



Quality Control

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Prepared by:	Ruth Allen, Senior Property Consultant
Reviewed by:	Mark Heavey, Manager Operations and Clients

Revision History

Revision	Revision Date	Details	Aut	horised
			Name / position	Signature
1.0	29 Jul 2019	Draft for consultation	Clinton Fisher Senior Property Consultant – Development Management	C. Ohn.
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2.0	17 Oct 2019	Final draft Report	Clinton Fisher Senior Property Consultant – Development Management	C.Ohn.
3.0	16 Mar 2020	Final Report	Clinton Fisher Senior Property Consultant – Development Management	C. Ohn.



Executive Summary

The Kāpiti Coast district is experiencing increasing demand for housing and pressure on its public housing services. Historically, the Kāpiti Coast has been an affordable housing market based on alternative rural/lifestyle housing choices in proximity to Wellington. However, recent investment in regional transport infrastructure has improved connectivity to surrounding areas and as a result the district is becoming a more desirable location to live. The increased connectivity coupled with population growth and strong national property market has led to an increasing demand for housing.

To manage this demand Kāpiti Coast District Council (Council) has committed to develop a housing programme. Development of the housing programme will establish the role that Council will play in increasing housing supply and in encouraging affordable housing choices. It will identify the tools and levers the Council can use to influence the housing market and prioritise areas for action.

The housing programme will build on from other Council housing initiatives which include the pensioner housing condition assessments and preparation of the Housing and Business Land Capacity Assessment.

Development of the housing programme is consistent with the vision and direction of the Kāpiti Coast District Council 2018-38 Long Term Plan to support the resilience and needs of the community.

Purpose of this assessment

The Property Group (TPG) has undertaken the following assessment to identify the key issues to be addressed and the tasks required to establish the housing programme. The assessment provides a benchmark of current housing supply in the District and identifies current and future potential gaps to be addressed. It aims to give Council a broad understanding of its role in supporting affordable and public housing and to understand housing needs across the whole district.

The assessment has been prepared through a desktop review and comprehensive consultation with stakeholders including Council staff, community (and transitional) housing providers, Maori landowners, Central Government agencies, non-government organisations, some private developers, consultants and community groups.

Recommendations and actions

The assessment has identified the following key issues the housing programme will need to address and recommended actions to be considered. The prioritisation of actions is phased over short (3-6 months), medium (6-12 months) and long terms (12-24 months), for further details refer to Part C and Appendix 1 of the report.



Issue to be addressed	Actions for establishing the housing programme	Prioritisation
Investigate ways to increase the supply of public housing	 Action 1: Undertake an audit of Council's existing residential land holdings to determine redevelopment potential and improvements needed. 	Short term
	 Action 2: Investigate the suitability of other Council owned land to support housing developments, giving greater weight to the use of Council land for housing. 	Short term
	 Action 3: Engage with local iwi to determine how Council can support and enhance the capacity of Maori housing providers through opportunities for development partnerships on Maori-owned and other land. 	Short term
	• Action 4: Identify partnership opportunities with the public housing sector.	Short term
	 Action 5: In collaboration with the Regional Growth Framework for the Wellington Region, investigate the level of affordable and public housing needs for the Kāpiti Coast District. 	Medium term
	 Action 6: Investigate potential for long term strategic acquisitions to expand the opportunity for Council to undertake or enable housing development projects. 	Medium-long term
2. Improve the quality of existing public housing	 Action 7: Establish a working group with the local housing sector, including CHPs to support this industry to provide quality housing. 	Short term
	 Action 8: Investigate the feasibility of redevelopment of the Council owned pensioner units to provide additional housing opportunities while maintaining and improving at least the existing number of units for older people in the Council property portfolio. 	Medium term
	 Action 9: Identify opportunities for Council, either through partnership with a CHP or iwi group, to create an example of quality, medium density, 	Medium-long term



Iss	ue to be addressed	Actions for establishing the housing programme	Prioritisation
		public and affordable homes well-connected to transport and other essential facilities and services.	
3.	Encourage take up of existing development capacity	 Action 10: Map Council's consenting and approval process for housing proposals to identify opportunities for Council to assist the efficient processing of these applications and applicants to more easily navigate the system. 	Short term
		 Action 11: Map Council's operations to identify opportunities to incentivise residential development of land in existing urban areas and greenfields. 	Medium term
		 Action 12: In collaboration with the Regional Growth Framework and Council's Development Strategy, identify and prioritise critical infrastructure required to unlock development potential and growth. 	Medium-long term
4.	Improve the availability of emergency and transitional housing	 Action 13: Similarly, to Action 7, establish a working group with providers to address key barriers to accepting Special Needs Grants 	Short term
	ti ansitional nousing	 Action 14: Identify suitable Council or other land through Council or its partnerships that maybe available for temporary relocatable housing. 	Short-medium term

Next Steps

The key next steps in the establishment of the housing programme include the following:

- 1. Preparation of a programme brief that defines Council's Housing Policy and identifies the workstreams required
- 2. Resourcing of a dedicated programme team and enabling a cross functional team within the Council
- 3. Establishing a budget and duration of programme
- 4. Preparation of an implementation strategy.



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1. Introduction

Purpose

The Property Group Limited (TPG) has been engaged by the Kāpiti Coast District Council (Council) to undertake an assessment of housing in the Kāpiti Coast District. The assessment provides an analysis of current housing supply, including both market housing and public housing services, and reviews the likely demand into the future. It seeks to understand the opportunities for Council to influence the housing market and to identify the challenges and barriers to be addressed into the future.

The purpose of this work is to establish the next steps for Council to undertake to progress the development of a housing programme. The assessment will assist Council to develop a broad understanding of its role in supporting market, affordable and public housing and to understand housing needs across the whole district. It will enable Council to identify and prioritise strategies to address the problems identified.

Context

In line with challenges faced by New Zealand as a whole, there has been considerable interest and concern about housing availability and affordability on the Kāpiti Coast. Central Government has acknowledged that the demand for housing across New Zealand is growing and has generated a shortage of affordable housing by driving up house prices and rents (Ministry for Social Development, 2019). Recent policy changes signify a drive to address affordable housing as a national issue. This includes the upcoming review of the Resource Management Act to remove barriers to housing development and formation of Kāinga Ora Homes and Communities as a central urban development authority.

Along with most urban areas in New Zealand, the Kāpiti Coast is experiencing increasing demand for housing and pressure on public housing services. Historically, the Kāpiti Coast has been an affordable housing market in the region providing alternative choices to Wellington. However, recent investment in infrastructure including the Kāpiti Expressway and Transmission Gully have improved connectivity to surrounding areas (refer Figure 1 below).

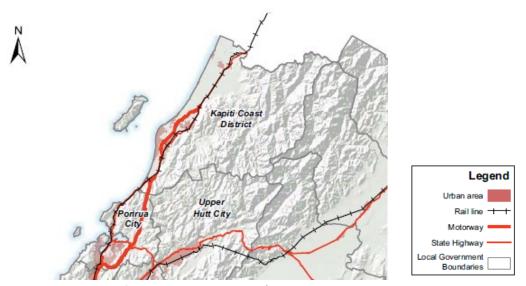


Figure 1 Connectivity of the Kāpiti Coast District (Wellington Regional Land Transport Plan, 2015)



The delicate balance of housing supply and demand is likely to come under increasing pressure as the links to the Coast and its desirability as a place to live and work improve. The affordability of housing is likely to further decrease as demand increases for housing without adequate new land supply, increased resourcing of the supply chain and strategic planning for growth. The impact will be greatest at the shallower end of the housing continuum, where there is already limited supply of public housing that will come under increasing pressure.

