BEFORE THE HEARING PANEL
AT ROTORUA

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

AND

IN THE MATTER **of Proposed Plan Change 10 to the Operative Rotorua Lakes Council District Plan**

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

(CORPORATE)

5 October 2026

Instructed counsel:
Mary Hill
Barrister
Kate Sheppard Chambers
PO Box 5135,
Mount Maunganui South 3149
E: mary@maryhillbarrister.nz

Document Set ID: 23241826
Version: 1, Version Date: 05/10/2026

1. EXECUTIVE SUMMARY

1.1 My name is Brendon Scott Liggett. I hold the position of Manager - Development Planning within the Housing Delivery Group at Kāinga Ora – Homes and Communities ("**Kāinga Ora**") and am presenting this corporate evidence on behalf of Kāinga Ora.

1.2 The key points addressed in my evidence are:

(a) Overview of Kāinga Ora portfolio;

(b) Reasons for Kāinga Ora involvement in PC10;

(c) Community Group Housing Background; and

(d) Community Group Housing as a Residential Activity.

1.3 Kāinga Ora is generally supportive of the amendments to provisions sought in the 42A report. However, it considers that the relief recommended within the planning evidence of Ms Beneke [1] would provide an enhanced solution which will better enable Kāinga Ora to adequately and appropriately operate and manage Community Group Housing in Rotorua.

2. INTRODUCTION

2.1 My name is Brendon Scott Liggett. I hold the position of Manager - Development Planning within the Housing Delivery Group at Kainga Ora – Homes and Communities ("**Kainga Ora**"). I have the qualifications and experience set out in my 'Statement of Experience', included as **Attachment A** to this statement.

2.2 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 this plan change.

[1] Statement of evidence of Lezel Beneke, on behalf of Kāinga Ora Homes and Communities (Planning), 25 September 2026

2.3 I confirm that I am authorised to give corporate evidence on behalf of Kāinga Ora in respect of Rotorua Lakes District Council's Proposed Plan Change 10 ("**PC 10**").

3. OVERVIEW OF THE KĀINGA ORA PROPERTY PORTFOLIO

3.1 Kāinga Ora is currently the largest residential landlord in New Zealand, providing public housing[2] nationally to more than 200,000 people[3] who face barriers (for a number of reasons) to housing in the wider rental and housing market.

3.2 To this end:

(a) Kāinga Ora owns or manages more than 77,600[4] properties throughout New Zealand, including about 3,700 properties across the country operated by over 240 specialist Supported Housing Providers, either as Transitional Housing, or Community Group Housing.[5]

(b) Kāinga Ora has public housing in locations spread throughout Rotorua; managing a portfolio of approximately 1,086 [6] properties.

(c) In addition to the public housing portfolio, Kāinga Ora owns 83[7] properties that are managed by specialist Supported Housing Providers within Rotorua. These properties are residential activity and are generally considered to be residential units. There are, however, 20[8] properties that fall within a subset portfolio - Community Group Housing. These include homes supporting people with intellectual disabilities, people experiencing mental illness, homes used for women's refuge accommodation, and supporting residents with physical

[2] Public housing is an umbrella term for state housing and community housing.
[3] Kāinga Ora – Homes and Communities Annual Report 2024-2025
[4] Quarterly Report January – March 2026. Quarterly Report for 3 months ending 31 March 2026
[5] As at 10 August 2026 https://kaingaora.govt.nz/working-with-us/supported-housing/
[6] Managed stock by Territorial Local Authority as at 30 September 2025 https://kaingaora.govt.nz/en_NZ/publications/oia-and-proactive-releases/housing-statistics/
[7] As at 30 September 2026, source internal Kāinga Ora database report
[8] As at 30 September 2026, source internal Kāinga Ora database report

disabilities. These properties provide specialist housing that enables government funded support providers to deliver essential services to some of Rotorua's most vulnerable community members.

(d) The Community Group Housing portfolio provides safe, suitable homes for people with complex needs who require specialist support services. Kāinga Ora leases these properties to government-funded providers, who manage the homes and deliver tailored support to residents. While Kāinga Ora maintains the properties, the homes function primarily as residential accommodation, enabling residents to live safely and independently within residential neighbourhoods.

