WINTON

03 September 2020

Ministry for the Environment PO Box 10362 Wellington 6143 New Zealand

Attention: Sara Clarke

Via Email: fasttrackconsenting@mfe.govt.nz

Dear Sara,

Winton Property Limited: Lakes District Housing Retirement Housing Expansion Proposal Northbrook Arrowtown Proposal

We understand that comments have been sought from Queenstown Lakes District Council ("QLDC") in relation to the Northbrook Arrowtown proposal. Given the challenges that Winton has faced with obtaining an assessment on the merits of a detailed proposal to develop the Ayrburn site, we respectfully seek to ensure that the Minister understands matters relating to the history of the site from our perspective.

Housing Accords and Special Housing Areas Act

In 2014, following the passing of the Housing Accords and Special Housing Areas Act 2013 ("HASHA"), QLDC invited Expressions of Interest ("EoI") for potential Special Housing Areas ("SHA") within the Queenstown Lakes District. In response, Winton submitted a comprehensive EoI to establish 150 residential allotments on the site in February 2015. With what appeared to be little regard to the information presented in the EoI, the QLDC determined not to recommend the proposal to the Minister, citing the following reasons:

- the site was not within or adjacent to an existing urban area,
- there were potential servicing and flooding concerns; and
- the development would create capacity issues on the existing Arrowtown Primary School.

Responding to the above issues (noting in particular that the Ayrburn property adjoins the Millbrook and Waterfall Park Zones, both of which provide for urban development, there are no servicing concerns, and flooding concerns can be fully addressed), Winton submitted a second EoI in November 2015, amending the proposal to enable 201 retirement units plus associated care facilities and community amenities to facilitate an increase in land and housing supply, specifically providing housing for the elderly and staff of the facility. The application did not find favour in Council and was also unsuccessful in obtaining SHA classification.

A further and final EoI was made in June 2016, this time including the adjoining Waterfall Park urban zoned land (which Winton had by then acquired) to establish 140 residential Lots to:

- help alleviate housing affordability issues in the Wakatipu Basin by providing a choice of new medium density and low density residential and rural-residential housing opportunities.
- provide a high-quality housing development, tailored to the special characteristics of the Waterfall Park Zone that would enhance the established rural, residential and open space characteristics that are highly valued in the Wakatipu Basin.
- Unlock the approved development potential within the Waterfall Park Zone (which was granted zoning for about 100 residential dwellings in 1984).

As with the prior two applications, QLDC would not support the proposal, citing similar reasons given in respect to the February 2015 proposal.

The political blocks put in place at the outset of the HASHA process meant that the proposals were never considered on their merits. The concerns that underpinned the Council's decision on whether to recommend the applications to the Minister of Housing were unsubstantiated and were at odds with the expert reports prepared in support of the proposals.

Proposed QLDC District Plan ("PDP")

In 2015, QLDC commenced a review of its District Plan by notifying the PDP. In November 2015 Winton lodged a submission to the PDP seeking an urban zoning for Ayrburn Farm which would enable development of its Northbrook Arrowtown Retirement Village proposal. That process is still ongoing, as previously explained in Winton's fast-track application.

Council continues to oppose Winton's proposal for five basic reasons. Four of the reasons (potential adverse effects on water quality in Lake Hayes, infrastructure concerns, flooding concerns, and Ayrburn not being adjacent to an existing urban zone) are factually incorrect and are not supported by any expert assessment. The fifth reason (landscape effects) is debatable as the area proposed to be developed is largely screened from public vantage points.

Winton has at no stage made a detailed consent application under the Resource Management Act 1991 in respect of the same or a similar project as we have simply not been afforded the opportunity to do so.

The COVID-19 Recovery (Fast-track Consenting) Act 2020 provides an opportunity to progress the Lakes District Housing Retirement Housing Expansion Proposal (comprising both Northlake Wanaka and Arrowtown Projects) through a rigorous consenting process. Based on the expert assessments prepared in support of both applications, Winton is confident that, when assessed on their merits, the respective projects will enable significant employment opportunities and provide much needed retirement housing in the District.

Winton appreciates that it gains a benefit from the fast-track process by being able to pursue these development opportunities sooner than would otherwise be the case. In the ordinary course of events Winton would develop Northbrook Arrowtown first to generate a development profit which would then be invested into Northbrook Wanaka. Fast-track approval for the two

projects will effectively bring development of Northbrook Wanaka forward as both projects will have to be implemented at the same time in order to be achieved within the two-year consent term. That constitutes a significant financial commitment by Winton to assist the Minister to achieve the purpose of the fast-track Act and is the basis upon which the two projects are codependent.

Please feel free to contact me if you require any further information in relation to this request.

Yours sincerely

Chris Meehan

Winton Property Limited