

Summary of Submissions: Queenstown Lakes District Council Planning for Affordable Housing Initiative

January 2022

Introduction

The Queenstown Lakes District Council (QLDC or Council) has undertaken consultation on the Council's draft Homes Strategy and possible affordable housing provisions that may be incorporated into the QLDC district plan (the 'planning for affordable homes initiative').

This report provides a summary of the submissions received on the affordable housing component of the consultation undertaken over August and September 2021. This report does not respond to the views expressed in the submissions, rather it identifies key issues that will be taken into account in the s32 analysis and reporting for the possible plan change.

Context

QLDC are considering whether there should be a district plan requirement on new housing developments to incorporate affordable housing in the form of residential lots or units sold at an affordable price, or through the transfer of land or money to the Council for the purpose of providing affordable dwellings (sometimes referred to as inclusionary zoning or 'IZ').

The Council has developed four potential approaches to inclusionary zoning based on findings from previous experience with inclusionary zoning, analysis of housing demand and reporting on anticipated costs and benefits of an inclusionary zoning policy, in the longer term. The four options are:

- Option 1: Update the District Plan to reduce and remove controls that affect affordability, and at the same time, negotiate with developers to provide retained affordable housing when Council is able
- Option 2: Update the District Plan to provide a bonus/incentive to developers for the provision of retained affordable housing
- Option 3: Update the District Plan to implement a mandatory requirement for developers to include some retained affordable housing – applied to new developments only
- Option 4: Update the District Plan to implement a mandatory contribution to include some retained affordable housing – applied to both new development and redevelopments.
- Or none of the above.

Consultation Process

Public consultation (under the Local Government Act) on the Homes Strategy and affordable housing initiative was held from 16 August to 26 September 2021. A variety of methods and materials were used to invite feedback and engagement, including:

- a) Newspapers and radio
- b) Social media tools and QLDC website

c) Web site and feedback form.

The following background reports were all available online:

- Working Paper and Draft Provisions
- Issues and Options - Planning for Affordable Housing
- Economic Case for Inclusionary Zoning
- Valuation Report for Inclusionary Zoning – June 2020
- Valuation Report for Inclusionary Zoning - March 2021
- Legal advice to QLDC – Alternative Approaches to Addressing Housing Affordability
- Streamlined Planning Process Factsheet.

The Council received 52 emailed submissions and 156 submissions through the Planning for Affordable Housing Survey. (See appendix A and B for summary of submissions received through these channels).

The emailed submissions were generally from lawyers representing property developers or land holders, while the survey responses tended to be from individuals or environmental or community groups.

Approach to analysis

This report provides a summary of the submissions. Each submission has been classified according to the type of submitter (individual, non-government organisation, consultants and lawyers representing a variety of landowners and developers etc). As part of the analysis, it was noted which of the four possible inclusionary zoning options was the preferred option, if any, and whether they provided any other comments or information.

Submissions through the Planning for Affordable Housing Survey

In total 156 responses were received (151 Individual responses and 5 responses from public bodies and housing/ community groups) through the on-line Planning for Affordable Housing Survey. The survey sought feedback on which option was supported and asked respondents to explain their stance on them and whether they had any suggestions to improve them or any other comments.

Survey respondents generally favoured option 4 (71.2% of responses) of the affordable housing initiative; that is, update the district plan to implement a mandatory contribution to include some retained affordable housing – applied to both new development and redevelopments.

Table 1: Survey responses to which option was preferred

Option 1	7.1%
Option 2	4.5%
Option 3	10.3%
Option 4	71.2%
None of the above	6.4%

Respondents generally in favour of options 1 and 2 commented that it is better to incentivise IZ rather than make IZ mandatory. Respondents generally in favour of options 3 and 4 commented that it was better to make it mandatory to ensure the provision of affordable housing.

Respondents in favour of option 3 commented that:

- an unintended consequence is that it may lead to degradation of existing housing stock in older suburbs
- the IZ initiative should apply to greenfield developments only.

Respondents in favour of option 4 commented:

- the option will help ensure there is a pipeline of affordable housing over the long term
- it is a more robust option than the others
- provides QLDC with a leadership opportunity for the rest of NZ
- the scheme should have an eligibility criterion i.e., income levels and/or a preference for first home buyers
- ensure affordable prices or rents or rent to own scheme and that the strategy will help keep people in the area and ensure stability in the area
- provide a range of housing opportunities in brownfield and greenfield developments to enable housing options for various stages of life and circumstance.

Respondents generally opposed to or concerned with the options 3 and 4 commented that:

- they won't be effective, and it will inflate house/development costs; a select few will benefit and costs will be passed onto purchasers
- compliance/planning costs will increase
- the provision of higher density housing will better address affordability as will living wages
- infrastructure contributions would be a better priority.

Specific Points

Forty four percent of responses had suggestions that they thought could improve any of the four possible inclusionary zoning options. The following general opinions were evident from the submissions:

- the Community Housing Trust is doing a great job, however simply increasing the supply of zoned land won't fix the problem
- the Housing Trust's shared equity schemes need to be further developed to make sure first time buyers can't on sell for a profit and the houses stay affordable long term and in the community
- one submission suggested Council provide properties to qualifying residents on a long term lease subject to income thresholds and that short term worker accommodation to cater for seasonal workers needs to be addressed
- the aim should be to increase the volume of affordable housing to more than 1,000 inclusionary zoned houses within the next 30 years.

- there should be criteria for the potential recipients of the affordable housing scheme, such as they should be below a specified income threshold and/or first home buyers, live in the area for a specified time period, for example
- housing should be encouraged where there is adequate planned infrastructure and to facilitate high density housing located near public transport and parks, for instance. Several comments related to the provision of adequate infrastructure provided by Council to support more intense development e.g. improved roads, footpaths
- some submissions commented that higher density housing in particular should be encouraged including different typologies of housing, i.e. family homes, duplexes, terrace, apartments, tiny houses wherever possible
- other submission commented higher densities will exacerbate existing issues such as peak hour traffic problems and lack of private open space
- QLDC should consider what incentives could be utilised to stimulate the redevelopment and densification of brownfields e.g. fast-tracked and streamlined consenting timeframes or up-zoning land for higher density homes
- the Council should examine the possibility of “Linkage Zoning” to supplement Inclusionary Zoning
- the effect of short-term visitor accommodation has on the housing market should be identified and that the strategy should ensure that affordable housing it is not used for this purpose. Some submissions went further and proposed there be a limit on short term holiday visitor accommodation able to be provided in a development or an increased rate on holiday houses to try to discourage them
- the trigger for the requirement should be proportionate to the size/number of developments
- some submissions suggested affordable housing can also be provided by other methods, such as price capping, taxes on second/third homes, develop Council land and other initiatives practiced overseas.

