

11 December 2020

Selwyn District Council
Freepost 104 653
PO Box 90
ROLLESTON 7643

Attention: Proposed Selwyn
District Plan Submission

Submission by email via: dprsubmissions@selwyn.govt.nz

RE: Submission on the Proposed Selwyn District Plan by Kāinga Ora – Homes and Communities.

Please find **attached** details of the submission by Kāinga Ora – Homes and Communities (“**Kāinga Ora**”) on the Proposed District Plan (“**PDP**”) from Selwyn District Council (“**the Council**”).

Kāinga Ora currently has a small number of existing land holdings and interests within the Selwyn District (“**the District**”), but has a specific interest in the District in terms of its contribution to housing and urban development within Greater Christchurch. The review of the PDP by Kāinga Ora has been broad, including review of strategic objectives of the PDP in the context of the National Policy Statement on Urban Development (“**NPS-UD**”) and the wider urban development statutory obligations of Kāinga Ora, particularly its statutory objectives regarding the establishment of sustainable, inclusive, and thriving communities¹. One of the key operating principles of Kāinga Ora², is ensuring that the housing it develops is appropriately mixed (with public, affordable and market housing) and is of good quality. Kāinga Ora’s submission has been informed by its statutory objectives and functions³, as well as a wider perspective which seeks to enable a range of housing typologies to be delivered in appropriate locations and contribute to the provision of quality, affordable housing choices that meet the diverse needs of the community.

¹ Section 12 of Kāinga Ora – Homes and Communities Act 2019

² Section 14 of Kāinga Ora – Homes and Communities Act 2019

³ Sections 12 & 13 of Kāinga Ora – Homes and Communities Act 2019

Overall, Kāinga Ora considers that the PDP does not sufficiently and appropriately provide for the long-term residential development capacity needed to meet the population growth expected in Selwyn District. While it is recognised that the Council is attempting to meet the requirements of the NPS-UD, and that this is challenging given the timing of gazettal of the NPS-UD so close to notification of the PDP, Kāinga Ora considers that more work is required to ensure the PDP appropriately responds to the NPS-UD's requirements.

Further compact urban growth needs to be enabled in proximity to Rolleston and other centres, and along key strategic transport corridors and public transport routes in the District. In particular, the zoned Local Centres have a significant number of strategic advantages, such as public transport connectivity (in some cases), proximity to significant open space amenities, community facilities, schools and centres, which means that the PDP should be providing for greater intensification around these areas. This is in line with the imperatives of the NPS-UD which notes that compact urban form in the context of existing urban areas requires further intensification. As such, Kāinga Ora is seeking changes to both the PDP provisions and planning maps.

The Council is required to notify a plan change/variation to implement intensification policies of the NPS-UD no later than 20 August 2022. Kāinga Ora seeks that the current misalignment between the PDP and the NPS-UD is resolved at this stage of the District Plan review process, i.e. through responding to submissions, to assist in efficacy of plan-making and to reduce further complexity to the process being introduced through a subsequent variation/plan change process.

Kāinga Ora recognises their role within the local community as a both a public housing provider and as a lead entity offering support to the wider community. Kāinga Ora seeks to work collaboratively with the Council and wishes to discuss its submission on the PDP to address the matters raised in its submission.

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

Sincerely



Brendon Liggett
Development Planning Manager
Kāinga Ora – Homes and Communities

**SUBMISSION ON THE SELWYN PROPOSED DISTRICT PLAN 2020 BY
KĀINGA ORA - HOMES AND COMMUNITIES**

TO: Selwyn District Council
Freepost 104 653
PO Box 90
ROLLESTON 7643

KĀINGA ORA - HOMES AND COMMUNITIES (“Kāinga Ora”) at the address for service set out below makes the following submission on the Proposed Selwyn District Plan 2020 (“**PDP**”).

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

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

This submission letter provides an overview of the matters of interest to Kāinga Ora with **Attachments (1, 2, 3, 4 and 5)** providing the substantive detail of submission matters.

