

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

BY **FRIENDS OF ARROWTOWN VILLAGE**
Various submitters

SUMMARY STATEMENT OF HEIKE LUTZ

Dated: 31 July 2025

Introduction

- [1] My name is Heike Lutz. I prepared evidence for the Friends of Arrowtown Village dated 4 July 2025 on the Urban Intensification Variation (**UIV**) regarding heritage and character. My qualifications and experience are set out in my Statement of Evidence.
- [2] This summary consolidates my expert evidence on the UIV and responds to rebuttal evidence presented by Mr Richard Knott (24 July 2025). It also reaffirms the position that Arrowtown is a distinct and nationally significant heritage township, where intensification requires a more nuanced and context-responsive approach than elsewhere in the Queenstown Lakes District.

Arrowtown's Distinctive Character and Heritage Values

- [3] Arrowtown is not only one of New Zealand's most intact goldfields towns, but also one of the few examples where subsequent development has been managed in a way that reinforces rather than compromises its character.
- [4] Its special character stems from a combination of factors such as modest building scale, a strong relationship to topography and landscape, mature vegetation, including historic tree avenues, organically developed street networks, and a high degree of continuity between historic and contemporary buildings in both scale and materiality.
- [5] These attributes are not limited to the formally scheduled heritage areas such as the Arrowtown Residential Historic Management Zone (**ARHMZ**), but extend across the wider township. They are the result of deliberate planning and design guidance, including the Arrowtown Design Guidelines 2016 (**ADG**), which are distinct in that they apply to the entire township rather than isolated precincts.
- [6] The values at stake include not only architectural features, but also the broader spatial structure of Arrowtown: its rhythm of lot sizes, building placement, setbacks, street character, and the strong interplay between built and vegetated elements. These contribute to a distinct sense of place, one that is recognised nationally and internationally.

- [7] The Panel questioned Mr Knott regarding the distinction between heritage, a matter under section 6 of the RMA, and character, a matter under section 7. As I outlined in my primary evidence (paragraph 61), in the case of Arrowtown the wider townscape (s7) beyond the protected heritage zones (s6) can be likened to the setting of individually scheduled buildings. The protection of that setting (sometimes referred to as the *Extent of Place*) is integral to safeguarding the heritage values of the place.
- [8] In my view, this relationship between setting and heritage is central to the management of Arrowtown's heritage and character values. As Mr Wallace noted in his section 32 report, the Arrowtown Town Centre, Historic Commercial Precinct, and ARHMZ fall squarely within the ambit of s6(f) and have therefore been excluded from the UIV. Which is from an Urban Design perspective understandable. However, in my assessment this does not adequately recognise the significance of the surrounding areas to those heritage values. While these adjoining areas are not themselves meeting any threshold to be considered heritage, they nonetheless contribute materially to the heritage context. Arrowtown's distinctive character cannot, from a heritage perspective, be dissected into isolated parts without eroding its overall integrity.
- [9] For example, Christchurch City Council manages smaller, discrete heritage zones of which some are embedded within larger character areas. These wider character areas function both as valued environments in their own right, and as buffers between heritage areas and higher-intensity development beyond. This approach is feasible in Christchurch due to its size and spatial dimensions. Arrowtown, however, is too small and cohesive for such segmentation to be effective; its heritage and character values rely on the continuity of the whole townscape.
- [10] Arrowtown has never been a static or 'museum' town. It has accommodated considerable growth over the past 50 years, including the addition of low-scale housing areas such as Butel Park and Essex Avenue, and more recently, affordable housing developments through the Queenstown Lakes Community Housing Trust. What these developments have in common is their responsiveness to the town's

prevailing character. The key concern with the UIV is not the concept of growth per se, but the nature and scale of the growth being enabled.

