CENTRAL OTAGO DISTRICT COUNCIL

CENTRAL OTAGO DISTRICT PLAN

PROPOSED PLAN CHANGE 14

SUMMARY OF DECISIONS REQUESTED

IN SUBMISSIONS & FURTHER SUBMISSIONS

IMPORTANT NOTES

- The Summary of Decisions Requested in submissions and further submissions contains a Submission Point Number for each summarised submission point and further submission point. These numbers have been attached to the submissions and further submissions for ease of reference.

- The Summary of Decisions Requested lists submitters to proposed Plan Change 14 alphabetically.

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For page number reference for the summary of a submission in the Summary of Decisions Requested see Addresses for Service list at pages i - iv

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SUMMARY OF DECISIONS REQUESTED IN SUBMISSIONS & FURTHER SUBMISSIONS ON PLAN CHANGE 14 : SHANNON FARM, CROMWELL

Submitter & Further Submitter Number & Name	Submission Summary	Sub Point Number	Decision Requested & Further Submission Summary
1. Christian Alberton **Further Submitter** **117 James Dicey**	**Support** Traffic can be effectively and safely accommodated on the existing road network and the existing town infrastructure network and services have ample capacity so no ratepayer impact of capital upgrade will arise due to the proposal.	1/1	Approve Plan Change 14. **117/1 James Dicey** Oppose Oppose submission 1 in its entirety. The submitter has not undertaken a full traffic analysis and understood the impact on Ripponvale Road nor the intersections to State Highway 6. Reject whole submission.
2. Gary Anderson **Further Submitter** **117 James Dicey**	**Support** Plan Change 14 supported in its entirety.	2/1	Approve Plan Change 14. **117/5 James Dicey** Oppose Oppose submission 2 in its entirety. No reasoning proposed for the support in submission. Reject whole submission.
3. Connor William Atherton **Further Submitter** **116.2 Cromwell Mountain Bike Club**	**Conditionally Support** We as a Club [Cromwell Mountain Bike Club (Cromtbc)] support PC 14 under the following circumstances: • The proposed recreation area be made available for mountain bike trail development by Cromtbc. • We aren't restricted to simply using existing trails on the land for mountain bike use. • Cromtbc is allowed the space to design and build multiple trails in the recreational area.	3/1	Approve with modifications ie. approve Plan Change 14 in its entirety including points raised in submission. **116.2/1 Cromwell Mountain Bike Club** Support Supports submission 3 in its entirety. The development of world class mountain bike trails in the proposed recreation zone will be a great asset for the community of Cromwell and Central Otago.

		• The trails built by Cromtbc will be accessible by anyone wishes to do so, not just Shannon Farm residents.		The submission seeks that Cromwell Mountain Bike Club is allowed to build multiple trails in the recreational area. The appropriate mechanism to allow the building of trails is amendment to standard [Rule] 4.7.6L to provide that cutting of mountain bike trails and tracks, including associated earthworks, within the Outstanding Natural Landscape area as identified on the structure plan in Schedule 19.23 is a permitted or controlled activity, or a similar amendment with this effect. Allow submission.
4.	Stacey John Bailey **Further Submitter** **117 James Dicey**	**<u>Support</u>** The proposal is a logical location for lifestyle/rural residential use being within the close proximity to Cromwell township. Will complement rather than compete with the existing Cromwell township by providing a focus on rural living activities. It complements the wider objectives of the Cromwell Master Plan.	4/1	Approve Plan Change 14. **117/2 James Dicey** <u>Oppose</u> Oppose submission 4 in its entirety. PC 14 conflicts with the Cromwell Masterplan, particularly the Spatial Framework. Does not complement the Masterplan, will compromise its integrity and scope. Reject whole submission.
5.	Alex Bartrum **Further Submitter** **116.2 Cromwell Mountain Bike Club**	**<u>Conditionally Support</u>** We as a Club [Cromwell Mountain Bike Club (Cromtbc)] support PC 14 under the following circumstances: • The proposed recreation area be made available for mountain bike trail development by Cromtbc. • We aren't restricted to simply using existing trails on the land for mountain bike use. • Cromtbc is allowed the space to design and build multiple trails in the recreational area. • The trails built by Cromtbc will be accessible by anyone wishes to do so, not just Shannon Farm residents.	5/1	Approve with modifications ie. approve Plan Change 14 in its entirety including points raised in submission. **116.2/2 Cromwell Mountain Bike Club** <u>Support</u> Supports submission 5 in its entirety. The development of world class mountain bike trails in the proposed recreation zone will be a great asset for the community of Cromwell and Central Otago. The submission seeks that Cromwell Mountain Bike Club is allowed to build multiple trails in the recreational area. The appropriate mechanism to allow the building of trails is amendment to standard [Rule] 4.7.6L to provide that cutting of mountain bike trails and tracks, including

				associated earthworks, within the Outstanding Natural Landscape area as identified on the structure plan in Schedule 19.23 is a permitted or controlled activity, or a similar amendment with this effect. Allow submission.
6.	Fred Bramwell **Further Submitter** **117 James Dicey**	**<u>Support</u>** The submitter supports the specific provisions of PC 14.	6/1	Approve Plan Change 14. **117/6 James Dicey** <u>Oppose</u> Oppose submission 6 in its entirety. No reasoning proposed for the support in submission. Reject whole submission.
7.	Max Edward Bruhns **Further Submitter** **117 James Dicey**	**<u>Support</u>** The development forms a well planned transition from urban land use in Cromwell town/township to surrounding pastoral and horticultural land uses.	7/1	Approve Plan Change 14. **117/3 James Dicey** <u>Oppose</u> Oppose submission 7 in its entirety. PC 14 conflicts with the Cromwell Masterplan, particularly the Spatial Framework. Does not complement the Masterplan, will compromise its integrity and scope. Reject whole submission.
8.	Geoffrey Byrne **Further Submitter** **117 James Dicey**	**<u>Support</u>** Fully supports Plan Change 14. Excellent for the future growth of Cromwell.	8/1	Approve Plan Change 14. **117/4 James Dicey** <u>Oppose</u> Oppose submission 8 in its entirety. PC 14 conflicts with the Cromwell Masterplan, particularly the Spatial Framework. Does not complement the Masterplan, will compromise its integrity and scope. Reject whole submission.

9.	Trevor Lyndon Carline **Further Submitter** **117 James Dicey**	**<u>Support</u>** Plan Change 14 provides a better alternative to more subdivision in the Rural [Resource Area] where significant areas have been developed into 8 ha lifestyle blocks and large areas of land are being inefficiently used.	9/1	Approve Plan Change 14. **117/9 James Dicey** <u>Oppose</u> Oppose submission 9 in its entirety. This is exactly a subdivision of prime rural land and goes in the face of submission 9. Reject whole submission.
10.	Raewyn Evelyn Chatfield **Further Submitter** **117 James Dicey**	**<u>Support</u>** Supports public access to hill tracks for recreation and more employment in Cromwell and surrounding area.	10/1	Approve Plan Change 14. **117/10 James Dicey** <u>Oppose</u> Oppose submission 10 in its entirety. Subdivision of land from rural to housing may have a short term benefit in terms of employment to build houses and infrastructure but long term will result in less employment due to removal of rural land from productive status. Short term view. Reject whole submission.
11.	Robert John Chatfield **Further Submitter** **117 James Dicey**	**<u>Support</u>** Supports promoting more sustainable growth in the Cromwell District with the expansion of the cherry orchard along with increased employment opportunities.	11/1	Approve Plan Change 14. **117/11 James Dicey** <u>Oppose</u> Oppose submission 11 in its entirety. Subdivision of land from rural to housing may have a short term benefit in terms of employment to build houses and infrastructure but long term will result in less employment due to removal of rural land from productive status. Short term view. Reject whole submission.

12.	Joanna Margaret Cooper **Further Submitter** **117 James Dicey**	**<u>Support</u>** • PC 14 will provide much needed lifestyle properties close to Cromwell and will be an attractive development near the entrance to Cromwell. • The provision of public access to the hill country will provide a great opportunity for recreation for locals and visitors alike with walking, biking etc and a significant portion of prominent hill country, fully visible from Cromwell, will be protected. • The development can be safely accessed from existing roading. • Provides a sustainable mix of lifestyle and horticulture which will provide growth and employment opportunities both on orchards and also for builders, contractors etc during construction phase.	12/1 12/2 12/3 12/4	Approve Plan Change 14. **117/16 James Dicey** <u>Oppose</u> Oppose submission 12 in its entirety. Lifestyle properties not needed in Cromwell – already too many in play and this will add to the loss of rural productive land. Reject whole submission.
13.	Cromwell Mountain Bike Club **Further Submitters** **101 Casey Adams** **102 Molly Adams** **103 Steve Aldridge** **105 Mac Anderson** **106 Alex Bartrum** **107 Layton Blakie** **108 Kaylee Butler** **109 Patience Cherrington** **110 Austin Clarke** **111 Jessica Cole** **112 Lachlan Cole** **113 Nathan Cole** **114 Nicola Jane**	**<u>Conditionally Support</u>** We as a Club [Cromwell Mountain Bike Club (Cromtbc)] support PC 14 under the following circumstances: • The proposed recreation area be made available for mountain bike trail development by Cromtbc. • We aren't restricted to simply using existing trails on the land for mountain bike use. • Cromtbc is allowed the space to design and build multiple trails in the recreational area. • The trails built by Cromtbc will be accessible by anyone wishes to do so, not just Shannon Farm residents.	13/1	Approve with modifications ie. approve Plan Change 14 in its entirety including points raised in submission. **101/1 Casey Adams, 102/1 Molly Adams, 103/1 Steve Aldridge, 105/1 Mac Anderson, 106/1 Alex Bartrum, 107/1 Layton Blakie, 108/1 Kaylee Butler, 109/1 Patience Cherrington, 110/1 Austin Clarke, 111/1 Jessica Cole, 112/1 Lachlan Cole, 113/1 Nathan Cole, 114/1 Nicola Jane Cole, 115/1 Aimee Coudret, 116.1/1 Cromwell Mountain Bike Club, 118/1 Josh Dicey, 119/1 Alyssa Dolphin, 120/1 Angus Drinnan, 121/1 Hadley Farquharson, 122/1 Duncan Fulford, 126/1 Nicola Hayward, 127/1 Allan Fenwick Henderson, 128/1 Isaiah Hoera, 129/1 Uziah Horne, 131/1 Miriam Ruth Houliston, 133/1 Andrew David Johnson, 134/1 Marie Kahukura, 135/1 Gareth Ford King, 136/1 Charles Labajos, 137/1 Sandra Langvik-Owen, 138/1 Mathilde Lawrence, 140/1 Nathan Low, 141/1 Andy**

	Cole
115	**Aimee Coudret**
116.1	**Cromwell Mountain Bike Club**
118	**Josh Dicey**
119	**Alyssa Dolphin**
120	**Angus Drinnan**
121	**Hadley Farquharson**
122	**Duncan Fulford**
125	**Helen Hanson**
126	**Nicola Hayward**
127	**Allan Fenwick Henderson**
128	**Isaiah Hoera**
129	**Uziah Horne**
131	**Miriam Ruth Houliston**
133	**Andrew David Johnson**
134	**Marie Kahukura**
135	**Gareth Ford King**
136	**Charles Labajos**
137	**Sandra Langvik-Owen**
138	**Mathilde Lawrence**
140	**Nathan Low**

McDonald, 142/1 Craig McFarlane, 143/1 Caleb McKinlay, 144/1 Katana McNoe, 146/1 Bevan Meiklejohn, 147.1 Andrew Menzies, 148/1 Georgina Middleton, 150/1 Kalle Oliver, 151/1 Keryn Oliver, 152/1 Philip Peter Oliver, 153/1 Kieran Douglas Parsons, 156/1 Daniel John Quinn, 157/1 Mark Ridder, 158/1 Quinn Roberts, 159/1 Brian Murray Sanders, 160/1 Kate Spriggs, 161/1 Matt Squires, 162/1 Leon Stevenson, 163/1 Mason Daniel Stretch, 165/1 David Arthur Tidey, 166/1 Simon Tierney, 168/1 Andrew Waite, 169/1 Morgan John Walker, 172/1 David S Webb, 173/1 Georgia Weir, 174/1 Simone Wilson, 175/1 Julian Young,

Support

Support submission 13 in its entirety. The proposed recreation area would be an excellent location for mountain bike trails and a walking track. Being of free access, the trails would be a valuable resource to the local community and visitors. Allow whole submission.

125/1 Helen Hanson

Support

Support submission 13 in its entirety. The proposed recreation area would be an awesome location for mountain bike trails and walk tracks. Free access!! Valuable resource for residents & visitors. Allow all of submission.

167/1 & 167/2 Charlotte Tovey

Support

Support submission 13 in its entirety. The proposed recreation area would be an excellent location for mountain bike trails and a walking track. Being of free access, the trails would be a valuable resource to the local community and visitors. The submitter would also like a dog park! Allow whole submission.

141 Andy McDonald
142 Craig McFarlane
143 Caleb McKinlay
144 Katana McNoe
146 Bevan Meiklejohn
147.1 Andrew Menzies
148 Georgina Middleton
150 Kalle Oliver
151 Keryn Oliver
152 Philip Peter Oliver
153 Kieran Douglas Parsons
156 Daniel John Quinn
157 Mark Ridder
158 Quinn Roberts
159 Brian Murray Sanders
160 Kate Spriggs
161 Matt Squires
162 Leon Stevenson
163 Mason Daniel Stretch
165 David Arthur Tidey
166 Simon Tierney
167 Charlotte Tovey

171.1/1 & 171.1/2 Kate & Rob Wardle

Support

The submitters oppose PC 14 on the grounds of loss of versatile horticultural soils due to residential lot size and reverse sensitivity issues which will bring conflict between horticulturalists and new residential folk. However, if PC 14 was accepted, then the submitters support the creation of mountain biking trails accessible to the general public.

The submitters do not support PC 14. However, if it goes ahead, the submitters think the creation of a public recreation area that includes mountain bike tracks (location of these should be subject to an ecological assessment so as to avoid the areas of eg. native grey shrubland that include at risk plant species) would be an asset to Cromwell residents as well as visitors. The public recreation area will also be an asset to walkers and horse riders in the local area. Getting more people active has great health benefits. If PC 14 goes ahead the creation of public recreation area and mountain bike trails supported.

168	**Andrew Waite**			
169	**Morgan John Walker**			
171.1	**Kate & Rob Wardle**			
172	**David S Webb**			
173	**Georgia Weir**			
174	**Simone Wilson**			
175	**Julian Young**			
14.	Simon Mathew Crosbie	**Support** Supports Plan Change 14 as it is a positive subdivision for Cromwell due to its land size and proposed style, which will only benefit Cromwell future as the hub.	14/1	Approve Plan Change 14.
15.	Glen Darling **Further Submitter** **117 James Dicey**	**Support** This will be a great move forward for employment opportunities and walking tracks. A great asset to the local community.	15/1	Approve Plan Change 14 without amendment. **117/12 James Dicey** Oppose Oppose submission 15 in its entirety. Subdivision of land from rural to housing may have a short term benefit in terms of employment to build houses and infrastructure but long term will result in less employment due to removal of rural land from productive status. Short term view. Reject whole submission.
16.	Stephanie Davey **Further Submitters** **117 James Dicey** **130 Horticulture New Zealand**	**Support** There seem to be plenty of positives coming from this in terms of more employment and the provision of worker accommodation to go alongside the expansion. Also the opportunity to have access to hill country would be amazing. Supports the protection of elevated areas.	16/1	Approve Plan Change 14 as it [is] with provision to protect elevated areas and sensitive landscaping. **117/13 James Dicey** Oppose Oppose submission 16 in its entirety. Subdivision of land

				from rural to housing may have a short term benefit in terms of employment to build houses and infrastructure but long term will result in less employment due to removal of rural land from productive status. Short term view. Reject whole submission. **130/1 Horticulture New Zealand** Oppose Oppose submission (16/1) in its entirety. As drafted PC 14 provides no certainty that worker accommodation will be provided. It is not identified on the structure plan or proposed plan provisions. Also, the rules only require 60% of trees to be planted in the expanded orchard before residential development and there is the ability to apply for resource consent to forego this requirement. Reject decision sought.
17.	Abbey Louise Deroles **Further Submitter** **117 James Dicey**	**Support** Fully supports Plan Change 14 for increased employment opportunities, provides greater supply and diversified stock to the local housing market.	17/1	Approve Plan Change 14. **117/14 James Dicey** Oppose Oppose submission 17 in its entirety. Subdivision of land from rural to housing may have a short term benefit in terms of employment to build houses and infrastructure but long term will result in less employment due to removal of rural land from productive status. Short term view. Reject whole submission.
18.	James Dicey **Further Submitters** **171.2 Kate & Rob Wardle**	**Oppose** The submitter considers that PC 14 will: 1. Result in a loss of a substantial amount of versatile soils due to residential subdivision of rural land. 2. Result in reverse sensitivity effects both from noise (farming, motorsport and planes) and spray drift. 3. Act against the Cromwell Masterplan Spatial Framework which seeks to preserve rural land and ensure	18/1 18/2 18/3	Decline Plan Change 14. If not declined impose conditions which will address issues 1. – 7. as detailed in submission. **171.2/1 Kate & Rob Wardle** Support Supports submission points 18/1, 18/2, 18/3 and 18/6,

		residential development is confined to defined areas. 4. Act against the Cromwell airport which currently has no noise contours and no airport protection zone. 5. Provide light pollution to the Cromwell Basin due to the altitude of the proposed residential development. 6. Increase traffic on Ripponvale Road which is not sized for the number of people potentially living in the proposed residential zone. 7. Increase traffic on both junctions of Ripponvale Road and State Highway 6 as well as where Ord Road meets State Highway 6.	18/4 18/5 18/6 18/7	and support declining PC 14. Far too much productive land has already been lost to urban and rural residential developments, both within Central Otago, and nationally. We need to safeguard our ability to grow horticultural products, especially with the need for people to eat more plant based foods from a zero carbon and health view point. Conflict between horticultural activities and residential neighbours is well documented. This Plan Change would effectively create a suburban hub within an existing horticultural area, which will only bring about problems for all parties. Allow submission 38 in full. However, the further submitters do not believe that point 18/1 can be addressed by any modification to PC 14; so they seek that the submission "Decision Sought" be confined to declining PC 14 in its entirety.
19.	Robin Henry Maguire Dicey **Further Submitter** **117 James Dicey**	**<u>Oppose</u>** The specific provisions of the proposal that the submission relates to are: • The wastage of valuable potentially productive agricultural land. • PC 14 is not in line with the Masterplan. • The flatter and gently sloping areas should not have houses built on them – thus any subdivision for this purpose should not be allowed. • The proposal is inimical to the Masterplan.	19/1 19/2 19/3 19/4	Plan Change 14 should be declined as it does not accord with the Masterplan. The flatter and gently sloping areas should not be included in the proposal. **117/17 James Dicey** <u>Support</u> Support submission 19 in its entirety. The submitter correctly identifies conflict of PC 14 with the Masterplan. Support whole submission.
20.	William Robert Dunbar	**<u>Support</u>** This is the type of development which best suits Cromwell with a great mix of horticulture, public access and recreational facilities and lifestyle blocks.	20/1	Approve Plan Change 14.
21.	Marg and Gerrard Eckhoff	**<u>Oppose</u>** • The submitters have lived at Letts Gully near Alexandra for 7 years and their submission is based on the actual	21/1	Decline Plan Change 14.

