

Resource Management Act 1991

Submission on Notified Proposed Plan Change to Central Otago District Plan

Clause 6 of Schedule 1, Resource Management Act 1991

(FORM 5)

To: The Chief Executive
Central Otago District Council
PO Box 122
Alexandra 9340

Details of submitter

Name: ANDREW JAMES WILKINSON

Postal address: ___PO Box 328 Cromwell 9342_____

(Or alternative method of service under [section 352](#) of the Act)

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Contact person: ___Andy Wilkinson_____

(Name & designation, if applicable)

This is a submission on proposed Plan Change 19 to the Central Otago District Plan (the proposal).

I am / am not* a trade competitor for the purposes of [section 308B](#) of the Resource Management Act 1991 (*select one)

***I / am (select one) directly affected by an effect of the subject matter of the submission that:**

- (a) adversely affects the environment; and**
- (b) does not relate to trade competition or the effects of trade competition.**

**Delete this paragraph if you are not a trade competitor.*

The specific provisions of the proposal that my submission relates to are:

(Give details, attach on separate page if necessary)

Rezoning of Residential Resource Area 2, Cromwell Ward

This submission is:

(Attach on separate page if necessary) Include:

- *whether you support or oppose the specific parts of the application or wish to have them amended; and*

- *the reasons for your views.*

I OPPOSE the application for rezoning large areas of RR2 from 4,000 sq/m to 1/8th of the size at 500 sq/m - Low Density Residential. The area is substantially developed and the change has significant detrimental effect to the residents of the area with very little gain in respect to the objectives of the plan change. Details of submission are attached.

I / We seek the following decision from the consent authority:

(Give precise details, including the general nature of any conditions sought)

Reject the proposal to rezone Residential Resource Area 2 to Low Density Residential

- **I oppose the application ~~OR neither support nor oppose~~ (select one)**
- **I wish to be heard in support of this submission (select one)**
- ***I / We will consider presenting a joint case if others make a similar submission**
**Delete this paragraph if not applicable.*

In lodging this submission, I understand that my submission, including contact details, are considered public information, and will be made available and published as part of this process.



21 August 2022

Signature

Date

Submissions close at 4pm on Friday 2 September 2022

Submissions can be emailed to districtplan@codc.govt.nz

Note to person making submission:

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 a 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.*

OBJECTION TO PLAN CHANGE 19

Part of Form 5

I am Andrew James Wilkinson of 15 Scott Terrace, Cromwell.

I object to the provision with Plan Change 19 that seeks to change the lot sizes of the majority of Residential Resource Area 6 (RRA6) from 4,000 sq/m to Low Density Residential Zone at 500 sq/m.

I do not agree that the objective of Plan Change 19 will be achieved by its implementation.

I also seek clarification on the plan change related to RRA6 given the wording within the "Plan Change 19 Appendix_Residential_Chapter_Provisions" is in conflict with a map provided and emails from the planning department of CODC. The wording in the appendix declares RRA6 is to be redesignated Large Lot Residential Zone, however the map displays most of RRA6 as Low Density Residential. A query to the CODC planning department has resulted in two conflicting emails on the actual designation of lot sizes for RRA6.

Plan change 19 is based on the premise that the Cromwell Spatial Plan should be relied upon as the instrument for the definition of anticipated growth for the town of Cromwell and the premise that the growth needs to be contained within the existing boundaries. It is my opinion that the spatial plan cannot be relied upon for either of these. The anticipated growth of Cromwell will be substantial, that is not in question, however the extent of that growth needs to be further analysed with more recent data to consider changes in demographics and growth from the last 3 years and the recent information from financial institutions indicating the housing shortage as called out by the government will become a housing oversupply within 12 months. New economic modelling of the anticipated growth should be reassessed before Plan Change 19 is applied to substantially change the lot sizes of existing areas which cannot be recovered if new modelling shows a much-reduced need for the yield within current boundaries.

The Cromwell Spatial Plan assumes growth must be contained within the town boundaries. Given the land size and availability in areas surrounding the town this policy of town containment must be challenged. Towns need to grow with character and ambience – not just density. A drive through the new Wooing Tree Estate will paint a picture of what Cromwell will become if density is the only driver of planning. The wall-to-wall housing, lack of parking, lack of open spaces, no yards for play or leisure, no privacy, no character will become the Cromwell legacy from the council should density be the defining driver for future plans.

Plan change 19 is also based on the premise that the Cromwell Spatial Plan housing yields will be achieved by the re-designation of residential areas from the current RRA zones to the new to the proposed density zones. The plan indicates only two of the proposed new designations actual increase density and many others decrease density. Also these new zones assign a density model that incorporates within zones, the areas that will not – or should not change, being schools, sports grounds, greenways and pathways. More detailed clarity on the actual yield of housing should be provided and independently assessed.

Within the plan change document the wording explains the need to *maintain the amenity and character resulting from existing or anticipated development in these areas*, therefore recognising the very need to respect the investment made by residents within RRA6.

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Objectives and Policies
LLRZ-03 – Precincts 1, 2, & 3

The density of development in the Large Lot Residential Precincts recognises and provides for maintenance of the amenity and character resulting from existing or anticipated development in these areas.

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Yet the changes proposed seek to do exactly the opposite for a large percentage of the area, but not for all of it. There seems to be recognition of the damage the change will do to an existing part of the RRA6 residential area at the Lake Dunstan edge but fails to recognise the damage that will apply to all residents of this area.

Residential Resource Area 6 is substantially developed and has been for over a decade. This is not a new subdivision but also not an aging one and very little land remains for additional development. The placement of houses within the 4,000 sq/m blocks seeks to provide a residential area that has substantial dwellings with open spaces, permitting fruit trees, gardens and an urban/rural ambience that residents have selected as their homes. There is little to be gained but a large amount to be lost in changing the lot sizes within this already developed neighbourhood. Pockets of lots 1/8th the size of surrounding lots and dividing off small areas behind or to the side of existing dwellings will create an area of chaotic urban landscape that seemingly has no plan or direction.

The current RRA6 area has a mix of housing that has primarily been established in the last 15 years. Investment into the houses and landscaping has been significant and has created a neighbourhood of high quality and attractive residences. There have been multiple applications for sub-division rejected by council on the very grounds of the need to maintain the character and ambience of RRA6. The proposed change will create a conflict between the long-term residents who have chosen to buy or build in the RRA6 area for quality of life, and the opportunists and developers who will seek to capitalise on small scale subdivision of 4,000 meter blocks into patches of urban jungle by the demolition of quality houses to fit eight into one. Conceptually there would be no town development that would ever be planned in this way. There seems to be a sense of desperation by the council in incorporating this retrospective model into plan changes.

The area has limited traffic access across SH8B. The allowance of high-density development of the Wooing Tree Estate with narrow roads and no greenways or pathways is a pending catastrophe once the estate becomes occupied. Access for residents to RRA6 and more importantly for emergency vehicles will be difficult and dangerous. Adding more lots into the area will add to this traffic.

If the objective is to house significant growth in the Cromwell population this is not the areas to achieve that goal.