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Central Otago District Plan

Plan Change 19 – Residential Chapter Provisions

Section 42A Report – Report on Submissions and Further Submissions PART 2 (Zoning Requests)

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Abbreviations used in this report:

Abbreviation	Full Text
BRA	Business Resource Area
CODP or Plan	Central Otago District Plan
Council	Central Otago District Council
FGO	Future Growth Overlay
LLRZ	Large Lot Residential Zone
LRZ	Low Density Residential Zone
MHUD	Ministry of Housing and Urban Development
MRZ	Medium Density Residential Zone
NES-CS	Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011
NP Standards	National Planning Standards
NPS-HPL	National Policy Statement for Highly Productive Land 2022
NPS-UD	National Policy Statement on Urban Development 2020
PC19	Proposed Plan Change 19 to the Central Otago District Plan
RRA	Residential Resource Area
RuRRA	Rural Residential Resource Area
RMA	Resource Management Act 1991
SAL	Significant Amenity Landscape
s32 Report	Plan Change 19 – Residential Chapter Provisions, Section 32 Evaluation Report

1. Purpose of Report

1. This report is prepared under s42A of the RMA in relation to Plan Change 19 - Residential Chapter Provisions (PC19) to the Central Otago District Plan (CODP). The purpose of this report is to provide the Hearing Panel with a summary and analysis of the submissions received on this plan change and to make recommendations in response to those submissions, to assist the Hearing Panel in evaluating and deciding on the submissions. This report is the second of two reports and relates to submissions made on the application of zones.
2. This report should be read in conjunction with the s42A Report prepared by Ms Julie Muir in relation to water and wastewater servicing matters.
3. The conclusions reached and recommendations made in this report are not binding on the Hearing Panel. It should not be assumed that the Hearing Panel will reach the same conclusions having considered all the information in the submissions and the evidence to be brought before them, by the submitters.

2. Qualifications and Experience

4. My name is Elizabeth (Liz) Jane White. I am an independent planning consultant, based in Christchurch. I hold a Master of Resource and Environmental Planning with First Class Honours from Massey University and a Bachelor of Arts with Honours from Canterbury University. I am a full member of the New Zealand Planning Institute.
5. I have over 15 years' planning experience working in both local government and the private sector. My experience includes both regional and district plan development, including the preparation of plan provisions and accompanying s32 evaluation reports, and preparing and presenting s42A reports. I also have experience undertaking policy analysis and preparing submissions for clients on various RMA documents, and preparing and processing resource consent applications and notices of requirements for territorial authorities. I was engaged by Central Otago District Council to assist with the preparation of proposed Plan Change 19 (PC19), and prepared the PC19 provisions and s32 report.
6. Although this is a Council hearing, I confirm that I have read the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note and that I have complied with it when preparing this report. I have also read and am familiar with the Resource Management Law Association / New Zealand Planning Institute "Role of Expert Planning Witnesses" paper. I confirm that I have considered all the material facts that I am aware of that might alter or detract from the opinions that I express, and that this evidence is within my area of expertise, except where I state that I am relying on the evidence of another person. Having reviewed the submitters and further submitters relevant to this topic I advise there are no conflicts of interest that would impede me from providing independent advice to the Hearings Panel.

3. Scope and Format of Report

7. This report considers the submissions and further submissions that were received in relation to PC19 which support, or seek changes to the zoning of specific areas. It includes recommendations to either retain the zoning as notified in PC19, or to amend the zoning. All recommended zone changes are listed in **Appendix 1** to this Report.
8. The assessment of submissions generally follows the following format:
 - a. An outline of the relevant submission points
 - b. An analysis of those submission points
 - c. Recommendations, including any amendments to plan provisions – including mapping - and associated assessment in terms of s32AA of the RMA, where appropriate.
9. Where submissions are related, they are discussed in the same section and their analysis is similarly set out in one section.
10. Further submissions have been considered in the preparation of this report, but are generally not specifically mentioned. This is because they are, in most cases, made by primary submitters, and their support or opposition is made for the same reason as set out in their primary submission. Their subject matter is therefore canvassed in the analysis of the original submission.
11. Clause 16(2) of the RMA allows a local authority to make an amendment to a proposed plan without using a Schedule 1 process, where such an alteration is of minor effect, or may correct any minor errors. Any changes recommended under clause 16(2) are footnoted as such.

