

## **Item 3.2**

### **COUNCIL**

8 APRIL 2015

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## **HOUSING ACCORD – NOMINATION OF SPECIAL HOUSING AREAS**

### **Purpose**

1. This report seeks the Council's agreement to recommend to the Minister of Building and Housing 16 Special Housing Areas (SHAs) in accordance with the Housing Accords and Special Housing Areas Act 2013 (HASHAA).
2. It follows a report to the Transport and Urban Development Committee (TUD) on 12 March 2015 where an amendment to the officer recommendation proposed during the debate, and a subsequent vote on that amendment, resulted in none of the sites proposed for recommendation to the Minister of Building and Housing being advanced.

### **Summary**

#### **Purpose of the Accord**

3. The Council entered into a Housing Accord with Government in June 2014. The Accord sets targets for the number of dwellings and sections to be consented across the city over the next five years. The Housing Accord is an important tool for the Council in achieving and facilitating increased housing supply across the city. It complements the Council's wider housing programme, and aligns with the Council's growth agenda as set out in the currently proposed Long Term Plan.
4. In agreeing the Accord with the Crown, the Council has agreed to the goal of increasing housing supply and improving housing affordability. The Accord notes that to meet demand from population growth, some 715 dwellings need to be built in the city each year. It further estimates that based on the number of dwellings consented over the last decade, there is presently a shortfall of some 3842 dwellings.
5. The Council can seek to achieve the aim of the Accord by providing an environment that facilitates development. The use of SHAs and the HASHA Act is a tool to achieve that aim. Further, the HASHA Act provides an alternative resource consenting process to that of the Resource Management Act 1991 (RMA), aimed at streamlining the consenting process. It does this by providing for expedited consenting timeframes, allowing only 'limited notification' of resource consent applications, and limiting appeal rights to the Environment Court to those parties identified as being affected and for developments of four storeys or more.
6. Since the Accord was agreed, Council officers have been meeting and working closely with officials from the Ministry of Business, Innovation and Employment, NZTA and staff from Greater Wellington Regional Council (Joint Officials Working Group) in implementing the Accord. The principal focus of this work has been to understand the development climate in Wellington city, developing processes to provide for a positive environment that facilitates development, and working to identify Special Housing Areas across the city.

#### **Establishment of Special Housing Areas**

7. Special Housing Areas are areas where the powers of the HASHA Act can be applied. SHAs can be identified by the Council and then be recommended to the Minister of Building and Housing for establishment by Order in Council.
8. The first tranche of SHAs included eight sites. The Council also agreed to a package of development incentives to encourage the uptake of development opportunities provided by the Housing Accord.
9. A second tranche of 16 sites is now proposed for nomination to the Minister of Building and Housing as SHAs. These sites provide for low to medium density development. They also provide an opportunity to further advance the rate of development in the city

and contribute to achieving the targets set out in the Housing Accord.

10. The proposed sites are:

- 135 Britomart Street, Berhampore – Housing New Zealand
- 175 Owen Street, Newtown – Housing New Zealand
- McLean Flats, 320A The Terrace – Housing New Zealand
- 74 Helston Road, Paparangi – privately owned
- 30 White Pine Avenue, Woodridge – privately owned
- Erskine College, Island Bay – privately owned
- 24A Freeling Street, Island Bay – privately owned
- Tapu Te Ranga Marae, Island Bay – privately owned
- The Reedy Land, 28 Westchester Drive, Glenside – privately owned
- Shelly Bay – Wellington City Council/Shelly Bay Ltd
- 131 Silverstream Road, Crofton Downs – privately owned
- Spenmoor Street, Newlands – privately owned
- 289-293 Mansfield Street and Princess Street, Newtown – Wellington City Council

11. Three additional sites are also proposed since the TUD Committee considered the above sites in March:

- 98 Westchester Drive, Churton Park – privately owned
- 34 Winsley Terrace, 150 and 184 Ohariu Valley Road and 224 Westchester Drive – privately owned
- 383-387 Adelaide Road, Newtown – privately owned

These sites are discussed in more detail below.

12. In recommending these sites to the Minister of Building and Housing, the Council is not agreeing to any particular development proposal. The decision to recommend these areas is a procedural one that makes available the alternative consenting path provided by the HASHA Act. A resource consent is still required and will be assessed in accordance with the legislation, including assessment against the relevant District Plan provisions.

