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Private Plan Change Request to the Operative and Proposed Queenstown Lakes District

**Evaluation under section 32 of the Resource
Management Act 1991**

Arrowsouth Properties Limited

McDonnell Road, Arrowtown

July 2026

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1 Introduction

1.1 Overview

Arrowsouth Properties Limited (**APL**) is requesting (**Request**) a change to parts of the Queenstown Lakes District Council's (**QLDC**) Operative District Plan (**ODP**) and Proposed District Plan (**PDP**)

The Request relates to changing the current ODP zoning that applies to a large area of land (the **Site**) that adjoins or is located in close proximity to McDonnell Road, Arrowtown. The proposed zoning regime that is sought will enable low density residential development to occur within certain areas of the Site.

The Site is currently contained within the Arrowtown South Special Zone (**ASSZ**) in terms of the ODP. To date, the ASSZ has not been included the staged District Plan review that commenced in 2015 nor within the PDP Urban Intensification Variation (**UIV**) that commenced in 2024.

Specifically, the Request seeks to change the zoning from the ODP ASSZ to the PDP Suburban Residential Zone (**SRZ**) (as renamed by the decisions for the UIV). Building Restriction Areas (**BRA**) are proposed in certain areas of the Site so as to avoid residential development. Bespoke policy provisions are also proposed to be inserted into Chapter 27 (Subdivision and Development) within the PDP, together with PDP mapping changes. These provisions will provide direction on a number of considerations at the time of subdividing the Site for residential purposes.

Following the required evaluation, the reasoning behind promoting the SRZ is that it is a logical rezoning approach as this zone adjoins the Site on two boundaries, while the BRA is a standard PDP provision that is used to avoid development on specified land. With this imposition of the SRZ, future residential development within the Site will mirror the style and density of existing residential development that adjoins the Site on two boundaries.

The Request also seeks to alter the location of the Urban Growth Boundary (**UGB**) that traverses through the site. The UGB is indicated in both the ODP and PDP. The UGB will be moved to the southern boundary of the Site.

Section 2 within the document titled 'Private Plan Change Request' sets out the background to and reasons for the Request, together with the amendments requested to the ODP and PDP. The assessment of effects in relation to the Request are contained within Section 4 of this document.

Any change to a plan needs to be evaluated in accordance with section 32 of the Resource Management 1991 (**RMA**). This document provides the s32 evaluation for the Request.

Section 32 of the RMA states:

32 Requirements for preparing and publishing evaluation reports

(1) An evaluation report required under this Act must—

- (a) examine the extent to which the objectives of the proposal being evaluated are the most appropriate way to achieve the purpose of this Act; and*
- (b) examine whether the provisions in the proposal are the most appropriate way to achieve the objectives by—*

- (i) identifying other reasonably practicable options for achieving the objectives; and*
- (ii) assessing the efficiency and effectiveness of the provisions in achieving the objectives; and*
- (iii) summarising the reasons for deciding on the provisions; and*

- (c) contain a level of detail that corresponds to the scale and significance of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the proposal.*

(2) An assessment under subsection (1)(b)(ii) must—

- (a) identify and assess the benefits and costs of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the provisions, including the opportunities for—*

- (i) economic growth that are anticipated to be provided or reduced; and
 - (ii) employment that are anticipated to be provided or reduced; and
 - (b) if practicable, quantify the benefits and costs referred to in paragraph (a); and
 - (c) assess the risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the provisions.
- (3) If the proposal (an amending proposal) will amend a standard, statement, regulation, plan, or change that is already proposed or that already exists (an existing proposal), the examination under subsection (1)(b) must relate to—
- (a) the provisions and objectives of the amending proposal; and
 - (b) the objectives of the existing proposal to the extent that those objectives—
 - (i) are relevant to the objectives of the amending proposal; and
 - (ii) would remain if the amending proposal were to take effect ...

The evaluation relies on the description provided in the Request, the various supporting technical reports and the assessment of effects on the environment.

1.2 Consultation

Informal consultation has been undertaken with the neighbouring residential property owners via a letter drop undertaken in early March 2026. The residential neighbours that were contacted consisted of the existing properties located within the Site and those located off Cotter Avenue/Advance Terrace. The letter from APL has invited direct feedback from these property owners. To date, limited feedback has been provided from the subject neighbours to APL following the letter drop.

Various discussions have also been undertaken with the adjoining landowner to the south of the Site, being the owner of the property located at 175 McDonnell Road.

No direct consultation in relation to the rezoning has been undertaken to date with the Otago Regional Council (**ORC**) or iwi (Aukaha and Te Ao Marama Incorporated). A full copy of the revised Request will shortly be sent to iwi.

The Request will be subject to a publicly notified process under the RMA, whereby neighbouring property owners and other interested persons or organisations can make a submission on the merits of the Request.

2 Section 32(1)(a): the purpose of the RMA, objectives of the proposal, options and examination

2.1 Purpose of the RMA

Section 5 defines the purpose of the RMA:

- (1) *The purpose of this Act is to promote the sustainable management of natural and physical resources.*
- (2) *In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic, and cultural well-being and for their health and safety while—*
 - (a) *sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and*
 - (b) *safeguarding the life-supporting capacity of air, water, soil, and ecosystems; and*
 - (c) *avoiding, remedying, or mitigating any adverse effects of activities on the environment.*

The purpose of the RMA is to promote the sustainable management of natural and physical resources. This has an enabling component (using, developing and protecting resources to enable wellbeing) and a regulating component (sustaining the potential of resources to meet the reasonably foreseeable needs of future generations; safeguarding the life-supporting capacity of air, water, soil, and ecosystems; and avoiding, remedying, or mitigating any adverse effects of activities on the environment).

The purpose of the RMA is given effect to by the hierarchy of national, regional and district-level planning instruments. The various planning documents of relevant to the Request are detailed and addressed below.

2.2 Objectives of the Request

The key objectives for the Request are as follows:

- a) To rezone the Site so as to enable future low density residential subdivision and development to occur within certain areas of the Site. The evaluation concludes that the PDP SRZ (with bespoke policy provisions) is the most appropriate zoning approach in order to achieve this objective.
- b) To include areas of the Site within a BRA so as to avoid residential development on the specified land; and
- c) To amend the location of the ODP and PDP UGB.

On the basis that the key objectives of the Request are achieved by APL, approximately 2.34 hectares of land within the Site can then be subdivided and developed in the future for low density residential purposes. The style of additional residential development that will occur within the Site will be consistent with the existing residential built environment located to the immediate north and east of the Site.

The use of the BRA's within the Request has been purposely included so as to avoid residential development on land that is deemed sensitive to develop. Notwithstanding the existing trail that is protected by a right of way easement (pedestrian) over Lot 103 DP 535793, the purpose of the proposed BRA's is to avoid residential development as opposed to providing further and/or new public access. However, during a future resource consent process to subdivide the Site, it is possible that the proposed BRA land could be vested in Council ownership, thereby providing for public access. Alternatively, if the BRA land is to remain in private ownership, easements in favour of the Council for public access could also be

imposed/volunteered during the subdivision process. As such, it is not proposed to specifically address public access via the BRA's in a policy context for the Request.

Bespoke policy provisions are proposed in order to provide direction on a number of considerations at the time of subdividing the Site for residential purposes. The bespoke provisions are addressed below.

2.3 Options under section 32(1)(a)

Section 32(1)(a) requires that an evaluation report required under the RMA must examine the extent to which the objectives of the Request being evaluated are the most appropriate way to achieve the purpose of the RMA.

