

UNDER the the Resource Mangement Act 1991 ("RMA")
IN THE MATTER of Proposed Waikato District Plan (Stage 1)

**LEGAL SUBMISSIONS ON BEHALF OF HOUSING NEW ZEALAND
CORPORATION (749, FS1269)**

OPENING SUBMISSIONS

26 September 2019

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MAY IT PLEASE THE HEARINGS PANEL:

1. Introduction

1.1 These opening submissions are presented on behalf of Housing New Zealand Corporation (“**HNZC**”) in relation to its submissions (749 and FS1269) on the Proposed Waikato District Plan (“**the Proposed District Plan**” or “**PDP**”). In summary, HNZC is generally supportive of Waikato District Council’s (“**the Council**”) strategy for accommodating growth. However, it considers that the notified zoning maps, plan provisions and rules do not implement that strategy adequately.

1.2 These submissions are structured as follows:

- (a) Background to HNZC.
- (b) The reasons for HNZC’s submission on the PDP.
- (c) A summary of HNZC’s submissions on the PDP, and the reasons for these submissions.
- (d) A brief consideration of the relevance of the National Policy Statement on Urban Development Capacity 2016 (“**NPS-UDC**”) and the recently proposed National Policy Statement on Urban Development (“**NPS-UD**”) to these hearings.

2. Background to HNZC

2.1 HNZC was formed in 2001 as a statutory corporation established under the Housing Corporation Act 1974 (as amended by the Housing Corporation Amendment Act 2001). It is also a Crown agency under the Crown Entities Act 2004.

2.2 HNZC’s statutory objectives are to give effect to the Government’s social objectives by providing housing and related services. To this end:

- (a) HNZC owns or manages more than 64,000 rental properties throughout New Zealand¹, including almost 1,500 homes for

¹ As at June 2019.

community groups that provide housing services. Approximately 40% of the total state housing portfolio was built before 1967.

- (b) HNZC has over 185,000 people occupying HNZC tenancies.²
- (c) HNZC manages a portfolio of almost 400 dwellings in the Waikato district.³

2.3 The Housing Corporation Act 1974 sets out HNZC's functions to provide housing and housing-related services to support the Crown's social objectives.⁴ Under the Crown Entities Act 2004, HNZC is listed as a Crown agent and is required to give effect to Government policies.

2.4 HNZC works within a community of government, charitable and private sector organisations to provide social housing and housing support throughout New Zealand.

2.5 HNZC's tenant base is characterised by lower income households, with over 90 percent of tenants paying a subsidised income-related rent. A third of HNZC's tenants identify as Maori (compared with approximately 15% of the general population) and a quarter of tenants identify themselves as Pacific peoples (compared with 7.4% of the general population).

2.6 There has been a marked change in the type of social housing that is required by HNZC's 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 do not match the changing demand for social housing, with a large proportion of the HNZC's housing stock comprising older 2-3 bedroom homes

² Housing New Zealand, Annual Report 2017/2018.

³ As at June 2019.

⁴ The Housing Corporation Act 1974 will be repealed by the Kāinga Ora-Homes and Communities Act 2019, which comes into force on 1 October 2019.

on large lots which are too large for smaller households and too small for larger households.

- (c) This has meant that HNZC 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.

2.7 HNZC has a long-term Asset Management Strategy which is focused on providing houses that are the right size, in the right place and in the right condition. As such, HNZC has been involved in a number of redevelopment projects that have amalgamated sites to allow for more efficient use of HNZC stock, or to use single sites more effectively.

Kāinga Ora—Homes and Communities.

2.8 The Kāinga Ora-Homes and Communities Act 2019 (“**the Kāinga Ora Act**”) comes into force on 1 October 2019. The Kāinga Ora Act disestablishes HNZC and transfers its functions to a new Crown agency, Kāinga Ora-Homes and Communities (“**Kāinga Ora**”).

2.9 Kāinga Ora consolidates the three existing centres of development capability (HNZC, HLC 2017 Ltd and parts of the KiwiBuild Unit) and will be the Government’s delivery agency for housing and urban development.⁵ Once established, Kāinga Ora will work 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 will have two core roles:

- (a) being a world class public housing landlord; and
- (b) leading and co-ordinating urban development projects.

