



FORM 5: SUBMISSION

ON NOTIFIED PROPOSED DISTRICT PLAN OR PLAN CHANGE OR VARIATION OR POLICY STATEMENT



Clause 6 of Schedule 1, Resource Management Act 1991



TO // Queenstown Lakes District Council

Name of submitter // Anna-Maree Chin Architects Ltd

This is a submission on the following proposed policy statement (or on the following proposed plan or on a change proposed to the following policy statement or plan or on the following proposed variation to a proposed policy statement or on the following proposed variation to a proposed plan or on the following proposed variation to a change to an existing policy statement or plan) (the **proposal**):



NAME OF // Proposed or existing policy statement or plan and (where applicable) change or variation

I could / could not**

gain an advantage in trade competition through this submission.

*I am / am not**

directly affected by an effect of the subject matter of the submission:

(a) adversely affects the environment; and

(b) does not relate to trade competition or the effects of trade competition.

* Delete entire paragraph if you could not gain an advantage in trade competition through this submission.

** Select one.



SPECIFIC PROVISIONS // Of the proposal that my submission relates to are:

We submit against the proposed Urban Intensification Variation in its entirety



MY SUBMISSION

(include whether you support or oppose the specific provisions or wish to have them amended, and reasons for your view)

refer to attached written submission
Anna-Maree Chin Architects Ltd - submission re the
proposed Urban Intensification Variation
4 Oct 2023

*If your submission relates to a proposed policy statement or plan prepared or changed using the collaborative planning process, you must indicate the following:

- whether you consider that the proposed plan or policy statement or change fails to give effect to a consensus position and therefore how it should be modified; or
- in the case that your submission addresses a point on which the collaborative group did not reach a consensus position, how that provision in the plan or policy statement should be modified.

* This paragraph may be deleted if the proposal is not subject to a collaborative planning process.

I SEEK THE FOLLOWING DECISION // From the local authority

[give precise details]

that the ~~variation~~ variation be retracted / removed in its entirety

*I wish / do not wish** to be heard in support of my submission.

I will / will not** consider presenting a joint case with others presenting similar submissions.

* In the case of a submission made on a proposed planning instrument that is subject to a streamlined planning process, you need only indicate whether you wish to be heard if the direction specifies that a hearing will be held.
** Select one.

SIGNATURE

**Signature

[or person authorised to sign on behalf of submitter]

on behalf of Anna-Nane Chin Architects Ltd

Date

5 October 2023

** A signature is not required if you make your submission by electronic means.

YOUR DETAILS // Our preferred methods of corresponding with you are by email and phone.

Electronic address for service of submitter [email]

Telephone [03 409 8881]

[home]

[mobile]

Postal Address PO BOX 253
[or alternative method of service under section 352 of the Act]
Awarua

Post code

9302

Contact person [name and designation, if applicable]

NOTE // To person making submission

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.

Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least 1 of the following applies to the submission (or part of the submission):

- > it is frivolous or vexatious;
> it discloses no reasonable or relevant case;
> it would be an abuse of the hearing process to allow the submission (or the part) to be taken further;
> it contains offensive language;
> it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.



ANNA-MARIE CHIN ARCHITECTS LTD – SUBMISSION RE THE PROPOSED URBAN INTENSIFICATION VARIATION

4 October 2023

We submit against the Proposed Urban Intensification Variation in its entirety.

We are also submitting on behalf of many of our clients who are directly effected by this proposed variation who live in or around Arrowtown.

We question the process that has been undertaken by QLDC that has led to this notification.

This variation has been lumped on all the communities with total lack of community consultation or any engagement with the professionals within these communities.

Within the NPS-UD it was only Queenstown that was originally identified as being of consideration, but QLDC has decided on its own to include the other areas.

The NPS-UD also does not include or require towns that are less than a population of 5000 people to be included for assessment in this policy, therefore this precludes Arrowtown and Lake Hawea. Therefore they are outside of the requirements of the NPS-UD and should not be included.

Therefore we believe the variation is not in accordance with the NPS-UD and should be removed.

