

Roxanne Davies

From: Emily McEwan
Sent: Friday, 7 May 2021 02:30 p.m.
To: District Plan Submissions
Subject: FW: Kainga Ora submission to Variation 2 of Dunedin District Plan
Attachments: 20210507 Attachment One - Kainga Ora 2GP Variation 2 Submission Points May2021 FINAL.pdf;
20210507 Dunedin 2GP May2021 Submission Letter vSIGNED.pdf

Categories: Roxanne dealing with

Hi Roxy,

Can you please update Kāinga Ora's submission files as per this email/attachments, and as per the email from Brendon Liggett on Monday 3 May (also in this inbox). The existing documents on file for Kāinga Ora's submission need to be archived as partially withdrawn and replaced by these documents.

Thanks,

Emily

From: Brendon Liggett
Sent: Friday, 7 May 2021 12:33 p.m.
To: Emily McEwan
Cc: Tim Blake ; Paul Commons ; Hayley Fitchett ; developmentplanning ; Anna Johnson
Subject: RE: Kainga Ora submission to Variation 2 of Dunedin District Plan

Hi Emily

Further to our letter of 03 May please find enclosed a copy of those aspects of the Kāinga Ora submissions that it retains for advancement through the Plan Variation 2 process.

Please do not hesitate to contact me should you wish to discuss further.

Regards



Brendon Liggett

Manager Development Planning
National Planning
Urban Planning and Design

Mobile: 021 487 295

Email: brendon.liggett@kaingaora.govt.nz

Freephone: 0800 801 601 | Mainline: (04) 439 3052 | Kāinga Ora - Homes and Communities
PO BOX 2628 Wellington 6140 | New Zealand Government | www.kaingaora.govt.nz

From: Emily McEwan <Emily.McEwan@dcc.govt.nz>

Sent: Tuesday, 4 May 2021 11:00 AM

To: Brendon Liggett <Brendon.Liggett@kaingaora.govt.nz>

Cc: Tim Blake <Tim.Blake@kaingaora.govt.nz>; Paul Commons <Paul.Commons@kaingaora.govt.nz>; Hayley Fitchett <Hayley.Fitchett@kaingaora.govt.nz>; developmentplanning <developmentplanning@hnzc.co.nz>; Anna Johnson <Anna.Johnson@dcc.govt.nz>

Subject: RE: Kainga Ora submission to Variation 2 of Dunedin District Plan

Hi Brendon,

Thank you for sending through your letter; I recognise the magnitude of your revision.

We appreciate you taking the time to provide further details of the aspects of Kāinga Ora's submission you wish to retain, by Friday. This will assist us with progress towards the further submission phase.

I look forward to continuing to work together.

Kind regards,

Emily McEwan



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From: Brendon Liggett <Brendon.Liggett@kaingaora.govt.nz>

Sent: Monday, 3 May 2021 6:11 p.m.

To: District Plan Submissions <DistrictPlanSubmissions@oa.dcc.govt.nz>; Emily McEwan <Emily.McEwan@dcc.govt.nz>; 2GP Hearings <2gp.hearings@dcc.govt.nz>

Cc: Tim Blake <Tim.Blake@kaingaora.govt.nz>; Paul Commons <Paul.Commons@kaingaora.govt.nz>; Hayley Fitchett <Hayley.Fitchett@kaingaora.govt.nz>; developmentplanning <developmentplanning@hnzc.co.nz>

Subject: Kainga Ora submission to Variation 2 of Dunedin District Plan

Hi

Please find attached letter addressing Kāinga Ora's submission on proposed Variation 2 to the Dunedin City Council District Plan.

Please do not hesitate to contact me should you have questions regarding the attached.

Regards



Brendon Liggett

Manager Development Planning
National Planning
Urban Planning and Design

Mobile: 021 487 295

Email: brendon.liggett@kaingaora.govt.nz

Freephone: 0800 801 601 | Mainline: (04) 439 3052 | Kāinga Ora - Homes and Communities
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Please:

- (1) reply promptly to that effect, and remove this email, any attachment and the reply from your system;
- (2) do not use, disclose or act on this email in any other way. Thank you.