Further Submitters
117 James Dicey
130 Horticulture New Zealand

and practical experience of co-existence between cherry growing and housing developments. Noise generated which travels beyond the boundary of the person or industry who generate such noise is a genuine "pollution of the commons"; and the RMA requires all to mitigate against environmental effects and the mitigation of noise is the responsibility of those who are responsible for the noise. The concept of reverse sensitivity is unacceptable as it is often used as an excuse for outdated practices.

- Based on years of practical experience PC 14 is opposed as integrated housing developments and cherry growing are not compatible. 21/2

Frost Fans

- Regardless of the number of blades frost fans generate noise levels that are completely unacceptable. Double glazed housing even at a distance of 300 metres cannot exclude the "wind slap". Where a number of fans are operating, the accumulative effect of the noise is unbearable at a time (night) when sleep is so essential for ones physical and mental health. Reducing and preferably eliminating the use of frost fans where the audible nature is impacting on the wider public is important. The fans near the submitters operate well before bud burst; indeed they are even used after harvest which is completely unacceptable. The submitters draw attention to the report by Novo Group dated 7 November 2019 commissioned by CODC : Noise Assessment Addendum. 21/3

Bird Scarers

- No bird scaring devices should be allowed under any circumstances. Netting of cherry trees is now standard practice by progressive orchardists which eliminates summer noise and fosters significant social harmony as a result. Orchard workers and pickers hearing must be impacted by high frequency bird scarers. The use of 21/4

No frost fans can be operated where a singular and/or accumulated noise levels impact on neighbouring housing where their (frost fan) noise can be heard inside a dwelling.
All new cherry plantings must be covered by bird netting.
All existing plantings of commercial cherry trees should be progressively netted.
No spray drift be allowed.

117/18 James Dicey
Support
Support submission 21 in its entirety. Reverse sensitivity issues correctly identified (frost fans, spray drift, bird scarers). Support whole submission.

130/2 Horticulture New Zealand
Oppose in Part
Oppose in part submission (21/1-21/7). The relief sought by the submitter in relation to legally established horticultural activities (frost fans, bird scarers and spray drift) and the suggested requirement to cover crops goes beyond the scope of the plan change. Accept decision sought to decline plan change; reject decisions sought that are beyond the scope of the plan change.

	shotguns to kill birds allows for pellets to travel up to approximately 400 metres. • No mist nets should be allowed as native birds are also caught. It should also be noted that the Chinese who purchase a lot of our fruit, believe birds carry wisdom. The cultural sensitivity around shooting birds is therefore a real issue.	21/5
	<u>Spray Drift</u> • No spray drift can be allowed. A buffer zone planted with trees should be grown to retain sprays within the property. Please note that orchard workers are compelled to wear fully protective breathing apparatus. Near neighbours are exposed to toxic chemicals. That must not happen.	21/6
	• Comment in the application that appropriate management can control or mitigate sounds that disturb others is simply wrong. Whose management? Under what conditions? Whose value system is applied through management, the orchard interests or the neighbours best interest?	21/7
22. Teri Anne Edwards **Further Submitter 117 James Dicey**	**<u>Oppose</u>** The specific provisions of PC 14 that the submission relates to are: • Reverse sensitivity effects – setbacks and amenity plantings will not manage potential issues. • Rural lifestyle development must avoid adverse effects on surrounding land uses. • The submitters concern is that "reverse sensitivity" is now happening in all horticultural areas, nationwide, and is already active in this one. While local government are encouraging these developments (in this case double the number of lifestyle blocks being applied for) regulations should also be put in place that protect the horticulturalist/agriculturalist and allow them to continue without the antagonism of "reverse sensitivity" and its	22/1 22/2 22/3

In response to reverse sensitivity effects:
- Protect the existing activity through rules in District Plans.
- Require that the new activity enter into a "no complaints" covenant via a land encumbrance.

117/19 James Dicey

<u>Support</u>

Support submission 22 in its entirety. Reverse sensitivity issues correctly identified (frost fans, spray drift, bird scarers). Support whole submission.

		exponents from issues such as pest and weed control/fertilising/frost fighting, as well as helicopters for water damage and/or fruit splitting/additional activity from seasonal workers and accommodation (eg. parking) /pruning/netting/bird scaring, and so on. • Society needs to balance the right to grow versus the right to subdivide and the submitter has provided an abstract from the NZ Journal of Environmental Law entitled "Reverse Sensitivity – The Common Law Giveth, and The RMA Taketh Away". • Rural land fragmentation is detrimental to land conservation and economic gain, and discourages farmers from adoption of agricultural innovations. The best land for agriculture and horticulture is being lost at the fastest rate to housing and hobby farms. The submitter realises that there is little one can do to stop these developments and that many argue that lifestyle blocks are productive however it is interesting to note that few owners of these lifestyle blocks earn the majority of their income from their land.	22/4 22/5	
23.	Jeanine Shelley Ellis **Further Submitter** **117 James Dicey**	**<u>Support</u>** This proposal provides lifestyle options that do not compete with existing subdivisions – offering diverse housing options to the local market. The neighbouring cherry orchard will increase its cherry capacity into Shannon Farm which will promote community growth and employment. Provision for public access to hill tracks.	23/1	Approve Plan Change 14. **117/23 James Dicey** <u>Oppose</u> Oppose submission 23 in its entirety. Cromwell has already got a range of residential developments. Cherry farm expansion potential in the future will actually contract with the residential subdivision on land highly suitable for the production of cherries. Reject whole submission.
24.	Fire and Emergency New Zealand	**<u>Conditionally Support</u>** • The Fire and Emergency New Zealand Act 2017 (FENZ Act) establishes the governance, management and	24/1	Approve Plan Change 14 with modifications such that Rule 4.7.2(ii)(vi) is amended to say:

Further Submitter

155 Public Health South

operational arrangements for protecting life and property from fire and other emergencies in New Zealand.

- FENZ recognises the importance of PC 14 in enabling additional housing and managing future development in the Central Otago District. 24/2
- The risk of fire represents a potential adverse effect of low probability but high potential impact. FENZ has a responsibility under the FENZ Act to reduce the incidence of unwanted fire and the associated risk to life and property. PC 14 provides an opportunity to better facilitate fire safety and fire prevention activities by including appropriate provisions which will enable people and communities to provide for their health and safety with regard to fire safety, fire prevention, and fire extinction. 24/3
- The provision of adequate fire fighting water supply and fire fighting access is critical. It is important to FENZ that any new dwelling or land use that does not have access to a reticulated water supply has access to an adequate fire fighting water supply of some kind. This essential emergency supply will achieve the purpose of the RMA. 24/4
- The New Zealand Fire Service Firefighting Code of Practice SNZ PAS 4509:2008 is a non mandatory NZ standard that sets out the requirements for firefighting water and access. FENZ considers that the best way to provide a consistent approach to mitigating the actual and potential effects of fire across the District is to include specific standards in District Plans. 24/5
- PC 14 states that the majority of the plan change area can be connected to the Cromwell reticulated water supply through the installation of a new 150mm main along Ripponvale Road. There are no requirements within the existing District Plan which require newly subdivided properties to provide a firefighting water supply in accordance with the requirements of the Code of Practice. It is noted however that FENZ has a 24/6

For an application for resource consent made under Rule 4.7.2(ii) such subdivision shall provide:

…

- *A water supply connection to newly created lots or dwellings, that complies with the provisions set out in the New Zealand Fire Service Firefighting Code of Practice SNZ PAS 4509:2008.*

155/1 Public Health South

Support

Supports submission point 24/4. Public Health South supports the need for FENZ to have access to a fire fighting water supply. Public Health South recommends the reticulation of drinking water and wastewater, which would also provide access to a fire fighting supply. Incorporate relative provisions into the plan; acknowledge the need for access to a fire fighting supply through a reticulated source.

		Memorandum of Understanding [MoU] with the CODC which states that "at the time a dwelling is erected on any building platform, domestic water and firefighting storage is to be provided". • While the MoU is welcome, the lack of rules and standards in the District Plan means that Council would have limited ability to require firefighting water supply to be provided to newly created lots. FENZ considers that specific standards for firefighting water supply are needed to provide certainty and, ultimately, to manage the fire risk from new development in the PC 14 area.	24/7	
25.	Chante Fleming **Further Submitters** **117 James Dicey** **130 Horticulture New Zealand**	**<u>Support</u>** PC 14 will provide employment opportunities for locals with much needed worker accommodation. It will also be great to have some rural lifestyle blocks on the market too.	25/1	Approve Plan Change 14. **117/15 James Dicey** <u>Oppose</u> Oppose submission 25 in its entirety. Subdivision of land from rural to housing may have a short term benefit in terms of employment to build houses and infrastructure but long term will result in less employment due to removal of rural land from productive status. Short term view. Reject whole submission. **130/3 Horticulture New Zealand** <u>Oppose</u> Oppose submission (25/1) in its entirety. As drafted PC 14 provides no certainty that worker accommodation will be provided. It is not identified on the structure plan or proposed plan provisions. Reject decision sought.
26.	Duncan Fulford **Further Submitter** **116.2 Cromwell**	**<u>Conditionally Support</u>** We as a Club [Cromwell Mountain Bike Club (Cromtbc)] support PC 14 under the following circumstances: • The proposed recreation area be made available for	26/1	Approve with modifications ie. approve Plan Change 14 in its entirety including points raised in submission.

	Mountain Bike Club	mountain bike trail development by Cromtbc. • We aren't restricted to simply using existing trails on the land for mountain bike use. • Cromtbc is allowed the space to design and build multiple trails in the recreational area. • The trails built by Cromtbc will be accessible by anyone wishes to do so, not just Shannon Farm residents. We as a Club [Cromwell Mountain Bike Club (Cromtbc)] support PC 14 under the following circumstances:		**116.2/3 Cromwell Mountain Bike Club** Support Supports submission 26 in its entirety. The development of world class mountain bike trails in the proposed recreation zone will be a great asset for the community of Cromwell and Central Otago. The submission seeks that Cromwell Mountain Bike Club is allowed to build multiple trails in the recreational area. The appropriate mechanism to allow the building of trails is amendment to standard [Rule] 4.7.6L to provide that cutting of mountain bike trails and tracks, including associated earthworks, within the Outstanding Natural Landscape area as identified on the structure plan in Schedule 19.23 is a permitted or controlled activity, or a similar amendment with this effect. Allow submission.
27.	Bill Godsall	**Support** PC 14 supported based on Shannon Farm providing public access and recreation opportunities for the general public.	27/1	Approve Plan Change 14.
28.	Lynda Gray & Cam Dykes **Further Submitter** **117 James Dicey**	**Oppose** • PC 14 is opposed due to the high likelihood that cherry orchard developments within this area will utilise 'frost fans' that will seriously impact on the night-time sleep and therefore health and wellbeing of residents not only in the integrated development but further afield. • The submitters' concerns and assertions are based on their own experiences having lived at 115 O'Neill Lane (near Alexandra) since 2001. Over the last 12 to 18 months, two orchards either side of the submitter's property have installed frost fans. One orchard is about 500 metres from their house, the other about 750 metres. The noise from these fans in the wee small hours is unreasonable, offensive and objectionable. The submitters are not alone in this opinion with a group of 50+ residents also taking exception to the night-time	28/1 28/2	Decline Plan Change 14 and retain the land subject to the Rural Resource Area because of the failure yet of the CODC to amend rules in the District Plan around the placement and operation of 'frost fans'. **117/20 James Dicey** Support Support submission 28 in its entirety. Reverse sensitivity issues correctly identified (frost fans, spray drift, bird scarers). Support whole submission.

	activity.		
	• The submitters are not opposed to development and recognise the need to provide available land for the demand for residential growth. However this growth needs to be structured, planned and balanced to meet the basic rights and expectations of both residents and primary industries.	28/3	
	• The submitters are both from primary industry backgrounds and totally accept their orcharding neighbours rights to conduct their business but draw the line at night time noise – which can last up to 10 hours, and over several months of the year well beyond the 'frost fighting' time – which exceeds WHO acceptable limits.	28/4	
	• The submitters are frustrated with the orchardists and the CODC who appear to be dragging the change in making amendments to the District Plan rules around the use and operation of frost fans. However, to their credit, they have commissioned a report (Novo Group) which pointed to the need for more noise testing. The two orchards in question are insisting on not one but two peer reviews.	28/5	
	• If PC 14 proceeds cherry developments with 'frost fans' will appear and severely affect rural residents use and enjoyment of their properties, their quality of life and their health.	28/6	
29. David James Griffin **Further Submitter** **117 James Dicey**	**<u>Oppose</u>** • The specific provisions of PC 14 that the submission relates to are the increasing size and traffic flow of Ripponvale Road throughout different seasons, the aesthetic coherence and recreational attributes of the rural area, the water supply and concerns for emergency services eg. fire fighters management of existing rural business.	29/1	Decline Plan Change 14. Only approve if the sections are made to the smallest being 2 hectares and alternatives to emergency services access and traffic concerns are resolved. **117/24 James Dicey** <u>Support</u>
	• PC 14 provides for five 'rural lifestyle areas'. Living in a rural area was a choice everyone on Ripponvale Road	29/2	Support submission 29 in its entirety. Loss of rural character, particularly in the highly visible part of the

chose because it meant they were away from town and neighbours weren't in close proximity. Living in a rural part of a town provides more aesthetically pleasing views and scenery as well as the use of more recreational land, for example more orchards. The proposal to add sections that are as small as 2000m^2 would mean that it is not the correct rural feel with sections in the residential areas becoming larger than this. It would change the whole aesthetic appeal of Ripponvale Road and overall become an over populated area. This would start to suggest the Ripponvale Road was becoming more residential than rural which itself would create more and more issues.		ridge above the sloping land. Identifies reverse sensitivity issues. Support whole submission.
• Throughout different seasons during the year Ripponvale Road is always busy. Reference is made to the race course and summer traffic buying locally grown fruit. Adding more "rural lifestyle areas" would only add to this increase of traffic. With farmers using the land across the road from PC 14 there are frequently cars parked on the side of the road; and during summer pickers employed by various orchards use both sides of the road to park vehicles, creating hazards for the residents of Ripponvale Road. Adding these smaller sections to fit more houses into one area is only going to add to the amount of traffic on the road that is already starting to get over populated.	29/3	
• The submitter is President of the Ripponvale Community Water Scheme and sees major issues with the proposal to add more housing. This is because there are already problems with rural water tanks. Adding more houses means that there is more chance of emergency services such as fire fighters needing the use of abundant amounts of water. If an emergency such as a fire would occur, the risk of not having enough water in the tanks to resolve the situation would be another factor to consider.	29/4	
• Adding more housing close to orchards on Ripponvale Road creates problems. It means that nearby orchards won't be able to spray when required because of the	29/5	

		residue that could drift, they won't be able to frost fight at early hours of the day and night and bird scaring would become limited. All of these things are key factors of an orchard that need to be performed in order to keep the orchard running and profitable. The orchards provide a lot of full time and seasonal work in the area which in turn provides funds to keep Cromwell alive not to mention the NZ economy. Unless the CODC is willing to offer compensation to orchardists for loss of income as a result of poor decision making. If PC 14 proceeds it will set a precedent for all other developers to purchase orchards in Ripponvale and subdivide down to 2000m^2. This has implications for orchardists next door in terms of spraying, frost fighting, bird scaring and other rural/orchard activities that will be banned as we have seen lately in Alexandra and Cromwell.		
30.	Warwick Grimmer **Further Submitter** **117 James Dicey**	**<u>Support</u>** PC 14 supported as it seeks to address Cromwell's current and future growth pressures. It provides for growth to meet the demand for rural/residential lifestyle living within an area experiencing growth pressures. Reverse sensitivity effects well managed through setbacks and amenity edge plantings. A very well planned proposal.	30/1	Approve Plan Change 14. **117/25 James Dicey** <u>Oppose</u> Opposes submission 30 in its entirety. The Masterplan provides for future growth, does not need PC 14. Reverse sensitivity cannot be fully managed with setbacks and amenity plantings. Reject whole submission.
31.	Heidi Caroline Hall	**<u>Support</u>** It appears that the submitter supports PC 14 due to: • Creation of public access to hill country area. • Protection of hill area from high density housing. • Sustainable growth of the Cromwell area.	31/1	Approve Plan Change 14.

