

APPLICATION FOR REFERRAL TO AN EXPERT CONSENTING PANEL

1. A description of the proposed project and the activities it involves.

The scope of the project is to subdivide land (17.9ha) to create approximately 104 residential lots for future housing development. This includes the associated infrastructure for the subdivision and development of the sections, including roading, walkways, connections to three waters services and reserves.

The development will consist of:

- a) Approximately 104 residential sections; and
- b) Public open space and walkway/cycle connections; and
- c) Infrastructure associated with the subdivision and development roads, parking, and infrastructure for three waters services; and
- d) Improvements to open space areas including rehabilitation and planting.

Description of activities involved in project:

- a) Subdividing land;
- b) Clearing exotic vegetation;
- c) Carrying out earthworks (including disturbing potentially contaminated soils);
- d) Constructing roads, parking, and public transport related structures;
- e) Constructing infrastructure connections to three waters services;
- f) Discharging stormwater run off onto land;
- g) Developing land for public open space including landscaping and planting and construction of public accessways;
- h) Planting of wetland areas and an escarpment face;
- i) Carrying out any other activities that are-
 - Associated with the activities described in paragraphs (a) to (j); and
 - Within the scope of the projects as described in clause (3) of this schedule

This is a proposal for a subdivision and land use consent to develop Brackens Ridge (BR), a site located adjacent to the southern edge of the Arrowtown township. The site is currently zoned 'Arrowtown South', a special zone managed by a structure plan that enables 17 rural lifestyle lots on the site, with a minimum lot size of 1500m² and an average of at least 4000m².

This is a proposal to undertake a subdivision that would enable approximately 104 residential lots, with a range of lot sizes. The applicant will undertake all of the subdivision works including connection to services, roading, access connections, street tree planting and landscaping of the open space areas. It is proposed that the terrace face and wetland open space areas will be vested as reserve, with other areas of open space retained in private ownership.

The land use component of this consent application will provide overarching approval for the construction of one primary and one secondary unit within each of the 104 lots. This is therefore

a proposal to undertake a subdivision that then enables the development of up to 208 residential units.

The layout of the subdivision has been designed to respect the site's natural features, with setbacks from the wetlands, retention of open space areas and limiting development within the more sensitive areas of the site. The subdivision is designed to achieve excellent connectivity, and the varying lot sizes will enable the construction of a range of housing typologies. Each lot will be subject to design controls including setbacks, materials, and height, and certain lots will be required to be developed 'comprehensively' to achieve higher density duplexes and townhouses. The proposal will connect into reticulated services and the public transport network. It is supported by urban design, landscape, traffic, ecological and economic reports.

2. The approximate location of the project (which may be on a map), the address and legal description of the site, and the registered legal owners of the land.

The 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 the applicant, being Roger Monk and Cook Adam Trustees Limited, under the company name Mount Soho Trust Limited.

The site has road frontage to Centennial Avenue to the east and is bounded to the north by the Lower Density Residential Zone of Arrowtown. To the south is the Arrowtown Golf Course, the Hills Golf Course and the Arrowtown Retirement Village. It has frontage to McDonnell Road to its west and contains wetland areas, some of which are natural, and some constructed. The site has been used for farming purposes and is largely in pasture.

The site location and its context is illustrated below:



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

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

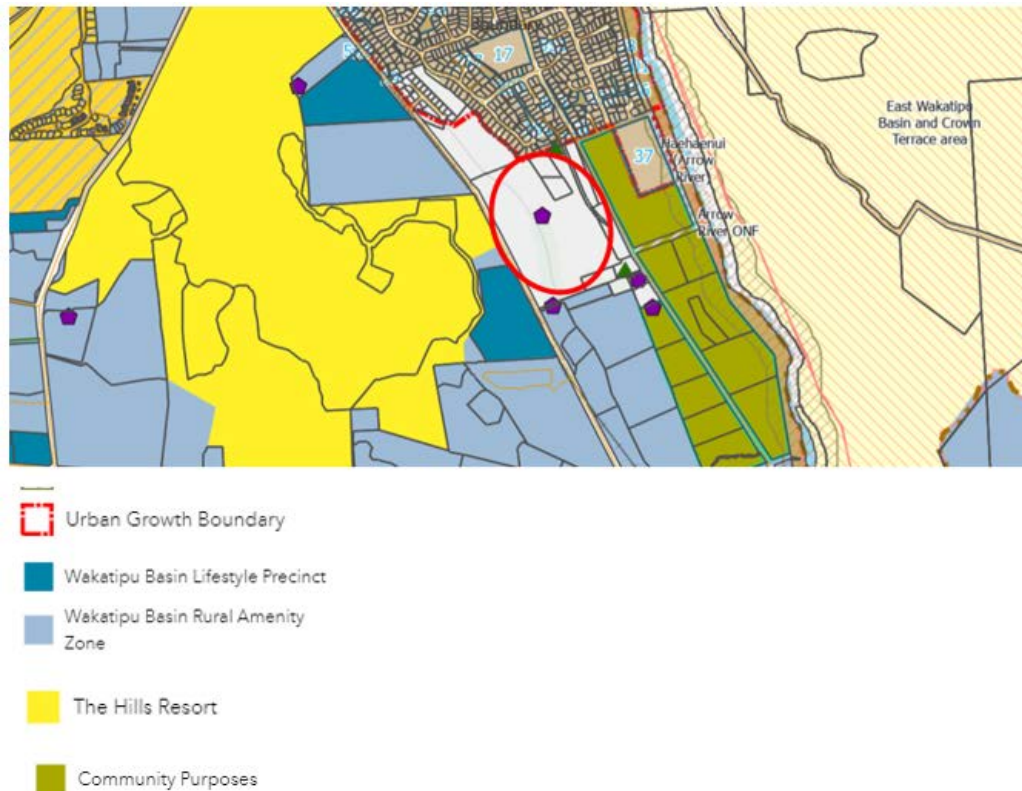


Figure 2: Site location showing zoning under the Proposed District Plan (Source: QLDC webmaps 2022)

The 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.

2.1 Background/context

The site is zoned “Arrowtown South Special Zone”. This Special Zone was established by way of a private plan change (PC39) request that was lodged with Queenstown Lakes District Council (QLDC) in 2009. PC39 was notified for submission on 9 December 2009. Its purpose read:

To rezone approximately 30 hectares of Rural General zoned land, located to the south of Arrowtown, to a new residential Arrowtown South Special zone. The development will be located between Centennial Avenue and McDonnell Road, will adjoin the Arrowtown Low Density Residential Zone along its northern boundary and the Arrowtown Golf Course to its south. The proposed changes to the Operative Queenstown Lakes District Plan will include new provisions within Section 12 that will provide for a special residential zone and provisions for a small commercial village precinct.

The rules were based on a structure plan that provides residential development, with setbacks from the water course, retention of the escarpment face as open space, and road and walkway connections.

PC39 was processed alongside two separate but related plan changes, being Plan Change 29 (PC29) and Plan Change 30 (PC30). These related to Urban Growth Boundaries (UGB) that would apply across the District.

The Commissioner decision was to reject PC 39, and in terms of PC 29, the decision was that the UGB would remain unchanged; i.e. that it would wrap around the existing residential area of Arrowtown. The key issues were whether Arrowtown should grow, and the effect of that growth on the town's character.

Both decisions on PC 29 and PC 39 were appealed to the Environment Court. The Court's decision on PC 29 was issued on 4 February 2013, and then the decision on the private plan change rezoning (PC39) was issued the following year.

The Environment Court determined that the UGB should extend slightly along McDonnell Road, and that the remainder of Arrowtown South Zone should provide a rural lifestyle density.

