

# Speaking Notes for Oral Submission on Urban Intensification Variation to the proposed Queenstown Lakes District Plan

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to: **The Independent Hearings Panel**  
by email to: [dp.hearings@qldc.govt.nz](mailto:dp.hearings@qldc.govt.nz)

by: Christina Dawson  
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**Original Submitter No: 818**

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## Summary of points covered in the oral submission

1. Acknowledgement of Council staff in preparation of their reports and the UIV.
2. **I am a lay submitter.**

The content of the submission I am giving is based on:

- a. My lived experiences from being a resident of Arrowtown since 2004 particularly as it relates to the changing face of our community, changes to our housing market and changes to our population.
- b. Active involvement in the Arrowtown community serving on various community groups and committees including Arrowtown Plunket, Arrowtown Pre-School Committee, Arrowtown School
- c. Anecdotal “evidence” gained from conversations with: fellow “Arrowtowners” and close neighbours; other residents of the Wakatipu Basin; visitors to Arrowtown and the wider area.

The scope of my submission is limited to the UIV as it applies to Arrowtown only. Arrowtown is the only place I have lived in since our move to the Wakatipu basin in 2004.

Although the council have addressed some concerns about the MDR zone provisions in the notified UIV, I don't believe they go far enough for Arrowtown.

### **3. What decision/s am I seeking from the Hearings Panel**

- a. That their recommendation to council is to remove Arrowtown from the UIV entirely on the basis that it is unsuitable for intensification.

#### **4. What is so special about Arrowtown?**

The things that are important and significant to me as a resident are:

##### **Amenity values of:**

- a. Access to local walking and bike tracks
- b. The low profile of most of the housing which allows access to sunlight & views and a pleasant space in which to live, work & play.
- c. The sense of community fostered by:
  - i. Neighbours sharing produce from gardens and fruit/nut trees
  - ii. A broad demographic from young professionals, to families, middle-aged, and retired people.
  - iii. A community that is very engaged with many active community groups involved in a wide range of activities: sports clubs, scouts, volunteer fire brigade, clubs oriented to young people (Mainly Music), church groups, conservation etc.
  - iv. A generally friendly community where people are happy and it is normal to greet each other in the street and most Arrowtowners know a large number of the community.

#### **5. What are my concerns about the UIV for Arrowtown?**

- a. That any intensification in Arrowtown will deprive current and future residents of these amenity values, particularly access to views and sunlight and particularly in light of the topography with the closeness of surrounding hills/mountains coupled with the already compromised sunlight hours in winter.
- b. That it won't have the outcomes sought by the NPS UD in terms of:
  - i. Provision for housing in accordance with demand  
What does demand actually mean?  
Who wants to live here?  
Who can afford to live here?  
According to council's own projections, there is already enough provision for housing to cater to future growth in Arrowtown.
  - ii. Concern that additional housing from intensification will not address housing affordability and only supply housing suitable for visitors or out of town owners and drive property values higher and further out of reach for "locals" (current and future).  
The existing PDP already allows for intensification and we are already seeing evidence of housing unsuitable for long term residents of Arrowtown.

Further provision for intensification is likely to just make this worse.

e.g. 4 Pritchard Place, 11 Cornwall St

We live on the very edge of the MDRZ at 19 Preston Drive and our property is “ripe” for the kind of intensification allowed for in the current PDP, the notified UIV, and the amended UIV under the s42a report.

**References to:**

- 1. Fig 1 & Fig 2 Census data in Appendix A.**
- 2. Photographs of 4 Pritchard Place.**
- 3. Photographs of 19 Preston Drive showing sun shading.**

- c. Why does the council insist on including Arrowtown in the Queenstown urban environment when the RMAA 2021 specifically allows for its exclusion under the definition for “relevant residential zone” in Subpart 1 – Interpretation and definitions : Section 2? If it wants to “borrow” the “qualifying matters” section of the NPS UD as it relates to Tier 1 urban environments, then why not this.

**Reference to Hansard Record Extract in Appendix A**

- d. Why did the council planning officer in the s42a report specifically exclude submissions that deal with:
- i. Definitions of “urban environment”.  
QLDC has decided, seemingly arbitrarily, to incorporate Arrowtown (and other smaller residential areas) into the Queenstown urban environment. This makes no sense.
  - e. Arrowtown is unsuitable for intensification for other reasons such as:
    - i. Not really accessible to Queenstown/Frankton for employment opportunities
      1. Limited public transport.
      2. Traffic congestion which is already bad during peak hours.
    - ii. Doesn’t meet NPS UD policy of reducing greenhouse gas emissions if people are going to be travelling to Queenstown/Frankton in their cars to access employment, amenities and recreational facilities.
    - iii. Infrastructure constraints:
      1. Water supply – already have low pressure at times
      2. Storm water – increased intensity of housing reduces permeable surfaces which will contribute to run-off and ice in winter.

