

**From:** [Gurv Singh](#)  
**To:** [Mailroom Mailbox](#)  
**Cc:** [Brendon Liggett](#); [nickr@barker.co.nz](mailto:nickr@barker.co.nz); [Ruth Evans](#)  
**Subject:** Kainga Ora - Homes and Communities submission on Chapter 6 CRPS change  
**Date:** Monday, 15 February 2021 9:26:06 pm  
**Attachments:** [20210215 Kainga Ora - CRPS proposed change - submission.pdf](#)

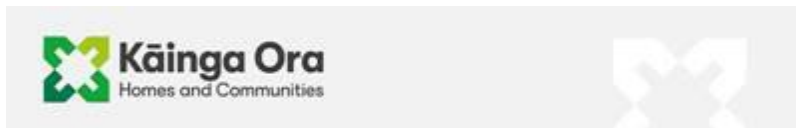
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Kia ora,

Please find **attached** Kāinga Ora – Homes and Communities submission on the [Proposed Change 1](#) to Chapter 6 of the Canterbury Regional Policy Statement, by Environment Canterbury.

Would you please confirm receipt of submission by return email.

Ngā mihi | Kind regards



**Gurv Singh** MNZPI. BPlan(Hons) (He/Him  
Pronouns)

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15 February 2021

Customer Services  
Environment Canterbury  
PO Box 345  
**CHRISTCHURCH 8140**

*Submission by email via:* [mailroom@ecan.govt.nz](mailto:mailroom@ecan.govt.nz)

**RE: Submission on the Proposed Change 1 to Chapter 6 of the Canterbury Regional Policy Statement by Kāinga Ora – Homes and Communities**

Please find **attached** details of the submission by Kāinga Ora – Homes and Communities (“**Kāinga Ora**”) on the Proposed Change to Chapter 6 of the Canterbury Regional Policy Statement (“**CRPS**”) (“**the proposed change**”) by Environment Canterbury (“**ECan**”).

Kāinga Ora currently has multiple landholdings and interests within Greater Christchurch, and has a specific interest in the proposed change in terms of its contribution to housing and urban development within Greater Christchurch. The review of the proposed change has been undertaken in the context of the National Policy Statement on Urban Development 2020 (“**NPS-UD**”) and the wider urban development statutory obligations of Kāinga Ora, particularly its statutory objectives regarding the establishment of sustainable, inclusive, and thriving communities<sup>1</sup>. One of the key operating principles of Kāinga Ora<sup>2</sup>, is ensuring that the housing it develops is appropriately mixed (with public, affordable and market housing) and is of good quality. Kāinga Ora’s submission has been informed by its statutory objectives and functions<sup>3</sup>, as well as a wider perspective which seeks to enable a range of housing typologies to be delivered in appropriate locations and contribute to the provision of quality, affordable housing choices that meet the diverse needs of the community.

Overall, Kāinga Ora is supportive of this targeted proposed change to enable district councils to

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

<sup>2</sup> Section 14 of Kāinga Ora – Homes and Communities Act 2019

<sup>3</sup> Sections 12 & 13 of Kāinga Ora – Homes and Communities Act 2019

rezone land if required to meet medium term housing capacity shortfalls, in the areas already identified through the strategic planning process associated with Our Space 2018-2048. Kāinga Ora notes that there are several actions the council is required to undertake in order to meet the requirements of NPS-UD with regard to ensuring sufficient housing capacity. Kāinga Ora is therefore supportive of the further amendments and review of the CRPS signaled by ECan to respond to other requirements of the NPS-UD and has an interest in participating in these future changes. Kāinga Ora would welcome the opportunity to meet with Ecan to discuss or workshop the approach to responding to the NPS-UD, and any proposed changes.

Please do not hesitate to contact me should you require any further explanation of the above.

Sincerely

A handwritten signature in black ink, appearing to be 'BL', written over a horizontal line.