4. Plan Change Overview

Spatial Plans

12. Prior to the preparation and notification of PC19, the Council prepared Spatial Plans for Vincent and Cromwell.¹ These plans were prepared to identify the growth expected in the District over a 30 year period and set a blueprint for how such growth should be accommodated, to address residential land availability and housing affordability concerns in the District.
13. PC19 follows on from the Spatial Plans, by seeking to generally apply the residential zoning identified in the Spatial Plans, and align the zones with those required under the National Planning Standards (NP Standards), being LLRZ, LRZ and MRZ. These zones are also proposed to be applied to other residential areas of the District which the Spatial Plans do not apply to. In addition, as PC19 forms part of the wider review of the District Plan, it also proposes to make a

¹ Cromwell 'Eye to the Future' Masterplan, Spatial Framework, Stage 1: Spatial Plan, 5 June 2019; Vincent Spatial Plan, 4 April 2022.

comprehensive suite of changes to the way these residential areas are managed. These are addressed in the Part 1 Section 42A Report.

14. The townships or settlements to which each proposed residential zone applies are set out in s32 report.² The differences between the zones are predominantly to do with the anticipated densities in each, and in brief summary:
 - a. The LLRZ has the lowest density, with a greater ratio of open space than built form.
 - b. The LRZ provides for traditional suburban housing, predominantly detached houses on sections with generous on-site open space and setback from boundaries.
 - c. The MRZ provides for higher density development, in areas that are generally within a walkable distance of commercial areas or other key community facilities.

Planning for Water and Wastewater

15. The s42A Report prepared by Ms Julie Muir provides a summary of the water and wastewater servicing matters that are relevant to the Panel's consideration of submissions seeking the zoning of additional residential areas and addresses the implications of including the additional areas proposed by submitters. It provides a summary of the planning that has been undertaken in relation to water and wastewater service upgrades. Of note, it identifies that specific upgrades are planned in the Cromwell area to provide increased capacity to meet growth demand for both water and wastewater, and which are based on the population forecasts used to develop the Cromwell Spatial Plan. These are required due to existing capacity expected to be reached in parts of the network within the next few years. Similarly, it sets out upgrades that are planned in relation to the water supply and wastewater networks for Clyde and Alexandra, including to service the population densities and yield proposed in the Vincent Spatial Plan and through PC19. This evidence demonstrates that there is limited capacity for additional zoning 'over and above' that identified in the Cromwell and Vincent Spatial Plans, until such upgrades have occurred. The particular upgrades and how they relate to specific areas where rezoning is sought are detailed in Ms Muir's evidence.

5. Procedural Matters

16. PC19 was notified on 9 July 2022, with submissions closing on 2 September 2022. The summary of submission was notified on 1 December 2022, but due to a delay in the summary of submissions being uploaded to the PC19 website, the further submission period was extended slightly and closed on 20 December 2022.

6. Statutory Framework

17. The assessment under the RMA for this Plan Change includes whether:

² *Central Otago District Plan, Plan Change 19 – Residential Chapter Provisions, Section 32 Evaluation Report*, at paragraphs 8-10.

- a. it is in accordance with the Council's functions (s74(1)(a));
 - b. it is in accordance with Part 2 of the RMA (s74(1)(b));
 - c. it will give effect to any national policy statement or operative regional policy statement (s75(3)(a) and (c));
 - d. the objectives of the proposal are the most appropriate way to achieve the purpose of the RMA (s32(1)(a)); and
 - e. the provisions within the plan change are the most appropriate way to achieve the objectives of the District Plan (s32(1)(b)).
18. In addition, assessment of the plan change must also have regard to:
- a. any proposed regional policy statement, and management plans and strategies prepared under any other Acts (s74(2));
 - b. the extent to which the plan is consistent with the plans of adjacent territorial authorities (s74 (2)(c)); and
 - c. in terms of any proposed rules, the actual or potential effect on the environment of activities including, in particular, any adverse effect (s76(3)).
19. The assessment of the plan change must also take into account any relevant iwi management plan (s74(2A)).
20. Specific provisions within the RMA and in other planning documents that are relevant to PC19 are set out in the Section 32 Report.³ These documents are discussed in more detail within this report where relevant to the assessment of submission points.
21. The assessment of submission points has also been undertaken in the context of the Section 32 report prepared for PC19. All recommended amendments to provisions since the initial Section 32 evaluation was undertaken must be documented in a subsequent s32AA evaluation and this has been undertaken, where required, in this report.