13. The recommended sites are in the main already zoned for residential development, or are considered suitable for residential development. The sites present a range of development opportunities for greenfield development, infill development, or redevelopment in the case of the three properties owned by Housing New Zealand.

Maps of the proposed sites are attached to this report, along with maps showing District Plan zoning and associated overlays and notations.

14. Recommendation of these sites will contribute towards the achievement of the targets set out in the Accord. A number of these sites, and those already approved, will contribute housing and sections over the five years of the Accord's targets. That is, they will likely yield houses and sections over a number of years rather than contribute in only a single year. This is particularly so for the larger sites nominated. This goes to the purpose of the Accord – to provide for a level of development above what would be expected as 'business as usual'.

## **Recommendations**

That the Council:

1. Receive the information.
2. Recommend to the Minister of Building and Housing the approval of the following sixteen special housing areas and associated qualifying development criteria as identified in the Special Housing Area maps:
  - a. 135 Britomart Street, Berhampore, with qualifying developments being 10 or more dwellings or allotments;
  - b. 175 Owen Street, Newtown, with qualifying developments being 10 or more dwellings or allotments;
  - c. MacLean Flats, 320A The Terrace, with qualifying developments being 10 or more dwellings of allotments;

- d. 74 Helston Road, Paparangi, with qualifying developments being 10 or more dwellings or allotments;
  - e. 30 White Pine Avenue, Woodridge, with qualifying developments being 10 or more dwellings or allotments;
  - f. Erskine College, Island Bay, with qualifying developments being 10 or more dwellings or allotments;
  - g. 24A Freeling Street, Island Bay, with qualifying developments being 2 or more dwellings or allotments;
  - h. Tapu Te Ranga Marae, Island Bay, with qualifying developments being 10 or more dwellings or allotments;
  - i. The Reedy Land, 28 Westchester Drive, Glenside, with qualifying developments being 10 or more dwellings or allotments;
  - j. Shelly Bay, with qualifying developments being 10 or more dwellings or allotments;
  - k. 131 Silverstream Road, Crofton Downs, with qualifying developments being 10 or more dwellings or allotments;
  - l. Lot 41, Spenmoor Street, Newlands, with qualifying developments being 10 or more dwellings or allotments;
  - m. 289-293 Mansfield Street and Princess Street, Newtown, with qualifying developments being 10 or more dwellings or allotments.
  - n. 98 Westchester Drive, Churton Park, with qualifying developments being 10 or more dwellings or allotments;
  - o. 34 Winsley Terrace, 150-184 Ohariu Valley Road and 224 Westchester Drive, Churton Park, with qualifying developments being 10 or more dwellings or allotments.
  - p. 383-387 Adelaide Road, Newtown, with qualifying developments being 10 or more dwellings or allotments.
3. Delegate to the Mayor and the Chief Executive the authority to approve any minor editorial changes to the Special Housing Area maps.

## Background

15. The Council entered into a Housing Accord with Government in June 2014 in order to increase housing supply in the city, and by extension improve housing affordability. To achieve this aim, the Council must contribute to an appropriate development environment in the city.

16. The Accord outlines targets for the number of dwellings approved and sections consented across the city. The targets are as follows:

Targets – total number of sections and dwellings consented

Year One	Year Two	Year Three	Year Four	Year Five
1000	1500	1500	1500	1500

17. The Council then recommended a first tranche of eight SHAs in August 2014 for nomination to the Minister of Housing. These sites focused on the existing growth areas of the city, namely:

- the greenfield areas of Lower Stebbings and Lincolnshire-Woodridge;
- the Johnsonville and Kilbirnie medium density residential areas;
- Adelaide Road (Mount Cook Centre zone);
- Two 'low city' parts of the Central Area referred to as *Central Area North* and *Central Area South*<sup>1</sup>; and
- Arlington Apartments site (Inner Residential Area).

These areas were subsequently approved and are now in place.

18. As part of nominating the first tranche of sites, the Council agreed to a range of assessment criteria under which future sites would be assessed for nomination as SHAs. The sites proposed for nomination in this tranche have been assessed against those criteria.

