

Responses to Affordable Housing consultation June – July 2007

Consultation was approved by Strategy Committee on 9 May 2007 on the following documents:

1. Plan Change 24: Working Paper One
 - This paper discussed the key concepts that the Council envisaged for an Affordable Housing Plan Change and established a preferred direction.
2. Document A: Applicant Eligibility Criteria
 - Updated version subsequently incorporated into the update to the HOPE Strategy as Part A – Applicant Eligibility Criteria
3. Document B: Guidance for Developers
 - Updated version subsequently incorporated into the update to the HOPE Strategy as Part B – Guidelines for Development

Consultation ended on July 13 2007

The comments received are summarised (by document), with draft officer responses, in the table below. (Note – officer responses reflect the thinking at the time of the comments were considered – they may not necessarily reflect current thinking or resultant draft policy).

General comments

Submitter	Comment	Decision Requested	Officer Response
Bill King	In the 1960s, 70s, and 80s, the Lake County Council in association with Land and Survey very successfully recognised and facilitated, balloted residential section sales for first home, low income couples, in Wanaka (details followed)	Note the historical attempts to address housing need and consider whether ideas still have validity for current approach	Comments noted.
Bill King	<p>In Wanaka, Council has an ideal opportunity to lead by example with some sections available in Scurr Heights now. The location in close proximity to the schools and to the proposed new Wanaka Primary School is ideal.</p> <p>Council does not have to purchase the sections. It may be they require resurveying to say 700m to 750m . A suitable size to build a basic 3 bedroomed home with room for a garage, outdoor area and garden etc.</p> <p>An immediate start to build homes on say six Scurr Height sections through a Trust which would be formed using the formula proposed by Dr Dennis Pezaro and detailed in his correspondence addressed to Rhondda Poon, Central Lakes Trust on 2 / 2 /2006.</p>	Consider developing community housing at Scurr Heights	Comments noted. The Community Housing Trust is pursuing discussions with the Council for the possible use of Scurr Heights
Bill King	Was very disappointed at the lack of genuine intent, desire or understanding from a number of our elected representatives on Council and the Wanaka Community Board, to accept it is their responsibility to give	Note comment	Comment noted.

	more than political lip service to the largest social problem we have in the forums and focus groups held to date.		
Bill King	The various options and information presented by Scott Figenshaw at a forum in Wanaka in December were constructive and encouraging in the fact we now have an Affordable Housing Trust in place.	Note comment	Comment noted
Bill King	Notes the Government has committed some funds to set up a Trust for Queenstown. Would like to see this extended to Wanaka.	Extend scheme to Wanaka	The shared ownership scheme is for the Queenstown Lakes District – this includes Wanaka and other parts of the District. It is anticipated that there will be homes created for households in Wanaka as part of the scheme.
Nick Clark	Recounts experiences of scheme in Jackson, Wyoming: there are very strict laws on the resale and what level of capital gain can be acquired. Interested in seeing QLDC's position on this as believes it needs to be strongly controlled. Affordable housing is not a way for those involved to make a large profits on the inflated market in the QLDC area. This will be difficult with New Zealanders obsession with investment housing but important believes your role is a very important one for the future of sustainable communities in this area.	Note comment. Ensure that Document C adequately prevents speculative purchasing.	The Council agrees with this position and a balance will be sought offering different products that ensure the meeting of housing need and in some instances allow purchasers to receive a appropriate return on their investment in proportion to their ownership stake. Document C is still being drafted and will be released for consultation later this year (at the same time as the Plan Change), while the Plan Change will require long-term retention. Products that the Trust and Council are considering include a Shared Ownership scheme in which the amount of capital gain the occupant will make will be uncapped and a leasehold product where the potential capital gain will be capped.

<p>Julie Crosswell, Housing Innovations Project Manager, Housing New Zealand Corporation</p>	<p>Has worked with the Council over the last 18 months to assist in establishing the Trust and has worked with the Trust on setting up Shared Ownership scheme. Accordingly has read the three documents and considers them well thought through, comprehensive, professional and very relevant for the particular issues faced in QLD. Impresses with the Council's Strategy and the drive and determination to deliver actions and goals. Believes the Council is on the right track and looks forward to a continued working relationship with the Council and Trust.</p>	<p>Note Comments</p>	<p>Comments noted.</p>
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PC 24 – Working Paper One comments

