

BEFORE THE QUEENSTOWN LAKES DISTRICT COUNCIL

UNDER the Resource Management Act 1991

IN THE MATTER A variation to the QLDC Proposed
District Plan – Urban intensification

BETWEEN **Friends of Arrowtown Village**

Various Submitters

STATEMENT OF EVIDENCE OF HEIKE BRIGITTE LUTZ

HERITAGE

4 July 2025

Statement of evidence of Heike Brigitte Lutz

Introduction

- [1] My full name is Heike Brigitte Lutz. I am the director of BCon Consultants Ltd, an Auckland based architectural building conservation practice.
- [2] I am a building conservation consultant and hold a Master of Architecture degree from the Technical University of Applied Sciences in Berlin, Germany. I have 40 years of experience in the architectural and building conservation fields. I am an Independent Hearings Commissioner for a number of Councils nationwide, and I am an accredited Mediator.
- [3] For over 20 years I have been successfully involved in hearings and resource management matters as an Independent Hearings Commissioner, Duty Commissioner, and as an Expert Witness at Council and Environment Court hearings.
- [4] I have recently been part of the Independent Hearings Panel for Wellington City Council's Proposed District Plan review, including the implementation of the NPS:UD and MDRS into their Plan as a Tier 1 authority, and I am currently on the Hearing Panel for PC13-Heritage in Christchurch, and for PC63-Heritage in Whanganui.
- [5] I am also engaged by several clients, with regards to the Auckland Unitary Plan (AUP) Plan Change 78 (PC78). I have undertaken character assessments for these clients, based on Auckland Council's methodology, and have provided expert evidence and taken part in expert conferencing.
- [6] Throughout my professional practice, I prepared thematic frameworks for District Plans, design and heritage guidelines, heritage area management plans, and provided statutory and policy advice and development for Councils relating to heritage. During my career, I have assessed over one hundred heritage buildings for private and institutional clients, as well as for numerous councils.
- [7] Full details of my qualifications and experience are set out in **Appendix 1**.

Code of Conduct

[8] Although this is a council hearing, I have read the Environment Court Code of Conduct for expert witnesses contained in the Environment Court Practice Note 2023 and agree to comply with it. I confirm that the opinions expressed in this statement are within my area of expertise except where I state that I have relied on the evidence of other persons. I have not omitted to consider materials or facts known to me that might alter or detract from the opinions I have expressed.

Submitters represented

[9] My evidence is presented on behalf of The Friends of Arrowtown Village (**Friends**). The Friends has been formed as a consortium group to more efficiently and effectively represent a number of submitters on the Variation who have aligned interests. The full list of submitters and their individual submissions is explained in the evidence of Mr Hosie.

Scope of evidence

[10] This evidence relates to the historic heritage values and significance of Arrowtown and the township's particular special character and amenity in relation to the Urban Intensification Variation, proposed by Queenstown Lakes District Council (**QLDC**). It has been prepared in response to the proposed intensification provisions affecting the township of Arrowtown, specifically the introduction of increased height and density allowances in the Medium Density Residential (**MDR**) and Low Density Suburban Residential (**LDSR**) zones immediately adjoining the Arrowtown Residential Historic Management Zone (**ARHMZ**).

[11] I am familiar with the Arrowtown village area and have undertaken a site visit on 12 May 2025, accompanied by Mark Hosie and David Clarke.

[12] I have prepared an objective and independent Historic Heritage and Character Impact Assessment for Arrowtown (**Appendix 2**), dated 24 June 2025, to inform this evidence, and to provide further detail.

[13] As background information and for the preparation of this evidence, I read the following documentation:

- (a) QLDC s42A Report prepared by Ms Amy Bowbyes dated 6 June 2025
- (b) QLDC urban design evidence prepared by Mr Cam Wallace dated 6 June 2025
- (c) QLDC heritage evidence prepared by Mr Richard Knott dated 6 June 2025
- (d) QLDC s32 assessment and related attachments including the Urban Design Report prepared by Mr Cam Wallace of Barker & Associates
- (e) Draft Statements of Evidence from Mark Hosie, David Clarke, and presentations from Justin Wright

[14] My evidence is structured as follows:

- (a) Historic background of Arrowtown;
- (b) Characteristics of Arrowtown;
- (c) Effects of the proposed Variation on heritage values and character;
- (d) Response to QLDC's s42A report,
- (e) Conclusion

[15] A summary of my evidence is set out below.

Summary

[16] Arrowtown is one of New Zealand's most intact gold rush settlements, with its origins dating back to 1862. Its development was closely tied to the terraced landscape and the Arrow River, resulting in a compact, organically laid-out township. Following the decline of mining in the early 20th century, minimal redevelopment occurred, allowing much of the original built form, lot layout, and street pattern to remain intact. This long period of dormancy effectively preserved the town's historic character, later reinforced by formal protections under planning instruments and the implementation of the Arrowtown Design Guidelines 2016.

- [17] The township's unique identity stems not only from its historic buildings but from its broader character. Arrowtown exhibits a modest built scale, informal street layout, mature tree cover, and strong integration with its surrounding landscape. This applies across both, the historic core and surrounding residential areas, where later development has typically respected the established pattern through low-rise, detached housing with generous setbacks and cohesive design elements. The result is a rare and highly valued example of a heritage township that functions as a living community.
- [18] The PDP introduces significant changes through the Urban Intensification Variation (**UIV**), aiming to accommodate intensification. While the ARHMZ and historic town centre are excluded from the proposed changes, surrounding areas, particularly in the MDRZ and LDSRZ, would see substantial increases in development potential. This includes height limits of up to 12 metres in the MDRZ and 8 metres in the LDSRZ, the removal of minimum lot sizes, and relaxed recession plane and setback controls.
- [19] Although some moderation has been recommended in the s42A Report, such as lower heights and partial retention of design controls, the recommendations still permit built outcomes that represent a significant shift from the established character. For instance, even under the revised framework, the potential for three-storey development immediately adjacent to the heritage core would introduce stark contrasts in scale and disrupt the coherence of Arrowtown's townscape. The application of the Design Guidelines remains limited, particularly for permitted activities, further weakening character protection.
- [20] The likely effects of the UIV include erosion of the consistent built scale, reduced vegetation and open space, and diminished visual cohesion across the township. These changes are inconsistent with both the specific objectives for Arrowtown in the PDP and with section 6(f) and 7(c) of the RMA, which require protection of historic heritage and maintenance of amenity values. Infrastructure challenges, particularly around stormwater management and traffic, further compound the risk

to the heritage fabric, especially in older areas reliant on traditional swale systems.

[21] Arrowtown's identity depends on more than its heritage zones; it is the continuity of form, rhythm, and relationship between buildings, open space, and landscape that gives the town its unique character. This integrity is already vulnerable under the current regime and would be further undermined by the proposed variation, even in its revised form.

[22] In conclusion, the scale of change enabled by the UIV is not appropriate for a settlement of Arrowtown's size, function, and heritage sensitivity. A more conservative, context-specific approach is required to ensure the town's enduring character and cultural significance are not lost to poorly managed intensification.

Historic background of Arrowtown

[23] Arrowtown is recognised as one of New Zealand's oldest and most intact 19th-century gold mining settlements. The initial development following gold discovery in 1862 rapidly created a compact township with vernacular timber and schist buildings, laid out in response to topography, and the Arrow River. The Chinese settlement along Bush Creek remains a vital part of the town's cultural heritage identity.

[24] Following the decline of gold mining by the early 20th century, Arrowtown's population diminished and economic activity slowed, resulting in minimal replacement of early buildings. This period of relative dormancy preserved the historic street layout and built form, which now underpin Arrowtown's heritage value. The absence of pressure for redevelopment enabled an unusually high degree of intactness for buildings, streetscapes, and lot arrangements.

[25] From the 1950s onward, increased awareness of Arrowtown's heritage significance led to the acquisition and adaptive reuse of cottages for holiday homes. The Borough Council facilitated development on leased land near the historic core. Later planning instruments, beginning with the Lakes Queenstown Wakatipu Combined Transitional District Plan,

formalised heritage overlays, character zones, design control provisions, and tailored objectives and policies pertaining to Arrowtown character.

