

I am going through the evidence list for Plan Change 19, and I now see that Cromwell Yield Assessment September 2022 has been included as an Appendix of the section 42A report for the second hearing stream. This report was prepared in 2022 and was not referred to in the section 32 Report. Given that it was not referred to in the section 32A report it was not possible for me to comment on this report. I have now already had my hearing slot where I queried the reasoning for increasing the lot sizes across the district. This report (Cromwell Yield Assessment) appears to provide the justification for this increase in lot size i.e., there is sufficient plan enabled capacity (note there is not really any comment around what housing capacity is reasonably expected to be realised or comment around what is infrastructure ready).

For me the addition of this reports raises the following issues:

- The Plan-enabled capacity that has been calculated is coarsely measured, and infrastructure constraints are unclear in that they have not formed part of the model in the Yield Assessment;
- Feasible dwelling capacity is significantly overstated, and feasible uptake has not been demonstrated rather an arbitrary percentage has been used. Note that the percentage used here used current percentage developed rates in Cromwell township. Note this percentage would have come from when lots were able to be subdivided down to 250m<sup>2</sup> in order to put 4 dwellings on a 1,000m<sup>2</sup> lot – this was feasible. Under the current proposed plan this will halve to two dwellings arguably not feasible. Further the medium density zone is not in the older part of Cromwell so the feasibility of demolishing the existing homes cannot be taken as being the same as where homes are older and on larger blocks and;
- Future market supply is only ever a modest proportion of feasible capacity - this affects affordability.

When these issues are addressed to provide more reliable estimates of dwelling supply/demand, I consider that Cromwell to face significant shortfalls over the short, medium, and longer terms, especially in terms of affordable housing and housing choice within what is currently the Residential Resource Area (not large lots like in Pisa Moorings).

Accordingly, lot sizes should be further decreased as soon as possible to enable the efficient operation of the local land market. I also note that a lot of the capacity is now to be taken up outside of the Cromwell residential resource area this does not speak to affordability.

I would like to formally raise this matter with the Hearings Panel.