

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: Mt Difficulty Wines Ltd
(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:

As set out in the accompanying page
(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:

The entire request for plan change 13 is declined
(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)

**Matt  
Dicey**

Digitally signed by Matt Dicey  
DN: cn=Matt Dicey, o=Mt  
Difficulty Wines Ltd, ou=Winery,  
email=matt@mtdifficulty.co.nz,  
c=NZ  
Date: 2018.06.15 11:23:03  
+12'00'

.....  
**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)

.....  
15 June 2018

**Date**

**Electronic address for service of submitter:**

.....  
matt@mtdifficulty.nz

**Telephone No:** 029 566 4287

**Postal Address:**

.....  
PO Box 69, Cromwell, 9384  
.....  
.....

**Contact Person:**

.....  
Matt Dicey, General Manager

.....  
(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 Cromwell community has recently invested in and is undertaking an extensive master planning exercise. One of the elements of the master plan is to enable spatial planning within our region highlighting the best growth options for Cromwell as a town, thus to ensure effective and meaningful development of the master plan at the minimum the Proposed Plan change 13 should be rejected.
- 2) The ME report within the proposed plan change 13 document highlights that Cromwell has enough potential for sections for development through to the mid 2020's allowing enough time for both the 10-year district plan to be developed and the Cromwell master planning exercise to be completed. This illustrates that there is no time pressure to accelerate development by allowing for the creation of a special housing resource area as proposed by plan change 13. On this basis the proposed plan change 13 should be rejected
- 3) Previous town and community planning will be undermined, impact on services such as wastewater or other amenities such as playing fields, libraries etc do not seem to have been addressed, this will place a burden on existing rate payers. Due to the significance of an unplanned for additional 50% of our current population plan change 13 should be rejected. Or at a minimum additional work needs to be done to calculate what this loading to services actually would be and these costs need to be passed on through development contributions.
- 4) 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
- 5) The additional traffic that the subdivision will bring will increase the road loading between Cromwell and Bannockburn. This additional traffic on Sandflat Road will remove an option for commuters from Bannockburn to SH6. Additionally, commuters heading through the gorge to Queenstown at the same time will put further pressure on the gorge roading network and further degrade the amenity value of living in Cromwell.
- 6) Cromwell is already under pressure during peak periods for carparking and ability to access the town centre, without any form of public transport and the underlying assumption that proposed plan change 13 residents are all going to commute to Cromwell these access and parking pressures are going to grow exponentially. Materially impacting on community values
- 7) The proposed plan change 13 will forever remove what has the potential to be very valuable and productive orchard and / or vineyard land. Although the land as currently constituted may not be productive a land use change to either orchards or vineyards would have significantly added to the productivity of the land and this has not been properly considered.
- 8) 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.
- 9) The proposed plan change 13 will increase reverse sensitivity issues to an unmanageable extent for neighbouring orchards/vineyards. 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).
- 10) 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.
  - 11) 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 (Wooring Tree, Top 10 Campground to name just two) and are more appropriate for the Council to accept.
  - 12) Visual amenity of the surrounding area will be significantly impacted, Mt Difficulty hosts ~60,000 domestic and international visitors annually. The visual amenity from our Cellar Door will be impacted both during the day and at night. The visual amenity from our Cellar Door is one of its drawcards. Proposed plan change 13 will have a significant impact on the visual amenity from our cellar door and as such should be rejected.