

## Proposed Housing Accord Policy Submissions

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★ The online system was held open until Sunday, this person completed their submission Saturday.

## Proposed Housing Accord Policy

### Do you agree that Council should have a Housing Accord Policy?

Yes

### Please explain why you think Council should/should not have a Housing Accord Policy?

Yes Council should have a housing policy, which this essentially is, but it should not be backgrounded by misleading and partial information.

Number 2. In the 'Background and Intent' section states: "Housing affordability is affected by the rate and extent of land and housing supply" - Its also affected by a raft of other measures, none of which are addressed in this flimsy document.

All this is doing is trying to bypass the RMA, the cornerstone of not fucking our country over. We're going to be tearing up the best dairy land in the country to build more sprawl, put more strain on our cities resources and its infrastructure when we could be building up, not out and removing zoning and height restrictions in areas to intensify and modernize our city.

The document claims it will lower house prices but gives NO indication or parameters of how this will be achieved that are founded in any research. It sets no concrete targets which could be measured at a later date and is a classic example of an excuse to cut red tape to increase rates take and line the pockets of developers while throwing ratepayer money at sprawl.

The document states that "Development of SHAs will achieve high quality urban design outcomes." - What are these standards? These are not stated and no indication given of how this will be measured or against which recognised standard, apart from the building code?

Affordability, homes need to be made available to first home buyers on a rent to won scheme. Figures need to be set by Council for 20% of housing to be available for this purpose. Saying "The potential for a development to target specific housing need e.g. first home buyers, the rental market or social housing;" is ridiculous. Anything good that could possibly come from this document to help benefit society is a maybe and nice to have and a potential. Get some guts and do the right thing.

The building height at 6 storeys is good. If you go ahead with this, ensure most are built to this height. 80%.

## Policy Principles

*Section 14 of the proposed policy lists the proposed principles that will be promoted by Council when implementing the Housing Accord Policy.*

### Do you agree with the proposed policy principles?

No

**Please tick any of the principles below that you DO NOT agree with.** *Please select all that apply*

### Please explain why you don't agree with the principles above, or provide an alternative to the proposed principle. *(Please reference A. B. C. etc)*

Yes Council should have a housing policy, which this essentially is, but it should not be backgrounded by misleading and partial information.

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**Do you have any suggested additional principles you think should be added?**

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## Policy Outcomes & Selection Process

Section 15 of the proposed policy lists the intended outcomes that Council will seek to achieve by implementing the proposed Housing Accord Policy. Sections 16 to 25 of the proposed policy sets out how Council is proposing to call for and process SHA applications.

### Do you agree with the proposed policy outcomes?

No

**Please tick any of the outcomes below that you DO NOT agree with.** *Please select all that apply*

### **Please explain why you don't agree with the outcomes above, or provide an alternative to the proposed outcome.** *(Please reference A. B.C. etc)*

Yes Council should have a housing policy, which this essentially is, but it should not be backgrounded by misleading and partial information.

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### **Do you have any suggested additional outcomes you think should be added?**

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The building height at 6 storeys is good. If you go ahead with this, ensure most are built to this height. 80%.

**Do you agree with the proposed process regarding the selection of SHAs?**

No

**Please explain why you agree/disagree.**

Its just a document to bypass the RMA and create sprawl

## Evaluation Framework

*The Housing Accord and Special Housing Areas Act 2013 (HASHA Act) prescribes a number of mandatory selection criteria for housing developments within SHAs. Council has the option to set more criteria to guide the selection of SHA in Hamilton.*

*In Schedule 1 of the proposed policy, Council is proposing 4 additional criteria which are:*

1. *Location*
2. *Affordability*
3. *Required minimum number of dwellings*
4. *Determining which residential development rules will apply to SHA development*

**Schedule 2 of the proposed policy lists areas that ARE NOT suitable for the establishment of SHA's.**

**Please tick any of the areas below that you think should not be included in Schedule 2.** *Please select all that apply*

**Please explain why you think the areas indicated above are suitable for SHA.**

**Section A6 of the proposed policy requires that SHA's provide a proportion of affordable dwelling, largely determined by the type and size of the dwellings and sections. Do you agree this criteria will enable the supply of comparatively affordable houses?** *Please select only one item*

No

**Please explain why you agree/disagree.**

Not at all. Any properties that are to be sold to non owner-occupiers should be rent controlled. Properties should be made available on a 'rent to own' basis with priority given to people on Housing NZ waiting lists and first home buyers. Targets must be set.

**Section A6 of the proposed policy also encourages collaborative schemes with Housing New Zealand and Registered SHPs and partnerships between the public and the private housing sectors. Do you agree that the policy should specifically encourage collaboration between social housing providers and private developers?** *Please select only one item*

No

**Please explain why you agree/disagree.**

Social housing should be provided by council and by government.

**Section A8 of the proposed policy proposed that SHA will be required to contain a minimum number of 10 dwellings. Do you agree with this criteria? Please select only one item**

No

**Please explain why you agree/disagree.**

They should contain a greater number of multi-storey dwellings.

**The minimum number of dwellings criteria will not apply to Housing New Zealand or registered Social Housing providers. Do you agree with this criteria? Please select only one item**

No

**Please explain why you agree/disagree.**

They should contain a greater number of multi-storey dwellings.

**The proposed policy proposes an approach (section A11) to determining which of the existing residential development rules in the Partly Operative District Plan will apply to SHAs. Do you agree with the approach in Section A11? Please select only one item****Please explain why you agree/disagree.****Do you have any other comments or feedback about any other aspects of the proposed Housing Accord policy?****Hearings and Contact Information**

**Do you wish to speak in support of your submission at a Council hearing?** *If you don't want to speak at the hearing, but would like staff to know who this submission is from, you are welcome to fill in the Contact Details section.*

No

**Are you responding as:** NGO, community group and/or social housing provider

**What is your name?** Max Coyle

**What is your organisation?** Hamilton Future Foundation

**Where do you live?**

I am a Hamilton City resident, my suburb is: Dinsdale

or

I live outside the Hamilton boundary, my Council District is:

## Proposed Housing Accord Policy

### Do you agree that Council should have a Housing Accord Policy?

Yes

### Please explain why you think Council should/should not have a Housing Accord Policy?

identifying the area for housing Accord and advising local rate payers about it so that any new purchase can be made via informed decision. I would suggest that we should avoid low cost housing or heavy populated zone.

## Policy Principles

*Section 14 of the proposed policy lists the proposed principles that will be promoted by Council when implementing the Housing Accord Policy.*

### Do you agree with the proposed policy principles?

Yes

### Please tick any of the principles below that you DO NOT agree with. Please select all that apply

- I- Development within SHAs will occur as quickly as practicable.
- J- Development of SHAs will achieve high quality urban design outcomes.

### Please explain why you don't agree with the principles above, or provide an alternative to the proposed principle. (Please reference A. B. C. etc)

we need to maintain good quality housing with about 500 sq meter instead of clogging up the street with more number of small dwellings.

### Do you have any suggested additional principles you think should be added?

## Policy Outcomes & Selection Process

*Section 15 of the proposed policy lists the intended outcomes that Council will seek to achieve by implementing the proposed Housing Accord Policy. Sections 16 to 25 of the proposed policy sets out how Council is proposing to call for and process SHA applications.*

### Do you agree with the proposed policy outcomes?

Yes

### Please tick any of the outcomes below that you DO NOT agree with. Please select all that apply

### Please explain why you don't agree with the outcomes above, or provide an alternative to the proposed outcome. (Please reference A. B.C. etc)

### Do you have any suggested additional outcomes you think should be added?

### Do you agree with the proposed process regarding the selection of SHAs?

Yes

### Please explain why you agree/disagree.

## Evaluation Framework

*The Housing Accord and Special Housing Areas Act 2013 (HASHA Act) prescribes a number of mandatory selection criteria for housing developments within SHAs. Council has the option to set more criteria to guide the selection of SHA in Hamilton.*

*In Schedule 1 of the proposed policy, Council is proposing 4 additional criteria which are:*

5. Location
6. Affordability



7. *Required minimum number of dwellings*
8. *Determining which residential development rules will apply to SHA development*

**Schedule 2 of the proposed policy lists areas that ARE NOT suitable for the establishment of SHA's. Please tick any of the areas below that you think should not be included in Schedule 2. Please select all that apply**

**Please explain why you think the areas indicated above are suitable for SHA.**

**Section A6 of the proposed policy requires that SHA's provide a proportion of affordable dwelling, largely determined by the type and size of the dwellings and sections. Do you agree this criteria will enable the supply of comparatively affordable houses? Please select only one item**

No

**Please explain why you agree/disagree.**

**Section A6 of the proposed policy also encourages collaborative schemes with Housing New Zealand and Registered SHPs and partnerships between the public and the private housing sectors. Do you agree that the policy should specifically encourage collaboration between social housing providers and private developers? Please select only one item**

Yes

**Please explain why you agree/disagree.**

**Section A8 of the proposed policy proposed that SHA will be required to contain a minimum number of 10 dwellings. Do you agree with this criteria? Please select only one item**

No

**Please explain why you agree/disagree.**

it doesn't say minimum size of dwelling.

**The minimum number of dwellings criteria will not apply to Housing New Zealand or registered Social Housing providers. Do you agree with this criteria? Please select only one item**

No

**Please explain why you agree/disagree.**

all houses in area to be build to similar spec and size. so the valuation is maintained in the market for that particular street/area.

**The proposed policy proposes an approach (section A11) to determining which of the existing residential development rules in the Partly Operative District Plan will apply to SHAs. Do you agree with the approach in Section A11? Please select only one item**

Yes

**Please explain why you agree/disagree.**

**Do you have any other comments or feedback about any other aspects of the proposed Housing Accord policy?**

**Hearings and Contact Information**

**Do you wish to speak in support of your submission at a Council hearing? If you don't want to speak at the hearing, but would like staff to know who this submission is from, you are welcome to fill in the Contact Details section.**

Yes

**Are you responding as:** Individual

**What is your name?** adip desai

**What is your organisation?**

**Where do you live?**

I am a Hamilton City resident, my suburb is: Huntington

or

I live outside the Hamilton boundary, my Council District is:

## Proposed Housing Accord Policy

### Do you agree that Council should have a Housing Accord Policy?

Yes

### Please explain why you think Council should/should not have a Housing Accord Policy?

given the difficulty with finding houses to rent and purchase, this seems necessary

## Policy Principles

*Section 14 of the proposed policy lists the proposed principles that will be promoted by Council when implementing the Housing Accord Policy.*

### Do you agree with the proposed policy principles?

Yes

### Please tick any of the principles below that you DO NOT agree with. Please select all that apply

E- Council will enable land within SHAs to be used to deliver a range of housing types to the market at different price points in order to achieve the purpose of HASHAA.

### Please explain why you don't agree with the principles above, or provide an alternative to the proposed principle. (Please reference A. B. C. etc)

E - The focus of SHA needs to be on providing low cost housing for the vulnerable. my concern is that this principle will open the door for more higher cost housing, further inflating house prices.

### Do you have any suggested additional principles you think should be added?

low cost, affordable housing and social housing to be the primary focus of this policy however quality of housing is also a priority - well designed, well insulated, accessible

the environment needs to be respected and valued at all stages of the process - eg. land should not be 'freed up' that has cultural significance, building practices that

accessibility - houses need to be designed to ensure people with disabilities are able to use them. this is a future proofing for Hamilton City housing stock

## Policy Outcomes & Selection Process

*Section 15 of the proposed policy lists the intended outcomes that Council will seek to achieve by implementing the proposed Housing Accord Policy. Sections 16 to 25 of the proposed policy sets out how Council is proposing to call for and process SHA applications.*

### Do you agree with the proposed policy outcomes?

Yes

### Please tick any of the outcomes below that you DO NOT agree with. Please select all that apply

### Please explain why you don't agree with the outcomes above, or provide an alternative to the proposed outcome. (Please reference A. B.C. etc)

### Do you have any suggested additional outcomes you think should be added?

### Do you agree with the proposed process regarding the selection of SHAs?

Yes

### Please explain why you agree/disagree.

## Evaluation Framework

*The Housing Accord and Special Housing Areas Act 2013 (HASHA Act) prescribes a number of mandatory selection criteria for housing developments within SHAs. Council has the option to set more criteria to guide the selection of SHA in Hamilton.*

*In Schedule 1 of the proposed policy, Council is proposing 4 additional criteria which are:*

9. Location
10. Affordability
11. Required minimum number of dwellings
12. Determining which residential development rules will apply to SHA development

**Schedule 2 of the proposed policy lists areas that ARE NOT suitable for the establishment of SHA's. Please tick any of the areas below that you think should not be included in Schedule 2.** *Please select all that apply*

**Please explain why you think the areas indicated above are suitable for SHA.**

**Section A6 of the proposed policy requires that SHA's provide a proportion of affordable dwelling, largely determined by the type and size of the dwellings and sections. Do you agree this criteria will enable the supply of comparatively affordable houses?** *Please select only one item*

No

**Please explain why you agree/disagree.**

further criteria are required to ensure developers are creating affordable dwellings. the marketplace isn't regulating price therefore council needs to

**Section A6 of the proposed policy also encourages collaborative schemes with Housing New Zealand and Registered SHPs and partnerships between the public and the private housing sectors. Do you agree that the policy should specifically encourage collaboration between social housing providers and private developers?** *Please select only one item*

Yes

**Please explain why you agree/disagree.**

housing NZ are not creating sufficient housing for the demand. the government are not doing enough to address homelessness so council needs to step in

**Section A8 of the proposed policy proposed that SHA will be required to contain a minimum number of 10 dwellings. Do you agree with this criteria?** *Please select only one item*

Yes

**Please explain why you agree/disagree.**

quantity of housing is important

**The minimum number of dwellings criteria will not apply to Housing New Zealand or registered Social Housing providers. Do you agree with this criteria?** *Please select only one item*

No

**Please explain why you agree/disagree.**

**The proposed policy proposes an approach (section A11) to determining which of the existing residential development rules in the Partly Operative District Plan will apply to SHAs. Do you agree with the approach in Section A11?** *Please select only one item*

**Please explain why you agree/disagree.**

**Do you have any other comments or feedback about any other aspects of the proposed Housing Accord policy?**

## Hearings and Contact Information

**Do you wish to speak in support of your submission at a Council hearing?** *If you don't want to speak at the hearing, but would like staff to know who this submission is from, you are welcome to fill in the Contact Details section.*

No

**Are you responding as:** Individual

**What is your name?**

**What is your organisation?**

**Where do you live?**

I am a Hamilton City resident, my suburb is: Fairfield

or

I live outside the Hamilton boundary, my Council District is:

## Proposed Housing Accord Policy

### Do you agree that Council should have a Housing Accord Policy?

Yes

### Please explain why you think Council should/should not have a Housing Accord Policy?

New sections means more people can build new 'homes' and stop fighting fore existing houses

## Policy Principles

*Section 14 of the proposed policy lists the proposed principles that will be promoted by Council when implementing the Housing Accord Policy.*

### Do you agree with the proposed policy principles?

Yes

**Please tick any of the principles below that you DO NOT agree with.** *Please select all that apply*

**Please explain why you don't agree with the principles above, or provide an alternative to the proposed principle.** *(Please reference A. B. C. etc)*

### Do you have any suggested additional principles you think should be added?

I: Please make sure and explain how we are going to make sure that development start as early ? can we impose more tax on undeveloped residential zones ? or take residential status away if no development takes place in an year or 6months ?

## Policy Outcomes & Selection Process

*Section 15 of the proposed policy lists the intended outcomes that Council will seek to achieve by implementing the proposed Housing Accord Policy. Sections 16 to 25 of the proposed policy sets out how Council is proposing to call for and process SHA applications.*

### Do you agree with the proposed policy outcomes?

Yes

**Please tick any of the outcomes below that you DO NOT agree with.** *Please select all that apply*

**Please explain why you don't agree with the outcomes above, or provide an alternative to the proposed outcome.** *(Please reference A. B.C. etc)*

### Do you have any suggested additional outcomes you think should be added?

### Do you agree with the proposed process regarding the selection of SHAs?

Yes

**Please explain why you agree/disagree.**

## Evaluation Framework

*The Housing Accord and Special Housing Areas Act 2013 (HASHA Act) prescribes a number of mandatory selection criteria for housing developments within SHAs. Council has the option to set more criteria to guide the selection of SHA in Hamilton.*

*In Schedule 1 of the proposed policy, Council is proposing 4 additional criteria which are:*

13. Location
14. Affordability
15. Required minimum number of dwellings
16. Determining which residential development rules will apply to SHA development

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**Please explain why you think the areas indicated above are suitable for SHA.**

**Section A6 of the proposed policy requires that SHA's provide a proportion of affordable dwelling, largely determined by the type and size of the dwellings and sections. Do you agree this criteria will enable the supply of comparatively affordable houses? *Please select only one item***

Yes

**Please explain why you agree/disagree.**

**Section A6 of the proposed policy also encourages collaborative schemes with Housing New Zealand and Registered SHPs and partnerships between the public and the private housing sectors. Do you agree that the policy should specifically encourage collaboration between social housing providers and private developers? *Please select only one item***

Yes

**Please explain why you agree/disagree.**

**Section A8 of the proposed policy proposed that SHA will be required to contain a minimum number of 10 dwellings. Do you agree with this criteria? *Please select only one item***

Yes

**Please explain why you agree/disagree.**

**The minimum number of dwellings criteria will not apply to Housing New Zealand or registered Social Housing providers. Do you agree with this criteria? *Please select only one item***

**Please explain why you agree/disagree.**

**The proposed policy proposes an approach (section A11) to determining which of the existing residential development rules in the Partly Operative District Plan will apply to SHAs. Do you agree with the approach in Section A11? *Please select only one item***

Yes

**Please explain why you agree/disagree.**

**Do you have any other comments or feedback about any other aspects of the proposed Housing Accord policy?**

## Hearings and Contact Information

**Do you wish to speak in support of your submission at a Council hearing? *If you don't want to speak at the hearing, but would like staff to know who this submission is from, you are welcome to fill in the Contact Details section.***

Yes

**Are you responding as:** Individual

**What is your name?** JOMI GREGORY

**What is your organisation?**

**Where do you live?**

I am a Hamilton City resident, my suburb is: Hamilton Central

or

I live outside the Hamilton boundary, my Council District is:

## Proposed Housing Accord Policy

### Do you agree that Council should have a Housing Accord Policy?

No

### Please explain why you think Council should/should not have a Housing Accord Policy?

The council already has a system for consents and permits. To add another does not make sense. Either the current consent process works or if not needs tuning, adding another is not the answer. I presume a SHA would require a different (lower) standard to be met in order to gain consent. We have already been through a process to get the current system we have. The result of a SHA will be part of the city for the next 50 to 100 years and should not be a compromise in order to allow larger developers an advantage over smaller builders and projects. The supposed benefit of a few 2 bedroom units at a small price difference for 1st home buyers does not make sense either. Would a 2 bedroom unit suit a young family looking to buy their first home? The SHA idea looks to be a political idea to make it look as if something is being done about the current house affordability problem.

### Policy Principles

*Section 14 of the proposed policy lists the proposed principles that will be promoted by Council when implementing the Housing Accord Policy.*

### Do you agree with the proposed policy principles?

No

### Please tick any of the principles below that you DO NOT agree with. Please select all that apply

- C- Council will work collaboratively with private housing providers ('PHPs'), social housing providers ('SHPs') and the Government to increase housing supply and opportunities for affordable housing.
- E- Council will enable land within SHAs to be used to deliver a range of housing types to the market at different price points in order to achieve the purpose of HASHAA.
- G- Where Council's strategic infrastructure networks are unavailable to an SHA for any reason, including but not limited to lack of network capacity or connectivity, all necessary infrastructure will be provided and funded by the developer at no cost to Council.
- H- Development within SHAs will be consistent with the evaluation criteria and objectives set out in the schedules to this Policy. Priority will be given to establishing SHAs that are consistent with the strategic direction set within the Partly Operative District Plan ('PODP').
- I- Development within SHAs will occur as quickly as practicable.
- J- Development of SHAs will achieve high quality urban design outcomes.

### Please explain why you don't agree with the principles above, or provide an alternative to the proposed principle. (Please reference A. B. C. etc)

- C. I do not believe this will give more and significant improvement in affordability.
- E. The developer will still be looking to maximise return at lowest cost. The highest price the market will stand will be the price. The lowest value houses will be in the least desirable part of the development and will be the last to be built.
- G. Recent history has many examples of private enterprise providing inadequate infrastructure because the motivation is to supply a system based on lowest price rather than on required performance.
- H. The PODP is the lowest ranking document and can be overridden by the Act so really means nothing.
- I. Act in haste, repent at leisure. Rushing through approvals for poorly planned projects delivers poor results for the end user. If the project was well planned there would be no need to use the provisions under a SHA.
- J. Development within the current framework is more likely to achieve a high quality urban design outcome. Expecting any improvement to what we get now out of a watered down system is simply ludicrous.



**Do you have any suggested additional principles you think should be added?**

1. The consent is only valid to the original applicant and cannot be on sold.
2. Strict time limits on how long the consent is active.
3. A requirement that the supposed affordable housing is the first to be built and sold before allowing the rest of the development to proceed. In other words, the supposed benefits are realised before the project is allowed to proceed to completion

**Policy Outcomes & Selection Process**

*Section 15 of the proposed policy lists the intended outcomes that Council will seek to achieve by implementing the proposed Housing Accord Policy. Sections 16 to 25 of the proposed policy sets out how Council is proposing to call for and process SHA applications.*

**Do you agree with the proposed policy outcomes?**

No

**Please tick any of the outcomes below that you DO NOT agree with. Please select all that apply**

- A- Create certainty in respect of Councils approach to Special Housing Areas (SHAs) which assists the development community in making investment decisions;
- B- In collaboration with the development community, give effect to the Hamilton Housing Accord and its targets for land supply and housing.

**Please explain why you don't agree with the outcomes above, or provide an alternative to the proposed outcome. (Please reference A. B.C. etc)**

A. The development community already has the certainty of the current framework to assist with making investment decisions.

B. Land cannot be created. Any land is already there and available within the current framework. The checks and balances to use land for housing may be more adequate under the existing framework.

**Do you have any suggested additional outcomes you think should be added?**

The end result is equivalent or better than any outcome under the current system.

**Do you agree with the proposed process regarding the selection of SHAs?**

No

**Please explain why you agree/disagree.**

No detail given other than - "Council will openly engage with the community on the identification of the identification of potential areas in the City for consideration as SHAs." This open ended and means nothing.

**Evaluation Framework**

*The Housing Accord and Special Housing Areas Act 2013 (HASHA Act) prescribes a number of mandatory selection criteria for housing developments within SHAs. Council has the option to set more criteria to guide the selection of SHA in Hamilton.*

*In Schedule 1 of the proposed policy, Council is proposing 4 additional criteria which are:*

17. Location
18. Affordability
19. Required minimum number of dwellings
20. Determining which residential development rules will apply to SHA development

**Schedule 2 of the proposed policy lists areas that ARE NOT suitable for the establishment of SHA's.**

**Please tick any of the areas below that you think should not be included in Schedule 2. Please select all that apply**

**Please explain why you think the areas indicated above are suitable for SHA.**

**Section A6 of the proposed policy requires that SHA's provide a proportion of affordable dwelling, largely determined by the type and size of the dwellings and sections. Do you agree this criteria will enable the supply of comparatively affordable houses?** *Please select only one item*

No

**Please explain why you agree/disagree.**

"a. The type and size of dwellings to be built by PHPs: in all SHAs at least 20% of dwellings will comprise two bedroom dwellings of 150m<sup>2</sup> gross floor area or less unit size.

b. The size of sections created by PHPs: PHPs will be required to provide at least 20% of the allotments at smaller sizes of 350m<sup>2</sup> or less."

This is the type of development currently targeted at small investors to get into the property rental business. This does not target affordable houses nor young family first home buyers.

**Section A6 of the proposed policy also encourages collaborative schemes with Housing New Zealand and Registered SHPs and partnerships between the public and the private housing sectors. Do you agree that the policy should specifically encourage collaboration between social housing providers and private developers?** *Please select only one item*

No

**Please explain why you agree/disagree.**

This weighted far too far in favour of developer. 80% + benefit to the private developer with social housing getting a small discount on the remaining 20%.

**Section A8 of the proposed policy proposed that SHA will be required to contain a minimum number of 10 dwellings. Do you agree with this criteria?** *Please select only one item*

No

**Please explain why you agree/disagree.**

Because of the reduced requirements upon the developer, by only applying this to larger developments, will emphasis negative outcomes. Instead of having small failures, the failures and fix ups required will be larger.

**The minimum number of dwellings criteria will not apply to Housing New Zealand or registered Social Housing providers. Do you agree with this criteria?** *Please select only one item*

Yes

**Please explain why you agree/disagree.**

Dwellings supplied by Housing NZ or Social Housing providers presumably would be 0% for open market highest return and 100% to meeting the needs of the affected population.

**The proposed policy proposes an approach (section A11) to determining which of the existing residential development rules in the Partly Operative District Plan will apply to SHAs. Do you agree with the approach in Section A11?** *Please select only one item*

No

**Please explain why you agree/disagree.**

The existing residential development rules have only recently been through a comprehensive review and consultative process. Therefore surely all the existing rules must apply. They are current and applicable. Whilst I may not agree with the current plan, I accept it as a plan the majority of Hamilton agree is the best compromise of the interests of all sectors of the community.

**Do you have any other comments or feedback about any other aspects of the proposed Housing Accord policy?**

For central government to not like the outcome of the recent district plan process and, in partnership with a newly elected council, to endeavour to ignore this process in order to give the impression of having the right answer to the current housing affordability problem is likely to have a high probability of failure. The local government will take the blame and the Hamilton community will have the negative outcomes for the next 50 to 100 years.

We have recently reviewed district plan. Use it. If it needs tuning then do not rush and allow the time and process to give the best achievable outcome. The quality of a product is remembered long after the time it took to produce. History is littered with the fallout of rushed poorly made decisions.

In any business relationship between a supplier (developer) and customer (affordable housing), it is the supplier's intention to give the least for the highest possible price and the customer's intention to get the most for the lowest possible price. Somewhere in between there is an acceptable and fair deal to be done. The proposed Housing Accord policy is heavily weighted in favour of the supplier (developer) and leaving little benefit to the customer (housing affordability) and is likely to adversely affect the innocent bystanders (population of Hamilton).

Once again, for a newly elected council to propose to ignore the recent comprehensive reviewed district plan (although carried out in the term of the previous council) is ill considered.

## Hearings and Contact Information

**Do you wish to speak in support of your submission at a Council hearing?** *If you don't want to speak at the hearing, but would like staff to know who this submission is from, you are welcome to fill in the Contact Details section.*

No

**Are you responding as:** Individual  
**What is your name?** John Stevenson  
**What is your organisation?** Hamilton resident and ratepayer  
**Where do you live?**

I am a Hamilton City resident, my suburb is: Claudelands  
 or

I live outside the Hamilton boundary, my Council District is:

## Proposed Housing Accord Policy

### Do you agree that Council should have a Housing Accord Policy?

Yes

### Please explain why you think Council should/should not have a Housing Accord Policy?

Tools which allow the RMA process to be shortcut and to stop under or over reactions to supply and demand curves by shortening timeframes need to be part of the toolbox for councils

## Policy Principles

*Section 14 of the proposed policy lists the proposed principles that will be promoted by Council when implementing the Housing Accord Policy.*

### Do you agree with the proposed policy principles?

Yes

### Please tick any of the principles below that you DO NOT agree with. Please select all that apply

B- Council will work with Waikato-Tainui to give effect to the co-management arrangements under the Joint Management Agreement in the context of SHAs and will consider effects on the unique tangata whenua relationships, values, aspirations, roles and responsibilities with respect to areas identified for consideration as an SHA.

F- SHAs must be serviced by and integrated with Council's strategic infrastructure networks.

### Please explain why you don't agree with the principles above, or provide an alternative to the proposed principle. (Please reference A. B. C. etc)

### Do you have any suggested additional principles you think should be added?

## Policy Outcomes & Selection Process

*Section 15 of the proposed policy lists the intended outcomes that Council will seek to achieve by implementing the proposed Housing Accord Policy. Sections 16 to 25 of the proposed policy sets out how Council is proposing to call for and process SHA applications.*

### Do you agree with the proposed policy outcomes?

Yes

### Please tick any of the outcomes below that you DO NOT agree with. Please select all that apply

### Please explain why you don't agree with the outcomes above, or provide an alternative to the proposed outcome. (Please reference A. B.C. etc)

### Do you have any suggested additional outcomes you think should be added?

### Do you agree with the proposed process regarding the selection of SHAs?

Yes

### Please explain why you agree/disagree.

## Evaluation Framework

*The Housing Accord and Special Housing Areas Act 2013 (HASHA Act) prescribes a number of mandatory selection criteria for housing developments within SHAs. Council has the option to set more criteria to guide the selection of SHA in Hamilton.*

*In Schedule 1 of the proposed policy, Council is proposing 4 additional criteria which are:*

21. Location

22. Affordability

23. *Required minimum number of dwellings*  
 24. *Determining which residential development rules will apply to SHA development*

**Schedule 2 of the proposed policy lists areas that ARE NOT suitable for the establishment of SHA's. Please tick any of the areas below that you think should not be included in Schedule 2. Please select all that apply**

- A- All Special Character Zones (excluding Peacock Terrace Area)  
 B- All Recreational Zones  
 F- Special Heritage Areas  
 H- Large Lot Residential Zone

**Please explain why you think the areas indicated above are suitable for SHA.**

**Section A6 of the proposed policy requires that SHA's provide a proportion of affordable dwelling, largely determined by the type and size of the dwellings and sections. Do you agree this criteria will enable the supply of comparatively affordable houses? Please select only one item**

No

**Please explain why you agree/disagree.**

Affordability is a misnomer  
 Interest rates and incomes have a massive impact and HCC has little impact on these

**Section A6 of the proposed policy also encourages collaborative schemes with Housing New Zealand and Registered SHPs and partnerships between the public and the private housing sectors. Do you agree that the policy should specifically encourage collaboration between social housing providers and private developers? Please select only one item**

Yes

**Please explain why you agree/disagree.**

**Section A8 of the proposed policy proposed that SHA will be required to contain a minimum number of 10 dwellings. Do you agree with this criteria? Please select only one item**

No

**Please explain why you agree/disagree.**

Why 10 ?

**The minimum number of dwellings criteria will not apply to Housing New Zealand or registered Social Housing providers. Do you agree with this criteria? Please select only one item**

No

**Please explain why you agree/disagree.**

One rule for all

**The proposed policy proposes an approach (section A11) to determining which of the existing residential development rules in the Partly Operative District Plan will apply to SHAs. Do you agree with the approach in Section A11? Please select only one item**

**Please explain why you agree/disagree.**

**Do you have any other comments or feedback about any other aspects of the proposed Housing Accord policy?**

## Hearings and Contact Information

**Do you wish to speak in support of your submission at a Council hearing?** *If you don't want to speak at the hearing, but would like staff to know who this submission is from, you are welcome to fill in the Contact Details section.*

No

**Are you responding as:** Individual

**What is your name?** Graham Dwyer

**What is your organisation?**

**Where do you live?**

I am a Hamilton City resident, my suburb is: Queenwood

or

I live outside the Hamilton boundary, my Council District is:

## Proposed Housing Accord Policy

### Do you agree that Council should have a Housing Accord Policy?

Yes

### Please explain why you think Council should/should not have a Housing Accord Policy?

WITHOUT POLICIES DEVELOPERS COULD DO WHATEVER THEY WANT

## Policy Principles

*Section 14 of the proposed policy lists the proposed principles that will be promoted by Council when implementing the Housing Accord Policy.*

### Do you agree with the proposed policy principles?

No

### Please tick any of the principles below that you DO NOT agree with. Please select all that apply

- A- Council will openly engage with the community on the identification of the potential areas in the City for consideration as Special Housing Area (SHAs).
- C- Council will work collaboratively with private housing providers ('PHPs'), social housing providers ('SHPs') and the Government to increase housing supply and opportunities for affordable housing.
- E- Council will enable land within SHAs to be used to deliver a range of housing types to the market at different price points in order to achieve the purpose of HASHAA.

### Please explain why you don't agree with the principles above, or provide an alternative to the proposed principle. (Please reference A. B. C. etc)

no more land should be bulldozed to build houses. it's disgusting and is ruining nz & hamilton.

### Do you have any suggested additional principles you think should be added?

the banks need to stop giving loans to poor people with no money.

stop immigration from poor asian, middle eastern & indian countries, then there would be no overpopulation!

## Policy Outcomes & Selection Process

*Section 15 of the proposed policy lists the intended outcomes that Council will seek to achieve by implementing the proposed Housing Accord Policy. Sections 16 to 25 of the proposed policy sets out how Council is proposing to call for and process SHA applications.*

### Do you agree with the proposed policy outcomes?

No

### Please tick any of the outcomes below that you DO NOT agree with. Please select all that apply

- B- In collaboration with the development community, give effect to the Hamilton Housing Accord and its targets for land supply and housing.
- C- The creation of SHAs that achieve the purpose and principles of this Policy.

### Please explain why you don't agree with the outcomes above, or provide an alternative to the proposed outcome. (Please reference A. B.C. etc)

no more land should be built on. consolidate the existing suburbs if you need to fit more people in.

### Do you have any suggested additional outcomes you think should be added?

the banks need to stop giving loans to poor people with no money.

stop immigration from poor asian, middle eastern & indian countries, then there would be no

overpopulation!

**Do you agree with the proposed process regarding the selection of SHAs?**

No

**Please explain why you agree/disagree.**

there shouldnt be any more clearing of land for any reason

## Evaluation Framework

*The Housing Accord and Special Housing Areas Act 2013 (HASHA Act) prescribes a number of mandatory selection criteria for housing developments within SHAs. Council has the option to set more criteria to guide the selection of SHA in Hamilton.*

*In Schedule 1 of the proposed policy, Council is proposing 4 additional criteria which are:*

- 25. Location
- 26. Affordability
- 27. Required minimum number of dwellings
- 28. Determining which residential development rules will apply to SHA development

**Schedule 2 of the proposed policy lists areas that ARE NOT suitable for the establishment of SHA's.**

**Please tick any of the areas below that you think should not be included in Schedule 2.** *Please select all that apply*

**Please explain why you think the areas indicated above are suitable for SHA.**

**Section A6 of the proposed policy requires that SHA's provide a proportion of affordable dwelling, largely determined by the type and size of the dwellings and sections. Do you agree this criteria will enable the supply of comparatively affordable houses?** *Please select only one item*

No

**Please explain why you agree/disagree.**

houses are never cheap , this has been tried before & failed - \$600,000 for a house is not cheap.

**Section A6 of the proposed policy also encourages collaborative schemes with Housing New Zealand and Registered SHPs and partnerships between the public and the private housing sectors. Do you agree that the policy should specifically encourage collaboration between social housing providers and private developers?** *Please select only one item*

No

**Please explain why you agree/disagree.**

developers are greedy and dont care about green space - dont let them have a say

**Section A8 of the proposed policy proposed that SHA will be required to contain a minimum number of 10 dwellings. Do you agree with this criteria?** *Please select only one item*

No

**Please explain why you agree/disagree.**

they should be minimum 5 acre lots if anything

**The minimum number of dwellings criteria will not apply to Housing New Zealand or registered Social Housing providers. Do you agree with this criteria?** *Please select only one item*

No

**Please explain why you agree/disagree.**

one rule for everyone - no separate rules

**The proposed policy proposes an approach (section A11) to determining which of the existing**



**residential development rules in the Partly Operative District Plan will apply to SHAs. Do you agree with the approach in Section A11?** *Please select only one item*

No

**Please explain why you agree/disagree.**

all rules that support not building on existing farmland should be kept.

**Do you have any other comments or feedback about any other aspects of the proposed Housing Accord policy?**

you need to try to stop development of more land.

## Hearings and Contact Information

**Do you wish to speak in support of your submission at a Council hearing?** *If you don't want to speak at the hearing, but would like staff to know who this submission is from, you are welcome to fill in the Contact Details section.*

No

**Are you responding as:** Individual

**What is your name?** amanda

**What is your organisation?** n/a

**Where do you live?**

I am a Hamilton City resident, my suburb is: Te Kowhai

or

I live outside the Hamilton boundary, my Council District is: Waikato

## Proposed Housing Accord Policy

### Do you agree that Council should have a Housing Accord Policy?

Yes

### Please explain why you think Council should/should not have a Housing Accord Policy?

Councils are key stakeholders in housing solutions, and are representative bodies of the citizens, therefore policy needs to be developed for orderly administration of council's participation in the enablement of housing.

## Policy Principles

*Section 14 of the proposed policy lists the proposed principles that will be promoted by Council when implementing the Housing Accord Policy.*

### Do you agree with the proposed policy principles?

Yes

**Please tick any of the principles below that you DO NOT agree with.** *Please select all that apply*

**Please explain why you don't agree with the principles above, or provide an alternative to the proposed principle.** *(Please reference A. B. C. etc)*

### Do you have any suggested additional principles you think should be added?

There is too much alignment with objectives, standards and preconceived perceptions contained in the current policy documents referenced. The SHAs should adopt more radical standards - including the option to experiment in safety - and should recognise that standards applicable to development under existing policy documents exceed what is necessary or affordable for SHAs. The overall objective of SHAs is to relieve the dire need for affordable housing. Its purpose is to provide houses, not investments.

## Policy Outcomes & Selection Process

*Section 15 of the proposed policy lists the intended outcomes that Council will seek to achieve by implementing the proposed Housing Accord Policy. Sections 16 to 25 of the proposed policy sets out how Council is proposing to call for and process SHA applications.*

### Do you agree with the proposed policy outcomes?

Yes

**Please tick any of the outcomes below that you DO NOT agree with.** *Please select all that apply*

**Please explain why you don't agree with the outcomes above, or provide an alternative to the proposed outcome.** *(Please reference A. B.C. etc)*

### Do you have any suggested additional outcomes you think should be added?

Please see previous related comments under 6).

### Do you agree with the proposed process regarding the selection of SHAs?

Yes

**Please explain why you agree/disagree.**

## Evaluation Framework

*The Housing Accord and Special Housing Areas Act 2013 (HASHA Act) prescribes a number of mandatory selection criteria for housing developments within SHAs. Council has the option to set more criteria to guide the selection of SHA in Hamilton.*

*In Schedule 1 of the proposed policy, Council is proposing 4 additional criteria which are:*

29. Location
30. Affordability
31. Required minimum number of dwellings
32. Determining which residential development rules will apply to SHA development

**Schedule 2 of the proposed policy lists areas that ARE NOT suitable for the establishment of SHA's. Please tick any of the areas below that you think should not be included in Schedule 2. Please select all that apply**

**Please explain why you think the areas indicated above are suitable for SHA.**

**Section A6 of the proposed policy requires that SHA's provide a proportion of affordable dwelling, largely determined by the type and size of the dwellings and sections. Do you agree this criteria will enable the supply of comparatively affordable houses? Please select only one item**

No

**Please explain why you agree/disagree.**

A maximum house size of 150m<sup>2</sup> GFA is excessive for two bedrooms. It is entirely feasible to construct a fully-featured two-bedroom dwelling at less than 100m<sup>2</sup>. Further, the option should be available - especially if targeting first-time homeowners - to construct a dwelling that can be extended when the owners can afford this, or when their needs change. The starter home could be as small as 60m<sup>2</sup>. Developers universally avoid this model as their profit potential on a small house is less, and the investors for whom they build, do not recognise this as a desirable acquisition. Rules and covenants that protect investors and developers at the expense of genuine prospective homeowners have no place in special housing initiatives.

**Section A6 of the proposed policy also encourages collaborative schemes with Housing New Zealand and Registered SHPs and partnerships between the public and the private housing sectors. Do you agree that the policy should specifically encourage collaboration between social housing providers and private developers? Please select only one item**

Yes

**Please explain why you agree/disagree.**

Agree subject to considerations in 14) above.

**Section A8 of the proposed policy proposed that SHA will be required to contain a minimum number of 10 dwellings. Do you agree with this criteria? Please select only one item**

Yes

**Please explain why you agree/disagree.**

The investment in time and effort in establishing a SHA, as well as the environmental impact of differentiation or integration, needs to have a scale that will make it meaningful.

**The minimum number of dwellings criteria will not apply to Housing New Zealand or registered Social Housing providers. Do you agree with this criteria? Please select only one item**

No

**Please explain why you agree/disagree.**

Social housing providers sometimes have preferential negotiating factors that could enable effective participation under this policy in individual and unique locations. However it can be reasoned that the objective of affordable housing can be met independently of this policy, and by means of individual houses, if the right conditions can be identified (such as land cost and/ or construction costs, amenable covenants, amenable council development standards).

**The proposed policy proposes an approach (section A11) to determining which of the existing residential development rules in the Partly Operative District Plan will apply to SHAs. Do you agree with the approach in Section A11?** *Please select only one item*

No

**Please explain why you agree/disagree.**

SHAs should be liberated from literal reference to existing policy documents such as the PODP as they are predicated on standards and outcomes that are at odds with the objective of affordability and, in fact, housing (as opposed to investing). A SHA proposal should be evaluated on its own merits, the primary one being the provision of truly affordable (not relatively less unaffordable) housing.

**Do you have any other comments or feedback about any other aspects of the proposed Housing Accord policy?**

### Hearings and Contact Information

**Do you wish to speak in support of your submission at a Council hearing?** *If you don't want to speak at the hearing, but would like staff to know who this submission is from, you are welcome to fill in the Contact Details section.*

No

**Are you responding as:** Other Architect (employee), as an individual

**What is your name?** Len Halgryn

**What is your organisation?** HBC Designs Ltd

**Where do you live?**

I am a Hamilton City resident, my suburb is: Queenwood

or

I live outside the Hamilton boundary, my Council District is:

## Proposed Housing Accord Policy

### Do you agree that Council should have a Housing Accord Policy?

Yes

### Please explain why you think Council should/should not have a Housing Accord Policy?

The council needs to get in behind the SHA to speed up the release of land for residential development. The policy needs to be kept brief so as not to introduce hurdles slowing development down. The policy will still need to address important issues like infrastructure needing to be funded by the developer and urban planning needs to be of high quality.

## Policy Principles

*Section 14 of the proposed policy lists the proposed principles that will be promoted by Council when implementing the Housing Accord Policy.*

### Do you agree with the proposed policy principles?

Not Answered

### Please tick any of the principles below that you DO NOT agree with. Please select all that apply

- A- Council will openly engage with the community on the identification of the potential areas in the City for consideration as Special Housing Area (SHAs).
- C- Council will work collaboratively with private housing providers ('PHPs'), social housing providers ('SHPs') and the Government to increase housing supply and opportunities for affordable housing.
- D- Council will enable SHAs that achieve the purpose of HASHAA provided they do not compromise or undermine Council's existing or planned infrastructure, and is generally consistent with Council's strategic land use planning.
- E- Council will enable land within SHAs to be used to deliver a range of housing types to the market at different price points in order to achieve the purpose of HASHAA.
- H- Development within SHAs will be consistent with the evaluation criteria and objectives set out in the schedules to this Policy. Priority will be given to establishing SHAs that are consistent with the strategic direction set within the Partly Operative District Plan ('PODP').

### Please explain why you don't agree with the principles above, or provide an alternative to the proposed principle. (Please reference A. B. C. etc)

District plan is out of date already. No reference should be made to this document in the SHA. Housing product will be designed to meet the market so can't see a need to be prescriptive to require a variety of housing. This is about housing affordability not social housing which needs to be addressed using other initiatives. We have to increase the supply of residential land principally to meet demand and provide competition for land developers. We have to get on with this and we can't be slowed down by town planners setting rigid criteria.

### Do you have any suggested additional principles you think should be added?

## Policy Outcomes & Selection Process

*Section 15 of the proposed policy lists the intended outcomes that Council will seek to achieve by implementing the proposed Housing Accord Policy. Sections 16 to 25 of the proposed policy sets out how Council is proposing to call for and process SHA applications.*

### Do you agree with the proposed policy outcomes?

Not Answered

### Please tick any of the outcomes below that you DO NOT agree with. Please select all that apply

- D- Ensure SHAs are generally consistent with and have regard to the relevant provisions of the PODP.

**Please explain why you don't agree with the outcomes above, or provide an alternative to the proposed outcome.** *(Please reference A. B.C. etc)*

Forget about the District Plan. This is partially what caused the problem in the first place.

**Do you have any suggested additional outcomes you think should be added?**

We need more amenity in our city. An outcome could be that more amenity is added rather than just intensified residential development.

**Do you agree with the proposed process regarding the selection of SHAs?**

Yes

**Please explain why you agree/disagree.**

## Evaluation Framework

*The Housing Accord and Special Housing Areas Act 2013 (HASHA Act) prescribes a number of mandatory selection criteria for housing developments within SHAs. Council has the option to set more criteria to guide the selection of SHA in Hamilton.*

*In Schedule 1 of the proposed policy, Council is proposing 4 additional criteria which are:*

33. *Location*

34. *Affordability*

35. *Required minimum number of dwellings*

36. *Determining which residential development rules will apply to SHA development*

**Schedule 2 of the proposed policy lists areas that ARE NOT suitable for the establishment of SHA's.**

**Please tick any of the areas below that you think should not be included in Schedule 2.** *Please select all that apply*

**Please explain why you think the areas indicated above are suitable for SHA.**

**Section A6 of the proposed policy requires that SHA's provide a proportion of affordable dwelling, largely determined by the type and size of the dwellings and sections. Do you agree this criteria will enable the supply of comparatively affordable houses?** *Please select only one item*

Yes

**Please explain why you agree/disagree.**

Section sizes determine the price so clearly smaller lots are more affordable. However we need to have a mixture where possible and amenity to get the balance and urban planning right.

**Section A6 of the proposed policy also encourages collaborative schemes with Housing New Zealand and Registered SHPs and partnerships between the public and the private housing sectors. Do you agree that the policy should specifically encourage collaboration between social housing providers and private developers?** *Please select only one item*

No

**Please explain why you agree/disagree.**

This is not about social housing this is about affordable housing

**Section A8 of the proposed policy proposed that SHA will be required to contain a minimum number of 10 dwellings. Do you agree with this criteria?** *Please select only one item*

Yes

**Please explain why you agree/disagree.**

**The minimum number of dwellings criteria will not apply to Housing New Zealand or registered Social Housing providers. Do you agree with this criteria?** *Please select only one item*

Yes

**Please explain why you agree/disagree.**

**The proposed policy proposes an approach (section A11) to determining which of the existing residential development rules in the Partly Operative District Plan will apply to SHAs. Do you agree with the approach in Section A11?** *Please select only one item*

Yes

**Please explain why you agree/disagree.**

**Do you have any other comments or feedback about any other aspects of the proposed Housing Accord policy?**

## Hearings and Contact Information

**Do you wish to speak in support of your submission at a Council hearing?** *If you don't want to speak at the hearing, but would like staff to know who this submission is from, you are welcome to fill in the Contact Details section.*

No

**Are you responding as:** Individual

**What is your name?**

**What is your organisation?**

**Where do you live?**

I am a Hamilton City resident, my suburb is: Rototuna

or

I live outside the Hamilton boundary, my Council District is:

## Proposed Housing Accord Policy

### Do you agree that Council should have a Housing Accord Policy?

Yes

### Please explain why you think Council should/should not have a Housing Accord Policy?

It establishes clear guidelines on housing development.

### Policy Principles

*Section 14 of the proposed policy lists the proposed principles that will be promoted by Council when implementing the Housing Accord Policy.*

### Do you agree with the proposed policy principles?

Yes

### Please tick any of the principles below that you DO NOT agree with. Please select all that apply

B- Council will work with Waikato-Tainui to give effect to the co-management arrangements under the Joint Management Agreement in the context of SHAs and will consider effects on the unique tangata whenua relationships, values, aspirations, roles and responsibilities with respect to areas identified for consideration as an SHA.

### Please explain why you don't agree with the principles above, or provide an alternative to the proposed principle. (Please reference A. B. C. etc)

There is not much explanation on co-management arrangements, how this would work and the added value of this arrangements in terms of providing affordable housing to low-income families.

### Do you have any suggested additional principles you think should be added?

Yes. I'd like include a statement

"The Council will work with community groups to develop cohousing neighbourhood its principles and practices.

There shall be SHA dedicated (allotted) to cohousing neighbourhood.

### Policy Outcomes & Selection Process

*Section 15 of the proposed policy lists the intended outcomes that Council will seek to achieve by implementing the proposed Housing Accord Policy.*

*Sections 16 to 25 of the proposed policy sets out how Council is proposing to call for and process SHA applications.*

### Do you agree with the proposed policy outcomes?

Yes

### Please tick any of the outcomes below that you DO NOT agree with. Please select all that apply

### Please explain why you don't agree with the outcomes above, or provide an alternative to the proposed outcome. (Please reference A. B.C. etc)

### Do you have any suggested additional outcomes you think should be added?

Ensure sustainable cohousing neighbourhood

### Do you agree with the proposed process regarding the selection of SHAs?

No

### Please explain why you agree/disagree.



The process should include community groups not only the developers.

A community group could be a group of at least 10 families who are interested to embark on cohousing neighbourhood

## Evaluation Framework

*The Housing Accord and Special Housing Areas Act 2013 (HASHA Act) prescribes a number of mandatory selection criteria for housing developments within SHAs. Council has the option to set more criteria to guide the selection of SHA in Hamilton.*

*In Schedule 1 of the proposed policy, Council is proposing 4 additional criteria which are:*

37. Location

38. Affordability

39. Required minimum number of dwellings

40. Determining which residential development rules will apply to SHA development

**Schedule 2 of the proposed policy lists areas that ARE NOT suitable for the establishment of SHA's. Please tick any of the areas below that you think should not be included in Schedule 2.** *Please select all that apply*

**Please explain why you think the areas indicated above are suitable for SHA.**

**Section A6 of the proposed policy requires that SHA's provide a proportion of affordable dwelling, largely determined by the type and size of the dwellings and sections. Do you agree this criteria will enable the supply of comparatively affordable houses?** *Please select only one item*

Yes

**Please explain why you agree/disagree.**

It suits low income to average earning families.

**Section A6 of the proposed policy also encourages collaborative schemes with Housing New Zealand and Registered SHPs and partnerships between the public and the private housing sectors. Do you agree that the policy should specifically encourage collaboration between social housing providers and private developers?** *Please select only one item*

No

**Please explain why you agree/disagree.**

Priority should be given to social housing providers. Private housing providers are usually investors and SHPs may find it difficult to compete with private housing providers.

**Section A8 of the proposed policy proposed that SHA will be required to contain a minimum number of 10 dwellings. Do you agree with this criteria?** *Please select only one item*

Yes

**Please explain why you agree/disagree.**

It should rather indicate a maximum no of dwellings to avoid overcrowding and depletion of resources in the area.

**The minimum number of dwellings criteria will not apply to Housing New Zealand or registered Social Housing providers. Do you agree with this criteria?** *Please select only one item*

No

**Please explain why you agree/disagree.**

As explain above

**The proposed policy proposes an approach (section A11) to determining which of the existing residential development rules in the Partly Operative District Plan will apply to SHAs. Do you agree with the approach in Section A11?** *Please select only one item*

**Please explain why you agree/disagree.**

To include cohousing neighbourhood development

**Do you have any other comments or feedback about any other aspects of the proposed Housing Accord policy?**

It is high time that the Council promotes cohousing neighbourhood and include the scheme in its housing policy.

## Hearings and Contact Information

**Do you wish to speak in support of your submission at a Council hearing?** *If you don't want to speak at the hearing, but would like staff to know who this submission is from, you are welcome to fill in the Contact Details section.*

No

**Are you responding as:** Individual

**What is your name?** Delilah Fuertes

**What is your organisation?**

**Where do you live?**

I am a Hamilton City resident, my suburb is: Melville

or

I live outside the Hamilton boundary, my Council District is:

## Proposed Housing Accord Policy

### Do you agree that Council should have a Housing Accord Policy?

Yes

### Please explain why you think Council should/should not have a Housing Accord Policy?

There is a need for a variety of tools to deliver sufficient supply of economically, socially, and environmentally sustainable housing, and this accord can add to that process

## Policy Principles

*Section 14 of the proposed policy lists the proposed principles that will be promoted by Council when implementing the Housing Accord Policy.*

### Do you agree with the proposed policy principles?

Yes

**Please tick any of the principles below that you DO NOT agree with.** *Please select all that apply*

### **Please explain why you don't agree with the principles above, or provide an alternative to the proposed principle.** *(Please reference A. B. C. etc)*

Generally agree, but this submission is aimed at encouraging the Council to also implement provision for co-housing initiatives driven by community-based groups to create the opportunity for housing which is truly sustainable and regenerative in social terms as well as economic (affordable) and environmental.

### **Do you have any suggested additional principles you think should be added?**

See comment in (5) above. Council should support community initiatives to develop co-housing schemes by making good quality, suitable land available to be owned by a Community Land Trust structure at an affordable cost, or preferably at no cost, as the land will continue to be held by the trust, and not sold on to the homeowners who will lease their portion of the land.

## Policy Outcomes & Selection Process

*Section 15 of the proposed policy lists the intended outcomes that Council will seek to achieve by implementing the proposed Housing Accord Policy. Sections 16 to 25 of the proposed policy sets out how Council is proposing to call for and process SHA applications.*

### Do you agree with the proposed policy outcomes?

Yes

**Please tick any of the outcomes below that you DO NOT agree with.** *Please select all that apply*

### **Please explain why you don't agree with the outcomes above, or provide an alternative to the proposed outcome.** *(Please reference A. B.C. etc)*

Agree Provided that the scope of policy is extended to include the outcome listed in (10) below

### **Do you have any suggested additional outcomes you think should be added?**

Additional outcome: to facilitate the creation of Community Land Trust landholdings, and co-housing initiatives on that land to provide truly sustainable and regenerative housing which is affordable and creates home-owning opportunities for a diverse range of inhabitants.

### Do you agree with the proposed process regarding the selection of SHAs?

Yes

**Please explain why you agree/disagree.**

Generally agree provided that suitable land is available for co-housing initiatives as described above

**Evaluation Framework**

*The Housing Accord and Special Housing Areas Act 2013 (HASHA Act) prescribes a number of mandatory selection criteria for housing developments within SHAs. Council has the option to set more criteria to guide the selection of SHA in Hamilton.*

*In Schedule 1 of the proposed policy, Council is proposing 4 additional criteria which are:*

41. Location
42. Affordability
43. Required minimum number of dwellings
44. Determining which residential development rules will apply to SHA development

**Schedule 2 of the proposed policy lists areas that ARE NOT suitable for the establishment of SHA's.**

**Please tick any of the areas below that you think should not be included in Schedule 2.** *Please select all that apply*

**Please explain why you think the areas indicated above are suitable for SHA.**

**Section A6 of the proposed policy requires that SHA's provide a proportion of affordable dwelling, largely determined by the type and size of the dwellings and sections. Do you agree this criteria will enable the supply of comparatively affordable houses?** *Please select only one item*

No

**Please explain why you agree/disagree.**

Proposed policy will assist in delivering this outcome. However, housing outcomes which are truly sustainable and regenerative will not be achieved without the additional provision of land and assistance to facilitate co-housing initiatives. This would include the provision of low-cost or no-cost land (to be allocated on a leasehold basis through a CLT); and the application of Council regulations and requirements to facilitate the development of co-housing initiatives

**Section A6 of the proposed policy also encourages collaborative schemes with Housing New Zealand and Registered SHPs and partnerships between the public and the private housing sectors. Do you agree that the policy should specifically encourage collaboration between social housing providers and private developers?** *Please select only one item*

Yes

**Please explain why you agree/disagree.**

Provided that as above, other approaches such as co-housing are also facilitated

**Section A8 of the proposed policy proposed that SHA will be required to contain a minimum number of 10 dwellings. Do you agree with this criteria?** *Please select only one item*

Yes

**Please explain why you agree/disagree.**

**The minimum number of dwellings criteria will not apply to Housing New Zealand or registered Social Housing providers. Do you agree with this criteria?** *Please select only one item*

Yes

**Please explain why you agree/disagree.**

**The proposed policy proposes an approach (section A11) to determining which of the existing residential development rules in the Partly Operative District Plan will apply to SHAs. Do you agree with the approach in Section A11?** *Please select only one item*

**Please explain why you agree/disagree.**

Provided that Council's approach to the development of co-housing initiatives is also enabling.