- [26] This historic trajectory, marked by low-scale organic growth, deliberate heritage conservation, and application of design guidance (most notably the Arrowtown Design Guidelines 2016), has resulted in a distinctive and highly valued townscape.
- [27] Heritage values consistent with section 6 of the RMA are located within the overlay areas excluded from the Variation. However, the historic influence extends beyond these areas, contributing to the distinctive character and amenity that is evident throughout the wider village.

Characteristics of Arrowtown

- [28] Arrowtown lies within the Queenstown Lakes District, covering an area of 3.61 km² following a boundary adjustment in 2023, up from 2.36 km². The permanent population, according to the 2023 Census, is 2,883. However, population fluctuates due to a high proportion of non-resident ownership and holiday home usage, with substantial seasonal variation.
- [29] Arrowtown's architectural and streetscape character is the product of its gold rush origins, historic continuity, and carefully managed growth. The township exhibits a rare blend of preserved 19th-century vernacular buildings and sympathetic modern development, shaped by strong community values and responsive planning controls.
- [30] The historic core retains simple timber and schist structures, including cottages, shopfronts, and public buildings, reflecting utilitarian goldfields architecture. These buildings are modest in scale and footprint, largely single storey, closely follow the landform, and maintain a close relationship with the street as envisaged in the Arrowtown Design Guidelines 2016. The Chinese settlement along Bush Creek adds further cultural depth.
- [31] Subsequent expansion from the 1960s occurred beyond the heritage precinct, introducing holiday homes and later low-density suburban housing. Developments such as the southern end of Arrowtown, Butel Park, and Essex Avenue feature detached dwellings, predominantly

single-storey, with generous setbacks, pitched roofs, and expansive landscaping that echoes the town's small-scale character. More recent homes incorporate modern design elements while mostly remaining subject to strict design guidelines, ensuring continuity in height, materials, colours, and massing.

- [32] Arrowtown's street network is informal and organic, following topographical contours rather than rigid grids. Streets are narrow and pedestrian-friendly, with varied building setbacks and irregular lot shapes in the older areas, giving rise to a human-scaled and visually engaging townscape. Buckingham Street forms the civic and commercial heart, defined by its historic facades and walkable layout.
- [33] Mature trees, particularly exotic avenues of oaks, elms, and sycamores, are a key part of the visual identity, contributing seasonal character and softening the built form. Open spaces such as the Village Green, river corridor, and several linked pocket parks provide visual relief and strengthen Arrowtown's rural-alpine character.
- [34] Arrowtown exhibits an organically evolved, coherent built environment. Its architectural and streetscape character is distinguished by modest scale, diverse yet harmonious forms, and strong integration with its landscape setting. This character is unique within the district and central to Arrowtown's identity as both, a heritage township and a living community. This is supported by specific design guidelines particular to Arrowtown which are exclusive to its special character and form.
- [35] Mr Knott in his evidence confirms this uniqueness¹, and the fact that the ADG 2016 covers the entire township, including the areas outside the historic heritage zones, which he considers an 'unusual approach', that indicates the distinctiveness of Arrowtown.
- [36] Ms Bowbyes in her s42A report², notes also that Arrowtown is different and cannot be compared with any other town, particularly in the application of a MDRZ.

1 QLDC heritage evidence prepared by Mr Richard Knott dated 6 June 2025, paras 6.5 and 6.8

2 QLDC s42A Report prepared by Ms Amy Bowbyes dated 6 June 2025, para 4.42

[37] In summary, the values that are at risk are not limited to the recognised historic heritage values of the Town Centre and the ARHMZ, but extend more broadly to include:

- (a) the continuity and coherence of the established character across the wider area;
- (b) the underlying pattern of subdivision, open space, built form, and streetscape that defines Arrowtown's spatial structure;
- (c) the landforms and natural features that contribute to both the visual qualities of the landscape and the contextual relationship between buildings and topography;
- (d) the scale, form, and architectural values of buildings, particularly in relation to their landscape setting; and
- (e) the distinctive qualities of the streetscape, including rhythm, enclosure, and overall visual cohesion.

[38] Mr Knott confirms this in his evidence saying that the wider Arrowtown character is of importance to the heritage values and provides for a sense of place³.

Effects of proposed Variation on historic heritage and character (as notified)

[39] It is acknowledged that the UIV does not apply to Arrowtown's Old Town, which is zoned ARHMZ, or Arrowtown Town Centre, nor to the Historic Commercial Precinct. These areas retain height limits of 5 metres and 7 metres respectively.

[40] However, intensification is proposed in two primary areas, the MDRZ located immediately south of the Old Town and ARHMA, commonly referred to as New Town, bounded to the north by Kent, Suffolk, and Ford Streets, and to the south by Fox's Terrace and Preston Drive. This

³ QLDC heritage evidence prepared by Mr Richard Knott dated 6 June 2025, para 7.4, and Appendix 1 para 12

also includes the western part of New Town encompassing Butel Park and Essex Avenue; and the LDSRZ, located further south of New Town.

[41] Intensified development may give rise to changes that compromise the values of the wider area, including:

- (a) the overall pattern and rhythm of development within the neighbourhood;
- (b) the number, scale, and extent of buildings, structures, hard surfaces, and modifications to topography and vegetation;
- (c) the landscape quality of sites, particularly the spatial relationship between built form, open space, and the street; and
- (d) the coherence and consistency of built character, including architectural form, materiality, and siting.

[42] In essence, Arrowtown is distinctive from its wider surroundings and is considered to possess a character that, in its entirety, is worthy of retention. These are areas that, at a broad level, are recognised as special and sufficiently unique to warrant specific management, particularly in combination with the historic heritage values of the township. This is also consistent with section 7(c) of the RMA, which directs particular regard to the maintenance and enhancement of amenity values.

[43] Under the PDP height limits within Arrowtown specifically are 6m for sloping sites and 6.5m for flat sites. The effect of the Intensification Variation to the PDP would allow heights of up to 12m (11m + 1m pitched roof) in the MDR zone and 8m in the LDSR zone. In the MDR zone, minimum lot sizes (currently 650m²) and the one-dwelling-per-site standard would be removed, enabling two units as permitted and three or more dwellings per site as a restricted discretionary activity.

[44] Recession plane controls are also weakened. Under the PDP, a 2.5m height applies to all boundaries with a 35° angle to the south, 45° to the east and west, and 55° to the north (except roads and reserves) in the MDR. The UIV removes this, applying a common height of 4m and a 60°

angle for the north, east, and west, and a 35° angle for the south. These changes, particularly when combined with increased height, would substantially alter Arrowtown's low-rise, open character.

[45] Recession planes are essential to preserving sunlight access, privacy, spatial openness, and the town's established amenity. This is especially important for heritage buildings constructed with moisture-sensitive materials and reliant on natural drying. Reducing solar access may accelerate deterioration and compromise building integrity.

[46] The PDP includes specific height and density provisions for Arrowtown, which relate to specific objectives and policies across both the LDSRZ and MDRZ chapters as follows:

(a) LDSRZ 7.2.4 Objective - Residential development in Arrowtown compatible with the town's existing character.

Policies:

7.2.4.1 Ensure development, including infill housing, community activities and commercial development is of a form that is compatible with the existing character of Arrowtown, guided by the Arrowtown Design Guidelines 2016, with particular regard given to:

- a. building design and form;*
- b. scale, layout and relationship of buildings to the street frontage(s);*
- c. materials and landscape response(s).*

7.2.4.2 Avoid flat roofed dwellings in Arrowtown.

(b) MDRZ 8.2.4 Objective - In Arrowtown medium density development occurs in a manner compatible with the town's character.

Policies:

8.2.4.1 Ensure development, including infill housing, community activities and commercial development is of a form that is compatible with the existing character of Arrowtown, guided by the Arrowtown Design Guidelines 2016, with particular regard given to:

- a) building design and form;*
- b) scale, layout and relationship of buildings to the street frontage(s);*
- c) materials and landscape response(s) including how landscaping softens the building mass relative to any street frontage(s)*

8.2.4.2 Avoid flat roofed dwellings in Arrowtown.

[47] While intensification is generally directed to areas near services, Arrowtown does not function as a metropolitan centre. The entire township lies within roughly a 1.5 km radius, well within a 20-minute walk. It lacks a secondary school, has only one small supermarket outside the centre, and limited community infrastructure. Applying intensification models designed for large urban areas (e.g. Auckland or Christchurch) to a small heritage township of 2,883 residents over 3.61 km² risks significant adverse effects on the special character and heritage values unique to Arrowtown which are set out above.