19. The Council also approved a series of incentives to aid in the uptake of consenting

opportunities presented by the approved SHAs. These incentives spanned a range of measures from financial to process incentives, as follows:

- **Process incentives**

- A one-stop-shop consent function, which will use the streamlined consenting processes under HASHA Act; and
- Proactive engagement with the development community, infrastructure providers and key stakeholders.

<sup>1</sup> The two areas are those that qualify under the height limit of 27m prescribed in section 14(b)(ii) of the Housing Accords and Special Housing Areas Act 2013.

- **Financial incentives**

- An agreement in principle for a two year period of deferred rates increases on greenfield subdivisions in excess of 30 allotments or dwellings (from the time Council signs off the subdivision (s224(c)), or when the land is sold; and
- Waiving of pre-application resource consent fees.

- **Council targeted investment**

- Some of the SHAs are in areas where the draft WUGP has signalled growth will be encouraged through the provision of growth supporting infrastructure and public realm improvements.

20. Since August of last year, officers have focused on implementation of the Accord. Officers continue to work closely with official from the Ministry of Business, Innovation and Employment to this end. Work on implementation of the Accord has concentrated on engaging with key developers across the city. A number of sites were nominated by developers to officers from this engagement process, and these are reflected in this report. Additional work has centred on the investigation of the sites proposed for nomination, and establishing a monitoring framework for the Accord.

21. Officers have also agreed a Memorandum of Understanding with Greater Wellington Regional Council that clarifies the roles and responsibilities of both parties in implementing the HASHA Act. This focuses particularly on consent applications which cross the jurisdictional boundaries of both Councils. This is particularly relevant to the greenfield areas where resource consents from the Regional Council are often required for bulk earthworks and stream modifications.

## **Discussion**

### **Transport and Urban Development Committee**

22. The TUD Committee met on the 12<sup>th</sup> March 2015 to consider a second tranche of SHAs. 13 sites were recommended for approval to the Minister of Building and Housing. As noted above, ultimately the Committee did not recommend any of the sites proposed.

23. A number of issues were however discussed at the Committee and comment is made on these below.

#### **Consultation**

24. In recommending these sites as SHAs, consultation has been limited to the landowners of each site. With the exception of three sites (Shelly Bay, the Reedy land and Spenmoor Street), the remaining sites are zoned for residential development. These residentially zoned sites went through an extensive consultation process during the development of the current Wellington City District Plan. In some instances, the zonings of these sites and associated objectives, policies and rules were confirmed on appeal to the Environment Court. As discussed below, the existing provisions of the District Plan relating to these sites remain relevant considerations under the HASHA Act.

25. Accordingly, the District Plan zoning of these sites as residential anticipates residential development occurring on them, irrespective of whether the site is identified as an SHA. To that end, no further consultation was considered necessary in nominating these sites as SHAs. It is again important to remember that the identification of these

sites does not approve any form of development. Rather, it is a procedural step that allows a resource consent for subsequent development to be advanced under the HASHA Act instead of the RMA.

26. Whilst not zoned residential, the land at Shelly Bay is zoned Business 1. This zoning anticipates mixed-use development, including residential development, occurring on the site.

27. The Reedy land is zoned Rural Area. The site is being nominated due to its close proximity to areas of existing urban development, and the availability of network infrastructure (roading and three waters). Adjacent landowners who may be considered affected by any subsequent development can still be notified of a future resource consent application.

28. Spenmoor Street is zoned Rural Area with a provision for rural residential development. The site is located in an area surrounded by residential and rural lifestyle development. Adjacent landowners who are considered affected by a subsequent resource consent application may be notified of that proposal. The site can be fully serviced to an urban standard.

### **Master Planning**

29. Discussion at the TUD committee considered the need for approving master plans for some of the sites before a site is approved as an SHA. The example was drawn comparing the master-planning work that Auckland Council is undertaking in implementing their Housing Accord.

30. Auckland Council only enters into a master-planning process after an SHA is confirmed and only when:

- there is a plan change process employed in parallel with a resource consent process;
- in the case of larger brownfield sites; or
- where there are issues of mixed ownership involved.

31. Pre-application processes would still be required under a HASHA Act approach but site design is appropriately done at this point. Requiring a master planning process as a precondition of approving an SHA would:

- be counter-productive to the aim of the Housing Accord process;
- require developers to invest in such a process with no certainty that a proposal would actually proceed to a development application;
- provide no certainty that an SHA would subsequently be approved; and
- provide a further hurdle to dissuade developer interest, opposing the purpose of the Housing Accord.

