

**BEFORE INDEPENDENT HEARING COMMISSIONERS
AT TASMAN**

**I MUA NGĀ KAIKŌMIHANA WHAKAWĀ MOTUHAKE
KI TE TAI O AORERE**

IN THE MATTER of the Resource Management Act 1991
AND
IN THE MATTER of the hearing of submissions and further
submissions on Proposed Plan Change 80:
Motueka West to the Operative Tasman
Resource Management Plan (PC80)

**STATEMENT OF EVIDENCE OF JOSHUA NEVILLE
ON BEHALF OF KĀINGA ORA – HOMES AND COMMUNITIES**

CORPORATE

1 NOVEMBER 2024

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1. EXECUTIVE SUMMARY

- 1.1. My name is Joshua Neville, I am the Team Leader – Development Planning for the South Island at Kāinga Ora - Homes and Communities (“**Kāinga Ora**”). I am authorised to present this evidence on behalf of Kāinga Ora in support of its primary submission (submitter #4215) on the Tasman District Council’s (“**the Council**” or “**TDC**”) Proposed Plan Change 80: Motueka West (“**PC80**”) to the Tasman Resource Management Plan (“**TRMP**” or “**the Plan**”).
- 1.2. Kāinga Ora made submission points generally in support of PC80 and requested that the extents of the plan change area extend the application of the Motueka West Compact Density Residential Area to include surrounding sites on High Street, Coppins Place and Whakarewa Street. Kāinga Ora made this request to avoid the spot zoning created by PC80, as well as enable Kāinga Ora to benefit from increased intensification options on well-located sites that are owned by Kāinga Ora.
- 1.3. This evidence is split into three parts.
 - (a) Firstly, giving an overview of Kāinga Ora, our portfolio and public housing demand in the national context, and the reason for Kāinga Ora participating in the proposed plan process;
 - (b) Secondly, outlining the support of PC80 to rezone land in Motueka West for urban development; and
 - (c) Finally, specifically addressing the submission of Kāinga Ora that seeks that the spatial extent of PC80 extend to the boundaries of Whakarewa Street, High Street and Coppins Place. Which includes a number of Kāinga Ora owned properties.
- 1.4. The primary focus of this evidence relates to the proposed extents of the zoned area. This includes:
 - (a) Disagreeing with the Section 42a (“**S42a**”) report authors conclusions where they have rejected the Kāinga Ora submission points;

- (b) Requiring 'well-functioning urban environments' as defined in the National Policy Statement on Urban Development ("NPS-UD") be embedded within planning decisions for Tasman District and why this is relevant for PC80. This includes the need to meet Objective 3 of the NPS-UD by enabling more people to live in proximity to centres and other areas with employment opportunities;
- (c) Considering that the TRMP should enable a full variety of housing typologies to be delivered in appropriate locations, that contribute to the provision of quality, affordable housing choices that meet the diverse needs of the community; and
- (d) Finally, address the matters raised regarding infrastructure constraints and coastal hazards, and how these, whilst being relevant to zoning decisions, should not be used to exclude areas suitable for comprehensive development outcomes.

2. INTRODUCTION

- 2.1. My name is Joshua Thomas John Neville. I hold the position of Team Leader – Development Planning for the South Island within the Urban Planning and Design Group at Kāinga Ora. I have held this position since March 2023 and have been working at Kāinga Ora since August 2021.
- 2.2. I have ten years' experience in planning, policy, and urban development, which includes working within local government.
- 2.3. I hold the qualifications of a Bachelor of Science (Geography) and a Master of Science (Geography) from the University of Canterbury.
- 2.4. In my role with Kāinga Ora, I have provided planning advice into, as well as the management of processes relating to:
 - (a) The assessment and identification of redevelopment land within the Kāinga Ora portfolio;
 - (b) Strategic future land-use planning for Kāinga Ora;

- (c) Regulatory planning activities associated with Kāinga Ora residential development projects;
 - (d) Input into regulatory planning activities including plan reviews, plan variations, and plan changes throughout the South Island; and
 - (e) Engagement with local authorities, local communities and other agencies on matters relating to planning policy associated with Kāinga Ora residential development projects.
- 2.5. I was involved in the review of PC80 and preparation of the submission for Kāinga Ora as a submitter on the plan change. I am presenting this corporate evidence in relation to the submission from Kāinga Ora.
- 2.6. I am familiar with the Kāinga Ora corporate intent in respect of the provision of housing within the Tasman District. I am also familiar with the national, regional and district planning documents relevant to PC80.
- 2.7. In preparing this evidence, I have read the Section 32 and Section 42A reports together with the associated appendices prepared by the Council.
- 2.8. I can confirm that I am authorised to give corporate evidence on behalf of Kāinga Ora in respect of PC80.