Background to Kāinga Ora and its Submission

1. Kāinga Ora was established in 2019 as a Crown Entity established under the Kāinga Ora - Home and Communities Act 2019, and brings together Housing New Zealand Corporation, HLC (2017) Ltd and parts of the KiwiBuild Unit. Under the Crown Entities Act 2004, Kāinga Ora is listed as a Crown Entity and is required to give effect to Government policies.
2. Kāinga Ora is now the Government’s delivery entity for housing and urban development. Kāinga Ora therefore works across the entire housing spectrum to build complete, diverse communities that enable New Zealanders from all backgrounds to have similar opportunities in life. As a result, Kāinga Ora has two core roles:
 - a) being a world class public housing landlord; and
 - b) leading and co-ordinating urban development projects.
3. Kāinga Ora’s statutory objective requires it to contribute to sustainable, inclusive, and thriving communities that:
 - a) provide people with good quality, affordable housing choices that meet diverse needs;
 - b) support good access to jobs, amenities and services; and

- c) otherwise sustain or enhance the overall economic, social, environmental and cultural well-being of current and future generations.
4. Kāinga Ora owns or manages approximately 63,800 properties throughout New Zealand comprising of rental properties, community group and transitional housing. Within the Selwyn District, Kāinga Ora manages a small portfolio of dwellings. While there are currently only a small number of dwellings managed by Kāinga Ora in the District (relative to other parts of the country), given part of the District's location within Greater Christchurch, Kāinga Ora will look to deliver and reconfigure housing stock in Greater Christchurch over time, which will allow Kāinga Ora to provide efficient and effective public, affordable and market housing that is aligned with current and future residential demand in the area, and the country as a whole.
 5. In addition to its role as a public housing provider, landowner, landlord, rate payer and developer of residential housing, Kāinga Ora plays a greater role in urban development more generally. The legislative functions of Kāinga Ora⁴ illustrate this broadened mandate and outline two key roles of Kāinga Ora in that regard:
 - (a) initiating, facilitating and/or undertaking development not just for itself, but in partnership or on behalf of others; and
 - (b) providing a leadership or coordination role more generally.
 6. Notably, Kāinga Ora's statutory functions in relation to urban development extend beyond the development of housing (which includes public housing, affordable housing, homes for first home buyers, and market housing) to the development and renewal of urban environments, as well as the development of related commercial, industrial, community, or other amenities, infrastructure, facilities, services or works.
 7. Kāinga Ora is interested in all issues that may affect the supply and affordability of housing and has a shared interest in the community as a key stakeholder, alongside local authorities. These interests include:
 - (a) Minimising regulatory barriers that constrain the ability to deliver housing development;
 - (b) The provision of public housing to persons who are unable to be sustainably housed in private sector accommodation;
 - (c) Leading and co-ordinating residential and urban development projects;
 - (d) The provision of services and infrastructure and how this may impact on Kāinga Ora existing housing, planned residential and community development and Community Group Housing ("CGH") providers; and

⁴ Section 13 of the Kāinga Ora – Homes and Communities Act 2019

- (e) Working with local authorities to ensure that appropriate services and infrastructure are delivered for its developments.
8. Policy decisions made at both central and local government level have impacts on housing affordability. The challenge of providing affordable housing requires close collaboration between central and local government to address planning and governance issues to reduce the cost of construction, land supply constraints, infrastructure provisions and capacity as well as an improved urban environment.
 9. Kāinga Ora’s submission has focused on those provisions of the PDP that, in Kāinga Ora’s view, require amendment to ensure:
 - (a) Kāinga Ora can economically and socially manage, reconfigure and grow its housing portfolio to enable the 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;
 - (b) A range of typologies are enabled to be delivered in appropriate locations for both public and market housing; and
 - (c) The provision of quality, affordable housing choices that meet the diverse needs of the community.
 10. This submission is also informed by the National Policy Statement on Urban Development (“**NPS-UD**”) – which provides further direction around where growth should be located (i.e. within proximity to centres, jobs, education, amenities and services). The NPS-UD seeks to ensure the local authorities enable development capacity for housing and business — through their land-use planning and infrastructure.
 11. From Kāinga Ora’s perspective, the PDP as notified by the Council, has the potential to increase housing supply, but does not sufficiently incentivise the intensification of existing urbanised areas of the district. If Kāinga Ora’s submission on the PDP is adopted, then the current constraints applied by the zoning and the provisions of the PDP in its notified form would be reduced, and additional development capacity for public and affordable dwellings would be provided for on both Kāinga Ora land and across the wider city.