In determining whether the objectives of the Request are the most appropriate, a comparison of the potential options should be addressed. The identified options include:

- a) Maintaining the status quo in terms of the zoning under the ODP (i.e. do nothing);
- b) Formally varying the current zoning under the ODP;
- c) Promoting a bespoke new zone under the ODP or PDP;
- d) Rezoning the Site to the PDP SRZ (together with the use of BRA's and bespoke policy provisions).
- e) Rezoning the Site as contained in this Request to the PDP Medium Density Residential Zone (**MDRZ**) (together with the use of BRA's and bespoke policy provisions).

The options will be addressed in detail below.

2.4 Examination of the options

The potential options are addressed below.

Option 1: Status Quo

The status quo will maintain the existing ODP zone that governs the site together with the UBG that runs through the site. The current open space requirements from the ASSZ (reinforced through the OOSPM and POSMP) will remain.

This option has the advantage of not requiring a private plan change, thereby avoiding the costs of this particular process. However, at some point in the near future, the QLDC will be required to review the ODP zoning that is afforded to the Site, which in itself will involve direct costs to the QLDC and the community.

The main disadvantage of maintaining the status quo is that the opportunity to increase the supply of suitable low density residential development in Arrowtown that is appropriately located in terms of existing residential development and infrastructure servicing is lost for the foreseeable future. This is on the basis that residential development is not anticipated (via a prohibited activity status) within the portion of the Site where future residential development is proposed.

On the basis of the above, the existing zoning under the ODP would not serve the objectives of the Request, whereby land that could be appropriately development for residential development is not achieved. This would lead to the inefficient use of land which does not achieve the higher order provisions of the PDP or to achieve the purpose of the RMA.

Option 2: Formally varying the current zoning under the ODP

This option would entail formally amending the current ASSZ provisions within the ODP to cater for the objectives of the Request via a plan change.

This option has been primarily discounted on the basis of the age of the ASSZ and the ODP in general. While the ASSZ was made operate over 10 years ago, the ODP dates back to the then 1995 PDP (which then became the ODP in the early 2000's).

Through the staged PDP Review, the QLDC has reviewed, updated and changed many of the ODP zones through the more modern strategic lens of the PDP higher order chapters and national direction (i.e. National Policy Statement for Urban Development 2020 (**NPD-UD**)).

While the ODP could be varied to cater for the Request, it is considered more efficient from a planning perspective to incorporate the Request into the realm of the PDP, in particular when dealing with the higher order policy direction within the PDP and national directions.

Option 3: Promoting a bespoke new zone under the ODP or PDP

Both the ODP and PDP contain a significant number of bespoke or special zones.

From a District Plan administration perspective, it is preferable to utilise an existing PDP zone as opposed to creating a new special zone under the PDP. While bespoke or special zones are appropriate in certain circumstances, such zones can add a layer of unnecessary complexity to the land contained in such a zone.

Further, creating a new bespoke zone in the PDP runs counter to the nationally-led RMA replacement approach in terms of standardised and common zoning approaches via the National Planning Standards.

For the above reasons, a new bespoke zoning regime for the Site has been discounted. Finally, it is noted that in pre-lodgement discussions with the Council in terms of this Request, the Council advised its preference to not create a new bespoke zoning regime for the site, within either the ODP or PDP.

Option 4: Rezoning the Site to the PDP SRZ (together with BRA's and bespoke policy provisions).

The SRZ is the predominant low density residential zone in the District, with this zone fundamentally providing for both traditional and modern suburban residential densities. The SRZ is also the largest residential zone in Arrowtown and borders the Site on two boundaries (with developed properties). Further, the existing residential properties within the Site are characteristic of the style of residential development that is enabled in the SRZ.

The use of the BRA on certain parts of the Site to prevent residential development is also a common planning tool that already exists in the SRZ. The purpose of the BRA is to avoid development as opposed to providing for public access, however, during the future subdivision process, landownership and public access over the BRA land can be appropriately addressed.

Bespoke policy provisions can also be utilised to address a variety of specific considerations at the time of subdivision. Provision 27.3 within Chapter 27 (Subdivision and Development) of the PDP contains objectives and policies that relate to specific locations within the District. As part of the Request, in combination with the SRZ and BRA, it is proposed to incorporate the following new objective and policies under Provision 27.3 in Chapter 27:

McDonnell Road Suburban Residential Zone

Objective 27.X.X.X *High quality low density residential subdivision and development is enabled, while appropriately providing for amenity, mitigation and riparian plantings, together with controlling access onto McDonnell Road.*

Policies

27.X.X.X *Require a 4.5m planting strip along the McDonnell Road frontage (excluding any primary vehicular access point(s)) and a 5m planting strip along the southern boundary of the zone.*

27.X.X.X *Maintain existing riparian planting along the waterbody that flows through the zone.*

27.X.X.X. *To provide on-going management of plantings, weed and pest control for any privately owned communal land.*

27.X.X.X *Avoid private fencing over 1.2m on boundaries of residential lots that adjoin a Council reserve containing a waterbody, the southern boundary of the zone and for any residential lot boundaries that adjoin a legal road.*

27.X.X.X *To require the identification of the Building Restriction Area at the time of subdivision within the zone.*

27.X.X.X *Avoid private vehicle crossings (and access) onto McDonnell Road from residential lots that adjoin this road.*

The new policy provisions can be implemented via Rule 27.5.7 that deals with urban subdivision within the District.

It would also be prudent to provide a demarcation on the PDP planning map that indicates the area of the SRZ that adjoins McDonnell Road that will be subject to the proposed policy provisions. This is a common mapping tool within the PDP. It is noted that Figure 1 (under Provision 4.1.2) in Chapter 4 of the PDP will need to be updated to incorporate the Request.

Aside from the financial costs of the Request, the key disadvantage of the rezoning outcome is that a portion of the Site that is presently protected open space will be developed for residential purposes. However, the Request will result in the following advantages:

- a) Rezoning of the Site will meet the key objectives of the Request;
- b) Rezoning of the Site will provide certainty in terms of the ability to gain resource consent(s) to subdivide and develop appropriate parts of the Site for residential purposes;
- c) There will be an appropriate expansion of residentially zoned land that will provide additional well placed residential sections in the context of the existing urban area of Arrowtown;
- d) Residential development of sensitive land will be avoided by the use of the BRA's.
- e) The minor expansion of the SRZ to accommodate the Request will contribute to the relevant higher order goals in the PDP and NPS-UD;
- f) With required infrastructure upgrades (as confirmed by the Council) in terms of wastewater disposal, future residential development of the Site can be accommodated by existing infrastructure servicing;
- g) The Request will not cause adverse effects on the environment that cannot be appropriately avoided, remedied or mitigated.

Option 5: Rezoning the Site to the PDP MDRZ (with BRA's and bespoke policy provisions)

The PDP MDRZ (UIV version) is centrally located in Arrowtown, largely between the Arrowtown Residential Historic Management Zone and the SRZ.

The PDP states that the MDRZ has the purpose of providing land for residential development at a greater density than the SRZ, with the main form of residential development being anticipated in the form of terrace housing, semi-detached housing and detached townhouses. Within the MDRZ, residential density is anticipated down to 250m² (net area) per residential unit, while the minimum vacant lot size in the MDRZ is also 250m².

While Policy 8.2.4 in the MDRZ seeks that medium density development in Arrowtown is compatible with the town's character, imposing the MDRZ on a reasonably large vacant greenfield site will lead to a very different style and density of residential development when compared to the adjoining residential development (and within the Site), which is characterised by low density residential living.

In general, the properties located within the existing MDRZ in Arrowtown were developed under previous low density planning regimes over a significant period of time, with standalone residential units on properties being the prevalent built form within this zone. As such, to date the utilisation of the density allowances under the existing MDRZ in Arrowtown has predominately involved infill residential development.