Emailed Submissions

52 emailed submissions were received, as follows:

- 1 joint submission from Ministry of Housing and Urban Development (HUD) and the Ministry for the Environment (MfE)Government
- 5 from public bodies and housing/ community groups and QLD Chamber of Commerce
- 27 emailed submissions from consultants and lawyers representing a variety of landowners and developers
- 14 individuals and planners and lawyers.

List of Written Submitters

Ministry of Housing and Urban Development (HUD) and the Ministry for the Environment (MfE)
Shaping Our Future Inc
Queenstown Lakes Community Housing Trust (QLCHT)
Southern District Health Board
Anderson Lloyd for: Jacks Point Village Holdings Limited, Bergen Trust, Glendhu Bays Trustee Ltd, Glendhu Station Properties Limited, Henley Downs Farm Holdings Limited, Henley Downs Land

Holdings Limited, Jacks Point Land Limited, Jacks Point Village Holdings No 2 Limited, Jacks Point Village Phase 2 Limited, LAC Property Trustees Limited, Lane Hocking, Maryhill Limited, Mount Cardrona Station Village Limited, Mt Christina Limited, Universal Developments Hawea Limited, Universal Developments Limited, Willow Pond Farm Limited.
James Gardner-Hopkins for Cardrona Village Limited, Gibbston Valley Station, Kingston Flyer interests, and others
Russell McVeagh for Winton Property Limited ("Winton")
Southern Planning Group ("SPG") has been engaged on behalf of NTP Development Holdings Limited ("NTP")
Todd Walker Law
Fulton Hogan Land Development Limited (FHLD) Town Planning Group
Brookfields lawyers for Remarkables Park Limited
RCL Henley Downs Limited ('RCL') John Edmonds & Associates
Nadia Lisitsina Jacks Point
Rebecca Wolt (Barrister) for Trojan Helmet Limited and Boxer Hill Trust
Deb Beadle
Rachel (no surname provided)
Cath Gilmour
Susan Rowley
CCS Disability Action
Protect our Winters
Queenstown-Lakes District Chamber of Commerce & Industry
Willow Ridge Developments Ltd
Home Performance Training Programme
Flight Plan 2050

In terms of support or opposition to the options, most of the submissions opposed options 3 and 4.

Table 2: Written submissions - which of the four possible inclusionary zoning options is preferred?

Option 1 or none of the options supported	67%
Option 2	3%
Option 3	2%
Option 4	21%
General support, no option specified	7%

35 submissions expressed no support for any of the options, and if any of the options had to be chosen there was a contingent preference for option 1. There was one submission in favour of a combination of options 1 and 2; two in support of option 3; eleven (mainly individual and public body submitters) preferred option 4 with 1 specifying a combination of option 1 and 4; and a number of submitters who supported IZ but don't specify an option.

Submitters who preferred no option/option 1 overwhelmingly considered that there was insufficient detail provided on options 1 -3 compared to the Council's preferred option 4 and this had skewed the feedback. In addition, it was felt that no reasoning has been provided as to why the current regime of case-by-case negotiations for affordable housing contributions has not worked, with the Council's 'Working Paper' confirms the significant proportion of affordable housing that has been provided from private sector / developers to date. Furthermore, submissions indicate that the significant majority of community housing has been provided by private sector development and

that the provision of community housing has not only been achieved through Special Housing Areas but has been the result of a workable relationship between the Queenstown Lakes Community Housing Trust and developers. It was also expressed this is a cost borne by the developer, and that different negotiated outcomes are unique and provide for social contributions in different ways and depend on the type of development.

MFE/HUD would prefer to see some level of option 1 included within option 4.

General themes emerging from the written submissions

Submitters generally opposed to or concerned with the possible district plan changes commented as follows:

- the draft provisions are highly discretionary and provide for a range of percentage contributions that would vary significantly between different developments and will discourage larger scale development
- the policy basis for this strategy is unclear
- an IZ requirement will potentially result in a reduction in the supply of housing and increase housing prices and these costs will be passed on to buyers or make development unviable
- to support their arguments some submitters commented that IZ would discourage bank lending, add risk, there has been no consultation with developers in terms of future viability, it would encourage development in areas other than QLDC and potentially make housing more unaffordable for middle income earners. Also, it will result in increased monitoring and compliance costs
- some of the submitters offered to meet with Council prior to the Council progressing its strategy to discuss solutions
- insufficient analysis and consultation has been provided particularly in the analysis of options 1 -3, as compared to the Council's preferred option 4. Some submissions were also concerned that QLDC has not included, as an option for feedback, that there should be no Inclusionary Zoning tax at all. It was felt that the above-mentioned issues would skew feedback
- there were also submissions requesting that the provisions should not apply to rural residential development because there has been no analysis of the impacts of the proposal on this type of development
- the provision of housing is a social policy issue better addressed by central government and should not be addressed under the RMA
- IZ is contrary to the National Policy Statement on Urban Development 2020 and the Enabling Housing Supply and Other Matters Amendment Bill
- other options should be considered such as non-regulatory actions like the development of council-owned land and rate and taxpayer support for the community housing sector to spread the burden more equitably. Compulsory acquisition powers, and associated compensation requirements of the Public Works Act 1981 represent a far more appropriate and fair response
- planning measure such as increased densities within the District Plan (such as those provided for under the NPS UD), or through supportive actions associated with the provision

of infrastructure / transport in terms of increasing the supply of residential units will better assist in housing affordability

- the use of the Streamlined Planning Process (SPP) is not supported or inappropriate as it removes appeal rights on merit. This proposal contains complexities, is a new policy direction for QLDC and no other Council in NZ has successfully implemented inclusionary zoning mandatory contributions, and these should be tested at an Environment Court level rather than only at a Council or Ministerial level
- specific exemptions were requested such as seeking exclusion of the Resort and Rural Visitor Zones from the proposed financial contribution provisions and enabling an exemption or an exemption process for development that has some other social good, such as to support historic heritage (like the Kingston Flyer)
- Council has not made its retrospective intentions clear in its consultation. Inclusionary Zoning tax should only apply to any new zoning or resource consent granted following the provisions having legal effect, otherwise it is unreasonable and undermines exiting agreements.