2.10 In addition to bringing together HNZC, HLC 2017 Ltd and parts of the KiwiBuild Unit, the Kāinga Ora Act sets out the operating framework for Kāinga Ora. A separate bill will be introduced later this year which is intended to give Kāinga Ora its enabling development powers for large

⁵ Hon Phil Twyford, Bill to set up urban development authority introduced. 29 May 2019.

and complex urban development projects called specified development projects.⁶

2.11 Further detail on the objectives, functions and principles of Kāinga Ora will be provided in corporate evidence to be lodged in Hearing 3.

3. Background to HNZN's Submissions on the Proposed District Plan

3.1 HNZN will provide corporate evidence in a subsequent hearing which will outline its intent in respect of the provision of housing within Waikato District. As outlined above, however, HNZN manages a portfolio of almost 400 dwellings within the Waikato District. HNZN's tenants are people who face barriers (for a number of reasons) to housing in the wider rental and housing market.

3.2 HNZN has a directive to provide efficient and effective affordable and state housing for the most vulnerable members of our society. This responsibility drives HNZN's strategic goals of reconfiguring its portfolio to meet regional demand, and of reducing deprivation levels in communities with a high state housing presence. These goals require HNZN to have the ability to construct and develop quality social housing and to maintain this housing in a manner that:

- (a) Provides healthy, comfortable and fit-for-purpose housing to people in need, for the duration of their need; and
- (b) Improves the diversity and effectiveness of state housing in the Waikato District to meet the changing needs of our communities and aligns the state housing portfolio with demographic trends and demand.

3.3 HNZN's submissions on the PDP reflect the importance that the residential provisions, the spatial application of the zones, and the removal of unnecessary barriers to consent, have to HNZN in terms of its ability to achieve the above in an efficient and effective manner.

3.4 As outlined in section 2, HNZN currently faces significant challenges in that the demand for state housing has changed markedly from the 2-3

⁶ Hon Phil Twyford, Bill to set up urban development authority introduced. 29 May 2019.

bedroom houses on large lots that were built in the 1930's and 1940's, to single unit housing and 4-5 bedroom homes. This contrasts with HNZN's current housing portfolio of which the majority is of the 2-3 bedroom typology on large lots.

- 3.5 In order to provide houses that are the right size, in the right place and in the right condition, HNZN looks to redevelop existing sites, using them more efficiently and effectively in order to improve the quality and quantity of state and affordable housing available. When redeveloping its portfolio, HNZN looks to make better use of land that has reasonable access to public transport, commercial centres, community services and facilities (such as public open space, educational facilities, or other social infrastructure), or other areas of employment.
- 3.6 While HNZN is in a unique position in that its size and extensive land holdings means it (more readily than private developers) can give effect to the vision for intensification because of its ability to amalgamate and develop land holdings, the residential zone provisions (and critically, their spatial application) are of significant importance to HNZN in terms of its ability to reconfigure its portfolio to provide new and additional housing supply that is of improved quality and is better matched to current and future demand.
- 3.7 In that regard, HNZN considers there is significant potential to better use land across Waikato District. In particular, HNZN believes there is a significant opportunity to redevelop its land holdings to increase intensity and variety of housing types, and free-up under-utilised land for private, affordable and third-sector housing for the benefit (social and economic wellbeing) of the whole community. For the reasons outlined below, however, there are a number of additional methods and rules which HNZN considers are required in order to better respond to the desired development opportunities and outcomes for the Waikato District.

4. Housing NZ's Submissions on the PDP

Summary of HNZN's Submissions on the PDP

- 4.1 Due to HNZN's operational and development requirements, its interest in the PDP is broad. For that reason, HNZN has made submissions on a wide range of PDP provisions, including provisions relating to district

growth, residential development, business and rural activities, subdivision, heritage, transport, utility services, and natural heritage. In addition, HNZN has sought amendments to the spatial application and extent of the proposed zones and overlays in the PDP.

