

Fern Bradly

From: Julie Watson <njwatsonnz@gmail.com>
Sent: Wednesday, 20 September 2023 8:34 am
To: District Plan
Cc: Jindrich Fluksa; Harvey Perkins
Subject: Fwd: Response to s42 Reply Report
Attachments: Central Otago District Council Response on Reply Report Final.pdf

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Hello Again

Please note this response is also made on behalf of Brigid and Jason Short of 22 Domain Road who are also submitters on Plan Change 19.

Thanks

Niall Watson

Begin forwarded message:

From: Julie Watson <njwatsonnz@gmail.com>
Subject: Response to s42 Reply Report
Date: 19 September 2023 at 8:09:34 PM NZST
To: District Plan <districtplan@codc.govt.nz>

Please find attached a response to the s42A Reply Report

Kind regards

Niall Watson

Response to Plan Change 19 s42a Reply Report

Thank you for the opportunity to comment on the s42a Reply Report which addresses issues raised in the planning process so far and either confirms the planner's advice in the original report or amends that advice. Our comments are as follows:

1. Inconsistency between the Cromwell Master Plan and Plan Change 19 in respect of Bannockburn's residential zone boundary.

The Master Plan signals no change in Bannockburn's residential zone boundary but Plan Change 19 signals an expansion to include the Domain Road Vineyard area simply in response to an approach from the landholder.

2. Lack of Spatial Planning for Bannockburn.

The absence to date of any strategic spatial planning for Bannockburn itself is a major problem with the Plan Change 19 process. That absence is recognised in the Reply Report in a number of places (paragraphs 128 and 130 for example) but these references are not drawn together in a definitive recommendation. Instead, the Reply Report persists in giving the Hearing Panel two options - conduct a spatial planning exercise or crash ahead and rezone the Domain Road Vineyard as residential.

The desirability of undertaking a spatial planning exercise given Section 3.4 of the Cromwell Master Plan's significant identification of landscape, heritage, tourism, rural and allied values in and around the Bannockburn settlement is obvious. In this respect, consideration of the following is required:

- Protecting the high amenity landscapes of Bannockburn. This should include wine landscapes as part of Central Otago District's identified tourism product as discussed in the District Council's Central Otago Tourism Strategy 2018-2028, pages 9 & 18. It should also include consideration of the many heritage landscape features of Bannockburn and its immediate hinterland that are identified as important by the Department of Conservation, Heritage New Zealand, the Otago Goldfields Heritage Trust and indirectly by the Central Otago District Council on pages 25 & 26 of its Tourism Strategy.
- Identifying the decision-making criteria used or to be used for any expansion of the Bannockburn residential zone, particularly in light of the other possible options for expansion noted in the Reply Report's paragraphs 111, 117, 127, 130.
- Giving weight to protection of high value agricultural and horticultural land in considering all residential zone expansion options either by applying the National Policy Statement on Highly Productive Land or applying the Master Plan's priorities in respect of productive land.

We believe it is reputationally important for the Central Otago District Council to be seen to be giving weight to high value agricultural and horticultural land in an even-handed manner with all expansion options.

3. Characterisation of Domain Road Vineyard

We strongly disagree with the views expressed in the Reply Report (paragraph 89) justifying the Domain Road Vineyard residential expansion. The report says the Vineyard is ... 'a logical expansion of the township' because it is surrounded on three sides by housing. We note that the Templar Hill residential development to the north of the vineyard is very small and restricted to four defined building platforms at the end of Gibson Road, sited to protect identified landscape values and largely exclude visibility from Domain, Hall and Felton roads. In these terms, the vineyard can hardly be said to be surrounded on three sides by housing, as indicated in the Reply Report.

In reality, the Vineyard is surrounded by the Bannockburn Domain, a few houses on the northern side of Domain Road, Domain Road itself and Gibson Road, a corner of the Department of Conservation's Sluicings Reserve, the northern Domain Road Vineyard batter and the largely residentially empty and/or vineyard land on the hill between the Domain Road Vineyard and the Mt Difficulty Vineyard which runs up from Felton Road. Talk of housing on three sides suggests a very intensive urban scene. In fact, the current landscape is extensive, open and rural residential, and has been thus since before the development of the Vineyard, which seems not to have impeded its establishment, growth and operation.