The Site subject to this Request will be different to the existing MDRZ in Arrowtown, in that it will be a vacant greenfield site. If rezoned to MDRZ, it is more than likely that the density allowance of 250m² will be utilised throughout the Site, resulting in a greater density and different style of development when compared to the adjoining residential environment.

While the imposition of the MDRZ on the Site will provide the potential for a larger supply of residential sections/units when compared to the SRZ, the density enabled under the MDRZ will not be compatible with the adjoining residential built environment (including within the Site). Further, the MDRZ on the Site will be a reasonably small area of land (in the context of Arrowtown) that is distance and geographically isolated from the existing MDRZ in Arrowtown.

Based on the above, it is considered that the rezoning of the Site to the MDRZ will be an incongruous and inappropriate addition to the residential built environment in Arrowtown.

2.5 Preferred Option

The key objective of the Request is to rezone the Site so as to enable low density residential subdivision and development to occur, while concurrently restricting development from certain areas of the Site and moving the ODP/PDP UGB in a southerly direction.

Based on the above analysis of the options, the objectives of the Request are best achieved by way of a plan change that will enable the Site to be rezoned to the PDP SRZ, with parts of the Site being contained within BRA's where development is to be avoided. Bespoke policy provisions (included in Chapter 27 of the PDP) will deal with a range of considerations when subdividing the Site, together with PDP mapping tools that distinguish the Site from the general SRZ.

The approach of seeking to include the Site within the SRZ means that the land will be removed from the ODP and in turn included in the PDP.

While the Site forms part of the wider ASSZ under the ODP, the Request does not seek to change all of the ASSZ. The rationale for this approach is that the wider ASSZ contains multiple landowners who could or will have different aspirations for their land. Further, detailed assessments will be required for any potential zoning changes for the wider ASSZ land, with such assessments taking on board the variety of characteristics to determine an appropriate zoning and development outcome.

The Request achieves the sustainable management purpose of the RMA by enabling appropriate activities and development, and accordingly social and economic well-being, in a manner that: sustains the potential of the natural and physical resources of the site and the wider Wakatipu Basin, for future generations; will continue to safeguard the life-supporting capacity of air, water, soil, and ecosystems; and will avoid or mitigate potential adverse effects including effects on landscape and visual amenity values.

3 Section 32(1)(b) & 32(1)(c): examining the provisions of the proposal in achieving the objectives

Section 32(1)(b) requires an examination as to whether the provisions of the proposal are the most appropriate way to achieve the objectives, by identifying other reasonably practicable options for achieving the objectives and assessing the efficiency and effectiveness of the provisions in achieving the objectives.

Section 32(1)(c) states that the evaluation must contain a level of detail that corresponds to the scale and significance of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the proposal.

Section 32(2)(a) requirement that the assessment must identify and assess the benefits and costs of the environmental, economic, social and cultural effects anticipated from implementation of the provisions.

These evaluations are set out below.

3.1 Provisions of the Request

The proposed provisions within the Request are as follows:

- a) To rezone the Site from the ODP ASSZ to the PDP SRZ so as to enable low density residential subdivision and development in certain areas of the Site. The Site would be removed from the ODP and placed within the PDP.
- b) To promote a BRA on the Site that prevents the land affected by the BRA from being developed for residential purposes.
- c) To move the ODP and PDP UGB in a southerly direction so as to accommodate the proposed rezoning. The UGB will be moved to the southern boundary of the Site.

- d) The introduction of new policy provisions within Chapter 27 (Subdivision and Development) of the PDP which will manage bespoke considerations for the Site.
- e) Update Figure 1 in Chapter 4 of the PDP to cater for the Request.

Points (a) to (d) above will involve amending the PDP web mapping system to cater for updated 'planning maps'. Point (d) will involve adding a new objective and supporting policy under Provision 27.3 in Chapter 27 of the PDP. It would also be prudent to provide a demarcation on the PDP planning map that indicates the area of the SRZ that adjoins McDonnell Road that will be subject to the proposed policy provisions (to distinguish the Site from the remainder of the PDP SRZ). This is a common mapping tool within the PDP.

As outlined above, the proposed policy framework for the Site is detailed below:

McDonnell Road Suburban Residential Zone

Objective 27.X.X.X *High quality low density residential subdivision and development is enabled, while appropriately providing for amenity, mitigation and riparian plantings, together with controlling access onto McDonnell Road.*

Policies

- 27.X.X.X** *Require a 4.5m planting strip along the McDonnell Road frontage (excluding any primary vehicular access point(s)) and a 5m planting strip along the southern boundary of the zone.*
- 27.X.X.X** *Maintain existing riparian planting along the waterbody that flows through the zone.*
- 27.X.X.X.** *To provide on-going management of plantings, weed and pest control for any privately owned communal land.*
- 27.X.X.X** *Avoid private fencing over 1.2m on boundaries of residential lots that adjoin a Council reserve containing a waterbody, the southern boundary of the zone and for any residential lot boundaries that adjoin a legal road.*

27.X.X.X *To require the identification of the Building Restriction Area at the time of subdivision within the zone.*

27.X.X.X *Avoid private vehicle crossings (and access) onto McDonnell Road from residential lots that adjoin this road.*

Aside from the PDP mapping changes, the insertion of the bespoke policy provisions into the Chapter 27 of the PDP and amending Figure 1 in Chapter 4 of the PDP, it is considered that no other changes are required to the PDP.

The new policy provisions can be implemented via Rule 27.5.7 that deals with urban subdivision within the District (no changes to Rule 27.5.7 is required).

Table 1 below sets out a high-level overview of the evaluation required under section 32(1)(b) (appropriateness, efficiency and effectiveness of the provisions for achieving the objectives, and identifying other reasonably practicable options for achieving the objectives); and the evaluation required under section 32(2)(a) (costs and benefits of the provisions). The 'provisions' to be evaluated are the new zoning regime which include PDP mapping changes and the addition of the bespoke objective and policy within Chapter 27 of the PDP.

Costs	Benefits	Efficiency, effectiveness and appropriateness
The rezoning to the PDP SRZ will have the following costs: - Costs to APL for the drafting of the private plan change request and supporting reports; - Costs to APL for funding the Council-appointed independent	The rezoning to the PDP SRZ will have the following benefits: - The rezoning of the Site will provide certainty as to the residential development outcomes for the Site, while at the same time, protecting certain	The rezoning to the PDP SRZ (including the bespoke provisions) will have the following benefits: - The SRZ is a modern and the most commonplace low density residential zone in the District.

consultants or internal planning staff to process the private plan change; - Potential costs to the community in participating in the plan change process. - Potential QLDC costs in terms of network infrastructure upgrades (potentially reduced with development contributions from the developer). - Loss of the present open space in a portion of the site. - Potential effects on landscape and residential amenity values in the vicinity of the Site. The bespoke policy provisions will have the following costs: - Additional land use restrictions for residential lots when compared to the standard development controls in the SRZ.	areas of the Site from residential development. - The rezoning will provide a logical extension to the SRZ in Arrowtown. - The Site is easily accessible and can connect to reticulated infrastructure (with minor upgrades), future residential development can be serviced to Council requirements. - Development contributions at the time of subdivision will assist with Council infrastructure upgrades. - Provides benefits to future residents from the expanded number of residential properties in Arrowtown that could be established under the provisions, in a desirable location, and thereby generates social wellbeing for the residents and wider community; - Provides benefits from the increased employment arising from the subdivision works and from future construction works on the new residential sites created, and the contribution that new households will make to the local and district economy;	Subdividing and developing within the SRZ in terms of - The proposed provisions are the most appropriate, effective and efficient way to achieve the objective of the Request. - The provisions are appropriate for achieving the objectives and the proposal and, hence, the purpose of the RMA
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	- Increased biodiversity values arising from the requirement to undertake indigenous planting. The bespoke policy provisions will have the following benefits: - Providing certainty during the subdivision consenting process as to the specific considerations to be addressed for the Site. - Quality aesthetic outcomes via the continuation of the 4.5m planting strip along McDonnell Road, together with restricting private vehicle access to this road. - The requirement for planting on the southern boundary which will assist in demarcating the Site. - Maintenance and enhancement of the waterbody that flows through the Site. - Avoiding dominant fencing on residential lot boundaries that adjoin a Council reserve that contains the waterbody, together with residential lots that adjoin the southern boundary of the Site.	
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Table 1

The optimal approach is the rezoning as proposed in the Request so as to enable a portion of the site to be developed for low density residential purposes, while safeguarding the sensitive areas within the Site from residential development.

