

1. EXECUTIVE SUMMARY

- 1.1 My name is Joshua Thomas John Neville, I am 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 and further submissions (submitter #229) on the Timaru District Council's (**the Council**) proposed Timaru District Plan (**pTDP**).
- 1.2 Kāinga Ora made submissions and further submission points in relation to the definitions, strategic directions and urban form objectives and policies of the proposed Timaru District Plan (**pTDP**). The Section 42A report for Part 1 - Introduction and General Definitions drafted by Ms Hollier and the Section 42A report for Strategic Directions and Urban Form and Development Chapters drafted by Mr Willis has recommended accepting some but not all the changes requested by Kāinga Ora. Kāinga Ora generally accepts the position now adopted by the Section 42A report authors and recommends the panel adopt their proposed changes.
- 1.3 This evidence is split into two parts, part one giving an overview of the Kāinga Ora portfolio and public housing demand in the national context, and the reason Kāinga Ora is participating in the proposed plan process and part two specifically responding to the proposed definition of 'household' sought by Department of Corrections: Ara Poutama Aotearoa (**Corrections**).
- 1.4 In summary the focus of this evidence relates to:
 - (a) The application of the National Policy Statement on Urban Development (**NPS-UD**) and The Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (**the Housing Supply Act**). In particular, requiring 'well-functioning urban environments' as defined in the NPS-UD should be embedded within the Strategic Directions.

- (b) The PDP 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. Of relevance to the Timaru District, the NPS-UD directs district plans to enable more people to live in areas of an urban environment near a centre zone or other areas with many employment opportunities (Objective 3).
- (c) The definition of 'household' proposed by Corrections should be rejected as it will result in Kāinga Ora needing to obtain consent for all its Community Group Housing and would be unable to rely on the 'Supported Residential Care Activity' consenting pathway as provided in the notified pTDP.

2. INTRODUCTION

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

(d) Input into regulatory planning activities including plan reviews and plan variations throughout the South Island.

2.6 I was involved in the review of the pTDP and preparation of a submission for Kāinga Ora as a submitter on the pTDP. I am presenting this corporate evidence in relation to the submission and further submission from Kāinga Ora.

2.7 I am familiar with the Kāinga Ora corporate intent in respect of the provision of housing within the Timaru District. I am also familiar with the national, regional and district planning documents relevant to the pTDP.

2.8 In preparing this evidence I have read the Section 32 and Section 42A reports together with the associated appendices prepared by the Council.

2.9 I can confirm that I am authorised to give corporate evidence on behalf of Kāinga Ora in respect of the pTDP.

Scope of Evidence

2.10 I have been asked to provide corporate evidence in relation to the Kāinga Ora housing portfolio within Timaru and the wider region. This evidence relates to the submission and further submission of Kāinga Ora (#229).

2.11 For the benefit of the panel, this statement of evidence provides a background to Kāinga Ora and the organisation's interest in the pTDP. Sections 3 and 5 of this evidence is relevant across Kāinga Ora submissions on the pTDP and while it will be referenced in subsequent hearings Kāinga Ora does not propose to repeat this within future hearing evidence.

2.12 Kāinga Ora is generally comfortable with where Ms Hollier and Mr Willis have landed in relation to the Kāinga Ora submission points addressed in this hearing stream.

2.13 With respect to Hearing A (Overarching Matters, Part 1 and Strategic Direction), Kāinga Ora supports Ms Hollier's recommendations

responding to the submission from Ara Poutama Aotearoa, The Department of Corrections (“**Corrections**”).¹ Section 6 of this evidence discusses the Kāinga Ora activities/properties which would be unnecessarily restricted if the Corrections submission seeking a new definition of ‘household’ was to be accepted.

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. Under the Crown Entities Act 2004, Kāinga Ora is a crown entity and is required to give effect to Government policy.

The Kāinga Ora – Homes and Communities Act 2019

3.2 The Kāinga Ora Act sets out the functions of Kāinga Ora in relation to housing and urban development.

3.3 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.