Development of the site was to be undertaken in accordance with a Structure Plan and rules restrict development to certain areas within the structure plan, and to a low density. The structure plan as approved by the Environment Court is provided below with the site shown in red outline:

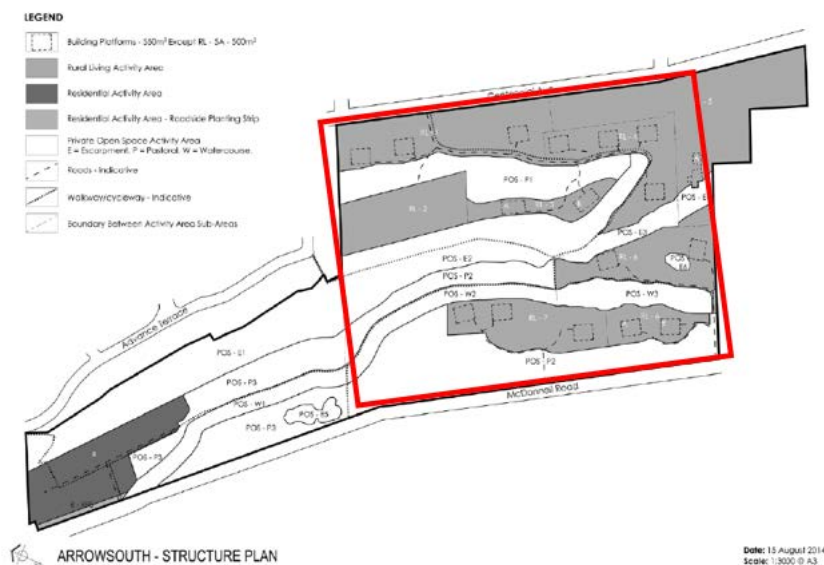


Figure 3: Structure Plan that applies to the subject site (outlined in red)

The set of plans at Annex [A] include this Structure Plan as an overlay onto the proposed master plan. Figure 4 below is an extract from that plan:

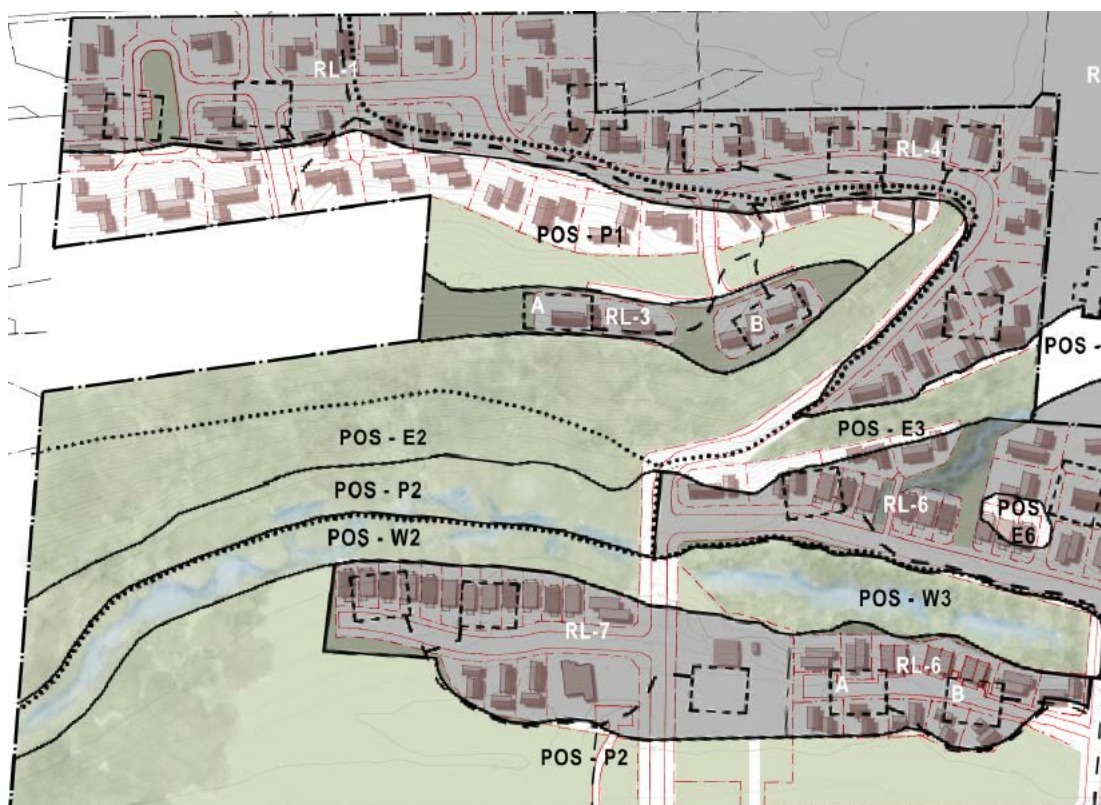


Figure 4: Extract from master plan showing structure plan overlay. (full plan provided at Annex [A])

2.2 Changes to the context- what has changed since the Environment Court decision?

Since the Environment Court decisions were issued in 2013 and 2014 there has been significant change to both Arrowtown and the wider Queenstown District.

Zoning –

- The District Plan review commenced in 2015 and has been progressing in a staged manner. Stage 1 includes updated Strategic Directions, Urban Development and Landscape objectives and policies.
- Stage 1 of the District Plan Review introduced Chapter 21 which provided for the rural areas of the District. The part relating to the Wakatipu Basin was then withdrawn and the Council commissioned The Wakatipu Basin Land Use Study (WBLUS). This study informed the rezoning of the Wakatipu Basin, identifying Landscape Character Units. As discussed in the Landscape Report (attached at Annex [C]) the WBLUS identified two areas within the Basin that could absorb urban development. One of those two areas includes this site. This is discussed at paragraph 1.35 of the WBLUS as follows:

1.35 Two areas (Ladies Mile and Arrowtown Precincts) are identified as potentially suited to low or medium density development (at 1: 450m² and 1: 250m² respectively, and assuming an ‘urban parkland’ development patterning rather than a traditional urban development pattern), while the WBRAZ and WLPZ will have comparatively limited capacity to accommodate additional dwellings given their comparatively large minimum lot sizes (80ha and 4,000m² respectively).

- Stage 2 of the PDP Review changed some of the zoning within Arrowtown from Lower Density Suburban (LDR) to Medium Density Residential (MDRZ) and the UGB was extended to include the land to the south of Jopp Street, rezoning that land from Rural to LDR. As discussed in the Economic Report (Annex [E]) these changes increased Arrowtown's capacity but no assessment was provided as to whether the UGB should be extended around the Arrowtown South Special Zone. Assessment was limited to the extension of the UGB around the Queenstown Housing Trust site.
- The golf course is zoned 'Community Purposes' (rather than 'Rural General'). This reduces the potential for future development across the Golf Course.
- The Hills Golf Course was zoned Rural but has, via mediation, been zoned 'Resort'. This is a Special Zone specific to the Hills site.

Resource consent approvals –

One of the key changes since 2014 has been the approval of the Arrowtown Retirement Village as a Special Housing Area via the Housing Accords and Special Housing Act (HASHA). The retirement village is located to the south and west of the site and provides for a range of villas, facilities and in the future will provide apartments. It provides an urban environment physically separated from Arrowtown. It is understood that while there has been a request to change its zoning, the site remains zoned Rural Amenity Zone.

Also of relevance the following resource consents have gained approval or are currently in train.