Submitters generally in favour of options 3 or 4 commented as follows:

- identify or prioritise housing for local families, key workers
- conditions on resultant affordable housing to ensure them to be permanent
- compulsory inclusionary zoning contribution be applied to be appreciably higher than the 5%
- restrict the proportion of new developments or redevelopments i.e. to no more than 10% Residential Visitor Accommodation
- use a feasibility model to test the potential impact of IZ on the supply of feasible capacity, particularly in the short to medium term.

Other matters raised:

- housing quality is important, such as greenstar rating
- provide education that promotes environmentally and affordable homes especially to developers /providers of homes including providing a free eco-design service
- the council should incorporate accessibility into the strategy and action plan particularly by promoting Universal Design and the Lifemark® standards to ensure accessible housing options are increased
- acknowledgement of affordable home partnerships such as kiwibuild, Queenstown Lake Community Housing Trust and how they will work and fit in with the strategy
- the strategy encourages high density in greenfields due to low land costs rather than where its more appropriate and has adequate infrastructure
- should target large hotels/resort, commercial premises etc should also contribute and major employees such as ski field operators should also provide housing.

Particular Issues for consideration in the s32 evaluation

Particular issues raised through the consultation that may have an impact on the rationale and justification of any affordable housing provision under section 32 of the RMA include:

Clarity of purpose / outcome

The outcome or objective to be achieved should be well articulated. Any IZ provisions should be:

- be clear on the outcomes sought for the Queenstown Lakes District;
- not be a standalone solution and be used in tandem with other interventions targeting affordable housing (such as – the public housing build, build-to-rent, shared equity schemes, rent to buy, Kiwibuild);
- well designed and signalled well in advance (and with relative agreement across the local community and political spectrum, so that there is certainty); and
- fully consider impacts on developer behaviour.

Legislative base

Submissions questioned the legislative basis of an IZ requirement. They noted that while affordable housing as a concept might be supported through policy and objective outcomes, specific contribution mechanisms of land or money may go beyond the RMA section 5 purpose to 'promote the sustainable management of natural and physical resources', as well as Council's functions under section 31. The Council should demonstrate that the need for affordable housing is "directly connected" to adverse effects of proposed housing developments on the environment (on which it intends to impose financial contributions). Providing for Inclusionary Zoning by way of financial contributions may be ultra vires, or at least is highly contentious, and will be the subject of legal challenge. Several submissions mentioned or included a summary of the recommendations of the Auckland Unitary Plan Independent Hearings Panel and Plan Change 24 to support their arguments.

Impact of easing supply constraints.

QLDC is required to give effect to the objectives and policies of the NPSUD as soon as practicable. The extent to which enabling greater supply of housing and removing overly restrictive rules that affect development outcomes in QLDC's urban areas should first be established.

Impact on supply in the short to medium term.

Many respondents commented that IZ would discourage bank lending, add risk, there has been no consultation with developers in terms of future viability, it would encourage development in areas other than QLDC and potentially make housing more unaffordable for middle income earners. Also, it will result in increased monitoring and compliance costs.

Others, such as MfE/HUD noted that, if well-designed and signalled well in advance the cost of IZ will primarily fall on landowners in the long-term. Taking this approach, the cost is a reduction in future value gain, rather than a direct out-of-pocket cost and would get factored into land values and pricing of developable land, recognising the desired outcome from IZ. There is, however, a potential risk to short-medium term feasibility that could have detrimental impacts on the supply of housing by the market, if not managed well. Careful consideration of transition to, and implementation of IZ is essential to mitigate this potential risk.

Conclusion

21% of the emailed submissions and 71.2% of the survey respondents favoured option 4 and commented that it was better to make IZ mandatory to ensure the provision of affordable housing. The survey responses tended to be from individuals or environmental or community groups.

67% of emailed submissions and 21% of the survey responses expressed no support for any of the options, and if any of the options had to be chosen, then there was a contingent preference for

option 1. The emailed submissions were generally from lawyers representing property developers or land holders.

From all the submissions, the following common themes emerged:

- mixture of support and opposition to IZ
- possible unintended consequences such as development of greenfield land rather than existing land close to town and infrastructure due to costs, slowing housing supply
- affordable housing is a social policy issue better addressed by central government
- extent of any IZ scheme needs justification, e.g. are Resort and Rural Visitor Zones to be included
- affordable housing concerns should be addressed through removing density controls and making it easier to undertake town house developments, tiny houses and the like
- Insufficient analysis of options especially 1-3
- Need to test the potential impact of IZ on the supply of feasible capacity, particularly in the short to medium term.

Appendix A Summary of submissions: Submissions through the online survey: Queenstown Lakes District Council Planning for Affordable Housing

