RESOURCE MANAGEMENT ACT 1991

FORM 5

SUBMISSION ON NOTIFIED PROPOSED PLAN CHANGE TO CENTRAL OTAGO DISTRICT PLAN

Clause 6 of Schedule 1, Resource Management Act 1991

To: Central Otago District Council
PO Box 122
ALEXANDRA 9340

Name of Submitter: ALASTAIR + SUE STARK
(Full name)

This is a submission on proposed Plan Change 13 to the Central Otago District Plan (the proposal).

I ~~could~~/could not* gain an advantage in trade competition through this submission.
(* Select one)

I am/am not* directly affected by an effect of the subject matter of the submission that:
(a) adversely affects the environment; and
(b) does not relate to trade competition or the effects of trade competition.
(Delete entire paragraph if you could not gain an advantage in trade competition through this submission)
(* Select One)

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

The entire proposed plan change 13.

(Please give details and continue on additional page if necessary)

My submission is:

Please see attached document

(Please include:
- whether you support or oppose the specific provisions or wish to have them amended; and
- reasons for your views;

and continue on additional page if necessary)

I seek the following decision from the local authority:

That the entire request for proposed plan change 13 be declined.

(Please give precise details)

WE DO NOT WANT **~~I wish/do not wish~~ to be heard in support of my 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)

S. M. Stark OPStark

Signature of Submitter
(or person authorised to sign on behalf of submitter)
(A signature is not required if you make a submission by electronic means)

19/6/2018
Date

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(name & designation, if applicable)

SUBMISSIONS CLOSE IN RESPONSE TO PROPOSED PLAN CHANGE 13 ON WEDNESDAY 20 JUNE 2018

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.

Submission on Plan Change 13

I oppose the entire proposed plan change 13 for the following reasons:

1) The proposed Plan change 13 will undermine the master planning exercise that the Cromwell Community Board has embarked upon. To ensure that the effective and meaningful development of the master plan at the minimum the Plan change 13 should be rejected until the master planning is completed.

2) The proposed Plan change 13 will undermine the town and community planning that has already been completed in the past - its effect will be to undermine the result and consultation that has already occurred and thereby encapsulated in the CODC district plan

3) The proposed Plan change 13 will create parking difficulties within the subdivision as the subdivision proposal only allows for 1 car park per dwelling. Typically this would mean extra cars are parked either on the street or on Sandflat Road. This however will not be possible as the proposal also includes very narrow streets.

4) Proposed Plan change 13 cannot rely on public transport as there is no material public transport within Cromwell and as such this will drive people living there to require a car to commute to the infrastructure within Cromwell, adding to both car parking and roading congestion.

5) The additional commuters that the subdivision will bring will increase the road loading within Cromwell and between Cromwell and the other towns Cromwell serves. Commuters all heading to the gorge at the same time will clog the gorge and further degrade the amenity value of living in Cromwell.

6) There are currently no waling or cycling connections between the proposed sub-division and the community of Cromwell. If these routes additionally have to be created they will either be on the Main Highway or through the industrial area of Cromwell.

7) It appears that the wastewater ponds capacity have not been properly calculated only speculated upon in the proposal. This may very well lead to additional, unplanned for loading and compromising of the wastewater system. This is an unfair burden on the ratepayers of Cromwell and at the minimum needs additional work done to calculate this properly and attribute the proper and full cost of development contributions as a result of the additional loading.

8) The proposed Plan change 13 in effect will turn Cromwell into a commuter town serving the broader Central Otago District and Queenstown Lakes District. This will degrade the strong and supportive community that is integral to town and wider community of Cromwell. By having the sections separated from Cromwell to such an extent it will be difficult to properly integrate the people living in the proposed subdivision properly into the community, which further degrades the community values.

9) Cromwell as currently configured does not have the services or conveniences to cater for some additional (840x3) 2500 people in our town. As such the significant size of this development should either be rejected for this reason or the development contributions should be materially loaded to

account for the additional strain a development will have not only on underlying infrastructure but also on the supporting amenities (e.g., library, pool, sports fields etc).

10) The proposed Plan change 13 will have the effect of hemming in the industrial area so that it will be surrounded by residential areas, restricting additional expansion of this type of land and increasing reverse sensitivity issues for industrial uses.

11) The proposed Plan change 13 will forever remove what has the potential to be very valuable and productive orchard and vineyard land. Although the farm as currently constituted may not have been productive a land use change to orchards or vineyards would have significantly added to the productivity of the land and this has not been properly considered. Once the land is sub-divided the land will effectively be locked away from enhanced and regionally appropriate use as productive vineyard/orchard land.

12) The proposed Plan change 13 will increase reverse sensitivity issues to an unmanageable extent for neighbouring orchards. The right to farm on neighbouring vineyards will be compromised. Activities that are vital for the continued successful operation of productive assets that will be compromised by the sub-division include crop spraying, tractor movements that generate noise (mowing etc), frost fighting (either wind machines or helicopters).

13) The proposed Plan Change 13 location right next door to the speedway, which is a demonstrably valuable addition to both the recreational values of the community (and broader CODC and QLDC districts) and is a significant income generator for the town drawing in large crowds during the summer season it operates within, will cause additional reverse sensitivity issues. Experience shows that this can lead to assets such as the speedway being closed due to the continued pursuit through the RMA. The recent Western Springs experience is a clear demonstration of this.

14) The proposed Plan Change 13 location contiguous to the highly successful Highlands Motorsport park is another example of poorly conceived reverse sensitivity impacts. Zoning the land either for rural or industrial is a more appropriate use for the land, not high density residential. The proposed zone has included almost no controls to protect Highlands, the Speedway and other existing activities. As such the proposed plan ideally should be rejected or at a minimum include controls which will ameliorate the expected effects (noise, spray drift, operations at unusual hours etc). Precedent also shows that any motorsport facility that has residential built around it, suffers. Rules are changed and innovation and investment suffers – with ultimate decline and closures. There are other major areas more contiguous to the town centre and separated from current land uses which are more appropriate. These are major and material (Wooing Tree, Top 10 Campground to name just two) and are more appropriate for the Council to accept.

15) The proposed Plan change 13 is an example of what appears to be poor urban design - minimum lot sizes of 160 square metres (couple this with the requirement of 1 car park per house that is likely to be for a couple with 2 cars and possibly a tradie ute) is a highly inappropriate minimum lot size and is not in keeping with the current average lot area. It is likely to result in an "urban ghetto" feel to the subdivision and should be increased to a minimum of 500 square meters. Retaining the minimum lots size will be be worse than Shotover country, it is worth noting that 300 square meters is the smallest lot in Shotover country.

16) The proposed Plan change 13 appears to be taking the easy route to addressing density by dropping lot size rather than considering other alternatives. As such the proposal should be rejected. Additionally, no building plans for these future tiny lots are proposed so we don't know if they can work and as such we open ourselves to the spectre of a "trailer park"/urban ghetto feel to the sub-division.

17) The proposed Plan change 13 does not include within it any meaningful staged development progression. As such it has the potential to significantly overload the town infrastructure and associated amenities.