Location	Consent application	Zoning	Progress
160 Centennial Avenue	Two lot subdivision that breaches density and identification of second building platform Non Complying (RM191161)	Arrowtown South Special Zone (Rural Living Activity Area 5)	Notified (volunteered) Approved 4.8.2020
152 Centennial Avenue	Two lot subdivision that breaches density, identification of building platform (non complying RM220171)	Arrowtown South Special Zone (Rural Living Activity Area 5)	Notified (volunteered) – submissions closed 23 June 2022 One submission received from Fire and Emergency
106 Centennial Avenue	Land use consent to convert part of an existing building into a residential flat, and	Arrowtown South Special Zone	Approved November 2016

	to allow for its independent use Discretionary (RM160974)		
104 Centennial Avenue	Land use consent to construct a residential flat, and undertake visitor accommodation (RM190937) Non Complying (RM190937)	Arrowtown South Special Zone (rural living 2)	Approved February 2020
175 McDonnell Road	Land use consent to convert the historic woolshed into a wedding venue Non Complying (RM220620)	Arrowtown South Special Zone (rural living 7 and Private Open Space-Pastoral 2)	Approved 24 February 2021
Centennial Avenue (Tewa residential)	Subdivision to create 68 residential lots (RM210219)	LDR	Approved 5 April 2022
McDonnell Road	Land use consent to construct a retirement village	Rural	Approved via HASHA Act

The location of the above resource consents is illustrated in Figure 5 below:

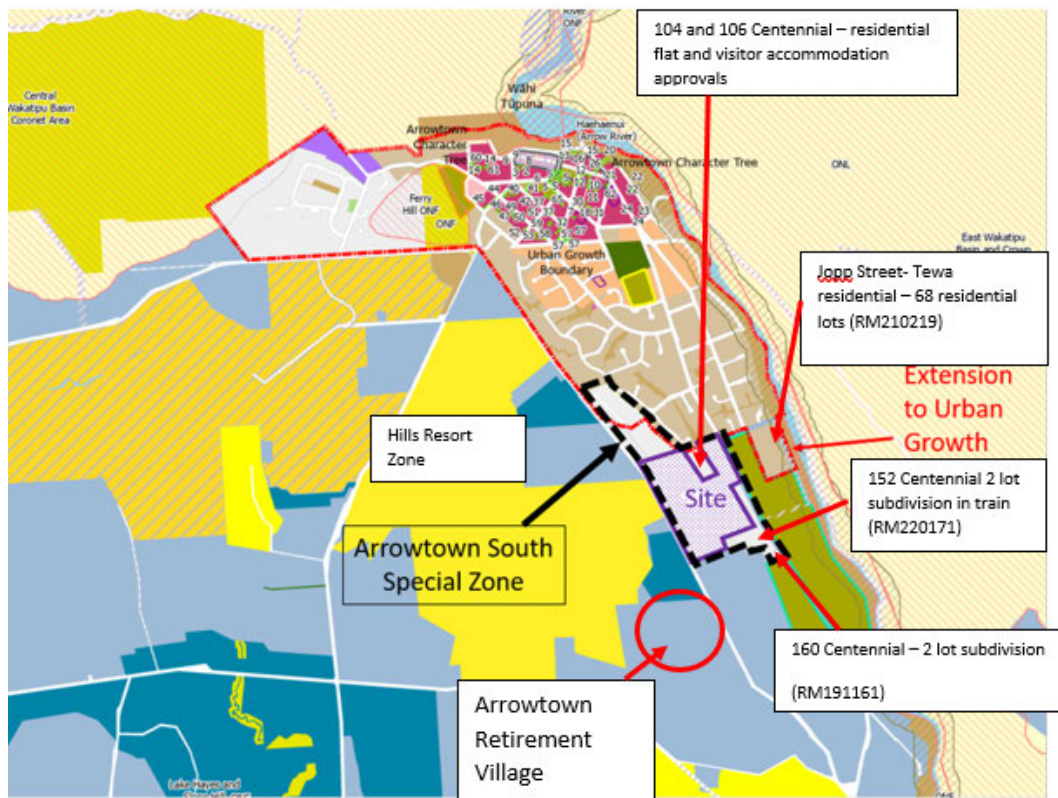


Figure 5: Location of resource consents and zoning

The site contains two heritage buildings; an historic woolshed and the Muter homestead. Neither of these buildings are part of, or affected by, this application.

Resource consent RM200620 has been obtained to restore the woolshed and operate a wedding venue. The resource consent approval RM200620 is attached. This application does not affect the implementation of that resource consent, and the proposed master plan does not locate any dwellings or subdivision within that wedding venue site.

Growth – as discussed in the Economic Report (Annex [E]) the residential demand in Arrowtown has and continues to far exceed QLDC’s projections. Page 19 of the Economic Report states:

demand for Arrowtown can be expected to remain high, which will mean that the remaining capacity is likely to be exhausted more quickly than anticipated and that further supply will be required. To address this, and as further set out below, additional land for housing must be made available as a matter of urgency.

(...)

We consider that there is already an undersupply of housing in Arrowtown, given increasing house prices and decreasing school roll. If this undersupply persists, the price of land (which has already escalated significantly in recent years) could increase further, which will continue to negatively impact the affordability of housing

Since the 2014 Environment Court decision, demand has remained high for residential dwellings in Arrowtown. This is having an adverse effect on the community, with housing becoming unaffordable. As stated at pages 17 and 18 of the Economic Report:

Most of the escalation in price has occurred in the last 12 months, with the District's average house price increasing by 23% and Arrowtown's increasing by 49%. Prices in both the wider District and Arrowtown have become increasingly unaffordable, with some very high sales prices being achieved. For example, in November a small old cottage in Arrowtown on 286m² of land, with one-bedroom and one bathroom, sold for \$1.85 million (53 Buckingham Street).¹

While there has been an escalation of house prices across New Zealand in the last year (27%), parts of Queenstown District have grown much faster than the national average. Most relevant to BR is that average prices in Arrowtown grew by almost twice as much as the national average.

2.3 Summary – the context

In summary, Private Plan Change 39 was notified in 2009 and sought that the site would be within the UGB and would provide residential development in accordance with a structure plan. The Environment Court issued its decision on the UGB in 2013, and then its decision on PC39 in 2014. The Environment Court's 2013 decision was to largely retain the UGB to wrap around the existing urban area of Arrowtown, and the 2014 decision amended the Special Zone provisions so that the site would contain 17 rural lifestyle sites.

The District Plan review commenced in 2015 in stages. The Arrowtown South Zone has been excluded from stages 1-4 of the review and while there have been discussions that it will be included in stage 5 or 6, the timing of those stages is not known.

Zoning in the areas surrounding the site has changed via the District Plan Review, with an area within Arrowtown changing from Low Density to Medium Density, and the UGB extended to accommodate the Tewa site which is located to the south east of the Arrowtown Residential Zone. The adjacent Arrowtown Golf Course has been rezoned 'Community Purpose' and the Hills Golf Course is now a Special Zone. The zoning of the rural areas has been informed by the Wakatipu Basin Land Use Study (WBLUS) which, as discussed in the Landscape Report (Annex [C]), identified that the site and its surrounds is within Landscape Unit 24, which can absorb urban development. The WBLUS informed Stage 2 of the PDP Review, and the Landscape Character Units are now contained in Chapter 24 of the PDP.

A number of resource consents have been approved in the vicinity. Of most significance is the Arrowtown Retirement Village to the south, which was approved via the HASHA legislation. Sites that are within the Arrowtown South Zone have obtained consent for increased density, with a recent two lot subdivision being approved following notification.

In terms of the wider planning framework, the National Policy Statement for Urban Development (NPS-UD) came into force in August 2020. The QLDC prepared its Spatial Plan in 2020 and it was adopted in July 2021. As discussed in the Economic Report (Annex [E]), while the Spatial Plan states that Arrowtown is forecast to grow by approximately 100 dwellings over the coming 30 years, there are no future urban areas noted for Arrowtown. The Spatial Plan notes that 'Arrowtown will grow within the current urban areas'. As identified in the Economic Report, there is a shortage of supply within Arrowtown. The report finds that

We consider that the growth in residential demand is likely to continue to (greatly) exceed the level shown in the QLDC projections and QLDC Spatial Plan Target. This demand outcome is

¹ NZ Herald (2021) Tiny Arrowtown cottage goes for \$1.85 million – 26th Nov.

mainly driven by the continued attractiveness of Arrowtown as a place to live, which is unlikely to change much in the future.

In conclusion, a lot has changed since 2014 when the Environment Court issued its decisions on plan changes 29 and 39. Unfortunately there has been no opportunity to revisit those decisions, and while the Council's WBLUS identifies this area as capable of absorbing development, and demand continues to exceed supply, the Council is not amenable to reassessing the zoning at any time in the near future.