Scope of Submission

12. The submission relates to the PDP as a whole.

The Submission is:

13. Kāinga Ora opposes the PDP, for the reasons set out below and in the attachments.
14. Provided that the relief sought below and attached is granted:
 - (a) The PDP 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 allowed by the PDP will have been addressed appropriately.
15. In the absence of the relief sought, the PDP:
- (a) will not meet statutory obligations under the NPS-UD;
 - (b) is contrary to the sustainable management of natural and physical resources and is otherwise inconsistent with Part 2 of the Act;
 - (c) will in those circumstances impact significantly and adversely on the ability of people and communities to provide for their social, economic and cultural wellbeing; and
 - (d) does not provide a framework to enable the delivery of sustainable, inclusive, and thriving communities.
16. In particular, but without limiting the generality of the above:
17. Kāinga Ora recognises the importance of the PDP in setting the strategic framework for enabling and managing future development as well as achieving sustainable development of the district's natural and physical resources.
18. Due to Kāinga Ora's operational and development requirements, its interest is broad and relates to the PDP provisions proposed to be amended / introduced by the PDP, including (but not limited to) provisions relating to growth, residential development, business activities, subdivision, natural hazards, noise, infrastructure, as well as the spatial application and extent of the proposed zones and overlays in the PDP.
19. There has been a marked change in the type of public housing that is required by Kāinga Ora's tenant base. As such, reconfiguring its housing stock is a priority for Kāinga Ora to better meet the needs of its tenants, as well as to align it with current and future demand in the area, and the country as a whole. The PDP provides opportunities to better facilitate these activities, by including objectives, policies and rules which will enable people and communities to provide for their social and economic wellbeing, and for their health and safety with regard to housing provision and particularly the importance of delivering a range of housing options within the District.
20. However, Kāinga Ora considers that the provisions of the PDP as notified do not sufficiently enable and provide for the residential intensification of existing urban areas required to promote a compact urban form, provide for housing choice and give effect to the NPS-UD. This position is informed by a review of the Council's section 32 analysis and available technical documents supporting the PDP.
21. Kāinga Ora supports a compact urban form for concentrating urban growth in and around existing urban settlements in Selwyn and seeks more emphasis and priority on a compact urban form approach in Selwyn.
22. Kāinga Ora considers that residential intensification in and around centres, and along public transport corridors should be emphasised and enabled further in accordance with the NPS-UD. The NPS-UD requires building height and density to be

commensurate with the level of accessibility to existing or planned public transport and a range of commercial activities and community services. Kāinga Ora is of the view that the PDP as notified does not incorporate the required density uplifts as required by the NPS-UD particularly in the larger settlements such as Rolleston.

