

**BEFORE INDEPENDENT HEARING COMMISSIONERS
AT RANGIORA / WAIMAKARIRI**

**I MUA NGĀ KAIKŌMIHANA WHAKAWĀ MOTUHAKE
WAIMAKARIRI**

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of the hearing of submissions and further
submissions in **Variation 1 to the Proposed
Waimakariri District Plan**

HEARING TOPIC: Stream 7B Variation 1

**SUMMARY STATEMENT OF TIMOTHY JAMES HEATH
ON BEHALF OF KĀINGA ORA – HOMES AND COMMUNITIES**

(ECONOMICS)

13 SEPTEMBER 2024

Instructing solicitor:
C E Kirman
Special Counsel
Kāinga Ora - Homes and Communities
PO Box 14594
Central Auckland 1051
E: claire.kirman@kaingaora.govt.nz

1. INTRODUCTION

- 1.1 My name is Timothy James Heath.
- 1.2 This summary outlines the key points relevant to my economic position on the appropriateness and economic efficiency of Kāinga Ora's proposal to establish a Height Variation Control Area ("HVCA") around the Rangiora Town Centre and outline my concerns with reliability of the basis for the proposed Sunlight and Shading Qualifying Matter.
- 1.3 I confirm I have complied with the Code of Conduct for Expert Witnesses (Environment Court Practice Note 2023) in producing this statement.

2. EXECUTIVE SUMMARY

- 2.1 In my view, the development of compact residential form is not only directed by the NPS-UD¹ but is a fundamental aspect of urban form relating to economic efficiency, affordability, choice, improved amenity, and affordable infrastructure provision.
- 2.2 The HVCA sought by Kāinga Ora would enable up to five storey development within a walkable distance around the Rangiora Town Centre. This represents a significant increase in the capacity potential, centred around the primary commercial centre for the district. It also safeguards the potential for intensification to occur over the longer term by providing clarity to the market as to the council's preferred location for intensification.
- 2.3 Housing Affordability is a significant issue in Waimakariri as it is across the country. There is a need for a range of typologies to be provided to the market in order to give the market choice and improve housing affordability.
- 2.4 While the Waimakariri Proposed District Plan represents a step in the right direction for Waimakariri, I consider the current level of enablement for residential densification in efficient locations does not go far enough. In order to encourage urban intensification to occur, there needs to be

¹ National Policy Statement on Urban Development 2020

both a competitive edge, sufficient opportunity and a level of enablement that makes such development profitable and attractive to developers.

- 2.5 If there is demand for these activities in the market and five-storey apartment blocks are built, then allowing for the activity would have satisfied a market demand that otherwise would have gone unmet. Given the economic benefits of this activity occurring within the identified overlay, I consider this to be of significant economic benefit.
- 2.6 I hold the view there are some fundamental flaws in the assessment of the effects of the Sunlight and Shading Qualifying Matter. Contrary to the analysis by Council, I believe an 8m height limit as opposed to 11m will have a significant effect on development capacity and result in a less efficient outcome in the affordability, choice and location of which housing is delivered to the market. I also consider the geospatial modelling which attempts to quantify the effect of shading is flawed and the effect of an 11m height limit relative to an 8m height limit has been greatly overstated.
- 2.7 In reality, the supposed 70% increase in shading is the combined effect of both an increase in height and MDRS intensification across the entire residential area. In order for any conclusions to be made regarding the effect of the height limit, all other variables should have been held constant. This does not appear to be the case.
- 2.8 From an economic perspective, I consider that the actual effect of this proposed qualifying matter is a net economic loss. My concern is that the proposed 8m height limit may have wider-reaching impacts on the enablement of appropriate densities and, particularly, for Kāinga Ora to achieve efficient development options, including appropriate typologies, for social housing.

Timothy Heath

13 September 2024