32.	John Hare	**Support** The development will offer a great range of lifestyle block sizes giving buyers more choice. At the same time it allows for an increase in the productive use of land for the expanded cherry orchard. It provides for growth and demand for rural/lifestyle blocks within an area experiencing growth pressure.	32/1	Approve Plan Change 14.
33.	Adam Hart	**Support** • PC 14 will provide a range of different sized lifestyle blocks which will help meet current demand and provides more diversity of choice for residents. • The Shannon Farm lifestyle development also enables the cherry orchard to be doubled in size which brings economic benefits to Cromwell. • PC 14 also protects the high country area and allows public access to this area for all, providing a valuable recreation area for locals and visitors.	33/1 33/2 33/2	Approve Plan Change 14.
34.	Dana Audrey Henderson	**Oppose** • The specific provisions of PC 14 that the submission relates to are increased residential land owners in a lifestyle block area/orcharding areas. • Adding a residential subdivision to the current developed lifestyle blocks and developed cherry growers along Ripponvale Road is not favoured due to traffic generation, noise disturbance from frequent road use and the unlikelihood that residential land holders are aware of [how] lifestyle blocks are run and enjoyed.	34/1 34/2	Decline Plan Change 14 – there be no residential subdivisions placed on Ripponvale Road.
35.	Ian & Bev Henderson	**Oppose** • The specific provisions of PC 14 that the submission relates to are the creation of allotments smaller than what is currently allowable ie. sections smaller than an 8	35/1	Decline Plan Change 14.

		hectare average. The submitters oppose this as they wish to retain rural zoned land as rural zoned land. • Do not allow Ripponvale Road to continue to be carved up into small allotments as is currently being allowed. The submitters' orchard business will be adversely affected by a residential style subdivision. • The submitters seek no further subdivision activity that creates residential size allotments on and close to Ripponvale Road that will impede on their rural lifestyle and their orchard business.	35/2 35/3	
36.	Katie Angela Hill **Further Submitters** **117 James Dicey** **130 Horticulture New Zealand**	**<u>Oppose</u>** • Allowing a 'rural lifestyle subdivision' near a cherry orchard, unless the points made in the submission are stipulated in the Plan. The CODC should have learnt by now that orchards and residential sections do not mix. • The submitter is opposed to PC 14 unless there are very strict regulations surrounding the change. A cherry orchard and a residential dwelling cannot easily co-exist and the former can make life hell for the occupants of the latter. The CODC are well aware of the problems the residents surrounding Leaning Rock Cherries have in terms of wind turbines and bird scaring noise.	36/1 36/2	Approve Plan Change 14 with modifications such that: 1. No frost fans allowed. Instead allow thick nets (which are already commercially available) which protect crops against frost, rain and wind and birds, and reduce the need for pesticides and fungicides. 2. No audible bird scaring such as gun shots or sirens, orchards must use nets only. 3. No spraying within a nominal distance from a boundary (research needed to advise on safe distance with regard to health and safety). Or Decline Plan Change 14. **117/21 James Dicey** <u>Support</u> Support submission 36 in its entirety. Reverse sensitivity issues correctly identified (frost fans, spray drift, bird scarers). Support whole submission. **130/4 Horticulture New Zealand** <u>Oppose</u> Oppose submission (36/1 & 36/2) in its entirety. The relief sought by the submitter in relation to legally established horticultural activities (frost fans, bird scarers and spray drift) and the suggested requirement to cover crops goes beyond the scope of the plan change. Reject decision sought.

37.	David Holden	**Support** A lot of thought has gone into creating different size blocks to cater for all uses.	37/1	Approve Plan Change 14.
38.	Horticulture New Zealand **Further Submitters** **117 James Dicey** **155 Public Health South** **170 Kate Wardle**	**Oppose** • The submission contains background information with respect to Horticulture New Zealand, the economic significance of the horticulture industry and the principles that Hort NZ considers in assessing the implementation of the RMA. Hort NZ has worked with Summerfruit New Zealand in preparing this submission being Hort NZ's most impacted Product Group[1]. <u>The Current State of Horticulture in the Central Otago District</u> • There are approximately 76 growing operations in the Central Otago District. The combination of soil and climate means that Central Otago is especially suited to growing high quality crops. Stone fruit such as; cherries, apricots, peaches and nectarines, and pipfuits (predominantly apples) are dominant crops. <u>Cromwell Basin and Ripponvale area</u> • The Cromwell basin is an attractive place for orcharding due to the combination of soils, relatively flat land, climate, access to water and labour. • The plan change site is in the immediate vicinity of significant orchards and the 45 South regional packhouse. There is approximately 217ha of orchards in the Ripponvale area. This includes 82ha of cherries and 135ha of other fruit namely; cherry plums, plums, peaches, nectarines, apricots, apples and pears. Image 1 as presented in the submission shows the location of orchard types within the Ripponvale area. • The value of the fruit produced in the Ripponvale area in the 2017/2018 season was approximately $19.2 million.	38/1 38/2 38/3 38/4 38/5	Decline Plan Change 14 in its entirety. **117/26 James Dicey** <u>Support</u> Support submission 38 in its entirety. High value of fruit growing in the region will be compromised if the subdivision is allowed, compromising economic returns for the CODC region. PC 14 will compromise food security by withdrawing productive land from the supply of suitable land in the CODC and in NZ. Fragmentation of urban developments – the successful application of PC 14 will set a precedent for additional developments outside the spatial boundary proposed in the Masterplan. Reverse sensitivity issues correctly identified. Loss of productive land and the change signalled by the NPS – HPL should mean that this land is protected for rural uses. PC 14 will result in loss of Rural Character. Support whole submission. **155/2 Public Health South** <u>Support</u> Supports submission point 38/17. Public Health South supports the acknowledgement of access to environments that have safe air quality. Reverse sensitivity can cause unwanted exposure to chemicals and pesticides which can result in adverse health effects[1]. Incorporate relative provisions into the plan; acknowledge the potential reverse sensitivity effects that may arise from legitimate horticultural activities. [1] Kim, K et al., (2017). Exposure to pesticides and the associated human health effects. Sci Total Environ.Jan 1;575:525-535

Due to frost this value reduced by approximately 40% to $11.52 million in the 2018/2019 season.

- In addition, the Ripponvale packhouses supports a further 147ha of cherry plantation within the wider Cromwell growing area, with a value of approximately $7 million in the 17/18 growing season, and $4.2 million in the 2018/2019 season. Therefore, the overall value of fruit packed in Ripponvale was $26.2 million in the 17/18 season and $15.72 million in the 18/19 season. This variance in value shows the industries susceptibility to environmental factors and the importance with frost control mechanisms that without a zero yield is highly likely. 38/6
- Horticulture is a significant land use in the Cromwell basin area. There are significant economic and social benefits of horticulture to the District that are put at serious risk by the proposed plan change. 38/7

Food security and the role for Central Otago District

- Population growth not only increases demand on housing supply, it also generates and necessitates an increased demand on food supply. There is a general assumption that New Zealand is the land of plenty and we will always have enough locally-grown food to feed our population, supplemented by imported food where there is demand. But things are changing fast. 38/8
- Prime fruit and vegetable growing land is being squeezed by rapid growth. Increasing urbanisation places additional pressure on, and competition for, the natural resources and infrastructure also critical for growing fruit and vegetables. 38/9
- Current projections around New Zealand's expected population increase and annual food volumes available for consumption in New Zealand show that domestic vegetable supply will not be able to sustain our future population consumption needs.[2] When supply is short and demand high, prices are subject to wide variations. 38/10

155/3 Public Health South

Support

Supports submission point 38/19 in its entirety. Public Health South supports the acknowledgement of reverse sensitivity of noise. Although noise has not been recognised in the PHS original submission PHS supports the submitters comments and recognises noise as a public health issue.

Unwanted or undesirable noise puts pressure on individual or community health, wellbeing and restricts an individual's enjoyment of the environment.[2] Adverse effects can include both negative physiological and psychological health outcomes.

The consequences of environmental noise are associated with many adverse health outcomes, including both auditory and non-auditory health outcomes. Non-auditory health outcomes include: noise annoyance, sleep disturbance, cardiovascular disease, and effects on cognition and learning.[3]

Mitigation measures are therefore important to reduce the negative health outcomes of noise.

Incorporate relative provisions into the plan; acknowledge the potential reverse sensitivity effects that may arise from legitimate horticultural activities.

[2] Canterbury District Health Board, Community & Public Health, *Environmental noise can affect your health.* 2019. https://www.cph.co.nz/your-health/noise/ (accessed Feb 12, 2020).

[3] Basner, M., Babisch, W., Davis, A., Brink, M., Janssen, S., & Stansfield, S. (2014). Auditory and non-auditory effects of noise on health. *The lancet,* 383(9225), 1325-1332.

This can make healthy food unaffordable for many New Zealanders and often hits vulnerable communities the hardest.

- HortNZ have made projections around annual food volumes available for consumption in New Zealand[3]. With New Zealand's population expected to reach 5,045,000 during 2020 (based on annual growth between 1.5-2%), domestic food supply will not be able to sustain our future population consumption needs. This highlights the importance of food security, land production and future-proofing the availability of resources to supply our growing population. 38/11
- Production of quality fresh produce requires access to versatile rural production land. There are a number of factors that contribute to versatile land including soil quality, climate, access to water, access to transport linkages, labour and markets and an enabling regulatory framework. 38/12
- As well as a high demand export market, Horticultural production within the Central Otago District contributes to the food supply for local communities and the rest of New Zealand. Accordingly, the Central Otago District Council needs to make appropriate planning decisions to ensure continued food production to meet current and future food demand. 38/13

<u>Urban encroachment and Horticulture</u>

- The supply and use of land suitable for quality horticultural production is under pressure from urban development across New Zealand. Land fragmentation and reverse sensitivity issues are inhibiting horticultural operations. Where horticulture is established on production land, a considerable limiting factor to high production of quality fresh produce are the reverse sensitivity effects of urban encroachment. 38/14
- HortNZ is at the forefront of discussion and planning processes around New Zealand that are considering urban intensification and land supply issues to ensure a 38/15

170/1 Kate Wardle

<u>Support</u>

Supports submission 38 in its entirety and in particular submission points 38/16 – 38/19 and 38/20 – 38/31. Far too much productive land has already been lost to urban and rural residential developments, both within Central Otago, and nationally. We need to safeguard our ability to grow horticultural products, especially with the need for people to eat more plant based food from a zero carbon and health view point. The submission outlines the further submitter's concerns. Allow submission 38 in full.

sustainable response to urban growth pressures. It is our experience that a key planning consideration that is often overlooked is the reverse sensitivity effects on horticulture from urban encroachment, the value of soils as a resource and rural character.

Reverse sensitivity

- Reverse sensitivity occurs when occupants of a new activity or use (for example, a lifestyle block or new urban neighbourhood) complain about the effects of an existing, lawfully established activity or use (for example, noise or smell from industry or farming). This can have the effect of imposing economic burdens and operational limitations on the existing activity or use thereby reducing their viability, or even cause the operation to cease entirely. 38/16
- Horticulture is labour intensive and New Zealand growers work hard to grow the best produce in the world. Producing the best fruits and vegetables means long hours, many workers, loud noise (frost fans, bird scarers, motor bikes etc) and sometimes chemical sprays. These effects are acceptable within a rural environment and Plan provisions generally provide for them. Unfortunately, reverse sensitivity issues arise when urban dwellers expect a different level of amenity to what they experience when living on the urban-rural interface. This is a result of both inappropriate development and the interface not being managed appropriately. 38/17
- It should be noted that the Central Otago climate with cold winters means that chemical sprays can sometimes be avoided, as bugs and disease are killed in heavy frosts and long cold winters. 38/18
- Of concern is that no noise assessment has provided with the PC14 application to determine the reverse sensitivity effect of the proposed mitigations on orcharding activities on nearby land. HortNZ are of the 38/19

view that appropriate reverse sensitivity mitigation should be provided within the urban land being developed, and not within productive rural land. However, some noise effects will not be able to be mitigated through development design or amenity planting. Development would therefore lead to restrictions on existing orcharding in the area if the plan change was approved.

Significance of productive land

- Across New Zealand land has been developed for housing, to the detriment of viable horticultural operations. This issue has been identified by Minister David Parker, Minister for the Environment. The Our land 2018 report[3], released by the Ministry for the Environment and Stats NZ confirms the need for more action to improve land management. This report on the state of the country's land has highlighted the impact of urban sprawl. The report acknowledges that fragmentation can also be a pressure on urban fringes: in 2013, lifestyle blocks occupied 10 percent of New Zealand's most versatile land and that this may block future options for agricultural production. 38/20
- To prevent the loss of more of New Zealand's' productive land and to promote its sustainable management, the Ministry for Primary Industries and the Minister for the Environment proposed the National Policy Statement for Highly Productive Land (NPS-HPL) in October 2019. Submissions were invited. 38/21
- The overall purpose of the proposed NPS-HPL is to improve the way highly-productive land is managed under the Resource Management Act 1991 (RMA) to: 38/22
  - recognise the full range of values and benefits associated with its use for primary production
  - maintain its availability for primary production for future generations
  - protect it from inappropriate subdivision, use, and development.

- The proposed NPS-HPL recognises that there are other factors in addition to soil quality that determine the productive capacity of land for primary production. While most local authorities define highly productive land based on the Land Use Capability Classification (typically LUC 1-3), there are other types of land that can be highly productive. These may include land types that are important for viticulture or stone fruit production. The proposed NPS includes requirement for local authorities to identify highly productive land based on a set of defined criteria (Soil Capability, climate, water availability, and area of land), as well as discretionary criteria to allow for regionally specific land types to be protected.[4] 38/23
- HortNZ undertook a horticultural mapping exercise with growers at the request of Council in 2018. This has informed the Cromwell Masterplan. The PC14 site subject is within the mapped horticultural land area, and is also outside areas identified on the Cromwell Spatial Plan for rural lifestyle development. 38/24
- Furthermore, in considering the effects of PC14 on the soil resource, the following definitions need to be considered: 38/25
  - partly operative Otago Regional Policy Statement (ORPS) 1998 – *high class soils*
  - partly operative Otago Regional Policy Statement 2019 – *significant soils*
  - Central Otago District Plan (CODP) – *soil resource and high class soils*
- The PC14 section 32 assessment considers the definition of 'high class soil' in the ORPS 1998, but does not adequately consider the consideration of 'significant soil' in the Partially Operative RPS 2019. In addition, the assessment of the soil resource (PC14: Appendix L) uses criteria for high class soil that are inconsistent with determinants for 'high class soil' in Central Otago, based on the ORPS definition. Therefore, the s32 does not 38/26

adequately consider this matter.

