



## 1. INTRODUCTION

- 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**).
- 1.2 I refer to the evidence I provided in Hearing Stream 3, which set out my experience and qualifications.
- 1.3 This evidence provides context and rationale for Kāinga Ora's submissions in relation to matters addressed in Hearing Stream 4 – Urban Development. This includes:
- (a) Discussion of the establishment of Kāinga Ora, its functions and objectives;
  - (b) An overview of the Kāinga Ora property portfolio both nationwide and within the Wellington region;
  - (c) A summary of Kāinga Ora's position on the most appropriate approach to the centres hierarchy within this Regional Policy Statement.

## 2. BACKGROUND TO KĀINGA ORA

- 2.1 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.
- 2.2 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.
- 2.3 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.

2.4 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.

2.5 The statutory objective of Kāinga Ora requires it to contribute to sustainable, inclusive, and thriving communities through the promotion of a high quality urban form that:<sup>1</sup>

- (a) provide people with good quality, affordable housing choices that meet diverse needs;
- (b) support good access to jobs, amenities and services; and

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<sup>1</sup> Kāinga Ora-Homes and Communities Act 2019, s 12.

- (c) otherwise sustain or enhance the overall economic, social, environmental and cultural well-being of current and future generations.

2.6 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.

2.7 In its 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.

### 3. OVERVIEW OF THE KĀINGA ORA PROPERTY PORTFOLIO

3.1 Kāinga Ora is the largest residential landlord in New Zealand, providing public housing<sup>2</sup> to more than 186,000 people<sup>3</sup> who face barriers (for a number of reasons) to housing in the wider rental and housing market.

3.2 To this end:

- (a) Kāinga Ora owns or manages more than 70,000 properties<sup>4</sup> throughout New Zealand, including about 3,700 properties for community groups that provide housing services.<sup>5</sup>
- (b) Kāinga Ora has public housing in locations spread throughout the Greater Wellington region, managing a portfolio of approximately 9,600 properties (being 12% of the national

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<sup>2</sup> Public housing is an umbrella terms for state housing and community housing.  
<sup>3</sup> Kāinga Ora – Homes and Communities Annual Report 2022.

<sup>4</sup> Managed stock report, as at 30 June 2023 (report published on 4 September 2023), Kāinga Ora Homes and Communities: <https://kaingaora.govt.nz/publications/oia-and-proactive-releases/housing-statistics/>

<sup>5</sup> Ibid.

portfolio). A majority of these properties are located in Lower Hutt, Porirua and Wellington City.<sup>6</sup>

- (c) Kāinga Ora has approximately 24,700 applicants (based on household) waiting for a house on the public housing waitlist across Aotearoa, with just over 11% of the national waitlist seeking a home in the Wellington Region (2,800 applicants).<sup>7</sup>
- (a) Kāinga Ora is undertaking one of the largest housing delivery programmes, with an additional 6,000 new public homes (including 2000 transitional houses) planned to be delivered and added to the Kāinga Ora housing portfolio by June 2024<sup>8</sup> and a continued demand to create more homes.
- (b) In the Wellington region, the focus is to deliver 860 new public and transitional houses by 2024 – focused on delivery in the Wellington City, Porirua and Hutt Valley areas.<sup>9</sup> This is 11% of the delivery programme, and only meets a third of the applicants on the public housing waitlist needing a home in the Wellington region.

3.3 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 has been an increased demand for public housing, and it continues to grow.

3.4 This is particularly so in the Wellington region, which has seen a marked increase by percentage in the Housing Register compared to June 2017 (330% increase or 1,990 applicants (from 810 to 2,800).

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<sup>6</sup> Ibid.

<sup>7</sup> The Housing Register, as at 30 June 2023, Ministry of Social Development.  
<https://www.msd.govt.nz/about-msd-and-our-work/publications-resources/statistics/housing/housing-register.html#LatestresultsJune20231>

<sup>8</sup> Ministry of Housing and Urban Development, Public Housing Plan 2021-2024.  
<https://www.hud.govt.nz/news/public-housing-plan-2021-2024/>

<sup>9</sup> Ibid.