3. BACKGROUND TO KĀINGA ORA

- 3.1. Kāinga Ora was established in 2019 as a Crown agent (for the purposes of the Crown Entities Act 2004) under the Kāinga Ora – Homes and Communities Act 2019 (“**the Kāinga Ora Act**”). As a Crown agent, Kāinga Ora is required to give effect to Government policy.
- 3.2. Kāinga Ora has two core roles of:
- (a) Delivering social housing and being a responsible landlord as an agent for the Crown; and

- (b) Partnering to lead and facilitate urban development projects of all sizes.
- 3.3. Kāinga Ora is the Government's lead urban developer, responsible for planning, coordinating and undertaking large and small housing development projects to create a diverse mix of social, affordable and market housing.
- 3.4. To deliver the government's housing priorities, Kāinga Ora partners with others, including councils, government agencies, local government, Māori, iwi and hapū, infrastructure providers, private developers and community housing providers.
- 3.5. The statutory objectives¹ of Kāinga Ora require 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 meets diverse needs;
 - (b) Support and 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. OVERVIEW OF THE KĀINGA ORA PUBLIC HOUSING PORTFOLIO AND DEMAND

National Context

- 4.1. Kāinga Ora is the largest tenancy service provider in New Zealand with a total portfolio of over 75,000 homes² and currently provide housing for over 191,000 customers and their whānau in over 70,000 public housing homes across the country. Kāinga Ora also have almost 4,900 supported and community housing homes in the

¹ Section 12, Kāinga Ora Homes and Communities Act 2019

² Kāinga Ora – Homes and Communities Annual Report 2023-24; [Annual-Report-2023-2024.pdf \(kaingaora.govt.nz\)](#), see page 26

portfolio for community groups that provide housing services and transitional housing³.

- 4.2. Kāinga Ora provides these homes to those in need from the Ministry of Social Development Housing Register (“**Housing Register**”), helping to meet the housing needs of people who face barriers to housing in the wider rental and housing market. In recent years, there has been sustained increase in the demand for public housing⁴.
- 4.3. Additionally in recent years, there has been a marked change in the type of housing that is required by those on the housing register, and to a lesser extent by existing Kāinga Ora tenants. There is a need for more universally designed, accessible and adaptable homes for those that have a disability and/or are aging, so they can live well. A demand for more homes that meet the intergenerational living needs of Māori, Pacific Peoples and others. A demand for more homes that reflect and respect tikanga and the different backgrounds, values and culture of different communities in Aotearoa New Zealand. This all is occurring at the same time as an increased demand for smaller, one- and two-bedroom homes for smaller household sizes.
- 4.4. Many existing older Kāinga Ora homes do not match the changing demand for public housing, and a large proportion of the Kāinga Ora housing portfolio is older three-bedroom homes on larger lots. These homes are often too large for smaller households and too small for larger households.
- 4.5. To meet this increased and changing need, Kāinga Ora is making more efficient use of land by replacing many of our older state houses with more, warm and dry homes in areas of high demand. Kāinga Ora has a range of housing initiatives and programmes underway to boost the supply of new public housing. These include housing projects of different sizes and types in New Zealand’s main centres and across the country.

³ Kāinga Ora – Homes and Communities Annual Report 2023-24; [Annual-Report-2023-2024.pdf \(kaingaora.govt.nz\)](#).

⁴ Ministry of Social Development – Housing Register <https://www.msd.govt.nz/about-msd-and-our-work/publications-resources/statistics/housing/housing-register.html>

Tasman District Context

- 4.6. Kāinga Ora currently manages 224 homes in the Tasman District. This has increased by a net amount of 51 homes in the past 5-years from 173 homes in 2018.
- 4.7. Over the same time period, in the last 5 years, the number of households in Tasman District waiting for a home on the housing register increased by about a third, from 99 households requiring a home in 2019, to 153 households requiring a home in 2024⁵. Consistent with national and regional public housing trends, the existing Kāinga Ora portfolio in Tasman District does not meet the increased demand and changing needs of the growing waitlist of households on the housing register.
- 4.8. The existing Tasman District portfolio currently consists of approximately 94% two-or-more bedroom homes, with only approximately 6% of one-bedroom homes. The demand for one-bedroom homes makes up approximately 59% of the total demand for homes on the Housing Register in Tasman District, which requires a response to reconfigure the housing portfolio to increase the supply of one-bedroom homes.
- 4.9. The Tasman District is a priority for Kainga Ora to reconfigure and grow its housing stock. This includes intensification on well-located sites to deliver additional smaller homes to meet the need outlined above.
- 4.10. The existing Kāinga Ora portfolio is spread throughout the Tasman District. Table 1 below shows the distribution in the various Statistical Area Unit 2 (“SA2”):

