

**BEFORE INDEPENDENT HEARING COMMISSIONERS
AT CHRISTCHURCH**

**I MUA NGĀ KAIKŌMIHANA WHAKAWĀ MOTUHAKE
KI ŌTAUTAHI**

IN THE MATTER of the Resource Management Act 1991

AND

**IN THE MATTER of the hearing of submissions and further
submissions on Plan Change 14 to the
Operative Christchurch District Plan**

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

CORPORATE

STATEMENT 3 – OUTSTANDING CITY-WIDE QUALIFYING MATTERS

16 APRIL 2024

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SUMMARY STATEMENT OF BRENDON SCOTT LIGGETT ON BEHALF OF KĀINGA ORA – HOMES AND COMMUNITIES

1. INTRODUCTION

1.1. My full name is Brendon Scott Liggett. I hold the position of Manager of Development Planning within the Urban Planning and Design Group at Kāinga Ora. I can confirm that I am authorised to give corporate evidence on behalf of Kāinga Ora in respect of PC14.

1.2. My qualifications and experience are outlined in paragraphs 2.2. to 2.4. of my first statement of evidence dated 22 September 2023.

1.3. This is the third statement of evidence on behalf of Kāinga Ora. This statement considers the corporate position on the remaining city-wide qualifying matters following s42a reporting, expert conferencing and rebuttal evidence. These are:

- a) Coastal hazards (including tsunami);
- b) Tree Canopy and Financial Contributions; and
- c) City Spine (Transport) Corridor.

1.4. This statement relies on, where applicable, the evidence and summary statements of the following expert witnesses for Kāinga Ora:

- a) Natural Hazards qualifying matters planning evidence of Mr Tim Joll; and
- b) Tree Financial Contributions planning evidence of Mr Jonathan Cleese;
- c) Tree Canopy Cover Rules landscape architecture evidence of Ms Sophie Strachan.

2. COASTAL HAZARDS

Tsunami Management Area

2.1. ~~Whilst it is agreed that exposure to a high risk of natural hazards is a~~ legitimate qualifying matter, Kāinga Ora is concerned that the proposed

policy approach relating to the Tsunami Management Area is not commensurate with the level of risk and would unduly reduce the ability to develop and deliver public housing in the Tsunami Management Area.

- 2.2. Kāinga Ora notes, and as Mr Joll¹ discusses, the extent of the Tsunami Management Area, being based on a 1:500-year event is not aligned with national direction or higher-level documents. This includes the New Zealand Coastal Policy Statement (NZCPS), which has a specific focus on the 100+ year horizon for risks associated with coastal hazards (including tsunami), and the Canterbury Regional Policy Statement (CRPS) definition of 'High Hazard Areas'.
- 2.3. Kāinga Ora is concerned that classifying a 1:500 year + 1m SLR tsunami as a 'high risk' natural hazard, contrary to all national and regional direction is inconsistent with the s6(h) of the RMA 1991, which seeks to manage 'significant' risks from natural hazards.
- 2.4. Kāinga Ora owns 630 land parcels within the proposed Tsunami Management Area that would be excluded from the benefits of upzoning. This would result in a disproportionate level of lost public housing intensification opportunities including opportunities to provide for a variety of housing typologies and housing choice for the community.
- 2.5. Kāinga Ora remains concerned that there has not been sufficiently robust analysis to support such an impact on not only the Kāinga Ora portfolio, but wider development potential within this overlay. Kāinga Ora considers the costs of the regulation far outweigh the benefits, and that the QM has been applied as a policy decision rather than for valid hazard management purposes.
- 2.6. It is the view of Kāinga Ora that it is more appropriate to base PC14 on current national direction and higher-level documents in a manner similar to other coastal Tier 1 Councils. Kāinga Ora encourages Council to progress the existing draft Coastal Hazards Plan Change

¹ Evidence of Mr Tim Joll on behalf of Kāinga Ora – Homes and Communities, dated 20 September 2023

(PC12) once there is further national direction to support an evidenced risk-based approach to managing these hazards.

