

RESOURCE MANAGEMENT ACT 1991

FORM 6

FURTHER SUBMISSION IN SUPPORT OF, OR IN OPPOSITION TO, SUBMISSION ON PUBLICLY NOTIFIED PROPOSED PLAN CHANGE TO CENTRAL OTAGO DISTRICT PLAN

Clause 8 of Schedule 1, Resource Management Act 1991



To: Central Otago District Council
PO Box 122
ALEXANDRA 9340

Name of person making further submission: Julene Hudson (Full name)

This is a further submission in support of (or in opposition to) a submission on proposed Plan Change 13 to the Central Otago District Plan.

I am:

1. A person representing a relevant aspect of the public interest, the grounds for saying this being:

As attached; or,

2. A person who has an interest in the proposal that is greater than the interest the general public has, the grounds for saying this being:

As attached; or,

(Please state whether you are a person who may make a submission under 1 and/or 2 above and also specify/explain the grounds for saying that you come within category 1 and/or 2)

3. The local authority for the relevant area.

I support (or oppose) the submission of:

As attached on Plan Change 13.

(Please state the name and address of original submitter and submission number and submission point number of original submission)

The particular parts of the submission I support (or oppose) are:

As Attached

(Please clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal and continue on an additional page if necessary)

The reasons for my support (or opposition) are:

As Attached

(Please give reasons and continue on an additional page if necessary)

ENTERED 29/10/18

I seek that the whole or part [describe part], of the submission be allowed (or disallowed):

as attached

(Please give precise details)

I wish/(or do not wish) to be heard in support of my further submission.

(Please strike out as applicable)

If others make a similar submission, I will consider presenting a joint case with them at a hearing.

(Please delete if you would not consider presenting a joint case)

*[Handwritten Signature]*

28/10/18

Signature of person making Further Submission  
(or person authorised to sign on behalf of person making further submission)  
(A signature is not required if you make your submission by electronic means)

Date

Electronic address for service of person making further submission:  
(Please write clearly)

~~julene@agree~~  
julene-maree@  
hotmail.com

Telephone No: 027 4557391

Postal Address: 13 Summer Cove

Cromwell

Contact Person: N/A  
(name & designation, if applicable)

**FURTHER SUBMISSIONS IN SUPPORT OF, OR IN OPPOSITION TO, ANY SUBMISSION ON PROPOSED PLAN CHANGE 13 CLOSE ON MONDAY 29 OCTOBER 2018**

**Note to person making Further submission**

A copy of your further submission must be served on the original submitter within 5 working days after it is served on the local authority.

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.

**Further Submission in Opposition to Proposed Plan Change 13  
Addendum to Form 6**

25 October 2018

To: Central Otago District Council, PO Box 122, Alexandra ([Info@codc.govt.nz](mailto:Info@codc.govt.nz))

Name of Person Making Further Submission: Julene Ludlow

I am making this submission as either or both a person representing a relevant aspect of the public interest and as a person who has an interest in the proposal that is greater than the interest the general public has; the grounds for saying this being I live and own property in Cromwell and will be affected if PPC13 is approved.

The local authority for the relevant area is Central Otago District Council, and also includes the Otago Regional Council.

**I support the submissions of all those original submitters (400+) who indicated that they were in opposition to PPC13, including all the points enumerated on the summary of submissions provided by CODC. (Submissions 1 to 352 - Points 1/1 to 352/6, and Submissions 354 to 417 - Points 354/1 to 417/1 )**

**I do not support the single submission that was in support of PPC13.**

The particular parts of the submissions that were in opposition to PPC13, and that I support are in relation to the environmental effects on myself and others. These include, but are not limited to the loss of Cromwell's rural character because of high density, inappropriate urban development that may affect my land value, and the enjoyment of my local area. PPC13 is the wrong type of subdivision in the wrong location. The environmental effects that either directly or indirectly affect me are set out below:

**Noise -**

Many submitters raised concerns about noise and how ineffective proposed covenants would be in alleviating this issue for residents. There is already the noise from legally allowed and consented activities surrounding the proposed development, such as frost fighting helicopters, bird scaring devices, orchard spraying machinery, road traffic, air traffic from the nearby airport and car and go kart racing at the Central Speedway and Highlands Motorsport Park.