**Do you have any other comments or feedback about any other aspects of the proposed Housing Accord policy?**

### Hearings and Contact Information

**Do you wish to speak in support of your submission at a Council hearing?** *If you don't want to speak at the hearing, but would like staff to know who this submission is from, you are welcome to fill in the Contact Details section.*

Yes

**Are you responding as:** Individual

**What is your name?** David Robinson

**What is your organisation?**

**Where do you live?**

I am a Hamilton City resident, my suburb is: Hamilton East

or

I live outside the Hamilton boundary, my Council District is:

## Proposed Housing Accord Policy

### Do you agree that Council should have a Housing Accord Policy?

Yes

### Please explain why you think Council should/should not have a Housing Accord Policy?

Yes, and should also in this be accommodating Co Housing Initiatives within this accord. If affordability is truly a goal of this council, having land assigned/zoned for co housing like in Denmark, Sweden, USA, UK and Canada, as well as many in Australia, and only ONE so far in NZ, is a must. see [www.cohousing.org](http://www.cohousing.org) to discover the basic's of cohousing

## Policy Principles

*Section 14 of the proposed policy lists the proposed principles that will be promoted by Council when implementing the Housing Accord Policy.*

### Do you agree with the proposed policy principles?

Yes

### Please tick any of the principles below that you DO NOT agree with. Please select all that apply

J- Development of SHAs will achieve high quality urban design outcomes.

### Please explain why you don't agree with the principles above, or provide an alternative to the proposed principle. (Please reference A. B. C. etc)

J. Environmental, sustainable and affordable housing with allowance for Co Housing developments. The design of Co housing is a proactive way of fostering social relationships among its residence, rather than what a developer thinks will help sell units. Typically the group of 20 or so houses are clustered around a shared space, typically featuring a common house which may include a large kitchen and dining area, laundry and recreational area. Shared outdoor spaces, gardens and shared playgrounds for children. Neighbours can share tools and lawnmowers.

### Do you have any suggested additional principles you think should be added?

As above.. land set aside for Co housing, in fact could be more than one land area across the urban area of Hamilton. Individual Land titles for houses, OR Community Land Trusts are a REAL way of increasing housing affordability.

## Policy Outcomes & Selection Process

*Section 15 of the proposed policy lists the intended outcomes that Council will seek to achieve by implementing the proposed Housing Accord Policy. Sections 16 to 25 of the proposed policy sets out how Council is proposing to call for and process SHA applications.*

### Do you agree with the proposed policy outcomes?

Yes

### Please tick any of the outcomes below that you DO NOT agree with. Please select all that apply

B- In collaboration with the development community, give effect to the Hamilton Housing Accord and its targets for land supply and housing.

### Please explain why you don't agree with the outcomes above, or provide an alternative to the proposed outcome. (Please reference A. B.C. etc)

As long as equal consideration is given to setting aside some land for Co Housing initiatives.

### Do you have any suggested additional outcomes you think should be added?

Zoning for Co Housing Initiatives.

**Do you agree with the proposed process regarding the selection of SHAs?**

Yes

**Please explain why you agree/disagree.**

Please include allocation of urban land for Co Housing initiatives in Hamilton. Facility for Community Land Trusts is also important to increase affordability.

**Evaluation Framework**

*The Housing Accord and Special Housing Areas Act 2013 (HASHA Act) prescribes a number of mandatory selection criteria for housing developments within SHAs. Council has the option to set more criteria to guide the selection of SHA in Hamilton.*

*In Schedule 1 of the proposed policy, Council is proposing 4 additional criteria which are:*

45. Location
46. Affordability
47. Required minimum number of dwellings
48. Determining which residential development rules will apply to SHA development

**Schedule 2 of the proposed policy lists areas that ARE NOT suitable for the establishment of SHA's.**

**Please tick any of the areas below that you think should not be included in Schedule 2.** *Please select all that apply*

H- Large Lot Residential Zone

**Please explain why you think the areas indicated above are suitable for SHA.**

Some areas set aside for Co Housing initiatives would complement the residential zones as they would be sustainable green environmentally friendly areas. Please look at [www.earthsong.co.nz](http://www.earthsong.co.nz) the Ranui co housing development that has been going 10 years.

**Section A6 of the proposed policy requires that SHA's provide a proportion of affordable dwelling, largely determined by the type and size of the dwellings and sections. Do you agree this criteria will enable the supply of comparatively affordable houses?** *Please select only one item*

Yes

**Please explain why you agree/disagree.**

Only if it additionally includes some community land trusts with the land held in trust and co housing on these lands.

**Section A6 of the proposed policy also encourages collaborative schemes with Housing New Zealand and Registered SHPs and partnerships between the public and the private housing sectors. Do you agree that the policy should specifically encourage collaboration between social housing providers and private developers?** *Please select only one item*

Yes

**Please explain why you agree/disagree.**

please see the comments on Co housing throughout this survey

**Section A8 of the proposed policy proposed that SHA will be required to contain a minimum number of 10 dwellings. Do you agree with this criteria?** *Please select only one item*

Yes

**Please explain why you agree/disagree.**

Co housing initiatives that are resident led can accommodate up to 30 houses around a shared common land with shared gardens etc. Much more efficient use of land and socially better for the residents.

**The minimum number of dwellings criteria will not apply to Housing New Zealand or registered Social Housing providers. Do you agree with this criteria?** *Please select only one item*

Yes

**Please explain why you agree/disagree.**

Some areas set aside for Co Housing initiatives would complement the residential zones as they would be sustainable green environmentally friendly areas. Please look at [www.earthsong.co.nz](http://www.earthsong.co.nz) the Ranui co housing development that has been going 10 years.

**The proposed policy proposes an approach (section A11) to determining which of the existing residential development rules in the Partly Operative District Plan will apply to SHAs. Do you agree with the approach in Section A11?** *Please select only one item*

**Please explain why you agree/disagree.****Do you have any other comments or feedback about any other aspects of the proposed Housing Accord policy?**

Some areas set aside for Co Housing initiatives would complement the residential zones as they would be sustainable green environmentally friendly areas. Please look at [www.earthsong.co.nz](http://www.earthsong.co.nz) the Ranui co housing development that has been going 10 years.

**Hearings and Contact Information**

**Do you wish to speak in support of your submission at a Council hearing?** *If you don't want to speak at the hearing, but would like staff to know who this submission is from, you are welcome to fill in the Contact Details section.*

Yes

**Are you responding as:** Individual  
**What is your name?** Sue Lawrence  
**What is your organisation?** NA  
**Where do you live?**

I am a Hamilton City resident, my suburb is: Hamilton East

or

I live outside the Hamilton boundary, my Council District is:



## Proposed Housing Accord Policy

**Do you agree that Council should have a Housing Accord Policy?**

Yes

**Please explain why you think Council should/should not have a Housing Accord Policy?**

### Policy Principles

*Section 14 of the proposed policy lists the proposed principles that will be promoted by Council when implementing the Housing Accord Policy.*

**Do you agree with the proposed policy principles?**

Yes

**Please tick any of the principles below that you DO NOT agree with.** *Please select all that apply*

**Please explain why you don't agree with the principles above, or provide an alternative to the proposed principle.** *(Please reference A. B. C. etc)*

**Do you have any suggested additional principles you think should be added?**

Some design criteria/housing outcomes for the housing policy would be to consider residents who would like to:

- co-design their house and neighbourhood to reflect their cultural and social needs
- live in a neighbourhood where residents have a strong sense of inclusion, belonging, and community spirit for sharing and helping one another
- live in a neighbourhood where shared facilities are available and utilised not only by the direct residents but by the community at large
- be affordable to still have money left over to enjoy life
- have a system by which residents can have a say in decisions that affect their neighbourhood
- have space to accommodate extended family—like grandparents or grandchildren
- be able to share resources that residents don't use very often like large tools and equipment
- live in a warmer house that takes advantage of the sun to warm it during the day
- have space near the homes to grow food or have a shared food garden
- live in a way that is environmentally sustainable and doesn't contribute to climate change
- have opportunities to work close by

These principles could be described as co-housing and are similar to the Earthsong Eco-village in Ranui, West Auckland

### Policy Outcomes & Selection Process

*Section 15 of the proposed policy lists the intended outcomes that Council will seek to achieve by implementing the proposed Housing Accord Policy. Sections 16 to 25 of the proposed policy sets out how Council is proposing to call for and process SHA applications.*

**Do you agree with the proposed policy outcomes?**

Yes

**Please tick any of the outcomes below that you DO NOT agree with.** *Please select all that apply*

**Please explain why you don't agree with the outcomes above, or provide an alternative to the proposed outcome.** *(Please reference A. B.C. etc)*

**Do you have any suggested additional outcomes you think should be added?**

Affordability of the housing in the SHA's should be at the forefront, however it is not enough to make the

houses "affordable" for the first occupant but also subsequent ones. The idea of permanent affordability.

Thought should be given to the assigning specific areas of the SHA's the status of a Community Land Trust or similar. This is a principle that has been used in numerous cities in the US and UK with great success.

**Do you agree with the proposed process regarding the selection of SHAs?**

Yes

**Please explain why you agree/disagree.**

## Evaluation Framework

*The Housing Accord and Special Housing Areas Act 2013 (HASHA Act) prescribes a number of mandatory selection criteria for housing developments within SHAs. Council has the option to set more criteria to guide the selection of SHA in Hamilton.*

*In Schedule 1 of the proposed policy, Council is proposing 4 additional criteria which are:*

*49. Location*

*50. Affordability*

*51. Required minimum number of dwellings*

*52. Determining which residential development rules will apply to SHA development*

**Schedule 2 of the proposed policy lists areas that ARE NOT suitable for the establishment of SHA's.**

**Please tick any of the areas below that you think should not be included in Schedule 2.** *Please select all that apply*

**Please explain why you think the areas indicated above are suitable for SHA.**

**Section A6 of the proposed policy requires that SHA's provide a proportion of affordable dwelling, largely determined by the type and size of the dwellings and sections. Do you agree this criteria will enable the supply of comparatively affordable houses?** *Please select only one item*

No

**Please explain why you agree/disagree.**

As previously stated the idea of permanently affordable should be at the heart of the development. The use of Community Land trusts or CLTs are one mechanism whereby permanent affordability is arrived at

**Section A6 of the proposed policy also encourages collaborative schemes with Housing New Zealand and Registered SHPs and partnerships between the public and the private housing sectors. Do you agree that the policy should specifically encourage collaboration between social housing providers and private developers?** *Please select only one item*

Yes

**Please explain why you agree/disagree.**

**Section A8 of the proposed policy proposed that SHA will be required to contain a minimum number of 10 dwellings. Do you agree with this criteria?** *Please select only one item*

Yes

**Please explain why you agree/disagree.**

**The minimum number of dwellings criteria will not apply to Housing New Zealand or registered Social Housing providers. Do you agree with this criteria?** *Please select only one item*

Yes

**Please explain why you agree/disagree.**

**The proposed policy proposes an approach (section A11) to determining which of the existing residential development rules in the Partly Operative District Plan will apply to SHAs. Do you agree with the approach in Section A11?** *Please select only one item*

Yes

**Please explain why you agree/disagree.**

**Do you have any other comments or feedback about any other aspects of the proposed Housing Accord policy?**

## Hearings and Contact Information

**Do you wish to speak in support of your submission at a Council hearing?** *If you don't want to speak at the hearing, but would like staff to know who this submission is from, you are welcome to fill in the Contact Details section.*

Yes

**Are you responding as:** Individual

**What is your name?** Brad White

**What is your organisation?**

**Where do you live?**

I am a Hamilton City resident, my suburb is:

or

I live outside the Hamilton boundary, my Council District is: Waipa

## Proposed Housing Accord Policy

### Do you agree that Council should have a Housing Accord Policy?

Yes

### Please explain why you think Council should/should not have a Housing Accord Policy?

It is important that we have principles and criteria and outcomes clearly defined that guide the development of any new housing in Hamilton, therefore we should have a housing accord policy. But, it does need a lot of additions and changes, as I will state in my submission.

### Policy Principles

*Section 14 of the proposed policy lists the proposed principles that will be promoted by Council when implementing the Housing Accord Policy.*

### Do you agree with the proposed policy principles?

No

### Please tick any of the principles below that you DO NOT agree with. Please select all that apply

- C- Council will work collaboratively with private housing providers ('PHPs'), social housing providers ('SHPs') and the Government to increase housing supply and opportunities for affordable housing.
- D- Council will enable SHAs that achieve the purpose of HASHAA provided they do not compromise or undermine Council's existing or planned infrastructure, and is generally consistent with Council's strategic land use planning.
- F- SHAs must be serviced by and integrated with Council's strategic infrastructure networks.
- H- Development within SHAs will be consistent with the evaluation criteria and objectives set out in the schedules to this Policy. Priority will be given to establishing SHAs that are consistent with the strategic direction set within the Partly Operative District Plan ('PODP').
- I- Development within SHAs will occur as quickly as practicable.
- J- Development of SHAs will achieve high quality urban design outcomes.

### Please explain why you don't agree with the principles above, or provide an alternative to the proposed principle. (Please reference A. B. C. etc)

- C. Council should also be willing to work with citizen groups who want to co-design their own neighbourhoods. These citizen groups could form themselves into trusts or other entities to be able to proceed with being citizen developers. Council should also convert some of the land into Community Land Trusts to offer true affordability.
- D. We need to look at how ecologically built neighbourhoods can supply some of their own infrastructure such as rainwater catchment, biogas digesters, compost toilets, and that strategic land use can include community gardens and even light economic activity such as cottage industries. Land zoned for agriculture can be formed into ecological land cooperatives to allow for many homesteads on a piece of agricultural land.
- F. We need to look at where roads are in a community. Houses should have land and foot paths going through the centre of the community--not roads and cars should be kept to the periphery. Again, alternative energy models can ease the need for Council's infrastructure.
- H. The criteria and outcomes laid out in this policy are way too narrow. See below for where I expand the list of outcomes and criteria to include social, ecological and economic factors.
- I. We are building things that will occupy space and land for centuries to come and how those structures are built and situated influences whether a community is cohesive or divisive. Permaculture and nature work on slow and steady. Community consultations cannot be rushed. We need houses but we don't want to end up with structures and neighbourhoods can cause more damage than good. We need to balance more housing with good design and wide community consultation.
- J. I believe the urban design outcomes also needs to be expanded to include natural building materials, alternative energy, community gardens, north-facing, and other factors. We need to expand these urban design outcomes to be more holistic.

**Do you have any suggested additional principles you think should be added?**

Housing & neighbourhood development needs to be considered as to how they can be the solution to human & societal problems, environmental degradation, and economic disparity—not just an outcome of more structures for people to live in. The criteria and housing outcomes for choosing housing developers and Special Housing Areas needs to be expanded to include social-cultural, ecological, and economic criteria & outcomes—not just how many houses per area of land or how big each dwelling. Hamilton could harness this Housing Accord grant to become a model city of New Zealand for environmentally sustainable and socially responsible housing, neighbourhoods and community development.

**Social/Cultural Outcomes**

Most people wanting a home want not only a building in which to live but they want a neighbourhood, to feel a sense of belonging and connection, to feel they have a voice in what goes on in their neighbourhood, and to have opportunities to interact with the natural world around them. How we develop houses can either contribute to these human needs or detract from them. For instance, how houses are situated/oriented in relation to each other can offer privacy and autonomy while also giving a sense of belonging and inclusion.

If houses are built like commodities without a holistic approach, people can be left feeling isolated, disconnected, disempowered, and dysfunctional—and all of society and our taxes bear the costs of those negative social outcomes. If houses are designed correctly, communities can become more empowered and resilient to solve their own problems and meet their own needs.

**Environmental Outcomes**

We can significantly reduce the negative effects of climate change, environmental pollution, and loss of biodiversity through designing in what materials we build the houses with and how nature can be incorporated into the design. For instance, we need to consider how the houses can be built with low-embodied energy materials and how they are designed for maximum energy efficiency and passive solar heating. Residents can be more self-sufficient with energy, water, and food. For instance, house designs can include rainwater catchment systems, solar water heaters, and green spaces to absorb water, as food gardens, and as a habitat for biodiversity.

**Economic Outcomes**

Neighbourhoods can be built in a way that enhances the economic opportunities for inhabitants such as where residents can have cottage industries to sell value-added products and services. Many intentional communities have training programmes as social enterprises or small businesses, teaching skills in sustainable living, alternative energy, maintenance, food growing and permaculture design, upcycling skills, etc. Residents can also save money if there are shared community resources and each household doesn't need to have one of every tool. The greatest savings is if the price of land is removed from the housing price—where the land is held by a non-profit Community Land Trust.

Special Areas Housing Criteria & outcomes should include:

- Sustainable Development Goals
- Permaculture Principles
- Outcomes laid out by the community members themselves
- Economic stability and opportunities for economic activity

Housing service providers needs to be expanded to include citizen groups who want to work with developers to co-design their own neighbourhoods.

Only two housing provider entities are mentioned in the policy statement: Private Housing Providers (PHP) and Social Housing Providers (SHP). The most sustainable developments are those where the

residents who will be living in those houses or the local community are included in the design planning and development process of those neighbourhoods. Citizen groups know what their needs are for housing and they are keen to be involved. Citizens are upskilling themselves or can be upskilled to be able to fully participate in the design and creation of their own neighbourhoods. For example, Initiative Homes in the UK and Nightingale in Australia are not-for-profit social enterprises specializing in housing development that deliver affordable multi-residential housing in cities, that's environmentally sustainable, financially affordable and socially inclusive. Hamilton would benefit from using ethical developers who are able to develop according to these three deliverables.

Qualifications for developers needs to be diversified to include ecological and social skills and knowledge.

Developers have an incredible amount of power in shaping the look, feel, and operation of our communities and city. Their work is highly influential, impactful and literally their decisions are set in stone for generations or even centuries into the future. The outcomes of their work can literally make or break community and social dynamics and environmental health. Just as we would not allow teachers to teach our children without teaching qualifications or doctors to practice without medical qualifications, we wouldn't want developers to develop without having all the skills and expertise that is required of someone who is going to be impacting upon the social and environmental aspects of the community for the long-term. I believe to set the criteria for what developers need to be qualified in, subject matter experts such as community development workers, environmental experts, alternative energy experts, natural building experts, and permaculture designers can be consulted to define subject matter and the minimum standards for getting a developer qualification. Allowing a developer to develop housing and neighbourhoods without knowing about the actual workings of community, social & ecological systems is like allowing an airplane mechanic to fly an airplane—just having the technical knowledge is not enough and our communities will end up crashing if only technical knowledge is the standard criteria that we have for developers to develop our communities.

The process by which communities are able to participate in this housing policy submission process needs to reach out to a greater diversity of people to understand their housing and community needs and visions.

I would suggest that we use the “innovative structured engagement” process as written in the Building Better Neighbourhoods” proposal (link provided below): The facilitation of a co-design process; with a focus on developing a project plan on how to introduce, raise awareness of, and bring into Hamilton more cooperative, ecological, and affordable housing options that meet the needs of an increasingly diverse population.

The population of Hamilton City is projected to increase by 36% over the period from 2013 to 2033. This is higher than the rate of growth for the Waikato region and New Zealand as a whole, both of which are predicted to increase by 26% over this period. Hamilton is also a resettlement community with increasing number of migrants choosing to live here. It is third after Auckland and Wellington for numbers of new migrants for the period March 2015 – March 2017.

The increasing cultural diversity brings many positives to the region in addition to demand for a greater variety of housing options. For example, new families from overseas can be multi-generational and have a desire for self-sustainability as well as a need for strong community support. These requirements can be met via appropriate housing design and development which build and enhance cultural connections. One aspect that must also be considered is around the possible rezoning of land to enable these new neighbourhoods to be developed.

This is the ideal time for key stakeholders to develop a plan to help develop neighbourhoods that make a difference in the quality and health of residents lives, thus meeting the needs of the communities they serve.

There are so many examples around the world of housing developments and neighbourhoods that are successful at addressing the range of human needs of belonging and connection, are environmentally sustainable, and are affordable. This is done through careful, collaborative, and participatory design processes. These communities are known by many names but they all share the ethics of earth care, people care & fair share, operate on sustainability principles, and include participatory decision making and co-design. These intentional communities are known as co-housing, pocket neighbourhoods, and ecovillages.

#### Co-Housing:

The common attributes of any co-housing community include:

- Co-developed, co-designed, and co-organized by residents.
- Extensive common facilities supporting daily life - particularly a common house
- Shared space to enable community interaction, and car-free.
- Resident managed.
- A decision making process free of hierarchy

Earthsong Eco-Neighbourhood in West Auckland is an established co-housing community since 2002. The main founder, Robin, is available to consult to groups, Councils, and communities on establishing co-housing in other areas in NZ. She recently presented to a group in Hamilton who are very keen to see this model happen in Hamilton.

#### Pocket Neighbourhoods:

These are clustered groups of neighbouring houses or apartments gathered around a shared open space — a garden courtyard, a pedestrian street, a series of joined backyards, or a reclaimed alley — all of which have a clear sense of territory and shared stewardship. They can be in urban, suburban or rural areas.

#### Ecovillages

The Eco-village movement in different parts of the world is an attempt to solve different problems from bottom up but in a holistic manner. An ecovillage is an intentional or traditional community using local participatory processes to holistically integrate ecological, economic, social, and cultural dimensions of sustainability in order to regenerate social and natural environments.

#### Affordability & Community Land Trusts

For housing to stay truly affordable, it needs to be situated on a Community Land Trust where the land is held by a non-profit entity for the purposes of stewarding the people and infrastructure on the land. Government can release land to be held in a community land trust in perpetuity for the purpose of keeping all housing and businesses on that land affordable and economically viable despite any housing or economic fluctuations.

#### Converting agricultural land from pasture to Ecological Land Cooperatives

Agricultural land can be much better utilized for both agriculture and housing if it's formed into an ecological land cooperative where the homesteads on the land use the land for ecological-agricultural purposes. A piece of land that once served two purpose—to graze cattle and to support 1 farmer, serve dozens of purposes farming a great diversity of foods and products in a more environmentally sustainable way while providing housing and livelihoods for a number of families. A great example of this is the Ecological Land Cooperative in England.

About me: I've been studying and visiting intentional and sustainable communities for the past 20 years, I have a Masters degree that specializes in participatory community development and social transformation, and I have lived and taught permaculture methods and design since 2007. I am available to speak more about this submission. I am currently the Community Development Worker with Shama.

**References:**

Sustainable Development Goals: <https://sustainabledevelopment.un.org/?menu=1300>

Permaculture Design Ethics and Principles: <https://en.wikipedia.org/wiki/Permaculture>

Initiative Homes: [initiativehomes.co.uk](http://initiativehomes.co.uk)

Nightingale: [nightingalehousing.org](http://nightingalehousing.org)

Co-Housing: <http://cohousing.org.nz/what-cohousing>

Ecovillages: <https://ecovillage.org/projects/what-is-an-ecovillage/>

Community Land Trust: [https://en.wikipedia.org/wiki/Community\\_land\\_trust](https://en.wikipedia.org/wiki/Community_land_trust)

Ecological Land Cooperative: [ecologicaland.coop](http://ecologicaland.coop)

Building Better Neighbourhoods Proposal:

[https://docs.google.com/document/d/1radk7xvR3F4E8BaRhDDA7ng5qZajvS\\_\\_eK3oONwQWE0/edit?usp=sharing](https://docs.google.com/document/d/1radk7xvR3F4E8BaRhDDA7ng5qZajvS__eK3oONwQWE0/edit?usp=sharing)

**Policy Outcomes & Selection Process**

*Section 15 of the proposed policy lists the intended outcomes that Council will seek to achieve by implementing the proposed Housing Accord Policy. Sections 16 to 25 of the proposed policy sets out how Council is proposing to call for and process SHA applications.*

**Do you agree with the proposed policy outcomes?**

No

**Please tick any of the outcomes below that you DO NOT agree with.** *Please select all that apply*

A- Create certainty in respect of Councils approach to Special Housing Areas (SHAs) which assists the development community in making investment decisions;

B- In collaboration with the development community, give effect to the Hamilton Housing Accord and its targets for land supply and housing.

C- The creation of SHAs that achieve the purpose and principles of this Policy.

**Please explain why you don't agree with the outcomes above, or provide an alternative to the proposed outcome.** *(Please reference A, B, C, etc)*

A, B & C: Again, we need to expand the definition of the "development" community to include all those professions that do community development--such as permaculture designers and community development workers--as well as citizen groups who want to lead their own development through informal or formal group status. Housing should not be thought of as a financial investment but rather an investment in the people and ecology of the community. We should not think of housing as a commodity but rather as a basic human right that adds value to community through the people that live there. Again the purpose and principles of the Policy need to be radically expanded.

**Do you have any suggested additional outcomes you think should be added?**

I have detailed these outcomes in my previous answer #8--social, environmental, and economic outcomes.

**Do you agree with the proposed process regarding the selection of SHAs?**

No

**Please explain why you agree/disagree.**

The whole process needs to be refined to be more culturally, socially, and ecologically inclusive. See all my above comments.

**Evaluation Framework**

*The Housing Accord and Special Housing Areas Act 2013 (HASHA Act) prescribes a number of mandatory selection criteria for housing developments within SHAs. Council has the option to set more criteria to guide the selection of SHA in Hamilton.*

*In Schedule 1 of the proposed policy, Council is proposing 4 additional criteria which are:*

53. Location



54. *Affordability*  
 55. *Required minimum number of dwellings*  
 56. *Determining which residential development rules will apply to SHA development*

**Schedule 2 of the proposed policy lists areas that ARE NOT suitable for the establishment of SHA's. Please tick any of the areas below that you think should not be included in Schedule 2. Please select all that apply**

- C- Significant Archaeological, Historic and Cultural Sites  
 D- Electricity Transmission Corridors  
 E- Natural Hazard Areas  
 F- Special Heritage Areas

**Please explain why you think the areas indicated above are suitable for SHA.**

If community is designed to honour the natural ecology of an area, it can actually steward and enhance the ecology of the area. Many intentional communities make great effort to steward their environments and leave as much open and natural spaces as possible.

**Section A6 of the proposed policy requires that SHA's provide a proportion of affordable dwelling, largely determined by the type and size of the dwellings and sections. Do you agree this criteria will enable the supply of comparatively affordable houses? Please select only one item**

Yes

**Please explain why you agree/disagree.**

If the SHA or a portion of it is a Community Land Trust, it will ensure the long-term affordability of those homes. Affordability needs to be looked at through a number of different lenses rather than just purchase price. If a neighbourhood is built to capture passive solar, has solar hot water and alternative energy, has a shared common house and other shared resources, where the residents can do bulk buying or exchange services such as cooking and babysitting, where food can be grown nearby--then life can be more affordable. They can pay a bit more for the house because the other expenses of life are reduced. We need to understand more about social economics and not just numbers on paper.

**Section A6 of the proposed policy also encourages collaborative schemes with Housing New Zealand and Registered SHPs and partnerships between the public and the private housing sectors. Do you agree that the policy should specifically encourage collaboration between social housing providers and private developers? Please select only one item**

Yes

**Please explain why you agree/disagree.**

But, again, we need to expand the role players for delivery of houses to include citizen-led groups and even other non-profits (such as Nightingale Housing) that are social enterprises set up for the purpose of delivering ecologically and socially responsible

**Section A8 of the proposed policy proposed that SHA will be required to contain a minimum number of 10 dwellings. Do you agree with this criteria? Please select only one item**

No

**Please explain why you agree/disagree.**

Again, we need to look at how we design neighbourhoods differently so that they can accommodate even more houses but have more green spaces in between. Have a look at the Earthsong neighbourhood where they have twice the density compared to the same amount

**The minimum number of dwellings criteria will not apply to Housing New Zealand or registered Social Housing providers. Do you agree with this criteria? Please select only one item**

No

**Please explain why you agree/disagree.**

As in my answer above, let's consider the patterns for a healthy, socially and ecologically responsible neighbourhood and be really creative with the use of the space. People who are poor need even better neighbourhood designs to break out of the cycle of poverty. Well designed neighbourhoods breaks isolation and poverty cycles through looking out for one's neighbour, dignity, beauty in the surroundings, healthy food nearby, etc.

**The proposed policy proposes an approach (section A11) to determining which of the existing residential development rules in the Partly Operative District Plan will apply to SHAs. Do you agree with the approach in Section A11?** *Please select only one item*

**Please explain why you agree/disagree.**

I refer to my previous comments.

**Do you have any other comments or feedback about any other aspects of the proposed Housing Accord policy?**

Lots of comments so I look forward to working with the Councillors, HCC staff, developers, and community groups to talk about those things.

I would like to invite Council and the developers to attend a presentation by Robin of Earthsong to learn about co-housing and how we can do it here and visit the Earthsong website as they have many resources which would be helpful to understand better what I'm talking about. And also Nightingale Housing which is already doing this work as a social enterprise developer. I would also like to invite Council, staff, and developers to view the films and see the websites that I've listed as references earlier in the submission. I have a list of short films on alternative models for housing that I didn't include in this submission. The link to that is:

[https://docs.google.com/document/d/1yilBU1Xl3I8vMNa8LhpkydFOAIRB1I1hJY\\_niFvSTfw/edit](https://docs.google.com/document/d/1yilBU1Xl3I8vMNa8LhpkydFOAIRB1I1hJY_niFvSTfw/edit)

## Hearings and Contact Information

**Do you wish to speak in support of your submission at a Council hearing?** *If you don't want to speak at the hearing, but would like staff to know who this submission is from, you are welcome to fill in the Contact Details section.*

Yes

**Are you responding as:** NGO, community group and/or social housing provider  
**What is your name?** Samantha Rose  
**What is your organisation?** Shama  
**Where do you live?**

I am a Hamilton City resident, my suburb is: Bader

or

I live outside the Hamilton boundary, my Council District is:

## Proposed Housing Accord Policy

**Do you agree that Council should have a Housing Accord Policy?**

Yes

**Please explain why you think Council should/should not have a Housing Accord Policy?**

### Policy Principles

*Section 14 of the proposed policy lists the proposed principles that will be promoted by Council when implementing the Housing Accord Policy.*

**Do you agree with the proposed policy principles?**

Yes

**Please tick any of the principles below that you DO NOT agree with.** *Please select all that apply*

**Please explain why you don't agree with the principles above, or provide an alternative to the proposed principle.** *(Please reference A. B. C. etc)*

**Do you have any suggested additional principles you think should be added?**

### Policy Outcomes & Selection Process

*Section 15 of the proposed policy lists the intended outcomes that Council will seek to achieve by implementing the proposed Housing Accord Policy. Sections 16 to 25 of the proposed policy sets out how Council is proposing to call for and process SHA applications.*

**Do you agree with the proposed policy outcomes?**

Yes

**Please tick any of the outcomes below that you DO NOT agree with.** *Please select all that apply*

**Please explain why you don't agree with the outcomes above, or provide an alternative to the proposed outcome.** *(Please reference A. B.C. etc)*

**Do you have any suggested additional outcomes you think should be added?**

**Do you agree with the proposed process regarding the selection of SHAs?**

Yes

**Please explain why you agree/disagree.**

### Evaluation Framework

*The Housing Accord and Special Housing Areas Act 2013 (HASHA Act) prescribes a number of mandatory selection criteria for housing developments within SHAs. Council has the option to set more criteria to guide the selection of SHA in Hamilton.*

*In Schedule 1 of the proposed policy, Council is proposing 4 additional criteria which are:*

57. Location

58. Affordability

59. Required minimum number of dwellings

60. Determining which residential development rules will apply to SHA development

**Schedule 2 of the proposed policy lists areas that ARE NOT suitable for the establishment of SHA's.**

**Please tick any of the areas below that you think should not be included in Schedule 2.** *Please select all that apply*

**Please explain why you think the areas indicated above are suitable for SHA.**

**Section A6 of the proposed policy requires that SHA's provide a proportion of affordable dwelling, largely determined by the type and size of the dwellings and sections. Do you agree this criteria will enable the supply of comparatively affordable houses?** *Please select only one item*

Yes

**Please explain why you agree/disagree.**

14.1 Support smaller types of dwellings

Hamilton Residential Design Survey (Kahikatea Dr) 1989 - REF 711, 580 993 115 1 HAM

"Those in two bedroom houses are more likely to be satisfied than those in three bedroom houses"

"Residents were overwhelmingly glad to own their own home"

Bedrooms per dwelling 2013 census night in Hamilton

49% of dwellings in Hamilton only had one room being used as a sleeping in on census night.

<http://hamiltonurbanblog.co.nz/2015/01/bedrooms-per-dwelling-2013-census-night-in-hamilton/>

14.2 Support smaller size sections - The quotient of allotments available for housing (& pop/area) has been reduced with each review of the District Plan. We need to reverse this trend

1960 = 42,212 people 26.76 km<sup>2</sup> (6,613 acres) = 1,577 people per km<sup>2</sup> (L.G. Westwood, March 1962)

2016 = 161,200 people 111 km<sup>2</sup> = 1,450 people per km<sup>2</sup>

City of Hamilton District Scheme 1963

278 ha (689 acres) excluding streets available for Residential Intensification (10% of Hamilton)

Partly Operative District Plan 2016

210 ha available for Residential Intensification (2% of Hamilton)

**Section A6 of the proposed policy also encourages collaborative schemes with Housing New Zealand and Registered SHPs and partnerships between the public and the private housing sectors. Do you agree that the policy should specifically encourage collaboration between social housing providers and private developers?** *Please select only one item*

Yes

**Please explain why you agree/disagree.**

Support

15.1 These partner have been collaborating to increase housing supply (have a more compact city) for a long time.

15.2 Plan rule book has grown from 70 pages in the 1960/80 to over a 1,000 in 2016'

Turning point appears to be 1991 Town Plan. We

**Section A8 of the proposed policy proposed that SHA will be required to contain a minimum number of 10 dwellings. Do you agree with this criteria?** *Please select only one item*

Yes

**Please explain why you agree/disagree.**

**The minimum number of dwellings criteria will not apply to Housing New Zealand or registered Social Housing providers. Do you agree with this criteria?** *Please select only one item*

Yes

**Please explain why you agree/disagree.**

Support

Government housing providers have the resources to understand the social and political outcome.

**The proposed policy proposes an approach (section A11) to determining which of the existing residential development rules in the Partly Operative District Plan will apply to SHAs. Do you agree with the approach in Section A11?** *Please select only one item*

Yes

**Please explain why you agree/disagree.**

We need to reverse the trend of over-sizing the rule book.

We need to reverse the trend of reducing the locations/availability/number of smaller allotment.

Example

City of Hamilton District Scheme 1963

278 ha (689 acres) excluding streets available for Residential Intensification (10% of area)

Partly Operative District Plan 2016

210 ha available for Residential Intensification (below 2% of area)

**Do you have any other comments or feedback about any other aspects of the proposed Housing Accord policy?**

## Hearings and Contact Information

**Do you wish to speak in support of your submission at a Council hearing?** *If you don't want to speak at the hearing, but would like staff to know who this submission is from, you are welcome to fill in the Contact Details section.*

Yes

**Are you responding as:** Individual  
**What is your name?** Peter H Bos  
**What is your organisation?**  
**Where do you live?**

I am a Hamilton City resident, my suburb is: Bader  
 or

I live outside the Hamilton boundary, my Council District is:

## Proposed Housing Accord Policy

**Do you agree that Council should have a Housing Accord Policy?**

Yes

**Please explain why you think Council should/should not have a Housing Accord Policy?**

### Policy Principles

*Section 14 of the proposed policy lists the proposed principles that will be promoted by Council when implementing the Housing Accord Policy.*

**Do you agree with the proposed policy principles?**

Yes

**Please tick any of the principles below that you DO NOT agree with.** *Please select all that apply*

F- SHAs must be serviced by and integrated with Council's strategic infrastructure networks.

**Please explain why you don't agree with the principles above, or provide an alternative to the proposed principle.** *(Please reference A. B. C. etc)*

F... this makes it difficult to develop off grid or self sufficient homes

**Do you have any suggested additional principles you think should be added?**

Need to incorporate eco design, sustainability and self- sufficiency factors into any new build or development!!

### Policy Outcomes & Selection Process

*Section 15 of the proposed policy lists the intended outcomes that Council will seek to achieve by implementing the proposed Housing Accord Policy. Sections 16 to 25 of the proposed policy sets out how Council is proposing to call for and process SHA applications.*

**Do you agree with the proposed policy outcomes?**

Yes

**Please tick any of the outcomes below that you DO NOT agree with.** *Please select all that apply*

**Please explain why you don't agree with the outcomes above, or provide an alternative to the proposed outcome.** *(Please reference A. B.C. etc)*

**Do you have any suggested additional outcomes you think should be added?**

**Do you agree with the proposed process regarding the selection of SHAs?**

No

**Please explain why you agree/disagree.**

Please can environmental, social and social justice issues and options be considered in full.

### Evaluation Framework

*The Housing Accord and Special Housing Areas Act 2013 (HASHA Act) prescribes a number of mandatory selection criteria for housing developments within SHAs. Council has the option to set more criteria to guide the selection of SHA in Hamilton.*

*In Schedule 1 of the proposed policy, Council is proposing 4 additional criteria which are:*

61. Location

62. Affordability

63. Required minimum number of dwellings

64. Determining which residential development rules will apply to SHA development

**Schedule 2 of the proposed policy lists areas that ARE NOT suitable for the establishment of SHA's. Please tick any of the areas below that you think should not be included in Schedule 2. Please select all that apply**

A- All Special Character Zones (excluding Peacock Terrace Area)

**Please explain why you think the areas indicated above are suitable for SHA.**

**Section A6 of the proposed policy requires that SHA's provide a proportion of affordable dwelling, largely determined by the type and size of the dwellings and sections. Do you agree this criteria will enable the supply of comparatively affordable houses? Please select only one item**

No

**Please explain why you agree/disagree.**

Maybe sometimes. But it is important that affordable doesnt just mean cheaply made or small or located in undesirable locations

**Section A6 of the proposed policy also encourages collaborative schemes with Housing New Zealand and Registered SHPs and partnerships between the public and the private housing sectors. Do you agree that the policy should specifically encourage collaboration between social housing providers and private developers? Please select only one item**

Yes

**Please explain why you agree/disagree.**

Private businesses have a responsibility to consider ethical, environmental and social justice issues in their decision making and actions.

**Section A8 of the proposed policy proposed that SHA will be required to contain a minimum number of 10 dwellings. Do you agree with this criteria? Please select only one item**

Not Answered

**Please explain why you agree/disagree.**

**The minimum number of dwellings criteria will not apply to Housing New Zealand or registered Social Housing providers. Do you agree with this criteria? Please select only one item**

**Please explain why you agree/disagree.**

**The proposed policy proposes an approach (section A11) to determining which of the existing residential development rules in the Partly Operative District Plan will apply to SHAs. Do you agree with the approach in Section A11? Please select only one item**

**Please explain why you agree/disagree.**

**Do you have any other comments or feedback about any other aspects of the proposed Housing Accord policy?**

## Hearings and Contact Information

**Do you wish to speak in support of your submission at a Council hearing? If you don't want to speak at the hearing, but would like staff to know who this submission is from, you are welcome to fill in the Contact Details section.**

No

**Are you responding as:** Individual  
**What is your name?** Camilla Carty-melis  
**What is your organisation?**  
**Where do you live?**

I am a Hamilton City resident, my suburb is: Hamilton East

Or I live outside the Hamilton boundary, my Council District is:

## Proposed Housing Accord Policy

### Do you agree that Council should have a Housing Accord Policy?

Yes

### Please explain why you think Council should/should not have a Housing Accord Policy?

A Housing Accord Policy potentially allows for greater oversight of the development of Special Housing Areas and may help ensure that they deliver affordable housing for Hamilton. In particular, the policy has the possibility of ensuring that Private Housing Providers work with the Social Housing Providers and possibly the Social Service Sector to enable housing developments to meet the needs of lower income communities.

Poverty Action Waikato would like to note concerns regarding market based approaches to addressing social issues that have largely resulted from the dominance of neoliberal, market based policies. These policies have contributed to rising inequality and dwindling social support. The continuation of neoliberal, market based policies cannot be expected to deliver a more equitable society that is accommodating and inclusive of all people.

Housing, under our current economic relations, is a commodity which is speculated on for the purpose of profit. With these current economic arrangements, the removal of planning constraints, allowing for a potential increase in property development will likely not have an impact on housing prices. Housing markets have not provided well for lower income communities,

We encourage the Council to advocate for and support the reinstatement of the provision of State owned, public housing. State housing provides a strong alternative to the private housing market, enabling the housing needs of those excluded and marginalised from the housing market to be met. The large scale building of State owned housing has the potential to drive down the prices of the housing market and result in greater housing affordability.

## Policy Principles

*Section 14 of the proposed policy lists the proposed principles that will be promoted by Council when implementing the Housing Accord Policy.*

### Do you agree with the proposed policy principles?

Not Answered

**Please tick any of the principles below that you DO NOT agree with.** *Please select all that apply*

**Please explain why you don't agree with the principles above, or provide an alternative to the proposed principle.** *(Please reference A. B. C. etc)*

### Do you have any suggested additional principles you think should be added?

Council will monitor the development of Special Housing Areas to ensure that they deliver housing options that meets the needs of lower income communities in Hamilton.

Council will ensure that Private Housing Providers engage with Social Housing Providers and/or the Social Service Sector in the development of the Special Housing Areas.

Council will work with Ngāti Wairere, the Mana Whenua of the Kirikiriroa, to ensure that Mana Whenua perspectives are considered and respected in the development of any Special Housing Area.

## Policy Outcomes & Selection Process

*Section 15 of the proposed policy lists the intended outcomes that Council will seek to achieve by implementing the proposed Housing Accord Policy. Sections 16 to 25 of the proposed policy sets out how Council is proposing to call for and process SHA*



*applications.*

**Do you agree with the proposed policy outcomes?**

No

**Please tick any of the outcomes below that you DO NOT agree with.** *Please select all that apply*

A- Create certainty in respect of Councils approach to Special Housing Areas (SHAs) which assists the development community in making investment decisions;

B- In collaboration with the development community, give effect to the Hamilton Housing Accord and its targets for land supply and housing.

**Please explain why you don't agree with the outcomes above, or provide an alternative to the proposed outcome.** *(Please reference A, B, C, etc)*

We would like to see the 'development community' more specifically described in this policy. In this Housing Accord policy, the development community should include Social Housing Providers and the Social Service Sector who know the needs of lower income communities in Hamilton.

**Do you have any suggested additional outcomes you think should be added?**

**Do you agree with the proposed process regarding the selection of SHAs?**

Not Answered

**Please explain why you agree/disagree.**

## Evaluation Framework

*The Housing Accord and Special Housing Areas Act 2013 (HASHA Act) prescribes a number of mandatory selection criteria for housing developments within SHAs. Council has the option to set more criteria to guide the selection of SHA in Hamilton.*

*In Schedule 1 of the proposed policy, Council is proposing 4 additional criteria which are:*

65. *Location*

66. *Affordability*

67. *Required minimum number of dwellings*

68. *Determining which residential development rules will apply to SHA development*

**Schedule 2 of the proposed policy lists areas that ARE NOT suitable for the establishment of SHA's.**

**Please tick any of the areas below that you think should not be included in Schedule 2.** *Please select all that apply*

**Please explain why you think the areas indicated above are suitable for SHA.**

**Section A6 of the proposed policy requires that SHA's provide a proportion of affordable dwelling, largely determined by the type and size of the dwellings and sections. Do you agree this criteria will enable the supply of comparatively affordable houses?** *Please select only one item*

**Please explain why you agree/disagree.**

**Section A6 of the proposed policy also encourages collaborative schemes with Housing New Zealand and Registered SHPs and partnerships between the public and the private housing sectors. Do you agree that the policy should specifically encourage collaboration between social housing providers and private developers?** *Please select only one item*

Yes

**Please explain why you agree/disagree.**

The Social Housing Provider community in Hamilton, apart from Housing New Zealand, is in its infancy, with limited resources and limited expertise in terms of housing development. The registered Social Housing Providers in Hamilton, along with the Social

**Section A8 of the proposed policy proposed that SHA will be required to contain a minimum number of 10 dwellings. Do you agree with this criteria?** *Please select only one item*

Not Answered

**Please explain why you agree/disagree.**

**The minimum number of dwellings criteria will not apply to Housing New Zealand or registered Social Housing providers. Do you agree with this criteria?** *Please select only one item*

**Please explain why you agree/disagree.**

**The proposed policy proposes an approach (section A11) to determining which of the existing residential development rules in the Partly Operative District Plan will apply to SHAs. Do you agree with the approach in Section A11?** *Please select only one item*

**Please explain why you agree/disagree.**

**Do you have any other comments or feedback about any other aspects of the proposed Housing Accord policy?**

We note that the number of building consent applications has leveled off over the past year. This has been noted to be likely affected by a shortage of skilled workers, increased land prices and the new Reserve Bank's loan to value ratio (LVR) rules. (See Hamilton Housing Market and Economy Growth Indicator Report. <http://www.hamilton.govt.nz/our-city/economicdevelopment/Pages/Hamilton-City-Economic-Reports-and-Indicators.aspx>). We request that Council considers how these barriers may affect the effectiveness of SHA's and the Housing Accord as an approach to addressing affordable housing.

It is not clear whether the Housing Accord in Auckland has delivered an increase in affordable housing. We request that the Special Housing Area policy includes the monitoring of SHA development by Council to assess the extent to which affordable housing is enabled.

## Hearings and Contact Information

**Do you wish to speak in support of your submission at a Council hearing?** *If you don't want to speak at the hearing, but would like staff to know who this submission is from, you are welcome to fill in the Contact Details section.*

Yes

**Are you responding as:** NGO, community group and/or social housing provider

**What is your name?** Anna Casey-Cox

**What is your organisation?** Poverty Action Waikato

**Where do you live?**

I am a Hamilton City resident, my suburb is:

or

I live outside the Hamilton boundary, my Council District is:

## Proposed Housing Accord Policy

### Do you agree that Council should have a Housing Accord Policy?

Yes

### Please explain why you think Council should/should not have a Housing Accord Policy?

Special Housing Areas Policy

Submission by Kevin Ma on 13 July 2017

Housing & neighborhood development needs to be considered as to how they can be the solution to human & societal problems, environmental degradation, and economic disparity—not just an outcome of more structures for people to live in. The criteria and housing outcomes for choosing housing developers and Special Housing Areas needs to be expanded to include social-cultural, ecological, and economic criteria & outcomes—not just how many houses per area of land or how big each dwelling.

Hamilton could harness this Housing Accord grant to become a model city of New Zealand for environmentally sustainable and socially responsible housing, neighbourhoods and community development.

#### Social/Cultural Outcomes

Most people wanting a home want not only a building in which to live but they want a neighbourhood, to feel a sense of belonging and connection, to feel they have a voice in what goes on in their neighbourhood, and to have opportunities to interact with the natural world around them. How we develop houses can either contribute to these human needs or detract from them. For instance, how houses are situated/oriented in relation to each other can offer privacy and autonomy while also giving a sense of belonging and inclusion.

If houses are built like commodities without a holistic approach, people can be left feeling isolated, disconnected, disempowered, and dysfunctional—and all of society and our taxes bear the costs of those negative social outcomes. If houses are designed correctly, communities can become more empowered and resilient to solve their own problems and meet their own needs.

#### Environmental Outcomes

We can significantly reduce the negative effects of climate change, environmental pollution, and loss of biodiversity through designing in what materials we build the houses with and how nature can be incorporated into the design. For instance, we need to consider how the houses can be built with low-embodied energy materials and how they are designed for maximum energy efficiency and passive solar heating. Residents can be more self-sufficient with energy, water, and food. For instance, house designs can include rainwater catchment systems, solar water heaters, and green spaces to absorb water, as food gardens, and as a habitat for biodiversity.

#### Economic Outcomes

Neighbourhoods can be built in a way that enhances the economic opportunities for inhabitants such as where residents can have cottage industries to sell value-added products and services. Many intentional communities have training programmes as social enterprises or small businesses, teaching skills in sustainable living, alternative energy, maintenance, food growing and permaculture design, upcycling skills, etc. Residents can also save money if there are shared community resources and each household doesn't need to have one of every tool. The greatest savings is if the price of land is removed from the housing price—where the land is held by a non-profit Community Land Trust.

Special Areas Housing Criteria & outcomes should include:

- Sustainable Development Goals
- Permaculture Principles
- Outcomes laid out by the community members themselves

- Economic stability and opportunities for economic activity

Housing service providers needs to be expanded to include citizen groups who want to work with developers to co-design their own neighbourhoods.

Only two housing provider entities are mentioned in the policy statement: Private Housing Providers (PHP) and Social Housing Providers (SHP). The most sustainable developments are those where the residents who will be living in those houses or the local community are included in the design planning and development process of those neighbourhoods. Citizen groups know what their needs are for housing and they are keen to be involved. Citizens are upskilling themselves or can be upskilled to be able to fully participate in the design and creation of their own neighbourhoods. For example, Initiative Homes in the UK and Nightingale in Australia are not-for-profit social enterprises specializing in housing development that deliver affordable multi-residential housing in cities, that's environmentally sustainable, financially affordable and socially inclusive. Hamilton would benefit from using ethical developers who are able to develop according to these three deliverables.

Qualifications for developers needs to be diversified to include ecological and social skills and knowledge.

Developers have an incredible amount of power in shaping the look, feel, and operation of our communities and city. Their work is highly influential, impactful and literally their decisions are set in stone for generations or even centuries into the future. The outcomes of their work can literally make or break community and social dynamics and environmental health. Just as we would not allow teachers to teach our children without teaching qualifications or doctors to practice without medical qualifications, we wouldn't want developers to develop without having all the skills and expertise that is required of someone who is going to be impacting upon the social and environmental aspects of the community for the long-term.

I believe to set the criteria for what developers need to be qualified in, subject matter experts such as community development workers, environmental experts, alternative energy experts, natural building experts, and permaculture designers can be consulted to define subject matter and the minimum standards for getting a developer qualification. Allowing a developer to develop housing and neighbourhoods without knowing about the actual workings of community, social & ecological systems is like allowing an airplane mechanic to fly an airplane—just having the technical knowledge is not enough and our communities will end up crashing if only technical knowledge is the standard criteria that we have for developers to develop our communities.

The process by which communities are able to participate in this housing policy submission process needs to reach out to a greater diversity of people to understand their housing and community needs and visions.

I would suggest that we use the “innovative structured engagement” process as written in the Building Better Neighbourhoods” proposal (link provided below): The facilitation of a co-design process; with a focus on developing a project plan on how to introduce, raise awareness of, and bring into Hamilton more cooperative, ecological, and affordable housing options that meet the needs of an increasingly diverse population.

The population of Hamilton City is projected to increase by 36% over the period from 2013 to 2033. This is higher than the rate of growth for the Waikato region and New Zealand as a whole, both of which are predicted to increase by 26% over this period. Hamilton is also a resettlement community with increasing number of migrants choosing to live here. It is third after Auckland and Wellington for numbers of new migrants for the period March 2015 – March 2017.

The increasing cultural diversity brings many positives to the region in addition to demand for a greater variety of housing options. For example, new families from overseas can be multi-generational and have a desire for self-sustainability as well as a need for strong community support. These requirements can

be met via appropriate housing design and development which build and enhance cultural connections. One aspect that must also be considered is around the possible rezoning of land to enable these new neighbourhoods to be developed.

This is the ideal time for key stakeholders to develop a plan to help develop neighbourhoods that make a difference in the quality and health of residents lives, thus meeting the needs of the communities they serve.

There are so many examples around the world of housing developments and neighbourhoods that are successful at addressing the range of human needs of belonging and connection, are environmentally sustainable, and are affordable.

This is done through careful, collaborative, and participatory design processes. These communities are known by many names but they all share the ethics of earth care, people care & fair share, operate on sustainability principles, and include participatory decision making and co-design. These intentional communities are known as co-housing, pocket neighbourhoods, and ecovillages.

#### Co-Housing:

The common attributes of any co-housing community include:

- Co-developed, co-designed, and co-organized by residents.
- Extensive common facilities supporting daily life - particularly a common house
- Shared space to enable community interaction, and car-free.
- Resident managed.
- A decision making process free of hierarchy

Earthsong Eco-Neighbourhood in West Auckland is an established co-housing community since 2002. The main founder, Robin, is available to consult to groups, Councils, and communities on establishing co-housing in other areas in NZ. She recently presented to a group in Hamilton who are very keen to see this model happen in Hamilton.

#### Pocket Neighbourhoods:

These are clustered groups of neighbouring houses or apartments gathered around a shared open space — a garden courtyard, a pedestrian street, a series of joined backyards, or a reclaimed alley — all of which have a clear sense of territory and shared stewardship. They can be in urban, suburban or rural areas.

#### Ecovillages

The Eco-village movement in different parts of the world is an attempt to solve different problems from bottom up but in a holistic manner. An ecovillage is an intentional or traditional community using local participatory processes to holistically integrate ecological, economic, social, and cultural dimensions of sustainability in order to regenerate social and natural environments.

#### Affordability & Community Land Trusts

For housing to stay truly affordable, it needs to be situated on a Community Land Trust where the land is held by a non-profit entity for the purposes of stewarding the people and infrastructure on the land. Government can release land to be held in a community land trust in perpetuity for the purpose of keeping all housing and businesses on that land affordable and economically viable despite any housing or economic fluctuations.

#### Converting agricultural land from pasture to Ecological Land Cooperatives

Agricultural land can be much better utilized for both agriculture and housing if it's formed into a ecological land cooperative where the homesteads on the land use the land for ecological-agricultural purposes. A piece of land that once served two purpose—to graze cattle and to support 1 farmer, serve dozens of purposes farming a great diversity of foods and products in a more environmentally

sustainable way while providing housing and livelihoods for a number of families. A great example of this is the Ecological Land Cooperative in England.

#### References:

Sustainable Development Goals: <https://sustainabledevelopment.un.org/?menu=1300>

Permaculture Design Ethics and Principles: <https://en.wikipedia.org/wiki/Permaculture>

Initiative Homes: [initiativehomes.co.uk](http://initiativehomes.co.uk)

Nightingale: [nightingalehousing.org](http://nightingalehousing.org)

Co-Housing: <http://cohousing.org.nz/what-cohousing>

Ecovillages: <https://ecovillage.org/projects/what-is-an-ecovillage/>

Community Land Trust: [https://en.wikipedia.org/wiki/Community\\_land\\_trust](https://en.wikipedia.org/wiki/Community_land_trust)

Ecological Land Cooperative: [ecologicaland.coop](http://ecologicaland.coop)

Building Better Neighbourhoods Proposal:

[https://docs.google.com/document/d/1radk7xvR3F4E8BaRhDDA7ng5qZajvS\\_\\_eK3oONwQWE0/edit?usp=sharing](https://docs.google.com/document/d/1radk7xvR3F4E8BaRhDDA7ng5qZajvS__eK3oONwQWE0/edit?usp=sharing)

## Policy Principles

*Section 14 of the proposed policy lists the proposed principles that will be promoted by Council when implementing the Housing Accord Policy.*

### Do you agree with the proposed policy principles?

No

**Please tick any of the principles below that you DO NOT agree with.** *Please select all that apply*

C- Council will work collaboratively with private housing providers ('PHPs'), social housing providers ('SHPs') and the Government to increase housing supply and opportunities for affordable housing.