- Horticulture in Central Otago is significant. Much of this significance is dependent on the use of natural resources in Central Otago for that production, of which soils are a part. Based on this significance, the productive soils in Central Otago should be classed as significant for primary production, regardless of whether they are Class I, II or IIIe. 38/27

Rural Character

- The Cromwell Master Plan seeks that development is consistent with rural character. The CODP seeks that development avoids, remedies or mitigates adverse effects on amenity values of the rural environment and sets out lot sizes for rural subdivision which is a key determinant for rural character. 38/28
- PC14 seeks considerably smaller lot sizes and would result in higher density with a different character to that provided for by the operative CODP. While the ME report (PC14: Appendix G) compares the proposed lot sizes with the Rural Residential Zones. The Shannon Farm area is clearly rural. 71% of the development will be 4000sqm or less. Increasing the density and enabling residential lifestyles development will impact the established rural character on PC14 site and within the surrounding environment. 38/29
- In addition, except where directly adjacent to the rural zone, the boundary setback distances proposed by PC14 are 6m in proposed RL1, 2, and 3 zones; and 10m in proposed RL4 and 5 zones. This is significantly reduced compared to the current 25m for the rural area side and rear yard, and 10m for Rural Residential. This will lead to more intensive development than currently exist within the Rural Resource Area and will adversely affect rural character. Consideration needs to be given to the complete rural context, not just the character within the application site, but also the impacts on the surrounding environment. The s32 assessment is 38/30

deficient in this regard. P14 will not maintain the rural character, nor amenity, of the Rural Resource Area as directed by the CODP

Conclusion

- PC14 will adversely affect the ability of the rural resource to be used for its intended purpose as set out in the Otago Regional Policy Statement and Central Otago District Plan, if approved. 38/31

HortNZ oppose PC 14 – Shannon Farm for the reasons outlined above and for following reasons:

- PC14 does not meet the sustainable management purpose or principles of the RMA. 38/32
- The terminology of the proposed provisions of PC14 are not in accordance with the New Zealand Planning Standards; specifically, Standard 8 – Zone Framework Standard. 38/33
- PC14 does not give effect to the relevant Objectives and Policies of the operative Otago Regional Policy Statement 1998; in particular – Objectives 5.4.1, 5.4.2 and 9.4.3 and supporting Policies 5.5.2, 5.5.3 and 5.5.4. 38/34
- PC14 does not give effect to the relevant Objectives and Policies of the partially operative Otago Regional Policy Statement 2019; in particular – Objectives 3.2, 4.5 and 5.3 supporting Policies 3.2.17, 3.2.18, 4.5.1, 4.5.3 and 5.3.1. 38/35
- PC14 is contrary to the relevant Objectives and Policies of the Central Otago District Plan; in particular – Objectives 4.3.1, 4.3.7 and 4.3.9, and supporting Policies 4.4.2, 4.4.6, 4.4.8, 4.4.9 and 4.4.10. 38/36
- The supporting documentation for PC14 did not include a noise assessment to assess the reverse sensitivity impacts on the summerfruit industry that will be created by the proposal. 38/37
- The soil assessment does not address the issue of significant soils as identified in the ORPS (2019) Policy 3.2.17, nor address the fact that significant soils also 38/38

include the degree of significance to primary production.

- The assessment of environmental effects does not adequately assess the actual and potential reverse sensitivity effects on horticulture and fails to adequately assess the environmental, economic and social impact on significant horticultural operations as a result of the proposal. 38/39
- PC14 is inconsistent with the Cromwell Master Plan, specifically Objective 7. While the focus of the Master Plan is generally of the Cromwell Township, the wider environs and rural environment are also addressed. The PC14 site is not identified in the Spatial Plan for rural lifestyle development. This location is inappropriate and would be to the detriment of the established Summerfruit Industry. 38/40

The timing of notification significantly disadvantaged Summerfruit growers, as this was during their busiest time of year. HortNZ will therefore work with levy payers to enable their right to speak to the HortNZ submission at the hearing if they wish to do so 38/41

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1. https://www.hortnz.co.nz/about-us/product-groups/
2 Horticulture New Zealand. (2017). *New Zealand domestic vegetable production: the growing story*. http://www.hortnz.co.nz/assets/Media-Release-Photos/HortNZ-Report-Final-A4-Single-Pages.pdf
3. https://www.mfe.govt.nz/sites/default/files/media/Environmental%20reporting/Our-land-2018-at-a-glance-final.pdf
4. https://www.mpi.govt.nz/dmsdocument/37065-proposed-national-policy-statement-for-highly-productive-land-cabinet-paper

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39.	Helen Elizabeth Hucklebridge	**Support** Allowing PC 14 to proceed would be beneficial to Cromwell.	39/1	Approve Plan Change 14 in its entirety.

Further Submitter
117 James Dicey

117/7 James Dicey
Oppose
Oppose submission 39 in its entirety. No reasoning proposed for the support in submission. Reject whole submission.

40.	Neville Hucklebridge	**Support** This subdivision will benefit the development of Cromwell.	40/1	Approve Plan Change 14.
Further Submitter **117 James Dicey**				**117/8 James Dicey** Oppose Oppose submission 40 in its entirety. No reasoning proposed for the support in submission. Reject whole submission.
41.	Gavin James Hurring	**Support** PC 14 supported as the submitter can see that the lack of rural residential housing market will be catered for in the future. This will be a natural expansion of proximity of the town, also the plan change creates a great development close to the town belt.	41/1	Approve Plan Change 14.
42.	David Godfrey Jenkins	**Support** There are no lifestyle blocks available now and there is a big shortage of sections. This development meets the needs not being provided for in current planned subdivisions. Provides a lot of employment for Cromwell District which in turn provides the need for supporting services.	42/1	Approve Plan Change 14 without amendment.
43.	Janice Elaine Johnson	**Support** PC 14 supported as it will create growth for the Cromwell area and provide more industry and employment with the added benefits to all residents.	43/1	Approve Plan Change 14.
44.	Ross Foster Johnson	**Support** PC 14 will create more employment and growth for the Cromwell area.	44/1	Approve Plan Change 14.

45. DJ Jones Family Trust and Suncrest Orchard Limited **Further Submitter** **117 James Dicey**	**<u>Oppose</u>** • The submission relates to PC 14 in its entirety. The submitter advises that specific comment on provisions of PC 14 are set out in Appendix 1 that has been omitted from the submission.	45/1	Decline Plan Change 14 in its entirety. OR
	<u>General Submission</u> • DJ Jones Family Trust owns orcharding properties in the Ripponvale area, some of which were established as early as 1981. These orchards consist predominantly of plantings of Cherries, but also includes plantings of Nectarines, Peaches, Apples, Pears and Plums. These plantings have been undertaken to utilise the unique micro climate and soil conditions and are currently managed by Suncrest Orchard Limited. Horticulture activities involve long hours, many workers, loud noise and sometimes agrichemical spraying. These are acceptable within the rural environment and the Plan provides for them.	45/2	If Plan Change 14 is not declined modify the provisions of Plan Change 14 to protect existing use rights and provide a one hundred metre buffer along the Plan Change's boundary to reduce their future complexity in undertaking ongoing orcharding activities on neighbouring land and a no complaints consent notice should be included on all titles created. **117/22 James Dicey** <u>Support</u> Support submission 45 in its entirety. Reverse sensitivity issues correctly identified (frost fans, spray drift, bird scarers). Support whole submission.
	• DJ Jones Family Trust and Suncrest Orchard Limited have serious concerns with the proposed plan change eroding the ability or orchardists to continue the lawful horticulture activities currently undertaken in the surrounding area and the precedent that this proposal would have on other orcharding areas surrounding the Cromwell township. Orchard areas around this location have a unique mix of local soil conditions, available water supply and an ideal microclimate that provides suitable winter chilling and dry summer conditions that are essential for summer fruit growing. There is a limited amount of land such as this, with appropriate local district zoning, available in the Cromwell basin.	45/3	
	• There is an inherent incompatibility between Horticultural activities and residential at any density.	45/4	
	• For these reasons DJ Jones Family Trust and Suncrest	45/5	

Orchard Limited oppose Plan Change 14 in its entirety.

Specific Reasons:

- Plan Change 14 fails to protect the existing rural activities being undertaken on orchard land and land suitable for additional orcharding activities from reverse sensitivity effects. 45/6
- The Plan Change 14 site is subject to non-residential noise sources which will subject residents to noise from multiple sources throughout the day and night at different times of year. This will result in poor amenity for residents. Specifically there are many frost fans in operation on surrounding orchards, which can be in operation from mid to late August through until January. These machines start automatically when the critical temperature is reached, usually around 0.5-1.0 degree Celsius. There are no normal operating hours for these machines, they can operate at any time day or night, depending on when the critical temperature is reached. Helicopters are also used at different times during the season to assist with frost fighting and to remove excess water from fruit after a rain event to prevent fruit from splitting. Other orchard machinery is operated on the site all year round along with bird scaring activities. When harvesting, up to 150 people can be present within an orchard, and these picking teams can generate significant noise also. 45/7
- It is inevitable that future residents would seek to limit their exposure to these effects by trying to reduce the noise generating activities of adjoining land through controls on land use activities. 45/8
- Horticultural spraying is subject to strict operating guidelines, which have specific setback from residential land and neighbour notification requirements. These guidelines are in The Hazardous Substances Regulations 2017, Approved Code of Practice; New Zealand Standard, NZS8409:2004 (or NZS8409:1999). There are various setbacks from residential activities 45/9

		depending on the type of spraying being undertaken as contained in the Code of Practice and Work Safe guidelines. However spraying regulations as contained in the code of practice are updated over time and have the potential to get a lot stricter (as they are in other parts of the world), which could increase the setback distances required from residential activities which may restrict the ability to manage existing horticultural crops. If residential is established on the Plan Change 14 site, this will limit neighbouring orchard's ability to spray their trees and affect their ability to produce quality fruit. • It is not clear what mechanics are promoted by Plan Change 14, whether or not covenants or consent notices might be employed in an effort to protect the ongoing viability of surrounding orcharding activities. Evidence from other locations demonstrates that no-complaints covenants are not overly effective. • DJ Jones Family Trust and Suncrest Orchard Limited are significant contributors to Cromwell and Central Otago District along with other orcharding businesses. Development of additional residential activities in such close proximity horticulture is entirely incompatible with the established activities within this Rural Zone.	45/10 45/11	
46.	Owen Jeffrey Joyce	**<u>Support</u>** The Shannon Farm development will become an important part of Cromwell's growth story. The rural lifestyle lots offer options that do not currently compete with existing subdivisions. This will add diversity to the growing Cromwell population whilst being situated close to all amenities. One further matter, the submitter understands that the neighbouring cherry orchard will be expanding into Shannon Farm and will support the community with growth and jobs across all sectors.	46/1	Approve Plan Change 14.

47.	Kimm Jamieson Family Trust	**Oppose** • The submitters who are direct neighbours to the PC 14 land are horticulturalists who grow and pack export cherries. • Provisions need to be made now and for the future, ensuring that both Town and Country can move forward with a clear understanding of the environment that the horticulture sector is growing and living in. This is necessary to ensure that New Zealand continues to reap the benefits of the horticultural sector. • Whilst the submitters land is zoned Rural and PC 14 provides for Rural Residential development, with the agreed criteria set in place now, peaceful living can be provided for in the future. • One major area that needs to be addressed is Reverse Sensitivity, and the need for a clear understanding of the day to day happenings in a rural horticultural environment such as spraying, mowing, bird scaring, fertiliser spreading, frost fighting (frost machines), helicopter activity for fruit drying and frost fighting – that can become everyday events along with many other activities. • The submitters would require a 100 metre building setback from all boundaries, and the Amenities plantings be carried out through the suggested 100m building setback. • The reasoning for the setback requirement is that internationally there seems to be a trend on spraying distances from Residential Dwellings, hence the planning for the possibility of these changes being introduced into the New Zealand RMA requirements. • The submitters as property owners appreciate that change is inevitable, change can be seen as a positive opportunity should it be managed correctly, it is about protection for now and in the future.	47/1 47/2 47/3 47/4 47/5 47/6 47/7	Approve Plan Change 14 with modifications such that a 100 metre building setback be provided from all boundaries; and the Amenities plantings be carried out through the suggested 100m building setbacks.

48.	Ricky Paul Larsen **LATE Submission received 20 December 2019**	**Support** This development fills a void of rural house blocks close to Cromwell. These sections will be highly sought after.	48/1	Approve Plan Change 14.
49.	Basil John Lister **Further Submitter** **145 Carl Michael McNulty**	**Support** PC 14, by proximity to town centre, complements the Master Plan. Provides for a range of residential options. Puts seasonal worker accommodation where it should be, and its associated costs. Provides public access to the suitable land component. Supports a move away from 4 ha blocks which are too big for residential and too small for being long term productive. Complies with the thrust of the Master Plan that future growth should be north and west of the town centre.	49/1	Approve Plan Change 14. **145/1 Carl Michael McNulty** Support Support submission 49 in its entirety. This is a logical and desirable location for such a development, the range of densities proposed is appropriate and well considered in terms of giving future owners various options and price points, plus allows efficient use of land and suitable mitigation of any visual impacts. The further submitter also supports the provision of public access to recreation tracks on the hill. In addition the developer is proposing to lower the ONL boundary to protect more sensitive landscape than is the present case. There are clear economic benefits to Cromwell from expansion of the cherry orchard by this well-established operator. There is a definite demand for product in the lifestyle block market which Shannon Farm can satisfy, giving buyers additional choice and in turn freeing up land within central Cromwell for more intensive affordable housing as owners of such sites relocate to areas like Shannon Farm. The establishment of lifestyle blocks close to Cromwell township is also much more desirable than having larger (eg. 8ha) sites developed in far more remote areas such as Queensberry with vastly

				higher costs associated with roading, servicing and commuting for owners. A development of this scale is far better than having numerous ad hoc infill lifestyle blocks to satisfy demand that lacks the capacity, resources and means of creating a considered 'master plan' for their natural environment. Allow the whole of submission 49.
50.	Andrew McDonald **Further Submitter 116.2 Cromwell Mountain Bike Club**	**<u>Conditionally Support</u>** We as a Club [Cromwell Mountain Bike Club (Cromtbc)] support PC 14 under the following circumstances: • The proposed recreation area be made available for mountain bike trail development by Cromtbc. • We aren't restricted to simply using existing trails on the land for mountain bike use. • Cromtbc is allowed the space to design and build multiple trails in the recreational area. • The trails built by Cromtbc will be accessible by anyone wishes to do so, not just Shannon Farm residents.	50/1	Approve with modifications ie. approve Plan Change 14 in its entirety including points raised in submission. **116.2/4 Cromwell Mountain Bike Club** Supports submission 50 in its entirety. The development of world class mountain bike trails in the proposed recreation zone will be a great asset for the community of Cromwell and Central Otago. The submission seeks that Cromwell Mountain Bike Club is allowed to build multiple trails in the recreational area. The appropriate mechanism to allow the building of trails is amendment to standard [Rule] 4.7.6L to provide that cutting of mountain bike trails and tracks, including associated earthworks, within the Outstanding Natural Landscape area as identified on the structure plan in Schedule 19.23 is a permitted or controlled activity, or a similar amendment with this effect. Allow submission.
51.	Neil Christopher MacDonald	**<u>Support</u>** Plan Change 14 will: 1. Increase the availability of larger land blocks for sale in the Cromwell region that will suit some prospective purchasers. 2. Corral these larger blocks in a manageable way rather than have houses scattered across the region. PC 14 is congruent with the purpose and principles of Part 2 of the RMA – it is a managed development. 3. Likely become an icon of Cromwell – a sought after	51/1 51/2 51/3	Approve Plan Change 14 in its entirety.

		place to live that will enhance the reputation of Cromwell.		
		4. Generate economic activity for many existing Cromwell residents and their businesses.	51/4	
		5. Add to the Central Otago District Council rating base.	51/5	
		6. Provide access to some superb elevated country for recreational purposes.	51/6	
52.	Andrew Grant McFarlane	**Oppose** The specific provisions of PC 14 that the submission relates to are:		Decline Plan Change 14.
		• Allowing quality horticultural land to be used for small lifestyle blocks.	52/1	
		• Sensitivity issues arising from such development in close proximity to horticultural activity.	52/2	
		• Detrimental visual aspects to the Cromwell basin.	52/3	
		(1) Use of Horticultural Land		
		• In this day and age there is an increasing awareness of the need to preserve areas suitable for growing food as this land is limited. A large percentage of the land under consideration for development is of a quality and gradient suitable for horticulture and should be used as such.	52/4	
		(2) Sensitivity Issues		
		• Allowing residential development in close proximity to orchards will lead to conflict. Normal operations of cherry orchards in particular may involve the use of bird scaring boomers, shot guns, wind machines and sprayers of the air blast type. These are not compatible with housing developments. Because of (1) above and the fact that orcharding is an existing use of the area residential development should be declined.	52/5	

		(3) Visual Aspects to the Cromwell Basin • One only has to see the effect the "Schooner Development" has had on the Cromwell basin outlook to envisage what the hillside will become. A main part of Cromwell's attraction is the landforms that surround it. We should seek to preserve them and concentrate housing development in the urban area in line with the Council's own Master Plan for Cromwell. • The submitter would not be averse to the land subject to PC 14 being split up into horticultural blocks provided they are of a useful size.	52/6 52/7	
53.	Peter John McGrath	**Support** It makes good use of the land and provides more housing space near to Cromwell's main urban area. The submitter likes the idea of smaller rural lots as the current rural minimum of 8 ha is a waste of land in his opinion, especially with the way the town is growing so fast. A selection of new rural lots will fit very well into this part of town.	53/1	Approve Plan Change 14.
54.	Amber Lee McNulty	**Support** Development in this area is going to happen regardless. At least this, in the submitter's opinion, is a well considered proposal.	54/1	Approve Plan Change 14.
55.	Carl Michael McNulty	**Conditionally Support** While PC 14 supported it would be good to have the section of the road down to the state highway either widened or resealed with new camber.	55/1	Approve Plan Change 14 conditional on a review of the sealing of Ripponvale Road [to SH 6].
56.	Edwin Charles Mallett	**Support** The proposal gives residents of Cromwell more diversity in regard to housing options and provides a wide range of lifestyle block sizes from 2000m^2 to in excess of 3 ha.	56/1	Approve Plan Change 14 in its entirety.

