

Tena Koutou Katoa

- I have called Arrowtown home since 1989 when I started working in the town, although I moved to the district in 1985. I live at 47 Adamson Drive Arrowtown, and there is the potential that I will be seriously affected by the intensification proposed in both the MDRZ and the LDRZ. I could potentially lose views, sun and the 'special character' I currently enjoy. I love living where I do. That's my personal residential situation, but I also speak as someone who has a deep, long attachment to the town, along with so many of the other submitters. I have holidayed in Arrowtown since the early 1960s, enjoying its amazing sense of history, place, ambience and character. It is one of New Zealand's gems and QLDC and Central Government should be doing everything to protect it (especially given their greater tourism push). In fact, it seems incongruous that after Arrowtown was named for the second time, as the most beautiful town in NZ, much of the town is identified as being suitable for urban intensification to a level that would change considerably the character and social dynamics of our amazing town and community forever.
- I wish to oppose the Urban Intensification Variation (UIV) in its entirety for a number of reasons and seek that the status quo remain. (i.e. the existing MDRZ and LDRZ as introduced in the District Plan (DP) review in 2016/2017. I also reject the recommended changes outlined in Council's S42A reports. While these reports and resulting recommendations make a poorly conceived variation perhaps more acceptable and make the case for Arrowtown's 'special character', they do not mitigate my concerns around the considerable adverse effects resulting from overlaying large parts of a functioning town with multi storey intensive development. The outcomes sought by the Arrowtown Design Guidelines 2016 that seek to guide development in Arrowtown, are simply not achieved.
- The introduction of the MDRZ and LDRZ in 2016 and the provisions around these zones allow 2 stories now. When these zones were established it was expected by the community that any new development in these zones would be assessed against the ADG. Indicative drawings, objectives and policies were produced to show how development could take place in these new zones that reflected the 'old town'. However, in several cases recently this has simply not occurred. If a development has adhered to the site and zone standards they have not been assessed against the provisions of the ADG. The result has been new houses that have no reference or relevance to the 'old town' and certainly no reference to the ADG. This is extremely disappointing considering what was expected.
- We have a large degree of 'cultural cringe' in New Zealand, especially when it comes to protection of special character and built heritage. Buildings worthy of protection are deemed as not being 'old' when compared to Europe, so they are knocked down instead of being repaired and repurposed. 'Special character' is not deemed 'special' because it might appear as 'anti-development'. If you object you are labelled as NIMBIES or told Arrowtown must 'do your bit' to allow for growth, or you are asked why Arrowtowners think they are so special. (I've had all three of those labels thrown at me) I have been lucky enough to travel widely and have seen how small character villages are revered in places like the UK and throughout Europe. It's because they are 'special'. Not so much here apparently and that's coming from someone who has spent all my professional working life working for heritage protection.

- It is frustrating to me that after 37+ years of Arrowtown community involvement in the planning process, working on and with council, a process that has helped to guide how the community wants the town to feel and look like, we are still fighting these planning battles. It has been like Whack-a-Mole. We get consensus with community and council working in the same direction and then new regimes (local and national) come in, new staff that do not know of the planning history are employed and new developers continue to push the envelope. Its apparently called 'growth' and we are told we must live with it. It's a 'build and they will come' mentality. It is of course very tiring for the residents who on a numerous occasions, have had to fund any opposition campaigns out of their own pockets.
- We all accept that change is inevitable, but change is not acceptable however, if that change has adverse effects that far exceed the benefits. This is the situation we now find ourselves in, with the UIV being applied to Arrowtown without little prior discussion, or with the consensus of the community. Hence the overwhelming number of submissions against it.
- While it is accepted that at its core, this is a Central Government directive, Arrowtown could have been excluded by QLDC from the variation based on its heritage and 'special character' status. QLDC had this option but chose not to exercise it. We were told that it had to be accepted. The S42A reports could also have rejected it in its entirety based on the overwhelming opposition.
- To condemn a large tract of Arrowtown residential area to a level of urban intensification that is contrary to the community's aspirations or desires, and contrary to the Arrowtown Design Guidelines 2016(ADG) and the Proposed District Plan (PDP) is ill conceived. This is predicated largely on the belief that there needs to be more affordability, more housing typographies' and built where there is public transport connectivity and businesses that apparently can support intensification. (presently a couple of buses and a small 4 square shop that has no ability to expand). It is a one size fits all sledgehammer approach with little consideration for the receiving environment.
- In the reports accompanying the UIV, I found the Urban Designer dismissive in terms of the amenity of the Adamson Drive subdivision and the other areas covered by this zoning. He said: ***While some people may have the view that the existing patterns of development in the New Town area of Arrowtown may have value for functional or aesthetic reasons, it is difficult to suggest that these are particularly unique to Arrowtown or of the district more broadly. This type of development is likely to be reflective of development trends and feasibility of the time rather than a specific desire to retain the character of Arrowtown.*** That may be his professional view, but it is made without any knowledge of the community or the amenity that all parts of Arrowtown provide. He appears to not have paid any attention to the council led community planning workshops held in 1994, 2003, 2016 and 2022. All these workshops reinforced why people lived in Arrowtown, its special characteristics and what people wanted to see retained. Arrowtown being labelled as a heritage town with special character, is not just about the old area of town or even just buildings. What constitutes urban heritage and special character? It doesn't have to be assessed on the number of actual Victorian/Edwardian building and established sentinel trees. It can simply be the layers of habitation. The Adamson Drive 'cribs' with their intergenerational family connections for instance. The houses can be ordinary and utilitarian but still have great significance to the residents. It can just be that sense of nostalgia that occurs over many generations and should not be dismissed lightly by a report that is devoid of any public consultation. If you asked the

