

BEFORE AN INDEPENDENT HEARINGS PANEL

THE PROPOSED WAIKATO DISTRICT PLAN (STAGE 1)

UNDER of the Resource Management Act 1991
(the Act)

IN THE MATTER
OF Hearing 10: Residential Zone

**STATEMENT OF EVIDENCE OF HANNAH OLIVIA PALMER FOR THE
WHAINGAROA RAGLAN AFFORDABLE HOUSING PROJECT (PLANNING)**

DATED 03 FEBRUARY 2020

1. INTRODUCTION

- 1.1 My full name is Hannah Olivia Palmer. I am an Environmental Consultant at Place Group Ltd (Place Group); a specialist resource management planning consultancy based in Hamilton. I have been in this position since May 2017.
- 1.2 I hold the qualification of Postgraduate Diploma in Resource and Environmental Planning obtained in 2011 from the University of Waikato. I also hold a Postgraduate Diploma in Earth Science and a Bachelor of Science from the University of Waikato. I am an Associate member of the New Zealand Planning Institute.
- 1.3 I have 8 years' planning experience and have previously held planning positions at Opus International Consultants, Latitude Planning, and Southland District Council where I have been involved in a range of resource management projects including preparation of evidence for the Proposed Auckland Unitary Plan, consent development and processing, and policy analysis.
- 1.4 I am authorised to present this evidence on behalf of the Whaingaroa Raglan Affordable Housing Project (WRAP), in support of its primary submission¹ on the Proposed Waikato District Plan (PWDP). I was not involved in the preparation of the submission made to the PWDP.

2. CODE OF CONDUCT

- 2.1 I can confirm that I am familiar with the Code of Conduct for Expert Witnesses as set out in the Environment Court Practice Note 2014. I have read and agree to comply with the Code. Except where I state that I am relying upon the specified evidence or advice of another person, my evidence is within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions I express.

3. WRAP SUBMISSIONS ON THE RESIDENTIAL ZONE

- 3.1 WRAP lodged 12 submission points in relation to the proposed objectives, policies and rules of the residential zone:

Provision	Submission point
4.2 - Residential zone <i>Objectives</i>	310.6
4.2 - Residential zone <i>Policies</i>	310.7
Rule 16.4.1 RD1 (b) Subdivision - General	310.11
Residential Zone Subdivision Multi-Unit Rule 16.4.4 RD1 (b)	310.2
Rule 16.4.4 RD1 (a) (iv) Multi-unit development	310.1

¹ Submission #310

Rule 16.3.1 - Dwelling	310.8 310.14 310.9
Rule 16.3.9.1 – Building setbacks	310.16 310.17 310.10
Rule 16.3.7 P1 (iii) Living court	310.13

4. SCOPE OF EVIDENCE

4.1 My evidence addresses the following:

- a) Whether it is appropriate for affordable housing provisions to be included in the PWDP
- b) Relief sought by WRAP and proposed amendments to that relief
- c) Justification/evidence for the relief sought

5. THE SECTION 42A REPORT

5.1 I have reviewed the Hearing 10: Residential Zone s42A report and the reporting officer's recommendations in relation to WRAP's submission points. For clarity, **Annexure A** provides a table of WRAP's submission points, and states whether the s42A report recommendation is agreed or disagreed with and provides proposed amendments which I consider to be more appropriate along with supporting justification.

5.2 The s42A report takes the overall stance that the District Plan is not an appropriate place to address housing affordability due to the complex nature of the variables that contribute to this issue, other than to ensure sufficient land is available for development. The s42A planner therefore recommends that all relief sought by WRAP in relation to submission #310 should be rejected.

5.3 Whilst I agree with the s42A planner that affordable housing is a complex matter which includes influences outside the District Plan, I disagree that the submission points should be rejected entirely. Within New Zealand, Christchurch City Council and Queenstown Lakes District Council are two examples of Territorial Local Authorities that have taken on the challenge of addressing housing affordability by including provisions in their district plans around this subject,

demonstrating that it can be done. Furthermore, literature points to regulatory tools as being an important part of the wider solution to addressing housing affordability.²³⁴

6. IS IT APPROPRIATE FOR AFFORDABLE HOUSING PROVISIONS TO BE INCLUDED IN THE PWDP?

- 6.1 In my opinion, it is entirely appropriate for affordable housing provisions to be included in the PWDP. A recent report released as part of the National Science Challenge – Building Better Homes Towns and Cities comments that *“when a dwelling costs more than what an individual or household can afford, the security that it provides is undermined and it becomes an arena of material struggle. It is associated with under-investment in many of the goods and services that generate wellbeing, it contracts rather than expands life chances, and makes precarious social, cultural and economic participation.”*⁵ In addition, access to secure and affordable housing has positive outcomes for health, education, social, economic, and cultural wellbeing, and is a contributing factor to a well-functioning society.⁶ In my opinion, this directly supports the purpose of the Resource Management Act 1991 (RMA) (Part 2, Section 5), which is to promote the **sustainable management** of natural and **physical resources**.
- 6.2 **Sustainable management** means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic, and cultural well-being and for their health and safety (underline added for emphasis).
- 6.3 The definition of natural and **physical resources** provided in the RMA includes **all structures**.⁷ **Structure** means any building, equipment, device, or other facility made by people and which is fixed to land; and includes any raft.⁸ This makes it clear, in my view, that housing is included as a physical resource under the RMA.
- 6.4 Further direction is also given in Part 2, Section 5(a) which talks about sustaining the potential of physical resources to meet the reasonably foreseeable needs of future generations. In the context of affordable housing, my interpretation of Section 5(a) is that there needs to be a mechanism in place in the PWDP to ensure the affordability of housing is retained. Doing so ensures the potential of this resource is sustained for future generations.