3.4 The statutory objective² 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 meets diverse needs;
- (b) Support good access to jobs, amenities and services; and

¹ Submission point 229.69FS

² Section 12, Kāinga Ora Homes and Communities Act 2019

(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 responsible for providing homes to those in need from the Ministry of Social Development Housing Register (“Housing Register”). Kāinga Ora is currently the largest residential landlord in New Zealand, providing public housing³ to more than 185,000 people⁴ who face barriers (for a number of reasons) to housing in the wider rental and housing market.
- 4.2 Kāinga Ora owns or manages more than 72,750 properties throughout Aotearoa, including about 4,927 properties for community groups that provide housing services and transitional housing.⁵
- 4.3 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 have made housing less affordable and as such there is an increased demand for public housing.
- 4.4 There has been a marked change in the type of housing that is required by the Kāinga Ora tenant base. 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.
- 4.5 As a result, many state houses do not match the changing demand for public housing, with a large proportion of the Kāinga Ora housing stock comprising older 3-bedroom homes on large lots which are too large for smaller households and too small for larger households. This

³ Public housing is an umbrella term for state housing and community housing.

⁴ Kāinga Ora – Homes and Communities Annual Report 2022-23; [Annual-Report-2022-2023.pdf \(kaingaora.govt.nz\)](#), see page 25

⁵ <https://kaingaora.govt.nz/assets/Publications/Managed-stock/Managed-Stock-National-Summary-December-2023.pdf>

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.

- 4.6 To meet this 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.

Timaru Context

- 4.7 The Timaru portfolio currently consists of 417 units, comprising of 1-bedroom (13.1%), 2-bedroom (42%), 3-bedroom (40%), and 4-bedroom (4.5%).⁶ There are currently no five bedroom or larger homes within Timaru.
- 4.8 In the last 5 years, the housing register for Timaru has increased by nearly fourfold from 37 households needing housing in 2018⁷, to 143 households needing housing in 2024. This is generally consistent with national and regional public housing trends. Over this period (December 2018 – December 2023), the number Kāinga Ora homes available within Timaru has only been able to increase by six homes.⁸
- 4.9 Similarly, the existing Kāinga Ora portfolio in Timaru does not meet the needs and demands of the growing housing register waitlist. In Timaru, the portfolio of Kāinga Ora currently consists of approximately 82% 2-bedroom and 3-bedroom homes, with only approximately 13.1% of 1-bedroom homes.⁹ The demand for 1-bedroom homes makes up approximately 58% of the total demand for homes on the Housing Register in Timaru,¹⁰ which requires a response from Kāinga

⁶ Managed Kāinga Ora rental properties by Territorial Local Authority as at 30 September 2023 [Managed-Stock-TLA-September-2023.pdf \(kaingaora.govt.nz\)](#)

⁷ Ministry of Social Development, Housing Register as at December 2018 [housing-register-december-2018.xlsx \(live.com\)](#)

⁸ The housing dashboard, Key Stats by TLA, [Key Stats by TLA - Te Tūāpapa Kura Kāinga - Ministry of Housing and Urban Development \(hud.govt.nz\)](#) (March 2024)

⁹ Managed Kāinga Ora rental properties by Territorial Local Authority as at 30 September 2023 [Managed-Stock-TLA-September-2023.pdf \(kaingaora.govt.nz\)](#)

¹⁰ Ministry of Social Development, Housing Register as at December 2023 [www.msd.govt.nz](#)

Ora to reconfigure its housing portfolio to increase the supply of more 1-bedroom homes.

- 4.10 Kāinga Ora is building additional public housing in Timaru to give effect to the Public Housing Plan 2021-2024,¹¹ which includes a target of 150-250 public homes to be delivered by June 2024, in the wider Otago, South Canterbury, and Southland operating region; of which Timaru is located. Much of this housing has been targeted for delivery in Dunedin, however Kāinga Ora will also construct homes in Timaru to respond to the public housing demand.
- 4.11 Notable development projects that are currently under investigation and/ or development to respond to demand within Timaru include the proposed developments in Tyne/ Essex Street, Cain Street, and the development at 29 Grey Road¹².
- 4.12 Both within the context described above, and in accordance 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 within high accessibility to jobs, amenities and services.

5. KĀINGA ORA SUBMISSION AND FURTHER SUBMISSION

- 5.1 The Kāinga Ora submission and further submission points allocated to the Stream A hearings are attached in **Appendix 1**.
- 5.2 Kāinga Ora seeks to ensure that the pTDP provisions align with national planning directions. In particular, the objectives of NPS-UD 2020 and policies 1, 2, 5 and 6, to provide for well-functioning environments that meet the needs of current and future generations. and Kāinga Ora seeks amendments to the pTDP to ensure that development opportunities are maximised in locations that are located close to public transport, employment opportunities and public amenities such as education facilities, retail, and community services. In this way, well-functioning environments are formed to provide for the whole communities social, economic, and cultural well-being.