57.	Nathan Manning	**Support** This is a well planned and thought out development that would suit the wants and needs of the community in Cromwell.	57/1	Approve Plan Change 14.
58.	Mark Mason	**Support** PC 14 adds significant economic benefit to the area balanced with some care for the surrounding rural aspects, ie. a green belt.	58/1	Approve Plan Change 14.
59.	Aaron Matheson	**Support** PC 14 allows for ongoing productive use of land and a mix of orchard horticulture and home production for private use.	59/1	Approve Plan Change 14 in its entirety.
60.	Peter John Mead & Alistair David Stark as Trustees for the McKay Family Trust **Further Submitter** **117 James Dicey**	**Oppose** • The submission opposes all aspects of the proposal. • The McKay Family Trust owns a 20 hectare block of rural land at the northern side of the junction of SH 6 and Sandflat Road. The property is not simply a lifestyle block but is a fully functioning orchard comprising 8 hectares of sweet cherry, with about 11ha of very suitable land for orchard expansion. The house on the property is orientated to the north and a large part of PC 14 land forms part of the view. • The effect of the plan change will be to put approximately 168 new residential homes in what is now a rural area. The same issues regarding reverse sensitivity with noise and spray drift that were submitted on in PC 13 will arise with PC 14. There will be an inevitable conflict which will dramatically affect the ability of orchards to continue their normal day to day activities. The current issues at Letts Gully near Alexandra serve as an example of what will happen. • The proposal appears to be in conflict with the Cromwell Masterplan.	60/1 60/2 60/3 60/4	Decline Plan Change 14 in its entirety. **117/27 James Dicey** Support Support submission 60 in its entirety. Reverse sensitivity issues correctly identified (as per PC 13), Visual amenity will be compromised, Conflicts with Cromwell Masterplan, compromises SAL area. Support whole submission.

• The transportation assessment appears deficient as it does not consider the effect of an additional 900 vehicle movements a day when an event is being held at Cromwell racecourse. On for example a race day there is a very large number of cars going both ways for much of the day. The submitter considers the turnoff at the racecourse will be less safe and feels traffic experts should be asked to consider this. There should be some safety improvements made by the proponent.	60/5
• Currently the house on the submitters' property enjoys an unrestricted rural view. There are two prominent features in their view namely the mountain backdrop of the Pisa Range and the SAL area in the East Gully on the subject property. They enjoy this view considerably and believe it to be special and gives them a real flavour of Central Otago and home. The submitters contemplated including photos of the view however judging by the views shown in the landscape report photos do not do the view justice. The photos make it look distant which it is not. The submitters' preference is to have the report writers and those who adjudicate on the matter come to their home and take in the view. They will see what the submitters refer to. The proponent wants to establish houses, roads and vegetation on this SAL area. That will significantly alter and ruin the submitters' outlook during the day and at night with lights. Their rural outlook will become more urbanised.	60/6
• The submitters' amenity will be significantly altered and instead of having a truly Central Otago landscape they will have hill scars, vegetation, houses, roads and lights at night. One needs only to look at the development by Schooner Developers on Ripponvale Road as an example of the effect.	60/7
• SAL areas are there for a reason. No development should be allowed which detracts from our landscape amenity.	60/8

61.	Bevan Meiklejohn **Further Submitter** **116.2 Cromwell Mountain Bike Club**	**<u>Conditionally Support</u>** We as a Club [Cromwell Mountain Bike Club (Cromtbc)] support PC 14 under the following circumstances: • The proposed recreation area be made available for mountain bike trail development by Cromtbc. • We aren't restricted to simply using existing trails on the land for mountain bike use. • Cromtbc is allowed the space to design and build multiple trails in the recreational area. • The trails built by Cromtbc will be accessible by anyone wishes to do so, not just Shannon Farm residents.	61/1	Approve with modifications ie. approve Plan Change 14 in its entirety including points raised in submission. **116.2/5 Cromwell Mountain Bike Club** <u>Support</u> Supports submission 61 in its entirety. The development of world class mountain bike trails in the proposed recreation zone will be a great asset for the community of Cromwell and Central Otago. The submission seeks that Cromwell Mountain Bike Club is allowed to build multiple trails in the recreational area. The appropriate mechanism to allow the building of trails is amendment to standard [Rule] 4.7.6L to provide that cutting of mountain bike trails and tracks, including associated earthworks, within the Outstanding Natural Landscape area as identified on the structure plan in Schedule 19.23 is a permitted or controlled activity, or a similar amendment with this effect. Allow submission.
62.	Andrew Menzies **Further Submitters** **116.2 Cromwell Mountain Bike Club** **147.2 Andrew Menzies**	**<u>Support</u>** The Shannon Farm development will have quality, well built homes. The recreational area above to be offered as a mountain bike access overseen by Cromwell Mountain Bike Club.	62/1	Approve Plan Change 14. **116.2/6 Cromwell Mountain Bike Club** <u>Support</u> Supports submission 62 in its entirety. The development of world class mountain bike trails in the proposed recreation zone will be a great asset for the community of Cromwell and Central Otago. The submission seeks that Cromwell Mountain Bike Club is allowed to build multiple trails in the recreational area. The appropriate mechanism to allow the building of trails is amendment to standard [Rule] 4.7.6L to provide that

				cutting of mountain bike trails and tracks, including associated earthworks, within the Outstanding Natural Landscape area as identified on the structure plan in Schedule 19.23 is a permitted or controlled activity, or a similar amendment with this effect. Allow submission. **147.2/1 Andrew Menzies** <u>Support</u> Support submission 62 in its entirety. Cromwell Mountain Bike Club be given full access to recreational area designated to build world class trails network to benefit the local community and business. Allow whole of submission 62.
63.	Jonathan Warren Milne	**<u>Support</u>** PC 14 supports economic growth and employment opportunities for development and building sections and gives Cromwell residents more diversity in regard to housing options and provides a wide range of lifestyle block sizes.	63/1	Approve Plan Change 14 in its entirety.
64.	Werner Murray **Further Submitter** **117 James Dicey**	**<u>Oppose</u>** • The submission relates to Plan Change 14 in its entirety. • 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 the submission below will demonstrate how out of step and inappropriate the proposal is with the locality, that the objectives put forward cannot meet part 2 of the RMA <u>Zoning</u> • A residential subdivision of allowing for a minimum lot	64/1 64/2 64/3	Decline Plan Change 14 in its entirety. PC 14 does not meet the purpose of the RMA. **117/28 James Dicey** <u>Support</u> Support submission 64 in its entirety. Correctly identifies that PC 14 pre-empts the district planning process, compromises Masterplan, correctly identifies that there is plenty of RRA land suitable for lifestyle development and PC 14 is not needed in this regard, no LUC classification has been undertaken on the soils subject to PC 14, full impact of PC 14 on public infrastructure (waste, water etc) has not been calculated and may act as a tipping point which may not be fully funded, Light emission particularly on a hill slope above the valley floor has not been considered. Support whole submission.

size of 2,000m², in the Rural Resource area, disguised under the name of "rural residential" land is not an efficient use of Highly Productive Land. 64/4

- The CODC District Plan is not like other district plans where the Rural Residential zone/resource area, is a separate zone. In the CODC Plan the Rural Residential zone is a subset of the Rural Resource Area. Minimum lot sizes in this resource area are large enough for these lots to still have a productive use. For instance, areas around Ripponvale Road, and Pearson Road are some of the most productive cherry growing areas in the basin and is zoned Rural Residential. 64/5

The application states that the proposal is for rural zoning:

Regardless of whether Cromwell itself is an "urban environment", the current and proposed zoning of the application site is rural.

Within the context of the CODC plan Rural Area means all that area of the District that is not urban area. Chapter 4 of this district plan states the following (underlined for emphasis):

The Rural Resource Area comprises the rural environment of the District. This area has been identified as distinct from the urban areas of the District on the basis of its environmental character. The amenity values of the rural environment are dominated by Central Otago's unique, semi-arid landscape of broad basins separated by low mountain ranges with sparse vegetation, covered in tussock grassland and exotic pasture, and broken by schist rock outcrops. This landscape retains a high natural character and has significant scenic values and some of it is identified in this District Plan as an outstanding natural landscape or outstanding natural feature. These values can be enhanced by human made elements which ***include orchards and vineyards; homesteads accompanied by stands of trees***

(often poplars); remnant stone cottages; small irrigation and stock water dams and water races; energy generation facilities; and shelter belts of trees. Former mining sites also give the District a distinctive character. *For many people it is the reason they reside and recreate here, and that became particularly apparent during the community consultation phase of the Rural Study which was carried out in 2005 and 2006. Activities that locate within the rural environment do so generally for one of four reasons.*

(i) They are ***reliant upon the resources of the rural area.*** *For example, farming activities need large areas of open land, while horticulture and viticulture activities need particular soil types in combination with a number of other factors, particularly climatic conditions and irrigation.*

(ii) *They need to be* ***close to an activity that is reliant upon the resources of the area****. For example, a pack house or a juice factory needs to locate near the fruit source and a winery/wine making facility needs to locate near the grape source.*

(iii) *They* ***need a large open space where they can generate effects without significantly affecting more sensitive activities****. For example, an abattoir which generates discharges (including odour) or a transport yard which generates high levels of traffic.*

(iv) *Persons wish to enjoy the lifestyle opportunities offered by its open space, landscape and natural character amenity values.*

(v) ***They need to locate directly adjacent to the resource.*** *For example, mineral extraction and related activities do not have the ability to locate anywhere other than directly adjacent to where the deposit occurs. The provisions of Section 4 apply within the area shown as Rural Resource Area on the planning maps.*

- The proposal is for lots as small as 2000m². In accordance with the reasons for activities locating to the Rural Resource Area above, the proposal does not meet these. The debate around reliance upon the resources of the rural area as a reason to locate to the rural area is a long one. In a nutshell there is no need for a 2000m² site to locate to the Rural Resource Area as there is no reliance on the resource. In fact 2000m² sites and the uses that can occur on those sites are readily available in the Residential Resource Areas (RRA). For instance RRA(4). 64/6

The Residential Resource Area 4 states: 64/7

The area is capable of accommodating low density residential development in a manner that provides privacy for the occupiers of dwelling houses and maintains the rural character of Bannockburn.

There is plenty of land that has zoning capable of accommodating 2000m² sites without classifying them as ***"rural residential"*** in order to have this type of development approved in the Rural Resource Area. Further RRA(2), RRA(6), and RRA(7) also refer to residential lots having rural amenity.

Categories of development in the Residential Resource Area and minimum lot sizes:

Residential Resource Areas		Residential Resource Areas that allows for rural amenity	
RRA(1)	3000m^2	RRA(2)	4000m^2
RRA(3)	1000m^2	RRA(4)	1500m^2
RRA(5)	3000m^2	RRA(6)	4000m^2
RRA(8)	1500m^2	RRA(7)	1ha
RRA(9)	6000m^2		
RRA(10)	800m^2		
RRA(11)	400m^2		
RRA(12)	500-1000m^2		
RRA(13)	600-1000m^2		

Table 1: Existing Residential resource areas and minimum lot sizes

- The appropriate policy test for this proposed plan private plan change is as converting rural land to urban residential land in a receiving environment completely surrounded by rural development. 64/8
- 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 the Cromwell Basin will be significant. As such it is the submitter's view that the purpose of the Act cannot be met should the proposed plan change go ahead. 64/9
- Due to the location, and scale of the proposal, effects generated by the proposal cannot be remedied or mitigated and therefore the proposed uses should be avoided and the Plan Change should be declined. 64/10

<u>Sound Resource Management Practice</u>

- Further given that the CODC are currently going through a plan change process it is my view that the plan change should be rejected on the grounds that he request or part of the request is not in accordance with sound resource management practice. An example of this is that the Queenstown airport started on a private plan change process but given that the QLDC were going 64/11

through a Council led plan change they opted to abandon the private plan change process in favour of the Council led plan change process due to the difficulties around running two processes in tandem. As such the private plan change was abandoned as the sound resource management practice was to run one process at a time.

Urban Development Bill

- Not addressed. 64/12

Highly Productive Land

- This has been attempted to be addressed through an assessment on productive soils. As the NPS for Highly Productive Land indicates the assessment of the loss of productive land is far more comprehensive. Given that the proposal is located in a very well established horticultural area the assessment undertaken as part of this proposal does not assess these effects noting the requirements under Schedule 1 that any information required by this schedule, must be specified in sufficient **detail** to satisfy the purpose for which it is required. 64/13
- There is no assessment around how the residential uses within the site might respond to the reverse sensitivity on the site. 64/14

Efficient, co-ordinated, integrated greenfields development

- While co-ordinated and efficient green-fields 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. 64/15
  - Plan Change 14 is not a logical progression for residential development (noting that rural residential development has been applied for) 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. Further it is not in accordance with the Cromwell Master Plan,
- Successful development needs to be supported by infrastructure which is not present.

Diversity of housing product, economies of scale and housing affordability

64/16

- Increased density does not mean affordable housing on its own.

Public Infrastructure

64/17

- 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 the submitter adds:
  - 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.

G6.1 – Compatibility with surrounding activities

64/18

- 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 the 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 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.	64/19
		• 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.	64/20
		• Reverse sensitivity from agricultural sprays on residential activities have not been adequately addressed.	64/21
		• 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.	64/22
		<u>Other Matters</u>	
		• Excess light emission is an issue in our district – this has not been addressed.	64/23
		• Trails and public access are a positive effect of the development.	64/24
65.	NZ Transport Agency	**<u>Oppose</u>** • The submission relates to Plan Change 14 in its entirety.	65/1
Further Submitters **117 James Dicey** **130 Horticulture New Zealand** **155 Public Health South** **171.3 Kate & Rob Wardle**		<u>General Comment</u> The NZ Transport Agency understands that Proposed Plan Change 14 seeks to rezone 142 hectares of land from Rural Resource Area to Rural Resource Area (5) to accommodate approximately 160 rural lifestyle properties near the Cromwell Town Centre. The NZ Transport Agency notes that the scale and intensity of rural lifestyle development proposed by Plan Change 14 (minimum lot sizes 2000m^2 to 3 hectares) is not accommodated under the existing	65/2

Decline Plan Change 14 in its entirety.
117/29 James Dicey <u>Support</u> Support submission 65 in its entirety. Significant impact on traffic, roading and intersections, PC 14 compromises spatial framework and transport infrastructure in and around Cromwell, precedent effect of PC 14. Support whole submission.

provisions of the Rural Resource Area of the Central Otago District Plan (District Plan).

There are a number of objectives and policies in the District Plan that are relevant to Plan Change 14. The District Plan seeks to manage urban growth and the effects of development on the transportation network, other supporting infrastructure and Rural Resource Area via a number of sections in the District Plan, in particular Sections 4 (Rural Resource Area), 6 (Urban Areas) and 12 (District Wide Rules and Performance Standards). The management of subdivision effects on the roading network, other infrastructure and utilities are addressed as part of Section 16 (Subdivision). A key objective is to ensure that subdivision avoids, remedies or mitigates adverse effects on the safe and efficient operation of the roading network. 65/3

The objectives and policies in Section 13 (Infrastructure, Energy and Utilities) of the District Plan are also particularly relevant to the NZ Transport Agency in their consideration of the development proposed by Plan Change 14. These objectives and policies identify the need to enable the safe and efficient operation and development of the transportation network; and recognise the essential and positive contribution that infrastructure and it's ongoing development makes to the District's social, economic, and cultural wellbeing. 65/4

SH6 in this location is defined in the One Network Road Classification as a Regional Route. These roads are identified as making a major contribution to the social and economic wellbeing of a region and connect regionally significant places, industries, ports and airports. They are major connectors between regions and, in urban areas may have substantial passenger transport movement. The value and importance of State Highway 6 (SH6) in the proximity of the site is obvious in this context. It connects Central Otago to adjacent regions and connects Cromwell to Wanaka and Queenstown and other areas in Central Otago as well as to and Wanaka and Queenstown airports. 65/5

SH6 in this location is also a Limited Access Road (LAR). 65/6

130/5 Horticulture New Zealand

Support

Support submission (65/1-65/18) in its entirety. An efficient transport network is important to the success and functioning of the horticulture industry. Accept decision sought to decline plan change.

155/4 Public Health South

Support

Supports submission point 65/8 in its entirety. Public Health South supports safe active and public transport, and community connectedness. Public Health South strongly advocates for and encourages individuals and their communities to be active, including active transport networks. Providing safe transport choices and creating a shift in transport behaviours towards public and active transport has positive benefits for health, the environment, and the community. This occurs through increased physical activity to get to/from public transport, improved air quality and fewer greenhouse gas emissions, as well as improved road safety.[4]

Reducing the reliance on individual car use and reducing road congestion must be a priority to ensure liveability is retained as the district grows. Ultimately, decreasing traffic will increase safety – particularly in the current community where infrastructure is dominated by cars.