7. Assessment of Submissions

Overview of Submissions

22. 171 submissions were received on PC19 and 76 further submissions.

³ *Central Otago District Plan, Plan Change 19 – Residential Chapter Provisions, Section 32 Evaluation Report*, at paragraphs 14-40.

Structure of Report

23. This report is structured on a township-by-township basis, addressing rezonings related to the same township in groups, as follows:

- Supporting submissions PC19 zonings
- General submissions relating to zoning
- Future Growth Overlays
- Alexandra
- Bannockburn
- Clyde
- Cromwell
- Lowburn
- Pisa Moorings
- Other areas

8. Supporting Submissions

24. Four submitters support all zone changes proposed.⁴ Waka Kotahi NZ Transport Agency (#9) supports areas proposed to be zoned rural to residential as they are located adjacent to existing development and largely align with Spatial Plans. Several landowners have also submitted in support of the zoning proposed for their properties. Where there are other submissions relating to the zoning of these properties, these submissions are identified in the relevant sections of this report. In two cases,⁵ landowners support the retention of Rural Resource zoning of their properties, and no submitters have sought changes to this zoning. The support of these submitters is acknowledged and no changes are recommended to the zoning of these properties.

9. General Zoning Submissions

Submissions

25. Wally Sanford (#144) notes that the residential zonings cover private, public and paper roads, reserves, schools (and other areas) and include land on the 'wrong' side of building line restrictions. They question whether this was intentional, and state that they do not think it is

⁴ #9 - Waka Kotahi NZ Transport Agency, #48 - Jean MacKenzie, #49 - Keith MacKenzie, #72 - Robyn & Lindsay Crooks.

⁵ For example, #33 - Mary & Graeme Stewart, #124 - Cromwell Motorsport Part Trust Ltd

appropriate. They also query if inclusion of these areas means the predicted yields are unrealistic.

26. Fulton Hogan (#26) opposes rezoning of Molyneaux Park Recreation Reserve and Alexandra Town Belt Recreation Reserve, as they consider that they provide important network of green spaces for recreation, and provide a buffer to Fulton Hogan's established depot from sensitive residential activities. They seek that these areas are included in Section 19.3 as Scheduled Areas for Recreation.
27. N R Murray (#36) opposes the zoning of the area below Miners Lane in Clyde as LRZ, on the basis that this area is mostly low lying flood plain and should not be zoned residential.
28. Gordon Stewart (#34) seeks that land which is outside the Building Zone Restriction line around the Doctor's Flat Basin is excluded from residential zoning.

Analysis

29. My understanding is that the zoning included in PC19 incorporates all areas that are zoned Residential Resource Area (RRA). This means that where roads, reserves, schools (and other areas) are currently zoned RRA, PC19 proposes to change the zoning to the relevant PC19 residential zone. This also includes areas which fall within an existing Building Line Restriction, but which are zoned RRA. Molyneaux Park and the Alexandra Town Belt Recreation Reserve, for example, are currently zoned RRA, and PC19 proposes to amend this to LRZ. PC19 is therefore not proposing to apply any residential zones (LLRZ, LRZ or MRZ) to areas identified by these submitters which are not already currently zoned residential, regardless of their current use or other restrictions that may apply through the wider plan framework. In particular, I note that the Operative Plan does not currently include an open space or recreation-based zone, and roads are generally zoned in accordance with the adjoining land. Application of a PC19 residential zoning to any area currently zoned RRA is necessary because the provisions applying to the RRA are proposed to be deleted, and therefore the existing zoning must be changed. In essence, the zoning is consistent with the status quo, and alternate zoning for these areas would need to be considered through a future plan change. This may include consideration of whether to apply an Open space and recreation zone to some areas, but both the zoning and zone framework applied would need to be considered and the latter is outside the scope of this plan change.
30. While I consider that adding further areas to Schedule 19.3 is outside the scope of this plan change, I note that Molyneaux Park (D7) and the Alexandra Town Belt Recreation Reserve (D21) are already designated for recreation purposes (as per Schedule 19.2) and that this is not altered by PC19. The area below Miners Lane in Clyde is also designated for recreation purposes (D56). Given the residential provisions in PC19 are not proposed to be linked to Schedule 19.3, addition of these areas to the Schedule would have no practical effect in any case. Similarly, Building Line Restrictions are controlled under Rule 12.7.7 and are not altered by PC19, regardless of the underlying zoning.

