

09 April 2026

Arrowsouth Properties Limited
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Southern Planning Group
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9300

PRIVATE PLAN CHANGE REQUEST TO THE PROPOSED DISTRICT PLAN
THE ARROWTOWN SOUTH SPECIAL ZONE
REQUEST FOR FURTHER INFORMATION

Tēnā koe Scott,

This request for further information seeks to better understand the nature of the private plan change request in respect of the effect it will have on the environment, and how any potential effects are being managed. The information sought is considered to be appropriate to the actual or potential environmental effects anticipated from the implementation of the plan change request.

It has been made pursuant to Clause 23 of Schedule 1 of the RMA 1991, which outlines:

(1) Where a local authority receives a request from any person under [clause 21](#), it may within 20 working days, by written notice, require that person to provide further information necessary to enable the local authority to better understand—

(a) the nature of the request in respect of the effect it will have on the environment, including taking into account the provisions of [Schedule 4](#); or

(b) the ways in which any adverse effects may be mitigated; or

(c) the benefits and costs, the efficiency and effectiveness, and any possible alternatives to the request; or

(d) the nature of any consultation undertaken or required to be undertaken—

if such information is appropriate to the scale and significance of the actual or potential environmental effects anticipated from the implementation of the change or plan.

The Council has sought some comment on the proposal with the use of consultant experts to help inform the requests for information under cl 23 of the First Schedule. When expert input has been considered, it has been stated. No formal reports were commissioned in accordance with cl 23(3) of the First Schedule.

Site Access & Transport

A consultant expert assisted the Council with an initial assessment of the Transportation effects. These have been summarised below and have helped to inform the requests for further information in accordance with cl 23 of Schedule 1.

Summary of comments received from Transport Expert

It is noted the site access is currently in a location with an 80km/h speed limit. Additionally, there is a crest and bend in the road to the south of the access location that may limit sight distance. The speed limit may also lead to a need for shoulder widening or a right turn bay. Although some of these matters could be addressed in a subdivision consent, the Application Plans indicate this access location is reasonably set.

Other commentary on Transportation effects

Under the current provisions of the Arrowtown South Special Zone (ASSZ) the Zone Standards 12.32.5.2(xiii) provide specific limits for access onto both McDonnell Road and Centennial Avenue. This is in accordance with policy 12.31.4.1.2, which seeks to minimise the number of road crossings directly accessing Centennial Avenue and McDonnell Road.

A structure plan could be considered as a suitable option, which would mimic the pattern of the development in the existing ASSZ. A rule to this effect could be put in the provisions of Chapter 27 Subdivision and Development of the Proposed District Plan (PDP), with the structure plan showing the location of the internal road and could also restrict individual vehicle crossings off McDonnell Road & Centennial Avenue. It may also be beneficial to provide more certainty to landowners on Brodie Avenue, as to whether this road will become a through-road rather than a cul-de-sac.

Information requested pursuant to cl23(1)(a) of the First Schedule

1. The following requests for information are made:
 - a. Confirm the available sight distance to the south out of the access; and
 - b. Identify whether any shoulder widening or right turn bay would be required at this access; and
 - c. Advise if it anticipated that the 40km/h speed limit will be extended to encompass the proposed intersection (should the Plan Change be approved); and
 - d. Confirm whether the road frontage to McDonnell Road will be urbanised on the same side of the road as the site? This would include extension of the footpath to the site access.

Information requested pursuant to cl23(1)(c) of the First Schedule

2. Advise if the option of inserting a structure plan in PDP Chapter 27 is a more efficient method to provide greater certainty regarding the roading layout within the Site, and connectivity to the existing roading network (these connections are indicated on the subdivision concept plans provided with the Request but are not included in the proposed

provisions). This structure plan could also identify where individual vehicle crossings off McDonnell Road and Centennial Avenue are to be restricted.

Servicing

Within Section 4.5 of the Private Plan Change (PPC) Request, the requestor determined that it would be appropriate for the solution for servicing and infrastructure to be determined at the resource consent stage rather than at the PPC stage.

The Property and Infrastructure Team generally agrees with this except for wastewater, where Council is of the view that the necessary upgrade to the Waste Water Pump Station (WWPS) should be confirmed as feasible at the PPC stage. There may also be a need for additional emergency storage at the WWPS which may not be feasible due to the size of the designated area.