¹¹ Public Housing Plan 2021-2024 [Public-Housing-Plan-2021-2024-web.pdf \(hud.govt.nz\)](https://www.hud.govt.nz/public-housing-plan-2021-2024-web.pdf)

¹² [Canterbury - Timaru and Temuka | Social Pinpoint \(kaingaora.govt.nz\)](https://www.kaingaora.govt.nz/canterbury-timaru-and-temuka-social-pinpoint)

6. RECOMMENDATIONS BY SECTION 42A – PART 1 AND GENERAL MATTERS REPORT AND RESPONSE

6.1 Having reviewed the respective Section 42A report, Kāinga Ora support recommendations by the reporting planner Ms Hollier on those Kāinga Ora submission points addressed through this hearing. In particular, Kāinga Ora supports Ms Hollier's recommendation to reject the submission point from Corrections seeking a new definition of 'household'.¹³

Definition – (new) Household

6.2 Kāinga Ora opposed the submission from Corrections, which sought a new definition for 'household' to be included in the plan¹⁴ as there was concern on how the proposed definition of 'household' would relate to other defined activities in the pTDP.¹⁵ The definition, as proposed:

Household:

Means a person or group of people who live together as a unit whether of not:

- a. *Any or all of them are members of the same family; or*
- b. *One of more members of the group (whether or not they are paid) provides day-to-day care, support and supervision to any other members(s) of the group.*

6.3 Corrections outlined in their submission that this new definition was necessary to clarify that 'a household is not necessarily limited to a family unit or a flatting arrangement'.¹⁶ Ms Hollier has rejected this submission point by Corrections and disagreed that the term 'household' should be further defined for clarity.¹⁷

6.4 Kāinga Ora provides, as part of its activities, residential accommodation where there is some support provided to those residing in the residential unit. This supported housing brings together publicly

¹³ s42A Report: Part 1 and Overarching Matters, para 283

¹⁴ Submission point 239.4

¹⁵ Submission point 229.69FS

¹⁶ Submission 239

¹⁷ S42A Report: Part 1 and Overarching Matters, para 283

funded housing with support services that are essential to the wellbeing of people and whānau living in the home. Supported housing can include some of the housing provided within both transitional housing, and community group housing.

- 6.5 Community Group Housing (**CGH**) provides residential and non-residential¹⁸ community housing for people with specific and often complex needs. This can include people living with mental illness, people who have physical and/or intellectual disabilities, people who abuse substances or have addictions, people who require refuge, families who need emergency housing, and children/youth at risk. Importantly, residents of these homes are not detained on site, nor are they held under the Intellectual Disability (Compulsory Care and Rehabilitation) Act 2003.
- 6.6 Kāinga Ora rents or leases properties directly to specialist third-party CGH Providers. Homes are carefully selected to meet the needs of the Provider and their customers, and where required, Kāinga Ora will undertake modifications to ensure the home meets the agreed requirements. These homes generally house up to six (but more often, four) individuals within an existing standard residential unit. Over half of the homes we provide are 1-, 2- and 3-bedroom properties, with the remainder being 4-, 5- or more bedrooms. The largest property we provide for CGH has 18-bedrooms, however the largest in Canterbury is 10-bedrooms.
- 6.7 CGH situations generally encompass a typical household living situation and where possible residents are encouraged and supported to live independently as ability allows (for example household tasks). In most CGH, staff will be present at the home as needed, but staff will not live on the site. Some CGH will provide support services from the site, for instance family support (such as Plunket, Barnardos, Tamariki Ora, budgeting).
- 6.8 Generally, this sort of activity has been assessed and accepted as 'residential activity'. Prior to the National Planning Standards, some

¹⁸ Any non-residential activities (if provided) will be assessed under the relevant planning framework

plans¹⁹ explicitly stated the types of residential use provided by CGH under the definition of residential activity. Some plans include a controlled activity status for where the number of residents exceed a threshold defined in the residential activity definition.