4 The risk of acting or not acting

Section 32(2)(c) requires an evaluation of the risk of acting and risk of not acting if there is uncertain or insufficient information about the subject matter of these provisions.

There is no risk of acting (i.e. proceeding with this Request) as it is considered that no such uncertainty or insufficiency exists. In the case of infrastructure servicing of the Site, it has been confirmed that with an appropriate wastewater upgrade (and future lot controls/requirements), that there are no infrastructure risks associated with the Request.

The risk in not acting will mean the opportunity for expanded residential capacity in this part of Arrowtown is likely to be lost or delayed and the benefits arising from that expanded capacity, and the efficiency and effectiveness of the provisions will be lost.

5 Evaluation of the provisions under the relevant District Plan objectives

For the purposes of section 32(3) the proposal is an amending proposal because it will amend the ASSZ as contained in the ODP and also amend the partially operative PDP.

Where a proposal will amend a plan that already exists, the examination under section 32(1)(b) must relate to the provisions of the proposal and the existing ODP and PDP (where operative) objectives to the extent that those objectives are relevant and would remain if the amending proposal were to take effect.

The amending proposal does not seek to change any specific ODP objectives; all objectives will remain if the amending proposal takes effect. It is noted that bespoke policy provisions are proposed to be added to Chapter 27 of the PDP.

The examination must therefore address how the provisions of the proposal achieve the relevant ODP's and PDP objectives.

Operative District Plan

The ODP sets out the Strategic Direction for the District through District-Wide Objectives in Chapter 4. These objectives are then expanded on through policies in the remaining chapters of the ODP.

The relevant ODP objectives are contained within the following Chapters:

- a) Chapter 4 (District Wide)
- b) Chapter 12 (ASSZ)

These ODP chapters are addressed below.

Chapter 4 (District Wide)

Chapter 4 of the ODP provides an explanation of the structure of the District Plan including the application of the strategic chapters of the District Plan applying across the District.

Part 4.9 within Chapter 4 deals with Urban Growth. The following objectives within Chapter 4 are applicable to the Request:

- a) Objective 2: Existing Urban Areas and Communities.
- b) Objective 3: Provision for residential growth sufficient to meet the District's needs.
- c) Objective 9: Sustainable Management of Development.

Notwithstanding the fact that the relevant PDP higher order policy provisions are now deemed operative, the following is noted in relation to Objectives 2, 3 and 9 in Chapter 4 of the ODP:

- a) The Request will enable new residential growth to occur that will have regard to the built character and amenity values of the immediate and wider area.

- b) The request will enable for low density residential development in an appropriate area which will generally maintain the existing residential character in this area;
- c) The Request is not a sporadic or ad hoc urban development.
- d) The movement of the UGB as proposed will not create adverse effects on the character and identity of Arrowtown.
- e) Future residential development on the Site will be sympathetic to the character of Arrowtown in terms of scale, density, layout and legibility.

Overall, the Request has consistency with the relevant provisions within Chapter 4.

Chapter 12 - ASSZ

The document titled Private Plan Change Request outlines the background to the creation of the ASSZ and the specific provisions that relate to the Site. Development within the ASSZ is controlled through the Arrowsouth Structure Plan (**ASP**). The purpose of the ASP is to ensure that the ASSZ is developed in a comprehensive manner which ensures a high quality outcome for the Arrowtown community.

The Site is affected by the following activity areas from the ASP:

- Residential Activity Area
- Private Open Space Activity Area: Escarpment Area 1
- Private Open Space Activity Area: Pastoral Area 3
- Private Open Space Activity Area: Watercourse Area 1

- Private Open Space Activity Area: Escarpment Area 3

The additional residential subdivision and development of the Site as proposed within the Request is clearly not anticipated within the ASSZ. In the area of the Site where further residential development is proposed, the planning status under the ODP would either be non-complying or prohibited.

The Request is generally not consistent with the relevant policy provisions within the ASSZ, however, future development will be avoided within the sensitive areas of the Site (which is a key theme within the ASSZ).

If the continuation of the existing open space with the Site is the desired goal, then the maintenance of the ASSZ should prevail. However, excluding the sensitive land where development will be avoided due to the use of the BRA's, the Site provides an excellent opportunity to accommodate appropriate low density residential development which takes advantage of adjoining the same form of development, connections (vehicular and active travel) and existing infrastructure services (with upgrades).

Further, and importantly, the Request will provide the catalyst to supply a large number of residential sections in the context of the Arrowtown urban environment. The HBCA Peer Review states that the rezoning the Site will enable up to 44 residential sections to be created, which in turn provides a practical and effective means of increasing housing supply in Arrowtown where little capacity currently exists. The HBCA Peer Review concludes that the rezoning would make a meaningful contribution toward meeting identified housing needs in Arrowtown.

The positive attributes of the Request mean that the maintenance of the ASSZ (and in particular open space requirements) on the Site is longer appropriate, as the Site can accommodate appropriate low density residential development as proposed.

Proposed District Plan

Part Three of the PDP which is operative sets out the strategy approach for the District. Chapter 3 (Strategic Direction) within the PDP sets out the over-arching strategic direction for the management of growth, land use and development in a manner that ensures sustainable management of the District's special qualities. Chapter 4 (Urban Development) which is also operative elaborates on Chapter 3 and sets out the objectives and policies for managing the spatial location and layout of urban development within the District.

The evaluation of the relevant PDP objectives are addressed in **Table 2**.

Objective	Assessment
Chapter 3 – Strategic Direction	
3.2.2: Strategic Objective Urban growth is managed in a strategic and integrated manner. 3.2.2.1 Urban development occurs in a logical manner so as to: a. promote a compact, well designed and integrated urban form; b. build on historical urban settlement patterns; c. achieve a built environment that provides desirable, healthy and safe places to live, work and play; d. minimise the natural hazard risk, taking into account the predicted effects of climate change; e. protect the District's rural landscapes from sporadic and sprawling urban development; f. ensure a mix of housing opportunities including access to housing that is more affordable for residents to live in; g. contain a high quality network of open spaces and community facilities; and h. be integrated with existing, and proposed infrastructure and appropriately manage effects on that infrastructure.	The Request represents logical extension of the existing Arrowtown urban area. The Request will not represent sporadic (unconnected) or sprawling urban development, and its location allows integration with existing residential development and infrastructure. The Request will build upon the current urban settlement of Arrowtown. Given the connectivity available along with natural features of the site, the outcome for future residents will be a desirable, healthy and safe place to live. There are no natural hazards that would prevent the residential development of the Site. The SRZ will provide for land which provides a potential mix of housing opportunities (residential flats, detached dwellings or townhouses). The Site integrates well with existing infrastructure (with minor upgrades being required).