3. The anticipated start and finish dates for construction (where relevant).

Once resource consent is obtained works would commence as quickly as possible, potentially before the end of 2022. The construction of the infrastructure connections, roading, services would take approximately 6 months from commencement.

4. Whether the project will proceed in stages, and if so, an outline of the staging.

The subdivision would be progressed as one stage.

5. The anticipated and known adverse effects on the environment, including temporary and permanent/ongoing effects.

Please see attached reports that address urban design, landscape, traffic, economics, ecology and infrastructure. These are summarised as follows in terms of anticipated and known effects on the environment:

Urban Design (Annex [B]) - the proposal represents an efficient use of a limited land resource and will contribute positively to the creation of a well-functioning urban environment. The importance of maintaining Arrowtown's character is addressed at paragraphs 4.18-4.25 of the Urban Design Report. It is concluded that the development concept will create an urban parkland environment, and will make a positive contribution to the character of Arrowtown. It will achieve a well functioning urban environment.

Landscape effects (Annex [C]) - The site of the proposed activities is not within an ONL, and is on the floor of the Wakatipu Basin. It is immediately adjacent to the existing suburbs of Arrowtown and is zoned for rural living land use, subject to a structure plan.

The site is within an area classified by the Council's Land Use Study (WBLUS) as LCU24. The WBLUPS recommended that the landscape unit within which the site sits (South Arrowtown LCU24) be zoned to accommodate urban development subject to a structure planning approach. Appropriately designed urban development can be accommodated in this area without compromising the landscape character or values of the Wakatipu Basin.

In relation to views and visual amenity of observers in the area immediately surrounding the site, some change will be evident if the proposal proceeds. Essentially, areas of rural living development will be replaced by areas of suburban density. The fact that the site is surrounded by golf course land use means that the potential for visual amenity to be adversely affected is reduced.

Further, it is proposed that 62% of the site's total area will be retained as open space and will be planted in indigenous vegetation. Effectively development will be located where it can be absorbed.

Any adverse landscape and visual amenity effects will not be of a significant degree and there is good potential for mitigation via detailed aspects of a resource consent application.

Traffic (Annex [D]) – While the increase in residential development will result in increased traffic volumes, these remain well within the capacity of the roads and nearby intersections. All of Arrowtown is within 2 km of the site and since the site has direct links to the wider pedestrian and cycle network, this means that these travel modes are a practical option for local travel. Access to the wider network will be possible via the new intersections on McDonnell Road and Centennial Avenue.

The road layout within the eastern portion of the site can be designed to accommodate an extension to the bus route and would be consistent with Council strategy to promote greater use of public transport.

The proximity of the site adjacent to an existing township that contains a wide range of community facilities, amenities and employment opportunities will also reduce the need to travel beyond Arrowtown and makes travel by modes other than private vehicle a practical option. While it will contribute to growth of vehicle movements on the Shotover Bridge, it is a very small component of that growth, especially when compared to the ongoing growth of Gibbston, Wanaka, Cromwell and Ladies Mile. The amount of growth that could be directly attributed to the development will be influenced by the level of access to public transport and any other travel demand measures implemented by Council, Waka Kotahi and Otago Regional Council. The site is well located and the proposal designed to achieve as much modal shift as possible.

The proposal can be supported from a transport perspective because the site is well connected to the existing transport networks, is adjacent to existing residential development and in close proximity to Arrowtown town centre and improved access to public transport and walking and cycling connections can be provided.

Economics (Annex [E]) - Demand for land and living opportunities in Arrowtown can be expected to remain high, which will mean that the remaining housing capacity is likely to be exhausted more quickly than anticipated, and further supply will be required. To address this, additional land for housing must be made available as a matter of urgency.

The Economic Report finds that there is already an undersupply of housing in Arrowtown, given increasing house prices and a decreasing school roll. If this undersupply persists, the price of land (which has already escalated significantly in recent years) could increase further, which will continue to negatively impact the affordability of housing. In that context, the proposal will alleviate some of the potential shortage that is expected in the coming few years.

The proposal will have a positive impact on housing supply in the District and Arrowtown, while being appropriately sized in the context of likely growth. The development is expected to generate approximately s 9(2)(b)(ii) in the coming decade. A benefit of the site's location is that expenditure to connect to infrastructure is lower than other sites where there is greater physical separation between services and the development site, and where greater infrastructure connections and upgrades are necessary.

The proposal achieves economic benefits, being increased employment and the provision of housing supply.

Infrastructure (Annex [H]) -The development can connect to reticulated water supply and wastewater with minimal upgrades. Stormwater can be effectively managed on site, and the site can connect to the power and telecommunications network. Given its location and the minimal upgrades to infrastructure it represents an efficient development.

Ecology (Annex [F]) The Natural Wetland Assessment (Annex [F]) identifies the areas within the site that are deemed to be 'natural wetland'. These natural wetland areas will be maintained and enhanced and development will be set back at least 10m from their edges. The accessways connecting the lower site off McDonnell Road to the upper site utilise existing culverted crossing points that are located adjacent to what is a constructed wetland. Therefore they do not affect the extent or functioning of the natural wetland areas.

More than 60% of the site will be maintained as open space, and the escarpment and wetland area will be improved, with the removal of exotic weeds and the planting of indigenous vegetation. By avoiding the natural wetland areas, improving the escarpment, and locating development where it can be absorbed (with respect to ecological values), the proposal will improve biodiversity values.

The resource consent application will include an application to prepare and implement an Open Space Management Plan. This will ensure maintenance and enhancement of the green areas within the site.

While the development will necessitate earthworks to construct roads and these roads will result in stormwater runoff, the overall effects will, on balance, be positive. This is because the construction works can be undertaken in such a way that effects are appropriately avoided and mitigated, and there is ample open space within the site to effectively manage stormwater. On balance, with 62% of the site being retained as open space, and improved in accordance with Management Plan, it is considered that ecological effects will be effectively managed and there will be environmental benefits.

Cultural- During the preparation of the plan change the attached letter was received from KTKO (Annex [G]). The issues/matters outlined can be addressed through the resource consent application process. This includes connection to reticulated services, implementation of an Environmental Management Plan during construction, and imposing an accidental discovery protocol.

The Natural Wetlands assessment and proposed master plan have been sent to Aukaha for review and comment, and further consultation will be undertaken as the project proceeds.

6. A general assessment of the project in relation to national policy statements and national environmental standards.

6.1 National Policy Statement for Freshwater Management 2020

The National Policy Statement for Freshwater Management 2020 (NPS-FW) came into effect on 3 September 2020. Its objective is provided at page 9 and reads:

(1) The objective of this National Policy Statement is to ensure that natural and physical resources are managed in a way that prioritises:

(a) first, the health and well-being of water bodies and freshwater ecosystems

(b) second, the health needs of people (such as drinking water)

(c) third, the ability of people and communities to provide for their social, economic, and cultural well-being, now and in the future

The Natural Wetlands Assessment (Annex [F]) has assessed the values associated with the water course that extends through the site, and finds that while the northern part of the wetland area is 'natural', the area of the water course to the south is a constructed wetland. There is also a small area of natural wetland to the south and east of the constructed wetland.

This report has been used to inform the master plan to ensure that development does not extend into the wetland areas. A planting plan will be established and this will provide an opportunity to improve the biodiversity values associated with both the wetland areas and the wider site. Stormwater will be discharged on site, and this will be designed to ensure that the health and wellbeing of the water course is maintained and enhanced. This can be achieved because of the size of the site, and the scale of the areas to be retained in open space.

Because the site is adjacent to Arrowtown, it is able to connect to reticulated water and wastewater, and will provide for the community's social, economic and cultural wellbeing. This is achieved by providing housing supply adjacent to the existing settlement, in a way that maintains and enhances natural and physical resources.