- 4.2 HNZN's concern, reflected in its submissions, is that the provisions of the PDP as notified do not sufficiently provide for the significant growth pressures that the urban areas of the Waikato District are expected to face.⁷ In particular, HNZN is concerned that the PDP provisions, particularly the zoning and rules proposed, are not the most appropriate way to achieve the residential and economic growth goals of the Waikato Regional Policy Statement. This is particularly the case in respect of provisions relating to use, development and subdivision within the proposed residential zones of the PDP (Residential and Village zones).
- 4.3 As identified in the s32 report, the topic of strategic direction and management of growth is perhaps the most significant issue that the PDP addresses.⁸ In HNZN's submission, it is particularly important that increased capacity is enabled in proximity to amenities and other attributes throughout the Waikato District (e.g.: in proximity to social infrastructure (schools and open space), employment opportunities and transport links) so as to facilitate the provision of an efficient urban form and the coordinated growth of the District. In particular, HNZN considers that providing opportunities for increased residential densities in such location is important because it:
- (a) Supports the wider social and economic wellbeing of residents (e.g.: by providing accessibility to employment, social services and transport);
 - (b) Enables future residential development and growth of the district to make efficient use of existing resources and reduces potential adverse impacts associated with housing provision in less proximate areas (e.g.: increased reliance on private vehicle travel for commuting and increased costs of travel for residents);

⁷ As set out in the Future Proof Growth Strategy and the Waikato RPS.

⁸ Section 32 Report – Part 2, Strategic Direction and Management of Growth at section 1.1.

- (c) Supports the potential for delivery of a variety of housing typologies and more affordable housing stock in suitable locations; and
 - (d) Supports the strategic directions and objectives of the PDP which seek to achieve a more concentrated urban form over the next 30 years in the Waikato district.
- 4.4 While HNZN considers the amendments proposed by the Council as part of the PDP are a step in the right direction, they do not sufficiently provide for the increased opportunity for redevelopment or the compact urban form which HNZN considers is necessary to appropriately respond to the District's growth issues.
- 4.5 To that end, HNZN has sought amendments to both the spatial extent of the residential zones and their proposed provisions so as to better enable residential growth and intensification in appropriate areas and to support the provision of a compact urban development model. Set out below is a summary of HNZN's key submission points, which will be addressed in more detail in future hearing topics.

Amendments to the Spatial Extent of the Zoning

- 4.6 HNZN considers that the spatial application of the zoning provisions is key to ensuring that the long-term residential development capacity needed to meet the population growth expected in the Waikato can be met and that the Region's growth can be appropriately provided for in a coordinated manner which achieves a compact urban form settlement pattern.
- 4.7 In that regard, HNZN considers that the proposed spatial application of the Residential and Village Zones do not sufficiently enable residential intensification.
- 4.8 For that reason, HNZN's submission sought that a new Medium Density Residential Zone be applied around key centres and urban settlements as follows:⁹

⁹ See Submission Points 749.153 (Amending extent of Residential Zone, Village Zone and Rural Zone) and 749.1 (Application of new Medium Density Residential Zone)

- (a) Within 5min (400m) walkable catchments from the Council's newly proposed locations for the Residential Zone/Village Zone in Raglan, Taupiri and Te Kauwhata; and
 - (b) Within 10min (800m) walkable catchments from the Council's newly proposed locations for the Residential Zone/Village Zone in Huntly, Pokeno, Tuakua and Ngaruawahia, as well as the train stations situated either within or close to these locations.
- 4.9 HNZC's submission follows a consistent approach which it has put forward through other similar plan review / plan change process (albeit at different scales), including through the Auckland Unitary Plan submissions and hearings process, as well as more recently through submissions to Hutt City Council and Whangarei District Council in relation to their respective plan change and plan review processes. It is an approach based on best practice urban design and planning principles as they relate to medium density residential intensification of existing urban areas, and an approach now endorsed by the recently proposed NPS-UD.
- 4.10 This approach identifies where opportunity for medium density development may be appropriate and where urban intensification outcomes can be enabled (acknowledging that there will be other considerations which may result in limitations to these opportunities e.g. natural hazards, heritage or other significant values, and that simply rezoning land will not result in immediate change of land use or uptake of redevelopment opportunities).
- 4.11 HNZC considers that an increase in the extent of rezoning would allow for better provision of housing capacity and choice more flexibly and efficiently and across a larger part of the Waikato District's urban area, would assist the Council in ensuring that affordable and varied housing options are available to communities as the district grows, and would facilitate the provision of a more efficient urban form.

