

**BEFORE INDEPENDENT HEARING COMMISSIONERS
AT HUTT CITY**

**I MUA NGĀ KAIKŌMIHANA WHAKAWĀ MOTUHAKE
TE AWA KAIRANGI**

IN THE MATTER of the Resource Management Act 1991

AND

**IN THE MATTER of the hearing of submissions on Plan
Change 56 to the City of Lower Hutt
District Plan**

**HEARING TOPIC: Plan Change 56: Enabling Intensification in Residential
and Commercial Areas**

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

(CORPORATE)

29 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 Hutt City District; and
- (c) A summary of the Kāinga Ora submissions on Proposed Plan Change 56, 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 (**the Amendment Act**);
 - (ii) Acknowledgement of potential for increased built form outcomes within Hutt City that would better suit the role and function of particular centres and Hutt City urban environment, noting the upcoming District Plan Review;
 - (iii) The desirability of regional consistency;
 - (iv) Additional height controls in walkable catchments of Petone Metropolitan Centre and Hutt City Centre, and Local Centre Zones in Stokes Valley, Wainuiomata and Eastbourne;
 - (v) The inclusion of design guides within the District Plan;

- (vi) Proposed Residential Heritage Precincts, including the planning framework proposed and the inclusion of a number of Kāinga Ora landholdings that are considered to retain little heritage value; and
 - (vii) And the inclusion of flood hazard mapping as a planning map in the District Plan.
- 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, it will provide for increased development capacity in locations around the highest order centres in the Hutt City context, a built form that is consistent with the intent of the NPS-UD, 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.

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 Resource Management (Enabling Housing Supply and Other Matters) Amendment Act (**Amendment Act**) and the National Policy Statement on Urban Development 2020 (**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 Hutt City Council's Plan Change 56 (PC56).

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;
 - (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.

¹ Section 12, Kāinga Ora Homes and Communities Act 2019

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 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

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.

<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/>

(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.

Hutt City Context

4.6 Kāinga Ora manages a portfolio of approximately 3,449 properties in Hutt City District with 36% of this existing portfolio being three and four bedroom single-detached dwellings on large lots and only 11% 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 507 applicants seeking a home within Hutt City District.⁹ This is approximately 24% of the waitlist demand for the Wellington region.¹⁰ The number of applicants seeking a home in Hutt City is less than Wellington City (which is around 756 applicants).¹¹ Majority of this demand in Hutt City is for 1 and 2 bedroom homes, this need represents 84% of the waitlist.¹² Therefore, Kāinga Ora is having to consider how it repositions its portfolio to meet this demand.

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>

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.

5. THE KĀINGA ORA SUBMISSIONS

- 5.1 Kāinga Ora has lodged comprehensive submissions on PC 56. 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 Hutt City 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 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 PC56 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. It is noted that significant development capacity is enabled in Hutt City as proposed in PC56, largely due in part to the application of Policy 3(c) of the NPS-UD.

- 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 PC56, 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.
- 5.9 When implementing the NPS-UD, Kāinga Ora considers that further intensification, such as increased heights along frequent transport routes, around centres, and creating built form corridors between centres, would be appropriate in the Hutt City. For example, Kāinga Ora considers that there is opportunity to increase heights between Waterloo Station and the city centre in a corridor approach (including but not limited to between Knights Rd. and Waterloo Rd.); review the

urban environment and zone framework in relation to outcomes of the Riverlink project; and potential for further intensification around some key centres in the valley floor upon a centres hierarchy review.

- 5.10 Nonetheless, Kāinga Ora understands that the Council will be undertaking a full District Plan Review in the near future and this process will provide a more cohesive and comprehensive opportunity to review the centres hierarchy and further opportunities for reviewing the zone framework and built form outcomes.

6. THE DESIRABILITY OF REGIONAL CONSISTENCY

- 6.1 The Kāinga Ora submission on PC56 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:

- (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 Kāinga Ora is generally supportive of the zone framework proposed by PC56, including the application of a High Density Residential Activity Area (“HDRAA”) to give effect to Policy 3(c) of the NPS-UD; the Medium Density Residential Activity Area (“MDRAA”) in the rest of the urban environment; and unlimited heights in the city centre and

Petone Commercial Area, noting Petone has a similar role and function of to the city centre in the district and region.

6.4 While Kāinga Ora considers that the Council has generally applied an appropriate zone framework with regard to the application of the HDRAA AND MDRAA, and consider it be a strong example for application at a regional scale, there are some regional 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.

6.5 The submissions have sought a spatial application of zoning patterns that acknowledge and respond appropriately to walkable catchments, 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.

6.6 If the Kāinga Ora submissions on the various IPI processes are adopted, particularly in relation to the above, then variances in the 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. WALKABLE CATCHMENT AND BUILT FORM PRINCIPLES

- 7.1 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.
- 7.2 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 Hutt City.
- 7.3 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.
- 7.4 The findings of that locally-specific assessment have informed the approach taken to the Kāinga Ora submission on PC56. 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 Hutt City as a Tier 1 local authority, is uniquely subject to the requirements of Policy 3(c) of the NPS-UD, in that there are a high number of rapid transit stops within the valley floor, which has resulted in a large spatial application of a HDRAA;

- (b) It is considered that a blanket ‘do minimum’ approach to building heights within walkable catchments around centres within PC56 does not appropriately respond to the high accessibility of these areas to encourage active transport as a means for meeting residents daily needs. 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
- (c) 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.
- (d) As such, Kāinga Ora considers that additional development capacity and built form within walkable catchments of the city centre and Petone commercial area are appropriate to encourage this outcome. I agree with the evidence of Ms Williams and Mr Rae in this regard.