3. TREE CANOPY COVER AND FINANCIAL CONTRIBUTIONS

- 3.1. Kāinga Ora promotes vegetation and greenspace through its redevelopment and urban development projects across Christchurch City. This includes through the internal 'Landscape Design Guide for Public Housing 2023'² and an internal Technical Advisory Group, who assess and make recommendations on landscaping and amenity. Kāinga Ora also engages in Urban Design and Planning Clinics with the Council. This demonstrates the value that Kāinga Ora places on quality landscaping outcomes to support well-being.
- 3.2. Notwithstanding this, Kāinga Ora strongly opposes the Tree Canopy Cover Rules and Financial Contributions.

Tree Canopy Cover Rules

- 3.3. Kāinga Ora opposes the Tree Canopy Cover Rules (the Tree CC rules) as these are excessive and inappropriately reduce development opportunities, contrary to the spatial outcome requirements set out in the NPS-UD and the Housing Supply Act. Kāinga Ora considers the required 20% tree canopy cover requirements would compromise development feasibility and drive perverse outcomes.
- 3.4. Kāinga Ora is a key developer within Christchurch, having undertaken developments that range from small scale residential infill to larger comprehensive developments of 20+ units across multiple sites. The evidence of Ms Strachan includes a review of a sample of five Kāinga Ora developments, concluding that all resulted in good quality urban design and landscape outcomes.
- 3.5. Kāinga Ora believe the outcome being achieved on its development sites is broadly in line with the intent of the tree canopy cover rules, and imposing additional controls is unnecessary.

² <https://kaingaora.govt.nz/assets/Publications/Design-Guidelines/Landscape-Design-Guidelines-for-Public-Housing.pdf>. This guide replaces an earlier version from 2020.

- 3.6. Ms Strachan used these case studies to examine the application and functionality of the tree canopy coverage requirements and found that the methodology and calculations for determining whether a proposal achieves a 20% canopy cover are flawed and would not result in the canopy cover expected.
- 3.7. Ms Strachan's evidence also highlights how sites may need to forego areas of open lawn and/or built form in order to meet the requisite canopy cover, with implications for designing compliant areas of outdoor living space and the useability of these areas in a medium density context. Further, in order to meet the 20% canopy cover, landscaping would necessarily comprise of broadleaf exotics rather than natives, which is a perverse outcome.
- 3.8. Mr Clease³ described in detail why the Tree CC rules are flawed from a planning perspective and could result in a reduction in yield of one unit on a typical 800m² site, representing an overall 20-25% reduction in yield. Such a reduction would significantly compromise the feasibility of these developments and in turn reduce the ability for Kāinga Ora to deliver public housing in the city.

Tree Financial Contributions

- 3.9. PC14 proposes Financial Contributions for tree canopy cover where this cannot be provided onsite. Kāinga Ora opposes the Tree Canopy Financial Contribution (the Tree FC) package in its entirety and has sought for the Tree FC provisions to be deleted.
- 3.10. Financial contributions are only required where potential or actual adverse effects of a development cannot be avoided, remedied or mitigated through on-site measures. The introduction of the Tree FC suggests that there is a specific adverse environmental effect resulting from residential intensification that requires mitigation. However, the legislation includes a density standard that already deals explicitly with landscape outcomes in medium density environments.

³ Evidence of Mr Jonathan Clease on behalf of Kāinga Ora – Homes and Communities, dated 20 September 2023

- 3.11. Kāinga Ora also questions whether a financial contribution of this scale reflects the fair and reasonable costs of undertaking the necessary mitigation. Mr Clease analysed the proposed cost of the Tree FC as being \$50,000.00 per tree. The cost of being one tree short in a development (within certain areas), is approximately five times the Development Contributions (DC's) payable per residential unit, noting that DC's cover three waters reticulation, roading upgrades, public transport, cycleways, community facilities, regional parks, and local parks.
- 3.12. In June 2023, Kāinga Ora provided feedback on the Ōtautahi Christchurch Urban Forest Plan (UFP), attached as **Appendix A**. This feedback identified a number of concerns with the UFP including concern that the 20% threshold is unrealistic and not aligned with national direction; that the conclusions on canopy loss are inaccurate; that the methods would not achieve desired biodiversity outcomes; and that the plan had not considered all the effects of a 20% canopy cover.
- 3.13. These matters were not addressed or responded to in the UFP process, and Kāinga Ora continues to hold the same concerns.