23. The Council is required to notify a plan change/variation to implement intensification policies of the NPS-UD no later than 20 August 2022. Kāinga Ora seeks that the current misalignment between the PDP and the NPS-UD is resolved at this stage of the District Plan review process, i.e. through submissions, to assist in efficacy of plan-making and to reduce further complexity to the process being introduced through a subsequent variation/plan change process.
24. There are a number of larger settlements in close proximity to Christchurch which have a significant number of strategic advantages, such as public transport connectivity, proximity to open space amenities, community facilities, and schools, which means that the PDP should be providing for greater intensification in these areas. This is in line with the requirements of the NPS-UD, which notes that intensification of urban areas must be enabled where there is demand or good accessibility to active or public transport to a range of commercial activities and community services.
25. Kāinga Ora is concerned that the PDP provisions, particularly the types of zones and rules proposed, are not the most appropriate policies and methods to achieve the residential and business capacity required in the long term, as required by the NPS-UD. This is particularly the case for the proposed approach within the PDP for providing for medium density residential development. Currently the PDP provides for medium density housing through the comprehensive development and small lot development provisions which apply within the General Residential and Low Density Residential zones. Kāinga Ora oppose this approach as it does not fully optimise the development opportunities and outcomes as there is still an overall density requirement that must be complied with. Furthermore, this approach does not provide for intensification that is spatially targeted into areas where there is demand or good accessibility to active or public transport to a range of commercial activities and community services as required by the NPS-UD.
26. Kāinga Ora considers that methods and rules can be amended or inserted into the PDP to fully optimise the development opportunities and outcomes and meet the requirements of the NPS-UD.
27. One such additional method is the creation of a Medium Density Residential Zone (“MRZ”), which is directed by the NPS-UD to be located within a walkable catchment of centres and public transport. In this regard, Kāinga Ora has provided a set of proposed MRZ provisions in **Attachment 2** and a proposed spatial application of the zone is set out in **Attachments 3 and 4**.
28. Another method is the creation of a Future Urban Zone (“FUZ”) to better signal to the community where settlements are to grow. Kāinga Ora seek these provisions to replace the Urban Growth Overlay, for which Kāinga Ora has provided a set of proposed FUZ provisions in **Attachment 5**.

29. Kāinga Ora considers that the PDP is not currently framed to recognise that as the character of planned urban areas evolves to deliver a compact urban form, amenity values may change. Amendments are proposed to ensure this is reflected more consistently throughout the objectives and policies of the various zones in language that is consistent with the NPS-UD.
30. Kāinga Ora is also of the view that the PDP as currently drafted is putting too much emphasis on density requirements to achieve amenity and built character outcomes while limiting opportunity for intensification. Amenity and character outcomes are managed through standards that define a building envelope rather than density provisions. Kāinga Ora therefore request the deletion of density requirements in the MRZ and GRZ and instead require consent for multiunit development to manage urban design outcomes.
31. In summary, and in addition to the matters addressed below, Kāinga Ora’s submission is that while the PDP contains a range of provisions generally aimed at promoting the sustainable management of natural and physical resources in Selwyn District, primarily through strategic management of growth and by managing the effects of land-use on the environment, there are a number of areas where Kāinga Ora considers that amendments to the PDP are required, both in relation to the provisions (objectives, policies and methods), as well as the spatial extent of the newly proposed zones.
32. Kāinga Ora supports the use and implementation of the National Planning Standards as the template for the PDP.
33. Kāinga Ora seeks a number of amendments to PDP which are set out in further detail in this submission and in:
 - (a) **Attachment 1** – Table 1: Identifies the specific provisions and chapters of the PDP which Kāinga Ora either supports, seeks amendment to, or opposes;
 - (b) **Attachment 2** – Proposed Medium Density Residential Zone Provisions;
 - (c) **Attachment 3** – Proposed Zoning Amendments around Centres;
 - (d) **Attachment 4** – Mapping of Proposed Zoning Amendments; and
 - (e) **Attachment 5** – Proposed Future Urban Zone Provisions.
34. Kāinga Ora seeks the following changes to the PDP:
 - (a) Kāinga Ora seeks a zoning framework that will enable medium density housing around the Town Centre Zones (approximately 400m proximity in all locations other than Rolleston where Kāinga Ora considers an approximate 800m MDR catchment appropriate)). Kāinga Ora seeks the introduction of a Medium Density Residential Zone (“MRZ”) in these areas. Kāinga Ora considers that this will provide targeted locations for increased residential density rather than relying on enabling this through the other residential zones. Provisions for the proposed MRZ are included at **Attachment 2**. The proposed residential zones and spatial extent do not sufficiently enable residential growth and intensification at a scale and form that is appropriate and necessary to reflect

the requirements of the NPS-UD; and do not sufficiently encourage housing choice that is necessary to support the social and economic demands of Selwyn.