8. DESIGN GUIDES

- 8.1 Kāinga Ora takes a consistent position on the use and role of design guides within the development process.
- 8.2 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.

- 8.3 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.
- 8.4 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.
- 8.5 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.
- 8.6 It is noted that the design guides currently included in the ODP are out of date, and do not reflect the built form outcomes enabled or anticipated by PC 56 and the NPS-UD, and therefore this further exemplifies the benefit of the design guides sitting outside of the District Plan so they are able to be updated and amended without going through a Schedule 1 process.
- 9. RESIDENTIAL HERITAGE PRECINCT**
- 9.1 Kāinga Ora recognises and supports the protection of heritage from inappropriate subdivision, use, development as an s6 matter of national importance¹³, and has an inherent interest and statutory

¹³ [s6\(f\) of the Resource Management Act 1991](#)

mandate in relation to the stewardship of heritage as an operating principle¹⁴.

- 9.2 Kāinga Ora has been involved in ongoing engagement with the Council on proposed heritage protection that include landholdings and buildings that are owned by Kāinga Ora in Hutt City, and in response to the identification of Kāinga Ora landholdings by the Council, Kāinga Ora engaged DPA Architects to undertake an independent heritage review to assess the heritage values of identified landholdings and buildings.
- 9.3 As consistent with the feedback provided to the Council prior to notification of PC56, Kāinga Ora has relied on the heritage assessment completed by DPA Architects and has sought the exclusion of landholdings based on the assessment of the heritage values by DPA Architects on whether the identified heritage values met the threshold for heritage protection.
- 9.4 In this regard, and in the application of its operating principles, Kāinga Ora supports heritage protection for significant heritage values that meet the threshold for protection, and as such:
- (a) Agree with the evidence of Mr Pearson in that buildings at 2-6 East St., 80 Adelaide St., and 81-89 Adelaide St. (odds) should be excluded from the heritage protection; and
 - (b) Agree with the evidence of Mr Pearson and Ms Williams that heritage protection is more appropriately applied as an overlay in a Heritage Chapter in the District-wide Matters part of the District Plan, and a more restrictive activity status for demolition is required to more appropriately protect heritage values.
- 9.5 Kāinga Ora recognises that the application of an overlay in a Heritage Chapter would be more appropriately dealt with through the planned full District Plan Review.

¹⁴ [s14\(1\)\(j\)\(i\) of the Kāinga Ora – Homes and Communities Act 2019](#)

10. FLOOD HAZARD MAPS

- 10.1 The submission of Kāinga Ora acknowledges and supports the risk-based approach to natural hazards. It also seeks an approach to flood hazard mapping to utilise non-statutory mapping that sits outside the District Plan for flood hazards to guide plan users, with consequential changes to the Plan to reflect this change.
- 10.2 Kāinga Ora seeks nationally, regionally and locally that flood hazard maps sit outside of the District Plan as a dynamic map that is able to be updated with the most recent modelling and information without going through a statutory process. Kāinga Ora considers that this approach provides local authorities with a more dynamic and responsive planning framework to manage flood risks, in both:
- (a) Providing development where flood hazards have been reduced (for example, due to infrastructure upgrades such as the Riverlink project, or changes in landform from earthworks or flood events which may change the location of flood hazards); and
 - (b) Managing or avoiding development where flood hazards have increased (for example, due to new and updated modelling or increased flood hazards due to climate change, or changes to the landform from flood events which may change the location of flood hazards).
- 10.3 Ultimately, by the time stormwater mitigation works such as Riverlink is concluded or climate events that change the extent and/or location of flood hazards, the District Plan maps would no longer depict accurately the flood risks in that area. However, as proposed by the Council, the notified rules of the natural hazard section will continue to apply to the site when in fact the overland flow path and any associated flood hazard ponding (inundation) no longer would actually exist on the properties identified in the planning maps.
- 10.4 There is unnecessary cost, time and resources expended undertaking numerous plan changes under a Schedule 1 process of the RMA to

amend planning maps in the District Plan in relation to changing flood hazards. This also will impact the resource consenting process when Council is processing resource consents - the applicant and the Council processing planner will still need to do an assessment and show evidence that the flood hazards no longer apply.

10.5 Kāinga Ora recognizes the traditional approach to flood hazards is to include the mapping in the District Plan, but this no longer considered to be a best-practice approach. A range of approaches have been taken in the national context, and the trend is moving away from the inclusion of flood hazard maps (spatial overlays) in a plan. Auckland Council, for example, has in the Auckland Unitary Plan taken the approach Kāinga Ora is suggesting and recently Tauranga City Council has taken a similar approach in its City Plan.

10.6 To avoid doubt, Kāinga Ora considers it critical and necessary to manage development, use and subdivision in flood hazard areas, and recognises the heightened importance of managing the risk of flood hazards due to recent flood events in Aotearoa. It is in this regard that Kāinga Ora considers it to be even more critical to manage development in flood hazard areas through the use of dynamic mapping combined with an appropriate planning framework within the District Plan that provides the Council with the discretion to manage development in flood hazard areas. This provides for the identification and mapping of flood hazards with the most up to date information and modelling, and a planning framework that assists the Council to ensure that flood hazards are avoided, managed or remedied to reduce or not increase the risk to life and property.

11. CONCLUSION

11.1 Through its submissions on the PC56, 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.

- 11.2 Kāinga Ora is generally supportive of the zone principles that have been proposed by the Council, but considers that if the Kāinga Ora submission on PC56 is adopted, then the constraints applied by the zoning and provisions of PC56 would be reduced. It would provide a development capacity for delivery of significant additional public housing, affordable housing, homes for first-home buyers, in the most appropriate locations to support a well-functioning urban environment.

GURVINDERPAL SINGH

29 March 2023