Recommendation

31. I recommend that the residential zonings applying to various areas not currently in residential use (including roads, reserves, schools etc) are retained as notified, except where specific changes are recommended in this report.

10. Future Growth Overlays

Submissions

32. Four submitters⁶ seek that all or parts of the areas identified within a Future Growth Overlay (FGO) are rezoned now. Reasons include that as PC19 is proposing rezoning, they do not agree with requiring a future plan change to rezone this land, that the advancement of infrastructure should not be held up until the zoning is changed, or that their particular sites are able to be serviced.

Analysis

33. As noted in the s32 Report, FGOs have been applied to areas which have been identified for residential development in the Vincent Spatial Plan.⁷ However, they are identified in Stages 2 and 3 of that Plan, meaning they are not considered necessary to meet short-term demand, but are intended to supply medium-long term demand. Rezoning of these areas is therefore not 'necessary' to meet demand over the life of the District Plan. However, their inclusion in the FGO signals that they are generally considered to be appropriate areas for growth in the future. One of the current constraints to development in these areas is that servicing is not yet available for these areas. Ms Muir's evidence sets out the planning that is underway in relation to servicing all areas identified in the Vincent Spatial Plan, and which is required to be addressed before these areas can be serviced. In my view, this means that it is not appropriate to rezone these areas at this time. Inclusion in the FGO does, however, allow infrastructure providers, including the Council, to start planning for servicing these areas. In this regard, I note that infrastructure can be advanced and does not have to 'wait' for the rezoning to occur.

Recommendation

34. I recommend that the zoning of the FGO overlay areas are retained.

⁶ #1 – MA & JM Bird, #108 - Michael Rooney, #126 - Christine and James Page and MB and RA Cromwell Ltd, #150 - Landpro Limited

⁷ *Central Otago District Plan, Plan Change 19 – Residential Chapter Provisions, Section 32 Evaluation Report*, at paragraph 11.

11. Alexandra

Graveyard Gully Road

Submissions

35. NR Murray (#36) opposes rezoning of those properties immediately opposite Shaky Bridge⁸ from Rural Resource Area to LLRZ, as they consider this does not protect the heritage landscape or building aspects leading up to the clock.



Analysis

36. The proposed LLRZ is identified in the Vincent Spatial Plan to allow for some further residential expansion which is seen as *“largely completing existing patterns of growth”*.⁹ The LLRZ would allow for the creation of lots down to a minimum of 2000m², which is broadly consistent with the adjoining area to the north, which is currently zoned RRA(10). These properties are also outside the identified Outstanding Natural Feature, but within an identified Significant Amenity Landscape (SAL). Subdivision within this area currently requires consideration of *“Potential for visual absorption of future built development with particular attention being given to those areas identified as outstanding natural landscapes and significant amenity landscapes on the planning maps”*.¹⁰ Different height limits to those of the remaining Rural Resource Area also

⁸ These are assumed to be 51, 65, 72, 85 Graveyard Gully Road.

⁹ Vincent Spatial Plan, 4 April 2022, page 26.

¹⁰ Rule 4.7.4(iii)

apply.¹¹ Application of the LLRZ would effectively result in no controls or considerations applying in this area. In my view this would result in a disconnect between the mapping of these areas as within the SAL and the framework applying. I am not sure if an assessment of the impacts of the development of this area from a landscape perspective was undertaken as part of the Spatial Plan process. Any such impacts would also need to be balanced against the outcomes sought through the Spatial Plan, in terms of providing for anticipated growth in defined areas. I tend to agree with the submitter that further consideration of the rezoning of this area is required. That is not to say that the zoning may not be appropriate, but I consider that specific assessment of the SAL and whether any additional provisions may be required would be prudent.