Issue	Submitter	Comment	Decision Requested	Officer Response
Definition of community housing	John Darby	<p>Considers the distinction between social and community housing needs is not appropriate. I believe any financial contributions raised by policy under the provisions of the RMA Act cannot easily (or defensively) elect to provide one category of social housing over another. For example, funding of affordable housing over social needs housing such as elderly or emergency family care etc. My personal viewpoint is Council should be more pro-active in its policy development in the critical social housing area and certainly not believe this is a solely a Government responsibility. Queenstown's' stock of aged care units is among the lowest in New Zealand on a proportional residential basis. I maybe ignorant of initiatives in this area but the policy seems slanted heavily to the simple issue of "affordability" as opposed "accommodation". Prefer to see a wider definition of Community Housing that includes social housing requirements that acknowledge it's the community's responsibility to house its elderly, or its disadvantaged inside its own community</p>	Widen the consideration of community housing to include sheltered housing, such as elderly care housing.	<p>The HOPE Strategy was founded on the recognition of the increasing problems of recruiting and retaining a workforce in the District and the role that housing affordability plays in this. Within the statutory limits of the RMA the Council's advice is that at this stage a requirement of affordable housing would need to be proportionate and reflective of the effects of that development. Although it is recognised that there is a need for 'social' housing (referred to here as 'sheltered housing') it is difficult, and has not been attempted, to provide a link between the elderly housing needs that a development creates as opposed to employee needs. It could be argued that the elderly housing needs are a concern of the wider District. The concerns of the commenter are however noted and it is considered that this can be addressed through other work streams or revisited if other regulatory tools become available.</p> <p>It is also notable that we have sought to address accessibility issues via Doc B criterion 7 so that people should ideally be able to stay in their houses for longer before requiring sheltered housing.</p>
Determining the level of Contribution	Anderson Lloyd	Development contributions or any other form of financial contribution	Exempt affordable housing allotments	This will be considered as part of the 'Stage 2' of the Council's work on community housing which

		should not be levied or otherwise applied to any allotment given over to affordable housing.	from development contributions.	will explore the possibility of development contributions
Determining the level of Contribution	Anderson Lloyd	Previously levied figures of around 5% of the retail value to be given over as affordable housing contribution can equate anywhere between 20-40% of the project profits. This seems an unfair, unjust and unrealistic expectation. Developers do not have any confidence that the Council or the Community housing Trust have an informed understanding of the economics of property development.	Note comment and consider development economics in the setting of any financial contribution levels.	Members of the Trust, the Council and consultants used in this project to date have a very well informed understanding of the economics of development. The exact nature and scale of contribution (which may or may not be financial and may depend of the type of development) is yet to be decided. This will be considered as part of the 'Stage 2' of the Council's work on community housing which will explore the possibility of development contributions. The Council has signalled its intent to investigate means in which the costs of contributing community housing can be offset – perhaps by increasing developable potential in areas that contribute affordable housing.
Determining the level of contribution	John Darby	10-30% of the total developments residential units as Community Housing" – this maybe economically unsustainable for the greenfield development model given the very high costs of land, infrastructure development, existing financial contributions and non recovery of GST in residential product. In effect the cost of this added financial contribution will be added to market pricing, receive GST and further widen the affordability gap. I know this is a universal issue and perhaps a circular argument. However it's the way the contribution value is created that is the key issue, e.g. a 10 ha block of land is to be zoned	Note comments and reconsider the appropriateness of the 10-30% target	Comments noted. A demand study is underway to determine what the level of need is in the district. It is expected that an Affordable Housing Impact assessment will then be undertaken with the intention that the community housing contribution reflect a set proportion of the level of need the development generates.

		residential, Council may “market” zone 9ha and require 1 ha to be restricted to provide for community benefit. It is easier to give away value before you receive it, not after.		
Determining the level of contribution	John Darby	Once development entitled property is traded on, any community housing requirement is simply factored in as a development cost. Development zoning should be on a proposition basis where a “scorecard based on community” and environmental benefits determines success not historical land ownership or “developer driven” visions.	Note comments and consider changes accordingly.	Comments noted. These ideas can be explored further as part of ‘stage 2’ of the work which will explore financial contributions.
Developer Contributions	Mitchell Partnerships on behalf of Willowridge developments	Allowances should be made within the Plan Change to negate the need for affordable housing contributions where excessive development costs can be demonstrated. This may include the requirement to undertake site improvement or remedial work such as stabilisation, flood protection, decontamination, or to facilitate major supporting infrastructure elements such as new schools.	Write policy in PC so that flexibility in the amount of contribution exists where excessive costs are demonstrated.	A developer already has to consider these matters and they should be considered at the time of scheme proposal and/or the purchase of land.
Effect on affordability of market housing	Anderson Lloyd	Whether Council recognise it or not the costs associated with community housing will be passed on through the development process to the end consumers – it will be the buyers of new non-community housing that will subsidise the community housing.	Reconsider plan change in light of comments.	In the HOPE strategy the Council assessed these issues and concluded that the scale of the affordability problem was such, and the prospect of the market addressing the issue so unlikely, that using the District Plan to require development to deliver affordable housing is appropriate. The Council is investigating means in which any additional costs can be offset by