3.2.3 Strategic Objective A quality built environment taking into account the character of individual communities. 3.2.3.1 The District's important historic heritage values are protected by ensuring development is sympathetic to those values. 3.2.3.2 Built form integrates well with its surrounding urban environment.	The future residential development of the site will have no adverse effects on the historic values of Arrowtown. The proposed zoning SRZ will mean that the resulting built form will integrate well with its surrounding urban environment, with this same zoning located to the north and east of the site, at its urban edges.
3.2.4 Strategic Objective The distinctive natural environments and ecosystems of the District are protected 3.2.4.3 The natural character of the beds and margins of the District's lakes, rivers and wetlands is preserved, or enhanced where possible, and protected from inappropriate subdivision, use and development. 3.2.4.4 The water quality and functions of the District's lakes, rivers and wetlands are maintained or enhanced.	Mechanisms through the resource consent process will ensure that the watercourse running through the site will be protected and enhanced, in particular with the proposed bespoke policy provisions that will require further indigenous plantings within the site.
3.3.14 Strategic Policy 3.3.14 Apply Urban Growth Boundaries (UGBs) around the urban areas in the Wakatipu Basin (including Queenstown, Frankton, Jack's Point and Arrowtown), Wānaka and where required around other settlements.	An UGB is in place, and it is proposed that as part of the Request that the UGB is adjusted to incorporate the proposed SRZ. This will ensure that the UGB continues to encapsulate the urban areas of Arrowtown.

3.3.15 Apply provisions that enable urban development within the UGBs and avoid urban development outside of the UGBs	As the policy seeks to avoid urban development outside of UGBs, it is necessary that the UGB be also addressed to align with the rezoning of the Site as proposed in this Request.
Strategic Policies 3.3.49 Avoid significant adverse effects on wāhi tūpuna within the District. 3.3.50 Avoid remedy or mitigate other adverse effects on wāhi tūpuna within the District 3.3.51 Manage wāhi tūpuna within the District, including taonga species and habitats, in a culturally appropriate manner through early consultation and involvement of relevant iwi or hapū	While the Site is not located within an identified Wāhi Tupuna Overlay, engagement with iwi will occur through the Request and any future resource consent process to subdivide the site in in terms of protecting and enhancing ecological values.

Objective	Assessment
Chapter 4 – Urban Development	
4.2.1 Objective Urban Growth Boundaries used as a tool to manage the growth of urban areas within distinct and defendable urban edges	It is recognised that UGBs are a tool promoted by the PDP to manage the growth of urban areas seeking distinct and defendable urban edges, and that an Arrowtown UGB is currently in place which does not include the full Site.

Policies 4.2.1.1 Define Urban Growth Boundaries, where required, to identify the areas that are available for the growth of urban settlements 4.2.1.2 Focus urban development primarily on land within and adjacent to the existing larger urban areas and, to a lesser extent, within and adjacent to smaller urban areas, towns and rural settlements 4.2.1.3 Ensure that urban development is contained within the defined Urban Growth Boundaries, and that aside from urban development within existing towns and rural settlements, urban development is avoided outside of those boundaries 4.2.1.4 Ensure Urban Growth Boundaries encompass, at a minimum, sufficient, feasible development capacity and urban development opportunities consistent with a) the anticipated medium-term demand for housing and business land within the District assuming a mix of housing densities and form b) ensuring the ongoing availability of a competitive land supply for urban purposes c) the constraints on development of the land such as its topography, its ecological, heritage, cultural or	The Request seeks rezone the Site to the SRZ, while moving the existing UGB so as to include all of the Site. The Site is located directly adjacent to an existing urban area (on two boundaries). The movement of UGBs to provide for future growth / urban areas is contemplated within the PDP provisions, with specific policies below providing guidance on considerations for moving an UGB. Adjusting the UGB to encompass the site will give effect to this policy, by providing for feasible (and reasonably expected to be realised) development capacity and the opportunity for urban development. The Request will be able to supply additional sections in a competitive market as outlined in the HBCA Peer Review. While the Site has certain constraints, such do not inhibit the ability to provide additional residential sections for the Arrowtown urban area.
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landscape significance; or the risk of natural hazards limiting the ability of the land to accommodate growth d) the need to make provision for the location and efficient operation of infrastructure, commercial and industrial uses, and a range of community activities and facilities e) a compact and efficient urban form f) avoiding sporadic urban development in rural areas g) minimising the loss of the productive potential and soil resource of rural land; and h) a future development strategy for the District that is prepared in accordance with the National Policy Statement on Urban Development Capacity 4.2.1.5 When locating Urban Growth Boundaries or extending towns and rural urban settlements through plan changes, protect the values of Outstanding Natural Features and Outstanding Natural Landscapes 4.2.1.6 When locating Urban Growth Boundaries or extending towns and rural settlements through plan changes to provide for urban development, have particular regard to minimising significant adverse effects on the values of open rural landscapes	The rezoning of the Site, given its location, will contribute to a compact and efficient urban environment in Arrowtown. Developing the site via the SRZ will not lead to a sporadic urban development in a rural setting. Rather, the rezoning to SRZ will fill the 'missing tooth' zoning wise in the south-west corner of the urban area of Arrowtown. There will be no loss of productive rural land. The Request has considered the NPS-UD (as addressed below). The proposed movement of the UGB to encompass the Site will have no impact on any Outstanding Natural Feature or Landscape. The proposed UGB to encompass the site will be located in a position such that no open rural landscape, including views to any rural landscapes will be significantly affected.
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4.2.1.7 Review and amend Urban Growth Boundaries as required, to address changing community needs, respond to monitoring evidence, or to enable appropriate urban development (having regard to Policy 4.2.1.4)	The proposal is considered to represent appropriate urban development, which in turn justifies the movement of the existing UGB.
4.2.2 A Objective A compact, integrated and well-designed urban form within the Urban Growth Boundaries that: - is coordinated with the efficient provision, use and operation of infrastructure and services; and - is managed to ensure that the Queenstown Airport is not significantly compromised by the adverse effects of incompatible activities. Policies: 4.2.2.2 Allocate land within Urban Growth Boundaries into zones which are reflective of the appropriate land use having regard to a. its topography; b. its ecological, heritage, cultural or landscape significance if any;	With the movement of the UGB, the Request will contribute to the compact urban form in Arrowtown, while at the same time, co-ordinating with existing infrastructure and services. The Request will have no effect on the operations of Queenstown Airport. The following is noted in relation to the Request: - The topography of the Site has been clearly recognised in terms of where future development can occur and where it should be avoided. - Ecological considerations can be dealt with through a future consenting process. - Natural hazards have been considered and do not affect future development on the Site.

