

Summary Submissions for Bellgrove Rangiora Ltd - Stream 10A- FDA

1. An important element of this case is context. In my submission the existing factual context firmly supports the outcomes that Bellgrove seeks.
2. There are three key contextual features:
 - a. The extreme shortage of housing in the district that is driving up house prices
 - b. The IAF Agreements which commit Kainga Ora to pay \$5.7 million to WDC to accelerate the delivery of 1,300 affordable and market homes on the Bellgrove land at Rangiora.
 - i. The Housing Outcomes Agreement explains that 800 houses are to be built on Bellgrove North and 500 houses on Bellgrove South within 9 years between 2023 and 2032 (see Schedule 2 and Schedule 3 of that Agreement **attached**);
 - ii. The IAF Housing Outcomes agreement records that achieving these housing outcomes is of "fundamental importance" to Kainga Ora.
 - c. Bellgrove's commitment to delivery of the housing outcomes required under the IAF Agreements. Work completed to date by Bellgrove
 - i. Bellgrove has already completed (or nearly completed) construction of civil works for Stages 1A-1D;
 - ii. Bellgrove intends to apply for resource consent for an additional 600 lots across Stages 2-5 within the North Block within the next 3-4 months;
 - iii. Bellgrove has signed a Private Development Agreement with the Council regarding development contributions related to housing development on the Bellgrove Land, and
 - iv. Bellgrove intends to utilise the certification process to enable development to 500 lots across the land known as Bellgrove South below Kippenberger Avenue.
3. However the additional housing capacity to be supplied by Bellgrove must be plan-enabled if Bellgrove is to meet its commitments under the IAF Agreements.
4. This is why Bellgrove:
 - a. Bellgrove seeks the proposed alterations to the ODPs for the North and South Rangiora Development Areas.
 - b. Bellgrove supports the certification consent process proposed by the s42A Report inclusive of the refinements promoted in Bellgrove's planning evidence.

- c. It's particularly important the Additional Land is included in the SER-Development Area.
5. The Additional Land contains 4ha that will provide approximately 57 housing units. This is a substantial amount of housing that cannot realistically be provided elsewhere within the Bellgrove Land. Stage 1 is already built out. Stages 2-5 will soon be subject to resource consent application. Therefore the 57 housing units can only be located within Bellgrove South which is intended to supply 500 houses under the IAF Housing Agreement.
 6. However it's not realistic to expect that Bellgrove can include an additional 57 lots within that part of Bellgrove South that is located within the SER DA. This would mean that an area assumed to supply 443 lots will need to supply the entire 500 lots required for Bellgrove South under the IAF Housing Agreement. This would require a substantial increase in lot density and use of building typologies that are uncommon and relatively, if not completely, untested in Rangiora.¹
 7. There is an obvious risk that supplying 500 lots within an area considerably smaller than contemplated by the IAF Agreement cannot be achieved.
 8. This is a key reason why Bellgrove's case promotes inclusion of the Additional Land within the SER-Development Area.
 9. In my view there are available and sound legal and planning pathways to achieve this outcome that are discussed in my written submissions and the evidence of Ms Ruske-Anderson.

¹ For example duplex, townhouse, multi-unit two-storey developments

Schedule 2: Housing Development Milestones

The Housing Development Milestones to be achieved by the Developer are set out in the table below. References in the table below to “Housing Development” means the dwellings that the Developer is responsible for under this Agreement, as set out in **Item 5 of Part 1**.

BELGROVE Rangiora - STAGES 1A-D (North Block)				
	Phase	Housing Development Milestone	Dwellings Completed	Milestone Date
1.	Pre-Feasibility	Confirmation from the Developer to Kāinga Ora that the pre-feasibility activities for the Housing Development are completed, including: <ul style="list-style-type: none"> • identification of the Housing Development concept; • scenario testing of the Housing Development concept; and • initiation of feasibility inputs commenced. 	N/A	Completed
2.	Feasibility / Concept Plan	Confirmation from the Developer to Kāinga Ora that the feasibility activities for the Housing Development are completed, including: <ul style="list-style-type: none"> • analysis of Housing Development opportunity completed; • commitment to deliver Housing Development; and • high level cost estimate and net funding identified. 	N/A	Completed
3.	Planning / Master Planning	Confirmation from the Developer to Kāinga Ora that the planning / masterplanning work activities for the Housing Development are completed, including: <ul style="list-style-type: none"> • masterplan completed; • lodgement and approval of district plan changes (if any); • refined feasibility of Housing Development (based on completed masterplan); and • business case finalized. 	N/A	Completed

