

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: [Rayya Ali on behalf of New Zealand Motor Caravan Association.](#)

Postal address: [P O Box 72147, Papakura 2244](#)

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

Phone: [09 298 4566 ext 709](#)

Email: rayya@nzmca.org.nz

Contact person: [Rayya Ali](#)

(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)*

We are directly affected by an effect of the subject matter of the submission that:

(a) adversely affects the environment; and

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

(Give details, attach on separate page if necessary)

[The New Zealand Motor Caravan Association \(NZMCA\)](#) have made a submission relating to Plan Change 19 and the need for further assessments relating to reverse sensitivity effects of this plan change on existing land use activities (see submission attachment)

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.*

The NZMCA supports the need to provide for future residential growth and demand for housing. However, plan change 19 does not cover all the aspects the change which also includes reverse sensitivity effects. See attached document for more information.

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


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

The Association submits that as part of the plan change process, it is imperative CODC understands and explicitly recognises the potential reverse sensitivity effects on existing land use activities when incorporating the Government's Medium Density Residential Standards into the plan change.

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



Signature

06/09/2022

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.*



06 September 2022

Central Otago District Council

1 Dunorling Street

PO Box 122

Alexandra 9340

Emailed to: DistrictPlan@codc.govt.nz

Submission on Plan Change 19 – Residential Zone of Central Otago District Plan

Introduction

- 1 The New Zealand Motor Caravan Association Inc. (NZMCA) welcomes the opportunity to submit on the proposal to increase the density of residential housing within the Central Otago District as part of Plan Change 19 (PC 19).
- 2 The NZMCA is a non-profit organisation which represents the interest of New Zealanders who enjoy exploring the country at leisure in their motorhomes and caravans. The Association has in excess of 112,000 members with over 54 members only NZMCA motor caravan Parks nationwide. Three of these parks are located within the Central Otago District.
- 3 One of NZMCA's purposes includes public advocacy for the interests of camping and domestic tourism in Aotearoa New Zealand. This purpose has motivated its interest to make a submission on PC 19 of the Central Otago District Plan.
- 4 The NZMCA understands the need to provide for future residential growth and demand for housing and is supportive of these changes. However, PC 19 does not provide any assessments or investigations relating to reverse sensitivity effects or implications of PC 19 on existing land use activities particularly campgrounds located in non-residential zones adjacent to the residential areas.
- 5 The NZMCA **recommends**
 - Further assessments are undertaken to address reverse sensitivity effects and other implications of Plan Change 19 on existing land use activities, such as campgrounds like NZMCA Parks; and
 - Rules, policies and objectives are included in the plan change to mitigate reserve sensitivity effects.

NZMCA Parks in Central Otago District

- 6 The NZMCA have land-use consent to operate 3 motor caravan parks within the Central Otago District which includes:

Driving towards a Sustainable Future

The Ranfurly Park

6.1 The Ranfurly Park located at 12 Pery Street in Ranfurly. This park is in the Business Zone of the CODP with Residential Resource Area located to the east and southeast of the site (see Figure 1 below).

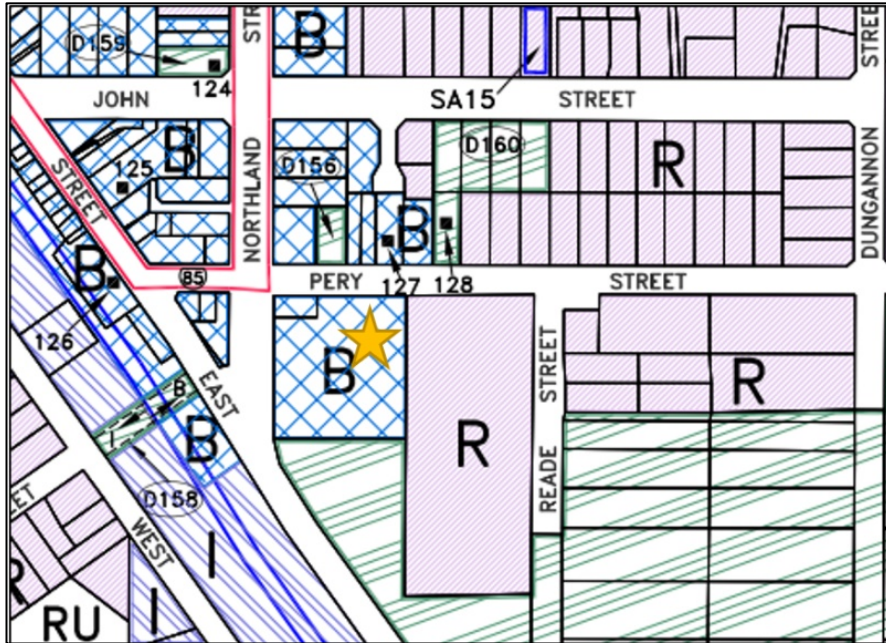


Figure 1: shows the location of NZMCA Ranfurly Park at 12 Pery Street in the Business Zone annotated with a star.

6.2 Residential Resource Areas will change to Low Density Residential zones as part of PC 19.

Rotary Glen NZMCA Park

6.3 The Rotary Glen NZMCA Park is sited in the Rural Resource Area with Residential Resource Area 3 located to the north and Residential Resource Area 6 covering land parcels to the west and south of the park.

