

**BEFORE INDEPENDENT HEARING COMMISSIONERS  
AT RANGIORA / WAIMAKARIRI**

**I MUA NGĀ KAIKŌMIHANA WHAKAWĀ MOTUHAKE  
RANGIORA / WAIMAKARIRI**

**IN THE MATTER** of the Resource Management Act 1991

**AND**

**IN THE MATTER** of the hearing of submissions and further  
submissions on the **Proposed Waimakariri  
District Plan**

**HEARING TOPIC:** Stream 1

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**STATEMENT OF PRIMARY EVIDENCE OF BRENDON LIGGETT  
ON BEHALF OF KĀINGA ORA – HOMES AND COMMUNITIES**

**CORPORATE**

**1 MAY 2023**

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## 1. EXECUTIVE SUMMARY

1.1 My name is Brendon Scott Liggett. I hold the position of Manager of Development Planning within the Urban Planning and Design Group at Kāinga Ora – Homes and Communities (“**Kāinga Ora**”) and am presenting this evidence on behalf of Kāinga Ora.

1.2 The key points addressed in my evidence are:

- (a) A background to Kāinga Ora and particularly a focus on the Kāinga Ora portfolio within Canterbury and the importance of redevelopment within the portfolio.
- (b) The importance of the Waimakariri District and its growth in the context of the wider urban environment within Greater Christchurch.
- (c) A summary of the Kāinga Ora submissions on the Waimakariri Proposed District Plan (**PDP**) and Variation 1 (**V1**), including the rationale for the relief sought and in particular comments about:
  - i. Primacy of Strategic Directions and their essential role to the formulation and implementation of the PDP.
  - ii. The importance of full enablement of residential capacity through a variety of housing typologies to provide greater housing choice within the district, particularly in or near centre zones and employment opportunities.
  - iii. Amendments to better align with the strategic directions and urban form and development chapters of the PDP to better align with the outcomes required by the National Policy Statement on Urban Development (**NPS-UD**)

and The Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (**HSAA**). Specifically the relationship between urban form and character under the NPS-UD as well providing for long-term development capacity and well-functioning urban environments.

- iv. Reverse Sensitivity objectives and policies with 'avoid' directions need to allow for management or mitigation of effects and case by case assessment, as it could be possible to reduce risk /effects to a level where they are low or acceptable and are in line with the Canterbury Regional Policy Statement.

1.3 It is noted whilst Council considers PDP, V1 and V2 exclusively, Kāinga Ora have submitted on all three processes and consider that all three processes are relevant to the final edit of the PDP.

## 2. INTRODUCTION

2.1 My name is Brendon Scott Liggett. I hold the position of Manager Development Planning at Kāinga Ora. I hold a Bachelor of Planning from the University of Auckland. I have held roles in the planning profession for the past 21 years and have been involved in advising on issues regarding the Resource Management Act 1991 ("**RMA**") and District Plans.

2.2 My experience includes four years in various planning roles within local government. For the past 17 years I have been employed by Kāinga Ora (formerly Housing New Zealand).

2.3 I have been providing development planning expertise within Kāinga Ora (as Housing New Zealand) since 2006. 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, including more recently, technical lead and project management of Kāinga Ora submissions to the Proposed Whangārei District Plan, Proposed New Plymouth District Plan, Christchurch Plan Review and the Proposed Waikato District Plan and submissions on Plan Changes implementing the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act (“**HSAA**”) and the National Policy Statement on Urban Development 2020 (“**NPS-UD**”).

2.4 I confirm that I am authorised to give evidence on behalf of Kāinga Ora in respect of hearings on the Proposed Waimakariri District Plan (“**PDP**”), including Variation 1 and Variation 2 to that plan (“**V1**”).

### 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, 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 policy.
- 3.2 The Kāinga Ora - Homes and Communities Act 2019 (“**the Kāinga Ora Act**”) sets out the functions of Kāinga Ora in relation to housing and urban development. Under the Crown Entities Act 2004, Kāinga Ora is listed as a Crown agent as is required to give effect to Government policies.
- 3.3 The Government Policy Statement on Housing and Urban Development (“**GPS-HUD**”) was published on September 28, 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.
- 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 objective<sup>1</sup> 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 While Kāinga Ora currently manages a small (relative to other parts of the country) portfolio of dwellings within the Waimakariri District, the Waimakariri District's role as part of Greater Christchurch means it is of importance to Kāinga Ora. Specifically, Kāinga Ora anticipates delivering and reconfiguring housing stock in Greater Christchurch over time, which will allow Kāinga Ora to provide efficient and effective public, affordable and market housing that is aligned with current and future residential demand in the area, and the country as a whole.

