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CODC

SUBMISSION ON A PUBLICLY NOTIFIED PROPOSAL FOR PLAN (VARIATION)

TO: Central Otago District Council (“**CODC**”)
NAME OF SUBMITTER: Fulton Hogan (“**Submitter**”)
ADDRESS FOR SERVICE: As specified below

Introduction

1. This is a submission on proposed plan change referred to as Plan Change 19 (PC19) which involves the rezoning of land for residential use.
2. CODC has explained the purpose of the Plan Change as follows:

Plan Change 19 (PC19) has been driven by the direction set out in the Vincent and Cromwell Spatial Plans. The spatial plans have been prepared by Central Otago District Council to respond to demand for residential land and housing affordability concerns in the District, and to plan for the anticipated growth over the next 30 years.

PC19 is also part of the Council’s District Plan Review programme, and therefore seeks to undertake a comprehensive review of the current provisions applying in residential areas. It therefore applies to all existing Residential Resource Areas, including those outside areas covered in the spatial plans.

...

A Future Growth Overlay is also applied to areas identified for residential development in Stages 2 & 3 of the Vincent Spatial Plan. The Overlay does not alter the existing zoning, but signals areas where future growth is anticipated to be accommodated, subject to future more detailed consideration, particularly in terms of servicing.

Specific provisions of the Plan Change that the submission relates to

3. The Submitter has an interest in the entire Plan Change, and in particular the identification of areas subject to the Future Growth Overlay (**FGO**) and location of residential zones.
4. The Submitter owns the land legally described as:
 - Section 64-65 Block IV Wakefield Survey District (WSD) as contained in Title OT10B/1452 (67.8380ha);
 - Part Section 62-63 Block IV WSD and section 1 Survey Office Plan (SOP) 365897 and section 4 SOP 557380 as contained in Title 1019401 (50.3315 ha).
5. The street address for the property is 922 Luggate-Cromwell Road (SH 6), Cromwell. The property is 118 hectares in area and operates as working gravel quarry and yard based industrial activities. The property is locally known as “Parkburn” and is herein referred to as “Parkburn land”.
6. The Submitter supports:

- (a) The Low Density Residential and Medium Density Residential provisions, zones and guidelines; and
- (b) The inclusion of the FGO areas;

but considers the FGO mapping or a mix of Low and Medium Density Residential Zoning should apply to the Parkburn land.

No trade competition

- 7. The Submitter could not gain an advantage in trade competition through this submission.

Submission / Reasons for submission

Part 2

- 8. It is appropriate to have regard to Part 2, given the context.
- 9. In particular:
 - (a) Section 5, and its elements that promote the use and development of natural and physical resources which enables people and communities to provide for their social, economic, and cultural well-being.
 - (b) Section 6(b), which requires that all persons exercising functions and powers under the RMA to recognise and provide for the protection of outstanding natural features and landscapes from inappropriate subdivision, use, and development. In that regard, the Plan Change could more effectively identify 'brownfield' sites for future urban land use and development and thereby protecting other areas of outstanding natural features and landscapes from inappropriate subdivision, use and development, whilst providing for the long-term growth of the District.
 - (c) Section 7(b) which requires that all persons exercising functions and powers under the RMA to have particular regard to the efficient use and development of natural and physical resources. It is inefficient to not identify 'brownfield' sites within Cromwell area for future growth development.

Section 32 and Cromwell Spatial Plan - Future Growth Overlay area

- 10. Plan Change 19 applies to all existing Residential Resource Areas, including those outside areas covered in the spatial plans. At paragraph 38 of the s32 report, it notes that the Cromwell Spatial Plan provides a coordinated approach to growth management for Cromwell over the next 30 years, and reflects the community's preferred option for providing for the anticipated growth within Cromwell and includes several residential zones at different densities, increased housing options and amenity through more intensified development within walkable distance from the town centre, design guidelines for residential development and provisions to support greenway retention and development.
- 11. Key issues that the Plan Change sought to address include the increased demand for new residential development in the District due to population growth, and the lack of variety in housing options, particularly for smaller housing types, which has a direct correlation with housing affordability issues.

12. At 59, the section 32 assessment acknowledges that there is a lack of vacant land to accommodate the predicted residential growth under the current District Plan. The identification of additional 'brownfield' sites suitable for future urban development should be identified within the FGO or by residential zoning, to futureproof additional areas for medium to long term growth.
13. The Cromwell Spatial Plan Geographical Scope includes the Pisa Moorings settlement, however not the extent of the Parkburn area. This may be due to the existing quarry operations in which Council did not consider the area for future growth at the time the Cromwell Spatial Plan was developed in 2019. The Parkburn area is located contiguously with the existing Pisa Moorings settlement and thereby a plausible location for consolidated urban growth which enables higher density objectives consistent with the PC19 provisions, and consistent with Objective 2 of the Cromwell Spatial Plan. The Parkburn area can be serviced and has good transportation linkages with the State Highway.
14. The identification of Parkburn as a FGO area or mix of residential zoning will enable an appropriate re-use of the industrial quarry to a revitalised brownfield urban development, subsequent to the ceding and rehabilitation of quarry operations. This recognition as a FGO area or mix of residential zoning, can also assist in alleviating the shortfall of urban zoned land within the Cromwell Ward, and assist the housing affordability issue by providing additional housing supply of varied typologies, consistent with PC19 provisions.
15. It is therefore submitted that the Parkburn area be considered and included within the FGO area or by a mix residential zoning on the GIS web mapping application.
16. It is also submitted that reference to the Parkburn area, as a FGO area or residential zone, should be included within the introduction of the Low-Density Residential Zone. If specific areas are to be listed in the introduction of the Medium Density Residential Zone chapter, it is submitted that the Parkburn area be included within such introduction.

Relief sought

17. The Submitter requests the following decision:
 - (a) Amend, vary or otherwise modify the PC19 provisions and the mapping of the FGOs to include the Parkburn land; and/or
 - (b) Amend, vary or otherwise modify the PC19 provisions and the mapping of the Low and Medium Density Residential Zones to include the Parkburn land; and
 - (c) Any consequential amendments to achieve (a) or (b) above.
18. Granting the primary relief sought will:
 - (a) achieve the sustainable management purpose of the RMA and otherwise meet the requirements of Part 2;
 - (b) enable the social, economic and cultural well-being of the community;
 - (c) meet the reasonably foreseeable needs of future generations;

- (d) represent the most appropriate means of exercising CODC's functions, having regard to the efficiency and effectiveness of the provisions relative to other means.

Wish to be heard

19. The Submitter wishes to be heard in support of its submission.
20. If others make similar submissions, the Submitter will consider presenting a joint case at any hearing.

DATED 2 September 2022

Carey Vivian

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