[48] Arrowtown's wider character is not limited to the ARHMZ. Residential areas surrounding the Old Town exhibit compatible scale, form, and layout, serving as a visual and spatial buffer. The Arrowtown Design Guidelines 2016 have enabled sensitive growth while preserving consistency in massing, materials, and landscaping. Recent developments such as the Queenstown Lakes Community Housing Trust (**QLCHT**) housing demonstrate that two-storey dwellings can deliver housing variety without substantial height increases or character compromise.

[49] The proposed 12m height limit directly adjacent to the ARHMZ, particularly along Kent, Suffolk, and Ford Streets, would create a stark and unbalanced transition, with three-storey buildings opposing the heritage appeal. Such contrast is unsuitable in Arrowtown's narrow streets and compact urban fabric. While updated Design Guidelines may accompany the PDP, their effectiveness is diminished if permitted activity rules and standards are overly enabling.

[50] Any buildings exceeding two storeys are likely to disrupt the town's scale and character. The Proposed Design Guide Changes 2023 themselves emphasise that scale and massing must not overwhelm the established character, particularly in proximity to the ARHMZ.⁴

[51] As an example, the following images show the visual contrast and dominance effect clearly:



Kent St at present (Justin Wright)



Kent St showing Medium Density Typology alongside ARHMZ (Justin Wright)

⁴ Proposed Changes to the Design Guide- Summary- to be notified separately at pp 95, 107,117.

- [52] 1.5 - 2-storey development, subject to robust urban design assessment under the ADG 2016, can provide for growth without undermining historic heritage and special character values. This would align with the existing LDR and MDR provisions, alongside the application of the Arrowtown Design Guidelines where consent is required.
- [53] Examples of such development exist in Arrowtown and show that well-designed infill can support housing needs while remaining contextually appropriate.
- [54] Arrowtown's distinctiveness lies not only in its heritage origins but in the consistent scale, vegetated character, topography and panoramic alpine views and backdrop, as Mr Knott also acknowledges⁵. The proposed LDSR and MDR provisions threaten this by introducing bulkier, higher structures, especially where recession planes are relaxed. Greater site coverage and reduced setbacks would diminish landscape permeability, reduce planting opportunities, and shift the character toward more urbanised typologies.
- [55] As introduced, these provisions conflict with the specific objectives for Arrowtown and are inconsistent with the intent and overall character promoted in the ADG, rendering them unsuitable and no longer fit for purpose in consent assessments.
- [56] Although new buildings may incorporate elements of Arrowtown's character (e.g. gable forms or schist cladding), their bulk and scale cannot be reconciled with the established setting. Height alone is enough to overwhelm, as is evident in the following images, and as can be seen in the evidence of Mr Wallace in his Figure 16:

⁵ QLDC heritage evidence prepared by Mr Richard Knott dated 6 June 2025, Appendix 1 para 22

⁶ QLDC urban design evidence prepared by Mr Cam Wallace dated 6 June 2025



Adamson Drive existing character, 12m scaffolding to left as visual aide.
(Justin Wright)



Adamson Drive 12m townhouses, with considerable change of character.
(Justin Wright)

- [57] Comparable heritage towns such as Akaroa, Coromandel Township, Thames, and Greytown have taken a more context-responsive approach. Akaroa has been excluded from intensification under Christchurch City's response to the NPS-UD due to its small scale and significant heritage value. Greytown is reviewing growth strategies but has excluded heritage and character zones from intensification, introducing buffer areas to provide transitions.
- [58] Arrowtown faces long-standing housing pressure, but its drivers, heritage appeal, lifestyle migration, and seasonal tourism, are not addressed through increased density alone.
- [59] Tourism has revitalised Arrowtown's economy but also placed pressure on its infrastructure and amenity, as well as has increased permanent population without significant infrastructure upgrades. According to the s32 Report⁷, climate change and intensification raise the potential for stormwater overflow and flooding. I note that particularly the older areas of Arrowtown have limited capacity within their traditional swale systems to accommodate increased runoff from less permeable surfaces, potentially risking flooding in and around the older building stock with little protection against such damage.

Response to QLDC's s42A Report

Ms Bowbyes

- [60] Ms Bowbyes' recommendations were informed by the submissions received and the technical expert evidence available to her. As a result, she proposed a number of changes to the notified UIV.
- [61] In relation to heritage and character, Ms Bowbyes noted that section 6(f) includes historic sites, structures, places and areas, as well as their associated surroundings. In my interpretation, this enables consideration of the broader setting of an area, comparable to the recognition of an 'Extent of Place' associated with an individually scheduled heritage item.

7 QLDC s32 assessment and related attachments including the Urban Design Report prepared by Mr Cam Wallace of Barker & Associates

- [62] It is my view, that this point exactly is what is relevant in the management of heritage and character values of Arrowtown. As Mr Wallace noted in his s32 report⁸, he singled out the Arrowtown Town Centre, the Historic Commercial Precinct, and the ARHMZ as three elements falling into the ambit of s6(f), and therefore being excluded from the UIV. However, in my view, he disregarded the importance of the surroundings of those areas to their heritage values, which require a level of protection also. As mentioned above, Arrowtown has a unique character, that cannot be split up in parts, from a heritage point of view. In that respect, Ms Bowbyes also acknowledged the significance and importance of the landscape of the wider area⁹.
- [63] With regards to infrastructure pressures, Ms Bowbyes notes that adjustments and changes to roads and swales will become a requirement to accommodate intensification and the resulting increase of traffic¹⁰. Particularly the older parts of Arrowtown already experience significant pressure in that respect. However, the changes required with further increased traffic pressures will have significant adverse effect on the heritage values of the area, and will result in considerable change in character. The swales system, for example, forms part of the historic fabric of the protected areas.
- [64] In paragraph 4.75 of her evidence, Ms Bowbyes addresses concerns regarding biodiversity and vegetation, noting that while many Arrowtown properties contain established planting, the PDP does not require its retention (except for notable trees). While this is factually correct, in my view, increased infill development is nonetheless likely to result in the removal of substantial vegetation, which would adversely affect the character of Arrowtown.
- [65] Although Ms Bowbyes supports a more modest uplift in development potential, I consider that the proposed changes would still generate

⁸ QLDC s32 assessment and related attachments including the Urban Design Report prepared by Mr Cam Wallace of Barker & Associates, para 6.2.3

⁹ QLDC s42A Report prepared by Ms Amy Bowbyes dated 6 June 2025, para 4.25

¹⁰ Ibid, para 4.65

adverse effects on amenity values and undermine Arrowtown's distinctive character, and heritage qualities.

Mr Knott

- [66] Mr Knott provided heritage and urban design evidence for Council to inform the s42A report. I generally agree with his description of the character of Arrowtown, and the historic heritage and character values he described.
- [67] I concur also with his assessment that some buildings constructed as permitted activities under the Proposed District Plan (PDP) have resulted in built forms that are out of character with the established identity of Arrowtown. Because these developments did not trigger resource consent, the Arrowtown Design Guidelines were not applied, as their use is only required when a rule is breached, meaning the guidelines have limited influence in shaping design outcomes at that level.
- [68] In my opinion, this already highlights a vulnerability within the current planning framework, where the cumulative effects of permitted development may gradually erode Arrowtown's established character. Such outcomes risk being inconsistent with the relevant objectives and policies of the PDP. Any further relaxation of the existing provisions would, in my view, amplify this risk and undermine the long-term protection of Arrowtown's unique character.
- [69] Where I disagree with Mr Knott is in his conclusion, that the provisions recommended by Ms Bowbyes' Strategic Evidence Appendix 1 will ensure that Arrowtown's sense of place, and character and heritage values will be maintained.
- [70] From an architectural point of view, increasing the restricted discretionary height band in the LDRZ from 6.5 to 8 metres is significant. Although 6.5 metres already allow for two storeys in some cases, it typically results in single-storey forms. An increase to 8 metres would enable much more dominant, visibly large two-storey buildings (and in cases three storeys), shifting the perceived scale and character of the

townscape, particularly given that such developments would remain anticipated activities.

