**Submission to QLDC on Lake Hawea Universal Developments (UD) Hawea Limited Expression of Interest (EOI) for a Special Housing Area (SHA) June 2018**

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**Our submission:**

This EOI is an application from a profit-driven developer, UD, who is attempting to “fob off” the public with a promise of social housing.

We oppose this application and ask the QLDC to turn-down this application for the following reasons:

1. It does not meet the criteria set down by the Council in that Lake Hawea is not mentioned in the council’s group of locations for possible SHAs.

2. The QLDC policy also states that it will not accept any proposals for new SHA areas.

3. SHAs are not designed for rural areas and UD’s land is zoned rural.

4. The EOI contains language that shows it does not understand the district in which it is attempting to develop land. Throughout the entire document and several of the appendices the words “Lake Hawea” meaning the township are not included, instead UD refers to “Hawea”. Locals know that the name Hawea applies to the whole district which is made up of several communities: Lake Hawea, the township is the largest, others are Hawea Flat, John Creek, Maungawera. We find this lack of basic knowledge an affront.

5. The EOI also contains other language that is plainly wrong: the words ‘complimentary, compliment and complimenting’ are used throughout when in fact the words ‘complementary etc are what we think UD is trying to say – the two words have completely different meanings.

6. The EOI totally misrepresents the HCA by saying that it supports the extension of the township boundary across Cemetery Road to the south.

We were part of the original 2020 discussions where the community was very clear that Lake Hawea boundaries were to be the lake, Muir Road to the east and Cemetery Road to the south.

The 2015 report of the Hawea Community Asociation (HCA) reviewing the 2020 reiterates this very clearly in several places eg,

“At Lake Hawea, the Township Zone should be extended through to Cemetery Road.

“…long term future growth is contained within the urban boundary of Cemetery Road.”

“Based on the predicted growth projections it is recommended that the urban boundary encompass the existing Township and Rural Residential Zone in Lake Hawea without encroaching into the Rural General Zone,… . Lake Hawea boundary will remain Cemetery Road on the south”.

The EOI misrepresents the 2015 HCA document when it says: “The 2015 Community Association review also sought to extend the boundary south as discussed above, again acknowledging and supporting growth south of the road.”

And again “In coming to a decision to provide an urban growth boundary for Hawea the PDP Hearing Panel only received one submission on this issue from the Hawea Community Association. In that submission the Hawea Community Association sought part of the boundary be drawn south of Cemetery Road.”

This latter statement is again misleading and untrue, because it implies that HCA sought to have part of the boundary drawn south of Cemetery Road. In fact this portion of land south of a small part of Cemetery Road is land that was zoned and consented by QLDC many years ago. The HCA which had consulted the community as part of the 2015 review, had no choice but to draw that portion of Lake Hawea’s southern boundary around land already consented for Rural Residential development. It does not mean that the Lake Hawea community along with the rest of the district, wants the QLDC to set the boundary of the township south of Cemetery Road – to the contrary.

7. We find the maps included in UD’S EOI and appendices ambiguous in relation to the exact location of the proposed site, particularly its western boundary. The Certificate of title shows Capell Avenue to the west of Lot 2. As this matches the size of the EOI land, it makes the alignment with Capell Avenue difficult to see.

8. We find the constant references to Capell Avenue disturbing. At present this section is a walkway and cycleway but the EOI treats it as a road in existence – apart from one reference -and a major part of their plan. As we understand it there are no plans in the immediate future to open up this section of Capell Avenue to vehicles and it might be the 2030s before this happens.

9. The EOI says “that Soil Testing and assessment has been provided by e3Scientific considering NES related matters. This work has confirmed the land is suitable for residential development.”

This statement ignores the potential for substantial localised contamination of multiple toxins to have been overlooked at the site of a reasonably large agricultural dump in the north-east corner of the UD site between sample sites HF8 & HF9 and the Cemetery Road fence. This site was used as a dump for many decades and is likely to be contaminated. There may be other undisclosed farm dump sites elsewhere in the UD property. We believe that this issue would need to be better addressed than it is in the EOI

10. The Ecological Review looks like an afterthought and a very inadequate one at that. It does not talk about any possible fauna such as lizards which are common in the Hawea district. Nor does it discuss the presence of any insects, also likely to be present. To describe the site as “not visually sensitive or ecologically sensitive” shows a complete lack of evidence-based reviewing, something that decision-makers look for when studying applications.

11. Is the site productive as rural land? The EOI says it’s not but the rural land immediately to the east is certainly productive. Again it seems that no evidence has been provided to support the claims it’s unproductive. It potentially could be, but the previous owner(s) have obviously chosen not to farm it.

12. Is there a shortage of available land for affordable housing as suggested in the EOI? At present the flat to the north of Cemetery Road contains a considerable amount of land that is yet to be fully developed. Sentinel Park has around 90 sections and Willowridge space for around 150. More land exists to the east towards Muir Road and there are other parts that have unbuilt space.

As to cost it is misleading to say that none of this land will provide affordable housing. Prices thrown around are confused as the result of one lakefront property having been sold for 1.7 million dollars. Again a lack of evidence, especially re house prices provides misleading information.

13. Is there a need for another community hub? Lake Hawea already has a community hub with its community centre, sports ground, playground, bowling green, library and café, and accommodation. Do these need shifting or duplicating, we don’t think so, especially as the long-term future for such facilities was addressed in 2015 document.

12. Some comments about rural landscapes. In our submission to the QLDC District Plan review we stated that we did not want to see the currently rural lands between Cemetery Road and Camphill Road becoming scattered or covered with dwellings. This EOI if accepted would be contrary to our wishes and set a precedent for more applications to cover our rural landscape. We do not wish to see the Hawea district occupied as the Queenstown basin has become and as the Wanaka outskirts are fast becoming.

Rural spaces, rural landscapes and food producing spaces are too precious to do away with willy nilly, especially as the normal requirements of the Resource Management Act and the QLDC District Plan are over-ridden in the SHA legislation, and it does not meet the requirements of the council’s own SHA policy.

This EOI to us is a misuse of the Social Housing Accord legislation and should be declined.