- (b) Kāinga Ora seeks changes to the objectives and policies of the PDP to focus on achieving the planned urban built form of the proposed zones, noting that in achieving the strategic objective of a 'compact urban form', the character and amenity of the urban areas will change. This requested change is consistent with language used in the NPS-UD.
- (c) Kāinga Ora supports minimum lot sizes in the residential zones in where it applies only to *vacant* lot subdivision. Support is also noted for the explicit recognition that subdivision should be enabled around developments approved by land use resource consents.
- (d) Kāinga Ora seeks greater application of notification exclusions within the PDP. Kāinga Ora seeks notification exclusions for residential development in the MRZ where specific performance standards are met. In this way, greater certainty is given to the development as a whole. In this regard, Kāinga Ora seeks changes to PDP whereby any development that meets the anticipated planned urban built form of the zone is able to be considered without public or limited notification or the need to obtain the written approval from affected parties unless the Council decides that special circumstances exist under section 95A(4) of the Resource Management Act 1991.
- (e) Kāinga Ora supports the use of a restricted discretionary activity framework as a means to assess the potential adverse effects of non-compliance with well understood 'bulk and location' rules / standards such as building height, height in relation to boundary and yard setback controls. A restricted discretionary activity assessment framework provides both clarity and certainty to users of the Plan as to the development / built form outcomes which are sought, and the specific matters Council will assess development applications against as a means to achieving these outcomes.
- (f) Kāinga Ora also seek a public and limited notification preclusion clause for activities for district-wide activities, particularly for earthworks and transport matters, where resource consent is required for solely those matters and where they are associated with a residential activity. Kāinga Ora are of the viewpoint that residential activities only warrant notification where there are affected persons in relation to boundary activities. In this regard, Kāinga Ora seeks changes to PDP whereby any development that meets the anticipated planned urban built form of the zone is able to be considered without public or limited notification or the need to obtain the written approval from affected parties unless the Council decides that special circumstances exist under section 95A(4) of the Resource Management Act 1991.
- (g) Kāinga Ora seeks deletion of the provisions for "comprehensive development" and "small site development" along with consequential changes to the provisions. Kāinga Ora considers the approach taken in the residential zones

within the PDP toward this form of housing is overly complex and does not sufficiently enable intensification as development is still ultimately subject to a density requirement. Kāinga Ora seeks simplification of the provisions that enable medium density housing developments.

- (h) Related to this, Kāinga Ora seeks amendment to introduce a threshold at which point resource consent is required in the GRZ and MRZ– basing this on proposals for three or more residential units. In the commercial zones, Kāinga Ora seeks no limiting threshold for residential development – noting this activity should simply be enabled as a Permitted Activity, subject to meeting performance standards. Kāinga Ora is also seeking changes to the proposed bulk, location, site coverage and matters of discretion within the residential zones to sufficiently address the likely impacts on amenity values while providing for a range of housing typologies.
- (i) The Town Centre, Local Centre and Neighbourhood Centre zone provisions are generally supported. Kāinga Ora considers that this hierarchy is important in recognising and providing for a range of centres of varying scales that will support residential intensification.
- (j) Kāinga Ora opposes the ‘Building Height’ development standards of the Town Centre Zone and Local Centre Zone as proposed. Kāinga Ora seeks an increase in the permitted heights in these zones to better provide for design flexibility, as well as to better enable the delivery of intensification at a variety of different scales and typologies.
- (k) Kāinga Ora broadly supports the Council’s risk-based approach to natural hazards and the mapping of natural hazard areas as this provides clarity for landowners and land developers. Furthermore, Kāinga Ora support the mapping of these natural hazard areas where these areas are underpinned by robust technical assessments; however, Kāinga Ora opposes the inclusion of flooding hazards as Natural Hazard Overlays within the PDP. Flooding hazards are dynamic and subject to constant change through hazard mitigation works and reshaping of ground contours. An alternative relief is proposed. Spatial identification of flood hazard areas, including high flood hazard areas, should be made available through a set of non-statutory flood hazard maps, which would operate as interactive maps on the Council’s GIS website – thereby operating as a separate mapping viewer to the statutory DP maps. This approach is different to that of the traditional means of displaying hazard overlays on district plan maps and reflects that these maps do not have regulatory effect. The advantage of this approach is the ability to operate a separate set of interactive maps which are continually subject to improvement and updates, outside of and without a reliance on the Schedule 1 Resource Management Act 1991 process. Kāinga Ora notes that this is an approach taken by other Councils around the country.
- (l) As proposed, in relation to flooding, the PDP definition of high hazard area relies on expert advice to determine whether the site is subject to a certain