3.7 Kāinga Ora tenants are people who face barriers (for a number of reasons) to housing in the wider rental and housing market. In general terms, housing supply issues have made housing less affordable and as such there is an increased demand for public housing.

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<sup>1</sup> Section 12, Kāinga Ora Homes and Communities Act 2019

- 3.8 Over the past decade the demand for public housing has changed markedly from 2-3 bedroom houses, to single unit housing for the elderly and 4-5 bedroom houses for larger families. This demand contrasts with the existing housing portfolio of which a significant proportion comprises 2-3 bedroom houses on larger lots.
- 3.9 The focus of Kāinga Ora in recent times has been to provide public housing that matches the requirements of those most in need. To achieve this, it has largely focused on redeveloping its existing landholdings. Kāinga Ora will continue this approach of redeveloping existing sites by using them more efficiently and effectively, so as to improve the quality and quantity of public and affordable housing that is available.
- 3.10 In addition, Kāinga Ora will play a greater role in urban development more generally. The legislative functions of Kāinga Ora illustrate this broadened mandate and outline two key roles of Kāinga Ora in that regard<sup>2</sup>:
- (a) initiating, facilitating and/or undertaking development not just for itself, but in partnership with or on behalf of others; and
  - (b) providing a leadership or coordination role more generally.
- 3.11 The Urban Development Act 2020 (“**UDA**”) also affords Kāinga Ora additional statutory obligations and powers to undertake urban development functions, including facilitating the delivery of complex and strategically important urban development projects throughout New Zealand. As such, the UDA provides Kāinga Ora with a toolkit of powers and a new, streamlined process to enable complex, transformational development in the country’s urban areas. The UDA does not negate, however, the need for Kāinga Ora to continue to be actively involved in plan-making throughout the country. This new

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<sup>2</sup> Sections 12(f)-(g) of the Kāinga Ora Act 2019.

statutory mandate regarding urban development means that involvement in plan development for urban areas becomes even more critical.

- 3.12 In that regard, Kāinga Ora is to play a pivotal role in delivering on the government's plans for reform of the housing sector, by facilitating a step change in the housing crisis. Kāinga Ora is consequently tasked by statute to provide whānau and families with world class public housing, as well as to partner and undertake urban development of all sizes to deliver homes where needed.
- 3.13 As such, Kāinga Ora has taken on the additional statutory role of facilitating sustainable, inclusive and thriving communities that provide people with a mix of good quality, affordable housing choices and access to transport links, facilities and services, as well as to green spaces. In addition, Ministerial direction provided to Kāinga Ora requires it to build partnerships and collaborate with others in order to define and deliver on housing and urban development opportunities. This will include working with private developers, iwi, Māori landowners and community housing providers to enable and catalyse the delivery of outcomes, through partnerships and the use of new powers to leverage private, public and third sector capital and capacity. Engaging and partnering with local government will also be critical to achieving Kāinga Ora objectives.
- 3.14 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.



#### **4. SCOPE OF EVIDENCE**

- 4.1 The focus of the evidence being presented at this hearing relates to the Strategic Directions Chapter of the PDP and V1. In particular ensuring the objectives and policies related to Urban Form and Development are consistent with the direction of the NPS-UD and HSAA.
- 4.2 It is noted whilst Council considers PDP, V1 and V2 exclusively, Kāinga Ora have submitted on all three processes and consider that all three processes are relevant to the final edit of the PDP.