4. REASONS FOR KĀINGA ORA INVOLVEMENT IN PC10

4.1 Kāinga Ora has lodged submissions on PC10 to address its operational and development requirements within Rotorua, with a particular focus on the management and ongoing provision of Community Group Housing properties. These submissions seek to ensure that the planning framework appropriately recognises and supports the role of Community Group Housing in meeting the housing and support needs of vulnerable members of the community.

4.2 The Kāinga Ora submissions are intended to promote a planning framework that enables sustainable, inclusive, and well-functioning urban environments. In doing so, they support the development of thriving communities by ensuring that a diverse range of housing options can be provided to meet the varying needs of Rotorua residents.

5. COMMUNITY GROUP HOUSING

5.1 The Kāinga Ora Community Group Housing portfolio provides homes for people with complex needs whose wellbeing relies on both suitable housing and access to specialist support services. Kāinga Ora leases these homes to government funded providers who deliver tailored support within the home, enabling residents to live safely, independently and with dignity in their communities. These services cater to a diverse

Document Set ID: 23241826
Version: 1, Version Date: 05/10/2026

range of people, including adults with disabilities, individuals experiencing mental health or addiction challenges, children and young people in care, and women and children seeking refuge from family violence.

5.2 While Kāinga Ora is responsible for ensuring that Community Group Housing properties remain fit for purpose through regular property inspections, repairs, and maintenance; the day-to-day operation and management of these homes is undertaken by specialist support providers who lease these properties from Kāinga Ora. These providers deliver the services and support required by residents, tailored to their specific needs and circumstances. Kāinga Ora works closely with these providers to ensure that housing and support services are effectively integrated, and that the accommodation continues to meet the needs of both residents and service providers. This collaborative approach helps to ensure that appropriate housing environments are maintained and that residents receive the support necessary to live safely.

5.3 A key consideration is ensuring that planning provisions appropriately recognise that Community Group Housing is inherently a residential activity. While residents may receive varying levels of support, the primary function of these homes remains residential accommodation, with occupants living in a manner broadly consistent with other residential households. Planning provisions should therefore enable Community Group Housing to establish and operate within residential environments and be assessed having regard to effects that are comparable in nature and scale to other residential activities. This approach supports residents' access to appropriate housing and necessary support services, while recognising that Community Group Housing is an integral component of the residential housing continuum rather than a distinct institutional or commercial activity.

6. COMMUNITY GROUP HOUSING AS A RESIDENTIAL ACTIVITY

6.1 The Planning Evidence prepared by Ms Lezel Beneke comprehensively outlines the submission points of Kāinga Ora and identifies those matters that have been satisfactorily addressed through the s42A

Report. As set out in Ms Beneke's evidence, the resolved matters include the Community Housing definition, references to public safety within RESZ-07, RESZ-O14, and RESZ-O17, and the revisions made to Rule RESZ-R84 regarding its reference to "other residential activities".

6.2 The remaining issue in dispute is addressed in paragraphs 6.2 to 7.4 of the Planning Evidence. Ms Beneke concludes that RESZ-AC1 and RESZ-MDB already provide a robust and comprehensive framework for assessing the effects of larger-scale residential activities. In her opinion, there is no planning justification for the introduction of additional assessment criteria specific that apply specifically to Community Group Housing, particularly where those criteria seek to address behavioural or operational matters.

6.3 The Kāinga Ora Supported Housing portfolio comprises a range of residential accommodation types, including Community Group Housing. Where Community Group Housing falls within the proposed Community Housing definition recommended by Council officers, Kāinga Ora considers it should be assessed in the same manner as other residential activities of a comparable scale and intensity. As Community Housing is fundamentally residential in nature, Kāinga Ora considers that the existing assessment framework within RESZ-AC1 and RESZ-MDB is sufficient to address any relevant effects. Accordingly, Kāinga Ora does not support the introduction of additional assessment criteria directed toward the characteristics of residents or the operational delivery of support services, as these matters are not determinative of the activity's planning effects.