Why did the council planners choose to reject submissions that raised issues of infrastructure?

We have significant issues with our infrastructure capacity and the financial capacity to deal with them.

6. References to other documents and information sources that I will be referring to in my submission:

- a. NPS UD
- b. RMAA 2021 – specifically the definition of a relevant residential zone 2 under Part 1 -
- c. Notified UIV 2023
- d. QLDC s42a Report on proposed UIV
- e. QLDC PDP Zoning map for Arrowtown

**As supplied in Appendix A.**

- f. Hansard record extract mentioning Akaroa and populations of under 5000.
- g. Census data from Statistics NZ for 2013, 2018 & 2023 Census
  - i. Population data **Fig 1.**
  - ii. Housing data including occupancy rates **Fig 2.**
- h. Screen shot of Google Maps **Fig 3.**
- i. Photographs of 19 Preston Drive **Fig 4-6.**

# Appendix A – References to Oral Submission on QLDC proposed UIV

Christina Dawson Arrowtown – Submitter 818

## Hansard Record

Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill — Second Reading

**Sitting date:** 7 Dec 2021

Web link:

[https://www.parliament.nz/en/pb/hansard-debates/rhr/combined/HansDeb\\_20211207\\_20211207\\_48](https://www.parliament.nz/en/pb/hansard-debates/rhr/combined/HansDeb_20211207_20211207_48)

Hon DAVID PARKER:

Having considered the submissions, the committee made some other recommendations. They've recommended that we broaden the scope of the streamlined planning process that's being used so that they can make consequential changes that are complementary to the MDRS and the NPS urban de-intensification policies. They want us to clarify that existing plan provisions which are not inconsistent with the bill will continue to have effect. They make it clear that only specified standards in the new medium-density residential standard will have immediate effect, and other rules like updating financial contributions will be subject to some further consultation requirements.

In respect of the main other changes: as to the standards, populations of less than 5,000 people are being excluded, so the likes of Akaroa and other small townships and offshore islands aren't included because they're not as appropriate for this intensification.

Fig 1

## Arrowtown Population by Census from 2013 to 2023

Census	Total Pop	Under 15	15-29	30-64	65+	
2013	2,469	597	282	1,293	297	
2018	2,853	600	456	1,458	339	
2023	2,838	531	396	1,419	486	+ 147

\* 2023 Census data for Arrowtown includes Arrowtown Lifestyle Village in McDonnell Road which has a current population of 130 (July 2025)

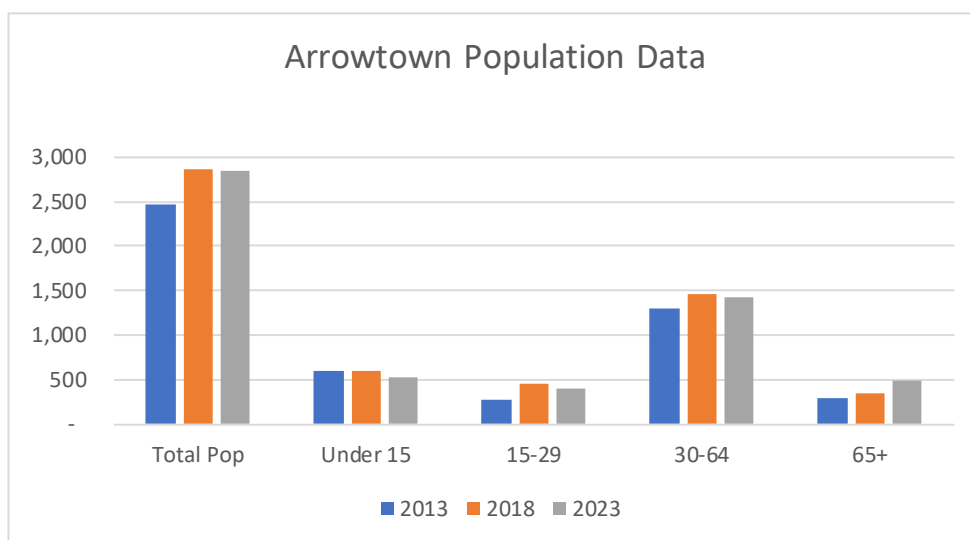


Fig 2

## Arrowtown Housing Stats from Census data for 2013 to 2023

Census	Occupied	Unoccupied	Total	Change on Prev Total	% unoccupied
2013	993	366	1359		27%
2018	1032	375	1407	48	27%
2023	1125	465	1590	183*	29%