6.2 National Environmental Standard – Freshwater (NES-FW)

The NES-FW regulates activities that pose risks to the health of freshwater and freshwater ecosystems. The Natural Wetlands Assessment (Annex [F]) has identified the location of the natural wetlands on site, and this has informed the master plan, ensuring that development including road connections is not located within the natural wetland areas.

The road connections from McDonnell Road through to the upper portion of the site are located across existing 'causeway linkages' which are culverted. These may need upgrading to increase the width of the crossing, however they are located outside the natural wetland areas and will be located more than 10m from the edge of the natural wetland.

The NES-FW has been incorporated in the design of the Master Plan, to ensure that the natural wetlands within the site will be maintained and enhanced.

6.3 National Policy Statement Urban Development

The proposal meets the objectives and policies of the NPS-UD. A detailed assessment against the provisions of the NPS is provided at Annex [H]. Key is the ability to provide housing supply where it contributes to a well functioning urban form. The proposal achieves the objectives and policies of the NPS-UD.

6.4 National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health (NPS-C)

A Detailed Site Investigation has been prepared for the upgrade of the historic wooldshed, and this would be used as a basis for further site investigations. Such investigations will be undertaken as part of the resource consent application process.

It is noted that the site has historically been used as a pastoral farm, with the likely contributors to contaminated soils being in proximity to the historic woolshed and associated implement sheds. Those buildings are located within the 'wedding venue' site and therefore will not be affected by this proposal.

Meeting the criteria

7. An explanation of how the project meets the criteria in section 18 of the Act. The Minister cannot refer a project if it includes activities that are disqualified in section 18 – see Criteria for projects that may be approved (section 18).

The project must not include any of the following activities:

- (a) *an activity that is categorised as a prohibited activity in the RMA, regulations (including national environmental standards), or a plan or proposed plan*

The proposal is NOT prohibited.

- (b) *an activity that— would occur on land returned under a Treaty settlement; and has not been agreed to in writing by the relevant landowner*

The site is in the ownership of the applicant.

- (c) *an activity that— would occur in a customary marine title area under the Marine and Coastal Area (Takutai Moana) Act 2011; and has not been agreed to in writing by the holder of the relevant customary) marine title order issued under that Act*

The site is not in a customary marine area.

- (d) *an activity that— would occur in a protected customary rights area under the Marine and Coastal Area (Takutai Moana) Act 2011 and have a more than minor adverse effect on the exercise of the protected customary right; and has not been agreed to in writing by the holder of a protected customary rights recognition order issued under that Act.*

The site is not in a protected customary rights area.

The proposal is not disqualified by Section 18.

Persons affected

- 8. A list of the people you consider are likely to be affected by the project, including relevant local authorities, relevant iwi authorities, and relevant Treaty settlement entities.**

Te Ao Marama

Aukaha

Adjacent landowners

Queenstown Lakes District Council

Otago Regional Council

- 9. A summary of any consultation you have undertaken with those affected and the results of that consultation.**

A pre-application meeting will be held with planning staff at Queenstown Lakes District Council so that upon receipt of the application from the Ministry for review they have a good understanding of the proposal. Ongoing communication has been held with the Manager: Policy at QLDC.

Correspondence has been undertaken with Aukaha in order to understand past consultation undertaken with respect to the site. The Master Plan, Natural Wetlands Report and application documents have been sent via email. It is intended that once complete this application will be sent to both Aukaha and Te Ao Marama for discussion and feedback.

- 10. A list of any Treaty settlements that apply to the project location, and a summary of the principles and provisions.**

Not relevant

Completing the project

- 11. A description of your legal interest in the land where the project will occur and whether all the land required for the project is under your control. Include a statement of how your interest in the land affects your ability to do the work.**

The site is in the ownership of the applicant.

- 13. An outline of the resource consents and any designations, or changes to designations, you consider are needed to authorise the project. This includes those that someone else may need and should include both district council and regional council consents, and the activity status of the consents. Below is an example of the level of detail:**

The site is within the Arrowtown South Zone of the Queenstown Lakes Operative District Plan (ODP). The following table identifies the resource consents required under the ODP and the

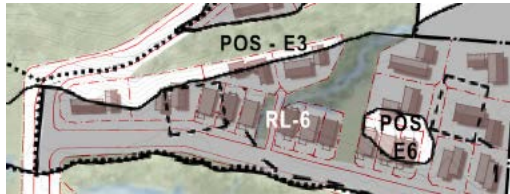
activity status. A rules table is provided at Annex [J] which assesses the proposal against all of the relevant rules of the ODP. The following is then extracted from that comprehensive rules table, to identify the rules that are breached.

It is noted that the Arrowtown South Zone is within Volume B of the District Plan; given that it is land that has not been reviewed. Section 1.1 of the District Plan states:

Volume B of the District Plan consists of the zone chapters, or specific areas not yet reviewed or notified as the Proposed District Plan, and all relevant parts of the 2007 District Plan district wide chapters that need to remain to regulate district wide issues as they relate specifically to those Volume B provisions.

Therefore, in terms of determining the applicable rules, it is those contained in the ODP and there are no applicable rules contained in the PDP. The rules that are triggered are as follows:

Rule	Triggered	Discussion
12.32.3.2 Controlled Activities		
i. Subdivision including Over-arching Open Space Management Plan Prior to any development a subdivision which includes an Overarching Open Space Management Plan in respect of:	Yes	Prior to the development an open space management plan will be prepared, addressing the matters over which control is reserved.
ii. Subdivision Including Private Open Space Management Plans Subdivision including Private Open Space Management Plans for a combination of, or an entire Private Open Space Activity Area POS-E1, POS-E2, POS-E3, POS-E4, POS-E5, POS-E6, POS-W1, POS-W2 and POS-W3	Yes	Prior to the development a private space management plan will be prepared, addressing the matters over which control is reserved.
v. Residential flat – Rural Living Areas	Yes	It is proposed that each of the sites will be able to accommodate both a residential dwelling and a residential flat.
12.32.3.3 Restricted Discretionary Activities		
ii. Buildings in Rural Living Activity Area RL-3 The erection or alteration of the external appearance of any building in Activity Area RL-3 with respect to: a. External appearance of buildings b. Provision and location of car parking c. Landscaping and tree planting d. Earthworks e. Access	Yes	Four dwellings would be located within RL-3
12.32.3.5 Non Complying Activities		

<p>i. Buildings – Open Space Activity Area – Escarpment (POS-E1, POS-E2, POS-E3, POS-E4, POS-E5, E6) and Open Space Activity Area – Watercourse (POS-W1, POS-W2, POS-W3)</p> <p>The erection or alteration of any building within the Open Space Activity Area – Escarpment and the Open Space Activity Area – Watercourse.</p>	Yes	<p>While there are no buildings proposed in POS-E2 or POS W2 and W3 there are three dwellings that extend slightly into POS-P3 and POS E6.</p> 
<p>vi Buildings – Private Open Space Activity Area – Pastoral (POS-P1)</p> <p>The erection of any non-farming building within the Private Open Space Activity Area – Pastoral 1.</p>	Yes	<p>Approximately 15 dwellings extend wholly or in part into the POS-P1 area and they are for residential purposes (not farming)</p>
<p>viii Building Platforms – Rural Living Activity Area</p> <p>a. The creation of a new Residential Building Platform additional to those identified on the Structure Plan.</p> <p>b. Any building located entirely outside of a Residential Building Platform shown on the Structure Plan.</p>	Yes	<p>There are a number of the proposed residential dwellings that will be located outside a residential building platform</p>
<p>ix Earthworks in Activity Areas E5 and E6</p>	Yes	<p>POS-P6 is a small rock outcrop and earthworks will be undertaken within this area</p>
12.32.5.1 Site Standards		
<p>ii Setback from Internal Boundaries – Private Open Space Activity Area – Pastoral</p> <p>The minimum setback from internal boundaries is 10m.</p>	Yes	<p>This applies to the dwellings proposed in POS-P1. The proposed dwellings will be located within 10m of their internal boundaries</p>
<p>vii Earthworks – All Activity Areas</p> <p>The following limitations apply to all earthworks (as defined in this Plan), except for:</p> <p>i. Earthworks associated with a subdivision that has both resource consent and engineering approval.</p> <p>ii. Earthworks in Activity Areas E5 and E6</p>	Yes	<p>While the earthworks will be approved via subdivision consent, engineering approval likely issues after resource consent approval and therefore it is preferable to obtain via land use consent.</p> <p>It is acknowledged that the earthworks within E6 are subject to a separate rule</p>
<p>ix Nature and Scale of Activities – Private Open Space Activity Areas</p> <p>Private Open Space Activity Areas shall not be used for the purpose of domestic curtilage activities, including gardens, paved areas, structures, parking (except for the purpose of a vehicle driveway).</p>	Yes	<p>The location of dwellings within POS-P1 will result in domestic curtilage activities</p>
12.32.5.2 Zone Standards		
<p>i Staging – Arrowtown South Special Zone</p> <p>a. No new residential unit shall be granted resource consent in the Arrowtown South</p>	Yes	<p>The proposal includes subdivision, overarching open space management plan and land use consent for dwellings within the same</p>