Further, the opportunity for safe and efficient pedestrian/cycle access into the Cromwell Town Centre will increase community connectedness.

Incorporate relative provisions into the plan; acknowledge the need for safe public and active transport.

[4] Goodin, H. Evidence Snapshot. Promoting Physical Activity at the Local Government Level. Agencies for Nutrition Action, p 4, 2015. http://www.healthyaucklandtogether.org.nz/assets/Uploads/ana-evidencesnapshot.pdf (accessed Feb 3, 2020)

LAR's are created in the interest of road user safety and limit properties access to the highway to authorised crossing places.

NZ Transport Agency's Interest in Plan Change 14

The area affected by Plan Change 14 adjoins Ripponvale Road which meets SH6 at two existing intersections. The area affected by Plan Change 14 is also located on Rural Resource Area zoned land on the opposite side of SH6 to the Cromwell Town Centre. The NZ Transport Agency therefore has an interest in this Plan Change, as it introduces the potential for impacts on the safety and the efficiency of the State highway network. 65/7

The minimum lot sizes proposed as part of the Plan Change (2000m2 to 3 hectares) will essentially generate residential activities within the Rural Resource Area. It will increase traffic volumes entering / exiting SH6 and would require the appropriate safe systems upgrades to intersections with SH6 (Ripponvale Road and Ord Road). Also given the proximity of the Plan Change area to Cromwell and the residential nature of the development there is potential for pedestrians and cyclists wanting to cross SH6 to the Cromwell Township. Therefore further consideration of the provision of safe and efficient pedestrian / cycle access across SH6 to the Cromwell Town Centre is required. 65/8

Demand for Growth Within Cromwell

The NZ Transport Agency recognises that there is significant demand for growth within the Cromwell area with a range of areas being considered for rezoning and development. In this regard, the NZ Transport Agency supports the Cromwell 'Eye to the Future' Spatial Framework document (29 May 2019) which aims to address Cromwell's future growth pressures as to the shape, form and function of development over the next 30 years. The guiding principles and objectives of the Spatial Plan highlight the need to consolidate urban development within Cromwell and to carefully manage greenfield development. 65/9

171.3/1 Kate & Rob Wardle

Support

Support submission 65 in its entirety. This plan change would effectively create a suburban hub within an existing horticultural area with no provision to facilitate walking, biking or taking public transport to Cromwell. Having to cross a fast and busy SH 6 to get to Cromwell schools and shops will put off most people. New residential developments must have sustainable low carbon transport at the forefront of their planning. This submission explains the issues. Allow submission 65 in full.

It identifies the importance of retaining the productive rural environment and rural character, and the need to clearly demarcate between rural and urban boundaries. The Spatial Plan makes references to improving opportunities for walking and cycling access, creating greater linkages with key nodes or services and facilities within Cromwell. It is noted that the Spatial Plan does not include any changes to the current rural zoning of the land subject to Plan Change 14. The NZ Transport Agency understands that while the Cromwell Spatial Plan is a non-statutory document the intention is for it to be implemented through future changes to the District Plan.

Section 32 Analysis

The Section 32 analysis seeks to rely on existing objectives in the District Plan, however it does not assess the proposal against the objectives and policies within Section 13 of the District Plan. As a result the Section 32 analysis treats the proposal as a standalone development and does not consider the cumulative effects of this type of development on the wider transportation network in the district. 65/10

Reasons for Opposing Plan Change 14

The NZ Transport Agency's reasons for opposing Plan Change 14 are that it is inconsistent with the general direction set out in the District Plan and Cromwell's Spatial Plan for the following reasons:

The subject land is on rural zoned land (Rural Resource Area under the District Plan) located outside of the areas identified for future growth in the Spatial Plan and on the opposite side of SH6 to the Cromwell Town Centre. The land subject to the Plan Change is not provided for under the existing provisions of the District Plan or included as part of the Spatial Framework for the area. If rezoned the area will become a remote satellite residential enclave primarily reliant on private vehicles to travel. 65/11

Proposed Plan Change 14 seeks to accommodate rural lifestyle activities on land zoned Rural Resource Area near 65/12

SH6 on the outskirts of Cromwell. The NZ Transport Agency notes that Plan Change 13 also seeks urban / residential development opportunities for rural zoned land adjoining SH6 beyond the current urban extent of Cromwell Township. These ad-hoc plan changes are a piecemeal approach to rezoning land and does not allow the NZ Transport Agency to comprehensively address the effects of rezoning applications on the State highway and the wider transport network.	
The minimum lot sizes proposed as part of Plan Change 14 (2000m^2 to 3 hectares) will essentially generate residential type activities within a rural area. It will increase traffic volumes entering / exiting the SH6 and will require significant traffic management solutions to address safety concerns. This would require appropriate upgrading to intersections (Ripponvale Road, Ord Road) and providing safe pedestrian / cycle access from the affected area across SH6 to the Cromwell Town Centre. The NZ Transport Agency do not consider that these matters to have been sufficiently addressed within Plan Change 14.	65/13
Adopting a Plan Change of this nature can lead to a precedence for other rural lifestyle or residential development applications to be approved outside of the District Plan and Spatial Plan for the area. This piecemeal approach has the potential for unanticipated effects and infrastructure upgrades on the surrounding State highway network. The NZ Transport Agency operates under a large planning window (up to 30 years) given the overall capital investment in maintaining and upgrading the State highway network. The NZ Transport Agency's ability of planning infrastructure for the future is compromised by developments occurring outside areas anticipated by District Plans.	65/14
The objectives and policies in Section 4: Rural Resource Area, Section 6: Urban Areas and Section 13: Infrastructure, Energy and Utilities and Cromwell's Spatial Plan are not sufficiently recognised or provided for in Proposed Plan Change 14.	65/15

	The NZ Transport Agency therefore oppose Proposed Plan Change 14 in its entirety for the reasons stated above.	65/16	
	<u>The reasons for this submission are</u> The Transport Agency's statutory objective is to carry out its functions in a way that contributes to an effective, efficient, and safe land transport system in the public interest. Some of these functions relevant in this case are: • to promote an effective, efficient, and safe land transport system; • to manage the State highway system in accordance with the relevant legislation; and • to assist, advise, and co-operate with approved organisations (such as regional councils and territorial authorities).	65/17	
	In submitting on this Plan Change, the NZ Transport Agency is pursuing these statutory functions and objectives in relation to the land transport system, and the State highway systems.	65/18	
66. Kalle Oliver **Further Submitter 116.2 Cromwell Mountain Bike Club**	**<u>Conditionally Support</u>** We as a Club [Cromwell Mountain Bike Club (Cromtbc)] support PC 14 under the following circumstances: • The proposed recreation area be made available for mountain bike trail development by Cromtbc. • We aren't restricted to simply using existing trails on the land for mountain bike use. • Cromtbc is allowed the space to design and build multiple trails in the recreational area. • The trails built by Cromtbc will be accessible by anyone wishes to do so, not just Shannon Farm residents.	66/1	Approve with modifications ie. approve Plan Change 14 in its entirety including points raised in submission. **116.2/7 Cromwell Mountain Bike Club** <u>Support</u> Supports submission 66 in its entirety. The development of world class mountain bike trails in the proposed recreation zone will be a great asset for the community of Cromwell and Central Otago. The submission seeks that Cromwell Mountain Bike Club is allowed to build multiple trails in the recreational area. The appropriate mechanism to allow the building of trails is amendment to standard [Rule] 4.7.6L to provide that cutting of mountain bike trails and tracks, including associated earthworks, within the Outstanding Natural

				Landscape area as identified on the structure plan in Schedule 19.23 is a permitted or controlled activity, or a similar amendment with this effect. Allow submission.
67.	Otago Regional Council **Further Submitters** **117 James Dicey** **130 Horticulture New Zealand** **149 NZ Transport Agency** **155 Public Health South**	**Neither Support nor Oppose** • The specific provisions of PC 14 that this submission relates to are: - Air Quality - Reverse Sensitivity - Density - Transportation 1. Proposed Regional Policy Statement • A review of Otago's Regional Policy Statement (RPS) has been undertaken and due to an appeal, the result is Otago currently requires currently has two RPS partially operative, the 1998 and 2019 RPSs. Central Otago District Council's (CODC) decision must have regard to whether the PC14: Shannon Farm gives effect to the relevant provisions of *both* RPSs. Central Otago District Council's (CODC) decision must have regard to whether the PC14: Shannon Farm gives effect to the relevant provisions of *both* RPSs. 2. Air Quality • Cromwell is within gazetted Airshed 1, which is considered "polluted" by the Ministry for the Environment. On average, Cromwell residents experience over 30 days during winter where pollution levels breach the national standard. The highest daily levels are routinely over 100µ0g/m^3, twice the allowable daily limit set in the National Environmental Standard for Air Quality (NESAQ) limits for particulate matter (PM^{10}). A major source of these particulates is emissions from solid-fuel home heating appliances.	67/1	**117/30 James Dicey** Support Support submission 66 [sic – 67] in its entirety. Air quality impacts due to spray drift correctly identified, impact on drinking water (lack of infrastructure). Support whole submission. **130/6 Horticulture New Zealand** Support Support submission (67/1 – 67/20) in its entirety. Appropriate consideration of Regional Policy and matters raised is required. **149/1 NZ Transport Agency** Support Submission points 67/2, 67/11, 67/13, 67/14, 67/15, 67/15 [sic – 67/16], 67/17, 67/18, 67/19 & 67/20 are supported. Appropriate consideration of Regional Policy and matters raised in the Otago Southland Regional Land Transport Plan 2015 – 2021. **155/5 Public Health South** Support Supports submission points 67/2 – 67/5 in their entirety. Public Health South supports the acknowledgement of access to environments that have safe air quality. Allow submission and acknowledge the relevant provisions into the plan.

Cromwell has some of the most degraded winter air quality in the region.

- ORC does not agree with the Plan Change request document, section E2.3 which states the Regional Plan: Air for Otago (the air plan) is "not of particular relevance to this plan change request…"
  Proposed RPS Policy 3.1.6 (which has full legal effect as it was not appealed) requires:
  "Manage air quality to achieve the following:
  a) Maintain good ambient air quality that supports human health, or enhance air quality where is has been degraded; and
  b) Maintain or enhance amenity values."
  RPS (2019) Policy 4.5.1 states '*Providing for Urban Growth and Development'* requires under provision i) (ii):
  "..the use of low or no emission heating systems where ambient air quality is:
  ..(ii) vulnerable to degradation given the local climatic and geographical context"
  Under the air plan, the proposed plan change would be classified Air Zone 3. Policy 9.1.3(a) of the air plan requires all new heating appliances on properties in Air Zone 3 less than 2 hectares in size to meet stringent emission and thermal efficiency standards.
  Air Plan Policy 9.1.4 promotes "*clean heating in new residential areas where discharges are likely to have an adverse effect on air quality in Air Zones 1 or 2, or degrade ambient air quality*".
  The proposed development is near Cromwell's Air Zone 1 in the air plan and use of solid fuel heating systems could exacerbate ambient air quality, both within the new development and the existing urban area. 67/3
- **ORC requests** If CODC was to recommend granting the plan change, it require the use of low or no emission heating systems within the PC14 area. 67/4
- **ORC requests** that CODC promote the use of low emission communal heating systems as developments 67/5

155/6 Public Health South
Support
Supports submission points 67/6 & 67/7 in their entirety. Public Health South supports the acknowledgement of reverse sensitivity from neighbouring horticultural business activities and recognises this as a public health issue. Allow submission and acknowledge the relevant provisions into the plan.

155/7 Public Health South
Support
Supports submission points 67/17 – 67/20 in their entirety. Public Health South supports safe active and public transport, and community connectedness. Allow submission and acknowledge the relevant provisions into the plan.

of this type, ie. medium-to high density residential housing with anchor community-centred activities, are particularly suitable to such heating systems.

3. Reverse Sensitivity

- The Plan Change addresses mitigation for potential reverse sensitivity in Appendix B under assessment against the RPS (2019) Objective 5.3. Setback distances are promoted to address a range of issues, though noise is not specifically addressed.
  ORC accepts that the applicant by the nature of its horticultural business will be awake to these issues, but requests that the methods and suggested conditions for managing this issue including to other neighbouring land uses (including racecourse and airfield and other non-applicant horticulture uses) be outlined clearly. 67/6
  RPS Policy 4.5.1 provides for urban growth and development to be managed in a strategic and co-ordinated way, including by:
  e) "Ensuring efficient use of land"; and
  h) "Restricting urban growth and development to areas that avoid reverse sensitivity effects unless those effects can be adequately managed".
  Proposed RPS **Policy 5.3.1** 'Rural Activities' provides for development in rural areas by:
  d) Restricting the establishment of incompatible activities in rural areas that are likely to lead to reverse sensitivity effects.
- **ORC requests** that CODC ensures that reverse sensitivity is adequately addressed to give effect to the RPS Policies for rural activities, recognising that urban and/or rural residential development into rural areas which is where primary production activities are to be maintained and provided for. 67/7

4. Density

- ORC has reviewed the Spatial Framework: Spatial plan (the Framework) for Cromwell. Acknowledging it is a

non-statutory document, it still gives an indication of the strategic considerations of the CODC and community for the future growth of Cromwell.

The Framework does not specifically identify the PC14 area at all in terms of future growth options, with the area highlighted in the Figure "Key Landscape and Open Space Features: (page 41) to be part of a horticulture production belt surrounding a well contained and intensified urban Cromwell. In light of the National Policy Statement for Highly Productive Land, and the NPS for Urban Development both of which may come into effect in the first half of 2020, CODC should be mindful of the direction of central government for protection of highly productive land (including from reverse sensitivity) via the NPS:HPL and the additional 'quality urban environments' criteria that are proposed in the NPS:UD adding to the simplistic supply base of the current NPSUDC including integration and connections. 67/8

- ORC is also concerned at the proposed density of the proposal with a majority (70%) of sections by count smaller than 1ha, including 45% (by count) 3000m² or smaller. 67/9
- Appendix B of the plan change (page 5) assesses against Objective 4.5 of the RPS (2019) yet promotes that it is 'rural residential/rural lifestyle'. This may be true of part of the proposal, yet clearly some of PC14 promotes density options that are essentially urban, or at least suburban. Appendix 1 of the ME Consulting Supply and Demand Report shows that the sub 1ha proposed zonings (*RL1 – RL3 Shannon Farm*) are smaller than the Rural Zonings and align closer to the existing Residential Resource Area (RRAx) zone set. The larger sites are more consistent with the existing surrounding zoning, but effectively act as a buffer or respond to landscape issues and enclose the more intensive residential concentration in the centre of the site. 67/10
- This proposal represents a significant intensification and 67/11

concentration of residential activity and future population in an area that has not been identified or considered previously, including in the most recent spatial plan undertaken for the area. However, on a simple network distance basis it is not significantly further from the Cromwell Town Centre (2.9km from Leyser driveway) than the riverside portions of urban Cromwell (2.6km) , and therefore if the proposal is granted, then it can and should be better integrated into the existing urban area and the services it provides. The State Highway does provide a logical boundary to urban Cromwell but also a strong barrier to integration – integrating the future population of Shannon Farm (into urban Cromwell therefore requires much greater consideration than has been offered by the applicant (see for example transportation below). 67/12

- 152 sites are proposed. As noted in the Demand and Supply Assessment, the expected occupants are likely to be wealthier, older couples without children. Assuming this holds true a future population (if fully occupied with usual residents and allowing for reasonable variation and vacancies) would be ~300 persons. However, many of these sites could also include home and income dwellings that include smaller dwellings, likely to be occupied by younger (or older again) households. Peak occupation (given the dwellings would have greater capacity than the usual population) could also be much higher. This only serves to highlight the need to ensure connectivity of this potential population beyond relying on private vehicles on the existing busy and vehicle dominated roading network. 67/13
- Other than addressing economic demand for housing, which the Supply and Demand Assessment has clearly articulated, the key issue is whether this proposal if granted would meet this need in a most sustainable and integrated way and deliver quality sustainable living opportunities or be ad hoc and lack strategic integration, 67/14

essentially urban development beyond the existing township, in direct contrast to the vision articulated in the Cromwell Spatial Framework.

