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SUBMISSION TO PLAN CHANGE 2- ARROWSOUTH

SUBMISSION ON	**Plan Change 2- Arrowsouth**
ON BEHALF OF	**Mt Soho Trust Limited** 175 McDonnell Road, Arrowtown
DATE	**15 November 2026**
Prepared by (agent)	Jenny Carter JCarter Planning Limited
Agent contact details	021 632849 jenny@carterplanning.nz
Outcome sought	The Arrowtown South Zone, including Mount Soho Property, should be rezoned comprehensively, whether by its incorporation into Plan Change 2, or as a Council lead plan change.
Hearing	The submitter wishes to be heard at the hearing.

1. Introduction:

The submitter in-principal supports residential development on the Plan Change site, however is opposed to the extent of residential rezoning sought and the limited scope of the Plan Change. The rezoning of only a small portion of the Arrowtown South Zone represents ad hoc planning and is not in accordance with sound resource management practice. Therefore, this proposal, to incorporate only a small portion of the Arrowtown South Zone into the PDP, is opposed in part.

To address these concerns the submitter therefore seeks:

- that Plan Change 2 Arrowsouth (PC2) is extended to include the entirety of the operative Arrowtown South Special Zone, or otherwise to incorporate the adjacent land also currently zoned Arrowtown South Zone.
- Amend the location of the proposed urban growth boundary (UGB) so it is located to wrap around / incorporate the entire Arrowtown South Zone.
- Rezone the Mount Soho Trust land (Submitter land) to Suburban Residential, with a Building Restriction Area across the steep scarp slopes and the wetland areas.
- Incorporate a set of bespoke provisions for the rezoned Submitter land including a setback from McDonnell Road, height restrictions and minimum lot sizes on the more sensitive ridge area and on the McDonnell Road side.
- Rezone a portion of the Submitter land as local shopping centre zone in the area of the current historic Merryfield Venue site.

The Submitter seeks the above relief by submission on PC2 as notified, or in the alternative, that PC2 be refused and incorporated into a Council-lead spatial planning exercise for the whole of the Arrow South Special Zone.

2. Summary

The whole of the Arrowtown South Special Zone, which has not been reviewed as part of the Proposed District Plan (PDP), should be considered strategically and comprehensively.

The current Spatial Plan did not identify any growth or expansion in or around Arrowtown and while Council was progressing a review of the Spatial Plan in 2023 (SP Gen2) that work was paused awaiting the completion of the Housing and Business Capacity Assessment (HBCA). While the HBCA is now complete, the work on SP Gen2 has not recommenced.

The Council commenced a review of the Arrowtown South Zone as part of Stage 4 of the District Plan Review. However, upon the announcement of the Plan Stop legislation in August 2025, the Council's work was halted. The Council has since applied successfully for exemptions to the Plan Stop for other Special Zones but has not sought such for the Arrowtown South Zone.

As identified in the Insight Economics Report (attached as Appendix J to PC2) there is a shortfall of housing supply in Arrowtown. Arrowtown is now the most expensive suburb in the country. Recent decisions on the Council's Urban Intensification Variation (UIV) resulted in a reduced height and density uplift compared to other residential zonings and therefore reduced availability for further brownfield housing growth within Arrowtown. Even if PC2 is approved, that provides only 44 sections. Arrowtown's long term growth needs to be assessed strategically and comprehensively so that the shortfall in housing supply can be addressed.

The Council is tasked with planning for anticipated and projected growth and is directed to provide sufficient housing capacity from the likes of the National Policy Statement for Urban Development (NPS UD). It is poor planning to 'ignore' this existing operative zone adjacent to Arrowtown, rather than taking the opportunity to consider the zone as a whole on a comprehensive basis. This failure to consider this existing zone comprehensively risks poor planning outcomes and fails to meet the requirements of the NPS-UD.

3. Reasons for this submission request:

3.1 Plan changes should be comprehensive and strategic

While the submitter supports a Plan Change to incorporate the Arrowtown Special Zone into the PDP, it opposes PC2 to the extent that it fails to consider the majority of Arrowtown South Zone comprehensively and instead proposes only a small portion is incorporated into the PDP. PC2 is therefore opposed to the extent that the entire Arrowtown South Zone should be assessed comprehensively and rezoned. Undertaking small ad hoc zone changes, as is the case here, does not represent sound resource management and as such fails to provide for the strategic growth of Arrowtown.