D- Council will enable SHAs that achieve the purpose of HASHAA provided they do not compromise or undermine Council's existing or planned infrastructure, and is generally consistent with Council's strategic land use planning.

F- SHAs must be serviced by and integrated with Council's strategic infrastructure networks.

H- Development within SHAs will be consistent with the evaluation criteria and objectives set out in the schedules to this Policy. Priority will be given to establishing SHAs that are consistent with the strategic direction set within the Partly Operative District Plan ('PODP').

I- Development within SHAs will occur as quickly as practicable.

J- Development of SHAs will achieve high quality urban design outcomes.

**Please explain why you don't agree with the principles above, or provide an alternative to the proposed principle.** *(Please reference A. B. C. etc)*

Principles from the policy that I don't agree with from part 1:

C. Council should also be willing to work with citizen groups who want to co-design their own neighbourhoods. These citizen groups could form themselves into trusts or other entities to be able to proceed with being citizen developers. Council should also convert some of the land into Community Land Trusts to offer true affordability.

D. We need to look at how ecologically built neighbourhoods can supply some of their own infrastructure such as rainwater catchment, biogas digesters, compost toilets, and that strategic land use can include community gardens and even light economic activity such as cottage industries. Land zoned for agriculture can be formed into ecological land cooperatives to allow for many homesteads on a piece of agricultural land.

F. We need to look at where roads are in a community. Houses should have land and foot paths going through the centre of the community--not roads and cars should be kept to the periphery. Again, alternative energy models can ease the need for Council's infrastructure.

H. The criteria and outcomes laid out in this policy are way too narrow. See below for where I expand the list of outcomes and criteria to include social, ecological and economic factors.

I. We are building things that will occupy space and land for centuries to come and how those structures

are built and situated influences whether a community is cohesive or divisive. Permaculture and nature work on slow and steady. Community consultations cannot be rushed. We need houses but we don't want to end up with structures and neighbourhoods can cause more damage than good. We need to balance more housing with good design and wide community consultation.

J. I believe the urban design outcomes also needs to be expanded to include natural building materials, alternative energy, community gardens, north-facing, and other factors. We need to expand these urban design outcomes to be more holistic.

**Do you have any suggested additional principles you think should be added?**

## Policy Outcomes & Selection Process

*Section 15 of the proposed policy lists the intended outcomes that Council will seek to achieve by implementing the proposed Housing Accord Policy. Sections 16 to 25 of the proposed policy sets out how Council is proposing to call for and process SHA applications.*

**Do you agree with the proposed policy outcomes?**

Yes

**Please tick any of the outcomes below that you DO NOT agree with.** *Please select all that apply*

**Please explain why you don't agree with the outcomes above, or provide an alternative to the proposed outcome.** *(Please reference A. B.C. etc)*

**Do you have any suggested additional outcomes you think should be added?**

**Do you agree with the proposed process regarding the selection of SHAs?**

Yes

**Please explain why you agree/disagree.**

## Evaluation Framework

*The Housing Accord and Special Housing Areas Act 2013 (HASHA Act) prescribes a number of mandatory selection criteria for housing developments within SHAs. Council has the option to set more criteria to guide the selection of SHA in Hamilton.*

*In Schedule 1 of the proposed policy, Council is proposing 4 additional criteria which are:*

69. *Location*

70. *Affordability*

71. *Required minimum number of dwellings*

72. *Determining which residential development rules will apply to SHA development*

**Schedule 2 of the proposed policy lists areas that ARE NOT suitable for the establishment of SHA's.**

**Please tick any of the areas below that you think should not be included in Schedule 2.** *Please select all that apply*

**Please explain why you think the areas indicated above are suitable for SHA.**

**Section A6 of the proposed policy requires that SHA's provide a proportion of affordable dwelling, largely determined by the type and size of the dwellings and sections. Do you agree this criteria will enable the supply of comparatively affordable houses?** *Please select only one item*

**Please explain why you agree/disagree.**

**Section A6 of the proposed policy also encourages collaborative schemes with Housing New Zealand and Registered SHPs and partnerships between the public and the private housing sectors. Do you agree that the policy should specifically encourage collaboration between social housing providers and private developers?** *Please select only one item*

Not Answered

**Please explain why you agree/disagree.**

**Section A8 of the proposed policy proposed that SHA will be required to contain a minimum number of 10 dwellings. Do you agree with this criteria?** *Please select only one item*

Not Answered

**Please explain why you agree/disagree.**

**The minimum number of dwellings criteria will not apply to Housing New Zealand or registered Social Housing providers. Do you agree with this criteria?** *Please select only one item*

**Please explain why you agree/disagree.**

**The proposed policy proposes an approach (section A11) to determining which of the existing residential development rules in the Partly Operative District Plan will apply to SHAs. Do you agree with the approach in Section A11?** *Please select only one item*

**Please explain why you agree/disagree.**

**Do you have any other comments or feedback about any other aspects of the proposed Housing Accord policy?**

## Hearings and Contact Information

**Do you wish to speak in support of your submission at a Council hearing?** *If you don't want to speak at the hearing, but would like staff to know who this submission is from, you are welcome to fill in the Contact Details section.*

Yes

**Are you responding as:** NGO, community group and/or social housing provider

**What is your name?** Kevin Ma

**What is your organisation?** Radiance Holistic Health Limited

**Where do you live?**

I am a Hamilton City resident, my suburb is: Chedworth

or

I live outside the Hamilton boundary, my Council District is:



## Proposed Housing Accord Policy

### Do you agree that Council should have a Housing Accord Policy?

No

### Please explain why you think Council should/should not have a Housing Accord Policy?

It is not required by legislation

## Policy Principles

*Section 14 of the proposed policy lists the proposed principles that will be promoted by Council when implementing the Housing Accord Policy.*

### Do you agree with the proposed policy principles?

No

### Please tick any of the principles below that you DO NOT agree with. Please select all that apply

H- Development within SHAs will be consistent with the evaluation criteria and objectives set out in the schedules to this Policy. Priority will be given to establishing SHAs that are consistent with the strategic direction set within the Partly Operative District Plan ('PODP').

### Please explain why you don't agree with the principles above, or provide an alternative to the proposed principle. (Please reference A. B. C. etc)

### Do you have any suggested additional principles you think should be added?

## Policy Outcomes & Selection Process

*Section 15 of the proposed policy lists the intended outcomes that Council will seek to achieve by implementing the proposed Housing Accord Policy. Sections 16 to 25 of the proposed policy sets out how Council is proposing to call for and process SHA applications.*

### Do you agree with the proposed policy outcomes?

No

### Please tick any of the outcomes below that you DO NOT agree with. Please select all that apply

D- Ensure SHAs are generally consistent with and have regard to the relevant provisions of the PODP.

### Please explain why you don't agree with the outcomes above, or provide an alternative to the proposed outcome. (Please reference A. B.C. etc)

### Do you have any suggested additional outcomes you think should be added?

### Do you agree with the proposed process regarding the selection of SHAs?

Yes

### Please explain why you agree/disagree.

## Evaluation Framework

*The Housing Accord and Special Housing Areas Act 2013 (HASHA Act) prescribes a number of mandatory selection criteria for housing developments within SHAs. Council has the option to set more criteria to guide the selection of SHA in Hamilton.*

*In Schedule 1 of the proposed policy, Council is proposing 4 additional criteria which are:*

73. Location

74. Affordability

75. Required minimum number of dwellings

76. Determining which residential development rules will apply to SHA development

**Schedule 2 of the proposed policy lists areas that ARE NOT suitable for the establishment of SHA's. Please tick any of the areas below that you think should not be included in Schedule 2. *Please select all that apply***

**Please explain why you think the areas indicated above are suitable for SHA.**

**Section A6 of the proposed policy requires that SHA's provide a proportion of affordable dwelling, largely determined by the type and size of the dwellings and sections. Do you agree this criteria will enable the supply of comparatively affordable houses? *Please select only one item***

No

**Please explain why you agree/disagree.**

private enterprise should have the ability to find solutions

**Section A6 of the proposed policy also encourages collaborative schemes with Housing New Zealand and Registered SHPs and partnerships between the public and the private housing sectors. Do you agree that the policy should specifically encourage collaboration between social housing providers and private developers? *Please select only one item***

Yes

**Please explain why you agree/disagree.**

**Section A8 of the proposed policy proposed that SHA will be required to contain a minimum number of 10 dwellings. Do you agree with this criteria? *Please select only one item***

Yes

**Please explain why you agree/disagree.**

**The minimum number of dwellings criteria will not apply to Housing New Zealand or registered Social Housing providers. Do you agree with this criteria? *Please select only one item***

No

**Please explain why you agree/disagree.**

**The proposed policy proposes an approach (section A11) to determining which of the existing residential development rules in the Partly Operative District Plan will apply to SHAs. Do you agree with the approach in Section A11? *Please select only one item***

No

**Please explain why you agree/disagree.**

**Do you have any other comments or feedback about any other aspects of the proposed Housing Accord policy?**

## Hearings and Contact Information

**Do you wish to speak in support of your submission at a Council hearing? *If you don't want to speak at the hearing, but would like staff to know who this submission is from, you are welcome to fill in the Contact Details section.***

No

**Are you responding as:** Individual

**What is your name?**

**What is your organisation?**

**Where do you live?**

I am a Hamilton City resident, my suburb is: Hillcrest

or

I live outside the Hamilton boundary, my Council District is:

## Proposed Housing Accord Policy

### Do you agree that Council should have a Housing Accord Policy?

Yes

### Please explain why you think Council should/should not have a Housing Accord Policy?

Policy is required to give necessary detail and guidance to the implementation of Housing Accord. It should inform any development that occurs under the Housing Accord.

## Policy Principles

*Section 14 of the proposed policy lists the proposed principles that will be promoted by Council when implementing the Housing Accord Policy.*

### Do you agree with the proposed policy principles?

Yes

**Please tick any of the principles below that you DO NOT agree with.** *Please select all that apply*

**Please explain why you don't agree with the principles above, or provide an alternative to the proposed principle.** *(Please reference A. B. C. etc)*

### Do you have any suggested additional principles you think should be added?

I think it is important to articulate the need to consider the cultural, social, and economic needs of the community (including wider Hamilton) in the design of any houses and neighbourhoods. This may be a principle in addition to the 'high quality urban design' outcomes - or included with it. We need to actively ensure alternative forms of housing are considered e.g. 'pocket neighbourhoods' or Community Land Trust based models. Along with requirements for active and public transport, and green spaces. These are very important if we are serious about housing affordability.

## Policy Outcomes & Selection Process

*Section 15 of the proposed policy lists the intended outcomes that Council will seek to achieve by implementing the proposed Housing Accord Policy. Sections 16 to 25 of the proposed policy sets out how Council is proposing to call for and process SHA applications.*

### Do you agree with the proposed policy outcomes?

Yes

**Please tick any of the outcomes below that you DO NOT agree with.** *Please select all that apply*

**Please explain why you don't agree with the outcomes above, or provide an alternative to the proposed outcome.** *(Please reference A. B.C. etc)*

### Do you have any suggested additional outcomes you think should be added?

### Do you agree with the proposed process regarding the selection of SHAs?

Yes

### Please explain why you agree/disagree.

Yes, in particular the seeking of feedback from the public and iwi. In addition, and critically, that it positively addresses affordability.

"The delivery of more affordable housing options within qualifying developments will be assessed against the n

## Evaluation Framework

*The Housing Accord and Special Housing Areas Act 2013 (HASHA Act) prescribes a number of mandatory selection criteria for housing developments within SHAs. Council has the option to set more criteria to guide the selection of SHA in Hamilton.*

*In Schedule 1 of the proposed policy, Council is proposing 4 additional criteria which are:*

77. *Location*

78. *Affordability*

79. *Required minimum number of dwellings*

80. *Determining which residential development rules will apply to SHA development*

**Schedule 2 of the proposed policy lists areas that ARE NOT suitable for the establishment of SHA's. Please tick any of the areas below that you think should not be included in Schedule 2.** *Please select all that apply*

**Please explain why you think the areas indicated above are suitable for SHA.**

**Section A6 of the proposed policy requires that SHA's provide a proportion of affordable dwelling, largely determined by the type and size of the dwellings and sections. Do you agree this criteria will enable the supply of comparatively affordable houses?** *Please select only one item*

Yes

**Please explain why you agree/disagree.**

IF this is used through collaborative planning to encourage development of alternative housing supply, such as 'pocket neighbourhoods', co-housing, and Community Land Trusts.

**Section A6 of the proposed policy also encourages collaborative schemes with Housing New Zealand and Registered SHPs and partnerships between the public and the private housing sectors. Do you agree that the policy should specifically encourage collaboration between social housing providers and private developers?** *Please select only one item*

Yes

**Please explain why you agree/disagree.**

Absolutely. We need innovative responses to the housing issue, and we must think about social impact - this affects everyone.

**Section A8 of the proposed policy proposed that SHA will be required to contain a minimum number of 10 dwellings. Do you agree with this criteria?** *Please select only one item*

Yes

**Please explain why you agree/disagree.**

**The minimum number of dwellings criteria will not apply to Housing New Zealand or registered Social Housing providers. Do you agree with this criteria?** *Please select only one item*

No

**Please explain why you agree/disagree.**

I am not too sure why volume should be not a requirement for social housing - unless this is offset by the number of people able to be housed by the development model - such as co-housing. If it is related to affordability of the development - then we might need to get clever about facilitating that in other ways.

**The proposed policy proposes an approach (section A11) to determining which of the existing residential development rules in the Partly Operative District Plan will apply to SHAs. Do you agree with the approach in Section A11?** *Please select only one item*

**Please explain why you agree/disagree.**

**Do you have any other comments or feedback about any other aspects of the proposed Housing Accord policy?**

This is a great opportunity to address housing in an innovative, forward looking way. Please ensure that it does just that, creating vibrant, socially and environmentally robust and connected neighbourhoods, that we would all love to live in.

**Hearings and Contact Information**

**Do you wish to speak in support of your submission at a Council hearing?** *If you don't want to speak at the hearing, but would like staff to know who this submission is from, you are welcome to fill in the Contact Details section.*

No

**Are you responding as:** Individual

**What is your name?** Megan Smith

**What is your organisation?**

**Where do you live?**

I am a Hamilton City resident, my suburb is: Hamilton East

or

I live outside the Hamilton boundary, my Council District is:

## Proposed Housing Accord Policy

### Do you agree that Council should have a Housing Accord Policy?

Yes

### Please explain why you think Council should/should not have a Housing Accord Policy?

I think having ample supply of housing will lower the acquisition cost, especially for those aiming to purchase their first property (law of demand and supply).

## Policy Principles

*Section 14 of the proposed policy lists the proposed principles that will be promoted by Council when implementing the Housing Accord Policy.*

### Do you agree with the proposed policy principles?

Yes

**Please tick any of the principles below that you DO NOT agree with.** *Please select all that apply*

**Please explain why you don't agree with the principles above, or provide an alternative to the proposed principle.** *(Please reference A. B. C. etc)*

**Do you have any suggested additional principles you think should be added?**

## Policy Outcomes & Selection Process

*Section 15 of the proposed policy lists the intended outcomes that Council will seek to achieve by implementing the proposed Housing Accord Policy. Sections 16 to 25 of the proposed policy sets out how Council is proposing to call for and process SHA applications.*

### Do you agree with the proposed policy outcomes?

Yes

**Please tick any of the outcomes below that you DO NOT agree with.** *Please select all that apply*

**Please explain why you don't agree with the outcomes above, or provide an alternative to the proposed outcome.** *(Please reference A. B.C. etc)*

**Do you have any suggested additional outcomes you think should be added?**

### Do you agree with the proposed process regarding the selection of SHAs?

Yes

**Please explain why you agree/disagree.**

## Evaluation Framework

*The Housing Accord and Special Housing Areas Act 2013 (HASHA Act) prescribes a number of mandatory selection criteria for housing developments within SHAs. Council has the option to set more criteria to guide the selection of SHA in Hamilton.*

*In Schedule 1 of the proposed policy, Council is proposing 4 additional criteria which are:*

81. Location
82. Affordability
83. Required minimum number of dwellings
84. Determining which residential development rules will apply to SHA development

**Schedule 2 of the proposed policy lists areas that ARE NOT suitable for the establishment of SHA's.**

**Please tick any of the areas below that you think should not be included in Schedule 2.** *Please select all that apply*

**Please explain why you think the areas indicated above are suitable for SHA.**

**Section A6 of the proposed policy requires that SHA's provide a proportion of affordable dwelling, largely determined by the type and size of the dwellings and sections. Do you agree this criteria will enable the supply of comparatively affordable houses?** *Please select only one item*

**Please explain why you agree/disagree.**

**Section A6 of the proposed policy also encourages collaborative schemes with Housing New Zealand and Registered SHPs and partnerships between the public and the private housing sectors. Do you agree that the policy should specifically encourage collaboration between social housing providers and private developers?** *Please select only one item*

Not Answered

**Please explain why you agree/disagree.**

**Section A8 of the proposed policy proposed that SHA will be required to contain a minimum number of 10 dwellings. Do you agree with this criteria?** *Please select only one item*

Not Answered

**Please explain why you agree/disagree.**

**The minimum number of dwellings criteria will not apply to Housing New Zealand or registered Social Housing providers. Do you agree with this criteria?** *Please select only one item*

No

**Please explain why you agree/disagree.**

**The proposed policy proposes an approach (section A11) to determining which of the existing residential development rules in the Partly Operative District Plan will apply to SHAs. Do you agree with the approach in Section A11?** *Please select only one item*

**Please explain why you agree/disagree.**

**Do you have any other comments or feedback about any other aspects of the proposed Housing Accord policy?**

## Hearings and Contact Information

**Do you wish to speak in support of your submission at a Council hearing?** *If you don't want to speak at the hearing, but would like staff to know who this submission is from, you are welcome to fill in the Contact Details section.*

No

**Are you responding as:** Individual

**What is your name?**

**What is your organisation?**

**Where do you live?**

I am a Hamilton City resident, my suburb is: Melville

or

I live outside the Hamilton boundary, my Council District is:

## Proposed Housing Accord Policy

### Do you agree that Council should have a Housing Accord Policy?

Yes

### Please explain why you think Council should/should not have a Housing Accord Policy?

Please see attached letter

## Policy Principles

*Section 14 of the proposed policy lists the proposed principles that will be promoted by Council when implementing the Housing Accord Policy.*

### Do you agree with the proposed policy principles?

No

### Please tick any of the principles below that you DO NOT agree with. Please select all that apply

H- Development within SHAs will be consistent with the evaluation criteria and objectives set out in the schedules to this Policy. Priority will be given to establishing SHAs that are consistent with the strategic direction set within the Partly Operative District Plan ('PODP').

### Please explain why you don't agree with the principles above, or provide an alternative to the proposed principle. (Please reference A. B. C. etc)

See attached letter

### Do you have any suggested additional principles you think should be added?

## Policy Outcomes & Selection Process

*Section 15 of the proposed policy lists the intended outcomes that Council will seek to achieve by implementing the proposed Housing Accord Policy. Sections 16 to 25 of the proposed policy sets out how Council is proposing to call for and process SHA applications.*

### Do you agree with the proposed policy outcomes?

Yes

### Please tick any of the outcomes below that you DO NOT agree with. Please select all that apply

### Please explain why you don't agree with the outcomes above, or provide an alternative to the proposed outcome. (Please reference A. B.C. etc)

### Do you have any suggested additional outcomes you think should be added?

### Do you agree with the proposed process regarding the selection of SHAs?

No

### Please explain why you agree/disagree.

See attached letter

## Evaluation Framework

*The Housing Accord and Special Housing Areas Act 2013 (HASHA Act) prescribes a number of mandatory selection criteria for housing developments within SHAs. Council has the option to set more criteria to guide the selection of SHA in Hamilton.*

*In Schedule 1 of the proposed policy, Council is proposing 4 additional criteria which are:*

85. Location

86. Affordability

87. Required minimum number of dwellings



88. *Determining which residential development rules will apply to SHA development*

**Schedule 2 of the proposed policy lists areas that ARE NOT suitable for the establishment of SHA's. Please tick any of the areas below that you think should not be included in Schedule 2. Please select all that apply**

**Please explain why you think the areas indicated above are suitable for SHA.**

**Section A6 of the proposed policy requires that SHA's provide a proportion of affordable dwelling, largely determined by the type and size of the dwellings and sections. Do you agree this criteria will enable the supply of comparatively affordable houses? Please select only one item**

No

**Please explain why you agree/disagree.**

See Paragraph 3.9 in attached letter

**Section A6 of the proposed policy also encourages collaborative schemes with Housing New Zealand and Registered SHPs and partnerships between the public and the private housing sectors. Do you agree that the policy should specifically encourage collaboration between social housing providers and private developers? Please select only one item**

No

**Please explain why you agree/disagree.**

See Paragraphs 3.10, 3.11 and 3.12 in the attached letter

**Section A8 of the proposed policy proposed that SHA will be required to contain a minimum number of 10 dwellings. Do you agree with this criteria? Please select only one item**

No

**Please explain why you agree/disagree.**

See Paragraphs 3.10, 3.11 and 3.12 in the attached letter

**The minimum number of dwellings criteria will not apply to Housing New Zealand or registered Social Housing providers. Do you agree with this criteria? Please select only one item**

No

**Please explain why you agree/disagree.**

See Paragraphs 3.10, 3.11 and 3.12 in the attached letter

**The proposed policy proposes an approach (section A11) to determining which of the existing residential development rules in the Partly Operative District Plan will apply to SHAs. Do you agree with the approach in Section A11? Please select only one item**

Yes

**Please explain why you agree/disagree.**

**Do you have any other comments or feedback about any other aspects of the proposed Housing Accord policy?**

Yes, in particular comments relating to Section A4 in Schedule 1 - Locational Considerations (which is not specifically referred to in this on-line feedback form). See Paragraphs 3.4 - 3.8 in attached letter

**Do you have any supporting documentation you would like to include?**

See attached.

## Hearings and Contact Information

**Do you wish to speak in support of your submission at a Council hearing?** *If you don't want to speak at the hearing, but would like staff to know who this submission is from, you are welcome to fill in the Contact Details section.*

Yes

**Are you responding as:** Business (developer, builder, consultant, planner, architect etc)

**What is your name?** Tony McLauchlan

**What is your organisation?** Foster Develop Ltd

**Where do you live?**

I am a Hamilton City resident, my suburb is:

or

I live outside the Hamilton boundary, my Council District is:

## 1. About Foster Develop

- 1.1 Foster Develop is part of the Foster Construction group of companies, formed over forty years ago, operating throughout the Waikato.
- 1.2 Foster Develop has expertise in Office, Retail, Commercial, Industrial and Residential property development and is involved in delivering projects ranging in value from \$2 million to \$70 million.
- 1.3 Foster Develop also have clients and interests in the residential sector and hence may explore the option of utilising the Housing Accords and Special Housing Areas Act (HASHAA) and the Special Housing Areas (SHA) Policy to facilitate housing developments in Hamilton.

## 2. General feedback

- 2.1 Foster Develop appreciates the opportunity to provide feedback on the Policy.
- 2.2 Foster Develop supports the intent of the Policy to enable the establishment of SHAs and enhance housing affordability. However, it is considered that the Policy could be more enabling and there are some limitations that need further consideration in Section 3 below.
- 2.3 Foster Develop supports the purpose of the Housing Accords and Special Housing Areas Act 2013 (HASHAA) to enhance housing affordability by facilitating an increase in land and housing supply in Hamilton.
- 2.4 Foster Develop supports the Housing Accord between Central Government and Hamilton City Council (the Council) and the establishment of special housing areas (SHAs) in Hamilton so as to enhance housing affordability.
- 2.5 Foster Develop notes that the HASHAA requires decisions on greenfield developments to be made within six months and decisions on brownfield developments to be made within three months. That compares with the standard system where it can take up to three years for a decision to be made. Foster Develop support any streamlining of current processes to increase housing supply thus enhancing housing affordability.
- 2.6 Foster Develop generally supports the submission made by the Property Council New Zealand.

## 3. Specific Feedback

### PRINCIPLES

- 3.1 Foster Develop understand that one of the reasons for the government enacting the HASHAA and establishing SHAs is that existing planning frameworks under the RMA have had a significant impact in limiting housing supply and hence affordability.
- 3.2 It is considered that the Policy could be more enabling in this context, as it appears to place greater emphasis on the strategic direction set within the Partly Operative District Plan (PODP) rather than those matters which must be taken into account and weighted in accordance with Section 34(1) of the HASHAA.

### POLICY IMPLEMENTATION CRITERIA

- 3.3 Paragraph 16 of the Policy implies that developers will not be able to actively seek the establishment of SHAs but that the Council will call for proposals from time to time at their discretion. Foster Develop would like the ability to be proactive and submit a proposal for the establishment of an SHA at any given time. The proposed approach could be quite restrictive in terms of allowing developers to respond to market demands in a timely manner.

### SCHEDULE 1 – FRAMEWORK FOR EVALUATING SHAS

#### A4 Locational Considerations

- 3.4 The policy should recognise that some Industrial land is suitable for SHAs, particularly where it adjoins existing residential activity and appropriate reverse sensitivity controls are already in place. Industrial land adjoining residential is generally compromised by Amenity Protection setbacks, landscape buffers, noise and other reverse sensitivity controls.
- 3.5 The policy should recognise that some Industrial land is suitable for SHAs, particularly those sites where industrial development is constrained in some way due to poor access or access that requires cost prohibitive upgrades.
- 3.6 The policy should recognise that some Industrial and Business zoned land is suitable for SHAs, where located in close proximity to significant social infrastructure such as healthcare and/or educational facilities (e.g: Hospital

and/or Waikato University); close to the CBD (and hence assisting with revitalisation of the CBD); and in parts of the city where the availability of residential sections is limited/in short supply.

- 3.7 The policy should encourage the use of lower order business land (i.e. land zoned Business 6) for SHAs particularly where there is existing mixed use development and in certain locations where business activities are no longer viable or supported by the catchment.
- 3.8 The policy should encourage the unlocking and conversion of landholdings that can be utilised for residential in the short-term thus unlocking the supply side over the next 1 - 5 years which is when most of the pressure will come in terms of supply given that the infrastructure for Peacocke and Rotokauri is unlikely to be in place before then.

#### A6 Affordability and A8 Minimum Number of Dwellings

- 3.9 The requirement for a certain proportion of qualifying developments to compromise small subdivision allotment and/or dwellings to deliver more affordable housing is not supported by Foster Develop. The primary purpose of SHA's should be to increase supply, not the provision of housing at particular price points. The market will dictate this and it is through increased supply that house prices will be moderated, not by policy criteria that limits lot sizes and/or only provides for certain types of houses. It is considered that the affordability criteria in A6 (a) – (c) should be removed from the Policy.
- 3.10 Both the private sector and the charitable sector play important roles in enhancing housing affordability and housing supply. There is no good reason in preferring one over the other. In particular, the Accord talks of a "well-functioning private sector led housing market".
- 3.11 The Policy draws a distinction between private housing providers and social housing providers (for example, there is no minimum number of dwellings threshold for Housing NZ or Registered Social Housing Schemes). Foster Develop is unsure of the justifications for this distinction, particularly in the context of achieving the purpose of the HASHAA.
- 3.12 The Policy uses the term 'developers' in some places and the terms 'private housing providers' and 'social housing providers' at other places. Foster Develop recommends that the Council consider replacing the words 'private housing providers' and 'social housing providers' with 'developers'. We note the change will also be of benefit to the Council in the event the Council decides to convert land it owns to housing, and wants to take advantage of the fast-tracking process available for SHAs.

#### **4. Conclusion**

- 4.1 Foster Develop supports the purpose of the Housing Accords and Special Housing Areas Act 2013 (HASHAA) to enhance housing affordability by facilitating an increase in land and housing supply in Hamilton.
- 4.2 Foster Develop supports the intent of the Policy to enable the establishment of SHAs and enhance housing affordability. However, it is considered that the Policy could be more enabling as outlined in this submission.
- 4.3 We would welcome the opportunity to engage further with the Council on the issues raised in this submission, and also assist with further analysis of the Policy.

Yours sincerely



Tony McLauchlan  
Foster Develop Ltd

## Proposed Housing Accord Policy

### Do you agree that Council should have a Housing Accord Policy?

Yes

### Please explain why you think Council should/should not have a Housing Accord Policy?

Adare considers that the Housing Accord Policy serves a useful function in providing affordable housing in appropriate locations and will increase the city's housing supply.

## Policy Principles

*Section 14 of the proposed policy lists the proposed principles that will be promoted by Council when implementing the Housing Accord Policy.*

### Do you agree with the proposed policy principles?

Yes

**Please tick any of the principles below that you DO NOT agree with.** *Please select all that apply*

**Please explain why you don't agree with the principles above, or provide an alternative to the proposed principle.** *(Please reference A. B. C. etc)*

**Do you have any suggested additional principles you think should be added?**

## Policy Outcomes & Selection Process

*Section 15 of the proposed policy lists the intended outcomes that Council will seek to achieve by implementing the proposed Housing Accord Policy. Sections 16 to 25 of the proposed policy sets out how Council is proposing to call for and process SHA applications.*

### Do you agree with the proposed policy outcomes?

Yes

**Please tick any of the outcomes below that you DO NOT agree with.** *Please select all that apply*

**Please explain why you don't agree with the outcomes above, or provide an alternative to the proposed outcome.** *(Please reference A. B.C. etc)*

**Do you have any suggested additional outcomes you think should be added?**

### Do you agree with the proposed process regarding the selection of SHAs?

Yes

**Please explain why you agree/disagree.**

## Evaluation Framework

*The Housing Accord and Special Housing Areas Act 2013 (HASHA Act) prescribes a number of mandatory selection criteria for housing developments within SHAs. Council has the option to set more criteria to guide the selection of SHA in Hamilton.*

*In Schedule 1 of the proposed policy, Council is proposing 4 additional criteria which are:*

89. Location

90. Affordability

91. Required minimum number of dwellings

92. Determining which residential development rules will apply to SHA development

**Schedule 2 of the proposed policy lists areas that ARE NOT suitable for the establishment of SHA's.**

**Please tick any of the areas below that you think should not be included in Schedule 2.** *Please select all that apply*

**Please explain why you think the areas indicated above are suitable for SHA.**

**Section A6 of the proposed policy requires that SHA's provide a proportion of affordable dwelling, largely determined by the type and size of the dwellings and sections. Do you agree this criteria will enable the supply of comparatively affordable houses?** *Please select only one item*

Yes

**Please explain why you agree/disagree.**

Size limitations on allotment and dwelling size will assist in affordability, especially for small family first home buyers.

**Section A6 of the proposed policy also encourages collaborative schemes with Housing New Zealand and Registered SHPs and partnerships between the public and the private housing sectors. Do you agree that the policy should specifically encourage collaboration between social housing providers and private developers?** *Please select only one item*

Yes

**Please explain why you agree/disagree.**

**Section A8 of the proposed policy proposed that SHA will be required to contain a minimum number of 10 dwellings. Do you agree with this criteria?** *Please select only one item*

Yes

**Please explain why you agree/disagree.**

**The minimum number of dwellings criteria will not apply to Housing New Zealand or registered Social Housing providers. Do you agree with this criteria?** *Please select only one item*

Yes

**Please explain why you agree/disagree.**

**The proposed policy proposes an approach (section A11) to determining which of the existing residential development rules in the Partly Operative District Plan will apply to SHAs. Do you agree with the approach in Section A11?** *Please select only one item*

Yes

**Please explain why you agree/disagree.**

Irrespective of what type of housing is proposed it is important that levels of site and neighbourhood amenity are maintained.

**Do you have any other comments or feedback about any other aspects of the proposed Housing Accord policy?**

Adare supports the SHA Policy in general subject to Council prioritising the District Plan and LTCCP identified growth areas including the Peacocke Structure Plan area. Adare considers that the policy will enable the Council to fulfill its obligations under HAASHA while still respecting the strategic land use pattern and infrastructure requirements and staging.

## Hearings and Contact Information

**Do you wish to speak in support of your submission at a Council hearing?** *If you don't want to speak at the hearing, but would like staff to know who this submission is from, you are welcome to fill in the Contact Details section.*

No

**Are you responding as:** Business (developer, builder, consultant, planner, architect etc)  
**What is your name?** Andrew Duncan  
**What is your organisation?** Adare Company Limited  
**Where do you live?**

I am a Hamilton City resident, my suburb is: Peacockes

or

I live outside the Hamilton boundary, my Council District is:

## Proposed Housing Accord Policy

### Do you agree that Council should have a Housing Accord Policy?

Yes

### Please explain why you think Council should/should not have a Housing Accord Policy?

The council should have a Housing Accord policy to speed up building new affordable houses given the rises in population and house prices. Provision should be made for alternative developments such as co-housing, community land trusts, eco villages and pocket neighbourhoods. Policy should also include environmental/sustainability goals and community creation goals which the aforementioned would help ensure.

## Policy Principles

*Section 14 of the proposed policy lists the proposed principles that will be promoted by Council when implementing the Housing Accord Policy.*

### Do you agree with the proposed policy principles?

Yes

**Please tick any of the principles below that you DO NOT agree with.** *Please select all that apply*

**Please explain why you don't agree with the principles above, or provide an alternative to the proposed principle.** *(Please reference A. B. C. etc)*

### Do you have any suggested additional principles you think should be added?

C - social housing providers should include a group of like minded individuals who want to develop an alternative housing model such as co-housing, pocket neighbourhoods, community land trusts or eco villages.

Sustainable, ecological objectives should be included as well as community facilitation through design.

## Policy Outcomes & Selection Process

*Section 15 of the proposed policy lists the intended outcomes that Council will seek to achieve by implementing the proposed Housing Accord Policy. Sections 16 to 25 of the proposed policy sets out how Council is proposing to call for and process SHA applications.*

### Do you agree with the proposed policy outcomes?

Yes

**Please tick any of the outcomes below that you DO NOT agree with.** *Please select all that apply*

**Please explain why you don't agree with the outcomes above, or provide an alternative to the proposed outcome.** *(Please reference A. B.C. etc)*

### Do you have any suggested additional outcomes you think should be added?

### Do you agree with the proposed process regarding the selection of SHAs?

Yes

**Please explain why you agree/disagree.**

## Evaluation Framework

*The Housing Accord and Special Housing Areas Act 2013 (HASHA Act) prescribes a number of mandatory selection criteria for housing developments within SHAs. Council has the option to set more criteria to guide the selection of SHA in Hamilton.*

*In Schedule 1 of the proposed policy, Council is proposing 4 additional criteria which are:*

93. *Location*

94. *Affordability*

95. *Required minimum number of dwellings*

96. *Determining which residential development rules will apply to SHA development*

**Schedule 2 of the proposed policy lists areas that ARE NOT suitable for the establishment of SHA's.**

**Please tick any of the areas below that you think should not be included in Schedule 2.** *Please select all that apply*

**Please explain why you think the areas indicated above are suitable for SHA.**

**Section A6 of the proposed policy requires that SHA's provide a proportion of affordable dwelling, largely determined by the type and size of the dwellings and sections. Do you agree this criteria will enable the supply of comparatively affordable houses?** *Please select only one item*

Yes

**Please explain why you agree/disagree.**

If planned well the SHA should be able to provide a large proportion of affordable dwellings especially if a model such as co-housing is used. In this case all houses are affordable and all benefit from more attractive surroundings if roading and garaging is confined and more land is in common.

**Section A6 of the proposed policy also encourages collaborative schemes with Housing New Zealand and Registered SHPs and partnerships between the public and the private housing sectors. Do you agree that the policy should specifically encourage collaboration between social housing providers and private developers?** *Please select only one item*

Yes

**Please explain why you agree/disagree.**

If social housing providers (which I presume could include groups of individuals who want to invest in an SHA) work with private developers it could be a lot more community determined ie what the people want rather than what the developers give them.

**Section A8 of the proposed policy proposed that SHA will be required to contain a minimum number of 10 dwellings. Do you agree with this criteria?** *Please select only one item*

Yes

**Please explain why you agree/disagree.**

It is hardly worth having a SHA for anything smaller, but it does mean that smaller scale initiatives can be taken.

**The minimum number of dwellings criteria will not apply to Housing New Zealand or registered Social Housing providers. Do you agree with this criteria?** *Please select only one item*

Yes

**Please explain why you agree/disagree.**

They are generally trying to provide housing to a good deal more than 10 units and they will be the ones to provide the larger numbers of housing that are needed.

**The proposed policy proposes an approach (section A11) to determining which of the existing residential development rules in the Partly Operative District Plan will apply to SHAs. Do you agree with the approach in Section A11?** *Please select only one item*

Yes



**Please explain why you agree/disagree.**

It gives adequate provision for minimisation of ugliness in regard to the existing surroundings.

**Do you have any other comments or feedback about any other aspects of the proposed Housing Accord policy?**

I would like to see priority given to developments that encourage community - that the design facilitates people having not only their own private spaces but also more community spaces where people would naturally meet and talk e.g. a cluster of houses around a common green area. Also make sure developments truly are affordable to low income people or have rent to buy or other schemes to enable home ownership.

**Hearings and Contact Information**

**Do you wish to speak in support of your submission at a Council hearing?** *If you don't want to speak at the hearing, but would like staff to know who this submission is from, you are welcome to fill in the Contact Details section.*

Yes

**Are you responding as:** Individual  
**What is your name?** Lynda Jellyman  
**What is your organisation?**  
**Where do you live?**

I am a Hamilton City resident, my suburb is: Maeroa  
or

I live outside the Hamilton boundary, my Council District is: Waikato

## Proposed Housing Accord Policy

### Do you agree that Council should have a Housing Accord Policy?

No

### Please explain why you think Council should/should not have a Housing Accord Policy?

No, because it is not required under legislation. Also, the Housing Accord Policy would add excessive complexities at a time when more land/housing/development is required.

## Policy Principles

*Section 14 of the proposed policy lists the proposed principles that will be promoted by Council when implementing the Housing Accord Policy.*

### Do you agree with the proposed policy principles?

No

### Please tick any of the principles below that you DO NOT agree with. Please select all that apply

A- Council will openly engage with the community on the identification of the potential areas in the City for consideration as Special Housing Area (SHAs).

B- Council will work with Waikato-Tainui to give effect to the co-management arrangements under the Joint Management Agreement in the context of SHAs and will consider effects on the unique tangata whenua relationships, values, aspirations, roles and responsibilities with respect to areas identified for consideration as an SHA.

H- Development within SHAs will be consistent with the evaluation criteria and objectives set out in the schedules to this Policy. Priority will be given to establishing SHAs that are consistent with the strategic direction set within the Partly Operative District Plan ('PODP').

### Please explain why you don't agree with the principles above, or provide an alternative to the proposed principle. (Please reference A. B. C. etc)

Points a & B would create too many delays and hurdles for potential developments.

Points H: SHA's could be hindered by the PODP, sidelining the government's attempts to bring our housing crisis under control.

### Do you have any suggested additional principles you think should be added?

N/A

## Policy Outcomes & Selection Process

*Section 15 of the proposed policy lists the intended outcomes that Council will seek to achieve by implementing the proposed Housing Accord Policy. Sections 16 to 25 of the proposed policy sets out how Council is proposing to call for and process SHA applications.*

### Do you agree with the proposed policy outcomes?

No

### Please tick any of the outcomes below that you DO NOT agree with. Please select all that apply

D- Ensure SHAs are generally consistent with and have regard to the relevant provisions of the PODP.

### Please explain why you don't agree with the outcomes above, or provide an alternative to the proposed outcome. (Please reference A. B.C. etc)

Again, SHA's could be hindered by the PODP, sidelining the government's attempts to bring our housing crisis under control.

### Do you have any suggested additional outcomes you think should be added?

N/A

**Do you agree with the proposed process regarding the selection of SHAs?**

No

**Please explain why you agree/disagree.**

It should be developers who promote SHA's, not the council.

**Evaluation Framework**

*The Housing Accord and Special Housing Areas Act 2013 (HASHA Act) prescribes a number of mandatory selection criteria for housing developments within SHAs. Council has the option to set more criteria to guide the selection of SHA in Hamilton.*

*In Schedule 1 of the proposed policy, Council is proposing 4 additional criteria which are:*

*97. Location*

*98. Affordability*

*99. Required minimum number of dwellings*

*100. Determining which residential development rules will apply to SHA development*

**Schedule 2 of the proposed policy lists areas that ARE NOT suitable for the establishment of SHA's.**

**Please tick any of the areas below that you think should not be included in Schedule 2.** *Please select all that apply*

A- All Special Character Zones (excluding Peacock Terrace Area)

B- All Recreational Zones

C- Significant Archaeological, Historic and Cultural Sites

D- Electricity Transmission Corridors

E- Natural Hazard Areas

F- Special Heritage Areas

G- Special Natural Areas

H- Large Lot Residential Zone

**Please explain why you think the areas indicated above are suitable for SHA.**

N/A

**Section A6 of the proposed policy requires that SHA's provide a proportion of affordable dwelling, largely determined by the type and size of the dwellings and sections. Do you agree this criteria will enable the supply of comparatively affordable houses?** *Please select only one item*

No

**Please explain why you agree/disagree.**

I believe that it is up to the private market and developers to assess and deliver low cost sections and housing.

If there is a demand, there will be a supply. And with the limiting of restrictions on SHA's, the supply will increase, reducing the cost naturally.

**Section A6 of the proposed policy also encourages collaborative schemes with Housing New Zealand and Registered SHPs and partnerships between the public and the private housing sectors. Do you agree that the policy should specifically encourage collaboration between social housing providers and private developers?** *Please select only one item*

Yes

**Please explain why you agree/disagree.**

N/A

**Section A8 of the proposed policy proposed that SHA will be required to contain a minimum number of 10 dwellings. Do you agree with this criteria?** *Please select only one item*

Yes

**Please explain why you agree/disagree.**

N/A

**The minimum number of dwellings criteria will not apply to Housing New Zealand or registered Social Housing providers. Do you agree with this criteria?** *Please select only one item*

Yes

**Please explain why you agree/disagree.**

**The proposed policy proposes an approach (section A11) to determining which of the existing residential development rules in the Partly Operative District Plan will apply to SHAs. Do you agree with the approach in Section A11?** *Please select only one item*

No

**Please explain why you agree/disagree.**

Again, as stated earlier, applying rules from the PODP on SHA's will defeat the purpose of the intended government policies to fix the housing crisis.

**Do you have any other comments or feedback about any other aspects of the proposed Housing Accord policy?**

N/A

## Hearings and Contact Information

**Do you wish to speak in support of your submission at a Council hearing?** *If you don't want to speak at the hearing, but would like staff to know who this submission is from, you are welcome to fill in the Contact Details section.*

No

**Are you responding as:** Business (developer, builder, consultant, planner, architect etc)

**What is your name?** Hartmut Wendt

**What is your organisation?**

**Where do you live?**

I am a Hamilton City resident, my suburb is: Hamilton East

or

I live outside the Hamilton boundary, my Council District is:

## Proposed Housing Accord Policy

### Do you agree that Council should have a Housing Accord Policy?

Yes

### Please explain why you think Council should/should not have a Housing Accord Policy?

All major metropolitan areas in New Zealand are facing significant challenges with the supply and affordability of housing. Given its current and projected population growth rate, Hamilton needs to ensure its housing stock can keep pace with demand.

The Hamilton Housing Accord signed between Central Government and the Hamilton City Council in December last year and ratified by the Council in February this year is a acknowledgment by both parties of the need "to enhance housing affordability by facilitating an increase in land and housing supply". (Draft Hamilton SHA Policy Council Report, para. 23)

In underlining the need for such an Accord and its associated policy, the Council Report indicates that the housing target for 2017 under the Hamilton Housing Accord is 1,300 dwellings. "At this stage of the year, it is forecast that Council is likely to consent 1,262 dwellings based on the 518 actual approved building consents for new dwellings having been issued up to the end of May. 2017". ( para. 130)

I understand that the legislative intent of the Housing Accords and Special Housing Areas Act 2013 (HASHAA) is to speed up the process of bringing to market additional residential land beyond that currently zoned in the Partly Operative District Plan.

As I understand it, the Housing Accord Policy seeks to "give effect to the Hamilton Housing Accord by setting out clear objectives, principles and selection process and criteria to enable SHAs (Social Housing Areas) of scale in Hamilton in areas of the City that are aligned with Council's plans and strategies". (Council Report, para. 36)

In the light of the above, I congratulate the Hamilton City Council on developing a Housing Accord Policy.

### Policy Principles

*Section 14 of the proposed policy lists the proposed principles that will be promoted by Council when implementing the Housing Accord Policy.*

### Do you agree with the proposed policy principles?

Yes

**Please tick any of the principles below that you DO NOT agree with.** *Please select all that apply*

**Please explain why you don't agree with the principles above, or provide an alternative to the proposed principle.** *(Please reference A. B. C. etc)*

**Do you have any suggested additional principles you think should be added?**

### Policy Outcomes & Selection Process

*Section 15 of the proposed policy lists the intended outcomes that Council will seek to achieve by implementing the proposed Housing Accord Policy. Sections 16 to 25 of the proposed policy sets out how Council is proposing to call for and process SHA applications.*

### Do you agree with the proposed policy outcomes?

Yes

**Please tick any of the outcomes below that you DO NOT agree with.** *Please select all that apply*

**Please explain why you don't agree with the outcomes above, or provide an alternative to the proposed outcome.** *(Please reference A. B.C. etc)*

**Do you have any suggested additional outcomes you think should be added?**

I was going to say that my only concern is that the Housing Accord Policy says nothing about social housing, but I'm assuming that's what is meant by the use of the term 'community housing' in the Draft - Hamilton Special Housing Areas Policy document p.5.

**Do you agree with the proposed process regarding the selection of SHAs?**

Yes

**Please explain why you agree/disagree.**

It appears a clear and robust selection process. In the end, it is the Minister of Building & Construction who will make the final decisions!

## Evaluation Framework

*The Housing Accord and Special Housing Areas Act 2013 (HASHA Act) prescribes a number of mandatory selection criteria for housing developments within SHAs. Council has the option to set more criteria to guide the selection of SHA in Hamilton.*

*In Schedule 1 of the proposed policy, Council is proposing 4 additional criteria which are:*

*101. Location*

*102. Affordability*

*103. Required minimum number of dwellings*

*104. Determining which residential development rules will apply to SHA development*

**Schedule 2 of the proposed policy lists areas that ARE NOT suitable for the establishment of SHA's.**

**Please tick any of the areas below that you think should not be included in Schedule 2.** *Please select all that apply*

**Please explain why you think the areas indicated above are suitable for SHA.**

**Section A6 of the proposed policy requires that SHA's provide a proportion of affordable dwelling, largely determined by the type and size of the dwellings and sections. Do you agree this criteria will enable the supply of comparatively affordable houses?** *Please select only one item*

Yes

**Please explain why you agree/disagree.**

The fact that the proposed SHA Policy stipulates that developments by private housing providers (PHPs) would need to include at least 20% of dwellings that are 150 m2 gross floor area or less on sections of 350 m2 or less. Mandating that 1 in 5 houses are smaller dwellings (2 bedroom) on smaller sections is inevitably going to increase the availability of more affordable housing because the land and building costs are less all round. Surely this has to be a good thing for the city.

The proposed minimum number of 10 dwellings does appear to "achieve a balance between enabling SHAs of scale and the limitations of current site availability". (Council Report, para. 82)

**Section A6 of the proposed policy also encourages collaborative schemes with Housing New Zealand and Registered SHPs and partnerships between the public and the private housing sectors. Do you agree that the policy should specifically encourage collaboration between social housing providers and private developers?** *Please select only one item*

Yes

**Please explain why you agree/disagree.**

The bottom line is that we have to increase the housing supply in Hamilton city across the whole housing continuum i.e. emergency - social - assisted rental - assisted ownership - private rental - private ownership. Anything that can be done to encourage collaborative partnerships across all sectors has got

to be a good thing.

I like the incentive for social and private housing providers to collaborate with the proposal being assessed solely against the applicable policy of SHPs i.e. the removal of size restrictions.

The reality is that there are not a large number of registered SHPs in our city and they mostly have limited capital available for development. Any incentives that they can be given to undertake additional residential housing developments and incentives to potential partners be they Housing New Zealand and/or private developers is to be applauded.

I and others in Hamilton's social housing network and Waikato's community funding group would like to see Hamilton City Council be a more active partner in these collaborations referred to above. Planning instruments such as the Housing Accord Policy with its Special Housing Areas are important levers to incentivise the building of more affordable housing in our city, but some of us believe we need to move on multiple fronts to ensure all our people are adequately housed.

**Section A8 of the proposed policy proposed that SHA will be required to contain a minimum number of 10 dwellings. Do you agree with this criteria?** *Please select only one item*

Yes

**Please explain why you agree/disagree.**

I suspect that anything less than 10 dwellings could make many or most SHAs uneconomic to develop, certainly if the developer has to pay the costs of providing infrastructure and/or connecting their development to existing infrastructure.

**The minimum number of dwellings criteria will not apply to Housing New Zealand or registered Social Housing providers. Do you agree with this criteria?** *Please select only one item*

Yes

**Please explain why you agree/disagree.**

As I've said earlier, anything that encourages Housing New Zealand and/or other social housing providers to do more residential housing developments in Hamilton city has got to be a good thing.

**The proposed policy proposes an approach (section A11) to determining which of the existing residential development rules in the Partly Operative District Plan will apply to SHAs. Do you agree with the approach in Section A11?** *Please select only one item*

Yes

**Please explain why you agree/disagree.**

They seem clear and reasonable.

**Do you have any other comments or feedback about any other aspects of the proposed Housing Accord policy?**

I congratulate HCC Planning staff on the good work they have done in developing this Housing Accord Policy. They have clearly consulted with other Councils that have Housing Accords in place and with some key stakeholders in the city, especially in the property development and social housing sector.

This hopefully ensures that the Policy has the greatest possible chance of delivering on both more land and housing being available and being supported by most if not all of the stakeholders in the housing sector in the city.

I would respectfully suggest that the Hamilton City Council's proposed Housing Accord Policy is a promising start in terms of encouraging more supply of land and housing supply, but it is only that - a start. I believe we need to work on multiple fronts and in multiple collaborations to ensure we do

achieve more available, affordable and yet good quality housing.

I'm attaching the recent report of Wellington City's Mayor's Housing Taskforce as an example of bold collaborative thinking and intent around social and affordable housing.

I would like to suggest to Council that just as they have developed a very successful partnership with Momentum Waikato Community Foundation with the aim of delivering a new Waikato Regional Theatre, we could do a similar yet bigger collaboration around social & affordable housing involving central and local Government, private developers, iwi and social housing providers, philanthropy and business.

I would like to respectfully suggest that if Council was willing to spend some if not all of the monies coming to it from the sale of its pensioner housing we may well be able to leverage three, four or five times that amount to good effect in this most crucial are of 'core' services for Council. What can be more core to Council than helping ensure its citizens are all adequately housed?

Wellington is looking to develop a comprehensive housing strategy and plan and a number of us in our community would be willing and able to work with Hamilton City Council to do the same. Together we can!

**Do you have any supporting documentation you would like to include?**

See attached.

## Hearings and Contact Information

**Do you wish to speak in support of your submission at a Council hearing?** *If you don't want to speak at the hearing, but would like staff to know who this submission is from, you are welcome to fill in the Contact Details section.*

Yes

**Are you responding as:** Individual I have not had an opportunity to discuss this with our DV Bryant Trust, but I suspect there would be general support for my submission. I'm confident there would be others in the Hamilton Social Housing Network and Waikato Community Funders Group who would

**What is your name?** Lindsay Cumberpatch

**What is your organisation?** DV Bryant Trust

**Where do you live?**

I am a Hamilton City resident, my suburb is: Hillcrest

or

I live outside the Hamilton boundary, my Council District is:



# ***Report of the Mayor's Housing Taskforce***

JUNE 2017



# ***Kia ora!***

## ***Wellington is the world's best city.***

However, to keep it that way, we've got to solve the housing problems that are affecting our people.

It's clear that housing is the biggest challenge facing Wellington. It is imperative that we find innovative, affordable, and accessible solutions for our city.

Housing is a complex issue, and there will be more than one solution needed. We need to be pulling on every lever and be brave enough to try new things.

We established a Housing Taskforce to use the expert knowledge of the building industry, social services, public health sector, central government, and the property industry to address issues from across the whole housing continuum.

Part of the long-term solution will be a regional approach to housing, as well as a new partnership agreement with central government.

We want to commend the Taskforce for its ambitious and innovative recommendations that provide a comprehensive approach to the issues. We're proud to present these bold and forward thinking recommendations to Wellingtonians.

This independent report makes it clear there is work to do in several areas, but we are committed to leading this programme and are optimistic that we will solve the city's housing problems by delivering solutions with support from the housing sector.

Together, we will make sure Wellington remains a wonderful and liveable city with affordable, dry, warm homes for the people who live here.

**Mayor Justin Lester**

**Deputy Mayor Paul Eagle,  
Mayor's Housing Taskforce Chairman**



## Context

Wellington is undergoing a period of sustained growth, and as a consequence of this growth, faces a range of significant housing affordability and availability challenges. In addition to the current shortfall of approximately 3900 homes in the city, it is forecast that between 20,000 and 30,000 additional housing units will be required to meet the range of projected population growth to 2043. Other key housing drivers are the increasing diverse population and demand for different forms of housing. The city will undergo a shift as our population ages and by 2043 13.5% of city residents will be over 65, compared with 9.6% now. At the same time, the average household size will continue to shrink to about 2.5 people per household. The population in the central city, which grew by almost 100% between 2001 and 2013, is expected to increase further by approximately 84%, from 18,019 in 2013 to 33,150 in 2043. Together with the adjoining residential areas of Mt Victoria, Thorndon, Kelburn, Aro Valley, Mt Cook, Newtown and Berhampore, these areas will continue to attract the majority of renters, rental investors and young, non-family households. The majority of families will however still seek affordable options in the suburbs.

These changes in our population and demand for housing requires the city to adapt its housing stock and future housing to meet these needs, enabling housing in the right places close to the central city, services, community facilities and public transport. Wellington's vibrancy and liveability are key points of difference for the city. Bold ideas, action and leadership, which the city is known for, are required to ensure Wellington continues to build strong, resilient communities and remains an inclusive and affordable place to live, participate and prosper.

## Introduction

Housing affordability is a nationwide issue and while Wellington has not yet reached the crisis situation of Auckland or Queenstown, it still faces a significant challenge. Adequate housing is a key aspect of Wellington's liveability, central to the city's ability to successfully function economically and an essential component in ensuring residents can live healthy and comfortable lives. The November 2016 earthquakes have reiterated the importance of housing and community resilience – and Council's role in ensuring that residents can afford safe, secure homes in connected, resilient communities.

## Mandate

The Mayor's Housing Taskforce, an independent, cross sectoral group, was set up in October 2016 by the Mayor and Deputy Mayor to ensure critical experience and expertise was utilised to address one of the key strategic issues facing the city.

Members of the Taskforce were chosen specifically for their knowledge and expertise and represent the full spectrum of the housing sector. Membership is detailed at Appendix One.

The Taskforce met four times:

- **December 2016** – to discuss the general housing situation in Wellington and the varying perspectives of Taskforce members.
- **March 2017** – to agree the specific details of the problems to be addressed.
- **April 2017** – to discuss a range of potential responses – projects, programmes and policy changes.
- **June 2017** – to consider and agree the recommendations of the Taskforce.