\* 2023 Census data for Arrowtown includes Arrowtown Lifestyle Village in McDonnell Road where 78 new houses had been built since the previous census

Fig 3. – Arrowtown Map showing location of 19 Preston Drive within the MDRZ (marked by red arrow)

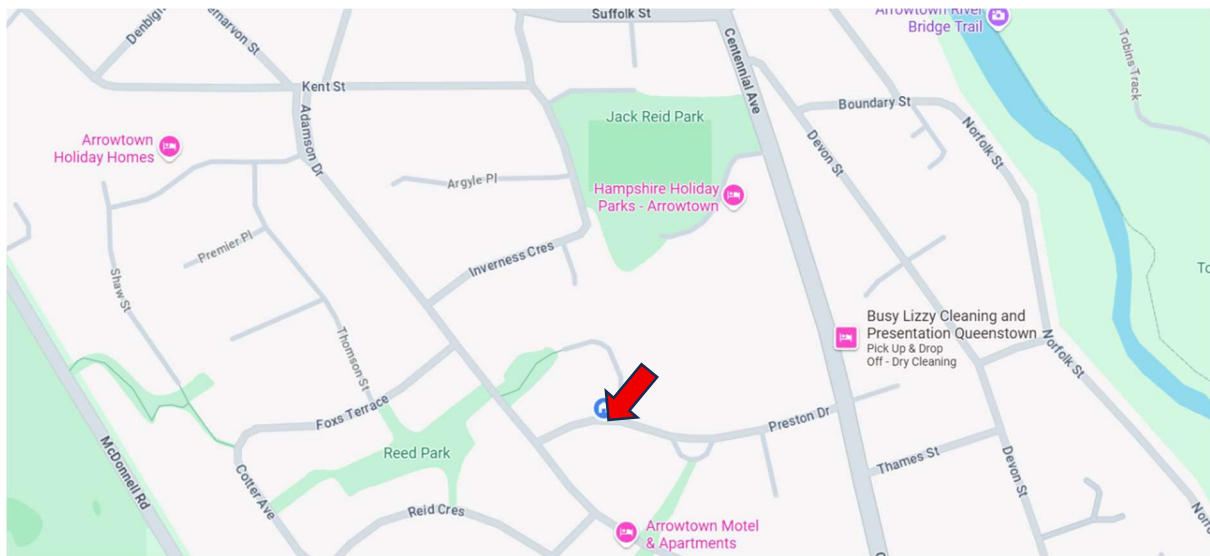


Fig 4 – 19 Preston Drive. Taken 12:37pm on 8 July 2025





Fig 5 – 19 Preston Drive looking across to 22 Preston Drive (in LDRZ).  
Showing shading. Taken 12:37pm on 8 July 2025



Fig 6 – 21 Preston Drive showing views and shading from No. 19  
Taken 12:37pm on 8 July 2025





## Submission to Queenstown Lakes District Council

**Regarding:** **Proposed Urban Intensification Variation** to the District Plan

**From:** Christina Dawson,  
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### **Declarations:**

I **could not** gain an advantage in trade competition through this submission.

**Yes**, I wish to speak in support of this submission.

**Date of Submission:** 5 October 2023

### **Submission**

I oppose the adoption of this variation in its entirety. I particularly oppose the inclusion of Arrowtown as part of the Queenstown urban environment for the following reasons:

1. **The variation is inconsistent** with significant aspects of:

- The National Policy Statement on Urban Development - NPS UD
- The Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 – RMAA 2021

For example:

- a) There are urban areas, such as Arrowtown, that have been included in the variation that demonstrably do not meet the “relevant residential zone” definition in the RMAA.
  - b) Changes to height restrictions and recession planes for low density zones are an unnecessary inclusion in the variation.
  - c) The variation fails to make the distinction between a tier 2 authority (QLDC & ORC) and a tier 2 urban environment. The NPS UD specifies Queenstown as a tier 2 urban environment. It does not specifically include Wanaka, Arrowtown, or Hawea, for example. All of which, the council has chosen to include.
  - d) Urban intensification is supposed to provide housing for people that is close to amenities and employment opportunities. Arrowtown has limited employment opportunities within the town boundary, and it is questionable whether the amenities available in Arrowtown itself would adequately service an increased population.
2. **There is insufficient existing or planned infrastructure** to support urban intensification in the areas included in the variation.