4. CITY SPINE TRANSPORT CORRIDOR

- 4.1. The Kāinga Ora submission opposed the 'City Spine' being a qualifying matter and considers this to be inconsistent with the requirements of Section 77L. Kainga Ora remain of the view that the City Spine QM should be deleted in its entirety.
- 4.2. While described in Council evidence as being for "targeted infrastructure provision", Kainga Ora understand that the QM has been included within PC14 mostly for 'landscape amenity' reasons. This rationale is not considered justified, as effects on residential amenity generated by intensification are addressed explicitly in the NPS-UD, and furthermore Objective 4 of the NPS-UD is clear that amenity values will change over time.
- 4.3. If targeted infrastructure such as road widening is the driver for this QM, Council has land acquisition powers available to it through the Public

Works Act and associated designating powers as a Requiring Authority under the RMA.

- 4.4. Mr Joll⁴ has reviewed Council's expert evidence and found that there is no justifiable need to impose the City Spine Transport Corridor from an infrastructure or amenity perspective, and furthermore found that there are likely to be direct costs to landowners and the wider community through the reduction in design flexibility and potential yields.
- 4.5. Kāinga Ora supports this review and raises concern that imposing this unnecessary QM is likely to materially affect the feasibility of developing and therefore the ability for Kāinga Ora to deliver public housing within the City Spine Transport Corridor.

5. CONCLUSION

- 5.1. Through submissions on the various IPI processes across the country, one of the Kāinga Ora strategic goals is to ensure the implementation of the NPS-UD and the requirements of the Amendment Act achieve their stated outcomes.
- 5.2. The submissions by Kāinga Ora sought amendments to PC14 to ensure that development opportunities are maximised in locations which are close to public transport and/or employment opportunities and public amenities such as schools, retail and community services. In this way, well-functioning environments are formed to provide for the whole community's social, economic and cultural well-being, that meet the needs of both current and future generations.
- 5.3. If the requested relief is adopted, this will not only allow Kāinga Ora to adequately increase and improve its public housing provision, but it will also provide for significant development capacity and aid in the consenting and delivery of housing, being affordable housing, homes for first-home buyers, and significant market capacity across the city, and a choice of housing typology and size for all New Zealanders.

Dated 16 April 2024

⁴ Evidence of Mr Tim Joll on behalf of Kāinga Ora – Homes and Communities, dated 20 September 2023

APPENDIX A – Kāinga Ora Submission on UFP

6 March 2022

Ann Tomlinson

Ōtautahi Christchurch Urban Forest Plan

Christchurch City Council

Feedback provided via email: ann.tomlinson@ccc.govt.nz

FEEDBACK ON THE ŌTAUTAHI CHRISTCHURCH URBAN FOREST PLAN

Kāinga Ora – Homes and Communities (“**Kāinga Ora**”), at the address for service set out below, thanks Christchurch City Council for the opportunity to submit on the Ōtautahi Christchurch Urban Forest Plan “**Urban Forest Plan**”). This letter provides the substantive detail of Kāinga Ora’s submission on the Urban Forest Plan.

Background

1. Kāinga Ora was established in 2019 as a statutory entity under the Kāinga Ora-Homes and Communities Act 2019 and is required to give effect to Government policies. Kāinga Ora has two core roles:
 - a) Being a world class public housing landlord; and
 - b) Leading and co-ordinating urban development projects
2. 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; and
 - 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. Kāinga Ora is focused on delivering quality urban developments by accelerating the availability of build-ready land, and building a mix of housing including public housing, affordable housing, homes for first home buyers, and market housing of different types, sizes and tenures.
4. Kāinga Ora owns or manages approximately 63,800 properties throughout New Zealand comprising of rental properties, community group and transitional housing.
5. Despite consenting several hundred new dwellings in the past three years in Christchurch City, the current wait list in Christchurch continues to grow and there are now approximately 1,734 applicants¹. Christchurch City is identified as an area to reconfigure and grow Kāinga Ora’s housing stock to provide efficient and effective public and affordable housing that is aligned with current and future residential demand in the area, and the country as a whole.