				other development gains. It should also be noted that if additional costs are incurred the opportunity exists for developers to absorb some of the costs as well as pass it on to the purchaser.
Effect on affordability of market housing	Anderson Lloyd	All housing prices are set by the cost of developing new residential sections and the price to put a new house on those sections. Thus the property market generally is inflated by the additional compliance costs, such as developer contributions, in bringing new product to market.	Reconsider validity of plan change	The intention of the plan change is to mitigate the effects of the increased employment requirements of new development so that development mitigates a proportionate amount the effects it will have. It is considered appropriate that the development internalises its effects and accounts fully for the cost that the wider community bears. The costs that the wider community could incur are the economic effects of employee recruitment and retention issues or potentially the use of rates or taxes to directly address the issue of affordable housing.
Effect on the affordability of market housing	Anderson Lloyd	The imposition of a selectively defined 'affordability' component effectively increases the price of every newly created allotment in a subdivision and benefits only a select few. Thus the imposition of an affordable housing requirement on developers has a reverse effect to what is desired.	Abandon the approach of requiring community housing is the District Plan in its current proposed form.	In the HOPE strategy the Council assessed these issues and concluded that the scale of the affordability problem was such, and the prospect of the market addressing the issue so unlikely, that using the District Plan to require development to deliver affordable housing is appropriate. The Council is investigating means in which any additional costs can be offset by other development gains. It should also be noted that if additional costs are incurred the opportunity exists for developers to absorb some of the costs as well as pass it on to the purchaser.
General comment	Bill King	Supports the philosophy and intent and believes there is positive support for the linkage zoning scheme from developers.	Note comment	Comment noted
General comment	Five Mile Holdings Limited	It is inappropriate for the company to comment further in detail at this stage due to separate negotiations	Note comment	Comment noted

		occurring. Reserves right for future comment.		
General comment	Anderson Lloyd	The way in which the affordable housing initiative has been implemented to date has meant that developers seeking a Plan Change have had little opportunity other than to agree. If the Council is to lend its support to a Plan Change to provide for residential development, an affordable housing component/contribution was the quid pro quo. The developers feel that if they had not agreed to an affordable housing component they would not have received Council's support. They feel they had little choice but to agree to Council demands in this regard. The result is that the land would not be developed. This is seen as an untenable proposition when there is obviously a market demand for residential land. This is unfair given that there is no statutory basis for the affordable housing requirement, or certainty from the outset as to how the affordable housing initiative would be managed and operated.	Note comment	It is correct that the Council has sought to date affordable housing contributions as part of stakeholder agreements in which the Council has undertaken plan changes that will bring about financial advantage to a developer. The intention is now to standardise the requirement of community housing to a wider range of specified development meaning that this case-by-case negotiation will be uncommon.
General comment	Comments raised in the Urban Design Panel meeting re Doc B (included members of the	Opinion that market is moving towards 'affordable housing'	Reconsider the need for the plan change	This opinion is not supported by the evidence that is continually reviewed by the Council – housing is becoming increasingly unaffordable and the actions identified in the HOPE Strategy remain appropriate.

	development community)			
General comment	John Darby	Community benefit criteria should be incorporated into the District Plan as a cornerstone policy for approving private plan changes. Retrospective community housing requirements on already development zoned land will not work. The focus should be on the forth coming round of privately initiated plan changes.	Make changes to the District Plan saying that community benefit will be required in order to approve private plan changes. Ensure that community housing is required at the time of plan change and not at the time of resource consent application.	The Council will need to consider private plan changes on their merits and it would seem that the most efficient way to require community housing is through a comprehensive plan change rather than case-by-case consideration. Plan Change 24 will in effect provide criteria for assessing Plan Changes and non-complying activities – at this stage retrospective changes to existing zoning is not being considered.
General comment	John Darby	The Councils' initiative of Community Housing is welcomed. The work to date is very well researched and has been wisely distilled into easily understood concepts that provide a complete summary of the "best practice" models. The only note of caution I offer is to keep it simple and grow the concept sustainably as Queenstown is a small community and affordability of the very schemes themselves need to be well considered. The development cycle we are in may not be repeated for the next 10 or 20 years as we are nearing capacity in so many areas, ski area capacity, primary roading, infrastructure, airport footprint etc. The model cannot be singularly based on an expectation that all will be funded	Note comment	Comment noted

		by future development.		
General comment	Nick Clark	Notes that the inclusionary zoning method used in the US maybe easier to administer but with the difficulties of working that through the RMA I see how the Linkage zoning would fit better into our existing laws	Note comment	Comment noted. Inclusionary zoning is not considered possible at this stage due to current statutory limitations
General comment – suitable community housing products	Nick Clark	Notes experiences of Jackson Wyoming – 3 levels of community housing. The first level has higher levels of contribution from the trust and accordingly has greater restrictions on the level of capital gains one, can make on resale, next level smaller contributions from the trust and accordingly higher level of capital gain the last level is open market anything goes. Those living in the community love the mix, you have young families starting of right through to those who are well settled and have built substantial houses, 2 mill+	Note comment	Comment noted. The Trust will have scope to further explore such issues.
Housing Need	Mitchell Partnerships on behalf of Willowridge developments	<p>The HOPE strategy projects the demand for affordable housing for the next 10 years. Working Paper One states the Council will produce a housing needs paper analysing supply and demand at 5-yearly intervals.</p> <p>We consider this to be insufficient. Affordable housing contributions should fundamentally be linked to need. A review should occur every 6 months and contributions should</p>	Commit to a six-monthly housing needs assessment	The degree of housing need identified in work to date is such that it is highly unlikely that the District's housing need would be met within 5 years, let alone there be significant change within 6 months. One option maybe to have a yearly update with input of new figures (as opposed to a complete reassessment), however, if policy is established via the District Plan as is intended it would seem unrealistic to expect Plan Changes more than every 5 years on this issue.