Part two of the PDP is titled Strategy and includes Chapter 4 Urban Development. This contains the following provisions regarding urban development. The following is particularly relevant:

4.1 Urban Development

This chapter gives effect to the National Policy Statement on Urban Development (NPS-UD), which requires that local authorities provide at least sufficient development capacity to meet the current and future needs of the District's community. This chapter provides the strategic planning framework to achieve effective and efficient urban environments that can meet demand for the development of land for housing and businesses. Provision is made for a range of dwelling types and locations and business environments and for the District's urban areas to develop and change over time in response to the changing needs of the District's community.

The roading network of the District is under some pressure and more low density residential development located remote from employment and service centres has the potential to exacerbate such problems.

These provisions were introduced in response to the NPS-UD and therefore were not in place at the time the Arrowtown South Zone was first considered in 2009 (or decided in 2013). Rezoning the Arrowtown South Zone comprehensively enables the provision of sufficient development capacity. The Arrowtown South Zone is adjacent to Arrowtown and is therefore not located remotely from employment and service centres.

The consideration of the Arrowtown South Zone comprehensively would help give effect to the NPS-UD.

3.2 Urban Growth Boundary

There is no rationale for relocating the Urban Growth Boundary (UGB) to the position proposed by PC2. The location of the UGB should be based on planning and landscape assessments, not land ownership (or the location of a fenceline). The relocation of the UGB should be considered strategically and with regard to the surrounding context, including by assessment of the provisions of chapter 4 of the PDP, such as the requirement for urban growth boundaries to be used as a tool to manage the growth of urban areas within distinct and defendable urban edges (objective 4.2.1).

The location of the Arrowtown UGB has not been considered comprehensively since it was first promoted in 2009. Since then, the receiving environment and policy context has significantly changed, now justifying its reconsideration. These changes include:

- Council extending the UGB around its own Tewa site,
- The growth experienced within the District and the basin,
- The Wakatipu Basin Study and subsequent plan changes and variations,
- The District Plan review and associated rezonings, including the rezoning of the Hills, inclusion of Hogans Gully, Wakatipu Basin Rural Lifestyle Precinct, and rezoning of the Arrowtown Golf Course to Open Space,
- The adoption of the NPS-UD and subsequent changes to the PDP, which includes the Urban Intensification Variation (UIV).
- The approval and construction of the Arrowtown Lifestyle Retirement Village to the south (consented via the Special Housing Act),

- The findings of the HBCA, recently updated to adjust the projected capacity following decisions on the UIV[1],

The relevant objectives and policies of Chapter 4 that provide guidance to urban growth boundaries read:

Objective - Urban Growth Boundaries used as a tool to manage the growth of urban areas within distinct and defendable urban edges

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 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.*

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).

Extending the UGB to wrap around the Arrowtown South Zone achieves the above objective and associated policies, whereas relocating the UGB as requested by PC2 could potentially read as or result in sprawl given it is not based on a defensible edge.

[1] Please see agenda item to Council's Smath Growth Committee titled 'Addendum to the Housing and Business Capacity (HBA) 2025 Assessment, dated 3 November 2026

As outlined in the Insight Economics Report (Appendix J to PC2) there is a shortage of housing supply in Arrowtown. Extending the UGB as requested by this submission would provide sufficient and feasible development capacity within Arrowtown. This supply is needed in order to ensure that there is ongoing availability of competitive land supply for urban purposes. The Arrowtown South Zone land, by being adjacent to Arrowtown, supports a compact and efficient urban form and does not represent sporadic urban development in a rural area. The site does not contain highly productive soils and development can be accommodated in such a way that risk of natural hazards is avoided, and heritage and ecological features can be protected and enhanced.

Reviewing the location of the UGB is necessary to address the changing community needs of Arrowtown. It is a response to the evidence that there is a shortfall of capacity within Arrowtown. The considered relocation of the UGB as requested would better enable appropriate urban development, having regard to Policy 4.2.14, addressed above.

3.3 Economics Assessment

As identified in the Insight Economics Report (attached as Appendix J to PC2), Arrowtown has a shortage of housing. The Report concludes

Arrowtown faces a persistent shortfall in feasible and deliverable housing capacity, even under the modest demand projections contained in the HBCA. However, the HBCA appears to both understate demand and overstate effective supply, so the shortfalls are likely to be worse in practice.

