a wider interest in delivering the strategic vision and outcomes sought through the Amendment Act and the NPS-UD. The intent of the submissions is to ensure the delivery of a planning framework in Kāpiti Coast District that contributes to well-functioning urban environments that are sustainable, inclusive and contributes towards thriving communities that provide people with good quality, affordable housing choices and support access to jobs, amenities and services.
- 5.2 Through submissions on the various IPI processes across the country, one of the Kāinga Ora strategic goals is to ensure the

⁷ Managed stock by Territorial Local Authority as at 30 September 2022.

<https://kaingaora.govt.nz/assets/Publications/Managed-stock/Managed-Stock-TLA-September-2022.pdf>

⁸ Ministry of Social Development, Housing Register as at December 2022. <https://www.msd.govt.nz/about-msd-and-our-work/publications-resources/statistics/housing/housing-register.html>

⁹ Ministry of Social Development, Housing Register as at December 2022.

¹⁰ Ministry of Social Development, Housing Register as at December 2022.

¹¹ Ministry of Social Development, Housing Register as at December 2022.

¹² Ministry of Social Development, Housing Register as at December 2022.

implementation of the NPS-UD and the requirements of the Amendment Act achieve their stated outcomes.

- 5.3 It is undisputed that there is a high demand for housing in Aotearoa, and to supply a greater number of homes in locations that connect well to jobs, education, transport and amenities. There is, therefore, a strong need to build up, rather than out. Intensification, when done well, can bring a range of benefits to an area, such as greater opportunity for investment in infrastructure and local amenities, increased safety and a stronger sense of community and more public green spaces when part of comprehensive redevelopments.
- 5.4 As New Zealand's Urban Development Agency tasked with creating more homes across New Zealand at pace, Kāinga Ora supports plans that enable more people to live in locations that have good access to jobs, amenities and services that meet their day to day needs, and that enable enough housing supply so that current pressures are eased.
- 5.5 It is acknowledged that PC2 has the potential to reduce regulatory constraints, increase housing supply, and ultimately contribute to and provide for well-functioning urban environments for all New Zealanders. It has the opportunity to enable the delivery of a variety of homes to meet the needs of all people of Aotearoa.
- 5.6 The creation of provisions within District Plans to enable development in accordance with the NPS-UD and the Amendment Act will contribute towards a planning system that facilitates the delivery of a variety of homes with a focus on connectivity and functionality within the urban environment.
- 5.7 Kāinga Ora has focused on ensuring that local authorities do not undermine the step-change intended by the NPS-UD and the Amendment Act by protecting the status quo through overly liberal use of qualifying matters to reduce the application of the Policy 3 directives of the NPS-UD and the MDRS set out by the Amendment

Act. Seeking to favour the status quo in this way defeats the purpose of the NPS-UD and is inconsistent with Policy 6(b).

- 5.8 It is important that decision-makers appreciate the need to create a substantially more enabling planning framework. Not enabling higher density in an area based on its current attributes could lead, advertently or inadvertently, to undue planning restrictions in the medium to long term. What is (not) feasible today will change in the future as housing preferences continue to change and market conditions develop. The key is to ensure District Plan, as a result of PC2, does not act as the limiting factor in the event that market conditions change and higher density housing typologies and their development becomes more viable.

6. THE DESIRABILITY OF REGIONAL CONSISTENCY

- 6.1 The Kāinga Ora submission on PC2 has as one objective achieving broad consistency to intensification outcomes across Tier 1 councils, and more specifically, achieving a higher degree of regional consistency in Plans across the wider Wellington region - recognising that the Wellington housing and employment market operates in a regional context.
- 6.2 Key themes of the Kāinga Ora submissions on the various IPI processes occurring concurrently across the Wellington region are:
- (a) is the extent to which each IPI has appropriately responded to the shifts in national direction represented by the NPS-UD; and
 - (b) whether the proposed approaches to spatial zoning application and qualifying matters frustrate the extent to which the IPIs can deliver development in a manner consistent with the NPS-UD and the intent of the Amendment Act.