		be fundamentally linked to need.		
Linkage Zoning	Mitchell Partnerships on behalf of Willowridge developments	<p>Not persuaded that linkage zoning is most effective and appropriate approach if applied to zoning (as opposed to resource consents).</p> <p>At RC time it is possible to estimate the number of employees but this is less appropriate for zoning as there are substantial disparities in the employment generation for different businesses covered by the same zoning.</p> <p>Within the retail area of the proposed Three Parks Plan Change in Wanaka, the developer anticipates a large format (approx 1 employee per 90 square meters) and small format (approx 1 employee per 20 square meters). Within the large format area a supermarket might be expected to require 1 employee per 19 square meters while a non-food supermarket would produce 1 employee per 90 square meters, (further details given as to floorspace requirements)</p> <p>These uncertainties flow onto the income profile of the jobs created and subsequently working out an appropriate contribution.</p>	Suggest that the community housing should be based on a percentage of any residential elements of the rezoning.	Council has been advised that the linkage zoning approach is the most likely way in which to be able to achieve its goal mitigating the effect of housing need in future developments through RMA processes. The comments are noted and it is possible that Central Govt's Housing Affordability Bill may assist with inclusionary zoning, but this is not as yet known.
Linkage Zoning	Mitchell Partnerships on behalf of	The preferred direction seems to unduly target employment generators who should be encouraged	Adopt inclusionary zoning approach that targets housing	Council will need to consider this issue, however it is noted that a lack of affordable housing is a serious economic constraint for businesses (due

	Willowridge developments	to the District for the benefit of the economy and not burdened in providing affordable housing.	developers instead of employment.	to recruitment issues) and that employing businesses will benefit from the existence of community housing. Conversely, it could be argued that it is inappropriate for other sectors to subsidise the provision of community housing for the benefit of employing businesses. The Council's preferred direction is attempting to mitigate the effects of a development by internalising them. The Council will work with Central Govt on the Housing Affordability Bill to promote the availability of such a tool.
Need for certainty	Anderson Lloyd	Developers need a clear, easily understood calculation framework so that when assessing the feasibility of a project the costs for community housing can be established. Unfortunately this is not what is proposed. The method of assessing the number of jobs to be created in a development, determining their income profile and then assessing their housing needs is far too subjective and will only lead to developer's experts (because they will need to employ yet more consultants to prepare reports on this) debating with Council's over what is the correct result. There needs to be a simpler way that means the community housing costs of a development can be quickly and easily established at the outset and that ensures they will be the same for everyone.	Note comment and ensure that the Plan Change gives clear guidance on the level of community housing required.	The comments on seeking certainty are noted. The Plan Change to be notified will explain these issues in more detail and provide clearer guidance on how the calculations will be made.
Need for certainty	Anderson Lloyd	The plan change is far too vague. When a developer is faced	Note comment and adjust Plan Change	The Plan Change as consulted on was only a working paper which established draft Objectives

		with rules like this it means risk because (again) of the uncertainty of what the rules mean, and what the outcome and cost will be. This links to the comments above regarding the contributions assessment needing to be simplified and more certain.	according	and Policies for the public discussion. The Plan Change to be notified and S32 report will provide more information.
Validity of plan change	Anderson Lloyd	Developers have a fear that if they are to resist affordable housing initiatives in the future, particularly if these requirements are enshrined in the District Plan and other statutory documents, they will strike difficulties in having resource consents or plan changes approved. The fear is that affordable housing will be wielded like a big stick by Council and that non-compliance with the provisions will make development difficult, even development of residential lots which we intend to release at an affordable level and which by definition are 'affordable.'	Reconsider the appropriateness of the plan change	The intention is indeed to make affordable housing a requirement (either at the resource consent or plan change stage or both). Non-compliance with rules will be dealt with like non-compliance any other District Plan rules. The Plan Change is being pursued because evidence is showing very little or no housing or residential land is becoming available that could be deemed 'affordable' by standard definitions.
Validity of Plan Change	Anderson Lloyd	More research is required. It is not appropriate to co-opt overseas experience and seek to apply it in a New Zealand context and in particular the Lakes District, which is unique within New Zealand. The question of whether it is appropriate at all for local government to be	Do not advance the plan change until more research has been undertaken	Considerable research has been undertaken to date and continues to be undertaken in order to develop appropriate systems and institutions to deliver and manage community housing. Overseas experiences do indeed provide a rich source of experiences and information but the Council recognises the particular circumstances of the NZ planning and governance systems and the Queenstown Lakes District's circumstances.

