

**BEFORE INDEPENDENT HEARING COMMISSIONERS  
IN WELLINGTON CITY**

**I TE MAHERE Ā-ROHE I TŪTOHUA MŌ TE TĀONE  
O TE WHANGANUI-A-TARA**

**IN THE MATTER**                      **of the Resource Management Act 1991**  
**AND**  
**IN THE MATTER**                      **of the hearing of submissions on the**  
**Wellington City Proposed District Plan.**

**HEARING TOPIC:**                      Hearing 1 - Strategic Direction

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**STATEMENT OF PRIMARY EVIDENCE OF BRENDON SCOTT LIGGETT  
ON BEHALF OF KĀINGA ORA – HOMES AND COMMUNITIES**

**(CORPORATE)**

**7 FEBRUARY 2023**

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## 1. EXECUTIVE SUMMARY

- 1.1 My name is Brendon Scott Liggett. I hold the position of Manager of Development Planning within the Urban Planning and Design Group at Kāinga Ora – Homes and Communities (**Kāinga Ora**) and am presenting this evidence on behalf of Kāinga Ora.
- 1.2 The key points addressed in my evidence are to provide:
- (a) The background to Kāinga Ora and the statutory context within which it operates;
  - (b) An overview of the Kāinga Ora portfolio and public housing demand in the national context, and within Wellington City and the Wellington Region, noting the discrepancy between the Kāinga Ora portfolio and the demand by typology for public housing;
  - (c) A summary of the overarching Kāinga Ora submissions on the Wellington City Proposed District Plan (**PDP**), including the rationale for the relief sought, such as:
    - (i) The application of the National Policy Statement on Urban Development 2020 (**NPS-UD**) and the Resource Management (Housing Supply and Other Matters) Amendment Act 2021 (**Amendment Act**);
    - (ii) The application of walkable catchments and intensification provided in walkable catchments from rapid transit stops and centres;
    - (iii) The application of the proposed centres hierarchy;
    - (iv) Various definitions related to residential activity, including Multi-Unit Housing and Assisted Housing;
    - (v) The City Outcomes Contribution policy framework; and
    - (vi) The use of Character and built form Precincts as a qualifying matter.
  - (d) Kāinga Ora considers that current and proposed planning regulations within Wellington City and across the Region constrain the ability to create and deliver well-functioning urban environments.

If the requested relief is adopted, this will not only allow Kāinga Ora to adequately increase and improve its public housing provision, but will also enable the use of under-utilised areas for developments that increase the City's and the Region's overall housing stock.

Ultimately, this will allow more people to live in close proximity to commercial amenity, community services and public transport.

## **2. INTRODUCTION**

2.1 My name is Brendon Scott Liggett. I hold the position of Manager of Development Planning within the Urban Planning and Design Group at Kāinga Ora.

2.2 I hold a Bachelor of Planning from the University of Auckland. I have held roles in the planning profession for the past 20 years and have been involved in advising on issues regarding the Resource Management Act 1991 (**RMA**) and district plans.

2.3 My experience includes five years in various planning roles within local government. For the past 17 years I have been employed by Kāinga Ora.

2.4 I have been providing development planning expertise within Kāinga Ora (including as Housing New Zealand) since 2006. In this role I have:

- (a) Undertaken assessment and identification of redevelopment land within the portfolio;
- (b) Provided input into the strategic land planning, including the Asset Management Strategy, various investment and land use frameworks, and various structure plan processes of Kāinga Ora;
- (c) Provided advice on, and management of, the regulatory planning processes associated with Kāinga Ora residential development projects;
- (d) Managed engagement with local authorities, local communities and other agencies on matters relating to regulatory policy frameworks associated with residential development; and
- (e) Provided advice on, and management of, input into strategic planning activities including plan changes and plan review processes throughout the country. More recently, this has included

providing technical lead and project management of Kāinga Ora submissions to the Proposed Whangārei District Plan, Proposed New Plymouth District Plan and the Proposed Waikato District Plan and submissions on Plan Changes implementing the Amendment Act and the NPS-UD.

2.5 I confirm that I am authorised to give corporate evidence on behalf of Kāinga Ora in respect of the Wellington City PDP.