Special Zone prior to the approval of subdivision including an Overarching Open Space Management Plan in accordance with Rule 12.32.3.2 (ii).		application. So technically the subdivision and management plan will not have been approved prior to the lodgement of the resource consents for dwellings; this application requests the granting of resource consent for new dwellings prior to the approval of the subdivision and open space management, because these applications will be made concurrently.
v Building Setback from Roads a. Residential Activity Area 4.5m (other than garages) b. Rural Living Activity Areas 10m c. Private Open Space Activity Areas 20m	Yes	Dwellings within RL-1 will be located within 10m of Centennial Avenue, and future dwellings will be located within 10m of the proposed roads within the site. There will be dwellings within the POS-P1 area which is the private open space area, and there will be dwellings within 20m of the proposed road boundary
ix Density - Rural Living Activity Area a. There shall be no more than one residential unit per building platform. b. There shall be no more than 25 residential units located within the Rural Living Activity Area as follows: RL-1 3 RL-2 2 RL-3 2 RL-4 4 RL-5 6 RL-6 4 RL- 7 4 Total within site: 17	Yes	There will be a greater number of residential units; RL- 1 – 18 RL-2 – N/A (not within site) RL-3 – 4 RL-4- 16 RL-5- N/A (not within site) RL-6- 33 RL-7- 16 (plus 14 within POS-P1) Total within site (both RL areas and POS-P1): 101
c. Within the Rural Living Activity Areas RL-6 and RL-7 access from McDonnell Road shall be via the internal roads identified on the Structure Plan.	Yes	While the access to RL-6 will be via the road indicated on the structure plan, the road to access the central connection and that links to RL-7 is not in the location indicated on the structure plan. That road indicated is the driveway to the Muter homestead, and it is preferred that the access is separate
d. Rural Living Activity Areas RL-1, RL- 2, RL-3, and RL-4 shall gain access from Centennial Avenue from an internal road identified on the Structure Plan.	Yes	While the lots will gain access from an internal road, which is largely in the same location as that indicated on the structure plan, there are three additional access points onto Centennial Avenue. These are not providing direct access to the future dwellings, but they are not in the location indicated on the structure plan
e. Road intersection and crossing locations may be within 25m of the locations shown on the Structure Plan.	Yes	While some of the proposed roads are shown within 25m of the indicated locations on the structure plan, there are other road linkages that are not (for instance, the road connecting the lower site off McDonnell Road through to Centennial Avenue)
Chapter 15: Subdivision		
15.2.3.4 Non Complying Activities		

(xviii) In the Rural Living Activity Areas of the Arrowtown South Special Zone subdivision which results in lots that contain neither an existing or approved residential unit, nor a residential building platform (as identified on the Arrowtown South Structure Plan, or approved by rule 12.32.3.3 (i) shall be a non-complying activity except where the subdivision is for purposes of boundary adjustment, access formation or to create lots to be managed by the body corporate responsible for landscape management and ecological restoration.	Yes	All of the lots to be created will contain a residential dwelling, however, the application for the dwellings will be lodged concurrently with the subdivision and therefore technically have not gained approval prior to the subdivision application.
15.2.6 Lot sizes, averages and dimensions 15.2.6.3 Zone subdivision standards- lot sizes and dimensions		
Activity Area – Rural Living 1,500 m ² provided that the total lots to be created by subdivision for building platforms within the Arrowtown South Special Zone shall not have an average less than 4,000m ²	Yes	Proposed lot sizes will be below 300m ² in some areas

Overall, the proposal triggers resource consents for the proposed dwellings and for the subdivision. The proposal is a non complying activity.

The NES-FW and Regional Plans (Water and Air) have been checked and based on the information available, it is likely that there will be no resource consents triggered. In particular, Clause 54 of the NES-FW has been checked, and

the development could discharge any s/w flows to the constructed wetland (attenuation) at the downstream end and thereby ensure a minimum 100m offset to the natural wetland. It will mean potentially larger and deeper stormwater pipe runs but it is possible to comply with 54c below.

This is because the development is separated from the natural wetlands and the works required to construct the road connections can be undertaken in such a way that they achieve the permitted activity standards. This can be assessed further once detailed design has been undertaken, and as a precautionary approach, it is acknowledged that while unlikely, resource consent may be triggered. This recognition ensures that, in the event that the detailed design demonstrates that such consents are triggered, the effects of such can be included in the application to the EPA, and there is scope to assess and approve those works.

At this stage, and based on the information available, it is feasible to undertake the works in such a way that resource consents are not triggered under the NES-FW or the Regional Plans.

However, as above, a precautionary approach is taken such that it is acknowledged that those consents may be triggered, and if that is the case, then there is scope to assess them.

- 14. Other legal approvals (other than contractual) that you consider may be required to start the project (eg, authorities under the Historic New Zealand Pouhere Taonga Act 2014, the Building Act, or concessions under the Conservation Act 1987)**

Building consents will be required for residential dwellings under the Building Act 1991.

There are interests listed on the title. These are outlined in the table at Annex [L], and as outlined, none of them cause an impediment to the development.

- 15. A statement of whether you have already applied for resource consent or lodged notices of requirement under the RMA for the same or a similar project. If so, provide the details and any decisions.**

Resource consent has not been applied for.

- 16. A description of whether and how climate change and natural hazards would affect the project (see 'Appendix – Climate change considerations').**

The site is not subject to significant natural hazards, in particular, the site is not subject to flood hazards which could be exacerbated by climate change. Built form will be setback from the water course. The most significant natural hazard risk is earthquake and this risk will be accounted for in the building design, and development will be undertaken in accordance with geotechnical recommendations.

- 17. A statement of any compliance or enforcement actions against you by a local authority or EPA under the RMA, and the outcome.**

Not relevant; no enforcement action has been taken.

Determining whether the project will promote the purpose of the Act (section 19)

To assess whether a project will help achieve the purpose of the Act, the Minister may have regard to the following matters, assessed at the level of detail the Minister considers appropriate:

- (a) the project's economic benefits and costs for people or industries affected by COVID-19**

Queenstown's economy has been hard-hit by Covid 19. The project will provide employment during construction and importantly will provide housing supply in a location where there is very limited capacity. Importantly, the location supports the creation of a well functioning urban environment given the site's connection to the existing Arrowtown settlement.

The economic benefits of BR has been addressed at Sections 6 and 7 of the Economic Report (Annex [E]), which finds:

In short, the economic role of the BR suggests that the development is expected to generate approximately s 9(2)(b)(ii) in direct expenditure over the coming five years. This would

support total economic activity of \$37 million in GDP and employment of 495 employment years² between 2022 and 2027 in the Queenstown Lakes economy.

Also, as discussed in the Economic Report, by locating development adjacent to the existing settlement, the cost of infrastructure is less than, for example, greenfields development physically separated from existing settlements. This is because with minimal upgrades, the development can connect to reticulated services.

