

1. MATTERS ADDRESSED

1.1 These submissions are filed on behalf of Kāinga Ora – Homes and Communities (**Kāinga Ora**) in relation to Hearing Stream 4 – Urban Development. Kāinga Ora has lodged evidence in Hearing Stream 4 by:

(a) Brendon Liggett (Corporate);

(b) Tim Heath (Economics);

(c) Matt Heale (Planning).

1.2 Attached to these submissions is a table summarising Kāinga Ora's position on matters addressed in the s 42A reporting.

1.3 Kāinga Ora considers that the RPS would do better to classify a greater number of locations within the Centres Hierarchy (policy 30).

2. CENTRES HIERARCHY

2.1 Under s 59, the purpose of a regional policy statement is to achieve the purpose of the Act by providing an overview of the resource management issues of the region and policies and methods to achieve integrated management of the natural and physical resources of the whole region.

2.2 As Wellington's housing and business markets operate regionally, this is a fundamental concern of the RPS. The RPS should provide for integrated management of centres: in this instance, that means directing provision for intensification around centres with specific characteristics in a consistent way. As Mr Heath says:

3.5 I consider that the continued economic development of the City Centre, and the wider centre network, requires competitive changes to occur. It is now, more than ever, crucial that the economic environment within the Region's hierarchy is as competitively and efficiently managed as possible. Business location, residential intensification and the consolidation of activity in centres is key in the creation of this environment, a well-functioning urban environment and an efficient commercial centre network across the Region.

- 3.6 Overall, the identified centres, being the foremost commercial hubs of the Region and most economically efficient location for built form density to occur, should have the highest enabled height thresholds, followed by a staggered approach down as you move down the centre hierarchy. This is to ensure relative competitiveness between zones and centres so intensive development has a higher propensity to occur in the most economically efficient locations and significant economic benefits to the community can be realised.
- 2.3 Because territorial authorities are required to give effect to a regional policy statement (s 75(3)), it is important that the RPS takes a comprehensive and clear position about the centres in which intensification must occur, and provides some parameters around the appropriate approach to walkable catchments.
- 2.4 The starting point for Kāinga Ora's position is Objective 3 of the NPS-UD:
- Objective 3:** Regional policy statements and district plans enable more people to live in, and more businesses and community services to be located in, areas of an urban environment in which one or more of the following apply:
- (a) the area is in or near a centre zone or other area with many employment opportunities
 - (b) the area is well-serviced by existing or planned public transport
 - (c) there is high demand for housing or for business land in the area, relative to other areas within the urban environment.
- 2.5 Policy 3 follows this objective and directs building heights and densities according to accessibility (eg, walkable catchments) to rapid transit services or categories of centre defined by the National Planning Standards:¹

¹

National Planning Standards, Part 8 Zone Framework Standard, Table 13.

Town centre zone	<p>Areas used predominantly for:</p> <ul style="list-style-type: none"> • in smaller urban areas, a range of commercial, community, recreational and residential activities. • in larger urban areas, a range of commercial, community, recreational and residential activities that service the needs of the immediate and neighbouring suburbs.
Metropolitan centre zone	<p>Areas used predominantly for a broad range of commercial, community, recreational and residential activities. The zone is a focal point for sub-regional urban catchments.</p>
City centre zone	<p>Areas used predominantly for a broad range of commercial, community, recreational and residential activities. The zone is the main centre for the district or region.</p>

- 2.6 The NPS-UD requires territorial authorities to have a future-focused approach to plan-making, by assessing and enabling sufficient realisable development capacity in the short, medium and long terms, long term being defined as between 10-30 years.
- 2.7 It follows that identification of where in the hierarchy each location should sit should not be based on current metrics relating to the performance of a particular location. It should be based on future capacity demands and factors anticipating growth, such as accessibility (for example, via current or planned rapid transit services). Councils have to plan for emerging centres and zone for building heights and densities accordingly.
- 2.8 For the reasons expressed by Kāinga Ora's three witnesses, the amendments proposed by Mr Heale to policy 30 ought to be recommended by the Panel as better giving effect to the NPS-UD.

Date: 15 September 2023



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Nick Whittington