Proposed Plan Change Provisions

- 4.12 HNZC's submission also proposed changes to a number of the provisions of the PDP which it says act in concert to unnecessarily constrain growth across the District. Again, these matters will be

explored in greater detail in later hearings, however, in summary HNZN considers that:

- (a) The proposed residential zone provisions are not sufficiently enabling of intensification. As such, it has sought the introduction of a new Medium Density Residential Zone which would enable apartments, terrace housing and multi-unit developments.¹⁰
- (b) The current proposed residential zone provisions do not encourage sufficient housing choice and variety in residential built form to support changing demographics, lifestyles and population growth. For example:
 - (i) There is no differentiation in height, bulk and density controls for residential activities in the Residential and Village zones. As such, HNZN has sought amendments to the residential zone¹¹ and urban subdivision¹² provisions, as well as amendments to consent triggers¹³, to better enable residential intensification at different scales and typologies.
 - (ii) The provisions for building a second dwelling on site or multi-unit developments are restrictive and discourage the desired urban uplift sought in the district. Currently, for example, the proposed provisions require any type of in-fill housing development or multi-unit development to apply for consent. As such, HNZN has sought

¹⁰ *Addition of a new zone:* Submission points 749.107 (Objectives and Policies), 749.124 (Land Use and Subdivision Provisions), 749.125 (Amendments to Chapter 16).

¹¹ *Amendments to Residential Zone standards, for example:* Submission points 749.89 (Height – Building general); 749.87 (Dwelling); 749.88 (Minor Dwelling), 749.109 (Daylight admission), 749.111 (Living Court), 749.112 (Service Court), 749.113 (Building setbacks), 749.110 (Residential Zone, Building Coverage).

¹² *Amendments to Residential Zone subdivision standards, for example:* Submission points 749.118 (Subdivision – General), 749.120 (Subdivision – Boundary adjustments), 749.121 (Subdivision – Road frontage), 749.122 (Subdivision – Building platform).

¹³ *Amendments to Residential Zone activity status/assessment criteria, for example:* Submission points 749.118 (Residential Zone, Subdivision – General), 749.82 (Residential Zone, Activity not otherwise provided for), 749.87 (Dwelling), 749.110 (Residential Zone, Building Coverage), 749.111 (Living Court), 749.112 (Service Court), 749.118 (Subdivision – General), 749.81 (Residential Zone, Permitted Activities not complying with Rules 16.2 or 16.3).

amendments to the zone¹⁴, subdivision¹⁵ and multi-unit development¹⁶ provisions as well as consent triggers¹⁷ to facilitate the provision of variety in built form.

- (iii) More generally, HNZC has sought amendments to the zone¹⁸, subdivision¹⁹, transportation²⁰ and consent triggers/matters of discretion²¹ as a means of better enabling and incentivising residential development in the district.
- (iv) There is a lack of clarity around the provisions²² and definition of multi-unit development in PDP, particularly around what is considered a multi-unit development, which it considers will create unnecessary complexities and interpretation issues in future processing of consents.

¹⁴ *Amendments to Residential Zone standards, for example:* Submission points 749.88 (Minor Dwelling), 749.87 (Dwelling).

¹⁵ *Amendments to subdivision standards, for example:* Submission points 749.119 (Residential Zone, Subdivision – Multi Unit Development), 749.132 (Business Zone, Subdivision – Multi unit development).

¹⁶ *Amendments to the multi-unit development standards, for example:* Submission points 749.80 (Residential Zone) 749.127 (Business Zone), 749.135 (Business Town Centre Zone), 749.146 (Business Town Centre Zone, Subdivision – Multi unit development).

¹⁷ *Amendments to activity status/assessment criteria, for example:* Submission points 749.80 (Residential Zone – Multi unit development), 749.87 (Dwelling), 749.132 (Business Zone, Subdivision – Multi unit development), 749.146 (Business Town Centre Zone, Subdivision – Multi unit development), 749.119 (Residential Zone, Subdivision – Multi Unit Development).

¹⁸ Refer footnote 11 above for amendments to standards in the residential zones.

¹⁹ *Amendments to subdivision standards in non-residential zones, for example:* Submission points 749.145 (Business Town Centre Zone, Subdivision – General), 749.147 (Business Town Centre Zone, 18.4.2 Subdivision – Boundary adjustments).