- 6.3 While there are certainly some areas of commonality and consistency across the plan changes/reviews, there are many divergences also. This includes:
- (a) variation in the residential zoning framework to give effect to the enabling requirements, where the High Density Residential Zone (HRZ) has been applied based on varying walkable catchment approaches;
 - (b) what height limits apply in areas subject to intensification as directed through Policy 3 of the NPS-UD;
 - (c) approach to the application of qualifying matters;
 - (d) varied application of MDRS in locations and/or zones where greater intensification is to be enabled; and
 - (e) how centres are classified.
- 6.4 The submissions have sought a spatial application of zoning patterns that acknowledge and respond appropriately to walkable catchments, corridors with rapid transport routes, and proximity to services, employment opportunities and the like, in a manner that is consistent with the principles of the NPS-UD. This includes seeking a defined and distinct spatial hierarchy and providing a clear distinction between the proposed residential zones and enabled heights commensurate with the anticipated future level of commercial activity and community services across the Wellington region.
- 6.5 If the Kāinga Ora submissions on the various IPI processes are adopted, particularly in relation to the above, then the constraints inherent in PC2 and associated plan changes in their notified form across the Wellington region would be reduced, and the various IPI processes would contribute to well-functioning urban environments that provide for greater development capacity and choice for additional homes across the Wellington region.

7. RESIDENTIAL ZONES

- 7.1 The Kāinga Ora submission on PC2 sought the replacement of the General Residential Zone with a new Medium Density Residential Zone (**MRZ**) together with the application of a HRZ. The notified PC2 did not include either of these two zones. The intention of the submission was to allow for medium to high density developments within the district, while also providing design flexibility, recognising the planned urban built form for development in the MRZ and HRZ, and enabling increased heights when proximate to centres and train station zoned sites (giving effect to Policy 3(c) and Policy 3(d) of the NPS-UD).
- 7.2 The reporting officers opposed the Kāinga Ora submissions on the residential planning framework. Kāinga Ora seeks for a clear and simplified set of provisions that are transparent to District Plan users on where greater intensification is enabled or provided. In our view, the notified PC2 does not do this clearly. It does not help the users of the Plan to distinguish where medium density and high density residential living is enabled in the district.
- 7.3 A District Plan should be easily readable. The National Planning Standards were introduced to make council plans easier to prepare, understand and comply with. The National Planning Standards also make council plans more consistent with each other, especially when it comes to mapping and zone framework.
- 7.4 Kāinga Ora seeks that the intended outcomes sought by the NPS-UD and the Amendment Act are clearly articulated in PC2 through the use of appropriate zones and provisions, complying with the National Planning Standards.
- 7.5 The intention of the submission was to emphasise the different outcomes sought between the MRZ and the HRZ, from those within the GRZ and to encourage a greater degree of intensity of built form and density than anticipated in the notified GRZ objectives. Kāinga Ora seeks that the District Plan identifies where MDR and HRZ is enabled and that this is clear to all users - both visually looking at

the District Plan maps as well as reading the appropriate zone chapter provisions - that draws the user to the specific zone and outcomes, not hidden under a layer of zones, precincts, rules and map layers that is difficult to navigate and interpret.

- 7.6 Consistent with National Planning Standards and neighbouring District Plans, Kāinga Ora seeks for the introduction of a HRZ, in place of the Residential Intensification Precincts, in Kāpiti Coast. The HRZ will provide the clarity and certainty to plan users on what is high density residential and where high density residential development is enabled and provided for in the region. While there is a General Residential Zone in PC2 that encapsulates the MDRS, Kāinga Ora remains of the view that this zone and its provisions function as a Medium Density Residential Zone despite its name.
- 7.7 I therefore consider that the amendments sought in evidence by Ms Williams on the introduction of the High Density Residential Zone and amendments to the General Residential Zone to PC2 will provide the clarity and certainty to all plan users, of where greater opportunities of residential development and intensification will occur in the region.

8. ZONING PRINCIPLES

- 8.1 As discussed above, Kāinga Ora has an inherent interest in urban development outcomes in Aotearoa. Kāinga Ora has taken a principled approach to walkable catchments and intensification adjacent to centres and rapid transit in response to the NPS-UD, which is used as a starting point to conduct location-specific analysis to test the principles and the appropriate response within a local context.
- 8.2 As specified in the evidence of Ms Williams and Mr Rae, site visits and local research was then carried out to determine appropriate walkable catchments, intensification, and built form outcomes for the Kāpiti Coast region.