¹ As at December 2022 ([housing-register-december-2022.xlsx \(live.com\)](#))

6. In terms of its role as a public landlord, there has been a marked change in the type of housing that is required by Kāinga Ora's tenant base:
 - a) Demand in particular for the Christchurch City area has increased for apartments, terraced housing and for single and 2 bedroom housing required for single persons/couples. Currently the demand for a 1 bedroom typology sits at 60% of the waiting list total. The demand for a 2 bedroom typology sits at 26% of the waiting list total². This means that some 86% of wait list demand is for 1-2 bedroom units.
 - b) As a result, the size of many public houses does not match the changing demand for public housing, with a large proportion of the Kāinga Ora's current housing typologies comprising of 3-4 bedroom homes on large lots; this can be too large for smaller households and potentially considered not fit for purpose for some tenants.
7. As such, in addition to its role as a public housing provider, landowner, landlord, rate payer and developer of residential housing, Kāinga Ora will play a greater role in urban development more generally. The legislative functions of Kāinga Ora 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.
8. 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.
9. 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's existing housing, planned residential and community development and Community Group Housing ("CGH") providers; and
 - e) Working with local authorities to ensure that appropriate services and infrastructure are delivered for its developments.

Outline of Submission on the Urban Forest Plan

10. Kāinga Ora thanks the Council for the opportunity to provide submission on the Urban Forest Plan.

² As at December 2022 ([housing-register-december-2022.xlsx \(live.com\)](#))

11. In particular, Kāinga Ora supports:
- a) The Council's recognition of trees as a key element in successful urban environments. This aligns with Kāinga Ora's in-house landscape design guides which inform all Kāinga Ora's projects and the need to integrate landscaping with housing.
 - b) The recognition of the need for well-functioning urban environments (consistent with the direction set out in the National Policy Statement on Urban Development 2020 ("NPS-UD"))
 - c) Strongly support CCC increasing its prioritisation of the need to renew streetscapes, especially in areas where intensification has and will continue to occur. In the 1990-early 2000s CCC ran a very successful 'Neighbourhood Improvement Programme' that focussed on streetscape renewal in medium density zones. These included the replacement of deep-dish kerb and channel, undergrounding wires, and the introduction of street trees and street calming initiatives.
12. However, analysis of the Urban Forest Plan has highlighted several matters that Kāinga Ora considers could compromise the intensification of housing and the planned urban built form that is envisioned by the NPS-UD and the associated Housing Supply Act.
- a) Kāinga Ora is an advocate for the implementation of the intensification provisions of the NPS-UD and the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act (the Housing Supply Act) and ensuring planning decisions contribute to achieving well-functioning urban environments. Kāinga Ora consider the requirements to achieve 20% tree canopy cover is inconsistent with the spatial outcome requirements set out in the NPS-UD, and the Medium Density Residential Standard (MORS) provisions of the Housing Supply Act. The tree canopy requirements in the Urban Forest Plan present an unrealistic application to more intensive housing forms/ areas – in short, you cannot deliver both medium density housing and have 20% tree cover on private land.
 - b) It is considered that the starting base position of 20% canopy cover in the Urban Forest Plan is an unrealistic target and unrealistic comparisons have been made to Auckland and Wellington given the topography, climate variances, and pre-European dominant vegetation type between these cities and Christchurch. The UFP notes that current tree cover is only 15%, however this includes the extensive plantation forests at Bottle Lake, Mcleans Island, and Cashmere i.e. it is not urban forest cover. The report underlying the measurement of canopy cover notes that 65% of tree cover is located in rural and open space zones i.e. of the 15% total canopy cover, only a third is located across the urban areas of the City¹.
 - c) The unrealistic comparison is self-evident in the Urban Forest Plan which identifies that the only suburbs that are currently achieving 20% cover are Cashmere and Fendalton – both suburbs with larger than normal sites and geographic features (Bike Park forest and Riccarton Bush and waterways respectively) that provide space for additional planting. It is wholly unrealistic to expect a medium density suburbs such as St Albans

¹ <https://ccc.govt.nz/assets/Documents/Environment/Trees/Urban-Forests/Christchurch-City-Canopy-Cover-report-2018-2019.pdf>, para.4.2.2, page 7

or Linwood to deliver canopy cover equivalent to Cashmere or Fendalton as the built forms and underlying topography are fundamentally different.

