

Annexure A

Submission point	S42A Recommendation	Agree/Disagree	Proposed amendments	Justification
<p>310.6</p> <p>Add a new objective to 4.2- Residential Zone as the follows:</p> <p><i>Objective: To provide for a range of opportunities for affordable housing that enables low and moderate income people to live in the district in accommodation that suits their needs.</i></p>	Reject	Disagree	<p>I propose the following alternative wording:</p> <p><i>Objective – Housing choice</i></p> <p><i>There is a range of quality housing opportunities available to meet the diverse and changing population and housing needs of Waikato residents, including:</i></p> <ol style="list-style-type: none"> <i>I. a choice in housing types, densities and locations; and</i> <i>II. affordable, community and social housing and papakāinga.</i> <p>I also recommend that the following definitions be included in the PWDP to assist with interpretation of the above suggested objective and below suggested policies. Note that a definition of papakāinga has already been provided in the PWDP:</p> <p><i>Affordable housing:</i> <i>A home that a household could occupy for less than 30 percent of its income whether purchasing or renting;¹</i></p> <p><i>OR</i></p> <p><i>Housing options that are less than three times the annual Median Household Income (MHI) when calculated using the Median Multiple Measure (MMM). The MMM takes the median house price and divides it by the median annual gross pre-tax household income to obtain a measure of dwelling affordability.²</i></p> <p><i>Community housing:</i> <i>Means Residential Activity that maintains long term affordability for existing and future generations through the use of a Retention Mechanism, and whose cost to rent or own is within the reasonable means of low and moderate income households.³</i></p> <p><i>Social housing:</i> <i>Not-for-profit housing programmes that are supported and/or delivered by central or local government, or community housing providers, to help low income households and a range of other disadvantaged groups to</i></p>	<p>This wording has been based on that included in the operative Christchurch City Council District Plan⁵ and is considered appropriate as it provides for a range of housing typologies across the affordability spectrum.</p> <p>There may be scope to incorporate this wording (or words to similar effect) into Objective 4.2.16 – Housing Options of the PWDP.</p> <p>Inclusion of such an objective within the residential zone directly supports the reference to liveable and thriving communities noted in Objective 4.1.1 – strategic direction of the Urban Environment chapter of the PWDP, which contains the objectives and policies for urban areas within the district, including the Residential zone.</p>

¹ There is no nationally or internationally agreed definition of affordable housing. The United States and Canadian federal governments and many housing researchers use this definition or the “30/40 rule of thumb” variant of it, which focuses on the lowest 40 percent of income earning households. However, the definition above is a definition that is commonly used by housing researchers worldwide and measurable with New Zealand data - <http://knowledgeauckland.org.nz/assets/publications/Affordable-housing-in-Auckland-snapshot-Auckland-Council-Nov-2018.PDF>

² The Demographia International Housing Affordability Survey uses the “Median Multiple” (median house price divided by median annual gross pre-tax household income) to assess housing affordability. The Median Multiple is a house price to income ratio that is widely used for evaluating housing markets. It has been recommended by the World Bank and the United Nations and is used by the Joint Center for Housing Studies, Harvard University. <http://www.demographia.com/dhi.pdf>

³ <https://www.gldc.govt.nz/assets/Uploads/Planning/District-Plan/Proposed-District-Plan/PDP-Decisions-Version/Chapters/Chapter-2-Definitions-OCT-2019.pdf>

⁵ Chapter 3 Strategic Directions » 3.3 Objectives » 3.3.4 Objective - Housing capacity and choice <https://districtplan.ccc.govt.nz/pages/plan/book.aspx?exhibit=DistrictPlan>