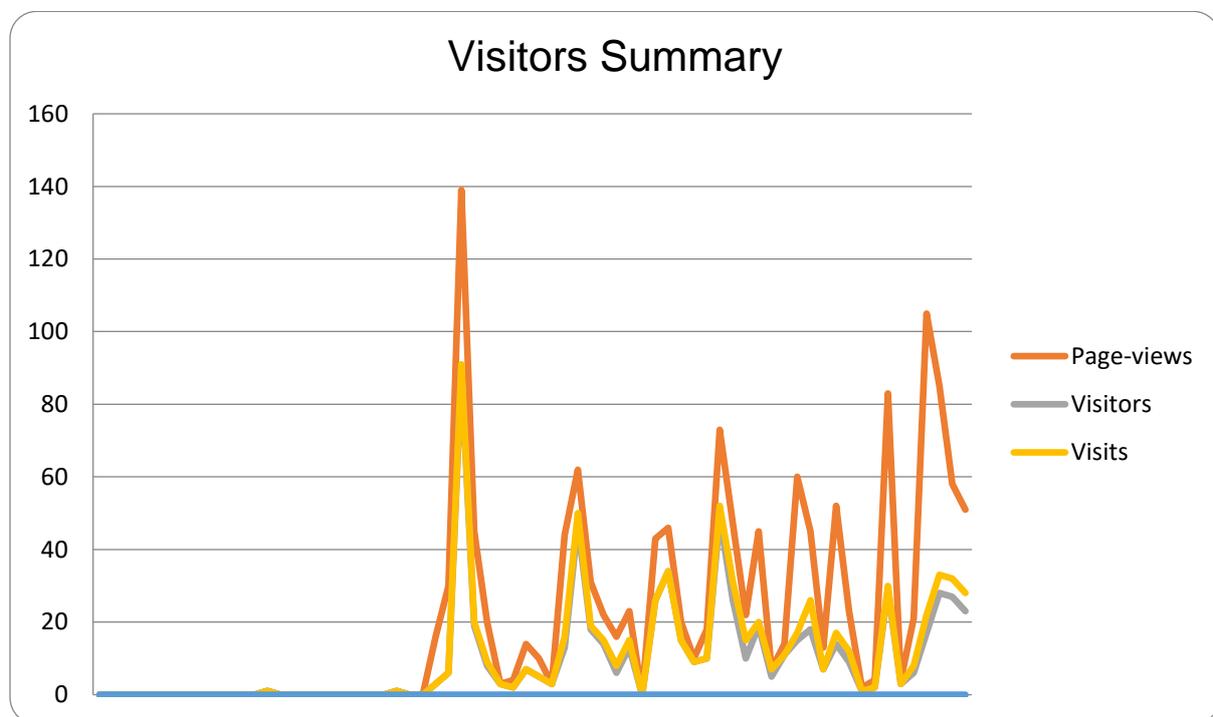
Public consultation on the Homes Strategy and affordable housing as it relates to inclusionary zoning (IZ) as a method to implement the strategy was held from 16 August to 26 September 2021.

The Council recorded 156 survey responses through the web site. This summary sets out responses via the survey. Appendix B addresses the submissions received via email.

Responses

A total of 821 visits were recorded and 156 individuals or groups participated in the survey. 113 visitors to the website downloaded documents, resulting in 276 downloaded documents. The feedback survey had 251 visitors.

Figure 1: Website Survey:



Most respondents were in the 30 to 45 age band, lived in Queenstown Lakes District and rented.