At paragraph 2.3 the Report states:

According to the HBCA, Arrowtown is projected to experience only limited demand for 190 extra dwellings over the next 30 years. This is reflected in the Spatial Plan, where Arrowtown was not classed as a growth area, and no provision for growth-related infrastructure or higher-density development was made. This confirms that Arrowtown's role in accommodating future growth story is marginal at most. At the same time, though, the HBCA shows in an Arrowtown wide sense that there is no feasible and infrastructure-ready capacity available in the short-term to meet even the modest demand projected for Arrowtown.

The findings of the Insight Economics Report provide a basis for revisiting the Arrowtown South Zone. Consideration needs to be given to Arrowtown's future and its role to play in providing for sufficient housing capacity as part of the broader Queenstown Urban area and such consideration should be undertaken strategically and comprehensively, not through ad hoc plan changes.

3.4 Wakatipu Basin Study

The Council's Wakatipu Basin Study (Basin Study), adopted in 2018, identified an Arrowtown Precinct, and found that:

Additional urban scale development is considered appropriate in two new precincts: the Ladies Mile Gateway Precinct (LMGP) and the Arrowtown Precinct (AP). Similar options to the LMGP

apply to the AP area. The precinct will enable residential growth through provision of a range of housing opportunities in an area close to the main Arrowtown centre. New provisions need to be formulated that provide for and enable a mix of building forms and housing options. Integrated Residential Developments should be fostered by the provisions (as for LMGP). A structure planning type process is needed to develop suitable roading layouts, address landscape and amenity issues, staging and infrastructure, land ownership nuances and explore how to best stimulate development uptake.

Since the Basin Study, the QLDC has proceeded with a structure planning exercise and subsequent variation for the Ladies Mile area but is yet to proceed with one for the Arrowtown South area. Further, while the QLDC changed the zoning of the Tewa Banks site (on the southern side of Jopp Street) from Rural Zone to Lower Density Suburban Residential Zone, altered the Urban Growth Boundary to include the Tewa Banks site, then undertook the UIV, there has been no review of the location of the UGB and the zoning of the Arrowtown South Zone.

Therefore, while the Council progressed the recommendations of the Basin Study with respect to the wider Basin and Ladies Mile, the Study's findings and recommendations with respect to Arrowtown has not been reflected in any of the Council's work, with the extension of the UGB to incorporate the Tewa site, the review of the Arrowtown residential zones and the UIV all failing to consider the Arrowtown South Zone. As explained further below, the Spatial Plan, which was prepared after the Basin Study, ignored the study's recommendations and did not consider Arrowtown growth opportunities or the appropriate identification of the UGB.

This means that when considering the UIV, the community was faced with increased density and height, without being able to consider or compare this to options to extend the UGB to provide for a comprehensively planned extension to Arrowtown.

3.5 Spatial Plan

While Arrowtown was identified in the Spatial Plan it was not earmarked for any expansion or growth. As a result there was no engagement or consultation undertaken through the Spatial Plan process in terms of Arrowtown's boundaries or strategic management.

While the Council commenced the Spatial Plan Gen2 in 2023, with a call for sites and engagement commencing, that work was stalled, awaiting the HBCA. The HBCA has now been completed however there has been no further engagement and it is understood that the Gen2 Spatial Plan remains on hold.

An update was presented to the Council's Planning and Strategy Committee on 13 February 2024. This contained the following:

Spatial Plan Gen 2.0 (Future Development Strategy)

*10. Work on the Spatial Plan Gen 2.0 began in November 2022, building on the QLSP 21, the second generation Spatial Plan will meet the requirements of the National Policy Statement Urban and contain the district's Future Development Strategy (**FDS**). A key benefit of a combined FDS and Spatial Plan is that the Spatial Plan will become the*

statutory document that Resource Management Act (RMA) documents (i.e., the District Plan) must have regard to when they are being prepared or changed. The document is also strongly encouraged to inform other long-term plans and infrastructure strategies in order to promote long term strategic planning and integration of planning, infrastructure and funding decisions.

Queenstown's growth continues to exceed the Council's projections, and now that the UIV decisions are complete any brownfields capacity within Arrowtown has been reduced.

With the HBCA now complete (and updated) the Gen2 Spatial Plan should proceed. Even though the HBCA is extremely conservative with respect to capacity within Arrowtown its findings support the need for a holistic assessment of urban growth expansion for the whole of the Arrowtown South Special Zone rather than the portion identified in PC2.