(b) the project's effect on the social and cultural well-being of current and future generations

The project will have positive effects on the social and cultural wellbeing of current and future generations through the provision of housing supply in close proximity to an existing settlement. The site can connect to reticulated services and it is adjacent to the existing residential area of Arrowtown. The project will contribute to a well functioning urban environment in a location where development can be absorbed without adversely affecting amenity or landscape values.

(c) whether the project would be likely to progress faster by using the processes provided by this Act than would otherwise be the case

The process of consenting under the RMA, despite refinements, is a fraught one and timeframes for resource consents in the Queenstown Lakes District are becoming longer and longer. This is evidenced by the note sent to applicants when lodging resource consent applications with QLDC. This reads:

Unfortunately, we currently have delays of 2-3 weeks before a planner will be able to look at your application or request.

We are working hard to extend our capacity to manage this situation, and ask that you please be patient during this time, knowing that we are endeavouring to allocate your resource consent application or preapplication meeting request as quickly as possible.

It is not unusual for a notified or limited notified resource consent to take more than a year to process. Small scale applications that are not notified generally take more than the 20 working days. Experience is also that an applicant can spend significant time working with the Council to try to achieve non notification (e.g many months).

The following examples are of small scale proposals within the Arrowtown South Zone:

RM191161 – application to subdivide a site at 160 Centennial Avenue into two lots lodged 21 October 2019. Application notified 22 January 2020. No submissions were received, so a decision was made pursuant to Section 100, and the Section 104 decision was issued on 4 August 2020. **Ten months to obtain approval to create one new title.**

RM220171 – application to subdivide a site at 152 Centennial Ave into two lots. Resource consent lodged 14 March 2022. Decision to notify 17 May 2022. Submissions closed 24 June

² Total Employment Count, which is equal to Count of employment and working proprietors.

2022. One submission received from Fire and Emergency. (It is understood that this application is now on hold).

The following outlines the process and timeframes for the Tewa development, at the south eastern edge of Arrowtown.

RM210219 – Tewa. This site was incorporated into the District Plan Review in Stages 1 and 2, which commenced in 2015. Hearing of submissions on the zoning was undertaken in 2018, and the decision to change the UGB and Zone (from rural to residential) was issued in March 2019.

Resource consent RM210219 was lodged on 17 March 2021. Resource consent was approved non notified, on 5 April 2022. **13 months to gain approval for a non notified consent.** This approval followed a plan change process that took four years.

Because the small scale subdivision applications within the Arrowtown South Zone were publicly notified, it is anticipated that the BR proposal would be notified also. Given the larger scale of the project it is likely to receive submissions, particularly from Arrowtown landowners wishing to 'protect their patch'.³

Based on experience it would likely take well over a year to progress through the Council process. Despite statutory timeframes, the Council (like many others) will often ask for more time to assess an application, obtain peer review reports, etc, which an applicant usually agrees to in order to avoid a potentially adverse notification or substantive decision (including on conditions). The QLDC currently state the following in their email to applicants:

We will contact you once your resource consent application or pre-application request has been allocated to a planner. The planner may also be in touch about the use of Section 37 on your resource consent application. The Resource Consents team has recently been looking into the use of Section 37, providing guidance to staff to help identify applications early in the process that would be considered more complex and where special circumstances warrant the use of Section 37 to extend timeframes.

From experience, QLDC planners request the use of Section 37 on most resource consents, whether complex or not. This is indicative of the difficulties in processing resource consents within the statutory timeframes.

If an application is notified there is also potential for Environment Court appeals (and beyond). If an application is appealed then the timeframes are further extended well beyond a year.

The applicant does not see the fast track process as short-cutting a proper evaluation, and the limited appeal rights also present a risk for the applicant. However, they wish to progress the project with as little delay as possible so that there is some certainty that the development can proceed. As expressed in the Economic Report, there is a shortfall of housing within Arrowtown, and use of the Fast Track process enables a prompt response to that shortfall.

There is a real risk that if processed under the normal resource consent framework then delays could be significant, taking up to three years. The Tewa plan change and consenting process is

³ There is a likelihood that landowners within Arrowtown prefer to retain the UGB in its current location, and would argue against Arrowtown providing more housing supply.

an example of that extensive timeframe, and in that case the resource consent took over one year even though it was processed non notified.

As stated at page 23 of the Economic Report:

Given the demand and the impending shortage of residential lots in Arrowtown outlined in the QLDC assessments and described above, it would be prudent to enable the development of the BR land as quickly as possible. If, as predicted, the current housing shortage in Arrowtown continues, the price of land (which has already escalated significantly in recent years) could increase further, which will continue to negatively impact the affordability of housing.

Because of these factors, it is likely that this project will progress significantly faster (by up to three years) by using the processes provided by this Act. Given the findings of the Economic Report, it is important that this supply is provided urgently.

(d) whether the project may result in a public benefit by, for example,—

(i) generating employment:

As identified in the Economic Report,

the BR development will generate approximately 447 FTE over the 5 years in the Queenstown Lakes economy. Of these jobs around 250 FTE are direct employment related to the land development and construction. Notwithstanding the likely transfer effects, the Arrowtown community and economy will benefit from additional economic activity that BR will generate in the local area.(page 31 of Annex [E]).

(ii) increasing housing supply:

The project will increase housing supply by approximately 104 single dwellings, and each lot could also contain a secondary unit.

As stated in the Economic Report (Annex [E]) there is an impending shortage of residential lots in Arrowtown.

The report finds at page 22 that:

In summary, based on these figures we consider that there is a shortage in the supply of land for residential development in Arrowtown now, which will become more pronounced unless additional capacity is provided as a matter of urgency. If demand continues at the current rate and no new supply is created this shortage can be expected to reach 150 dwellings in 2025. Even if the QLCHT and BR developments begin immediately the shortage may not be completely alleviated, and would only provide sufficient supply to satisfy demand up until 2026. (page 22)

(iii) contributing to well-functioning urban environments:

The project is located adjacent to Arrowtown residential areas. To the south it is bounded by rural residential properties and the Arrowtown Golf Course. Pedestrian and cycle connections can be provided through the site, connecting McDonnell Road to Centennial Avenue.

The project will contribute to a well functioning urban environment, given its proximity to Arrowtown, and the ability to create a well designed subdivision that connects to the existing settlement.

The location of BR contributes to a well-functioning urban environment by providing dwellings in close proximity to a major centre, which will also have positive effects in reducing greenhouse gas emissions. The proposal would also support efficient use of infrastructure, and more efficient access to infrastructure than in other alternative greenfields locations which require new networks to be constructed.

(iv) providing infrastructure in order to improve economic, employment, and environmental outcomes, and increase productivity:

The project will connect to existing infrastructure, and the limited upgrades that are required represent efficiencies.

(v) improving environmental outcomes for coastal or freshwater quality, air quality, or indigenous biodiversity:

The project proposes to retain over 60% of the site as open space, and these open space areas will be managed via an Open Space Management Plan. The Management Plan will provide a programme of revegetation and weed control, resulting in ecological restoration of both the escarpment face and the wetland areas. This will result in improved environmental outcomes for both freshwater and indigenous biodiversity.

Air quality will be maintained with restrictions imposed on wood burning fires.

With over 60% of the site retained as open space and to be planted in indigenous vegetation, the proposal provides increased housing supply while also improving environmental outcomes. Its location adjacent to the existing settlement, and on the public bus route also contributes to lower carbon emissions when compared to greenfields sites that are physically separated from the centres. This is also the case when considering the construction work involved to connect the development to reticulated services. In this instance, because of the location of the site and therefore the minimal upgrades to infrastructure, its 'footprint' in this regard is much lighter than other developments.

(vi) minimising waste:

It can be argued that providing only 17 lots within the site is a waste of available land. Providing for smaller sites, that will accommodate smaller homes, also reduces the waste involved in large scale houses that accommodate only a small number of people.

