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Queenstown Lakes District Council
Planning and Development

Attention:

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LAKE HAWEA TOWNSHIP URBAN GROWTH BOUNDARY – S32 REVIEW

We apologise that our letter is coming to you at the end of the agreed timeframe in the mediation agreement on the Hawea Urban Growth Boundary. However, as you are aware the Hawea Community Association Inc (HCA) is a volunteer organisation and none of the volunteers are town planning experts. We request you read our letter in that light; that we have undertaken our best endeavours to express relevant information from a laypersons point of view. But it is a point of view that we believe particularly relevant in the determination of the Urban Growth Boundary (UGB) for the Lake Hawea Township for this current District Planning process.

The retention of the UGB as advised in Decisions Version Planning Map 17 (DVP Map 17) is overwhelmingly supported by the Lake Hawea Community. Further we believe there is strong expert evidence and town planning reasoning to support that boundary for the foreseeable future.

QLDC STRATEGIC DIRECTION

The Queenstown Lakes District Council (QLDC) has determined, as expressed in the Decision version of the Proposed District Plan (PDP) Chapter 3 Strategic *Direction*, in order to address identified Issue 2: *Growth pressure impacts on the functioning and sustainability of urban areas, and risks detracting from rural landscape, particularly its outstanding landscapes*; that, amongst other matters:

3.2.2 Urban growth is managed in a strategic and integrated manner.
(addresses Issue 2)

- 3.2.2.1 Urban development occurs in a logical manner so as to:
- a. promote a compact, well designed and integrated urban form;
 - b. build on historical urban settlement patterns;
 - c. achieve a built environment that provides desirable, healthy and safe places to live, work and play;
 - d. minimise the natural hazard risk, taking into account the predicted effects of climate change;
 - e. protect the District's rural landscapes from sporadic and sprawling development;
 - f. ensure a mix of housing opportunities including access to housing that is more affordable for residents to live in;
 - g. contain a high quality network of open spaces and community facilities; and
 - h. be integrated with existing, and planned future, infrastructure.
- (also elaborates on S.O. 3.2.3, 3.2.5 and 3.2.6 following)

As we understand it, the District plan Chapter 4 *Urban Development* is critical to the assessment of the placement of Urban Growth Boundaries. It states at 4.1 *Purpose* that: *Urban Growth Boundaries are established for the key urban areas providing a tool to manage anticipated growth while protecting the individual roles, heritage and character of these areas. Specific policy direction is provided for these areas, including provision for increased density to contribute to more compact and connected urban forms that achieve the benefits of integration and efficiency and offer a quality environment in which to live, work and play.*

We believe that the UGB in DVP Map 17 meets all of the requirements of 3.2.2.1 and 4.1 above.

POPULATION GROWTH

We accept that, as stated at 4.2.1.4, Urban Growth Boundaries must encompass sufficient area for growth and should be subject to review periodically.

- 4.2.1.4 Ensure Urban Growth Boundaries encompass a sufficient area consistent with:
 - a. the anticipated demand for urban development within the Wakatipu and Upper Clutha Basins over the planning period assuming a mix of housing densities and form;
 - b. ensuring the ongoing availability of a competitive land supply for urban purposes;
 - c. the constraints on development of the land such as its topography, its ecological, heritage, cultural or landscape significance; or the risk of natural hazards limiting the ability of the land to accommodate growth;
 - d. the need to make provision for the location and efficient operation of infrastructure, commercial and industrial uses, and a range of community activities and facilities;
 - e. a compact and efficient urban form;
 - f. avoiding sporadic urban development in rural areas;
 - g. minimising the loss of the productive potential and soil resource of rural land.
- 4.2.1.5 When locating Urban Growth Boundaries or extending urban settlements through plan changes, avoid impinging on Outstanding Natural Landscapes or Outstanding Natural Features and minimise degradation of the values derived from open rural landscapes
- 4.2.1.6 Review and amend Urban Growth Boundaries over time, as required to address changing community needs.
- 4.2.1.7 Contain urban development of existing rural settlements that have no defined Urban Growth Boundary within land zoned for that purpose.

The QLDC has estimated population growth for Hawea, and has presented this in its Population Projections, December 2018, [extract below].

Hawea for the QLDC Population Projections is the same area as specified by Statistics New Zealand and extends well beyond Lake Hawea Township and includes all the settlements of Makarora, Lake Hawea Township, John Creek, Hawea Flat, Maungwera valley, Dublin Bay and Luggate and the extensive rural population in the surrounds.

While we fully accept that the Lake Hawea Township is the largest of these settlements and is likely to be where urban growth is greatest, we consider it has been and would continue to be seriously misleading for these population projections, and associated dwelling needs, to be quoted in relation to the consideration of the UGB for Lake Hawea Township without also clearly acknowledging the extent of the Hawea geographical Area.