**Brendon Liggett**  
**Development Planning Manager**  
**Kāinga Ora – Homes and Communities**

**SUBMISSION ON PROPOSED CHANGE 1 TO CHAPTER 6 OF THE CRPS BY  
KĀINGA ORA - HOMES AND COMMUNITIES**

**TO:** Customer Services  
Environment Canterbury  
PO Box 345  
**CHRISTCHURCH 8140**

**KĀINGA ORA - HOMES AND COMMUNITIES** (“**Kāinga Ora**”) at the address for service set out below makes the following submission on the Proposed Change 1 to Chapter 6 of the Canterbury Regional Policy Statement (“**CRPS**”) (“**the proposed change**”).

Kāinga Ora does not consider it can gain an advantage in trade competition through this submission. In any event, Kāinga Ora is directly affected by an effect of the subject matter of the submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

This submission letter provides an overview of the matters of interest to Kāinga Ora with **Attachments 1** providing the substantive detail of submission matters.

**Background to Kāinga Ora and its Submission**

1. Kāinga Ora was established in 2019 as a Crown Entity established under the Kāinga Ora - Home 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 listed as a Crown Entity and is required to give effect to Government policies.
2. Kāinga Ora is now the Government’s delivery entity 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 co-ordinating urban development projects.
3. Kāinga Ora’s statutory objective requires it to contribute to sustainable, inclusive, and thriving communities 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.
4. Kāinga Ora owns or manages approximately 63,800 properties throughout New Zealand comprising of rental properties, community group and transitional housing. Within Greater Christchurch, Kāinga Ora manages a large portfolio of dwellings. Kāinga Ora will look to deliver (and reconfigure) 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.
5. In addition to its role as a public housing provider, landowner, landlord, rate payer and developer of residential housing, Kāinga Ora plays a greater role in urban development more generally. The legislative functions of Kāinga Ora<sup>4</sup> illustrate this broadened mandate and outline two key roles of Kāinga Ora in that regard:
- (a) initiating, facilitating and/or undertaking development not just for itself, but in partnership or on behalf of others; and
  - (b) providing a leadership or coordination role more generally.
6. Notably, Kāinga Ora's statutory functions 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.
7. Kāinga Ora is interested in all issues that may affect the supply and affordability of housing and has a shared interest in the community as a key stakeholder, alongside local authorities. These interests include:
- (a) Minimising regulatory barriers that constrain the ability to deliver housing development;
  - (b) The provision of public housing to persons who are unable to be sustainably housed in private sector accommodation;
  - (c) Leading and co-ordinating residential and urban development projects;
  - (d) The provision of services and infrastructure and how this may impact on Kāinga Ora existing housing, planned residential and community development and Community Group Housing ("CGH") providers; and
  - (e) Working with local authorities to ensure that appropriate services and infrastructure are delivered for its developments.

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<sup>4</sup> Section 13 of the Kāinga Ora – Homes and Communities Act 2019

8. Policy decisions made at both central and local government level have impacts on housing affordability. The challenge of providing affordable housing requires close collaboration between central and local government to address planning and governance issues to reduce the cost of construction, land supply constraints, infrastructure provisions and capacity as well as an improved urban environment.
9. Kāinga Ora's supports the intent of the proposed change to enable district councils to zone additional land in the areas identified, if required to meet demand in the medium term. Kāinga Ora's has sought amendments to provisions to improve clarity and readability.

### **Scope of Submission**

10. The submission relates to the proposed change as a whole.

### **The Submission is:**

11. Kāinga Ora supports the proposed change in part, for the reasons set out below and in the attachments.
12. Provided that the relief sought below and attached is granted:
  - (a) The proposed change will be in accordance with the purpose and principles of the Resource Management Act 1991 ("**the Act**"), the NPS-UD, and will be appropriate in terms of section 32 of the Act.
13. In the absence of the relief sought, the proposed change:
  - (a) will not meet statutory obligations under the NPS-UD;
  - (b) is contrary to the sustainable management of natural and physical resources and is otherwise inconsistent with Part 2 of the Act;
  - (c) will in those circumstances impact adversely on the ability of people and communities to provide for their social, economic and cultural wellbeing; and
  - (d) does not provide a framework to enable the delivery of sustainable, inclusive, and thriving communities.
14. In particular, but without limiting the generality of the above:
  - (a) Kāinga Ora supports ECan's proposal to introduce Future Development Areas that can be rezoned by district councils if required to meet a shortfall in housing capacity in the medium term, as this potential shortfall has already been identified by Our Space 2018-2048;
  - (b) Kāinga Ora considers the proposed change provides a partial response to Policy 2 of the NPS-UD that requires councils to provide at least sufficient development capacity to meet expected demand for housing over the short, medium and long term;
  - (c) Kāinga Ora notes that there are several additional pieces of work that the Council is required to complete in order to fully respond to the NPS-UD in relation to capacity, for example, a Housing and Business Development Capacity Assessment, establishing housing bottom lines, ensuring capacity