- 4.11. Table 1: Kāinga Ora lettable unit SA2 distribution in Tasman District

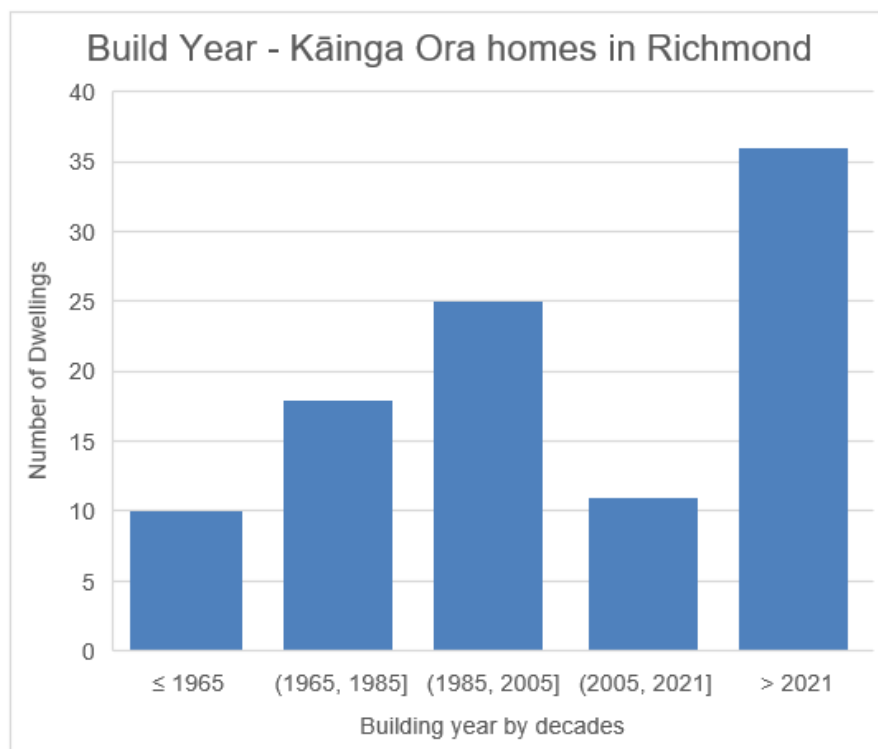
SA 2	Lettable Units
Motueka and surrounds (110)	
Motueka East	51
Motueka North	40

⁵ [Housing Register - Ministry of Social Development \(msd.govt.nz\)](https://www.msd.govt.nz/housing-register/)

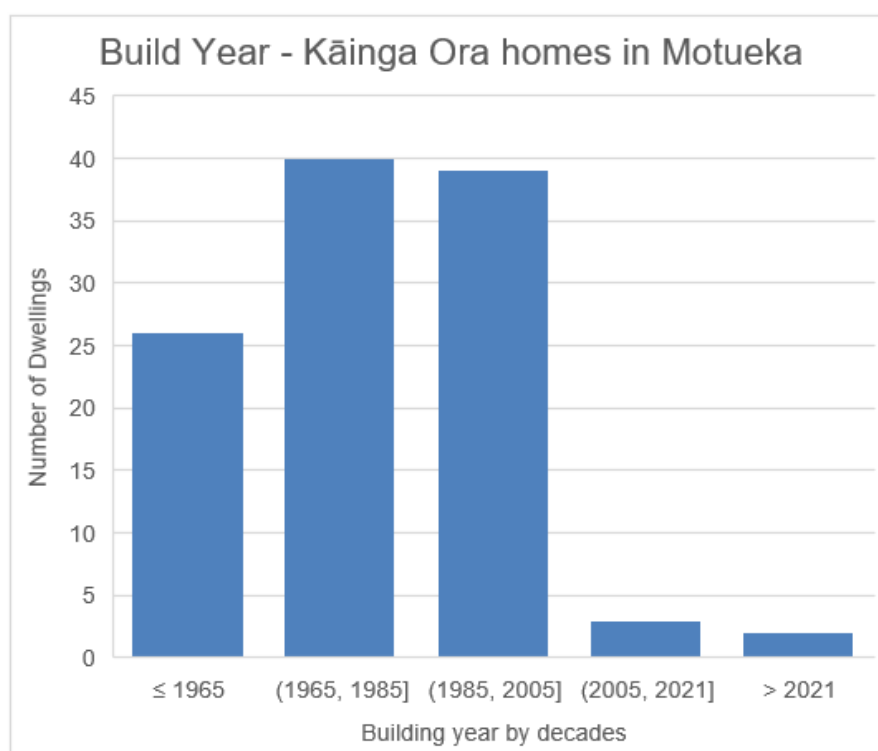
Motueka West	19
Richmond and Surrounds (101)	
Appleby (Tasman District)	1
Richmond West (Tasman District)	16
Richmond South (Tasman District)	6
Ben Cooper Park	9
Fairose	1
Wilkes Park	3
Easby Park	5
Templemore	4
Richmond Central (Tasman District)	56
Other Tasman District (13)	
Tākaka	12
Moutere Hills	1

- 4.12. As shown in Table 1, there are significant clusters of Kāinga Ora homes in both Richmond and Motueka. Both locations are desired by Kāinga Ora customers who seek housing options that are close to services, amenities, jobs, and schools.
- 4.13. This spatial distribution of properties represents a challenge for Kāinga Ora in planning how it will deliver homes and in part, redevelop and renew its portfolio in the future. Firstly, a number of sites are located in areas that are exposed to potential high flood impact risk associated with flooding and coastal inundation. Secondly, many well located homes in Tasman District in both Richmond and Motueka are recently built homes and will not be redeveloped for many years. Chart 1 and 2 below show building age distribution in these locations.