		<p>undertaking a role traditionally performed by central government must also be seriously questioned, and this is a question that should be put to all ratepayers in the District.</p>		<p>The HOPE strategy considered the particular circumstances of the District and concluded a plan change should be pursued to deliver affordable housing. Work being produced now towards a Plan Change represents the embodiment of considerable work and research and it is considered appropriate to advance the work towards the notification of a Plan Change. MfE are well informed of the Council's work and the Minister of Housing is supportive of the Council's initiatives to provide affordable housing. Consultation has been undertaken at several stages of the policy development and ratepayers and all others who wish to comment will have the opportunity to do so during the formal consultation period for PC 24.</p>
<p>Worker/employment accommodation</p>	<p>John Darby</p>	<p>I am firmly of the view that worker/employee accommodation should be the prime responsibility of the employer, not the community. There will be shortly an oversupply of substandard visitor accommodation units that will move down market to provide affordable staff housing. Resident and family housing and special needs housing should be the priority.</p>	<p>Remove or lessen emphasis on worker/employee accommodation</p>	<p>Comments noted. This Plan Change is focused on housing households in the community. Document B: Guidance for Developers emphasises the difference between 'worker/employee' accommodation (short term) and 'resident family' accommodation (long term).</p>

Document A - Eligibility Criteria

Submitter	Comment	Decision Requested	Officer Response
Bill King	A top priority must be given to the lower income citizens with a combined income, of say under \$35,000, recognising their plight with high rentals, insecure tenancies, cost of travel to schooling, employment, health services, sporting activities etc. and their inability to claim tax benefits from GST, vehicle running, and other business perks available to some.	Note comment. Consider targeting more properties at the lower income level.	Comment noted. The draft Plan Change is suggesting that 40% of households in the less than 60% AMI band, which includes the lower than \$35,000 income households suggested by the submitter. Is notable that due to the approach of Linkage Zoning that the Council considers necessary to take, the affordability of the houses needs to largely reflect the income profile of the employees of a development that will be in need of community housing.
Bill King	Applicants should demonstrate they are married, or in their affidavit of application, confirm their intent to marry prior to obtaining title and possession of an Affordable Trust Home. Partnerships are not sufficient.	Require couples to be married or intending to marry to be eligible for community housing	Comment noted.
Bill King	Applicants should confirm that they have permanent employment.		Supported in Document A – section 1B
Bill King	Applicants should give a total declaration of their assets and liabilities.		Supported in Document A – Section 3
John Darby	General requirements should be backed up by a weighting or prioritizing of persons providing essential or valued community services e.g. a full time first response medic vs. part time bar worker; housing the elderly inside their long time community vs. accommodating new arrivals. Continuous occupation is another key aspect. We have considered offering subordinated suspensory loans at very low interest to assist bridge the equity gap for house purchase, e.g. \$50,000 loaned and forgiven at \$10,000 per year of occupation.		A weighting scheme is within the jurisdiction of the CHT should they deem it necessary. This matter is beyond the scope for the DP change

Document B – summary of responses

Issue	Submitter	Comment	Decision Requested	Officer Response (recommended changes in bold)
<p>Criterion 1: A development that provides community housing should as much as practicable replicate the percentage target mix of tenures and affordability set and a sub-district level.</p>	<p>Anderson Lloyd</p>	<p>It is inappropriate to apply the percentages as they apply to rental units (low and middle income), transitional rental accommodation (seasonal workers etc.) and longer term rental accommodation to every subdivision. Market forces typically do not allow for this sort of mixing of tenures and affordability – it is not appropriate to socially orchestrate the same. It is certainly not the role of Council to be involved in these sorts of social experiments.</p>	<p>Remove Criterion 1</p>	<p>The risks of allowing the creation of areas of social exclusion and the desire to have mixed and balanced communities is one of the reasons the Council opted to adopt the HOPE Strategy and set about addressing affordable housing issues. It is also considered that the best way to ensure the delivery of community housing to targets, the best way is to replicate this matter as much as possible on contributing sites (there is expected to be an inherent flexibility in the application of all criteria bearing in mind individual site characteristics). The Council's purpose under the Local Government Act from Section 10 includes:</p> <p>The purpose of local government is – (b) to promote the social, economic, environmental, and cultural well-being of communities, in the present and for the future.</p> <p>Policy with the aim of seeking socially sustainable communities is therefore considered appropriate. Similar policies have been successfully applied in other English-speaking countries so this is not considered to be 'social experimentation'.</p>
<p>Criterion 2</p>	<p>Anderson Lloyd</p>	<p>No comment on this other than to say that the more factors that need to be taken into account, the more difficult it is to make a residential subdivision viable.</p>	<p>Note comment</p>	<p>Comment noted</p>
<p>Criterion 2 – minimum space standards</p>	<p>Tricia Austin</p>	<p>Auckland City have a Proposed Plan Change 2 to the Operative District Plan (Central Area Section 2004) Part 5 : Urban Design Control and Residential Amenity Control.</p>	<p>Consider changing the minimum space requirements to the</p>	<p>It is agreed that the experience of Auckland is a useful yardstick for appropriate minimum spaces and that there are advantages the sizes in economics of development terms. Matters such as public storage may be more appropriately dealt with via amore</p>