A surprising factor is that the number of persons per house in the QLDC projections varies significantly between areas. Across the district the estimated number of people per house is 2.2 in 2028. For the Hawea area the estimated number of people per house is 1.82 in 2028. Statistics New Zealand in its dwelling projection estimates suggests that on average there are 2.5 people per dwelling. There is no explanation in the Population Projections as to why there are differences between areas (for example population growth of 2300 in Jacks point requires an additional 960 houses; while population growth of 2330 in Hawea suggests 1320 more houses;) Albeit this comparison is not over the same period it is far from clear why the average persons per house would vary across the district and also be lower than the average used by Statistics New Zealand. We note again that Hawea is a much more extensive area than Lake Hawea Township.

Variable	2018	2028	2038	2048	2018 to 2028			2018 to 2048		
					Change	Annual change	% Change	Change	Annual change	% Change
Wanaka Ward										
Residents	12,320	18,300	21,460	24,300	5,980	598	4.0%	11,980	399	2.3%
Total Houses	7,780	10,870	12,830	14,660	3,090	309	3.4%	6,880	229	2.1%
Total Visitors (Average Day)	7,950	10,130	11,100	11,810	2,180	218	2.5%	3,860	129	1.3%
Total Visitors (Peak Day)	34,450	42,990	48,160	52,430	8,540	854	2.2%	17,980	599	1.4%
Average day population*	20,270	28,430	32,560	36,110	8,160	816	3.4%	15,840	528	1.9%
Total Rating Units	9,180	12,870	14,550	16,700	3,690	369	3.4%	7,520	251	2.0%
Wanaka										
Residents	8,720	12,750	15,030	17,070	4,030	403	3.9%	8,350	278	2.3%
Total Houses	5,720	7,800	9,210	10,530	2,080	208	3.2%	4,810	160	2.1%
Total Visitors (Average Day)	5,550	6,970	7,570	7,960	1,420	142	2.3%	2,410	80	1.2%
Total Visitors (Peak Day)	25,720	31,330	34,720	37,460	5,610	561	2.0%	11,740	391	1.3%
Average day population*	14,260	19,710	22,590	25,040	5,450	545	3.3%	10,780	359	1.9%
Total Rating Units	6,930	9,320	10,660	12,290	2,390	239	3.0%	5,360	179	1.9%
Hawea										
Residents	2,880	4,150	4,700	5,210	1,270	127	3.7%	2,330	78	2.0%
Total Houses	1,630	2,280	2,630	2,950	650	65	3.4%	1,320	44	2.0%
Total Visitors (Average Day)	1,070	1,390	1,500	1,570	320	32	2.7%	500	17	1.3%
Total Visitors (Peak Day)	4,730	6,130	6,890	7,520	1,400	140	2.6%	2,790	93	1.6%
Average day population*	3,950	5,540	6,200	6,780	1,590	159	3.4%	2,830	94	1.8%
Total Rating Units	1,800	2,550	2,770	3,100	750	75	3.5%	1,300	43	1.8%

HOUSING CAPACITY

Our understanding in relation to the Operative District Plan (ODP), from the M.E consulting QLDC Housing Hevelopment Capacity Assessment 2017, dated 27 March 2018, Appendix 13 *Medium-Term (to 2026) Commercially Feasible Capacity for Additional Dwellings by Zone (Including Redevelopment)* is that Hawea locality (shopping zone and township) has 410 commercially feasible capacity.

In that same report at Appendix 14 – *Long-Term (to 2046) Commercially Feasible Capacity for Additional Dwellings by Zone (Including Redevelopment)* 610 dwelling units are available. These numbers are based on the ODP.

Further, we understand from the Evidence in Chief of James Douglas Marshall Fairgray on behalf of Queenstown Lakes District Council; October 2018, Appendix E: *Calculated Changes to Plan enabled redevelopment capacity from individual zoning changes in the decisions version of the Plan*, that an additional 354 dwelling capacity was added between the Notified and Decisions Plans.

This makes a potential, before review of the Lake Hawea Township Zone Stage 3 PDP, of an

additional 935 units to 2046; and in the medium term to 2026 an additional 735 feasible dwelling capacity. This would demonstrate, even ahead of stage 3 of the PDP, that the Lake Hawea UGB placed along the north of Cemetery Road, bounded on the other sides by the lake, Muir Road and Domain Road (as set out in DVP Map 17) will more than adequately meet the requirements for Urban Growth Boundaries established by Stage 1 of the District Plan Review.