- [71] In the Medium Density Residential Zone, increasing the height limit from 7 to 8 metres, along with a 1-metre roof pitch allowance, is presented as a means of retaining two-storey development. However, in practice, this change facilitates the realistic possibility for three-storey built form. Even a 1-metre increase can materially alter building proportions, increase shading and dominance effects, and contribute to a gradual but tangible shift away from Arrowtown's traditional built character.
- [72] Mr Knott is not concerned with the removal of the existing maximum density rule and reduction of minimum lot dimensions. In his view the associated matters of discretion in combination with the ADG will ensure alignment with Arrowtown's character.
- [73] I respectfully disagree. In the MDRZ, two residential units on a single site are permitted as of right, with restricted discretionary consent only required for three or more units. In my view, the density resulting from two units per site already represents a considerable departure from the established character. This level of intensification does not ensure the maintenance of existing character, particularly given that the MDRZ anticipates and enables multi-unit development.

Mr Wallace

- [74] Mr Wallace prepared a s32 assessment report, as well as evidence to inform council's decision-making process. He noted that as a Tier 2 council the focus in implementing intensification measures is on transport nodes and where housing is required¹¹. He also stated that a previous housing capacity report dating to 2021 confirms that there is more than sufficient capacity to meet the projected demand in all locations¹².
- [75] While he identifies the provision of a diverse range of housing typologies as a vital solution to intensification, an approach that may be valid from

11 QLDC s32 assessment and related attachments including the Urban Design Report prepared by Mr Cam Wallace of Barker & Associates, p.1

12 Ibid, p. 22

an urban design perspective, in the case of Arrowtown, such development is precisely what risks causing significant adverse effects on the town's special character and historic heritage values from a heritage standpoint, particularly if it is not carefully guided by specific planning frameworks, including robust and locally responsive design guidelines.

- [76] He has not taken into account the effects that the 'setting' that surrounds a heritage area has on the values of that heritage area, as I explained above.
- [77] Mr Wallace refers to proposed updated design guidelines¹³ (which will be part of a later plan change or variation) and notes that these will be updated to accommodate the notified provisions for each relevant zone allowing for greater heights, densities, and a range of housing typologies. As noted above, this will result in considerable changes to Arrowtown's existing character (as is acknowledged in the draft guidelines, by noting that it is to reflect the intended character¹⁴), and its sense of place.
- [78] In relation to the issue of rainwater runoff Mr Wallace notes that this is a constraint for intensification, which confirms my argument set out in paragraph 59 above, that there is a risk particularly for older building stock, including scheduled buildings.
- [79] While Mr Wallace uses building heights in relation to numbers of storeys that are commonly used to understand urban design outcomes, from an architectural point of view, realities are often different. 8m plus 1m for a sloping roof provide a massing model that allows to visualise the design of urban settings at around two storeys high; architecturally, taking into account a standard stud height for affordable buildings of 2.4m, and a floor plate of ca 400mm, the buildings can therefore readily include three storeys, in the same way as we see 6.5m high buildings already, that are two storeys high, depending on topography.

13 QLDC s32 assessment and related attachments including the Urban Design Report prepared by Mr Cam Wallace of Barker & Associates, para 9.3

14 Ibid, Appendix 1 k, p.8

Conclusion

- [80] Arrowtown is a heritage town of rare and cohesive character, defined by its modest scale, historic built form, and strong integration with topography and landscape. This character extends beyond the formally protected heritage zones, encompassing the wider township, which acts as both a buffer and a continuation of the town's historic values. Its significance is widely acknowledged and is not comparable to other settlements in the Queenstown Lakes District.
- [81] The PDP, through the UIV, introduces provisions that would significantly increase development potential in areas surrounding Arrowtown's historic core. While it is acknowledged that Ms Bowbyes has recommended lower height limits and some reduction in intensity compared to the notified provisions, the revised framework nonetheless enables development outcomes that would materially change Arrowtown's established character.
- [82] The recommendations in the s42A report, while more restrained than the notified UIV, still allow for bulkier built form, increased height, and greater density than is currently anticipated. In my view, these changes would weaken the integrity of the existing planning framework, undermine the coherence of Arrowtown's built environment, and risk cumulative adverse effects that are inconsistent with the specific objectives and policies for Arrowtown in the PDP itself.
- [83] The reliance on the Arrowtown Design Guidelines, particularly in the context of permitted activities, offers insufficient protection. As currently structured, the guidelines do not apply unless resource consent is triggered, leaving much of the anticipated development outside the scope of meaningful urban design assessment. This exposes the town to gradual but irreversible change, even under the more 'modest' approach now recommended.
- [84] In conclusion, although the recommendations Ms Bowbyes represent an improvement over the notified provisions, they do not go far enough to safeguard Arrowtown's unique character and heritage values. The proposed changes, even in their reduced form, would enable built

outcomes that depart too far from the existing character framework. In my view, a more conservative, site-responsive approach is needed to ensure the long-term protection of what is both a nationally significant heritage environment and a living community

Dated 4 July 2025

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Heike Lutz

APPENDIX 1

CV Heike Lutz

HEIKE BRIGITTE LUTZ

Dipl Ing Arch, M.Arch, PRI

Qualifications and Professional Development

- NZ Certificate, He Papa Tikanga Māori (Te Wananga o Aotearoa)
- Accredited Mediator (LEADR/Resolution Institute)
- Accredited Independent Hearings Commissioner (MfE)
- CoP, Conservation Architecture, (University of Auckland)
- Master of Architecture, University of Applied Sciences (Berlin, Germany)
- Registered Educator, 1st State College for Educators (Berlin, Germany)

- Sustainable Urban Development (Wageningen University / Technical University Delft, NL)
- Environmental Protection and Sustainability (Ben-Gurion University of the Negev, IL)
- Strategic engagement under the RMA (NZ Law Society)
- Comparative Analysis Methodology (ICOMOS NZ)
- Maritime Archaeology: Shipwrecks and Submerged Worlds (University of Southampton, UK)
- Jury X: Deliberations (Harvard University Law School, USA)
- Justice (Harvard University Law School, USA)
- Leading with Effective Communication (Catalyst Inc., USA)
- Communication Skills for Bridging Divides (Catalyst Inc., USA)
- The Science of Everyday Thinking (University of Queensland, Australia)

Relevant memberships and appointments

- Member of Resource Management Law Association (elected member on Auckland and National Committees)
- Accredited Panel Member of LEADR / Resolution Institute
- Member of International Council on Monuments and Sites ICOMOS Aotearoa NZ (former Board Member, 15 years)
- Member of New Zealand Conservators of Cultural Materials (NZCCM)
- Former International Peer Reviewer for World Monuments Fund–WMF (USA)
- Former Chair and Trustee of North Shore Heritage Trust NSHT (North Shore Council Community based organisation)

Knowledge, Skills, and Experience:

Professional

I bring 40 years of expertise in architecture, construction, building conservation, cultural heritage management, urban design, planning, and environmental sustainability. Since 1995, I have successfully led my own businesses in New Zealand and Germany.

In early 2013 I founded BCon Consultants Ltd to focus on my interest in effectively serving client needs regarding resource management matters. I have initially completed the 'Making Good Decisions' course in 2012. I am also a LEADR NZ-accredited professional mediator (2014).

For two decades I have contributed to substantial Plan Changes, full District Plan reviews, and plan development for councils across New Zealand. I have also served as an expert witness for private clients, institutional entities, the Environmental Protection Authority (EPA), and territorial local authorities, recognized for my honesty, integrity, and professional work ethic.

My consultancy work includes in addition to the conservation of buildings, monuments, and vessels, preparing thematic frameworks for district plans, providing statutory and policy advice, crafting heritage guidelines and area management plans, and conducting peer reviews. I have also supported councils with resource and building consent processes on a consultant basis.

As a consultant in the heritage field, I have experience with cultural heritage, including matters relating to tikanga Māori. My work involves understanding cultural values and the relationship of mana whenua to land and water, and assessing cultural significance and developing strategies to protect these values. This expertise informs both my consultancy work and my role as a commissioner, where hearings often incorporate tikanga Māori.

To stay current with legislation and matters of *te Tiriti o Waitangi*, I participate in ongoing professional development through councils and organizations like the Resource Management Law Association (RMLA).