Figure 2: Age profile of respondents

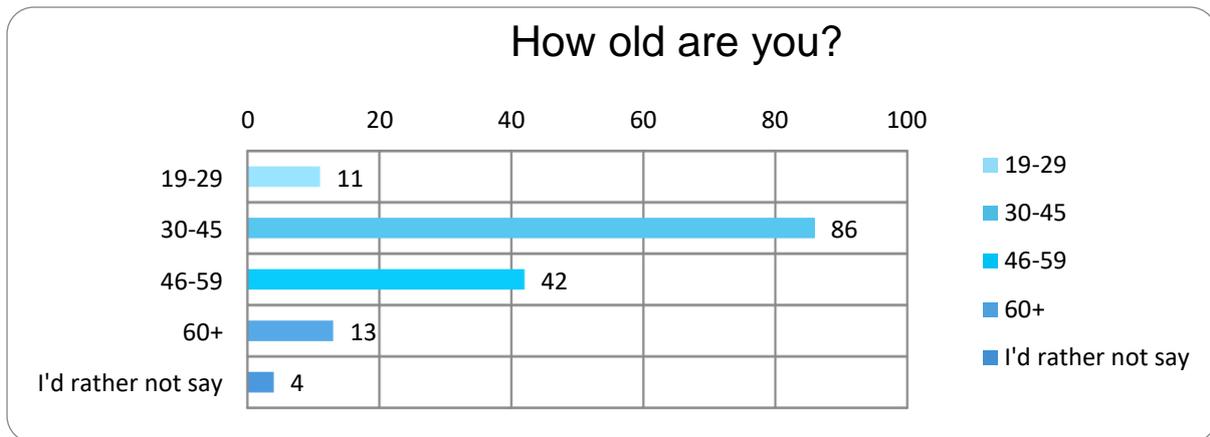


Figure 3: Home location of respondents

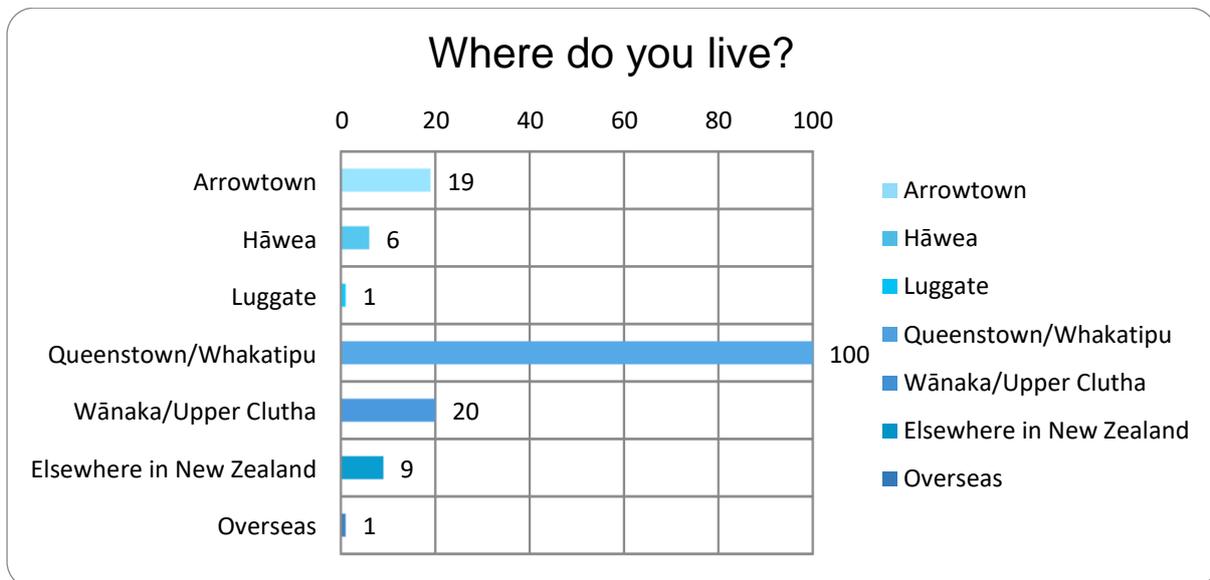
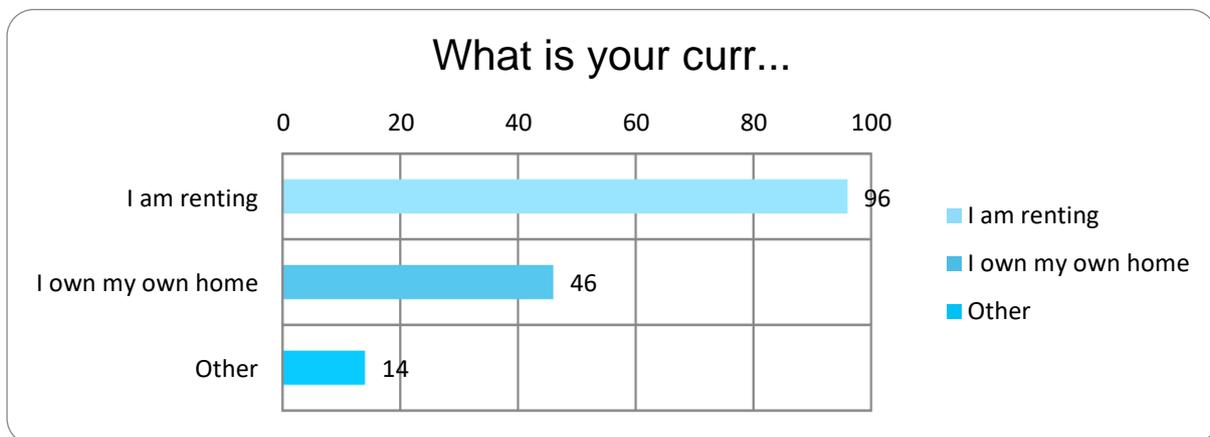
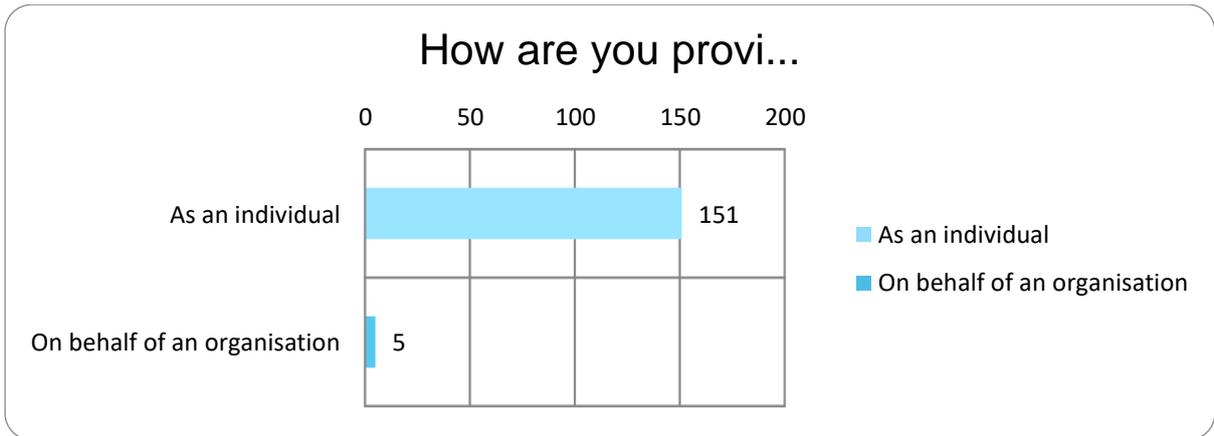


Figure 4: Current living situation



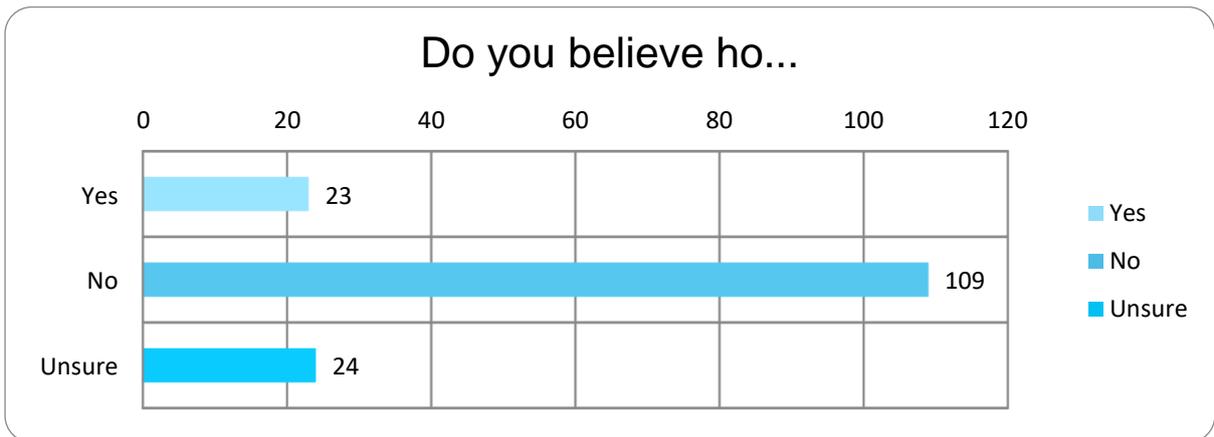
Rent	61.5%
Own	29.5%
Other e.g. assisted home ownership trust, hostel	8.9%

Figure 5: How are you providing feedback?



