

**SUBMISSION ON A RESOURCE CONSENT APPLICATION TO THE
CENTRAL OTAGO DISTRICT COUNCIL**

UNDER the Resource Management Act 1991

IN THE MATTER of RC230328, an application for resource consent to undertake a “farm park” style subdivision comprising 16 residential sized lots and one productive lot at 5 Māori Point Road, Tarras

BY **TARRAS INDUSTRIES LIMITED**

Submitter

SUBMISSION OF TARRAS INDUSTRIES LIMITED

Dated: 14 February 2025

Introduction

- [1] This is a submission on behalf of Tarras Industries Limited (**Submitter**) in relation to RC230328, an application for resource consent to undertake a “farm park” style subdivision comprising 16 residential sized lots and one productive lot at 5 Māori Point Road, Tarras (**Application / Proposal**).
- [2] The Application was made by Clutha Plains Trust (**Applicant**).
- [3] The Submitter could not gain an advantage in trade competition through this submission.
- [4] The Submitter wishes to be heard in support of this submission.
- [5] If others make a similar submission, the Submitter will consider presenting a joint case with them at the hearing.
- [6] The Submitter submits in opposition to the Application for the below reasons.

Background

- [7] The Submitter owns land at Bells Lane, Tarras, legally described as Lot 3 DP 413524 (**Submitter Property**).
- [8] A map of the Submitter Property and Application Site is attached as **Appendix 1**.
- [9] The Submitter Property is currently used for agricultural purposes.

Submissions

- [10] The Submitter submits that the Application should be declined in its entirety for the following reasons:

Landscape and visual amenity effects

- [11] The Proposal has the potential to significantly alter the existing rural landscape by introducing a dense residential pattern that is inconsistent with the surrounding environment. The creation of 16 new residential lots (and one balance lot) clustered along the terrace edge will lead to

increased built form visibility, which is contrary to the established open and rural character of the area.

- [12] While the Applicant proposes mitigation through landscaping and setbacks, the scale and intensity of development will result in an unavoidable change to the visual amenity of Māori Point Road and the wider Tarras / Lindis landscape. The subdivision represents an incremental rural-urbanisation of a rural area, setting a precedent for further similar developments that could cumulatively degrade the visual quality and openness of the landscape.

Cumulative effects and precedent

- [13] Approving the Application risks setting an inappropriate precedent effect that could lead to further fragmentation of rural land, undermining the objectives and policies of the District Plan.
- [14] Granting consent to this proposal could signal to other landowners that similar developments will be permitted, leading to a cumulative effect of increased housing density in an area not intended for such intensive development. The non-complying status of this application reinforces the need to carefully consider the long-term policy implications, as allowing this subdivision may weaken the integrity of rural zoning provisions.

Loss of rural character

- [15] The introduction of multiple residential lots within a working rural environment is inconsistent with the purpose of rural zoning. The proposed development will result in increased residential activity, including noise, lighting, and traffic movements, which are typically associated with per-urban and rural-residential zones rather than productive rural land.
- [16] While the applicant suggests that the subdivision is designed to integrate with the landscape, the density and distribution of lots represent a clear shift away from traditional rural land use. The cumulative loss of open rural land due to subdivision activity not only affects the immediate area but also degrades the broader rural amenity of the district.

- [17] Inadequate controls are volunteered to control built form and visual effects such as heights, form, design and materials, curtilage areas, and landscaping.

Traffic and infrastructure effects

- [18] The proposal will lead to an increase in vehicle movements along Māori Point Road, a largely unsealed rural road, and its connection to State Highway 8. The increased traffic associated with 16 new residential lots has the potential to compromise road safety, particularly given the proximity of the site's main access to the highway intersection.
- [19] Dust generation from increased vehicle use on unsealed roads may also have adverse effects on nearby residents and land users, particularly the Submitter Property, as the adjacent section of Māori Point Road is largely unsealed.

Impact of Reverse Sensitivity

- [20] While the Application sits within LUC-4 land, it has important productive qualities that are protected in the District Plan from incremental lifestyle subdivision and development. The Application is also likely to adversely affect adjacent neighbouring rural production uses, other enterprises which rely on the rural land resources, and existing use rights by way of introducing reverse sensitivity issues and incompatible land uses. Further information needs to be provided in terms of effects on productivity within the Site as well as adjacent land, and revised conditions as to reverse sensitivity matters.
- [21] Allowing this subdivision could encourage further fragmentation of rural properties, making it more difficult to sustain larger-scale farming operations in the area. Protecting rural land from unnecessary subdivision is essential to maintaining the long-term viability of the district's rural economy.

