

Further Submission on Invercargill Plan Change 2: Housing and Code of Practice by Kāinga Ora – Homes and Communities

Clause 8 of Schedule 1 to the Resource Management Act 1991

To: Invercargill City Council
planning@icc.govt.nz

Name of Further Submitter: Kāinga Ora – Homes and Communities

1. **Kāinga Ora – Homes and Communities (“Kāinga Ora”)** makes this further submission on **Plan Change 2: Housing and Code of Practice (“PC2”)** in support of / in opposition to original submissions on **PC2**.
2. Kāinga Ora has an interest in PC2 that is greater than the interest the general public has, being an original submitter on PC2, with respect to its interests as the Crown entity responsible for the provision of public housing, and its housing portfolio in Invercargill.
3. Kāinga Ora makes this further submission in respect of submissions by third parties on PC2.

Reasons for further submission

4. The submissions that Kāinga Ora supports or opposes are set out in the table attached as **Appendix A** to this further submission.
5. The reasons for this further submission are:
 - (a) The reasons set out in the Kāinga Ora primary submission on PC2.
 - (b) In the case of the Primary Submissions that are opposed:
 - (i) The Primary Submissions do not promote the sustainable management of natural and physical resources and are otherwise inconsistent with the purpose and principles of the Resource Management Act 1991 (“**RMA**”);

- (ii) The relief sought in the Primary Submissions is not the most appropriate in terms of section 32 of the RMA;
 - (iii) Rejecting the relief sought in the Primary Submissions opposed would more fully serve the statutory purpose than would implementing that relief; and
 - (iv) The Primary Submissions are inconsistent with the policy intent of the Kāinga Ora Primary Submission.
- (c) In the case of Primary Submissions that are supported:
- (i) The Primary Submissions promote the sustainable management of natural and physical resources and are consistent with the purpose and principles of the RMA and with section 32 of the RMA;
 - (ii) The reasons set out in the Primary Submissions; and
 - (iii) Allowing the relief sought in the Primary Submissions supported would more fully serve the statutory purpose than would disallowing that relief.
6. Without limiting the generality of the above, the specific relief in respect of each Primary Submission that is supported or opposed is set out in **Appendix A**.
7. Kāinga Ora wishes to be heard in support of its further submission.
8. If others make a similar submission, Kāinga Ora will consider presenting a joint case with them at a hearing.

DATED 13 March 2026

Kāinga Ora – Homes and Communities



Brendon Liggett

Manager – Development Planning

ADDRESS FOR SERVICE:

Kāinga Ora – Homes and Communities

PO Box 74598

Greenlane, Auckland

Attention: Development Planning Team

Email: developmentplanning@kaingaora.govt.nz

Appendix A – Further Submission Table

Submitter	Number	Topic	Sub-Section	Provision	Position	Submission Point Summary	Relief/ Decision Sought	Kāinga Ora response (support or oppose)	Kāinga Ora reasons	Decision(s) sought (allow or disallow)
Mike O'Regan	13.01	Whole plan change			Support in part	Property owner who generally supports the intent of the plan change, conditional on the introduction of stronger and more enforceable design standards that prioritise quality, longevity, and good urban form. Higher density housing will have long-term impacts on neighbourhoods. Buildings constructed today are likely to remain for many decades, and it is important that they are designed to age well and contribute positively to the streetscape over time. Without clear and robust design requirements, there is a risk that development will default to minimum standards, resulting in box-like, visually poor buildings that may meet technical rules but do not provide lasting quality. The submitter is concerned that relying on non-statutory design guidance alone may not be sufficient to achieve consistently good outcomes. Strong design standards will help future-proof housing stock, protect existing property owners, and ensure that increased density enhances rather than degrades residential areas.	Ensure that key design principles are embedded into enforceable standards, including but not limited to: • Building articulation and variation to avoid flat, boxy façades • Reasonable setbacks, site coverage limits, and building height transitions to protect neighbourhood character • Durable, high-quality exterior materials suitable for Invercargill's climate • Design that considers streetscape appearance, not just internal layout • Adequate outdoor space and practical parking solutions	Oppose	Kāinga Ora considers that the notified provisions (subject to the amendments sought in its submission) are adequate in ensuring quality built outcomes. It also notes that many of the suggestions made by the submitter have already been addressed in the existing and notified provisions of the district plan i.e. setback, site coverage, building height, outdoor space and car parking standards. Streetscape appearance is controlled through the notified standards. i.e. Building height, yards, and fencing. It is also adequately considered within the notified assessment criteria. Kāinga Ora notes that suitable building materials are managed through the Building Act.	Disallow