4.14. Chart 1: Kāinga Ora lettable unit building year distribution in Richmond



4.15. Chart 2: Kāinga Ora lettable unit building year distribution in Motueka



- 4.16. To provide for renewed and reconfigured public housing in the Tasman District, Kāinga Ora needs to adopt two approaches:
- (a) The first approach is the acquisition of new homes delivered by construction partners.
 - (b) The second approach is to redevelop its older houses on sites where they are well located with good access to amenities, have a District planning framework that enables efficient use of the land, as well as being located away from significant risks of natural hazards or other constraints.
- 4.17. There are limited options within the existing portfolio available to Kāinga Ora to achieve these outcomes in Tasman District, with few sites suitable for redevelopment, which in turn puts pressure on Kāinga Ora to meet its housing objectives.
- 4.18. Within the context described above, aligning with the principles of the Kāinga Ora Act and giving effect to government policy, Kāinga Ora seeks a planning framework that enables the delivery of more homes and typologies that meets the demand in locations with high accessibility to jobs, amenities and services.

5. THE KĀINGA ORA SUBMISSION AND POSITION

- 5.1. A short summary of the Kāinga Ora submission on PC80, s42A response and current position is attached at **Appendix 1**.
- 5.2. The Kāinga Ora submission is generally supportive of PC80 as notified and primarily sought changes to the zoning extents of the plan change.
- 5.3. The existing TRMP provisions that apply to the sites that Kāinga Ora sought to have included in PC80 unreasonably restrict the ability to develop new and more efficient and appropriate residential development on its landholdings. The existing provisions also limit future residential development by others, which might otherwise be

compatible with national and regional direction under the NPS-UD and the Future Development Strategy ('FDS')⁶.

- 5.4. This position comes from the operational and development needs of Kāinga Ora, and also reflects a wider interest in delivering the outcomes sought by the NPS-UD.
- 5.5. Kāinga Ora is of the view that the Council is seeking a policy and consenting framework that does not align with the broad direction of the NPS-UD and is adopting a narrower approach than envisaged by the FDS, with an emphasis on the avoidance, rather than the management and mitigation of effects associated with intensification and hazard risk on sites.
- 5.6. The approach limits the development potential of landowners, including Kāinga Ora, by not proposing to adequately provide a planning environment that enables appropriate housing choice and supply in a location Kāinga Ora considers to be appropriate for additional housing.

6. SUPPORT OF PC80

- 6.1. As outlined in the Kāinga Ora submission, the submission supports the intent of PC80 and how this will enable housing supply and residential intensification in Motueka. There is an acute need to provide new opportunities in Motueka for housing growth and provide for specific housing choice to those currently underserved in the existing housing market.
- 6.2. The proposed development that PC80 will enable, represents an innovation in housing supply, which is also generally supported. Innovations in the housing system are much needed to resolve housing stress in the Tasman District.
- 6.3. Kāinga Ora also support the enablement and introduction of compact residential development opportunities in Motueka, as this will provide an alternative to the residential development patterns that have traditionally occurred in Motueka, and more broadly within Tasman

⁶ <https://www.tasman.govt.nz/my-council/key-documents/more/future-development-strategy/>

District. Similarly, the Crown has also recognised the importance of enabling homes in Motueka through the funding support provided through the infrastructure acceleration funding provided to enable and unlock housing.

- 6.4. Similarly, Kāinga Ora has been working with the Council to sell land from a portion of a site it owns on Whakarewa Street for road construction of the Manoy Street roundabout to enable transport access to the development site covered by PC80.
- 6.5. If PC80 is made operative and the site and adjacent land zoned as requested by the submission of Kāinga Ora, this will enable the construction of much needed homes, but also demonstrate how different housing typologies can be supplied in the Tasman District.

7. RESPONSE TO THE S42a POSITION

- 7.1. As discussed above, Kāinga Ora sought amendments to the notified PC80 proposal seeking:
 - (a) Changes to the extent of PC80, seeking an extension of the proposed Compact Density Residential Zone, as well as addressing the relationship and need to spatially integrate PC80 with the existing urban environment; and
 - (b) Amendments to the proposed changes to the policy framework to manage development in the district, to have clearer wording as to where intensification would be appropriate in Motueka.
- 7.2. The Kāinga Ora submission points were rejected on the basis that inclusion of additional parcels of land into the PC80 area is not appropriate due to limitations to servicing and natural hazard effects.
- 7.3. Kāinga Ora does not agree with these findings and considers that these sites are appropriate for inclusion in the PC80 area.
- 7.4. As outlined earlier in this evidence, Tasman District is a priority area for Kainga Ora to reconfigure and renew its housing stock. This includes the need for intensification on well-located sites to deliver additional smaller homes to meet the changing needs of customers.