Height, Density, and the Enabling of Three Storeys

- [11] My primary evidence expressed concern that the proposed heights up to 12m in the MDRZ (11m plus 1m for roof pitch) and 8m in the LDSRZ represent a significant departure from Arrowtown's existing built form. These changes are compounded by the removal of minimum lot sizes in the MDRZ and the relaxation of setback and recession plane requirements across both zones.
- [12] The s42A Report has reconsidered the notified framework and recommended to revise the heights proposed to allow for 8m in LDSRZ and 8m plus 1m pitched roof in the MDRZ.
- [13] Mr Knott's rebuttal suggests that three-storey development would be "very difficult" to achieve within the proposed height limits, particularly in the LDSRZ. However, from a design and construction perspective, this is not accurate. Using standard affordable building parameters (2.4m floor-to-ceiling height and 400mm floor thickness), three levels can be accommodated within 8.8–9m.
- [14] Architectural feasibility aside, the visual modelling prepared by Justin Wright in his presentation to the Panel confirms that buildings of three storeys can indeed be constructed within the proposed limits.
- [15] The suggestion that restricted discretionary status and matters of discretion will serve as an adequate control is, in my opinion, insufficient. The ADG 2016 only applies when resource consent is required. Where two residential units are permitted, as is the case in the MDRZ, no such design guidance applies. This presents a regulatory gap, enabling potentially incongruous development without the checks intended to safeguard character.
- [16] Even modest increases in height of 1 to 1.5m, can have significant effects on perceived scale, privacy, solar access, and visual dominance. When these effects are replicated across multiple sites, the cumulative

outcome will be a gradual but irreversible change in the built character of Arrowtown.

A Distinct Context Requiring Tailored Planning Response

- [17] The rationale for intensification across the district has been based, in part, on principles such as walkable catchments and proximity to services. However, Arrowtown is not a regional centre or service node. The entire township is already within a walkable distance of the town centre and Four Square supermarket. It does not have a secondary school, and its infrastructure is constrained, particularly in relation to stormwater, where traditional swale systems are already under pressure.
- [18] It is therefore in my view inappropriate to apply the same intensification logic used for places like Queenstown or Wānaka to Arrowtown. The District Plan already recognises Arrowtown's special status, with tailored objectives and policies in both the MDRZ and LDSRZ chapters (e.g., Objectives 7.2.4 and 8.2.4). These provisions are aimed specifically at ensuring development remains compatible with Arrowtown's character. The proposed UIV amendments, in my opinion, are inconsistent with this direction.
- [19] Arrowtown is more appropriately compared with other heritage settlements such as Akaroa, Coromandel Township, Thames, or Greytown. These towns have been excluded from blanket intensification and, in many cases, have introduced additional protections, such as buffer zones and lower height limits, to manage transition areas.
- [20] Akaroa, for example, has been completely excluded from Christchurch City Council's intensification response due to it not being considered as part of Christchurch's urban environment. As noted in council's response to Minute 4, Arrowtown is also located outside of the central parts of the District's urban environment (paragraph 14). However, it is treated as if it would form part of the urban environment.
- [21] The drivers of growth in Arrowtown, seasonal tourism, lifestyle migration, and its perceived amenity, cannot be addressed through blanket upzoning alone. The community's long-term support for sensitive infill

and architectural variety demonstrates that appropriate growth is possible, commensurate with the level of accessibility, or the demand for housing (types). What is required is not resistance to change, but planning that reflects context and character.

- [22] In the Council's response to Minute 4 (paragraph 5), the purpose of the UIV is described as giving effect to Policy 5 by enabling a range of different development types, rather than addressing any identified shortfall in development capacity. Evidence from recent developments in Arrowtown (see paragraph 10 above) demonstrates that such diversity in development can be achieved while maintaining the heritage and character values that define and distinguish the township.

Conclusion

- [23] In conclusion, the proposed height and density provisions of the UIV, even in their amended form, remain incompatible with the heritage and special character values of Arrowtown. They risk introducing development outcomes that are out of scale, out of character, and poorly suited to the existing urban structure.
- [24] The regulatory reliance on the ADG is overstated. The Guidelines are limited in their application to consented development and are not triggered for permitted activities. This weakens their influence at precisely the point where bulk and scale are being increased.
- [25] Arrowtown's character is the product of layered planning, stewardship, and community involvement. A site-responsive approach is necessary to manage change, one that allows for housing diversity without undermining the qualities that make Arrowtown one of New Zealand's most exceptional heritage towns.
- [26] In my professional opinion, the current direction of the UIV requires further refinement to ensure that the town's distinctive character is not irreversibly compromised by the cumulative effects of over-enabling provisions.

Dated: 31 July 2025

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Heike Lutz