Additionally, Property and Infrastructure advised that the other infrastructure, including stormwater and water supply could be determined at the resource consent and Engineering Acceptance stage.

Information requested pursuant to cl23(1)(b) of the First Schedule

3. Provide information demonstrating that feasible engineering solutions are available for the upgrade to the WWPS, and additional emergency storage, to service the development outcomes enabled by the proposal.

Landscape - Riparian Planting, McDonnell Road/UGB Boundary treatment

A consultant expert assisted the Council with an initial assessment of the Landscape effects. These have been summarised below and have helped to inform the requests for further information in accordance with Cl 23 of Schedule 1.

The Landscape Assessment Report within Appendices K[1] and K[2] comments that the plan change anticipates planting along the McDonnell Road frontage and the Indicative Masterplan signals a planting width of 4.5m. It is understood that the purpose of this planting is to assist the integration of the new urban development in views from McDonnell Road, and in terms of its relationship to the rural and resort zoned land on the western side of McDonnell Road.

Summary of comments received from Landscape Expert

The peer review comments that the plan change anticipates a 7m riparian planting width on either side of the creek and includes indicative Sections, showing only one side of the creek planted to a width of 7m, with the riparian planting width on the other side of the creek reduced to 5m. However, these anticipated outcomes have not been included in the proposed provisions. It is also noted that it is commonplace in other districts (e. g. Auckland), for riparian planting widths in urban areas to be a minimum of 10m width to achieve a meaningful ecological and landscape function/benefit and accommodate a trail.

The Landscape Assessment Report comments that the plan change anticipates planting along the south boundary adjoining the ASSZ land and the Indicative Masterplan signals a planting width of 5.0m. It is understood that the purpose of this planting is to assist the integration of the new urban development in views from the adjacent land and to create a defensible edge.

The PPC Request (Page 22) advises the proposed amendments to Chapter 27 in this regard which are as follows:

McDonnell Road – Suburban Residential Zone

Objective 27.X.X.X Subdivision that achieves a high quality outcome in terms of indigenous planting and riparian enhancement.

Policy 27.X.X.X To require native planting strips along the McDonnell Road frontage, waterbodies and along the southern boundary of the land.

The PPC Request goes on to advise that it would be prudent for these matters to be shown on the plan maps but does not provide any proposed mapping in this regard.

A structure plan within PDP Chapter 27 could show the location of boundary planting along McDonnell Road and along the margins of the waterbody.

Information requested pursuant to cl23(1)(a) of the First Schedule

4. Provide expert advice and technical reasons in support of the proposed 7m (5m) riparian planting widths as to achieve a meaningful ecological and landscape function/benefit and accommodate a trail.

Information requested pursuant to cl23(1)(c) of the First Schedule

5. The following requests for information are made:
 - a. Advise if the bespoke provisions referred to in the PPC Request will be amended to identify specific riparian planting width requirements (as relied on in the Landscape Assessment Report) in PDP Chapter 27 and on the plan maps or a structure plan inserted in Chapter 27; and
 - b. Advise if bespoke provisions can identify specific planting width and performance outcome requirements in Chapter 27 and on the plan maps or on a structure plan inserted in Chapter 27 to achieve the intended landscape mitigation outcome and the technical reasons in support of any such specific planting width/performance outcomes; and
 - c. Advise if bespoke provisions in relation to the riparian plantings will be required to achieve appropriate CPTED outcomes (along with the ecological and landscape functions/benefits alluded to above). For example, fencing controls in relation to lots backing onto the riparian corridor; and
 - d. Advise if bespoke treatment should be expanded to address fencing controls along the McDonnell Road, southern boundary & Urban Growth Boundary to ensure an appropriate road frontage/rural zone interface. If so, please clarify the intended controls and how they would be incorporated into the PDP. If not, please explain why this is considered unnecessary; and

- e. Advise if a structure plan and any accompanying rules within the SRZ Chapter 7, should be included in PDP Chapter 27, to spatially identify the Building Restriction Areas, fencing controls, and planting strips alongside the waterbody and McDonnell Road.

Landscape – Other

Summary of comments received from Landscape Expert

The Landscape Assessment Report, the PPC Request and the s32 Report do not consider potential adverse effects on the adjacent rural living and residential properties on McDonnell Road. They also do not consider the appropriateness of the proposed 450m² and 300m² lot size strategies from a landscape perspective, nor do the bespoke provisions referred to generally in the s32 Report provide clarity as to which density is considered by the requestor to be the most appropriate density.