As architects we consider analysis the impacts of any design against both the site and the neighbouring properties. In consideration of the rules and guidelines provided through the District plan and Arrowtown Design Guidelines 2016, we recognize have been implemented to maintain the ensure the ongoing built and greenspace outcomes for now and into the future.

There appears to be a total lack of understanding by QLDC or a robust analysis of what this variation might mean to these communities. The QLDC submission information provided did not show how these proposed changes might be interpreted to give support to QLDCs decision to include them. So how did they come to conclusion that this variation is acceptable?

To be able to understand the implications of these variations a bulk and form analysis had to be undertaken, to show sun shading effects, dominance, relationships to neighbours. This has been done independently by professionals as part of the community to inform the community of the effect or outcomes and it is very clear that the results show a very real negative impact on the town. The community has come together to get a real understanding of the implications and effects of these variations so the concerns that we have are not adhoc but based on real issues and analysis. This should have been undertaken by QLDC and at this point they should have rejected the variation as been applicable.

The variations proposed for the communities are not based around good urban design principles or in line with the resource management planning principles.

The resulting type of development as an outcome from this variation is completely against the small scale, rural town aesthetic that is Arrowtown, Wanaka and Lake Hawea. Arrowtown in particular being recognized as a beautiful tourist town with an unique character. If this variation were to be

implemented this would change Arrowtown for ever and this character would be lost. The value to both the community and to the ongoing tourist industry would be diminished.

For the planner to make comments that this “new area” of Arrowtown is not particular to Arrowtown is incorrect. This does not feel like someone who has been to the area and seen how this variation would impact the town. How the old and new towns relate to each other but reflect differing eras of time and growth.

If one looks from the hills above Arrowtown one can see that the existing built form, scale and density of built form interspersed with trees and greenspace has made this part of the whole of Arrowtown. There has been careful planning and consideration of green space linking the old and the new sections of Arrowtown, of links between that assist in creating the small urban scale town. Where people can link and meander without being on a road.

This proposed intensification will undermine these areas, creating shade, creating less safe spaces between buildings. Removing the green spaces and trees as the buildings will be more prominent.

This variation is completely contrary to all the work that has been undertaken over many many years that has accumulated into a formal document the Arrowtown Design Guidelines 2016 and more recently the Queenstown Lakes Spatial Plan 2021. These have been through robust and exhaustive reviews, to provide for ongoing development in Arrowtown. These changes are contrary to the District plan requirements relating to development in all these communities.

Arrowtown has not been stagnant in this area of intensification but has allowed growth at a scale that works with the town but providing what the policy statement is trying to do which is housing at an affordable scale. Which is also achievable to build and affordable.

The possible outcomes that can be generated by the variation will have significant adverse effects on the character of Arrowtown.

The changes have not taken into account the climate and the daylight hours. There is real concern about sunshading to neighbours in particular winter when Arrowtown has limited sun hours there by exacerbating the requirements for building for heating, insulation.

The loss of privacy. The domination of built form on the neighbours.

The loss of outdoor green space. Not all plants grow in shady cold, dark environments. Buildings being dominant as there is not enough open space to provide outside amenity.

The changes will reduce sunshine into buildings.

There will be a loss of views. Both on site and also from roads which at present you can see the mountains in the distance. Dominance of built form that screens the mountains and skylines that are the environment we live in.

There is not adequate infrastructure in place to be able to cater for the development proposed by this variation.

By changing the rules this does not mean that the outcome will be as intended by the NPS-UD, it does not mean that there will be more housing. These changes to rules allow for large scale houses as well.

The scale of the variation is of an urban scale, city scale. Arrowtown, Wanaka and Lake Hawea are small rural towns not urban centres. These cater for people, communities, and neighbours. They are about people, their interaction with each other, kids on bikes, providing for amenity.

We believe that intensification at this scale is best to happen in new greenfield sites where they can better be designed to include for greens space, infrastructure, relationships to other buildings. And sensitively deal with sun shading, privacy and allowing green space areas to mitigate built structures. Not in existing areas where there has been well discussed and analyzed urban design to create a town that works for the people. Through robust council and community involvement.

We want the Proposed Urban Intensification Variation retracted in its entirety.