c. any risk of natural hazards, taking into account the effects of climate change; d. connectivity and integration with existing urban development; e. convenient linkages with public transport; f. the need to provide a mix of housing densities and forms within a compact and integrated urban environment; g. the level of existing and future amenity that is sought (including consideration of any identified special character areas); h. the need to make provision for the location and efficient operation of infrastructure and utilities, including regionally significant infrastructure; i. the need to provide open spaces and community facilities that are located and designed to be safe, desirable and accessible; j. the function and role of the town centres and other commercial and industrial areas as provided for in Chapter 3 Strategic Objectives 3.2.1.2 - 3.2.1.5 and associated policies; and k. the need to locate emergency services at strategic locations 4.2.2.3 Enable an increased density of well-designed residential development in close proximity to town centres,	- The Site easily connects with existing urban development via private vehicles, public and active transport. - The SRZ can provide a variety of housing choices for future owners that can easily integrate into the existing urban environment. - The standards within the SRZ are well accepted in terms of providing meaningful amenity for future residents. - With minor upgrades, existing infrastructure can service the future development within the Site. - Open spaces will be available within the site via the use of the BRA's.
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public transport routes, community and education facilities, while ensuring development is consistent with any structure plan for the area and responds to the character of its site, the street, open space and surrounding area	The Request will enable an increased density of well-designed residential development within the Site. While located at the southern end of Arrowtown, it has been assessed to be sufficient proximity to public transport routes, active transport connections, and access to education and community facilities. The Request is considered to respond to the character of the site, McDonnell Road and the open space features of the site.
4.2.2.4 Encourage urban development that enhances connections to public recreation facilities, reserves, open space and active transport networks	The assessment has identified that the urban development facilitated by the Request will retain existing connections. The active transport link to the east, along with the recreational amenity provided within the site by trails will be maintained.
4.2.2.12 Define the Urban Growth Boundary for Arrowtown, as shown on the District Plan web mapping application that preserves the existing urban character of Arrowtown and avoids urban sprawl into the adjacent rural areas	The proposed adjustment to the UGB is considered to meet this policy where it will continue to uphold the existing urban character of Arrowtown through density, retention of landscape elements and integration with the existing urban form pattern that extends along McDonnell Road. The proposal will not represent urban sprawl given its location in this corner of the existing urban form of Arrowtown and does not extend to any adjacent rural zones.
4.2.2.19 Ensure that development within the Arrowtown Urban Growth Boundary provides:	Development within the Site will be subject to the same scale, density and layout controls as all existing SRZ zoned land in Arrowtown, including guidance in the planning

a. an urban form that is sympathetic to the character of Arrowtown, including its scale, density, layout and legibility, guided by the Arrowtown Design Guidelines 2016; b. opportunity for sensitively designed medium density infill development in a contained area closer to the town centre, so as to provide more housing diversity and choice and to help reduce future pressure for urban development adjacent or close to Arrowtown's Urban Growth Boundary; c. a designed urban edge with landscaped gateways that promote or enhance the containment of the town within the landscape, where the development abuts the urban boundary for Arrowtown; d. recognition of the importance of the open space pattern that is created by the inter-connections between the golf courses and other Rural Zone land.	process where necessary to the Arrowtown Design Guidelines (if applicable). The proposed incorporation of the BRA's and existing watercourse planting spaces is considered to facilitate a layout and character that is aligned with the low scale type development. The proposal is not in proximity to the town centre of Arrowtown and does not propose MDR zoning. Proposed PDP policy provisions are proposed which will continue a landscape theme along McDonnell Road and within waterway on the Site.
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Objective	Assessment
Chapter 27 - Subdivision & Development	
Objective 27.2.2 Subdivision design achieves benefits for the subdivider, future residents and the community. Policies 27.2.2.1 Ensure subdivision design in urban areas provides a high level of amenity for future residents by aligning roads and allotments to maximise sunlight access. 27.2.2.3 Locate open spaces and reserves in appropriate locations having regard to topography, accessibility, use and ease of maintenance, while ensuring these areas are a practicable size for their intended use. 27.2.2.4 Urban subdivision shall seek to provide for good and integrated connections and accessibility to: a. existing and planned areas of employment; b. community facilities; c. services; d. trails; e. public transport; and	The Request will enable future benefits for a variety of parties through the construction of further residential development and appropriate minor extension of Arrowtown. Future development within the Site will be controlled through the SRZ standards, which in turn will provide for a high level of amenity for future residents. Areas within the Site that are not suitable for residential development will contribute to open spaces within the subdivision. The Site has a good level of accessibility for all modes of transportation.

f. existing and planned adjoining neighbourhoods, both within and adjoining the subdivision area. 27.2.2.5 Urban subdivision design will integrate neighbourhoods by creating and utilising connections that are easy and safe to use for pedestrians and cyclists and that reduce vehicle dependence within the subdivision. 27.2.2.6 Encourage innovative subdivision design that responds to the local context, climate, landforms and opportunities for views or shelter.	The existing trail through the Site provides an connection for pedestrians and cyclists into existing residential development located to the east of the Site. While the subdivision concept plans included in the Request are conceptual, the topography of the Site and the use of the BRA's will dictate where future lots will be created.
Objective 27.2.4 Natural features, indigenous biodiversity and heritage values are identified, incorporated and enhanced within subdivision design. Policies 27.2.4.1: Incorporate existing and planned waterways and vegetation into the design of subdivision, transport corridors and open spaces where that will maintain or enhance biodiversity, riparian and amenity values.	The waterbody that flows through the Site could be further enhanced by riparian plantings, which in turn will enhance biodiversity and amenity values.

Objective 27.2.5 Infrastructure and services are provided to new subdivisions and developments. Policies: - Roading 27.2.5.1: Integrate subdivision roading with the existing road networks in a safe and efficient manner that reflects expected traffic levels and the provision for safe and convenient walking and cycling. 27.2.5.2: Ensure safe and efficient pedestrian, cycle and vehicular access is provided to all lots created by subdivision and to all developments. 27.2.5.4: Ensure the physical and visual effects of subdivision and roading are minimised by utilising existing topographical features. 27.2.5.5: Ensure appropriate design and amenity associated with roading, vehicle access ways, trails and trail connections, walkways and cycle ways are provided for within subdivisions by having regard to: a) the location, alignment, gradients and pattern of roading, vehicle parking, service lanes, access to lots, trails, walkways and cycle ways, and their safety and efficiency;	The Request will provide for safe and efficient transport infrastructure in terms of the connection with McDonnell Road, while an existing active transport route exists through the site.
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- b) the number, location, provision and gradients of access ways and crossings from roads to lots for vehicles, cycles and pedestrians, and their safety and efficiency;
- c) the standard of construction and formation of roads, private access ways, vehicle crossings, service lanes, walkways, cycle ways and trails;
- d) the provision and vesting of corner splays or rounding at road intersections;
- e) the provision for and standard of street lighting, having particular regard to siting and location, the provision for public safety and the avoidance of upward light spill adversely affecting views of the night sky;
- f) the provision of appropriate tree planting within roads in urban areas;
- g) any requirements for widening, formation or upgrading of existing roads;
- h) any provisions relating to access for future subdivision on adjoining land;
- i) the provision and location of public transport routes and bus shelters in urban areas.

Policies: Water Supply, Stormwater, Wastewater

27.2.5.6: All new lots shall be provided with connections to a reticulated water supply, stormwater disposal and/or sewage treatment and disposal system, where such systems are available or should be provided for.

27.2.5.7: Ensure water supplies are of a sufficient capacity, including fire fighting requirements, and of a

Information supplied with the Request confirms that the future residential subdivision and development of the Site can be supplied with infrastructure servicing that can meet the PDP and QLDC Code of Practice. The specific details in terms of servicing can be addressed through the future resource consent process.

potable standard, for the anticipated land uses on each lot or development.

27.2.5.8: Encourage the efficient and sustainable use of potable water by acknowledging that the Council's reticulated potable water supply may be restricted to provide primarily for households' living and sanitation needs and that water supply for activities such as irrigation and gardening may be expected to be obtained from other sources.

27.2.5.10: Ensure appropriate water supply, design and installation by having regard to:

- a) the availability, quantity, quality and security of the supply of water to the lots being created;
- b) water supplies for fire fighting purposes;
- c) the standard of water supply systems installed in subdivisions, and the adequacy of existing supply systems outside the subdivision;
- d) any initiatives proposed to reduce water demand and water use.

27.2.5.11: Ensure appropriate stormwater design and management by having regard to:

- a) any viable alternative designs for stormwater management that minimise run-off and recognises

stormwater as a resource through re-use in open space and landscape areas;

- b) the capacity of existing and proposed stormwater systems;
- c) the method, design and construction of the stormwater collection, reticulation and disposal systems, including connections to public reticulated stormwater systems;
- d) the location, scale and construction of stormwater infrastructure;
- e) the effectiveness of any methods proposed for the collection, reticulation and disposal of stormwater run-off, including opportunities to maintain and enhance water quality through the control of water-borne contaminants, litter and sediments, and the control of peak flow.