In addition, Deputy Mayor Paul Eagle hosted the Wellington Housing Forum in May 2017 which was attended by over seventy representatives from across the housing sector in the city. Key issues raised in that forum have also been taken into account in developing the draft recommendations.

As Chair of the Taskforce the Deputy Mayor will present the recommendations to the Council's City Strategy Committee in August 2017 for consideration and agreement. If agreed by Committee, then specific programmes, projects, policy amendments and financial considerations will be developed for inclusion in the 2018-28 Long Term Plan.

### **Vision and Goals**

The primary goal of the Taskforce is to recommend strategic approaches and specific projects to realise a city vision of "All Wellingtonians Well Housed". With an aim of building resilient communities through providing a full range of housing affordability and availability opportunities, the Taskforce was

asked to recommend solutions and build consensus around issues including:

- Providing targeted solutions to address all forms of homelessness in the city.
- Rental affordability issues, including security of tenure issues.
- Housing affordability schemes for first time buyers and key worker groups.
- Affordability issues for existing owners in the face of resilience, earthquake prone, leaky building and other maintenance issues.
- The future provision of the city's social housing.
- Housing density and planning.
- Examining housing quality and resilience issues, including the trial of a warrant of fitness applied to rental housing.
- How initiatives will be implemented and actioned.

### **Taskforce Approach**

#### **Why do Housing outcomes matter?**

<b>Towards 2040: Smart Capital</b>	<b>Implications for housing</b>
Connected City: the city's compact form is one of its key strengths and allows for relationships between individuals and communities to form with ease.	Want residential development to occur in ways that protect the best of Wellington's existing natural, built and community environments while providing for population growth.
People-centred city : Cities compete for people, in particular for the highly skilled, educated people who already make up a large proportion of Wellington's population. It will become increasingly important to build on these strengths to ensure the city is open, welcoming, vibrant and embraces diversity.	Want a city that puts people's housing needs front and centre of the city priorities – a place that is welcoming and friendly, provides a range of appropriate opportunities for all, strong neighbourhoods and communities, and embraces differences and changes. Want lower income earners, support workers and students to be able to afford to live in Wellington City.
Dynamic Central City: the central city as a hub of creative enterprise. With universities, research organisations and creative businesses all clustered in or near the central city – alongside a range of related service and support industries – Wellington can grow, taking the wider region to the next step in prosperity and jobs.	Want to provide a range of appropriate housing opportunities for all needs, including providing for those currently excluded from the benefits of economic growth and quality housing.
Eco-city –Wellington will achieve high standards of environmental performance, coupled with outstanding quality of life and an economy increasingly based on smart innovation.	Want Wellington's housing to be resilient to the rigours of its geological and natural environments and to contribute to an environmentally sustainable city.

## **Demand and Supply – Critical Issues**

### **Demand will grow**

1. Due to population growth – forecast population growth, from around 210,000 today to between 250,000 and 280,000 by 2043. They will require between 20,000-30,000 additional housing units.
2. From key workers attracted by Wellington’s growing economy and population who want to live in rather than commute into Wellington.
3. For smaller residential units:
  - From students, as education institutions continue to be successful in attracting students from elsewhere.
  - From graduates and other young adults at the start of their careers.
  - From changes to family and household living arrangements linked to an aging population.
4. For more affordable rental housing and home ownership options.
5. For better quality housing from rising consumer expectations and regulatory requirements, increased demand for more environmentally friendly homes, and for dwellings more resilient to seismic and other natural hazard risks.
6. For emergency and/or supported housing and social housing from a growing number of persons and families facing housing and social exclusion and deprivation.

### **Supply will be constrained**

Supply recently has not matched demand, which in turn means that:

1. Housing affordability overall is deteriorating
2. There is a particular shortage of affordable rental housing for lower income households.
3. House sales have been constrained, limiting options and increasing competition for housing.
4. Housing supply is unable to comfortably absorb the inflows of people migrating and moving to Wellington.
5. The shortage of affordable housing is in turn putting pressure on social housing creating a need for more emergency housing while long term housing solutions are found for vulnerable individuals and families.

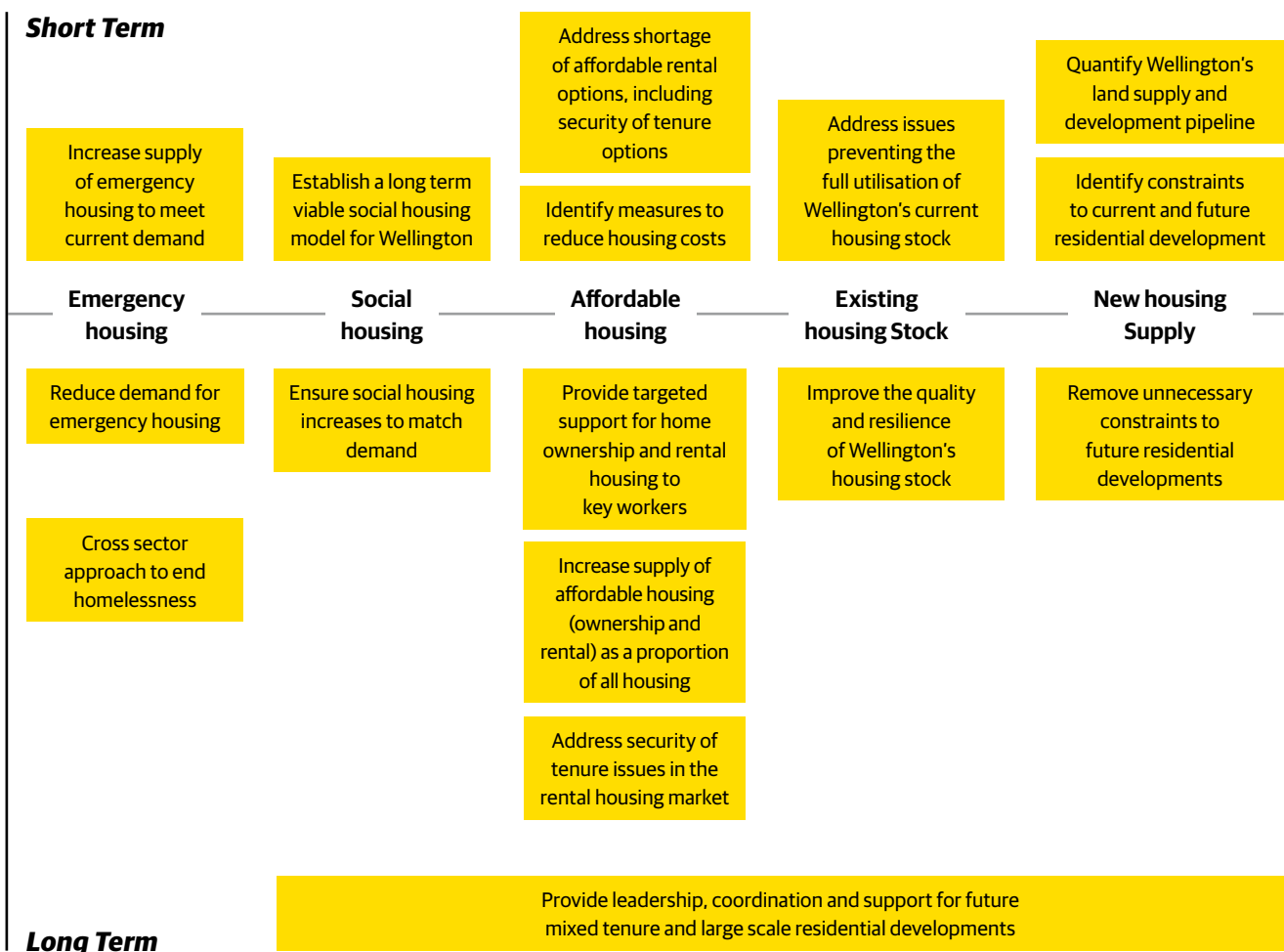
6. There is increased over-crowding, with some of the most vulnerable families living in poor quality housing which impacts on health and wellbeing, reducing resilience and impacting on employability.
7. Some families are finding themselves trapped in a cycle of continually deteriorating living circumstances as rents increase, security of tenure becomes increasingly uncertain and access to employment, education and other services becomes harder.

### **Constraints to be addressed**

A number of related issues constrain and/or add to the cost of new housing supply:

1. No agency has statutory responsibility (and the resources that go with this responsibility) for leadership in addressing homelessness.
2. Delays in joint regional and nationally funded transport projects necessary to unlock green field and brown field sites for development (Grenada-Petone link).
3. Impediments or commercial disincentives on the small number of owners of large green field sites to release sites for development.
4. Difficulties of aggregating land for larger scale brown field development.
5. Costs of building on difficult sites, eg in-fill on back sections, or steep hillsides .
6. Time taken to gain resource consents and/or building consents at scale.
7. Costs of meeting regulatory and/or consumer requirements for quality and resilience.
8. Labour, skill and other input shortages which may impact on construction timeframes.
9. Developer and investor expectations to achieve a certain rate of return on investment, and to optimise cashflows.
10. Any other planning or regulatory obstacles or delays to development including heritage protections.
11. Other risks faced by developers, eg insurance, financing .

### Key objectives of Wellington's housing strategy?



### Formulating the strategy

#### Three key pillars for Council to deliver on the Taskforce housing objectives

The Taskforce believes that success is most likely to occur where the issues of housing are collectively addressed, therefore a collective impact approach is recommended. The objective of this initiative would be to lead and co-ordinate the housing solutions for Wellington which involves all parties.

The Council is in a position where it can provide leadership on this issue and has a number of critical roles which can catalyse change across the housing continuum and provide

the environment for change. The Taskforce encourages the Council to take a strong leadership role based on the following three key strategic planks:

#### 1. Leadership within the sector

Develop a Wellington Housing Strategy and associated Action Plan, to adopt and give effect to the Taskforce vision of "All Wellingtonians Well Housed", to define all parties' interpretation of what housing affordability means in Wellington and to clearly articulate the Council's role in, and approach to, increasing housing supply across all aspects of the housing continuum, with specific projects, programmes, incentives, investments and policy changes to be included in the 2018-28 Council Long Term Plan.

## 2. **A partnership approach with Central Government**

Negotiate an agreement (a “city deal”) to ensure a partnership approach with Housing New Zealand Corporation and other Government agencies on the development and provision of additional social and affordable housing opportunities over the next thirty years. This will also include advocacy to central government on potential regulatory and legislative changes that would have an impact on the provision of housing opportunities in Wellington.

## 3. **A partnership approach with Iwi Partners, the Community Sector and private sector partners including developers, builders and other key parties**

To deliver the vision of “All Wellingtonians Well Housed” that Council take a collective impact approach and work with Iwi Partners, Community Housing Providers and the private development sector to grow the capacity of the housing sector to deliver and manage more social and affordable housing opportunities.

### ***Draft Taskforce Recommendations***

Recommendations focus on those areas where Council, Iwi Partners, Central Government and the broader housing sector across the city can affect the greatest level of change and are set out to reflect the full range of housing issues facing the city:

1. Leadership, Advocacy and Government Relationships
2. Addressing Homelessness
3. Social Housing
4. Housing Affordability – both rental and ownership
5. Housing Regulation
6. Housing Quality and Resilience

### ***Leadership, Advocacy and Government Relationships***

#### **Leadership on housing issues**

The Taskforce recommends that the Council uses its role as a leader in the city to drive the development of the Wellington Housing Strategy (the Strategy) and Action Plan. The objective would be to lead and co-ordinate housing solutions for Wellington and involve all parties.



The Taskforce recommends using a collective impact approach, recognising the range of partners, the expertise, relationships and opportunities in this space. A key component will be to develop a set of principles with a coherent framework to ensure there is understanding and agreement between all parties. This will establish a solid foundation and confidence to enter into agreements and partnerships with other sectors and parties focused on solving the housing issues.

The Strategy would clearly define and express a city vision of "All Wellingtonians Well Housed". The Action Plan would clearly articulate each party's role in, and approach to, increasing housing supply across all aspects of the housing continuum, with specific projects, programmes, investments, incentives and accountabilities. For Council it would also include and investments and policy changes to be included in the 2018-28 Long Term Plan.

The Strategy and Action Plan would incorporate the details required for Addressing Homelessness, Social Housing, Housing Affordability – Ownership and Rental, Housing Regulation, and Housing Quality and Resilience.

There are several critical desired outcomes:

- A clear vision and action plan focused on delivering results with targets, timeframes, priorities and accountabilities.
- Create an agreed framework and principles of how all the different parties will work together, so that the different skills, perspectives and attributes can be used synergistically.
- The ability to create a structure to test and develop new ideas and initiatives.
- To ensure the focus is a Wellington wide solution, and that it has a long term non-political focus to resolving critical issues.
- Clear communication channels to ensure Wellingtonians are part of this journey.
- Ensure that Wellingtons' communities are strengthened as these changes are implemented and actioned.

### Central and Local Government Relationships

To progress the partnership approach the Taskforce recommends Council negotiate a new partnership agreement on housing with Central Government (a "city deal" to include, but not be limited to:

- Progressing accelerated supply of affordable housing – rental and affordable ownership.
- Partnering with Housing New Zealand Corporation and/or other Government housing entities for the appropriate combined or joint provision of new social, emergency and supported housing across the city to meet genuine need of vulnerable people and families.
- Working more closely with other local authorities in the region, to meet the need for social and affordable housing.
- Enabling data sharing between Government Departments, Ministries and Councils in the Wellington region to define the scale of the need for social housing, now and in the future.
- Advocate to Government for legislative changes to enable higher standards of housing to be required for existing and new builds.
- Advocate to Government for legislative changes to guarantee greater security of tenure in the housing rental market – ensuring 'houses' become 'homes' for all Wellingtonians.
- Advocate to Government for a national and joint approach to end homelessness – recognising that homelessness affects a broad range of people and that it requires solutions that are appropriate to need.

### Additional leadership opportunity for Council

The Taskforce recommends that in developing the Strategy Council assesses its own internal practices and policies to deliver the Strategy and its vision.

- Revisit all related Council policies that underpin the vision, incentivise development through investment in associated infrastructure and include a set of target results based on agreed measures of what success looks like, with a clear commitment to measure and regularly report against those targets.
- Undertake a full analysis of the impact of Council's ratings policies, development contributions levies and other regulations which provide financial incentives or disincentives for land development and housing supply whether that be in the areas of investment, development (new/conversion/upgrade), ownership, sale or rental. This review should also consider options around financial mechanisms for Council to capture value from private development at the time the value is realised.





- Refocus internal Council teams and establish external vehicles where necessary to access the appropriate functions to build more housing. The focus will be on delivering at scale, ambitious targets, with regular measurement and reporting against those targets.
- Undertake a review of procurement practices as they relate to housing supply to ensure that these support accelerated progression of the Strategy objectives, including engagement with the market (investors, financiers, developers, constructors, Community Housing Providers (CHPs) inter alia) to understand best practice and better enable and support transactions that are good deals to all parties.
- Investigate releasing Council - owned land for development and ensure that the District Plan and other plans provide sufficient land for residential development.

### **Addressing Homelessness**

The Taskforce recommends that Council lead work to ensure homelessness is rare, brief and non-recurring by progressing the following:

- **Rare** – Engage with the Community Sector to understand the needs of everyone who experiences homelessness and be courageous in developing innovations needed to address this as a problem.
- **Rare** – Prioritise people considered hard-to-reach, vulnerable and marginalised i.e. rough sleepers, and ensure they have sustained support and transition services that will help them move from the street to being housed.

- **Brief** – Establish action-oriented, broad partnerships to provide resources as well as effective and fast-track services for those who experience homelessness.
- **Non- Recurring** – Central and Local Government to implement an incentivised scheme for the private sector landlords and philanthropic investors e.g. rental guarantees, tax reductions, rates rebates and support packages. Make housing the homeless attractive to those who can make a difference.
- **Non-Recurring** – Ensure there are pathways for those who are chronically homeless so they are able to sustain their tenancies in long-term situations.

### **Social Housing**

The Taskforce recommends that Council progress the following:

1. Refurbish and retrofit existing inner city buildings to provide additional social housing units in the central city.
2. Work with MSD and the Community Housing Sector to better understand what other services are necessary when looking at social housing from a social investment perspective.
3. In partnership with Central Government and CHPs increase the number of social units in the city to support the needs of the most vulnerable.
4. Support the growth in capacity and capability of the CHP sector, which is required to move towards a system change that enables CHPs to deliver social housing at scale.
5. Ensure that social housing provides a sustainable housing solution – when developing social housing input is required from tenants, community groups, and the wider community so that it better meets tenant needs.

### **Housing Affordability – ownership and rental**

The Taskforce recommends that Council progress the following:

1. Actively work with CHPs, developers and builders to unlock a pipeline of affordable housing (new/conversions) development.

This may include:

- Refurbish and retrofit existing inner city buildings to provide additional affordable housing units for key worker groups, certain income brackets and those who are entering the housing market for the first time.

- Showcase examples of affordable housing so that residents understand what good quality affordable housing looks like.
  - Support the growth in capacity and capability of the CHP sector, which is required to move towards a system change that enables CHPs to deliver affordable housing opportunities at scale.
2. Identify and work with partners who can develop and introduce a range of tools such as shared equity, rent to buy, co-housing or other affordable housing mechanisms into the Wellington housing market.
  3. Investigate the potential of a range of measures to promote the development of affordable housing including inclusionary zoning to incentivise mixed developments.
  4. Refocus the Housing Accord to ensure that future developments with Special Housing Area designations include affordable housing.
  5. Investigate ways the Council can work with land developers and other councils in the greater Wellington region to:
    - Ensure a consistent pipeline of available and affordable land over time.
    - Work with the construction and training sectors to enable the industry to recruit and retain the necessary skills to deliver housing at scale.
  6. Investigate options for greater tenure security that meets the requirements of both tenants and landlords.



## **Housing Regulation**

The Taskforce recommends that Council progress the following:

1. Measures to:
  - Implement the "one stop shop" concept to improve and speed up the time to market from when a developer lodges initial plans with Council. The Taskforce challenges Council to reduce the time required to complete all parts of the consenting process – from resource and building consents through to Code of Compliance Certification.
  - Establish a Design Review Panel and utilise other consenting models that support new, lower cost construction models which are able to be quickly consented by Council.
  - Ensure the planning environment allows for smaller homes on smaller lots, which are lower priced and more compact.
2. The Council to ensure the District Plan and Wellington Urban Growth Plan (2015) provide sufficient zoned and serviced land to meet the present and future housing needs of the Wellington population.
3. That Council notify District Plan changes that will:
  - Increase housing development potential and densities in Residential Areas.
  - Reduce the requirements for on-site carparking in new housing developments where public transport is readily available, or will be made available at time of occupancy.
  - Increase building height limits and remove the building mass rule (which only allows 75% of sites to be covered in buildings up to the maximum permitted height) so that additional development rights and more apartments can be built on sites.
  - Make retirement villages a permitted activity in all residential zones.
4. Review the 'Code of Practice for Subdivision and Urban Development' and put in place measures to ensure a more flexible and consistent approach to implementing roading and infrastructure standards relating to resource and building consents.

## **Housing Quality and Resilience**

The Taskforce commends the Council for its commitment to improving the quality of rental housing, including private rental housing. The Taskforce recommends a multi-faceted approach to make Wellington homes warm, safe and dry, including:

1. Develop a Wellington City housing quality standard framework to support the Council's work to improve the safety and quality of Wellington's homes.
2. Investigate mechanisms for voluntary inspections of new and existing builds, and implement a pilot to trial.
3. Develop and provide information about what a quality house looks like. This needs to make easy to understand information available to property owners and tenants about how to make a home warm, safe and dry. It should include minimum legal standards, best practice, a range of options and where possible an estimate of costs so owners can plan.
4. Work with landlords and developers to determine whether incentives and assistance would be required and what would be effective if a housing quality standard is introduced. This could tie in with work with landlords and tenants to develop a model for longer term tenancies.
5. Investigate ways to recognise positive landlord/tenant behaviour, and encourage a positive relationship between the two groups. Options include news stories/landlord of the month awards.
6. Explore the range of tools available to incentivise and/or introduce a rental warrant of fitness and associated inspection scheme – eg rates rebates, legislative tools.

## **Appendix One**

### **Members of the Housing Taskforce**

**Deputy Mayor Paul Eagle**, Chair

**Stephanie McIntyre**, Downtown Community Ministry

**Morrie Love**, Wellington Tenth Trust

**Jo Taite**, Kahungunu Whānau Services

**Philippa Howden-Chapman**, Otago University

**Leonie Freeman**, Housing Strategist

**Chris Aiken/ Katja Lietz**, HLC (formerly Hobsonville Land Company)

**Warwick Quinn**, Building and Construction Industry Training Organisation

**Scott Figenshow**, Community Housing Aotearoa

**Peter Dow**, iD Property Consultancy

**Maurice Clark**, Developer, McKee Fehl

**Ian Cassels**, The Wellington Company

**Linda Meade**, Deloitte (Facilitator)





## Proposed Housing Accord Policy

**Do you agree that Council should have a Housing Accord Policy?**

No

**Please explain why you think Council should/should not have a Housing Accord Policy?**

Already too many rules

### Policy Principles

*Section 14 of the proposed policy lists the proposed principles that will be promoted by Council when implementing the Housing Accord Policy.*

**Do you agree with the proposed policy principles?**

No

**Please tick any of the principles below that you DO NOT agree with.** *Please select all that apply*

A- Council will openly engage with the community on the identification of the potential areas in the City for consideration as Special Housing Area (SHAs).

B- Council will work with Waikato-Tainui to give effect to the co-management arrangements under the Joint Management Agreement in the context of SHAs and will consider effects on the unique tangata whenua relationships, values, aspirations, roles and responsibilities with respect to areas identified for consideration as an SHA.

H- Development within SHAs will be consistent with the evaluation criteria and objectives set out in the schedules to this Policy. Priority will be given to establishing SHAs that are consistent with the strategic direction set within the Partly Operative District Plan ('PODP').

**Please explain why you don't agree with the principles above, or provide an alternative to the proposed principle.** *(Please reference A. B. C. etc)*

A & B council should just get on and do it.

H. The District plan has too many rules, the SHA don't need anymore rules.

**Do you have any suggested additional principles you think should be added?**

### Policy Outcomes & Selection Process

*Section 15 of the proposed policy lists the intended outcomes that Council will seek to achieve by implementing the proposed Housing Accord Policy.*

*Sections 16 to 25 of the proposed policy sets out how Council is proposing to call for and process SHA applications.*

**Do you agree with the proposed policy outcomes?**

No

**Please tick any of the outcomes below that you DO NOT agree with.** *Please select all that apply*

D- Ensure SHAs are generally consistent with and have regard to the relevant provisions of the PODP.

**Please explain why you don't agree with the outcomes above, or provide an alternative to the proposed outcome.** *(Please reference A. B.C. etc)*

As stated

**Do you have any suggested additional outcomes you think should be added?**

**Do you agree with the proposed process regarding the selection of SHAs?**

Not Answered

**Please explain why you agree/disagree.**

## Evaluation Framework

*The Housing Accord and Special Housing Areas Act 2013 (HASHA Act) prescribes a number of mandatory selection criteria for housing developments within SHAs. Council has the option to set more criteria to guide the selection of SHA in Hamilton.*

*In Schedule 1 of the proposed policy, Council is proposing 4 additional criteria which are:*

*105. Location*

*106. Affordability*

*107. Required minimum number of dwellings*

*108. Determining which residential development rules will apply to SHA development*

**Schedule 2 of the proposed policy lists areas that ARE NOT suitable for the establishment of SHA's. Please tick any of the areas below that you think should not be included in Schedule 2. Please select all that apply**

**Please explain why you think the areas indicated above are suitable for SHA.**

**Section A6 of the proposed policy requires that SHA's provide a proportion of affordable dwelling, largely determined by the type and size of the dwellings and sections. Do you agree this criteria will enable the supply of comparatively affordable houses? Please select only one item**

No

**Please explain why you agree/disagree.**

Developers should be allowed to find there own way to make housing cheaper

**Section A6 of the proposed policy also encourages collaborative schemes with Housing New Zealand and Registered SHPs and partnerships between the public and the private housing sectors. Do you agree that the policy should specifically encourage collaboration between social housing providers and private developers? Please select only one item**

Yes

**Please explain why you agree/disagree.**

**Section A8 of the proposed policy proposed that SHA will be required to contain a minimum number of 10 dwellings. Do you agree with this criteria? Please select only one item**

Yes

**Please explain why you agree/disagree.**

**The minimum number of dwellings criteria will not apply to Housing New Zealand or registered Social Housing providers. Do you agree with this criteria? Please select only one item**

No

**Please explain why you agree/disagree.**

**The proposed policy proposes an approach (section A11) to determining which of the existing residential development rules in the Partly Operative District Plan will apply to SHAs. Do you agree with the approach in Section A11? Please select only one item**

No

**Please explain why you agree/disagree.**

The plan should not be part of any policy

**Do you have any other comments or feedback about any other aspects of the proposed Housing Accord policy?**

We don't need another policy

**Hearings and Contact Information**

**Do you wish to speak in support of your submission at a Council hearing?** *If you don't want to speak at the hearing, but would like staff to know who this submission is from, you are welcome to fill in the Contact Details section.*

No

**Are you responding as:** Other semi retired building consultant

**What is your name?** Brian goldman

**What is your organisation?**

**Where do you live?**

I am a Hamilton City resident, my suburb is: Rototuna North

or

I live outside the Hamilton boundary, my Council District is:

## Proposed Housing Accord Policy

### Do you agree that Council should have a Housing Accord Policy?

Yes

### Please explain why you think Council should/should not have a Housing Accord Policy?

We agree Council should have a Hamilton Special Housing Areas Policy.

We bring to your attention the inconsistent terminology used in the Draft Hamilton Special Housing Areas Policy document and the titles of this questionnaire/feedback form.

This questionnaire/form is titled 'Proposed Housing Accord Policy'. Consistency in terminology is very important, to avoid creating confusion.

The draft policy currently lacks a Definitions/Interpretation section. This is very much needed, particularly where Council policies are referenced. For clarity, a definition must be given for each acronym used in the policy.

### Policy Principles

*Section 14 of the proposed policy lists the proposed principles that will be promoted by Council when implementing the Housing Accord Policy.*

### Do you agree with the proposed policy principles?

No

### Please tick any of the principles below that you DO NOT agree with. Please select all that apply

- C- Council will work collaboratively with private housing providers ('PHPs'), social housing providers ('SHPs') and the Government to increase housing supply and opportunities for affordable housing.
- D- Council will enable SHAs that achieve the purpose of HASHAA provided they do not compromise or undermine Council's existing or planned infrastructure, and is generally consistent with Council's strategic land use planning.
- H- Development within SHAs will be consistent with the evaluation criteria and objectives set out in the schedules to this Policy. Priority will be given to establishing SHAs that are consistent with the strategic direction set within the Partly Operative District Plan ('PODP').
- J- Development of SHAs will achieve high quality urban design outcomes.

### Please explain why you don't agree with the principles above, or provide an alternative to the proposed principle. (Please reference A. B. C. etc)

Alternatives proposed:

- C. Council will work collaboratively with landowners, developers, private housing providers, social housing providers and the Government to increase housing supply and opportunities for affordable housing in Hamilton City.
- D. Council will enable SHAs that achieve the purpose of the HASHAA, by bringing to market additional land beyond that currently zoned residential and may enhance Council's existing or planned infrastructure.
- H. Development within SHAs will be consistent with the evaluation criteria and objectives set out in the schedules to this Policy and generally consistent with HCC Urban Design Approach.
- J. Delete. This point is too subjective. The intent is covered elsewhere in the Policy, in Schedule 1, Section A6: Affordability & Outcomes a. to e.

Note: Landowners, developers, private housing providers & social housing providers should be collectively known as 'the development community' throughout the Policy, as referred to in the draft Policy document, Point 15.



**Do you have any suggested additional principles you think should be added?**

The number one, most important principle for the HCC Policy is that it should align with the purpose of the HASHAA. Therefore 'D' should become 'A' in the list of principles.

**Policy Outcomes & Selection Process**

*Section 15 of the proposed policy lists the intended outcomes that Council will seek to achieve by implementing the proposed Housing Accord Policy. Sections 16 to 25 of the proposed policy sets out how Council is proposing to call for and process SHA applications.*

**Do you agree with the proposed policy outcomes?**

No

**Please tick any of the outcomes below that you DO NOT agree with.** *Please select all that apply*

C- The creation of SHAs that achieve the purpose and principles of this Policy.

D- Ensure SHAs are generally consistent with and have regard to the relevant provisions of the PODP.

**Please explain why you don't agree with the outcomes above, or provide an alternative to the proposed outcome.** *(Please reference A. B.C. etc)*

The focus must always be on the HASHAA, because the Housing Accord has been created to remove planning roadblocks and to streamline processes, therefore we propose the following alternatives:

C. The creation of SHAs which achieve the purpose and principles of the HASHAA.

D. Should be removed. The PODP creates the risk of delaying the fast-track process supported by the HASHAA.

**Do you have any suggested additional outcomes you think should be added?**

HCC should consider and adopt the Tauranga City Council Process Summary Flow Chart. This is much more straightforward and has allowed a number of SHAs to progress since it was implemented in Tauranga City.

Reference : Tauranga City Council website : Council Lead Policy :  
Housing Accords & Special Housing Areas Act 2013  
Implementation Guidelines  
Point 9. Appendix 1 Process Summary Flow Chart

**Do you agree with the proposed process regarding the selection of SHAs?**

No

**Please explain why you agree/disagree.**

Amendments are needed to :

16. Council will, from time to time, (delete at it's discretion) publicly call for proposals from the development community seeking to become a SHA. Proposals can be made by any party, including Council.

17. Council will process and assess all proposals for SHAs in the manner set out in the final version of Hamilton Special Housing Areas Policy.

18. The evaluation criteria which Council will apply to assessment of a proposal are set out in the Schedules to the Policy . Proposals will need to demonstrate how they satisfy all of the mandatory and discretionary criteria attached to the final version of Hamilton Special Housing Areas Policy.

**Evaluation Framework**

*The Housing Accord and Special Housing Areas Act 2013 (HASHA Act) prescribes a number of mandatory selection criteria for housing developments within SHAs. Council has the option to set more criteria to guide the selection of SHA in Hamilton.*

*In Schedule 1 of the proposed policy, Council is proposing 4 additional criteria which are:*

*109. Location*

*110. Affordability*

*111. Required minimum number of dwellings*

*112. Determining which residential development rules will apply to SHA development*

**Schedule 2 of the proposed policy lists areas that ARE NOT suitable for the establishment of SHA's.**

**Please tick any of the areas below that you think should not be included in Schedule 2.** *Please select all that apply*

**Please explain why you think the areas indicated above are suitable for SHA.**

We agree the areas listed are not suitable for the establishment of SHAs.

**Section A6 of the proposed policy requires that SHA's provide a proportion of affordable dwelling, largely determined by the type and size of the dwellings and sections. Do you agree this criteria will enable the supply of comparatively affordable houses?** *Please select only one item*

No

**Please explain why you agree/disagree.**

A6 e. The examples should be expanded to include retirees, public sector workers (teachers, police, fire personnel) and refugee housing.

A6 f. & g. There is no reference or requirement in the HASHAA for Housing New Zealand or Social Housing Providers to be specifically engaged with or accommodated.

A6 final paragraph - There should not be any dispensation, under the Policy, for Social Housing Providers. Proposals from Social Housing Providers must be assessed according to the same criteria as the development community and not be given any preferential treatment.

**Section A6 of the proposed policy also encourages collaborative schemes with Housing New Zealand and Registered SHPs and partnerships between the public and the private housing sectors. Do you agree that the policy should specifically encourage collaboration between social housing providers and private developers?** *Please select only one item*

No

**Please explain why you agree/disagree.**

We strongly disagree. Council should not enter in to this. As pointed out in our response to Section 14 above, there is no reference or requirement in the HASHAA for Housing New Zealand or Social Housing Providers to be specifically engaged with or accommodated.

A6 f in the draft Policy states collaboration is required (not merely encouraged).

We do not agree with collaboration being a requirement.

This area is too prescriptive and potentially uncompetitive.

It should be left to the market to form partnerships.

Re Tauranga City Council Policy does not prescribe to this type of collaboration, but nor does it rule out such collaboration.

Auckland City Council Policy became so prescriptive that a number of SHAs have now become disestablished.

**Section A8 of the proposed policy proposed that SHA will be required to contain a minimum number of 10 dwellings. Do you agree with this criteria?** *Please select only one item*

Yes

**Please explain why you agree/disagree.**

Specifying a minimum of 10 dwellings will prevent applications for SHAs on small city sections with capacity for less than 10 dwellings.

A minimum number of 10 dwellings should allow for the spread or mix of size and type of sections/dwellings to be developed on a SHA, while remaining profitable and commercially viable.

**The minimum number of dwellings criteria will not apply to Housing New Zealand or registered Social Housing providers. Do you agree with this criteria?** *Please select only one item*

No

**Please explain why you agree/disagree.**

This is not supported by the HASHAA, nor does the Act identify any criteria for Housing New Zealand or Social Housing Providers.

There must be a level playing field for all SHAs and therefore, if HCC wants to include Housing New Zealand and Social Housing Providers, HCC must ensure Housing New Zealand and Social Housing Providers are bound by the same rules as the development community.

**The proposed policy proposes an approach (section A11) to determining which of the existing residential development rules in the Partly Operative District Plan will apply to SHAs. Do you agree with the approach in Section A11?** *Please select only one item*

No

**Please explain why you agree/disagree.**

The spirit of the HASHAA was to cut through existing red tape and fast-track affordable housing on land not previously available. We therefore do not agree with the opening paragraph in A11. Nor do we agree with Sections A11c and A11d.

We do agree with Sections A11a, A11b, A11e and A11f.

**Do you have any other comments or feedback about any other aspects of the proposed Housing Accord policy?**

The whole of Schedule 1 is unnecessarily complex. HCC could better adopt the Tauranga City Council Process Summary Flow Chart. It is much more straightforward and has allowed a number of SHAs to progress since it was implemented in Tauranga.

Refer Tauranga City Council website: Council Lead Policy: Housing Accords and Special Housing Areas Act 2013 - Implementation Guidelines, Section 9 Appendix 1  
Process Summary Flow Chart

A register of approved SHAs must be publicly available, on HCC website.

It would also be useful to include on the website a register of qualifying developments and the members of the development community involved with each.

Note : The Policy needs to keep terminology consistent throughout. Instead of using acronyms such as PHPs & SHPs, which excludes landowners and developers, the more encompassing term 'the development community' should be used throughout.

## Hearings and Contact Information

**Do you wish to speak in support of your submission at a Council hearing?** *If you don't want to speak at the hearing, but would like staff to know who this submission is from, you are welcome to fill in the Contact Details section.*

Yes

**Are you responding as:** Individual  
**What is your name?** Dean Marshall and Lynn Cheryl Hutchinson  
**What is your organisation?** Private Landowners  
**Where do you live?**

I am a Hamilton City resident, my suburb is: Te Rapa

or

I live outside the Hamilton boundary, my Council District is:

## Proposed Housing Accord Policy

### Do you agree that Council should have a Housing Accord Policy?

Not Answered

### Please explain why you think Council should/should not have a Housing Accord Policy?

Don't know.

## Policy Principles

*Section 14 of the proposed policy lists the proposed principles that will be promoted by Council when implementing the Housing Accord Policy.*

### Do you agree with the proposed policy principles?

Not Answered

**Please tick any of the principles below that you DO NOT agree with.** *Please select all that apply*

**Please explain why you don't agree with the principles above, or provide an alternative to the proposed principle.** *(Please reference A. B. C. etc)*

### Do you have any suggested additional principles you think should be added?

Recommend that SHAs are developed in such a way that there is diversity of family types and age groups in each area. In Hamilton we have a proliferation of retirement villages, gated communities where people with time and wisdom to share are specifically isolated from the families they could be supporting and from whom they could receive support. Cutting off 70 plus year olds by having them congregate in so-called "villages" runs counter to the notion of richly diverse communities.

Strongly support "E" in question 4. Ageing population who are not ensconced in retirement villages are occupying homes and land that are bigger than they necessarily require because of the shortage of two- and three-bedroom homes with shared facilities. Allowing those who do not wish to move into God's Waiting Rooms to live in smaller houses in diverse neighbourhoods would free up larger homes for people with children.

## Policy Outcomes & Selection Process

*Section 15 of the proposed policy lists the intended outcomes that Council will seek to achieve by implementing the proposed Housing Accord Policy. Sections 16 to 25 of the proposed policy sets out how Council is proposing to call for and process SHA applications.*

### Do you agree with the proposed policy outcomes?

Not Answered

**Please tick any of the outcomes below that you DO NOT agree with.** *Please select all that apply*

**Please explain why you don't agree with the outcomes above, or provide an alternative to the proposed outcome.** *(Please reference A. B.C. etc)*

### Do you have any suggested additional outcomes you think should be added?

### Do you agree with the proposed process regarding the selection of SHAs?

Not Answered

**Please explain why you agree/disagree.**

## Evaluation Framework

*The Housing Accord and Special Housing Areas Act 2013 (HASHA Act) prescribes a number of mandatory selection criteria for*

housing developments within SHAs. Council has the option to set more criteria to guide the selection of SHA in Hamilton.

In Schedule 1 of the proposed policy, Council is proposing 4 additional criteria which are:

113. Location

114. Affordability

115. Required minimum number of dwellings

116. Determining which residential development rules will apply to SHA development

**Schedule 2 of the proposed policy lists areas that ARE NOT suitable for the establishment of SHA's. Please tick any of the areas below that you think should not be included in Schedule 2. Please select all that apply**

**Please explain why you think the areas indicated above are suitable for SHA.**

**Section A6 of the proposed policy requires that SHA's provide a proportion of affordable dwelling, largely determined by the type and size of the dwellings and sections. Do you agree this criteria will enable the supply of comparatively affordable houses? Please select only one item**

Yes

**Please explain why you agree/disagree.**

**Section A6 of the proposed policy also encourages collaborative schemes with Housing New Zealand and Registered SHPs and partnerships between the public and the private housing sectors. Do you agree that the policy should specifically encourage collaboration between social housing providers and private developers? Please select only one item**

Yes

**Please explain why you agree/disagree.**

**Section A8 of the proposed policy proposed that SHA will be required to contain a minimum number of 10 dwellings. Do you agree with this criteria? Please select only one item**

Yes

**Please explain why you agree/disagree.**

Agree - A cluster of 10 or more homes allows for diversity within the communities created and for more cost-effective sharing of any joint facilities and resources.

**The minimum number of dwellings criteria will not apply to Housing New Zealand or registered Social Housing providers. Do you agree with this criteria? Please select only one item**

Yes

**Please explain why you agree/disagree.**

Agree - Clustering social housing has the effect of putting economically disadvantaged people in the same tight location - potential for social stigma to be associated with such an area. Families in social housing often require support themselves. Could be more beneficial to scatter social housing in more diverse clusters alongside households that are in a better position to support those who need it most.

**The proposed policy proposes an approach (section A11) to determining which of the existing residential development rules in the Partly Operative District Plan will apply to SHAs. Do you agree with the approach in Section A11? Please select only one item**

**Please explain why you agree/disagree.**

**Do you have any other comments or feedback about any other aspects of the proposed Housing Accord policy?**

## Hearings and Contact Information

**Do you wish to speak in support of your submission at a Council hearing?** *If you don't want to speak at the hearing, but would like staff to know who this submission is from, you are welcome to fill in the Contact Details section.*

No

**Are you responding as:** Individual

**What is your name?** Diana Wood

**What is your organisation?** replying as individual, but am Chair of North East Community Hub

**Where do you live?**

I am a Hamilton City resident, my suburb is: Flagstaff

or

I live outside the Hamilton boundary, my Council District is:

## Proposed Housing Accord Policy

**Do you agree that Council should have a Housing Accord Policy?**

Yes

**Please explain why you think Council should/should not have a Housing Accord Policy?**

### Policy Principles

*Section 14 of the proposed policy lists the proposed principles that will be promoted by Council when implementing the Housing Accord Policy.*

**Do you agree with the proposed policy principles?**

Yes

**Please tick any of the principles below that you DO NOT agree with.** *Please select all that apply*

**Please explain why you don't agree with the principles above, or provide an alternative to the proposed principle.** *(Please reference A. B. C. etc)*

**Do you have any suggested additional principles you think should be added?**

I would like to see that J "high quality urban design outcomes" includes references to sustainability, green areas, ecological principles, aesthetics and community interaction.

### Policy Outcomes & Selection Process

*Section 15 of the proposed policy lists the intended outcomes that Council will seek to achieve by implementing the proposed Housing Accord Policy. Sections 16 to 25 of the proposed policy sets out how Council is proposing to call for and process SHA applications.*

**Do you agree with the proposed policy outcomes?**

Not Answered

**Please tick any of the outcomes below that you DO NOT agree with.** *Please select all that apply*

**Please explain why you don't agree with the outcomes above, or provide an alternative to the proposed outcome.** *(Please reference A. B.C. etc)*

**Do you have any suggested additional outcomes you think should be added?**

**Do you agree with the proposed process regarding the selection of SHAs?**

Not Answered

**Please explain why you agree/disagree.**

### Evaluation Framework

*The Housing Accord and Special Housing Areas Act 2013 (HASHA Act) prescribes a number of mandatory selection criteria for housing developments within SHAs. Council has the option to set more criteria to guide the selection of SHA in Hamilton.*

*In Schedule 1 of the proposed policy, Council is proposing 4 additional criteria which are:*

*117. Location*

*118. Affordability*

*119. Required minimum number of dwellings*

*120. Determining which residential development rules will apply to SHA development*

**Schedule 2 of the proposed policy lists areas that ARE NOT suitable for the establishment of SHA's.**

**Please tick any of the areas below that you think should not be included in Schedule 2.** *Please select all that apply*



**Please explain why you think the areas indicated above are suitable for SHA.**

**Section A6 of the proposed policy requires that SHA's provide a proportion of affordable dwelling, largely determined by the type and size of the dwellings and sections. Do you agree this criteria will enable the supply of comparatively affordable houses?** *Please select only one item*

**Please explain why you agree/disagree.**

**Section A6 of the proposed policy also encourages collaborative schemes with Housing New Zealand and Registered SHPs and partnerships between the public and the private housing sectors. Do you agree that the policy should specifically encourage collaboration between social housing providers and private developers?** *Please select only one item*

Not Answered

**Please explain why you agree/disagree.**

**Section A8 of the proposed policy proposed that SHA will be required to contain a minimum number of 10 dwellings. Do you agree with this criteria?** *Please select only one item*

Not Answered

**Please explain why you agree/disagree.**

**The minimum number of dwellings criteria will not apply to Housing New Zealand or registered Social Housing providers. Do you agree with this criteria?** *Please select only one item*

**Please explain why you agree/disagree.**

**The proposed policy proposes an approach (section A11) to determining which of the existing residential development rules in the Partly Operative District Plan will apply to SHAs. Do you agree with the approach in Section A11?** *Please select only one item*

**Please explain why you agree/disagree.**

**Do you have any other comments or feedback about any other aspects of the proposed Housing Accord policy?**

Hamilton has the opportunity to create housing developments which are forward thinking and incorporate modern ideas in terms of the environment. We could create something which provides a model for other cities, and for further developments in the future.

We do NOT want to see more of the buildings which are springing up around the University. They are ugly, have no possibilities for gardens, even shared, and only seem to encourage social isolation. There are so many good ideas that can be drawn on. Please use them.

## Hearings and Contact Information

**Do you wish to speak in support of your submission at a Council hearing?** *If you don't want to speak at the hearing, but would like staff to know who this submission is from, you are welcome to fill in the Contact Details section.*

No

**Are you responding as:** Individual  
**What is your name?** Alison Littler  
**What is your organisation?**  
**Where do you live?**

I am a Hamilton City resident, my suburb is: Riverlea  
 or

I live outside the Hamilton boundary, my Council District is:

## Proposed Housing Accord Policy

### Do you agree that Council should have a Housing Accord Policy?

Yes

### Please explain why you think Council should/should not have a Housing Accord Policy?

Habitat for Humanity (Central North Island) Ltd (Habitat) supports the Housing Accord between Central Government and Hamilton City Council (the Council) and the establishment of special housing areas (SHAs) in Hamilton so as to enhance housing affordability.

### Policy Principles

Section 14 of the proposed policy lists the proposed principles that will be promoted by Council when implementing the Housing Accord Policy.

### Do you agree with the proposed policy principles?

No

### Please tick any of the principles below that you DO NOT agree with. Please select all that apply

B- Council will work with Waikato-Tainui to give effect to the co-management arrangements under the Joint Management Agreement in the context of SHAs and will consider effects on the unique tangata whenua relationships, values, aspirations, roles and responsibilities with respect to areas identified for consideration as an SHA.

D- Council will enable SHAs that achieve the purpose of HASHAA provided they do not compromise or undermine Council's existing or planned infrastructure, and is generally consistent with Council's strategic land use planning.

F- SHAs must be serviced by and integrated with Council's strategic infrastructure networks.

G- Where Council's strategic infrastructure networks are unavailable to an SHA for any reason, including but not limited to lack of network capacity or connectivity, all necessary infrastructure will be provided and funded by the developer at no cost to Council.

H- Development within SHAs will be consistent with the evaluation criteria and objectives set out in the schedules to this Policy. Priority will be given to establishing SHAs that are consistent with the strategic direction set within the Partly Operative District Plan ('PODP').

J- Development of SHAs will achieve high quality urban design outcomes.

### Please explain why you don't agree with the principles above, or provide an alternative to the proposed principle. (Please reference A. B. C. etc)

1.1 B, D, H & J: We concur with the Property Council that the reasons for enacting the HASHAA and establishing SHAs is that the standard planning process has fallen short of enabling sufficient housing. By its nature a Special Housing Area should be "special" and allow projects to cut through the restrictions of the PODP and other inhibiting processes.

Para 5 of the draft policy notes that HASHAA achieves its purpose "by providing an alternative and 'fast track' means of creating zoned residential land, known as Special Housing Areas, as compared to the standard track process under the Resource Management Act". With this in mind, there is a concern that the draft policy does not succeed on its own terms, because the process it outlines is not a "fast-track".

F & G: We agree with the Property Council in that the draft policy emphasises, perhaps unintentionally, brownfield development rather than greenfield through its insistence on connection to infrastructure or placing the entire cost burden on the developer. It is doubtful that any developer would have the funding mechanism available to them to fund such cost and still achieve any degree of affordability in the subsequent development.

The policy has a similar effect on non-residential land rezoning by placing burden on the developer to establish impact of reduction in employment land.

**Do you have any suggested additional principles you think should be added?****Policy Outcomes & Selection Process**

*Section 15 of the proposed policy lists the intended outcomes that Council will seek to achieve by implementing the proposed Housing Accord Policy. Sections 16 to 25 of the proposed policy sets out how Council is proposing to call for and process SHA applications.*

**Do you agree with the proposed policy outcomes?**

No

**Please tick any of the outcomes below that you DO NOT agree with.** *Please select all that apply*

D- Ensure SHAs are generally consistent with and have regard to the relevant provisions of the PODP.

**Please explain why you don't agree with the outcomes above, or provide an alternative to the proposed outcome.** *(Please reference A. B.C. etc)*

One of the reasons for enacting the HASHAA and establishing SHAs is that the standard planning and approval process has fallen short of enabling sufficient affordable housing. By its nature a Special Housing Area should be "special" and allow projects to cut through the restrictions of the PODP.

**Do you have any suggested additional outcomes you think should be added?****Do you agree with the proposed process regarding the selection of SHAs?**

No

**Please explain why you agree/disagree.**

The consideration process for declaring a SHA under the current policy is limiting in that it is protracted, one sided and provides little surety of success. The policy front loads all the cost of developing a proposal on the development community with council introducing multiple internal approval steps including signoff by the elected members prior to being presented to the minister. Habitat suggests a partnership process with council committing to a proposal early and with far fewer hurdles is required to encourage engagement with the sector.

Paras 102-108 refer to immediacy of qualifying timeframes. While we acknowledge the principal of bringing developments to market in a timely manner and also avoiding land banking, Habitat believes these timeframes are too tight and should be pushed out to 24 months.

Paragraph 16 of the draft Policy indicates that developers will not be able to seek an area to be declared an SHA but that the Council will call for proposals from time to time. This approach is very restrictive and not at all proactive in terms of enhancing housing affordability. A mechanism whereby developers could approach council in a proactive manner is called for.

**Evaluation Framework**

*The Housing Accord and Special Housing Areas Act 2013 (HASHA Act) prescribes a number of mandatory selection criteria for housing developments within SHAs. Council has the option to set more criteria to guide the selection of SHA in Hamilton.*

*In Schedule 1 of the proposed policy, Council is proposing 4 additional criteria which are:*

*121. Location*

*122. Affordability*

*123. Required minimum number of dwellings*

*124. Determining which residential development rules will apply to SHA development*

**Schedule 2 of the proposed policy lists areas that ARE NOT suitable for the establishment of SHA's.**

**Please tick any of the areas below that you think should not be included in Schedule 2.** *Please select all that apply*

A- All Special Character Zones (excluding Peacock Terrace Area)

**Please explain why you think the areas indicated above are suitable for SHA.**

We agree with Waikato Tainui in that this exclusion is inappropriate and fails to recognise that there may be development sites located within Special Character Areas that fit all of the other requirements for a SHA, and with further consideration are also appropriate under the provisions of that Special Character Area.

Our submission is that Schedule 2 – Areas not suitable for the establishment of SHAs, be amended to remove reference to All Special Character Zones and that the requirements of section A11 in Schedule 1 be amended to ensure that the relevant performance standards and assessment criteria in any Special Character Area can be met by the SHA proposal.

**Section A6 of the proposed policy requires that SHA's provide a proportion of affordable dwelling, largely determined by the type and size of the dwellings and sections. Do you agree this criteria will enable the supply of comparatively affordable houses? Please select only one item**

Yes

**Please explain why you agree/disagree.**

Habitat agrees that any development inside a SHA should include 20% affordable homes. We understand that the mechanism used by council in the draft policy is an attempt to reduce the complexity of enforcing such but believe that the size and type limits are overly generous and will not achieve true affordability.

Habitat currently builds affordable 4 bedroom homes of circa 110m<sup>2</sup>. We suggest the policy is silent on the number of bedrooms allowing for flexibility and response to demand. Ministry of Social development is currently calling for 1 & 2 bedroom units however there is wider demand from first home buyers for entry level family homes of 3 & 4 bedroom configuration.

Habitat submits that the size limitation be reduced to 130M<sup>2</sup>, specificity of bedroom numbers be removed and further restrictive covenants, such as those that reduce the likelihood of starter homes across the wider subdivision, be limited within an SHA.

**Section A6 of the proposed policy also encourages collaborative schemes with Housing New Zealand and Registered SHPs and partnerships between the public and the private housing sectors. Do you agree that the policy should specifically encourage collaboration between social housing providers and private developers? Please select only one item**

Yes

**Please explain why you agree/disagree.**

Habitat agrees with the Property Council in that the private and the charitable sectors have important roles to play in improving housing affordability and housing supply, the Housing Accord even speaks of a “well-functioning private sector led housing market”.

Habitat has concerns about the nature of the sale mechanism of the affordable homes created within the SHA. The draft policy is silent on this process leaving it open to acquisition by speculators. Such concerns have been identified at other SHA areas where unscrupulous operators have been “gaming” of the system.

By working in collaboration with a SHP, developers could require a retained affordability element to be developed and enforced by a SHP who has both expertise and experience in that area. Council could create a mechanism for zoning land within an SHA for affordable purposes.

**Section A8 of the proposed policy proposed that SHA will be required to contain a minimum number of 10 dwellings. Do you agree with this criteria? Please select only one item**

No

**Please explain why you agree/disagree.**

Habitat supports the approach of distinguishing between a private developer and social housing development via a minimum development size. If the purpose of the SHA is to create affordability

through supply then this number for PHP's should be greater to encourage larger developments with the corresponding increase in supply to market.

Habitat submits that the minimum number of dwellings for a PHP provided SHA should be 50 giving rise to a minimum of 10 affordable homes.

**The minimum number of dwellings criteria will not apply to Housing New Zealand or registered Social Housing providers. Do you agree with this criteria?** *Please select only one item*

Yes

**Please explain why you agree/disagree.**

Habitat supports the approach of distinguishing between a private developer and social housing development via a minimum development size.

Social Housing providers often work at much smaller scale than those in the private development sector. A mechanism allowing smaller or even single sites to be designated as SHA is welcomed. In habitats case we have several existing sites that through residential rezoning would allow us to markedly increase the number of units provided for social purposes. The SHA process would allow this currently nonviable activity to come to fruition.

For PHP developments smaller than 50 units Council could consider a mechanism for zoning land for affordable purposes or require developers to work with SHP to ensure an affordability threshold is met within the development.

**The proposed policy proposes an approach (section A11) to determining which of the existing residential development rules in the Partly Operative District Plan will apply to SHAs. Do you agree with the approach in Section A11?** *Please select only one item*

No

**Please explain why you agree/disagree.**

As previously expressed the rules of the PODP have not resulted in increasing supply sufficiently to control affordability in the Hamilton housing market. In order to fast track supply as desired by the HASHA these rules should not take precedence.

**Do you have any other comments or feedback about any other aspects of the proposed Housing Accord policy?**

**Do you have any supporting documentation you would like to include?**

See attached.

## Hearings and Contact Information

**Do you wish to speak in support of your submission at a Council hearing?** *If you don't want to speak at the hearing, but would like staff to know who this submission is from, you are welcome to fill in the Contact Details section.*

Yes

**Are you responding as:** NGO, community group and/or social housing provider  
**What is your name?** Nic Greene  
**What is your organisation?** Habitat for Humanity (Central North Island) Ltd  
**Where do you live?**

I am a Hamilton City resident, my suburb is: Flagstaff

or

I live outside the Hamilton boundary, my Council District is:

# Hamilton Housing Accord

Consultation on Draft Special Housing Areas Policy

Submission

Habitat for Humanity (Central North Island)

DATE: 14 July 2017

PREPARED BY: Habitat for Humanity (Central North Island) General Manager Nic Greene

[nic.greene@habitat.org.nz](mailto:nic.greene@habitat.org.nz)

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## Executive summary

Habitat appreciates the Council's desire to engage with the social housing sector in relation to the establishment of SHAs and the draft Hamilton Special Housing Areas Policy (**draft Policy**).

Habitat for Humanity (Central North Island) Ltd (Habitat) the Housing Accord between Central Government and Hamilton City Council (**the Council**) and the establishment of special housing areas (**SHAs**) in Hamilton so as to enhance housing affordability.

The draft Policy risks operating in isolation as it places an overemphasis on the Partially Operative District Plan (**PODP**), at the expense of the HASHAA and is therefore overly restrictive and not enabling.

The Draft policy should retain the special nature of these areas by emphasising affordability as a key outcome. The policies guidance on affordability is unlikely to encourage the development of suitable lower cost housing.

The draft Policy does not provide the certainty and clarity developers/investors and social housing providers need – if adopted in its current form, there is unlikely to be a noticeable uptake of greenfield development or in areas not already zoned residential given the Council is unwilling to give equal priority to applications that do not meet the (zoning) requirements of the Partially Operative District Plan (PODP).

The draft Policy does nothing to aid with infrastructure and development costs, only refereeing in places to development agreements and alternative approaches respectively.



## About Habitat for Humanity

Habitat is a not-for-profit organisation that has the vision 'a world where everybody has a decent place to live'. It works to achieve this through the provision of affordable housing solutions within communities of need. Habitat for Humanity Central North Island has a philosophy of a 'hand up not a hand out' through all its work, and prescribes to the Six Dimensions of Housing Adequacy, a measure used by the New Zealand Government (Statistics New Zealand), and strongly referenced by the United Nations Human Rights Office of the High Commissioner.