- 7.5. Kāinga Ora has no landholdings within the notified proposed PC80 area but owns 14 homes / 14 sites across a total 0.73 hectares of land adjacent to PC80 on Whakarewa Street, Coppins Place, and High Street. These properties are well located, being close to Motueka centre, with good access to transport, employment opportunities, schools and community and commercial services. Some of these properties are in clusters, presenting an opportunity for intensification and delivery of new public homes that are better suited to the changing needs of Kāinga Ora customers.
- 7.6. Kāinga Ora has explored an intensified redevelopment on one site it owns on High Street with limited success. In preapplication meetings and advice provided by the Council, Kāinga Ora was advised that the densities proposed to achieve the changing needs of Kāinga Ora customers, could result in consent applications facing administrative process burden (including notification) when considered against the operative District Plan. The proposal by Kāinga Ora is aligned with the development density provisions of the proposed PC80 - Residential – Compact Density rules.
- 7.7. Assessment of the existing policy environment in the TRMP by Kāinga Ora has not found the residential objectives, policies and rules to be appropriately supportive of intensification and has identified this as a significant barrier to development.
- 7.8. In alignment with the future development strategy, and also NPS-UD, Kāinga Ora seeks that this area adjacent to PC80 be rezoned from residential to Residential – Compact Density.

Infrastructure Sufficiency

- 7.9. In Ms McKenzie's rejection of several of the Kāinga Ora submission points, she raises a concern with respect to infrastructure capacity:

“The additional residential land (proposed by the submitter) cannot be serviced with wastewater or stormwater infrastructure in the short term and its inclusion in the plan change would hold up development of residential land in the Motueka township - which has a high demand for housing and business land now and in the future.”

Providing housing and development on existing zoned land within Motueka is hardly holding up development, but on the contrary providing for it. Similarly, there are a number of benefits for infrastructure capacity that have not been assessed by Ms Mckenzie in the S42a analysis.

7.10. It is Kāinga Ora experience that Infrastructure capacity issues are regularly raised as to not progress with zoning. Kāinga Ora is of the view that providing for intensification of existing brownfield land and enabling a compact urban form will have positive effects on infrastructure servicing requirements for a town or city⁷. By concentrating growth within existing serviced areas, a compact urban form and associated infrastructure investments can have positive effects such as the following:

- (a) It allows authorities to capitalise on and optimise investment decisions relating to renewal and growth programmes, (i.e.: it provides an opportunity to benefit from programmes relating to the replacement of aging or failing assets).
- (b) By minimising the extent of urban form beyond existing limits, it can reduce adverse impacts on the environment.
- (c) It minimises the total area to be serviced, thereby reducing the long-term costs of infrastructure maintenance.
- (d) It minimises the total linear length of infrastructure required.
- (e) It reduces the carbon footprint of development.
- (f) Redevelopment can reduce water demand through water efficient appliances and plumbing fittings.
- (g) Redevelopment can progressively reduce inflow and infiltration to the wastewater system from private drainage by replacing older earthenware pipes with PVC, freeing up capacity for growth.

⁷ <https://hamilton.govt.nz/property-rates-and-building/district-plan/plan-changes/plan-change-12/>

- (h) It can provide greater security of supply for water infrastructure through duplication and pipe upgrades to service growth.
- (i) It can reduce existing wastewater overflows.
- (j) It can reduce flooding hazards and risks in existing developed areas.
- (k) It can reduce contaminants in runoff from existing serviced areas with improved water quality outcomes.
- (l) It can result in more efficient use of existing infrastructure as some local infrastructure components have spare capacity due to the specification of minimum-sized pipelines. For example, public wastewater pipes typically have a minimum diameter of 150mm. A pipe this size may service only a dozen or so houses but has the potential capacity for up to approximately 250 dwellings.

7.11. By providing a pathway for comprehensive residential redevelopment in the area proposed by Kāinga Ora, as well as providing for the growth enabled by PC80, some if not all of the benefits above may be realised.

7.12. However, without sufficient growth and redevelopment alongside appropriate enabling provisions in the TRMP, the ability to redevelop will be difficult, and there will be pressure to release more Greenfield land for development that overall will have a greater effect on the infrastructure capacity and cost to the Council.

7.13. Similarly, Kāinga Ora believe there is adequate on-site solutions to address any short-term infrastructure capacity concerns, each addressed below.