Recommendation

37. I recommend that the 51, 65, 72, 85 Graveyard Gully Road are NOT zoned LLRZ and the current Rural Resource Area zoning is retained.
38. In terms of s32AA, the costs associated with retention of the Rural Resource Area are that further opportunities for development of this area are not provided, and this will reduce the capacity provided through PC19. However, given the small size of this area, I consider this will have a relatively limited impact and is not significant enough to result in an undersupply. The benefits of the retention of the Rural Resource Area are that the values associated with the SAL will continue to be managed under the current framework. This will assist in the achievement of Objective 4.3.3.

LLRZ in North Alexandra

Submissions

39. Russell Ibbotson (#7) supports the “opening up” of Dunstan Road, consistent with the Spatial Plan, which he sees as a logical area for further development, with more intensive residential sections being appropriate, closer to the existing township. Molyneux Lifestyle Village Limited (#32) specifically supports the proposed LLRZ zoning of their properties at 38 Waldron Road and 269 Dunstan Road, which are at the northern end of the proposed LLRZ area.

¹¹ Rule 4.7.6A(f)

40. Conversely, NR Murray (#36) opposes the area proposed to be zoned LLRZ to the north of the current Alexandra urban area, on the basis that the change of zoning does not protect the productive soils of this area which does not support the NPSUD Objective 1 or 8. I note that the submitter seeks that the area is zoned Rural Resource Area, but the current zoning is Rural Residential Resource Area (RuRRA).



41. Paul & Angela Jacobson (#14) seek more specifically that 36 & 38 Hillview Road, Alexandra (shown below), which is part of this area proposed in PC19 to be zoned LLRZ, is instead zoned 'Viticultural Zone', with the existing Rural Residential zoning retained. They also seek that the LLRZ is define as "Large Lot Urban Zone". They consider that the zoning change proposed is effectively a change from rural to urban, because it would require connection to the wastewater system, but in their view the 2,000m² is large for an urban setting and small from a rural perspective. They also consider that the costs associated with loss of viticulture land has not been considered, and that the uniform density applied through the application of the LLRZ along to Waldron Road does not represent a graduation of density.



Analysis

42. Since PC19 was notified and after the close of submissions, the National Policy Statement for Highly Productive Land 2022 (NPSHPL) came into force. Of relevance to PC19, it includes restrictions on urban rezoning of highly productive land. However, the direction only applies to land zoned “general rural or rural production”. While these are different to the zone names used in the Operative Plan, as the current zoning of this area is Rural Residential, I consider it to be the equivalent of ‘Rural Lifestyle’ under the NP Standards, and therefore is not the equivalent of “general rural or rural production”. In addition, the direction in the NPS-HPL does not apply to land identified for future urban development, which by definition includes land identified in the Spatial Plans (being strategic planning documents), nor does it apply to land proposed in PC19 to be rezoned from rural to an urban or rural lifestyle zone (clause 3.5(7)). As such, it does not apply to this site and therefore the proposed zoning is not contrary to the NPS-HPL. Zoning identified through the Spatial Plan process has also been identified as necessary to provide for anticipated demand in an integrated manner. I therefore do not agree that the rezoning is contrary to the objectives of the NPSUD.
43. I note that the LLRZ is already defined as a residential zone in the NP Standards and is considered through PC19 to be an urban zone. I consider the zone framework proposed in PC19 is consistent with the description of this zone in the Standards. These Standards do not include a “Large Lot Urban Zone”, and the NP Standards do not allow for such a variation to be used. The proposed LLRZ is identified in the Vincent Spatial Plan to allow for some further infill of an existing RuRRA, noting this part of the current RuRRA is that which is closest to the current urban boundary. I accept that there are implications of the ‘upzoning’ of this area, but consider that these were generally considered through the Spatial Plan process, which seeks to provide

sufficient land to meet anticipated demand. I therefore support the proposed zoning, noting that while it allows for some infill development, it is up to individual landowners as to whether they take up this opportunity or not.

Recommendation

44. I recommend that the proposed LLRZ zoning along the north of Dunstan Road is retained, including the zoning of 36 Hillview Road, Alexandra.

Centennial Ave / Clutha Street / Ashworth Street 'Block'

Submissions

45. Hayden Lockhart (#42) seeks that higher density is provided for in the LRZ area in the Centennial Ave / Clutha Street / Ashworth Street block (refer below). The submitter notes that some sections in this area have already been subdivided, resulting in a mixed density in this area, and considers it would be *"fairer and more visually appealing to work towards a similar density"*, and consistent with the intent to have higher density closer to the centre of town.