		<p>Its sets the minimum gross floor area as:</p> <p>Studio 35 sq m 1 bed 45 sq m 2 bed 70 sq m 3 + bed 90 sq m</p> <p>The document notes that 35 x 2 = 70 and 45 x 2 = 90 - which results in modules which can be flexible within the same structural grid... something similar may be important for construction affordability for Queenstown.</p> <p>In addition, there is a requirement that in any one apartment building, the number of Studio plus 1 bedroom apartments shall not exceed 70%. Again this reflects the apartment market in Auckland CBD - but something similar may well be appropriate for QLDC.</p> <p>In addition, storage areas per apartment required in the building.</p> <p>So compared with your proposal - its not so generous. But its meant to be applied to apartments in the CBD – i.e in a very urbanised area, compared to Queenstown.</p>	recommended	general plan change. Adopt recommended change
Criterion 3	Anderson Lloyd	No comment on this other than to say that the more factors that need to be taken into account, the more difficult it is to make a residential subdivision viable.	Note comment	Comment noted
Criterion 3 (mix of social housing)	John Darby	Questions whether we should be mandating 30% of the Community Housing stock at 50m2 1-bedroom	Reconsider the figures in this criterion	Comments noted. The Council feels that the bedroom mix should reflect the profile of demand for housing that a development generates. It is conceivable that

		units. The overhang in 1-bedroom visitor units will supply this sector of affordability. The emphasis should be on 2/3-bedroom product targeting young families and social housing units.		surplus stock of VA could be used to meet the corresponding unit-type demand in some instances.
Criterion 3 (mix of units by bedroom numbers)- Figure 3 – last column: The target mix of resident / family community housing	Comments raised in the Urban Design Panel meeting re Doc B (included members of the development community)	<p>Could radically alter the make up of developments, particularly apartments. This could have positive design implications in terms of reducing repetition but concerns raised as to the implications in costs etc.</p> <p>Does the mix need to be on site? Trust could take financial contributions and distribute money towards larger (e.g. 3 bedroom developments)</p> <p>However it is recognised that the missing of communities is a socially positive outcome if reasonably obtainable.</p>	Reconsider appropriateness of the criterion.	Comments noted. Minimum unit sizes are to be adjusted to facilitate multiple units within the same structural grid. Off site provision may be negotiable in some instances.
Criterion 4	Anderson Lloyd	Developments are typically designed and built with a particular target market in mind and not every subdivision will be appropriate for affordable housing. There must be some consideration of market factors. The value and attractiveness of a piece of undeveloped land suitable for development dictates its market price and the subsequent pricing of the resultant residential allotments. To seek to apply a “one size fits all” affordable housing levy across every development does not take into account the suitability of the site for affordable	Remove Criterion 4	<p>The risks of allowing the creation of areas of social exclusion, the development of substandard housing or excessive commuting distances, and the desire to have mixed and balanced communities are some of the reasons the Council opted to adopt the HOPE Strategy and set about addressing affordable housing issues. If areas were allowed to be excluded from community housing contribution it would likely become concentrated in certain areas and disparities in socio-economic profiles of parts of the District could become apparent.</p> <p>There is expected to be an inherent flexibility in the application of all criteria bearing in mind individual site characteristics. This will be further discussed in the</p>

		housing, and in some instances it will be more appropriate to provide an affordable housing component at a different location where better value for the requirement can be obtained.		Plan Change and S32 report. Off-site provision may be appropriate in some areas.
Criterion 4 – Community housing should be provided on-site unless extenuating circumstances can be demonstrated	Anderson Lloyd	<p>As noted above, there will be developments where community housing is an inefficient and inappropriate component. Is it better, for example, to require one lot worth \$750,000 in a premiere lakeside subdivision to be given over to affordable housing, or five lots in a less spectacular location being handed over to the Trust? Obviously, in terms of maximising the ability of the Trust to house as many people as possible, the latter is the more sensible alternative.</p> <p>The ability to provide affordable housing off site or to provide cash or some other contribution should be a fundamental part of this new policy as it allows flexibility which is essential.</p>	Remove or alter criterion	<p>The risks of allowing the creation of areas of social exclusion, the development of substandard housing or excessive commuting distances, and the desire to have mixed and balanced communities are some of the reasons the Council opted to adopt the HOPE Strategy and set about addressing affordable housing issues. If areas were allowed to be excluded from community housing contribution it would likely become concentrated in certain areas and disparities in socio-economic profiles of parts of the District could become apparent.</p> <p>There is expected to be an inherent flexibility in the application of all criteria bearing in mind individual site characteristics. This will be further discussed in the Plan Change and S32 report. Off-site provision may be appropriate in some areas.</p>
Criterion 4: (Presumption of on-site provision) –	Comments raised in the Urban Design Panel meeting re Doc B (included members of the development community)	In principle mix of community housing throughout developments supported but in practicality terms difficulties foreseen.	Comments noted	There is expected to be an inherent flexibility in the application of all criteria bearing in mind individual site characteristics. This will be further discussed in the Plan Change and S32 report. Off-site provision may be appropriate in some areas.
Criterion 5	Comments	Comment that we can create	Reconsider	Separation of housing areas by socio-economic