- Careful consideration should be given to the potential precedent and future implications of this plan change for the future of the Cromwell rural fringe. 67/15
- **ORC requests** that CODC, irrespective of the outcome of this proposal, undertake to update and refresh the Cromwell Strategic Framework or other suitable strategy to account for rural/residential development beyond the existing urban area to provide clear guidance and infrastructure alignment to manage the demand for further lifestyle development and non-intensification demand as future development proposals of this type are likely to follow. 67/16

5. Transportation

- **The RPS (2019) Policy 4.5.3** on urban design requires:
  "good access and connectivity within and between communities:

  The Transport Assessment for PC14 does not assess the RPS (2019) under section 8, Statutory Framework. ORC notes this is also not addressed in Appendix B "Evaluation of Plan Change Against the Operative Policy Statement". 67/17

  The **Otago Southland Regional Land Transport Plan 2015 – 2021 (RLTP)** includes provisions:
  - Ensuring community resilience (Policy 4.8 of Objective 4); and
  - Providing for mode choice including walking, cycling and public transport (Policies 4.8, 4.9, 4.10 4.11 and 4.12)

  Implementation of the RLTP policies also supports drivers identified in the recent "*Low-emissions economy: Draft report*".[1] Developing emissions-reduction goals more centrally in government transport planning is identified as one driver in the report.
  In the Transport assessment Section 4.2 'non -car

		modes of travel' (page 8) PC14 makes an interesting observation: "*Given that the area is predominantly rural, it can reasonably be expected that it will be relatively lightly used by pedestrians and cyclists*"	
		• As the proposal is separated from urban Cromwell by a significantly used highway, this will provide a challenge as to how this plan change can promote the safe and effective connection into the existing Cromwell urban area with alternative modes of travel as required under the RLTP. This also appears to conflict with the assessment in the Plan Change Request document section E4.2 which notes the Cromwell town centre is within a practical cycling distance	67/18
		• The transport assessment places heavy reliance on the movement of people by cars and it is difficult to understand how it can conclude under 8.6.1 that the plan change request is aligned with the strategic objectives of the RLTP, let alone the RPS (2019).	67/19
		• **ORC requests** that CODC consider how the plan change might give effect to the policies of the Otago Southland RLTP 2018 and the RPS (2019) with respect to access, choice, connectivity and safe transport.	67/20

[1] https://www.productivity.govt.nz/sites/default/files/Productivity%20Commission Low-emissions%20economy_Draft%20report_FINAL%20WEB%20VERSION.pdf

68.	Public Health South on behalf of Southern District Health Board **Further Submitters** **130 Horticulture New Zealand** **149 NZ Transport Agency**	**<u>Oppose</u>** • Public Health South (PHS) has statutory obligations for public health within this area under Crown funding agreements between the Ministry of Health and the Southern District Health Board. The Ministry of Health requires public health services to advocate for the reduction of any potential health risks that are due to decisions made by local authorities. PC 14 covers matters with potential health effects on people and communities.	68/1	Approve Plan Change 14 with modifications as follows: In terms of Objective 16.3.1 (supported in part) that consideration be given to an underpass under SH6 and decreasing the speed limit to 80 kph before the Ripponvale Road turn off. In terms of Objective 16.3.2 (supported) that Objective 16.3.2 be retained. In terms of Objective 16.3.11 (supported in part) that

- The specific parts of PC14 to which this submission relates to include:
  - Air Quality
  - Community connectedness; and
  - Drinking water and wastewater reticulation.
- These provisions are shown in the schedule attached to the submission including whether the submitter supports or supports in part specific parts of PC 14, with suggested amendments and reasons stated.

Air Quality

- The site is located adjacent to an established orchard. Potential effects arising from legitimate horticultural activities include potential spray drift. The application does not discuss mitigation measures proposed to manage the effects of spray drift. Exposure to the chemicals in pesticides can result in adverse health effects.[1]
- The New Zealand Standard 8409:2004 Management of Agrichemicals Guidelines, Part G6 recommends a 10 metre setback where shelter is provided, and an air blast sprayer is used.[2]
- Having noted that, Public Health South's Air Quality advisor[3] to Plan Change 13 argued in her evidence that New Zealand Standard 8409:2004 Management of Agrichemicals Guidelines, Part G6 offers inadequate protection to avoid potential adverse effects from pesticide exposure from spray drift. This is especially true of abnormal operation (for which separation distances are recommended). The words from her evidence are quoted below:

  "For these reasons I consider that more reasonable separation distance between residences and agrichemical application (by air blast sprayer) would be at least 100 metres. This would provide a more reasonable distance for dispersion in the event that something goes wrong (e.g. change in wind direction

68/2 connection to reticulated sewerage needs to be a priority for all residential activity (ie. disposal of wastewater onsite on larger rural lots is not supported).

In terms of Objective 17.3.1 (supported in part) PHS strongly recommends considering measures that

68/3 acknowledge and mitigate reverse sensitivity of spray drift effects from neighbouring orchards. These should include a buffer distance of at least 100 metres between the boundary of orchard activity and any residential activity.

130/7 Horticulture New Zealand

68/4 Oppose

Oppose submission (68/1 – 68/11) in its entirety. The submitter raises valid concerns in relation to Air Quality, community connectedness and drinking water and wastewater reticulation. However, Horticulture New Zealand considers that the relief proposed will not sufficiently address the fundamental issue of the

68/5 inappropriate location for the proposed development. Reject decisions sought.

149/2 NZ Transport Agency

68/6 Support in Part and Oppose in Part

Support submission point 68/7. The NZ Transport Agency supports the submission where it raises concerns in regard to community connectedness to Cromwell. However, oppose suggested modifications to PC 14. Reject decision sought.

Oppose submission point 68/8. The suggested underpass by the submitter may not necessarily address all the safety issues and traffic effects on the highway from the proposal. Any potential mitigation measures for effects on the highway need to be considered in an integrated manner and consider the larger context of the State highway environment in this location. Reject decision sought.

during spraying). A key reason for specifying air quality separation distances is to prudently manage unintended or accidental discharges".

Community connectedness

- PHS is concerned about the lack of connectivity of the site with the established urban environment of Cromwell. The site is spatially separated from Cromwell by an orchard and rural land. Access to Cromwell is obtained via Kawarau Gorge Rd (SH6), which has a speed limit of 100 km/hr. Walking and cycling to schools, shops and community facilities from the PC14 land is not provided for. The location of PC14 therefore does not promote transportation alternatives such as cycling and walking that have physical health benefits. Physical activity is associated with many positive outcomes for individuals, including reducing the risk of depression and chronic diseases like heart disease and diabetes.[4] In addition, it also provides a number of community benefits such as increased productivity in local workplaces and improved perception of community safety as there are more people around in public places and increased livability in the local area.[5] 68/7
- Other concerns include traffic management from Ripponvale Road onto SH6. Reducing the speed on SH6 before the Ripponvale Road entrance will create a safer and more efficient traffic flow from Ripponvale Road onto SH6. A further recommendation includes the inclusion of an underpass from Ripponvale Road under SH6, which will allow a safe access for walkers and cyclists into Cromwell and will reduce the severance effect. 68/8

Drinking water and wastewater reticulation

- PHS recommends connecting drinking water and wastewater to a reticulated source. This is particularly important as there is likely to be future development in this area. 68/9

- A Three Waters Review (2017), initiated by the Government was established to improve the regulations and supply of the three waters (drinking water, wastewater and stormwater). Effective sources and systems of the three waters are an essential component of health and safety, prosperity and the environment of our communities.[6] 68/10
- Public Health consequences associated with a lack of infrastructure and integration of the three water services introduces the risk of disease outbreaks from communicable diseases, and puts pressure on the environment. 68/11

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[1] Kim, K et al., (2017). Exposure to pesticides and the associated human health effects. Sci Total Environ. Jan 1;575:525-535

[2] New Zealand Standard: Management of Agrichemicals. NZS8409:2004. 2004. https://shop.standards.govt.nz/catalog/8409:2004(NZS)/scope (accessed Nov 28, 2019).

[3] Louise Wickham in her evidence to the CODC Plan Change 13 Hearings 2019

[4] Ministry of Health. Physical activity and health conditions. 2019. http://www.health.govt.nz/your-health/healthy-living/food-and-physical-activity/physical-activity/being-active-everyone-every-age/physical-activity-and-health-conditions (accessed Oct 21, 2019).

[5] Goodin, H. Evidence Snapshot. Promoting Physical Activity at the Local Government Level. Agencies for Nutrition Action, p4. 2015. http://www.healthyaucklandtogether.org.nz/assets/Uploads/ana-evidencesnapshot.pdf (accessed Oct 21, 2019).

[6] Department of Internal Affairs. Three Waters Review. 2019. https://www.dia.govt.nz/Three-waters-review#Cabinet (accessed Nov 25, 2019).

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69. Duncan Randall

Further Submitter 116.2 Cromwell Mountain Bike Club

Conditionally Support

We as a Club [Cromwell Mountain Bike Club (Cromtbc)] support PC 14 under the following circumstances:

- The proposed recreation area be made available for mountain bike trail development by Cromtbc.
- We aren't restricted to simply using existing trails on the land for mountain bike use.
- Cromtbc is allowed the space to design and build

69/1 Approve with modifications ie. approve Plan Change 14 in its entirety including points raised in submission.

116.2/8 Cromwell Mountain Bike Club

Support

Supports submission 69 in its entirety. The development of world class mountain bike trails in the proposed

		multiple trails in the recreational area. • The trails built by Cromtbc will be accessible by anyone wishes to do so, not just Shannon Farm residents.		recreation zone will be a great asset for the community of Cromwell and Central Otago. The submission seeks that Cromwell Mountain Bike Club is allowed to build multiple trails in the recreational area. The appropriate mechanism to allow the building of trails is amendment to standard [Rule] 4.7.6L to provide that cutting of mountain bike trails and tracks, including associated earthworks, within the Outstanding Natural Landscape area as identified on the structure plan in Schedule 19.23 is a permitted or controlled activity, or a similar amendment with this effect. Allow submission.
70.	Residents for Responsible Development Cromwell **Further Submitter** **149 NZ Transport Agency**	**<u>Oppose</u>** • The submission relates to PC 14 in its entirety. The submitter is an incorporated society representing residents of Cromwell and its object (ie. purpose) is: *"The responsible, sustainable quality growth and development of Cromwell."*	70/1	Decline Plan Change 14. In the alternative, modify Plan Change 14 to avoid, remedy or mitigate the effects/concerns identified in the submission. **149/3 NZ Transport Agency** <u>Support</u> Supports submission points 70/6 and 70/9. The NZ Transport Agency supports the submission points that PC 14 is inconsistent with the Cromwell Masterplan Spatial Framework and will result in undue traffic effects. Accept decision sought to decline PC 14 in its entirety.
		• The submitter opposes PC 14 unless or until its concerns relating to PC 14 are resolved.	70/2	
		In its current form, PC 14: • Will not implement and/or give effect to the objectives, policies and other provisions of the relevant planning instruments, including the other strategic and more specific provisions of the PDP, as well as the Regional Policy Statement; and	70/3	
		• Are otherwise inconsistent with and/or will not achieve the purpose of the RMA and the other provisions of Part 2 of the RMA; and	70/4	
		• Fail to meet the requirements of section 32 of the RMA.	70/5	
		In addition, and without limiting the above, in its current form, PC 14: • Is inconsistent with the Cromwell Masterplan Spatial Framework, which is intended to guide plan zoning and	70/6	

		development – and is "crucial for the future development of the Cromwell basin". The Plan was developed from community feedback received in 2018, and was adopted by the Cromwell Community Board in May 2019. Key priorities from community feedback included: (i) retaining productive land; (ii) containing future growth within Cromwell; and (iii) encouraging intensification of residential properties within walkable distance from the Town Centre.		
		• Will result in a loss of productive land.	70/7	
		• Will generate reverse sensitivity effects on established surrounding areas.	70/8	
		• Will result in undue traffic effects.	70/9	
		• Will result in undue light pollution to the Cromwell Basin.	70/10	
71.	Patrick Oliver Rivett	**Support** PC 14 supports economic growth, gives Cromwell some larger building sections and supports transition from urban to rural.	71/1	Approve Plan Change 14 in its entirety.
72.	Rockburn Wines Limited	**Oppose in Part** The submission relates to Plan Change in its entirety.	72/1	Decline Plan Change 14 unless Rockburn's winery activities are fully protected. At this time reverse sensitivity issues have not adequately been provided for.
		Introduction Rockburn owns and operates a winery at 156 Ripponvale Road, Cromwell, legal description Lot 1 DP 362547 that is contiguous to the PC 14 site. Rockburn relocated their facility to Ripponvale in 2015 as a result of ongoing growth and demand. A significant factor in relocating to Ripponvale was the rural environment supportive of productive agricultural activities	72/2	
		PC 14 currently fails to protect Rockburn from reverse sensitivity effects. Rockburn is concerned about the potential incompatibility of residential development close to an existing winery that operates 24/7 during vintage. PC 14 has the potential to result in additional constraints on Rockburn's activities and ability to develop over time.	72/3	

For this reason, Rockburn opposes PC 14 in part, and seeks amendments to ensure reverse sensitivity concerns can be addressed. 72/4

Specific Reasons

PC 14 is opposed on the following basis:

Noise

(a) Noise from rural activities has the potential to adversely impact residents of PC 14. Residential development is inherently incompatible with rural activities that produce noise at night. During vintage, trucks and heavy machinery must access the winery at all hours of the night. 72/5

(b) Currently the nearest house is approximately 150m from the winery. That house is associated with an established orchard. Rural people understand the seasonal demands of production and are tolerant of each other's needs. Rockburn has no confidence that new residents not involved in primary production will be as tolerant of Rockburn's winery as our current neighbour is. "Lifestyle" people are more concerned with protecting their lifestyle, which does not usually include making wine in the middle of the night. 72/6

(c) PC 14 retains Rule 4.7.6E to control noise. No assessment is made of whether these noise controls remain appropriate for the density of residential activity promoted by PC 14, or whether that rule adequately protects Rockburn. 72/7

(d) All proposed dwellings should meet the World Health Organisation standards for acceptable noise levels within habitable spaces. 72/8

(e) There are no methods available to mitigate noise on outdoor residential activity. This is inconsistent with outdoor amenity values associated with rural residential activity. 72/9

(f) Noise is particularly subjective, which tends to polarise people. Some will be ambivalent to the 72/10

noise of rural activities, whereas others will consider it intrusive and highly irritating. Irritation and annoyance can occur even when noise remains at levels that are objectively reasonable.

Objectives, Policies and Rules.

(g) PC 14 is inconsistent with the Objectives and Policies of the Operative Central Otago District Plan. In particular, proposed Policy 4.4.18 which is inconsistent with the operative District Plan framework. 72/11

(h) PC 14 is inconsistent with the Objectives and policies of the National Policy Statement – Urban Development Capacity. 72/12

(i) Reverse sensitivity effects have not been adequately addressed within the application, and fails to give effect to the operative Regional Policy Statement and proposed Regional Policy Statement, most notably the following policies: 72/13

- Proposed RPS, Objective 4..5 and Policy 4.5.1; and

- Proposed RPS, Objective 5.3 and Policy 5.3.1

Use of land

(j) The land adjacent to Rockburn's winery is a well-established orchard. Appendix L (Landcare Research Soil Investigation) does not assess the soil for suitability for horticulture. It simply reports that the soil type is not suitable for "intensive arable cropping". That is hardly a relevant observation in Cromwell. Nobody is suggesting intensive arable cropping as a use of this land. The land on the Waenga soil type (shown in brown) is well suited for horticulture and has available water in a storage pond. 72/14

(k) Rockburn is concerned about the loss of good horticulture land in Central Otago to housing. Land suitable for horticultural production should not be converted to houses. 72/15

		Relief Sought Rockburn opposes the design of Plan Change 14: (a) It places residential activity on land that is suitable for horticultural production and is currently used for that activity. Good production land is becoming scarce in the Central Otago District. The best production land on the site is the existing orchard on the alluvial fan close to Rockburn Winery. That land should not be used for houses. RLA2 and RLA4 should be shown as "H" (Horticulture) with no houses permitted. (b) The RLA4 and RLA2 areas place houses too close to Rockburn's Winery and risks creating reverse sensitivity effects. Rockburn objects to any new lifestyle housing development north and west of the Ripponvale Road corner within the areas shown as RLA4 and RLA2. If the Plan Change is allowed at all, RLA2 and RLA4 should instead be shown as "H" (Horticulture) with no houses permitted. • Rockburn opposes Plan Change 14 on the basis that reverse sensitivity issues have not adequately been provided for.	72/16 72/17 72/18	
73.	Duncan Stewart Sangster	**Support** Lifestyle blocks so close to town are hard to get and will be an asset to Cromwell.	73/1	Approve Plan Change 14.
74.	Daniel Scheibmair	**Conditionally Support** • The specific provisions of Plan Change 14 that the submission relates to are Provision 1.iii) to amend Rule 4.7.2(ii)(a)(i) to allow smaller allotment areas within RLA 1 – RLA 5, and Provision 1.iv) to insert new Rule 4.7.2(ii)(a)(vi) requiring that subdivision be undertaken in general accordance with the Structure Plan in Schedules 19.23 and 19.24	74/1	Approve Plan Change 14 with modifications such that the Schedule 19.24 be amended, and a new rule be created/inserted if necessary, to ensure that McFelin Road cannot become a through road carrying the significantly higher vehicle movements that the amendment to Rule 4.7.2(ii)(a)(i) would create. If McFelin Road remains a dead end road (ie. will not be connected

		• Schedule 19.24 depicts a new 'Minor Road', which would terminate at the northern boundary connecting to the paper road end of McFelin Road. As amendment to Rule 4.7.2(ii)(a)(i) would see a significantly higher density of housing and population, and accordingly vehicle volumes than if the land was developed under the current rule, Schedule 19.24 should be amended to the minor road does NOT connect to the paper road, and McFelin Road remains a dead end. If needed an additional clause could be created to ensure that a through road connecting Ripponvale and Burn Cottage Roads via McFelin Road cannot ever be formed.	74/2	to the new 'Minor Road') then there is no objection to the amendment of Rule 4.7.2(ii)(a)(i).
75.	Lindsay Charles Scott	**Support** The submitter supports PC 14 but would like to see the District Council make a determined effort to open the paper road over to McFelin Road.	75/1	Approve Plan Change 14.
76.	Barry John Scurr	**Support** PC 14 provides good availability of real estate, provides sustainable growth to Cromwell District along with employment opportunities that can only be good. A well balanced proposal for the betterment of Cromwell.	76/1	Approve Plan Change 14 in its entirety.
77.	Brett Sherriff	**Support** PC 14 gives residents of Cromwell more diversity in regard to housing options and provides a wide range of lifestyle block sizes from 2000m^2 to in excess of 3 ha.	77/1	Approve Plan Change 14 in its entirety.
78.	Alan Tony Smith	**Oppose** • The specific provisions of Plan Change 14 that the submission relates to are the minimum size of the allotments within the proposed subdivision and effects rural activities will have on these allotments and increased traffic flows on Ripponvale Road.	78/1	Decline Plan Change 14 – don't allow allotments smaller than currently allowed – 2 ha or average of 8 ha.