includes a competitiveness margin over and above expected demand, and developing responsive planning criteria. Kāinga Ora has a specific interest in the future changes and ensuring that they meet the objectives and requirements of the NPS-UD;

- (d) Kāinga Ora seeks amendments to proposed Policy 6.3.12 to assist with interpretation and legibility.
- 15. Kāinga Ora seeks a number of amendments to PDP which are set out in further detail in this submission and in:
  - (a) **Attachment 1** – Table 1: Identifies the specific provisions of the proposed change which Kāinga Ora either supports or seeks amendment to, or opposes.
- 16. Kāinga Ora would welcome the opportunity to engage with Council on future changes to the CRPS required to implement the NPS-UD. Kāinga Ora seeks that additional engagement on the development of these changes, including provisions and spatial maps, occurs on an ongoing basis.
- 17. Kāinga Ora does not consider it can gain an advantage in trade competition through this submission.

**Dated** this 15<sup>th</sup> day of February 2021

**KĀINGA ORA - HOMES AND COMMUNITIES** by



**Brendon Liggett**  
**Development Planning Manager**  
**Urban Development – Delivery**

**ADDRESS FOR SERVICE:**

Attn: Brendon Liggett  
Development Planning Team  
Kāinga Ora – Homes and Communities  
PO Box 74598  
Auckland 1546



Email: [developmentplanning@kaingaora.govt.nz](mailto:developmentplanning@kaingaora.govt.nz)

Copy to:           Barker & Associates  
                      PO Box 1986  
                      Shortland Street  
                      **AUCKLAND 1140**  
                      Attention: Nick Roberts  
                      Email: [nickr@barker.co.nz](mailto:nickr@barker.co.nz)

## Attachment 1

**Please note:** Where a specific provision is not listed then Kāinga Ora are neutral in respect of the proposed provision.

Provision	Position on the provision	Reason for supporting or opposing the provision	Decision requested
<b>CHAPTER 6 – RECOVERY AND REBUILDING OF GREATER CHRISTCHURCH</b>			
<b>Objective 6.2.2 Urban Form and settlement pattern</b>			
6.2.2	Support	Kāinga Ora supports the amendments to the objective to reflect the inclusion of Future Development Areas in the CRPS as notified.	Retain as notified.
<b>Policy 6.3.3 Development in accordance with outline development plans</b>			
6.3.3	Support	Kāinga Ora supports the amendments to the policy to reflect the inclusion of Future Development Areas in the CRPS as notified.	Retain as notified.
<b>6.3.5 Integration of land use and infrastructure</b>			
6.3.5	Support	Kāinga Ora supports the amendments to the policy to reflect the inclusion of new Policy 6.3.12.	Retain as notified.
<b>6.3.9 Rural residential development</b>			
6.3.9	Support	Kāinga Ora supports the amendments to the policy to reflect the inclusion of Future Development Areas in the CRPS as notified.	Retain as notified.
<b>6.3.11 Monitoring and review</b>			
6.3.11	Support	Kāinga Ora supports the amendments to the policy to include references to the NPS-UD	Retain as notified.
<b>Policy 6.3.12 Future Development Areas</b>			
6.3.12(1)	Support in part	Kāinga Ora generally supports the intent of the new policy, but seeks amendments to better reflect the NPS-UD.	<p><i>Note: underlining of the policy as notified has been removed to assist legibility.</i></p> <p><b>6.3.12 Future Development Areas</b></p>