I will be personally affected if my rates have to increase to cover the processing of noise complaints from all the above activities, from visitors, workers and residents of the proposed development. The possible loss or closure of the orchards and motor racing facilities would affect my enjoyment of being able to buy fresh fruit straight from the orchard, and attend events at both motorsport facilities.

**Infrastructure (Water, Sewage, Stormwater):**

I am very concerned about, and oppose the extra burden that will be placed on myself as well as other ratepayers providing infrastructure to the proposed development.

**Water -**

The proposal stated that the existing water pipes do not have the capacity to supply potable water to the proposal. An upgrade to the town reticulated supply could cost upwards of \$3,500,000 (Pg 310). If it falls to Council, then that is going to affect me as a ratepayer. An imposed one-off development levy could fall well short of the necessary funding needed.

There was no assessment in the application, of the effects on the Cromwell aquifer from the use of irrigation bores throughout the proposed development, therefore this aspect may have an effect on me.

**Sewage -**

As the existing wastewater pipe doesn't have enough capacity if this proposal goes ahead, then who will pay to upgrade the wastewater connection from the land to Bannockburn Road and the two wastewater pump stations that will be required (pg 270). Again, an imposed one-off development levy could fall well short of the necessary funding needed and it will fall back to ratepayers to fund this infrastructure.

The proposal is silent as to whether the current wastewater treatment ponds have the capacity to process the expected sewage from the proposed development. If the treatment ponds need upgraded again that is going to affect me as a ratepayer as new discharge consents will be needed from ORC and there will be no allowance in the Long Term Plan for funding for this. Cromwell ratepayers do not want another debacle regarding lack of long term planning and funding that occurred in the past with renewing ORC discharge consents and expanding the wastewater ponds.

**Stormwater -**

Proposed soak pits for each residence and business are not and should not be the "usual method for development in Cromwell". The Paterson Pitts report states that there is no reticulated stormwater system in the Cromwell area. (pg 267 of application). This is untrue as I live in Cromwell and my household stormwater is collected into pipes that flow into a network administered by the CODC. I'm sure this reticulated system, paid for by ratepayers is not just for my sole benefit. What else in this report is false?

Reticulation of stormwater should be the norm now, especially given the sheer size of the proposal and we should all be doing our best to protect the receiving environment from any possible contaminants from property and road run-off. The receiving environment includes considering any adverse effects on other water users which has not been considered in the application. I value and use the lake regularly by fishing and swimming in this water, and do not want the water quality of Lake Dunstan adversely affected by large volumes of stormwater entering the lake via the underground aquifers.

**Visual -**

I regularly drive past the proposed area and have enjoyed the open vistas to Bannockburn. This area is currently zoned for 2 ha lifestyle blocks and would look absolutely awful if it was crowded with tiny sections with 2 story houses sitting side by side. It is an entirely inappropriate use of the land and should not be rezoned to high density housing. It would be depressing to have to view rows and rows of high density block housing.

**Traffic -**

As a regular user of the state highway, I will be affected by the proposed increase in volume of traffic that will be using the highway intersection with Sandflat Road. If there are events on at

Highlands, there is always some form of temporary traffic management at the intersection, but there would be serious effects on emergency services, tourist's cars, campervans and buses and Cromwell residents because of the daily increase at this intersection, especially as it is on a 100 kph stretch of highway.

I am also concerned for the inability in an emergency to manouvre ambulances and large fire engines around the very narrow streets which will be crowded with parked cars, boats, trailers and caravans in the proposed development, especially as there is only a proposed provision for 1 off street car park per property.

#### **Air -**

The proposal states, in one line, that it will meet ORC's Air Plan. It does not state at all how it will meet the requirements, and that is concerning as currently the proposed development will be located in Air Zone 3, separated by approximately 250 metres from the boundary with Air Zone 1. Air Zone 1 covers all of Cromwell, from near Aurum Vineyards going south to Cemetery Road, including Ripponburn Home area, then east to Lake Dunstan, including the sewage treatment plant but excluding the chaffer beetle reserve, then north to Deadman's Bridge, then follows the shoreline back to near Aurum Vineyards.