### **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 (**Kāinga Ora Act**), and brings together Housing New Zealand Corporation, HLC (2017) Ltd and parts of the KiwiBuild Unit. Under the Crown Entities Act 2004, Kāinga Ora is a crown entity and is required to give effect to Government policy.

#### **The Government Policy Statement on Housing and Urban Development**

3.2 The Government Policy Statement on Housing and Urban Development (**GPS-HUD**) was published on 28 September 2021 and provides a shared vision and direction across housing and urban development, to guide and inform the actions of all those who contribute to the housing and urban development sector. The GPS-HUD outlines the need for concerted and ongoing action across six focus areas to realise the vision, outcomes, and future envisaged for Aotearoa New Zealand:

- (a) Ensure more affordable homes are built;
- (b) Ensure houses meet needs;
- (c) Enable people into stable, affordable homes;
- (d) Support whanau to have safe, healthy affordable homes with secure tenure;
- (e) Re-establish housing's primary role as a home rather than a financial asset; and
- (f) Plan and invest in our places.

## **The Kāinga Ora – Homes and Communities Act 2019**

- 3.3 The Kāinga Ora Act sets out the functions of Kāinga Ora in relation to housing and urban development.
- 3.4 Kāinga Ora is the Government's delivery agency for housing and urban development. Kāinga Ora therefore works across the entire housing spectrum to build complete, diverse communities that enable New Zealanders from all backgrounds to have similar opportunities in life. As a result, Kāinga Ora has two core roles:
- (a) being a world class public housing landlord; and
  - (b) leading and coordinating urban development projects.
- 3.5 The statutory objective<sup>1</sup> 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 meet diverse needs;
  - (b) support good access to jobs, amenities and services; and
  - (c) otherwise sustain or enhance the overall economic, social, environmental and cultural well-being of current and future generations.
- 3.6 The statutory functions of Kāinga Ora in relation to urban development extend beyond the development of housing (which includes public housing, affordable housing, homes for first home buyers, and market housing) to the development and renewal of urban environments, as well as the development of related commercial, industrial, community, or other amenities, infrastructure, facilities, services or works.
- 3.7 In its capacity as an Urban Development Agency, the approach Kāinga Ora has taken across the IPI plan changes among Tier 1 authorities has been to ensure the intentions of the Amendment Act and the NPS-UD are incorporated within district plans appropriately and that ultimately permissive and/or enabling provisions are introduced through these plan

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

changes to facilitate the creation of well-designed and well-functioning urban environments.

#### **4. OVERVIEW OF THE KĀINGA ORA PUBLIC HOUSING PORTFOLIO AND DEMAND**

##### **National Context**

- 4.1 Kāinga Ora is responsible for providing homes to those most 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 housing<sup>2</sup> to more than 186,000 people<sup>3</sup> who face barriers (for a number of reasons) to housing in the wider rental and housing market.
- 4.2 Kāinga Ora owns or manages more than 69,000 properties throughout Aotearoa, including about 3,700 properties for community groups that provide housing services and transitional housing<sup>4</sup>.
- 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 such as the Covid-19 global pandemic and financial market issues 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 public housing that is required by the Kāinga Ora tenant base:
- (a) Demand has increased for single bedroom housing required for single persons, the elderly or disabled, and larger homes with four to six bedrooms required to house larger families;
  - (b) As a result, the size of many state houses does not match the changing demand for public housing, with a large proportion of the Kāinga Ora housing stock comprising older 2-3 bedroom homes on

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<sup>2</sup> Public housing is an umbrella term for state housing and community housing.

<sup>3</sup> Kāinga Ora – Homes and Communities Annual Report 2021-22; <https://kaingaora.govt.nz/assets/Publications/Annual-report/Annual-report-2021-22.pdf>, see page 29.

<sup>4</sup> Managed Stock National Summary at September 2022

<https://kaingaora.govt.nz/assets/Publications/Managed-stock/Managed-Stock-National-Summary-September-2022.pdf>

large lots which are too large for smaller households and too small for larger households; and

- (c) This has meant that Kāinga Ora has had to review its housing portfolio and assess how it can respond to the changes in demand, given its current housing supply is skewed towards 2–3-bedroom houses that do not meet the needs of tenants and/or are uneconomic to maintain.