The Approach - Intervention Logic

TPG's approach to understanding the Kāpiti Coast district housing market is based upon an intervention logic technique (Treasury, New Zealand, 2019). This approach is used widely in New Zealand and Australia for strategic decision making.

Following the intervention logic technique, TPG's assessment has been undertaken in four key stages.

- <u>Stage 1 Problem definition</u>, complete a desktop review and targeted consultation to understand and highlight the relevant current and future market problems
- <u>Stage 2 Options analysis</u>, define each of the options for strategic intervention by Council to address the problems including identifying the associated opportunities and risks with each option
- <u>Stage 3 Definition of outcomes</u>, analysing the potential outcomes or benefits associated with the strategic interventions
- <u>Stage 4 Reporting</u>, provide a report based on the findings of the above in order to inform the next steps for Council including establishing a housing programme.

Report Structure

Following this introduction, this report provides an overview of the results of the assessment in the following sections.

<u>Part A – The Strategic Context</u>, puts the assessment into context by providing a review of relevant plans and polices and what they mean for the Kāpiti Coast Housing Programme.

<u>Part B – Housing Market</u>, analyses population growth and trends in the residential market to establish current and future demand on the sector and housing affordability.

<u>Part C – Housing Programme</u>, identifies the potential interventions Council could undertake to address the problems identified and makes recommendations for establishment of the housing programme.

Glossary

Due to the number of defined terms and abbreviations used in this document, a glossary is available at the rear of the report.

Appendix 1

A Prioritisation and Responsibility Schedule is presented to propose how and who would deliver the work.

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PART A THE STRATEGIC CONTEXT

2. National Plans and Policies

Introduction

The housing sector in New Zealand has been under increasing pressure to provide for a growing demand of housing. As a result, the Government has developed an array of polices, plans, programmes and funding mechanisms to address the need for housing delivery. The following section provides a summary of the relevant plans and polices and what this means for Council's housing programme.

Central Government has four key plans and policies to support urban development and affordable housing in New Zealand, including the Urban Growth Agenda, Kāinga Ora—Homes and Communities Bill, the national Policy Statement on Urban Development Capacity, and the Housing Infrastructure Fund.

The Urban Growth Agenda

The Urban Growth Agenda (UGA) is the Government's programme to manage and plan for significant urban growth in New Zealand over the next two years and beyond. It is an ambitious programme which aims to remove barriers to improve choices for the location and type of housing, access to employment, education and services, support emission reduction and climate resilience, and enable quality urban environments for cities to grow up and out.

The broader legislative changes to be undertaken will change the delivery mechanisms for housing development. This includes the review of the Resource Management Act and establishment of Kāinga Ora Homes and Communities to alleviate some of the hurdles in housing provision. Spatial planning for regional growth areas have been identified for Auckland – Hamilton growth corridor, Tauranga and Western Bay of Plenty, Canterbury, Queenstown and Central Otago and the Wellington Region. Council's housing programme will need to be in keeping with these changes.

National Policy Statement on Urban Development Capacity

The National Policy Statement on Urban Development Capacity 2016 (NPS-UDC) sets out the objectives and policies for providing development capacity under the Resource Management Act 1991. The NPS-UDC directs local authorities to provide enough development capacity in their resource management plans, supported by infrastructure, to meet demand for housing and business space.

In response to the NPS-UDC requirements, Council has prepared a draft Housing and Business Land Capacity Assessment (HBA) for the Kāpiti Coast. The HBA reports on the demand for, and supply of, residential and business development capacity over 30 years from 2017 to 2047. In summary the HBA has identified that based on current land zoning the Kāpiti Coast district has enough residential capacity over the short and medium term but has several potential longer-term shortages.

The residential capacity identified in the HBA has been used to inform TPG's assessment (refer to Section 9).



Public Housing Plan 2018-2022

The Public Housing Plan is the Government's response to the increasing demand for public housing across New Zealand through to 2022. It provides a plan about where, and how many, additional public housing places are planned to June 2022.

The Plan provides an overarching strategy for strategic partnering that:

- Provides an overarching strategic partnering model to guide how the Ministry of Housing and Urban Development (HUD) works with other agencies and providers, to meet the housing needs of New Zealanders
- Shifts away from a competitive and market-based approach to a more planned and collaborative approach
- Restricts capital funding that is now only available in limited circumstances
- Introduces higher operating subsidies (an operating supplement) available to only Housing New Zealand (HNZ) and Community Housing Providers (CHPs) up to a maximum of 90% of market rent to support development of new supply
- Maintains the existing Income Related Rental Subsidy (IRRS) contract for 25 years for HNZ and CHP tenancies.

Kāinga-Ora Homes and Communities Bill

The draft bill establishes Kāinga Ora - Homes and Communities as a Crown entity absorbing the functions of HLC, Housing New Zealand and some of the KiwiBuild functions and assets making it the Central Government's Urban Development Authority (UDA).

It will ultimately have the core functions of public housing landlord and leading and co-ordinating urban development. However, it is important to note the full urban development implementation powers of Kāinga Ora are unknown at this stage as they will be subject to a subsequent bill.

Te Puni Kōkiri - Funding for Māori Land Development

Te Puni Kōkiri was established under the Māori Development Act 1991 to promote increases in the levels of achievement attained by Māori in a number of key sectors including housing. In terms of housing, Te Puni Kōkiri's goals for the next four years are that:

- More whānau live in safe, secure and affordable homes
- Housing investment is a vehicle for whānau enterprise and community development
- Iwi and Māori are partnering and investing in housing innovation and development.

Te Puni Kōkiri supports the achievement of Māori housing goals in government programmes such as Housing and Urban Development and KiwiBuild. At a local level, it promotes housing investment as a driver and catalyst for the development of whānau and community enterprises.



3. Relevant Regional and District Council Plans

Wellington Regional Investment Plan

The Wellington Regional Investment Plan is a long-term plan that details the investments that need to be made over the next 30 years to ensure future success and improve the quality of life for the Wellington region. The Plan prioritises the development of new housing supply and urban form. It has the following focus areas and actions for the delivery of housing:

- Focus Area 1 An Urban Development Authority Model, supporting Kāinga Ora Homes and Communities to unlock urban development potential
- Focus Area 2 KiwiBuild Partnerships Identification of priority areas across the region that can support the KiwiBuild programme
- Focus Area 3 Public Housing Partnerships Identification of Crown or Council owned land which could be used for public housing developments
- Focus Area 4- Precincts Planning for urban growth at a precinct scale, ensuring that housing is provided in areas close to jobs and transport
- Focus Area 5 Greenfield development To accommodate the projected population increase
 greenfield developments will be required throughout the region. To be led by Council's in
 partnership with developers.

Work has commenced on a regional growth framework including the local and regional Councils, Central Government and Māori. Council's housing programme should accommodate strategies that are consistent with and aim to facilitate the actions outlined above.

Kāpiti Coast District Council Long Term Plan 2018-38

The Kāpiti Coast District Long Term Plan outlines the Council's investment path for the next 20 years. The long term plan acknowledges that both housing and rental affordability is increasingly becoming a significant issue for the District and identifies mechanisms for the funding of infrastructure to support an increasing number of dwellings.

Development of the housing programme and supporting the delivery of affordable housing aligns with the strategic directions in the long term plan for building a resilient community.

The Kāpiti Coast Communities Housing Taskforce made a submission to Council on the Long Term Plan in July 2017. The key recommendations made by the taskforce have been considered into TPG's assessment of key issues facing housing in the Kāpiti Coast and are addressed further in Part C of this report.

