

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
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Details of submitter

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

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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

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

(Give details, attach on separate page if necessary)

Rule LRZ-S1.1: The increase in minimum "Lot" size in the new "Low Density Residential zone" compared to the existing "Residential Resource Area" from 250m² per lot to 500m² per lot.

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.*

Submission Overview:

- The proposed change increases (doubles) the minimum lot size for a new residential dwelling that is located within the current “residential resource area” and the proposed “low density residential zone”.
- The affected area covers the majority of pre 2000 built residential zoned land in the district.
- Fundamentally the proposal is counter to the general direction that central Government has encouraged/directed through the National Policy Statement on Urban Development and other legislative changes (which currently only affect the major urban centres - but with Central Government scope to broaden through Orders in Council).
- This change is highly likely to impact negatively on housing affordability, housing choice and therefore overall well being of the local community over the longer term.
- The status quo (greater density) which has been in place for many years (decades) has not led to any significant negative impacts on either the environment or community well being.

Impact of this reduced density change:

Under the existing rule potentially a standard 600m² town section could be subdivided or two units built (with the potential to subdivide). This allows two lots at 250m² or above plus some land used as shared driveway access. Under the proposed rules, only a standard section above 1120m² (two 500m² lots plus 120m² driveway, or a corner 1000m² site could be subdivided. In the affected areas the vast majority of existing house sites are smaller than 1120m² (most towns are subdivided on a 1012m² quarter acre (40 perch) pattern (generally pre WWII) or a 809m² (32 perch - generally 1940s-1960s) or 607m² (24 perch - generally 1960s and later). Consequentially the vast majority of sites could no longer be subdivided or redeveloped.

Consequences:

The current rule allows flexibility and better use of resources.

- *For example a small house (say under 90m²) on a larger section (say 800m²) could be subdivided to allow an affordable small house on a smaller section plus a vacant infill townhouse on a 300m² section. This is a win-win for the community. Not allowing subdivision means that the small house in this example would probably be redeveloped to create one large far more expensive home.*

Another example of the flexibility that the 250m² minimum has is:

- *Consider a house is located in the middle of (say) a 1012m² section on a corner, a small section (say 300m²) could be subdivided off the back leaving the original house still on a good sized section (712m²) - again leaving an affordable home for the community plus creating an infill section. The alternative under*

the new rules is to demolish the house to create two vacant 500m2 sections - a loss of an affordable home for the community and a more affordable infill section.

The undeniable long term consequence of this rule is more expensive housing in the district. This will be due:

- Older homes (say 100m2 houses on 800-1000m2 sections) being demolished and replaced with larger new homes because no other development/subdivision option exists.
- Older homes being extended and enlarged because no other development/subdivision options exist.
- Restricted supply of new smaller sections for smaller new homes.
- Restricted new supply of smaller older homes on smaller sections.

Why this proposed change should not happen:

- The towns in Central Otago are all small so trying to restrict medium density to the town centres is not particularly useful - adding an extra 1 or 2 minutes to a commute is not detrimental.
- A large number of homes in the district are second homes. Many people want smaller homes on smaller sections for holiday home purposes - including in most of the more remote towns such as Omakau, Bannockburn etc.
- There has been very limited use of this rule over the past decades of it being in place - there have been no noticeable adverse effects from having this very flexible density rule. Retaining the rule is therefore unlikely to adversely affect the environment. Instead removing it is likely to cause far greater negative impacts on housing stock and affordability.

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

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

I would like to see the 250m2 minimum section size retained.

Although as a compromise, I would be satisfied if a rule was introduced, allowing the 250m2 minimum but requiring a maximum density of no greater than 30 households per hectare (1 lot per 333m2).

- **I oppose the application**
- **I wish to be heard in support of this 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.



Signature

2/9/22

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.*