03 May 2021

Attn: City Development Manager

Dunedin City Council
PO Box 5045
Dunedin 9054

Via email: districtplansubmissions@dcc.govt.nz

cc: Emily McEwan, Policy Planner

Via email: Emily.McEwan@dcc.govt.nz

Gary Rae, Chairperson Independent Hearings Panel

Via email: gpr.hearings@dcc.govt.nz

RE: Submission on the Dunedin City Council's Plan Variation 2 by Kainga Ora – Homes and Communities

Kāinga Ora has made submissions to the Dunedin City Council's Plan Variation 2, broadly these submissions support those provisions that enable additional housing capacity, creating a more compact city and liveable neighbourhoods in the Dunedin region. While through its submissions Kāinga Ora noted that aspects of the notified Variation 2 provided some enhancements to the regulatory framework within Dunedin Kāinga Ora also sought changes, within the confines of the notified variation, to provide greater alignment with the outcomes sought by the National Policy Statement on Urban Development.

Following discussions between Kāinga Ora and the Council on its process to date Kāinga Ora has determined that continued involvement in the Variation 2 process is not the most efficient or effective manner in which to collaborate with the Council on achieving the mutually beneficial outcomes of delivering a planning framework that facilitates the delivery of a variety of housing types and forms in a manner which address housing demand.

Kāinga Ora therefore confirms, consistent with its recent discussions, that it withdraws its submission with the exception of those elements of the submission which seek the deletion in full, or consequential amendments associated with the deletion, of those provisions that establish "social housing" as a landuse activity and any District Plan rules associated with such landuse. To assist the Council in advancing its process of the notification of submissions Kāinga Ora will provide the Council a copy of those aspects of its submissions that are not withdrawn by Friday 07 May 2021.

Kāinga Ora understands that the Council's report of 16 April 2021 does not identify the submissions that Kāinga Ora retains as beyond scope of the Plan Variation 2. Accordingly, Kāinga Ora makes no further statement in respect of this report or any potential decisions of the Independent Hearings Panel with respect to section 41D of the Resource Management Act.

Kāinga Ora welcomes continued collaboration with the Council on current and future regulatory methods and processes that will improve the housing outcomes for all communities across the Dunedin region.

Please do not hesitate to contact the under signed should you have any questions regarding the enclosed.

Regards



Brendon Liggett
Manager Development Planning
Urban Planning and Design
brendon.liggett@kaingaora.govt.nz



Attachment One – Table 1: Schedule of submission points on PV2 which Kāinga Ora either supports, seeks amendment to, or opposes.

No.	Issue / Provision	PV2 summary of changes reference	Kāinga Ora’s Position (Support / Oppose)	Reasons for submission	Relief sought: Relief / Amendments sought by Kāinga Ora is shown in red . Additions are <u>underline</u> and deletion is in red strikethrough . Note (...) means there is more text present in Variation 2 that is not included below for brevity. Black text <u>underlined</u> or strikethrough are the provisions as notified in Variation 2. All amendments & relief sought from Kāinga Ora can be further found in <i>Attachment 3</i> .											
Chapter A: Section 1.3 – Nested tables																
1.	1.3.2 Land Use activities	C1	Oppose	<p>Kāinga Ora opposes the proposed changes in PV2 to the identification of ‘social housing’ as a separate sub-activity with specific provisions under ‘standard residential’ activity and seeks all amendments on ‘social housing’ provisions are deleted from PV2.</p> <p>Kāinga Ora is of the view that the proposed provision is unlawful in terms of not achieving the purpose and principles of the Act and other legislation. In that regard, Kāinga Ora opposes the proposed amendments to establish a separate activity classification for social housing as set out in PV2.</p> <p>Deletion sought.</p>	<div>Residential Activities Category</div> <table><tr><th>Activities</th><th>Sub-activities</th></tr><tr><td rowspan="3">Supported living facilities</td><td>Rest homes</td></tr><tr><td>Retirement villages</td></tr><tr><td>Student hostels</td></tr><tr><td rowspan="2">Standard residential</td><td>Papakāika</td></tr><tr><td>Social housing</td></tr><tr><td>Working from home</td><td>...</td></tr></table>	Activities	Sub-activities	Supported living facilities	Rest homes	Retirement villages	Student hostels	Standard residential	Papakāika	Social housing	Working from home	...
Activities	Sub-activities															
Supported living facilities	Rest homes															
	Retirement villages															
	Student hostels															
Standard residential	Papakāika															
	Social housing															
Working from home	...															
Chapter A: Section 1.4 – Definitions																
2.	Social housing	C1	Oppose	<p>Kāinga Ora opposes the proposed changes in PV2 to the identification of ‘social housing’ as a separate sub-activity with specific provisions under ‘standard residential’ activity and seeks all amendments on ‘social housing’ provisions are deleted from PV2.</p> <p>Kāinga Ora is of the view that the proposed provision is unlawful in terms of not achieving the purpose and principles of the Act and other legislation. In that regard, Kāinga Ora opposes the proposed amendments to establish a separate activity classification for social housing as set out in PV2.</p> <p>Deletion sought.</p>	Social Housing Residential activity where premises are let by or on behalf of the DCC; or by Kāinga Ora Homes and Communities or a registered community housing provider where in accordance with the Public and Community Housing Management Act 1992.											