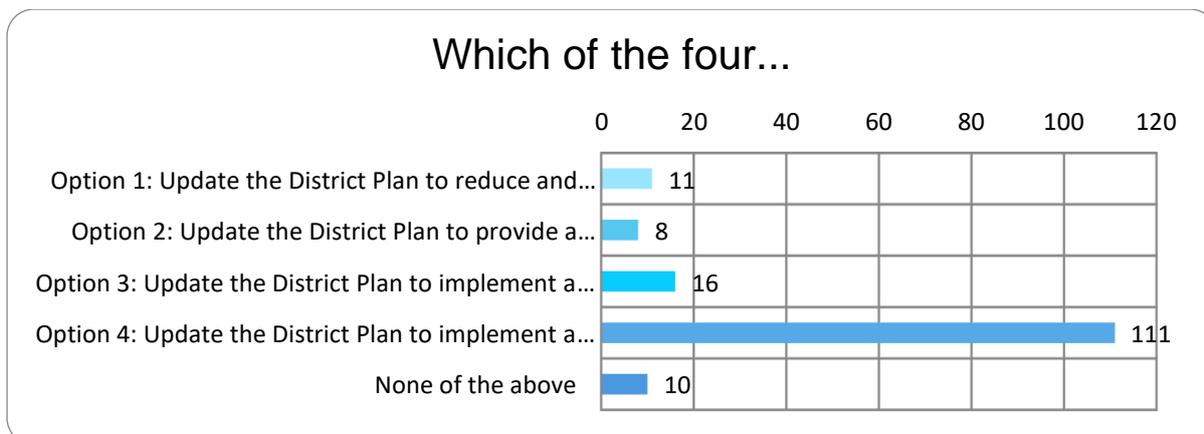
Individual	96.8
Organisation e.g. Community Housing Provider	3.2%

Figure 6: Do you believe home ownership is attainable in the Queenstown Lakes District?



No	69.9%
Yes	14.7%
Unsure	15.4%

Figure 7: Which of the four possible inclusionary zoning options is your preferred option?



Option 1	7.1%
Option 2	4.5%
Option 3	10.3%
Option 4	71.2%
None of the above	6.4%

Please explain your stance on the four possible inclusionary zoning options:

Comments	66%
No comments	34%

Common points emerging from the comments

Option 1 and 2

- Generally better to incentivise provision of affordable housing rather than make mandatory
- Change consent rules for lifestyle blocks to allow more dwellings
- Encourage higher density housing

Option 3:

- Better to make mandatory to ensure the provision of affordable housing
- May lead to degradation of existing housing stock in older suburbs
- Just apply to greenfield developments

Option 4:

- Will help ensure affordable housing is provided in the long term
- Will ensure a pipeline of affordable housing
- Provides QLDC with a leadership opportunity for rest of NZ
- Should be a preference for first home buyers to be eligible for the scheme

- This strategy will help keep people in the area
- Make a set % that developments must contribute/provide
- Provide a range of housing opportunities in brownfield and greenfield developments to enable housing options for various stages of life and circumstance
- Promote rent to own schemes

None of the options:

- It won't be effective
- It will inflate house/development costs and will be subsidising affordable housing, for example If developers are required to set aside / contribute 10% of the development to Council or an affordable housing trust then developers will have to increase their price by 10% to make it feasible, which in return simply pushes out further the cost of housing to majority of residents who won't qualify for affordable housing.
- A select few will benefit
- The provision of higher density housing will better address affordability
- Better to address wage issues
- The compliance/planning costs will increase
- Make infrastructure contributions a priority.

Do you have any suggestions that could improve any of the four possible inclusionary zoning options?

Suggestion	44%
No Suggestions	56%

Themes emerging from the comments on possible improvements

- The community housing trust is doing a great job, however simply increasing supply of zoned land won't fix the problem, housing trusts, shared equity schemes need to be further developed
- If Options 3 or 4 were adopted then it should only be for "greenfields" land not already zoned residential, i.e. rural land rezoned to residential.
- Recipients should be below a specified income threshold and/or first home buyers
- Facilitate high density housing located near public transport and parks
- Encourage resident-led developments
- Make sure there is adequate planned infrastructure
- Encourage development and densification and different typologies of housing i.e. family homes, duplexes, terrace, apartments, tiny houses wherever possible.
- QLDC should consider what incentives could be utilised to stimulate the redevelopment and densification of brownfields e.g. fast-tracked and streamlined consenting timeframes or up-zoning land for higher density homes
- Examine the possibility of "Linkage Zoning" to supplement Inclusionary Zoning
- Less red tape
- Scheme should only be for residents in the region and limit short term holiday rentals
- Increase rates on holiday houses
- Limit the amount of short term visitor accommodation able to be provided in a development
- Add more than 1,000 inclusionary zoned houses within the next 30 years.

- All developments should include affordable, high quality housing and biodiversity restoration or shared community asset.
- Do not cover all available green spaces with affordable housing (especially ladies mile)
- Impose penalties for development that is not beneficial to the community
- Should only apply to redevelopment of existing sites over 5 units
- Ensure there are options under a first house scheme
- Make sure buyers helped by the Housing Trust can't sell and profit and only help first time buyers e.g. houses stay in community
- Limit selling price of existing houses
- Incentivise affordable housing
- Percentage affordable should be proportionate to the size/number of developments
- Option 4 is more robust, likely to deliver outcome
- Council needs to provide adequate infrastructure e.g. roads, footpaths
- More efficient planning process are needed
- Increase the effective income of the low-wage members of the community.

Do you have any other comments you wish to make?

Yes	25%
No comment	75%

Other comments not already summarised:

- Affordable housing can also be enforced by other rules, such as price capping, taxes on second/third homes
- Develop Council land and other use similar initiatives practiced overseas.
- Appreciative of view being sought
- High density will exacerbate problems already e.g. traffic, private open space.

Appendix B Summary of submissions: emailed submissions: Queenstown Lakes District Council Planning for Affordable Housing

Submitter	Which of the four possible inclusionary zoning options is the preferred option?	Summary of submission points
Southern District Health Board	Support option 4	<ul style="list-style-type: none"> • Strong support for option 4 & ensure homes meet warm & dry-greenstar rating of 8. • Commend QLDC for undertaking work.
<p>Anderson Lloyd: -Jacks Point Village Holdings Limited -Bergen Trust -Glendhu Bays trustee ltd Glendhu Station Properties Limited - Henley Downs Farm Holdings Limited - Henley Downs Land Holdings Limited - Jacks Point Land Limited Jacks Point Village Holdings No 2 Limited - Jacks Point Village Phase 2 Limited - LAC Property Trustees Limited</p>	<p>Option 1 favoured Insufficient detail has been provided in the analysis of options 1 -3, as compared to the Council's preferred option 4. No clear reasoning has been provided as to why the current regime of case-by-case negotiations for affordable housing contributions has not worked. To the contrary, Council's 'Working Paper' confirms the significant proportion of affordable housing that has been made from private sector / developers to date.</p>	<ul style="list-style-type: none"> • Consider other options of non-regulatory actions such as the development of council-owned land and rate and taxpayer support for the community housing sector. • Land banking is a major issue to supply of land for housing in QLDC, and 'option 4' is likely to further exacerbate this and there has been insufficient analysis of IZ to this context. • Provisions are highly discretionary and provide for a range of percentage contributions that would vary significantly between different developments and will discourage larger scale development, potentially resulting in a reduction in the supply of housing and increased housing prices. These costs will be passed on to buyers or make development unviable. • Insufficient consultation with developers. • Potential to change previous agreements based on the assessment of planning staff, as to whether objectives are achieved, is unreasonable. • The use of the Streamlined Planning Process (SPP) is not supported as it removes appeal rights on merit. • Other options should be considered in accordance with section 32. • The provision of housing is a social policy issue and should not be addressed under the RMA. The strategy goes beyond the section 5 purpose to 'promote the sustainable management of natural and physical resources. It is potentially vires and has not been tested by the Court system. A territorial authority has functions under Section 31 of the Act to control any actual and potential effects of use, development, or protection of land. The functions of the