- 6.9 When providing supported housing for a CGH provider, Kāinga Ora, in most cases, seeks for homes to be located in existing residential areas, close to amenities and services to best enable and allow residents to participate in the local community. It is the position of Kāinga Ora that CGH (generally) is no different to any other residential use. Kāinga Ora seek that any CGH falls under residential activities, and be a permitted activity in residential zones.
- 6.10 It is noted that there is a definition for 'Supported Residential Care Activity' in the pTDP. Kāinga Ora supported this definition in the pTDP and sought that it be retained.²⁰ The 'Supported Residential Care Activity', as notified in the pTDP would cover most of the CGH.
- 6.11 In the General Residential Zone, 'supported residential care activity' is provided for as a permitted activity, where it is within an existing residential unit.²¹ A 'Residential Unit' is defined as *'a building(s) or part of a building that is used for a residential activity exclusively by one household, and must include sleeping, cooking, bathing and toilet facilities.'* This definition is from the National Planning Standards 2019 (**Standard**).
- 6.12 The Corrections submission appears to be concerned that the term 'household' in the 'Residential Unit' definition.
- 6.13 Kāinga Ora agrees with Ms Hollier that 'household' is not restricted to only family or flatting situations. A household is simply a group of individuals who live together. If it wasn't for the 'supported residential care activity' definition and activity in the pTDP, Kainga Ora would classify CGH as a residential unit. In other plans, even where the isn't a supported residential care pathway (which CGH would fall under), Council's have accepted that Kāinga Ora CGH is primarily a

¹⁹ Nelson City Plan, Marlborough District Council, Christchurch District Plan

²⁰ Submission point 229.6

²¹ pTDP Rule GRZ-R6

residential activity, and that the residents form a residential unit or household. This has been tested on multiple occasions through multiple plans.

- 6.14 If the proposed definition of 'household' is adopted, it may create a barrier for Kāinga Ora CGH, and may change the 'residential activity' status of CGH. This is because the proposed definition specifies that (emphasis added)

*'means a person or **group of people who live together as a unit...**
(b) one of more **members of the group (whether or not they are paid) provides day-to-day care, support and supervision to any other(s) of the group.'***

- 6.15 As read, those that provide the care or support services must also reside at the house (if they are not a family member). For Kāinga Ora, this would mean that CGH would not be considered a residential unit, as staff work shifts or sessions, and do not always reside in the home.

- 6.16 Additionally, the proposed 'household' definition results in what would otherwise be permitted 'supported residential care activity' (which Kāinga Ora would rely on for CGH activity in Timaru), to become a discretionary activity. This is because permitted activity rules GRZ-R6, MRS-R6, GRUZ-R6 and RLZ-R8, all require the 'supported residential care activity' is to be undertaken within an existing residential unit. As noted above in 6.17, as CGH would not qualify as a residential unit, and therefore be unable to fall under the 'supported residential care activity' permitted activity in the pTDP. It is the view of Kāinga Ora that this outcome is contradictory to the intent of the 'supported residential care activity' pathway in the pTDP.

- 6.17 It is the view of Kāinga Ora that the proposed 'household' definition complicates the application of the 'residential unit' definition and would result in Kāinga Ora CGHs not being assessed as a permitted 'supported residential care activity' activity under rules GRZ-R6, MRZ-R6, GRUZ-R8 and RLZ-R8.

- 6.18 Kāinga Ora, therefore, agrees with Ms Hollier that submission 239.4 be rejected.

Areas of Agreement with Section 42A Report – Strategic Directions and Urban Form and Development

6.19 Having reviewed the respective Section 42A report, Kāinga Ora generally supports the recommendations by the reporting planner Mr Willis relating to other Kāinga Ora submission and further submission points. These submission and further submission points have therefore have not specifically addressed in this evidence.

7. CONCLUSION

7.1 Kāinga Ora agrees with Ms Hollier that proposed definition of 'household', is rejected. The proposed definition will not only complicate what is universally understood and accepted as being a 'residential activity', but also result in activities which would otherwise be considered a standard residential activity now being explicitly excluded and remove the ability for Kāinga Ora to use the 'supported residential care activity' pathway for CGH.

7.2 It is the view of Kāinga Ora that the proposed definition of household is unnecessary given the existing definition of 'supported residential accommodation'.

7.3 Overall, the proposed definition of 'household' does not add value to plan users in terms of interpretation, but rather confuses what is considered to be a residential activity, or what is intended to be captured the permitted activity rules for 'supported residential care activity' in rules GRZ-R6, MRZ-R6, GRUZ-R8 and RLZ-R8.