- 8.3 The locally-specific walkable catchment and built form outcomes sought in the Kāinga Ora submissions, such as heights within and around centres, reflects the outcomes that Kāinga Ora seeks to achieve in providing for well-functioning urban environments that are responsive to the local and regional context and are supported by appropriate planning, urban design and economic expertise.
- 8.4 The findings of that locally-specific assessment have informed the approach taken to the Kāinga Ora submission on PC2. Kāinga Ora remains highly interested in the approach taken to walkable catchments and commensurate building heights and densities, as follows:
- (a) It is considered that a blanket ‘do minimum’ approach to building heights and extents of walkable catchments within PC2 does not appropriately respond to local context or demand for housing. Kāinga Ora remains interested in ensuring that building heights and densities are enabled which encourage the efficient use of land and which reflect the level of commercial activity and community services readily accessible in an area; and
 - (b) Further to the above, there is a high correlation between the locations of rapid transit stops, frequent bus services and active transport infrastructure, and extents of centre zones within the Kāpiti Coast urban environment, and it is considered that the ‘overlap’ of these services and amenities warrants a stronger and distinct response relative to standalone rapid transit stops and/or otherwise isolated centre zones. Kāinga Ora is of the view that this ‘overlap’ results in a compounding effect on surrounding amenity values, levels of service and accessibility, and ability to support intensification.
- 8.5 Kāinga Ora considers that there are wider benefits accrued as a result of the urban form that supports well-functioning urban environments, for example, reducing motor vehicle use and

achieving reduction in greenhouse gas emissions through intensifying around services, which contributes to the outcomes of wider government's priority policy areas such as the Emission Reduction Plan 2022-2025, without compromising on build capacity.

9. EXPANSION OF ŌTAKI TOWN CENTRES

- 9.1 Kāinga Ora submission sought for the minor expansion of two Town Centres in Ōtaki. There is great value in expanding these two Town Centres in Ōtaki - firstly to take advantage of the range of services and facilities provided in this locality and secondly gaining access to the regional rail network that provides people the choice to travel by train from Ōtaki into the Wellington region, and vice versa for people to travel to Ōtaki for live, work and play.
- 9.2 Mr Cullen evidence outlines his support for the submission and for additional commercial capacity and increased density for the two Town Centres in Ōtaki. Enabling the expansion of the two Town Centres will increase the housing supply and housing choice that will benefit Ōtaki and the Kapiti Coast District.

10. INCREASED HEIGHT IN METROPOLITAN CENTRE ZONE

- 10.1 Kāinga Ora has sought increased height in the Metropolitan Centre Zone to support design flexibility, planned urban built form, development density and height/daylight expectations. Enabling higher height limits where centres walkable catchments overlap was also sought. The purpose of this is to not only enable the development of homes within proximity to jobs, education, transport and amenities, but to also encourage a modal shift from private vehicle use to active transport and public transport.
- 10.2 The Kāinga Ora submission notes that whilst PC2 includes objectives to introduce higher density within the centres, the proposed height limits for the Centre and Mixed Use Zones do not support these objectives. It is the view of Kāinga Ora that there is a need to enable development in the Metropolitan Centre Zone that is at a

greater scale than that enabled and prescribed in PC2. The risk of not enabling more height in these locations could result in underutilising and underdevelopment of land within these zones.

- 10.3 Enabling the increased height in the Paraparumu Metropolitan Centre Zone would bring the regional centre in line with its regional comparators and provide further opportunities and incentivisation of residential living and employment activities in the Kāpiti Coast region.

11. COASTAL HAZARD QUALIFYING MATTERS

- 11.1 Kāinga Ora acknowledges and supports the identification and implementation of qualifying matters, where such matters are incompatible with what would otherwise be required by the Amendment Act and the NPS-UD, and where the Council has undertaken the appropriate assessment, consistent with the requirements of the RMA. Kāinga Ora recognises the role that qualifying matters play in managing issues that may otherwise result in adverse effects, and in ensuring positive outcomes that contribute to a well-functioning urban environment.
- 11.2 In the Kāpiti Coast district, the Council through PC2 has introduced the Coastal Hazard Qualifying Matter Precinct. Kāinga Ora made a submission to seek that the precinct is identified as an overlay and this was rejected by the Reporting Officer author as it is only in place until a future plan change is introduced on coastal hazards, at which time the Council may propose it as an overlay.
- 11.3 Kāinga Ora remains of the view that qualifying matters are most appropriately managed via overlays rather than through modifications to the underlying zone and/or zone provisions. The Kāinga Ora submission seeks that overlay provisions manage qualifying matters in these cases and supplement zone provisions to guide built form and development outcomes on a site, so as to reflect best practice urban built form principles whilst ensuring that the scale of development is compatible with the values needing

specific management as qualifying matters. It is considered that such an approach would simplify the planning framework and reduce ambiguity for plan users.