## General comments

Habitat has had a longstanding relationship with and support from the Hamilton City Council and we value this relationship. We thank Council for its willingness to consult on the establishment of SHAs in Hamilton city and for the opportunity to make a submission on the draft Policy.

The purpose of the HASHAA is to enhance housing affordability by facilitating an increase in land and housing supply in regions or districts identified as having housing supply and affordability issues. Habitat supports the intent of the HASHAA, the Housing Accord between Central Government and the Council, as well as the establishment of SHAs in Hamilton in order to achieve increased affordability for its residents.

## Key concerns with the draft Policy

The draft Policy seeks to assist in the establishment of SHAs and enhance housing affordability. However, its current form is likely to significantly undermine that. Habitat submits that changes are needed to be made to the draft Policy, for the following reasons:

- The draft Policy is too restrictive and not enabling.
- Different processes are required in order for it to be effective.
- Housing affordability measures should be asserted.

## Key messages in the Habitat for Humanity CNI submission

### 1. Council should have a Housing Accord Policy

Habitat for Humanity (Central North Island) Ltd (Habitat) supports the Housing Accord between Central Government and Hamilton City Council (**the Council**) and the establishment of special housing areas (**SHAs**) in Hamilton so as to enhance housing affordability.

### 2. Ensuring the special nature of a Special Housing Area

We concur with the Property Council that the reasons for enacting the HASHAA and establishing SHAs is that the standard planning process has fallen short of enabling sufficient housing. By its nature a Special Housing Area should be “special” and allow projects to cut through the restrictions of the PODP. Para 5 of the draft policy notes that HASHAA achieves its purpose “by providing an alternative and ‘fast track’ means of creating zoned residential land, known as Special Housing Areas, as compared to the standard track process under the Resource Management Act”. With this in mind, there is a concern that the draft policy does not succeed on its own terms, because the process it outlines is not a “fast-track”.

### 3. Infrastructure cannot be entirely the developer’s responsibility

We agree with the Property Council in that the draft policy emphasises, perhaps unintentionally, brownfield development rather than greenfield through its insistence on connection to infrastructure or placing the entire cost burden on the developer. It is doubtful that any developer would have the funding mechanism available to them to fund such cost and still achieve any degree of affordability in the subsequent development.

The policy has a similar effect on non-residential land rezoning by placing burden on the developer to establish impact of reduction in employment land.

### 4. Cutting through the restrictions of the PODP

One of the reasons for enacting the HASHAA and establishing SHAs is that the standard planning process has fallen short of enabling sufficient housing. By its nature a Special Housing Area should be “special” and allow projects to cut through the restrictions of the PODP. Para 5 of the draft policy notes that HASHAA achieves its purpose “by providing an alternative and ‘fast track’ means of creating zoned residential land, known as Special Housing Areas, as compared to the standard track process under the Resource Management Act”. With this in mind, there is a concern that the draft policy does not succeed on its own terms, because the process it outlines is not a “fast-track”.

### 5. A partnership process with fewer hurdles would encourage sector engagement

The consideration process for declaring a SHA under the current policy is limiting in that it is protracted, one sided and provides little surety of success. The policy front loads all the cost of developing a proposal on the development community with council introducing multiple internal approval steps including signoff by the elected members prior to being presented to the minister. Habitat suggests a partnership process with far fewer hurdles is required to encourage engagement with the sector.

### 6. The qualifying timeframes are too tight

Paras 102-108 refer to immediacy of qualifying timeframes. While we acknowledge the principal of bringing developments to market in a timely manner and also avoiding land banking, Habitat believes these timeframes are too tight and should be pushed out to 24 months.

### 7. Developers must be able to suggest SHAs, this will help to enable housing affordability

Paragraph 16 of the draft Policy indicates that developers will not be able to seek an area to be declared an SHA but that the Council will call for proposals from time to time. This approach is very restrictive and

not at all proactive in terms of enhancing housing affordability. A mechanism whereby developers could approach council in a proactive manner is called for.

#### 8. Special character zones shouldn't be excluded from SHAs (but can still be preserved)

We agree with Waikato Tainui in that this exclusion is inappropriate and fails to recognise that there may be development sites located within Special Character Areas that fit all of the other requirements for a SHA, and with further consideration are also appropriate under the provisions of that Special Character Area.

Our submission is that Schedule 2 – Areas not suitable for the establishment of SHAs, be amended to remove reference to All Special Character Zones and that the requirements of section A11 in Schedule 1 be amended to ensure that the relevant performance standards and assessment criteria in any Special Character Area can be met by the SHA proposal.

#### 9. It is critical that a proportion of affordable dwellings in all SHAs is provided for

Habitat agrees that any development inside a SHA should include 20% affordable homes. We understand that the mechanism used by council in the draft policy is an attempt to reduce the complexity of enforcing such but believe that the size and type limits are overly generous and will not achieve true affordability.

Habitat currently builds affordable four-bedroom homes of circa 110m<sup>2</sup>. We suggest the policy is silent on the number of bedrooms allowing for flexibility and response to demand. Ministry of Social development is currently calling for one- and two-bedroom units however there is wider demand from first home buyers for entry level family homes of three- and four-bedroom configuration.

Habitat submits that the size limitation be reduced to 130M<sup>2</sup>, specificity of bedroom numbers be removed and further restrictive covenants, such as those that reduce the likelihood of starter homes across the wider subdivision, be limited within an SHA.

#### 10. Collaboration between SHPs and private developers should be encouraged

Habitat agrees with the Property Council in that the private and the charitable sectors have important roles to play in improving housing affordability and housing supply, the Housing Accord even speaks of a “well-functioning private sector led housing market”.

Habitat has concerns about the nature of the sale mechanism of the affordable homes created within the SHA. The draft policy is silent on this process leaving it open to acquisition by speculators. Such concerns have been identified at other SHA areas where unscrupulous operators have been “gaming” of the system.

By working in collaboration with a SHP, developers could require a retained affordability element to be developed and enforced by a SHP who has both expertise and experience in that area. Council could create a mechanism for zoning land within an SHA for affordable purposes.

#### 11. The minimum number of dwellings for a PHP should be 50

The draft policy calls for a minimum number of dwellings of 10 for a PHP. Habitat supports the approach of distinguishing between a private developer and social housing development via a minimum development size. If the purpose of the SHA is to create affordability through supply then this number should be greater (50+) to encourage larger developments with the corresponding increase in supply to market.

#### 12. Distinguish between private and social housing development

Habitat supports the approach of distinguishing between a private developer and social housing development via a minimum development size. For developments smaller than 50 units Council could

consider a mechanism for zoning land for affordable purposes or require developers to work with SHP to ensure an affordability threshold is met within the development.

Social Housing providers often work at much smaller scale than those in the private development sector. A mechanism allowing smaller or even single sites to be designated as SHA is welcomed. In Habitats case we have several existing sites that through residential rezoning would allow us to markedly increase the number of units provided for social purposes. The SHA process would allow this currently nonviable activity to come to fruition.

### 13. PODP rules have not been effective and should not take precedence

As previously expressed the rules of the PODP have not resulted in increasing supply sufficiently to control affordability in the Hamilton housing market. In order to fast track supply as desired by the HASHA these rules should not take precedence.

## Proposed Housing Accord Policy

**Please explain why you think Council should/should not have a Housing Accord Policy?**

See attached.

### Hearings and Contact Information

**Do you wish to speak in support of your submission at a Council hearing?** *If you don't want to speak at the hearing, but would like staff to know who this submission is from, you are welcome to fill in the Contact Details section.*

Yes

**Are you responding as:** Other Harrowfield Community Ratepayers Association Inc

**What is your name?** Bryan Bang

**What is your organisation?**

**Where do you live?**

I am a Hamilton City resident, my suburb is: Harrowfield

or

I live outside the Hamilton boundary, my Council District is:

TO THE HAMILTON CITY COUNCIL

Re: **SPECIAL HOUSING AREAS.**

This submission is made on behalf of the Harrowfield Community Ratepayers Association, Inc., (the Association).

This Association thanks the Hamilton City Council for the opportunity to make submissions on this matter and commends the Council both for allowing submissions in this manner and for introducing the provision to be included in the District Plan. It is pleasing to the Association to see the Council responding to the Government's policy for greater emphasis on new housing initiatives and for the positive manner in which it has responded.

The Association, however, wishes to make a submission on the policy with a view to ensuring that the integrity of existing housing areas is not compromised by the policy. We believe that a careful approach to the resolution of housing problems will do much to enhance the city's existing housing stock and the amenity values of the varied housing areas that have been built up over the years since development first took place in Hamilton.

We believe that the Council needs to take into account the following:

- Define the existing amenity values in areas where SHAs are proposed prior to their development and
- Ensure that lot sizes are appropriate for the development of complementary housing in areas where SHAs are to be permitted, and
- Ensure that existing infrastructure is capable of catering for extra development, and
- Ensure that SHA development are consented through the resource consent process, and
- Ensure that appropriate conditions are attached to resource consents for such areas -

and make appropriate provisions in its District Plan to ensure the integrity and amenity values of existing areas.

Amenity values means "those natural or physical qualities and characteristics of an area that contribute to people's appreciation of its pleasantness, aesthetic coherence, and cultural and recreational attributes". It is an ephemeral concept but one that we are enjoined by the Resource Management Act to take into account in the preparation and application of District Plans. It seems to the Association that the definition of amenity values would need to input of the populatuion of an area where an SHA was proposed. This could be done through the resource consent process or it could be carried out when areas for such developments are proposed. In any event the parties affected by such a proposal would need to be canvassed from a reasonable area surrounding the proposed SHA.

Site size. Crucial to the preservation of amenity values is the relationship between the area of land given over the each unit of housing and the building itself. The author of this submission carried out research on certain areas of Dunedin for his PhD thesis. It was found that where “sites” were small, social problems and overcrowding contributed to the development of the loss of minimal or basic amenity values and the deterioration of social values. The minimum site area was found to be an in the vicinity of 250m<sup>2</sup> which might accommodate a stand alone house, but such a building would of necessity be of minimum dimensions.

The Dunedin experience was that sites set aside for tents during the gold rushes of the 1860s and later developed for houses, led to what in popular parlance were called “slums”. While it is not suggested that this would be the inevitable outcome of the development of SHAs care must be taken to ensure that sites of appropriate size which are vital to the preservation of amenity values are provided in any SHA.

#### Infrastructure

Where an area has been developed to the density envisaged by the plan, it is probable that existing infrastructure could not cope with increased loads if further development were allowed. This must be a question that would need research and resolution through the consent process. Failure to do so could result in considerable cost to the Council in upgrading roading, water, and waste water services.

The Association would be happy to support the submission in person at the hearing.



Bryan Bang, MA, LL.B (Hons) PhD, MNZPI (Ret)  
Chairperson  
HCRA.

Address for Service:  
6 Harrowfired Drive  
Hamilton 3210  
By e-mail to: <bryanbang@xtra.co.nz>

## Proposed Housing Accord Policy

### Do you agree that Council should have a Housing Accord Policy?

No

### Please explain why you think Council should/should not have a Housing Accord Policy?

There's already too many rules and too much red tape that will restrict housing growth that is dramatically needed.

## Policy Principles

*Section 14 of the proposed policy lists the proposed principles that will be promoted by Council when implementing the Housing Accord Policy.*

### Do you agree with the proposed policy principles?

No

### Please tick any of the principles below that you DO NOT agree with. Please select all that apply

H- Development within SHAs will be consistent with the evaluation criteria and objectives set out in the schedules to this Policy. Priority will be given to establishing SHAs that are consistent with the strategic direction set within the Partly Operative District Plan ('PODP').

### Please explain why you don't agree with the principles above, or provide an alternative to the proposed principle. (Please reference A. B. C. etc)

The District plan provide enough red tape, and the special housing zone will further complicate the situation.

### Do you have any suggested additional principles you think should be added?

## Policy Outcomes & Selection Process

*Section 15 of the proposed policy lists the intended outcomes that Council will seek to achieve by implementing the proposed Housing Accord Policy. Sections 16 to 25 of the proposed policy sets out how Council is proposing to call for and process SHA applications.*

### Do you agree with the proposed policy outcomes?

No

### Please tick any of the outcomes below that you DO NOT agree with. Please select all that apply

D- Ensure SHAs are generally consistent with and have regard to the relevant provisions of the PODP.

### Please explain why you don't agree with the outcomes above, or provide an alternative to the proposed outcome. (Please reference A. B.C. etc)

### Do you have any suggested additional outcomes you think should be added?

### Do you agree with the proposed process regarding the selection of SHAs?

Not Answered

### Please explain why you agree/disagree.

## Evaluation Framework

*The Housing Accord and Special Housing Areas Act 2013 (HASHA Act) prescribes a number of mandatory selection criteria for housing developments within SHAs. Council has the option to set more criteria to guide the selection of SHA in Hamilton.*



*In Schedule 1 of the proposed policy, Council is proposing 4 additional criteria which are:*

*125. Location*

*126. Affordability*

*127. Required minimum number of dwellings*

*128. Determining which residential development rules will apply to SHA development*

**Schedule 2 of the proposed policy lists areas that ARE NOT suitable for the establishment of SHA's. Please tick any of the areas below that you think should not be included in Schedule 2. *Please select all that apply***

**Please explain why you think the areas indicated above are suitable for SHA.**

**Section A6 of the proposed policy requires that SHA's provide a proportion of affordable dwelling, largely determined by the type and size of the dwellings and sections. Do you agree this criteria will enable the supply of comparatively affordable houses? *Please select only one item***

No

**Please explain why you agree/disagree.**

The free market will provide a much better solution than the council/govt in terms of affordable housing.

**Section A6 of the proposed policy also encourages collaborative schemes with Housing New Zealand and Registered SHPs and partnerships between the public and the private housing sectors. Do you agree that the policy should specifically encourage collaboration between social housing providers and private developers? *Please select only one item***

Yes

**Please explain why you agree/disagree.**

**Section A8 of the proposed policy proposed that SHA will be required to contain a minimum number of 10 dwellings. Do you agree with this criteria? *Please select only one item***

Yes

**Please explain why you agree/disagree.**

**The minimum number of dwellings criteria will not apply to Housing New Zealand or registered Social Housing providers. Do you agree with this criteria? *Please select only one item***

No

**Please explain why you agree/disagree.**

**The proposed policy proposes an approach (section A11) to determining which of the existing residential development rules in the Partly Operative District Plan will apply to SHAs. Do you agree with the approach in Section A11? *Please select only one item***

No

**Please explain why you agree/disagree.**

**Do you have any other comments or feedback about any other aspects of the proposed Housing Accord policy?**

Council should consider providing for affordable housing by making it easier for affordable housing providers to meet their development objectives easier rather than requiring all developers to deliver a portion of smaller sized properties.

## Hearings and Contact Information

**Do you wish to speak in support of your submission at a Council hearing?** *If you don't want to speak at the hearing, but would like staff to know who this submission is from, you are welcome to fill in the Contact Details section.*

No

**Are you responding as:** Individual

**What is your name?** Matt Horsfield

**What is your organisation?**

**Where do you live?**

I am a Hamilton City resident, my suburb is: Silverdale

or

I live outside the Hamilton boundary, my Council District is:

## Proposed Housing Accord Policy

### Do you agree that Council should have a Housing Accord Policy?

Yes

### Please explain why you think Council should/should not have a Housing Accord Policy?

If there is a policy there should be some saving of costs.

## Policy Principles

*Section 14 of the proposed policy lists the proposed principles that will be promoted by Council when implementing the Housing Accord Policy.*

### Do you agree with the proposed policy principles?

No

**Please tick any of the principles below that you DO NOT agree with.** *Please select all that apply*

### Please explain why you don't agree with the principles above, or provide an alternative to the proposed principle. *(Please reference A. B. C. etc)*

H. The policy, in particular the schedules to the Policy, seems to assume that all housing will be traditional housing, with each dwelling on its own section, and normal roads, driveways, etc. I want the policy allow flexibility to include the types of developments seen in co-housing developments. Co-housing developments come in all shapes and sizes but common to them is a desire by the people in the co-housing development to include some common facilities which they share. This enables people to live happily and comfortably in smaller dwellings than normal, perhaps having a common building which can include a laundry, a workshop and a large kitchen and dining room, and perhaps a suite where residents' guests can stay (if their dwelling is too small for guests). Garages and carports are kept on the edges of the land, which results in more land for paths, common gardens, playing areas and so on. The people see each other passing along the paths and a sense of a friendly neighbourhood and co-operation with one another grows. Although the dwellings are close to one another, or perhaps terraced, or apartments on top of one another, or a mixture of types, careful design enables plenty of privacy when it is wanted by residents and on the other hand encourages communication and socialising. Co-housing allows for more dwellings on any size piece of land, and hence allows for affordable housing for a greater number of people. The social co-operation of the residents encourages resilience and stability among the residents.

### Do you have any suggested additional principles you think should be added?

I think a principle of environmentally-sustainable housing needs to be added.

Examples of what I mean are as follows:

If buildings have features of passive solar heating the residents will have smaller energy bills. If there were enough such dwellings though out NZ this would mean the nation as a whole would not need new electricity generation plants so soon. If houses are warmer through passive solar heating, the people will be healthier, with fewer admissions to hospital in the winter.

If the land of a subdivision is not substantially covered in paved driveways and roads then there will be far less run-off and hence less waste water running into drains.

Living in smaller dwellings would mean there is more land available for growing fruit and vegetables, which would result in healthier people.

## Policy Outcomes & Selection Process

*Section 15 of the proposed policy lists the intended outcomes that Council will seek to achieve by implementing the proposed Housing Accord Policy. Sections 16 to 25 of the proposed policy sets out how Council is proposing to call for and process SHA applications.*

### Do you agree with the proposed policy outcomes?

Not Answered

**Please tick any of the outcomes below that you DO NOT agree with.** *Please select all that apply*

**Please explain why you don't agree with the outcomes above, or provide an alternative to the proposed outcome.** *(Please reference A. B.C. etc)*

**Do you have any suggested additional outcomes you think should be added?**

**Do you agree with the proposed process regarding the selection of SHAs?**

Not Answered

**Please explain why you agree/disagree.**

## Evaluation Framework

*The Housing Accord and Special Housing Areas Act 2013 (HASHA Act) prescribes a number of mandatory selection criteria for housing developments within SHAs. Council has the option to set more criteria to guide the selection of SHA in Hamilton.*

*In Schedule 1 of the proposed policy, Council is proposing 4 additional criteria which are:*

*129. Location*

*130. Affordability*

*131. Required minimum number of dwellings*

*132. Determining which residential development rules will apply to SHA development*

**Schedule 2 of the proposed policy lists areas that ARE NOT suitable for the establishment of SHA's. Please tick any of the areas below that you think should not be included in Schedule 2.** *Please select all that apply*

**Please explain why you think the areas indicated above are suitable for SHA.**

**Section A6 of the proposed policy requires that SHA's provide a proportion of affordable dwelling, largely determined by the type and size of the dwellings and sections. Do you agree this criteria will enable the supply of comparatively affordable houses?** *Please select only one item*

No

**Please explain why you agree/disagree.**

I don't think that two bedrooms should be the minimum number of bedrooms in a dwelling. Many people live alone and one-bedroom would be all they would require or could afford.

**Section A6 of the proposed policy also encourages collaborative schemes with Housing New Zealand and Registered SHPs and partnerships between the public and the private housing sectors. Do you agree that the policy should specifically encourage collaboration between social housing providers and private developers?** *Please select only one item*

Not Answered

**Please explain why you agree/disagree.**

**Section A8 of the proposed policy proposed that SHA will be required to contain a minimum number of 10 dwellings. Do you agree with this criteria?** *Please select only one item*

Not Answered

**Please explain why you agree/disagree.**

**The minimum number of dwellings criteria will not apply to Housing New Zealand or registered Social Housing providers. Do you agree with this criteria?** *Please select only one item*

**Please explain why you agree/disagree.**

**The proposed policy proposes an approach (section A11) to determining which of the existing residential development rules in the Partly Operative District Plan will apply to SHAs. Do you agree with the approach in Section A11?** *Please select only one item*

**Please explain why you agree/disagree.**

**Do you have any other comments or feedback about any other aspects of the proposed Housing Accord policy?**

### Hearings and Contact Information

**Do you wish to speak in support of your submission at a Council hearing?** *If you don't want to speak at the hearing, but would like staff to know who this submission is from, you are welcome to fill in the Contact Details section.*

Yes

**Are you responding as:** Individual

**What is your name?** Alison Ringer

**What is your organisation?**

**Where do you live?**

I am a Hamilton City resident, my suburb is: Fairfield

or

I live outside the Hamilton boundary, my Council District is:

## Proposed Housing Accord Policy

**Do you agree that Council should have a Housing Accord Policy?**

Yes

**Please explain why you think Council should/should not have a Housing Accord Policy?**

Find letter attached

### Policy Principles

*Section 14 of the proposed policy lists the proposed principles that will be promoted by Council when implementing the Housing Accord Policy.*

**Do you agree with the proposed policy principles?**

No

**Please tick any of the principles below that you DO NOT agree with.** *Please select all that apply*

**Please explain why you don't agree with the principles above, or provide an alternative to the proposed principle.** *(Please reference A. B. C. etc)*

**Do you have any suggested additional principles you think should be added?**

### Policy Outcomes & Selection Process

*Section 15 of the proposed policy lists the intended outcomes that Council will seek to achieve by implementing the proposed Housing Accord Policy. Sections 16 to 25 of the proposed policy sets out how Council is proposing to call for and process SHA applications.*

**Do you agree with the proposed policy outcomes?**

No

**Please tick any of the outcomes below that you DO NOT agree with.** *Please select all that apply*

**Please explain why you don't agree with the outcomes above, or provide an alternative to the proposed outcome.** *(Please reference A. B.C. etc)*

**Do you have any suggested additional outcomes you think should be added?**

**Do you agree with the proposed process regarding the selection of SHAs?**

Not Answered

**Please explain why you agree/disagree.**

### Evaluation Framework

*The Housing Accord and Special Housing Areas Act 2013 (HASHA Act) prescribes a number of mandatory selection criteria for housing developments within SHAs. Council has the option to set more criteria to guide the selection of SHA in Hamilton.*

*In Schedule 1 of the proposed policy, Council is proposing 4 additional criteria which are:*

*133. Location*

*134. Affordability*

*135. Required minimum number of dwellings*

*136. Determining which residential development rules will apply to SHA development*

**Schedule 2 of the proposed policy lists areas that ARE NOT suitable for the establishment of SHA's.**

**Please tick any of the areas below that you think should not be included in Schedule 2.** *Please select all that apply*

**Please explain why you think the areas indicated above are suitable for SHA.**

**Section A6 of the proposed policy requires that SHA's provide a proportion of affordable dwelling, largely determined by the type and size of the dwellings and sections. Do you agree this criteria will enable the supply of comparatively affordable houses?** *Please select only one item*

**Please explain why you agree/disagree.**

**Section A6 of the proposed policy also encourages collaborative schemes with Housing New Zealand and Registered SHPs and partnerships between the public and the private housing sectors. Do you agree that the policy should specifically encourage collaboration between social housing providers and private developers?** *Please select only one item*

Not Answered

**Please explain why you agree/disagree.**

**Section A8 of the proposed policy proposed that SHA will be required to contain a minimum number of 10 dwellings. Do you agree with this criteria?** *Please select only one item*

Not Answered

**Please explain why you agree/disagree.**

**The minimum number of dwellings criteria will not apply to Housing New Zealand or registered Social Housing providers. Do you agree with this criteria?** *Please select only one item*

**Please explain why you agree/disagree.**

**The proposed policy proposes an approach (section A11) to determining which of the existing residential development rules in the Partly Operative District Plan will apply to SHAs. Do you agree with the approach in Section A11?** *Please select only one item*

**Please explain why you agree/disagree.**

**Do you have any other comments or feedback about any other aspects of the proposed Housing Accord policy?**

**Do you have any supporting documentation you would like to include?**

See attached.

## Hearings and Contact Information

**Do you wish to speak in support of your submission at a Council hearing?** *If you don't want to speak at the hearing, but would like staff to know who this submission is from, you are welcome to fill in the Contact Details section.*

Yes

**Are you responding as:** Business (developer, builder, consultant, planner, architect etc)  
**What is your name?** Individual to be determined  
**What is your organisation?** Perry Group  
**Where do you live?**

I am a Hamilton City resident, my suburb is: Whitiora

or

I live outside the Hamilton boundary, my Council District is:

14 July 2017

Hamilton City Council  
Special Housing Accord (SHA)  
**Attention: Luke O'Dwyer**

**RE: Draft Hamilton City SHA Policy Submission**

1. Perry Group Limited "Perrys" is one of the most successful privately-owned enterprises in the Waikato involved primarily in agricultural, manufacturing, importing and distribution, food and export, and the property industry sectors. It has been trading for over 60 years.
2. Perrys has also had a longstanding involvement in the community primarily through the Brian Perry Charitable Trust ( BPCT ).
3. Perrys has been a long standing supporter of Hamilton and the Waikato both commercially and charitably and continues to invest here. Involvement in some recent developments include;
  - River Terraces, Ngaruawahia – Residential development
  - (BP) Service Centre and Retail block, Horotiu - Service and Commercial Centre
  - Avantidrome, Cambridge – Cycling facility for the region
  - Sports Lodge, Cambridge – New short stay accomodation development
  - Te Awa Cycleway – River ride adjacent to Waikato River
  - Various industrial and other commercial property holdings in and around the country.
4. Perrys have reviewed the draft Hamilton City SHA Policy and have the following comments.
5. Perrys believes the draft policy complicates a nationally understood process that was introduced to allow accelerated growth in housing supply and by default supporting amenities. This will likely add time and cost to a process that was meant to reduce.
6. HASHA 2013 makes no mention of additional criteria being developed by councils for the purpose of scheduling sites. While it is accepted that some councils have developed such policies, it is considered that the HCC Council staff draft policy is so extensive and prescriptive it is contrary to the Acts purpose.
7. Perrys submits that the HASHA 2013 criteria be reflective of the Acts purpose with the following:



- a. that adequate infrastructure to service qualifying developments in the proposed SHAs either exists or is likely to exist;
  - b. that there is evidence of demand to create qualifying developments in specific areas of the scheduled region or district; and
  - c. that there will be demand for residential housing in the proposed SHAs.
8. Perrys have reviewed the Councils SHA selection policy and compared it with other policies which have guided other councils with selection of SHA areas. The SHA criteria policy exceeds other Council policies and is vastly different to Wellington, Tauranga and Nelson approach. Auckland Council did adopt criteria of its own for the selection of SHAs, beyond those imposed by the Act. Auckland Council criteria included only:
    - a. That the SHA be “located inside the notified Rural Urban Boundary or an existing applicable zone”.
    - b. That “sufficient and appropriate infrastructure (physical and social) will be provided to support the development.”
    - c. That the SHA must be “compatible with Proposed Auckland Unitary Plan (PAUP) provisions” (this related to proposed consent conditions).
    - d. That the SHA must have “reasonable access to employment and essential services”.
    - e. That the SHA has a “motivated developer ready to go, and likely to achieve early consent activation and the intended yield of sites/dwellings within the accord period.”
    - f. That the proposed SHA contributes “to housing affordability either in terms of overall housing supply or pricing of the intended housing product.”
  9. We consider the current draft Hamilton City SHA policy is inconsistent with other SHA policies and the purpose of the Act.
  10. Hamilton is one of the last cities in the country to adopt the SHA and should benefit from the lessons of other councils. The Council should not have to suffer the extra cost of reinventing a process, successfully used in other regions.
  11. Perrys have significant concerns with the selection criteria being biased and limited towards land already zoned residential and elevation of district plan zoning and rules. This approach does not create “additional “residential land than that already identified in the District Plan, which does not meet the purpose of the HASHA Act.
  12. We consider that Council staff have elevated the HCC District Plan as a preferential criteria, along with requirements for irrelevant criteria such as definitions of “infrastructure” beyond that defined in the HASHA Act. Such matters are not intended to form part of a Housing Accord Policy and are a consent matter following land being identified as SHA status. Any non-statutory Council SHA selection policy should logically be limited to and align with what is to be set out in the Housing Accord.

13. In its current form, the draft policy will not lead to the outcomes meant to be agreed between Council and the Minister under a Housing Accord which is focussed on targets and deliverables of additional residential housing only. This is potentially and intended to be, unrelated to residential land already zoned under a District Plan.
14. Perrys wishes for the Council not to adopt current SHA policy criteria and to make the appropriate changes as reflected in this submission.
15. The focus for Council should be to encourage any landowners or developers through a package of policy incentives to prepare their land and build houses more quickly than has been the case to date.
16. The Council should also be committed to working collaboratively with the Waikato District Council and Waipa District Council should any areas for potential housing development be identified by either Council across territorial boundaries or be serviced by infrastructure from the other Council.

Yours faithfully



**Richard Coventry**  
**CHIEF EXECUTIVE OFFICER**  
PERRY GROUP LIMITED

## Proposed Housing Accord Policy

### Do you agree that Council should have a Housing Accord Policy?

Yes

### Please explain why you think Council should/should not have a Housing Accord Policy?

It would be wise to properly plan for new subdivisions and not just rely on developers to create the same old same old slums of the future blocks of apartments with no community features, no shared space and just boxes in lines along straight streets. This is a great opportunity to get things right.

## Policy Principles

*Section 14 of the proposed policy lists the proposed principles that will be promoted by Council when implementing the Housing Accord Policy.*

### Do you agree with the proposed policy principles?

Not Answered

### Please tick any of the principles below that you DO NOT agree with. Please select all that apply

I- Development within SHAs will occur as quickly as practicable.

### Please explain why you don't agree with the principles above, or provide an alternative to the proposed principle. (Please reference A. B. C. etc)

This needs serious thought and planning

### Do you have any suggested additional principles you think should be added?

Yes. Consider alternatives such as ecovillages, cohousing and similar

## Policy Outcomes & Selection Process

*Section 15 of the proposed policy lists the intended outcomes that Council will seek to achieve by implementing the proposed Housing Accord Policy.*

*Sections 16 to 25 of the proposed policy sets out how Council is proposing to call for and process SHA applications.*

### Do you agree with the proposed policy outcomes?

Not Answered

### Please tick any of the outcomes below that you DO NOT agree with. Please select all that apply

A- Create certainty in respect of Councils approach to Special Housing Areas (SHAs) which assists the development community in making investment decisions;

### Please explain why you don't agree with the outcomes above, or provide an alternative to the proposed outcome. (Please reference A. B.C. etc)

Rushing in without consideration, planning and thought can lead to disaster. Take time, consult, look at different models, get it right

### Do you have any suggested additional outcomes you think should be added?

Yes, develop housing that promotes communities and sustainable housing.

### Do you agree with the proposed process regarding the selection of SHAs?

Not Answered

### Please explain why you agree/disagree.

## Evaluation Framework

*The Housing Accord and Special Housing Areas Act 2013 (HASHA Act) prescribes a number of mandatory selection criteria for*

housing developments within SHAs. Council has the option to set more criteria to guide the selection of SHA in Hamilton.

In Schedule 1 of the proposed policy, Council is proposing 4 additional criteria which are:

137. Location

138. Affordability

139. Required minimum number of dwellings

140. Determining which residential development rules will apply to SHA development

**Schedule 2 of the proposed policy lists areas that ARE NOT suitable for the establishment of SHA's. Please tick any of the areas below that you think should not be included in Schedule 2. Please select all that apply**

A- All Special Character Zones (excluding Peacock Terrace Area)

B- All Recreational Zones

C- Significant Archaeological, Historic and Cultural Sites

E- Natural Hazard Areas

F- Special Heritage Areas

G- Special Natural Areas

**Please explain why you think the areas indicated above are suitable for SHA.**

**Section A6 of the proposed policy requires that SHA's provide a proportion of affordable dwelling, largely determined by the type and size of the dwellings and sections. Do you agree this criteria will enable the supply of comparatively affordable houses? Please select only one item**

No

**Please explain why you agree/disagree.**

Does not lead to community just portioning off bits for the poor

**Section A6 of the proposed policy also encourages collaborative schemes with Housing New Zealand and Registered SHPs and partnerships between the public and the private housing sectors. Do you agree that the policy should specifically encourage collaboration between social housing providers and private developers? Please select only one item**

Not Answered

**Please explain why you agree/disagree.**

**Section A8 of the proposed policy proposed that SHA will be required to contain a minimum number of 10 dwellings. Do you agree with this criteria? Please select only one item**

Yes

**Please explain why you agree/disagree.**

**The minimum number of dwellings criteria will not apply to Housing New Zealand or registered Social Housing providers. Do you agree with this criteria? Please select only one item**

Yes

**Please explain why you agree/disagree.**

**The proposed policy proposes an approach (section A11) to determining which of the existing residential development rules in the Partly Operative District Plan will apply to SHAs. Do you agree with the approach in Section A11? Please select only one item**

**Please explain why you agree/disagree.**

**Do you have any other comments or feedback about any other aspects of the proposed Housing Accord policy?**

## Hearings and Contact Information

**Do you wish to speak in support of your submission at a Council hearing?** *If you don't want to speak at the hearing, but would like staff to know who this submission is from, you are welcome to fill in the Contact Details section.*

Yes

**Are you responding as:** Individual

**What is your name?** Jane Landman

**What is your organisation?**

**Where do you live?**

I am a Hamilton City resident, my suburb is: Riverlea

or

I live outside the Hamilton boundary, my Council District is:

## Proposed Housing Accord Policy

### Do you agree that Council should have a Housing Accord Policy?

No

### Please explain why you think Council should/should not have a Housing Accord Policy?

Enough rules already.

## Policy Principles

*Section 14 of the proposed policy lists the proposed principles that will be promoted by Council when implementing the Housing Accord Policy.*

### Do you agree with the proposed policy principles?

No

### Please tick any of the principles below that you DO NOT agree with. Please select all that apply

A- Council will openly engage with the community on the identification of the potential areas in the City for consideration as Special Housing Area (SHAs).

B- Council will work with Waikato-Tainui to give effect to the co-management arrangements under the Joint Management Agreement in the context of SHAs and will consider effects on the unique tangata whenua relationships, values, aspirations, roles and responsibilities with respect to areas identified for consideration as an SHA.

H- Development within SHAs will be consistent with the evaluation criteria and objectives set out in the schedules to this Policy. Priority will be given to establishing SHAs that are consistent with the strategic direction set within the Partly Operative District Plan ('PODP').

### Please explain why you don't agree with the principles above, or provide an alternative to the proposed principle. (Please reference A. B. C. etc)

A & B: we need to get it done quickly - too much consultation could mean missing out on housing. H: We don't want PODP rules in SHA rules.

### Do you have any suggested additional principles you think should be added?

## Policy Outcomes & Selection Process

*Section 15 of the proposed policy lists the intended outcomes that Council will seek to achieve by implementing the proposed Housing Accord Policy. Sections 16 to 25 of the proposed policy sets out how Council is proposing to call for and process SHA applications.*

### Do you agree with the proposed policy outcomes?

No

### Please tick any of the outcomes below that you DO NOT agree with. Please select all that apply

D- Ensure SHAs are generally consistent with and have regard to the relevant provisions of the PODP.

### Please explain why you don't agree with the outcomes above, or provide an alternative to the proposed outcome. (Please reference A. B.C. etc)

We don't want PODP rules with SHA rules.

### Do you have any suggested additional outcomes you think should be added?

### Do you agree with the proposed process regarding the selection of SHAs?

No

**Please explain why you agree/disagree.**

Developers should come to council with land, not council proposing land

**Evaluation Framework**

*The Housing Accord and Special Housing Areas Act 2013 (HASHA Act) prescribes a number of mandatory selection criteria for housing developments within SHAs. Council has the option to set more criteria to guide the selection of SHA in Hamilton.*

*In Schedule 1 of the proposed policy, Council is proposing 4 additional criteria which are:*

*141. Location*

*142. Affordability*

*143. Required minimum number of dwellings*

*144. Determining which residential development rules will apply to SHA development*

**Schedule 2 of the proposed policy lists areas that ARE NOT suitable for the establishment of SHA's.**

**Please tick any of the areas below that you think should not be included in Schedule 2.** *Please select all that apply*

**Please explain why you think the areas indicated above are suitable for SHA.**

**Section A6 of the proposed policy requires that SHA's provide a proportion of affordable dwelling, largely determined by the type and size of the dwellings and sections. Do you agree this criteria will enable the supply of comparatively affordable houses?** *Please select only one item*

No

**Please explain why you agree/disagree.**

Private enterprise and market forces in a general oversupply of land will drop the price. Council shouldn't try and regulate to get a lower price.

**Section A6 of the proposed policy also encourages collaborative schemes with Housing New Zealand and Registered SHPs and partnerships between the public and the private housing sectors. Do you agree that the policy should specifically encourage collaboration between social housing providers and private developers?** *Please select only one item*

Yes

**Please explain why you agree/disagree.**

**Section A8 of the proposed policy proposed that SHA will be required to contain a minimum number of 10 dwellings. Do you agree with this criteria?** *Please select only one item*

Yes

**Please explain why you agree/disagree.**

**The minimum number of dwellings criteria will not apply to Housing New Zealand or registered Social Housing providers. Do you agree with this criteria?** *Please select only one item*

Yes

**Please explain why you agree/disagree.**

**The proposed policy proposes an approach (section A11) to determining which of the existing residential development rules in the Partly Operative District Plan will apply to SHAs. Do you agree with the approach in Section A11?** *Please select only one item*

No

**Please explain why you agree/disagree.**

We don't want the proposed PODP restricting the ability to put houses onto the market

**Do you have any other comments or feedback about any other aspects of the proposed Housing Accord policy?**

**Do you have any supporting documentation you would like to include?**

See attached

### Hearings and Contact Information

**Do you wish to speak in support of your submission at a Council hearing?** *If you don't want to speak at the hearing, but would like staff to know who this submission is from, you are welcome to fill in the Contact Details section.*

No

**Are you responding as:** Individual

**What is your name?** Jody Arnott

**What is your organisation?**

**Where do you live?**

I am a Hamilton City resident, my suburb is: Hamilton East

or

I live outside the Hamilton boundary, my Council District is:



**Submission:** *Special Housing Area's Policy*

We submit against the Special Housing Area policy in favour of no policy being implemented by Hamilton City Council (HCC).

**Grounds to form a policy:**

The Housing Accord and Special Housing Area's Act (the Act) does not require the HCC to create a policy

The Hamilton Housing Accord (the Accord) differs from those signed by Tauranga and Queenstown councils. The Hamilton accord does not require the HCC to form a policy

**Rationale:**

Section 4 of the Act states the purpose and intent of the act "*enhance housing affordability by facilitating an increase in land and housing supply*".

The HCC intent should also be increasing land availability for housing; any requirements introduced by HCC that restricts land from being considered for a Special Housing Area (SHA) or restricts the development of sections within an SHA would be contravening the intent of act.

Section 16 (3) of the act provide the guidelines that the minister must consider before approving a special housing area and no reference is made to other factors being part of consideration process. We would conclude that HCC is also limited to considering the factors outlined in Section 16 (3)

Section 16 (2) should be taken in consideration of amended section (4A) which is just highlighting the need to have clear common sense boundaries of an SHA for the purpose of clarity and avoidance of doubt.

We also want to highlight the extent of the elected wing's involvement within the process. The elected wing decides if it will recommend a proposal to the minister to form an SHA, the actual operation consideration is via resource consent application. The act specifies the resource consent process for SHAs and the priority of considerations in section 34(1)

We propose that the act is prescriptive enough to allow sufficient protection through the resource consent process, while promoting growth to open up more land for housing.

Any HCC policy that is more restrictive than the Act contravenes the purpose of the act. Council and councillors reserve the right for a developer to prove how a proposed SHA will improve affordability and vote accordingly on the evidence provided weather a proposed SHA should be recommended to council. Being prescriptive with affordability does not allow private enterprise flexibility to find ways to support innovative affordable housing.

**Recommendation:**

We recommend that council does not implement a policy and guidance be taken from the act.

## Proposed Housing Accord Policy

### Do you agree that Council should have a Housing Accord Policy?

Yes

### Please explain why you think Council should/should not have a Housing Accord Policy?

As the district plan is very restrictive and does not allow for social housing and affordable housing

## Policy Principles

*Section 14 of the proposed policy lists the proposed principles that will be promoted by Council when implementing the Housing Accord Policy.*

### Do you agree with the proposed policy principles?

Yes

### Please tick any of the principles below that you DO NOT agree with. Please select all that apply

- A- Council will openly engage with the community on the identification of the potential areas in the City for consideration as Special Housing Area (SHAs).
- B- Council will work with Waikato-Tainui to give effect to the co-management arrangements under the Joint Management Agreement in the context of SHAs and will consider effects on the unique tangata whenua relationships, values, aspirations, roles and responsibilities with respect to areas identified for consideration as an SHA.
- E- Council will enable land within SHAs to be used to deliver a range of housing types to the market at different price points in order to achieve the purpose of HASHAA.
- F- SHAs must be serviced by and integrated with Council's strategic infrastructure networks.
- G- Where Council's strategic infrastructure networks are unavailable to an SHA for any reason, including but not limited to lack of network capacity or connectivity, all necessary infrastructure will be provided and funded by the developer at no cost to Council.
- H- Development within SHAs will be consistent with the evaluation criteria and objectives set out in the schedules to this Policy. Priority will be given to establishing SHAs that are consistent with the strategic direction set within the Partly Operative District Plan ('PODP').
- J- Development of SHAs will achieve high quality urban design outcomes.

### Please explain why you don't agree with the principles above, or provide an alternative to the proposed principle. (Please reference A. B. C. etc)

Don't agree as they do not identify solutions to affordable and social housing

Also this SHA needs to run independent as a process

### Do you have any suggested additional principles you think should be added?

All zones can become SHA

## Policy Outcomes & Selection Process

*Section 15 of the proposed policy lists the intended outcomes that Council will seek to achieve by implementing the proposed Housing Accord Policy. Sections 16 to 25 of the proposed policy sets out how Council is proposing to call for and process SHA applications.*

### Do you agree with the proposed policy outcomes?

Yes

### Please tick any of the outcomes below that you DO NOT agree with. Please select all that apply

- D- Ensure SHAs are generally consistent with and have regard to the relevant provisions of the PODP.

**Please explain why you don't agree with the outcomes above, or provide an alternative to the proposed outcome.** *(Please reference A. B.C. etc)*

No district plan should be applied that's the main reason for a SHA

**Do you have any suggested additional outcomes you think should be added?**

**Do you agree with the proposed process regarding the selection of SHAs?**

Yes

**Please explain why you agree/disagree.**

Based on need

## Evaluation Framework

*The Housing Accord and Special Housing Areas Act 2013 (HASHA Act) prescribes a number of mandatory selection criteria for housing developments within SHAs. Council has the option to set more criteria to guide the selection of SHA in Hamilton.*

*In Schedule 1 of the proposed policy, Council is proposing 4 additional criteria which are:*

*145. Location*

*146. Affordability*

*147. Required minimum number of dwellings*

*148. Determining which residential development rules will apply to SHA development*

**Schedule 2 of the proposed policy lists areas that ARE NOT suitable for the establishment of SHA's.**

**Please tick any of the areas below that you think should not be included in Schedule 2.** *Please select all that apply*

A- All Special Character Zones (excluding Peacock Terrace Area)

B- All Recreational Zones

D- Electricity Transmission Corridors

H- Large Lot Residential Zone

**Please explain why you think the areas indicated above are suitable for SHA.**

Land is land and if it's available for development it should happen

**Section A6 of the proposed policy requires that SHA's provide a proportion of affordable dwelling, largely determined by the type and size of the dwellings and sections. Do you agree this criteria will enable the supply of comparatively affordable houses?** *Please select only one item*

No

**Please explain why you agree/disagree.**

Affordable is along this zone. But a price point promise will not work

**Section A6 of the proposed policy also encourages collaborative schemes with Housing New Zealand and Registered SHPs and partnerships between the public and the private housing sectors. Do you agree that the policy should specifically encourage collaboration between social housing providers and private developers?** *Please select only one item*

No

**Please explain why you agree/disagree.**

To much politics and delays

**Section A8 of the proposed policy proposed that SHA will be required to contain a minimum number of 10 dwellings. Do you agree with this criteria?** *Please select only one item*

Yes

**Please explain why you agree/disagree.**

Scale is required for special affordable housing

**The minimum number of dwellings criteria will not apply to Housing New Zealand or registered Social Housing providers. Do you agree with this criteria?** *Please select only one item*

Yes

**Please explain why you agree/disagree.**

They will not do below 10 developments often anyway

**The proposed policy proposes an approach (section A11) to determining which of the existing residential development rules in the Partly Operative District Plan will apply to SHAs. Do you agree with the approach in Section A11?** *Please select only one item*

No

**Please explain why you agree/disagree.**

No district plan

**Do you have any other comments or feedback about any other aspects of the proposed Housing Accord policy?**

### Hearings and Contact Information

**Do you wish to speak in support of your submission at a Council hearing?** *If you don't want to speak at the hearing, but would like staff to know who this submission is from, you are welcome to fill in the Contact Details section.*

No

**Are you responding as:** Business (developer, builder, consultant, planner, architect etc)

**What is your name?** Sanjil mistry

**What is your organisation?** Pragma

**Where do you live?**

I am a Hamilton City resident, my suburb is: Flagstaff

or

I live outside the Hamilton boundary, my Council District is:

## Proposed Housing Accord Policy

### Do you agree that Council should have a Housing Accord Policy?

Yes

### Please explain why you think Council should/should not have a Housing Accord Policy?

The government's special housing areas policy allows councils to change the rules to enable development without some of the rules that normally control them. This gives councils the opportunity to do things differently. By opening the policy to ideas from the public the Hamilton City Council has indicated its willingness to use this opportunity to ensure Hamilton's Special Housing Areas develop into the kind of area we all want to live in.

My ideas for desirable outcomes:

I would like to see Special Housing Areas create neighbourhoods that people feel a part of – that they feel is “their place”. This needs to be designed in to the development in an integrated holistic way. The criteria for achieving this should be widened to include goals for social, cultural, environment, ecology, sustainability, diversity. Criteria should be set and evaluated by result rather than by complying with rules.

Neighbourhoods should provide easy access to community facilities – educational, medical, social, recreational, environmental, employment - that can encompass a variety of lifestyles - where it is easy to gather with neighbours or wider groups - where diverse people of all ethnicities, faiths, occupations, and interests can interact in ways that foster the development of hubs of positive innovation - where it is easy to share resources, equipment, opinions.

Urban areas should be designed:

To foster the natural development of communities.

To protect and enhance to natural ecology and environment.

To incorporate naturally-occurring features to enhance biodiversity.

To make best use of resources particularly high-production soils.

For sustainability – e. g. using durable low-energy materials and sited to use passive solar heating

To work with nature – e. g. by collecting rainwater, and by incorporating wetlands into streams and stormwater systems.

To integrate economic enterprises with the neighbourhood in compatible ways.

To be sustainable and thrive long term they should be designed for people, not cars.

What factors encourage this?

Gathering places where people can encounter each other frequently, casually, informally, formally.

Where many people have easy access to facilities by foot, cycle, public transport, not just car.

All these happen best in medium-density developments where many people are within easy range of community facilities and commercial centres. Communities can form around hubs with transport centre/interchange, commercial centres, school, preschool, library, health centre, hall/theatre, playground, park, garden etc. Large areas of low-density private houses work against this.

Happily medium density is also more economic because the same number of people can be housed and catered for with fewer resources, so less infrastructure has to be provided, so less capital is tied up before it is paid for by the users. It is also better long term because it is designed from the start to provide for medium density, avoiding costly later infrastructure upgrades for the communities which develop. People in neighbourhoods with shared well-used and shared facilities look after them.

Ideally the design will have an average medium-high density with high density centred around transport

hubs, medium density around community facilities and private homes sited throughout where suitable.

Transport infrastructure should be designed to give access to groups of households with shared facilities and spaces not just individual houses. Vehicle access should be kept to the edge of shared spaces. It should enable efficient public transport routes and safe paths and cycleways directly accessing community facilities and commercial hubs, with safe interchanges with road traffic.

The best kind of housing development for encouraging the growth of communities is co-housing - where the site and common facilities and areas within it are shared with group of households. Shared resources means more resources can be used for the same cost and/or it is more affordable. To put it another way, the more facilities and resources that are shared the less needs to be incorporated in the private home component of the housing so it is more economic for the householders. The criteria for Housing Service Providers should encourage those who want to live in SHAs to join with developers to design co-housing to meet their shared goals – even for groups to find or become developers of their own co-housing project or neighbourhood. This is the best way to integrate all the desirable features.

Another way of helping people to design their own neighbourhoods is to use Community Land Trusts or Cooperatives. These are non-profit entities that hold ownership of the land so businesses and householders can be insulated from a fluctuating economy and land values. A trust or cooperative could also be used to hold high quality agricultural land for productive purposes such as community gardens or market gardening enterprises. These could incorporate homes for those involved where relevant. SHAs should avoid high class agricultural land unless it is part of such a development.

Specific parts of the Draft Housing Accord Policy that should be changed to provide better outcomes:

Hamilton Special Housing Areas Policy Background and Legislative Intent 2007-06-19.pdf

Background and Legislative Intent

8. “encouraging smaller section sizes and gross floor area standards.”

Individual houses on small sections with only motor vehicle access to community and commercial facilities do not achieve desirable results. Small sections should have access to shared community facilities, preferably as part of an integrated development.

Schedule 1

A3 Predominantly Residential

“A qualifying development within a proposed SHA will be predominantly residential and have the primary purpose of supplying dwellings to the market. Any non-residential activities should be ancillary to the residential development and negotiated with the Council including reserves and open space areas, and commercial or community activities before the recommendation for a SHA is made to the Minister for Building and Construction.”

The primary purpose should be to supply housing that becomes part of a desirable, sustainable neighbourhood.

A 6 Affordability.

“Council will require a certain proportion of qualifying developments to comprise small subdivision allotments and/or dwellings to deliver more affordable private housing.”

This is best achieved as part of an integrated development, preferably self-managed co-housing.

“e. The potential for a development to target specific housing need e.g. first home buyers, the rental

market or social housing;

f. A requirement that the PHP engages with the Housing New Zealand or a Registered SHP to explore options to provide social housing, and where appropriate, to provide an acceptable legal mechanism for dwellings to be retained as social housing (freehold or rental).

Section 1 A6 Affordability

g. The delivery of more community housing will be encouraged by promoting collaborative schemes with Housing New Zealand and Registered SHPs and partnerships between the public and the private housing sectors.

The Council is open to proposals that address affordable housing through other mechanisms that are consistent with the principles set out in section 8 of this policy but retains preference for the registered SHP involvement as per A6 f. above.

h. The potential for a PHP to spread or mix the type and size of sections and dwellings to be developed throughout the proposed SHA.”

This is too restrictive. The criteria should include and encourage co-housing, particularly self-managing co-housing.

A7 Building Height

The best height /density is human scale – max 3 stories. Higher buildings should be restricted to areas associated with transport hubs and commercial centres.

A11 Determination of Appropriate Residential Zone Provisions

“For sites zoned General Residential in the PODP, Council will support proposals for SHAs that seek medium density or intensified residential development where it can be demonstrated that the development can comply with the performance standards and can meet the assessment criteria for those respective operative zonings.”

Co-housing enables these criteria to be met while facilitating other desirable outcomes.

## Policy Principles

*Section 14 of the proposed policy lists the proposed principles that will be promoted by Council when implementing the Housing Accord Policy.*

### Do you agree with the proposed policy principles?

Not Answered

**Please tick any of the principles below that you DO NOT agree with.** *Please select all that apply*

C- Council will work collaboratively with private housing providers ('PHPs'), social housing providers ('SHPs') and the Government to increase housing supply and opportunities for affordable housing.

**Please explain why you don't agree with the principles above, or provide an alternative to the proposed principle.** *(Please reference A. B. C. etc)*

See above

Specific parts of the Draft Housing Accord Policy that should be changed to provide better outcomes:

**Do you have any suggested additional principles you think should be added?**

Ecologically and environmentally sound design should be able to be incorporated into developments - such as constructed and natural wetlands, rainwater capture, composting toilets, biogas generation, biodiversity projects, etc.

## Policy Outcomes & Selection Process

*Section 15 of the proposed policy lists the intended outcomes that Council will seek to achieve by implementing the proposed Housing Accord Policy. Sections 16 to 25 of the proposed policy sets out how Council is proposing to call for and process SHA applications.*

**Do you agree with the proposed policy outcomes?**

No

**Please tick any of the outcomes below that you DO NOT agree with.** *Please select all that apply*

C- The creation of SHAs that achieve the purpose and principles of this Policy.

**Please explain why you don't agree with the outcomes above, or provide an alternative to the proposed outcome.** *(Please reference A. B.C. etc)*

See above

Specific parts of the Draft Housing Accord Policy that should be changed to provide better outcomes:

Schedule 1

A3 Predominantly Residential

The primary purpose should be to supply housing that becomes part of a desirable, sustainable neighbourhood.

e.

f.

g.

h.

This is too restrictive. The criteria should include and encourage co-housing, particularly self-managing co-housing.

A7 Building Height

The best height /density is human scale – max 3 stories. Higher buildings should be restricted to areas associated with transport hubs and commercial centres.

**Do you have any suggested additional outcomes you think should be added?****Do you agree with the proposed process regarding the selection of SHAs?**

No

**Please explain why you agree/disagree.**

The criteria need to be widened to include the integration of social, ecological, environmental cultural outcomes to be included.

**Evaluation Framework***The Housing Accord and Special Housing Areas Act 2013 (HASHA Act) prescribes a number of mandatory selection criteria for housing developments within SHAs. Council has the option to set more criteria to guide the selection of SHA in Hamilton.**In Schedule 1 of the proposed policy, Council is proposing 4 additional criteria which are:**149. Location**150. Affordability**151. Required minimum number of dwellings**152. Determining which residential development rules will apply to SHA development***Schedule 2 of the proposed policy lists areas that ARE NOT suitable for the establishment of SHA's.****Please tick any of the areas below that you think should not be included in Schedule 2.** *Please select all that apply***Please explain why you think the areas indicated above are suitable for SHA.****Section A6 of the proposed policy requires that SHA's provide a proportion of affordable dwelling, largely determined by the type and size of the dwellings and sections. Do you agree this criteria will enable the supply of comparatively affordable houses?** *Please select only one item*

No



**Please explain why you agree/disagree.**

Development should be more holistic - encouraging sharing of resources, thus reducing the demand and cost.

**Section A6 of the proposed policy also encourages collaborative schemes with Housing New Zealand and Registered SHPs and partnerships between the public and the private housing sectors. Do you agree that the policy should specifically encourage collaboration between social housing providers and private developers?** *Please select only one item*

No

**Please explain why you agree/disagree.**

It should also provide for co-housing groups to collaborate with social housing providers and private developers, and to develop their own schemes.

**Section A8 of the proposed policy proposed that SHA will be required to contain a minimum number of 10 dwellings. Do you agree with this criteria?** *Please select only one item*

No

**Please explain why you agree/disagree.**

This is too rigid. It should allow developments that result in over-all medium density neighbourhoods of good character and diversity.

**The minimum number of dwellings criteria will not apply to Housing New Zealand or registered Social Housing providers. Do you agree with this criteria?** *Please select only one item*

Yes

**Please explain why you agree/disagree.**

As long as it results in a desirable outcome for the neighbourhood/district

**The proposed policy proposes an approach (section A11) to determining which of the existing residential development rules in the Partly Operative District Plan will apply to SHAs. Do you agree with the approach in Section A11?** *Please select only one item*

**Please explain why you agree/disagree.**

I haven't had time to study this

**Do you have any other comments or feedback about any other aspects of the proposed Housing Accord policy?**

Not at this stage. I expect to have some when I appear before the Council.