Under the current ASSZ provisions (rule 12.32.3.6(ii)), buildings and any other structures (except for pest-control fencing) are a prohibited activity in the activity areas POS-P2 and POS-P3.

The PPC Request suggests that the proposed Building Restriction Areas (BRAs) could be BRA or Open Space Nature Conservation Zoning. It does not consider any other options for an alternative Open Space Sub Zoning.

The Landscape Assessment Report advises that the development enabled by the plan change will adhere to the Arrowtown Design Guidelines. This is not reflected in the PPC Request nor the s32 Report or proposed provisions.

There is no consideration of the potential cumulative effects, from a landscape perspective, with respect to the Private Plan Change 1: Hills Resort Zone.

Information requested pursuant to cl23(1)(a) of the First Schedule

6. The following requests for information are made:
 - a. Provide expert landscape comment with respect to the appropriateness of the proposed 450m and 300m lot size strategies and provide clear reasons in the s32 Report as to why each strategy is supported in this location, and whether one strategy is preferred over the other (again with clear reasons and evaluation against s32 tests, if that is the case); and
 - b. Provide expert landscape advice specifically in relation to the effects of the private plan change in relation to the existing expected plan outcome of no buildings within the POS-P2 and POS-P3 parts of the site; and
 - c. Clarify what is proposed in regard to adhering to the Arrowtown Design Guidelines; and
 - d. Provide commentary with respect to potential cumulative effects from a landscape perspective, in light of Private Plan Change 1 – The Hills Resort Zone.

- e. Provide commentary with respect to the potential adverse visual amenity effects in relation to rural living and residential properties on McDonnell Road in the vicinity of the plan change land; and

Information requested pursuant to cl23(1)(c) of the First Schedule

7. The following requests for information are made:
- a. Advise any zoning/overlay preferences for the proposed BRA areas in this regard from an expert landscape perspective, including clear reasoning; and
 - b. Advise whether a bespoke treatment should be expanded to address fencing controls adjacent BRA (or NCZ areas) to ensure an appropriate interface with McDonnell Road. If so, please clarify the intended controls and how they would be incorporated into the proposed provisions. If not, please explain why this is considered unnecessary. Again, please consider the use of a structure plan to be incorporated into Chapter 27.

Ecology

An Ecological Assessment of Indigenous Plantings has been provided by Natural Solutions for Nature Ltd as Appendix P. Within this document there were recommended Management Measures for Stage 2, including planting, pest management and sediment control.

The Ecological Assessment of Indigenous Plantings states there may be some displacement and encroachment into the riparian zone of the POS-W1 (Waterway) area. It does not provide comment on whether the 7-metre setback from this waterway is appropriate to ensure there is no ecological degradation to it.

In the Stormwater Feasibility Report, included within the Infrastructure Feasibility Report (Appendix N) outlines that two additional dry basins will likely be required to manage the stormwater run-off from the residential development. It was commented that there is “potential to plant the bases and embankments with native wetland and riparian vegetation”. However, the appropriate plantings have not been confirmed within the Ecological Assessment, PPC Request nor the s32 Report, and that these basins will not have any adverse impacts on the waterway. Additionally, the Stormwater Feasibility Report recommends ongoing maintenance activities (See section 7.3) for these basins.

Information requested pursuant to cl23(1)(a) of the First Schedule

8. The following requests for information are made:
- a. Provide a statement from a suitably qualified and experienced ecologist which confirms whether the proposed 7-metre setback for a residential development from the waterway is appropriate to prevent any ecological degradation to it; and
 - b. Provide a statement from a suitably qualified and experienced ecologist which confirms what would be appropriate plantings for the proposed dry basins to manage stormwater run-off.

Information requested pursuant to cl23(1)(b) of the First Schedule

9. The following requests for information are made:
- a. If the 7-metre setback is confirmed to not be appropriate by a suitably qualified ecologist, then provide a suitable solution to address this matter; and
 - b. Advise if the Open Space Management Plan (OOSMP) and Private Open Space Management Plan (POSMP) will be updated to reflect the recommendations outlined within the Ecological Assessment of Indigenous Plantings provided by Natural Solutions for Nature Ltd; and
 - c. Advise if the OOSMP and POSMP will be updated to reflect the recommended Maintenance Activities for the two proposed dry basins outlined within Section 7.3 of the Stormwater Feasibility Report (included within the Infrastructure Feasibility Report, Appendix N), and if the design and plantings recommended by a suitably qualified ecologist will be included.