- 11.4 While the Council is planning for the plan change, the qualifying matter as proposed should be incorporated as an overlay as it is the appropriate use and planning method for identifying and managing such matters in the District Plan. This would be consistent with the National Planning Standards.

12. DESIGN GUIDES

- 12.1 Kāinga Ora takes a consistent position on the use and role of design guides within the development process.

- 12.2 Kāinga Ora seeks that Design Guidelines generally sit outside of the District Plan as a non-statutory document and assist the plan user as a guide informing the design process for proposals and to assist applicants understand how to achieve the planned outcomes of the plan. The planned outcomes should be clearly described and identified in objectives, policies, rules and relevant matters of discretion for activities and rules.

- 12.3 Design guidance should be seen as a tool to assist an applicant to understand the relevant objectives, policies and assessment criteria of a District Plan. The guide is simply that, a guide, and directly including it in the assessment criteria elevates the guide to a de facto rule or standard in its own right.

- 12.4 If there are critical outcomes that the Design Guidelines are trying to achieve, then these matters should be referred to in the relevant assessment criteria and/or matters of discretion and effects standards/rules in the District Plan. Design Guidelines are more appropriate as a non-statutory planning and advisory tool that can assist the plan-user in interpreting and complying with the District Plan provisions and, more importantly, any such guidelines can be

updated and amended accordingly to best practice without having to go through a RMA Schedule 1 process.

- 12.5 To some extent, this is consistent with the Kāinga Ora position on matters such as the appropriate approach to hazard maps which, because of their dynamic nature, are best left as non-statutory documents informing the approach to risk mitigation in the relevant plan, rather than being incorporated into the plan itself.

13. FINANCIAL CONTRIBUTIONS

- 13.1 Kainga Ora supports the proposed policy on Financial Contributions with amendments to reduce ambiguity of when financial contributions are incurred. The changes sought to FC-P3 should be made.
- 13.2 Kāinga Ora is of the view that financial contributions are only required where potential or actual adverse effects of a development cannot be avoided, remedied or mitigated through on site measures. This avoids any potential ‘double dipping’ for contributions otherwise levied as development contributions.

14. CONCLUSION

- 14.1 Current planning regulations in the Kāpiti Coast District constrain the ability to create and deliver well-functioning urban environments, as required by the Amendment Act and the NPS-UD. Overly restrictive regulations contribute to both land and housing supply issues. This puts pressure on house prices and contributes to the lack of affordable housing options across both the public and private housing sectors, whilst also failing to prioritise the redevelopment and intensification of the existing urban environment, particularly around strategic locations such as commercial centres and along key public transport nodes.
- 14.2 The Kāinga Ora submissions partially arise from the operational and development needs of Kāinga Ora. The Kāinga Ora submissions also ensure Kāinga Ora can economically and socially manage and

reconfigure its housing portfolio, which, as I have noted, is important to ensure housing stock is matched to demand. This is to enable provision of warm dry and healthy homes that are in the right location, right condition and of the right type to meet the current and future needs of those people requiring public housing assistance, as well as enable the development of affordable housing more generally.

- 14.3 Through its submissions on the PC2, Kāinga Ora is seeking to assist the Council to achieve the objective of creating a well-functioning urban environment. This can be done in a manner which enables the redevelopment of existing brownfield land to make better use of infrastructure (including social infrastructure) and improve the social and economic wellbeing of the community and is in line with the Amendment Act and the NPS-UD.
- 14.4 Kāinga Ora considers that if the Kāinga Ora submission on PC2 is adopted, then the constraints applied by the zoning and provisions of PC2 would be reduced. It would provide a development capacity for delivery of significant additional public housing, affordable housing, homes for first-home buyers, and significant market capacity across the city, and a choice of housing typology and size for all New Zealanders.

GURVINDERPAL SINGH

10 March 2023