No.	Issue / Provision	PV2 summary of changes reference	Kāinga Ora's Position (Support / Oppose)	Reasons for submission	Relief sought: Relief / Amendments sought by Kāinga Ora is shown in red . Additions are <u>underline</u> and deletion is in red strikethrough . Note (...) means there is more text present in Variation 2 that is not included below for brevity. Black text <u>underlined</u> or strikethrough are the provisions as notified in Variation 2. All amendments & relief sought from Kāinga Ora can be further found in <i>Attachment 3</i> .
3.	Standard residential	C1	Oppose	<p>Kāinga Ora opposes the proposed changes in PV2 to the identification of 'social housing' as a separate sub-activity with specific provisions under 'standard residential' activity and seeks all amendments on 'social housing' provisions are deleted from PV2.</p> <p>Kāinga Ora is of the view that the proposed provision is unlawful in terms of not achieving the purpose and principles of the Act and other legislation. In that regard, Kāinga Ora opposes the proposed amendments to establish a separate activity classification for social housing as set out in PV2.</p> <p>Amendments sought.</p>	<p>Standard Residential</p> <p>The use of land and buildings for residential activity at a domestic scale. For the sake of clarity, this definition includes:</p> <ul style="list-style-type: none"> • Short-term house rentals boarding houses • Supported living accommodation (with 10 or fewer residents); and • Emergency and refuge accommodation. <p>This definition excludes supported living facilities.</p> <p>Papakāika and social housing are <u>is</u> managed as <u>a</u> sub-activity<u>iesy</u> of standard residential.</p>
Chapter A: Section 2 – Strategic directions					
4.	Policy 2.6.1.X [to be added]	C1	Oppose	<p>Kāinga Ora opposes the inclusion of the proposed policy for the reasons set out in this submission.</p> <p>Kāinga Ora opposes the proposed changes in PV2 to the identification of 'social housing' as a separate sub-activity with specific provisions under 'standard residential' activity and seeks all amendments on 'social housing' provisions are deleted from PV2.</p> <p>Kāinga Ora is of the view that the proposed provision is unlawful in terms of not achieving the purpose and principles of the Act and other legislation. In that regard, Kāinga Ora opposes the proposed amendments to establish a separate activity classification for social housing as set out in PV2.</p> <p>Deletion sought. Further amendments are required in PV2 to align with the relief sought.</p>	<p>Policy 2.6.1.X</p> <p>Encourage the provision of new social housing through rules that provide a more enabling activity status for social housing that exceeds the density standard than for other types of standard residential activity in the General Residential 1 and Township and Settlement zones, except in a no DCC reticulated wastewater mapped area.</p>
Chapter 6: Transportation					
5.	Policy 6.2.2.X [to be added]	C1	Oppose	<p>Kāinga Ora opposes the inclusion of this policy for the reasons outlined in its primary submission.</p> <p>Deletion sought.</p>	<p>Policy 6.2.2.X</p> <p>Only allow medium density social housing in the General Residential 1 or Township and Settlement zones (except in a no DCC reticulated wastewater mapped area) where it is located where there is convenient walking access to public transport services.</p>

