Dear Councillors

I, Rachel Brown of Hawea Flat, have been involved with many many conversations about the proposed SHA for Hawea. You as councillors are being asked to consider the EOI from Universal Developments later this month.

After much consideration I ask you all to ensure that you particularly consider the following:

The purpose of the Housing Accords and Special Housing Areas Act 2013 (HASHAA) is to ***enhance housing affordability*** by facilitating an increase in land and housing supply in ***certain*** regions or districts.

Under HASHAA the Council may at any time recommend to the Minister that one or more areas within the district be established as special housing areas.

QLDC works with a **Lead Policy** to guide this process. This Lead Policy is commendable as an effective way for councillors to manage decision making. I applaud the allowance for community feedback, and also the policy that *council* categorises land suitable for SHA, rather than *developers* doing so.

“The Council will consider proposed special housing areas in light of its overall strategic direction for development in the District. *T****his includes establishing special housing areas within existing urban areas, or proposed urban areas in the Proposed District Plan, including those that are anticipated to fall within urban growth boundaries.*”**

The new map for Lake Hawea Township in the Proposed District Plan shows a distinct urban growth boundary **at Cemetery Road**. The 2015 Hawea Community Association review of the 2003 Community Plan **supported** the formalisation of the long agreed urban growth boundary, as drawn in the PDP Map, whilst acknowledging the rural residential zoning that crept in beyond that. The boundary is a mechanism to stop that creep. The proposed plan is to fill the ample capacity within the boundary first. Consider increasing the township zone density before shifting the growth boundary. Uphold the values of a distinct defined township as identified by the commissioners.

Currently, the lead policy identifies residential and mixed use zones within the Wanaka Urban Growth Boundary of the Proposed District Plan. I suggest there is a whole lot more capacity and scope within this land to achieve rental workers accommodation and high density housing (close to town) that add diversity to our housing market, not just flooding the speculative market with more house-and-garden packages. (Affordable living includes not being dependent on a car.)

I also suggest that council would be prudent and honest to spend time identifying some areas to be categorised “Category 3: Not suitable for the establishment of Special Housing Areas.”

I note that the policy currently dictates that **The *Council will not accept proposals or EOIs from landowners or developers to include areas on this schedule.***

The Council expects landowners and developers to “identify appropriate mechanisms to ensure that housing developed in a special housing area addresses the district’s housing affordability issues”.

Universal Development's sole mechanism seems to be one of scale to achieve a fixed price house-and-section plan. No workers accommodation, smaller sections, apartments, etc etc

What mechanisms are there to ensure these house-and-section packages don't just join the property game that inflates prices? I don't believe the poposed 'covenant' is strong enough: (*comments are mine*)

Universal believes “the scale of the project will disincentivise speculation”(*how?*) and has created rules “ to ensure speculative behaviour is further dampened”.

- **A limit on the number** of sections a single purchaser can purchase.(*how many? Any more than one is speculation*?)

- Applying a **vetting system** to ensure genuine home buyers have priority.(*how?*)

- A developer covenant restricting re-sale of sections within **2 year**s.(*perfect time to onsell)*

- A full 10% deposit for non-KiwiSaver buyers.

I remember that Stage 1 of Timsfield had similar covenants and started out selling the cheapest sections in the district. Commendable and effective at the time: it certainly worked to increase the number of young families in the town and boost the school roll! It can be done without SHA status.

The Community Housing Trust is also not limited to SHAs for acquiring land for their commendable programmes.

The Master Plan for the proposed development south of Cemetery Road is well thought out and connects with infrastructure well. But those are also attributes of any commendable subdivision, not justification for an SHA.

This Master Plan includes a community hub/commercial area to “ensure the development contributes to the Hawea township in a positive way” by the township “becoming a more **sustainable, inclusive, liveable** community.” The developer describes the positive reaction to this concept.

Yes I agree. However, I need to point out that Lake Hawea Township already has a community-built hub in the Lake Hawea Community Centre/Library/Playground/Tennis Court/Bowling Green/ Cricket Field all together at Peter Fraser Park.

There is also commercial land adjacent to the Lake Hawea “Sailz” Store that has been available for development for a long time. The Township Map in the Proposed District Plan identifies a reasonable large local shopping centre zone. So, there is already plenty of opportunity for more retail and business in Lake Hawea.

I suggest creating a second hub would tend to divide rather than unite the Lake Hawea Township with its “unique characteristics” referenced in the EOI.

In conclusion, I believe that that Queenstown Lakes District Council cannot justify altering its SHA Lead Policy in order to add a section of rural land outside the proposed urban growth boundary of Lake Hawea Township to its Category 2 land.

I do not believe that such a large leap for the Lead Policy is justified as any value gained is far outweighed by values lost.

Thank you for your time and consideration.

This is my personal opinion.

Yours

Rachel Brown

Hawea Flat

14 June 2018