- That Council lease its public housing stock and land to the local Registered Community Housing Provider Dwell Housing Trust, and Iwi if they wish, by December 2018
- That Council immediately investigate why landowners do not want to rent out unused habitable units that they own, and use the results to free up these potential homes



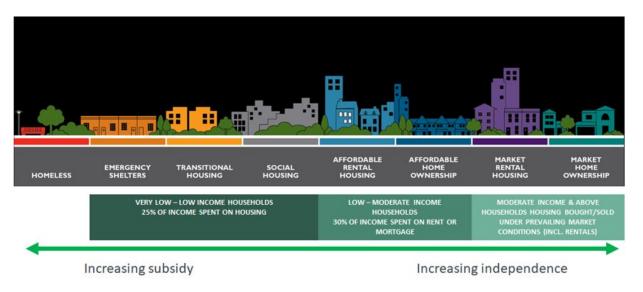
- That Council waive or reduce its fees and levies as appropriate when a residential development includes provision for affordable or public housing, particularly where it is to be utilised by a recognised Community Housing provider
- That Council immediately request Government to urgently fund and develop affordable and public housing on suitable NZTA owned Residential zoned land surplus from the construction of the Kāpiti Expressway, to remedy the earlier loss of housing.

4. Housing Typologies

The Housing Continuum

The Government housing sector uses the concept of a 'housing continuum' to identify the role public housing organisations have in providing homes to meet a range of housing needs in New Zealand. The housing continuum, shown in Figure 2 below, is a concept used by policy makers to consider the impact a policy has on different tenancies. It illustrates the various tenancies from homelessness and emergency shelters on the far left through assisted rental or assisted ownership, to private renting and ownership options in the market.

It is a useful tool in understanding the differing areas where Council can focus its strategies to improve housing availability and affordability.



Adapted from: Canada Mortgage & Housing Corporation and Community Housing Aotearoa

Figure 2 The Housing Continuum

Housing Typology Definitions

The housing continuum has a complex array of housing typologies. It is helpful to use these typologies when identifying the Districts housing needs and gaps in housing provision. Definitions of the housing typologies are given in Table 1 on page 13.



Table 1 Defining the Housing Typologies

Housing Type	Definition
Homelessness	 Having no other options to acquire safe and secure housing. There are four categories of homelessness: Without shelter – no shelter or makeshift shelter Temporary accommodation – overnight shelter in non-private dwellings not intended for long term living Sharing accommodation – temporary accommodation for people through sharing someone else's private dwelling Uninhabitable housing – people living in dilapidated dwellings.
Emergency Housing	If there is no supply of transitional housing or they have limited needs the individual will be given the Emergency Housing Special Needs Grant (EHSNG). This allows them to stay in a non-contracted provider for a seven-day period.
Transitional Housing	Contracted short-term housing provided by HUD for people who urgently need a place to stay. Transitional housing provides warm, dry and safe short-term accommodation as well as tailored services to support a transition to long-term housing options.
Public Housing (previously social housing)	Public housing is rental housing subsidised by Central or Local Government, CHPs or other community housing organisations (CHOs) e.g. trusts or iwi groups - for individuals and families whose housing needs or circumstances are not adequately provided for by the private sector.
Affordable Housing	Affordable housing is housing which is deemed affordable to those with a median household income or below.
Market Housing	Housing that is brought and sold under prevailing market conditions.

5. Stakeholders

Overview

To inform the assessment TPG has engaged with stakeholders in the Kāpiti housing sector. Stakeholder engagement was undertaken both in person and over the telephone.

The meetings were structured as follows:

- Confirmation of the District's housing continuum opportunities and constraints
- Proposed actions to enable the opportunities and mitigate the constraints.



Engagement was undertaken with approximately 85 individuals and organisations including the Mayor and elected officials and the Senior Leadership team of Council.

Other groups also included selected key Council staff, Māori landowners, Central Government agencies, CHPs, Transitional Housing Providers (THPs), non-government organisations and community groups (NGOs), a boarding house, selected motels and camping grounds, selected property developers and consultants.

The apportionment between Council and external stakeholders engaged was circa 40% to 60% respectively. Both qualitative and quantitative information was collected during these meetings.

The following section provides a review of the key issues raised and themes emerging through this consultation.

Results of Stakeholder Engagement

The key qualitative themes associated with the stakeholder engagement are summarised below in the opportunities and constraints analysis below:

Opportunities

- HNZ is planning to deliver 13 additional dwellings in the District over the next 3 years
- Strong regional CHP presence and appetite from some to deliver housing in the District
- Temporary housing projects to reduce the use of motels (under Special Needs Grants (SNGs))
- Early stage discussions between NGOs, CHPs and local developers
- Access to Council land or surplus land from infrastructure projects, subject to feasibility and disposal processes
- Planning for medium density (townhouses) near transport nodes serviced by good quality public transport
- Community appetite for alternative housing models
- Local manufactured prefabricated housing planned in Ōtaki
- Exploration of incentivising housing supply through enabling development policies
- District Plan review could facilitate long term housing supply
- Investigating ways Council could work more collaboratively with the development sector. For example, establishing single point of contact at Council.

Weaknesses

- Current Central Government policy settings are challenging for supporting new supply of community and affordable housing
- Due to restricted capital funding for CHP projects, some CHPs are winding their exposure down in the south of the North Island



- Development feasibility is challenging due to the poor ground conditions and increased construction costs to deliver housing
- The consenting process in Council is challenging due to increased time and costs
- Housing will come under increased pressure from the Transmission Gully Motorway (opens 2020)
 and increasing housing prices in the south
- Gentrification of urban areas generally impacts affordability for renters
- There is a lack of existing affordable housing supply in the District for the community, THPs and NGOs to secure housing for vulnerable members of the community
- The market demands larger sections for detached housing over other typologies
- A lack of medium density development and this is constrained by a lack of feasibility.



6. Existing Housing Supply Kāpiti Coast

Overview

Over time, the pattern of growth in the Kāpiti Coast has consolidated around the existing urban areas of Paraparaumu and Waikanae, leading to the incremental development of larger contiguous urban areas which then become better linked across the district. Almost 60% of Kāpiti Coast residents live in Paraparaumu Beach, Paraparaumu Central and Waikanae (Statistics New Zealand, 2016).

Alongside the development of these urban areas, the demand for rural lifestyle properties has also seen areas of surrounding rural land becoming subdivided into smaller lifestyle blocks. Overtime many of the farming and coastal areas in the southern portion of the district have been subdivided for residential development, and this pressure for subdivision is now extending to other parts of the district.

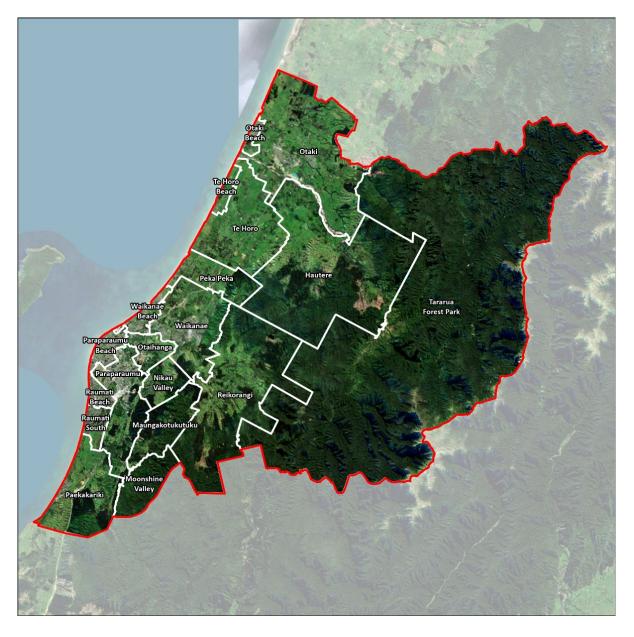


Figure 3: Kāpiti Coast residential areas



More recently, the MacKay's to Peka Peka Expressway has been completed, while the Peka Peka to Ōtaki Expressway is currently being constructed along with the Transmission Gully Motorway project. Both are expected to further increase accessibility to the district and contribute to further population growth.