**Do you have any supporting documentation you would like to include?**

See attached.

## Hearings and Contact Information

**Do you wish to speak in support of your submission at a Council hearing?** *If you don't want to speak at the hearing, but would like staff to know who this submission is from, you are welcome to fill in the Contact Details section.*

Yes

**Are you responding as:**

Individual

**What is your name?**

Roderick Francis David Aldridge

**What is your organisation?**

**Where do you live?**

I am a Hamilton City resident, my suburb is: Silverdale

or

I live outside the Hamilton boundary, my Council District is:

## **Submission to the Hamilton Special Housing Area policy.**

Roderick F. D. Aldridge  
14/07/2017

My thanks to the Council for the opportunity to contribute my ideas for how this can best be achieved. I am making this submission as a citizen of Hamilton.

I wish to appear before the Council to support my submission.

The government's special housing areas policy allows councils to change the rules to enable development without some of the rules that normally control them. This gives councils the opportunity to do things differently. By opening the policy to ideas from the public the Hamilton City Council has indicated its willingness to use this opportunity to ensure Hamilton's Special Housing Areas develop into the kind of area we all want to live in.

### **My ideas for desirable outcomes:**

I would like to see Special Housing Areas create neighbourhoods that people feel a part of – that they feel is “their place”. This needs to be designed in to the development in an integrated holistic way.

The criteria for achieving this should be widened to include goals for social, cultural, environment, ecology, sustainability, diversity. Criteria should be set and evaluated by result rather than by complying with rules.

Neighbourhoods should provide easy access to community facilities – educational, medical, social, recreational, environmental, employment - that can encompass a variety of lifestyles - where it is easy to gather with neighbours or wider groups - where diverse people of all ethnicities, faiths, occupations, and interests can interact in ways that foster the development of hubs of positive innovation - where it is easy to share resources, equipment, opinions.

Urban areas should be designed:

- To foster the natural development of communities.
- To protect and enhance to natural ecology and environment.
- To incorporate naturally-occurring features to enhance biodiversity.
- To make best use of resources particularly high-production soils.
- For sustainability – e. g. using durable low-energy materials and sited to use passive solar heating
- To work with nature – e. g. by collecting rainwater, and by incorporating wetlands into streams and stormwater systems.
- To integrate economic enterprises with the neighbourhood in compatible ways.

To be sustainable and thrive long term they should be be designed for people, not cars.

### **What factors encourage this?**

Gathering places where people can encounter each other frequently, casually, informally, formally. Where many people have easy access to facilities by foot, cycle, public transport, not just car.

All these happen best in medium-density developments where many people are within easy range of community facilities and commercial centres. Communities can form around hubs with transport centre/interchange, commercial centres, school, preschool, library, health centre, hall/theatre,

playground, park, garden etc. Large areas of low-density private houses work against this.

Happily medium density is also more economic because the same number of people can be housed and catered for with fewer resources, so less infrastructure has to be provided, so less capital is tied up before it is paid for by the users. It is also better long term because it is designed from the start to provide for medium density, avoiding costly later infrastructure upgrades for the communities which develop. People in neighbourhoods with shared well-used and shared facilities look after them.

Ideally the design will have an average medium-high density with high density centred around transport hubs, medium density around community facilities and private homes sited throughout where suitable.

Transport infrastructure should be designed to give access to groups of households with shared facilities and spaces not just individual houses. Vehicle access should be kept to the edge of shared spaces. It should enable efficient public transport routes and safe paths and cycleways directly accessing community facilities and commercial hubs, with safe interchanges with road traffic.

The best kind of housing development for encouraging the growth of communities is co-housing - where the site and common facilities and areas within it are shared with group of households. Shared resources means more resources can be used for the same cost and/or it is more affordable. To put it another way, the more facilities and resources that are shared the less needs to be incorporated in the private home component of the housing so it is more economic for the householders.

The criteria for Housing Service Providers should encourage those who want to live in SHAs to join with developers to design co-housing to meet their shared goals – even for groups to find or become developers of their own co-housing project or neighbourhood. This is the best way to integrate all the desirable features.

Another way of helping people to design their own neighbourhoods is to use Community Land Trusts or Cooperatives. These are non-profit entities that hold ownership of the land so businesses and householders can be insulated from a fluctuating economy and land values.

A trust or cooperative could also be used to hold high quality agricultural land for productive purposes such as community gardens or market gardening enterprises. These could incorporate homes for those involved where relevant.

SHAs should avoid high class agricultural land unless it is part of such a development.

### **Specific parts of the Draft Housing Accord Policy that should be changed to provide better outcomes:**

Hamilton Special Housing Areas Policy Background and Legislative Intent 2007-06-19.pdf

#### **Background and Legislative Intent**

8. “encouraging smaller section sizes and gross floor area standards.”

Individual houses on small sections with only motor vehicle access to community and commercial facilities do not achieve desirable results. Small sections should have access to shared community facilities, preferably as part of an integrated development.

### **Schedule 1**

#### **A3 Predominantly Residential**

“A qualifying development within a proposed SHA will be predominantly residential and have the

primary purpose of supplying dwellings to the market. Any non-residential activities should be ancillary to the residential development and negotiated with the Council including reserves and open space areas, and commercial or community activities before the recommendation for a SHA is made to the Minister for Building and Construction.”

The primary purpose should be to supply housing that becomes part of a desirable, sustainable neighbourhood.

### **A 6 Affordability.**

“Council will require a certain proportion of qualifying developments to comprise small subdivision allotments and/or dwellings to deliver more affordable private housing.”

This is best achieved as part of an integrated development, preferably self-managed co-housing.

e. The potential for a development to target specific housing need e.g. first home buyers, the rental market or social housing;

f. A requirement that the PHP engages with the Housing New Zealand or a Registered SHP to explore options to provide social housing, and where appropriate, to provide an acceptable legal mechanism for dwellings to be retained as social housing (freehold or rental).

Section 1 A6 Affordability

g. The delivery of more community housing will be encouraged by promoting collaborative schemes with Housing New Zealand and Registered SHPs and partnerships between the public and the private housing sectors.

The Council is open to proposals that address affordable housing through other mechanisms that are consistent with the principles set out in section 8 of this policy but retains preference for the registered SHP involvement as per A6 f. above.

h. The potential for a PHP to spread or mix the type and size of sections and dwellings to be developed throughout the proposed SHA.”

This is too restrictive. The criteria should include and encourage co-housing, particularly self-managing co-housing.

### **A7 Building Height**

The best height /density is human scale – max 3 stories. Higher buildings should be restricted to areas associated with transport hubs and commercial centres.

### **A11 Determination of Appropriate Residential Zone Provisions**

“For sites zoned General Residential in the PODP, Council will support proposals for SHAs that seek

medium density or intensified residential development where it can be demonstrated that the development can comply with the performance standards and can meet the assessment criteria for those respective operative zonings.”

Co-housing enables these criteria to be met while facilitating other desirable outcomes.

Roderick F. D. Aldridge  
33A Barrie Crescent  
Hamilton 3216

## Proposed Housing Accord Policy

### Do you agree that Council should have a Housing Accord Policy?

Yes

### Please explain why you think Council should/should not have a Housing Accord Policy?

#### Policy Principles

*Section 14 of the proposed policy lists the proposed principles that will be promoted by Council when implementing the Housing Accord Policy.*

### Do you agree with the proposed policy principles?

No

#### Please tick any of the principles below that you DO NOT agree with. Please select all that apply

- C- Council will work collaboratively with private housing providers ('PHPs'), social housing providers ('SHPs') and the Government to increase housing supply and opportunities for affordable housing.
- D- Council will enable SHAs that achieve the purpose of HASHAA provided they do not compromise or undermine Council's existing or planned infrastructure, and is generally consistent with Council's strategic land use planning.
- F- SHAs must be serviced by and integrated with Council's strategic infrastructure networks.
- H- Development within SHAs will be consistent with the evaluation criteria and objectives set out in the schedules to this Policy. Priority will be given to establishing SHAs that are consistent with the strategic direction set within the Partly Operative District Plan ('PODP').
- I- Development within SHAs will occur as quickly as practicable.
- J- Development of SHAs will achieve high quality urban design outcomes.

#### Please explain why you don't agree with the principles above, or provide an alternative to the proposed principle. (Please reference A. B. C. etc)

The above principles are very narrowly focused and should be expanded to include more ecological, social, cultural, and economic criteria and outcomes.

C. As well as SHPs and PHPs Council should also be willing to work with established citizen groups (in trusts or other entities) who want to co-design and develop their own neighbourhoods to meet their individual and collective needs. Community land trusts should be established as an alternative model that will ensure true affordability.

D. It should be considered that sustainable and ecologically built communities will have less demand for traditional infrastructure by harnessing alternative energy sources for example and also would be able to supply some of their own infrastructure such as rainwater catchment and potentially also alternative systems for disposing of waste and black/grey water, which should be considered. Strategic land use can be expanded to include community gardens and even light economic activity such as cottage industries. Land zoned for agriculture can be formed into ecological land cooperatives to allow for many homesteads on a piece of agricultural land.

F. Alternative energy models would reduce the need for Council's infrastructure. Housing and communities should be designed for people and the transport infrastructure should support their interactions and not detract from them. We should look at roading design and create communities where roads and cars are kept to the peripheries of our communities and where walking and biking are promoted and the foot and bike paths are designed in a way that they will be utilised and are safe. Public transport should easily accessible and as sustainable as possible.

H. The criteria and outcomes laid out in this policy are way too narrow and should include more social, ecological and economic factors.

I. We are building homes and communities, not just houses and so there is a need to ensure extensive community-wide consultation is carried out and that good design that focuses on building sustainable communities is not sacrificed in order to build more houses quickly. What is built now will impact our landscape and our communities for many years to come so how we go about meeting our need for more housing needs to be carefully considered.

J. Urban design outcomes needs to be expanded to include natural building materials, alternative energy, community gardens, north-facing, and other factors. We need to expand these urban design outcomes to be more holistic.

**Do you have any suggested additional principles you think should be added?**

## Policy Outcomes & Selection Process

*Section 15 of the proposed policy lists the intended outcomes that Council will seek to achieve by implementing the proposed Housing Accord Policy. Sections 16 to 25 of the proposed policy sets out how Council is proposing to call for and process SHA applications.*

**Do you agree with the proposed policy outcomes?**

No

**Please tick any of the outcomes below that you DO NOT agree with.** *Please select all that apply*

**Please explain why you don't agree with the outcomes above, or provide an alternative to the proposed outcome.** *(Please reference A. B.C. etc)*

The criteria and housing outcomes for choosing housing developers and Special Housing Areas needs to be expanded to include social-cultural, ecological, and economic criteria & outcomes—not just how many houses per area of land or how big each dwelling.

Hamilton could harness this Housing Accord grant to become a model city of New Zealand for environmentally sustainable and socially responsible housing, neighbourhoods and community development

**Do you have any suggested additional outcomes you think should be added?**

Social/Cultural Outcomes

Most people wanting a home want not only a building in which to live but they want a neighbourhood, to feel a sense of belonging and connection, to feel they have a voice in what goes on in their neighbourhood, and to have opportunities to interact with the natural world around them. How we develop houses can either contribute to these human needs or detract from them. For instance, how houses are situated/oriented in relation to each other can offer privacy and autonomy while also giving a sense of belonging and inclusion.

If houses are built like commodities without a holistic approach, people can be left feeling isolated, disconnected, disempowered, and dysfunctional—and all of society and our taxes bear the costs of those negative social outcomes. If houses are designed correctly, communities can become more empowered and resilient to solve their own problems and meet their own needs.

Environmental Outcomes

We can significantly reduce the negative effects of climate change, environmental pollution, and loss of biodiversity through designing in what materials we build the houses with and how nature can be incorporated into the design. For instance, we need to consider how the houses can be built with low-embodied energy materials and how they are designed for maximum energy efficiency and passive solar heating. Residents can be more self-sufficient with energy, water, and food. For instance, house designs can include rainwater catchment systems, solar water heaters, and green spaces to absorb water, as food gardens, and as a habitat for biodiversity.

## Economic Outcomes

Neighbourhoods can be built in a way that enhances the economic opportunities for inhabitants such as where residents can have cottage industries to sell value-added products and services. Many intentional communities have training programmes as social enterprises or small businesses, teaching skills in sustainable living, alternative energy, maintenance, food growing and permaculture design, upcycling skills, etc. Residents can also save money if there are shared community resources and each household doesn't need to have one of every tool. The greatest savings is if the price of land is removed from the housing price—where the land is held by a non-profit Community Land Trust.

Special Areas Housing Criteria & outcomes should include:

- Sustainable Development Goals
- Permaculture Principles
- Outcomes laid out by the community members themselves
- Economic stability and opportunities for economic activity

### **Do you agree with the proposed process regarding the selection of SHAs?**

Not Answered

**Please explain why you agree/disagree.**

## Evaluation Framework

*The Housing Accord and Special Housing Areas Act 2013 (HASHA Act) prescribes a number of mandatory selection criteria for housing developments within SHAs. Council has the option to set more criteria to guide the selection of SHA in Hamilton.*

*In Schedule 1 of the proposed policy, Council is proposing 4 additional criteria which are:*

*153. Location*

*154. Affordability*

*155. Required minimum number of dwellings*

*156. Determining which residential development rules will apply to SHA development*

### **Schedule 2 of the proposed policy lists areas that ARE NOT suitable for the establishment of SHA's.**

**Please tick any of the areas below that you think should not be included in Schedule 2.** *Please select all that apply*

**Please explain why you think the areas indicated above are suitable for SHA.**

**Section A6 of the proposed policy requires that SHA's provide a proportion of affordable dwelling, largely determined by the type and size of the dwellings and sections. Do you agree this criteria will enable the supply of comparatively affordable houses?** *Please select only one item*

No

**Please explain why you agree/disagree.**

For housing to stay truly affordable, it needs to be situated on a Community Land Trust where the land is held by a non-profit entity for the purposes of stewarding the people and infrastructure on the land. Government can release land to be held in a community land trust in perpetuity for the purpose of keeping all housing and businesses on that land affordable and economically viable despite any housing or economic fluctuations.

**Section A6 of the proposed policy also encourages collaborative schemes with Housing New Zealand and Registered SHPs and partnerships between the public and the private housing sectors. Do you agree that the policy should specifically encourage collaboration between social housing providers and private developers?** *Please select only one item*

Not Answered

**Please explain why you agree/disagree.**

Yes there should be collaboration BUT Housing service providers needs to be expanded to include citizen groups who want to work with developers to co-design their own neighbourhoods.

Only two housing provider entities are mentioned in the policy statement

**Section A8 of the proposed policy proposed that SHA will be required to contain a minimum number of 10 dwellings. Do you agree with this criteria? Please select only one item**

Not Answered

**Please explain why you agree/disagree.****The minimum number of dwellings criteria will not apply to Housing New Zealand or registered Social Housing providers. Do you agree with this criteria? Please select only one item****Please explain why you agree/disagree.****The proposed policy proposes an approach (section A11) to determining which of the existing residential development rules in the Partly Operative District Plan will apply to SHAs. Do you agree with the approach in Section A11? Please select only one item****Please explain why you agree/disagree.****Do you have any other comments or feedback about any other aspects of the proposed Housing Accord policy?**

Consultation Process

The process by which communities are able to participate in this housing policy submission process needs to reach out to a greater diversity of people to understand their housing and community needs and visions.

I would suggest that we use the “innovative structured engagement” process as written in the Building Better Neighbourhoods” proposal (link provided below): The facilitation of a co-design process; with a focus on developing a project plan on how to introduce, raise awareness of, and bring into Hamilton more cooperative, ecological, and affordable housing options that meet the needs of an increasingly diverse population.

The population of Hamilton City is projected to increase by 36% over the period from 2013 to 2033. This is higher than the rate of growth for the Waikato region and New Zealand as a whole, both of which are predicted to increase by 26% over this period. Hamilton is also a resettlement community with increasing number of migrants choosing to live here. It is third after Auckland and Wellington for numbers of new migrants for the period March 2015 – March 2017.

The increasing cultural diversity brings many positives to the region in addition to demand for a greater variety of housing options. For example, new families from overseas can be multi-generational and have a desire for self-sustainability as well as a need for strong community support. These requirements can be met via appropriate housing design and development which build and enhance cultural connections. One aspect that must also be considered is around the possible rezoning of land to enable these new neighbourhoods to be developed.

This is the ideal time for key stakeholders to develop a plan to help develop neighbourhoods that make a difference in the quality and health of residents lives, thus meeting the needs of the communities they serve.



Creating healthy and happy diverse, vibrant, successful, affordable, environmentally sustainable communities!

More and more inter-disciplinary research is illustrating that our cities are increasingly faced with a crisis of social disconnection and how we design our urban spaces plays a key role in boosting social connection in communities.

There are so many examples around the world of housing developments and neighbourhoods that are successful at addressing the range of human needs of belonging and connection, are environmentally sustainable, and are affordable.

This is done through careful, collaborative, and participatory design processes. These communities are known by many names but they all share the ethics of earth care, people care & fair share, operate on sustainability principles, and include participatory decision making and co-design. These intentional communities are known as co-housing, pocket neighbourhoods, and ecovillages.

#### Co-Housing:

The common attributes of any co-housing community include:

- Co-developed, co-designed, and co-organized by residents.
- Extensive common facilities supporting daily life - particularly a common house
- Shared space to enable community interaction, and car-free.
- Resident managed.
- A decision making process free of hierarchy

Earthsong Eco-Neighbourhood in West Auckland is an established co-housing community since 2002. The main founder, Robin, is available to consult to groups, Councils, and communities on establishing co-housing in other areas in NZ. She recently presented to a group in Hamilton who are very keen to see this model happen in Hamilton.

#### Pocket Neighbourhoods:

These are clustered groups of neighbouring houses or apartments gathered around a shared open space — a garden courtyard, a pedestrian street, a series of joined backyards, or a reclaimed alley — all of which have a clear sense of territory and shared stewardship. They can be in urban, suburban or rural areas.

#### Ecovillages

The Eco-village movement in different parts of the world is an attempt to solve different problems from bottom up but in a holistic manner. An ecovillage is an intentional or traditional community using local participatory processes to holistically integrate ecological, economic, social, and cultural dimensions of sustainability in order to regenerate social and natural environments.

#### Ecological land Cooperatives

##### Converting agricultural land from pasture to Ecological Land Cooperatives

Agricultural land can be much better utilized for both agriculture and housing if it's formed into an ecological land cooperative where the homesteads on the land use the land for ecological-agricultural purposes. A piece of land that once served two purposes—to graze cattle and to support 1 farmer, serve dozens of purposes farming a great diversity of foods and products in a more environmentally sustainable way while providing housing and livelihoods for a number of families. A great example of this is the Ecological Land Cooperative in England.

#### References:

<https://thehappycity.com/resources/happy-homes/>

Sustainable Development Goals: <https://sustainabledevelopment.un.org/?menu=1300>

Permaculture Design Ethics and Principles: <https://en.wikipedia.org/wiki/Permaculture>

Initiative Homes: [initiativehomes.co.uk](http://initiativehomes.co.uk)

Nightingale: [nightingalehousing.org](http://nightingalehousing.org)

Co-Housing: <http://cohousing.org.nz/what-cohousing>

Ecovillages: <https://ecovillage.org/projects/what-is-an-ecovillage/>

Community Land Trust: [https://en.wikipedia.org/wiki/Community\\_land\\_trust](https://en.wikipedia.org/wiki/Community_land_trust)

Ecological Land Cooperative: [ecologicaland.coop](http://ecologicaland.coop)

Building Better Neighbourhoods Proposal:

[https://docs.google.com/document/d/1radk7xvR3F4E8BaRhDDA7ng5qZajvS\\_\\_eK3oONwQWE0/edit?usp=sharing](https://docs.google.com/document/d/1radk7xvR3F4E8BaRhDDA7ng5qZajvS__eK3oONwQWE0/edit?usp=sharing)

## Hearings and Contact Information

**Do you wish to speak in support of your submission at a Council hearing?** *If you don't want to speak at the hearing, but would like staff to know who this submission is from, you are welcome to fill in the Contact Details section.*

Yes

**Are you responding as:** Individual

**What is your name?** Linda Weijers

**What is your organisation?**

**Where do you live?**

I am a Hamilton City resident, my suburb is:

or

I live outside the Hamilton boundary, my Council District is: Waikato

## Proposed Housing Accord Policy

### Do you agree that Council should have a Housing Accord Policy?

Not Answered

### Please explain why you think Council should/should not have a Housing Accord Policy?

The Hamilton Central Business Association (HCBA) supports Council's decision to look at the creation of Special Housing Areas (SHA) in accordance with the provision of the Housing Accords and Special Housing Areas Act.

With a view to meeting the affordable housing needs of the city, continuing the growth plan and adding to the vibrancy and vitality of Hamilton, identifying SHA sites will positively contribute to this.

However, HCBA would like to ensure that when HCC assesses sites for SHA, that Garden Place is automatically exempt from consideration. Garden Place currently has two apartment buildings located on either side of the square that often have washing drying in full public view which does not positively enhance the image of this space. In addition, the buildings themselves are not maintained to a level that helps lift the look and feel of Garden Place.

HCBA does support apartment buildings and mixed use development of apartment living over retail sites in the CBD, however there needs to be minimum regulations put in place for these developments to have communal apartment space to support basic living needs away from public view e.g. washing lines and green space. Regulation also needs to be adhered to by tenants to ensure that washing is not dried in public view to ensure appropriate standards in the CBD.

Finally, in accordance with the hospitality precinct identified by the CCTP, HCBA would like to support the continued development of SHA in these areas.

## Policy Principles

*Section 14 of the proposed policy lists the proposed principles that will be promoted by Council when implementing the Housing Accord Policy.*

### Do you agree with the proposed policy principles?

Not Answered

**Please tick any of the principles below that you DO NOT agree with.** *Please select all that apply*

**Please explain why you don't agree with the principles above, or provide an alternative to the proposed principle.** *(Please reference A. B. C. etc)*

### Do you have any suggested additional principles you think should be added?

## Policy Outcomes & Selection Process

*Section 15 of the proposed policy lists the intended outcomes that Council will seek to achieve by implementing the proposed Housing Accord Policy. Sections 16 to 25 of the proposed policy sets out how Council is proposing to call for and process SHA applications.*

### Do you agree with the proposed policy outcomes?

Not Answered

**Please tick any of the outcomes below that you DO NOT agree with.** *Please select all that apply*

**Please explain why you don't agree with the outcomes above, or provide an alternative to the proposed outcome.** *(Please reference A. B.C. etc)*

**Do you have any suggested additional outcomes you think should be added?**

**Do you agree with the proposed process regarding the selection of SHAs?**

Not Answered

**Please explain why you agree/disagree.**

## Evaluation Framework

*The Housing Accord and Special Housing Areas Act 2013 (HASHA Act) prescribes a number of mandatory selection criteria for housing developments within SHAs. Council has the option to set more criteria to guide the selection of SHA in Hamilton.*

*In Schedule 1 of the proposed policy, Council is proposing 4 additional criteria which are:*

*157. Location*

*158. Affordability*

*159. Required minimum number of dwellings*

*160. Determining which residential development rules will apply to SHA development*

**Schedule 2 of the proposed policy lists areas that ARE NOT suitable for the establishment of SHA's.**

**Please tick any of the areas below that you think should not be included in Schedule 2.** *Please select all that apply*

**Please explain why you think the areas indicated above are suitable for SHA.**

**Section A6 of the proposed policy requires that SHA's provide a proportion of affordable dwelling, largely determined by the type and size of the dwellings and sections. Do you agree this criteria will enable the supply of comparatively affordable houses?** *Please select only one item*

**Please explain why you agree/disagree.**

**Section A6 of the proposed policy also encourages collaborative schemes with Housing New Zealand and Registered SHPs and partnerships between the public and the private housing sectors. Do you agree that the policy should specifically encourage collaboration between social housing providers and private developers?** *Please select only one item*

Not Answered

**Please explain why you agree/disagree.**

**Section A8 of the proposed policy proposed that SHA will be required to contain a minimum number of 10 dwellings. Do you agree with this criteria?** *Please select only one item*

Not Answered

**Please explain why you agree/disagree.**

**The minimum number of dwellings criteria will not apply to Housing New Zealand or registered Social Housing providers. Do you agree with this criteria?** *Please select only one item*

**Please explain why you agree/disagree.**

**The proposed policy proposes an approach (section A11) to determining which of the existing residential development rules in the Partly Operative District Plan will apply to SHAs. Do you agree with the approach in Section A11?** *Please select only one item*

**Please explain why you agree/disagree.**

**Do you have any other comments or feedback about any other aspects of the proposed Housing Accord policy?**

## Hearings and Contact Information

**Do you wish to speak in support of your submission at a Council hearing?** *If you don't want to speak at the hearing, but would like staff to know who this submission is from, you are welcome to fill in the Contact Details section.*

Not Answered

**Are you responding as:**

Not Answered

**What is your name?**

Vanessa Williams

**What is your organisation?**

Hamilton Central Business Association

**Where do you live?**

I am a Hamilton City resident, my suburb is:

or

I live outside the Hamilton boundary, my Council District is:

## Proposed Housing Accord Policy

### Do you have any supporting documentation you would like to include?

Submission attached.

### Hearings and Contact Information

**Do you wish to speak in support of your submission at a Council hearing?** *If you don't want to speak at the hearing, but would like staff to know who this submission is from, you are welcome to fill in the Contact Details section.*

Yes

**Are you responding as:**

Not Answered

**What is your name?**

Thomas Gibbons

**What is your organisation?**

Property Council New Zealand (Waikato Branch)

## Executive summary

- i. Property Council New Zealand (**Property Council**) supports the intent of the Housing Accords and Special Housing Areas Act 2013 (**the HASHAA**).
- ii. We support the Hamilton Housing Accord (**the Accord**) and the establishment of special housing areas (**SHAs**) in Hamilton so as to enhance housing affordability.
- iii. The purpose of the draft Hamilton Special Housing Areas Policy (**Policy**) can be summarised as being to provide guidance to Hamilton City Council (**Council**) and the development community in applying the HASHAA.
- iv. The draft Policy must ensure it does not introduce new requirements and/or alter requirements of the HASHAA.
- v. The draft Policy needs to be amended to better achieve the purpose of the HASHAA and the Accord.
- vi. The draft Policy's rigidity and overemphasis on the Partially Operative District Plan (**PODP**) risks undermining the HASHAA and the Accord, and thereby reducing the opportunity to enhance housing affordability.
- vii. The draft Policy does not provide the certainty and clarity developers/investors need – if adopted in its current form, there is unlikely to be a noticeable uptake of greenfield development or in areas not already zoned residential given the Council is unwilling to:
  - (a) provide infrastructure not already in its capital works programme
  - (b) give equal priority to applications that do not meet the (zoning) requirements of the PODP.

## 1. About Property Council

- 1.1 Property Council is a member-led, not-for-profit organisation that represents the country's commercial, industrial and retail property owners, managers, investors, and advisors. Our primary goal is the creation and retention of well designed, functional and sustainably built urban environments that contribute to New Zealand's overall prosperity.
- 1.2 Property Council supports the formulation and implementation of a statutory and regulatory framework that enhances economic growth and development. To achieve these goals, our advocacy and research focus on urban strategy, infrastructure, regulation and compliance, legislation and capital markets.
- 1.3 Over the years, Property Council has built and maintained a good rapport with central and local government agencies and is often relied upon for advice, comments and feedback on matters of local, regional and national importance. Our members drive economic and social growth – they are the infrastructure that houses the residential and commercial property sectors.

## 2. General comments

- 2.1 Property Council thanks the Council for giving us the opportunity to make a submission on the draft Policy.
- 2.2 We also thank the Council for its keenness to consult Property Council in relation to the establishment of SHAs and the draft Policy.
- 2.3 The draft Policy is a good start and we acknowledge its desire to enable the establishment of SHAs so as to enhance housing supply and, by extension, housing affordability.
- 2.4 We submit in favour of paragraphs 1-5, and 8-12 of the draft Policy.
- 2.5 We submit in favour of the second and third paragraphs of *A6 Affordability* under Schedule 1 – Framework for Evaluating SHAs – of the draft Policy, as well as part of *A6.g.*, because they reflect commercial realities and recognise that a blanket rule requiring a number of dwellings to be sold at a certain price creates significant cross-subsidisation by other dwellings in the SHA. The paragraphs supported above seek to satisfy the requirements of the HASHAA through other means.
- 2.6 We also submit in favour of *A13 Delegation* under Schedule 1 of the draft Policy.

### *HASHAA*

- 2.7 Property Council supports the intent of the HASHAA, the Accord and the establishment of SHAs in Hamilton.
- 2.8 Property Council notes that the HASHAA requires decisions on greenfield developments to be made within six months and decisions on brownfield developments to be made within three months. That compares with the standard system where it can take up to three years for a decision to be made.
- 2.9 The purpose of the HASHAA is to enhance housing affordability by facilitating an increase in land and housing supply in regions or districts identified as having housing supply and affordability



issues. Unfortunately, there is an error in paragraph 7 of the draft Policy in that it treats the *process* by which affordability is to be enhanced as the HASHAA's purpose/intent.

- 2.10 Property Council requests the Council to accordingly amend paragraph 7 of the draft Policy as follows (additions are underlined, deletions are ~~struck through~~):

The legislative intent of HASHAA is to enhance housing affordability by speeding up the process of bringing to market additional residential land beyond that currently zoned in the Partly Operative District Plan. Through this additional land supply, and in combination with other economic factors, the overall supply of affordable housing within Hamilton City will be enhanced.

### *The Policy will be a guidance document*

- 2.11 The principal purpose of the Policy will be to guide the Council in applying the HASHAA, as stated at paragraph 13 of the draft Policy. It is not compulsory to adopt a Policy in order to fulfil obligations under the Accord, or to establish SHAs.
- 2.12 It is therefore important to ensure the Policy remains a guidance document and that it does not misconstrue the requirements of, or introduce requirements that are not in, the HASHAA.

### **3. Key limitations of the draft Policy**

- 3.1 The draft Policy's current form is too restrictive and not enabling to the extent it could be.
- 3.2 Property Council recommends amending the draft Policy in order to avoid ambiguity and better apply the HASHAA. In addition to the discussions below, our recommended changes to the draft Policy are included as **Appendix 1**.

### *Need for consistency with the HASHAA*

- 3.3 In order to ensure the HASHAA is applied correctly, the Policy must be consistent with the HASHAA.
- 3.4 For instance, paragraph 14.j. of the draft Policy can be interpreted as placing too much emphasis on urban design qualities and beyond those stipulated under section 34(1) of the HASHAA – vis-à-vis giving lesser weight to urban design qualities as compared to matters at section 34(1)(a) – (d) of the HASHAA.
- 3.5 In its current form, paragraph 14.j. of the draft Policy can cause ambiguity amongst Council staff. Property Council therefore recommends the Council to amend paragraph 14.j. of the draft Policy as follows:

Development of SHAs will ~~achieve high quality urban design outcomes~~ be in accordance with section 34 of the HASHAA.

### *Lack of clarity around when SHA applications may be made*

- 3.6 The proposed requirement at paragraph 16 of the draft Policy indicates that developers will not be able to actively seek the establishment of SHAs but that the Council will call for proposals from time to time. This proposed approach is very restrictive and not at all proactive in terms of enhancing housing supply and affordability.
- 3.7 Property Council submits that paragraph 16 be accordingly amended as follows:

Council will, ~~from time to time at its discretion,~~ call for process and assess proposals received at any given time from land owners and developers seeking to become a SHA. Proposals can be made by any party, including Council.

### *Excessive emphasis on the POPD to maintain the status quo*

- 3.8 As alluded to in paragraph 2.8, one of the reasons for enacting the HASHAA and establishing SHAs is that the standard planning process has fallen short of enabling sufficient housing. The Policy must therefore be more enabling.
- 3.9 Unfortunately, the draft Policy places an overemphasis on the PODP at the expense of achieving the outcomes being sought by the HASHAA and the Accord.
- 3.10 Property Council submits that the draft Policy should be amended so that the Policy is more enabling and does not place an overemphasis on the Council's strategic land use planning and the PODP. The changes recommended in this regard are laid out in Appendix 1.

### *Averseness to greenfield development*

- 3.11 The key mechanism in the HASHAA is the creation of SHAs in greenfield and brownfield areas suitable for residential development, where there is demand for new housing, and where infrastructure is already available *or is likely to exist*.
- 3.12 The draft Policy indicates that the Council's focus will be brownfield areas, that is, areas already zoned and/or already accounted for in the Council's capital works programme for infrastructure provision. We interpret paragraphs 14.d., g., and h. (under Principles) of the draft Policy as alluding to this.
- 3.13 For instance, paragraph 14.g. of the draft Policy states that where infrastructure is unavailable, all necessary infrastructure will be funded and provided by the developer. This (proposed) requirement fails to realise the reality that developers do not have the required balance sheet to be able to carry multimillion-dollar debt for 25-30 years. Requirements such as this will do little to incentivise the establishment of SHAs in (new) greenfield areas.
- 3.14 There are some landholdings that are being proposed as part of the draft Future Proof Strategy May 2017 to come within Hamilton City boundaries in the short/medium term. These landholdings:
- adjoin existing residential activity
  - have the ability to connect to existing Council infrastructure within the short/medium term
  - can help enhance housing supply and affordability if they can take advantage of the fast-tracking process available to SHAs.
- 3.15 Instead of being overly averse to greenfield development, the Council can consider tranches. This approach would allow SHAs to be established in greenfield areas with no infrastructure and receive consenting now, but with infrastructure being provided at a future date, once the Council is able to accommodate the works in its capital works programme. Such an approach would:
- (i) allow the development community to take advantage of the fast-track process under the HASHAA for greenfield areas with no infrastructure available
  - (ii) provide clear signals to the Council in terms of where and when infrastructure is to be provided

- (iii) give a clear indication to developers that they can wait for several years for the infrastructure to be supplied, or go ahead and provide the infrastructure themselves
- (iv) achieve synchronisation with, and give better effect to, the Hamilton Urban Growth Strategy
- (v) help the Council better meet its obligations under the National Policy Statement on Urban Development Capacity.

As stated by the Auckland Unitary Plan Independent Hearings Panel in July 2016, it was not persuaded that the funding of infrastructure should be allowed to determine land use planning.

- 3.16 The draft Policy implies that SHAs in greenfield areas where the Council's strategic infrastructure networks are unavailable ought to be avoided; however, a more enabling approach could be considered to unlock development potential for sites of this nature.

#### *Different requirements for private and social housing providers*

- 3.17 Both the private sector and the charitable sector play important roles in enhancing housing affordability and housing supply. There is no good reason in preferring one over the other. In particular, the Accord talks of a "well-functioning private sector led housing market".

- 3.18 The draft Policy draws a distinction between private housing providers and social housing providers (for example, about a 10-dwelling minimum). Property Council is unsure of the justifications for this distinction, particularly in the context of achieving the purpose of the HASHAA.

- 3.19 The draft Policy uses the term 'developers' in some places and the terms 'private housing providers' and 'social housing providers' at other places. Property Council recommends that the Council consider replacing the words 'private housing providers' and 'social housing providers' with 'developers'. We note the change will also be of benefit to the Council in the event the Council decides to convert land it owns to housing, and wants to take advantage of the fast-tracking process available to SHAs.

#### **4. Converting some industrial land to SHAs for wider gains**

- 4.1 The Policy should encourage the unlocking and conversion of landholdings that can be utilised for residential activity in the short-term, thus unlocking housing supply over the next one to five years which is when most of the pressure will manifest in terms of supply given that the infrastructure for Peacocke and Rotokauri is unlikely to be in place before then.

- 4.2 Property Council recommends that the Policy should recognise that:

- some industrial land is suitable for SHAs, particularly where it adjoins existing residential activity and appropriate reverse sensitivity controls are already in place, given industrial land adjoining residential activity is generally compromised by amenity protection setbacks, landscape buffers, noise and other reverse sensitivity controls.
- some industrial land is suitable for SHAs, particularly those sites where industrial development is constrained in some way due to poor access or access that requires cost prohibitive upgrades.
- some industrial and business zoned land is suitable for SHAs, where the land is: in close proximity to significant social infrastructure such as healthcare and/or educational facilities (for example, the Hospital and/or the University of Waikato); near the Central Business District (and hence assisting with revitalisation of the CBD); and in those parts of the city where the availability of residential sections is limited/in short supply.

- 4.3 It is essential that the Policy encourages the use of lower order business land (that is, land zoned Business 6) for SHAs particularly where there is existing mixed-use development and in certain locations where business activities are no longer viable or supported by the catchment.

**5. Conclusion**

- 5.1 We value our longstanding and close relationship with the Council, and we appreciate the regular opportunities we have to engage with the Council on various matters of importance.
- 5.2 We would welcome the opportunity to engage further with the Council on the issues raised in this submission, and also assist with further analysis of the draft Policy.
- 5.3 As stated earlier in our submission, the specific changes being recommended to the draft Policy are attached as **Appendix 1**.

Yours sincerely



Thomas Gibbons  
President  
Waikato Branch

14 July 2017

## Appendix 1 – Recommended changes to the draft Hamilton Special Housing Areas Policy

➤ Additions are underlined, deletions are ~~struck-through~~

Paragraph/ Schedule	Recommended change	Reasoning
6	HASHAA also requires any new development enabled under it to have adequate infrastructure provision and to ensure design quality (as articulated in the New Zealand Urban Design Protocol) is delivered. <del>For HCC, this is achieved in the Policy by using the existing relevant urban design provisions in the Partly Operative District Plan as a policy consideration. The Partly Operative District Plan is also relied on to assist in appropriate residential zone selection for SHA sites not currently zoned for residential purposes.</del>	It is not appropriate for the Council to superimpose PODP requirements into a process that is designed to work outside the PODP. Section 34 of HASHAA sets out a code for the consideration of relevant factors, and it is entirely possible that (for example) the NZ Urban Design Protocol could be given regard in a manner that departs from the PODP.
7	The legislative intent of HASHAA is to <u>enhance housing affordability by speeding up</u> the process of bringing to market additional residential land beyond that currently zoned in the Partly Operative District Plan ( <u>PODP</u> ). Through this additional land supply, and in combination with other economic factors, the overall supply of affordable housing within Hamilton City will be enhanced.	The change is to reflect the purpose of the HASHAA.
13	The purpose of this Policy is to establish the process and evaluation criteria that will guide Council in making decisions on whether to accept a proposal for an SHA and recommend to the Minister that a proposed SHA be established. <u>This Policy remains subject to the HASHAA at all times.</u> For the avoidance of doubt the policy shall inform <del>HCC's Council's</del> application of the Act HASHAA. <u>The policy aims to describe the process and evaluation criteria that will guide Council in considering proposals for SHAs.</u> In the event of any conflict between the policy, the PODP and the <del>Act</del> <u>HASHAA</u> , the <del>Act</del> <u>HASHAA</u> shall prevail.	The Policy should not “establish” criteria, as these are set out in the HASHAA, and the Policy should not seek to work beyond the HASHAA. Any guidelines should only guide the Council in considering a proposal, not determine acceptance and/or a recommendation to the Minister.
14	The principles that will be promoted by Council <u>in</u> implementing this policy are <u>(in no particular order)</u> : a. <del>Council will openly engage with the community on the identification of the identification of potential areas in the City for consideration as SHAs</del> <u>The need to give effect to the HASHAA and the Hamilton Housing Accord (the Accord).</u> b. Council will work with Waikato-Tainui to give effect to the co-management arrangements under the Joint Management Agreement in the context of SHAs <del>and</del>	a. This should guide all decisions given this is what has necessitated the need for a Policy. b. Words have been deleted because if the Council is working effectively with Waikato-Tainui, the Council should not

	<p><del>will consider effects on the unique tangata whenua relationships, values, aspirations, roles and responsibilities with respect to areas identified for consideration as an SHA.</del></p> <p>c. Council will work collaboratively with private housing providers ('PHPs'), social housing providers ('SHPs') and the Government to increase housing supply and opportunities for affordable housing.</p> <p>d. Council will enable SHAs that achieve the purpose of HASHAA <del>provided they do not compromise or undermine Council's existing or planned infrastructure, and is generally consistent with Council's strategic land use planning.</del></p> <p><del>e. Council will enable land within SHAs to be used to deliver a range of housing types to the market at different price points in order to achieve the purpose of HASHAA.</del></p> <p><del>f. SHAs must be serviced by and integrated with Council's strategic infrastructure networks.</del></p> <p><del>g. Where Council's strategic infrastructure networks are unavailable to an SHA for any reason, including but not limited to lack of network capacity or connectivity, all necessary infrastructure will be provided and funded by the developer at no cost to Council.</del></p> <p><del>h. Development within SHAs will be consistent with the evaluation criteria and objectives set out in the schedules to this Policy. Priority will be given to establishing SHAs that are consistent with the strategic direction set within the Partly Operative District Plan ('PODP').</del></p> <p><del>i. Development within SHAs will occur as quickly as practicable.</del></p> <p>j. e. Development of SHAs will <u>achieve high quality urban design outcomes</u> <u>be in accordance with section 34 of the HASHAA.</u></p>	<p>need to spell out the particular issues that will be considered.</p> <p>c. Support.</p> <p>d. Some words have been removed because the Council should not be superimposing additional requirements on SHAs that achieve the purpose of HASHAA. The Council should not be imposing infrastructure requirements or "strategic land use planning" considerations on HASHAA (we also note that the latter phrase in quotes is unnecessarily vague.</p> <p>As stated in our submission, the principal purpose of the ensuing Policy will be to guide the Council in applying the HASHAA (as stated at paragraph 13 of the draft Policy). Paragraphs e-i have been deleted because they create the risk of not being consistent with the HASHAA, particularly section 34 of the HASHAA.</p> <p>e. The Policy needs to be consistent with the HASHAA.</p>
15	The intended outcomes from Council implementing the Policy are <u>(in no particular order)</u> :	

	<p>a. Create certainty in respect of Council’s approach to SHAs which assists the development community in making investment decisions <u>(and recognise that unnecessary Council discretion can impede certainty)</u>;</p> <p>b. <del>In collaboration with the development community, g</del>Give effect to the <del>Hamilton Housing</del> Accord and its targets for land supply and housing <u>in close collaboration with the development community.</u></p> <p>c. <u>Enable</u> <del>T</del>the creation of SHAs <del>that achieve the purpose and principles of this Policy in line with the HASHAA.</del></p> <p>d. <del>Ensure SHAs are generally consistent with and have regard to the relevant provisions of the POPD.</del></p>	<p>a. The addition has been made to highlight that too much discretion comes at the cost of certainty, which can be a significant impediment to the establishment of SHAs.</p> <p>b. Support – minor changes for better flow.</p> <p>c. The ensuing Policy’s purpose will be to <i>enable</i> the creation of SHAs in line with the HASHAA. This is what has necessitated the need for a Policy. By stating that the Policy’s intended outcome is the creation of SHAs, the Council is tying itself to a much higher threshold, that is, the Council’s and the Policy’s success will be measured by the number of SHAs that are established.</p> <p>d. Deleted because of the over-emphasis on the POPD. Section 34 of the HASHAA means that the Council will need to have regard to the POPD when considering resource consent applications anyway.</p>
<p>16</p>	<p>Council will, <del>from time to time at its discretion, call for</del> <u>process and assess proposals received at any given time</u> from land owners and developers seeking to become a SHA. Proposals can be made by any party, including Council.</p>	<p>The Council should be enabling the process. Having Council call for proposals (at its discretion) means the Council determines timeframes, and can delay consideration of SHA proposals (therefore impeding the intent of the Accord).</p>
<p>17</p>	<p>Council will process and assess all proposals for SHAs <u>promptly in the manner set out in accordance with the HASHAA, the Accord, and (where applicable) this Policy (in that order).</u></p>	<p>It is important that primacy is given to HASHAA, not to the Council’s Policy.</p>
<p>18</p>	<p><del>The evaluation criteria which council will apply to its assessment of a proposal are set out in the Schedules to this Policy. Proposals will need to demonstrate how they satisfy all of the mandatory and discretionary criteria attached to this Policy.</del></p>	<p>It is important that primacy is given to HASHAA, not to the Council’s Policy. It is inappropriate for Council to add additional requirements to what is set out in HASHAA.</p>

19	<p><del>In its assessment of a proposal Council staff will apply the evaluation criteria set out in the Schedules of this Policy, and have regard to the purpose and principles set out in sections 13 and 14 of this Policy.</del></p>	<p>It is important that primacy is given to HASHAA, not to the Council's Policy. It is inappropriate for Council to add additional requirements to what is set out in HASHAA.</p>
20	<p><del>While the evaluation criteria set out in the schedules of this Policy will guide Council's decision making, Council reserves itself the discretion to accept or reject a proposal for recommendation to the Minister. Council will enable SHAs that meet the requirements of HASHAA and the Housing Accord. Council will seek to give effect to all proposals unless there are very good reasons not to do so.</del></p>	<p>The Council does not need to reserve itself a discretion.</p>
21	<p><del>Upon receipt of a proposal, Council staff will undertake an initial evaluation of the proposal to determine its level of consistency with this Policy. At this stage, full Council will determine, at its sole discretion, whether to continue with the evaluation or to reject the proposal.</del></p>	<p>Again, discretion can be removed.</p>
22	<p><del>If the evaluation proceeds to detailed stage beyond this point, Council will:</del></p> <p><del>22.1 Seek public feedback including from statutory agencies and relevant Iwi;</del></p> <p><del>22.2 Seek comment and evaluative input from relevant council departments;</del></p> <p><del>22.3 Fully assess the proposal in accordance with this Policy, and in particular the purpose and principles and Schedules of this Policy;</del></p> <p><del>22.4 Receive staff recommendations; and</del></p> <p><del>22.5 Decide whether to reject the proposal, or accept the proposal in principle.</del></p> <p><u>Following that initial evaluation, Council staff will promptly liaise with the applicant as to any issues with the proposal and ask the applicant whether it wishes to:</u></p> <p>a. <u>amend the proposal;</u></p> <p>b. <u>withdraw the proposal; or</u></p> <p>c. <u>send the application to a full Council as it stands (but with relevant staff comment).</u></p> <p><u>If a proposal is amended, it will then be promptly sent to full Council (with relevant staff comment). Council will then make a decision on whether to:</u></p> <p>a. <u>recommend the proposal to the Minister; or</u></p> <p>b. <u>recommend the proposal to the Minister, subject to a development agreement as below; or</u></p> <p>c. <u>Decline the proposal, with reasons.</u></p>	<p>It is accepted that some proposals may not be sufficient or complete when initially received. The proposed mechanism is that the applicant is invited to make changes, but that the applicant can still require consideration of the application by the Council, in order to ensure that elected members have the opportunity to promptly consider all proposals.</p> <p>Public feedback does need not be considered at this stage given specific consent applications could be notified.</p> <p>Input from council departments can be part of staff consideration.</p> <p>The evaluation should focus on the HASHAA, not the Policy.</p>



23	<p>If a proposal is accepted in principle necessary, Council will then enter into negotiations with the proponent to secure, through a development agreement, the delivery of the outcomes set out in the proposal and any other outcomes required by Council, including the provision of any necessary infrastructure required to service the proposal. <u>Council acknowledges that a development agreement is not an opportunity to revisit the proposal, and that any development agreement must be negotiated and prepared in a manner that gives effect to HASHAA and the Accord.</u></p>	<p>A development agreement should not be necessary in all cases.</p> <p>Development agreements can take time to negotiate, and it is important that the Council gives priority to giving effect to HASHAA, rather than impeding SHAs by unreasonable development agreement requirements. The wording relating to “other outcomes required by Council” has been removed as the Council should not be using a SHA proposal and development agreement to seek other outcomes.</p>
24	<p>If negotiations lead to a legally binding development agreement, on terms acceptable to Council, Council will, at its discretion, then consider accepting the proposal for recommendation to the Minister. A proposal accepted by Council <u>under 22 above will be recommended to the Minister either:</u></p> <ol style="list-style-type: none"> <li>a. <u>Following a Council decision; or</u></li> <li>b. <u>Following a development agreement being signed.</u></li> </ol>	<p>We are at a loss to understand why it should be necessary to enter into a development agreement, and then face a further discretion before the proposal goes to the Minister. Such a requirement is unnecessarily cumbersome.</p>
25	<p>If a proposal is accepted under section 232 of this Policy, Council will then collaborate with the proponent in making the recommendation to the Minister that the proposed SHA be established.</p>	<p>Cross reference change.</p>
<b>Schedule 1 – Framework for Evaluating SHAs</b>		
A1	<p>The Council is satisfied that there is evidence that the proposed qualifying development/s in the SHA will deliver new residential housing that supports the aims and targets of the Accord <del>within 1 year of being declaration of SHA status.</del></p>	<p>The Council does not need to apply a 12-month filter.</p> <p>Further, actual development occurring within one year depends on a range of factors, such as the scale of the development (10 lots versus 1,000) earthworks seasons, provision of infrastructure, securing of finances, et cetera.</p>
A2	<p><del>The Council is satisfied that there is evidence of demand for a range of housing types that could be developed within a SHA.</del></p> <p><del>The Council is satisfied that a variety of dwelling sizes and dwelling ownership or tenure arrangements are not ruled out by any proposed terms and conditions or covenants that would apply within the SHA.</del></p>	<p>It is not the Council’s role to ‘second guess’ demand for housing types.</p> <p>The Council does not need to consider any variety of “dwelling sizes” (there are already maximums stated), “dwelling ownership” or “tenure arrangements”, as these are not</p>

		<p>relevant factors under the HASHAA. The HASHAA concerns special housing areas, not necessarily mixed-tenure.</p> <p>It is noted that the HASHAA allows an Order-in-Council to establish qualifying criteria – it is not a council’s role.</p>
<p>A3</p>	<p>A qualifying development within a proposed SHA will be predominantly residential and have the primary purpose of supplying dwellings to the market. <del>Any non-residential activities should be ancillary to the residential development and negotiated with the Council including reserves and open space areas, and commercial or community activities before the recommendation for a SHA is made to the Minister for Building and Construction.</del></p>	<p>This is not something that should have to be “negotiated” with Council. The first sentence is sufficient as a criterion.</p>
<p>A4</p>	<p>Proposals for SHAs will be considered for their suitability for development in all zones (other than those exceptions identified in Schedule 2) <del>subject to the following locational criteria:</del></p> <p><del>a. In accordance with Principle 14(dc) of this Policy, Council will enable SHAs that achieve the purpose of HASHAA provided they do not compromise or undermine Council’s existing or planned infrastructure, nor materially alter or compromise Council’s strategic land use planning. SHAs proposed for locations outside areas zoned residential in the PODP are more likely to conflict with Principle 14(c) than those SHAs proposed within a residential zone. Accordingly, Council will require a proportionate approach to the supply of supporting evaluative evidence addressing the matters set out in these schedules, depending on whether a proposal is located within or outside an existing residential zone. Less evidence will be required for a proposal within a residential zone than for one outside a residential zone.</del></p> <p><del>b. Consideration of proposals in non residential zoned areas under the PODP such as the industrial zone will be required to have provided evidence that they have consulted with, addressed reverse sensitivity and materiality of effect on established land uses in both existing and adjoining zones.</del></p> <p><del>c. A proposal should demonstrate that it is consistent with Council’s strategic land use framework set out in the PODP and does not limit the Council’s ability to meet its National Policy Statement on Urban Development Capacity (NPS-UDC)</del></p>	<p>The Policy should not impose zoning restrictions on SHA applications.</p> <p>a. The Council should not superimpose its own (and vague) “strategic land use planning” or “planned infrastructure” over HASHAA or the Accord when considering SHA proposals.</p> <p>b. The Council should not superimpose consultation requirements that are not in the Act.</p> <p>c. The Council seems to be taking the view that the HASHAA is subject to the National Policy Statement on Urban Development Capacity (NPS-UDC) – this does not appear</p>

	<p><del>requirements for employment land. Council will evaluate all impacts on future employment land capacity both individually and cumulatively.</del></p> <p>d. <del>For all proposals Council would also need to be satisfied that there is an immediacy to the development to meet proven demand and the proposal is of a suitable scale and able to be serviced in accordance with section A5 below.</del></p> <p>e. <del>Schedule 2 identifies zoned land and land identified on the features legend to the planning maps to the PODP that have high environmental values and or constraints that make them not suitable for the development for SHAs.</del></p>	<p>to be the case. In any event, it is not appropriate for the Council to put an SHA applicant in Council’s shoes in order to meet its obligations under the NPS-UDC. It is also noted that proposals on non-residential land: (a) will create employment opportunities in the construction and building industries; (b) will, in the case of mixed-use developments, create ongoing opportunities for employment; and (c) are, in many cases, required to house a growing population working in a range of ways (whether from home, from commercial operations, in industrial roles, et cetera). As noted above, the HASHAA already provides for planning matters to be considered under section 34, and the Council should not extend beyond these.</p> <p>d. and e. provide an unnecessary gloss on section 34 of HASHAA (the exceptions for Schedule 2 land are noted).</p>
<p>A5</p>	<p>The Council is satisfied that either:</p> <p>a. <del>Adequate infrastructure exists to accommodate the likely additional individual and cumulative demand from a qualifying development in the area; or</del></p> <p>b. <del>Infrastructure can and will be provided and funded by the landowner or developer at no cost to, and without unforeseen or adverse financial or environmental costs on the Council or other relevant infrastructure providers.</del></p> <p>The Council will assess the infrastructure requirements of a proposed SHA against the matters listed in Schedule 3 to this Policy.</p>	<p>Section 34(3) of the HASHAA already provides for infrastructure considerations. It is inappropriate for the Council to superimpose additional infrastructure requirements. It is also noted that the infrastructure requirements of Schedule 3 extend beyond those in the HASHAA, which is again inappropriate.</p> <p>While it is acknowledged that the Tauranga City Council policy has similar wording, it is important to remember that a key outcome of the Policy is enabling the establishment of SHAs.</p>
<p>A6</p>	<p><del>To achieve the targets in the Accord to deliver more dwellings, the Council will negotiate housing outcomes for each SHA and/or qualifying development on an individual basis.</del></p> <p>The delivery of more affordable housing options within qualifying developments will be assessed against the need for development to remain profitable and commercially viable.</p>	<p>The Council should not be seeking to negotiate housing outcomes. Proposals should set out intended outcomes, which the Council (and the Minister) will assess in accordance with the HASHAA.</p>

<p>Council will require a certain proportion of qualifying developments to comprise small subdivision allotments and/or dwellings to deliver more affordable private housing.</p> <p><del>The delivery of more community housing will be encouraged by promoting collaborative schemes with Housing New Zealand and Registered SHPs and partnerships between the public and the private housing sectors.</del></p> <p>These housing outcomes will cover:</p> <ol style="list-style-type: none"> <li>a. The type and size of dwellings to be built by PHPs: in all SHAs at least 20% of dwellings will comprise two-bedroom dwellings of 150m<sup>2</sup> gross floor area or less unit size.</li> <li>b. The size of sections created by PHPs: PHPs will be required to provide at least 20% of the allotments at smaller sizes of 350m<sup>2</sup> or less.</li> <li>c. The minimum 20% provided by PHPs shall apply to the total potential yield of the qualifying development or each stage of the qualifying development.</li> <li>d. The nature of any covenants (or similar restrictions) imposed on sections <u>by the developer</u> shall be agreed and recorded on titles;</li> <li><del>e. The potential for a development to target specific housing need e.g. first home buyers, the rental market or social housing;</del></li> <li><del>f. A requirement that the PHP engages with the Housing New Zealand or a Registered SHP to explore options to provide social housing, and where appropriate, to provide an acceptable legal mechanism for dwellings to be retained as social housing (freehold or rental).</del></li> <li>g. The Council is open to proposals that address affordable housing through other mechanisms <del>that are consistent with the principles set out in section 8 of this policy but retains preference for the registered SHP involvement as per A6 f. above.</del></li> <li><del>h. The potential for a PHP to spread or mix the type and size of sections and dwellings to be developed throughout the proposed SHA.</del></li> </ol>	<p>The principal purpose of the Policy will be to guide the Council in applying the HASHAA, and a key outcome of the Policy will be to enable the establishment of SHAs. It is not the Policy’s role to promote PPPs.</p> <p>Property Council understands these are the Council’s key affordability measures. These are noted.</p> <ol style="list-style-type: none"> <li>d. It is important to note that neither SHPs nor PHPs can control covenants that owners mutually agree after sale.</li> <li>e. It is submitted that it is too difficult for the Council to assess need in these areas.</li> <li>f. It is not appropriate for the Council to mandate that the private sector engage with Housing New Zealand or SHPs, nor to mandate social housing. We refer again to the purpose of HASHA, that is, “The purpose of this Act is to enhance housing affordability by facilitating an increase in land and housing supply ...”. It is not a social housing Act, and nor should the Council impose or establish this requirement.</li> <li>g. The changes are to ensure the Policy is flexible and better meets the requirements of the HASHAA.</li> </ol>
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	When a SHP partners with a PHP to develop a SHA and Council is satisfied that sufficient evidence has been provided of genuine partnership and intention to develop the land then the Proposal will be assessed solely against the applicable policy for SHPs.	h. The matters at a-c above are sufficient.
A7	<p>The maximum calculated building height for a qualifying development in a proposed SHA will be determined as part of the declaration of that SHA. It will be determined by the Council in discussion with the landowner/ developer with reference to:</p> <p>a. <del>The characteristics and the existing built environment of the land in the SHA and land directly adjoining;</del></p> <p>b. <del>The maximum height provided for in the zone of under the PODP that applies to the land and the land directly adjoining in question;</del></p> <p>c. <del>The maximum height provided for in the Act</del> HASHAA: 6 storeys (or any lesser number prescribed) and a maximum height of 27 meters (or any lower maximum calculated height prescribed).</p>	Neither (a) nor (b) are necessary filters under the HASHAA. The PODP reference again goes against the HASHAA.
A8	<p>The minimum number of dwellings required in a proposed SHA provided by a PHP to constitute a qualifying development is 10 units <del>in residential, greenfield, future urban or appropriate non-residential zoned areas as determined under the PODP.</del></p> <p><del>Dwellings described by housing typology shall be calculated at a minimum average net site density of at least 16 dwellings per hectare or otherwise as in accordance with the relevant zone rules of the PODP, whichever is the greater.</del></p> <p>There is no minimum threshold if the SHA is a Housing New Zealand or Registered Social Housing Scheme.</p>	The Council should not be mandating density or typology, or imposing a PODP 'filter' on applications/proposals.
A9	A SHA proposal shall have regard to the <del>height, bulk and scale of development within the existing residential zone where appropriate and any relevant design criteria in the PODP</del> <u>New Zealand Urban Design Protocol and in the manner of weighting stipulated at section 34 of the HASHAA.</u>	The Policy should be consistent with the HASHAA, and the PODP should not be superimposed.

