

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: Greg + Vivienne Wilkinson
(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:

- Impact on existing neighbouring operations and neighbours
- Housing density / minimum lot sizes
- Impact on existing infrastructure
- Traffic volumes and linkages to existing community
- Need for development not proven.
(Please give details and continue on additional page if necessary)

My submission is:

We oppose the proposed Plan Change 13 for reasons stated in the accompanying statement (attached).

(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:

Decline Plan Change 13 application.

(Please give precise details)

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)

GA Wilkinson *llllllllll*

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)

18.6.2018

Date

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Greg + Vivienne Wilkinson

(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.

## **Plan Change 13 Submission**

Whilst not opposed to sub-division or development per se, any proposed changes to our District Plan should be well-considered and appropriate for Cromwell's future needs.

We believe that the proposed Plan Change 13 does not prove itself to be either appropriate or timely. There is no current need for this development now or in the medium term future (over the next 10 years).

Developers, however well-intentioned, should not dictate planning policy. Rather this should come from a managed process as part of, or as a result of, a District Plan review or the current 'Eye to the Future' master planning process.

Nor should professional developers be able to use their supposed expertise and wealth to literally bulldoze their plans through normal consenting processes by simply starting their project and then applying for consents retrospectively. This smacks of arrogance, shows little respect for the Cromwell community and is a blatant display of contempt for following due process.

We object to this proposed Plan Change 13 based on the following concerns:

### **1. Impact of existing neighbouring operations and residents including;**

Highlands Motorsport Park (HMSP)  
Central Speedway (CS)  
Orchards  
Commercial operations along Sandflat Road  
Rural Residents

The imposition of a 'no complaints' covenant on titles, though legally binding on owners and occupiers, will not mean there are no complaints in practice. The HMSP, CS and neighbouring orchards by their very nature, generate noise and undertake activities that are not conducive to a residential neighbourhood.

Yes, residents can simply choose not to live within the RTRA area if they are noise sensitive or find orcharding practices such as bird-scarers, spraying and frost-fighting objectionable. However, with an estimated 2000 residents within the RTRA, assuming full occupancy once completed, there will over time, be some residents who see fit to complain about noise and rural practices.

Residential living and existing businesses operating under their consented activities are simply not compatible and the presence of the RTRA will threaten the viability of these existing operations in the future.

We understand that the Central Speedway has a new consent to operate until 2025. If the RTRA proceeds and is built in the meantime, it will signal the death knell for the renewal of the CS consent in 2025 as RTRA residents will object to its renewal.

## **2. Housing Density**

The creation of 900 sections within the 49ha area with section sizes for Residential Sub-Area A of between 160sqm and 500sqm, will create an unacceptable high-density residential area.

Even allowing for design and outlook provisions, sections down to 160sqm are the equivalent of 'residential battery farming' and will potentially create ghettos. This is approximately half the minimum lot size for Shotover Country sub division which has a minimum of 300sqm. There is simply no justification for minimum lot sizes of 160sqm.

## **3. Impact on Existing Infrastructure**

The addition of up to 900 residences in the RTRA will add strain on existing wastewater and reticulated water infrastructure, which the Request Document shows are inadequate to cope.

Sandflat Road is not sealed and will require upgrading to handle the additional traffic volumes.

Who will pay for these upgrades to existing roading and water services?

## **4. Traffic Volumes and Connectivity**

With a minimum space allowance of one vehicle per residential unit for the majority of the RTRA, there will be a massive increase in traffic volumes on roading around the RTRA, including SH6, Sandflat Road, Pearson Road, Bannockburn Road, Cemetery Road.

Traffic volumes on SH6 at certain times of the day are already bumper-to-bumper as workers commute through the gorge to Queenstown. If 900 houses have a conservative one vehicle each, more likely to be two vehicles, this will have a major impact on already congested roading at peak times.

Whilst it is encouraging to see the consideration given to greenways and pedestrian linkages within the RTRA development, what connectivity is there beyond the RTRA area for cycle and pedestrian access to the rest of the Cromwell community? For example, what safe passageway is there for children biking to school or residents walking to town across the aforementioned congested road network?

## **5. Need for Plan Change 13 is not proven**

There are several other sub division developments within and around Cromwell urban boundaries, and there is simply no current need for this Plan Change. Residential sub divisions at the Top 10 Holiday Park, Wooing Tree, Gair Estate and potential others at The Chalets and 'Sew Hoy land' at Waenga Drive, there is enough land within the existing urban boundaries to satisfy Cromwell's growing needs for the next 10 years.

Yes, we do need to consider the long term implications beyond 2028, however there is a Master Planning process currently underway which may determine what needs there are and where the most appropriate sites are for future development. This proposed plan change is putting the cart before the horse and there is no justification for it at this time.

Ends.

**Greg & Vivienne Wilkinson**  
**47 Erris Street, Cromwell**  
**June 18, 2018**