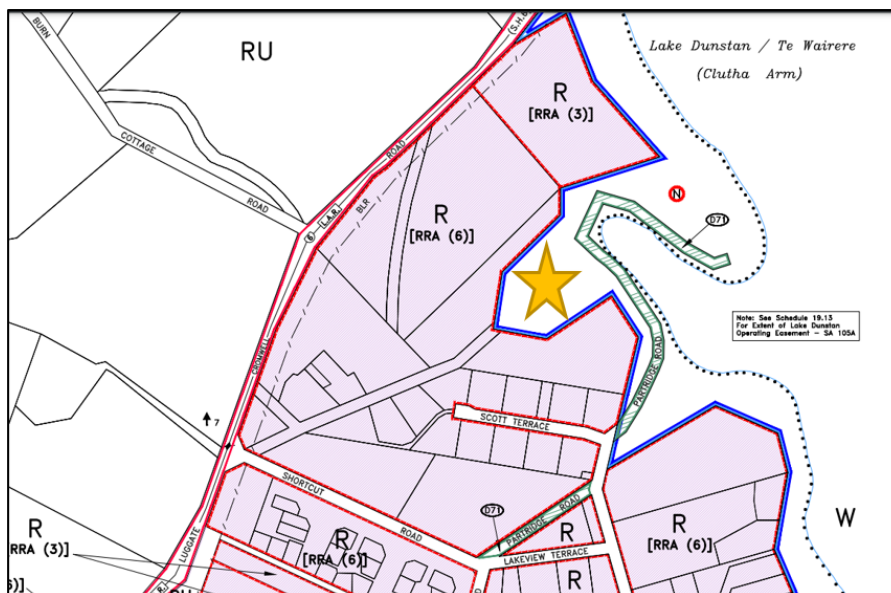


Figure 2: shows the location of NZMCA Park annotated with star.

Lowburn NZMCA Park

6.4 The Lowburn NZMCA Park located at 630 Luggate Cromwell Road within the Rural Resource Area of the District Plan. To the north are sites within the Residential Resource area 3 which will be converted to Low Density Residential – Precinct 3.

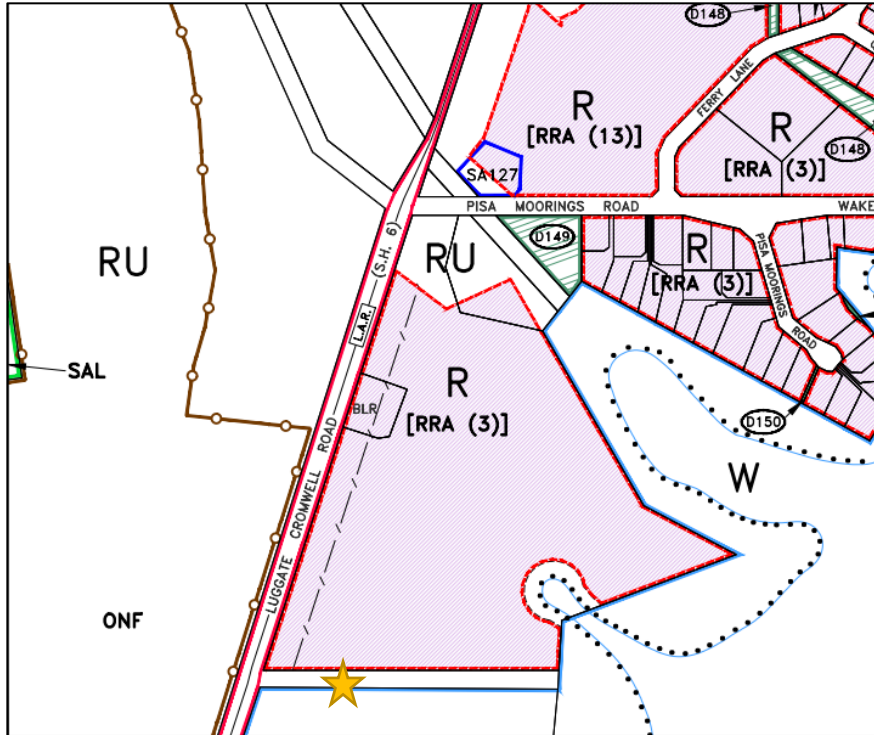


Figure 3: NZMCA park annotated with yellow star in the Rural Resource Area.

Reverse Sensitivity

- 7 Reverse sensitivity is when occupants of an activity complain about the effects of an existing lawfully established activity. This can have the effect of imposing economic burdens or operational limitations on the existing activity, thereby reducing their viability¹.
- 8 The potential reverse sensitivity effects to occur due to increased housing density as proposed by PC 19 could be affected by an increase in population in existing residential zones, giving rise to an increased cumulative community expectation on neighbouring land use activities.
- 9 For the NZMCA, there is potential for reverse sensitivity effects associated with visual amenity, noise and vehicle movements on new residential developments located adjacent to or nearby our parks. It could also result in constraints on future development of the NZMCA Parks.
- 10 The documents available on the CODC website relating to PC 19 is only concerned with the changing provisions within the CODP related to residential provisions and does not acknowledge the implications of these changes on existing activities located in non-residential zones such as the Business, Industrial and Rural Zones to name a few. No assessment or specialist reports have been provided by CODC to understand the implications of PC 19 on lawfully established and permitted land use activities, including campgrounds and NZMCA Parks, in non-residential and residential zones.

¹ Quality Planning website - <https://www.qualityplanning.org.nz/node/715> accessed 06 September 2022

Conclusion

- 11 The Association submits that as part of the plan change process, it is imperative CODC understands and explicitly recognises the potential reverse sensitivity effects on existing land use activities when incorporating the Government's Medium Density Residential Standards into the plan change.
- 12 We trust CODC will take our feedback and recommendations into consideration.

Nāku noa, nā
New Zealand Motor Caravan Association Inc.



Rayya Ali
Planning and Policy Advisor

Email: rayya@nzmca.org.nz
Phone: 09 298 5466 ext. 709
Postal: PO Box 72147, Papakura 2244