See [www.orc.govt.nz/media/1456/air-zone-1-cromwell.pdf](http://www.orc.govt.nz/media/1456/air-zone-1-cromwell.pdf) for the actual map.

As the proposed development is located in Air Zone 3 it would allow home owners to install woodburners with a particulate emission rate of less than 1.5 g/kg and a thermal efficiency of not less than 65%, whereas if the property was in Air Zone 1 the particulate emission rate would have to be much lower - 0.7 g/ kg or less. If the proposed 800+ houses all install woodburners then this would have an horrific effect on the health and well being of all the residents in Cromwell, including myself, with the increased smoke and ash that would hang over Cromwell, especially on the calm days of winter.

There are also different rules for outdoor burning between Air Zone 1 and Air Zone 3.

Rule 16.3.2.1 of the Air Plan states:

Discharges from outdoor burning on residential properties in Air Zone 1 or 2 - are a permitted activity

Except as provided for by Rule 16.3.2.5,(cooking of food) the discharge of contaminants into air from outdoor burning on any residential property in Air Zone 1 or 2; is a permitted activity, providing:

- (1) Only paper, cardboard, vegetative matter or untreated wood is burnt; and
- (2) The material is from the property where the burning occurs; and
- (3) The material is dry at the time of burning; and
- (4) **The burning does not occur within 50 metres of the closest part of the boundary of the property; and**
- (5) Any discharge of smoke, odour or particulate matter is not offensive or objectionable at or beyond the boundary of the property.

Most residential properties in Air Zone 1 cannot meet the the 50 metres boundary restriction and therefore residents are prohibited from burning rubbish outdoors.

However, Rule 16.3.2.3 doesn't have a boundary restriction. It states that:

Discharges from outdoor burning on properties which are not production land, in Air Zone 3 - are a permitted activity.

Except as provided for by Rule 16.3.2.5,(cooking of food) the discharge of contaminants into air from outdoor burning on any property which is not production land, in Air Zone 3; is a permitted activity, providing:

- (a) Only paper, cardboard, vegetative matter or untreated wood is burnt; and
- (b) The material is from the property where the burning occurs; and
- (c) The material is dry at the time of burning; and
- (d) Any discharge of smoke, odour or particulate matter is not offensive or objectionable at or beyond the boundary of the property.

Therefore all the residents in the proposed development (which will be non-production land in Air Zone 3), are permitted to burn all their dry outdoor rubbish regardless of how far away the fire would be from their property boundary. This will have a detrimental effect not just on myself but all the surrounding residents of Cromwell. The ORC submission stated that on average Cromwell residents experience over 30 days during winter where pollution levels breach the national standard and that a major source of these particulates are emissions from solid fuel home heating appliances, but it did not mention the cumulative effects of backyard rubbish burning from the residential properties in the proposed development.

It would be prudent for Council/Environment Court, if the Plan Change is ultimately approved, to ensure that the Rules for this Plan Change impose conditions similar to those at Lake Hayes Estate; that there are no domestic or commercial fires at all, either inside or outdoors, and that heating is only from electricity, diesel or gas.

If this is not possible then CODC needs to get together with ORC to promote a change to Air Zone 1 to include the development area, thereby effectively banning outdoor burning, and restricting the particulate emission rate of woodburners.

#### **Scale of PPC13 -**

In the context of the Cromwell Basin, this development would be enormous, effectively adding a satellite town the size of Arrowtown. The approximately 40% population increase will have a significant cultural impact on my community, leading to increased use and possible overcrowding of Council facilities such as sportsfields, the library, the schools, kindy's, pre-schools and day care centres, etc. Being based in a paddock with no pedestrian or cycle or off-highway transport route to the retail and community hubs in Cromwell is entirely inappropriate. This is poor urban planning at its worst and does not represent the logical progression for the residential growth of Cromwell.

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The reasons for my support of the opposing submissions' particular parts, have been outlined with each particular part of my submission above.

I seek that the whole of this further submission and/or the 416 submissions in opposition that I support, be allowed.

I wish to be heard in support of my further submission. I request that Council give consideration to the Hearing being held in Cromwell, not Alexandra.

If others make a similar submission, I will consider presenting a joint case with them at a hearing.