

Private Plan Change 15 – Tuumata

Response 18383739

 [Back to Response listing](#)

Include unanswered questions

About you

Full name

(Required)

Aksel Danger Bech

Company name (if applicable)

Waikato Housing Initiative

Postal address

(Required)

360 Tristram Street, Hamilton Central

Postcode

3204

Email address

(Required)

aksel@waikatohousinginitiative.org

Do you want to be heard in support of your submission?

Please select one item

(Required)

Yes

No

Please select one item

Yes

No

Could you gain an advantage in trade competition through this submission?

Please select one item

Yes

No

Plan Change 15 - Tuumata Private Plan Change

The specific provisions of the Proposed Plan Change that my submission relates to are:

(Please reference the specific section or part of the planning provision(s), for example Rule 4.6.7, Rule 25.8.3.10)

1. Request for Private Plan Change PC15 :

1.0 Executive Summary

5.1.3 Residential Development

10.2.5 Housing Affordability

Appendix 3A :

3.7.1.6 Residential Zones

Appendix 12 : Urban Design Report

6.0 Urban Design Principles of the Structure Plan

6.8 Density

6.9 Housing Typology

My submission is that:

(State in summary the nature of your submission. Clearly indicate whether you support or oppose the specific provisions or wish to have amendments made, giving reasons.)

1. The Waikato Housing Initiative (WHI) is a group of passionate leaders who have a vision to change the current status quo of housing across the region. This initiative sets out to lead, connect and facilitate the delivery of affordable, quality and accessible homes in the Waikato and is a project of the Waikato Mayoral Forum and with membership of the Future Proof Chief Executive Advisory Group. The WHI operates through a collective impact model and is committed to upholding Te Tiriti o Waitangi principles. More detail can be found here: www.waikatohousinginitiative.org

2. The WHI neither opposes nor supports the overall Proposed Plan Change 15 by Tainui Group Holdings (TGH), given the range and complexity of matters to be considered exceeds the scope of WHI's mandate.
3. WHI is strongly supportive of the increased supply of affordable housing in the Waikato -and as evidenced in the 2018 housing stocktake, there was a shortage already then of some 4000 homes in the Hamilton City area alone. WHI therefore submits in support of the stated intentions of providing "for a range of housing types, from single level standalone dwellings through to low scale (three level) apartments" [1.0] provided these include affordable options. For clarity, WHI has adopted the UN Sustainable Development Goals definition of "affordable" as accommodation/housing costs not exceeding 30% of median household income (or alternatively a purchase price of not more than 3 times annual median household income).
4. WHI agrees that: "This will help to meet future household demand growth, including in the short and medium terms, at a location very well suited for residential development" [1.0]. Further WHI supports that "a variety of housing types including standalone houses, duplex dwellings, terrace houses, apartments and papakainga" and "set of bespoke planning provisions to ensure excellent urban design and environmental outcomes" [5.1.1] are useful aspirations in addressing housing needs locally.
5. WHI supports the acknowledgement that: "New method UFD-M63 Housing Affordability specifies that Future Proof partners should consider regulatory and non-regulatory methods to improve housing affordability such as increasing housing supply, greater housing choice, more diverse dwelling typologies, alternative delivery partners, and investigating inclusionary zoning." [10.2.5].
6. WHI notes however that the Proposed Plan Change 15 only seeks to give effect to "increasing housing supply, greater housing choice, and more diverse dwelling typologies" [10.2.5]. Building consents have run at historic highs over the past number of years in HCC yet demonstrably, simply increasing housing supply at market rates has failed to reduce house prices nor indeed bring more affordable product to the region. Put another way, simply having more housing stock at market rate available has had no impact

on increasing the amount of affordable housing stock available.

7. WHI is respectfully submits that given the lack of specificity about the affordable housing provisions and how they will be implemented, it is not possible to have any degree of confidence that housing that is actually affordable will be delivered. Median household income in Hamilton city according to Infometrics

[https://ecoprofile.infometrics.co.nz/Hamilton%20City/StandardOfLiving/Household_Income] is \$114,439 per annum which means in order for a home to be affordable it needs to be able to be purchased at 3 x Median Household Income (\$343,317) -or if rented (with or without assistance) OR on a rent to own basis OR a shared equity model OR long term secure tenure model with a mix of leasehold and free market model that in the region of not more than 30% of that household income should be spent on housing.

8. WHI submits that merely increasing the number of market priced homes available as is described in 10.2.5 may simply increase the number of unaffordable homes available in Hamilton -so encourage incorporation of provisions that make clear how TGH intends to achieve the objective stated in 1.0 and 5.1.1

9. The current Plan Change 12 hearing process will not consider inclusionary zoning as it has been deemed out of scope, but WHI notes that the recent Te Awa Lakes Medium Density Residential Zone [PC7 Decisions Version 4.2.13c and 4.8.8] and the Rotokauri North Medium Density Zone provisions [PC12 3.6A and 3.6A.2.4], as well as HCC's recent discussion of the Housing review report along with tabling of the Advancing Affordable Housing Outcomes in Hamilton dated February 2023 [HCC Strategic Growth and District Plan Committee meeting 20 April 2023] that notes: "the review asked how Council might better enable and facilitate the delivery of more affordable housing" [Item 11, point 30 on p127] followed by a list that includes inclusionary zoning as a regulatory lever [34.i.a.]. Whilst the PC12 hearing process has not yet concluded, WHI submits that the direction of travel in regards affordable housing is clear and evidenced in the inclusion of specified provisions and definitions for Te Awa Lakes and Rotokauri North.

10. WHI therefore submits that definitions and provisions specifying affordable housing to be delivered as part of the acceptance of the Proposed

Plan Change 15 in the manner of the Te Awa Lakes Medium Density Residential Zone chapters would serve to give effect to the Plan's stated objectives under 1.0 and 5.1.1 in a manner more likely to succeed than the wording currently proposed in 10.2.5. And if so, WHI would be in support of that as making a meaningful difference and achieving TGH's stated aspirations in this Proposed Plan Change.

I seek the following decision from the Hamilton City Council:

(Please give precise details.)

That specificity be incorporated regarding affordable housing provisions and how these are to be implemented, based on examples of recent Te Awa Lakes and Rotokauri North Medium Density provisions -or the general inclusionary zoning examples based on Queenstown Lakes District Council provisions.