² <https://www.brookings.edu/wp-content/uploads/2016/06/housingreview.pdf>

³ https://www.buildingbetter.nz/publications/homes_spaces/adm/Saville-Smith_et_al_2017_ADU_Potential.pdf

⁴ <https://www.lgnz.co.nz/equip/training/on-demand-webinars/affordable-housing-making-it-happen/>

⁵ Revitalising the Production of Affordable Housing for Productive, Engaged & Healthy Lives
https://www.buildingbetter.nz/publications/homes_spaces/Saville-Smith_Nov2019_revitalising_production_affordable_housing.pdf

⁶ *Ibid.*

⁷ RMA 1991 – Part 1, Section 2(1)

⁸ *Ibid.*

7. ANALYSIS OF RELIEF SOUGHT BY WRAP, PROPOSED AMENDMENTS AND JUSTIFICATION

7.1 WRAP have sought a variety of changes to the objectives, policies and rules framework of PWDP chapters 4 and 16 in relation to the Residential zone. The submission points presented by WRAP primarily focus on:

- a) ensuring Waikato District Council has the ability to consider housing affordability when assessing resource consent applications (through objectives, policies and matters of discretion); and
- b) allowing efficient use of land by maximising site potential through reductions in building setbacks, decreasing the size of living courts and minimum floor area for multi-unit developments, and increasing the number of dwellings allowed on a site.

7.2 I support the general intent of the submission points made by WRAP however I provide some amendments to that relief which I consider to be more appropriate. These amendments as well as evidence/justification for the suggestions are provided in **Annexure A**.

8. AREAS FOR FURTHER CONSIDERATION

8.1 Although outside the scope of the submission, to truly address housing affordability, it needs to be recognised that a range of measures will need to be investigated and implemented by Waikato District Council, some of which will sit outside of the PWDP. In addition to the proposed amendments contained in **Annexure A**, the following areas could be considered as part of a wider programme to address housing affordability:

- a) **Disincentivising visitor accommodation** - In areas where it has been identified that short term rental of houses on platforms such as Airbnb and Bookabach is affecting the ability of residents to find permanent/long term accommodation within townships (i.e. Raglan), it is recommended that a consenting framework is explored to manage this activity. This may involve requiring a resource consent to operate short term visitor accommodation and would likely fall under homestay and commercial activity rules. By requiring people to obtain consent for this activity, it may help to increase the number of dwellings available for permanent rental. Maximum occupancy nights could be explored as a trigger for consent.
- b) **Development of a Waikato District Affordable Housing Policy** which sets an overarching vision for the district and articulates how Council will deliver on this vision as well as other initiatives supported by Council such as the Waikato Plan – Regional Housing Initiative Working Group, and the Whaingaroa Raglan Housing Affordability Project. A local authority which

has undertaken considerable work in this area is Christchurch City Council - their Housing Policy contains a list of Priority Policy Action Areas which provides a good starting base.⁹

- c) **Development contributions** - Waive or reduce development contributions for affordable housing developments. Christchurch City Council has implemented this policy to encourage small residential units and social housing, and the amount of rebate given is apportioned on a sliding scale that corresponds to gross floor area, as well as being able to meet certain criteria.¹⁰
- d) **Explore additional criteria for assessment of new comprehensive greenfield subdivision and land use applications** over X lots. Such applications should include a 'housing needs assessment' that demonstrates consideration of demographics, the type of housing needed in the locality and how X% of the subdivision will cater to this community need. Some of this work exploring demographics and housing demand has already been completed as part of the Waikato Plan – Waikato Regional Housing Initiative.¹¹
- e) **Rates rebate** for landowners where rental units are offered below market rent, and for landowners where a house is purchased through a recognised assisted home ownership scheme.

9. CONCLUDING REMARKS

- 9.1 Territorial Authorities around New Zealand are making headway in addressing the issue of housing affordability, setting the precedent for inclusion of provisions in their district plans as part of the wider solution.
- 9.2 Incentivising affordable housing directly supports the purpose of the RMA 1991, and although a complex topic, it is in my opinion appropriate to address through the district planning framework.
- 9.3 A wider programme of measures will also be required to fully begin addressing the issue of housing affordability, and I encourage the Waikato District Council to explore what other support could be offered.

⁹ <https://ccc.govt.nz/the-council/plans-strategies-policies-and-bylaws/policies/community-policies/housing-policy>

¹⁰ <https://ccc.govt.nz/consents-and-licences/development-contributions/development-contributions-rebate-schemes>

¹¹ <http://waikatoplan.co.nz/assets/Waikato-Plan/Projects/Final-Housing-Stocktake-Report-minor-change-6-September-2019.pdf>

Hannah Palmer

Hannah Olivia Palmer

03/02/2020