Our existing communities do not have sufficient infrastructure provision NOW, let alone for any planned growth.

Both QLDC and the ORC (Otago Regional Council) have also demonstrated that they are not able to deliver planned services adequately which give me absolutely no confidence that plans to expand or develop infrastructure will fare any better.

For example:

**Transport** – The ORC has plans to increase the frequency of buses across the local network. They are unable to get enough drivers to provide the existing service let alone service more buses.

**Firefighting** – The Arrowtown Volunteer Fire Brigade does not currently have the capacity to fight a 3-storey fire.

**Telecommunications** – there are already many dead spots in Arrowtown in the 4G coverage area. Planned additions to existing masts by mobile providers only go to 8 metres. 4G relies on clear line-of-sight for robust signal, so 12 metre buildings will completely obliterate signal from an 8-metre-high mast and potentially leave residents without any telephone communications at all. Not ideal if you are an elderly person living alone and in need of an ambulance or the fire brigade.

**Water supply** – there are already periods where we experience water shortages and restrictions in Arrowtown. The water supply to Arrowtown comes from the Arrow river. It is doubtful that there is additional capacity to supply more water to Arrowtown.

**Electricity** – Arrowtown residents already experience a number of power outages, particularly during the winter months. An increased number of households which will arguably require more heating due to the deprivation of sunlight by 12m high buildings.

3. **The variation includes areas that are unsuitable for urban intensification** whilst excluding others (such as Arthurs Point) that have been subjectively identified by council staff.

In the case of Arrowtown, the planning staff who prepared a report to the council inferred that the Medium Density Zone (MDZ) in Arrowtown had no special character. This was the entirely subjective opinion of one council staff member and based solely on the type of housing that exists in this zone. It completely ignored the fact that Arrowtown has a unique character due to its spaciousness, access to walking trails, nature, views of surrounding mountains, low light pollution, urban green spaces, high level of attractive tree planting on both residential sections and reserve areas. All of this is at risk, if the variation proceeds and people start developing their sections and removing trees and blocking neighbour's and visitors' views and sunlight.

Arrowtown has a significant number of people who spend large portions of their day at home for various reasons. For example, many of our residents are retired. If their neighbours start building 12m high apartment blocks close to their boundaries: they will lose what little sunlight they currently enjoy; their vegetable gardens will no longer be productive making life more expensive and removing the ability to get exercise in their own back yards; their outdoor environments will become dangerous in the winter due to permafrost and black ice resulting in more accidents and pressure on our health sector; their houses will be colder, making people sicker and requiring more heating and another increased cost of living.

My house sits on the edge of the Medium Density Zone in Arrowtown. Many children pass through the Medium Density Zone in Arrowtown on their way to and from school and school buses. I see them walking and cycling past my house twice daily. There are also many people who walk through the streets of the MDZ on their way to the 4 Square or for recreational purposes. 12 M high buildings would destroy the character of this part of Arrowtown and make it dangerous in the winter months. As previously mentioned, there are large areas of permafrost

and black ice in winter already. If 12M high buildings were built in this zone, it would simply be dangerous, creating larger areas of slippery surfaces.

Creating a 12M high “ghetto” in the middle of Arrowtown would:

- a. Divide the town into 3 distinct areas, destroying the community cohesion that Arrowtown currently enjoys.
  - b. Destroy the views of a lovely leafy town from local walking tracks.
  - c. Pit neighbours against each other and simply make the existing residents of single level dwellings miserable and anxious.
  - d. Deprive existing residents the amenity values of: sunlight, views, connection to nature, connection to neighbours, safe spaces to exercise and enjoy recreation, existing vegetable gardens.
  - e. Make neighbouring streets parks and reserves: viewless, dark, cold, dangerous, and unpleasant.
4. **The process for the preparation and notification of this variation has been utterly deficient.**  
The NPS UD and the subsequent legislative changes constitute the most significant impact on urban planning and design in some 30 years since the passing of the Resource Management Act 1991.

The proposed variation makes possible a wholesale change to the structure and environment of the communities that the council is supposed to serve. That the public have had virtually no opportunity (until now), to understand the ramifications of urban intensification or to share their views on it with either council representative or council staff is extremely disappointing.