Josh Neville
02 May 2024

**Appendix 1: Kāinga Ora Submission and Further Submission Points for Stream 1 Hearing
Proposed District Plan Submission**

Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
<p>Part 2 – District Wide Matters: Strategic Direction</p> <p>SD-O1</p>	<p>SD-O1 – Residential Areas and Activities</p> <p>i. <i>There is sufficient residential development capacity in existing and proposed urban areas to meet demand and household choice, provided through:</i></p> <p>a. <i>the use of existing zoned greenfield areas;</i></p> <p>b. <i>a range of densities in existing urban areas; and</i></p> <p>c. <i>higher residential densities in close proximity to the Timaru and Geraldine town centres, and Highfield Village Mall;</i></p> <p>d. <i>the new Future Development Areas identified for the General Residential Zone.</i></p> <p>ii. <i>limited rural lifestyle development opportunities are provided where they concentrate and are attached to existing urban areas, achieve a coordinated pattern of development and are capable of efficiently connecting to reticulated sewer and water infrastructure; and</i></p> <p>iii. <i>limited residential opportunities are maintained in existing rural settlements, subject to adequate servicing.</i></p>	Support	Kāinga Ora supports this objective.	Retain as notified
<p>Part 2 – District Wide Matters: Strategic Direction</p> <p>SD-O3</p>	<p>SD-O3 – Climate Change</p> <p><i>The effects of climate change are recognised and an integrated management approach is adopted, including through:</i></p> <p>i. <i>taking climate change into account in natural hazards management;</i></p> <p>ii. <i>enabling the community to adapt to climate change;</i></p> <p>iii. <i>encouraging efficiency in urban form and settlement patterns.</i></p>	Support	Kāinga Ora supports this objective.	Retain as notified

Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
<p>Part 2 – District Wide Matters: Strategic Direction</p> <p>SD-O4</p>	<p>SD-O4 – Natural Hazards <i>Natural hazards risks are addressed so that:</i></p> <ul style="list-style-type: none"> i. <i>areas subject to natural hazards and risk are identified;</i> ii. <i>development is avoided in areas where the risks of natural hazards to people, property and infrastructure are assessed as being unacceptable; and</i> iii. <i>for other areas, natural hazards risks are appropriately mitigated.</i> 	Support in Part	Kāinga Ora supports this objective in principle, but has some concerns around what would be considered ‘unacceptable’. It is Kāinga Ora’s view that SD-O4 should be amended to more explicitly refer to unacceptable risk being risks to life and human safety.	<p>Amend SD-O4 as follows:</p> <p>SD-O4 – Natural Hazards <i>Natural hazards risks are addressed so that:</i></p> <ul style="list-style-type: none"> i. <i>areas subject to natural hazards and risk are identified;</i> ii. <i>development is avoided in areas where the risks of natural hazards to people, property and infrastructure are assessed as being unacceptable to <u>human health and safety</u>; and</i> iii. <i>for other areas, natural hazards risks are appropriately mitigated.</i>
<p>Part 2 – District Wide Matters: Strategic Direction</p> <p>SD-O6</p>	<p>SD-O6 Business Areas and Activities <i>Business and economic prosperity in the District is enabled in appropriate locations, including by:</i></p> <ul style="list-style-type: none"> i. <i>providing sufficient land for a range of business activities to cater for projected growth;</i> ii. <i>providing opportunities for a range of business activities to establish and prosper, provided that commercial activities outside of commercial areas are limited so they do not detract from the role and function of the City Centre and Town Centre zones.</i> 	Support	Kāinga Ora supports this objective as it provides for business land supply, consistent with Policy 2 of the NPSUD.	Retain as notified

Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
<p><i>Part 2 – District Wide Matters: Strategic Direction</i></p> <p><i>SD-07</i></p>	<p>SD-07 Centres <i>The District’s city and town centres:</i></p> <ul style="list-style-type: none"> <i>i. are maintained and enhanced as vibrant, attractive community focal points, providing a high level of amenity and opportunities for social interaction;</i> <i>ii. are the primary focus for retail, office and other commercial activity;</i> <i>iii. provide for the highest density of business, residential and visitor accommodation, and for intensification opportunities.</i> 	Support	Kāinga Ora supports this objective as it provides appropriate high level direction for how centres are to be managed in the district.	Retain as notified
<p><i>Part 2 – District Wide Matters: Strategic Direction</i></p> <p><i>SD-08</i></p>	<p>SD-08 Infrastructure <i>Across the District:</i></p> <ul style="list-style-type: none"> <i>i. improved accessibility and multimodal connectivity is provided through a safe and efficient transportation network that is able to adapt to technological changes;</i> <i>ii. the provision of new network infrastructure is integrated and co-ordinated with the nature, timing and sequencing of new development;</i> <i>iii. drinking water supplies are protected from the adverse effects of subdivision, use and development;</i> <i>iv. the benefits of regionally significant infrastructure and lifeline utilities are recognised and their safe, efficient and effective establishment, operation, maintenance, renewal and upgrading and development is enabled while managing adverse effects appropriately.</i> 	Support	Kāinga Ora supports this objective as it provides for transport choice and flexibility, as well as seeking coordination and integration of new infrastructure.	Retain as notified

Further Submission

Provision / Chapter Topic	Submitter Name	Sub Point Number	Submission Decision and Summary of Decision Requested (Decision Sought)	Kāinga Ora response (support or oppose) and Kāinga Ora reasons	Decision(s) sought (allow or disallow)
Definitions (new) "Well-functioning Urban Environments"	Timaru District Council	42.7	<p>Amend</p> <p>The definition of 'well-functioning urban environment' from the NPS-UD should be included as it is a term used in the Future Development Area chapter.</p> <p>Relief sought:</p> <p>Add new definition of Well-Functioning Urban Environment as follows: <i>has the same meaning as in clause 1.4 of the National Policy Statement Urban Development (NPSUD) 2020: well-functioning urban environment has the meaning in Policy 1. Policy 1 of NPSUD states: Planning decisions contribute to well-functioning urban environments, which are urban environments that, as a minimum: (a) have or enable a variety of homes that: (i) meet the needs, in terms of type, price, and location, of different households; and (ii) enable Māori to express their cultural traditions and norms; and (b) have or enable a variety of sites that are suitable for different business sectors in terms of location and site size; and (c) have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and (d) support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and (e) support reductions in greenhouse gas emissions; and (f) are resilient to the likely current and future effects of climate change.</i></p>	Support Kāinga Ora support alignment with the NPS-UD.	Allow
UFD - Urban Form and Development UFD-O1 Settlement Patterns	Timaru District Council	42.13	<p>Amend</p> <p>Support the objective, particularly clause (iv) which is consistent with the directives of Objective SD-O8. However, it considers a minor amendment to clause (ii) of UFD-O2 is warranted as the notified version of the clause appears to be incomplete. Inclusion of the word "co-ordinated" with respect to infrastructure is also considered appropriate to ensure consistency of terminology across the PDP (as noted in earlier submission points).</p>	Support in part Consistent with the Kāinga Ora submission, Kāinga Ora supports the additional wording to strengthen the objective.	Allow

Provision / Chapter Topic	Submitter Name	Sub Point Number	Submission Decision and Summary of Decision Requested (Decision Sought)	Kāinga Ora response (support or oppose) and Kāinga Ora reasons	Decision(s) sought (allow or disallow)
			<p>Relief sought: Amend UFD-O1 as follows: <i>A consolidated and integrated settlement pattern that:</i> [...] <i>ii. is integrated and co-ordinated with, and ensures the efficient use of, infrastructure;</i> [...]</p>		
UFD - Urban Form and Development UFD-O1 Settlement Patterns	Ministry of Education	106.7	<p>Amend Consider explicit provision is given to educational facilities throughout the District in urban development to manage the impacts of development on educational facilities, in particular impacts on school capacity. Council has an obligation under the National Policy Statement for Urban Development (NPS-UD) to ensure sufficient additional infrastructure (which includes schools) is provided in urban growth and development (see Policy 10 and 3.5 of Subpart 1 of Part 3: Implementation, in particular).</p> <p>Relief sought: Amend UFD-O1 Settlement Patterns as follows: <i>UFD-O1 Settlement Patterns</i> <i>A consolidated and integrated settlement pattern that:</i> <i>i. efficiently accommodates future growth and capacity for commercial, industrial, community, educational and residential activities, primarily within the urban areas of the Timaru township, and the existing townships of Temuka, Geraldine, and Pleasant Point;</i> [...]</p>	Support Kāinga Ora supports the addition of educational activities to be provided as part new developments and settlement patterns.	Allow
UFD - Urban Form and Development UFD-O1 Settlement Patterns	Waka Kotahi NZ Transport Agency	143.19	<p>Oppose Acknowledges the objective seeks to achieve consolidated and integrated settlement pattern, which, the submitter supports. However, considers there is a contradiction between achieving this pattern and recognising the existing character of an area which is most likely to be low density residential development.</p>	Support Kāinga Ora supports the deletion of recognising existing character and amenity and considers that the following amendment could be made to align with the NPS-UD:	Allow