No.	Issue / Provision	PV2 summary of changes reference	Kāinga Ora’s Position (Support / Oppose)	Reasons for submission	Relief sought: Relief / Amendments sought by Kāinga Ora is shown in red . Additions are <u>underline</u> and deletion is in red strikethrough . Note (...) means there is more text present in Variation 2 that is not included below for brevity. Black text <u>underlined</u> or strikethrough are the provisions as notified in Variation 2. All amendments & relief sought from Kāinga Ora can be further found in <i>Attachment 3</i> .																				
6.	6.10.3. X [to be added] Assessment criteria for the contraventions of transportation standards	C1	Oppose	Kāinga Ora opposes the inclusion of this assessment criterion for the reasons outlined in its primary submission. Deletion sought.	<table><tr><th colspan="4">6.10.3 Assessment of performance standard contraventions (performance standards located in zones)</th></tr><tr><td colspan="2">Performance standard</td><td>Matters of discretion</td><td>Guidance on the assessment of resource consents</td></tr><tr><td colspan="4">...</td></tr><tr><td>8.</td><td>Number, location and design of ancillary signs</td><td>a. Effects on the safety and efficiency of the transport network</td><td><i>Relevant objectives and policies:</i> i. Objective 6.2.3 ii. Ancillary signs are located and designed to avoid or, if avoidance is not practicable, adequately mitigate adverse effects on the safety and efficiency of the transport network (Policy 6.2.3.1). <i>Potential circumstances that may support consent application include:</i> iii. The location of the sign will not obstruct or obscure sightlines, pedestrian and cycling or vehicle access.</td></tr><tr><td>X.</td><td>Density: social housing in the GR1 Zone or T&S Zone (except in a no DCC reticulated wastewater mapped area) (Rule 15.5.2.4.y)</td><td>a. Effects on accessibility</td><td><i>Relevant objectives and policies:</i> i. Objective 6.2.2 ii. Medium density social housing in the General Residential 1 or Township and Settlement zones (except in a no DCC reticulated wastewater mapped area) is located where there is convenient walking access to public transport services (Policy 6.2.2.x).</td></tr></table>	6.10.3 Assessment of performance standard contraventions (performance standards located in zones)				Performance standard		Matters of discretion	Guidance on the assessment of resource consents	...				8.	Number, location and design of ancillary signs	a. Effects on the safety and efficiency of the transport network	<i>Relevant objectives and policies:</i> i. Objective 6.2.3 ii. Ancillary signs are located and designed to avoid or, if avoidance is not practicable, adequately mitigate adverse effects on the safety and efficiency of the transport network (Policy 6.2.3.1). <i>Potential circumstances that may support consent application include:</i> iii. The location of the sign will not obstruct or obscure sightlines, pedestrian and cycling or vehicle access.	X.	Density: social housing in the GR1 Zone or T&S Zone (except in a no DCC reticulated wastewater mapped area) (Rule 15.5.2.4.y)	a. Effects on accessibility	<i>Relevant objectives and policies:</i> i. Objective 6.2.2 ii. Medium density social housing in the General Residential 1 or Township and Settlement zones (except in a no DCC reticulated wastewater mapped area) is located where there is convenient walking access to public transport services (Policy 6.2.2.x).
6.10.3 Assessment of performance standard contraventions (performance standards located in zones)																									
Performance standard		Matters of discretion	Guidance on the assessment of resource consents																						
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8.	Number, location and design of ancillary signs	a. Effects on the safety and efficiency of the transport network	<i>Relevant objectives and policies:</i> i. Objective 6.2.3 ii. Ancillary signs are located and designed to avoid or, if avoidance is not practicable, adequately mitigate adverse effects on the safety and efficiency of the transport network (Policy 6.2.3.1). <i>Potential circumstances that may support consent application include:</i> iii. The location of the sign will not obstruct or obscure sightlines, pedestrian and cycling or vehicle access.																						