Council owned land is illustrated below in Figure 4. This includes approximately 724 ha of Council owned land held in titles and 1,323 ha of land gazetted to Council (which may include infrastructure, for example roads).

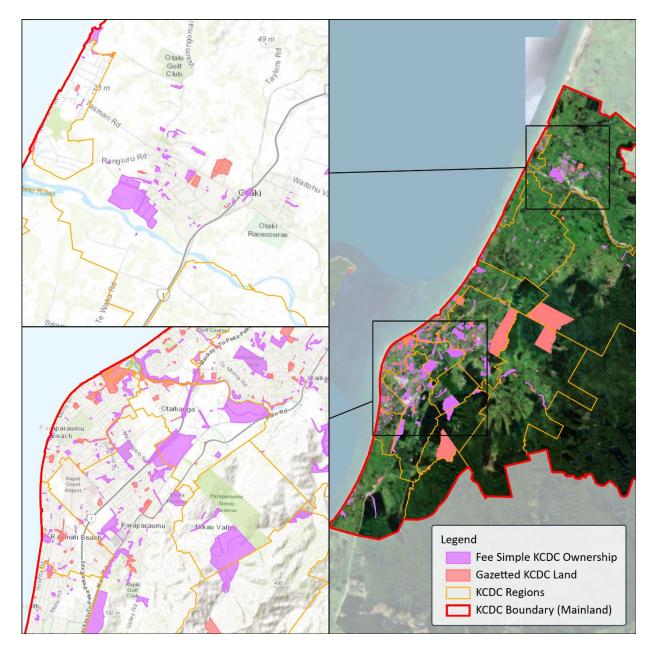


Figure 4: Council owned land

House Prices

The Kāpiti Coast historically has had affordable housing compared to other housing markets in the Wellington region. However, the recent benefits from significant investment in infrastructure projects of the Kāpiti Expressway development and Transmission Gully connections coupled with rising population and housing prices have increased the accessibility of the district and its desirability as a place to live and work improve.

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The median house price for the Kāpiti Coast District in June 2019 was \$600,000. While this is a slight drop down from \$602,000 in July 2018, overall there has been an increase in house prices over time. The median house price was \$549,000 in June 2018 which puts annual growth at 9.3%. Five years ago, the median was \$350,000 (interest.co.nz – Home Loan Affordability Report).

An overview of the median price points by suburb/township are shown in the table below. Each suburb shows the median price for All Dwellings over the previous three month and the percentage difference between the Sale Price and the Capital Value (CV). Areas with the highest increase in value over their CV appear to be properties which are located close to the beach as homeowners are seeking a particular lifestyle associated with living on the Kāpiti Coast.

Table 2: Median house price by suburb

Kāpiti Coast District			
Suburb	No. of Sales	Median Price (\$)	Difference between Sale Price & CV
Otaihanga	2	\$642,500	15%
Otaki	27	\$394,000	16%
Otaki Beach	16	\$412,000	21%
Paekakariki	4	\$587,100	6%
Paraparaumu	48	\$534,000	8%
Paraparaumu Beach	51	\$567,000	8%
Raumati Beach	33	\$514,000	11%
Raumati South	17	\$629,000	11%
Te Horo Beach	1	\$538,000	23%
Waikanae	50	\$574,000	11%
Waikanae Beach	25	\$587,000	12%
Waikawa Beach	1	\$535,000	69%

QV.co.nz (July 2019)

Housing Affordability

The affordability of housing in the District is likely to decrease as demand increases for housing without increased resourcing of the housing sector and strategic planning for growth. The impact will be greatest at the shallower end of the housing continuum, where there is already limited supply of public and affordable housing that will come under increasing pressure.

The housing affordability index is the ratio of the average current house value to average annual earnings. A higher ratio, therefore, suggests that average housing cost is a greater multiple of typical incomes, which indicates lower housing affordability (i.e. a lower index is more affordable).

The graph below demonstrates the affordability of housing in the Kāpiti Coast and for the Wellington Region by comparing average current house values with average annual

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earnings. It shows that the Kāpiti Coast is following Wellington trends with a decrease in housing affordability.

Due to the difference in income levels within the Kāpiti Coast and the Wellington Region, housing affordability for the district is lower overall. The mean income on the Kāpiti Coast is \$47,430 compared to \$67,580 in the Wellington region (Infometrics – Standard of Living). The difference in income levels could probably be due to the higher proportion of pensioners living in the district compared to the Wellington Region.

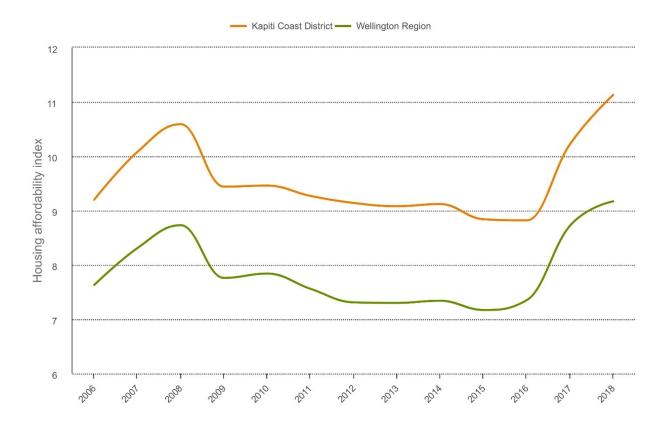


Figure 5: Housing Affordability Overtime

Rental affordability

The average rental rate for residential property on the Kāpiti Coast was \$369 per week in 2018 compared to the Wellington region of \$411 per week (Informetrics – Rent). However, due to the difference in income levels discussed above, the Kāpiti Coast rental affordability for the district is lower overall.

This is demonstrated through the rental affordability index which is the ratio of the average weekly rent to average weekly earnings. A higher ratio suggests that average rents cost a greater multiple of typical incomes, which indicates lower rental affordability.



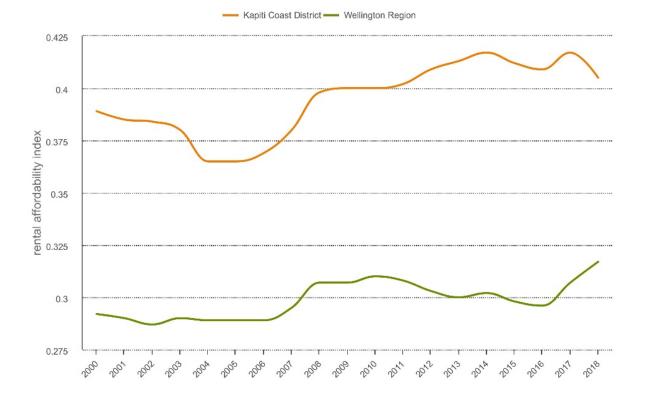


Figure 6: Rental Affordability Overtime

The graph above shows that rental affordability in the Kāpiti Coast is lower than the affordability for the Wellington region. This is mainly due to the much lower incomes for the region. However, the dip in rental affordability in the district shown between 2017-2018 could be explained by the following:

- Incomes could be growing from workers with 'Wellington wages' moving into the district and commuting south for employment
- Incomes growing as discussed above and rents remaining stable
- Incomes remaining stable and rents reducing which will make rentals more affordable.