Analysis

46. I note that the submitter's concerns could be addressed by either rezoning this area to MRZ, or through changes to the density provided under LRZ. The latter is addressed in Part 1 of the Section 42A report, which recommended reducing the LRZ minimum allotment size to 400m². This will, in my view, go some way to addressing the concern of the submitter through allowing for infill of 800-1000m² sections. I do not consider it appropriate to rezone this area MRZ to allow a higher density as this area is further away from the town centre and additional capacity is not required to meet demand in Alexandra over the next 30 years.

Recommendation

47. I recommend that the LRZ zoning of the block located between Centennial Ave / Clutha Street / Ashworth Street is retained as notified.

Alexandra Supermarket

Submissions

48. Foodstuffs (#61) seeks that 32 and 34 Kenmare Street are zoned Business Resource Area rather than LRZ, to reflect the same zoning at the rest of the New World Alexandra site, and the current commercial use of the site.



Analysis

49. While I accept that these sites are currently used for commercial purposes, I note that this has been established through a resource consent process, which has been assessed under the current residential zoning applying to this part of the overall site. Rezoning this part of the site could allow for changes to the activities undertaken in this part of the site that extend beyond those assessed through the resource consent process and could have a greater impact on the surrounding residential properties. In particular, safeguards that have been established through conditions placed on the resource consent could be circumvented by application of the Business Resource Area (BRA) provisions. No assessment has been provided in the submission of the difference between what is authorised through the resource consent and what would be authorised through a change in zoning. As a result, I do not currently support the change in zoning to BRA. I do however consider that the zoning is inconsistent with the surrounding residential zoning – being MRZ, and consider that if BRA is not applied, then MRZ would be more appropriate. This would provide for a permitted baseline of built form that reflects what is

anticipated in the surrounding area. While different to what is sought by the submitter I consider that it is within the scope of the change sought as it will provide a greater density of built form, which is closer to that anticipated under the BRA zoning.

50. For completeness I also note that in Part 1 of the Section 42A report, I have recommended changes to the non-residential activities policy to provide specific direction in relation to the expansion of any existing non-residential activity, which would provide direction for any changes that may be proposed to the activity in future.

Recommendation

51. I recommend that 32 and 34 Kenmare Street are zoned MRZ.
52. In terms of s32AA of the RMA, I consider that this zone better reflects the surrounding environment and does not result in an isolated parcel of land zoned LRZ.

MRZ in north-west

Submissions

53. LandPro (#150) question whether it is appropriate to apply the MRZ to areas in the north-west of Alexandra (refer generally below), given there are no associated commercial or mixed use areas near this area at present and consider LRZ may be more appropriate if not progressed alongside commercial development. NTP Development Holdings Ltd (#96), who owns the greenfield site proposed to be zoned MRZ in the central area shown below, supports the application of MRZ to their property.



Analysis

54. This area has been identified in the Vincent Spatial Plan as providing an opportunity for “A comprehensive, mixed-use approach to greenfield growth with a new neighbourhood centre, green corridors and small industrial area to support greenfield medium density residential

expansion.” Therefore, while there is no commercial area located near this area at present, one is anticipated as part of implementation of the Spatial Plan. PC19 only seeks to implement the residential components of the Spatial Plan and therefore the commercial zoning which is ultimately anticipated in the Spatial Plan is not proposed through PC19. While located further from the town centre, as greenfield sites, applying MRZ to this area will allow for higher density development to be developed in a comprehensive manner, rather than only through infill. Because of existing development, no such opportunity exists in a more central location. I have seen this approach to greenfield medium density development undertaken successfully in areas outside Central Otago, so I do not consider the location of the proposed MRZ to be inappropriate. The implementation of the zoning is also staged, through part of the area being within a FGO and therefore not anticipated to be developed in the short term. I also note that should this area not be zoned MRZ, reconsideration would need to be given as to where the anticipated demand could otherwise be met.