- 3.5 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 large 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.
  - (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.
  - (d) In the Wellington region, the demand for 1 and 2 bedroom homes makes up 80% of the waitlist demand.<sup>10</sup> This is similar to the national waitlist demand for 1 and 2 bedroom housing typologies.

#### **4. KĀINGA ORA SUBMISSIONS ON PLAN CHANGE 1 RELATING TO URBAN DEVELOPMENT**

- 4.1 Kāinga Ora has lodged a comprehensive submission and further submission on PC1. The 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 Amendments Act and the NPS-UD. The intent of the submissions is to ensure the delivery of a planning framework in the Wellington region that contributes to well-functioning urban environments that are sustainable and inclusive which contribute towards thriving communities that provide people with good quality, affordable housing choices and support access to jobs, amenities and services.

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<sup>10</sup> Ministry of Social Development, Housing Register as at June 2023.

- 4.2 Kāinga Ora has also submitted on all proposed plan changes, plan reviews and plan variations giving effect to the NPS-UD and Amendment Act across the Wellington Region, with an interest in establishing a regionally consistent planning framework that responds to regional growth and the relationships between the urban environments within the Wellington Region, and the shared regional resource management issues.
- 4.3 Nationally, one of the strategic goals of Kāinga Ora through submissions on the various IPI processes has been to ensure that local authorities implement the NPS-UD to the fullest extent. Kāinga Ora is concerned to ensure that local authorities do not undermine the step-change intended by the NPS-UD and the Amendment Act by protecting the status quo and retaining as much as they can of the existing rule framework to reduce the application of the Policy 3 directives of the NPS-UD and the MDRS set out by the Amendment Act. Kāinga Ora considers that favouring the status quo in this way could defeat the purpose of the NPS-UD and be inconsistent with Policy 6(b).
- 4.4 The Kāinga Ora submission matters related to Hearing Stream 4 – Urban Development in PC1 (as notified) to the RPS sought to ensure that provisions are effective and efficient, are clear and relate to a specific resource management issue and provide consistent and actionable direction to councils to appropriately manage matters which the Greater Wellington Regional Council is seeking to avoid, remedy or mitigate.
- 4.5 Overall, Kāinga Ora is supportive of the approach taken within PC1 particularly in relation to the following topic areas:
- (a) Incorporating the NPS-UD requirements to provide for growth in the region, but most importantly, promoting compact and concentrated urban form and densification in the Region (especially for residential and commercial land uses).
  - (b) Promoting well-functioning and quality urban environments, based around transit-oriented development and connected centres, and a centres hierarchy.

- 4.6 Whilst Kāinga Ora supports PC1 giving effect to the NPS-UD, Kāinga Ora seeks that a defined centres hierarchy is included in line with the National Planning Standards and the NPS-UD. Centres are of course significant to the application of objective 3 and policy 3 of the NPS-UD, and also objective 8. This includes seeking a defined and distinct spatial hierarchy, distinguishing between the residential zones (high and medium density) and enabling heights commensurate with the anticipated future level of commercial activity and community services.

### **The Desirability Of Regional Consistency**

- 4.7 The Kāinga Ora submission on PC1 also seeks to achieve broad consistency to intensification outcomes across the local authorities within the Wellington Region. This consistency is important because the region's housing and employment markets operate in a regional context.
- 4.8 The key theme in all of the Kāinga Ora submissions submitted across the Tier 1 local authorities in the Wellington Region, is the extent to which each IPI has appropriately responded to the shifts in national direction represented by the NPS-UD and whether the proposed approach 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.
- 4.9 While there are certainly some areas of commonality and consistency across the plan changes, variations and plan reviews, there are many divergences also. This includes:
- (a) Variation in the residential zoning framework include classification and application of various residential zones;
  - (b) Centres Hierarchy, and identification / classification of different centres and their surrounding zones or residential built form standards;



- (c) Application of MDRS standards within residential zones, and the need for additional or new qualifying matters in some City/Districts to manage intensification; and
- (d) The application of the walkable catchment for high and medium density development.