Growth in the average rent for the Kāpiti Coast appears to be decreasing at an increasing rate from 2017. This is likely to assist with rental affordability in the district over the next few years while the Wellington region's rental rate continues to increase.

7. Provision of subsidised housing

Public Housing

Public housing in the Kāpiti Coast is currently provided by both government (Housing New Zealand Corporation, now form part of the newly established Kāinga Ora – Homes and Communities) and CHPs. For the purposes of this assessment, Council's provision of pensioner units is also considered under the public housing term noting that it has a different funding structure.



Currently there are an estimated 250 public housing dwellings and 118 pensioner dwellings within the district. Council also own seven residential properties that are earmarked for future infrastructure supply.

The following Table 3 summarises the current supply of public housing.

Table 3: Current Supply of Public Housing in the Kāpiti Coast District

Provider	Number of units
Kāpiti Coast District Council	118 pensioner units (refer blue dots in Figure 7)
HNZ	209 units (refer orange dots in Figure 7)
Salvation Army	40 x 1-bedroom community housing units
Dwell Housing	1 x 5-bedroom house
Paekākāriki Housing Trust	1 (unknown typology)

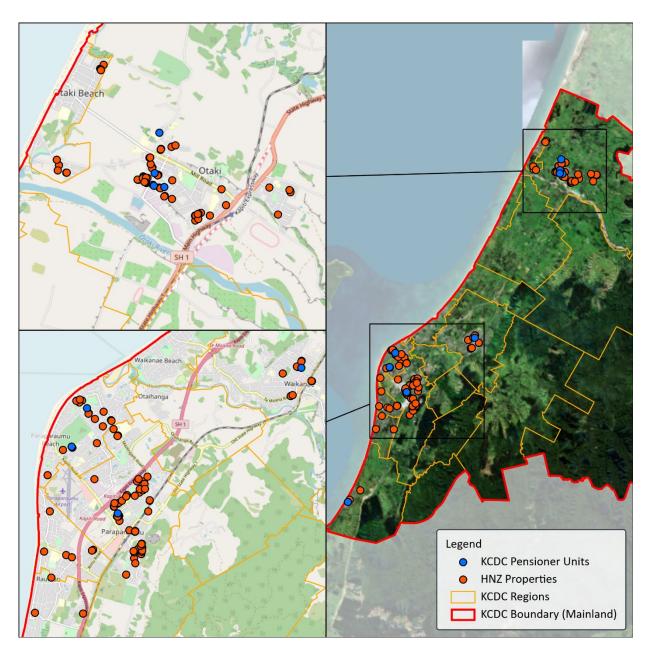


Figure 7 Locations of Public and Pensioner Housing



Central Government's funding settings currently exclude pensioner housing supplied by Local Government from the Income Related Rental Subsidy (IRRS). Council is therefore providing significant rental subsidies to enable this housing. This has meant there is limited funds available to upgrade the units which are aging. Alternatively, Council may wish to explore examples of other Councils who have structured their public housing portfolios to access IRRS, for example Nelson City Council and Christchurch City Council.

An audit of the quality of the pensioner housing units is currently being procured by Council, however the extent of the upgrades required is unknown.

Transitional Housing

Transitional housing is currently limited to only six contracted 'places' across the District. A 'place' is a dwelling that is occupied by a household for a twelve week cycle. Its intended that at the end of the cycle, the household moves into more permanent accommodation, for example public or affordable market housing. There are four cycles per year. Transitional housing is currently provided by The Salvation Army and is funded by HUD.

Other potential providers in the District include Woman's Refuge in partnership with MASH housing and Ngatiawa River Monastery. However, it is not clear whether these organisations are currently contracted to HUD to provide transitional housing.

Housing First

HUD's flagship housing programme Housing First (targeted at the chronic street homeless cohort) is not established or expected to be established in the Kāpiti District.

Emergency Housing

Potential emergency housing providers include boarding houses, campgrounds and motels. A desktop review has identified a potential sample of 159 beds in the District, including the Mary's Guest House facility.

Mary's Guest House provides about 90 single (bed) rooms that are suited to singles only and the operators allow SNGs. The other facilities contacted advised that they do not take SNGs due to poor experiences. There is a lack of suitable accommodation for households including children.

The number of motels preferred by MSD has reduced from three to two motels in the District. One of the preferred motels closed in August 2019.



8. Increasing Housing Demand

Population Growth

An assessment of Kāpiti Coast's current and future population and households is a critical input to understanding the future need for housing. Council's recent preparation of the draft HBA has undertaken a detailed assessment of population trends to determine the additional dwelling numbers needed into the future.

According to the HBA there is expected to be demand for 5,659 to 6,707 additional dwellings across the District. This is based on forecast.id projections that the District's current population is expected to continue to grow by 23%, from 50,700 in 2013, to 65,786 by 2047. Statistics New Zealand's High population projection sees this potentially increasing to as high as 69,340 by 2047.

Current national roading projects in the District are also expected to impact future growth, by increasing accessibility, thereby offering further attraction to residential and business development in the District. This growth presents both challenges and opportunities for the District.

Stand-alone housing is expected to continue to dominate future demand; 84% of overall new housing is expected to be standalone, while terraced housing and flats and apartments are expected to increase to up to 12% of all new housing.

Demand for Public Housing

In addition to facilitating the demand projections established in the HBA, the housing programme will need to address increasing demand for public housing. TPG's assessment has identified significant increases in demand for public housing in the District and no meaningful additional supply to address the gap.

In August 2018, the Ministry of Social Development (MSD) through the release of its Public Housing Plan confirmed demand for housing across New Zealand was growing and more people were experiencing severe and immediate needs for shelter. MSD acknowledged this demand was generated by a shortage of affordable housing driving up house prices and rents. People on low incomes are most affected by rising housing costs and many seek financial help through MSD and HUD.

The District has experienced significant increases in applicants on the MSD's Housing Register from 13 applicants in March 2016 to 95 applications in June 2019 that followed a peak of 110 applicants in March 2019. This increase is shown in Figure 8 on the following page.



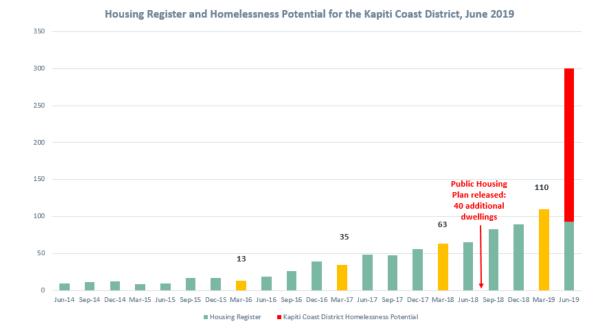


Figure 8: Housing register increasing in the District

Figure 8 also introduces a Homelessness Potential to address feedback from the housing sector engagement and an attempt to estimate the hidden demand occurring in the District. The Homelessness Potential is derived by estimating the number vulnerable members in the community that align with the definition of Homelessness in Table 1, contact a community housing provider (or similar) and who do not present to MSD for assistance due to personal circumstances, for example, dealing with mental health and/or drug and alcohol addictions.

The hidden demand in Kāpiti is estimated at 205 persons and a total demand for public housing in the District of about 300 persons compared to the Social Housing Register of 95 reported in June.