4.5 To meet this need, Kāinga Ora is undertaking one of the largest housing delivery programmes, with an additional 2,973 new public homes (including 946 leased to community housing providers) being added to the Kāinga Ora housing portfolio between October 2019 and October 2022<sup>5</sup> and a continued demand to create more homes.

### **Wellington Context**

4.6 From a regional context, Kāinga Ora has public housing in locations spread throughout the Wellington region; managing a portfolio of nearly 7,800<sup>6</sup> properties across Wellington City (1743), Hutt City (3449), Upper Hutt City (398), Porirua City (1974) and Kāpiti Coast District (219), representing 11.9% of the national portfolio. The Wellington Region portfolio currently consists of 46.3% three and four bedroom properties, with only 12.2 % consisting of one bedroom properties.<sup>7</sup>

4.7 Recently, in the Wellington Region and Wellington City, there has been a marked increase in the Housing Register compared to September 2017 (approximately 157% increase in applicants in Wellington City and 140% applicants in the Wellington Region).<sup>8</sup>

4.8 As is consistent with national and regional public housing demand trends, the existing Kāinga Ora portfolio in Wellington City does not meet the needs and demands of the growing Housing Register waitlist.

4.9 In Wellington City, the portfolio of Kāinga Ora currently consists of approximately 72% two bedroom and larger homes, with only

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<sup>5</sup> Ministry of Housing and Urban Development, Government Housing Dashboard <https://www.hud.govt.nz/stats-and-insights/the-government-housing-dashboard/change-in-public-homes/#tabset>

<sup>6</sup> Managed stock by Territorial Local Authority as at 30 September 2022. <https://kaingaora.govt.nz/assets/Publications/Managed-stock/Managed-Stock-TLA-September-2022.pdf>

<sup>7</sup> Managed stock by Territorial Local Authority as at 30 September 2022.

<https://kaingaora.govt.nz/assets/Publications/Managed-stock/Managed-Stock-TLA-September-2022.pdf>

<sup>8</sup> Ministry of Social Development, Housing Register as at December 2022

approximately 27% one bedroom homes.<sup>9</sup> The demand for one bedroom homes makes up approximately 64% of the total demand for homes on the Housing Register in Wellington City,<sup>10</sup> which requires a response from Kāinga Ora to reconfigure its housing portfolio to increase the supply of more 1 bedroom homes.

- 4.10 In giving effect the Public Housing Plan 2021-2024<sup>11</sup>, which includes a target of 470-690 public homes to be deliver by 2024, Kāinga Ora will respond to the public housing demand by typology required in the Wellington Region. Notable projects that are currently under investigation and/or development to respond to this demand include Arlington Street development in Mt Cook<sup>12</sup>, the proposed development at 28 Adelaide Road, Mt Cook<sup>13</sup>.
- 4.11 Both within the context described above, and in accordance with the principles of the Kāinga Ora Act and in giving effect to government policy, Kāinga Ora seeks a planning framework that enables the delivery of more homes and typologies that meets demand in locations with high accessibility to jobs, amenities and services.

## **5. THE KĀINGA ORA SUBMISSIONS**

- 5.1 Kāinga Ora has lodged comprehensive submissions to the Wellington City PDP. These submissions arise from the operational and development needs of Kāinga Ora, but also reflect a wider interest in delivering the strategic vision and outcomes sought through the Amendment Act and the NPS-UD. The intent of the submissions is to ensure the delivery of a planning framework in Wellington that contributes to well-functioning urban environments that are sustainable and inclusive which contribute towards thriving communities that provide people with good quality, affordable housing choices and support access to jobs, amenities and services.
- 5.2 It should be noted that Kāinga Ora submitted on all IPIs across the Wellington Region, with interest in establishing a regionally consistent planning framework that responds to the regional growth projections and

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<sup>9</sup> Managed stock by Territorial Local Authority as at 30 September 2022.

