

Submission on Proposed Plan Change 13

20 June 2018

To: Central Otago District Council, PO Box 122, Alexandra

Name of Submitter: Julene Ludlow. 13 Sunhaven Cove, Cromwell,

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



Affordability:

The applicant states that the plan change will "contribute to fulfilling the demand for more - and more affordable - housing stock in the short to medium term". (page 5 of their Overview). How will the applicant make provision for affordable housing? Is there a definition of affordable buried deep in the application? There is no CODC requirement for developers to provide a percentage of 'affordable' stock and there is no exact formula for the provision of such housing. Should the developers or the Council be looking at this as part of a plan change? Surely if the developers make such claims they should back them up in their application, but it is silent.

Size and scale:

I am concerned that the outskirts of Cromwell is losing its rural character because of urban development. Predominately Residential A is the largest area which will also have the highest intensification of housing. Creating a mini town in this area will be an eyesore, especially with the requests for the heights and site coverages for the proposed sections and buildings in Sub-Area A and B. There is only a 1 metre setback from property boundaries, a maximum height of 9 metres and a 45% site coverage. In the Neighbourhood Centre there is a maximum height of 12 metres meaning a 4 storey building can be built there. The Education Overlay has a height of 15 metres meaning a 5 storey school can be built. These maximum height restrictions are all too high, normal residential heights in urban residential areas in the CODC boundary are only 7.5 m, and these ones should be no different.

Travellers accommodation is a restricted discretionary activity in residential Sub areas A & B meaning a large block of units with a maximum height of 9 metres can be built right beside a residential house without an application being publicly or limited notified, even to the next door neighbours. Buyer beware. I would like Council to amend the Proposed Plan change to make it mandatory to get the approval of adjacent neighbours specifically for travellers accommodation applications.

Light Spill:

I could find no mention of any controls or restrictions on the proposed type of street lights. Light spill and glare have implications for road safety and visual amenity. Council must require street lighting to be shielded so they emit no light horizontally or upwards, but only down to the ground where the light is needed. Such lights are called full cut-off luminaires and are used in Tekapo, enhancing views of the night sky.

Vehicle Access onto State Highway 6 and Sandflat Road:

I couldn't find any traffic movement analysis in the Request document or anything from NZTA about the effects of increased traffic at the intersection. There are 6 vehicle access roads proposed for entrance and exit from Sandflat Road. Who will pay for Sandflat Road to be upgraded and tar-sealed, due to the increased traffic flows. Is it not prudent, given the volume of traffic that use the State Highway, to insist on a roundabout for the intersection of Sandflat Road with State Highway 6, not de-acceleration lanes.

Also, is there any provision for a formed cycle way from the development into Cromwell?

Restrictive Covenants:

I support the proposed restrictive no-complaint covenant with regards to the Central Speedway, Jones Orchard and Highlands Cromwell Motorsport Trust Limited, but query just how effective they will be? A covenant can be lifted from a title on application to a District Court. Those with deep pockets can do this, then complain ad nauseum about noise and traffic until finally CODC would have no choice but to impose very restrictive conditions on their consents/lease or close down these iconic businesses. The Speedway and Highlands can generate noise that can be heard in Cromwell depending on wind direction but they are integral to attracting visitors to town, and are not daily occurrences. We only need to see what has happened at Western Springs Stadium in Auckland where a group of local residents angry

about the noise from the stadium won an Environment Court case last year and the speedway was forced to comply with an 85-decibel noise limit.

Water:

An unknown number of bores are proposed to supply irrigation to the greenways, who will be responsible for the operation and maintenance of these bores, and of meeting conditions of an ORC water permit to drill the bores and extract the water?). (Pg 266 of application).

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). Who is going to pay for that? If it falls to Council, then that is going to affect me as a ratepayer.

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 is not just for my sole benefit. Reticulation of stormwater should be the norm now, especially as 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. Will stormwater run-off affect the quality of the bore water that the Alpine Water Bottling Plant extracts and bottles, located immediately adjacent to the proposal in Sandflat Road?

Wastewater:

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).

It is not stated if 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.

Air:

This has not been mentioned at all in the proposal, apart from a small one-liner stating that the proposal will meet ORC's Air Plan. Re air quality in Cromwell, which already regularly breaches NES standards, would it not be prudent for Council, if the Plan Change is approved, to insist the same conditions as at Lake Hayes Estate; that there are no domestic or commercial fires at all, and that heating is only from electricity, diesel or gas?

I am neutral regarding the application and wish for Council to consider that matters I have raised when considering the request. I have found it difficult to find any positive environmental effects of the proposed Plan Change 13.

I do wish to be heard.

Julene Ludlow

0274219121