### **District Plan considerations**

32. Committee members were concerned that site specific District Plan provisions will be 'lost' through a HASHA Act process.

33. In considering a resource consent application, the HASHA Act specifies that matters relevant to a resource consent application assessed under the RMA (Sections 104-104F) be considered and weighed against:

- the purpose of the HASHA Act, being the enhancement of housing affordability through an increase in land and housing supply;
- Part 2 of the Resource Management Act 1991 (being the purpose and principles of that Act); and
- the urban design qualities of the New Zealand Urban Design Protocol.

34. Accordingly any District Plan provision, appendix, notation, overlay, design guide or other relevant provision remains a valid and mandatory consideration of a future resource consent application lodged under the HASHA Act. These provisions have been included in the District Plan to address specific issues, and will remain important matters for consideration when assessing development proposals.

35. Lastly, any application made under the HASHA Act is assessed as a fully discretionary (unrestricted) activity. This enables the Council to reject resource consent applications which have unacceptable environmental effects.

### **Notification**

36. The Committee queried the different notification processes under the HASHA Act and the RMA. The HASHA Act only provides for limited notification of an application to adjacent landowners, infrastructure providers with assets on, under or over the land; and to requiring authorities if the land or adjacent land is subject to a designation.

37. Full public notification is not provided for under the HASHA Act.

#### **Additional Sites**

38. Following the TUD committee meeting in March, a number of additional sites were recommended to the Council. These sites are included in this report and are reflective of the growing interest and awareness of the Housing Accord.

39. These sites are:

- 98 Westchester Drive, Churton Park
- 34 Winsley Terrace, 150 and 184 Ohariu Valley Road, and 224 Westchester Drive, Churton Park
- 383-387 Adelaide Road, Newtown

40. Additionally, the proposed Princess Street SHA has been amended to include an adjoining site on Mansfield Street at the request of the owner of that site. This is discussed further below.

#### **Progress against the Accord targets**

41. Questions were also put by the TUD Committee concerning the achievement of the Accords targets. A monitoring report is currently being prepared and will be presented to the TUD Committee following a meeting of the Joint Steering Group for the Housing Accord, comprising of the Minister of Building and Housing, the Mayor and the Deputy Mayor. Officers anticipate this meeting occurring in April, with a report likely to the TUD Committee in May 2015.

#### **Proposed Special Housing Areas – Tranche Two**

42. 16 sites are proposed for nomination to the Minister of Building and Housing. The sites provide for a range of development densities, ranging from low density to medium density/infill development, and the redevelopment of three Housing New Zealand sites. Once these areas are recommended to the Minister of Building and Housing, they go through a Cabinet process for approval before being created by an Order in Council.

43. Approval of these sites would bring the total number of SHAs for Wellington to 24 (as compared to over 80 in Auckland) and provide a further impetus to the achievement of the targets set by the Accord. Officers estimate that the sites recommended as tranche two, along with those already approved as tranche one, could yield as many as 2500 sections and dwellings.

44. The Accord targets are ambitious and the selection of Special Housing Areas is a key tool to spur development. It is important to note that if despite the Council's best efforts the Accord targets are not met and no agreement is reached to renegotiate the targets, the Government may terminate the Accord. If the Accord is terminated, the Minister of Housing may identify Special Housing Areas at his discretion and the Chief Executive of the Ministry of Business, Innovation and Employment may be empowered to process resource consent applications under the HASHA Act. Officers maintain a good working relationship with the Ministry through the Joint Officials Working Group.

45. The sites proposed for nomination are therefore important in spurring additional development across the city in order to meet the targets set by the Accord.

