

29th January 2026

Attn: Regional Planning Manager
Greater Wellington Regional Council
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Submission sent via email: regionalplan@gw.govt.nz

KĀINGA ORA – HOMES AND COMMUNITIES SUBMISSION ON GREATER WELLINGTON REGIONAL COUNCIL VARIATION 1 TO PLAN CHANGE 1 TO THE NATURAL RESOURCE PLAN TO THE PROPOSED GREATER WELLINGTON REGIONAL COUNCIL NATURAL RESOURCES PLAN UNDER CLAUSE 6 OF SCHEDULE 1 OF THE RESOURCE MANAGEMENT ACT 1991.

This is a submission on Variation 1 to Plan Change 1 (“PC1”) from the Greater Wellington Regional Council (“the Council” or “GWRC”) on the Natural Resource Plan (“the Plan”).

Scope of submission:

The submission relates to Variation 1 to PC1 of which Kāinga Ora has submitted primary submissions and further submissions. Kāinga Ora supports the variation to Plan Change 1 with minor amendments, and seeks that the variation is given effect to accordingly.

The Kāinga Ora submission is:

1. Kāinga Ora supports variation 1 to PC1 as the variation:
 - a. Minimises barriers that constrain the ability to deliver housing development across public housing, affordable housing, affordable rental and market housing; and
 - b. Provides clearer guidance for both developers and regulators, reducing ambiguity in the application of stormwater provisions; and

- c. Provides practicality during the plan change pause by addressing these implementation issues now. The variation enables development to proceed under clear and workable rules, avoiding unnecessary delays and uncertainty while the broader plan change process is on hold.

2. Kāinga Ora fully supports the proposed variation for the following reasons:

Variation 1 to PC1 – Hydrological Control Rule (Rule WH.R5 and Rule P.R5)

3. Kāinga Ora supports the proposed amendments as they provide a practical and necessary solution to implementation issues relating to stormwater provisions while the wider plan change process is paused. Kāinga Ora acknowledge that the variation is limited to changes to the permitted activity rules P.R5 and WH.R5 (stormwater from new and redeveloped impervious surfaces) and Schedule 30 (collection of financial contributions), and consider these targeted amendments are appropriate.

Kāinga Ora aligns with the view of Council for the following reasons:

- i. Improved clarity and certainty: The proposed amendments provide clearer guidance for both developers and regulators, reducing ambiguity in the application of stormwater provisions. This clarity is essential for ensuring compliance and supporting efficient project delivery; and
- ii. Better alignment with stormwater management objectives: The changes strengthen the connection between permitted activity rules and the overarching objectives of the Natural Resources Plan. This alignment ensures that stormwater discharges are managed in a way that protects water quality and mitigates adverse environmental effects; and
- iii. Practicality during the plan change pause: By addressing these implementation issues now, the variation enables development to proceed under clear and workable rules, avoiding unnecessary delays and uncertainty while the broader plan change process is on hold.
- iv. Kāinga Ora support these amendments which strike an appropriate balance between environmental outcomes and enabling development.

Variation 1 to PC1 – Schedule 30: Financial Contributions

4. Kāinga Ora, in its primary submission, sought amendments to the financial contributions provisions to ensure alignment with comprehensive and progressively

staged developments which consider stormwater impact. These changes were intended to provide clarity and consistency in the application of financial contributions, particularly in relation to infrastructure and development outcomes.

5. Kāinga Ora continues to maintain its original submission, as well as the further submissions lodged in support of this position. Kāinga Ora still seeks an outcome that reflects a fair and equitable approach to financial contributions, consistent with the overarching planning framework and provides for anticipated growth in accordance with the HBA.
6. Kāinga Ora acknowledges and supports in part the proposed provision that defers the payment of financial contributions until the final hearing stream has been resolved. However, Kāinga Ora has concerns regarding the use of a fixed date as the trigger for payment. Rather than relying on a predetermined date, Kāinga Ora seeks that the variation instead aligns the financial contribution requirements with the public notification of decisions on the Plan, consistent with the approach applied to the other rules amended through this variation. Linking the trigger to public notification provides a clearer, plan-based mechanism that supports certainty for both Council and developers, while avoiding the premature or inconsistent application of financial contribution obligations prior to decisions on submissions being formally released.
7. Kāinga Ora considers this interim measure to be an appropriate and efficient solution that maintains flexibility and fairness, while safeguarding the integrity of the final plan outcomes.

Summary

8. Kāinga Ora supports Council's proposed amendments to:
 - a. Ensure that Kāinga Ora can carry out its statutory obligations, including being able to meet the need for social housing through redevelopment of its portfolio;
 - b. Ensures that the proposed provisions are the most appropriate way to achieve the purpose of the Resource Management Act 1991, relevant national direction and regional alignment;
 - c. Reduce interpretation and processing complications for decision makers so as to provide for plan enabled development;
 - d. Provide clarity for all plan users; and
 - e. Allows Kāinga Ora to fulfil its urban development functions as required under the Kāinga Ora – Homes and Communities Act 2019.

Kāinga Ora seeks the following decision from Greater Wellington Regional Council on Variation 1 to PC1:

That the specific amendments as amended through Variation 1 to PC1 are accepted and adopted into PC1.

Kāinga Ora does not wish to be heard in support of their submission.

Kāinga Ora will not gain an advantage in trade competition through this submission.



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Brendon Liggett
Manager - Development Planning
Kāinga Ora – Homes and Communities

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Appendix 1: Decisions sought on Variation 1 to Plan Change

The following table sets out the amendments sought to Variation 1 to Plan Change 1 and also identifies those provisions that Kāinga Ora supports.

Proposed changes are shown as ~~strikethrough~~ for deletion and underlined for proposed additional text.

D	Issue / Provision	PC1 Summary of Changes reference	Kāinga Ora's Position (Support / Oppose)	Reasons for Submission	Relief Sought
1.	Three Waters	Rule WH.R5	Support	As per primary submission.	Retain as notified.
2.	Three Waters	Rule P.R5	Support	As per primary submission.	Retain as notified.
3.	Financial Contributions	Schedule 30: Financial Contributions	Support in part	<p>Kāinga Ora supports the proposed variation in principle. However, Kāinga Ora seeks that the operative date be amended. Instead of the currently proposed date of 1 June, Kāinga Ora requests that the provision take effect upon the public notification of decisions on the plan change.</p> <p>This alternative timing provides greater certainty that the plan change will have been legally and procedurally given effect to, particularly given the deferral of the relevant hearing stream to allow a full understanding of the implications of recent Government direction. Aligning the commencement date with the notification of decisions ensures a clear and defensible transition point and avoids</p>	<p>Kāinga Ora seeks the following amendment:</p> <p>...</p> <p>Financial contributions shall be imposed as a condition of consent. Financial contributions imposed via conditions of consent during the period of 23 October 2023 and 1 June 2027 shall be paid no earlier than 1 June 2027, and no later than 31 December 2027 <u>the date the decisions on submissions to Proposed Plan change 1 for the Natural Resources Plan for the Wellington Region (2023) is publicly notified and within 6 months of notification</u>. Financial Contributions imposed via a condition of consent</p>

				<p>potential confusion or misalignment between statutory processes and plan implementation.</p>	<p>from 02 June 2027 the date the Natural Resources Plan for the Wellington Region (2023) is publicly notified must be paid in accordance with the timeframes detailed within the consent condition.</p>
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