			<i>access appropriate, secure and affordable housing. This can be of a supported nature such as addressing emergency housing issues, or of a more general assisted nature where low incomes in relation to housing costs may be the main issue.⁴</i>	
<p>310.7</p> <p>Add the following policies to 4.2- Residential Zone as follows (or words to similar effect):</p> <p><i>Policy 1: Enable affordable housing by allowing residential densities that make economical and best use of available land in existing residential areas.</i></p> <p><i>Policy 2: New housing developments will include affordable housing as part of the development plan.</i></p> <p><i>Policy 3: Allow access for developers of affordable housing to lower cost structure of consent and regulation requirements.</i></p> <p><i>Policy 4: Encourage multi-unit residential developments subject to appropriate safeguards to amenities and the environment.</i></p> <p><i>Policy 5: Take into account positive effects for the community of affordable housing when assessing resource consent applications.</i></p>	Reject	<p>Agree (in respect to WRAP's suggested Policy 3)</p> <p>Disagree with remainder of assessment</p>	<p>Whilst I agree with the intent of most policies put forward by WRAP in submission point 310.7, more appropriate policy wording is recommended below:⁶</p> <p><i>Policy 1: To provide opportunities for low and moderate income households to live in the District in a range of accommodation appropriate for their needs.</i></p> <p><i>Policy 2: To have regard to the extent to which density, height, or building coverage contributes to the affordability of residential activity.</i></p> <p><i>Policy 3: To enable the delivery of affordable, community, and social housing through voluntary retention mechanisms.</i></p>	<p>The s42A report rejected the relief sought in submission point 310.7 noting that the PWDP has been brought in line with the National Policy Statement – Urban Development Capacity (NPS-UDC) targets, and that the encouragement of multi-unit residential development is already contained within the objectives, policies and rules of the PWDP.</p> <p>I interpret the S42A planner's assessment to imply that suitable provision has been made for affordable housing within the PWDP already through density targets, and no further policy provisions are needed. I disagree with this assessment, noting recent research which questions whether the NPS-UDC is an effective tool in improving housing affordability⁷. This study has shown that the "evidence (upon which the NPS-UDC was founded) on the causes of decreasing housing affordability in New Zealand was biased and that the evidence itself was critically flawed. Consequently, the link between loosening planning constraints and improving housing affordability was found to be tenuous and the NPS-UDC was determined to be unlikely to be effective in improving housing affordability in New Zealand."</p> <p>It is therefore my view that simply providing for increased density or encouraging a range of housing typologies (as referenced in the PWDP objectives and policies relating to multi-unit development), will not address housing affordability unless provision for such is specifically made. As the objective and policies relating to housing options, types and multi-unit developments currently stand in the PWDP (4.2.16 – 4.2.18) there is no requirement for developers to consider affordability. I therefore recommend that policies around affordable housing are included in support of the suggested objective outlined in the amended wording for submission point 310.6. This would bring the PWDP in line with other Territorial Authorities addressing the matter of housing affordability through their district plans (namely Christchurch and Queenstown Lakes District Councils).</p> <p>Furthermore, whilst I agree with the inclusion of objectives and policies on multi-unit development contained elsewhere within the PWDP in facilitating a range of housing types, I note that the definition of multi-</p>

⁴ <https://ccc.govt.nz/the-council/plans-strategies-policies-and-bylaws/policies/community-policies/housing-policy>

⁶ Based on policies included in Queenstown Lakes District Plan.

⁷ McEwan, E. K. (2018). The National Policy Statement on Urban Development Capacity: An effective tool to improve housing affordability in New Zealand? (Thesis, Master of Planning). University of Otago. Retrieved from <http://hdl.handle.net/10523/8022>

				<p>unit development does not specifically include housing typologies which directly promote affordability e.g. co-housing developments.</p> <p>Co-housing is “intentional clustered housing with some common facilities and shared neighbourhood life.”⁸ Shared facilities within the community provides an opportunity for individual units to offer greater amenity than in a commercial property development. By removing the profit margin and by sharing resources, cohousing produces good quality housing at a more affordable price than commercial developments.⁹ This type of housing is becoming more popular as people look for creative ways to address housing affordability.¹⁰</p> <p>It is my opinion that the definition of multi-unit development should be expanded to include co-housing, and such an addition would support the general intent of suggested policies 1 and 3 included the proposed amendments.</p>
<p>310.11</p> <p>Amend Rule 16.4.1 RD1 (b) Subdivision - General by including the following:</p> <p><i>xi.) Positive effects for affordable housing.</i></p>	Reject	Agree in part	<p>Remove relief requested from subdivision rule and amend Policy 4.7.4 – Lot sizes to add the following wording (or wording to similar effect)</p> <p><i>Discourage non-compliance with minimum allotment sizes. However, where minimum allotment sizes are not achieved in urban areas, consideration will be given to whether any adverse effects are mitigated or compensated by providing:</i></p> <p><i>a. desirable urban design outcomes;</i></p> <p><i>b. greater efficiency in the development and use of the land resource;</i></p> <p><i>c. affordable or community housing.</i></p>	<p>I agree that this relief should be rejected in reference to the subdivision rules. However, in my opinion I believe it would be more appropriate to provide policy direction in respect of considering applications for affordable housing through subdivision. The suggested policy wording has been included in the Proposed Queenstown Lakes District Plan¹¹ and therefore a precedent has been set in terms of considering how affordable housing may be provided for in a District Plan.</p>
<p>310.2</p> <p>Amend Residential Zone Subdivision Multi-Unit Rule 16.4.4 RD1 (b), by including the following:</p> <p><i>(xi) Positive effects for affordable housing.</i></p>	Reject	Agree in part	As above	As above
<p>310.1</p>	Reject	Agree in part	<p>Remove relief requested from subdivision rule and amend equivalent land use rule (Rule 16.1.3 RD1) to provide for the requested reduction in minimum unit areas for multi-unit developments.</p>	<p>I agree with the s42A planner’s recommendation to reject this submission point but only on the basis that I believe it should not be captured in subdivision rules. I do not however agree with their rationale for rejecting the relief (for reasons already discussed in evidence), being</p>

