

**Oral submission to the DP hearings Panel on the Urban Intensification Variation.**

**JB and RJ Adams.**

**Tuesday August 26<sup>th</sup> 2025**

Thank you for the opportunity to speak to you today.

- Our submission is limited to the intensification variations affecting the Low Density Suburban Residential Zone in Wanaka.
- We strongly oppose the introduction of these variations in the existing LDSRZ in Wanaka. The existing LDSRZ in Wanaka is not an 'appropriate location' for intensification. According to the NPS-UD fact sheet on intensification, 'appropriate locations' are those that are close to or in urban centres for people to access jobs etc (most jobs in Wanaka are outside the Town Centre), locations well-served by public transport and where there is a high demand for housing and business premises. Please tell us how that strictly applies to the LDSRZ in Wanaka?
- The panel is already aware that the Council's own documents are clear that there is more than sufficient planned capacity in all locations in the district in the short, medium and longer term, based on a high growth scenario, which satisfies the requirements of the NPS-UD. Intensification variations in the LDSRZ are therefore completely unnecessary.
- The changes conflict with the council's own policies in the PDP, particularly 7.2.1.2, and 7.2.1.3, which prioritise the scale and character of the existing suburban residential environment, and the preservation of amenity values, particularly privacy and access to sunlight in neighbouring properties.
- Very importantly, intensification will irrevocably and adversely change the nature of the existing LDSRZ in Wanaka, with impacts on ambience, amenity value, social functioning, light, views, the environment and the future. The proposed changes therefore, do not meet Objective 1 of the NPS-UD "*Objective 1: New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.*" NPS-UD 2022
- Intensification to this degree will slowly but surely change the LDSRZ to rows of two storey townhouses where family and holiday houses now stand. Is this what is wanted for this generation's grandchildren and their children?
- The Council and you as panel members have a duty of stewardship to our incomparable town, lake and surroundings, and we ask you to discharge that duty and recommend that these variations not proceed in the existing LDSRZ in Wanaka.

We have holidayed with our family in the Wanaka area for nearly 50 years. We bought our modest three bedroom house in 1989, when Low Density meant what it said. When we made some small alterations 15 years ago, it was on the basis that our outlook, privacy and sun could not be compromised under the then existing regulations.

This proposed variation shifts the goal posts completely, while everyone is still playing.

It is the older area of the Wanaka LDSRZ with older houses and larger sections that is going to suffer. For instance, our section is 1000sq m – the norm at the time. If the variation to decrease the section size to 300 sq m, and increase the allowed height from 7m to 8m comes into force, a developer could buy our house and build three 8m high two storey townhouses on our site, possibly, without parking.

Who and what could possibly benefit from this?

- Certainly not our neighbours, whose sun, outlook, privacy, peace and quiet and atmosphere would be severely compromised.
- Those looking for more affordable houses would certainly not benefit. For instance, two new 3br townhouses in Eely Point Road are selling for \$2.4m each. Any idea that this variation would increase housing affordability is pure fantasy. Existing housing is cheaper.
- The children who might in the future live in one of the townhouses would not benefit. Private space to play will be no more. No additional public recreation areas can or will be created. The same local public recreation areas will have to service a significantly increased number of people. More people crammed into the same area will decrease the enjoyment for all.
- The atmosphere, look and ambience of the older Wanaka LDSRZ will not benefit. The streetscape and atmosphere in older Wanaka that attracts people to live here, and visitors, will be irrevocably altered - killing the goose that is laying the golden egg. If panel members have spent any time out on Lake Wanaka, as we have for decades, you could not miss what this kind of change on land would look like. We are also sure that you can imagine what will happen to the streetscape in the existing areas. Is destroying the attractiveness of Wanaka for future generations good stewardship?
- The environment will not benefit – in fact, it will suffer. We know our lake is already degrading. The description of the water quality has already been downgraded. The long-term water quality rating by Land Air Water Aotearoa (LAWA) drop from "excellent" to "good" in the lake, signals an increase in contamination over the last five years. We were appalled in March of this year when people were advised not to swim at the main beach because of e-coli contamination. In an article on the issue in the ODT on the 6<sup>th</sup> of March, Wai Wanaka's research and science lead, Ben Youngman was quoted as saying that increased development across the area would likely increase contamination if no alteration was made to practices. The Deputy Mayor and a councillor noted that infrastructure and waste management were crucial factors in the contamination and said that the growth that had been experienced in a short time had created a whole lot of infrastructure demands. In this context, what does anyone seriously think that more houses, more people and more impervious surfaces in the same existing area is going to do? We have no confidence that infrastructure will be improved in a timely and sufficient way to prevent further pollution. At least with new developments, infrastructure can be planned with sufficient capacity.
- There is, however, no doubt that developers will benefit from the change. Those with money will make more. There will be increased opportunities to squeeze more houses

onto existing sections, increasing profit. The pursuit of profit often has little regard to the impact on neighbourhoods and the environment. Developers will work up to the limit of the regulations.

