

## Lezel Beneke Summary Statement – Plan Change I PNCC

2 September 2025

1. My name is Lezel Beneke, I am a Principal Development Planner, I oversee the plan making program for Kāinga Ora. I have 18 years' experience as a planner, but I am here in a corporate capacity and not as a planning expert.
2. I will discuss the Kāinga Ora stock within Palmerston North and the barriers we face under the Operative District Plan and why extending the Medium Density Residential Zone and being able to utilise the PCI provisions is important.
3. Kāinga Ora is the largest landlord in New Zealand. Within Palmerston North, Kāinga Ora manages a public housing portfolio of 1,603 homes.
4. The Ministry of Social Development waitlist for Palmerston North is 402 households.
5. The Palmerston North Kāinga Ora stock is aged and the average age is 51 years and in need of renewal. Ideally, the lifespan of our home is 50 years. After that maintenance costs creep up significantly through to about 70 years, whole of life costings are measured over 60 years.
6. Further – the need for homes is significantly swayed to one- and two-bedroom homes in Palmerston North. Externally, this is 339 homes and internally, with existing customers, is at 449 one- and two-bedroom homes. The majority of Palmerston North stock are larger three-bedroom homes. We currently only have 8 one-bedroom homes in the city and 245 two-bedroom homes.
7. Because of age and that our current portfolio doesn't match the demand – i.e. smaller families being in larger homes – we are focused on reconfiguring and redeveloping our stock.
8. The redevelopment and reconfiguration of the Kāinga Ora portfolio will benefit significantly through the ability to be developed through the new Medium Residential Zone provisions.
9. This provides the opportunity to increase the housing stock to meet demand and develop Kāinga Ora land more efficiently by providing smaller housing typologies.
10. Kāinga Ora have faced significant barriers trying to redevelop within Palmerston North under the ODP and the General Residential Zone rules.
11. The average time to process a Kāinga Ora resource consent has been 9 months, with the shortest consenting time being 4 months (6 unit project), and the longest time period being 17 months (65 unit project).
12. Complications in the consenting process are resulting in significant financial implications for Kāinga Ora. This includes costs associated with consultants and rework in design. Often the issues we face in s92 requests are urban design focussed.

13. This also includes a loss of approximately **\$94k per week in prospective rental income** (based on forecast rental income from projects that were in consenting phase in the previous financial year). Further carrying costs of vacant/void properties awaiting redevelopment.
14. A delay or loss of Kāinga Ora projects will also have significant financial implications for Council and the construction industry. i.e. rates, capital investment and financial contributions.
15. Our experience in Palmerston North is that development has become expensive and we are moving to other areas within the region, where the process is more enabling.
16. In the past 2 years, Kāinga Ora is focused on delivering homes at scale and pace and we have focussed on areas where homes can be delivered without barriers.
17. This method includes a set range of typologies that are delivered across the country. As mentioned within my statement, delivering these typologies within regions where there are bespoke rules, such as the HIRB, front door and outlook rules can be cumbersome, especially within Palmerston North where the council are so focused on urban design outcomes.
18. In regard to the stormwater overlay, we agree that flood risk needs to be addressed and where needed, development should mitigate those effects. But this is more so where the effects are valid. Mr Jaggard will address this from a technical perspective.
19. What we see is a trend with councils and the direction of draft national policy, a risk hierarchy and then provisions to suit. i.e. Wellington Region and PC14 in Hamilton. A further example is Waimakariri PDP which includes the need to obtain a certificate from Council to address floor levels etc.

Lezel Beneke  
Kāinga Ora – Homes and Communities