27.2.5.12: Encourage subdivision design that includes the joint use of stormwater and flood management networks with open spaces and pedestrian/cycling transport corridors and recreational opportunities where these opportunities arise and will maintain the natural character and ecological values of wetlands and waterways.

27.2.5.14: Ensure appropriate sewage treatment and disposal by having regard to:

- a) the method of sewage treatment and disposal;
- b) the capacity of, and impacts on, the existing reticulated sewage treatment and disposal system;
- c) the location, capacity, construction and environmental effects of the proposed sewage treatment and disposal system.

27.2.5.15: Ensure that the design and provision of any necessary infrastructure at the time of subdivision takes into account the requirements of future development on land in the vicinity.

27.2.5.16: Ensure adequate provision is made for the supply and installation of reticulated energy, including street lighting, and communication facilities for the anticipated land uses while:

- d) providing flexibility to cater for advances in telecommunication and computer media technology, particularly in remote locations;
- e) ensure the method of reticulation is appropriate for the visual amenity and landscape values of the area by generally requiring services are underground, and in the context of rural environments where this may not be practicable, infrastructure is sited in a manner that minimises visual effects on the receiving environment;
- f) generally require connections to electricity supply and telecommunications systems to the boundary

of the net area of the lot, other than lots for access, roads, utilities and reserves.	
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Objective	Assessment
Chapter 28 – Natural Hazards	
Objectives 28.3.1.A The risk to people and the built environment posed by natural hazards is managed to a level tolerable to the community. 28.3.1.B Development on land subject to natural hazards only occurs where the risks to the community and the built environment are appropriately managed. Policies: 28.3.1.3: Development on land subject to natural hazards only occurs where the risks to the community and the built environment are appropriately managed.	Information supplied within the Request confirms that the Site can be developed as proposed without being unduly affected by natural hazards.

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| <ul style="list-style-type: none"> a. the likelihood of the natural hazard event occurring over no less than a 100 year period; b. the type and scale of the natural hazard and the effects of a natural hazard on the subject land, and proposed activity or development; c. the effects of multiple and cascading hazards; d. the effects of climate change on the likelihood and scale of the natural hazard; e. the potential for the activity to exacerbate the natural hazard risk both within and beyond the subject land; f. the location, design and construction of building and structures to mitigate the effects of natural hazards, such as the raising of floor levels, or relocation of buildings and structures; g. management techniques that avoid or manage natural hazard risk to a tolerable level, including with respect to ingress and egress of both residents and emergency services during a natural hazard event | |
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28.3.1.4: Avoid activities that result in significant risk from natural hazard. 28.3.1.6 Not preclude subdivision and development of land subject to natural hazards which do not: a) accelerate or worsen the natural hazard risk to an intolerable level; b) expose vulnerable activities to intolerable natural hazard risk; c) create an intolerable risk to human life; d) increase the natural hazard risk to other properties to an intolerable level; e) require additional works and costs including remedial and maintenance works, that would be borne by the public.	
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Objective	Assessment
Chapter 29 – Transport	
Objective 29.2.1 An integrated, safe, and efficient transport network that: a) provides for all transport modes and the transportation of freight; b) provides for future growth needs and facilitates continued economic development;	The future residential occupants of the Site will be able to use a variety of transportation methods, from private vehicles, public transportation and active transport.

- c) reduces dependency on private motor vehicles and promotes the use of shared, public, and active transport;
- d) contributes towards addressing the effects on climate change;
- e) reduces the dominance and congestion of vehicles, particularly in the Town Centre zones; and
- f) Enables the significant benefits arising from public walking and cycling trails.

Policies:

29.2.1.1: Require that transport networks including active transport networks, are well-connected and specifically designed to:

- a) enable an efficient public transport system;
- b) reduce travel distances and improve safety and convenience through discouraging single connection streets; and
- c) provide safe, attractive, and practical walking and cycling routes between and within residential areas, public facilities and amenities, and employment centres, and to existing and planned public transport.

6 Evaluation of the provisions under the relevant regional planning instruments

The District Plan must give effect to the operative Otago Regional Policy Statement and have regard to any Proposed Regional Policy Statements. The relevant provisions of the Regional Policy Statement 2021 are assessed in **Table 3** below.

Objective	Assessment
Otago Regional Policy Statement 2021	
MW-01 – Principles of Te Tiriti o Waitangi The principles of Te Tiriti o Waitangi are given effect in resource management processes and decisions, utilising a partnership approach between councils and papatipu rūnaka to ensure that what is valued by mana whenua is actively protected in the region.	The Request has incorporated bespoke planning provisions that will ensure enhanced biodiversity within and adjacent to the waterbody that flows through the site. Stormwater will be disposed of on site in an appropriate manner, while wastewater will connect to the QLDC's reticulated infrastructure.
LF-FW-P15 – Restoring natural character and instream values. Where the natural character or instream values of lakes and rivers or the natural character of their margins has been reduced or lost, promote actions that, where practicable:	The Request has incorporated bespoke planning provisions that will ensure enhanced biodiversity within and adjacent to the waterbody that flows through the site.

a) restore a form and function that reflect the natural behaviours of the water body, b) improve water quality or quantity where it is degraded, c) increase the presence, resilience and abundance of indigenous flora and fauna, including by providing for fish passage within river systems, and where necessary and appropriate, creating fish barriers to prevent incursions from undesirable species, d) improve water body margins by naturalising bank contours and establishing indigenous vegetation and habitat, and e) restore natural connectivity between and within water systems	
EIT-INF-01 Provision of Infrastructure Effective, efficient, safe and resilient infrastructure, nationally significant infrastructure and regionally significant infrastructure enables the people and communities to provide for their social and cultural well-being, their health and safety, and supports sustainable economic development and growth in the region.	The residential development of the Site can be catered for via existing reticulated infrastructure (with minor upgrades), while on-site stormwater disposal can occur in an appropriate manner. The Site can connect into the existing roading network, while an active trail that passes through the Site can be utilised.
UFD-01 Development of urban areas	The Request proposes an extension to the existing urban area of Arrowtown (and an extension to the UGB). The

is required to address a shortfall identified in accordance with UFD-P2, (3) achieves consolidated, well designed and sustainable development in and around existing urban areas, (4) is logically and appropriately staged, and will not result in inefficient or sporadic patterns of settlement and residential growth, (5) is integrated efficiently and effectively with development infrastructure and additional infrastructure in a strategic, timely and co-ordinated way, (6) addresses issues of concern to iwi and hapū, including those identified in any relevant iwi planning documents, (7) manages adverse effects on other values or resources identified by this RPS that require specific management or protection, (8) avoids, highly productive land except as provided for in the NPS-HPL, and considers adverse effects, particularly reverse sensitivity effects, on existing and anticipated primary production or rural industry activities when determining the location of the new urban/rural boundary.	
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Table 3

A District Plan must not be inconsistent with a Regional Plan. There is one relevant regional plan: the **Regional Plan: Water**. The Regional Plan: Water addresses the use, development and protection of the freshwater resources of the Otago region,

the beds and margins of water bodies, and the use, development and protection of those water resources. It provides objectives, policies rules and implementation to address the use and management of the water resources.

To the extent that this regional plan is relevant, the Change is not inconsistent with them because the amended provisions of the District Plan will continue to give effect to the regional plans.

7 Evaluation of the provisions under the national planning instruments

9.1 Overview

National Policy Statements (**NPS's**) provide objectives and policies for matters of national significance. All subsequent Resource Management documents, including regional policy statements, regional plans and district plans must give effect to (implement) any relevant NPS's.