	raised in the Urban Design Panel meeting re Doc B (included members of the development community)	communities of similar minded people by clustering community housing and that this should not necessarily be seen as a bad thing.	appropriateness of the criterion	groups is not generally supported as having desirable social outcomes – in larger urban areas lower socio-economic areas are often linked with community problems and social stigma. It is considered wise to avoid such a situation developing in the District. It also could be disputed that income groupings necessarily relate to 'like thinking'.
Criterion 5	Comments raised in the Urban Design Panel meeting re Doc B (included members of the development community)	Economies of scale – sometimes it could be worthwhile clustering them together in terms of cost efficiencies.	Reconsider appropriateness of the criterion	Comments noted, but given there is a presumption that through the application of the criteria the community housing would be of a similar nature to the market housing, there would appear to be little benefit in clustering them in terms of cost efficiencies to the developer. It is expected that there will be an inherent flexibility in the application of the criteria – the criteria would be applied within the bounds of reason.
Criterion 5 – Community housing sites should be spread through the development	Anderson Lloyd	Developers feel this is inappropriate. A developer should have the ability to create a subdivision and residential area with a particular flavour or character. It is unreasonable for community housing (over which the developer has limited control) to be spread throughout a development as it may have the effect of altering the character the developer has worked so hard to achieve. It is untenable that this hard work and vision is able to be affected by a Council decision to require affordable housing to be spread throughout it. However, where a particular development has the ability to absorb	Remove or alter criterion	The application of Criterion 6 (external appearances) effectively negates this concern. If particular character elements exist in a residential development the developer should apply them to community housing.

		appropriately a range of affordable housing, this should be done on a 'salt and pepper' basis. But it will not be appropriate everywhere.		
Criterion 5 (community housing sites spread throughout a development)	Comments raised in the Urban Design Panel meeting re Doc B (included members of the development community)	Supported as being a good idea in principle. However, less important in Queenstown given that we don't have significant existing problems of deprivation.	Note comment.	Comments noted, although it is felt that it is important to be proactive in avoiding such problems occurring in the District as the town grows and affordable housing begins to occur.
Criteria 5 and 6	Anderson Lloyd	There is a real fear amongst the developer community that affordable housing spread across every subdivision will have the uniform effect of lowering the appearance and value of a product that a developer has tried so hard to create. However, whenever possible, and taking into account market forces, consistency in appearance should be strived for.	Remove or alter criteria	The two criteria, when applied together, should negate the commenter's concerns.
Criterion 6	Anderson Lloyd	It is unrealistic to assume that community housing will be indistinguishable from market driven residential housing. The fact is that a number of developments are high end developments targeted at a specific level of affordability. Strict design codes and guidelines are implemented to ensure that a uniform standard of quality is achieved across sites – this is of value to the community as it ensures	Remove or alter criterion	This criterion is considered important to remove any risk of social stigma attached to community housing and to ensure quality design of residential development. Assuming the application of Criterion 5 (the 'pepper potting' of community housing sites) it would seem to be in a developer's interest to ensure that community housing is of the same quality of external appearance to avoid the risk of lower quality design 'lowering the tone' of their development. It is notable that this criterion emphasises external appearance – similar building materials in facades

		outcomes that are consistent, and which meet the expectations of all parties. In this situation, developers have indicated they may be unable and unwilling to make any specific allowance or exception for community housing as this would dilute the flavour of the subdivision, and would be unfair on other purchasers. Thus the cost of building is likely to be too high for the Trust to be able to achieve whilst at the same time ensuring it is getting maximum value for its capital expenditure		should in most cases not be unduly expensive to achieve. Latest draft criteria are emphasising 'the urban design characteristics of the development', not that it be externally indistinguishable.
Criterion 7: (Lifetime Homes Standards)	Comments raised in the Urban Design Panel meeting re Doc B (included members of the development community)	Concern that we could be introducing a raft of regulations – 50% considered to be likely to be too high a target. Discussion about costs	Reconsider the appropriateness of the criterion	Although the Council feels that this is worthy of attention generally in the community, it is proposed that this be downgraded to a desired criteria and that in the first instance emphasis be put on the housing built by the Trust meeting these criteria. Rephrase the criteria removing the requirement.
Criterion 7: Housing suitable for the elderly etc	Tricia Austin	There was a guide published by BRANZ in 2001 "Homes without barriers- : a guide to accessible houses." Bullement, Alan. That might be helpful. Are all 16 design principles appropriate? It might be that at this stage, requiring them might all significantly add to the cost of construction. It might be better to concentrate on : for individual dwellings: design of entrance area and internal circulation on	Consider the appropriateness of the criteria given the potential for extra costs.	Although the Council feels that this is worthy of attention generally in the community, it is proposed that this be downgraded to a desired criteria and that in the first instance emphasis be put on the housing built by the Trust meeting these criteria. Rephrase the criteria removing the requirement.