<p>A10</p>	<p>For the purpose of clarifying the effect of sections 15(8) and 34(1)(d) of the Act HASHAA, any reference to the <u>P/ODP</u> will be a reference to the objectives, policies and rules for the appropriate residential zone or other provisions including overlay Policy Areas that apply to the area that supports residential development. The appropriate zone may not be the zone that the development is actually located in, particularly in instances where a <u>SHA is located on land that does not have residential zoning, for example, land with industrial or rural zoning.</u></p>	<p>It is not necessary or appropriate for the Council to add to the wordings of HASHAA or the Housing Accord. The proposed changes are in line with paragraph 28 of the Accord.</p>
<p>A11</p>	<p>Delete entirely</p>	<p>It is inappropriate for the Council to impose PODP considerations on SHAs, other than as provided for in the HASHAA. This is especially given section 34 of the HASHAA means that the Council will need to have regard to the POPD when considering resource consent applications anyway.</p>
<p>A12</p>	<p><del>The Council's operative DC Policy and operative Growth Funding Policy is the default approach to all qualifying developments. However, alternative approaches to infrastructure funding may be considered and potentially applied during the life of the Accord.</del></p> <p><del>All Council staff time and other costs of considering and processing proposals for SHA selection and resource consent applications including negotiating SHA developer agreements will be on-charged to the landowner or developer in accordance with the Resource Consent and Engineering Fees and Other Charges Schedule adopted by Council.</del></p> <p><u>The Council will have regard to infrastructure requirements as set out in HASHAA.</u></p>	<p>The HASHAA provides sufficient guidance in matters relating to infrastructure provision.</p>
<p><b>Schedule 2</b></p>	<ul style="list-style-type: none"> <li>• All Special Character Zones (excluding Peacocke Terrace Area)</li> <li>• All <u>Recreational Open Space Zones</u></li> <li>• Significant Archaeological, Historic and Cultural Sites</li> <li>• Electricity Transmission Corridors <u>identified in the P/ODP maps</u></li> <li>• Natural Hazard Areas <u>except where the effects of natural hazards can be appropriately managed</u></li> <li>• <del>Special Heritage Areas</del></li> <li>• <del>Special Significant Natural Areas</del></li> <li>• Large Lot Residential Zone</li> </ul>	<ul style="list-style-type: none"> <li>• There are no “Recreational Zones” in the PODP. They are called “Open Space Zones”.</li> <li>• “Electricity Transmission Corridors” should be qualified as being those identified on the P/ODP maps.</li> <li>• “Natural Hazard Areas” include those sites subject to flood areas (low to high risk) and gully slopes. It is not ideal to expressly exclude these areas from consideration</li> </ul>

		<p>as SHAs where the effects (of the natural hazards) can be appropriately managed.</p> <ul style="list-style-type: none"><li>• “Special Heritage Areas” are a sub-set of the “Special Character Zone” so there is no need to restate this exclusion</li><li>• There are no “Special Natural Areas” in the PODP. They are called “Significant Natural Areas”.</li></ul>
<b>Schedule 3</b>	Delete	Extends beyond the HASHAA
<b>Schedule 4</b>	Delete	Extends beyond the HASHAA

## Proposed Housing Accord Policy

### Do you have any supporting documentation you would like to include?

Submission attached.

### Hearings and Contact Information

**Do you wish to speak in support of your submission at a Council hearing?** *If you don't want to speak at the hearing, but would like staff to know who this submission is from, you are welcome to fill in the Contact Details section.*

No

<b>Are you responding as:</b>	Not Answered
<b>What is your name?</b>	James McIvar
<b>What is your organisation?</b>	Tainui Group Holdings Ltd



**From:** James McIlvar [<mailto:James.McIlvar@tgh.co.nz>]

**Sent:** Friday, 14 July 2017 11:55 AM

**To:** Luke O'Dwyer

**Subject:** Submission to Hamilton City Council – Draft Hamilton Special Housing Area Policy

Hi Luke,

As discussed, considering TGH's involvement with Waikato Tainui on the Jebson Place development site, please accept the below correspondence as feedback on the draft SHA policy:

### **Submission to Hamilton City Council – Draft Hamilton Special Housing Area Policy**

Waikato Tainui is a strong supporter of affordable housing both for its own people and also for the benefit of the more vulnerable members of society in Hamilton City. We consider that the Policy will assist Council to meet its obligations under the National Policy Statement on Urban Development Capacity and recognises that the current lack of affordable housing in Hamilton is adversely affecting the poor in our community along with shutting out first home buyers from getting a start in the housing market.

TGH/Waikato Tainui are currently working collaboratively on a project with Housing New Zealand Corporation (HNZC) to jointly develop a site at 5A Cassidy Street, Hamilton East. Consent was granted by Hamilton City Council to HNZC (HCC consent number 011.2016.6314.001) on 8 March 2017 for this development. Waikato Tainui are now seeking to progress this development, albeit potentially in a different form and as such would like the opportunity for this site to be considered under the Policy because of its unique characteristics relating to it being owned by one landowner, being serviced and being landlocked by roading on three sides.

The first clause in Schedule 2 states that All Special Character Areas (excluding Peacocke Terrace Area) will not be considered for the establishment of a SHA. We consider this exclusion to be inappropriate and fails to recognise that there may be development sites located within Special Character Areas that fit all of the other requirements for a SHA, and with further consideration are also appropriate under the provisions of that Special Character Area.

Importantly, while the Jebson place site is located in a Special Character Zone (being the Special Residential Zone), the Council's notification report concluded: *"the existing development on the site does not display very many of the characteristics identified as being typical of the Hamilton East Area."* Although this site is in a Special Character Zone, further investigation concluded that the zone wide characteristics did not apply to this specific site. In our view, this situation would not be unusual and would likely occur elsewhere around the city where the Special Character Area zone provisions are not necessarily demonstrated throughout the entire area and a blanket exclusion is unwarranted. Doing so would unfairly penalise sites that could provide SHA opportunities, particularly since the SHA process requires each site to be considered on its merits anyway.

Our submission is that Schedule 2 – Areas not suitable for the establishment of SHAs, be amended to remove reference to All Special Character Zones and that the requirements of section A11 in Schedule 1 be amended to ensure that the relevant performance standards and assessment criteria in any Special Character Area can be met by the SHA proposal. This could be achieved by inserting the words: "or Special Character Zones" after the words; "General Residential" in the first line of criteria A11 in Schedule 1 of the Policy.

This amendment will ensure that the SHA policy promoted by Hamilton City Council will deliver quality, affordable housing with appropriate density in reasonable timeframes.

### **Best Regards**

**James Mc Ilvar** | Development Manager - Property

DDI: 07 8580466 | Mobile: +64 27 8442 884 | Fax: +64 7 834-4881

Email: [james.mcilvar@tgh.co.nz](mailto:james.mcilvar@tgh.co.nz) | PO Box 19295 Hamilton 3244

6 Bryce Street Hamilton | [www.tgh.co.nz](http://www.tgh.co.nz)



## Proposed Housing Accord Policy

### Do you have any supporting documentation you would like to include?

Submission attached.

### Hearings and Contact Information

**Do you wish to speak in support of your submission at a Council hearing?** *If you don't want to speak at the hearing, but would like staff to know who this submission is from, you are welcome to fill in the Contact Details section.*

Yes

**Are you responding as:**

Not Answered

**What is your name?**

Tim Manukau

**What is your organisation?**

Te Whakakitenga o Waikato Incorporated



**SUBMISSION: Hamilton City Council - Draft Special  
Housing Area Policy**

**To: Urban Policy Team – Hamilton City Council**

This Submission is from:

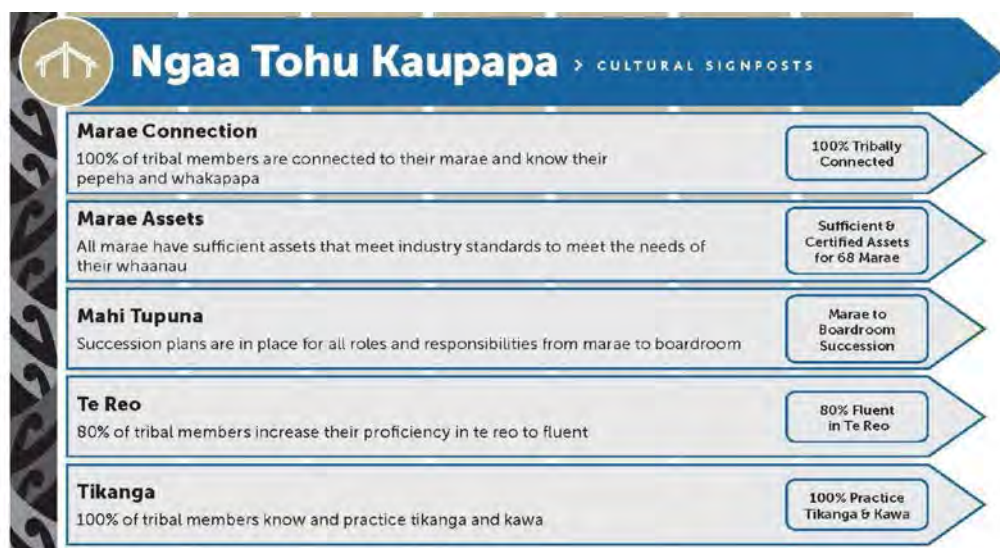
**Te Whakakitenga o Waikato Incorporated**  
C/o Waikato Raupatu Lands Trust  
PO Box 481  
Hamilton

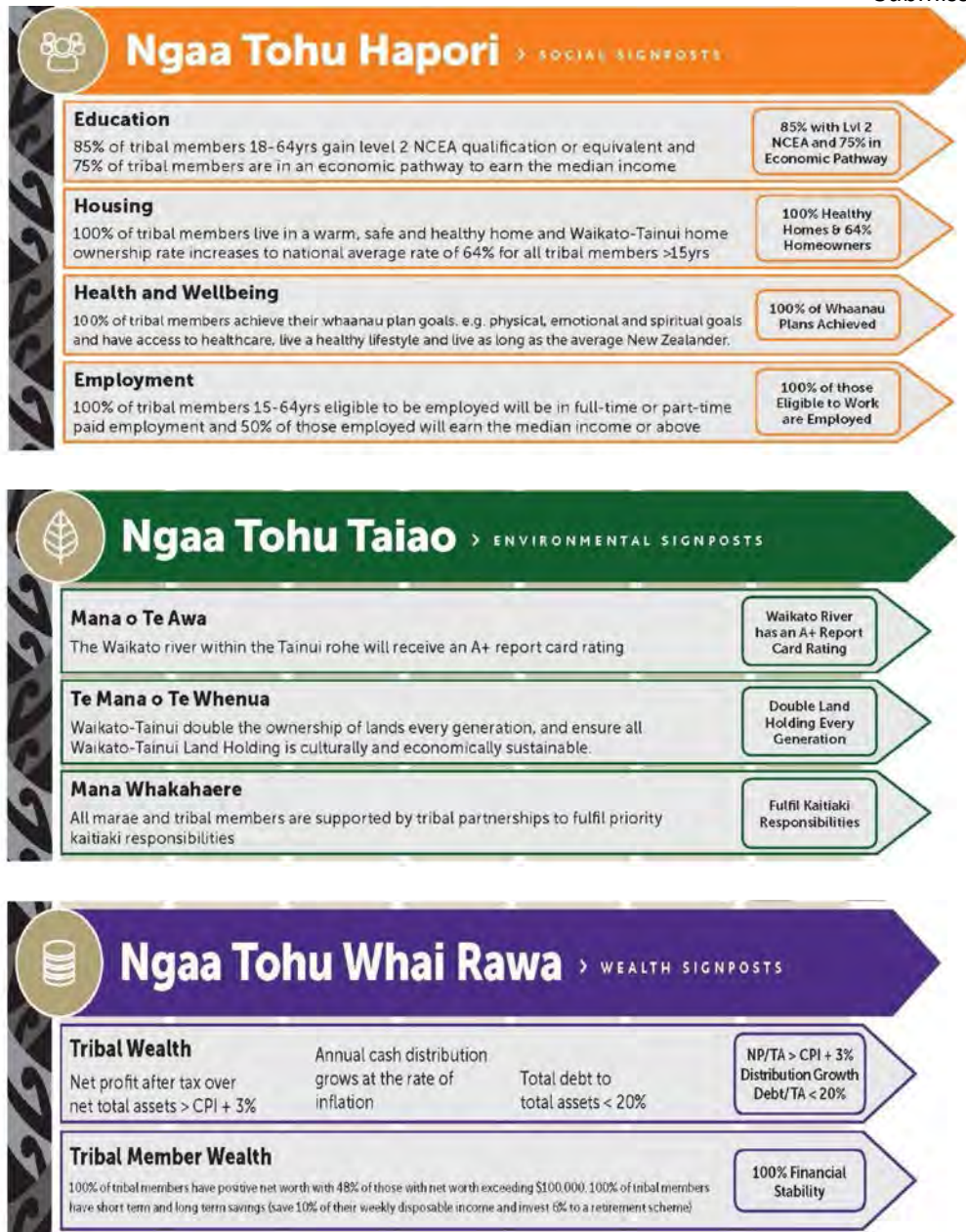
## INTRODUCTION

1. This submission is made on behalf of Te Whakakitenga o Waikato Incorporated (formerly known as Waikato-Tainui Te Kauhanganui Incorporated) on the Hamilton City Council - Draft Special Housing Area Policy.
2. Te Whakakitenga o Waikato Incorporated (Waikato-Tainui) is the governing body for the 33 hapuu and 68 marae of Waikato Tainui and manages the assets of Waikato Tainui for the benefit of over 67,000 registered tribal members.
3. Waikato-Tainui makes this submission on behalf of our hapuu and iwi members. The rohe (tribal region) of Waikato-Tainui is bounded by Auckland in the north and Te Rohe Potae (King Country) in the south and extends from the west coast to the mountain ranges of Hapuakohe and Kaimai in the east. Significant land marks within the rohe of Waikato include the Waikato and Waipaa Rivers, the sacred mountains of Taupiri, Karioi, Pirongia and Maungatautari, and the west coast of Whaaingaroa (Raglan), Manukau, Aotea and Kawhia moana. We acknowledge and affirm the intrinsic relationship of Waikato-Tainui with our natural environment.
4. Waikato-Tainui have co-management/co-governance relationships through Joint Management Agreements with a number of Councils including Hamilton City Council.
5. Waikato-Tainui wish to be heard in support of their submission.

## WHAKATUPURANGA WAIKATO-TAINUI 2050

6. Whakatupuranga Waikato-Tainui 2050 is the strategic plan blue print for the cultural, social and economic advancement of Waikato-Tainui. Its vision is to grow a prosperous, healthy, vibrant, innovative and culturally strong iwi. Its mission is for the iwi to grow, prosper and sustain. Warm, safe and healthy homes for tribal members is a key outcome of the strategic plan.
7. WHAKATUPURANGA 2050 NGAA TOHU STRATEGIC FRAMEWORK 2050: Our people are successful in all areas of their lives: committed to Kiingitanga, fluent in te reo Maaori, strong in tikanga, healthy, well-educated, financially secure, environmentally conscious and socially sound. Waikato-Tainui supports the alignment of the Draft Policy to achieve the following strategic signposts.





## HOUSING

8. Housing affects lots of issues in our people's lives and those of our children, issues that are both financial and social. Home ownership and quality housing contributes to greater whaanau prosperity and wellbeing.
9. Waikato-Tainui has identified two areas that are important things for the tribe to address as part of the lives, futures and health of our tribal members.
10. Home ownership and ensuring our people live in warm, safe and healthy homes are the two most important areas where we can make a difference to the lives of our whaanau and generations to come.
11. Cold, damp homes and indoor pollutants contribute to the development of asthma and a host of other respiratory health problems including cancer. Substandard housing and crowded, cold, damp and mouldy homes, have been linked to poorer mental health and psychological distress.

12. Overcrowding is also associated with elevated rates of disease hospital admissions and the spread of diseases such as meningococcal disease, tuberculosis and acute rheumatic fever.
13. Key Waikato-Tainui housing work areas:
  - a. Home Ownership Workshops - Goal setting - starting the journey, looking at the market, dealing with banks and mortgage brokers, making an offer, settlement - moving in, further pathway options through Waikato-Tainui
  - b. Renovated Right of First Refusal Homes – The tribe will be enhancing the RFR housing purchase option by purchasing all homes under Waikato-Tainui, renovating them to a warm, safe and healthy standard and then selling them on to tribal member first home buyers.
  - c. Tribal Housing - Waikato-Tainui are planning to build tribal housing developments offering affordable houses specifically for tribal members. These developments will establish Waikato-Tainui tribal housing in areas with good schooling and employment i.e Jebson Place, Hamilton.
  - d. Papakainga Development - Supporting tribal members with their papakainga aspirations through Maaori Housing network assistance programmes.
14. Waikato Tainui is a strong supporter of affordable housing both for its own people and for the benefit of the more vulnerable members of society in Hamilton City. We consider that the draft Policy will assist Council to meet its obligations under the National Policy Statement on Urban Development Capacity and recognises that the current lack of affordable housing in Hamilton is adversely affecting the poor in our community along with shutting out first home buyers from getting a start in the housing market.
15. Waikato Tainui is already a social housing provider and is therefore taking a keen interest in both the formulation and implementation of this draft Policy.

## RECOMENDATIONS

16. Waikato-Tainui are generally in support of the draft Policy.
17. However, Waikato-Tainui strongly supports amendments to the draft Policy to provide for the following matters:
  - a. Affordable shouldn't be considered in terms of a smaller 'footprint' – small homes in a development only serves young, single or professional couples. Hamilton needs larger affordable family homes – the draft Policy needs to be strengthened to help those who need it the most.
  - b. The draft Policy talks about provision for CHP's to develop, but not all CHP's are housing builders or developers. It would be better to refer to provisions for developers and builders who are supplying housing for CHP purposes.
  - c. There should be some controls in terms of abuse from developers who would look to use SHA's as a way to further intensify and to maximize profit. There should be a link to the increase value of land (from the allowance of further intensification) and investment in social placemaking/community building over and above what a normal developer would provide - in other words if a development is applying for SHA you would expect an investment in the

community equal to the increase of value that would be obtained by way of the SHA provisions.

- d. The first clause in Schedule 2 states that All Special Character Areas (excluding Peacocke Terrace Area) will not be considered for the establishment of a SHA. We consider this exclusion to be inappropriate and fails to recognise that there may be development sites located within Special Character Areas that fit all of the other requirements for a SHA, and with further consideration are also appropriate under the provisions of that Special Character Area. By way of example, Waikato Tainui are currently working collaboratively on a project with Housing New Zealand Corporation (HNZC) to develop a site at 5A Cassidy Street, Hamilton East. Consent was granted by Hamilton City Council to HNZC (HCC consent number 011.2016.6314.001) on 8 March 2017 for this development. Waikato Tainui are now seeking to progress this development, albeit potentially in a different form and as such would like the opportunity for this site to be considered under the draft Policy because of its unique characteristics relating to it being owned by one landowner, being serviced and being landlocked by roading on three sides.
- e. Importantly, while this site is located in a Special Character Zone (being the Special Residential Zone), the Council's notification report concludes: "the existing development on the site does not display very many of the characteristics identified as being typical of the Hamilton East Area." Although this site is in a Special Character Zone, further investigation concluded that the zone wide characteristics did not apply to this specific site. In our view, this situation would not be unusual and would likely occur elsewhere around the city where the Special Character Area zone provisions are not necessarily demonstrated throughout the entire area and a blanket exclusion is unwarranted. Doing so would unfairly penalise sites that could provide SHA opportunities, particularly since the SHA process requires each site to be considered on its merits anyway.
- f. Our submission is that Schedule 2 – Areas not suitable for the establishment of SHAs, be amended to remove reference to All Special Character Zones and that the requirements of section A11 in Schedule 1 be amended to ensure that the relevant performance standards and assessment criteria in any Special Character Area can be met by the SHA proposal. This could be achieved by inserting the words: "or Special Character Zones" after the words; "General Residential" in the first line of criteria A11 in Schedule 1 of the draft Policy.
- g. The amendment recommended within this submission will ensure that the draft Policy promoted by Hamilton City Council will deliver quality, affordable housing in the city in a reasonable timeframe.

**DATED:**

10 July 2017

**WAIKATO TAINUI TE WHAKAKITENGA O WAIKATO INC**  
By its Environmental Manager;



-----  
Tim Manukau

**Address for Services:**

C/- Tim Manukau  
Waikato-Tainui Te Whakakitenga o Waikato Inc  
Private Bag 3344  
Hamilton

**Telephone:**

**07-858 0400**

**Fax:**

**07-839 2536**

**Email:**

[timm@tainui.co.nz](mailto:timm@tainui.co.nz)



## Proposed Housing Accord Policy

### **Do you have any supporting documentation you would like to include?**

Submission attached.

### Hearings and Contact Information

**Do you wish to speak in support of your submission at a Council hearing?** *If you don't want to speak at the hearing, but would like staff to know who this submission is from, you are welcome to fill in the Contact Details section.*

No

**Are you responding as:**

Not Answered

**What is your name?**

c/- Ben Inger, Harrison Grierson Consultants Ltd

**What is your organisation?**

on behalf of Nga Rau Tatangi Ltd

## Submission

# ON THE DRAFT HAMILTON SPECIAL HOUSING AREAS POLICY



**TO** Hamilton City Council

**SUBMISSION ON** Draft Hamilton Special Housing Areas Policy

**NAME OF SUBMITTER** Nga Rau Tatangi Ltd

**ADDRESS** C/- Harrison Grierson Consultants Limited  
Panama House, 15 Grantham St  
HAMILTON 3204  
Attention: Ben Inger

### SUBMISSION IN SUPPORT SUBJECT TO THE FOLLOWING

1. This submission on behalf of Nga Rau Tatangi Ltd (NRT) relates to the draft Hamilton Special Housing Areas Policy (the Policy). NRT (the submitter) supports the adoption of a Housing Accord Policy for Special Housing Areas. However, the submitter has some concerns regarding the content of the Policy, specifically:
  - The absence of a definition of 'Social Housing Provider' in the Policy;
  - Clause 15d: The pre-eminence afforded to the Hamilton City Partly Operative District Plan (PODP) in evaluating and selecting SHA sites;
  - Clause 16: The requirement that a proposal for a SHA may only be initiated following Council making a request for proposals;
  - Clause 22: The uncertainty regarding the process for consideration of a SHA, including the process and timeframes for public feedback to be sought;
  - Clauses 23 and 24: The mandatory requirement for a development agreement;
  - Evaluation Framework: The extensive details that are required as part of a proposal for a SHA under the Evaluation Framework, some of which would be best considered and addressed at resource consent stage;
  - Schedule 4: The requirement to assess proposals against various objectives and policies in the PODP.

### SUBMITTER DETAILS

2. NRT is a registered community housing provider. The purpose of NRT is to:
  - Assist in the development of social housing for the benefit of Maori and Pacific people;
  - To advance the wellbeing and economic autonomy of Maori and Pacific peoples through home ownership;
  - To advocate for quality and affordable homes for Maori and Pacific peoples;
  - To model effective collaborative ventures with multi-agencies, Government, government departments, community and civil bodies, individuals and business, in housing initiatives;
  - To provide affordable, sustainable and innovative housing options;
  - To provide proactive and responsive property and tenant management;
  - Promote a robust Maori and Pacific housing sector in Aotearoa.
3. NRT is currently developing a residential housing development in Enderley on a site that it owns which is approximately 2.3 hectares. The development will include a mix of social and affordable housing. The first seven homes have been constructed and are occupied. More homes are under construction and planned.
4. The submitter has a particular interest in the Policy due to its status as a registered community housing provider. The Policy is directly relevant to the Trust's key objective to promote affordable housing in Hamilton.

## DEFINITION OF SOCIAL HOUSING PROVIDER

5. Numerous provisions in the Policy refer to 'Private Housing Providers' (PHPs) and 'Social Housing Providers' (SHPs). The Policy does not define either of these terms. The Community Housing Regulatory Authority (CHRA) is a Crown authority which is part of the Ministry of Social Development. The CHRA is responsible for considering requests by organisations to become registered as a Community Housing Provider (CHP). They also provide assurance to the Government that registered CHPs are well governed, remain viable, and deliver appropriate housing services to their client group. The CHRA maintains a list of registered CHPs on its website.
6. To provide better certainty, the submitter requests that the following definition (or similar wording) should be included in the Policy for 'Social Housing Providers':
 

*“Social Housing Provider means either Housing New Zealand or a Community Housing Provider that is registered by the Community Housing Regulatory Authority.”*
7. A definition could also be included in the Policy for PHPs, which would refer to all developers other than SHPs.

## POLICY PRINCIPLES

8. The submitter supports the Principles in clause 14 of the Policy. In particular, the submitter supports the commitment in clause 14c that Council will work collaboratively with SHPs (and PHPs) to increase housing supply and opportunities for affordable housing.

## POLICY OUTCOMES AND SELECTION PROCESS

9. The submitter generally supports the Intended Policy Outcomes in clause 15 of the Policy.
10. Although the submitter supports the outcome in clause 15a, the submitter considers that the Policy does not create sufficient certainty to developer's who are considering pursuing SHA status to assist the development community to make investment decisions. The reasons for this are addressed later in this submission under the headings 'Policy Implementation Criteria' and 'Evaluation Framework'.
11. The submitter also has concerns with clause 15d which is to ensure that SHAs are generally consistent with and have regard to the relevant provisions of the PODP. This statement is not quantified by reference to any specific aspects of the PODP. This Outcome would negate some of the key potential advantages of the HASHAA process. If the PODP provisions are a key measure as part of the evaluation then developers are unlikely to gain many advantages by following a SHA route rather than pursuing a standard track resource consent under the normal PODP and RMA process.

## POLICY IMPLEMENTATION CRITERIA

12. Clause 16 sets out that proposals from landowners and developers seeking SHA status will be called for from Council from time to time at its discretion. The submitter requests that the Policy should have greater flexibility to enable a developer to initiate a request for a site to become a SHA at any time, rather than having to wait for Council to call for proposals. This would assist with fast tracking SHA processes by avoiding the potential for a developer having to wait with uncertainty for the Council to decide to allow requests. Allowing proposals to be submitted for consideration at any time would be more consistent with the Intended Policy Outcome in clause 15a.
13. Clause 22 outlines the process for detailed consideration of a SHA proposal, including seeking public feedback. The Policy is not clear how public feedback will be sought, nor does it specify any timeframes for public feedback or timeframes for the subsequent analysis of the proposals though to acceptance. This lack of detail creates significant uncertainty for developers and other interested parties which is inconsistent with the Intended Policy Outcome in clause 15a. The submitter requests that more detail is added into clause 22 so that the process is more transparent.
14. Clauses 23 and 24 set out that all proposals, once accepted in principle, will require a development agreement to be entered into between the developer and the Council. Development agreements are typically complex legal documents which are expensive and time consuming to negotiate and draft. For developments which are small in scale and/or do not require infrastructure upgrades, a development

agreement would not provide any benefits and would add unnecessary cost and time delay to the delivery of developments.

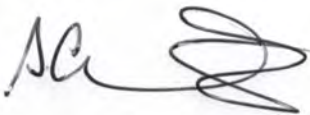
15. The submitter requests that the requirement for development agreements should either be removed from the Policy altogether or alternatively the Policy should be amended to clarify that the need for a developer agreement will be considered on a case by case basis depending on the nature of the proposal.

#### **EVALUATION FRAMEWORK**

16. The submitter is concerned that the Evaluation Framework is far too extensive such that the preparation of a proposal for a SHA is likely to be a time intensive and expensive task. This expense would need to be incurred by a proponent of a SHA without any certainty that the SHA will be recommended for approval by the Council. This creates significant uncertainty and risk for developers. This is particularly concerning given that the Applicant must meet the costs associated with the preparation of the proposal, which is likely to require expert assistance (from planners, architects and other professionals), as well as the costs of Council assessing the proposal, as set out in criterion A12. There is no guidance in the Policy to quantify what the Council costs might be.
17. The submitter requests that reconsideration is given by Council to the Evaluation Framework so that some of the matters are addressed at resource consent stage, rather than as part of the assessment of the SHA proposal. For example, criterion A11 requires that an Applicant for a SHA where the Applicant is seeking to adopt a more intensive form of Residential zone must demonstrate that the proposed development on the site can comply with the performance standards and can meet the assessment criteria in the PODP based on the new zone that would apply. This type of assessment would require a high level of detail of the proposal to be provided at the stage of SHA consideration. It would also require an Assessment of Environmental Effects to be carried out, which would ordinarily be undertaken at resource consent stage. Other problems with this criterion are the pre-eminence given to the PODP and the expectation that all relevant performance standards in it should be met, which is unlikely to be the case for most developments.
18. The submitter also requests that consideration should be given to making Council's costs that it will pass onto developers more certain. This could potentially be achieved by setting a processing fee or by Council liaising with developers to provide an estimate of costs.
19. The requirement in Schedule 4 to consider consistency with various PODP requirements also places significant emphasis on the PODP in assessing SHA proposals. The submitter is concerned that Schedule 4 affords too much weight to the PODP in determining SHAs which is likely to undermine the effectiveness of the Policy in achieving the principal objectives to increase housing supply and to improve affordability.

**Nga Rau Tatangi Ltd does not wish to be heard in support of its submission.**

Signed on 14 July 2017 by



Sharon Lambert  
General Manager – Nga Rau Tatangi Ltd

#### **Address for Service of Submitter:**

Nga Rau Tatangi Ltd  
C/- Harrison Grierson Consultants Limited  
Panama House, 15 Grantham St  
**HAMILTON 3204**

Attention: Ben Inger

**Telephone:** 07 925 0039

**Facsimile/email:** [b.inger@harrisingrierson.com](mailto:b.inger@harrisingrierson.com)

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## Proposed Housing Accord Policy

### Do you have any supporting documentation you would like to include?

Submission attached.

### Hearings and Contact Information

**Do you wish to speak in support of your submission at a Council hearing?** *If you don't want to speak at the hearing, but would like staff to know who this submission is from, you are welcome to fill in the Contact Details section.*

No

**Are you responding as:**

Not Answered

**What is your name?**

Keith Brown

**What is your organisation?**

Brown Construction

1. **About the Submitter**

- 1.1 My name is Ernst Keith Brown and I am the owner of approximately 7,608 m<sup>2</sup> of land on the corner of Horsham Downs Road and Borman Road which is zoned Business 6 under the Partially Operative Hamilton City Council District Plan.

2. **General feedback**

- 2.1 I appreciate the opportunity to provide feedback on the Draft Hamilton Special Housing Area Policy.
- 2.2 I support the intent of the Policy to enable the establishment of SHAs and enhance housing affordability. However, it is considered that the Policy could be more enabling and there are some limitations that need further consideration in Section 3 below.
- 2.3 I support the purpose of the Housing Accords and Special Housing Areas Act 2013 (HASHAA) to enhance housing affordability by facilitating an increase in land and housing supply in Hamilton.
- 2.4 I support the Housing Accord between Central Government and Hamilton City Council (the Council) and the establishment of special housing areas (SHAs) in Hamilton so as to enhance housing affordability.
- 2.5 I note that the HASHAA requires decisions on greenfield developments to be made within six months and decisions on brownfield developments to be made within three months. That compares with the standard system where it can take up to three years for a decision to be made. I support any streamlining of current processes to increase housing supply thus enhancing housing affordability.

3. **Specific Feedback**

*Principles*

- 3.1 I understand that one of the reasons for the government enacting the HASHAA and establishing SHAs is that existing planning frameworks under the RMA have had a significant impact in limiting housing supply and hence affordability.
- 3.2 It is considered that the Policy could be more enabling in this context, as it appears to place greater emphasis on the strategic direction set within the Partly Operative District Plan (PODP) rather than those matters which must be taken into account and weighted in accordance with Section 34(1) of the HASHAA.

*Policy Implementation Criteria*

- 3.3 Paragraph 16 of the Policy implies that developers will not be able to actively seek the establishment of SHAs but that the Council will call for proposals from time to time at their discretion. I would like the ability to be proactive and submit a proposal for the establishment of an SHA at any given time. The proposed approach could be quite restrictive in terms of allowing developers to respond to market demands in a timely manner.

*Schedule 1 – Framework for Evaluating SHAs*

A4 Locational Considerations

ERB.

- 3.4 The policy should encourage the use of lower order business land (i.e. land zoned Business 6) for SHAs particularly where there is existing mixed use development and in certain locations where business activities are no longer viable or supported by the catchment.
- 3.5 The policy should encourage the unlocking and conversion of landholdings that can be utilised for residential in the short-term thus unlocking the supply side over the next 1 - 5 years which is when most of the pressure will come in terms of supply given that the infrastructure for Peacocke and Rotokauri is unlikely to be in place before then.

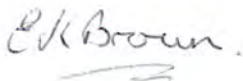
A6 Affordability and A8 Minimum Number of Dwellings

- 3.6 The requirement for a certain proportion of qualifying developments to compromise small subdivision allotment and/or dwellings to deliver more affordable housing is not supported by me. The primary purpose of SHA's should be to increase supply, not the provision of housing at particular price points. The market will dictate this and it is through increased supply that house prices will be moderated, not by policy criteria that limits lot sizes and/or only provides for certain types of houses. It is considered that the affordability criteria in A6 (a) – (c) should be removed from the Policy.
- 3.7 Both the private sector and the charitable sector play important roles in enhancing housing affordability and housing supply. There is no good reason in preferring one over the other. In particular, the Accord talks of a "well-functioning private sector led housing market".
- 3.8 The Policy draws a distinction between private housing providers and social housing providers (for example, there is no minimum number of dwellings threshold for Housing NZ or Registered Social Housing Schemes). I am unsure of the justifications for this distinction, particularly in the context of achieving the purpose of the HASHAA.
- 3.9 The Policy uses the term 'developers' in some places and the terms 'private housing providers' and 'social housing providers' at other places. I therefore suggest that the Council consider replacing the words 'private housing providers' and 'social housing providers' with 'developers'. We note the change will also be of benefit to the Council in the event the Council decides to convert land it owns to housing, and wants to take advantage of the fast-tracking process available for SHAs.

**4. Conclusion**

- 4.1 I support the purpose of the Housing Accords and Special Housing Areas Act 2013 (HASHAA) to enhance housing affordability by facilitating an increase in land and housing supply in Hamilton.
- 4.2 I support the intent of the Policy to enable the establishment of SHAs and enhance housing affordability. However, it is considered that the Policy could be more enabling as outlined in this submission.
- 4.3 I would welcome the opportunity to engage further with the Council on the issues raised in this submission, and also assist with further analysis of the Policy.

Yours sincerely



Ernst Keith Brown



## Proposed Housing Accord Policy

### Do you have any supporting documentation you would like to include?

Submission attached.

### Hearings and Contact Information

**Do you wish to speak in support of your submission at a Council hearing?** *If you don't want to speak at the hearing, but would like staff to know who this submission is from, you are welcome to fill in the Contact Details section.*

Yes

**Are you responding as:**

Not Answered

**What is your name?**

c/- Ian Johnson, Mitchell Daysh

**What is your organisation?**

On behalf of Fonterra Limited

# FONTERRA LIMITED

## COMMENTS ON THE DRAFT HAMILTON SPECIAL HOUSING AREA POLICY

---

**To:** Chief Executive  
Hamilton City Council  
Private Bag 3010  
Via email: [economicgrowth&urbanpolicy@hcc.govt.nz](mailto:economicgrowth&urbanpolicy@hcc.govt.nz)

**SUBMITTER:** FONTERRA LIMITED

**Address for Service:** Fonterra Limited  
C/- Ian Johnson  
Mitchell Daysh Limited  
PO Box 1307  
HAMILTON 3240  
  
**M** +64 27 281 4014  
**E** [ian.johnson@mitchelldaysh.co.nz](mailto:ian.johnson@mitchelldaysh.co.nz)

Fonterra Limited wishes to be heard in support of this submission.

I confirm that I am authorised on behalf of Fonterra Limited to make this submission.

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### 1. Background

- 1.1. The Housing Accords and Special Housing Areas Act 2013 (HASHAA) has been enacted as a short-term legislative response to an urgent need to address issues of housing affordability.
- 1.2. The HASHAA is intended to enable councils to promote Special Housing Areas (SHA) through consenting processes which sit outside of the normal framework of District Plan provisions, and notification processes prescribed in the Resource Management Act 1991 (RMA). In conjunction with the National Policy Statement on Urban Development Capacity (2016) (NPSUDC), the HASHAA is intended to increase housing supply to meet demand.
- 1.3. Hamilton City Council (Council) has signed a Housing Accord with the Government designed to ensure the delivery of 1,300 consented dwellings in 2017, 1,400 consented dwellings in 2018 and 1,500 consented dwellings in 2019. The Council's Draft Special Housing Area Policy (Draft SHA

Policy) aims to establish a process and evaluation criteria in respect of the identification or acceptance of proposals for SHAs.

## 2. Fonterra's Position

### Need for the Policy

- 2.1. Fonterra acknowledges the importance of ensuring an adequate supply of affordable homes to support the continued growth and well-being of the wider region.
- 2.2. Fonterra also supports the intention of the NPSUDC that Council's should ensure the continued supply of business land to sustain residential and economic growth. Currently, the immediacy of the HASHAA, and the targets agreed through the Hamilton Housing Accord, are such that the focus is currently on housing land matters rather than the twin objectives of the NPSUDC.
- 2.3. In that regard Fonterra **supports** the adoption of a specific Special Housing Area Policy to provide clarity regarding the evaluation criteria that will be used to determine whether a proposal for a Special Housing Area is to be accepted and supported.

### Consistency with the Strategic Planning Framework

- 2.4. Fonterra notes that the Draft SHA Policy refers to the need to ensure consistency with the strategic planning framework. The framework is recognised within the Hamilton Housing Accord as being the Hamilton Urban Growth Strategy, the Future Proof Strategy, and the Waikato Regional Policy Statement. The Accord also identifies that strategic direction is also set out within the Strategic Agreement on Future Urban Boundaries between Hamilton City and Waikato District. In general terms the strategic framework aims to position Hamilton City as a place that people want to live, work and play in. The identification of defined urban limits, strategically important employment nodes, intensifying development around the central city and other business centres and reducing dependency on cars are all key elements of the strategy.
- 2.5. The Partly Operative District Plan gives effect to the strategic framework and identifies zoning provisions that provide for growth. Despite the very recent origin of the targets set within the Hamilton Housing Accord, Fonterra notes that the Council is currently on track for achieving its target of 1,300 consented dwellings in 2017.<sup>1</sup> It appears that the market is responding positively to the shift in direction that has been established through the strategic planning framework.

### Te Rapa North

- 2.6. Fonterra's principal North Island Manufacturing Site (Te Rapa Site) is located within the Te Rapa North Industrial Zone. The Te Rapa Site was originally established in 1967 when the surrounding area consisted principally of agricultural production land, which provided a substantial buffer from urban areas. Over time the extent of the buffer has been progressively reduced through urban and rural residential growth. As a result, district plan provisions have progressively introduced controls over activities at the Te Rapa Site. While Fonterra takes all reasonable steps to avoid, remedy or mitigate its adverse effects, it is not possible to entirely internalise the effects of such a substantial operation without affecting production capacity and performance (to the detriment of the Waikato region). For example, while the Te Rapa Site operates under planning controls that require the setback of activities from the site boundaries, the noise effects arising from the site extend beyond the site and Fonterra is required to ensure compliance at a defined contour located beyond the site boundaries (rather than at the boundary).
- 2.7. In 2004, in response to mounting pressure to identify a long-term land supply for City growth, Hamilton City Council and Waikato District Council undertook consultation on potential district

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<sup>1</sup> HCC Growth and Infrastructure Committee Agenda 20 June 2017 (Para 130)

boundary changes, which included land at Te Rapa North (known as site HT2). Fonterra did not oppose the proposal on the basis that it provided for the land to be developed for industrial purposes. Industrial land use was considered to be compatible with the ongoing operation of the Te Rapa Site. The entirety of the HT2 area was formally brought into Hamilton City in 2010 and zoned for industrial purposes.

- 2.8. Continuing this direction, the Future Proof Strategy and the Waikato Regional Policy Statement have both set out policy support for the protection of regionally significant industries. Both policy documents specifically identify the Te Rapa North locality as a Strategic Industrial Node, elevating its importance above general industrial land supply.
- 2.9. This integrated planning framework has enabled Fonterra to commit to major expansion of production activities at the Te Rapa Site. Fonterra owns additional land in the Te Rapa North Industrial Node that is intended for future development of dairy-related industrial activities. Fonterra's concern is to ensure that the delivery of additional housing land through the SHA process does not compromise the robust planning strategy applying within the Te Rapa North Industrial Node.
- 2.10. Importantly, Fonterra's planning strategy extends beyond matters of land zoning. It includes decisions regarding the standard of infrastructure provided to the locality, in particular the form and function of transportation infrastructure. In this regard, decisions regarding the capacity and design of the Waikato Expressway (Te Rapa Bypass), and the ongoing management of the Te Rapa Road corridor have all assumed the full development of the HT2 area for industrial purposes. As part of this strategy, Fonterra has accepted restrictions on the use of its own grade separated interchange to Te Rapa Road, to ensure that capacity remains available for the development of the wider node for industrial growth. Proposals which reduce the capacity for industrial growth by utilising the strategic land resource for alternative purposes, or by reallocating transport capacity to other uses would fundamentally undermine this established planning strategy and should be avoided.

### **Sustainable Housing Areas**

- 2.11. While Fonterra acknowledges that the purpose of the Draft SHA Policy is to increase the supply of land for housing, Fonterra considers it essential that such development achieves the outcomes embodied within the strategic planning framework. To do otherwise would be to establish a legacy of poorly located residential areas with communities isolated from essential services and facilities.
- 2.12. Criterion A4 of Schedule 1 to the Draft SHA Policy sets out locational considerations that will form part of the evaluation of a proposed SHA. While it signals that proposals outside of the existing Residential Zones will require additional justification than those within such zones, the range of criteria against which a proposal will be considered are limited and high level. Criterion A11 provides some additional information requirements in terms of connectivity with adjoining zones and the transport network, however, it does little to establish clear expectations of what will be acceptable.
- 2.13. There is a high likelihood that SHAs will be proposed outside of existing Residential zones. Accordingly, the Draft SHA Policy's criteria need to be expanded to provide clear expectations as to the circumstances required to achieve the development of a sustainable residential community. Currently the central focus of the criteria is that a SHA must be capable of being serviced. The criteria provide very limited guidance in terms of the anticipated needs of future occupants. There is little, if any, recognition of what future residents would expect for them to be able to regard a SHA as an attractive housing option.
- 2.14. Fonterra recognises that the Hamilton Housing Accord anticipates that the identification of SHAs may involve land not currently zoned for residential purposes. Fonterra accepts that this could include land currently zoned for industrial use, and agrees that such an approach may be appropriate where such land is already well related to established residential communities and is well served by infrastructure, facilities (such as education and local shopping facilities) and amenities (such as reserves) that have the potential to support additional residential development. Fonterra considers that these are core principles that are essential to the delivery of sustainable housing areas.

However, SHAs in industrial areas that are not related to established residential communities and well served by infrastructure, facilities and amenities should be avoided.

### **Specific SHA Evaluation Criteria**

#### *Identifying areas where SHAs are inappropriate*

- 2.15. Although the Draft SHA Policy requires proposals to demonstrate consistency with the 'strategic planning framework', it provides no guidance on what this means. It appears that this reference is intended to include the full suite of strategic planning documents (including the Hamilton Urban Growth Strategy, the Future Proof Strategy, and the Waikato Regional Policy Statement) as well as specific areas or locations identified in the Partly Operative District Plan where a SHA proposal is inappropriate.
- 2.16. The specific provisions of the Partly Operative District Plan have been included in Schedule 2 of the Draft SHA Policy, which identifies a list of specific areas where SHA proposals will be rejected. These areas are all defined on the District Plan planning maps. Given the direction in the broader strategic planning framework and the Partly Operative District Plan that residential development within the Te Rapa Site's Noise Control Boundary is inappropriate, Fonterra considers that Schedule 2 should be amended to include the area contained within the Noise Control Boundary. The strategic planning framework is clear that this is an unsuitable area for residential development based on the need to avoid reverse sensitivity effects on Fonterra's regionally significant site.

#### *Identifying essential prerequisites for residential development*

- 2.17. In terms of identifying appropriate locations, Fonterra considers that the Draft SHA Policy should clearly identify matters that would be regarded as essential prerequisites of any proposal for new residential development. Where these requirements are not met, Fonterra considers that it is necessary for the Draft SHA Policy to clearly signal that such proposals will be rejected.
- 2.18. In this regard, the starting point for any definitive list should be that a proposed SHA is located within a 1km radius of an existing school, neighbourhood centre (Business Zone 6) and public transport route. In terms of meeting the need for affordable housing, it would be counter intuitive to enable the establishment of new housing areas that necessitated increased levels of private mobility and travel to reach everyday facilities. Examination of the existing pattern of development within the City indicates that the vast majority of residential development achieves this level of proximity and service.
- 2.19. Such amendments would substantially improve the clarity of the Draft SHA Policy and would provide more effective screening of proposals to ensure that resources are focussed on those areas which are capable of delivering sustainable and liveable communities. The amendments would not replace the existing requirements of the Draft SHA Policy in respect of the strategic planning framework but would establish clear measures to ensure that any proposed area would be served by at least a basic level of community facilities. This would support the Council's objective of promoting more consolidated patterns of residential development which will also contribute to achieving other objectives of the strategic planning framework, such as increased patronage of public transport networks. The success of the Council's initiative to promote increased infill development, particularly within and around the Central City, demonstrates that the market is capable of responding to such opportunities.
- 2.20. Furthermore, the recent announcement that many of the Auckland SHAs have been disestablished demonstrates the importance of identifying clear prerequisites for SHA approval. This will prevent ratepayer money being spent identifying SHAs now, which may never be sustainably developed.

#### *Effects on zoned industrial and business land*

- 2.21. Fonterra recognises that criterion A4b requires consultation with neighbouring industrial activities and that reverse sensitivity effects are addressed. However, the scope of this appears to be confined to existing activities rather than the potential for such activities to occur on land that has been

specifically zoned for industrial purposes. Zoned industrial land is a critical element in the regional strategy to ensure continued economic growth. Industrial land has more exacting requirements in terms of location and access to infrastructure, services and resources and it cannot easily be replaced. Unlike residential activity, there is restricted opportunity for the intensification of business activity. The protection of strategically important industrial land is therefore critical. Fonterra considers that the scope of criterion A4b should therefore be expanded to include assessment of implications for zoned industrial land, in addition to existing industrial activities.

- 2.22. While Fonterra recognises that criterion A4c refers to the importance of providing employment land, Fonterra notes that the Draft SHA Policy is likely to be adopted well in advance of any review of the available land supply under the terms of the NPSUDC. It is therefore necessary to ensure that a conservative approach is taken in advance of the conclusion of the review.

*Clarification of consultation requirements*

- 2.23. Fonterra supports that criterion A4b requires consultation with established land uses in existing and adjoining zones. However, Fonterra considers that additional clarity could be provided as to the extent of consultation required, to ensure that all potentially affected land uses are appropriately consulted with.
- 2.24. Given the potential for significant effects on existing landowners in an industrial zone from the establishment of SHAs, it is necessary to cast the consultation obligations broadly, so that all affected landowners are consulted with.

**Proposed Amendments**

- 2.25. In the context of the above comments, Fonterra considers that Schedule 1 of the Draft SHA Policy requires amendment to include the following additional references:

Criterion A4a is followed by a new criterion to read:

**aa. Proposals for SHAs shall meet the following requirements in respect of the proximity of key community facilities:**

- **Residential dwellings shall be within 1km radius of an existing school, neighbourhood centre (Business Zone 6) and public transport route.**

Criterion A4b is amended to read:

*Consideration of proposals in non-residential zoned areas under the PODP such as the industrial zone will be required to have provided evidence that they have consulted with, addressed reverse sensitivity and materiality of effect on established land uses in both existing and adjoining zones **(including consulting with all landowners that may be affected, beyond adjacent or adjoining land). The proposals are also required to provide evidence that they have addressed the implications for the future development of non-residential zoned land for its intended purpose.***

- 2.26. Schedule 2 of the Draft SHA Policy requires amendment to list the following as 'Areas that are not suitable for the establishment of SHAs':

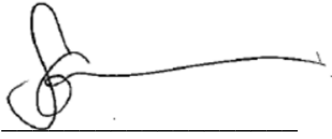
- **Land within the identified Noise Control Boundary relating to the Fonterra Manufacturing Site; and**
- **Land within 250m of an activity operating under an air discharge consent.**

- 2.27. Schedule 3 of the Draft SHA Policy requires amendment to read:

**In respect of transportation impacts, Council will need to be satisfied that, in addition to the availability of capacity within the road network, the proposed use of the network by residential traffic (including walking, cycling and vehicular traffic) is compatible with its use in**

**association with other activities in the locality, with particular reference to potential conflict with heavy vehicles.**

Dated: 14 July 2017

A handwritten signature in black ink, consisting of a large, stylized initial 'S' followed by a long, horizontal stroke that tapers to the right.

Scott Nelson  
**Te Rapa Operations Manager**  
FONTERRA LIMITED

## Proposed Housing Accord Policy

### Do you have any supporting documentation you would like to include?

Submission attached.

### Hearings and Contact Information

**Do you wish to speak in support of your submission at a Council hearing?** *If you don't want to speak at the hearing, but would like staff to know who this submission is from, you are welcome to fill in the Contact Details section.*

Yes

**Are you responding as:**

Not Answered

**What is your name?**

c/- Mark Tollemache

**What is your organisation?**

On behalf of Ma Development Enterprises Ltd and Green Seed Consultants Ltd



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## **Submission on the Draft Hamilton Special Housing Areas Policy**

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**To:** The Chief Executive  
Hamilton City Council  
[economicgrowth&urbanpolicy@hcc.govt.nz](mailto:economicgrowth&urbanpolicy@hcc.govt.nz)

**Name of submitter:**

Charles Ma, Green Seed Consultants Limited and Ma Development Enterprises Ltd.

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**Introduction:**

1. This is a submission on the Draft Special Housing Area Policy 2017.
2. It provides a background to the experience of the submitter, its intentions in respect to the Special Housing Area (SHA) Policy, and its interests in respect to land in the north-western corner of the Rotokauri Structure Plan.

**Background of Ma Development Enterprises and Green Seed**

3. Ma Development Enterprises Ltd is the lead company in the development of the Auranga ([www.auranga.co.nz](http://www.auranga.co.nz)) housing project involving 84 ha of land west of Drury in Auckland. This is zoned to provide 1350 houses. We have recently lodged with Council the first Private Plan Change to the Unitary Plan to rezone an additional 83 ha to support the development of a further 1300 houses on ongoing land.
4. Auranga was recently rezoned and consented as part of the Auckland tranches of SHAs. Our firm, along with its allied partners, investors and consultants has been involved in 25

qualifying developments and 7 SHA-based private plan change requests. As a consequence we have a depth of experience with the Housing Accords and Special Housing Areas Act (HASHAA), along with the provision of major trunk infrastructure to new greenfield locations at our cost.

5. In addition, we have been involved in the recent development of Sugartree apartments in Auckland (686 units) and the development of 400 lots and houses in Flat Bush.
6. In Hamilton our group has been purchasing land in the north-western corner of the Rotokauri structure plan area (approx. 60 ha secured at present). The original intention was to seek a private plan change request under the RMA when the opportunity arose. However, with the recent Hamilton Housing Accord we see an opportunity to rezone and develop that land at a pace that, put simply, the RMA cannot currently deliver. From our experiences of HASHAA and SHAs in Auckland, we are firm believers in its benefits of such an approach and have practical experience in its use and application.
7. We will be requesting in due course that our land in the north-west of the Rotokauri structure plan is identified as an SHA and will work with the Council to satisfy the requirements of this Policy.
8. We are also strong advocates for HASHAA's focus on housing supply and affordable housing, with Auranga having a stated public commitment to deliver a range of housing opportunities and price points beyond the minimum statutory requirements. In Auranga, developing a strong and vibrant community is key. It has the scale of a new neighbourhood with its own local centre and primary school. We have all seen the monoculture of suburbs with the same 4 and 5 bedroom houses, and price points which make it difficult for many to own a home. In Auranga, we are delivering 25% of the product at a size of three bedrooms or less, and voluntarily providing a total of 15% of homes at the Auckland affordability standard.

### **Hamilton's Housing Accord**

9. We applaud Hamilton City Council in its focus in the Policy on house size and the number of bedrooms. Both housing supply and a diversity of housing types are the key things that developers can deliver in bulk, and the focus on a range of housing types is the key ingredient to create diversity in our communities.