46. The proposed sites are:

#### **Site Description**

135 Britomart Street, Berhampore Housing New Zealand site of 2000m<sup>2</sup>  
zoned Inner Residential containing a  
block of existing flats

175 Owen Street, Newtown Housing New Zealand site of 2500m<sup>2</sup>  
zoned Inner Residential containing a  
block of existing flats

MacLean Flats, 320A The Terrace Housing New Zealand site of 1500m<sup>2</sup>  
zoned Inner Residential containing a

block of existing flats

24A Freeling Street, Island Bay Approximately 2 hectare undeveloped  
site zoned Outer Residential

Tapu Ta Renag Marae, 44 Rhine Street,  
Island Bay

Approximately 4.6 hectare undeveloped  
site zoned Outer Residential

30 White Pine Avenue, Woodridge Approximately 3.8 hectare undeveloped  
site zoned Outer Residential, adjacent to  
the existing Lincolnshire-Woodridge SHA

74 Helston Road, Paparangi Approximately 1.2 hectare undeveloped  
site zoned Outer Residential

Erskine College, Island Bay Approximately 1.8 hectare site containing  
former school buildings and grounds  
zoned Outer Residential

The Reedy Land, 28 Westchester Drive,  
Glenside

Approximately 20 hectare site, containing  
one residential dwelling, primarily zoned  
Rural

Shelly Bay Approximately 2.8 hectare site containing  
former air force and naval buildings,  
zoned Business 1

131 Silverstream Road, Crofton Downs Approximately 25 hectare undeveloped  
site, primarily zoned Residential

Spennor Street (Lot 41) Approximately 10 hectare undeveloped  
site zoned Rural

Mansfield Street/Princess Street,  
Newtown

Approximately 5600m<sup>2</sup> partly developed  
site containing warehouse buildings  
zoned Inner Residential

98 Westchester Drive, Churton Park Approximately 3600m<sup>2</sup> site, zoned Outer  
Residential

34 Winsley Terrace, 150 and 184 Ohariu  
Valley Road, and 224 Westchester Drive,  
Churton Park

Approximately 18.5 hectare site  
containing two dwellings, primarily zoned  
Outer Residential

383-387 Adelaide Road, Newtown Approximately 3700m<sup>2</sup> site containing  
five dwellings and accessory buildings,  
zoned Inner Residential

### **Changes since TUD meeting**

47. Additional to the newly proposed sites mentioned above, the Princess Street proposed SHA has been amended to include an adjoining site on Mansfield Street at the request of the owner of that site. This addition would make the proposed SHA nearly three times larger than originally proposed. This provides additional options for comprehensive site design and development for this SHA.

### **Consistency with the Wellington Housing Accord**

48. All of the sites proposed for nomination are consistent with the Housing Accord's objective of increasing housing supply. The sites would provide for a range of development opportunities within the existing urban footprint, thereby also achieving Council's general policy aim of urban containment and boosting the level of development across the city, additional to baseline levels.

### **Consistency with the District Plan**

49. With the exception of the Reedy land and Spenmoor Street which are zoned rural, the remaining SHA sites are zoned for residential development<sup>2</sup> under existing District Plan settings.

50. Spenmoor Street is zoned for rural residential development (Rule 15.4.6 of the District Plan). This land (known as Point 360) is progressively being developed for residential and rural residential purposes, and is fully serviced to an urban standard (roading and services).

51. The Reedy Land is well serviced from an infrastructure perspective and would provide a further supply of greenfield land for residential purposes within an area surrounded by either existing residential land or future urban land. When considered in this context, the site can support residential development that would be generally consistent with the District Plan.

52. Part of the site at 224 Westchester Drive is zoned Rural Area and Open Space B. Whilst the entire site is proposed for inclusion, it is envisaged that any subsequent development will be limited to the residential portion of the site. A draft reserves agreement has been prepared with the landowner for the Open Space zoned area.

53. For those sites zoned residential, the consistency of these sites with the District Plan is demonstrated by their zoning. Additionally, these sites have gone through an extensive consultation process during the development of the District Plan.

<sup>2</sup> Shelly Bay carries a Business 1 zoning, the provisions of which provide for residential development.

#### Site Specific Controls

54. Some of the sites proposed for nomination are subject to particular District Plan provisions such as the ridgelines and hilltops policies overlay area, contains a feature such as heritage buildings at Erskine College, are subject to a design guide, or have particular provisions applicable to them contained in a District Plan appendix.

55. Recommendation of these sites as SHAs does not approve a particular development. If approved as an SHA, a resource consent may then be sought under the HASHA Act. Where a site is presently subject to a particular District Plan provision (e.g. a height limit), this provision will be taken into account, as it would normally be, in considering any future resource consent application for development.

#### Infrastructure availability

56. Comments were sought from Wellington Water on the availability of the three waters infrastructure for these sites.

57. Overall, no concerns have been raised that would preclude a site from being nominated as an SHA. Wellington Water has highlighted matters such as minor upgrades to pipe infrastructure or potential on-site stormwater detention requirements for some sites. These matters are appropriately addressed at the resource consent stage.

