

09 May 2021

Submission by the Marlborough Sustainable Housing Trust on the Long Term Plan Consultation Document 2021 – 2031

Contact Details

Marlborough Sustainable Housing Trust (MSHT)

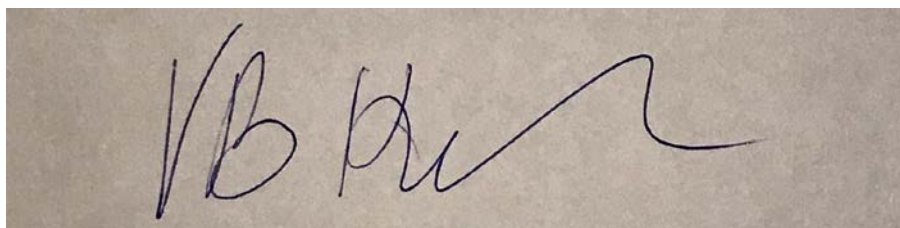
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YES we wish to speak to our submission at a hearing

A handwritten signature in dark ink on a light brown background. The signature is stylized, starting with a large 'V' and 'B' followed by a cursive 'H' and a long, sweeping horizontal line.

Date: 09 May 2021

Signature of *submitter* (or person authorised to sign on behalf of submitter)

About the Trust

The Marlborough Sustainable Housing Trust (MSHT) is a not-for-profit charitable trust and a registered Community Housing Provider (CHP). The Trust's purpose is to undertake actions, initiatives and programmes to promote and provide affordable housing to benefit people in charitable need with significant housing needs in Marlborough, particularly those in housing need associated with age, health problems or disability.

The Trust is in the process of developing three 4-bedroom affordable rental homes for low-income families in significant housing need. Previously the Trust intended to develop affordable shared rental accommodation for 14-15 older people on the same site, however this innovative project was unable to be progressed due to the Council's district plan restrictions and planning practices.

Below is our submission on the Housing portion of the Long Term Plan Consultation Document 2021 – 2031

1. Do you support Council expanding its core role in housing matters?

The MSHT supports the Council expanding its core role in housing matters.

As the proposal notes, builders or developers have not provided many lower cost houses, such as smaller one- or two-bedroom units or apartments or many small sections. This is a classic example of the market being unable or unwilling to provide more affordable housing and justifies central and local government intervention in the housing market.

The Council's expanded scope should be purposeful and focused primarily on the types of homes needed for our community that developers are not providing. For example the development at Boulevard Park on Taylor did little to provide lower cost housing, or the smaller one- or two-bedroom units in demand in our community. In fact it maintained a strong focus on larger, more expensive housing through its use of covenants preventing lower-priced alternatives.

Mark Wheeler shared a set of proposals for expanding Council's role with the Marlborough Housing Group 13 April 2021. These proposals form a basis for a more considered approach by Council and we have included and responded to the recommendations below.

1. That the provision of infrastructure and the regulatory requirements to enable appropriate housing on zoned land to continue to be given high priority.

MSHT supports this recommendation and encourages the Council to capture some of the windfall gains from land zoning and public infrastructure investment to benefit community affordable housing.

2. That discussions with land owners and developers continue to encourage and support residential subdivision and development.

MSHT supports this recommendation in principle but encourages the Council to incentivise landbanking developers to provide the lower cost housing the community requires. This should in part come from realising a community benefit from the public investment in infrastructure that creates windfall gains for private sector developers.

3. That impediments to sequential infrastructure development for residential zones be addressed and the use of designations under the Resource Management Act 1991 (RMA) and other powers under the Local Government Act 2002 and the Public Works Act are considered where negotiated settlements cannot be reached.

Again, the Trust supports this recommendation in principle while noting the caveats in our response to proposals 1 and 2 above. Any use of the Public Works Act should be done with great caution and as a last resort.

- 4. That Council considers the rationale for any Council intervention in housing matters being considered beyond its mandated role and what outcomes it is seeking to achieve.**

In our view the recommendation strengthens the argument for a housing strategy to inform a considered, purposeful and future focused approach to Council intervention in housing matters.

- 5. That the feasibility of Council purchasing zoned but undeveloped residential land and subdividing it be explored and a report to Council outlining feasibility and funding options be prepared.**

Council intervention should be based on a forward looking strategy to meet community needs for affordable housing. The Council's track record as a developer has not provided many lower cost houses, such as smaller one- or two-bedroom units or apartments or many small sections. The Council's use of covenants at Boulevard Park on Taylor prevented the lower-priced housing in demand in our community. Rather than acting as a developer, Council should consider how it can strategically partner with other organisations better able to provide affordable housing. One way that Council may support that is through providing land for lease on which other parties such as CHPs or iwi could build affordable and social housing.

- 6. That Council-led development of "affordable" housing or apartments on Council-owned land be investigated and a feasibility and funding options report be prepared.**

The MSHT supports this recommendation. The Trust encourages the Council to capture some of the windfall gains from land zoning and public infrastructure investment to benefit community affordable housing. We encourage the Council to look at the approaches taken by other local authorities, for example Queenstown Lakes where they have delivered over 100 affordable dwellings and achieved a 3-to-1 return on investment of affordable housing.

- 7. That Council continues to monitor and report on housing data and information according to the National Policy Statement on Urban Development (NPS-UD) methodology utilising updated Statistics NZ information when it is available and that this work informs planning for new residential zoning capacity requirements.**

The Trust supports this recommendation.

- 8. That a housing preferences survey of our community be commissioned looking at style, location and cost aspirations and the survey outcomes be discussed with the Marlborough and Central Government housing stakeholders to inform action plans.**

It is unclear what the purpose and benefits of conducting this work would be. Information about housing preferences and aspirations (which are different concepts) cannot provide information about housing need nor unmet demand.

- 9. That Council work with the Ministry of Education and KiwiRail to assist the**

understanding and possible solutions to housing supply challenges related to the Combined Colleges and iReX projects.

The priority should be forward focused solutions that leave a legacy of affordable housing for Marlborough. Temporary workers villages provide a short-term 'band-aid' solution and would represent a missed opportunity to provide sustainable, affordable housing in Marlborough.

10. That the current rating policy for rezoned but undeveloped rural land be reviewed for consultation in the 2022/23 Annual Plan with progress in the development of that land being a key consideration.

The Trust supports this recommendation but we would also like to see more focus on making better use of the existing urban area and infrastructure through Council support for intensification and brownfields development. Any proposal for greenfields developments must consider environmental effects and the incroachment of residential developments on valuable productive soils.

11. That further strategic planning work be undertaken through the Senior Housing Sub Committee on the Senior Housing Unit Renewal Plans.

Please see our comments below on Senior Housing Development on George Street.

12. That a budget of up to \$100,000 from the Forestry and Land Development Reserve be provided to assist with any planning and analysis work required to implement these recommendations.

Please see our next comment on Council-funded work on the housing issue.