residents in Arrowtown's new town about what they cherished, they would likely say it is 'a very satisfying and pleasant place to live'. Recently I talked to Taylor Reed, now 95, who was an Arrowtown Borough Councillor and former planning chair of Arrowtown, when the Adamson subdivision was master planned. He said it was well planned and thought out. It provided generous streets, parking and pocket parks that all linked through to the Recreation Ground so people could walk and cycle. Single storey development was to protect views, 'overlooking', and sun and there was to be lot sizes that allowed for good gardens, especially vegetable gardens. This was complemented by generous street planting. Low key infrastructure like gravel paths and swales brought elements from the old town into the new. This was the 1970s remember! Pretty enlightened and still working well 50 years later.

- It is accepted that the S42A reports have made recommendations to the Commission that reduce heights and seek certain recession planes, but these heights, reduced section sizes and zone standards would still have significant impacts without solving the issues like affordability and mixed typography. No evidence has been provided that the UIV will lead to affordability.
- All it will lead to I suggest, is more and larger 2 storey houses (which are already permitted now in the MDRZ) and expensive apartment blocks, no doubt in many cases bought and rented out on Air BnB. The reports still pay little attention to the receiving environment and what we see happening in this district due to the gains to be made in property speculation. Titles could be amalgamated and apartment blocks built, having adverse effects in terms of existing amenity, i.e. low rise providing outstanding views up to the hills and mountains, gardens, trees and sunlight. What are the effects on traffic, services including drinking water, stormwater, firefighting water, sewage, electrical supply, telecommunication, parking, road widths, kerb and channel and traffic control, footpaths, street trees, air quality and the fact that on any given day of the year the CBD is completely full of vehicles and people. Many of the infrastructure services needed to supply this level of intensification, simply do not exist in the new town of Arrowtown. How is it proposed to retrofit and pay for this infrastructure? When would an upgrade infrastructure be required if this zoning is granted and how would this be triggered? I am not an expert on infrastructure, but I have been involved in Arrowtown planning long enough to know there are serious issues around infrastructure, and they are not addressed in the S42A report on infrastructure, which is light on detail. There is a suggestion that the zoning changes comes first but if there isn't infrastructure capacity, then the developer will have to retrofit the services that can't be supplied. The S42A report largely dismisses the infrastructure concerns in the public submissions.
- So, let's look at this. We know from observation and experience that water pressure can be low at certain times of the year, especially if it is a dry summer (the reservoir capacity and pumping does not match the take). Is it realistic that developers will be required to build a new bore and reservoir? Swales in most parts of Arrowtown take water from the roads and water the street trees. A very simple and environmentally effective system. I anticipate the street trees will be sacrificed for the demand for street parking and the swales will eventually be replaced with kerb and channel losing the appeal of our low-key infrastructure which so many submitters appreciate. This would require reticulated road storm water. There is kerb and channel in a few places now but the mud tanks that service them are often overwhelmed in heavy rain. More intensive development means more roofs and more hard surfaces, which apparently will continue to be handled by onsite soak pits, although we are told any reticulated stormwater will head to the Arrow River. This would result in more chemical and diesel run off into the river. If there is no wastewater capacity at the

Shotover oxidation ponds, especially considering plans for huge intensive development on the Ladies Mile, or no capacity in the Arrowtown to Shotover pipeline, then once again it would apparently be the developer's problem. How would any upgrade be achieved and how would it be triggered? Has this even been modelled for Arrowtown based on the proposed intensification?