#### **5. THE KĀINGA ORA HOUSING PORTFOLIO**

- 5.1 Kāinga Ora is managing a portfolio of approximately 7,500 properties across the Canterbury region, with 76% of the portfolio being two and three bedroom dwellings.<sup>3</sup>
- 5.2 At this same time, there are approximately 2,000 applicants waiting for a home within the Canterbury region, with 60% of this waitlist wanting a one-bedroom dwelling.<sup>4</sup> There has been a 13% increase<sup>5</sup> on the waitlist from 2020 across the three districts (Christchurch, Waimakariri and Selwyn).<sup>6</sup>
- 5.3 From these statistics, it is clear that Kāinga Ora needs to ensure that there is provision in the region to provide for a variety of housing types and sizes to meet demand. For Kāinga Ora, building and redeveloping the portfolio to satisfy changing and growing needs within the Canterbury Region is important.

#### **6. THE IMPORTANCE AND BENEFITS OF PORTFOLIO RECONFIGURATION**

- 6.1 In response to the trends and demands relating to the public housing waitlist and the Kāinga Ora portfolio, identified through

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<sup>3</sup> [Managed-Stock-TLA-December-2022.xlsx \(live.com\)](#)

<sup>4</sup> [housing-register-december-2022.xlsx \(live.com\)](#)

<sup>5</sup> [housing-register-december-2022.xlsx \(live.com\)](#) and [housing-register-december-2020.xlsx \(live.com\)](#)

<sup>6</sup> [housing-register-december-2022.xlsx \(live.com\)](#) and [housing-register-december-2020.xlsx \(live.com\)](#)

this evidence, it is clear that reconfiguring the portfolio is not just a 'nice-to-have' for Kāinga Ora. It is a vital mechanism to unlock the potential of the land within the portfolio and provide sufficient, decent affordable housing that will support the Country's growth, and meet the current and future needs of those people most in need of housing assistance.

- 6.1 When redeveloping its portfolio, Kāinga Ora looks to make better use of land that has reasonable access to public transport; commercial centres; community services and facilities (such as public open space, educational facilities, or other social infrastructure); or areas of employment.
- 6.2 Redevelopment of existing brownfield land, especially in high demand locations, will enable the replenishment of existing housing stock and assist in appropriately meeting current and future social housing demand by:
  - (a) making more effective use of Kāinga Ora land;
  - (b) designing houses that integrate with existing communities; and
  - (c) reconfiguring the portfolio to meet the needs of families now and into the future. Traditional state homes of 2 or 3 bedrooms built 50+ years ago on larger sections no longer meet the needs of today's families. Nationwide, as at December 2022, the most common household composition requiring social housing is now single person households (48%). This is followed closely by single parent households with one or more children (35%)<sup>7</sup>. As discussed in section 5 of this evidence, the nationwide changes in demand profile is also evident in Canterbury.
- 6.3 As such, Kāinga Ora is focussed on reconfiguring its portfolio to meet the needs of today's families and better match current demand, which has changed since the 1950s and 60s when a

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<sup>7</sup> MSD Housing register by applicant demographics, December 2022

large portion of its housing stock was built. Over time the reconfiguration of the portfolio will enable improvements in the form, function and quality of the housing within Kāinga Ora portfolio. In managing the reconfiguration, Kāinga Ora acknowledges that changes to the built form will be necessary.

## **7. THE KĀINGA ORA SUBMISSION**

- 7.1 Kāinga Ora generally supports that the PDP, and V1 as notified, have the potential to reduce regulatory constraints and increase housing supply as required through both the HSAA and the NPS-UD.
- 7.2 The Kāinga Ora submission to the PDP and V1 intent is to ensure the delivery of a planning framework across the Canterbury region 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.
- 7.3 While Kāinga Ora currently manages a small (relative to other parts of the country) portfolio of dwellings within the Waimakariri District, the Waimakariri District's role as part of Greater Christchurch means it is of importance to Kāinga Ora. Specifically, Kāinga Ora anticipates delivering and reconfiguring housing stock in Greater Christchurch over time, which will allow Kāinga Ora to provide efficient and effective public, affordable and market housing that is aligned with current and future residential demand in the area, and the country as a whole.
- 7.4 The submission notes that whilst Kāinga Ora supports the PDP, and V1, the following key themes of the PDP and V1, as notified, compromise the extent to which they enable appropriate development across the Canterbury region:

- (a) The further enablement of housing choice, residential growth and intensification to support the social and economic demands for the district.
- (b) Amendments to better align with the strategic directions and urban form and development chapters of the PDP to better align with the outcomes required by the NPS-UD and the HSAA. Specifically the relationship between urban form and character under the NPS-UD as well providing for long-term development capacity and well-functioning urban environments.
- (c) The enablement of a variety of housing typologies to provide greater housing choice within the district, particularly in or near centre zones and employment opportunities.
- (d) The strategic direction for the management of natural hazards, and development where there may be a natural hazard risk.