depth or velocity of water in a particular flood event. This is different to the Waimakariri Flood overlay and coastal hazards overlays, where the entire overlay is included, and as a consequence the overlay is mapped. Given the extensive coverage of the proposed Flood Plains Management Overlay, it is likely that the majority of properties will need to be further investigated as to whether they are also a 'high hazard area'. Kāinga Ora considers that the Council is best placed to identify these areas on a map or through a GIS mapping tool, using a consistent methodology and model, rather than placing the burden on individual landowners or developers and identifying these areas in a piecemeal manner.

- (m) Kāinga Ora seeks all coastal hazards rules and standards to be located within the Coastal Environment Chapter. As proposed, there are provisions for coastal hazards within the Natural Hazards Chapter. Kāinga Ora opposes this approach, as it is inconsistent with the National Planning Standards. Kāinga Ora supports consistency of plan structure throughout New Zealand.
- (n) Kāinga Ora seeks all earthworks rules and standards to be located within the Earthworks Chapter. As proposed, there are various earthworks provisions, rules, and standards throughout various district wide chapters and overlays. Kāinga Ora opposes this approach, which makes navigation of the Plan and determining compliance cumbersome and prone to error.
- (o) The PDP includes a number of transport provisions that will constrain residential development. Kāinga Ora opposes the transport provisions in the current proposed state and seeks the full package of provisions (objectives, policies, rules and standards) are reviewed and amended so that they work together as a package and appropriately manage the safety and efficiency of the transport network, while recognising and providing for residential intensification. Kāinga Ora seeks the review of this table and consequential amendment so that the requirements are more appropriately set to effectively manage the safety and efficiency of the transport network and support cycling, while recognising and providing for residential intensification.
- (p) Kāinga Ora notes that the PDP has adopted a substantial number of definitions from the National Planning Standards, and it supports this approach. However, the PDP includes a number of additional definitions, and Kāinga Ora considers that amendments are required to a number of proposed additional definitions introduced in the PDP.
- (q) Kāinga Ora considers that the provisions of the National Grid Corridor are overly restrictive and do not efficiently manage sensitive activities within close proximity to and under the National Grid. Kāinga Ora opposes the National Grid provisions in its current proposed state and seeks the full package of provisions (objectives, policies, rules and definitions), including the spatial extent of the corridor overlay as shown in the PDP is deleted and updated with more suitable controls.
- (r) While Kāinga Ora recognises the need to ensure residential units and other

buildings containing sensitive activities provide a pleasant and healthy environment that is not subject to excess noise, Kāinga Ora opposes the provisions of land use adjacent to the Railway corridor and considers these to be overly restrictive and do not efficiently manage activities within close proximity to the Railway. Kāinga Ora considers addressing the potential reverse sensitively effect should be the responsibility of the noise generator, rather than an individual building owner or developer. Kāinga Ora opposes the associated noise provisions in its current proposed state and seeks the full package of provisions (objectives, policies, rules and definitions) are reviewed and amended.

- (s) Similarly, Kāinga Ora considers that the provisions of land use adjacent to the State Highway network are overly restrictive and do not efficiently manage activities within close proximity to the State Highway. Kāinga Ora opposes the associated noise provisions in its current proposed state and seeks the full package of provisions (objectives, policies, rules and definitions) are reviewed and amended.