• The District Plan already allows for allotments to be a minimum size of 2 ha which for a rural area is fine, but anything smaller is creating nothing more than a large residential section of which we already have plenty more planned and already under development within the town area.	78/2
• The submitter has previously expressed his concerns on this matter to the Council in August 2016 (letter attached to the submission) and still we seem to be heading down the same road again. Frost fans operate on orchards in the Ripponvale Road area including the submitter's own and those on the Cherry Corp property any time from 11pm to 9am and can be heard quite clearly from within the submitter's own home throughout the night during the frosty periods of the season and we all accept this as part of living in a rural area. But beware if we have an influx of up to a minimum of 150 extra residents on properties way smaller than the rules currently allow does the Council not think we are going to have complaints regarding both noise and agricultural spraying.	78/3
• The problems currently being experienced in Letts Gully Road Alexandra will be the tip of the iceberg and how will the Council deal with the tidal wave of complaints from this development once frost protection gets underway in the future.	78/4
• How will Ripponvale Road cope with the extra traffic flow which one could presume to increase by at least four times above the current rate on a road which is barely wide enough now to allow two large trucks to pass safely let alone the safety of the large number of cyclists that use the road.	78/5
• Should this development go ahead will it set a precedent allowing all other properties on Ripponvale Road to also be subdivided down to as small as 2000 sqm?, All things the Council needs to consider very carefully as this	78/6

		could see an end to cherry growing for any neighbouring properties in the area as both spraying and frost protection will become impossible. • We seem to be seeing the Council being pushed into corners by developers all for the profit of those developers but at a cost to the existing communities. • Do the right thing and enforce the current rules as they are.	78/7 78/8	
79.	Irene Dale Smith	**Support** PC 14 will provide: • Diversification of section sizes for the local housing market. • Recreation and public access to more countryside; more employment opportunities.	79/1 79/2	Approve Plan Change 14.
80.	Ewan James Soper	**Support** PC 14 provides greater supply and diversified stock to the local housing market hopefully that will mean you leave the golf course alone.	80/1	Approve Plan Change 14.
81.	Matt Squires **Further Submitter 116.2 Cromwell Mountain Bike Club**	**Conditionally Support** We as a Club [Cromwell Mountain Bike Club (Cromtbc)] support PC 14 under the following circumstances: • The proposed recreation area be made available for mountain bike trail development by Cromtbc. • We aren't restricted to simply using existing trails on the land for mountain bike use. • Cromtbc is allowed the space to design and build multiple trails in the recreational area. • The trails built by Cromtbc will be accessible by anyone wishes to do so, not just Shannon Farm residents.	81/1	Approve with modifications ie. approve Plan Change 14 in its entirety including points raised in submission. **116.2/9 Cromwell Mountain Bike Club** Support Supports submission 81 in its entirety. The development of world class mountain bike trails in the proposed recreation zone will be a great asset for the community of Cromwell and Central Otago. The submission seeks that Cromwell Mountain Bike Club is allowed to build multiple trails in the recreational area. The appropriate mechanism to allow the building of trails is amendment to standard [Rule] 4.7.6L to provide that

				cutting of mountain bike trails and tracks, including associated earthworks, within the Outstanding Natural Landscape area as identified on the structure plan in Schedule 19.23 is a permitted or controlled activity, or a similar amendment with this effect. Allow submission.
82.	David Garth Stark	**Oppose in Part** • The specific provisions of PC 14 that the submission relates to are: - Connectivity for off-road access along Ripponvale Road. - Adverse impact of visual amenity for hillside development. - Promotion of large lot (3000m^2 and over) development representing an inefficient use of the land. • The submitter considers connectivity to be a very important issue to be managed in relation to Cromwell's growth. The applicant also owns the adjacent property that extends along Ripponvale Road to Kawarau Gorge Road which presents an opportunity to deliver an off-road verge down the length of that road from the proposed subdivision to within a short distance of town for the benefit of future residents of the development and the wider Cromwell community. This is particularly important as the level of motorised vehicle traffic along Ripponvale Road will increase significantly as a result of the proposed development and the recreation reserve area provided for in the application will be accessed by cyclists and pedestrians from town. • PC 14 allows for an amenity edge that extends only a short distance along Ripponvale Road. Alternative forms of transport, such as cycling, as a method of residents accessing town should be promoted and provided for as part of this development. The property on the other side of Kawarau Gorge Road is likely to be developed at some stage so a coherent trail network should be	82/1 82/2 82/3	Approve Plan Change 14 with significant modifications as follows: • Require a mixed-use path extending from the proposed development to Kawarau Gorge Road at an appropriate crossing point for eventual connection into the existing town area. The Council should promote a trail network to be developed to facilitate non-motorised connectivity from the property into the town centre. • Require the applicant to modify its proposal to extend the recreational area to encompass a greater portion of the hill and increase the area designated RLA1 to cover a greater portion of the land on the flatter parts of the property. • Require amenity areas to provide connections linking Ripponvale Road to the recreational area marked ONL on the page 43 plan at appropriate points to enable a loop track to be developed around the boundary of the property. • Ensure that the mechanism facilitating the recreational space is secure and robust so that it cannot be undermined in the future.

developed to facilitate non-motorised connectivity from the property subject to the plan change application into the town centre.

- The submitter attended several consultation sessions relating to the Cromwell Masterplan and a number of people were opposed to new houses being built on the hills surrounding the Cromwell Basin that compromised the visual amenity and sense of open space that is highly valued by the community. People expressed a preference for a more clustered approach to landscape development where houses were more tightly grouped rather than scattered across a wide area. This also provides greater efficiency in the services and roading for the developer. Therefore, the submitter opposes the aspects of the plan change that facilitate the development of housing any significant distance up the hillsides and consider that these parts of the should be included in the open space area marked ONL on the plan on page 43 of the application. 82/4
- As compensation for the extension of the open space area, which would result in the loss of the RLA5 area, one of the RLA4 areas and part of the RLA3 area, the submitter suggests that higher density be provided for across the remaining areas of the plan such as 2000m2 minimum lot size across the lower parts of the property. This will provide for much greater efficiency in the use of the land, the required services and the roading infrastructure and increase the recreation area available for residents. 82/5
- The submitter considers that 3,000m2 and 4,000m2 sections tend to be underutilised and result in an inefficient use of land. If the Council is going to approve a plan change away from the existing town boundaries it should do so in a manner that promotes the efficient use of that land rather than larger section sizes that eventually just results in even more rural land being subdivided to meet the requirements of the town's growing population and demand for rural-type sections. 82/6

83.	Gordon McAlpine Stewart	**Conditionally Support** • North of Shannon Farm is a paper road extension of McFelin Road which the submitter has highlighted the approximate location of on the plan attached to the submission. Public Access, at least for walking, biking or riding should be granted to this, so that in the future a trail may be formed linking with the formed part of McFelin Road. This will offer another option for residents who get out and about.	83/1	Approve Plan Change 14 subject to matters raised in submission.
		• As the residential lots being created are on productive land and are of a significant size, an allocation of or access to rural water should be placed. This will give the Owners the opportunity to put the land to good use. The property as a whole receives a significant quota from the Ripponvale Irrigation Scheme.	83/2	
		• Purchasers of the lots should be made well aware that they are close to a working orchard environment both with NZ Cherry Corp and other Ripponvale neighbours. Wind machines, helicopters, bird shooting and spraying will occur.	83/3	
		• The proposal to place the hill block into a public reserve is meritorious and will be much appreciated by future generations. The submitter suggests that some grazing of this be catered for to reduce fire risk. Controlling of rabbits and possums will be required.	83/4	
		• Overall it is the submitter's opinion that the proposed subdivision has significant merit, particularly in its location close to Cromwell. Although Ripponvale is zoned for up to 2 ha lots there are already 12 residential lots significantly smaller than this in area. Plan Change 14 is putting in place what has already occurred.	83/5	
84.	Holly Kathleen Tate	**Support** • Cromwell needs the growth as it is the in between of both Queenstown and Wanaka and they need the	84/1	Approve Plan Change 14.

		support for work, housing, accommodation. • The airport should be based in Cromwell to back up Queenstown and Wanaka also.	84/2	
85.	Bob Tovey	**Conditionally Support** • The submitter feels that too much of our higher countryside is being cut up and developed when there is plenty of land on the valley floor to still develop.	85/1	Approve Plan Change 14 with modifications as detailed in submission.
		• Zones RLA5 RLA4 RLA3 that are at the back of the proposed subdivision (North side) should not be built on and the flat land RLA1, RLA2 and RLA4 should be more intensely developed down to 2000m^2. So therefore the net impact to the development $ wise would not be affected for the developers. With services not having to run up the hill so far and no roading having to be built up on the higher ground, and a more intense development on the valley floor.	85/2	
		• There should be a screening of a belt of trees/planted soil bund on the roadside of the subdivision to minimise visual impact of rooflines and buildings in the subdivision. With pockets/glades within the subdivision planted up with trees to break rooflines so we don't have a subdivision like Shotover Country/Lake Hayes Estate where there are no large trees just roofs for miles.	85/3	
		• Roads on the subdivision need to be wide enough for a car to be parked on each side traffic be able to flow **unlike** Summerfields Estate.	85/4	
		• There should also be a cycle path/footpath incorporated into the plan so that this joins the area to the town centre without people having to ride along Ripponvale Road that will obviously be a lot busier with this new development. So children can ride to school etc through greenways.	85/5	
		• The visual impact of a few houses and driveways scarring the side of this amazing bowl of land for the sake of a few houses seems a waste as the visual impact to the whole Ripponvale valley would be great.	85/6	

		• The submitter has just built a $500k extension to his house and deck using this bowl as his view shafts because it is so amazing.	85/7	
86.	Reece van der Velden	**Support** PC 14 will help grow Cromwell like a Millbrook of Cromwell. Much needed lifestyle residential. More employment opportunities.	86/1	Approve Plan Change 14.
87.	Richard Murray Wallis & Catherine Mary Woods	**Oppose** • The specific provisions of Plan Change 14 that the submission relates to are that the submitters' amenity values are affected, traffic movements, fire fighting concerns.	87/1	Decline Plan Change 14 in its present form.
		• The submitters oppose the application in its present form as some proposed sections are too small. They believe their amenity values in the area will be affected if sections can be subdivided smaller than 2 hectares. To allow lots as small as 2000m^2 is virtually a residential section in a rural area and are not viable to achieve any rural type activity. This would make doing rural activities harder for others in the area and would have reverse sensitivity implications.	87/2	
		• The Traffic Control Plan does not monitor the extra traffic flows during the fruit season/holiday period on Ripponvale Road. There are significant flows of traffic and vehicles parking on the road during this period. It also does not consider cyclist groups who use Ripponvale Road to do laps during the summer.	87/3	
		• If PC 14 is approved in its present form there would be additional traffic on Ripponvale Road. The additional traffic produced would be significantly more than the current residential population combined. The submitters believe that the section of road from Shannons Farm to State Highway 6 at the north end of Ripponvale Road should be improved to allow for this.	87/4	

		• As there will be a significant number of sections if approved, the submitters believe a fire fighting plan or hydrants should be allowed for in the subdivision. To have over 100 lots in such close proximity and rely on what a rural water tank would hold for fire fighting in the submitters' minds would be insufficient. It would be remiss of the Council to allow for this to happen. • If PC 14 were amended to not have lots smaller than 2 hectares and to address the submitters' traffic and fire fighting submission, the submitters would support the application.	87/5 87/6	
88.	Toby Fredrick Wallis	**Support** PC 14 provides economic benefits from increased area in cherries and comprehensive design including a seasonal workers accommodation base that is part of the wider development planned by NZ Cherry Corp.	88/1	Approve Plan Change 14 in its entirety.
89.	Patrick Waser	**Support** PC 14 promotes sustainable growth in the Cromwell District, creates more employment opportunities and provides greater supply and diversified stock to the local housing market.	89/1	Approve Plan Change 14 in its entirety.
90.	David Stephen Webb **Further Submitter 116.2 Cromwell Mountain Bike Club**	**Conditionally Support** We as a Club [Cromwell Mountain Bike Club (Cromtbc)] support PC 14 under the following circumstances: • The proposed recreation area be made available for mountain bike trail development by Cromtbc. • We aren't restricted to simply using existing trails on the land for mountain bike use. • Cromtbc is allowed the space to design and build multiple trails in the recreational area. • The trails built by Cromtbc will be accessible by anyone wishes to do so, not just Shannon Farm residents.	90/1	Approve with modifications ie. approve Plan Change 14 in its entirety including points raised in submission. **116.2/10 Cromwell Mountain Bike Club** Support Supports submission 90 in its entirety. The development of world class mountain bike trails in the proposed recreation zone will be a great asset for the community of Cromwell and Central Otago. The submission seeks that Cromwell Mountain Bike Club

				is allowed to build multiple trails in the recreational area. The appropriate mechanism to allow the building of trails is amendment to standard [Rule] 4.7.6L to provide that cutting of mountain bike trails and tracks, including associated earthworks, within the Outstanding Natural Landscape area as identified on the structure plan in Schedule 19.23 is a permitted or controlled activity, or a similar amendment with this effect. Allow submission.
91.	Lynette Winsloe	**Support** PC 14 will bring employment opportunities for many people, access to hill tracks for general public and will bring benefits to many different sectors in the community.	91/1	Approve Plan Change 14.
92.	Alastair William Wood	**Support** PC 14 provides public access to hill tracks, protection of the higher elevated areas, greater supply of lifestyle size sections, sustainable growth, greater employment with expansion of the cherry orchard.	92/1	Approve Plan Change 14 in its entirety.
93.	Donald Alan Young	**Conditionally Support** The specific provisions of the proposal that the submission relates to are the boundary fence of the western park area and the road proposal through to Burn Cottage Road. PC 14 is supported on the condition that the hill park area and the road are fenced off with new rabbit netting fencing. Rabbits will always be a problem.	93/1	Approve Plan Change 14 subject to all boundary fencing being rabbit proofed and road line fencing also being rabbit proofed.
94.	M & BC Zareh	**Support** As an adjoining owner the submitters fully support PC 14 and consider it will result in appropriate use of the land. Additional reasons for their support are as follows: • PC 14 results in an expansion of the Pisa Range Outstanding Natural Landscape to encompass and protect a larger area of the visually significant slope.	94/1 94/2	Approve Plan Change 14 in its entirety.

• Through the proposed structure plan and proposed rules NZ Cherry Corp will expand their cherry operation and therefore this will result in a more intensive use of the soil resource resulting in benefits for productive capacity.	94/3
• The structure plan is a considered response to development of the site in that larger lots are located towards the outlying areas of the site where there are greater landscape values and a greater degree of landscape sensitivity while the smaller lots are to be located on the flat central part of the site. No build areas have also been identified in areas that are visually sensitivity or subject to natural hazards.	94/4
• The structure plan also provides for larger sites at the perimeter of the site and small sites located within the development creating more potential for a buffer to adjoining rural activities. Planting at the site boundaries will also help mitigate potential reverse sensitivity effects.	94/5
• The proposal will provide another offering to the market (for rural lifestyle lots) within the Cromwell area and the five Rural Lifestyle Areas provide a range of future rural lifestyle living opportunities.	94/6
• PC 14 consolidates an area of rural lifestyle living by extending the rural residential zone along Ripponvale Road and therefore by directing rural residential/rural lifestyle development to this area allows for cohesive future expansion and prevents or discourages further fragmentation of Cromwell's soil resource in an ad-hoc manner.	94/7
• The PC 14 area is only a short distance from Cromwell's town and business/industrial areas. This means that the PC 14 area will still be reliant on Cromwell's centres rather than in competition and residents of this area will still contribute economically to Cromwell and the wider district.	94/8
• The development of the site has the potential to result in	94/9

job creation for the cherry orchard, plus site works and building works which will contribute economically to Cromwell.

- PC 14 will provide public access for walking and biking tracks within the ONL which adds to the community's recreation opportunities. 94/10