Provision / Chapter Topic	Submitter Name	Sub Point Number	Submission Decision and Summary of Decision Requested (Decision Sought)	Kāinga Ora response (support or oppose) and Kāinga Ora reasons	Decision(s) sought (allow or disallow)
			Relief sought: Amend UFD-O1 as follows: <i>UFD-O1 Settlement Patterns A consolidated and integrated settlement pattern that:</i> [...] <i>v. is well designed, of a good quality, recognises existing character and amenity and is attractive and functional to residents, business and visitors.</i> [...]	<i>is well designed, of a good quality, recognises the planned built environment-existing character and amenity and is attractive and functional to residents, business and visitors.</i>	
SD - Strategic Direction SD-O1 Residential Areas and Activities	Silver Fern Farms	172.13	Amend Considers that the fundamental land use planning issue of separation between incompatible uses should be expressed in this objective. Relief sought: Amend SD-O1 as follows: <i>SD-O1 Residential Areas and Activities</i> [...] <i>iv. The location of new residential areas and activities avoids creating conflict with incompatible zones and activities.</i>	Oppose Kāinga Ora opposes this relief, noting that the presence of Industrial landuses in proximity to residential areas does not, in and of itself, present a reverse sensitivity effect warranting additional controls or management. Kāinga Ora also consider that effects in relation to industrial activities should be managed at source.	Disallow
Definitions “Urban Development”	Canterbury Regional Council (Environment Canterbury)	183.9	Amend Suggests drafting a new definition of urban development, as the current definition was developed to be specific to Kāinga Ora. The drafting should be in line with the definition of Urban in the CRPS and ensure that there is a clear delineation between urban, rural, and rural residential. Relief sought: Delete definition of Urban Development and replace as follows: <u>Urban development</u> <u>means development within an area zoned as a Residential Zone, Settlement Zone, Commercial and Mixed Use Zone, General Industrial</u>	Oppose Kāinga Ora does not consider the proposed definition is appropriate, is lengthy and ambiguous and considers that the following amendment to the proposed district plan definition to address the concerns of ECan: <u>The Development of housing, commercial, industrial, and</u>	Disallow

Provision / Chapter Topic	Submitter Name	Sub Point Number	Submission Decision and Summary of Decision Requested (Decision Sought)	Kāinga Ora response (support or oppose) and Kāinga Ora reasons	Decision(s) sought (allow or disallow)
			<u>Zone, or an Open Space Zone that is adjacent to the aforementioned zones. It also includes development outside of these zones which is not of a rural or rural-lifestyle character and is differentiated from rural development by its scale, intensity, visual character and the dominance of built structures. For the avoidance of doubt, it does not include the provision of regionally significant infrastructure in Rural Zones.</u>	<u>community activities, or other amenities, infrastructure, facilities, services, or works located within urban areas. This includes the development and renewal of urban environments.</u>	
UFD - Urban Form and Development General	Canterbury Regional Council (Environment Canterbury)	183.19	<p>Amend</p> <p>Considers a number of the objectives and policies in the Future Development Area chapter are relevant at a strategic level, and should be incorporated in the Strategic Directions chapter, and/or the Urban Form and Development chapter. Those two chapters are extremely important when considering applications for private plan changes. In addition, more detail is required to ensure that the National Policy Statement on Urban Development is given effect and meaning in the local context.</p> <p>Relief sought:</p> <p>Reconsider the objectives and policies and consider movement of relevant objectives and policies from the Future Development Areas chapter to the Strategic Directions chapter and/or Urban Form and Development Chapter, and ensure the provisions give effect to the NPS-UD and meaning is provided in the local context.</p>	<p>Support</p> <p>Consistent with the Kāinga Ora submission. Kāinga Ora supports the alignment of objectives and policies that align with the NPS-UD.</p>	Allow
UFD - Urban Form and Development (new) Policy	Canterbury Regional Council (Environment Canterbury)	183.21	<p>Amend</p> <p>Opposes that there is no minimum yield for new urban areas in the plan. Minimum yields are an important part of ensuring that a range of housing choices are provided, that infrastructure is developed in an efficient manner, and that the rural land resource on the urban fringe is also developed so that it is maximised.</p> <p>Relief sought:</p> <p>Amend the Urban Form and Future Development Chapter to include a policy UFD-PX, to ensure that housing in Future Development Areas is developed with a minimum yield of 12 household per hectare over the</p>	<p>Support</p> <p>Kāinga Ora supports the inclusion of minimum yields to support intensification at a level that supports housing choice.</p>	Allow