3.6 Exemption to Plan Stop – why other special zones but not Arrowtown South?

In its policy update to the Planning and Strategy Committee on 2 May 2024 the Council's policy team identified that the review of the Special Zones would be undertaken in 2025. A Councillor workshop was held on 26 November 2024 and a Storymap (consultation tool) was presented which highlighted the work being undertaken across the Special Zones, including Arrowtown South Zone.

A webpage was set up to outline progress on the review of the Special Zones with Section 35 monitoring reports being added as they were completed.

The Council held workshops on 16 May and then 1 July 2025, attended by the Submitter. At these workshops the Council's policy team outlined in more detail the proposed approach for each of the Special Zones. The submitter's team then attended an internal workshop with Council staff, at which the timeframes and tasks were outlined. At that time the Council was preparing Section 32 analyses, with the aim of notifying the plan changes in mid 2026.

Upon the Government's 'Plan Stop' this work halted. While the Council applied for and obtained exemptions to for the likes of Frankton Flats and Remarkables Park Zones, it has not done so for Arrowtown South, even though this is an Operative Zone in the ownership of 8 separate landowners, that has not been reviewed or considered since 2013.

Failing to consider the Zone as a whole and instead relying on private landowners to propose private Plan Changes / submissions on plan changes is not sound resource management practice and risks ad hoc decisions and outcomes. As outlined in the Insight Economics Report, there is a shortfall of housing in Arrowtown, and a consequent need to consider the future zoning options strategically.

4. The site- location, address and legal description of the site, and the registered legal owners of the land.

The Arrowtown South Zone incorporates eight separately owned titles located outside the UGB[2]. Any zone change should incorporate all the land within the Arrowtown South Zone and determine the most appropriate zoning across the Zone, informed by the strategic provisions of the PDP and the purpose of the Act. Therefore, while this submission focuses on the submitter's site, owned by Mount Soho Trust Limited and being the largest landholding within the Arrowtown South zone, it is considered that all of the Arrowtown South land should be assessed and incorporated into the PDP and included in PC2.

The submitter's site is legally described as Section 1 SO 24781, Lot 1 Deposited Plan 25880 Part Section 104 Bulk VII Shotover SD- Sec SO 24781, held in Record of Title OT19C/187. The site is in the ownership of Roger Monk and Cook Adam Trustees Limited, under the company name Mount Soho Trust Limited. The submitter's site also includes the adjacent property at 132 Centennial Avenue (Lot 2 Deposited Plan 25880).

The site has road frontage to Centennial Avenue to the east and is bounded to the north by the Suburban Residential Zone of Arrowtown. To the south is the Arrowtown Golf Course, the Hills Golf Course and the Arrowtown Retirement Village. The site has frontage to McDonnell Road to its west and has been used for low level farming purposes and is largely in pasture. It contains two historic buildings, one being the Muter homestead, the other the woolshed which has been carefully restored and is consented to provide the Merryfield wedding venue.

The site location and its context are illustrated below:



Figure 1: Site location adjacent to Arrowtown (Source: QLDC webmaps 2022)

[2] Arrowtown South Zone also includes land within the UGB and that has been developed in accordance with the Zone provisions for that part of the structure plan.

Figure 2 below is an extract from the Proposed District Plan (PDP). As illustrated, the site and wider Arrowtown South Zone is shown as white because it has not been included in the PDP Review and retains its Operative Arrowtown South zoning.

