

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: Thomas Alan Coull
(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:

Timing of the Proposal & the location of the proposed site and content of the Application of the Developer in respect of the matters outlined on the attached three pages.
(Please give details and continue on additional page if necessary)

My submission is:

The objectives 20.3.1, 20.3.8, 20.3.9, 20.3.2, 20.3.3, 20.3.5, 20.3.6, 20.3.7, 20.3.10 of the proposed change application & all associated policies & rule 45 per the attached pages 3-5. I also submit regarding the timing & location
(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:

Reject the application / Decline in the 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)



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)

20-6-18

Date

Electronic address for service of submitter:

thomascoull@gmail.com

Telephone No:

021 861 007

Postal Address:

P.O. Box 501

Cromwell 9342

Contact Person:

Mr T. A. Coull

(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.

20/11/2018

Submission to Central Otago District Council Plan

Re Proposed Plan Change 13

T. A. Coull

The proposed development is not appropriate because:-

1. It is remote from other existing residential areas;
2. It is not suitable to its surrounds environs;
3. The timing of the Application attempts, inappropriately pre-empted the impending district plan review of Central Otago District Council (CODC) and the Cromwell Master Plan process which the CODC is currently undertaking;
4. The proposed plan change 13 will have an immediate and untimely disproportionate effect on the small Cromwell community in relation to its' current population. The proposal has adverse effects on the environment and its' resources (like water and agricultural land);
5. Having regard to the above, the RMA ("the Act"), and the following comments it is my view that the proposed plan change should not be allowed.
6. The Act ensures that the concept of sustainable management is to mean managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic, and cultural well-being and for their health and safety while—
 - a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and
 - b) safeguarding the life-supporting capacity of air, water, soil, and ecosystems; and
 - c) avoiding, remedying, or mitigating any adverse effects of activities on the environment.

But in this case the location, and scale of the proposal, means that the effects generated by the proposal cannot be remedied or mitigated satisfactorily and consequently the Plan Change should be declined.

7. specifically some of the issues that arise are:-

Objective 20.3.1, 20.3.8, 20.3.9 – Efficient, co-ordinated, integrated green fields development

I oppose all policies and rules that support this objective because plan change does not achieve the purported objectives as:-

- Plan Change 13 is not an appropriately placed or logical progression for residential development for Cromwell at this time; and
- Cromwell is going through a process of a master plan and a district plan review and this plan change will undermine both those processes; and
- Currently there is insufficient infrastructure to support the proposal; and



Objective 20.3.2 - Objective – Diversity of housing product and housing affordability

I oppose all policies and rules that support this objective – the proposed density does not translate into affordable. The plan change puts forward lot sizes of 160 square metres with narrow roads over most of the property. Typically developments of this type are near a transport node or retail/service hub, but in this case the development is set in a paddock surrounded by highly incompatible uses.

Objective 20.3.3 – Well-designed built environment

I oppose all policies and rules regarding this objective – The urban design report is not very clear or properly establishing the desired density. I refer to the following issues:-

- The plan change will create a parking problems of considerable proportions on the proposed narrow streets; and
- Commuters Access to the gorge road will be problematic; and
- there are no adequate cycling or walking connections to the rest of Cromwell; and
- The design guidelines have been offered seem inadequate having regard to the expanding Cromwell and its natural attributes, landscape and open spaces.

Objective 20.3.5 – Parks and open space network

I wish to oppose all policies and rules regarding this objective. I note that, some mention has been made of greenways there is no comment concerning joining in with such spaces as may already exist in the Cromwell community/town and district. Furthermore there are none of the usual assurances offered in respect of the space in the event that the school does not go ahead.

Objective 20.3.6 – Road network

I oppose the rules and provisions that support this objective –the proposed roading does not seem to provide enough parking space which looks like being very problematic in the context of the Developers proposal and the Cromwell District generally. From my experience it is not untypical in this area to find that a resident (whether or not an Owner or a Tenant) has two cars, and quite possibly a caravan and/or trailer/boat on a trailer and one or more motor bikes as well.

In short, the parking and roading provisions are not appropriate or adequate in a Cromwell setting and raises various safety concerns whether or not a commute to Queenstown (west direction) or Wanaka or the Cromwell town centre is involved.

Further to this, the commute from Cromwell to Queenstown is cumbersome and dangerous with weather conditions and tourist drivers this would be magnified by the increase of commuters that this proposal would bring. The safety concerns that this would raise have not been addressed nor has the likely cost of congestion (both planned and unplanned).

Objective 20.3.7 – Public infrastructure

Recent workshops for the proposed Cromwell Master Plan Oppose clearly indicate that such an extension of infrastructure services to this side of the Cromwell town and district are not yet able to be accommodated and notwithstanding the Developers proposed funding this would not be viable for the community going forward, rather it would represent a significant rate impost on the



ratepayers and inevitably on tenants through rates and rental payment increases. Furthermore, please note that:-

- Has there been enough evidence provided of the likely increased burden on the Cromwell sewage and wastewater ponds bearing capacity?
- Other impacts on the Cromwell Community services already provided e.g. employment opportunities, libraries, recreation areas, swimming pools have not been taken mentioned. Cromwell with increased accommodation demands, both for residents and tourists, (i.e. long term and short term).

Objective 20.3.10 – Compatibility with surrounding activities

Cromwell is in an area that is limited for space due to the lake, and steep mountains and it exists within a much loved landscape. It is growing faster than any other place in NZ and needs careful planning in view of the obvious competition for suitable for varying purposes. The Developers application appears to try to jump the gun before the necessary studies have been completed and the community has had its say on a raft of difficult issues.

It also seem not all noise issues are adequately dealt with. I refer to noise from the adjoining motorsport park, adjoining orchards, airport and helicopter frost fighting noise and noise effects that come from adjoining the State Highway.

Other matters

- Unlawful subdivision works

Works in anticipation of the development along the road frontage have already been started by the developer. This shows a certain level of disregard for the Act and for our community or worse still, it could be considered to have the effect of suborning the whole planning process and attempting to persuade sectors of the community that this is a good idea, but before approval is given. I ask would not an abatement notice be usually required in such circumstances?

- Cromwell is a place of heavy machinery (storage and use) and all the industrial uses required and supporting such machinery and Industrial land is a rare and valuable resource therefore the Developers Application is of regional significance and to place residential land in this locality is not just counterintuitive it is wrong!
- Cromwell is a low light area, this has not been addressed.