We therefore disagree with point 88 of the Reply Report which relates the presentation to the Hearing Panel by Graeme Crosbie (#177) 'who supports Domain Road Vineyard being zoned LLRZ' and 'emphasised the largely urban surrounding of the site, and the impact of this on vineyard operations.' In making our disagreement clear, we cite the submissions to the Hearing Panel (p. 28 of the Reply Report) from Bannockburn residents, some from Domain Road, that the Vineyard and its low impact organic operation contributes significantly to the amenity, landscape values and rural character identified in the Cromwell Master Plan for residents and visitors alike. The residents enjoy living near the Vineyard and watching its day-to-day operations. Over the life of the Vineyard, they have had no indication from its owners that their residence near the Vineyard has in any way been a problem. They believe that there is no problem.

We agree with the Reply Report's alternative view in the same paragraph that these amenity, landscape and rural character values are important and that the site has not yet been considered as part of a spatial planning exercise.

We also note that there has been no landscape assessment of the change in zoning for the Domain Road Vineyard area. This is a major information shortfall. We

consider that the expert landscape evidence of Ben Espie (paragraph 55) for S. Davies and relating generally to Bannockburn is very relevant. Mr Espie says:

Bannockburn township has the character of an informal rural town. Older developed sites generally feature smaller residential buildings of a cottage or batch (sic) type of character and scale, leaving ample open space. More recently developed sites (within perhaps the last 10 or 15 years) generally feature larger dwellings of a rural residential type of character. This somewhat eclectic mix is part of the town's current character. Another unusual and defining aspect of Bannockburn's character is the mix of productive land use (viticulture and horticulture) coming right into the residential area. This creates something of a patchwork effect with broken edges to the residential pattern, creating a visually pleasant, green connection between the residential occupation of the area and the productive use of land.

Finally, we are concerned that the Vineyard area was originally included in Plan Change 19 primarily because of discussions between the landholder and the Council. That is not an appropriate criterion for assessment of suitability for changes in zoning.

4. Pedestrian Connectivity

The Reply Report gives no consideration to the value of Domain Road as a walkway connection. We wonder whether we've been clear enough about this issue in our prior submissions. Our point is that Domain Road is already an unofficial rural walkway, providing connection between the centre of Bannockburn, the Domain, Gibson Road and the Sluicings Reserve, Felton Road, Hall Road and indeed Stewart Town via Hall Road with potential for enhancement. Domain Road does not have footpaths and locals and visitors wander freely up the middle of the road chatting and often walking with their children and their dogs. The pace of life in Bannockburn and relatively limited vehicular traffic make this possible. This value which is consistent with the Cromwell Master Plan should be recognised in the Plan Change 19 process.

5. Lot Size

The Reply Report proposes a reduction in the minimum lot size proposed in PC19 as notified from 2000m² back to 1500 m² because some submitters argued for a 1000m² minimum lot size.

We assume the 2000m² lot size in the notified plan change reflected community input on the Cromwell Master Plan and question whether the change should be done without consideration of other controls such as roading setbacks and side yard requirements. For example, we question whether a side yard requirement of 3 metres is adequate to promote the open form of development intended through in the RRA(4) zoning.

We recommend that discussion about lot size should be included in a spatial planning exercise for Bannockburn.

6. Meeting Housing Demand

We strongly agree with the Reply Report's view (paragraph 120) that the Council is not obliged to meet a projected shortfall in housing capacity in Bannockburn. That can be met through projected surpluses in housing capacity elsewhere and so implement the Master Plan's aim of consolidating growth in Cromwell.

This response is made on behalf of Harvey Perkins and Judith Miller (Perkins/Miller Family Trust, 35 Domain Road, Bannockburn), Niall and Julie Watson (122 Pearson Road, Cromwell) and Robyn Fluksova and Jindrich Fluksa (24 Domain Road, Bannockburn).

19 September 2023