

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: Werner Murray (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:

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 plan change and all policies and rules. Also the location and timing. (Please give details and continue on additional page if necessary)

My submission is:

See 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:

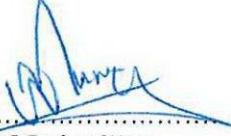
Decline the proposal in its entirety - does not meet the purpose of the RMA.

(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)

.....
19/06/2018

Date

Electronic address for service of submitter:

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Contact Person:

.....
Werner Murray
(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.

19/11/2018

Submission to Central Otago District Council Plan change 13

Werner Murray

The proposed development is out of centre, not suitable to its surrounds, not integrated into the community and above all pre-empts the district plan review that is a public process that Central Otago District Council are currently undertaking. The Cromwell Community (rate payers) have committed over \$1million to ensuring that this process is done right. While it is acknowledged that a land owner may request a plan change at any time my submission below will demonstrate how out of step and inappropriate the proposal is with the area that the objectives that it cannot meet part 2 of the RMA.

A subdivision of 800-900 dwellings is by no means a very large subdivision by global standards, in Queensland for instance this is about an average size for a master planned community. In the Cromwell Basin context however, proposed plan change 13 will grow a small community by almost double its current population. The adverse effects of this plan change on the environment, scarce and hotly contested resources (like water and agricultural land) and the cultural impacts on a community living within in the Cromwell Basin will be significant. As such it is my view that the purpose of the Act cannot be met should the proposed plan change go ahead.

In this Act, sustainable management means 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.*

Due to the location, and scale of the proposal, effects generated by the proposal cannot be remedied or mitigated and therefore it is my view that the proposed uses be avoided and the Plan Change should be declined.

I have grouped the issues that arise from the proposal under each objective that the applicant has put forward. This has chiefly been done to organise my thoughts.

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

Oppose all policies and rules that support this objective – While co-ordinated and efficient greenfields development are desirable outcomes for a district plan, especially in a town that is experiencing rapid growth, this plan change does not achieve this outcome for the following reasons.

- Plan Change 13 is not a logical progression for residential development for Cromwell,
- This plan change will result in out of centre development,

- Cromwell is going through a process of a master plan and a district plan review year at great cost in both time and money to the community and this plan change will undermine that process.
- Successful development needs to be supported by infrastructure which is not present
- Dealing with sequential land release could be done in a co-ordinated manner, For instance Rotorua has dealt with the issue of securing land that might be needed for future development at a future point in time by planning for this and zoning that land as future urban. This future urban land can be released in stages when/if needed. The zone should be left as yet to be determined as this area may well be suited to industrial development (pending the outcomes of the master plan and proposed district plan)

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

Oppose all policies and rules that support this objective - Increased density does not mean affordable housing on its own. The plan change puts forward lot sizes of 160 square metres with narrow roads over most of the property. Successful developments of this type typically are based around a transport node or retail/service hub, in order to justify the development. In this instance it has been thrown into a paddock surrounded by incompatible uses, and have percentages of different typologies that make sense from a community building point of view rather than being driven by increase in density only (most of the development site is area A which allows for high density residential development (160 sqm lots)).

Objective 20.3.3 – Well-designed built environment

Oppose all policies and rules that support this objective – The urban design report is not sufficient to show that density in this context can be done well. That coupled with the unacceptable car parking and roading provisions mean that the urban design objective cannot be achieved. I also refer to the following issues from an urban design point of view that are insurmountable problems:

- The plan change will create a parking nightmare the plan change is only proposing 1 car park per dwelling and the extra cars that usually park on the street will not be possible as they are also proposing narrow streets
- There is no public transport that can be relied on
- Commuters all heading to the gorge at the same time will clog the gorge and in turn the Lower Shotover Bridge at Lady's Mile
- there are no cycling or walking connections to where the development is proposed
- Very little in terms of design guidelines have been offered. Cromwell has become a world class destination – this has come about from a number of natural attributes, years of hard work through various industries and history of the area, some examples that spring to mind: pinot noir, cherries, landscape and open spaces, Bannockburn slucings being included into Landmarks/Whenua Tohunga. Poor design cheapens that basin especially as the entrance for visitors from Queenstown

Objective 20.3.5 – Parks and open space network

Oppose all policies and rules that support this objective, while some mention has been made of greenways there is no parks strategy that tie into the wider district. Further there is no assurance offered that the school are will remain in park it will either turn into a school and then additional dwellings or just additional dwellings should no school go ahead. At a minimum all parks land should be granted to Council as stage 1.