6.4 Given that Community Housing is fundamentally a residential activity, any assessment should be based on the actual effects generated by the activity, rather than the characteristics of its occupants or the nature of any support services provided. The existing assessment framework is therefore sufficient to appropriately manage potential effects while ensuring Community Housing is treated consistently with other forms of residential development.

Document Set ID: 23241826
Version: 1, Version Date: 05/10/2026

6.5 I note that in Ms Stevenson's planning evidence prepared for MCERT[9], she recommends a standard to be included for Visitor Accommodation operators to maintain a written complaints register relating to noise, waste, servicing, and other disturbances extending beyond site boundaries. While this matter does not directly affect the Kāinga Ora submissions, it highlights a potential issue should a similar requirement be contemplated for Community Group Housing.

6.6 Requirements such as maintaining complaints registers or monitoring complaints relating to matters beyond a site boundary are not supported by Kāinga Ora in relation to Community Housing activities. In my experience, complaints are inherently subjective and do not necessarily indicate the existence of adverse environmental effects beyond those reasonably anticipated within a residential environment. In my opinion any off-site effects are more appropriately assessed and managed through established planning provisions and compliance mechanisms, rather than through regulatory frameworks based on the recording of complaints. Such an approach risks imposing a level of scrutiny on Community Group Housing that is not generally applied to other residential activities generating comparable effects.

7. RMA REFORMS

7.1 Kāinga Ora also notes the 30 September 2026 amendments to the RMA and addition of section 104(1A) of the Resource Management Act. These amendments are due to be in force on or about 30 October 2026. Assuming those amendments are in force before decisions are issued on PC10, certain matters relating to the characteristics of people who occupy residential accommodation, and the effects associated with such characteristics, will no longer be relevant considerations in the assessment of resource consent applications. Kāinga Ora considers this further reinforces the appropriateness of an effects based assessment framework for Community Housing and supports reliance

[9] Planning Evidence prepared by Sarah Jane Stevenson, on behalf of the Ministry for Cities, Environment, Regions and Transport (MCERT), para 12.4

Document Set ID: 23241826
Version: 1, Version Date: 05/10/2026

on the existing provisions within RESZ-AC1 and RESZ-MDB rather than the introduction of additional criteria directed toward residents or the delivery of support services.

8. CONCLUSION

8.1 The Kāinga Ora Community Group Housing portfolio plays an important role in meeting the housing and support needs of vulnerable members of the community. As a fundamentally residential activity, it provides accommodation within residential neighbourhoods while enabling residents to access the support services they require. It is therefore important that the District Plan contains provisions that appropriately enable its establishment and ongoing operation.

8.2 Kāinga Ora considers that the amendments recommended through the section 42A Report, together with the retention of RESZ-AC1 and RESZ-MDB as the primary assessment framework, will provide an effective and efficient planning framework for Community Group Housing. The inclusion of additional assessment criteria directed at behavioural or operational matters is not justified, as the existing framework appropriately manages potential effects while ensuring Community Group Housing is treated consistently with other residential activities.

Brendon Liggett

5 October 2026

Document Set ID: 23241826
Version: 1, Version Date: 05/10/2026

ATTACHMENT A: STATEMENT OF EXPERIENCE – BRENDON LIGGETT

Brendon Scott Liggett:

I hold a Bachelor of Planning from the University of Auckland. I have held roles in the planning profession for more than 20 years and have been involved in advising on issues regarding the Resource Management Act 1991 ("RMA") and District Plans.

My experience includes four years in various planning roles within local government. For the past 17 years I have been employed by Kāinga Ora (including as Housing New Zealand).

I have been providing development planning expertise within Kāinga Ora (as Housing New Zealand) since 2006. In this role I have:

a) Undertaken identification and assessment of redevelopment land within the portfolio;

b) Provided input into the 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, and management of, the regulatory planning processes associated with Kāinga Ora residential development projects;

d) Managed 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 to the Plan Changes implementing the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act ("HSAA") and the National Policy Statement on Urban Development 2020 ("NPS-UD").

Document Set ID: 23241826
Version: 1, Version Date: 05/10/2026

Document Set ID: 23241826
Version: 1, Version Date: 05/10/2026