Landscape & Ecology – Private Open Space Management Plan (POOSMP) and Overarching Open Space Management Plan (OOSMP)

In the current provisions for the ASSZ in Chapter 12 of the ODP, the POOSMP and OOSMP is directly referenced under 12.32.3.2(i)-(iii) as a controlled activity to be included for Subdivisions to manage the appropriateness of the plantings, weed control and rabbit control for the area. The POOSMP and OOSMP are also referenced under 12.32.6.2 (i)-(iii) under the Assessment Matters.

The PPC Request does not propose that the POOSMP and OOSMP are referenced directly within the PDP, either within the SRZ Chapter or the Subdivision & Development Chapter 27. Instead, the PPC proposes that conditions (f) and (g) from existing Consent Notice 11585126.5 will need to be formally varied at the time of a future subdivision pursuant to Section 221 of the RMA.

Conditions (f) and (g) of the existing Consent Notice state:

(f) All private open space areas, building/fencing restrictions and landscaping maintenance areas labelled on the approved plans identified in Condition (1) of RM161093 (as varied by RM181358) prepared by C Hughes & Associates Limited shall be managed in perpetuity in accordance with the Private Open Space Management Plan and Overarching Open Space Management Plan required under Condition 22 of RM161093 (as varied by RM181358).

(g) With regard to Lot 103, all building and earthworks are prohibited within the area shown as POS-ES on the Structure Plan from the Arrowtown South Special Zone on the Operative District Plan.

Therefore, there is a reliance at the consenting phase rather than within the plan itself for the POOSMP and OOSMP to have legal weighting. There is no commentary within the PPC Request nor s32 as to whether this is an appropriate process to ensure ongoing compliance with these approved plans in order to maintain and enhance the ecological and landscape values of the zone.

Alternatively, as suggested earlier, provisions could be included in PDP Chapter 27 in the form of a structure plan and associated rules in Chapter 7 and/ or Chapter 27 which could address this matter.

Information requested pursuant to cl23(1)(c) of the First Schedule

10. The following requests for information are made:

- a. Provide reasoning as to why it has not been proposed that the POOSMP and OOSMP are directly referenced within the proposed provisions and why it was deemed to be more appropriate to vary the existing consent notice 11585126.5; and/or
- b. Alternatively, advise if it would be more appropriate to use a structure plan within Chapter 27 and associated rules to manage the ongoing plantings, weed control and rabbit control for the area, instead of reference to the POOSMP and OOSMP within the plan or a variation to the existing consent notice 11585126.5.

Urban Design

While the Urban Design assessment notes that the proposed 7 m waterbody setback will establish a riparian and open space corridor accommodating the existing lower trails, it does not adequately explain how the built form responds to this interface.

Information requested pursuant to cl23(1)(a) of the First Schedule

11. Please provide further detail on the interface between the proposed built form and the waterway identified as Private Open Space Waterway 1 (POS-W1) in the current ASSZ Structure Plan (Chapter 12, ODP). In particular, further clarification is sought on how Crime Prevention Through Environmental Design (CPTED) principles have been integrated and applied along the northern and southern edges of the waterway in the proposal.

Section 32 Evaluation

Section 2.2 Objectives of the Request

As currently drafted, the PPC objectives express a pre-determined position on the appropriateness of methods to address the identified resource management issues.

Section 2.3 Options

Alternative residential zoning under the PDP has not been considered as a reasonably practicable alternative option, including the PDP Medium Density Residential Zone (MDRZ). There has also not been any consideration of the option to use the SRZ with any other bespoke provisions, in addition to the Building Restriction Areas (BRA). The s32 options analysis is silent on bespoke provisions referred to in the Private Plan Change Request document accompanying the s32 Report and appendices.

Section 2.4 Examination of the Options

The PPC Request (Page 19) advises areas of the site could be BRA or Open Space Nature Conservation Zoning (NCZ). The Section 32 Report does not consider any other options for an alternative Open Space Sub Zoning or explain why NCZ would be best suited.

There is a reliance on the areas within the BRA to be used as appropriate open spaces to provide for the community, which are both desirable and accessible. There does not appear to be any appropriate mechanisms in place to ensure that public access will be guaranteed for these areas within the BRA. Additionally, these areas have a step topography, which may not be considered as easily accessible nor a desirable area.

