

**BEFORE INDEPENDENT HEARING COMMISSIONERS
IN THE ROTORUA DISTRICT**

**I MUA NGĀ KAIKŌMIHANA WHAKAWĀ MOTUHAKE
ROTORUA**

**IN THE MATTER of the Resource Management Act 1991
AND**

**IN THE MATTER of the hearing of submissions on proposed Plan
Change 8 to the Operative Rotorua District Plan**

**STATEMENT OF PRIMARY EVIDENCE OF LEZEL BENEKE
ON BEHALF OF KĀINGA ORA – HOMES AND COMMUNITIES**

(CORPORATE)

2 APRIL 2026

1. EXECUTIVE SUMMARY

1.1 My name is Lezel Beneke. I hold the position of Principal Development Planner within the Housing Delivery Group at Kāinga Ora – Homes and Communities (“**Kāinga Ora**”) and am presenting this evidence on behalf of Kāinga Ora.

1.2 The key points addressed in my evidence are:

- (a) The removal of all hazards maps from the District Plan¹.

2. INTRODUCTION

2.1 My name is Lezel Beneke. I hold the position of Principal Development Planner within the Housing Delivery Group at Kāinga Ora.

2.2 I am a Full Member of the New Zealand Planning Institute. I hold a Bachelors Degree with honours in Planning from the University of Auckland. I have held roles in the planning profession for the past 18 years and have been involved in advising on issues regarding the Resource Management Act 1991 (“**RMA**”) and District Plans.

2.3 My experience includes working within local authorities, private consultancy and as a sole trader. For the past 4.5 years I have been employed by Kāinga Ora (formerly Housing New Zealand).

2.4 I have been providing development planning expertise within Kāinga Ora since 2021. In this role I have:

- (a) Undertaken assessment and identification of redevelopment land within the portfolio, including hazard assessments;
- (b) Provided input into strategic land planning, including the Asset Management Strategy, various investment and land use frameworks, and various structure plan processes of Kāinga Ora;
- (c) Provided advice on the regulatory planning processes associated with Kāinga Ora residential development projects;

¹ Except for the map of the Geothermal Systems Overlay and Lake Ōkāreka High Lake Level Resilience Area

- (d) Undertaken engagement with local authorities, local communities and other agencies on matters relating to regulatory policy frameworks associated with residential development;
- (e) Provided advice on, and management of, input into strategic planning activities including plan changes and plan review processes throughout the country, including more recently, technical lead and project management of Kāinga Ora submissions and corporate evidence relating to the National Policy Statement on Urban Development 2020 (“**NPS-UD**”), including input on plan changes addressing natural hazards across the country.

2.5 I am familiar with the Kāinga Ora corporate intent in respect of the provision of housing within the Rotorua District. I am also familiar with the national, regional and district planning documents relevant to the Rotorua District Plan (**ODP**).

2.6 I confirm that I am authorised to give evidence on behalf of Kāinga Ora in respect of hearings on Plan Change 8.

3. **BACKGROUND TO KĀINGA ORA AND RATIONALE FOR THE KĀINGA ORA SUBMISSIONS**

3.1 Kāinga Ora is the largest residential landlord in New Zealand, providing public housing to more than 200,000 people who face barriers (for a number of reasons) to housing in the wider rental and housing market. At the local level, Kāinga Ora manages a public housing portfolio of 1,086 homes in the Rotorua District², making it a significant landowner. At the time of writing, there are a further 642 households on the public housing waitlist in Rotorua who need a home, according to the Ministry for Social Development.³

3.2 As a result, Kāinga Ora maintains a significant interest in how the provisions of PC8 enable redevelopment and renewal activities across

² As at 30 September 2025 [Managed-Stock-TLA-September-2025.xlsx](#)

³ As at September 2025 [housing-register-september-2025.xlsx](#)

its portfolio, whilst managing levels of risk associated with hazards, so that Kāinga Ora is able to continue to provide its core public housing function of housing those in need.

4. THE USE OF NON-STATUTORY MAPS

- 4.1 Whilst not an outstanding matter, Kāinga Ora wish to emphasise support for using hazard mapping as a non-statutory information layer referenced within the District Plan where those hazards are provided with dynamic datasets and are changeable over time. This enables the non-statutory mapping layer to be regularly updated in relation to the location and level of risk of the hazard based on the most current best practise and scientific research. It provides greater certainty to all parties seeking to develop under the operative District Plan rules. It also avoids the need to go through repetitive, lengthy, and costly Plan Change processes under the RMA to update the planning maps within the District Plan, particularly as international and national scientific knowledge around climate change continues to evolve.
- 4.2 Additionally, non-statutory maps creates the opportunity for a process, detailed in the evidence of Paula Meredith⁴ and the s42A report⁵, to challenge the identification of a hazard using the most up to date data available. In doing so, the framework enables a more streamlined consenting pathway for developments, whilst ensuring hazard risks are appropriately managed. This is certainly pertinent for flood hazards.
- 4.3 Kāinga Ora have been involved in numerous plan changes and appeals in relation to the use of non-statutory hazard maps. Of relevance are the consent orders recently determined by the court for the Waikato Proposed District Plan and Plan Change 27 to the Tauranga City Plan. Both have determined that non statutory GIS hazard layers can be used for determining flood hazards. More recently too, Hamilton City Council's PC14 has decided to maintain flood hazard mapping outside of the Plan for the same reasons outlined by Rotorua Lakes Council.

⁴ Statement of Evidence of Paula Catherine Meredith on behalf of Rotorua Lakes Council (Flood Hazard Information for Rule Implementation), Dated 13 March 2026

⁵ Section 3.8.2(10)

Auckland Council's Plan Change 120 also continues to maintain hazard mapping outside of the Auckland Unitary Plan.

- 4.4 Kāinga Ora consider that the ability to update mapping to reflect changes within the catchment, climate change or mapping errors outweighs such a need to allow for a statutory process to challenge flood mapping. Correcting modelling errors in itself, would pose practical difficulties for both Council and individual landowners in terms of the Schedule 1 RMA statutory plan change process. It is further noted that the ability to challenge such maps by landowners is still an option if information is provided to council to rectify any anomalies.
- 4.5 Further, Kāinga Ora consider the policy and rule criteria within PC8 is sufficiently well-wrought and the review process sufficiently well-developed that the general public is better served by having the flood maps as non-statutory documents, amenable to review and individual expert challenge outside of any plan change process.
- 4.6 Kāinga Ora also notes that this methodology is in line with Policy 5 and Part 3.4 of the National Policy Statement for Natural Hazards 2025 (**NPS-NH**) wherein natural hazard risk assessment and decisions must be based on the best available information.

5. **CONCLUSION**

- 5.1 Kāinga Ora supports the approach the Council have taken towards natural hazard mapping, which Kāinga Ora considers is in accordance with the NPS-NH.



Lezel Beneke

Principal Development Planner, Kāinga Ora

2 April 2026