X.	Density: social housing in the GR1 Zone or T&S Zone (except in a no DCC reticulated wastewater mapped area) (Rule 15.5.2.4.y)	a. Effects on accessibility	<i>Relevant objectives and policies:</i> i. Objective 6.2.2 ii. Medium density social housing in the General Residential 1 or Township and Settlement zones (except in a no DCC reticulated wastewater mapped area) is located where there is convenient walking access to public transport services (Policy 6.2.2.x).																						
Chapter 9: Public health and safety																									
7.	Table 9.5.3(AA) - Assessment of restricted discretionary activities	C1	Oppose	Kāinga Ora opposes the proposed inclusion of this assessment criterion and seeks deletion for the reasons set out in this submission. Deletion sought.	<table><tr><th colspan="3">9.5.3 Assessment of performance standard contraventions</th></tr><tr><td colspan="2">Performance standard</td><td>Guidance on the assessment of resource consents</td></tr></table>	9.5.3 Assessment of performance standard contraventions			Performance standard		Guidance on the assessment of resource consents														
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No.	Issue / Provision	PV2 summary of changes reference	Kāinga Ora's Position (Support / Oppose)	Reasons for submission	Relief sought: Relief / Amendments sought by Kāinga Ora is shown in red . Additions are <u>underline</u> and deletion is in red strikethrough . Note (...) means there is more text present in Variation 2 that is not included below for brevity. Black text <u>underlined</u> or strikethrough are the provisions as notified in Variation 2. All amendments & relief sought from Kāinga Ora can be further found in <i>Attachment 3</i> .		
					AA. Density social housing in the GR1 Zone or T&S Zone (except in a no-DCC reticulated wastewater mapped area) (Rule 15.5.2.4.Y)	a. Effects on efficiency and affordability of infrastructure (wastewater and water supply)	Relevant objectives and policies: i. Objective 9.2.1. ii. Only allow land use activities that may result in land use or development activities in a wastewater serviced area where: 1. it will not exceed the current or planned capacity of that infrastructure at the time of development or compromise its ability to service any permitted activities; or 2. for controlled and restricted discretionary land use activities, communal on-site wastewater detention infrastructure can be integrated into the public wastewater network prior to development in a way that meets DCC's requirements; or 3. an unplanned upgrade to the public wastewater network that addresses any capacity constraints can be implemented prior to development with agreement from the DCC (Policy 9.2.1.1A). iii. Only allow land use activities that may result in land use or development activities in an area with public water supply where: 1. it will not exceed the current or planned capacity of that infrastructure at the time of development or compromise its ability to service any permitted activities; or 2. an unplanned upgrade to the public water supply network that addresses any capacity constraints can be implemented prior to development with agreement from the DCC (Policy 9.2.1.4). iv. Only allow land use activities that may result in land use or development activities in an area without public water supply where: 1. it will not lead to future pressure for unplanned expansion of public water supply infrastructure; or 2. an unplanned extension (and any necessary upgrade) to the public water supply network to provide for the activities can be implemented prior to development with agreement from the DCC (Policy 9.2.1.4A).
Chapter 15: Residential Zones							
8.	Section 15.1.1.1 – General Residential 1 Zone description	A2, B1 and E1	Oppose	Kāinga Ora opposes the proposed amendments to the General Residential 1 Zone description and seeks deletion for the reasons set out in this submission. Amendments sought.	15.1.1.1 General Residential 1 The General Residential 1 Zone covers the city's hill suburbs and valleys of the main urban area of Dunedin and Mosgiel and is characterised by low density suburban residential living. <u>The General Residential 1 Zone covers the majority of the middle to outer suburban areas of Dunedin and Mosgiel and is often applied when rezoning areas of greenfield land on the urban fringes.</u>		

