

SUBMISSION ON THE DRAFT REPORT ON HOUSING AFFORDABILITY

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Q 7.1 *How can territorial authorities streamline and speed up planning and consenting processes to improve housing.*

- Whilst not a TA's issue, but a major overall of the RMA is required and not just a tinkering with.
- All the same TA's need to relook at their District Plans as more and more of them are overlaying numerous rules, policies and regulations that make it a minefield for a developer. In some cases the policy makers have not even consulted with those that need to police these policies and even they find them unworkable.
- For major subdivision developments or building developments, a "Project Manager" is appointed within the TA to co-ordinate all the various divisions within Council and thereby expedite the Consent.
- An online job monitoring system so an applicant can check regularly the status of a particular Consent, thereby providing some accountability.
- Revision of the appropriate Acts to enable email as a means of communication as opposed to letters thereby speeding up the whole consenting process.
- Staff training so those that are processing Consents are thinking how the Consent can be appropriately processed or how to improve it so it can be approved and not as in some TA's, serve a notice for further information so the "clock stops ticking".
- Rate building companies so those that are "A" grade with the quality of information provided, have their Consents fast tracked.
- Relook at the information that is requested for a Land Use Consent versus a Subdivisional Consent as more and more information is requested under the Land Use Consent.

- Conditions of Consent are becoming longer, more onerous and a lot completely unnecessary. It's a over-the-top risk adverse attitude.

Q 8.1 *What would be the advantages of making decisions about development contributions contestable through changes to the Local Government Act that would enable a merits-based test.*

- Excellent idea as TA's are fully aware the cost for a developer to challenge DC's is extremely costly and the areas that can be attacked are very narrow.
- If TA's believe that their process in developing the DC cost is fair, transparent and equitable, then they should not have an issue in being accountable for the quantum and methodology in calculating the DC's.

Q 8.2 *What mechanisms could be used to discourage frivolous litigation.*

- For a starter, litigation is expensive so no-one is going to head down that path very quickly.
- Have a mechanism of going thru mediation/arbitration first.

Findings and Recommendations

F 6.2 Agree with comments as sometimes this is used as a political football.

F 6.3 Generally agree but as you quite rightly point out in the draft report, there are a large number of older rental properties and they are depreciating in value. Plus, having gone through the boom times, we are not seeing the capital gains like there was back in 2008.

F 6.4 To change the GST treatment of housing would open up a large area of issues.

I assume your reference to rates being an efficient form of tax on the basis that central Government gets the GST of the rates.

F 6.5 In the report you raised the issue that year after year TA's rate increases are greater than the CPI. This is something that needs addressing.

F 7.1 Agree, but also the TA's preference for increasing residential densities is driven around infrastructure recovery but goes no way to addressing what the market actually wants.

F 7.2 Another bullet point would be fair and reasonable building fees and development contributions.

F 8.1 Growth does bring a benefit to a TA and this should be a consideration as well when they establish the level of DC's.

If a developer can demonstrate that there is no cost to Council for infrastructure outside an urban limit, they should be allowed to develop the land.

Because some infrastructure is provided for a longer period than the TA's planning period intergenerational equity should be allowed to be applied in setting DC's for those infrastructure items.

- R 7.4 Don't believe TA's could develop strategies to promote competition between developers. The real competition is the cost of the land and the developer taking the risk that there is a market for the product they have developed.
- R 8.1 Unless the guidelines have some teeth, they are a waste of time. In updating the guidelines there needs to be extensive consultation with the development community and not as it has in the past been mainly driven by a large input from TA's.

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