- d) The Urban Forest Plan should genuinely be a plan for the urban parts of the City i.e. the starting point should be an accurate estimate of the canopy cover of urban areas, with a target for future years set at an appropriate level for urban areas that is consistent with a growth management strategy of accommodating growth through intensification.
- e) The Urban Forest Plan defines tree canopy cover to be trees which are 3.5m and over, and notes that it excludes many of the tree planting projects that have been undertaken in the five years prior. Much is made in the Urban Forest Plan of how measuring canopy cover helps us to understand our urban forest. By excluding planting that has occurred in the past 5 years, the data that has been used to inform the canopy cover targets is misleading. For example, the figures provided on the decrease of tree canopy cover between 2015/16 and 2018/19 are used to highlight "a trend of declining canopy cover", but do not provide any consideration in the increase in regeneration planting that has occurred in the past 5 years, particularly associated with multi-unit residential developments. The 2018-19 report likewise notes that the decline identified between the two periods should be treated with caution, and is largely caused by harvesting of plantation forest in Bottle Lake and following the Port Hills fires i.e. the provision of more housing is not the leading cause of canopy reduction.
- f) There is minimal acknowledgement of the potential negative effects of large trees (leaf drop, root systems, building safety, unusable land (which still gets rated), loss of access to sunlight, maintenance costs.
- g) The Urban Forest Plan provides no incentives for property owners to retain trees, but rather seeks to penalise people if they don't plant more.
- h) In terms of loss of access to sunlight, it is noted that the Council proposes to introduce Sunlight Access as a qualifying matter in Plan Change 14 to the Operative District Plan, thereby modifying density standards in a manner that it considered "best achieves an equitable outcome to sunlight access when compared to an Auckland context – the MDRS baseline". The requirement to include 20% tree canopy cover would in reality reduce access to sunlight for future residents and is therefore inconsistent with the main intent of the proposed qualifying matter.
- i) A key principle of the Urban Forest Plan is that trees are grown in locations that allow them to reach maturity and benefit the local environment, and appears to heavily rely on IMPs which reference Mahinga Kai and indigenous biodiversity, however the planning provisions proposed in the draft Christchurch Plan do not encourage the planting of indigenous trees, but rather fast-growing exotic species.
- j) The Urban Forest Plan fails to acknowledge the high biodiversity and ecosystem services values of smaller shrubs and plants – but focuses on a tree canopy. For example, it seeks a 75% tree canopy cover for waterway areas, when it would probably be more practical to promote smaller shrubs and plants that better restore waterway health.

Draft Financial Contributions Rule – Tree Canopy Cover

13. Kāinga Ora is opposed to requiring Financial Contributions ('FC') for 'developments that do not achieve the proposed 20% tree canopy on development sites'.
14. In principle, FCs are a tool or mechanism to enable Council to take money at the time of development to pay for (or mitigate) the effects of that development. FCs in the past have typically been used to facilitate localised infrastructure upgrades such as intersection signalisation or sewage pump station upgrades, where such are both necessary to mitigate the additional effects/ demand of a development and are not already programmed to be undertaken through Council's Long Term Plan (and are therefore already funded through Development Contributions ('DCs') and/or rates).
15. In this instance there appears to be no nexus between the FC and the environmental effect it is to mitigate. Landscaping provisions under the Operative District Plan and the draft provisions of Plan Change 14 are required for at least 20% of sites under the MDRS. A separate rule on tree planting was not considered by Parliament to be necessary to provide an acceptable urban environment. Development of these zones in accordance with the zone rules cannot therefore generate an environmental effect that warrants mitigation. The proposed FC does not therefore appear to have any nexus between the environmental outcomes anticipated in the MDRS and the need for mitigation.
16. In a strategic sense, Council is pursuing an approach to urban growth management primarily through intensification (as opposed to greenfield expansion). No new greenfield areas have been rezoned since the Land Use Recovery Plan in 2012 a decade or so ago. No plan changes to rezone additional land are currently being progressed by Council. Whilst the Amendment Act has further enabled intensification, this does not constitute a change in strategic direction for the Council – growth through intensification has and continues to be the preferred growth management approach.
17. The effects of intensification on amenity and tree cover have therefore been anticipated for a decade or more. Council has been taking DCs (and before them reserve contributions) from infill development for at least the past 30 years to fund the acquisition of new open space to meet the additional demands generated by new growth. The effect of pursuing a growth management approach of intensification carries with it an obligation to appropriately anticipate and fund the infrastructure necessary to support that growth. This includes both network infrastructure such as roading and three waters, and also 'soft' infrastructure such as community facilities, and arguably trees in streets and parks. This is a business-as-usual expense whereby land for such planting already exists in the form of road reserves and existing open spaces, or is provided through DCs to fund new open space acquisitions. If the Council's preferred strategy for managing urban growth requires additional tree planting in public spaces, then this should (and to a certain extent already does) form part of the LTP process.
18. The Forest Plan is silent on the financial contribution calculations, however the proposed formula for calculating the FC contained in the technical information supporting Plan Change 14 to the District Plan, is based on one tree resulting in a future canopy of 113m². Whilst not explicit, it is assumed that this figure is based on a tree with a canopy radius of 6m, resulting in approximately 113m² of total canopy area ($A = \pi r^2$). If this is the case, then a simpler formula would be to require 1 tree to be planted per 100m² of site area, as an easier compliance threshold than a trigger of 10% of future canopy cover.