Objective 20.3.6 – Road network

Oppose all provisions that support this objective – while the proposed roading typologies look great in the drawings provided, they do not work in a Cromwell setting. I have completed a parking survey of the recently completed Summer fields subdivision in Cromwell and most dwellings have two cars and then either a work ute/caravan/trailer/bike present. People that can't afford a mortgage are renting rooms out in houses with people in those rooms having at least 1 car each – the worst case that I encountered was in Summer Fields Estate on Saturday 16th June at 11:00 in the morning was this dwelling with 4 cars and a boat all parked outside of a two space garage.



In short, the parking and roading provisions are not appropriate or adequate in a Cromwell setting.

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 cost of congestion – It would be conceivable that the commute could be extended by 20 minutes (each way), which would add 40 minutes to an already long day, this would have further safety implications.

The roading report lodged with the plan change should as a starting point be peer reviewed by a reputable traffic engineer and then provisions should be reviewed again at that point. However in the interest of saving the applicants money due to the insurmountable short comings of the roading and parking provisions in this location and the greater impacts that this proposal will have on the roading network declining the proposal on roading and traffic effects alone would be preferred.

Objective 20.3.7 – Public infrastructure

Oppose all provisions that support this objective – Extending services to this part of the basin at this point in time are not economically viable for the community in the long run. While it is acknowledged that the developer will indirectly fund the installation of the infrastructure (after which it will pass to the new home owners in the land cost), this will then become a council and ratepayer burden. Further to this I add:

- The wastewater ponds capacity have not been calculated only speculated, insufficient evidence provided in terms of capacity
- Infrastructure will be too expensive for a satellite development.
- Impact on Community and services offered - such as employment opportunities, libraries, recreation areas, swimming pools have not been taken into account. Cromwell does not have the services or conveniences to cater for some (840x3) 2500 people in our town.

Objective 20.3.10 – Compatibility with surrounding activities

Cromwell is in a basin that is constrained for space due to the lake, and steep mountains. Add to this the competition for good agricultural land, industrial land and land suitable for dwellings. As previously mentioned Central Otago District Council has spent considerable time and effort in addressing these issues in an appropriate and holistic way. This plan change request falls well short of conducting such an in-depth study, and is naïve in presuming that because the motorsport park and adjoining orchards have been dealt with by way of covenant that all compatibility issues go away. The airport has noise effects that extend beyond its boundaries. Gas guns that go all day, and helicopter frost fighting that starts up from 2-3am onwards have noise effects that reach from across the State Highway – these have not even been considered.

Reverse sensitivity from agricultural sprays on residential activities have not been adequately addressed.

None of this considers the integrated way in which the basin functions and what impacts this plan change will have on a small community that will almost be doubled by this plan change.

Other matters

- Unlawful subdivision works

Works in anticipation of the development along the road frontage have been started by the developer. This shows a certain level of disrespect for our community. I note that in his rush to start development he has constructed a wall structure and post and rail fence along with plantings of an undermined mature height, which are in breach of the District Plan. These earthworks, construction and planting are all subdivision works - it is best practice to assess these works at the time of subdivision application which will only be lodged should the Plan Change is approved. An abatement notice is requested as part of this submission.

- Industrial land matters this is a highly valuable resource as QLDC have discovered through their plan change process that is regionally significant this proposal will box future industrial growth in by placing residential to the south as well as that already exiting to the north.

- The plan change has not taken into account taking up our valuable soil resource they have said that the farm was not productive when they bought it but the assessment should be based on the soil resource as once subdivided it will be gone forever.
- Excess light emission is an issue in our district – this has not been addressed.
- NPS-UDC is not applicable to Cromwell. The approach taken by the Economic Assessment in section 2 of their report is therefore not applicable, as most issues and effects raised by the proposal may well be appropriate in a different location with different timing but do not apply to Cromwell in the location specified. Further to this, there is sufficient capacity in housing stock for the short to medium term and Central Otago District Council are currently through a Masterplan and District Plan review process planning for sufficient development capacity.
- The 32 evaluation falls short of looking at all the costs that could be attributed to the development. The report only considers a residential option – industrial uses have not been considered nor the potential expansion of the industrial area and the cost of this not only to Cromwell but also to the greater region over the medium term.
- Rural outlook will be compromised through the window to Cromwell from Quesntown.