Appendix A – Further Submission Table

Fire and Emergency New Zealand	15.01	General			Not specified	The risk of fire represents a potential adverse effect of low probability but high potential impact. Fire and Emergency has a responsibility under the Fire and Emergency New Zealand Act 2017 to provide for firefighting activities to prevent or limit damage to people, property and the environment. As such, Fire and Emergency has an interest in the land use provisions of the IDP to ensure that, where necessary, appropriate consideration is given to fire safety and operational firefighting requirements. The provision for adequate water supply for firefighting activities is critical for the reasons set out in the submission. It is important that any new subdivision or land use has access to adequate water supply (whether reticulated or non-reticulated). This firefighting water supply will provide for the health, safety and wellbeing of people and the wider community, and therefore contributes to achieving the purpose of the RMA. PC2 enables more intensive development, including up to three-storey buildings and smaller lot sizes, which may increase demand on water supply infrastructure and create challenges for emergency services access. While the COP provides for firefighting water supply to be designed in accordance with SNZ PAS 4509:2008, PC2 does not clearly require compliance with the COP for all new land use developments in the Residential 1 and Residential 1A zones, particularly where development does not involve subdivision. The submitter also notes that water supply modelling to confirm network capacity is not yet complete, and that intensification may occur in advance of necessary infrastructure upgrades. The submitter also requires adequate access for new developments and subdivisions to ensure that Fire and Emergency can respond to emergencies. Existing access and transport standards may not adequately provide for emergency services access to medium-density developments, particularly where pedestrian-only access or limited right-of-way access is proposed.	- Amend the Residential 1 and Residential 1A Zone objectives, policies, and rules to require that all new land use developments and subdivisions connecting to the reticulated network comply with the COP, including firefighting water supply standards in accordance with SNZ PAS 4509:2008. - Add provisions to ensure that residential intensification does not occur where water supply infrastructure capacity and pressure is insufficient, and to require necessary upgrades to be completed prior to development where required, having regard to water supply modelling outcomes. - Amend access and transport standards (including rights-of-way width, length, gradient and turning requirements) to ensure all permitted residential development is accessible for emergency services. - Introduce matters of discretion requiring consideration of emergency services access for developments with both vehicle and pedestrian-only access. - Clarify the application of access standards to land use developments that do not involve subdivision, including rights-of-way serving newly created lots. - Any other consequential amendments necessary to give effect to the above changes.	Oppose	Whist Kāinga Ora acknowledges that emergency services are a core component of a well-functioning environment, Kāinga Ora notes that wider vehicle crossings and right-of-ways etc. may have a cumulative effect on the streetscape and reduce area available for housing which needs to be fully assessed and justified by the submitter.	Disallow
--------------------------------	-------	---------	--	--	---------------	---	---	--------	---	----------