Relief sought

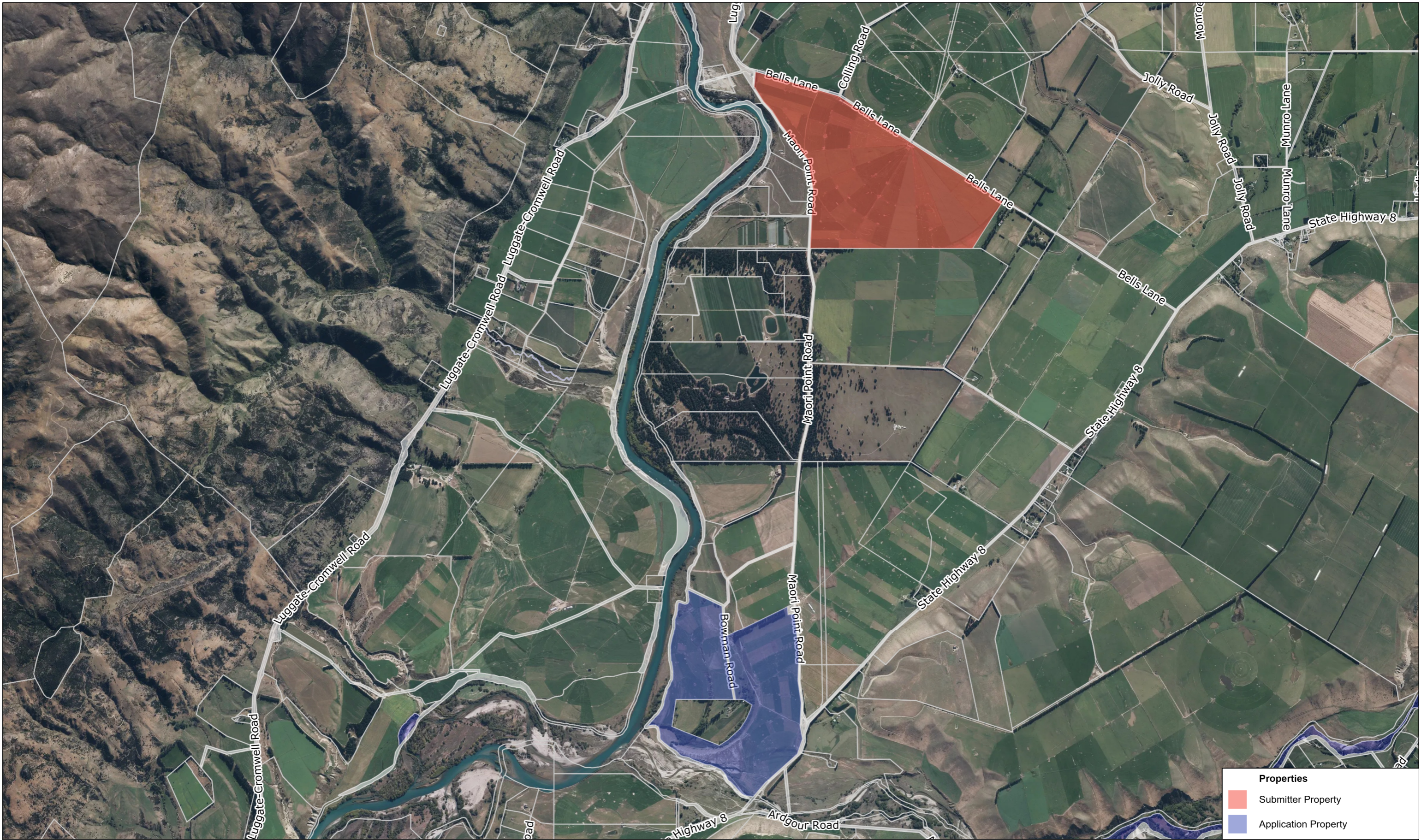
[22] The Submitter seeks that the Application be declined in its entirety.

[23] The Submitter also seeks such other relief as may be required to give effect to this submission, including alternative, consequential or necessary amendments to the Application that address the matters and concerns raised by the Submitter, and to promote the sustainable management of resources and achieve the objective and policies of the District Plan and the purpose of the Act.

Dated 14 February 2024



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R E M Hill / B A G Russell
Counsel for the Submitter



Properties

- Submitter Property
- Application Property

Map Prepared



RC230328 Properties

DISCLAIMER: This map/plan is illustrative only and all information should be independently verified on site before taking any action. Whilst due care has been taken, Grip gives no warranty as to the accuracy and plan completeness of any information on this map/plan and accepts no liability for any error, omission or use of the information.

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