Previously, I co-founded and managed Archifact Ltd (2003-2013), a heritage architectural practice. I have also served as a consultant to the New Zealand Historic Places Trust (now Heritage New Zealand Pouhere Taonga), taught Building Conservation and Design at the University of Auckland (2000), and worked as a Senior Conservation Consultant at Jasmax Limited (2002).

My project portfolio includes nationally and internationally recognised heritage sites such as:

- Old Government House, Auckland;
- Shackleton's Hut, Cape Royds, Antarctica;
- Treaty House, Waitangi;
- Arts Centre of Christchurch, Christchurch;
- The Auckland Hebrew Congregation Synagogue, Community Centre and Kadimah School, Auckland,
- Canterbury Museum, and Christ Church Cathedral, Christchurch.

I have presented peer-reviewed papers and delivered lectures at international conferences and professional events, including:

- *Preservation of Architectural Heritage through Adaptive Reuse and Its Value for a Sustainable Environment (2002)*
- *Conservation versus Restoration: A Story about Layers Over Time (2005)*
- *Community Planning as if Cultural Heritage Matters (2005)*
- *Building Conservation (2022)*
- *What is Heritage—and What It Is Not (2024)*
- *Heritage Impact Assessments – Formats and Toolkits (2025)*

Additionally, I was mentioned in *Making Space – A History of New Zealand Women in Architecture* (Massey University Press, 2022).

Hearings

With over 20 years as an Expert Witness, Independent Hearings Commissioner, and Duty Commissioner, I have been involved in hearings across a wide range of topics, extending from complete District Plan reviews, Plan Changes under the IPI and Schedule 1 processes, resource consent hearings for modest residential applications to the decisions on complex infrastructure upgrades and redevelopments of large parts of Auckland's city centre and the marine environment.

My roles span councils such as Auckland, Christchurch, Hamilton, Palmerston North, Queenstown Lakes, Southland, Tauranga, Wellington, and Whanganui.

I was a panel member to Wellington City Council's Proposed District Plan review, and Plan Change incorporating the MDRS and the NPS:UD, and I am used to travelling regularly for work throughout New Zealand.

I collaborate successfully and constructively with diverse panels, as well as in panels of consistent team members to achieve best outcomes and consistent decision making. I maintain an open-minded and impartial approach, listening carefully, and produce well-reasoned decisions grounded in evidence. My mediation skills further enhance the hearing process.

My hearing experience spreads over various matters primarily relating to architecture and construction, built heritage, cultural heritage including tikanga and te ao Māori, urban design, and environmental sustainability.

The following is a brief selection of hearings:

- District Plan Review for Wellington City Council

Complete review of Proposed District Plan, including Plan Change under the IPI and Schedule 1 processes, involving ten hearing streams, each of

several weeks' length, and wrap up hearings for each process over a two year timeframe.

- 538 Karangahape Road, CBD, Auckland Council

Application for a new high rise commercial development in a Heritage Area and Karangahape Rd Precinct, with three street frontages, and various heights up to 52m, applying high standard environmental principles, and integrating ongoing changes to the existing Unitary Plan.

- All Saints Church, Palmerston North City Council

Repeat-application to alter and enlarge a historic heritage place in the heart of the city, scheduled individually in the PN District Plan. Complex application with extensive community and commercial interest in the city centre, involving religious, cultural, architectural, urban design, heritage, and legal matters.

- Quay Street Seawall Upgrade, Auckland City

Multi-layered series of resource consent applications (4) involving interrelated staged works within a historic area, with considerable impacts and various cumulative effects including effects on traffic, the environment and mana whenua.

APPENDIX 2

Arrowtown

Historic Heritage and Character Impact Assessment

BCon Consultants, 24 June 2025



Arrowtown, Shaw St, view of Brow Peak (BCon Ltd 2025)

ARROWTOWN Historic Heritage and Character Impact Assessment



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24 June 2025

Prepared for:
Friends of Arrowtown Village

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1. Commission

BCon Consultants Ltd. has been commissioned by the Friends of Arrowtown Village to prepare a Historic Heritage and Character Assessment for Arrowtown as the basis for assessing effects of the proposed Queenstown Lakes District Council Plan's Urban Intensification Variation on the heritage values and character of Arrowtown.

2. Brief

The brief for the project requires BCon Consultants Ltd to undertake a professional objective Historic Heritage and Character Assessment of Arrowtown.

The Assessment is vital in understanding the particular historic heritage significance and values and the character of the wider township, and to determine the level of change that can be accommodated in light of the Urban Intensification Variation, without compromising its heritage values or its distinct character.

3. Authorship

This Historic Heritage and Character Assessment was prepared by BCon Consultants Ltd (Heike Lutz, MArch., Dipl.Ing.Arch.) in June 2025.

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4. Methodology

This report provides an objective assessment of the character of Arrowtown, including the area delineated in Section 5.

While the author has longstanding familiarity with Arrowtown through previous visits, a dedicated site inspection was undertaken on 12 May 2025 to inform the preparation of this report, particularly in light of proposed amendments to the District Plan that may affect the township's heritage and character values.

The methodology adopted includes a contextual historical overview of Arrowtown's development, a summary of the architectural continuity, and a brief history of the relevant statutory and planning

frameworks that have shaped the recognition and management of its historic heritage and character to date.

This assessment examines the potential effects of the proposed Urban Intensification Variation on the township's historic heritage values and Arrowtown's character. It considers how such changes may be appropriately managed to ensure that adverse effects on heritage values and streetscape character are avoided, remedied, or mitigated.

5. Identification of the Area

Arrowtown forms part of Queenstown Lake District. The district encompasses an area of approximately 8,720 km², and accommodates a population of nearly 53,000 people.

Arrowtown is a small township about 21 km to the north-east of Queenstown. The boundaries were adjusted in 2023 and it covers now an area of 3.61 km², while previously it was only 2.36 km² in size. The latest Census 2023 puts its population at 2883. However, the population fluctuates, due to many houses being holiday homes, resulting in peak periods.



Arrowtown Township Urban Growth Boundary (QLDC Map Navigator May 2025)

The township within the Urban Growth Boundary (UGB) is approximately L-shaped and roughly bounded to the north and east

by the Arrow River and the hills, whereas to the south by Malaghans Road, and by McDonnell Road to the west.

Expansion areas such as Millbrook that form also part of the wider Arrowtown area have a more rural settings and are physically not connected with the core of Arrowtown.

This assessment focuses predominantly on the areas zoned as Low Density Suburban Residential (LDSR), Medium Density Residential (MDR) and the Arrowtown Residential Heritage Management Zone (ARHMZ).

6. Historical Context

Arrowtown, Kā-Muriwai, one of New Zealand's oldest towns, is widely recognised for its outstanding historic heritage buildings and character. Early on, southern coastal Māori camped in and travelled through the area during seasonal food-gathering journeys and while en route to pounamu sources. Since its establishment during the Otago gold rush in the 1860s, Arrowtown has evolved into a distinctive curated heritage precinct and tourism destination.

Gold Rush Origins (1860s–1880s)

Arrowtown was founded in 1862 as a result of the gold rush along the Arrow River. Gold was first discovered in the Arrow River by Jack Tewa. The settlement was originally known as Fox's named after one of the early the gold diggers, William Fox, who arrived in 1862. It developed rapidly, from tents alongside the river to modest timber and schist buildings erected to serve the influx of European and Chinese miners which counted up to 1500 people at the end of 1862.

The layout was compact, and the architecture vernacular and utilitarian, suited to the frontier conditions. A particularly notable aspect of this early phase is the Chinese settlement along Bush Creek, consisting of small huts and communal spaces, which remains a key part of Arrowtown's multicultural heritage identity.

Decline and Preservation by Neglect (1890s–1950s)

With the decline of gold mining, Arrowtown's population dwindled. The town kept servicing the hard-rock mining at Macetown until about 1916, as well as being a farming service town. In the early 1950s a mere 200 people were living within the town's boundaries.

Many buildings fell into disrepair, but crucially, limited economic development pressure meant few historic structures were replaced. As a result, the original street layout, built form, and scale of the town remains largely intact today. This unintentional preservation laid the foundation for Arrowtown's later heritage significance.