- Views, sunlight and 'overlooking' apparently don't seem to matter in terms of amenity. We are told they are either not protected in the RMA or DP or can be managed to some degree by recession planes. We are also told in the Urban Design report that people's perception of amenity evolves over time including access to sun. So, one generations 5 hours of sun mid-winter becomes no sun for numerous days for the next generation? Residents know that sunlight is critical for well-being and mental health when you live in one of the coldest towns in New Zealand. Less sun will result in more domestic fires. We have some of the worst air quality of any small town in NZ now!
What about vehicle use and parking. Its problematic now. Intensification will be matched by more vehicles. We are told people will get the bus or bike. The intentions are good, but I suggest it won't happen.
- Arrowtown is not a typical town of 2800 people, and it is certainly not a suburb of Queenstown. On any given day in the busy season, because we are a visitor destination first and foremost, the town can double or treble in size. Tourism, like it or not, is our main economic driver and Arrowtown is a leader. Visitors get turned off very quickly however, when they can't park or are forced off the footpath. Their experience is diminished. On many summer days, we are at that 'uncomfortable' point, where we are being overrun. Can the CBD and the heritage fabric that exists there now, cope with a significant population increase as well as further tourism growth?
- What is the potential devastation and social upheaval resulting in the loss of amenity for existing residents who loose sun and light, neighbourhood and community? I would like to know what population numbers council sees for Arrowtown? When is the town considered full? Has this been modelled beside the infrastructure capacity if the proposed zoning is used to its maximum potential?
- What are the examples, positive or negative, nationally or internationally of what has resultted from a similar infill density on existing urban fabric of similar site sizes, to give the community an understanding of what the implementation will look like. Council needed to pre consult on a variation that proposes such significant adverse effects. All we got was a short very unsuccessful public meeting.
- The principle aim of the UIV is to provide affordable housing and varied housing typographies in Arrowtown and in other urban areas. It is accepted the issue of home affordability in the Queenstown Lakes District is critical, as it is with almost every desirable tourism area around the world. The Queenstown Community Lakes Housing Trust (QCLHT) has done fantastic work but cannot hope to meet the demands for affordable housing in the district without additional tools being made available. The governments idea is that the UIV will flood the market with houses, and this will drive prices down. No evidence has been provided if this would occur. Everyone I have spoken to in the local development, legal and real estate world, tells me 'Affordability' will not result from what is proposed in the variation as it relates to Arrowtown. Yes, we might get different housing choices, from standalone houses on smaller lots, to apartments, to multimillion dollar penthouses, but it is very unlikely that any of this would be affordable. Demand will continue to drive prices as will the

necessity to provide infrastructure, so any affordability would not result. Any new developments in the LDRZ and MDRZ is likely to be bought by out of town or overseas buyers, leading potentially to empty Airbnb 'ghost houses' which is already an issue in Arrowtown. Existing owners in the LDRZ may simply choose to build a second storey up to 8 metres and creating a bigger house with no supply gain.