- A few years ago, a developer bought an older house in our area, and was living there. We had a discussion with him. He explained that his plan, which did not come to fruition, was to knock down the existing serviceable house, and build two townhouses with attached 2 bedroom flats. His opinion was that he would become able to build two stories straight up on the back boundary of his section. I naively asked him “will you be living in one of the new houses?” “No,” he said, “we will move somewhere with more space.”

Policy 5 of the NPS-UD says that Councils should in tier 2 and 3 zones: “Enable building heights and densities that reflect the relative demand for use, and the level of accessibility from planned or existing active transport.” (Introductory guide to the National Policy statement on Urban Development 2020 p9 ‘Providing for Intensification’.)

Almost nowhere in Wanaka is far from active transport facilities – even areas that are under development. There is no need to pack more people into the existing older low density area to achieve accessibility.

Relative demand for use? As above, the Council itself says demand can be met without destroying the existing low density urban environment in Wanaka.

Wanaka is not Auckland. It is not Queenstown. Panel members have the choice to preserve what we have for future generations.

Policy 6 of the NPS -UD says that decision makers have to have particular regard to the fact that changes may cause significant changes to an area that may detract from amenity values appreciated by some people though improve amenity values appreciated by others, but that the changes: *(ii) are not, of themselves, an adverse effect* (NPS – UD updated 2022. Policies P11)

We would submit that it is crystal clear that these proposed variations in the low-density zone in Wanaka, in and of themselves, will have an adverse effect.

The council relies heavily on the NPS-UD in the section 42 reports to justify intensification in the LDRSZ, and therefore reject virtually all opposing submissions to their proposal. In our view there is a considerable difference between measures that might be supported or consistent with the NPS-UD, and those that are actually required.

(SECTION 42A REPORT OF AMY BOWBYES ON BEHALF OF QUEENSTOWN LAKES DISTRICT COUNCIL CHAPTER 2 Definitions - TEXT CHAPTER 4 Urban Development- TEXT CHAPTER 7 Lower Density Suburban Residential Zone- TEXT 6 June 2025)

The LDSRZ Section 42 report acknowledges that amenity value in the low density zone will be impacted detrimentally by the intensification changes, particularly by smaller section sizes and increased height. The report is explicit that the changes are being recommended to enable 2 storey infill housing in the zone, and it makes a clear value judgement that such development at the cost of amenity value, is better.

*“6.136 A key aim of the notified UIV is to enable intensification including within the LDSRZ, partly through amending provisions that are preserving the status quo by protecting existing amenity at the cost of limiting opportunities for infill development.”*

*6.139 In my view, bespoke lower height limits are not justified, given the NPS-UD direction to intensify, the methodology proposed, and the approach taken by the Council to amend provisions within the LDSRZ to reduce barriers to achieving densities anticipated in the LDSRZ. I consider the 8m height limit will enable more efficient use of urban land, will better enable two storeys and that the notified changes respond appropriately to the zone’s level of accessibility and relative demand.*

*6.143 Whilst submitters seek that current levels of amenity are retained, in my view, Policy 6 of the NPS-UD provides support for the changes to amenity that will result from the notified building heights.*

We beg to differ from that view and opinion.

We want to note that to ordinary ratepayers such as ourselves, this whole process is impenetrable. The huge volume and complexity of documents, the planning and legal jargon, and the rejection of opposing opinion by planning staff in the section 42 report, make it feel as though we are banging our heads against a brick wall, and mean that actually hearing and taking seriously what many of us who live and holiday in Wānaka think, very difficult.

We are here today to provide something of this voice. We know from conversations we have had with our neighbours and others with property in Wanaka, that our views are shared and supported.

I want to finish with a whakatauki:

**“Mō tātou, ā mō kā uri ā muri ake nei.”** (For us and our children after us.)