Proposed Spatial Extent / Application of the zones District-wide

- 35. As noted above, Kāinga Ora opposes the spatial application of the two main proposed residential zones – GRZ and LDRZ – across the District on the basis that they do not enable sufficient residential intensification. Kāinga Ora seeks that a MRZ be applied around centres across the District, and upzoning of some LDRZ to GRZ (refer to **Attachments 3 and 4**).
- 36. Kāinga Ora considers that the spatial application of this MRZ should be generally based upon the availability of, and proximity to, various commercial and community facilities (e.g., commercial centres, community facilities, schools, reserves and open space as well as schools etc.) as well as the public transport network. As a result, Kāinga Ora seeks the application of MDRZ, or amended zoning from LDRZ to GRZ as set out in in **Attachments 3 and 4**, based on national directions set out in the NPS-UD relating to proximity to supporting amenities and facilities. The proposed areas for rezoning are located within catchment areas reflecting the zoning principles discussed below.
- 37. The key aspects of the principles applied by Kāinga Ora in the proposed rezonings seek to provide for and enable further opportunities for medium density residential intensification, generally within approximately an 800m (10min) walkable catchment from several Town/Local Centres and within approximately a 400m (5min) walk of public transport routes, and proximity to, various commercial and community facilities (e.g. commercial centres, community facilities, schools, reserves and open space as well as schools etc.). Kāinga Ora submits that these principles should generally apply in determining the zoning of land for medium density development under the PDP.
- 38. Kāinga Ora generally supports the spatial zoning of Local Centre, Neighbourhood Centre and the Mixed Use zoned areas, but suggests some upzoning for some towns as set out in **Attachments 3 and 4**. Kāinga Ora considers that these areas provide

opportunities for employment and business activities that will meet the commercial needs of the District and will assist in supporting the surrounding residential community. For consistency, Kāinga Ora generally requests that Medium Density Residential zoning be applied around a walkable catchment of each Town Centre in the District, but acknowledges this may not be appropriate in some locations, for example Leeston. On this basis, Kāinga Ora also seeks that the Council reconsider the Town Centre zoning for some centres, and whether this is appropriate based on their population and location in terms of a centres hierarchy. In all cases, Kāinga Ora notes that any up-zoning will need to be cognizant of natural hazards (minimizing intensification in a high hazard area) and have suitable servicing/infrastructure capacity, including reticulated wastewater.

39. Kāinga Ora supports the principle of identifying appropriate land for future urban use but considers that it is more appropriate and consistent with the National Planning Standards to identify this using the Future Urban Zone (“**FUZ**”) rather the Urban Growth Overlay. Kāinga Ora has prepared a version of the FUZ provisions, appended at **Attachment 5**.
40. It is also noted that the extent of the Urban Growth Overlay/FUZ locations may be impacted by land use constraints, for example, prime or elite soils (in the case of south east Rolleston). Kāinga Ora seeks that the council ensure that any future growth areas are not subject to land use constraints that will constrain their future development (for example as potentially highly productive land), and if it is found that the areas identified as FUZ may be impacted, that alternative locations are identified through the PDP process. Kāinga Ora acknowledges that the Council is currently constrained by the boundaries identified in Map A of the Canterbury Regional Policy Statement (the “**CRPS**”).
41. Kāinga Ora seeks the following decision from Selwyn District Council on the PDP:
 - (a) That the proposed provisions of the PDP be deleted or amended, to address the matters raised in this submission and its attachments so as to provide for the sustainable management of the District’s natural and physical resources and thereby achieve the purpose of the Act; and
 - (b) Such further or other relief, or other consequential or other amendments, as are considered appropriate and necessary to address the concerns set out herein.
42. Kāinga Ora does not consider it can gain an advantage in trade competition through this submission.
43. Kāinga Ora wishes to be heard in support of this submission.
44. If others make a similar submission, Kāinga Ora would be willing to consider presenting a joint case with them at a hearing.

Dated this 11th day of December 2020

KĀINGA ORA - HOMES AND COMMUNITIES by



Brendon Liggett
Development Planning Manager
Urban Development – Delivery

ADDRESS FOR SERVICE:

Attn: Brendon Liggett
Development Planning Team
Kāinga Ora – Homes and Communities
PO Box 74598
Auckland 1546
Email: developmentplanning@kaingaora.govt.nz

Copy to: Barker & Associates
 PO Box 1986
 Shortland Street
 AUCKLAND 1140
 Attention: Nick Roberts
 Email: nickr@barker.co.nz