Demand for Emergency Housing

SNGs nationally for Emergency Housing increased to about \$34m for the June 2019 quarter or an increase of 230% on the June 2018 quarter payments

The number of SNGs including Emergency Housing Special Needs Grants (EHSNGs) have been marginally decreasing from 10,580 in the December 2018 quarter to 10,357 in the June 2019 quarter. However, in the twelve months to June 2019 an increase of 12.9% indicates that the trend is increasing numbers of vulnerable members if the community are seeking support from Central Government. The value of the SNGs in the Wellington region have increased about 103% over the same period, signalling a constrained level of housing supply, increase emergency housing costs and warranting additional housing supply for the Region and District.

9. Housing Supply

Overall the HBA for the Council has identified that based on current land zoning there is enough residential capacity over the short and medium term but has several potential longer-term shortages.



Residential capacity includes the development of both greenfield and brownfield/infill areas. The HBA for Kāpiti identified a plan enabled capacity of 23,135 dwellings. 19,785 of these were brownfield/infill and 3,350 were in greenfield areas.

Considering market factors including the price of land, land development costs and building costs, the number of feasible dwellings is 6,052. 3,310 of these were in brownfield/infill areas and 2,742 in greenfield areas.

Public Housing Pipeline

The future public housing pipeline planned under the Public Housing Plan (2018) for Kāpiti is only an additional 40 dwellings. At this stage Housing New Zealand plans only to deliver 13 dwellings over the next three years. The balance of the 27 dwellings under the plan are described to be delivered by HNZ or CHPs.

The increase in waiting list applicants from 13 applicants in March 2016 to 110 applicants in March 2019 demonstrates a potentially significant shortfall in additional public houses.

Registered CHPs have indicated their appetite to deliver additional supply in the District. However, a key barrier for CHPs to bring on more housing supply is the lack of up front capital funding from HUD to de-risk their development projects and enable favourable mortgages to be secured.

The pipeline for additional public housing dwellings is shown in the Table 4 below.

Table 4: Public housing supply on the Kāpiti District

Planned and current supply of	Current Pipeline by housing typology						
public housing in Kapiti District	supply	PHP	1 brm	2 brm	3 brm	4 brm+	Total
Public housing plan (PHP)		15	13	6	3	3	40
Housing New Zealand (Kāinga Ora)	209	0	0	11	0	2	13
The Salvation Army	40	0	0	0	0	0	0
Dwell Housing	1	0	0	0	0	0	0
Totals	250	0	0	11	0	2	13
Additional public housing required.		15	13	(5)	3	1	27



Affordable Housing Pipeline

Prior to the KiwiBuild unit being incorporated into Kāinga Ora in October, KiwiBuild explored surplus land from the Kāpiti Expressway projects located in Raumati South, however has found these opportunities are not feasible from a land development perspective due to challenging ground conditions. KiwiBuild have advised it's also is not feasible for them to deliver affordable housing for first home buyers north of Waikanae, as the price points delivered by the market are more favourable that what KiwiBuild could achieve.



PART C HOUSING PROGRAMME

The following section outlines the priority areas that require Council's consideration for the establishment of a programme of work. An Intervention Logic Map (ILM) was adopted to identify the benefits the programme of work is intended to achieve through the delivery of specific actions. The recommendations section then outlines a programme management framework to enable the delivery of the housing programme.

10. Key Issues to be addressed

The outcomes of TPG's assessment, as provided in earlier sections of this report, have identified the following key priority areas/issues to be addressed in the housing programme.

Priority Area 1: Investigate ways to increase the supply of public housing

This assessment has identified a significant increase in demand for public housing in the District and no meaningful additional supply to address the gap. The housing programme will need to identify ways in which the Council can support an increase in public housing supply on either Council owned land or in partnership with the housing sector.

Priority Area 2: Improve the quality of existing public housing

Due to funding constraints, Council's existing supply of pensioner units are likely to require renewal or redevelopment. Most of these units are aged housing stock and there is potentially significant funding required to bring them in line with existing quality standards.

Priority Area 3: Encourage take up of existing development capacity

The HBA has identified that, based on current land zoning, there is enough residential capacity over the short and medium term, but there are several potential longer-term shortages. Potential barriers to realisation of the existing development capacity include adequate provision of infrastructure to support residential development and the perceived process driven constraints such as council consenting processes.

Priority Area 4: Improve the availability of emergency and transitional housing

Currently there is limited provision of emergency and transitional housing within the District. Increasing housing demand and housing affordability issues documented in this report indicates there is potential for a significant increase in the demand for these services.

11. Strategic Responses

The following section provides an overview of the recommended strategic responses (or actions) that could be employed to address the priority areas identified above. A summary of the key responses is provided in the Investment Logic Map (ILM) below with the recommended actions given in more detail in the following section.



Kāpiti Coast District Council

Future of housing in the Kapiti District

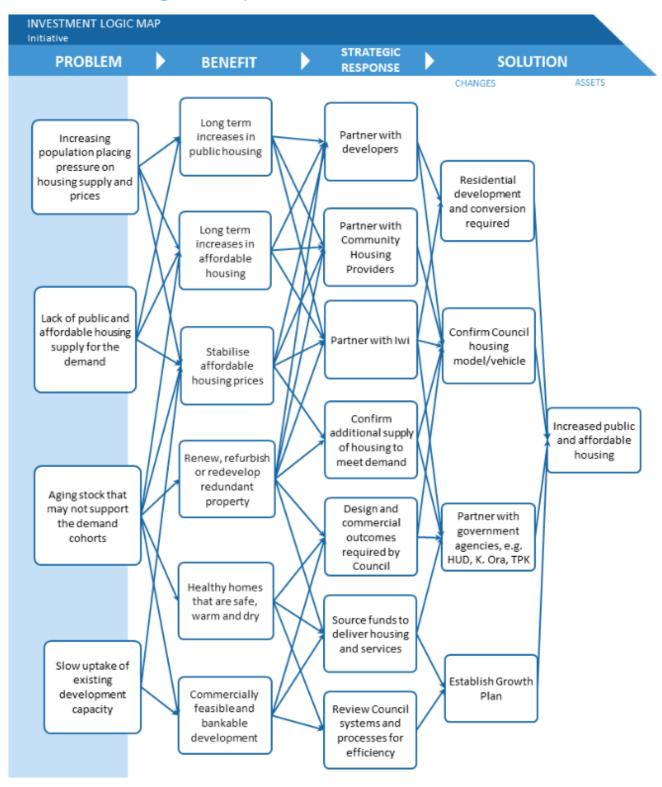


Figure 9: ILM for Housing in the Kāpiti Coast District



Increasing the Supply of Public Housing

- Action 1: Undertake an audit of Council's existing residential land holdings to determine redevelopment potential and improvements needed.
- **Action 2:** Investigate the suitability of other Council owned land to support housing developments, giving greater weight to the use of Council land for housing.
- Action 3: Engage with local iwi to determine how Council can support and enhance the capacity of Maori housing providers through opportunities for development partnerships on Maori-owned and other land.
- Action 4: Identify partnership opportunities with the public housing sector.
- **Action 5:** In collaboration with the Regional Growth Framework for the Wellington Region, investigate the level of affordable and public housing needs for the Kāpiti Coast District.
- **Action 6:** Investigate potential for long term strategic acquisitions to expand the opportunity for Council to undertake or enable housing development projects.