19. The FC formula provided for the draft Plan Change is proposed to be made up of two separate elements. The first element is \$2,037+gst to cover tree planting and maintenance. The second element is to cover the land purchase cost to enable Council to acquire land for tree planting. The cost of the land acquisition element is land value x 50m² per tree. On the basis that land value in residential areas in Christchurch averages around \$800/m² (\$400k for a 500m² section) the FC per tree will run to over \$40,000. To put that into context, the cost of being 1 tree short in a development is more than four times the Development Contributions payable per residential unit and that covers the costs of all of the following matters: 3-waters reticulation, roading upgrades, public transport, cycleways, community facilities, and regional parks, and local parks.
20. Kāinga Ora has significant concerns regarding the use of FC as outlined in the draft provisions for PC14 as a tool – once notified, the proposed Plan Change has still to go through its own process and feedback and subsequent submission have and will raise real concern with this aspect of PC14. This aspect should be removed from the Urban Forest Plan as an implementation tool until such time as the PC14 process has concluded. The Urban Forest Plan should instead focus primarily on CCC moves that can be made on CCC land – streets, parks, wetland/ natural areas.
21. Given that Council already own extensive areas of park and open space land (including several thousand hectares of land on the Port Hills and Red Zone), in addition to extensive road reserve and local park areas, and given that Council takes Development Contributions for new parkland as part of any new development, the need for the land component to form part of the FC appears to be particularly hard to justify. Where DCs are taken for local parks, such parks invariably contain extensive tree cover, as amenity tree planting is readily compatible with passive recreation activities.
22. The need to provide rapid canopy cover potentially creates a perverse incentive to plant faster growing exotic species rather than natives. The proposed FC could therefore result in a decline in biodiversity by driving developers to plant exotics over natives, with attendant adverse biodiversity outcomes, which is contrary of the desire in the Urban Forest Plan to seek diversity in tree species.
23. Whilst supporting the general outcome of tree planting across the City, the current methods of DCs paid for at time of development and used for open space acquisition, in combination with business as usual rates to support Council's preferred growth management approach and District Plan zone-based policy and rule frameworks that guide anticipated built outcomes, are considered to be more efficient and effective than the proposed FC framework.

Key Summary of Submission

24. Kāinga Ora welcomes the Council's recognition of trees as a key element in successful urban environments. This aligns with our internal landscape design guides which inform all our projects and the need to integrate landscaping with housing.
25. Kāinga Ora strongly support the Council increasing its prioritisation of the need to renew streetscapes, especially in areas where intensification has and will continue to occur. Such renewals should include kerb and channel replacement, undergrounding of overhead wires, and street tree planting.
26. Kāinga Ora does however have concerns with aspects of the plan regarding having a 20% target that is fundamentally unachievable in medium density environments on private land, and with

the reliance on Financial Contributions in PC14 as an implementation method when this FC has yet to be tested through submissions and hearing processes.

27. Should you have any questions in relation to the matters outlined above, please do not hesitate to contact me.

Dated 6/08/2023

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Brandon Liggett

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National Planning, Urban Design and Planning Group

Kāinga Ora – Homes and Communities

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