A better process would have been to begin public consultation and education soon after May 2022 when the final NPS UD was released and Queenstown identified as a Tier 2 urban environment.

I also do not believe that Council members were given sufficient time to consider either the staff report or the variation proposal prior to voting to publicly notify the variation. Councillors should have insisted on more time to consider both the report and the variation proposal before voting to notify. This would have given them some time to consult with their constituents. It is disappointing that the councillors, with one exception, voted to publicly notify without first giving the variation due consideration.

Further, the variation refers to a document that is yet to be prepared or even released. Nor have the residents of Arrowtown been given the opportunity to input into it. This is the Arrowtown Design Guidelines 2023.

5. **The variation is unlikely to answer the need for more housing in Queenstown.**  
The Queenstown Lakes District is somewhat unique in the NZ housing market. Many homes in the area are not owner or renter occupied. They are instead owned by people who use them as holiday homes and either leave them vacant when not in use or make them available for visitor accommodation.

As at the 2018 census, there were 1,392 private dwellings in Arrowtown. 27% or 372 of these were unoccupied.

Increasing the housing stock in Arrowtown and parts of the wider district is not necessarily going

to create further housing for local workers. It instead runs the risk of simply providing more visitor accommodation and holiday homes for wealthy out of town owners.

Rather than simply building more and bigger houses, the council should be concentrating on filling the housing stock that we already have and lobbying central government to make any legislative changes that enable it to do so.

**6. The variation is likely to increase road traffic in the district.**

One of the intentions of the NPS UD is to decrease traffic congestion. This is presumably due to the provision of housing closer to employment opportunities and the increased use of public transport.

If the number of dwellings in Arrowtown is increased, there is likely to be a greater number of houses available for holiday homes or visitor accommodation. Given that most of these people will be driving car, it will only increase the pressure on our roading network and increase traffic volumes.

**7. The variation is at odds with the intentions of the central government** and the then Minister for the Environment in drafting and developing the legislation that underpins and the necessary legal authority to the NPS UD.

The Minister for the Environment (Hon. David Parker), during the second reading of the RMAA 2021 on 7 December 2021 said:

***“In respect of the main other changes: as to the standards, populations of less than 5,000 people are being excluded, so the likes of Akaroa and other small townships and offshore islands aren't included because they're not as appropriate for this intensification”.***

**8. The variation is inconsistent** with the Council's own promotion of the area.  
for example:

Arrowtown is promoted as an “historic town” in the “surrounding region” & “near to Queenstown” on the Queenstownnz.co.nz website.

The variation appears to be treating Arrowtown as a suburb of Queenstown, which it is demonstrably is not.

**9. The variation fails to distinguish between existing housing areas and new developments** in terms of intensification plans.

**10. The variation allows for population growth in excess of the council's own projections.**

According to the council's own demand projections, Arrowtown is only expected to increase in resident population by 100 people between 2023 and 2053.

**11. The variation violates the council's own planning instruments** in terms of:

- a. Queenstown Lakes Spatial Plan 2021
- b. Arrowtown Design Guidelines 2016

**12. I believe that there are developments** have already been given non-notified consent that are non-compliant. This variation would simply provide more “wiggle room” to developers at some cost to the welfare and wellbeing of residents.

**13. The proposed variation risks significant and costly legal action** against the council in the Environment Court.

## Decisions sought from the Council

1. Vote not to adopt the proposed Variation without significant changes and significant consultation with the public.
2. Ensure that Arrowtown and other unsuitable urban environments be removed from any urban intensification plans.
3. Rezoning of the Arrowtown MDRZ and the creation of a new zone which incorporates existing allowable building activity whilst protecting Arrowtown as a whole from further intensification in existing residential areas.
4. To investigate methods by which the council can encourage more use of existing housing stock to increase housing supply rather than simply building more houses.
5. Seek clarity from the Ministries for the Environment & Housing and Urban Design on aspects of the NPS UD that leave room for ambiguity in the case of Queenstown Lakes District namely:
  - a) What exactly is meant by “Queenstown” as a Tier 2 urban environment. Should the council be including areas like Wanaka, Arrowtown & Hawea for example.
  - b) Infrastructure requirements
6. Lobby Central Government to enable any legislative changes that would be required to meet the unique planning needs of the Queenstown Lakes District.
7. Adopt the Arrowtown Design Guidelines 2016 (or revised version) into the District Plan and ensure staff adherence to the same when reviewing consent applications.