Provision / Chapter Topic	Submitter Name	Sub Point Number	Submission Decision and Summary of Decision Requested (Decision Sought)	Kāinga Ora response (support or oppose) and Kāinga Ora reasons	Decision(s) sought (allow or disallow)
			area of an FDA, and provide for a range of densities within the FDA to ensure that housing choice is provided within new development areas.		
Definitions "Reverse sensitivity"	KiwiRail Holdings Limited	187.14	<p>Amend</p> <p>Supports subject to amendment. Considers the definition should recognise that in the context of rail, activities are more than operation of the railway and should encompass development, upgrading and ongoing maintenance of the rail network including rail yards.</p> <p>Relief sought: <i>Amend the definition of Reverse Sensitivity as follows: means the potential for the <u>development, upgrading, operation and maintenance</u> of an <u>approved, existing lawfully permitted established</u> activity to be compromised, constrained, or curtailed by the more recent establishment or alteration of another activity which may be sensitive to the actual, potential or perceived adverse environmental effects generated by an <u>approved, existing or permitted</u> activity.</i></p>	Oppose Kāinga Ora opposes the suggested changes to the definition. Kāinga Ora consider that the development and upgrading of an activity (such as rail, highways or industrial activities) must mitigate effects at source.	Disallow
Definitions (new) "Household"	Ara Poutama Aotearoa, The Department of Corrections	239.4	<p>Amend</p> <p>The submitter seeks that a new definition, to clarify that a household is not necessarily limited to a family unit or a flatting arrangement (which are more commonly perceived household situations).</p> <p>Relief sought: Insert new definition as follows: <u>Household:</u> <i>means a person or group of people who live together as a unit whether or not:</i></p> <p><i>a. any or all of them are members of the same family; or b. one or more members of the group (whether or not they are paid) provides day-to-day care, support and supervision to any other member(s) of the group.</i></p>	Oppose Kāinga Ora seeks clarity as to how this definition relates to other defined activities within the Proposed District Plan.	Disallow

Provision / Chapter Topic	Submitter Name	Sub Point Number	Submission Decision and Summary of Decision Requested (Decision Sought)	Kāinga Ora response (support or oppose) and Kāinga Ora reasons	Decision(s) sought (allow or disallow)
			<u>AND</u> <u>Any consequential amendments required to give effect to this relief.</u>		

Appendix 2: Kāinga Ora Updated Relief Sought following S42A

In the table below black text is as notified, “blue mark up” amendments from S42A Report, and “red mark” Kāinga Ora evidence relief sought.

Provision	Submission or Further Submission Reference	Kāinga Ora Relief sought	S42A Recommendation	Kāinga Ora Updated Relief
Definitions (new) “Household”	#239.4 Ara Poutama Aotearoa, The Department of Corrections Amend The submitter seeks that a new definition, to clarify that a household is not necessarily limited to a family unit or a flatting arrangement (which are more commonly perceived household situations). Relief sought: Insert new definition as follows: <u>Household:</u> <u>means a person or group of people who live together as a unit whether or not:</u> <u>a. any or all of them are members of the same family; or b. one or more members of the group (whether or not they are paid) provides day-to-day care, support and supervision to any other member(s) of the group.</u> <u>AND</u> <u>Any consequential amendments required to give effect to this relief.</u>	Oppose Kāinga Ora seeks clarity as to how this definition relates to other defined activities within the Proposed District Plan. Disallow	Reject	<u>Household:</u> <u>means a person or group of people who live together as a unit whether or not:</u> <u>a. any or all of them are members of the same family; or</u> <u>b. one or more members of the group (whether or not they are paid) provides day-to-day care, support and supervision to any other member(s) of the group</u>