<https://kaingaora.govt.nz/assets/Publications/Managed-stock/Managed-Stock-TLA-September-2022.pdf>

<sup>10</sup> Ministry of Social Development, Housing Register as at December 2022

<sup>11</sup> Public Housing Plan 2021-2024 <https://www.hud.govt.nz/assets/Uploads/Documents/Public-Housing-Plan-2021-2024-web.pdf>

<sup>12</sup> Arlington St. [Arlington Street :: Kāinga Ora – Homes and Communities \(kaingaora.govt.nz\)](https://www.kaingaora.govt.nz/development/development-projects/arlington-st)

<sup>13</sup> Kāinga Ora Planned Developments [Planned developments :: Kāinga Ora – Homes and Communities \(kaingaora.govt.nz\)](https://www.kaingaora.govt.nz/development/development-projects/planned-developments)



the natural relationships between the urban environments within the Wellington Region.

- 5.3 It is acknowledged that the PDP as notified has the potential to reduce regulatory constraints and increase housing supply as required through both the Amendment Act and the NPS-UD. However, the following key themes of the PDP, as notified, compromise the extent to which the planning provisions enable appropriate development within Wellington:
- (a) The limited extent to which Policy 3 of the NPS-UD have been given effect to, including the corresponding density provisions and proposed walkable catchments, particularly considering Wellington City's role and function within the region and the intent of the NPS-UD to reduce barriers within planning frameworks to enable intensification;
  - (b) That Town Centres have not been included in the centres hierarchy, including the classification of Newtown, Miramar and Tawa as Local Centres instead of Town Centres. The PDP does not provide an ability for Town Centres to support residential intensification, and vice-versa, the opportunity for residential intensification to support the vibrancy and function of the centres;
  - (c) The classification and defining of residential activity in different definitions, with different objectives, policies, rules and standards applying to each proposed definition/activity; particularly the definition for Assisted Housing and associated City Outcomes Contribution policies.
  - (d) The extent to and manner in which Character and built form Precincts have been applied as a Qualifying Matter.
- 5.4 If the Kāinga Ora submissions on the WCC PDP are adopted, particularly in relation to the above and as sought by the expert evidence submitted on behalf of Kāinga Ora, then the constraints inherent in the PDP in its notified form would be reduced, and the PDP would enable greater development capacity in the areas of Wellington City that are most appropriate for urban intensification.

## 6. THE APPLICATION OF THE NPS-UD AND THE AMENDMENT ACT

- 6.1 Within Wellington City and across the Wellington Region, Kāinga Ora has sought an increased application of Medium and High Density Residential Zones (**MDRZ**<sup>14</sup> and **HDRZ**) to an extent that seeks to facilitate the creation of well-functioning urban environments and enable the delivery of a variety of homes to meet the needs of all people of Aotearoa, through the sustainable management of natural and physical resources in accordance with the purpose and principles of the RMA (as amended).
- 6.2 The submissions have sought a spatial application of zoning patterns that acknowledges and responds appropriately to walkable catchments, rapid transit services, , and proximity to commercial amenity, services, employment opportunities and the like, in a manner that is consistent with the principles of the NPS-UD. This includes seeking a defined and distinct spatial hierarchy and distinguishing between the proposed residential zones and enabled heights commensurate with the anticipated future level of commercial activity and community services.
- 6.3 As already stated, there is a high demand for housing in Aotearoa, and to supply a greater number of homes in locations that connect well to jobs, education, transport and amenities. There is, therefore, a strong need to build up, rather than out. Intensification, when done well, can bring a range of benefits to an area, such as greater opportunity for investment in infrastructure and local amenities, increased safety and a stronger sense of community and more public green spaces when part of comprehensive redevelopments.
- 6.4 The creation of provisions within District Plans to enable development in accordance with the NPS-UD will contribute towards a planning system that facilitates the delivery of a variety of homes with a focus on connectivity and functionality within the urban environment. Kāinga Ora acknowledges the PDP, as notified, generally gives effect to the NPS-UD. However, in accordance with the submissions on the PDP, Kāinga Ora seeks amendments to reduce complexity and limitations that have been imposed to ensure a more streamlined and enabling framework for urban

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<sup>14</sup> This is to be distinguished from the Medium Density Residential Standards (MDRS) which is created under the Amendment Act.

development and provides for more people to live in walking distance of key centres and rapid transit.

## **7. WALKABLE CATCHMENTS AND ADDITIONAL HEIGHT AROUND CENTRES**

7.1 As discussed above, Kāinga Ora has an inherent interest in urban development outcomes in Aotearoa, and in doing so, established a Kāinga Ora principle-based approach to walkable catchments and intensification around centres and rapid transit stops in response to the NPS-UD and the Amendment Act. This is used as a starting point for local internal Kāinga Ora planning staff and experts to conduct site-specific analysis to test the principles and the appropriate response in a local context.