Improve the quality of existing Public Housing

- Action 7: Establish a working group with the local housing sector, including CHPs to support this industry to provide quality housing.
- Action 8: Investigate the feasibility of redevelopment of the Council owned pensioner units to
 provide additional housing opportunities while maintaining and improving at least the existing
 number of units for older people in the Council property portfolio.
- Action 9: Identify opportunities for Council, either through partnership with a CHP or iwi group, to
 create an example of quality, medium density, public and affordable homes well-connected to
 transport and other essential facilities and services.

Encourage Take Up of Existing Development Capacity

- Action 10: Map Council's consenting and approval process for housing proposals to identify
 opportunities for Council to assist the efficient processing of these applications and applicants to
 more easily navigate the system.
- Action 11: Map Council's operations to identify opportunities to incentivise residential development of land in existing urban areas and greenfields.
- Action 12: In collaboration with the Regional Growth Framework and Council's Development Strategy, identify and prioritise critical infrastructure required to unlock development potential and growth.

Improve Availability of Emergency and Transitional Housing

- Action 13: Similarly, to Action 7, establish a working group with providers to address key barriers to accepting SNGs
- **Action 14:** Identify suitable Council or other land through Council or its partnerships that maybe available for temporary relocatable housing.



12. Prioritisation of delivery

A proposed prioritisation and responsibility schedule informs what actions are required to be initiated and/or delivered in the housing programme establishment. The schedule and actions are phased over short (3-6 months), medium (6-12 months) and long terms (12-24 months). This is a useful tool for planning the implementation of the programme to align or understand clashes with other programmes, projects or workstreams that are undertaken by Council or its stakeholders.

The schedule also includes a proposed responsibility matrix that applies to each of the actions. The matrix is based upon a RASCI approach that supports the alignment (or conflicts) resource planning and delegations by aggregating roles and responsibilities, including:

- Responsible who is responsible for carrying out the entrusted action?
- Accountable (also Approver) who is responsible for the whole action and who is responsible for what has been done?
- Support who provides support during the implementation of the activity / process / service?
- Consulted who can provide valuable advice or consultation for the action?
- Informed who should be informed about the task progress or the decisions in the action?

For details please refer to Appendix 1.

13. Recommendations

The analysis and findings within this report supports:

- 1. The establishment of a programme for housing to ensure Council optimises its position to support the delivery of increased housing supply across the housing continuum in the District
- 2. Development of a housing programme will look at the role that Council can play in increasing housing supply and in encouraging affordable housing choices. It will identify the tools and levers the Council can use to influence the housing market and prioritise areas for action
- 3. The key objectives of the programme could be to:
 - Increase the supply of public housing and choice for existing and new members of our community
 - Improve the quality of our existing public housing to ensure its fit for purpose
 - Support the enablement and delivery of residential land supply
 - Advocate for increasing the supply of emergency and transitional housing for vulnerable members of the community.
- 4. Implement some of the key recommendations from the Housing Taskforce Report to Council that are within Council's sphere of influence
- 5. Delivery of the work in accordance with the Proposed Prioritisation and Responsibility Matrix that is summarised includes (for further details refer to Appendix 1):



Issi	ue to be addressed	Act	cions for establishing the housing programme	Prioritisation
1.	Investigate ways to increase the supply of public housing	•	Action 1: Undertake an audit of Council's existing residential land holdings to determine redevelopment potential and improvements needed.	Short term
		•	Action 2: Investigate the suitability of other Council owned land to support housing developments, giving greater weight to the use of Council land for housing.	Short term
		•	Action 3: Engage with local iwi to determine how Council can support and enhance the capacity of Maori housing providers through opportunities for development partnerships on Maori-owned and other land.	Short term
		•	Action 4: Identify partnership opportunities with the public housing sector.	Short term
		•	Action 5: In collaboration with the Regional Growth Framework for the Wellington Region, investigate the level of affordable and public housing needs for the Kāpiti Coast District.	Medium term
		•	Action 6: Investigate potential for long term strategic acquisitions to expand the opportunity for Council to undertake or enable housing development projects.	Medium-long term
2.	Improve the quality of existing public housing	•	Action 7: Establish a working group with the local housing sector, including CHPs to support this industry to provide quality housing.	Short term
		•	Action 8: Investigate the feasibility of redevelopment of the Council owned pensioner units to provide additional housing opportunities while maintaining and improving at least the existing number of units for older people in the Council property portfolio.	Medium term
		•	Action 9: Identify opportunities for Council, either through partnership with a CHP or iwi group, to create an example of quality, medium density,	Medium-long term



Iss	ue to be addressed	Actions for establishing the housing programme	Prioritisation
		public and affordable homes well-connected to transport and other essential facilities and services.	
3.	Encourage take up of existing development capacity	 Action 10: Map Council's consenting and approval process for housing proposals to identify opportunities for Council to assist the efficient processing of these applications and applicants to more easily navigate the system. 	Short term
		 Action 11: Map Council's operations to identify opportunities to incentivise residential development of land in existing urban areas and greenfields. 	Medium term
		 Action 12: In collaboration with the Regional Growth Framework and Council's Development Strategy, identify and prioritise critical infrastructure required to unlock development potential and growth. 	Medium-long term
4.	Improve the availability of emergency and transitional housing	 Action 13: Similarly, to Action 7, establish a working group with providers to address key barriers to accepting SNGs 	Short term
		 Action 14: Identify suitable Council or other land through Council or its partnerships that maybe available for temporary relocatable housing. 	Short-medium term

- 6. The next steps to establish a programme management framework for housing including the preparation of a Programme Brief, including:
 - The definition of Council's Housing Policy
 - Definition of workstreams
 - Resourcing a programme team
 - Stakeholder engagement strategy and communication strategy
 - Budget and duration of programme.



GLOSSARY

Term	Definition
Accommodation Supplement	MSD payment to low income individuals and families who have high housing costs. The payment currently subsidises the housing costs of around 11% of the total population.
Affordable housing	A resident household spends no more than 30% of its gross income on housing costs, whether rent or mortgage.
Alternative housing	Housing that is not public housing e.g. housing in the private market.
Base	Current number of public housing IRRS places e.g. 67,228 as at 30 June 2018. ?
Buy-in	Purchase of an existing or newly-developed property by a housing provider for the purposes of increasing the public housing supply.
СНР	Community Housing Provider – a housing provider (other than Housing New Zealand) that provides community rental housing and/or affordable rental housing.
Chronically homeless	Homeless for longer than 1 year, or
	 Experienced 4 or more episodes of homelessness within the last 3 years and the combined duration equals a year or more.
Community Housing Organisation (CHO)	A housing provider not registered with the CHRA.
	Example : Accessible Properties, which is New Zealand's largest nongovernment - community housing provider, owning and operating almost 2000 units - across New Zealand.
Community Housing Provider (CHP)	A housing provider (other than HNZ) that provides community rental housing and/or affordable renta housing. Registered by CHRA.
Community Housing Regulatory Authority (CHRA)	CHRA works with CHPs who wish to provide quality community and/or affordable rental housing for those in need. Our role includes registering CHPs as well as engaging with registered providers to monitor their performance and intervene if required. Read more about what we do.
	Assessing CHPs who meet the prescribed eligibility criteria.
	 Registering CHPs who meet the eligibility criteria and who demonstrate the capacity to meet the Performance Standards.
	 Maintaining an up to date register of registered CHPs which is accessible to CHPs, tenants and the public.
	Note : Regulatory framework for the community housing sector was introduced in April 2014. Needs assessments and associated functions were transferred from HNZ to MSD.
Emergency Housing SNG (EHSNG)	The purpose of the EHSNG is to help individuals and families with the cost of staying in short-term emergency accommodation (motels, hostels, campsites etc) if they are temporarily unable to access of MSD's contracted transitional housing places.
Homes. Land. Community (HLC)	Now part of the new government entity Kāinga Ora, Homes and Communities, HLC (formerly Hobsonville Land Company) was responsible for management of the development of integrated urbai communities. The company was established in 2006 to develop the former Hobsonville Air Force base into a new township.