7.5 If the Kāinga Ora submission on the PDP and V1 is adopted, particularly in relation to the above, then the constraints inherent in the respective IPIs in their notified form would be reduced, and the plan changes would enable greater development capacity for additional public and affordable dwellings on Kāinga Ora land and elsewhere.

## **8. WAIMAKARIRI DISTRICT AND THE IMPORTANCE OF PROVIDING FOR LONG-TERM DEVELOPMENT CAPACITY AND WELL-FUNCTIONING URBAN ENVIRONMENTS**

8.1 Waimakariri is an important area within greater Christchurch, particularly the townships of Rangiora and Kaiapoi. Between 2006 and 2018, the population of Waimakariri increased by

38.9 percent, from 42,834<sup>8</sup> to 59,322.<sup>9</sup> The number of households in Waimakariri increased from 15,918 in 2006, to 22,098 in 2018.<sup>10</sup> While the percentage increase for Canterbury was 13.5 percent, and New Zealand as a whole was 15.7 percent over the same period.<sup>11</sup>

- 8.2 Much of this expansion has been through greenfield development, particularly around Rangiora, Kaiapoi, Woodend and Mandeville. This greenfield development is predominantly low density, car orientated subdivision as private sector developers are understandably incentivised to maximise the value of developments by building large, high-value houses to maximise profit. This in turn leaves an increasing number of homeownership aspirants being unable to access their first home. Securing this additional capacity across the board (i.e. not just on Crown owned land, but also across other privately owned land) provides an opportunity to work with the private sector to increase the development of affordable housing across the District.

#### *Primacy of Strategic Directions*

- 8.3 Kāinga Ora considers that the objectives and policies of the Strategic Directions chapter should have primacy or hierarchy over objectives and policies in other plan chapters. As discussed within the planning evidence of Ms Dale<sup>12</sup>:

“The Strategic Directions [sic] are essential to the formulation and implementation of the PDP. Importantly in my view, they are critical to the preparing, changing, interpreting, and implementing the District Plan, and all other objectives and policies in all other chapters of the District Plan are to be read and achieved in a manner consistent with the Strategic Directions.”

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<sup>8</sup> [NZ.Stat \(stats.govt.nz\)](https://stats.govt.nz/)

<sup>9</sup> [NZ.Stat \(stats.govt.nz\)](https://stats.govt.nz/)

<sup>10</sup> [NZ.Stat \(stats.govt.nz\)](https://stats.govt.nz/)

<sup>11</sup> [NZ.Stat \(stats.govt.nz\)](https://stats.govt.nz/)

<sup>12</sup> Paragraph 4.6 of Ms Clare Dale’s Planning Evidence for Hearing Stream 1 on behalf of Kāinga Ora

8.4 Kāinga Ora considers that the Strategic Directions chapter will ensure that the outcomes sought by Waimakariri District Council are implemented across the PDP and provide a focus on well-functioning urban environments and seek to achieve a range of housing typologies, particularly around centres to detract from the traditional means of development seen to date and as mentioned in paragraph 8.2.

8.5 Further, Mr Osborne states within his economic evidence:

The potential risk of not prioritising these in the PDP Strategic Directions and urban form policies is the probable outcome of a more dispersed development pattern (and the associated economic cost / inefficiencies). Having greater certainty around the volume of residential dwellings (and therefore people) within close proximity to the centralised networks represents a significantly better economic outcome for Council, developers, businesses as well as the community themselves.

*Sufficient opportunities for housing and business land*

8.6 The overall direction of the NPS-UD, include the consolidation of land use activities within a compact urban form, focussed within and around centres (and, ideally, also along key transport routes), as well as the provision of sufficient residential capacity to support and efficiently facilitate growth in each district.