Water Supply

7.14. In part of the proposed sites addressed in the Kāinga Ora submission, Kāinga Ora has recently invested in improvements to the water supply infrastructure. Kāinga Ora decommissioned a water

bore on a site it owns on Coppins Place, which serviced a number of Kāinga Ora and privately owned homes on Coppins Place, Whakarewa Street and High Street. Kāinga Ora has installed a new 150mm rider water main and an extension loop in Coppins Place. This enabled 17 mains water supply points for Kāinga Ora properties, as well as mains supply for a further 8 privately held properties. In total, 7 ground water bore supply points have been decommissioned in this area. This reduces the costs to supply water, as well as improving resilience and safety of the water supply to these households.

Wastewater

- 7.15. In preapplication advice to Kāinga Ora regarding a redevelopment proposal on High Street, the Council advised that if intensification was to occur, there was the potential for an alternative method of wastewater disposal. This would likely be in the form of on-site storage coupled with off-peak pumping to Council's wastewater system (“**off peak disposal**”). Off peak disposal is a solution that is readily used throughout New Zealand to address peak flow wastewater capacity issues. The Nelson Tasman Land Development Manual (“**NTLDM**”) has provisions for private pump systems, and the Council already has guidance available to users of such a system⁸.

Stormwater

- 7.16. Similarly, in preapplication advice to Kāinga Ora regarding its proposal on High Street, the Council advised that if intensification was to occur, the development would need to either extend the public network to provide connections to the site, or demonstrate adequate on-site disposal is feasible. It is acknowledged that this would need to comply with the TRMP and NTLDM, however this type of site-specific solution is something that is again commonly used in intensified development and soak pits have been demonstrated to be an adequate solution elsewhere in Motueka to dispose of most

⁸ Pressure Wastewater Pumping System (owners and occupiers commissioning manual) <https://www.tasman.govt.nz/%2Fdocument%2Fserve%2FPressure%2520Wastewater%2520Systems%2520-%2520Owner%2520C%2520Occupier%2520and%2520Commissioning%2520Manual.pdf%3FDocID%3D19336&usg=AOvVaw0NDOB5s9lrglvoX1TIE2sZ&opi=89978449>

stormwater. Where there are capacity concerns, the use of detention tanks can resolve issues that are associated with peak flow stormwater capacity constraints. The Council can assess and require such interventions as part of its assessment of resource consent proposals.

- 7.17. The advice that Ms McKenzie has relied on with respect to capacity concerns⁹ also seems to conflict with the Appendix 4 of the S42a report: RM240322 (b):

“A Tasman District Council Development Engineer has reviewed the application and states that he considers it unlikely that there would be a network capacity issue given the discharge to Woodlands Drain flows to the estuary under Old Wharf Road.”

- 7.18. Whilst the area covered by the Kāinga Ora submission drains to a different part of the Woodlands Drain, site specific solutions alongside improvements associated with RM240322 being given effect to would, in the view of Kāinga Ora be sufficient to resolve any capacity concerns in the short term that the Council have identified.

Natural Hazard effects

- 7.19. In the S42a report Ms McKenzie also identified that there is concern with respect to natural hazard effects risk associated with the land proposed by Kāinga Ora to be included in PC80, and she has identified a Coastal Hazard vulnerability. This is based on a scenario of up to 1.89m of sea level rise by 2130 (based on a climate change scenario SSP5-8.5 h+).
- 7.20. As an asset owner and a tenancy manager, Kāinga Ora has both a commercial and social imperative to better understand and take actions to address risk where necessary.
- 7.21. To assist in this process Kāinga Ora has carried out work and commissioned reports to identify and manage risk. Kāinga Ora has

⁹ 5 K. Arnold – Acting Team Leader Infrastructure Planning (Email). Message sent to M. Bengosi (Myaan. Bengosi@tasman.govt.nz). 10 October 2024.

also completed a climate-related disclosure for 2023/24¹⁰. Kāinga Ora is acutely aware of the risk that climate change poses and the need to take action now to reduce this risk. Coastal hazard risk is considered as part of the investment work Kāinga Ora completes when acquiring new land and redeveloping properties it owns.

- 7.22. In Motueka there is a risk exposure for a high proportion of the land that Kāinga Ora owns, particularly those sites east of High Street. For Kāinga Ora to reduce the risk exposure of customers and assets, as well as still providing homes in Motueka, there is a need for community scale risk reduction intervention to occur, or for Kāinga Ora to develop on less at-risk sites.
- 7.23. The risk identified by the Council is based on a 'bathtub' modelling approach. The 'bathtub' approach takes a calculated storm tide level and maps terrain areas that are below this level and would be inundated by the modelled storm event. This modelling approach can either be conservative or unconservative; conservative in inland areas where the water has a long distance to travel over land near the top of the tide, and unconservative in areas where dynamic effects (such as wave runup that is usually neglected in bathtub modelling) are significant. This modelling approach whilst very helpful to communicate community scale risk, it is limited in site specific usefulness. Reporting produced by Tonkin and Taylor elsewhere have identified the limitations and benefits of the bathtub modelling approach¹¹
- 7.24. In general, areas with potential flooding risk of depths that are below 0.3m can be managed through site-specific redevelopment design, whereas over 0.3m in depth site development becomes increasingly more constrained, further interventions needed, and community scale interventions are more likely to be the appropriate solution.
- 7.25. Kāinga Ora has to take a range of considerations into account when making investment decisions including future hazard risk. In some