Early Recognition and Community Awareness (1950s–1970s)

In the early 1950s, people—mainly from Dunedin and Invercargill—began purchasing old cottages in Arrowtown as holiday homes (cribs). The government also sold surplus land around the old jail, police house, and courthouse area—known as "the camp"—for holiday use, deeming it no longer necessary. Additional land on Bedford, Criterion, Nairn, Kent, and Stafford Streets was either leased or converted to freehold titles by the Arrowtown Borough Council to accommodate crib development.

Mid-20th-century recognition of Arrowtown's historical value sparked local interest in heritage conservation. While formal planning mechanisms were not yet in place, public appreciation of Arrowtown's historic streetscapes began to influence the town's future path. The town also gained popularity as a domestic tourist destination, with its 19th-century charm contributing to its appeal.

Heritage Revival and Policy Interventions (1970s–1990s)

From the 1970s, more structured efforts were made to restore and protect Arrowtown's historic buildings and its wider character. Conservation of key buildings, such as miners' cottages and shopfronts, was undertaken.

By the early 1970s, demand for sections had grown so significantly that the Adamson subdivision was created from nearby farmland. This brought a new wave of seasonal residents, particularly in summer—and to a lesser extent, winter visitors for ice skating and skiing—bolstering the town's population and supporting new shops, tea rooms, and improved business for the camping ground, pubs, service station, post office, and other local amenities. New shops and a growing population attracted tour buses to the town, drawn by its historic buildings, vibrant main street, and autumn colours—bringing increased visitor activity and boosting the local economy.

Planning instruments began to include heritage-related controls, as well as character maintaining provisions. The Lakes Queenstown Wakatipu Combined Transitional District Plan introduced heritage overlays and character zones, including the Arrowtown Residential

Historic Management Zone and the Arrowtown Town Centre Zone. These provisions aimed to manage the scale, form, and materials of new development within the heritage areas, but also outside, to ensure compatibility throughout the township with the historic context.

Contemporary Heritage and Character Management (2000s–present)

Arrowtown is now one of New Zealand's best-preserved historic towns. Its heritage and distinct character are currently protected through a combination of statutory planning controls, and Arrowtown Design Guidelines, which are now incorporated into the District Plan.

The Proposed District Plan imposes restrictions on height, bulk, and design within identified zones. These zones include the New Town and beyond. The Arrowtown Design Guidelines 2016 (**ADG**) provide detailed guidance on materials, colour schemes, signage, and landscaping. The emphasis is on maintaining the authentic scale and simplicity of the historic and wider townscape while allowing for sensitive contemporary additions.

As a result, the surrounding urban context maintains coherence, and in addition the special topography and visibility of the area in an alpine environment that affords a consistent backdrop of tree lined hills, and mature vegetation that spills throughout the township, are important elements that further enhance the character.

7. Architectural Continuity and Streetscape Character

The character of Arrowtown has evolved significantly over time, shaped by its origins of the 19th-century gold mining settlement, subsequent decline, and eventual preservation and reinvention as a heritage tourism destination.

Its early architecture was utilitarian and vernacular, comprising timber and stone buildings constructed by miners and settlers. Surviving structures from this period include simple cottages, commercial buildings with false fronts, public buildings such as the Masonic Lodge and the Athenaeum Hall, and the Chinese settlement huts along Bush Creek. These early buildings exhibit modest detailing, small footprints, and a close relationship to the natural contours of the landscape.

From the 1960s onwards, growing awareness of the town's heritage value led to conservation efforts. Arrowtown's core was largely spared the post-war suburban expansion that transformed other rural towns, allowing a rare degree of historical continuity. The Arrowtown Historic Zone was later established under the Lakes Queenstown Wakatipu Combined Transitional District Plan to protect its architectural and landscape heritage.

From the late 20th century onward, residential growth occurred primarily beyond the historic core. Arrowtown's growing appeal as a lifestyle, and retirement destination, coupled with domestic and international tourism-driven demand, prompted the development of several residential areas—many of which included modest holiday homes. These small dwellings, built in sympathy with the scale and character of the old town, featured simple forms, single-storey construction, small footprints, and generous sections. Collectively, they established a low-key character that echoed the historic fabric of Arrowtown. It is to note that whilst a tourism town, Arrowtown has little temporary visitor accommodation.

Arrowtown South and Adamson Drive Area was an early expansion zone that introduced low-density suburban housing with conventional timber and plaster-clad homes. While less stylistically coherent than the historic zone, these developments maintain predominantly single detached dwellings, largely single storey, pitched roofs, and generous landscaping that is in keeping with the overarching small town character of Arrowtown.

Butel Park and Cotter Avenue were built in the early 2000s, these subdivisions adopted more regulated design aesthetics, including schist detailing and colour controls, to align better with Arrowtown's broader character.

Essex Avenue and other more recent subdivisions have introduced higher-end housing with contemporary interpretations of local forms. These dwellings often feature larger footprints, open-plan layouts, and expansive glazing, but are still subject to height limits and material controls, which ensures generally a sympathetic outcome for Arrowtown's distinct character, including planting and hard landscaping that integrates the buildings in their context.

Modern development in Arrowtown has been tightly controlled, with design guidelines requiring new buildings to respect the historic core of the town. This has resulted in sympathetic infill architecture,

where new buildings are designed with traditional proportions, gable roof forms, timber or schist cladding, and subdued colour palettes to blend with older structures, and do not dominate.

The expansion to the town periphery created areas like Millbrook, and towards the Golf Course, that have introduced larger-scale residential and resort developments. While architecturally more varied, and not bound by the Arrowtown Design Guidelines, they are considerably separated from the historic core and distinct character of the township, and some have a more rural character.

Increasing demand for property since the end of last century has led to pressure for intensification. However, the District Plan provisions, Arrowtown Design Guidelines 2016, and community efforts have generally succeeded in maintaining a low-rise, low-density character, and methodical design assessments aim to ensure a respectful relationship between old and new.



New building in modern style, yet respecting the key characteristics of its surrounds (scale, simplicity, and density).



Modern 1.5 to 2 storey buildings.



New QLCHT development of affordable rental housing Tawa Banks, one and two storey houses.



QLCHT development of 10 affordable rental houses Suffolk Street.

Arrowtown's streetscape character reflects its origins as a 19th-century gold mining settlement, shaped by an organic and responsive approach to town planning rather than rigid grids. The township features a unique street layout, with narrow lanes, informal road widths, and gently curving alignments that follow topographical contours and historic movement patterns and Arrowtown's circulation network prioritises pedestrian scale and visual interest.

Buckingham Street, the historic main street, forms the town's commercial and civic core. Its human-scaled proportions, historic shopfronts, and pedestrian-friendly character establish a strong sense of place. Residential streets surrounding the town centre display modest lot sizes, simple building forms, and varied front setbacks, reinforcing an informal and vernacular rhythm. It is notable that the only supermarket in town is not located in this area, but within the Adamson development.

Lot sizes within the historic core are generally small and varied, reflecting the ad hoc subdivision patterns of early settlement. This contributes to a denser but low-scale built form with modest dwellings often positioned close to the street or side boundaries, as apparent in the Town Centre. As development moved outward, particularly into areas such as the (ARHMZ), lot sizes remained relatively small but were more regular in shape and presented residential housing types. In contrast, newer areas such as Butel Park and Essex Avenue feature larger lots and more generous setbacks, though they retain elements of local character through materials and landscape treatment.

Mature trees, including avenues of exotic species such as oaks, elms, and sycamores are a defining feature of Arrowtown's public realm. These contribute seasonal colour, shade, and scale, and provide a cohesive visual identity across both public and private spaces. Tree-lined streets, throughout the township, contribute significantly to the amenity and character of Arrowtown and provide for a sense of place.

Open space areas such as the Village Green, the river corridor, and large undeveloped lots within the residential area provide visual relief and reinforce the town's connection with its alpine and rural setting, including its unique location on a terrace. These green spaces also serve as buffers between areas of commercial and residential, and contribute to the township's low-density, open character.

Arrowtown's streetscape character is defined by the interplay of heritage buildings, informal urban structure, established vegetation, and a landscape-responsive pattern of development that prioritises visual coherence and local identity.

Arrowtown has developed in an organic yet coherent and complementary manner, with this giving rise to a character that is incomparable within the district."



Typical view along the road, showing consistent lower height buildings interspersed with extensive landscaping.

