

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

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(Name & designation, if applicable)

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

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

The specific provisions of the proposal that my submission relates to are: (Give details, attach on separate page if necessary)

The creation and changing of density zones

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 am opposed to the plan change 19.

I don't believe these changes are in the best interest for Cromwell and its stakeholders, I also don't believe they are aligned with the NPS (National policy statement), CSP (Cromwell spatial plan) or what the CODC have been saying for many years in regards to infill.

The NPS is meant to direct councils to remove overly restrictive planning rules and plan for growth, both up, out and allowing denser housing. Plan change 19 appears to oppose these directions for a large part of Cromwell, applying the NPS ruling to random, small areas of the town. There is little insight to if this change will increase or decrease the number of houses in Cromwell

The CPS is about making sure Cromwell has affordable housing and density in the right location. Some of the key components to this is to ensure housing locations are within walkable distance from town facilities and ensure that new development is kept within the style. A 15 min or 1.2km walk is considered walkable, this also helps with zero emission transport (walking and biking) goals and reduce the town's carbon footprint. A 1.2km radius from the mall covers the majority of cromwell facilities. The Plan Change 19 proposed boundary marginally includes part of this walkable area of Cromwell.

Affordable housing is about supply and demand, and changing a large area of Cromwell from 250sqm sections to min 500sqm will negatively affect supply to a level that will impact affordability. Lack of hotel zones is also going to increase demand for airbnb which will also increase the pressure on affordability of housing.

The proposed Plan Change 19 lines don't seem to have much reason to them. If we follow the CPS and NPS, priority should be given to the sections closest or walkable to key locations where most people work, study, play to increase zero transport opportunities and decrease Cromwell's carbon footprint. The eastern part of town is very close to two schools, the lake, the mall, the art and old cromwell precinct (and current golf course, less weight to this one) but yet 80% of these section densities are moving to 500 sqm minimum, despite currently being no more than 840sqm (on average). Compared to the western part of wanga drive and the last stage in gair ave, which is a lot further away from where people work, study and play. The density here is much higher despite distance from key locations. Hence these plans being in opposition to the CPS and NPS policies to remove overly restrictive planning rules and plan for growth, both up out and allowing denser housing closer to facilities.

With most sections being just over 800sqm, the possibility of subdividing to 500spm is impossible. This will significantly decrease the supply of sections available. In turn, this proposed policy will also decrease the value of the current properties with the ability to subdivide.

People's property is what I would call a lottery.

An example of this would be 3 and 4 Coleraine street in Cromwell. Both on the same street.

3 Coleraine street is closer to 2 schools, however both houses are less than 400m away from the schools, and less than 800m from the mall. This proposed change will put pressure on the value of these two homes away from each other simply because of the new density boundaries.

For some local Cromwell residents, this will devalue their properties that they may have lived in for 30+ years. And for no reason other than a proposed boundary. Their house is worth less, in many cases this is their retirement money.

In the extreme case of a run down building that is not variable to bring up to healthy homes standard in accordance with NZ rental laws, the change will make these properties a lot harder to economically stack up for landlords. This again will lead to a decrease in housing supply, discouraging the upgrading to better house stock.

I seek the following decision from the consent authority:

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

I think the whole Traditional Cromwell boundary should be kept as the one zone with either 250 or 200sqm minimum section size, or 250 with 200 discretionary.

I feel that either of these three options would be in keeping with the NPS and CSP and would deliver a better outcome for all of Cromwell stakeholders.

- I oppose the application
- I wish / do not wish to be heard in support of this submission (select one)
- *I will consider presenting a joint case if others make a similar submission

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.

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ubmissions close at 4pm on Friday 2 September 2022

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

^{*}Delete this paragraph if not applicable.

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.