10. We are keenly interested in the potential of the Hamilton Housing Accord, and wish to work with Council to ensure its success. There are a number of matters we wish to comment on and seek clarification in the Policy. While this is where the so called 'rubber hits the road', the intention is not to detract from the support we have for Hamilton's approach, but rather to clarify or strengthen elements based on our recent experiences.

**Submission:**

11. The submitter makes the following comments on the draft Policy.

*14(f) Principles*

12. It is noted that the text in this principle should be consistent with section 16(3) of HASHAA, in that "adequate infrastructure to service qualifying developments in the proposed SHA either exists **or is likely to exist**" [emphasis added]. The submitter agrees with the principle for infrastructure connections with the Council's strategic infrastructure networks. It also notes that there may be cases, for example at Rotokauri, where road networks would be integrated with the State Highway, stormwater would be developed as part of qualifying developments and that at the time of identifying an SHA, infrastructure may not be present for immediate connection, but can be planned for as part of a Plan Variation and/or qualifying development.

*14(g) Principles*

13. The submitter supports the approach of the principle however given the definition of infrastructure in schedule 3, which includes infrastructure not provided by Council (eg. school), the focus should be on specific reticulated networks and/or local roading. In addition, as parks and reserves are identified in schedule 3, the principle of providing these at no cost as outlined in Principle 14(g) would be inconsistent with Council's obligations under the Local Government Act in respect to recreation reserve acquisition. It maybe that this is unintended, and that a definition of strategic infrastructure networks focussed on reticulated networks and roads could resolve this.

*18 Policy Implementation Criteria*

14. The submitter acknowledges that there are fundamental elements of housing supply and affordability to HASHAA, and minimum requirements are set by the statute. The wording of paragraph 18 requires mandatory and discretionary criteria to be satisfied. The context of mandatory criteria is understood and accepted. However, discretionary criteria require a judgement, and, in many cases, an overall judgement, to be formed on the basis of weighting often competing factors. The submitter seeks acknowledgement in the policy that an overall judgement will often be necessary for discretionary criteria, and that in some circumstances meeting all of them will not be possible.

*A1 Demand for a Qualifying Development*

15. The Policy should recognise that the SHA may be identified to support the rezoning of land within structure plan areas to a residential zone from the current rural zone. In this sense, the appropriate outcome is a parallel private plan change (plan variation) process with the first qualifying development. Therefore, having a test of the policy to achieve new housing within one year of the declaration of SHA status may significantly favour small qualifying developments rather than the more larger strategic rezoning of land. This is because this land must also go through a private plan change process, along with providing infrastructure to connect to sites and constructing onsite civil engineering to support subdivision, from which the housing will follow. Therefore, the criteria needs to reflect the scale of the proposal and the necessary sequences to achieve the construction of housing. Otherwise it is likely that many SHAs which rely on plan changes may not be able to achieve this criteria within the set timeframe.

*A6 Affordability*

16. The submitter supports the Council's approach to affordability and, based on its experiences with SHAs in Auckland, makes the following comments:
- i. For SHAs involving private plan change requests, criteria a. and b. should become rules which will govern subsequent resource consent applications.
  - ii. The two bedroom requirement of clause a. does not match with the 150 m2 GFA limit. It may be better to require three bedrooms or less, which supports a broad range of housing opportunities, particularly for first home buyers. Houses limited to two bedrooms may only have utility for specific sectors of the market, for example empty nesters.
  - iii. In respect to clause d., the focus on our most recent experience in Auckland with affordable housing is that subdivision also needs to provide for purchasers to add to the dwelling and evolve it over time. Modular housing that can be extended by the landowner is an important contributor to people being able to get on the property ladder. As the family grows they add a bedroom or other space to suit their needs, rather than having a house that can't be changed. The covenants need to recognise that while a modest-sized house could be constructed at first, that the new landowner's circumstances may change (for example the birth of children), and that this may necessitate new rooms being constructed as finances/circumstances apply. The covenants should not be so restrictive that houses are locked into a size of 150 m2 GFA in perpetuity. In addition, the nature of Council's expectations of the covenant should be outlined in this policy to establish certainty.
  - iv. The principle of clause f. is supported, however in Auckland the development of housing in partnership with a social housing provider was elusive. My discussions with Auckland Council is that only one private sector development with the involvement of a social housing provider was realised, and in that case the developer had a pre-existing and longterm relationship with the provider through their charitable trust. My direct engagement in Auranga with the social housing providers did not result in any confirmed agreement in respect to Auckland's

approach to this matter. To achieve such an outcome requires a full time and dedicated broker to bring the parties together. Making clause f. and g. a requirement may not be realistic where market demand is such that the 20% of allotments being less than 350 m2 can easily be achieved with development, and the market will respond favourably to this product and price point.

#### *A9 Design Quality*

17. Where the Council has confidence in its ability to consider qualifying development through assessment against the District Plan, it is unnecessary to have this criteria in the policy. This infers that fully developed proposals need to be provided for sites to be considered as SHAs. This is not efficient, and the process of assessing the qualifying development will always be based on the District Plan.

#### *A11 Determination of Appropriate Residential Zone Provisions*

18. The intent of the policy is understood, however with an effects based plan it needs to be recognised that proposals are highly likely to trigger a wide range of rules and performance standards. For example, higher density proposals require additional building coverage to be successful, as by definition they are seeking to accommodate higher than standard suburban densities and development in a specific site. The requirement to demonstrate compliance with the rules prior to being considered as an SHA puts the cart before the horse, and the struck out text which seeks that proposal have regard to a range of matters is a better way to evaluate whether an SHA on that land is appropriate or not. The detail of the design and the extent of potential infringements is a matter for the assessment of the qualifying development.

#### *Schedule 3 Infrastructure Requirements*

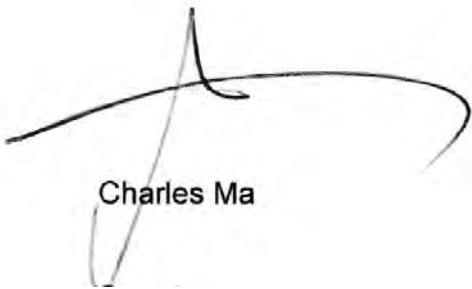
19. Clause b. does not recognise that the acquisition of reserves is governed by the Local Government Act, and where reserves are required for recreation purposes (but not drainage or utility purposes), that compensation should be provided. The proposed criteria of no cost associated with reserves may not be fair or reasonable in the case of greenfield areas where Council, through structure planning, has already identified opportunities for future reserves. The criteria should be rethought, or at the least referenced to the requirements of the Local Government Act and apply a discretion. The obvious worst case scenario is that in a large greenfields scenario Council imposes a requirement on a development to provide a large suburban park, say at 3.5ha in size, as part of the SHA at no cost. It is accepted that reticulated networks should be at no cost, although where for strategic reasons Council wants to upsize pipes for long term benefit, then contributions in the normal manner would be applicable. At present the criteria does not seem to have discretions to address the normal practices associated with land development.
20. Our observation in Auckland is that where SHAs failed, the land was not owned or controlled by developers. Many SHAs were created over land where investors and landowners (the mum and dad type) didn't have the funds to develop private plan

changes, prepare qualifying developments or develop infrastructure. Where a developer found themselves within a SHA with landowners they had to coordinate with, it usually resulted in a single party having to shoulder the burden of funding consents and infrastructure without contribution of others. Consequently either SHAs didn't develop in Auckland or developers paid unreasonably high costs in proportion to their development because of 'freeloaders'. The Policy should clearly state that only parties that are willing to make the required commitments would have land identified as an SHA, and third parties or 'me toos' who are unwilling to do so should be excluded.

21. Thank you for this opportunity to provide feedback on the draft policy.
22. The submitter wishes to be heard in support of this submission.

Signature:

FOR THE SUBMITTER



Charles Ma

Address for Service:

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Green Seed Consultants Limited  
and Ma Development Enterprises Ltd

Auckland

Date: 14 July 2017

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MA DEVELOPMENT ENTERPRISES

## The MADE Story: summary

### Visual summary - The layers of our story

In the same way that a township Master Plan has many layers of complexity that contribute to its end goal and plan, so the story of MADE has a number of dimensions and the ripples that flow from its intentions.



### Charles Ma - Fostering meaningful connections

Charles Ma is a New Zealander of Chinese descent, born in Auckland as the fourth of five children. He is the founder/CEO of Ma Development Enterprises (MADE) and his vision for MADE is an intensely personal one, emanating from his desire to add to human worth by creating places that foster and share social equity.

Charles adheres to a set of deep-seated values, including respect, positivity, faith and humanity. In a world of separation, where lack of human contact is increasingly common, Charles aims to pull the other way: to reconnect people, providing opportunities to reach their potential.

“People are lonely, lacking meaningful connections. I have built multiple successful large-scale property projects, projects that have compelled me to think deeply about the cost of disconnection and the need for meaningful connections” Charles Ma

Charles has over \$1.07bn of development completed (ranging from niche rural lifestyle to large scale CBD apartment developments) and \$2.9bn currently in progress. The current flagship project is an 84.6 hectare, 1350+ dwelling development in Auckland, with planned growth to deliver 8000 – 10,000 homes. MADE is also in the process of establishing its next large town development in the city of Hamilton, 2 hours from Auckland.

## Ma Development Enterprises (MADE) - The heart that creates

MADE was formed to enable consistency of vision and scalability across a number of ventures, supporting delivery at pace. It is designed to be a different kind of business; instead of short term commercial outcomes and the hardware of a place, MADE focuses on the software, people, and long term social outcomes.

While founded on solid business principles and real estate management expertise, it also applies different engagement, business and funding models.

It replicates the principles of community in its collaborative approach to all stakeholders, including funders, Government, education, healthcare, commercial and community.

## Portfolio – Building communities with heart

MADE is highly ambitious for the people who live in the places it builds and its large-scale property projects are designed with conscious intent to be sustainable and create “communities with heart”.

MADE’s walkable, mixed use developments offer a sense of belonging, choice and opportunities. They are a model for sustainable townships, where the community has access to jobs, transport options and a safe, healthy environment; well supported by public services and infrastructure.

## Wellbeing - A fuller way of living

MADE developments aspire to prioritise, promote and share social equity as a means of providing for community wellbeing. They encourage community co-creation and growth of social (and economic) infrastructure along with meaningful personal and communal connections.

These helps grow the heart of the community and provide an experience that is fulfilling for those who live there.

It is MADE’s belief that people want a fulfilling life at home in their community, the goal is to make that a real lifestyle option for them in a walkable, mixed use development.

## Change – A giving flourishing future

MADE is an engine for change and aspires to help make the world a better place through the strong fulfilled communities that live in its developments. Its business approach is a model for the future in which property development is so much more than building houses.

Higher individual wellbeing in a community with heart will, MADE believes, encourage a higher level of support and ‘give back’ from members of the community.

“It is my aim to show that it is possible to do things differently and re-think the industry. Many people challenge my approach and are cautious about the level of risk I am taking. In five years they will have seen me succeed enough times to be shifting their thinking and, hopefully, joining my vision to create communities with heart.”

Charles Ma



## PROFILE: Charles Ma

Chief Executive Officer of Ma Development Enterprises

[www.made.co.nz](http://www.made.co.nz)

Manging Director of Auranga

[www.auranga.co.nz](http://www.auranga.co.nz)



### Introduction

Charles Ma is a New Zealander of Chinese descent, born in Auckland as the fourth of five children. He is the founder/CEO of Ma Development Enterprises (MADE) and his vision for MADE is an intensely personal one, emanating from his desire to add to human worth by creating places that foster and share social equity.

Charles adheres to a set of deep-seated values, including respect, positivity, faith and humanity. In a world of separation, where lack of human contact is increasingly common, Charles aims to pull the other way: to reconnect people, providing opportunities to reach their potential.

*“I recognise that I am younger than many people who run such large ventures. However, I believe my youth is a significant advantage, as I bring a fresh perspective and have a level of freedom to be creative and flexible in my approach.*

*I have the privilege to lead a team of successful professional partners and have a number of highly experienced, extremely capable advisors to support me, along with a prominent Executive Coach (Katia Verresen) in the US who specialises in coaching entrepreneurial leaders and global game changers.” Charles Ma*

### Credentials

Charles has over \$1.07bn of development completed (ranging from niche rural lifestyle to large scale CBD apartment developments) and \$2.9bn currently in progress. The current flagship project is an 84.6 hectare, 1350+ dwelling development in Auckland, with planned growth to deliver 8000 – 10,000 homes. MADE is also in the process of establishing its next large town development in New Zealand.

His academic achievements include co-joint undergraduate degrees in Civil Engineering and Commerce achieving Honours; he has kept up to date with the latest thinking in leadership and management.

Charles continues to be involved, as an alumnus, in the University of Auckland Dean’s Leadership Programme for Engineering. This involves him assisting in the development of undergraduate students by providing internship opportunities, mentoring, workshops and guest speaking opportunities.

In 2014 Charles co-authored a global chapter, “New Zealand – new directions for construction R&D”, published in “R&D Investment and Impact in the Global Construction Industry”.<sup>1</sup>

He has spoken as a guest speaker in forums such as the Mayor Taskforce forum (where leaders in the industry advise the Mayor on housing issue in Auckland), the New Zealand Affordable Housing Development Summit (Aventedge), and been invited to speak at the Social enterprise world forum 2017.

His passion about pursuing excellence drives him to learn from others and read prolifically. As part of his continual executive education he studied at Stanford University Graduate School of Business and London Business School.

<sup>1</sup> Edited by Keith D Hampson, Judy A Kraatz and Adriana X Sanchez

## Proposed Housing Accord Policy

### Do you have any supporting documentation you would like to include?

Submission attached.

### Hearings and Contact Information

**Do you wish to speak in support of your submission at a Council hearing?** *If you don't want to speak at the hearing, but would like staff to know who this submission is from, you are welcome to fill in the Contact Details section.*

No

**Are you responding as:**

Not Answered

**What is your name?**

Greg Morton

**What is your organisation?**

Waikato Regional Council

File No: 22 12 05  
Document No: 10774669  
Enquiries to: Greg Morton

Date 13 July 2017



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C/- Urban Policy Team  
Hamilton City Council  
Private Bag 3010  
Hamilton 3240

Dear Sir/Madam

**Waikato Regional Council submission on Hamilton City Council's Draft Special Housing Areas Policy**

Thank you for the opportunity to make a submission on Hamilton City Council's draft Special Housing Areas Policy. Please find attached Waikato Regional Council's submission regarding this document. The submission is a staff submission response.

Should you have any queries regarding the content of this document please contact Greg Morton, Senior Advisor, Growth Management and Infrastructure directly on (07) 859 2727 or by email at [greg.morton@waikatoregion.govt.nz](mailto:greg.morton@waikatoregion.govt.nz).

Waikato Regional Council does not wish to speak in support of this submission.

Regards

Tracey May  
**Director Science and Strategy**

## Submission from Waikato Regional Council on Hamilton City Council's Draft Special Housing Areas Policy

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### Introduction

- 1.1 Waikato Regional Council (the council) appreciates the opportunity to make a submission on Hamilton City Council's Draft Special Housing Areas Policy (the draft policy).
- 1.2 The council **notes** that Hamilton and its surrounds has been experiencing strong housing, job and economic growth over the past three years. As one example, there has been a continual rise in consents for residential dwellings in Hamilton in response to demand which is putting pressure on timely housing provision, and housing affordability in the city.

As a Future Proof partner, the council is committed to working with Hamilton City Council and other Future Proof partners to manage growth in an effective and coordinated manner across the sub-region. Hamilton City Council has a key role in this respect, with Hamilton likely to experience 60-70 percent of total residential housing development demand across the sub-region over the next 30 years<sup>1</sup>.

- 1.3 This submission provides general support for the draft policy, with a particular focus on matters of strategic interest to the region and to council: integrated growth management, the Future Proof settlement pattern set out in Section 6 of the 2016 Waikato Regional Policy Statement (Waikato RPS) and regional development. We **note** that regional development is an identified priority in council's strategic direction 2016-2019.

### General comments

- 2.1 The council **generally supports** the purpose of the draft policy, which is "to establish the process and evaluation criteria that will guide [Hamilton City] Council in making decisions on whether to accept a proposal for a Special Housing Area and recommend to the Minister that a proposed Special Housing area be established" (paragraph 13).
- 2.2 The council **supports** the inclusion of principles and intended policy outcomes in the draft policy which aim to ensure that Special Housing Areas are well integrated into Hamilton City Council's existing and planned infrastructure networks, and priority is given to the establishment of Special Housing Areas that are consistent with the strategic direction set within the Partly Operative Hamilton City District Plan (PODP).

The council supports the Future Proof Strategy 2009 which guides growth management planning and implementation across the Future Proof sub-region. The Future Proof Strategy is recognised in the Waikato RPS (Policies 6.3 and 6.13-6.19; and sections 6A-6D).

The Future Proof Strategy Update 2017 identifies guiding principles which underpin the strategy and its implementation. The council **notes** the alignment between some of the draft

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<sup>1</sup> Draft Future Proof Strategy Update 2017

policy's principles and those identified in particular Future Proof guiding principles under 'Diverse and vibrant metropolitan centre linked to thriving towns and rural communities and place of choice –Live work, play, invest, and visit' and 'Affordable and sustainable infrastructure' in the Future Proof Strategy Update 2017 (section 1.3).

2.2 The council **supports** the provisions in the draft policy that:

- Refer to the National Policy Statement on Urban Development Capacity, as this will help ensure there is sufficient feasible development capacity, along with key infrastructure requirements provided for within Hamilton City. We **request** that these provisions be retained.
- Identify key matters related to the promotion or protection of the agreed settlement pattern for the Future Proof sub-region as outlined in section 6 of the Waikato RPS. Example include: strategic land use planning such as identified industrial nodes for the Waikato region, and the need to provide infrastructure to ensure integrated land use and infrastructure planning. We **request** that these provisions be retained.
- Require consistency with the strategic land use planning direction set out in the PODP, as this will assist with ensuring that effect is given to the requirements of statutory plans including the provisions of the Waikato RPS related to the built environment section (section 6). We **request** that these provisions be retained.
- Seek to ensure that SHAs do not compromise or undermine Hamilton City's existing or planned infrastructure, and are serviced by and integrated with its strategic infrastructure networks.
- Specify minimum number of dwellings requirements, including that there is no minimum threshold if the Special Housing Area is a Housing New Zealand or Registered Social Housing Scheme (Schedule 1, A8). This will help to ensure identification of Special Housing Areas that are of an appropriate scale. In addition, we **request** that further consideration be given to identifying a maximum number of dwellings requirement(s).

2.3 The council **supports** the provisions outlined in Schedule 3 of the draft policy related to infrastructure requirements and **requests** that these be retained. These provisions help ensure that the provision of housing will not undermine other desired outcomes, for example, those related to water quality, storm water mitigation and offsetting, and integrated catchment planning, which are critical to the region's economic, social, environmental and cultural wellbeing.

2.4 The council **appreciates** the opportunity to provide feedback on the draft policy to help develop it further. We are also very willing to provide further information and evidence, as appropriate, to support further development of the draft policy.

Should you have any questions or need to seek further information in regard to this submission, please contact Greg Morton ([greg.morton@waikatoregion.govt.nz](mailto:greg.morton@waikatoregion.govt.nz)) at Waikato Regional Council.

## Proposed Housing Accord Policy

### **Do you have any supporting documentation you would like to include?**

Submission attached.

### Hearings and Contact Information

**Do you wish to speak in support of your submission at a Council hearing?** *If you don't want to speak at the hearing, but would like staff to know who this submission is from, you are welcome to fill in the Contact Details section.*

No

**What is your name?**

John De Luca

**What is your organisation?**

Porter Developments Limited

## Submission on Draft Hamilton Housing Accord Policy

### 1. About Porter Developments Limited

- 1.1 Porter Developments Limited is part of the Porter Group of companies, formed over seventy two years ago in the Waikato and with its global headquarters based in Hamilton.
- 1.2 Porter Developments Limited are landowners, developers and business operators who have significant landholdings in north Hamilton at Te Rapa and Rotokauri. Their interests span residential, commercial and industrial sectors.
- 1.3 Porter Developments Limited has interests in the residential sector and hence may explore the option of utilising the Housing Accords and Special Housing Areas Act (HASHAA) and the Special Housing Areas (SHA) Policy to facilitate housing developments in Hamilton.

### 2. General feedback

- 2.1 Porter Developments Limited appreciates the opportunity to provide feedback on the Policy.
- 2.2 Porter Developments Limited supports the intent of the Policy to enable the establishment of SHAs and enhance housing affordability. However, it is considered that the Policy could be more enabling and there are some limitations that need further consideration in Section 3 below.
- 2.3 Porter Developments Limited supports the purpose of the Housing Accords and Special Housing Areas Act 2013 (HASHAA) to enhance housing affordability by facilitating an increase in land and housing supply in Hamilton.
- 2.4 Porter Developments Limited supports the Housing Accord between Central Government and Hamilton City Council (the Council) and the establishment of special housing areas (SHAs) in Hamilton so as to enhance housing affordability.
- 2.5 Porter Developments Limited notes that the HASHAA requires decisions on greenfield developments to be made within six months and decisions on brownfield developments to be made within three months. That compares with the standard system where it can take up to three years for a decision to be made. Porter Developments Limited support any streamlining of current processes to increase housing supply thus enhancing housing affordability.
- 2.6 Porter Developments Limited generally supports the submission made by the Property Council New Zealand.

### 3. Specific Feedback

#### *Principles*

- 3.1 Porter Developments Limited understand that one of the reasons for the government enacting the HASHAA and establishing SHAs is that existing planning frameworks under the RMA have had a significant impact in limiting housing supply and hence affordability.



- 3.2 It is considered that the Policy could be more enabling in this context, as it appears to place greater emphasis on the strategic direction set within the Partly Operative District Plan (PODP) rather than those matters which must be taken into account and weighted in accordance with Section 34(1) of the HASHAA.

### *Policy Implementation Criteria*

- 3.3 Paragraph 16 of the Policy implies that developers will not be able to actively seek the establishment of SHAs but that the Council will call for proposals from time to time at their discretion. Porter Developments Limited would like the ability to be proactive and submit a proposal for the establishment of an SHA at any given time. The proposed approach could be quite restrictive in terms of allowing developers to respond to market demands in a timely manner.

### *Schedule 1 – Framework for Evaluating SHAs*

#### A4 Locational Considerations

- 3.4 The policy should recognise that some Industrial land is suitable for SHAs, particularly where it adjoins existing residential activity and appropriate reverse sensitivity controls are already in place. Industrial land adjoining residential is generally compromised by Amenity Protection setbacks, landscape buffers, noise and other reverse sensitivity controls.
- 3.5 The policy should recognise that some Industrial land is suitable for SHAs, particularly those sites where industrial development is constrained in some way due to poor access or access that requires cost prohibitive upgrades
- 3.6 The policy should recognise that some Industrial and Business zoned land is suitable for SHAs, where located in close proximity to significant social infrastructure; close to the CBD (and hence assisting with revitalisation of the CBD); and in parts of the city where the availability of residential sections is limited/in short supply.
- 3.7 The policy should encourage the use of lower order business land (i.e. land zoned Business 6) for SHAs particularly where there is existing mixed use development and in certain locations where business activities are no longer viable or supported by the catchment.
- 3.8 The policy should encourage the unlocking and conversion of landholdings that can be utilised for residential in the short-term thus unlocking the supply side over the next 1 - 5 years which is when most of the pressure will come in terms of supply given that the infrastructure for Peacocke and Rotokauri is unlikely to be in place before then.

#### A6 Affordability and A8 Minimum Number of Dwellings

- 3.9 The requirement for a certain proportion of qualifying developments to compromise small subdivision allotment and/or dwellings to deliver more affordable housing is not supported by Porter Developments Limited. The primary purpose of SHA's should be to increase supply, not the provision of housing at particular price points. The market will dictate this and it is through increased supply that house prices will be moderated, not by policy criteria that limits lot sizes and/or only provides for certain types of houses. It is considered that the affordability criteria in A6 (a) – (c) should be removed from the Policy.





# PORTERGROUP

- 3.10 Both the private sector and the charitable sector play important roles in enhancing housing affordability and housing supply. There is no good reason in preferring one over the other. In particular, the Accord talks of a “well-functioning private sector led housing market”.
- 3.11 The Policy draws a distinction between private housing providers and social housing providers (for example, there is no minimum number of dwellings threshold for Housing NZ or Registered Social Housing Schemes). Porter Developments Limited is unsure of the justifications for this distinction, particularly in the context of achieving the purpose of the HASHAA.
- 3.12 The Policy uses the term ‘developers’ in some places and the terms ‘private housing providers’ and ‘social housing providers’ at other places. Porter Developments Limited recommends that the Council consider replacing the words ‘private housing providers’ and ‘social housing providers’ with ‘developers’. We note the change will also be of benefit to the Council in the event the Council decides to convert land it owns to housing, and wants to take advantage of the fast-tracking process available for SHAs.

## 4. Conclusion

- 4.1 Porter Developments Limited supports the purpose of the Housing Accords and Special Housing Areas Act 2013 (HASHAA) to enhance housing affordability by facilitating an increase in land and housing supply in Hamilton.
- 4.2 Porter Developments Limited supports the intent of the Policy to enable the establishment of SHAs and enhance housing affordability. However, it is considered that the Policy could be more enabling as outlined in this submission.
- 4.3 Porter Developments Limited generally supports the submission made by the Property Council New Zealand.
- 4.4 We would welcome the opportunity to engage further with the Council on the issues raised in this submission, and also assist with further analysis of the Policy.

Yours sincerely

John De Luca  
Property Manager  
Porter Developments Limited

## Proposed Housing Accord Policy

**Do you have any supporting documentation you would like to include?**

Submission attached.

### Hearings and Contact Information

**Do you wish to speak in support of your submission at a Council hearing?** *If you don't want to speak at the hearing, but would like staff to know who this submission is from, you are welcome to fill in the Contact Details section.*

Yes

**What is your name?**

Karleen Broughton

**What is your organisation?**

WEL Networks Limited

14 July 2017

Luke O'Dwyer  
Economic Growth & Planning  
Hamilton City Council  
Private Bag 3010  
Hamilton 3240

Dear Luke,

**RE: WEL Networks Limited - Submission to the Draft Special Housing Areas Policy**

Please find attached to this letter WEL Networks Limited's submission on the Draft Special Housing Areas Policy.

If you have any questions relating to our submission please do not hesitate to contact me.

Yours sincerely,



Sara Brown  
Planner  
WEL Network Limited  
[sara.brown@wel.co.nz](mailto:sara.brown@wel.co.nz)  
07 850 3192

**Submission by  
WEL Networks Limited on the  
Draft Special Housing Areas Policy**

## **1. PART A – INTRODUCTION**

### **1.1 WEL Networks Limited**

WEL Networks Limited (“WEL”) is an Electricity Distributor operating under the Electricity Act 1992, which owns, operates and develops electricity distribution infrastructure in the Waikato Region to provide line function services to over 89,000 consumer connections. This includes the distribution of electricity to all residences and businesses within Hamilton City.

WEL, as a network utility operator under the Resource Management Act 1991 (“RMA”), has the responsibility of providing a secure and efficient supply of electricity to the community within WEL’s distribution network area. WEL’s network of cables and lines allows every household, business, school, medical facility and other types of consumer to have access to electricity.

## **2. PART B - WEL’S SUBMISSION TO THE DRAFT SPECIAL HOUSING AREAS POLICY**

WEL is supportive of the proposal by Hamilton City Council (“Council”) to implement a Draft Special Housing Areas Policy. The Draft Special Housing Areas Policy will ensure a greater supply of affordable housing in Hamilton while ensuring the adequate provision and supply of infrastructure is not compromised by such development.

In particular, WEL supports the inclusion of Schedule 1 (A5) which requires the applicant to provide evidence to Council that adequate infrastructure can service the development.

Schedule 3 reiterates the requirement of Schedule 1 and requires the applicant to provide evidence that infrastructure exists or is planned to service the development.

The infrastructure requirements provided for in Schedules 1 and 3 require the applicant to actively engage WEL who will determine if the development can be serviced with electricity. WEL can then determine the type of infrastructure required for the development and any legal arrangements that need to be completed such as easements or Council negotiations for network utility equipment within road reserve.

This requirement is of particular importance as development becomes concentrated and less space is available for network utility infrastructure underground and above ground such as transformers and pillar boxes within Council administered road reserve. With larger infill developments WEL may need to secure space within road reserve to locate network utility equipment to supply the development. In these instances it is necessary that Council and WEL work collaboratively to create a balance between streetscape amenity and the requirement for infrastructure.

Furthermore early engagement will enable WEL to plan network upgrades where development is likely to become concentrated.

In addition to the engagement provided for in Schedule 3, WEL requests that Council require confirmation in writing that a subdivision has been adequately supplied and this confirmation would accompany an application for 224c (consistent with the current process for subdivision). The reasoning for this request is to ensure that the landowner fulfils their responsibilities in relation to the electricity supply.

### 1.2 Summary of Submission Points

Item	Policy Wording	Request	Comment
Schedule 1	<p><b>A5 Adequate Infrastructure</b></p> <p>...</p> <p>b. Infrastructure can and will be provided and funded by the landowner or developer at no cost to, and without unforeseen or adverse financial or environmental costs on the Council or other relevant infrastructure providers. The Council will assess the infrastructure requirements of a proposed SHA against the matters listed in Schedule 3 to this Policy.</p>	<p><b>Support as Drafted</b></p>	<p>Schedule 1 will ensure that adequate infrastructure can service the development.</p>
Schedule 3	<p>The relevant infrastructure includes:</p> <p>...</p> <ul style="list-style-type: none"> <li>• Network utilities (electricity, gas and telecommunications).</li> </ul> <p>...</p> <p>For non-Council infrastructure such as state highways, government facilities (e.g. schools), or network utilities (e.g. electricity, gas and telecommunications), evidence needs to be provided to Council that satisfies that the infrastructure exists or is planned by the relevant service provider with additional capacity to accommodate the likely individual and cumulative demand generated from a qualifying development/s in the SHA.</p>	<p><b>Support with Amendments, as follows:</b></p> <p>For non-Council infrastructure such as state highways, government facilities (e.g. schools), or network utilities (e.g. electricity, gas and telecommunications), evidence needs to be provided to Council that satisfies that the infrastructure exists or is planned by the relevant service provider with additional capacity to accommodate the likely individual and cumulative demand generated from a qualifying development/s in the SHA.</p> <p><u>Clearance from all non-Council infrastructure providers is required to accompany an application for 224(c).</u></p>	<p>The proposed amendment will ensure that the developer completes all obligations related to a subdivision.</p>

## Proposed Housing Accord Policy

### **Do you have any supporting documentation you would like to include?**

Submission attached.

### Hearings and Contact Information

**Do you wish to speak in support of your submission at a Council hearing?** *If you don't want to speak at the hearing, but would like staff to know who this submission is from, you are welcome to fill in the Contact Details section.*

No

**What is your name?**

John Gallagher and Keith Gallagher

**What is your organisation?**

Gallagher Charitable Trust

**GALLAGHER CHARITABLE TRUST**

**Submission on  
Hamilton Special Housing Areas Policy**

**July 2017**

**To:**

Hamilton City Council  
Kelvyn Eglinton/Luke O'Dwyer  
Growth & Infrastructure  
Via E-Mail: [economicgrowth&urbanpolicy@hcc.govt.nz](mailto:economicgrowth&urbanpolicy@hcc.govt.nz)

**Name of Submitter:**

Gallagher Charitable Trust  
Private Bag 3026  
HAMILTON 3240  
DDI: 07 838-9825  
Mob: 0274 969-143  
E-Mail: [sue@galmgmt.co.nz](mailto:sue@galmgmt.co.nz)

**Submission:**

This is a submission from Gallagher Charitable Trust on the **Hamilton Special Housing Areas Policy**. The content of the submission follows overleaf.



## 1. About Gallagher Charitable Trust

Gallagher Charitable Trust was founded in May 1984 by John Gallagher and Sir William Gallagher. The Trust is a sustainable entity formed to specifically cater for benefactor grants in Hamilton and the greater Waikato region. The Trust supports organisations which support the social fabric of the community and assists those of limited economic means with a "hand up not a hand out". Gallagher Charitable Trust has been a long-time supporter of social housing initiative programmes with the organisation Habitat for Humanity, building homes in Hamilton and the wider Waikato region for those who would not otherwise be able to achieve home ownership.

- 1.1 Hence Gallagher Charitable Trust is interested in the residential sector and may explore the option of utilising the Housing Accords and Special Housing Areas Act (HASHAA) and the Special Housing Areas (SHA) Policy to facilitate housing developments in Hamilton.

## 2. General feedback

- 2.1 Gallagher Charitable Trust appreciates the opportunity to provide feedback on the Policy.
- 2.2 Gallagher Charitable Trust supports the intent of the Policy to enable the establishment of SHAs and enhance housing affordability. However, it is considered that the Policy could be more enabling and there are some limitations that need further consideration in Section 3 below.
- 2.3 Gallagher Charitable Trust supports the purpose of the Housing Accords and Special Housing Areas Act 2013 (HASHAA) to enhance housing affordability by facilitating an increase in land and housing supply in Hamilton.
- 2.4 Gallagher Charitable Trust supports the Housing Accord between Central Government and Hamilton City Council (the Council) and the establishment of special housing areas (SHAs) in Hamilton so as to enhance housing affordability.
- 2.5 Gallagher Charitable Trust notes that the HASHAA requires decisions on greenfield developments to be made within six months and decisions on brownfield developments to be made within three months. That compares with the standard system where it can take up to three years for a decision to be made. Gallagher Charitable Trust support any streamlining of current processes to increase housing supply thus enhancing housing affordability.
- 2.6 Gallagher Charitable Trust generally supports the submission made by the Property Council New Zealand.

## 3. Specific Feedback

### *Principles*

- 3.1 Gallagher Charitable Trust understand that one of the reasons for the government enacting the HASHAA and establishing SHAs is that existing planning frameworks under the RMA have had a significant impact in limiting housing supply and hence affordability.
- 3.2 It is considered that the Policy could be more enabling in this context, as it appears to place greater emphasis on the strategic direction set within the Partly Operative District Plan (PODP) rather than those matters which must be taken into account and weighted in accordance with Section 34(1) of the HASHAA.

*Policy Implementation Criteria*

- 3.3 Paragraph 16 of the Policy implies that developers will not be able to actively seek the establishment of SHAs but that the Council will call for proposals from time to time at their discretion. Gallagher Charitable Trust would like the ability to be proactive and submit a proposal for the establishment of an SHA at any given time. The proposed approach could be quite restrictive in terms of allowing developers to respond to market demands in a timely manner.

*Schedule 1 – Framework for Evaluating SHAs*A4 Locational Considerations

- 3.4 The policy should recognise that some Industrial land is suitable for SHAs, particularly where it adjoins existing residential activity and appropriate reverse sensitivity controls are already in place. Industrial land adjoining residential is generally compromised by Amenity Protection setbacks, landscape buffers, noise and other reverse sensitivity controls.
- 3.5 The policy should recognise that some Industrial land is suitable for SHAs, particularly those sites where industrial development is constrained in some way due to poor access or access that requires cost prohibitive upgrades
- 3.6 The policy should recognise that some Industrial and Business zoned land is suitable for SHAs, where located in close proximity to significant social infrastructure such as healthcare and/or educational facilities (eg: Hospital and/or Waikato University); close to the CBD (and hence assisting with revitalisation of the CBD); and in parts of the city where the availability of residential sections is limited/in short supply.
- 3.7 The policy should encourage the unlocking and conversion of landholdings that can be utilised for residential in the short-term thus unlocking the supply side over the next 1 - 5 years which is when most of the pressure will come in terms of supply given that the infrastructure for Peacocke and Rotokauri is unlikely to be in place before then.

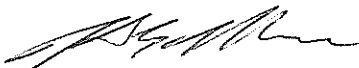
A8 Minimum Number of Dwellings

- 3.8 Both the private sector and the charitable sector play important roles in enhancing housing affordability and housing supply. There is no good reason in preferring one over the other. In particular, the Accord talks of a "well-functioning private sector led housing market".
- 3.9 The Policy draws a distinction between private housing providers and social housing providers (for example, there is no minimum number of dwellings thresh-hold for Housing NZ or Registered Social Housing Schemes). Gallagher Charitable Trust is unsure of the justifications for this distinction, particularly in the context of achieving the purpose of the HASHAA.
- 3.10 The Policy uses the term 'developers' in some places and the terms 'private housing providers' and 'social housing providers' at other places. Gallagher Charitable Trust recommends that the Council consider replacing the words 'private housing providers' and 'social housing providers' with 'developers'. We note the change will also be of benefit to the Council in the event the Council decides to convert land it owns to housing, and wants to take advantage of the fast-tracking process available for SHAs.

**4. Conclusion**

- 4.1 Gallagher Charitable Trust supports the purpose of the Housing Accords and Special Housing Areas Act 2013 (HASHAA) to enhance housing affordability by facilitating an increase in land and housing supply in Hamilton.
- 4.2 Gallagher Charitable Trust supports the intent of the Policy to enable the establishment of SHAs and enhance housing affordability. However, it is considered that the Policy could be more enabling as outlined in this submission.
- 4.3 We would welcome the opportunity to engage further with the Council on the issues raised in this submission, and also assist with further analysis of the Policy.

Yours sincerely



John Gallagher CNZM KStJ JP HonD CFinStD  
Chairman & Trustee  
Gallagher Charitable Trust



Keith Gallagher  
Trustee  
Gallagher Charitable Trust

## Proposed Housing Accord Policy

**Do you have any supporting documentation you would like to include?**

Submission attached.

### Hearings and Contact Information

**Do you wish to speak in support of your submission at a Council hearing?** *If you don't want to speak at the hearing, but would like staff to know who this submission is from, you are welcome to fill in the Contact Details section.*

Yes

**What is your name?**

Robert Dol

**What is your organisation?**

Golden Valley Farms

### Executive summary

- i. Golden Valley Farm Limited, Golden Park Farm Limited and Golden Ridge Farm Limited (**Golden Valley Farms**) supports the intent of the Housing Accords and Special Housing Areas Act 2013 (**HASHAA**).
- ii. We support the Housing Accord between Central Government and Hamilton City Council (**the Council**) and the establishment of special housing areas (**SHAs**) in Hamilton so as to enhance housing affordability.
- iii. The purpose of the draft Hamilton Special Housing Areas Policy's (**Policy**) purpose (outlined at paragraph 13) can be summarised as being to provide guidance to the Council and the development community in applying the HASHAA.
- iv. The draft Policy must ensure it does not introduce new requirements and/or alter requirements (of the HASHAA).
- v. The draft Policy needs to be amended to better achieve the purpose of the HASHAA and the Hamilton Housing Accord (**the Accord**).
- vi. The draft Policy's rigidity and overemphasis on the Partially Operative District Plan (**PODP**) risks undermining the HASHAA and the Accord, and thereby reducing the opportunity to enhance housing affordability.
- vii. The draft Policy does not provide the certainty and clarity developers/investors need – if adopted in its current form, there is unlikely to be a noticeable uptake of greenfield development or in areas not already zoned residential given the Council is unwilling to:
  - (a) provide infrastructure not already in its capital works programme
  - (b) does not consider land holdings that is proposed through the draft Future Proof Strategy update to ultimately come into Hamilton City boundaries
  - (c) give equal priority to applications that do not meet the (zoning) requirements of the PODP.

## **1. About Golden Valley Farm**

- 1.1 Golden Valley Farm has large land holding just outside of the southern Hamilton City boundary in Waipa District. The land is located between Saxbys Road to the north and Houchens Road to the south.
- 1.2 Golden Valley Farm are aware the draft Future Proof Strategy Update proposes to progress negotiations between Hamilton City Council and Waipa District Council in relation to a strategic agreement regarding transferring the Waipa District land on the Hamilton City-side of the Southern Links designation
- 1.3 Golden Valley Farm has interests in the residential sector and hence may explore the option of utilising the Housing Accords and Special Housing Areas Act (HASHAA) and the Special Housing Areas (SHA) Policy to facilitate housing developments in Hamilton.

## **1. General comments**

- 1.1 Golden Valley Farms thanks the Council for giving us the opportunity to make a submission on the draft Policy.
- 1.2 We also thank the Council for its keenness to consult with the wider community in relation to the establishment of SHAs and the draft Policy.
- 1.3 Golden Valley Farms generally supports the submission made by the Property Council New Zealand.
- 1.4 We submit in favour of paragraphs 1-5, and 8-12 of the draft Policy.
- 1.5 We submit in favour of the second and third paragraphs of A6 Affordability under Schedule 1 – Framework for Evaluating SHAs – of the draft Policy, as well as part of A6.g., because they reflect commercial realities and recognise that a blanket rule requiring a number of dwellings to be sold at a certain price creates significant cross-subsidisation by other dwellings in the SHA. The paragraphs supported above seek to satisfy the requirements of the HASHAA through other means.
- 1.6 We also submit in favour of A13 Delegation under Schedule 1 – Framework for Evaluating SHAs of the draft Policy.

### **HASHAA**

- 1.7 Golden Valley Farms supports the intent of the HASHAA, the Accord between Central Government and the Council, and the establishment of SHAs in Hamilton.
- 1.8 Golden Valley Farms notes that the HASHAA requires decisions on greenfield developments to be made within six months and decisions on brownfield developments to be made within three months. That compares with the standard system where it can take up to three years for a decision to be made.
- 1.9 The purpose of the HASHAA is to enhance housing affordability *by* facilitating an increase in land and housing supply in regions or districts identified as having housing supply and affordability issues. Unfortunately, there is an error in paragraph 7 of the draft Policy in that it treats the *process* by which affordability is to be enhanced as the HASHAA's purpose/intent.

- 1.10 Golden Valley Farms requests the Council to accordingly amend paragraph 7 of the draft Policy as follows (additions are underlined, deletions are ~~struck through~~):

The legislative intent of HASHAA is to enhance housing affordability by speeding up the process of bringing to market additional residential land beyond that currently zoned in the Partly Operative District Plan. Through this additional land supply, and in combination with other economic factors, the overall supply of affordable housing within Hamilton City will be enhanced.

*The Policy will be a guidance document*

- 1.11 The principal purpose of the Policy will be to guide the Council in applying the HASHAA, as stated at paragraph 13 of the draft Policy. It is not compulsory to adopt a Policy in order to fulfil obligations under the Accord, or to establish SHAs.
- 1.12 It is therefore important to ensure the Policy remains a guidance document and that it does not misconstrue the requirements of, or introduce requirements that are not in, the HASHAA.

**2. Key limitations of the draft Policy**

- 2.1 The draft Policy's current form is too restrictive and not enabling to the extent it could be.
- 2.2 Golden Valley Farms recommends amending the draft Policy in order to avoid ambiguity and better apply the HASHAA. In addition to the discussions below, we generally support the changes recommended by the Property Council New Zealand to the draft Policy as included in **Appendix 1** of their submission.

*Need for consistency with the HASHAA*

- 2.3 In order to ensure the HASHAA is applied correctly, the Policy must be consistent with the HASHAA.
- 2.4 For instance, paragraph 14.j. of the draft Policy can be interpreted as placing too much emphasis on urban design qualities and beyond those stipulated under section 34(1) of the HASHAA – vis-à-vis giving lesser weight to urban design qualities as compared to matters at section 34(1)(a) – (d) of the HASHAA.
- 2.5 In its current form, paragraph 14.j. of the draft Policy can cause ambiguity amongst the Council staff. Golden Valley Farms therefore recommends the Council to amend paragraph 14.j. of the draft Policy as follows:

Development of SHAs will ~~achieve high quality urban design outcomes~~ be in accordance with section 34 of the HASHAA.

*Lack of clarity around when SHA applications may be made*

- 2.6 The proposed requirement at paragraph 16 of the draft Policy indicates that developers will not be able to actively seek the establishment of SHAs but that the Council will call for proposals from time to time. This proposed approach is very restrictive and not at all proactive in terms of enhancing housing affordability.
- 2.7 Golden Valley Farms submits that paragraph 16 be accordingly amended to as follows:

Council will, ~~from time to time at its discretion, call for~~ process and assess proposals received at any given time from land owners and developers seeking to become a SHA. Proposals can be made by any party, including Council.

*Excessive emphasis on the PODP to maintain the status quo*

- 2.8 As alluded to in paragraph 2.8, one of the reasons for enacting the HASHAA and establishing SHAs is that the standard planning process has fallen short of enabling sufficient housing. The Policy must therefore be more enabling.
- 2.9 Unfortunately, the draft Policy places an overemphasis on the PODP at the expense of achieving the outcomes being sought by the HASHAA and the Accord.
- 2.10 Golden Valley Farms submits that the draft Policy should be amended so that the Policy is more enabling and does not place an overemphasis on the Council's strategic land use planning and the PODP. The changes recommended in this regard are laid out in Appendix 1 of the Property Council New Zealand submission.

*Averseness to greenfield development*

- 2.11 The key mechanism in the HASHAA is the creation of SHAs in greenfield and brownfield areas suitable for residential development, where there is demand for new housing, and where infrastructure is already available *or is likely to exist*.
- 2.12 The draft Policy indicates that the Council's focus will be brownfield areas, that is, areas already zoned and/or already accounted for in the Council's capital works programme for infrastructure provision. We interpret paragraphs 14.d., g., and h. (under Principles) of the draft Policy as alluding to this.
- 2.13 For instance, paragraph 14.g. of the draft Policy states that where infrastructure is unavailable, all necessary infrastructure will be funded and provided by the developer. This (draft) requirement fails to realise the reality that developers do not have the required balance sheet to be able to carry multimillion-dollar debt for 25-30 years. Requirements such as this will do little to incentivise the establishment of SHAs in (new) greenfield areas.
- 2.14 Instead of being overly averse to greenfield development, the Council can consider tranches. This approach would allow SHAs to be established in greenfield areas with no infrastructure and receive consenting now, but with infrastructure being provided at a future date, once the Council is able to accommodate the works in its capital works programme. Such an approach would:
- (i) allow the development community to take advantage of the fast-track process under the HASHAA for greenfield areas with no infrastructure available
  - (ii) provide clear signals to the Council in terms of where and when infrastructure is to be provided
  - (iii) give a clear indication to developers that they can wait for several years for the infrastructure to be supplied, or go ahead and provide the infrastructure themselves
  - (iv) achieve synchronisation with, and give better effect to, the Hamilton Urban Growth Strategy
  - (v) help the Council better meet its obligations under the National Policy Statement on Urban Development Capacity.
- As stated by the Auckland Unitary Plan Independent Hearings Panel in July 2016, it was not persuaded that the funding of infrastructure should be allowed to determine land use planning.



- 2.15 The draft Policy implies that SHAs in greenfield areas where the Council's strategic infrastructure networks are unavailable ought to be avoided; however, a more enabling approach could be considered to unlock development potential for sites of this nature.

*Different requirements for private and social housing providers*

- 2.16 Both the private sector and the charitable sector play important roles in enhancing housing affordability and housing supply. There is no good reason in preferring one over the other. In particular, the Accord talks of a "well-functioning private sector led housing market".
- 2.17 The draft Policy draws a distinction between private housing providers and social housing providers (for example, about a 10-dwelling minimum). Golden Valley Farms is unsure of the justifications for this distinction, particularly in the context of achieving the purpose of the HASHAA.
- 2.18 The draft Policy uses the term 'developers' in some places and the terms 'private housing providers' and 'social housing providers' at other places. Golden Valley Farms recommends that the Council consider replacing the words 'private housing providers' and 'social housing providers' with 'developers'. We note the change will also be of benefit to the Council in the event the Council decides to convert land it owns to housing, and wants to take advantage of the fast-tracking process available for SHAs.

**3. Converting suitable land to SHAs for wider gains**

- 3.1 The Policy should encourage the unlocking and conversion of landholdings that can be utilised for residential activity in the short-term, thus unlocking housing supply over the next one to five years which is when most of the pressure will come in terms of supply given that the infrastructure for Peacocke and Rotokauri is unlikely to be in place before then.
- 3.2 Golden Valley Farms recommends that the Policy should recognise that:
- some land holdings that are proposed through the draft Future Proof Strategy update to ultimately come into Hamilton City boundaries in the short term that is suitable for SHAs, particularly where it adjoins existing residential activity and with the ability to connect into existing council infrastructure.

**4. Conclusion**

- 4.1 We would welcome the opportunity to engage further with the Council on the issues raised in this submission, and also assist with further analysis of the draft Policy.
- 4.2 As stated in paragraph 2.2, we generally support the changes recommended by the Property Council New Zealand to the draft Policy as included in **Appendix 1** of their submission.

Yours sincerely



Robert Dol  
Development Manager  
Golden Valley Farms

## Proposed Housing Accord Policy

**Do you have any supporting documentation you would like to include?**

Submission attached.

### Hearings and Contact Information

**Do you wish to speak in support of your submission at a Council hearing?** *If you don't want to speak at the hearing, but would like staff to know who this submission is from, you are welcome to fill in the Contact Details section.*

Yes

**What is your name?**

Andrew Hill, Beca

**What is your organisation?**

on behalf of Ministry of Education

11 July 2017

Urban Policy Team  
Hamilton City Council  
Garden Place  
Hamilton 3240

## **Draft Special Housing Areas Policy**

### **Background:**

The Ministry of Education is the Government's lead advisor on the New Zealand education system, shaping direction for education agencies and providers and contributing to the Government's goals for education. The Ministry has responsibility for all education property owned by the Crown. This involves managing the existing property portfolio, upgrading and improving the portfolio, purchasing and constructing new property to meet increased demand, identifying and disposing of surplus State school sector property and managing teacher and caretaker housing. The Ministry is therefore a considerable stakeholder in terms of activities that may impact on educational facilities and assets in the Hamilton City area.

### **The Ministry's submission on the Draft Special Housing Areas Policy**

Hamilton City Council is reviewing its Draft Special Housing Area Policy. The Ministry of Education supports the inclusion of Schedule 1 – Framework for Evaluating Special Housing Areas (SHAs) which sets out the agreed selection process and criteria for establishing Special Housing Areas (SHAs) in Hamilton.

In particular the Ministry supports criteria A5:

#### **A5 Adequate Infrastructure**

*The Council is satisfied that either:*

*a. Adequate infrastructure exists to accommodate the likely additional individual and cumulative demand from a qualifying development in the area; or*

*b. Infrastructure can and will be provided and funded by the landowner or developer at no cost to, and without unforeseen or adverse financial or environmental costs on the Council or other relevant infrastructure providers. The Council will assess the infrastructure requirements of a proposed SHA against the matters listed in Schedule 3 to this Policy.*

**Relief Sought:** The Ministry supports the inclusion of *Education Infrastructure* in Schedule 3 and asks that this criteria is retained in the policy. The Ministry would also like to continue to be consulted on SHAs which come before the council for approval. This includes, not only greenfield developments, but also areas of infill housing, which the Ministry understands is how Council intends to address up to 50 percent of growth within Hamilton City area. These developments can have an impact on the provision of education and the Ministry needs to be able to plan for any potential effects on their network.

Should you have any more queries please do not hesitate to contact as the undersigned as the consultant to the Ministry.



Andrew Hill, Planner (Beca Ltd) P: 07 577 3938 E: andrew.hill@beca.com

## Proposed Housing Accord Policy

**Do you have any supporting documentation you would like to include?**

Submission attached.

### Hearings and Contact Information

**Do you wish to speak in support of your submission at a Council hearing?** *If you don't want to speak at the hearing, but would like staff to know who this submission is from, you are welcome to fill in the Contact Details section.*

Not Answered

**What is your name?**

Jenni Fitzgerald

**What is your organisation?**

New Zealand Transport Agency

**NZ TRANSPORT AGENCY SUBMISSION ON DRAFT HAMILTON SPECIAL HOUSING AREAS  
POLICY**

**TO:** Hamilton City Council  
Private Bag 3010  
**HAMILTON 3240**

**SUBMITTER:** NZ Transport Agency  
PO BOX 973  
Waikato Mail Centre  
**HAMILTON 3240**

**ATTENTION:** Jenni Fitzgerald

**1. Introduction**

1.1 This submission relates to the draft Hamilton Special Housing Areas Policy, as notified by Hamilton City Council on 22 June 2017.

**2. The NZ Transport Agency's Role**

2.1 The NZ Transport Agency (the Transport Agency) is a Crown entity with the sole powers of control for all purposes of all state highways. The Transport Agency is also a significant investor in the local road network. The Transport Agency's objective, functions, powers and responsibilities are derived from the Land Transport Management Act 2003 (LTMA), and the Government Rounding Powers Act 1989 (GRPA). The statutory objective of the Transport Agency is to undertake its functions in a way that contributes to an effective, efficient and safe land transport system in the public interest<sup>1</sup>.

2.2 The Transport Agency has an interest in the Hamilton Special Housing Areas Policy as the Transport Agency is a significant investor in land transport infrastructure both in terms of the local network and also inter-regional and national transport networks. As

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<sup>1</sup> LTMA Section 94

such the Transport Agency has an interest in ensuring that future development recognises and provides for its impacts on infrastructure.

### **3. Submission**

- 3.1 The purpose of the 'draft Hamilton Special Housing Areas Policy' is to establish the process and evaluation criteria that will guide Council in making decisions on whether to accept a proposal for a Special Housing Area (SHA) and recommend to the Minister for Building and Construction that a proposed SHA be established. The Transport Agency has reviewed the draft policy and makes the following comments.

#### *Integration of Special Housing Areas with infrastructure*

- 3.2 The Housing Accords and Special Housing Areas Act 2013 (HASHAA) requires that new development enabled under that legislation have adequate infrastructure. The Transport Agency strongly supports this requirement and suggests that in addition it is also important to ensure that new development is integrated with existing and planned infrastructure including the State Highway network. Failure to do so may compromise the function of current and planned infrastructure including regionally and nationally significant infrastructure. This would be contrary to the Waikato Regional Policy Statement which provides direction regarding the strategic integration of land use and infrastructure.
- 3.3 Principle 14 d of the draft Policy states that Council will enable SHAs that achieve the purpose of HASHAA provided they do not compromise or undermine Council's existing or planned infrastructure, and are generally consistent with Council's strategic land use planning. The Transport Agency strongly supports this principle but would suggest that this should be broadened to consider all "public existing or planned infrastructure".
- 3.4 The state highway network is public infrastructure designed to service regional and national transport movements. Local developments should appropriately consider and integrate with the state highway network. Failure to do so may compromise the significant public investment in this infrastructure.

3.5 The Transport Agency supports Schedule 3 of the draft Policy, specifically the final paragraph requiring applicants to provide evidence of integration with non-Council infrastructure such as state highways.

Consultation and feedback

3.6 The Transport Agency supports Council seeking feedback on proposed SHA. In particular the Transport Agency supports Council seeking feedback from statutory agencies. The Transport Agency requests it is consulted on all SHA applications that has the potential to impact on the state highway network. This feedback will ensure that Council can make a fully informed recommendation to the Minister on any proposed SHA.

Consideration of the Hamilton Partly Operative District Plan

3.7 The Transport Agency was a submitter to the Proposed Hamilton District Plan. The Transport Agency supports the objectives and policies of the Partly Operative District Plan and therefore supports this Policy requiring appropriate consideration of the PODP when evaluating any proposed SHA.

**4. Conclusion**

4.1 The Transport Agency generally supports the draft Hamilton Special Housing Areas Policy but has requested changes to ensure that appropriate consideration is given to the full range of infrastructure potentially impacted by the development of SHAs.



Signed by Jenni Fitzgerald

Principal Planner

Under delegated authority of

The NZ Transport Agency

Date: 14 July 2017