8. Effects on Historic Heritage and Character Values

It is acknowledged that the Urban Intensification Variation does not apply to Arrowtown's Old Town, which is zoned Residential Arrowtown Historic Management Zone, nor to the Historic Commercial Precinct and the Arrowtown Town Centre. These areas retain current height limits of 5 metres and 7 metres respectively.

Intensification in the form of increased height and density (and associated rule changes) is proposed in two areas. The first is the Medium Density Residential (MDR) zone immediately south of the Old Town—commonly referred to as New Town—bounded approximately by Kent Street, Suffolk Street, and Ford Street to the north, and by Fox's Terrace and Preston Drive to the south. The second area, located further south, is zoned Lower Density Suburban Residential (LDSR).

Currently, under the Proposed District Plan (PDP) the (LDRZ) sets height limits of 6 metres for sloping sites and 6.5 metres for flat sites. The proposed changes would permit building heights of up to 9 metres (8 metres plus 1 metre for pitched roofs) in the Medium Density Residential (MDR) zone. Up to 8 metres in the Lower Density Suburban Residential (LDSR) zone, regardless of topography (6.5m are proposed as a permitted activity, up to 8m as restricted discretionary, and over 8m as non-complying). In addition, the MDR zone would see the removal of existing density standards, which currently require a minimum lot size of 650 m² and restrict development to one dwelling per site.

The PDP has recession planes applied uniformly to all buildings in Arrowtown, regardless of the site's topography or orientation at 2.5m with a 35° angle, except street frontages and adjoining a reserve. The PDP in contrast is specifying that recession planes are only required on boundaries with neighbouring sites but not along road frontages or where the site adjoins the Town Centre Zone, Business Mixed Use zone, or a park or reserve. A more restricted recession plane applies to southern boundaries to allow more sunlight access.

The recession planes are measured from 2.5m height with an angle of 35° for all boundaries (with the above exceptions) in the ARHMZ, and the southern boundaries in the MDRZ and the LDSR. Eastern and western boundaries in both zones have an angle of 45°, and northern boundaries 55°.

Recession planes are a critical tool in protecting the town's spatial character, amenity, and heritage values. Weakening these provisions as proposed and particularly in combination with greater height risks irreversible change to Arrowtown's valued identity and character, in addition to adverse effects on open space, privacy, sunlight access and amenity values for adjacent properties.

In addition to visual and amenity impacts, it is particularly important for older timber-framed buildings—often constructed without modern building membranes and using moisture-sensitive traditional materials—to retain adequate sun exposure. Regular sunlight assists in the natural evaporation of moisture and helps building materials to dry out. Reducing solar access and ventilation alters the building's existing physical performance and may compromise its condition over time.

While intensification is typically directed toward areas close to commercial centres, public transport nodes, and community infrastructure, this rationale is primarily relevant to large urban centres, where city cores such as Auckland and Christchurch are expansive and 'walkable catchments' extend to a radius of about 1.2 kms or a 15 minute walk.

Arrowtown does not function in this way. As a small township within the UGB, even the most distant residential streets—such as e.g. Advance Terrace—are located within approximately 1.5 kilometres, or a 20-minute walk, from the town centre. The entire township already operates within a 'walkable catchment', making

conventional urban intensification logic not applicable in this context.

The township is serviced by one small Four Square supermarket, that seems to have grown from a corner dairy, and which is located outside the main shopping area. The main shopping area along Buckingham Street, while providing for cafes and restaurants, is otherwise focussing on souvenir and visitor trades. The only medical centre in Arrowtown is planned to be closed. While the only primary school in town has a capacity of 540 students, it is in the process to be slightly increased to 700 students to accommodate the current pressure. Arrowtown does not have a secondary school.

Applying standards designed for major cities with populations between 400,000 and 1.5 million, and land areas spanning hundreds of km², to a township of just 2,800 residents on 3.61 km² will result in significant adverse effects on many levels, but most prominently its heritage values and distinct character.

Arrowtown's distinct character is not synonymous with the heritage character of the Old Town. While the wider residential area draws on the attributes of the historic core, these characteristics have been adapted to accommodate modern residences that sit comfortably alongside older buildings and within the broader township. Arrowtown's wider character, outside the ARHMZ, can be compared with the setting of a single heritage building, and its extent of place.

The Arrowtown Design Guidelines 2016 have generally supported managed growth over time without compromising the town's identity as a small-scale, low-density New Zealand settlement. This has resulted in a relatively high degree of consistency in form, massing, and materiality, complemented by established landscaping, including pocket parks that are aligned to provide easy walkable thoroughfares across the township.

Maintaining the established character, or planned character enabled under the existing PDP rules, particularly in areas adjacent to the ARHMZ, is essential to protecting the heritage values within it. The backdrop to the ARHMZ contributes significantly to the understanding and appreciation of both the zone as a whole and individual heritage buildings within their wider setting. The proposed 9metre building height south of Kent Street, Suffolk Street, and Ford Street would substantially alter the character of these streets, creating a stark contrast where one side retains its heritage status

and the other is zoned Medium Density Residential. The proposed 9 metre height would accommodate

three storey buildings on the southern sides of these streets, and would undoubtedly create a blunt visual dominance. While such a planning approach may be appropriate in large urban centres with wide streets and much greater separation, it is not suitable in the compact and contextually sensitive setting of Arrowtown.

While the Arrowtown Design Guidelines are intended to support development that positively contributes to the town's character, their effectiveness is limited in practice, particularly where greater building heights are permitted. They do not reliably achieve key urban design outcomes when applied within a Restricted Discretionary framework. The more enabling zoning provisions further undermine consistency of character, especially as new buildings increasingly approach height and coverage thresholds already allowed under the PDP. This is compounded by the simultaneous relaxation of built form controls and substantial increases in permitted heights—an approach that appears fundamentally inconsistent with the objective of maintaining and enhancing Arrowtown's established character.

If greater building heights are considered necessary, they should be located further away from the ARHMZ to create an appropriate buffer that enables a transition from the low-scale 5-metre height limit to the significantly increased 9 metres proposed. However, in the context of Arrowtown, any height exceeding two storeys is likely to have adverse effects on the township's character.

The height and massing of a building significantly influence the visual character and function of a street or neighbourhood. It is equally important that developments on sites adjoining the ARHMZ contribute positively to the character of that zone and of Arrowtown more broadly, to avoid any adverse effects on these established qualities.

The requirement to not be 'out of scale' cannot be achieved where 9 metre height is proposed, being almost two times as high than the average Arrowtown building that form the overall character of the township. However, a maximum of two storeys could potentially allow for growth, as well as a variety of housing types, if well designed and executed, and in accordance with the ADG 2016, without having the level of adverse effects that a 9 metre (three storey) MDR zone will have. This has already been proven at a number of properties that have gone through urban design assessment in light of the

ADG 2016. As can also be seen with the examples of the QLRHT housing, development does not need to be three storeys high to achieve moderate growth.

There may be an opportunity to increase height in some areas, e.g. the area of Butel Park may accommodate greater height, due to its topography and its secluded location. There are also areas outside of the UGB, that are on the public transport route that could be considered, that may have the same distance to the town centre and the supermarket, but are located away from the core to the south-west.

The distinctiveness of Arrowtown lies not only in its heritage origins but also in the consistency of scale, the integration of mature vegetation across both historic and newer areas (within the UGB), and the open views to the surrounding hills from nearly every part of the town. These qualities are fundamental to Arrowtown's character and contribute to its enduring appeal for both residents and visitors.