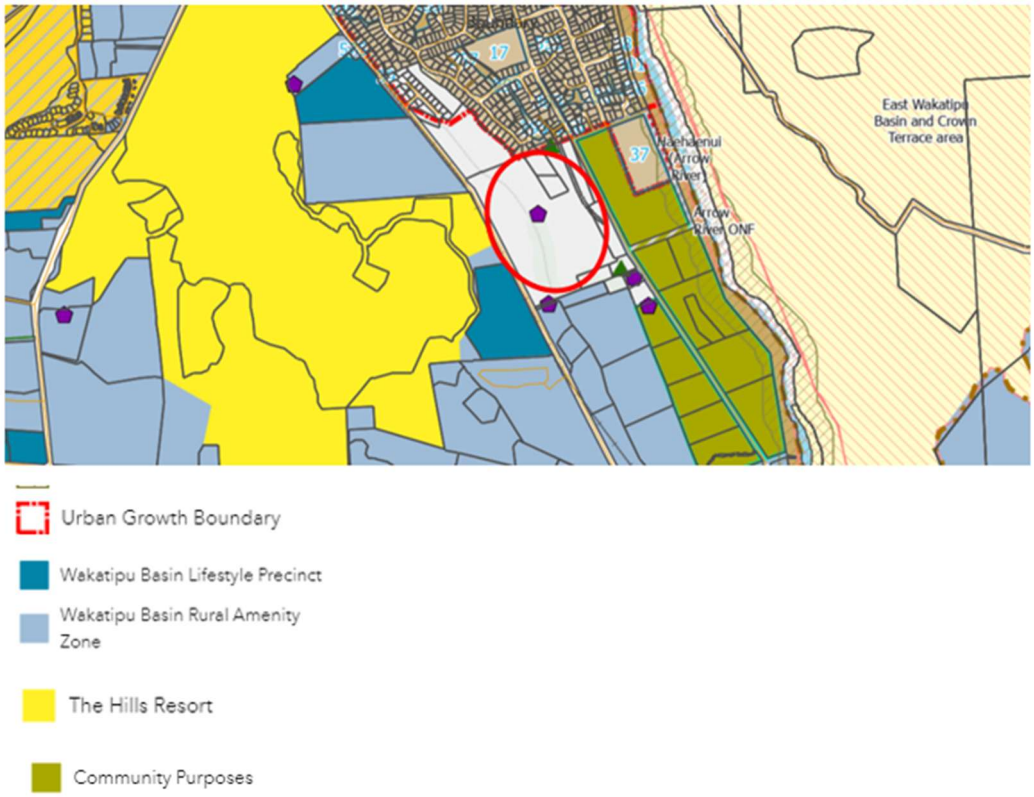


Figure 2: Site location showing zoning under the Proposed District Plan (Source: QLDC webmaps 2022)

The submitter's site is 17.9ha in area, and provides two gently sloping areas, one fronting onto Centennial Avenue, and the other onto McDonnell Road. These are separated by a relatively steep escarpment. The site reads as a contiguous landform with the PC2 site and is indistinguishable from that site other than by a cadastral boundary defined by a fenceline.

5. Zoning – the Arrowtown South Zone and preferred rezoning

Consistent with the recommendations of the Basin Study, it is submitted that the Arrowtown South Zone should be incorporated into the PDP and rezoned to recognise its ability to absorb development and provide housing supply within Arrowtown.

As illustrated above, the land is located adjacent to the urban area of Arrowtown, and while the zones surrounding it have been incorporated into the PDP through the District Plan Review, this land has not and it remains zoned Arrowtown South Special Zone under the ODP.

This zoning was established in 2013 following two separate plan changes first promoted in 2009 (Urban Growth Boundary and Arrowtown South Special Zone). This zoning enables rural lifestyle development, specifying 16 residential building platforms and imposing a structure plan. That

zoning was determined on the basis of the evidence presented at the time, and the then context of the environment. Much has changed since then, including the approval and construction of the Arrowtown Lifestyle Retirement Village, the promulgation of the PDP review and its associated studies including the Wakatipu Basin Study, the adoption of the NPS-UD and the subsequent variations to the PDP (including updated provisions in Chapter 4 as identified above), and the UIV. Even though these are changes to both the physical environment and planning and policy setting there has been no opportunity to reassess the appropriate placement of the UGB and the zoning of the land contained within the Arrowtown South Zone.

Development in accordance with the operative zoning does not represent an efficient or effective use of resources. The status quo, being the Arrowtown South Special Zone, could create 16 rural lifestyle units. In comparison, if zoned Suburban Residential, the sites could absorb approximately up to 200 residential units, while retaining the scarp face, setbacks from McDonnell Road and enhancement of the wetland areas.

Rezoning the site and incorporating it within the UGB as part of PC2 would better achieve the national and regional policy framework and the strategic directions of the PDP, as well as the purpose of the Act, by providing a well functioning urban environment that uses land in an efficient manner. This provides a better opportunity to achieve the Chapter 4 Objectives and Policies. Of particular relevance, Policy 4.2.2.19 is addressed as follows:

4.2.2.19
Ensure that development within the Arrowtown Urban Growth Boundary provides:

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. *for Feehley's Hill and land along the margins of Bush Creek and the Arrow River to be retained as reserve areas as part of Arrowtown's recreation and amenity resource;*

e. *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.*

Inclusion of the Arrowtown South Zone within the UGB achieves this policy. It enables an urban form sympathetic to the character of Arrowtown, and is able to provide a designed urban edge with landscaped gateways that promote and enhance the containment of the town within the landscape.

The landscape and ecological values of the site will be maintained and enhanced, and the improved connectivity and provision of range of housing typologies would contribute positively to the character of Arrowtown.

