fresented of heavy 3 Try 2019 by David Mand

**Speaking Notes** 

**David Mead** 

Plan Change 13

Cover JWS – capacity and planning. Highlight areas not agreed

Briefly address additional evidence circulated by Requestor.

## JWS: Capacity.

Understand there is agreement that current zonings provide capacity for short to medium term growth expectations.

Ms Hampson's evidence – page 7, demand =972 dwellings, capacity (with no redevelopment) =1,186. This capacity exists, it is not 'optional'. It is part of the environment.

Long term is area of disagreement. Consider it reasonable to take into account possible redevelopment and plan changes in considering long term capacity. This is because:

- 30 year time frame -up to three plan reviews things will change
- Cromwell Spatial Plan document indicates that Council will take a number of actions to add capacity in existing urbanised area
- Spatial plan is a relevant document. It is not an RMA plan, but should have some weight in consideration of capacity options.

Having said that, agree that extra capacity in short to medium term can be beneficial. But benefits and costs of PC 13 need to be considered in the context of the other capacity options. PC 13 not the only option to provide capacity.

Note: JWS did not discuss demand estimates. My evidence raised some questions over demand projections. I agree that projections are needed and that this requires assumptions to be made. The point is that both the demand and supply sides of the equation are not fixed 'sums'. Both will vary over time.

## **Planning JWS**

NPS-UDC applicability.

My view is that Cromwell is not an urban environment as defined by the NPS-UDC.

Definition of urban environment has two components:

- Concentrated area
- Intended to reach 10,000 people

My interpretation of concentrated would be 'connected, compact, brought together'. In the context of Cromwell I consider it a stretch to 'rope' in Bannockburn, Pisa Morrings etc to get to the 10,000 figure.

As for 10,000, note that the Cromwell Spatial Plan suggests Cromwell may get to 10,000 people at some stage. However not too sure if it is 'intended' that Cromwell get to this number, versus Cromwell may get to 10,000.

If NPS did apply (or general content at least considered relevant):

Panel would have noted that PA 1 refers to sufficient zoned land for short to medium term (ie up to 10 years out). This has been established by the Spatial Plan analysis.

For longer term, 10 to 30 years, NPS only requires that land be identified. Spatial Plan has done this. Land does not need to be zoned.

Agree that NPS refers to 'feasible' development capacity and that there are question marks about feasibility of redevelopment versus greenfields development. My experience is that for the longer term (10 to 30 years) all councils are struggling with how to identify what development is 'feasible' given range of inputs about land prices, construction costs, housing preferences etc.

In the short term capacity is provided by vacant land and easier infill, which are likely to be feasible.

Agree that PA3 requires a focus on competitive land markets and that a range of development options will assist. It does refer to housing and business, and so if the NPS is to apply then also need to address business land needs.

PA 4 requires consideration of the effects of urban development on people and communities. So benefits from competitive markets need to be weighed up alongside adverse effects.

The NPS-UDC does not open all doors to all development.

#### **Additional Evidence**

Wish to briefly discuss two matters that are covered in my evidence:

- Residential amenity to be created
- Integrated urban development.

### **Residential amenity**

Effect of adjacent activities (motorsport park, speedway, orchards) on residential environment to be created is a significant issue and one that is not mitigated.

ORPS policy 4.5.3 refers to resilient, safe and healthy communities, sense of cohesion and recognition of community values.

Also mentions diversity of housing.

Central Otago District Plan also relevant:

Section 32 (3) of RMA. If the proposal amends a plan that already exists the examination under subsection 32 (1)(b) must relate to—

- (a) the provisions and objectives of the amending proposal; and
- (b) the objectives of the existing proposal to the extent that those objectives—
- (i) are relevant to the objectives of the amending proposal.

References in Central Otago Plan to protecting residential amenity (objective 7.1.2), reasonable noise etc (policy 7.2.1).

One of the important purposes of urban planning and Resource Management is to create liveable residential environments and residential neighbourhoods. Many social and community benefits flow from stable residential neighbourhoods where people build up social capital.

In a suburban, small settlement environment like Cromwell, outdoor amenity is an important aspect of overall residential amenity. So too is housing diversity.

In a big city environment, as covered by Jeff Brown, some people may be happy to trade off a noisy environment for proximity to cafes, bars, waterfront areas etc. They are effectively swapping one bundle of amenities for another.

In the case of PC 13, what is proposed is a loss of a core aspect of amenity, not a trade off.

Even if the trade off was appropriate, in the big city context, the numbers are relatively small — Auckland CBD may have 50,000 people living in the area, but this is out of a population of 1.5m.

In Cromwell, talking about 900 dwellings out of a stock of 2,000??

A buyer beware trade off requires people to be able to move if they do not like the environment that they have brought into. For PC 13 measures to work, people and households need the option to buy elsewhere in the town if they do not like the environment that they have brought into. This means that PC 13 does not mean that other capacity can be set aside. It provides a choice, but still requires the other areas of the town to develop as per the Spatial Plan. However if these other areas do not develop, then potential for people to be 'locked into' an environment that they do not enjoy, want to live in.

The other trade off that may be implied by PC 13 (as amended) may be that lower residential amenity is compensated by affordable housing provision. I agree that affordable housing is an important issue. I further agree that plans should take steps like small section sizes, more dense development, tiny houses etc to help reduce barriers to affordable housing production. This is a reasonable trade off.

I do not consider trading off health and safety (eg high noise levels) is appropriate in return for affordability.

New rule 20.7.7 (xii) – understand the intent, but some issues to address:

- sale of lots and dwellings sale to who?
- affordability of \$600 house and lot?
- is the rule reasonable? Just because it is offered by the requestor does not mean it is reasonable. Could easily be overturned by a plan change.

# Integrated urban development

This relates to RPS policies relating to logical and co-ordinated development.

Proposed objective 20.4.3 needs to be considered within this context.

RPS Objective 4.5 and policy 4.5.1: Co-ordinated and integrated urban development.

Masterplan spatial plan is relevant in applying this objective and policy.

- 4.5.1 (a) refers to a Future Development Strategy. Masterplan spatial plan is not a Future Development Strategy, but is similar in intent.
- 4.5.1 (b) refers to residential and business needs.
- 4.5.1 (e) efficient and effective infrastructure Mr Copeland raised the issue of development on two fronts and ability for council to keep up. Spatial plan signals priority near town centre.
- 4,5,1 Reverse sensitivity and providing for rural production.