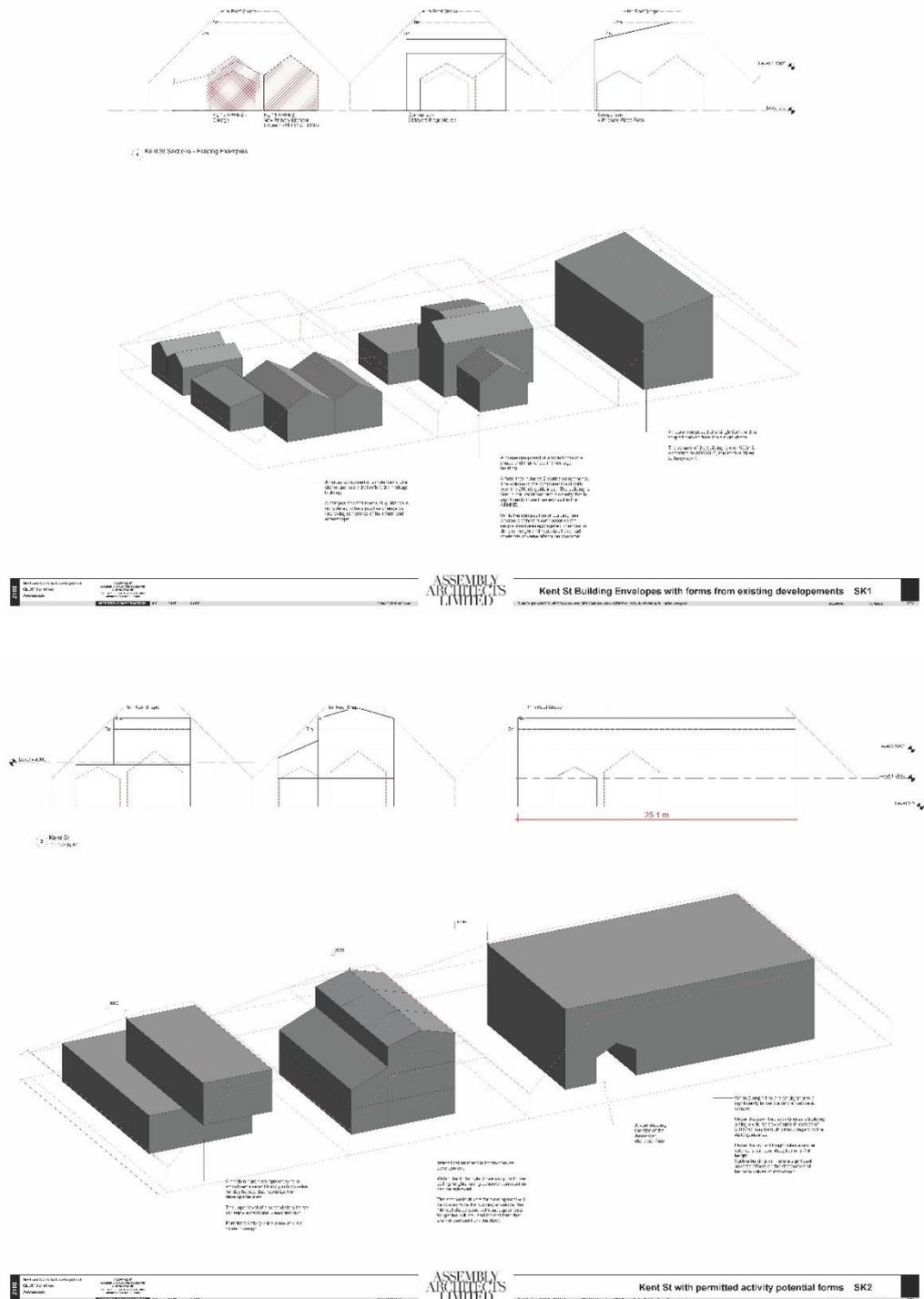
Impacts of the changes proposed on the LDSR character will include taller buildings that will increase visual dominance on sites, particularly when recession planes are also relaxed on east and west boundaries. This shifts the character from low-rise, detached dwellings to potentially more bulky and prominent structures.

Greater site coverage and reduced setbacks will lead to reduced garden areas, less visual permeability between buildings, and less opportunity for mature planting. This alters the open, green, and low-density character typical of Arrowtown's peripheral areas.

The recession plane change allows more height near east and west boundaries, creating a heavier, and visually denser streetscape. This also increases shading impacts and visually alters the traditional, varied roofline character.

The LDR zone has historically supported generous lot sizes and varied dwelling placements. The LDSR zone introduces a more uniform, urbanised pattern of development with more consistent setbacks, house-to-boundary ratios, and potentially repeating typologies (e.g. duplexes). Areas adjacent to the ARHMZ currently act as a buffer, with compatible scale and form. The LDSR zoning enables a level of intensification that may disrupt this transition and undermine the coherent edge to the historic core.

The following height schematic diagrams, using Kent St as an example and prepared by Assembly Architects, show the impact a 9 metre development in the MDR zone could have on the character of Arrowtown.



Even though elements of the character of the existing buildings (historic and modern) were adopted in these schematics, such as

gabled roofs and simple forms, it is obvious that the bulk and scale is overly dominant, it completely changes the character and cannot be considered as sympathetic or fitting within the Arrowtown character context.

While Arrowtown has a distinct identity, few other townships in New Zealand exhibit a comparable character and historic origins—though not necessarily a comparable course. Akaroa, Coromandel Township, Thames, and Greytown share several similarities with Arrowtown. Although Akaroa and Thames differ in scale and context (Akaroa has only around 800 permanent residents, while Thames has a population of approximately 7,000, and both have a maritime context), they all face similar growth pressures, alongside the imperative to maintain their distinct character.

Christchurch City Council has responded to the NPS-UD by excluding Akaroa, although falling under Christchurch City Council's jurisdiction, as a 'relevant residential zone', which is defined as urban environments with populations of at least 10,000 people. Akaroa is recognised for its rich heritage and consistent character, including more modern developments that are sympathetic, and is not proposed for intensification for that reason. There are also no intensification plans for Coromandel Township.

Greytown is undergoing a review to accommodate population growth, however, the heritage and character zones have been excluded from intensification. In addition, provisions outside the heritage and character zones are providing for a buffer zone that has been introduced to achieve a transition between heritage, character, and intensification. Any development within and adjacent to heritage and character zones is subject to lower heights, and Design Guidelines aimed at maintaining the town's heritage and streetscape character.

Housing pressure in Arrowtown has been evident since the late 20th century and is not a recent phenomenon. In response, new dwellings have been constructed and additional development areas opened over time as described above.

The drivers of this growth are largely tied to Arrowtown's appeal as a retirement or holiday destination for affluent buyers, its proximity to Queenstown, its heritage tourism value, and its seasonal sporting attractions.

Tourism has played a pivotal role in Arrowtown's economic revitalisation, but it has also placed increasing pressure on its heritage fabric. The commodification of heritage has led to high visitor numbers and seasonal crowding, highlighting the township's limited capacity to absorb significantly more people on a permanent basis. Sustained population growth risks undermining the very qualities—heritage, character, scale, and amenity—that attract both visitors and residents to Arrowtown.

In addition, and maybe more so than in other areas of the country, due to the topography and climate of the location, infrastructure deficits—particularly the absence of a stormwater system—pose risks to all of Arrowtown, but especially to heritage areas. These areas have limited capacity within their traditional swale systems to accommodate increased runoff from less permeable surfaces, raising the potential for stormwater overflow and flooding.

10. Conclusion:

Arrowtown's unique character, shaped by its heritage fabric, modest scale, and natural setting, is the product of careful stewardship and community commitment over decades. While the Urban Intensification Variation excludes the Old Town, the proposed increases in height and density immediately adjacent to the ARHMZ—particularly in the Medium Density Residential zone—threaten to compromise the integrity of the wider township. The proposed 12-metre height limit in the MDR zone represents a scale and intensity fundamentally at odds with the established built form, undermining both the heritage values of the adjacent ARHMZ and the broader character of Arrowtown.

The proposed LDSR changes will increase building height and bulk, reduce green space and openness, and introduce a more uniform, urbanised form. This is eroding the low-density, landscaped character of Arrowtown's edges and weakens the transition to its historic core.

Unlike larger urban centres, Arrowtown functions as a compact, walkable township where conventional intensification rationales—such as proximity to public transport and commercial services—do not necessarily apply. Comparative examples from Akaroa, Greytown, Coromandel Township, and Thames demonstrate that similar settlements with strong heritage values have either been

excluded from intensification altogether or provided with buffer zones and stricter design controls to mitigate impacts.

The adverse effects on townscape character, heritage setting, infrastructure capacity, and overall amenity are clear and significant. A more nuanced approach is required—one that allows for sensitive, small-scale intensification in appropriate areas, such as Butel Park or locations outside the Urban Growth Boundary, while reinforcing the importance of scale, vegetation, and setting as defining attributes of Arrowtown's identity. Future planning must ensure that the qualities which make Arrowtown so valued by both residents and visitors are not irreversibly eroded in the pursuit of poorly contextualised growth.

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Personal conversations with David Clarke, former director of Lakes District Museum.