

FORM 5

SUBMISSION ON NOTIFIED PROPOSAL FOR PLAN CHANGE

Clause 6 of Schedule 1, Resource Management Act 1991

To Central Otago District Council

Name Te Whatu Ora, National Public Health Service – Southern, hereafter identified as NPHS

1. This is a submission on the change proposed to the following plan (the proposal):

Proposed Plan Change 19 to the Central Otago District Plan

2. NPHS could not gain an advantage in trade competition through this submission.

3. Background to submission

This submission has been compiled by Te Whatu Ora, National Public Health Service - Southern. The National Public Health Service recognises its responsibilities to improve, promote and protect the health of people and communities of Aotearoa New Zealand under the Pae Ora Act 2022 and the Health Act 1956.

This submission advocates that any potential health risks are effectively mitigated by Plan Change 19 (PC19).

Public health relates to ensuring that places and spaces where people live, learn, work and play, contribute to good health. Public health work focuses on the things that are outside individual control but affect the ability to live a full and healthy life. Public health action aims to create environments and conditions that prevent harm and support health and wellbeing in the first place. Within the land use planning context, public health outcomes can include factors such as good air quality, access to clean drinking water, residential housing quality, a quiet acoustic environment, and increased opportunities for safe physical activity. Ensuring the attainment of these outcomes can lead to a variety of public health benefits, including a reduced risk of chronic disease, cancers, and disability. While healthcare is important to those who already have disease or disability, working at a community and environmental level is also key, as it can reduce the prevalence of the factors that result in that disease or disability.

Public health takes an evidence-informed approach to building healthy communities and environments. These activities are delivered in partnership with a range of groups and organisations.

It is from this basis that NPHS submits on PC19.

4. The specific parts of the Plan Change thereto to which this submission relates to are shown in the attached schedule including whether we support, oppose or are neutral regarding the specific parts or wish to have them amended, and our reasons are stated.

In summary the National Public Health Service:

- a) Supports Plan Change 19 as set out in this submission and in the specific relief sought in the attached schedule.
- b) Opposes mandatory provision for parking in medium-density zones.
- c) The reasons for our position are as follows:
 - (i) PC19 will improve and simplify the Central Otago District Council district plan and that the changes reflect the spatial planning work done in the Cromwell and Vincent Communities since 2017.
 - (ii) The plan incentivizes urban growth to be close to the commercial zone and that the higher density of urban dwellings provide for more active transport and social interaction.
 - (iii) Mandatory allocation of parking spaces in the medium density zone is a disincentive to compact growth, active transport and social interaction.
 - (iv) Policy decisions to reverse the upward trend of new building in rurally zoned land are supported as this type of development is unsustainable in the long-term.

5. The National Public Health Service - Southern will wish to be heard in support of this submission.

6. If others make a similar submission, NPHS will not consider presenting a joint case with them at a hearing.

Signature:



Tom Scott, National Public Health Service

Date:

Electronic address for Service: tom.scott@southerndhb.govt.nz

Telephone: 03 476 9746

Postal address (or alternative method of service under section 352 of the Act):

National Public Health Service - Southern

Public Health Service
Private Bag 1921
Dunedin 9054

Contact person: Tom Scott

Note to person making submission

If you are making a submission to the Environmental Protection Authority, you should use form 16B. If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.

Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least 1 of the following applies to the submission (or part of the submission):

- it is frivolous or vexatious:
- it discloses no reasonable or relevant case:
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further:
- it contains offensive language:
- it is supported only by material that purports to be independent expert evidence but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

Schedule

Provision	Position and Submission	Decision Requested
<p><i>Changes 1 -6</i></p> <p>Amending planning maps to create a new Residential Zone Section comprising.</p> <ul style="list-style-type: none"> • a Large Lot Residential Zone chapter; • a Low Density residential Zone chapter; • a Medium Density Residential Zone chapter; and • a Residential Subdivision chapter. 	<p>Support</p> <p>We support the proposed rezoning in that it serves to simplify the zoning which in turn clarifies the public health expectations of each of the new Zones. This zoning effectively operationalizes the Spatial Planning work that has been facilitated by CODC since 2017.</p>	<p>Should PC19 be confirmed, retain Changes 1 – 6 in their current form.</p>
<p><i>Planning Maps</i></p> <p>As amended by new Zone definitions and spatial planning work completed in the Cromwell and Vincent Wards.</p>	<p>Support</p> <p>We support the spatial distribution of the new zones in that this was supported by community consultation. We also support the concept of medium density residential zoning close to the commercially zoned centre of the towns of Cromwell, Clyde and Alexandra. This provides an environment that supports active transport and social interaction within that zone.</p>	<p>Should PC19 be confirmed, the distribution of zones be retained in their current form.</p>
<p><i>Change 46 Amend Standard 10.6.6(i)</i></p> <p><i>(2) (ii)</i> Car Parking: A minimum of one carpark space per household unit shall be provided on site</p>	<p>Oppose</p> <p>Consideration needs to be given for removing the requirement for mandatory car parking for households living in higher density areas in that it serves to maintain the current “car culture” that in turn disincentives active transport and social interaction. It should be noted that overseas jurisdictions are moving away from such mandatory provisions that lead to unsustainable land use and contributes to adverse air quality.</p>	<p>Should PC19 be confirmed, 2 (i) be removed as it applies to medium-density residential zones.</p>

Objective MRZ As amended by 31 6.2.6

Objectives for the Medium Density Zone:

2. provides a range of housing types, including those of a greater density than other residential zones, making efficient use of land and providing for growth needs;
3. is responsive to and well-connected into the surrounding area;
4. is well-designed, balancing affordability with good urban design outcomes;

Support

We support this in that CODC like many Territorial Authorities have an excess of 3 – 4 bedroom houses. This will allow for a variety of housing types and in particular smaller houses that are better suited to single or retired people. We support the concept of connectivity and especially to the commercial area. The extensive network of greenways in Cromwell are an asset that must be preserved. We also support the concept of affordability in that access to affordable housing is a well-recognized issue for CODC. We note that both communities are impacted by adverse air quality during periods of temperature inversion in the winter. We wonder what planning enablers could be applied to facilitate communal heating options for this zone.

Should PC19 be confirmed, retain MRZ – 02 Objectives and investigate what enablers could be put in place to facilitate community heating options.

Objective LLRZ As amended by 31 6.2.6

The Large Lot Residential Zone is a pleasant, low-density living environment, which:

1. contains predominantly low-rise and detached residential units on large lots;
2. maintains a predominance of open space over built form;
3. provides good quality on-site amenity and maintains amenity values of adjacent sites; and
4. is well-designed and integrated into surrounding area

Support in part

While this zone is necessary to meet certain demands of the market, it is not a zone that we would support for public health or sustainability reasons. Our concerns relate to inefficient land use, the need for vehicles to access work or services as well as the disincentive towards active transport or social interaction. Given that most new residential development in CODC of recent years has been rural, we support any processes to disincentivize this type of development in future.

We support CODC's policy direction that limits large lot development to section sizes of more than one hectare or alternatively provide for connection to a reticulated network.

Should PC19 be confirmed, the land set aside for this zoning needs to be kept to the absolute minimum. We would support additional controls on rurally zoned land to try and incentivize future development in the medium density zones.

We support the requirement for any large lot developments of less than 1 hectare to be reticulated with a water supply and sewerage.