8.7 Housing choice and the location of higher density housing in Waimakariri is important because it affects the way the area grows and changes. Increases in the intensity and type of housing available accessible to employment, commercial services and wider public amenities will also need to change to both provide for a wider range of housing choices but also to support the viability of improvement services available to the community. If growth patterns and the distribution in type and location of the supply of housing continues as has been recently, this may have an impact on factors like traffic, supply of infrastructure, and community services, meaning the

townships will fail to thrive sustainably if they remain dominated by private car travel. There will also not be the availability of homes for those seeking more affordable options.

8.8 If there is a good mix of different types of housing available in Waimakariri, including both high-density and medium density housing options, this can create a more balanced and sustainable community.

8.9 As discussed within Mr Osborne's economic evidence<sup>13</sup>:

This feasible (and realisable) capacity plays a fundamental role in the level of competition enabled in the district. While the NPS UD directs the need to provide for sufficient feasible capacity, there are potential affordability benefits that the district can realise through enabling the housing market to a greater extent.

8.10 Kāinga Ora therefore requests that the Strategic Directions chapter includes that there is, at all times, at least sufficient feasible development capacity to meet commercial and industrial development demand over the short term, medium term and the long term.

#### *Planned Urban Form*

8.11 As mentioned in Ms Dale's planning evidence<sup>14</sup>, the NPS-UD focuses on the identification and promotion of the future character/amenity of urban environments, rather than protection and preservation of existing amenity (Objectives 1 and 4).

8.12 Kāinga Ora has requested a number of word changes to align Strategic Directions with NPS-UD terms and intent, particularly to reflect the recognition that urban environments including

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<sup>13</sup> Paragraph 5.11 of Mr Phillip Osborne's Economic Evidence for Hearing Stream 1 on behalf of Kāinga Ora

<sup>14</sup> Paragraph 1.3(b) of Ms Clare Dale's Planning Evidence for Hearing Stream 1 on behalf of Kāinga Ora

amenity values change over time through planned urban growth and intensification.

- 8.13 As mentioned earlier within this evidence, the Waimakariri District is currently characterised by low density development, mainly of single detached dwellings on larger freehold sites. By omitting acknowledgement and assessment of development to consider the planned urban form, existing character and amenity traits that are uneconomic and restrictive will take precedent rather than recognising that urban environments (including amenity values) change over time through planned urban growth and intensification which enables a range and mix of housing typologies.

*Reverse Sensitivity Objectives*

- 8.14 Kāinga Ora acknowledges that reverse sensitivity wording within the PDP should be consistent with the Canterbury Regional Policy Statement (**CRPS**) at a strategic level. Kāinga Ora consider that reverse sensitivity effects on infrastructure and the Heavy Industrial Zone/Activities should be considered on a case by case basis as directed by the CRPS, noting that adverse effects of infrastructure and heavy industry themselves should also be avoided, remedied and mitigated at the source. Therefore, the term 'avoid' within the specific urban form objectives and policies should be replaced with a 'manage' regime as is promoted within the language of the policy of CRPS.
- 8.15 It is also noted that consistent with its submission on the PDP, Kāinga Ora opposes the airport noise contour provisions because of its potential impact on meeting the objectives of the NPS-UD. Kāinga Ora will be addressing this relief further in the hearing process for Variation 1.



## **9. CONCLUSION**

- 9.1 From the perspective of Kāinga Ora, the PDP and V1 have the potential to reduce regulatory constraints and increase housing supply. If the Kāinga Ora submission on the PDP is adopted, then the constraints applied by the zoning and provisions of the Plan in its notified form would be reduced, and would provide development capacity for delivery of significant additional public housing, affordable housing, homes for first-home buyers, and market housing on Kāinga Ora land, as well as the delivery of significant market capacity across the District. Strong guidance is required from the Strategic Directions of the PDP to enable such a change and to reiterate the importance of these issues in the District.
- 9.2 The amendments sought by Kāinga Ora will enable the delivery in a wider range of locations in the region of a range of housing typologies that are otherwise not currently provided for across the Canterbury region, specifically in the Waimakariri District.
- 9.3 Through its submissions on the PDP and Variation 1, Kāinga Ora is seeking to assist the Waimakariri District in achieving 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 HSAA and the NPS-UD.



**Brendon Scott Liggett**

**1 May 2023**