No.	Issue / Provision	PV2 summary of changes reference	Kāinga Ora’s Position (Support / Oppose)	Reasons for submission	Relief sought: Relief / Amendments sought by Kāinga Ora is shown in red . Additions are <u>underline</u> and deletion is in red strikethrough . Note (...) means there is more text present in Variation 2 that is not included below for brevity. Black text <u>underlined</u> or strikethrough are the provisions as notified in Variation 2. All amendments & relief sought from Kāinga Ora can be further found in <i>Attachment 3</i> .												
					<p>Historically, this zone has been characterised by relatively low density suburban development patterns, which arose from a long-standing minimum site size requirement of 500m² and allowance for one dwelling per site. However, as a result of development of the 2GP and its subsequent variation (‘Variation 2’), these rules have been amended to enable change in residential character over time to a slightly denser suburban form, but with retention of requirements around maximum site coverage and provision of outdoor living space to maintain suburban green space.</p> <p><u>The anticipated future character of the General Residential 1 Zone will include:</u></p> <ul style="list-style-type: none">○ <u>stand-alone dwellings, duplexes, and occasionally on larger sites multi-unit attached, ‘terrace style’ developments up to 9m in height;</u>○ sites generally between 400m² and 800m² in size;○ <u>a greater variety in site sizes encouraged by flexibility in the minimum site size rule;</u>○ <u>small (up to 80m²) ancillary residential units where site sizes allow; and</u>○ larger developments that house supported living facilities (rest homes, student hostels)-or social housing where site sizes allow. <p>...</p>												
9.	Land use performance standard 15.5.2 (2) – Density	A2, A3, B1, B3, B4, B6, C1 & E9	Oppose	<p>Kāinga Ora opposes having two separate activity statuses and activity classifications for the public and private market housing sector. Housing should be considered and treated as one activity via district plan mechanisms and “special treatment” should not be given to developers depending on who they are.</p> <p>Kāinga Ora seeks amendments to align with Kāinga Ora’s submission.</p> <p>Amendments sought.</p>	<table><tr><th colspan="2">Zone</th><th>i. Minimum site area for a residential unit (excluding family flats <u>ancillary residential units</u>)</th><th>i. ii. Maximum development potential per site</th></tr><tr><td>a.</td><td>General Residential 1 Zone</td><td>1 per 5400m² or 2 per 500m² where in a single residential building or in the form of a duplex</td><td>1 habitable room per 100m²</td></tr><tr><td colspan="4">....</td></tr></table> <p>...</p> <p>4. Standard residential activity that contravenes the performance standard for density is a non-complying activity, except contravention of the following <u>standards only is a</u> are restricted discretionary activities:</p> <ul style="list-style-type: none">a) papakāika that contravenes the performance standards for density;b) standard residential in the General Residential 2 Zone (infrastructure <u>wastewater</u> constraint mapped area) that contravenes the performance standards for maximum development potential per site (15.5.2.1.c.ii), provided the maximum development potential per site of the activity proposed does not exceed 1 habitable room per 45m²;c) contravention of Rule 15.5.2.3 (bulk and location performance standards for multiple residential buildings on the same site); and <p>X. standard residential in the ICR Zone that contravenes the performance standard for maximum development potential per site (15.5.2.1.e.ii), provided the maximum development potential per site of the activity proposed does not exceed 1 habitable room per 30m² ;- and</p> <p>Y. social housing in the General Residential 1 and Township and Settlement zones (except in a no DCC reticulated wastewater mapped area) where it meets the density standard for General Residential 2.</p>	Zone		i. Minimum site area for a residential unit (excluding family flats <u>ancillary residential units</u>)	i. ii. Maximum development potential per site	a.	General Residential 1 Zone	1 per 5400m² or 2 per 500m² where in a single residential building or in the form of a duplex	1 habitable room per 100m²			
Zone		i. Minimum site area for a residential unit (excluding family flats <u>ancillary residential units</u>)	i. ii. Maximum development potential per site														
a.	General Residential 1 Zone	1 per 5400m² or 2 per 500m² where in a single residential building or in the form of a duplex	1 habitable room per 100m²														
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148.	Table 15.10 (X) [to be added] – Assessment of restricted discretionary activities - Density	F3-4	Oppose	Kāinga Ora opposes the proposed inclusion of this assessment criterion and seeks deletion for the reasons set out in this submission. Deletion sought.	<table><tr><th colspan="4">15.10.3 Assessment of land use performance standard contraventions</th></tr><tr><th colspan="2">Performance standard</th><th>Matters of discretion</th><th>Guidance on the assessment of resource consents</th></tr><tr><td colspan="4">...</td></tr><tr><td rowspan="2">X.</td><td rowspan="2">Density social housing in the GR1 Zone or T&S Zone (except in a no DCC reticulated wastewater mapped area) (Rule 15.5.2.4.y)</td><td>a. Effects on efficiency and affordability of infrastructure</td><td>See Rule 9.5</td></tr><tr><td>b. Effects on accessibility</td><td>See Rule 6.10</td></tr></table>	15.10.3 Assessment of land use performance standard contraventions				Performance standard		Matters of discretion	Guidance on the assessment of resource consents	...				X.	Density social housing in the GR1 Zone or T&S Zone (except in a no DCC reticulated wastewater mapped area) (Rule 15.5.2.4.y)	a. Effects on efficiency and affordability of infrastructure	See Rule 9.5	b. Effects on accessibility	See Rule 6.10
15.10.3 Assessment of land use performance standard contraventions																							
Performance standard		Matters of discretion	Guidance on the assessment of resource consents																				
...																							
X.	Density social housing in the GR1 Zone or T&S Zone (except in a no DCC reticulated wastewater mapped area) (Rule 15.5.2.4.y)	a. Effects on efficiency and affordability of infrastructure	See Rule 9.5																				
		b. Effects on accessibility	See Rule 6.10																				