7.2 As specified in the evidence of Mr Heale, Mr Rae and Mr Cullen, local research, analysis, and site visits were carried out to determine appropriate walkable catchment, intensification areas and built form outcomes in Wellington City.

7.3 The locally-specific walkable catchment and built form outcomes sought in the Kāinga Ora submissions and expert evidence, such as heights around centres, reflect the outcomes that Kāinga Ora seeks to achieve in providing for well-functioning urban environments that are responsive to the local and regional context, and are supported by appropriate planning, urban design and economic expertise.

## **8. TOWN CENTRES AND CENTRES HIERARCHY**

8.1 Similar to the assessment of appropriate walkable catchments within a local and regional context, Kāinga Ora is interested in the application of planning principles and frameworks by Councils, including the appropriate application of a centres hierarchy.

8.2 Kāinga Ora supports the inclusion of Town Centre in the centres hierarchy and strategic objectives of the PDP. Within the Wellington context, a more robust identification and hierarchy of centres is required in order to identify centres which provide employment opportunities, amenities and services to surrounding suburban catchments, which are beyond what is generally provided by local centres, and enable built form outcomes that reflect the role of the centre in the urban environment.

8.3 Kāinga Ora supports the classification of Newtown, Miramar, and Tawa as Town Centres as proposed in the evidence of Mr Heale, Mr Rae and Mr Cullen, and is particularly supportive of the background information that supports this classification. This is both in regard to national consistency sought through the National Planning Standards, and the role and functions of these centres in the local and regional context.

## 9. DEFINITIONS FOR RESIDENTIAL ACTIVITY

9.1 Kāinga Ora supports the evidence of Mr Heale that residential activity should only be defined as one activity, and should be assessed based on its merits and effects regardless of its typology or tenure.

9.2 **Multi-Unit Housing** – Kāinga Ora supports the evidence of Mr Heale that the term Multi-Unit Housing should be removed from the District Plan. In the experience of Kāinga Ora as a developer, definitions that differentiate residential activity based on number of houses being proposed, with different policies, rules and standards, complicate district plans and create additional consenting risk for intensification. This approach is not consistent with the intent of the NPS-UD or the Amendment Act and is not considered to be necessary in order to ensure an appropriate assessment of the effects from residential activity.

9.3 **Assisted Housing** – Kāinga Ora supports the evidence of Mr Heale that the term Assisted Housing should be removed from the District Plan. As a public housing provider, definitions in district plans that differentiate residential activity based on tenure can put additional requirements on public and affordable housing providers, which in itself can act as a barrier to intensification and public and affordable housing provision. As discussed in paragraph 9.2, different definitions for residential activity complicate district plans and are not consistent with the intent of the NPS-UD and Amendment Act. As the definition for Assisted Housing is only proposed in the PDP in relation to the City Outcomes Contribution policies, my evidence discusses this policy below.

## 10. CITY OUTCOMES CONTRIBUTION POLICY

10.1 Kāinga Ora has an inherent interest in the supply of affordable housing and positive urban development outcomes, but disagrees with the City Outcomes Contribution Policy as proposed across residential and centre

zones. It is considered that policies that require and assess proposed developments beyond the potential or actual effects on the environment is inconsistent with the RMA and disincentivises intensification beyond district plan rules, where intensification may otherwise be appropriate if the effects on the environment are less than minor. Kāinga Ora supports a policy that encourages positive city outcomes, but not one that requires it.

- 10.2 Further, as proposed in the PDP, the City Outcomes Contribution Policies require, among other things, public and affordable housing providers to register encumbrances on Records of Title, which can impact the ability to efficiently and effectively manage public/affordable housing properties or portfolios while meeting changing needs over time. This can have the effect of further disincentivising the provision of public and affordable housing.