We understand the arguments regarding vacant land in a town is not the same as having that land able to be developed, however, we believe there is clear evidence of ongoing development of vacant land in the Lake Hawea Township coming to market. We draw your attention to the recent release of the parcel of land within the township zone off Lakeview Terrace. We understand from the advertising could house 73 – 80 sections under the Operative District Township Zone rules and 120 houses if lots sizes were 500-600sqm. These numbers have taken account of roads etc, according to the advertising. The numbers of dwellings could be further increased if Lake Hawea Township zone was up-zoned to Low Density Residential (LDR).

COMMUNITY SUPPORT

The QLDC has agreed specific policies for the Upper Clutha regarding UGBs.

Upper Clutha Basin Specific Policies

- 4.2.2.22 Define the Urban Growth Boundaries for Wanaka and Lake Hawea Township, as shown on the District Plan Maps that:
- a. are based on existing urbanised areas;
 - b. identify sufficient areas of urban development and the potential intensification of existing urban areas to provide for predicted visitor and resident population increases in the Upper Clutha Basin over the planning period;
 - c. have community support as expressed through strategic community planning processes;
 - d. utilise the Clutha and Cardrona Rivers and the lower slopes of Mt. Alpha as natural boundaries to the growth of Wanaka; and
 - e. avoid sprawling and sporadic urban development across the rural areas of the Upper Clutha Basin.
- 4.2.2.23 Rural land outside of the Urban Growth Boundaries is not used for urban development until further investigations indicate that more land is needed to meet demand for urban development in the Upper Clutha Basin and a change to the Plan amends the Urban Growth Boundary and zones additional land for urban development purposes.

The HCA held a public meeting where the community started discussions in anticipation of the Stage 3 of the PDP. The community meeting, held on 11 May 2019, discussed in roundtable forum several topics and the following summarises the emerging views of the community on the PDP. The following forms part of a statement that has been released to the media and is on public record.

PROPOSED DISTRICT PLAN

There was unanimous support for the Urban Growth Boundary to be contained North of Cemetery road, and West of Muir Rd. Township zoning did not need to be extended. This would be kept under review at each review of the PDP; but did not need to move within the

foreseeable future.

The building of Residential Flats should be permitted within the Urban Growth Boundary. The rules around height; land coverage, tree prohibitions etc should be retained along with the rule regarding hedge heights.

The need to ensure that new developments have good sized parks and that QLDC consider developer contributions by way of reserve land.

The Community shared a variety of views on the issue of section size. However, overall there was a clear preference for allowing smaller sections of around 500sqm. Multi-dwellings per lot should also be permitted (such as apartments; units or town houses). But it was important that all dwellings allow for at least two off-street parking areas.

The feeling was that the community wanted to allow for a good variety of dwellings in the area within the Urban Growth Boundary and especially to allow elderly people to stay as an integrated part of the town by allowing them to live in smaller dwellings with less land to care for.

Concerns were deeply held about the current poor quality of infrastructure and the importance that infrastructure be fit for purpose and keep pace with growth of the town. There was clear support for dealing with waste water/sewerage locally; with green solutions being supported. The Community did not want waste water/sewerage transported across the Clutha River to “Project Pure”.

Sense of Community and the environment should come ahead of economic growth. There is a need for public transport in the Upper Clutha and urban sprawl is not seen as the way forward; as protection of arable land is important. Developers and Council should not override the community’s wishes.

The Community supports keeping the UGB in the DVP Map 17, and believes that there is very strong evidence that further infill, by permitting residential flats and multi dwellings, in combination with the ability of the QLDC to notify a zone change to LDR for the Lake Hawea Township Zone (per DVP Map 17) more than meets population growth projections for a considerable length of time. The Community’s position is in line with the QLDC’s policies 4.2.2.22 and 4.4.4.23.

Clearly the UGB is more than adequate for the next district planning cycle. Review of the population data along with up-zoning of the Township Zone will ensure that the UGB is fit for purpose for two or three further planning cycles.

SPECIAL HOUSING AREA

The QLDC agreed the Lake Hawea Township UGB in May 2018 by approving DVP Map 17. The decision of the QLDC to submit an application in December 2018 to the Associate Minister of Housing for a Special Housing Area (SHA) outside of the Lake Hawea Township UGB is, according to the HCA’s legal advice, contrary to the requirements of the HASSHA legislation, and furthermore is contrary to QLDC’s own published strategy and planning policies.

The existence of the SHA application should in our opinion not factor at all in the S32 review. Council has recognized that SHA's are outside the normal planning process and are to be considered special zones.

If it is considered appropriate in the S32 Review process, we would welcome the chance to meet with QLDC staff to discuss and explain our views as we remain acutely aware of our limited ability to explain matters in town planning terms.

Yours sincerely

A handwritten signature in blue ink that reads "April Mackenzie". The signature is written in a cursive style with a long horizontal stroke at the end.

April Mackenzie

Chair

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