7 May 2021

Attn: City Development Manager
Dunedin City Council
PO Box 5045
Dunedin 9054

Submission sent via email: districtplansubmissions@dcc.govt.nz

**RE: Submission on the Dunedin City Council's Plan Variation 2 by
Kāinga Ora – Homes and Communities.**

This letter and the **attached document comprise** the submission by Kāinga Ora – Homes and Communities (“**Kāinga Ora**”) on the Plan Variation 2 – Additional Housing Capacity (“**PV2**”) to the Proposed District Plan (“**2GP**”) by Dunedin City Council (“**the Council**”).

Kāinga Ora seeks to work collaboratively with the Council and others, and wishes to discuss its submission on the PV2 to address the matters raised in its submission.

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

Regards



Brendon Liggett
Manager Development Planning
National Planning, Urban Planning and Design
Kāinga Ora – Homes and Communities

SUBMISSION ON PLAN VARIATION 2: ADDITIONAL HOUSING CAPACITY FROM KĀINGA ORA – HOMES AND COMMUNITIES

Introduction

Kāinga Ora – Homes and Communities (“**Kāinga Ora**”) at the address for service set out below provides the following submission on the Plan Variation 2 – Additional Housing Capacity (“**PV2**”) to the Dunedin City Council’s (“the **Council**”) Proposed District Plan (the “**2GP**” or “the **Plan**”) that seeks a suite of changes to specific rule and policy changes.

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.

Below is an overview of the matters of interest to Kāinga Ora, with **Attachment 1** providing the substantive detail of submission matters.

Background

1. Kāinga Ora was established in 2019 as a statutory entity under the Kāinga Ora-Homes and Communities Act 2019. Kāinga Ora consolidates Housing New Zealand Corporation (“**Housing NZ**”), 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 will therefore work across the entire housing spectrum to build complete, diverse communities. 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.¹
- 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; and
 - 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 is focused on enabling and delivering quality urban developments by accelerating the availability of build-ready land, and building a mix of housing including public housing, affordable housing, homes for first home buyers, and market housing of different types, sizes and tenures.
- 5. In the Dunedin region, the public housing portfolio managed by Kāinga Ora comprises around 1,430 dwellings.²
- 6. Kāinga Ora's tenants are people who face barriers (for a number of reasons) to housing in the wider rental and housing market. In general terms, housing supply issues have made housing less affordable around New Zealand and as such there is an increased demand for public housing. This is particularly so within the Dunedin region, where the Ministry of Social Development's ("MSD") housing waitlist register has increased – with 264 households as of December 2020.³ As a result of COVID-19 pandemic this waiting list has increased further.
- 7. The demand for public housing in Dunedin is changing towards one and two-bedroom units. Of the 264 households on the MSD's waitlist for Dunedin as of September 2020:
 - a) 64 per cent of demand is for a one-bedroom unit;
 - b) 23 per cent of demand is for a two-bedroom unit; and

¹ Section 13, Kāinga Ora – Homes and Communities Act 2019

² As of 31st January 2021.