The submitter's preferred option is to rezone the largest portion of the Submitter site as Suburban Residential, consistent with the existing Arrowtown residential areas, and the proposed PC2 zoning. The submitter has obtained advice and reports from technical experts, and these support the use of the site for residential development to this anticipated density.

At a broad scale, it is proposed to locate development within a site that can absorb a higher density of development. At a more fine-grained level, there is an opportunity to locate development within the less sensitive areas of the Submitter site. This would be achieved through imposing building restriction areas on the scarp face and wetland areas, imposing larger lots within the more sensitive areas of the site, and a setback from McDonnell Road. The preferred option is informed and supported by the Urban Design assessment prepared by RA Skidmore, attached and marked [**A**]. Further, the submitter has obtained ecological advice from Restore and Wildlands, landscape advice from Vivian Espie and Geotechnical advice from Geosolve.

The Urban Design advice confirms that the site can absorb residential development and that the proposed zoning can achieve a well functioning urban environment. The Arrowtown Design Guidelines would apply to future subdivision and development. The Wildlands and Restore reports (attached and marked [**B**] and [**C**] respectively) address the ecological values of the site, delineating the extent of the natural inland wetlands, the man made wetland area and providing recommendations for investment into ecological enhancement. The Geosolve Report (attached and marked [**D**]) confirms that there are no natural hazard risks.

As outlined in the landscape memo attached and marked [**F**] Mr Espie considers that subject to lower density along the ridgeline and on the northern part of the McDonnell Road side of the site, and a landscape setback from McDonnell Road, the proposal to enable residential development on the site can be supported from a landscape perspective.

Mr Espie references the findings of the Wakatipu Basin Study and agrees with those findings that the site can absorb urban development. Mr Espie considers that the PC2 suggested location of the UGB is not a defensible landscape based urban edge.

It is acknowledged that the rezoning would necessitate upgrades to reticulated services. There are efficiencies in locating development at the edge of the Arrowtown Settlement, and between the settlement and the retirement village.

The submitter has engaged with iwi and received the attached letter (attached and marked [**E**]). Further, the submitter has engaged with the Queenstown Lakes Housing Trust (QLHT) and has agreed to provide 5% of residential sections to the Trust. This represents a commitment to providing affordable housing.

Overall, as outlined above, the preferred option is to rezone the Submitter land Suburban Residential with provision for a small commercial space, and use of building restriction areas to avoid development on the more sensitive areas of the site. This is a more efficient use of land and supports the establishment of a well functioning urban environment, achieving the NPS-UD and the relevant objective and policies of Chapter 4 of the PDP. While the remaining portions of Arrowtown South Special Zone are not included in the above rezoning plan, the submitter supports their inclusion in an extended UGB and an appropriate rezoning outcome.

6. Relief Sought

1. That the Arrowtown Special Zone is incorporated into the PDP, including by:
   - The UGB, if retained, is located around the outer edge of the Arrowtown Special Zone
   - The entire Arrowtown Special Zone is rezoned comprehensively. The predominant zone would be Suburban Residential, using a Structure Plan and / or bespoke PDP provisions to:
     - place building restriction areas on the scarp face and wetland areas,
     - require a landscaped setback from McDonnell Road,
     - limit road accesses off McDonnell Road,
     - require larger lots along the ridgeline and the land adjacent to McDonnell Road,
     - require linkage through the site (between the McDonnell side and Centennial Ave).
     - provide for a commercial precinct around the existing Merryfield wedding venue.
     - require that all future development adheres to the Arrowtown Design Guidelines

2. In the alternative to the above, that PC 2 is either withdrawn or placed on hold until such time that the Council obtains an exemption to the Plan Stop and progresses a plan change to incorporate the Arrowtown Special Zone into the PDP, as it was previously undertaking as Stage 4 of the District Plan Review. The preferred zoning option is to rezone the Arrowtown South Zone Suburban Residential, locate the UGB around the edge of the Zone, and utilise bespoke provisions via a structure plan to achieve key protections such as setbacks and building restriction areas.

3. Alternatively, that the submitter's land is included in PC2, upzoned consistently with the PC2 site, being Suburban Residential Zoning with building restriction areas and inclusion of bespoke provisions.

4. Any alternative, consequential or other amendments to Plan Change 2 to give effect to the intent and objectives of this submission, including but not limited to consideration of other rezoning options for the Arrowtown South Zone that better provide for the future strategic growth of Arrowtown.

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