²⁰ *Amendments to transportation standards, for example:* Submission points 749.78 (Infrastructure and Energy Chapter – Access and Road Conditions).

²¹ *Amendments to activity status/assessment criteria in non-residential zones, for example:* Submission points 749.145 (Business Town Centre Zone, Subdivision – General), 749.72 (Infrastructure and Energy Chapter – Access and Service connections for subdivision). Refer footnote 13 above for examples of amendments to consent triggers for residential zones.

²² *Amendments to policies and definitions related to multi-unit development, for example:* Submission points 749.56 (Definition – Multi Unit Development), 749.2 (Urban Environment, Multi-unit Development and Outdoor living court – Multi-unit development). Also 749.142 (Application of Display window and building facade in the Business Town Centre Zone to Multi-unit development).

- (v) Specifying a maximum density requirement for multi-unit development acts only to disincentivise and discourage such development (which otherwise enables a range of typologies to be provided) and is unnecessary in circumstances where the bulk, location, site coverage and assessment criteria sufficiently address likely impacts on amenity values.²³
- (c) The proposed National Grid provisions are overly restrictive and do not efficiently manage sensitive activities within close proximity to and under the National Grid, resulting in growth in some areas being unnecessarily constrained.²⁴
- (d) The proposed Building Height²⁵ and Daylight Admission²⁶ standards of the Business Zone and Business Town Centre Zone do not provide for sufficient design flexibility and do not facilitate the delivery of centre intensification (including residential intensification) at a variety of scales and typologies. The Business Zones should appropriately enable opportunities residential development.²⁷
- (e) The proposed car parking requirements for residential zones do not provide an appropriate balance between the needs and

²³ *Amendments to the multi-unit development standard in the Residential Zone, for example:* Submission point 749.80.

²⁴ *Amendments to provisions and maps relating to the National Grid, for example:* Submission points 749.24 (Section 6.2 and Overlay Maps); 749.73 (Section 4.4 and Overlay Maps); 749.155 (Objectives, Rules, Definitions and Overlays relating to the National Grid). Note: HNZN has raised similar issues with respect to building setbacks for sensitive land use (749.114-749.115) addressed in Hearing 2 EIC, Matt Lindenberg (Planning) for HNZN at paras 5.10-5.15.

²⁵ *Amendments to Height standard and/or activity status, for example:* Submission points 749.129 (Business Zone), 749.140 (Business Town Centre Zone).

²⁶ *Amendments to Daylight Admission standards, for example:* Submission points 749.130 (Business Zone), 749.141 (Business Town Centre Zone).

²⁷ *Amendments to the Business Zone and Business Town Centre provisions (incl consent triggers), for example:* Submission points 749.134 (Business Town Centre Zone, Residential Activity), 749.135 (Business Zone, Multi-unit development), 749.136 and 749.137 (Business Town Centre Zone, Residential Activity on the ground floor and multi-unit development on the ground floor), 749.143 (Business Town Centre Zone, Dwelling), 749.144 (Business Town Centre Zone, Living Court), 749.6 and 749.6 (Business Town Centre Zone Policies 4.5.3 and 4.5.11), 749.131 (Business Zone, General subdivision), 749.132 (Business Zone, Subdivision – Multi unit development), 749.133 (Business Zone, Subdivision – Boundary adjustments).

provision of parking on residential sites and are likely to have undesirable implications with regard to the efficient use of land to provide for residential growth and intensification.²⁸

(f) Design guidelines and Town Centre Character Statements should be treated as non-statutory documents which sit outside of the Plan and guide design and development:

(i) While HNZC generally supports design guidelines for residential subdivision, multi-unit development and town centres, it considers they should be used by Council only to provide guidance regarding best practice design outcomes and treated as non-statutory documents to inform design and development. Requiring development proposals to comply with these guidelines in all circumstances (e.g. by requiring that a design statement be provided with every development) is inefficient and overly onerous. For these reasons, HNZC has sought their deletion.²⁹

(ii) For similar reasons, HNZC opposes the inclusion of Town Centre Character Statements in the PDP and considers that they should be treated as non-statutory documents which sit outside of the Plan and guide design and development.³⁰

4.13 HNZC has also made submissions seeking amendments to a number of the proposed definitions to align them with the first tranche of National Planning Standards³¹ and is of the view that the PDP should also be

²⁸ *Amendments to transportation standards, for example:* Submission point 749.77 (Infrastructure and Energy Chapter – Required parking spaces and loading bays)

²⁹ *For example, deletion of / removal of references to design guidelines:* Submission points 749.3, 749.119, 749.132, 749.135 (multi-unit development urban design guidelines), 749.17, 749.135, 749.158 (town centre urban design guidelines), 749.20, 749.118 (residential subdivision design guidelines), 749.151 (Appendix 3 Design Guidelines).