Submitter	Which of the four possible inclusionary zoning options is the preferred option?	Summary of submission points
<ul style="list-style-type: none"> - Lane Hocking - Maryhill Limited - Mount Cardrona Station Village Limited - Mt Christina Limited - Universal Developments Hawes Limited - Universal Developments Limited - Willow Pond Farm Limited 		<p>territorial authority, therefore, do not relate to the positive provision of services for the public but relate to controlling adverse effects.</p>
<p>Cardrona Village Limited: James Gardner-Hopkins</p>	<p>Don't support any option,</p>	<ul style="list-style-type: none"> • The consultation is flawed and unlawful as QLDC has not included as an option for feedback that there should be no Inclusionary Zoning and therefore is significantly skewing the feedback to focus on the options provided. • Inclusionary Zoning is outside the scope of the RMA. Council have not demonstrated that the need for affordable housing is “directly connected” to adverse effects of proposed housing developments, on the environment (on which it intends to impose financial contributions). • The financial contributions it proposes to impose are not proportional or fair to all developers, it's efficiency or effectiveness has not been tested, nor the added cost to developers and buyers. • Alternatives could include rating increase that spreads the burden more equitably across the entire rating base (current and future) while also targeting those who might appropriately contribute more. • Providing for Inclusionary Zoning by way of financial contributions is ultra vires, or at least is highly contentious, and will be the subject of considerable challenge. • The SPP process is inappropriate in the circumstances. If the Council persists with any Inclusionary Zoning option, then it should be progressed through the usual Schedule 1 process, not the SPP process.

Submitter	Which of the four possible inclusionary zoning options is the preferred option?	Summary of submission points
Gibson Valley Station James Gardner-Hopkins	Don't support	<ul style="list-style-type: none"> In addition to above the submitter seeks exclusion of the Resort and Rural Visitor Zones from the proposed financial contribution provisions.
Kingston Flyer interests James Gardner-Hopkins	Don't support	<ul style="list-style-type: none"> In addition to submissions above the submitter considers that enabling an exemption process for development that has some other social good, such as to support historic heritage (like the Kingston Flyer).
Others James Gardner-Hopkins	Don't support	<ul style="list-style-type: none"> Council has not made its retrospective intentions clear in its consultation for the bringing in of the Inclusionary Zoning tax.
Fulton Hogan Land Development Limited (FHLD) Town Planning Group	Strongly opposed	<ul style="list-style-type: none"> The consultation process is fundamentally flawed. The Inclusionary Zoning options 1-4 are all opposed. Increased densities within the District Plan (through up zoning, greenfield zoning or other means), or through supportive actions associated with infrastructure / transport provide a more direct response in terms of increasing the supply of residential units, assisting in housing affordability. The Government's response is considered the most appropriate responses to addressing the issues of housing affordability in New Zealand. The RMA reforms may affect housing affordability measures. FHLD consider that the compulsory acquisition powers, and associated compensation requirements of the Public Works Act 1981 represent a far more appropriate and fair response than the preferred option for inclusionary zoning. Providing for Inclusionary Zoning by way of financial contributions is ultra vires, or at least is highly contentious, and will be the subject of considerable challenge e.g. AUP IHP process. Council has not made its retrospective intentions clear in its consultation for the bringing in of the Inclusionary Zoning tax.

Submitter	Which of the four possible inclusionary zoning options is the preferred option?	Summary of submission points
		<ul style="list-style-type: none"> • It will increase the costs of housing for the vast majority of the community.
Todd & Walker Law	Option 3 should be implemented instead of or alongside Option 4 to enable developers to provide for affordable housing themselves.	<ul style="list-style-type: none"> • Considers that if the provisions are going to be proposed they should only apply to any new zoning or resource consent granted following the provisions having legal effect. • This would enable developers to provide for affordable housing themselves rather than paying a financial contribution to Council.
Remarkables Park Limited Brookfields lawyers	Does not support any of the options proposed by the Council. It considers that Option #1 is preferable (the status quo) provided it is linked to urban residential development.	<ul style="list-style-type: none"> • The vires of the proposed provisions was never ultimately resolved and recent comments in respect of the Auckland Unitary Plan process cast considerable doubt on the vires of such provisions (as set out in the summary of the recommendations of the Auckland Unitary Plan Independent Hearings Panel regarding proposed affordable housing provisions). • Questions the timing of Council proposal and fails to address the impact of Covid. • Potentially result in increased costs, increased monitoring and compliance costs and increase housing prices. These costs will be passed on to buyers or make development unviable. • Affordable housing is a central Government matter not something to be applied district by district. • RPL would recommend that the Council actively engage in discussions with developers on the issue of affordability and alternative potential solutions. • Enable appropriate and diverse housing as per DP review & improve council regulatory processes.
Nadia Lisitsina, Jacks Point	does not support any of the options proposed by the Council as is not definitive and lacks solutions	<ul style="list-style-type: none"> • Major disadvantages of all proposals is costs being passed onto to buyers. • May see high density encouraged in green fields due to low land costs rather than where its more appropriately zoned and has adequate infrastructure. • Should target large hotels/resort, commercial premises etc should also contribute and major employees such as ski field operators should also provide housing. • Prioritise housing for key workers.