³ Te Manaatū Whakahiato Ora – Ministry of Social Development, December 2020, <https://www.msd.govt.nz/about-msd-and-our-work/publications-resources/statistics/housing/index.html#LatestresultsndashnbnspDecember20201>

- c) 13 per cent of demand is for a three or more bedroom unit.⁴
8. In addition to its role as a public housing provider, landowner, landlord, rate payer and developer of residential housing, Kāinga Ora will play a greater role in urban development more generally. The legislative functions of Kāinga Ora illustrate this broadened mandate and outline two key roles of Kāinga Ora in that regard:
- 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.
9. 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.
10. 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. Strong relationships between local authorities and central government are key to delivering government's priorities on increasing housing supply.

Scope of Submission

11. The submission relates to the inclusion of separate "social housing" provisions proposed under PV2.

The submission is:

12. Kāinga Ora opposes the proposed amendments sought in PV2, which are set out in further detail in this submission and set out in **Attachment 1**.
13. Provided that if the relief sought below and attached is granted:

⁴ Ibid.

- a) The PV2 will be in accordance with the purpose and principles of the Resource Management Act 1991 (“**the Act**”) and will be appropriate in terms of section 32 of the Act; and
 - b) The potential adverse effects that might arise from activities provided for by PV2 will have been addressed appropriately.
14. In the absence of the relief sought, the PV2:
- a) will in those circumstances impact significantly and adversely on the ability of people and communities to provide for their social, economic and cultural wellbeing; and
 - b) does not provide a framework to enable the delivery of sustainable, inclusive, and thriving communities.
15. Kāinga Ora has particular interests regarding the enablement and provision of housing and urban development that supports a range of housing options and contributes to well-functioning urban environments. This includes ensuring that the policy setting and framework in place to achieve these outcomes is effective.
16. Kāinga Ora seeks a number of amendments and/or clarifications to PV2 which are set out in further detail in this submission and the attachments. In particular, but without limiting the generality of the above:

PV2 – Introduction of ‘Social Housing’ provisions

17. **Kāinga Ora opposes the proposed changes in PV2** to the identification of ‘social housing’ as a separate sub-activity with specific provisions under ‘standard residential’ activity and **seeks all amendments on ‘social housing’ provisions are deleted from PV2. See Attachment 1.**
18. Kāinga Ora is of the view that the proposed provision is unlawful in terms of not achieving the purpose and principles of the Act and other legislation. In that regard, Kāinga Ora strongly opposes the proposed amendments to establish a separate activity classification for social housing as set out in PV2.

PV2 – Chapter 1.4: Definitions

19. Kāinga Ora opposes the introduction of a new definition for 'Social Housing', and **seeks the term is deleted**. These terms are not necessary and is unlawful, as reinforced in the submission points made through-out this submission. See **Attachment 1**.

Relief Sought

1. Kāinga Ora seeks the following decisions from Dunedin City Council on PV2:
 - a) That the proposed provisions of the PV2 in relation to separate “social housing” provisions and consenting pathways be deleted or amended as sought in this submission, to address the matters raised in this submission and its attachments.
2. Kāinga Ora does not consider it can gain an advantage in trade competition through this submission.
3. Kāinga Ora wishes to be heard in support of this submission.
4. If others make a similar submission, Kāinga Ora would be willing to consider presenting a joint case with them at a hearing.

Dated this 7th day of May 2021

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Brendon Liggett

Manager Development Planning

National Planning, Urban Design and Planning Group

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Roxanne Davies

From: Brendon Liggett <Brendon.Liggett@kaingaora.govt.nz>
Sent: Monday, 3 May 2021 06:11 p.m.
To: District Plan Submissions; Emily McEwan; 2GP Hearings
Cc: Tim Blake; Paul Commons; Hayley Fitchett; developmentplanning
Subject: Kainga Ora submission to Variation 2 of Dunedin District Plan
Attachments: 20210503 LETTER - DCC PlanVariation2 Partial withdrawal vSIGNED.pdf

Categories: Roxanne dealing with

Hi

Please find attached letter addressing Kāinga Ora's submission on proposed Variation 2 to the Dunedin City Council District Plan.

Please do not hesitate to contact me should you have questions regarding the attached.

Regards



Brendon Liggett

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