SUBMISSION OF LINDSAY WILLIAMS
TO THE HEARING PANEL AT WANAKA 14/07/2020

1. I have recently constructed a new dwelling at 289 Peninsula Road, Queenstown, where I live. The property fronts onto the Kelvin Heights trail and Frankton Arm (Lake Wakatipu). A narrow strip along the northwest boundary of my land has been identified as having Wahi Tupuna values and is an arbitrary line that should follow the cadastral boundary.

2. My submission is that Wahi Tupuna should be removed from my land. Wahi Tupuna values on my land are redundant by virtue of the established residential zoning and use of the land and Wahi Tupuna duplicates existing processes designed to preserve and protect such values, and there are other established and well proven provisions giving effect to preservation of Wahi Tupuna values, if any, that may have survived on my land.

3. Given the steep nature of the site, we had to obtain resource consent to construct our dwelling (RM171156). The cost to obtain resource consent, including consultants' fees, was considerable and took just over 13 months.

4. Had we also had to obtain consent under the proposed Wahi Tupuna provisions, those costs and the timeframes would likely have escalated.

5. I understand one of the main drivers of Wahi Tupuna is the protection of archaeological values. However, I understand there are already mechanisms in place to protect such values, one being the Heritage New Zealand Pouhere Taonga Act 2014 which protects all pre-1900 archaeological material. Condition 18 of our consent imposed an Accidental Discovery Protocol should an archaeological or Koiwi tangata have been discovered at the time of excavation. The proposed Wahi Tupuna provisions would therefore duplicate provisions that are already in place.

6. The Wahi Tupuna provisions also duplicate, I understand, provisions of the Ngāi Tahu Claims Settlement Act 1998 whereby Manawhenua must already be consulted in relation to any resource consent on or adjacent to, or that may affect, land that is the subject of a Statutory Acknowledgement (SA) as part of any activity that requires resource consent. Our land is located adjoining an esplanade reserve beside Lake Wakatipu, and while I understand we did not need to do this, as we do not directly adjoin the water, the Wahi Tupuna would effectively cause such consultation by extending the SA area onto our land, without needing to cross our land.

7. We undertook considerable earthworks on our land, necessitated by its steep topography and the need to excavate for deep footings into rock. Conditions of our resource consent required us to implement measures to contain sediment runoff, dust and other potentially polluting and nuisance matters, within our land boundaries. Again, Wahi Tupuna consultation will add nothing to the outcomes produced by the existing council controls and resource consent conditions.

8. It is unreasonable to impose upon residents an extra consenting process when developing residentially zoned land with complying activities and when there are sufficient controls in place, as outlined above.

9. The historical methodology of written provisions in the District Plan relating to objectives and rules for residential land and conditions of resource consent, have worked well, are proven, and have not led to destruction of Manawhenua values. In my opinion, the Wahi Tupuna provisions duplicate existing provisions and add nothing but unnecessary time and cost **when placed upon existing residentially zoned land parcels.** I understand a vast number of submitters hold similar views.

10. I support D. Williams (3388) submission that the earthworks limit of 10m3 will be a barrier to affordable housing in the District. It is well known there has been a severe housing affordability crisis in this District. The current economic climate may temporarily relieve that however it is inevitable that in the near future the crisis will again become a prominent issue. In 3.44 of the Planners S42 report the planner rejects D. Williams concern saying stating ' *This will result in additional cost, but I consider that these would generally be a small cost and would not represent a barrier to housing.*'

11. The Planner appears to express an arbitrary view unsupported by analysis as to the cost increase as a percentage of average house build cost, or consider the effect of higher value residential building facilitating established pattern of progression of homeowners from lower to higher cost housing, thereby increasing supply.

12. Every cost adds up and unnecessary regulatory cost should be avoided wherever possible. Preparing an application is always relatively involved, usually requires expert input, likely to cost around $1500. If a cultural assessment report is required, which I understand will only be accepted from appropriately qualified persons, then at least another $2000 is likely. Then there are the usual applications fees and related disbursements. It is likely the cost may be in the order of $3,500 – $5,000. This is a significant additional cost for any new dwelling build, not just affordable housing. As I have set out earlier, in my view there seems to be no improved outcome as a result, only duplication and additional time.

13. I am concerned that the Planner's S42 report brushes aside a considerable number of submitters views. The Planner appears to take the view that unless Runaka confirm changes are appropriate then submitters views be rejected. That abdicates the responsibility to be impartial and weigh viewpoints. The Planner appears to simply states that only one view point should be considered, and thereby fails to deliberate further. (ref S42, 4.5, 4.14.)