Appendix A – Further Submission Table

National Public Health Service Te Waipounamu	14.04	Residential Zones	Objectives	RES-O2	Support in part	While the submitter supports the text that notes the population is slowly growing and ageing, this statement needs to reflect reference to Universal Design for the same reasons as the submitters previous submission point.	Amend as follows: A range of housing types <u>and accessible built forms that include Universal Design principles.</u>	Oppose	Whilst Kāinga Ora supports a range of housing types for the community, it opposes universal design requirements within the District Plan. Universal design requirements are already managed through the Building Act.	Disallow
Environment Southland	11.02	Residential 1 and 1A Zones - General			Support in part	Supports the intent to provide for addition urban development and high-quality urban design through PC2. Supports enabling greater density and diversity of housing; and good quality urban design outcomes as it aligns with the objectives, policies and Invercargill City Council's responsibilities in the Urban Chapter of the SRPS. Specifically, Objectives URB.1, along with Policies URB.2, 3, 4, and 6. Refer to submission in full. Issue URB.3 of the SRPS states that "Urban areas in Southland which develop in ways that do not recognise the principles of high-quality urban design are likely to be less cohesive, can experience reduced amenity and cultural values and can fail to provide for a range of transportation modes." Terminology used in the PC2 replaces "high-quality" with "good" urban design for RES 1 and 1A Zones. Furthermore, Policy URB.4 of the SRPS encourages "high quality design".	Promote high quality urban design. Remove inconsistencies in the wording of "good" urban design applying to RES 1 and 1A zones.	Oppose	Kāinga Ora considers that the requirement to achieve "high quality urban design" is not an effective outcome and is open to interpretation and subjective assessment which may lead to ineffective and inefficient administration or impose unnecessary costs on landowners and developers and thereby reducing housing affordability. Kāinga Ora notes that the RPS encourages rather than requires high quality urban design.	Disallow
National Public Health Service Te Waipounamu	14.03	Residential 1 Zone	Policies	RES1Z-P5	Support in part	Support the explanation that notes a need to meet the needs of an ageing population. Given that as people age, they are more likely to become disabled, the submitter recommends this clause incorporates reference to Universal Design as an Internationally Recognised solution that makes buildings accessible to all people of all abilities at any stage of life. It includes people who use wheelchairs or other mobility aids, people with impaired vision and people who are elderly or very young. Disabled people experience poorer health outcomes than non-disabled people, and they acutely feel these inequities.	After well-designed detached, semi-detached, terraced housing and low-rise apartments are encouraged where they provide a high-quality living environment for residents. Add Given Invercargill's ageing population, the concept of Universal Design needs to be actively promoted.	Oppose	Whilst Kāinga Ora supports a range of housing types for the community, it opposes universal design requirements within the District Plan. Universal design requirements are already managed through the Building Act.	Disallow

Appendix A – Further Submission Table

						These outcomes are influenced by unfair barriers to full participation in society. While the detail in Section 3.5 of the Design Guide is supported, the submitter believes the issue to be of sufficient importance to be included in the text of the Plan itself, especially considering Invercargill's ageing population.				
Sharon R. Anaru Hill	08.01	Zones	Residential 1A Zone		Oppose	Oppose Zone 1A being part of the changes proposed. The re-zoning for higher density in this zone will take away the sense of community and put extra pressure on resources and safety long term.	Remove area 1A from the change to higher density or at the very least do a finer catchment of it.	Oppose	Kāinga Ora supports the RES1A boundaries as notified and notes that any redevelopments would be subject to provisions which seek to address the concerns outlined by the submitter. Any changes to the zoning would require further assessment and justification.	Disallow
Environment Southland	11.06	Zones			Oppose	Conscious that there are areas proposed for housing intensification within PC2 (particularly between Tay and Tweed Streets) that are within the potentially floodable area of the Otepunī Creek. Environment Southland opposes any intensification in potentially floodable areas as it is contrary to Policies NH.3, NH.4, NH.5 and NH.6 of the SRPS which requires a precautionary approach, avoiding significant risk and mitigating natural hazard effects. Intensification of residential dwellings should not occur within an identified natural hazard location as it is contrary to the SRPS.	Oppose the proposed changes to properties between Tay and Tweed Streets from PC2 due to these properties being within a potentially floodable area from the Otepunī Creek. Changes are requested to remove areas between Tay and Tweed Street from PC2 as they are identified as potentially floodable by the Otepunī Creek.	Oppose	Kāinga Ora notes that the Natural Hazard chapter of the district plan manages risk from flooding. The properties in Residential 1 and 1A between Tay St and Tweed St are not exposed to significant natural hazard risk, and therefore an avoid approach to development is not required. Exclusion of certain properties from the plan change would need to be further assessed and justified.	Disallow