There are references to the notified UIV LDSR density to apply (300m²) in parts of this application, and Subdivision Concept Plans are attached to the s32 Report as Appendices G and H. However, the s32 Report does not provide analysis of bespoke density provisions in the SRZ, nor are bespoke provisions included in the PPC Request document, which includes other bespoke provisions sought to be inserted in PDP Chapter 27.

The preferred option outlined in the s32 Report should be clear that it would include bringing the land into the PDP, which would result in the PDP districtwide provisions that apply to the SRZ also applying to the Site. These provisions are not currently assessed in the s32 Report.

There is not an assessment of the bespoke provisions proposed on page 22 of the PPC Request, under Chapter 27, 27.3 within the S32 evaluation.

McDonnell Road – Suburban Residential Zone

Objective 27.X.X.X Subdivision that achieves a high quality outcome in terms of indigenous planting and riparian enhancement.

Policy 27.X.X.X To require native planting strips along the McDonnell Road frontage, waterbodies and along the southern boundary of the land.

Section 4 The risk of acting or not acting

On page 9 of the S32, it states that Option 4, the rezoning of this site to SRZ, will result in the following advantage “With suitable infrastructure upgrades, future residential development of the Site can be accommodated by existing infrastructure servicing”. These infrastructure upgrades, namely the Waste Water Pump, have not yet been confirmed as being feasible by the Property and Infrastructure Team within Council. Therefore, this could be considered as a risk of acting, whilst the Section 32 report states there are no risks of acting.

Section 5 Evaluation of the provisions under the relevant District Plan Objectives

There has not been any acknowledgement of the existing ASSZ provisions that apply to the Site, and why they are no longer appropriate for the Site, aside from a very brief assessment. Additionally, there is no mention of the PDP districtwide provisions and their level of appropriateness for the site.

Section 6 Evaluation of the provisions under the relevant regional planning instruments

An evaluation against the current Operative Otago Regional Policy Statement has not been made. On March 30th 2026 the Proposed Otago Regional Policy Statement was made fully operative since all appeals have been fully resolved.

Consultation

The s32 Report does not include a consultation section. The only reference to consultation in the s32 Report is in relation to engagement with iwi being relied upon at the resource consent stage. There is also no reference to how the owners of the balance land within the site have been engaged with.

Information requested pursuant to cl23(1)(a)-(d) of the First Schedule

12. In consideration of the above information, please provide the below information in an updated s32 Report:

- a. Objectives that do not refer to specific methods; and rather that describe the resource management outcomes sought by the PPC; and
- b. Within the options analysis, please provide an assessment against alternative residential zoning under the PDP; and
- c. Evaluate why the NCZ subzone was deemed to be the most appropriate alternative to the BRA out of the four sub-zones listed in Chapter 38 of the PDP; and
- d. Please outline how the areas with the BRA can be guaranteed for public access if they are kept in private ownership and can be easily accessible and desirable for the use by the local community; and
- e. Please update the S32 report for the “Risks of Acting” to include infrastructure considerations and any other potential risks; and
- f. Please update the s32 Report to include an assessment of all bespoke provisions, including a marked-up version of all relevant PDP Chapters sought by the proposal; and
- g. Provide a more fulsome evaluation of why the current ASSZ provisions in their entirety are a less appropriate option, and whether any current ASSZ provisions should be incorporated into bespoke provisions; and
- h. Provide an evaluation against the current Operative Regional Policy Statement; and
- i. Please amend the s32 to include a summary of the consultation undertaken; and
- j. Please update the s32 to respond to any changes proposed by the requestor, in response to the RFIs set out in (1) to (7) above.

Affordable Housing

The HBA says the district has a lack of housing in the affordable price bracket (this with need a ref / citation from the 2025 HBA). Per PDP provision 1.1B (which sets out the Structure of the District Plan), ODP Policy 4.10.1 Affordable and Community Housing applies to the PPC land.

Information requested pursuant to cl23(1)(c) of the First Schedule

13. Please provide information regarding affordable housing outcomes, including regarding contributions of land or money to the Queenstown Lakes Community Housing Trust.

Yours sincerely, Nāku noa nā

A handwritten signature in black ink, appearing to be 'Charlotte Clark', written in a cursive style.

Charlotte Clark