

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: K. Wally Sanford

(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:

20.5.1, 20.6.1, 20.7.1 (ii) (a) (b) (h) (j) - [pages 27-28] 2.7.2 (i) (c), 20.7.3 (iv) (a), 20.4.3

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

My submission is:

I oppose the subject land being re-zoned for intensive residential use. Land use priority should be in favour of horticulture, or if horticulture is deemed to be inappropriate due to lack of water, poor soils etc then industrial zoning should be favoured as that would integrate into the surroundings more seamlessly. See attached 3 pages.

(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 the proposed plan change in its entirety

(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)

Wally Sanford

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)

18/06/18

Date

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Wally Sanford.
(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.

20.4.3 Policy – Housing Affordability

Enable a range of dwelling types and sizes to help meet the housing needs of households on moderate incomes, while maintaining a high quality of urban and building design.

The intensive nature of this development and all the negative impacts and poor living quality associated with it, would need to have the single benefit of housing affordability which means people employed in the Cromwell basin can afford to buy into the lower end of the property market with four years of concerted savings, whether they are an apprentice, graduate, tradesperson or professional. If the intensive development does not result in property prices to meet that then my opinion is that this proposal falls at this first hurdle. If the efficiency of this design does not result in affordable housing then the layout and building density must be revised to something more traditional where permafrost is less likely and sun shines in peoples windows.

20.5.1 Creation of the River Terrace Resource Area

The planning maps identify the River Terrace Resource Area which has a Structure Plan (Rule 20.7.8), a Movement Plan (Rule 20.7.9), a Development Parcel Plan (Rule 20.7.10), Indicative Road Cross Section Plans (Rule 20.7.11), and rules (Rules 20.7.1 – 20.7.7) applicable only within this Resource Area. The River Terrace Resource Area is to be comprehensively developed for urban activities in accordance with the Structure Plan. Activities include medium and higher density residential, retirement living, neighbourhood centre, an associated open space network, walkways, roading and infrastructure, and potential educational facilities.

I oppose the subject land being re-zoned for residential use, whether it is this intensive proposal or a revised predominantly residential proposal. Land use priority should be in favour of horticulture, or if horticulture is deemed to be inappropriate due to lack of water, poor soils, bad climatic conditions etc then industrial zoning should be favoured as that would integrate into the surrounding environment and land uses far more appropriately.

20.6 PRINCIPAL REASONS FOR ADOPTING OBJECTIVES, POLICIES AND METHODS

20.6.1

The provisions provide for diversity of housing product to enable a range of price options, and a well-designed built environment comprising a range of residential living options...

The Resource Area provisions promote the development of a quality compact neighbourhood that:

- (b) Improves physical and mental well-being by providing safe walking and cycling connectivity, slow-speed safe roads, reduction of crime through passive road surveillance, and a variety of recreation opportunities;
- (c) Improves sustainability by encouraging walking and cycling for local trips, minimising impervious surfacing, maximising green spaces, and promoting effective solar orientation;

While the solar orientation of the Lots may be mostly correct, without demonstrated information that the sun can actually get into the dense dwelling layout then the orientation counts for nothing. Is this information available?

(d) Enables affordability by promoting compact infrastructure, and a range of lot sizes to create a choice of housing types.

It is inappropriate to refer to the proposed development as being well designed when buildings up to 9m high, at 45% coverage, with two metres of separation and providing one or no external carparks. Densely designed does not mean well designed.

Unless reliable projections of incomes within the Cromwell basin compared to reliably projected residential sales has been provided then any mention of housing affordability in the request document must be ignored. If the requestor is making claims of housing affordability then the onus is on the requestor to demonstrate the affordability at all levels, especially the entry level.

20.7.1 PERMITTED ACTIVITIES

(ii) Residential activities and buildings within Residential Sub-Areas A and B

Residential activities and buildings within Residential Sub-Areas A and B as shown on the River Terrace Resource Area Structure Plan, excluding buildings and activities within the Retirement Living Overlay for retirement living purposes, are permitted activities provided they meet the following standards:

(a) Building Height The maximum height of any building shall not exceed 9m.

It is noted that 9m is the approximate height of the terrace. Significant investigation into shading and the effect that has on different neighbouring properties at different times of the day would need to be provided and satisfied before an informed decision could be made to approve such a height.

(b) Height in relation to boundary

Buildings shall not project beyond a 45-degree recession plane measured from a point 4.5m vertically above ground level along rear and side boundaries.

Significant investigation into shading and the effect that has on different neighbouring properties at different times of the day would need to be provided and satisfied before an informed decision could be made to approve such a height recession plane. I would suggest that the recession plane is reactive to the proposed housing height and density, rather than proactively protecting the reasonable right to daylight for all properties within the development.

(h) Driveways Driveways shall be a minimum of 5m in length or a maximum of 1.5m in length (but not between 1.5 – 5m).

Internal or covered parking simply does not account for satisfying the carparking needs for a dwelling. The 5 metres that is referred to should be 6 metres to allow for vehicle boots opening, bike racks etc and 6m should be the minimum.

(j) Carparking

A minimum of 1 carpark space per dwelling shall be provided on site, provided that an additional carpark shall be provided in association with a home occupation.

One with an additional park should be two carparks minimum with an additional two for a home occupation.

20.7.2 CONTROLLED ACTIVITIES

(i) Subdivision

Subdivision for the following purposes shall be a controlled activity:

(c) Boundary adjustments.

The intent of this rule needs further clarification. Is it ok to subdivide two 240m² sections into a 160m² section and a 320m² section, which could then perhaps be subdivided into two 160m² sections resulting in a net infill of lots, or is the controlled activity providing for correcting a boundary onto established occupation say 200mm parallel to the boundary.

20.7.3 DISCRETIONARY (RESTRICTED) ACTIVITIES

(iv) Buildings within the Neighbourhood Centre Overlay

Buildings within the Neighbourhood Centre Overlay are a discretionary (restricted) activity provided that any building meets the following standards:

(a) Building Height The maximum height of any building shall not exceed 12m;

While intensive residential development significantly detracts from the expected land use of the area, any 12m high commercial building doubles the impact and given it's likely visual significance from the highway would negatively impact on the viability and vitality of the existing Cromwell mall, which has no vitality and seems barely viable in it's current state.

Additional Notes to submission:

Provisions, policies and claims made in the request for plan change 13 that have not been specifically addressed in this submission should not be taken as being supported by myself.

The request is of a scale and density completely inappropriate for the surrounding environment and land uses to the point where iterations would be inappropriate. Any further proposals for the land need to be a complete re-think of what Cromwell needs and how it should be delivered.



Wally Sanford

18.06.18