Mechanisms to reduce waste can be adopted during the construction phase.

(vii) contributing to New Zealand's efforts to mitigate climate change and transition more quickly to a low-emissions economy (in terms of reducing New Zealand's net emissions of greenhouse gases):

In broad terms, locating increased residential density adjacent to an existing settlement contributes to enabling the community to reduce reliance on private vehicles. House designs will incorporate energy efficiency and their small scale contributes towards a lower emissions economy.

In its recently adopted “Climate Change and Biodiversity Plan⁴” the QLDC has identified the following actions with respect to ‘providing a springboard for district wide climate and biodiversity action:

1.8 Deliver integrated spatial planning decisions on land use, urban development, transport planning and natural corridor networks which help to reduce emissions, restore indigenous biodiversity, and improve climate change resilience across the district. The below is a focus of the joint priority initiatives:

The following addresses each of the QLDC’s priorities, demonstrating how this project achieves them.

a) Higher density dwellings generally require less energy to heat.

The proposal achieves an increased density from the 17 lots provided for by the Arrowtown South Zone to over 100 dwellings. Each of these lots can contain a primary and secondary dwelling. Given their smaller size (when compared to the 17 lots that provide building platforms of over 500m² in area) the future dwellings will require less energy to heat. A small area can contain 100 homes, while retaining the more sensitive areas as open space. The sites gain good solar access, being able to achieve a generally northerly aspect, located away from the foot of the mountains.

b) Creating live-work-play neighbourhoods reduces the distance people need to travel.

BR is located in close proximity to Arrowtown, and walkway and cycleway connections will link the neighbourhood to the primary school, recreation areas and the town centre. The location of the site and its design enables the creation of a live-work-play neighbourhood that is well connected to existing services. This effectively reduces the distance that people need to travel.

c) Locating more houses near quality public transport and active transport, providing an attractive alternative to travelling by car.

As identified in the Traffic Report (Annex [D]), by ensuring that the road design can accommodate the local bus, the bus route can be altered slightly (and easily) to link the project into the existing bus network. Walkway and cycleway connections are provided throughout the site, and this improves connectivity not only for the site, but for the wider area, given that it provides greater connection between development on McDonnell Road and the services and connections on Centennial Avenue.

Importantly, this neighbourhood will be in walking distance to the local primary school. Given its location and design this proposal provides attractive alternatives to travelling by car.

d) Enabling active travel through provision of active travel networks and associated infrastructure.

The proposal provides for active travel, with connections provided through the site, linking McDonnell Road to Centennial Avenue, and an efficient means of connecting with the public

⁴ 2022-2025 Climate and Biodiversity Plan for the Queenstown Lakes District adopted by the full Council on 30 June 2022

bus route. Because of its location and design the proposal enables active travel with little investment required to upgrade infrastructure.

- e) Designing compact settlements that reduce the requirement for new infrastructure, and the associated embodied carbon in construction. Encouraging mode shift to public transport to reduce emissions.*

BR represents a compact settlement, particularly when compared to the anticipated density. Because of its density and location adjacent to Arrowtown the requirement for new infrastructure is reduced. This is because it can easily connect into the existing services, reducing the embodied carbon in construction of new infrastructure services. Its provision for connections to the public transport helps to encourage mode shift and the consequent reduction in emissions.

- f. Develop an interconnected network of open spaces, reserves, and natural corridors to support improved biodiversity outcomes that honour the mauri of our district.*

BR contributes to the development of an interconnected network of open spaces, reserves and natural corridors. The proposal, which will retain 62% of the land area as open space to be replanted, will support improved biodiversity outcomes. The escarpment and wetland areas will improve natural corridors, supporting biodiversity outcomes. This will be achieved while also increasing housing supply in a location adjacent to the existing settlement.

Overall, the proposal, given its location and design, will contribute to achieving the QLDC's Climate Change and Biodiversity Plan, and in turn, will contribute to New Zealand's efforts to mitigate climate change and transition more quickly to a low-emissions economy.

(viii) promoting the protection of historic heritage:

The site contains two listed heritage buildings, being the Muter Homestead and the woolshed, which is currently under restoration via the recently approved resource consent RM200620. These sites have been recognised and provided for in the Master Plan, and will not be affected by this proposal. This is achieved through retaining generous setbacks from the buildings, retaining large sites around them and retaining separate accesses.

Arrowtown's heritage is associated with small scale cottage-like dwellings. This proposal will contribute to the retention of that character, given that it provides a range of smaller sections, and the dwellings will be subject to design controls that reflect and build upon the Arrowtown Design Guidelines.

It is considered that providing a range of section sizes and smaller dwellings (than a lower density development) better contributes to retaining the character of Arrowtown. Large rural living dwellings set on landscaped grounds are not characteristic of Arrowtown and do not contribute effectively to a well functioning urban form. The smaller scale dwellings are more consistent with Arrowtown's historic character.

The heritage values associated with Arrowtown will be respected and historic heritage will be protected.

(ix) strengthening environmental, economic, and social resilience, in terms of managing the risks from natural hazards and the effects of climate change

The site is appropriately located in terms of natural hazards. Environmental resilience is improved through the replanting of the water course and the escarpment, improving biodiversity values and maintaining and enhancing water flows. This will reduce the risks associated with flooding.

Economic resilience would be strengthened through the creation of additional jobs and the contribution to the local economy. Arrowtown's property prices have increased significantly and the population is declining. Providing a supply of housing will help strengthen the settlement's social resilience, providing greater opportunity for local families to reside in Arrowtown.

Retaining the areas of open space and their planting and ongoing management will help to reduce the effects of natural hazards and effects of climate change.

(e) whether there is potential for the project to have significant adverse environmental effects, including greenhouse gas emissions

There is not potential for the project to have significant adverse effects.

(f) any other matter that the Minister considers relevant.

The applicant could undertake a subdivision to provide 17 residential sites. Such an application would be a controlled activity, and therefore unlikely to be publicly notified. Development would be cheaper and faster, and the development would be financially lucrative, with large sites such as this in high demand.

The applicant instead wishes to undertake a residential subdivision to create over 100 lots. Over the past year the applicant has attempted to engage with the QLDC to have the site included in the District Plan Review. However, the timeframes for its inclusion in the review have been pushed out, and there is still no certainty as to when this may happen.

In the meantime, land owned by the Council (also located adjacent to the Arrowtown residential zone) was included in the District Plan Review, subsequently was included within the Urban Growth Boundary, and zoned residential. It would be logical to enable the subject site to be rezoned also. Such rezoning and the proposed residential development is consistent with the Council's WBLUS.

However, while it has been acknowledged by the Council that the site can absorb urban development (WBLUS), and that Arrowtown's growth pressures are significant and there is limited supply, there has been no undertaking from Council that the site will be included in the District Plan Review.

The Fast Track process would enable this development to progress significantly faster than if it were to be processed under the RMA. There is a shortage in the supply of land for residential development in Arrowtown now, which will become more pronounced unless additional capacity is provided as a matter of urgency. This proposal would alleviate some of that shortage.

While the application is a non complying activity and would be assessed against the objectives and policies of the Arrowtown South Zone, there is a pathway to gain consent approval. This is because of the significant benefits of this project.

Further, it accords with the NPS-UD, and achieves housing supply while maintaining and enhancing biodiversity values.

It is considered that while this proposal is consentable, if processed under the RMA that process would potentially take a significant amount of time. It is therefore requested that it is processed under the Covid Fast Track legislation.

This application is supported by the following reports:

Annex A – Concept Plans

Annex B- Urban Design Report

Annex C- Landscape Report

Annex D- Traffic Report

Annex E- Economic Report

Annex F- Ecological Report

Annex G – Letter from Kai Tahu ki Otago

Annex H – Infrastructure

Annex I- Resource consent RM200620 (wedding venue)

Annex J- Rules table

Annex K- Design controls and extract from Arrowtown Design Guidelines

Annex L- Title document and table of interests