All of these are relevant in the RPS-context and for PC1.

- 4.10 Within and across the Tier 1 local authorities in Wellington and greater Wellington region, Kāinga Ora has sought an increased application of the Medium and High Density Residential Zones (MDZ and HDZ) as well as increased heights in the centre zones to facilitate the creation of well-functioning urban environments and enable the delivery of a variety of homes to meet the needs of all people living in Wellington region.
- 4.11 There is a high demand for housing in the Wellington region, and continued need for increased supply of homes in locations that connect well to jobs, education, transport and amenities. In order for this demand to be met, there is a strong need to build up, rather than out. Intensification, when done well, can bring a range of benefits, including increased investment in infrastructure, improved local amenities, additional green spaces and landscaping, safer environments and a stronger sense of community.
- 4.12 The Regional Policy Statement therefore needs to set the appropriate provisions and directives for local authorities to enable development in accordance with the NPS-UD.

### **Walkable Catchments**

- 4.13 As discussed above, Kāinga Ora has an inherent interest in urban development outcomes in the Wellington region, and in doing so, established a Kāinga Ora principle-based approach to walkable catchments and intensification around centres and rapid transit stops in response to the NPS-UD and the Amendments Act.

- 4.14 It is the view of Kāinga Ora, that a minimum and maximum walkable distance should be captured in the definition of the walkable catchment. This will allow for the application of zones (and high and medium density developments) to be responsive to the local and regional context and supported by appropriate planning provisions.

### **Hierarchy Of Centres**

- 4.15 Kāinga Ora has an interest in the application of planning principles and frameworks by councils, including the appropriate application of a centres hierarchy to align with the National Planning Standards and to provide greater clarity to plan users and communities on the role and function of centres within the region.
- 4.16 Kāinga Ora considers the notified PC1 framework does not correctly identify a centres hierarchy and as a result fails to enable development at a scale that responds to the form, role and function of the Metropolitan and Town centres in particular.
- 4.17 Within the Wellington region, Kāinga Ora considers more robust identification and hierarchy of centres is required in order to identify centres which provide more employment opportunities, amenities and services so as to ensure that an appropriate and proportionate amount of housing supply is enabled around those centres, having regard to future role and function more than current usage.
- 4.18 Specifically, Kāinga Ora considers that Petone meets the definition of a Metropolitan Centre as outlined in the National Planning Standards, and that Newtown, **Miramar**, Tawa, **Naenae**, **Waterloo**, **Mana** and **Paraparaumu Beach** centres meet the definition for Town Centre and those highlighted in **bold** are emerging centres that should be identified as a Town Centre, given their strategic positioning with the region. The application of this classification reflects the outcomes that Kāinga Ora seeks to achieve in providing for well-functioning urban environments and its position is informed by independent planning, urban design and economic expertise.

- 4.19 Kāinga Ora considers that a consistent, principled and structured approach to the role and function of centres will result in well-functioning urban environments, and best implements the NPS-UD, by enabling more people to live within and around the centres with a higher level of amenity and services.

## **5. SUMMARY**

- 5.1 Whilst Kāinga Ora have been generally supportive of PC1 as notified, there are a number of provisions that remain to constrain the ability to create and deliver well-functioning urban environments in the Wellington region, as required by the NPS-UD. Kāinga Ora seeks amendments to these specific provisions:

- (a) Policy 30;
- (b) Policy 31;
- (c) Policy 57;
- (d) Policy CC2A; and
- (e) Definition of 'walkable catchment'.

- 5.2 Amendments to these provisions are to ensure that the RPS sets strong, clear directives for the region and a planning framework that will enable and support urban development in the Wellington region and for the local authorities in this region. By adopting the relief sought from Kāinga Ora, the GWRC through the RPS will contribute to and create well-functioning urban environments across the Wellington region that are sustainable and inclusive, contributing towards creating thriving communities that provide people with good quality, affordable housing choices and support access to jobs, amenities and services.

**BRENDON SCOTT LIGGETT**

15 SEPTEMBER 2023