¹⁰ <https://kaingaora.govt.nz/assets/Publications/Annual-report/Kainga-Ora-Climate-statement-2024.pdf>

¹¹<https://ccc.govt.nz/assets/Documents/The-Council/Plans-Strategies-Policies-Bylaws/Plans/district-plan/Proposed-changes/2022/PC14/Technical-Documents/Section-32-Reports/Part-02/Appendix-6-Part-04-Optimized-v2.pdf>

areas – including Motueka, redevelopment may actually reduce the risk profile to customers and assets. Redevelopment generally occurs on less risk prone land, as well as new construction being at a higher finished floor level. Proposals for the sites that Kāinga Ora has investigated in High Street for redevelopment has included raised finished floor levels to meet the requirements of the building code and ensure asset longevity in future risk scenarios. These benefits would not accrue if the relief sought by Kāinga Ora was not adopted.

- 7.26. Kāinga Ora also notes that in the section 32a report for PC80 at section 4.16 natural hazards were evaluated, and despite a similar risk profile as the area proposed to be included by Kāinga Ora, the S32a position was that

‘The level of risk is minor and effects of this inundation can be mitigated at future development stage through raising of ground levels and / or floor levels to provide mitigation.’

Kāinga Ora agrees with this conclusion in that the risks of potential inundation of the land requested for rezoning is minor and can be further mitigated through redevelopment of the land.

- 7.27. Since PC80 was notified, the Council has also consulted on early engagement for PC81¹², which proposes additional sites on High Street be rezoned to Compact Density or Medium Density Residential Zone, sites MOT1 and MOT2 on interactive maps. Both of these sites are subject to the exact risk identified by Ms McKenzie as reasons why the additional land proposed by Kainga Ora is inappropriate to be included in PC80. It seems very unclear as to the actual position of the Council as to the acceptability or otherwise of the costal hazard risk for the entirety of the PC80 and PC81 areas, and why a consistent approach has not also extended to land proposed by Kāinga Ora to be included in the plan change.

8. Is the Balance Right?

¹² <https://shape.tasman.govt.nz/urban-growth-PC81>

- 8.1. A balance needs to be struck between enabling development and limiting intensification on the based-on infrastructure constraints and hazards. While Kāinga Ora agree that reports indicate both infrastructure capacity issues in Motueka, as well as hazard exposure exist, both are not an uncommon constraints to be addressed and managed when making changes to planning documents, or when Council's undertake assessments for future growth areas.
- 8.2. It is nearly always the case that the planning for growth will generally allow for more development than the existing infrastructure can currently service, or prior to full adaptation decisions having been made. This is especially the case for greenfield areas where very seldom does the infrastructure to service development actually exist when planning decisions to rezone land are made. It is unclear to Kāinga Ora, why the Council has assumed that brownfield and redevelopment planning should be different to how it plans and provides for greenfield development. Providing planning provisions that enable development, is not the same as that development occurring. The impact of growth on infrastructure capacity will always be difficult to predict and there is no certainty as to where and how new housing will develop under any scenario as it is primarily market driven.
- 8.3. It is also the experience of Kainga Ora those inappropriate limitations on the development of existing residentially zoned land to an intensity less than what is provided in other parts of the district is likely to deter redevelopment investment in the area, adversely impacting on the ability for landowners, including Kainga Ora, to renew and improve existing housing stock.
- 8.4. Kāinga Ora opposes the spot zoning of sites – regardless of ownership, on the basis it does not achieve the integrated outcomes that are intended by the NPS-UD, the Act and does not represent an efficient use of resources for the community or the Council.
- 8.5. Kāinga Ora has sought to address this concern in meetings with the Council. In its meeting with the Council on 12 February 2024 Kāinga Ora was advised that Council would not support rezoning as the

Council was seeking a staged FDS intensification rezoning and a plan was being prepared to provide for this approach. It is unknown at this time by Kāinga Ora what the timeline for any such plan changes are.

- 8.6. Kāinga Ora therefore requested that the Council rezone the sites outlined in their submission and shown in the map to align with the remaining PC80, and PC81 zones parameters.

9. Relief Sought

- 9.1. As briefly outlined in **Appendix A**, the S42A report does accept some but not all of the relief sought by Kāinga Ora.
- 9.2. Kāinga Ora seeks the panel adopt its relief proposed by Kāinga Ora.
- 9.3. Specifically, Kāinga Ora seeks:
 - a. That notified land proposed in PC80 is Rezoned to Residential with Compact Density Provisions to encourage medium density housing and enable the development sought on this site; and
 - b. That the zone extent of PC80 is amended as per map in the Kāinga Ora submission with appropriate and consequential amendments for objectives, policies and rules as required.