## **11. CHARACTER PRECINCTS, MT VICTORIA NORTH TOWNSCAPE PRECINCT AND ORIENTAL BAY HEIGHT PRECINCT**

- 11.1 Kāinga Ora understands that the Council may consider special character or character as a qualifying matter under section 77I(j) of the RMA. However, in accordance with the Kāinga Ora submissions on the PDP, Kāinga Ora is concerned that the proposed Character Precincts, Mt Victoria North Townscape Precinct, and the Oriental Bay Height Precinct (“Precincts”) have not been appropriately assessed against the tests of sections 77J and s77L of the Amendment Act. Further, Kāinga Ora is concerned that the subsequent recommendations and associated provisions cannot be supported to the extent that intensification and urban development are restricted in key areas, particularly those Precincts that are within walking distance of the City Centre and would therefore be subject to Policy 3(c) of the NPS-UD.
- 11.2 The limitation of density within the Precincts, through the provisions of the PDP, is contrary to the purpose and principles of the Amendment Act and the NPS-UD. The Precincts seek the protection of “character” and the existing built form in neighbourhoods that are most appropriate for urban intensification and inhibit the delivery of outcomes sought by both the Amendment Act and the NPS-UD.. While the application of qualifying matters will be addressed in more detail at later hearings, Kāinga Ora considers that more intensification should be provided in these areas, and

that character, as an amenity value, can be managed while still providing for intensification in accordance with the NPS-UD. I agree with the evidence of Mr Heale and Mr Rae on this matter.

- 11.3 While it is noted that the Oriental Bay Height Precinct provides for additional height on a site-specific basis than what would have otherwise been proposed in the HRZ in the PDP, I note that as proposed the underlying zone remains the MRZ and the Precinct is applied as a qualifying matter. Kāinga Ora is not supportive of this approach in light of the national significance of urban development and the objectives of the NPS-UD.

## **12. CONCLUSION**

- 12.1 Current planning regulations in Wellington City provide some ability to create and deliver well-functioning urban environments, in accordance with the Amendment Act and the NPS-UD. However, overly restrictive regulations contribute to both land and housing supply issues. In turn, this puts pressure on house prices and contributes to the lack of affordable housing options across both the public and private housing sectors, whilst also failing to prioritise the redevelopment and intensification of the existing urban environment, particularly around strategic locations such as commercial centres and along key public transport nodes.
- 12.2 Wellington City has an important role within the Wellington Region, as the main employment hub and main business centre, and the planning framework should reflect this role and function and enable as many people as possible to live in areas of high demand and accessibility to jobs, amenity and services.
- 12.3 Kāinga Ora considers that the PDP, as notified, has the potential to reduce regulatory constraints and increase housing supply. However, I consider that if the Kāinga Ora submissions on the PDP are adopted, then the constraints applied by the zoning and provisions of the Plan in its notified form would be further reduced. The proposed amendments suggested by Kāinga Ora would provide a development capacity for delivery of significant additional public housing, affordable housing, homes for first-home buyers, and significant market capacity in Wellington, allowing more people to live in areas that are in close proximity to

employment, commercial amenity, community services and public transport.

- 12.4 The Kāinga Ora submissions partially arise from the operational and development needs of Kāinga Ora. The Kāinga Ora submissions also ensure Kāinga Ora can economically and socially manage and reconfigure its housing portfolio, including ensuring the planning framework provides opportunities for Kāinga Ora to acquire properties in appropriate locations to increase the supply of housing. This is to enable provision of warm dry and healthy homes that are in the right location, right condition and of the right type to meet the current and future needs of those people requiring public housing assistance, as well as enable the development of affordable housing more generally.
- 12.5 The creation of a planning framework that provides for efficient use of residential land will allow for the evolution of urban environments with greater social and cultural vitality, thereby reducing deprivation in low socio-economic communities. If the requested relief is adopted across all the five authorities in the Wellington Region, this will not only allow Kāinga Ora to adequately increase and improve its public housing provision, but can also enable the use of under-utilised areas for developments that increase the Region's overall housing stock.
- 12.6 Through its submissions on WCC PDP, Kāinga Ora is seeking to assist Wellington City to achieve the objective of creating a well-functioning urban environment. This can be done in a manner which enables the redevelopment of existing brownfield land to make better use of infrastructure (including social infrastructure) and improve the social and economic wellbeing of the community and is in line with the Amendment Act and the NPS-UD.

**Brendon Scott Liggett**

7 February 2023