Provision	Position on the provision	Reason for supporting or opposing the provision	Decision requested
		<p>Amendments to clause 1 of the policy are sought to provide an allowance for the housing and business capacity study to be undertaken by a local authority (acknowledging that this is typically done as part of the Greater Christchurch Partnership).</p> <p>Amendments sought.</p>	<p>Enable urban development in the Future Development Areas identified on Map A, in the following circumstances:</p> <ol style="list-style-type: none"> <li>1. It is demonstrated, through monitoring of housing and business development capacity and sufficiency carried out collaboratively by the Greater Christchurch Partnership <u>or the relevant local authority</u>, that there is a need to provide further feasible development capacity through the zoning of additional land in a district plan to address a shortfall in the sufficiency of feasible residential development capacity to meet the medium term targets set out in Table 6.1, Objective 6.2.1a; and...</li> </ol>
6.3.12(2)	Support in part	<p>Kāinga Ora generally supports the intent of the new policy and alignment with the direction of the Minister set out in the streamlined planning process notice.</p> <p>Amendments are sought to remove unnecessary cross references to Objectives 6.2.1 and 6.2.2 and related policies, as Chapter 6 is to be read as a whole and these objectives and policies will apply regardless.</p> <p>Amendments are sought to improve clarity of language in sub-clause (b), noting that the use of 'enable' is consistent with the minister's direction.</p>	<ol style="list-style-type: none"> <li>2. The development would promote the efficient use of urban land and support the pattern of settlement and principles for future urban growth <del>set out in Objectives 6.2.1 and 6.2.2 and related policies</del> including by: <ol style="list-style-type: none"> <li>a. Providing opportunities for higher density living environments, including appropriate mixed use development, and housing choices that meet the needs of people and communities for a range of dwelling types; and</li> <li>b. <u>Supporting Enabling</u> the efficient provision and use of network infrastructure; and...</li> </ol> </li> </ol>

Provision	Position on the provision	Reason for supporting or opposing the provision	Decision requested
6.3.12(3)-(6)	Oppose	<p>Amendments are sought to remove unnecessary cross references to other objectives and policies in Chapter 6, as Chapter 6 is to be read as a whole and these objectives and policies will apply regardless. It is further noted that the plan change proposes amendments to some of the policies referenced in clauses 3-6, which makes it clear that the policies apply to Future Development Areas.</p> <p>With regard to the reference to Policy 6.3.11(5) in clause 5 of the policy, it is noted that Policy 6.3.11(5) has not been amended to refer to Future Development Areas. If the policy cross reference is retained, including a reference to Future Development Areas may assist plan users in understanding that this policy also specifically applies to these areas (similar to amendments to Policy 6.3.3).</p>	<p><del>3. The timing and sequencing of development is appropriately aligned with the provision of infrastructure, in accordance with Objective 6.2.4 and Policies 6.3.4 and 6.3.5; and</del></p> <p><del>4. The development would occur in accordance with an outline development plan and the requirements of Policy 6.3.3; and</del></p> <p><del>5. The circumstances set out in Policy 6.3.11(5) are met; and</del></p> <p><del>6. The effects of natural hazards are avoided or appropriately mitigated in accordance with the objectives and policies set out in Chapter 11.</del></p> <p>If the policy cross references are retained, amend Policy 6.3.11(5) to also refer to Future Development Areas.</p>
<b>MAPPING</b>			
Map A	Support in part	Kāinga Ora supports the amendments to Map A to identify the Future Development Areas. Kāinga Ora considers it is currently unclear whether these areas provide enough land to account for the capacity requirements of the NPS-UD.	In the event that the Future Development Areas do not provide sufficient land for development capacity required the NPS-UD, Kāinga Ora seeks that additional areas are added.

Provision	Position on the provision	Reason for supporting or opposing the provision	Decision requested
<b>DEFINITIONS</b>			
Definitions	Support	Kāinga Ora supports the amendments to the CRPS definitions to include reference to the NPS-UD and reflect the introduction of Future Development Areas to the CRPS.	Retain as notified.