The following NPSs have no applicability to the Request:

- The New Zealand Coastal Policy Statement
- The National Policy Statement for Renewable Electricity Generation
- The National Policy Statement on Electricity Transmission
- The National Policy Statement for greenhouse gas emissions from industrial process heat
- The National Policy Statement for Highly Productive Land
- National Policy Statement for Indigenous Biodiversity

The National Policy Statement for Freshwater Management has potential applicability to the requested Change. The stormwater from future residential development will be managed onsite and in accordance with all existing rules and codes of practice, and therefore there will be no adverse effects on the freshwater bodies

The National Policy Statement on Urban Development 2020 (**NPS-UD**) is relevant to this Change. The NPS-UD is relevant to the extent that Queenstown-Lakes is a “tier-2 authority” and has various obligations for improving housing affordability and supporting competitive land and development markets.

The NPS-UD requires all councils that have all or part of an urban environment within their district or region to plan well for growth and ensure a well-functioning urban environment for all people, communities, and future generations. This includes:

- a) Ensuring that plans make room for growth both ‘up’ and ‘out’, and that rules are not unnecessarily constraining growth;
- b) Developing, monitoring and maintaining an evidence base about demand, supply and prices for housing and land to inform planning decisions; and
- c) Aligning and coordinating planning across urban areas.

The NPS-UD is a directive document. It includes objectives and policies that councils must give effect to in their resource management decisions. The key relevant objectives of the NPS-UD are assessed in **Table 4** below.

Objective	Assessment
1 - New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future	The Request will contribute more land for residential development to meet the District's future needs and will enhance the well-functioning urban environment enabling more people to provide for their social, economic and cultural wellbeing

2 - Planning decisions improve housing affordability by supporting competitive land and development markets. 3 – Regional policy statements and district plans enable more people to live in, and more businesses and community services to be located in, areas of an urban environment in which one or more of the following apply: a) the area is in or near a centre zone or other area with many employment opportunities b) the area is well-serviced by existing or planned public transport c) there is high demand for housing or for business land in the area, relative to other areas within the urban environment.	The Request will significantly increase the supply of land for housing in the Arrowtown context and thereby improving market competition. The Request will enable more people to live in this area of Arrowtown (where there is high demand). While the existing Arrowtown urban area does not have high levels of employment opportunities, transport options including public transport are available to the wider district, there remains high demand for housing in Arrowtown, as per the finding of the HBCA Peer Review.
4 - New Zealand's urban environments, including their amenity values, develop and change over time in response to the diverse and changing needs of people, communities, and future generations	The development of the application site as an urban environment will result in a change in the existing character of the land and visual amenity values of some of the surrounding properties. The proposed development is however providing for the needs of the growing Arrowtown population whilst mitigating these potential adverse effects.

5 - Planning decisions relating to urban environments, and FDSs, take into account the principles of the Treaty of Waitangi (Te Tiriti o Waitangi). 6 - Local authority decisions on urban development that affect urban environments are: a. integrated with infrastructure planning and funding decisions; and b. strategic over the medium term and long term; and c. responsive, particularly in relation to proposals that would supply significant development capacity.	Matters that concern iwi will be taken into account during the resource consent process to subdivide and develop the Site. With minor upgrades, the existing QLDC infrastructure that will be relied upon can cater for the development of the Site.
8 - New Zealand's urban environments: support reductions in greenhouse gas emissions; and are resilient to the current and future effects of climate change.	The Site is generally well located so that future residents can take advantage of public transport.
Policy 1 - Planning decisions contribute to well-functioning urban environments, which are urban environments that, as a minimum: a. have or enable a variety of homes that: (i) meet the needs, in terms of type, price, and location, of different households; and (ii) enable Māori to express their cultural traditions and norms; and	The Request is considered to contribute to a well-functioning urban environment within the urban context of Arrowtown. The SRZ does provide for a variety of housing styles, including the provisions of ancillary residential flats. The location of Site means there is reasonable accessibility between the Site and employment locations, community services, public and active transport, and finally, open spaces.

b. have or enable a variety of sites that are suitable for different business sectors in terms of location and site size; and c. have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and d. support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and e. support reductions in greenhouse gas emissions; and are resilient to the likely current and future effects of climate change.	The approval of the Request will support the competitive operation of the limited Arrowtown greenfield land market. Arrowtown is geographically constrained and there is limited developable greenfield land left.
Policy 6: When making planning decisions that affect urban environments, decision-makers have particular regard to the following matters: a) the planned urban built form anticipated by those RMA planning documents that have given effect to this National Policy Statement b) that the planned urban built form in those RMA planning documents may involve significant changes to an area, and those changes i. may detract from amenity values appreciated by some people but improve amenity values appreciated by other people, communities,	The proposal is consistent with the objectives and outcomes identified for the Site as detailed within the PDP which was developed to be consistent with the direction of the NPS-UD. The Request will provide housing for the existing and future members of the community including for future generations. The development of the Site as an urban extension of the Arrowtown may detract from the existing character and visual amenity values of a number of property owners and occupiers within the area surrounding the subject site, however this is an expected effect when land is developed from farmland to urban land. Regardless, the

and future generations, including by providing increased and varied housing densities and types; and ii. are not, of themselves, an adverse effect c) the benefits of urban development that are consistent with well-functioning urban environments (as described in Policy 1) d) any relevant contribution that will be made to meeting the requirements of this National Policy Statement to provide or realise development capacity e) the likely current and future effects of climate change.	potential adverse effects of this change are mitigated through the factors contained in the Request. The Request is considered to be, and be part of a well-functioning environment. Development housing capacity in Arrowtown will be increased.
Policy 8 - Local authority decisions affecting urban environments are responsive to plan changes that would add significantly to development capacity and contribute to well-functioning urban environments, even if the development capacity is: a) unanticipated by RMA planning documents; or b) out-of-sequence with planned land release.	The Request will add significant housing capacity to the context of the Arrowtown urban area.
Policy 9 - Local authorities, in taking account of the principles of the Treaty of Waitangi (Te Tiriti o Waitangi) in relation to urban environments, must:	Discussions with Kā Rūnaka are anticipated with regard to ways that manawhenua values can be incorporated into the design of the development. These discussions are anticipated to occur during the resource consent process to subdivide the Site.

a) involve hapū and iwi in the preparation of RMA planning documents and any FDSs by undertaking effective consultation that is early, meaningful and, as far as practicable, in accordance with tikanga Māori; and b) when preparing RMA planning documents and FDSs, take into account the values and aspirations of hapū and iwi for urban development; and c) provide opportunities in appropriate circumstances for Māori involvement in decision-making on resource consents, designations, heritage orders, and water conservation orders, including in relation to sites of significance to Māori and issues of cultural significance; and d) operate in a way that is consistent with iwi participation legislation.	
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Table 4

8 Conclusions

The above evaluation has examined the Request under section 32 of the RMA. The broad conclusions from that evaluation are that:

- a) Under section 32(1)(a), the objectives of the Request are necessary and are the most appropriate way to achieve the purpose of the RMA, taking into account the existing higher order provisions of the District Plan and the relevant provisions of the regional and national planning instruments;
- b) The provisions are the most appropriate way to achieve the APL objectives, taking into account the expert reports,
- c) The provisions will be efficient and effective in achieving the objectives, taking into account their costs and benefits including the environmental, social and economic costs and benefits;
- d) There is no risk to acting.

Overall, for the reasons expressed above, and in the supporting reports including the assessment of effects on the environment, the Request will achieve the higher order objectives of the District Plan and the purpose and principles of the Act.