BELLGROVE Rangiora - STAGES 1A-D (North Block)				
	Phase	Housing Development Milestone	Dwellings Completed	Milestone Date
4.	Design / Consenting / Sales Strategy	Confirmation from the Developer to Kāinga Ora that the design / consenting activities for the Housing Development are completed, and a well-defined sales strategy is in place, including: <ul style="list-style-type: none"> resource and subdivision land use consents have been submitted to the relevant decision maker; the commercial arrangements required for the Housing Development are in place; and all necessary land acquisition agreements have been entered into. 	N/A	Completed
5.	Subdivisions completion	Confirmation from the Developer to Kāinga Ora that, in respect of Stages 1A-D: <ul style="list-style-type: none"> resource and subdivision land use consents have been obtained. 	N/A	Completed
		Confirmation from the Developer to Kāinga Ora that, in respect of Stages 1A-D: <ul style="list-style-type: none"> it has sold the relevant sites / land to a third party or third parties, who have committed to Complete dwellings on the sub-divided land. 	N/A	August 2023
6.	Dwellings Completed	Confirmation from the Developer to Kāinga Ora of the first Dwelling Completed (i.e., code of compliance certificate issued) in relation to the Housing Development by the relevant third party or third parties.	1	December 2023
		Confirmation from the Developer to Kāinga Ora of Dwellings Completed (i.e., code of compliance certificates issued) in relation to Stage 1A by the relevant third party or third parties.	48	June 2024
		Confirmation from the Developer to Kāinga Ora of Dwellings Completed (i.e., code of compliance certificates issued) in relation to Stage 1B by the relevant third party or third parties.	61	March 2025
		Confirmation from the Developer to Kāinga Ora of Dwellings Completed (i.e., code of compliance certificates issued) in relation to Stage 1C by the relevant third party or third parties.	28	August 2025
		Confirmation from the Developer to Kāinga Ora of Dwellings Completed (i.e., code of compliance certificates issued) in relation to Stage 1D by the relevant third party or third parties.	58	March 2026

BELLGROVE Rangiora - STAGES 2-5 (North Block)				
	Phase	Housing Development Milestone	Dwellings Completed	Milestone Date
1.	Pre-Feasibility	Confirmation from the Developer to Kāinga Ora that the pre-feasibility activities for the Housing Development are completed, including: <ul style="list-style-type: none"> • identification of the Housing Development concept; • scenario testing of the Housing Development concept; and • initiation of feasibility inputs commenced. 	N/A	December 2022
2.	Feasibility / Concept Plan	Confirmation from the Developer to Kāinga Ora that the feasibility activities for the Housing Development are completed, including: <ul style="list-style-type: none"> • analysis of Housing Development opportunity completed; • commitment to deliver Housing Development; and • high level cost estimate and net funding identified. 	N/A	December 2022
3.	Planning / Master Planning	Confirmation from the Developer to Kāinga Ora that the planning / masterplanning work activities for the Housing Development are completed, including: <ul style="list-style-type: none"> • masterplan completed; • lodgement and approval of district plan changes (if any); • refined feasibility of Housing Development (based on completed masterplan); and • business case finalized. 	N/A	September 2023
4.	Design / Consenting / Sales Strategy	Confirmation from the Developer to Kāinga Ora that the design / consenting activities for the Housing Development are completed, and a well-defined sales strategy is in place, including: <ul style="list-style-type: none"> • resource and subdivision land use consents have been submitted to the relevant decision maker; • the commercial arrangements required for the Housing Development are in place; and • all necessary land acquisition agreements have been entered into. 	N/A	September 2023

BELLGROVE Rangiora - STAGES 2-5 (North Block)				
	Phase	Housing Development Milestone	Dwellings Completed	Milestone Date
5.	Subdivisions completion	Confirmation from the Developer to Kāinga Ora that, in respect of Stages 2-5: <ul style="list-style-type: none"> resource and subdivision land use consents have been obtained. 	N/A	September 2023
		Confirmation from the Developer to Kāinga Ora that, in respect of Stages 2-5: <ul style="list-style-type: none"> it has sold the relevant sites / land to a third party or third parties, who have committed to Complete dwellings on the sub-divided land. 	N/A	March 2030
6.	Dwellings Completed	Confirmation from the Developer to Kāinga Ora of the first Dwelling Completed (i.e., code of compliance certificate issued) in relation to the Housing Development by the relevant third party or third parties.	1	June 2025
		Confirmation from the Developer to Kāinga Ora of Dwellings Completed (i.e., code of compliance certificates issued) in relation to Stage 2 by the relevant third party or third parties.	183	March 2027
		Confirmation from the Developer to Kāinga Ora of Dwellings Completed (i.e., code of compliance certificates issued) in relation to Stage 3 by the relevant third party or third parties.	180	March 2028
		Confirmation from the Developer to Kāinga Ora of Dwellings Completed (i.e., code of compliance certificates issued) in relation to Stage 4 by the relevant third party or third parties.	110	March 2029
		Confirmation from the Developer to Kāinga Ora of Dwellings Completed (i.e., code of compliance certificates issued) in relation to Stage 5 by the relevant third party or third parties.	130	March 2030