Submitter	Which of the four possible inclusionary zoning options is the preferred option?	Summary of submission points
Trojan Helmet Limited and Boxer Hill Trust Rebecca Wolt Barrister	Support intent overall and if affordable housing provisions are to be included in QLDC's Proposed District Plan then prefer option 1&2	<ul style="list-style-type: none"> • Regulation should be left to central government to ensure a consistent and equitable approach. • Council's evaluation in part 7 of the Issues and Options – Planning for Affordable Housing document (21 June 2021) does not establish any clear relationship between new residential development and lack of affordability. • Provide for compact and integrated urban forms. • If Option 4 is pursued by the Council, it should have a clear future commencement date so that all downstream costs can be factored in accurately prior to land purchase by the developer. • The provisions under any option should not apply to the PDP's Resort Zones • If the inclusionary provisions under Options 3 or 4 are to be included in the PDP, it should be explicit that the provision for staff accommodation in the resort zones would satisfy the strategy's intent. • The provisions should not apply to rural residential development because there has been no analysis of the impacts of the proposal on this type of development. • The SPP process is inappropriate in the circumstances.
Rachel	Support making it mandatory	<ul style="list-style-type: none"> • Ensure housing is available for local families not holiday homes.
Deb Beadle	Support option 4	
Cath Gilmour	Support option four	<ul style="list-style-type: none"> • Agree brownfields sites should be included.
Southern Planning Group ("SPG") on behalf of NTP Development Holdings Limited ("NTP")	Support option 1&2 with more information needed on both	<ul style="list-style-type: none"> • Support incentive based schemes e.g. options 1&2; options 3-4 will increase costs and be passed onto purchasers. • No acknowledgement in council's analysis of role of affordable home partnerships e.g. kiwibuild. • Alternatives such as removal of DP controls e.g. allow greater heights and min densities in identified areas e.g. town centres and rebates.

Submitter	Which of the four possible inclusionary zoning options is the preferred option?	Summary of submission points
Shaping Our Future Inc	Support option 4	<ul style="list-style-type: none"> • Ensure conditions on resultant affordable housing to enable them to be permanent. • Compulsory inclusionary zoning contribution be applied to be appreciably higher than the 5%. • Restrict the proportion of new developments or redevelopments to no more than 10% Residential Visitor Accommodation.
Susan Rowley	Support option 4	<ul style="list-style-type: none"> • Ensure conditions on resultant affordable housing to enable them to be permanent. • Maintain a balance between providing accommodation and preserving landscape features.
RCL Henley Downs Limited ('RCL') John Edmonds & Associates	Support subject to proviso	<ul style="list-style-type: none"> • Exempt developments from Affordable Housing provisions where agreements with QLDC for the provision for affordable housing measures already exist.
Ministry of Housing and Urban Development (HUD) and the Ministry for the Environment (MfE)	Support Option 1 and 4	<ul style="list-style-type: none"> • MfE would prefer to see some level of option 1 included within option 4. • Use of SPP would require discussions with MfE to ensure that it aligns with key criteria and gives effect to the National Policy Statement on Urban Development 2020. • Advantages of using Queenstown Lake Community Housing Trust in any ongoing implementation of IZ in Queenstown and policy and procedures required. • Quantifying the potential impact from the proposed IZ policy in terms of the scale of retained affordable housing and the most efficient use of land i.e. type of housing. • Other initiatives and tangible planning mechanisms (e.g. exclusionary zoning policies) should be pursued. • Using feasibility model to test the potential impact of IZ on the supply of feasible capacity, particularly in the short to medium term.
Russell McVeagh For Winton Property Limited ("Winton")	Does not support any of the options	<ul style="list-style-type: none"> • Considers this tax would place further financial constraints on developers and will limit the supply of housing, which is central to housing affordability. • Contrary to the National Policy Statement on Urban Development 2020.

Submitter	Which of the four possible inclusionary zoning options is the preferred option?	Summary of submission points
		<ul style="list-style-type: none"> • Focus on removing constraints to the supply of housing. • Contrary to the (Enabling Housing Supply and Other Matters) Amendment Bill.
Queenstown Lakes Community Housing Trust (QLCHT)	Support outcome 4	<ul style="list-style-type: none"> • QLDC should update the District Plan to implement a mandatory contribution to include some retained affordable housing – applied to both new development and redevelopments (Option 4).
CCS Disability Action	Does not specify	<ul style="list-style-type: none"> • Recommend that the council incorporate accessibility into the strategy and action plan particularly by promoting Universal design and the Lifemark® standards to ensure accessible housing options are increased.
Protect our Winters	Supports all of the options	<ul style="list-style-type: none"> • Ensure there is adequate long-term rentals to a liveable standard available and place a tax on long term empty houses. • Developers responsible for funding community facilities. • Scrap or ease covenants on new builds. • Provide affordable high-density housing that have high energy efficiency and insulation standards. • Increase access to worker accommodation and look to overseas examples.
Queenstown-Lakes District Chamber of Commerce & Industry	Option 1 &2	<ul style="list-style-type: none"> • Doesn't support IZ & should not be mandatory for private developments, should be voluntary and rewarded with incentives. • Should advocate for central government support for IZ.
Willowridge Developments Ltd	Does not support any of the options	<ul style="list-style-type: none"> • IZ will create a barrier to development & will make housing affordability worse. • Work with developers to achieve affordable housing & meet with developers prior to progressing strategy to discuss solutions.
Flightplan 2050	Doesn't specify	<ul style="list-style-type: none"> • Include in strategy the densification of Frankton Flats. • DP is too rigid and too costly to build quality design. • Empty holiday homes contribute to housing affordability issues and should be discouraged.

Submitter	Which of the four possible inclusionary zoning options is the preferred option?	Summary of submission points
		<ul style="list-style-type: none"> • All strategies are a tax on development. Council should promote compact housing choices and form alliances to achieve affordable housing. • Supports provision of zoning for mixed housing types including single level housing suitable for retirees. • Agree make affordable housing provision mandatory and ensure its available for local families as permanent homes.
Home Performance Training Programme	Does not support any of the options	<ul style="list-style-type: none"> • Provide education that promotes environmentally and affordable homes especially to developers /providers of homes including providing a free eco-design service to encourage smaller, efficient, well located, eco-friendly homes & diverse neighbourhoods. • Fund repairs & maintenance for low-income homeowners. • IZ will make housing affordability worse and encourage urban sprawl. • Large employers should also contribute to IZ such as ski field operators and should also provide housing. • Identify & prioritise key workers who will benefit from IZ policies.