

Fern Bradly

From: Duncan White <Duncan.White@ppgroup.co.nz>
Sent: Wednesday, 20 September 2023 11:29 am
To: District Plan
Subject: [PPG-W7054] Plan Change 19: Comments on s42a Reply Report on Behalf of Brian DeGeest (C985)
Attachments: PC19 Comments De Geest (submission 21).pdf

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Morning Tarryn,

Please find attached comments on the section 42a reply report behalf of Brian De Geest (submitter 21). Further comments on behalf of Sew Hoy and Heritage Properties Ltd (submitter 51) will follow in a separate message.

Regards

Duncan White

Planner
Principal

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From: District Plan <DistrictPlan@codc.govt.nz>
Sent: Wednesday, September 13, 2023 2:13 PM

To: District Plan <DistrictPlan@codc.govt.nz>

Subject: Plan Change 19

Afternoon

Section 42a reply report is available on the Lets Talk platform [Plan Change 19 - Residential Zoning | Let's Talk Central Otago \(codc.govt.nz\)](#)

Any comments can be made to districtplan@codc.govt.nz by Wednesday the 20th September
thanks

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**BEFORE THE HEARINGS PANEL
FOR THE CENTRAL OTAGO DISTRICT COUNCIL**

IN THE MATTER of the Resource Management Act 1991

AND

**IN THE MATTER of the Central Otago District Plan – Plan
Change 19**

Comments on Section 42a Reply

Duncan Lawrence White

On behalf of Brian De Geest (#21)

20 September 2023

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Introduction

- [1] My name is Duncan Lawrence White. I hold the qualifications of a Bachelor of Science in Geography, a Diploma for Graduates, and a Post Graduate Diploma in Science. Both of the latter two qualifications are in Land Planning and Development. These qualifications are all from the University of Otago.
- [2] I have 21 years of experience as a planner. This experience includes seven years with the Manukau City Council, made up of three years as a subdivision officer processing subdivision resource consent applications followed by four years as an environmental policy planner undertaking district plan changes, policy development and the acquisition of reserves. For the past 14 years I have lived in Wānaka and worked as a planner for Paterson Pitts Group (Paterson Pitts). Paterson Pitts is a land development consultancy that undertakes a variety of rural and urban subdivision, resource consent applications and plan change work from six offices around Otago (including Cromwell and Alexandra in Central Otago District, Queenstown and Wanaka in Queenstown Lakes District and Dunedin for coastal Otago).
- [3] Submissions and evidence on behalf of clients in relation to PC19 were prepared by Rachael Law under my supervision. Rachael has subsequently left Paterson Pitts so I have prepared the comments below.

Scope of Comments

- [4] These comments have been prepared on behalf of Brian DeGeest (submitter #21) in relation to the Section 42A Report: Plan Change 19 - Residential Chapter Provisions – Reply Report.
- [5] The De Geest submission sought that Lot 1 DP 23948 be rezoned to Medium Density Residential (MRZ) from Large Lot Residential zone (LLRZ) as proposed in the notified version of PC19. The reporting planner in the Reply Report recommends (at para 143) that all the North Cromwell Area (with the exception of the Wooing Tree) be rezoned to LLRZ. The reporting planner (at para 139) also recommends that the subject site be rezoned to LLRZ Precinct 1 (1,000m² minimum lot size).
- [6] I agree with the comments (in para 135) of the Reply Report that the North Cromwell area is predominantly residential in character and consequently that a

residential zone (rather than a rural residential zone) is appropriate. I also agree that the fundamental question (also from para 135) for this area “... *is what zone, including density, is most appropriate to apply to this area...*”? The comments in the following paragraphs provide material for consideration of this issue. These comments also cover Comprehensive Residential Development as discussed in paras 66 – 72 of the Reply Report.

North Cromwell Zoning

- [7] Submissions in the North Cromwell area have sought a variety of zonings for this area. Zonings are a planning technique to control uses of land to provide the most appropriate use of land for the long-term. It is therefore important at the rezoning stage to understand long-term growth patterns, what these will mean for housing availability and then ensure that the zones proposed provide for that growth or preserve potential for foreseeable future needs.
- [8] In the case of Cromwell there is a clear need to supply land for residential growth and this growth is unlikely to change significantly in the future, subject to standard market conditions. This means that it is appropriate to make zoning decisions that provide for future growth, even if this means changes to the amenity and character of areas. This means providing for zonings or densities in advance of demand and in some cases before residents are comfortable with the changes.
- [9] The need for infrastructure planning (generally a 3 - 10 year horizon) and housing lifecycles (typically 40 – 50 years) means that zones identified now will likely remain in place for the foreseeable future. That foreseeable future includes significant residential growth that will continue and possibly increase due to significant projects in this and neighbouring districts. This growth will mean that Cromwell will qualify as a Tier 3 urban environment within the life of PC19 zonings. It is therefore sensible to provide zonings through PC19 that enable and control the form and extent of that future growth.
- [10] It is also important that zonings are correct in the long-term for infrastructure planning. Infrastructure planning is based around future demand which is dependent on the form and density of development. It is important given the cost of infrastructure to identify the form and density of development well in advance of development so the infrastructure can be located and sized correctly to service

future demand. Accurate long-term planning can avoid the costs associated with upgrading infrastructure to support future density increases.

- [11] Another reason to get the planning densities correct in the district plan as early as possible is that it is easier to develop larger sites in an integrated and comprehensive manner and so provide yields and amenity outcomes that are consistent with district plan outcomes. Conversely, as sites get smaller there are increased constraints (such as property boundaries, existing buildings, service constraints) that limit yield and increase development costs.
- [12] One of the reasons that the Reply Report (para 140) considers this site to not be appropriate for MRZ is the walkable distance from key community facilities. I note that commercial activities are now being constructed in the Wooing Tree development. I also note that the underpass under SH8B is now operational and enables a shorter and more direct route between both these sites and the Cromwell Mall, without the perceived barrier of SH8B for pedestrians and cyclists.
- [13] For all these reasons the submissions sought that this site be rezoned to MRZ and for the same reasons this zoning is still considered appropriate. However, should the commissioners be minded to there is the option of zoning both sites to LRZ as this enables some residential density to satisfy future demand while still providing a level of amenity closer to that of neighbouring properties.
- [14] Given the proximity of the North Cromwell area to the Cromwell town centre it makes more sense for this to be upzoned to provide for increased residential density within an existing urban zoned area. This is also consistent with the amenity of the recently developed Wooing Tree area and provides for the likely future residential demand better than LLRZ, even with the recommended Comprehensive Residential Development provisions.

Comprehensive Residential Development

- [15] The intention of the comprehensive residential development framework discussed in paras 66 – 73 is supported, however in the case both submission sites were rezoned to LLRZ would not be effective as it provides for a density lower than proposed in the LLRZ Precinct 1 (1,000m² minimum) and the open space provisions are onerous and do not take into account the significant areas of open space that are already existing and that Council may have a preference not to take additional land for reserves in these locations.



Signed Duncan White

Dated 20 September 2023