- What is the cost for example of a 2-storey apartment on MDRZ infill land compared to a new dwelling with a residential flat in a new subdivision? Would the cost of the Arrowtown property, demolishing a perfectly good dwelling and the environmental implications of taking the debris to the landfill, and then the cost of a new building, make this affordable to anyone except wealthy NZ or overseas buyers? The only way affordable houses can be constructed in this district is through the models adopted by the (QCLHT) i.e. inclusionary housing- land set aside in new developments for more affordable housing, or on land given to the housing trust by QLDC at no cost, or implementation of a development levy. Queenstown's sister city of Aspen in the US grapples with affordability but has provided 3000 affordable homes through various development levies and transfer taxes and they have provided world class public transport to allow people from satellite towns to commute to work in Aspen. It is accepted QLDC has sought to implement policies like inclusionary zoning, but we don't have a Capital Gains Tax in New Zealand, which is a huge handbrake on affordability as property investment and speculation further add to affordability.
- As stated above, we know the UIV is not just about affordability, but also about supply of houses. The QLDC Housing Development Capacity Studies and Spatial Plan, shows we have more than enough land zoned to cater for housing capacity in the district until 2051. The limitation to increased housing is not land supply, but the cost of construction and the installation of infrastructure. Why inflict this variation on Arrowtown where there is also limited infrastructure. Infrastructure surely must come first or be assessed as readily available. We are seeing the results of rapid growth with insufficient infrastructure to match it, in the district's 3 waters situation and unsustainable traffic gridlocks that will only get worse.
- This level of multistorey development proposed can in my view only occur successfully on greenfield sites where they can be well planned and have good results. If QLDC wanted to go 'up and out' like the UIV seeks, why are single storey new houses being built in new LDR zones at places like Jacks Point, Hanley's Farm and Homestead Bay, while it is being proposed to intensify existing established suburbs and potentially pull existing houses down? These green field subdivisions could have had multi storey apartment units that could have been developed from scratch with views and sun considerations, green spaces, playgrounds, public transport, cycleways, etc. One successful example I have found in terms of this level of intensification is Hobsonville Point in Auckland, which is a master planned community This has a general height limit of 10-12metres, wider streets, parking consideration and is a greenfield site. It has planting space around the houses, mainly confined to street planting, but because it is a greenfield development, pocket parks have been created for the residents to enjoy. Good Urban design in my view starts with the housing unit typologies. Buildings can be laid out for sun views, privacy, public space and road networks designed around the buildings. This design led approach results in high quality functional urban areas something that the intensification of an existing functioning town would not achieve.
- In terms of guiding documents, I consider that the proposal is contrary to the intent of the ADG 2016 which are statutory documents designed in consultation with the community over many years. The proposal is contrary to Arrowtown's 'Special

Character'. Arrowtown's character values are derived from the built form vernacular. Character values are generated by the form and scale of the Arrowtown buildings. These values are defined in the ADG 2016 as an aggregate collection of shed and lean-to forms of specific proportions.

- The development throughout the 'new town' has been largely single storey. This has respected neighbours' views and sunlight.
The proportion of form is key to urban fabric character values. The proportion of 11+1 or even 8+1m tall buildings on sections sizes 500m² in the MDRZ will be incongruous with the existing Arrowtown character.
- We need to reject the UIV and continue to redevelop and infill the 'new town' on a case-by-case basis as per the 2016 changes. We need to do this with the expectation the Council will assess this redevelopment using the ADG 2016 as a principal tool. The UIV, especially as it relates to Arrowtown is an ideologically driven experiment without any consideration as to whether it would achieve its desired effects.

In conclusion:

- It is unreasonable to foist this sort of 'city like' intensification on well-functioning existing neighbourhoods within a small rural town. Arrowtown is being treated as a suburb and not as a stand-alone town with its own unique set of circumstances.
- Consultation with the community around the UIV was extremely poor considering how Arrowtown planning has been shaped over the last 30 years with community involvement.
- It is accepted that providing houses, especially affordable houses have huge challenges and will not be solved by a one size fits all approach. What is proposed will destroy Arrowtown's 'special character', will pit neighbour against neighbour and lead to poor social and urban design outcomes.
- Infilling and development can already occur on a case-by-case basis as outlined in the 2016 changes to the ADG and the changes to Arrowtown's MDRZ and LDRZ rules. The consequences if these infilling mechanisms have not even been allowed to 'bed in' before the UIV was foisted upon us. There are houses in these zones that will definitely be upgraded over time and more units built as has already been happening and hopefully these will be subject to ADG scrutiny as intended (but not recently carried out)
- Some greenfield development and the relaxation of the Urban Growth boundary on the outskirts of Arrowtown could also be revisited before further intensification is considered.
- There have been no examples provided under the UIV or by QLDC either by way of photographs or modelling to show where intensification has been undertaken to an existing small town urban area where the outcomes have been successful (taking into consideration that this will be over at least ½ of an existing town of national significance)
- There are no examples of how this (both 11+1 metres or revised 8+1 metres) could be achieved in terms of design that relates to the ADG and DP rules. It is contrary to them. The ADG 2016 were shaped through community consultation over the last 30 years They need to be adhered to.

- There is no indication as to how infrastructure could be provided to cater for this level of intensification or the potential disruption that could result from any retrofit.
- While intensification can offer benefits in the right locations, especially in greenfield or brownfield sites, or in large urban areas, decision makers need to consider the specific context of each area and decide if intensification can be implemented thoughtfully and sustainably. In the case of Arrowtown I would suggest this cannot be done. I respectfully ask the commissioners not to implement a flawed ideology ahead of good planning outcomes that will potentially destroy the fabric and character of our much-loved town.

David Clarke July 2025