		one floor, plus design of bathrooms for people with mobility problems / use of a wheelchair... plus design of entrance into the building plus communal areas for apartments...		
Criterion 8	Anderson Lloyd	It will, in reality, be extremely difficult if not impossible to actually measure and there appear to be no mechanism to enforce energy efficiency. One of the major influences on whether this criteria is met will be the cost of energy itself, not the design of the dwelling. Electricity, gas and oil prices fluctuate regularly – the problem for developers will be that they might meet this criteria one week but not the next	Remove the criteria	The intention was that the level to be met would be adjusted on an annual basis and that the construction would need to be proven to meet this standard at the time of design using the ALF programme mentioned in the document. However it is now conceded that this is unduly complicated and difficult to administer and it is suggested that: the criteria be adjusted to state required housing quality standards in terms of product specifications (e.g R values).
Criterion 8	Anderson Lloyd	The Criterion is too restrictive and too difficult to measure and administer	Remove the criteria	It is conceded that this is unduly complicated and difficult to administer and it is suggested that: the criteria be adjusted to state required housing quality standards in terms of product specifications (e.g. R Values).
Criterion 8	Anderson Lloyd	The Criterion is too difficult to meet.	Remove the criterion	It is conceded that this is unduly complicated and difficult to administer and it is suggested that: the criteria be adjusted to state required housing quality standards in terms of product specifications (e.g. R Values). Work has been done to demonstrate what the extra costs will be and this will be attached to the s32 report.
Criterion 8	Anderson Lloyd	The Criterion is probably unnecessary given the changes that the government is making to the Building Act requiring increased insulation and double glazing.	Remove the criterion	The proposed Building Act changes were considered. The Council believes higher standards are appropriate than what was suggested. It is noted that the final Building Code may provide for higher standards of insulation – the Council would consider withdrawing this part of the guidance and Plan Change if it were considered that these regulations

				were sufficient.
Criterion 8	John Darby	Agrees with the emphasis on quality long life cycle buildings and energy efficiency.	Note comment	Comment noted
Criterion 8 – A house should be designed, constructed and fitted so that providing appropriate heat, power and cooking fuel, including heating all habitable rooms of a house to 18 degrees Celsius, 16 hours a day, should cost no more than \$23.80 per square metre per annum	Anderson Lloyd	From the discussion documents circulated to date it is unclear whether the implications have been fully investigated and whether a rigorous cost benefit analysis has been carried out to ensure there is compelling evidence for this requirement	Remove the criteria	The Council believes higher standards are appropriate and will demonstrate this in an attachment to the s32 report.
Criterion 8 – energy efficiency requirements	Anderson Lloyd	In implementing measures to promote energy efficiency with an aim to lowering ongoing operating costs, the capital cost of a dwelling necessarily increases. Thus the entry level price increases making the initial purchase of a house unaffordable for those who do not meet the eligibility criteria and who will end up with no house.	Do not impose increased energy efficiency requirements on community housing	The increased energy efficiency requirements are only intended for community housing at this stage so will only be applicable to those that meet the eligibility criteria. The HOPE strategy identified this issue as appropriate to address given the desire to ensure a quality, sustainable housing stock and recognising the need to address ongoing housing costs via utilities. An attachment to the s32 report will demonstrate the time expected for occupants to 'recoup' the costs through lower utility bills.
Criterion 8	Comments	Higher densities are energy efficient	Note comment	Comment noted. Whilst this point is agreed, it is also

(energy efficiency standards)	raised in the Urban Design Panel meeting re Doc B (included members of the development community)	and can also have savings in terms of building materials		noted that a mix of housing types will be appropriate given the range of family types and sizes and that while higher densities will be utilised, some product will likely be appropriate as detached or semi-detached housing.
Criterion 8 (Sustainability Performance Standards)	Comments raised in the Urban Design Panel meeting re Doc B (included members of the development community)	Principle of aspiring for energy efficient housing supported however there remain concerns about the costs this could lead to. Noted that state houses remain popular in New Zealand as they were actually built to a better standard than much of the housing of the time.	Note comment	Comment noted
General comment	John Darby	The balance of the Guidance document is supported.	Note comment	Comment noted
Unacceptable property types	Comments raised in the Urban Design Panel meeting re Doc B (included members of the development community)	vi) 'commercial or industrial property' should read 'commercial or industrial unit'. This is so that ancillary residential units to a commercial property should not be excluded.	Make recommended change.	Delete
Unacceptable property types	Comments raised in the Urban Design Panel meeting re Doc B (included	Questioned whether 'ix) unit in a serviced or managed (excluding body corporate) complex' would be a conflict with multiple unit accommodation. Further clarification could be included to avoid this being unintentionally implied	Clarify intention and make change if appropriate.	Delete

	members of the development community)			
Urban Design guidance (page 10)	Comments raised in the Urban Design Panel meeting re Doc B (included members of the development community)	<p>Agreed that linking to four urban design guidelines is too many. MfE's guide considered too vague and high level with limited benefit. Better to cut. Recommended that we link to the two Housing New Zealand guides (or perhaps just one and not the higher density one) and the North Shore City design guide.</p> <p>Support for linking to guidance as encouraging higher density can have real negative environmental effects. Linking to wider guidelines in the meantime is worthwhile but we should look at producing guidance for higher densities / new subdivisions in the future at a QLD level.</p>	Reduce the number of guidelines being linked to.	This is agreed – make recommended changes . The Council intends to develop design guidelines for subdivisions also. Changes resulting from Plan Changes 6, 8 and 10 may relieve some of the design concerns related to higher density developments.