#### Shelly Bay

58. A development feasibility study shows that a sustainable development can proceed on the Shelly Bay site provided the infrastructure currently servicing the area is upgraded. No development would be approved without investment in these essential services.

59. Accordingly, all of the sites proposed are considered to be suitable from an infrastructure perspective.

#### Landowner and lwi views

60. Landowners are supportive of each site proposed for nomination to the Minister of Building and Housing, with a number of the sites proposed for recommendation as an SHA having been nominated to Council by the landowners themselves.

61. Shelly Bay is partly owned by Port Nicholson Block Settlement Trust through Shelly Bay Ltd. Shelly Bay Ltd is supportive of the sites nomination. Council is also an owner within the wider Shelly Bay site.

#### Demand for Housing

62. There is ongoing demand for housing in these areas as the city continues to experience a moderate rate of growth. The sites proposed will cater to a wide range of dwelling types and therefore a wide segment of the market. They will also provide for development of sites within established urban areas where strong demand for

residential housing exists.

### **Qualifying Development Criteria**

63. Qualifying development criteria relate to the number of dwellings/sections required within each Special Housing Area for a development to be able to progress under the HASHA Act. The recommended criteria for each Special Housing Area have been formulated based on consistency with the first tranche of Special Housing Areas and with reference to the particular characteristics of the site (10 or more for larger greenfield or redevelopment sites; 2 or more for infill/medium density sites).

64. This number does not equate to the total number of dwellings or sections that could be developed within these SHAs but is a minimum. Total numbers will depend on the type of development proposed and assessed as being acceptable by the Council.

### **Communication and Engagement**

65. Officers have consulted with the landowners of each of the sites proposed for nomination in preparing this report.

66. No consultation beyond that undertaken with landowners is proposed as part of recommending the present group of sites as SHAs to the Minister of Building and Housing. Officers have continued discussions with staff from the Greater Wellington Regional Council, Ministry of Business, Innovation and Employment, NZTA and Wellington Water in preparing this paper.

67. A Communications Plan for the Housing Accord was prepared in 2014 following the signing of the Accord with the Crown. In accordance with this plan, a press release will be issued following the nomination of the second tranche of Special Housing Areas to the Minister of Building and Housing.

### **Next Actions**

68. Following the nomination of this second tranche of sites to the Minister of Building and Housing, officers will investigate a potential third tranche of sites, continue liaison with the development community, and continue monitoring the implementation of the Housing Accord.

69. A meeting of the Joint Steering Group comprising the Minister of Building and Housing, the Mayor and the Deputy Mayor will soon be scheduled by officials from the Ministry of Business, Innovation and Employment as required by the Housing Accord.

### **Attachments**

Attachment 1. Proposed Special Housing Area Maps Page 51

Attachment 2. Proposed Special Housing Area Maps - Zoning and Notations Page 67

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## **SUPPORTING INFORMATION**

### **Consultation and Engagement**

Officers have consulted with the landowners of each site proposed for nomination, and engaged with officials from the Greater Wellington Regional Council, Ministry of Business, Innovation and Employment, NZTA and Wellington Water in preparing this paper.

### **Treaty of Waitangi considerations**

There are no known implications.

### **Financial implications**

There are no known implications stemming from this paper.

### **Policy and legislative implications**

Council has signed a Housing Accord with the Crown. The 16 Special Housing Areas recommended for approval will need to be approved by the Minister of Building and Housing and Cabinet, before they are gazetted and included as a schedule to the Housing Accord and Special Housing Areas Act as Special Housing Areas.

### **Risks / legal**

There are no known risks and legal implications from the recommendation of these sites as Special Housing Areas.

**Climate Change impact and considerations**

The proposed Special Housing Areas provide for a range of low-medium density development options in areas appropriately zoned for development purposes and within the overall urban footprint of the city, promoting a policy of general urban containment.

Promoting a compact urban form reduces the consumption of fossil fuels and harmful greenhouse gas emissions which result in negative climate change impacts.

**Communications Plan**

A Communications Plan has been prepared for the implementation of the Housing Accord. A press-release will follow the recommendation of these sites to the Minister of Housing as Special Housing Areas.