10. CONCLUSION

- 10.1. Kāinga Ora supports PC80 generally, and that this plan change will enable growth as well as representing an innovation to encourage medium density housing in Motueka.
- 10.2. However, Kāinga Ora also considers that an opportunity was lost when PC80 was notified in that it did not consider how the proposed rezoning could be integrated with the existing environment by appropriately upzoning adjacent land to provide redevelopment opportunities, align with outcomes sought in the FDS, and align with the NPS-UD.

- 10.3. If the requested relief is adopted, this will not only allow Kāinga Ora to adequately renew and improve its public housing provision in Motueka, but it will also provide for development opportunities and aid in the consenting and delivery of housing, including increasing housing choice (typology and size) for the Motueka community.

01 November 2024

Appendix 1: Kāinga Ora submission points with s42A response

Provision	Submission Point	Position	Summary of key reasons	Decision requested	S42A Response	Position following S42A
PC80 in its entirety	4215.01	Support in part	Kāinga Ora considers that PC80 should go further to enable infill intensification in existing urban areas within close proximity to the Motueka town centre and main transport routes. The area that Kāinga Ora seeks to be included in PC80, includes some of the existing urban area identified in the FDS as an intensification area (T-190).	Extend the Motueka West Compact Density Residential Area (MWCDRA) to include additional sites. Ensure than provisions still enable policy support for urban infill and increased density.	<i>Submission point is rejected.</i>	No change from primary submission
Policy 6.9.3.3	4215.02	Support in part	Kāinga Ora is concerned that the amended policy wording could create an unintended ambiguity and potential unnecessary restriction on intensification which was otherwise supported by the policy framework. The concern is that the addition of 'and within the Motueka West Compact Density Residential Areas.', would restrict further residential development in those residential areas south of Whakarewa Street, as these would not be both within walking distance of the Motueka town centres and within the MWCDRA. Under the operative plan, policy 6.9.3 would provide a level of policy support for enabling higher density development in all residential areas between Grey/ Whakarewa Streets, where it was 'within walking distance of the Motueka town centre'. It is also the view of Kāinga Ora, the notified drafting would be inconsistent with the NPSUD as it not only restricts what is already supported through the policy framework regarding development near to town centres, but also seeks a policy outcome which is contradictory to the NPSUD. Kāinga Ora recommends a simplified wording.	Amend Policy 6.9.3.3 as follows: To enable further residential development west of Grey Street and south of Whakarewa Street with opportunities for a higher density of development on sites within walking distance of the Motueka town centre, and including and within the Motueka West Compact Density Residential Areas.	<i>Submission point is rejected.</i>	No change from primary submission
Policy 6.9.30	4215.03	Support in part	This amendment is sought in relation to the concerns raised in the Kāinga Ora submission on Policy 6.9.3.3.	Amend 6.9.30 to read: Urban expansion is provided for within the Motueka West Development Area to the west of	<i>Submission point is rejected.</i>	No change from primary submission

			<p>Kāinga Ora supports the non-notification clauses relating to the MWCDRA.</p>	<p>High Street and urban intensification is provided for in appropriate areas. Identified areas of higher density residential development are provided for within the Motueka West Compact Density Residential Areas to the east of Kerei Street and south of Whakawera Street. These areas provide for compact density development to accommodate a range of housing choice to meet the current and future needs of the community.</p> <p>Non-notification (both public (s95A) and limited (s95B)) of Compact Density Development within the Motueka West Compact Density Residential Area south of Whakarewa Street applies to Restricted Discretionary Activity applications for subdivision and Controlled Activity applications for land use. This responds to the objectives and policies in the Tasman Resource Management Plan which:</p> <ul style="list-style-type: none"> i. Seek efficient use of land and infrastructure, ii. Encourage medium density housing development of a high standard in suitable locations, iii. Seek a range of living opportunities and residential densities. <p>The non-notification provision is used for Compact Density Development in the Motueka West Compact Density Residential Area south of Whakarewa Street because the structure of Compact Density Development rule 17.1.3.3 g) means that Compact Density Development along the external boundaries of the development site must meet the standard permitted activity bulk and location criteria in the Tasman Resource Management Plan unless the land adjoining the specific boundary is being developed as a Compact Density Development. Therefore, any properties outside of the Compact Density Development will not experience a change in terms of the bulk and location of buildings from what could be developed under a permitted activity scenario in the Residential Zone.</p>		
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Appendix 2: Kāinga Ora submission Maps

The following maps set out the amendments sought from Kāinga Ora to PC80.

Proposed changes:

Extension of the Motueka West Compact Density Residential Area is shown as a yellow dash line.