Housing First	The Homeless Hub (Canada) defines Housing First' as a recovery-oriented approach to ending homelessness that centres on quickly moving people experiencing homelessness into independent and permanent housing and then providing additional supports and services as needed.			
Housing Support Products (HSPs)	A range of individual products designed to assist people to achieve or sustain accommodation in to private housing market by addressing barriers to access. Delivered by MSD to help people move for public into alternative housing; to meet needs not covered by other forms of assistance.			
Housing and Business Land Capacity Assessment (HBA)	The National Policy Statement on Urban Development Capacity (NPS-UDC) requires local authorities with a high- or medium growth-urban area in their jurisdiction to complete a housing and business development capacity assessment (HBA) at least once every three years. The HBA is to provide a clear picture of the current state of demand and capacity for housing and business land.			
Housing New Zealand (HNZ)	Now part of the new government entity Kāinga Ora - Homes and Communities, Housing New Zealand was responsible for the provision and upkeep of New Zealand's public housing.			
Income Related Rent (IRR)	IRR is calculated based on a client's assessable income and their household type. Public housing providers (HNZC and CHPs) then charge this rate as rent to the client (market rent = IRR + IRRS). If the calculated rate of IRR is higher than the market rent for the property, the housing provider will charge no more than the market rate as rent for the property.			
Income Related Rent Subsidy (IRRS)	A top-up payment to housing providers (HNZ and CHPS) to bridge the difference between client's income-related rent calculation and the market rent of the property. Market Rent = IRR + IRRS.			
Insecure housing	Living in dwellings or shelters not necessarily designed for human habitation but which are occupied.			
Kāinga Ora - Homes and Communities (Kāinga Ora)	Formed in 2019, Käinga Ora incorporates the functions of the former Kiwi Build Unit, Housing New Zealand and its development subsidiary HLC. It works with other government departments (MHUD and MSD) deliver public housing and undertakes government led urban development projects.			
Longer-term housing	Accommodation solution which is longer than three months and is sustainable for the client.			
Ministry of Housing and Urban Development (HUD)	The Ministry of Housing and Urban Development plays a lead role in helping individuals, family and whānau have healthy, secure and affordable homes that meet their needs.			
Ministry of Social Development (MSD)	Ministry of Social Development (MSD), manages all applications for public housing, assesses housing need, administers income-related rents for public housing tenants, delivers other social services, and provides accommodation support to people in need living in the private sector.			
Social Housing Register	The Social Housing Register represents the unmet need of people known to be eligible for public housing but cannot be placed. The Register includes applicants assessed as eligible for public housing who are ready to be matched to a suitable property. Applicants are assessed as <i>Priority A</i> or <i>Priority B</i> :			
	 A = People who are considered 'at risk' and includes households with a severe and persistent housing need that must be addressed immediately. The household is unable to access and/or sustain suitable, adequate and affordable alternative housing. 			
	 B = People who have a 'serious housing need' and includes households with a significant and persistent need. The household is unable to access and/or sustain suitable, adequate and affordable alternative housing. 			
	Some definitions include a requirement that <i>public housing</i> is owned by Central or Local Government, but this is not necessarily the case. Most often, public housing does receive direct subsidies from government to meet operating expenses or capital costs, or even both.			
Social Allocation System	Needs assessment tool used by MSD to assess housing need and eligibility for public housing.			
Social housing	Social housing is rental housing subsidised by Central or Local Government, Community Housing Providers (CHPs) or other community housing organisations (CHOs) e.g. trusts or iwi groups - for			



	individuals and families whose housing needs or circumstances are not adequately provided for by th private sector. Social housing is allocated based on need via the Social Housing Register (MSD). The provision of assistance with housing to those who cannot otherwise meet their own housing needs, prioritised mostly to those with the greatest unmet housing need.
Public housing	Public housing refers to social housing provided by any sector, including private – but subsidised in some way by the Government (HUD uses the term 'public' housing). They may be paying incomerelated rent or market rent.
	Note : MSD uses the term 'public' as excluding government-subsidised private rentals e.g. private tenants receiving the AS.
State housing	State housing refers to public housing owned and managed by HNZ. State housing is allocated based on need via the Social Housing Register (MSD).
	Most tenants in state/public housing pay Income-Related Rent (IRR).
	• Dispute over the use of the term 'social housing' in lieu of 'State housing' (or 'public housing') is in part, an ideological dispute around what those involved consider an appropriate role of the State in housing markets.
Special Needs Grant (SNG)	Is a grant to help individuals and families with the cost of staying in short-term accommodation (motels, hotels, campgrounds) if they are temporarily unable to access one of the Ministry's contracted transitional housing places.



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National Policy Statement on Urban Development Capacity

Public Housing Plan 2018, Ministry of Social Development

Social Housing Register, Ministry of Social Development

Urban Growth Agenda

Draft Wellington Region Housing and Business Land Capacity Assessment



APPENDIX 1

Proposed Prioritisation and Responsibility Schedule



Housing Programme Assessment - Proposed Prioritisation of Actions





Draft - 17 October 2019

ority Areas and Actions		Prioritisation		
	Short term 3-6mths	Medium term 6-12mths	Long term 12-24mths	
Priority Area 1: Increasing the Supply of Public Housing				
Action 1: Undertake an audit of Council's existing residential land holdings to determine redevelopment potential and improvements needed.	•			
Action 2: Investigate the suitability of other Council owned land to support housing developments, giving greater weight to the use of Council land for housing.	•			
Action 3: Engage with local iwi to determine how Council can support and enhance the capacity of Maori housing providers through opportunities for development partnerships on Maori-owned and other land.	•			
Action 4: Identify partnership opportunities with the public housing sector.	•			
Action 5: In collaboration with the Regional Growth Framework for the Wellington Region, investigate the level of affordable and public housing needs for the Kāpiti Coast District.		•		
Action 6: Investigate potential for long term strategic acquisitions to expand the opportunity for Council to undertake or enable housing development projects.		•	•	
Priority Area 2: Improve the quality of existing Public Housing				
Action 7: Establish a working group with the local housing sector, including CHPs to support this industry to provide quality housing.	•			
Action 8: Investigate the feasibility of redevelopment of the Council owned pensioner units to provide additional housing opportunities while maintaining and improving at least the existing number of units for older people in the Council property portfolio.		•		
Action 9: Identify opportunities for Council, either through partnership with a CHP or iwi group, to create an example of quality, medium density, public and affordable homes well-connected to transport and other essential facilities and services.		•	•	
Priority Area 3: Encourage Take Up of Existing Development Capacity				
Action 10: Map Council's consenting and approval process for housing proposals to identify opportunities for Council to assist the efficient processing of these applications and applicants to more easily navigate the system.	•			
Action 11: Map Council's operations to identify opportunities to incentivise residential development of land in existing urban areas and greenfields.		•		
Action 12: In collaboration with the Regional Growth Framework and Council's Development Strategy, identify and prioritise critical infrastructure required to unlock development potential and growth.		•	•	
Priority Area 4: Improve Availability of Emergency and Transitional Housing				
Action 13: Similarly, to Action 7, establish a working group with providers to address key barriers to accepting SNGs	•			
Action 14: Identify suitable Council or other land through Council or its partnerships that maybe available for temporary relocatable housing.	•	•		