

**BEFORE THE HEARINGS PANEL
IN QUEENSTOWN**

IN THE MATTER of the Resource
Management Act 1991

AND

IN THE MATTER of the Inclusionary Housing
Variation to the
Queenstown Lakes
Proposed District Plan

**REPLY OF AMY BOWBYES
ON BEHALF OF QUEENSTOWN LAKES DISTRICT COUNCIL**

INCLUSIONARY HOUSING VARIATION TO THE PROPOSED DISTRICT PLAN

28 March 2024

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1. PROFESSIONAL DETAILS

- 1.1** My name is Amy Bowbyes. I prepared a statement of evidence on the Inclusionary Housing Variation (**the Variation**) on behalf of Queenstown Lakes District Council (**QLDC**) dated 14 November 2023 (**Evidence**) and a statement of rebuttal dated 13 February 2024.
- 1.2** I have the qualifications and experience set out in paragraphs 1.1 – 1.2 of my Evidence.
- 1.3** I appeared at the hearing on 27 February 2024, and attended on 28 – 29 February, 1 March, and 4 – 5 March. I have been provided with reports of what took place at the hearing each day for the days I was not able to attend in person.
- 1.4** This reply evidence covers the following matters:
- (a) Relationship Framework Agreement (**RFA**) between QLDC and the Queenstown Lakes Community Housing Trust (**QLCHT**)
 - (b) Requirements for registered Community Housing Providers;
 - (c) QLDC's strategic approach to addressing housing issues.

2. RFA BETWEEN QLDC AND QLCHT

- 2.1** The RFA is appended to my Evidence. The Panel discussed by the RFA with Ms Baker-Galloway, who confirmed that the RFA contains a clause which requires that, in the event that QLCHT ceases to exist, all assets will be transferred to the ownership of QLDC. This requirement is stated at clause 3.7 of the RFA.
- 2.2** I agree with Ms Baker-Galloway on this point and furthermore wish to emphasise that this is an important aspect of the RFA, as it supports the retention mechanism which is a key component of the Chapter 40 provisions and provides an example of how the retention requirement works in practice.

2.3 I also note that the RFA contains a number of obligations such as those relating to the provision of “Affordable Housing Record” as defined, and limitations as to the use by QLCHT of Contributions provided by the Council.

3. REQUIREMENTS FOR REGISTERED COMMUNITY HOUSING PROVIDERS

3.1 The Chapter 40 provisions include a requirement that any Community Housing Provider (**CHP**) using the Affordable Housing Financial Contributions must be a registered CHP.

3.2 During the hearing, Mr Glaudel for Community Housing Aotearoa outlined the additional requirements on registered CHPs to demonstrate their compliance with legislation¹ which governs community housing. CHPs’ capacity and performance are assessed and monitored for:

- Governance
- Management
- Financial viability
- Tenancy management
- Property and asset management.

3.3 I agree with Mr Glaudel’s comments on the registration requirements and wish to emphasise that the requirement for registration is deliberately included in the Chapter 40 provisions as an efficient way of ensuring that contributions are dealt with by third party CHPs appropriately and for the purposes for which they are provided.

3.4 I also note that the RFA between QLDC and QLCHT includes a requirement that QLCHT must be a registered CHP and meet the performance standards and guidelines of the Community Housing Regulatory Authority (RFA clause 3.6).

¹ The Performance Standards are set out in the Schedule of the Public and Community Housing Management (Community Housing Provider) Regulations 2014, and are summarised here: [Annual-Monitoring-and-Reporting-Framework-2023-24.pdf \(hud.govt.nz\)](https://www.hud.govt.nz/annual-monitoring-and-reporting-framework-2023-24.pdf)

4. QLDC'S STRATEGIC APPROACH TO ADDRESSING HOUSING ISSUES - RATES

4.1 To address wider housing affordability the Homes Strategy and a predecessor, the Mayoral Housing Taskforce Report (2017), identify actions using the rating tool as one option among many available to Council. The Council therefore sees rating options and RMA options as complementary tools. The Council has previously had success with securing affordable housing contributions through planning processes (private plan changes and SHA consents), and it has decided to build on the previous approaches.

4.2 I remain of the view that witnesses for submitters have not fully considered the Council's strategic approach to addressing housing issues. The Panel has been provided evidence on the significant complementary work (both RMA and non-RMA) being undertaken by the Council to address housing affordability.



Amy Bowbyes

28 March 2024