

RESOURCE MANAGEMENT ACT 1991

FORM 6

RECEIVED  
01/03/2022  
CODC

FURTHER SUBMISSION IN SUPPORT OF, OR IN OPPOSITION TO SUBMISSION ON  
PUBLICLY NOTIFIED PROPOSED PLAN CHANGE  
TO CENTRAL OTAGO DISTRICT PLAN

Clause 8 of Schedule 1, Resource Management Act 1991

To: Central Otago District Council  
PO Box 122  
ALEXANDRA 9340

Werner Murray

Name of person making further submission: .....  
(Full name)

This is a further submission in support of (or in opposition to) a submission on Proposed Plan Change 18 to the Central Otago District Plan.

I am:

1. A person representing a relevant aspect of the public interest, the grounds for saying this being:  
The land being rezoned is owned by the Cromwell Community Board ; or

2. A person who has an interest in the proposal that is great than the interest the general public has, the grounds for saying this being:  
..... ; or  
(Please state whether you are a person who may make a submission under 1 and/or 2 above and also specify/explain the grounds for saying that you come within category 1 and/or 2)

3. The local authority for the relevant area.

I support (or oppose) the submission of:

I oppose the submission by the Director-General of Conservation in its current form on Plan Change 18  
(Please state the name and address of original submitter and submission number and submission point number of the original submission)

The reasons for my support (or opposition) are:

See attached  
.....  
.....  
.....  
.....

(Please give reasons and continue on an additional page if necessary)

I seek that the whole (or part [describe part]) of the submission be allowed (or disallowed):

See attached  
.....  
.....  
(Please give precise details)

**I wish (or do not wish) to be hearing in support of my further submission.**

*(Please strike out as applicable)*

**If others make a similar submission , I will consider presenting a joint case with them at a hearing.**

*(Please delete if you would not consider presenting a joint case)*



.....  
**Signature of person making Further Submission**

(or person authorised to sign on behalf of person making further submission)

(A signature is not required if you make a submission by electronic means)

22 Feb 2022

.....  
**Date**

**Electronic address for service of submitter:** ..... [carolynwerner@mac.com](mailto:carolynwerner@mac.com) .....

**Telephone No:** ..... [027 445 6845](tel:0274456845) .....

**Postal Address:** ..... [23A Miners Terrace](#) .....  
..... [Bannockburn](#) .....  
.....

[Werner Murray](#)

**Contact Person:** .....  
(name & designation, if applicable)

**FURTHER SUBMISSIONS IN SUPPORT OF, OR IN OPPOSITION TO, ANY SUBMISSION ON PROPOSED PLAN CHANGE 18 CLOSE ON THURSDAY, 3 MARCH 2022.**

**Note to person making submission**

A copy of your further submission must be served on the original submitter within 5 working days after it is served on the local authority.

Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least 1 of the following applies to the submission (or part of the submission):

- it is frivolous or vexatious:
- it discloses no reasonable or relevant case:
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further:
- it contains offensive language:
- it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

## **Attachment to form 6 further submission in support of, or in opposition to submission on publicly notified proposed plan change to Central Otago District Plan**

The reasons for my support (or opposition) are:

My submission included among other things, that I believe that a structure plan should be put in place due to the size of the development so that the resulting development is efficient. Director-General of Conservation has mentioned in their submission that a buffer should be provided for next to the Chafer beetle reserve. While I support the need to look at edge effects, I do not support the relief that is sought by Director-General of Conservation especially the proposed buffer or conversion of the land to open space zone.

My view is that the potential effects should be considered, and mitigations be put in place that address **those** effects. Rather than simply stating that a buffer would suffice. In my opinion the matters that are raised by the Director-General of Conservation would best be dealt with via a structure plan where there can be more refinement rather than requiring a buffer to be put in place at this stage. Alternatively, perhaps rules would be better suited to address the concerns raised. Note that I have gone through the concerns raised below and itemised what would potentially be a more effective management tool than a buffer.

The Director-General of Conservation has asked for a 25 x 1100m buffer/open space zone to be applied over the site. A buffer would significantly affect any structure plan/master plan over the area of 52Ha. Especially since 25 metres is the depth of a lot. For instance, if lots were 25 x 30m in size a buffer could mean a loss of 36 lots along the boundary. Alternatively, it would mean a different road corridor alignment, effectively resulting in an inefficient subdivision design.

My view is that a buffer is a blunt tool and has the potential to create perverse outcomes that will result in inefficient design.

### **Issues raised by Director-General of Conservation**

#### ***Pests and Weeds***

For instance, a buffer will not address the issue that is raised about pests and weeds spreading. It is difficult to see how the situation would get worse in terms of weeds than the current situation. Potentially fencing is more appropriate to deal with these effects. This can be done under the fencing act.

#### ***Shading and Sheltering***

No shading diagrams have been provided, and the effects of shading and on the part of the reserve bordering the proposed industrial land, so it is difficult to comment. As a general rule of thumb recession planes deal with shading matters. Note it doesn't appear that there are recession plane in the industrial zone at present. The effects of potentially sheltering the land from northerlies have not been qualified.

I don't consider that there is enough evidence to support this change. Given that it would result in an area of approximately 2.3Ha in size.

### ***Hydrology***

Comments around the change in Hydrology have not been appropriately substantiated. Land is developed in accordance with NZS4404:2004 CODC amendment. This land development and subdivision infrastructure standard has a requirement to replicate the pre-development hydrological regime. Again a buffer does not address this NZS4404:2004 addresses this matter.

### ***Lighting***

I agree that artificial lighting causes an issue not only for the reserve but also generally. CODC supports a dark sky lighting strategy and private land-owners could undermine this. Adopting a dark sky framework for lighting would be appropriate.

### ***Setbacks/Buffer***

As briefly outlined above setbacks do not directly relate to the effects that are being described. My preference is that the effects are looked at and appropriate measures are put in place to mitigate potential effects, rather than simply stipulating that a buffer is required.

### ***Structure Plan***

I note that my submission included that I believe that there should be a structure plan put in place over the land subject to the plan change. A structure plan is critical to developing such a large landholding (52Ha). This may well be done by the landowner prior to subdivision. A structure plan would address traffic, transport, connectivity, pedestrian movement, and key infrastructure.

I think that more consideration is required before being able to accept a statement like the below:

*"...zoned as open space, which would have the dual effect of limiting future development in that buffer, while also providing for public access to the area around and to the reserve."*

Access is better dealt with via a structure plan when appropriate urban design, traffic, parks, and engineering advice is available, rather than simply lumping it together with a buffer that from the evidence that I have seen I am not convinced is required.