⁸ <https://cohousing.org.nz/what-cohousing>

⁹ <http://cohaus.nz/>

¹⁰ <https://cohousing.org.nz/communities>

¹¹ <https://www.qldc.govt.nz/assets/Uploads/Planning/District-Plan/Proposed-District-Plan/PDP-Decisions-Version/Chapters/Chapter-27-Subdivision-and-Development-OCT-2019.pdf>

<p>Delete the minimum unit areas from Rule 16.4.4 RD1 (a) (iv) Multi-unit development.</p> <p>OR</p> <p>Amend Rule 16.4.4 RD1 (a) (iv) Multi-unit development by replacing the minimum unit areas with lower values for example Studio unit 30m², One bedroom unit 40m², Two Bedroom 50m², Three bedroom 70m².</p>				<p>that the PWDP cannot address affordable housing other than through ensuring there is sufficient developable land for residential purposes.</p> <p>As already mentioned, I believe housing affordability is better placed to be addressed through land use provisions, and therefore support submission point [471.45] made by CKL that minimum unit areas would more practically sit within Rule 16.1.3 RD1.</p> <p>The reason for my view on this is that subdivision is essentially concerned with the process of dividing land.¹² The construction of a multi-unit development in my opinion falls within the category of land use and therefore the relief sought would be better placed within Rule 16.3.1 RD1.</p>
<p>310.8</p> <p>Amend Rule 16.3.1 P1-Dwelling as follows:</p> <p><i>One dwelling within a site Two dwellings within a site, where the combined floor areas do not exceed 'X' percentage of the section.</i></p> <p>310.14</p> <p>Amend Rule 16.3.1 Dwelling, to allow more than one primary dwelling and one minor dwelling per site.</p> <p>310.9</p> <p>Add new rule to Rule, 16.3.1 P2 Dwelling as follows:</p> <p><i>(a) Three dwellings within a site, if at least two of the dwellings are small houses each with a gross floor area of less than 45m².</i></p>	<p>Reject the relief sought with respect to two dwellings, but recommend provision for infill development of one additional dwelling as a restricted discretionary activity</p>	<p>Agree in part</p>	<p>No proposed amendments.</p> <p>However, I suggest for consideration of the Hearings Panel the development of a framework that provides a more permissive route for increasing housing density on a site in instances where the developer is a registered/accredited provider of affordable, community and/or social housing, and that the housing to be provided is subject to a retention mechanism.</p> <p>Also, for further consideration, is increasing density through better utilisation of existing housing stock through the partitioning or conversion of existing houses or structures. This practice has been referred to as 'hidden homes' or a form of accessory dwelling unit. This would require amendment to Rule 16.3.1. through the addition of a permitted activity.</p>	<p>I agree with the s42A report that the provision of two dwellings on a site appropriately sits within the Restricted Discretionary category.</p> <p>If development of an alternative framework for registered/accredited providers of affordable housing is considered appropriate, including a retention mechanism to ensure affordability is maintained for future generations supports the purpose of the RMA 1991.</p> <p>In reference to 'hidden homes' or 'accessory dwelling units', a paper has been produced as part of the National Science Challenge – Building Better Homes Towns and Cities which explores options for implementation within a district planning framework.¹³</p>
<p>310.16</p> <p>Delete the setback requirement for garages in Rule 16.3.9.1 Building setbacks - All boundaries</p> <p>310.17</p>	<p>Reject</p>	<p>Agree</p>	<p>No amendments proposed</p>	<p>I agree with the s42A assessment.</p>

¹² <https://qualityplanning.org.nz/node/771>

¹³ https://www.buildingbetter.nz/publications/homes_spaces/adm/Saville-Smith_et_al_2017_ADU_Potential.pdf

<p>Delete Rule 16.3.9.1 P3 Building setbacks - All boundaries</p> <p>310.10</p> <p>Amend Rule 16.3.9.1 RD1 Building setbacks - All boundaries, to include the following:</p> <p><i>(v) (iii) Positive effects for affordable housing</i></p>				
<p>310.13</p> <p>Amend Rule 16.3.7 P1 (iii) Living court by changing the 80m2 requirement to 40m2.</p>	<p>Reject</p>	<p>Agree in part</p>	<p>Recommend allowing a reduction in living court only for those developments which are applied for as part of the alternative framework for registered/accredited providers of affordable, community and social housing which has been proposed for consideration.</p>	<p>I agree with the s42A recommendation, except where there is potential to explore an alternative framework as detailed in the proposed amendment. By providing only registered/accredited providers access to this more permissive framework, it would be anticipated that this type of development would not be on as widespread scale as development left to the private market.</p>