³⁰ *For example:* Submission points 749.10-749.15 (Remove references in Town Centre policies to Town Centre Character Statements); 749.98-749.106 (Amend Town Centre policies to include desired outcomes from Town Centre Character Statements), 749.158 (Remove reference to Town Centre Character Statements from Town Centre Standards) 749.152 (Delete Appendix 10 Town Centre Character Statements)

³¹ *For example, amendments to Chapter 13 Definitions:* Submission point 749.26.

amended so as to align with the National Planning Standards as they relate to plan content, structure and zone types.³²

5. NPS-UDC and the Proposed NPS-UD

NPS-UDC

- 5.1 The NPS-UDC imposes a series of obligations on councils regarding the provision of sufficient residential and commercial capacity to accommodate future growth, based on an appropriate evidence base.
- 5.2 It is not proposed to review the NPS-UDC in detail, but it is noted that the following are consistent themes within the document:
- (a) Urban environments are expected to change over time.³³
 - (b) Provision of housing capacity and choice:³⁴
 - (c) Integration of land use and infrastructure development.³⁵
- 5.3 Those provisions are forward-looking. They anticipate a dynamic urban environment that is expected to intensify, and hence alter, over time. That is contrary to the historic approach in much of New Zealand, through which planning was concerned to maintain and avoid effects on historic forms and densities of development, and on the status quo.

Proposed NPS-UD

- 5.4 In August 2019 the Government released a discussion paper on the proposed NPS-UD. Whereas the NPS-UDC addresses issues regarding the provision of sufficient capacity to accommodate growth, the intention is that the NPS-UD will address the ways in which that growth should be accommodated in urban areas, including directions to local authorities to enable higher density residential development in specified areas.
- 5.5 The Proposed NPS-UD intends to enable growth by requiring councils to provide development capacity to meet the diverse needs of

³² FS126.92. See Hearing 2, EIC, Matt Lindenberg (Planning) for HNZN at paras 5.16-5.18.

³³ Refer, for example, NPSUDC Preamble page 3 (first bullet point), page 9, Objective OA3.

³⁴ Refer, for example, Objective OA2, Policy PA1, Policy PA3, Policy PC1.

³⁵ Objective OD1, Policy PA3, Policy PA2.

communities, address overly restrictive rules, and encourage quality, liveable urban environments. The aim of the proposed NPS-UD is to encourage more effective urban growth, particularly close to frequent public transport, and walking and cycling facilities. An efficient urban form growth strategy is key to delivering upon this aim of the Proposed NPS-UD.

- 5.6 It is apparent from this document that, over time, expectations regarding the density of development and the range of housing typologies will alter in regional centres, as is currently occurring in major cities. Notably, the Waikato District is identified as a major urban centre and therefore subject to the more challenging requirements of the NPS-UD.
- 5.7 At this stage there is no NPS-UD in place and hence no statutory obligation to have regard or give effect to provisions in such a document. It is likely, however, that the NPS-UD will be approved and in place as a relevant statutory consideration prior to the conclusions of the hearings process for the PDP.³⁶
- 5.8 In HNZC's submission, because this national policy direction will likely be in place at the time decisions are made on the PDP, at which point the PDP will be required to give effect to the NPS-UD, it is important and appropriate for the Panel to anticipate this and to give consideration to the themes of the Proposed NPS-UD through the hearings process to ensure that the PDP has been prepared in accordance with and will appropriately give effect to national policy direction.

DATED this 26th day of September 2019



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³⁶ The Ministry for the Environment's intention is for the proposed NPS-UD to go to Ministers and Cabinet for approval in early 2020 and, if approved, to likely come into force in the first half of 2020 (<https://www.mfe.govt.nz/consultations/nps-urbandevelopment>)