BELLGROVE Rangiora - STAGES A-D (South Block)				
	Phase	Housing Development Milestone	Dwellings Completed	Milestone Date
1.	Pre-Feasibility	Confirmation from the Developer to Kāinga Ora that the pre-feasibility activities for the Housing Development are completed, including: <ul style="list-style-type: none"> • identification of the Housing Development concept; • scenario testing of the Housing Development concept; and • initiation of feasibility inputs commenced. 	N/A	August 2023
2.	Feasibility / Concept Plan	Confirmation from the Developer to Kāinga Ora that the feasibility activities for the Housing Development are completed, including: <ul style="list-style-type: none"> • analysis of Housing Development opportunity completed; • commitment to deliver Housing Development; and • high level cost estimate and net funding identified. 	N/A	August 2023
3.	Planning / Master Planning	Confirmation from the Developer to Kāinga Ora that the planning / masterplanning work activities for the Housing Development are completed, including: <ul style="list-style-type: none"> • masterplan completed; • lodgement and approval of district plan changes (if any); • refined feasibility of Housing Development (based on completed masterplan); and • business case finalized. 	N/A	December 2023
4.	Design / Consenting / Sales Strategy	Confirmation from the Developer to Kāinga Ora that the design / consenting activities for the Housing Development are completed, and a well-defined sales strategy is in place, including: <ul style="list-style-type: none"> • resource and subdivision land use consents have been submitted to the relevant decision maker; • the commercial arrangements required for the Housing Development are in place; and • all necessary land acquisition agreements have been entered into. 	N/A	June 2024

BELLGROVE Rangiora - STAGES A-D (South Block)				
	Phase	Housing Development Milestone	Dwellings Completed	Milestone Date
5.	Subdivisions completion	Confirmation from the Developer to Kāinga Ora that, in respect of Stages 2-5: <ul style="list-style-type: none"> resource and subdivision land use consents have been obtained. 	N/A	December 2025
		Confirmation from the Developer to Kāinga Ora that, in respect of Stages 2-5: <ul style="list-style-type: none"> it has sold the relevant sites / land to a third party or third parties, who have committed to Complete dwellings on the sub-divided land. 	N/A	December 2029
6.	Dwellings Completed	Confirmation from the Developer to Kāinga Ora of the first Dwelling Completed (i.e., code of compliance certificate issued) in relation to the Housing Development by the relevant third party or third parties.	1	December 2026
		Confirmation from the Developer to Kāinga Ora of Dwellings Completed (i.e., code of compliance certificates issued) in relation to Stage A by the relevant third party or third parties.	74	August 2028
		Confirmation from the Developer to Kāinga Ora of Dwellings Completed (i.e., code of compliance certificates issued) in relation to Stage B by the relevant third party or third parties.	165	June 2029
		Confirmation from the Developer to Kāinga Ora of Dwellings Completed (i.e., code of compliance certificates issued) in relation to Stage C by the relevant third party or third parties.	120	June 2030
		Confirmation from the Developer to Kāinga Ora of Dwellings Completed (i.e., code of compliance certificates issued) in relation to Stage D by the relevant third party or third parties.	140	March 2031

Schedule 3: Dwellings to be Completed in each year

This Schedule 3 sets out the type and total number of dwellings (to be Completed by the Developer in respect of the Housing Development) in each year.

		2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035 onwards	Total
1.	Public housing dwellings	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil
2.	Papakāinga dwellings	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil
3.	Lower-cost dwellings	Nil	12	80	97	94	76	112	100	80	44	15	Nil	Nil	Nil	710
4.	Other dwellings	Nil	13	65	80	76	62	92	82	66	36	18	Nil	Nil	Nil	590
5.	Total	Nil	25	145	177	170	138	204	182	146	80	33	Nil	Nil	Nil	1,300