Recommendation

55. I recommend that the proposed MRZ zoning in north-west Alexandra is retained as notified.

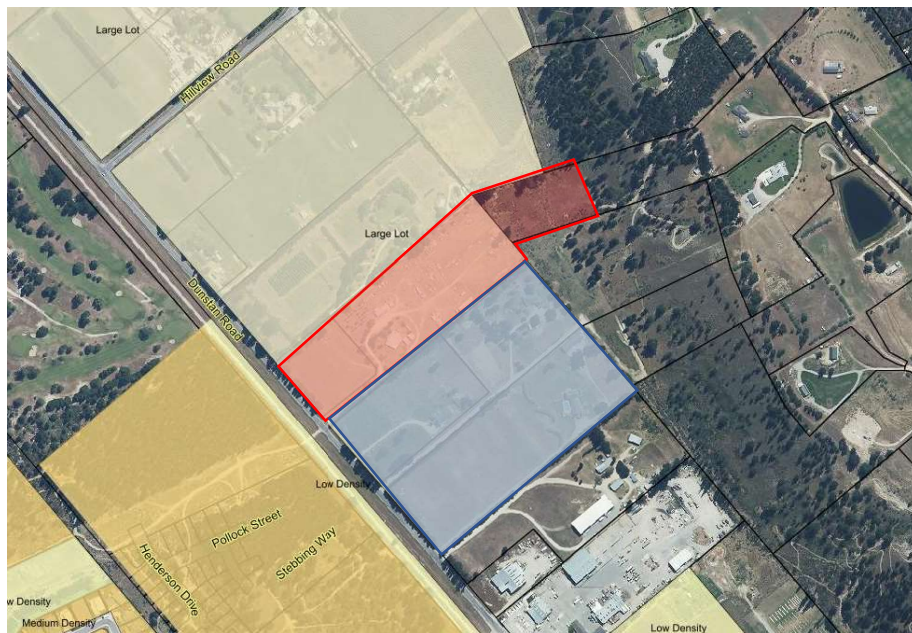
113 – 157 Dunstan Road, and part of 129 Gilligans Gully Road

Submissions

56. Shanon Garden (#139) and Chris Cameron & Carolyn Patchett (#141) seek that an approximately 4.7ha parcel of land, shown below in red, is rezoned to LLRZ, or that the full area (both the red and blue areas shown below) are zoned LRZ. As an alternate to this, they seek application of LLRZ Precinct 1 to either the red, or the red and blue sites. Aidan & Philippa Helm (#130) also seek that the rezoning of that part of 129 Gilligans Gully Road shown in red below. Reasons include:

- a. The zoning is incongruous with the MRZ proposed opposite to the south of Dunstan Road, and LRZ further to the east along Dunstan Road.
- b. The industrial zoning and potential reverse sensitivity should not be used as the boundary/reason for the change between LRZ and LLRZ.
- c. The proposed zoning is not an efficient use of the land and is not considered to be an ‘outer’ residential area as described in the LLRZ chapter.
- d. The area is well-served by public open spaces so private open space is not required and the landscape context within which the site sits supports higher density.
- e. The site is within walking and biking distance to services and amenities.
- f. Inclusion of part of 129 Gilligan’s Gully Road will create a boundary at the bottom of the existing treed face and allow for development of the flatter portion of the site which is physically separated from the balance of the site, and which would be consistent with development that has occurred to the south.

- g. That while there are infrastructure issues including roading and wastewater, there are viable options to address these issues.



57. In addition to the above, the submitters are concerned that MRZ and LRZ greenfield opportunities are only provided to large landholdings and consider that larger lots are able to be better provided on large greenfield sites than through infill/aggregation of 1-4ha lots. As such, they consider that the large landholdings may be better suited to larger development and higher density development better suited to smaller blocks north of Dunstan Road.

Analysis

58. I firstly note that the submitters have not sought changes to the zoning of any greenfield MRZ/LRZ sites. As such, I have not considered this matter further, except to note that as above, comprehensive development of greenfield sites is likely to result in higher yields than infill development.
59. With respect to rezoning the sites to LRZ or LLRZ (Precinct 1), Ms Muir identifies that this increase in intensification can be serviced for water, but cannot be serviced by wastewater at this time, and if reticulation was to be provided by the developer, this could not proceed until the wastewater treatment upgrades she identifies are completed. As such, rezoning of the site at this time is not able to be appropriately serviced in terms of wastewater. Objective 6.3.4 of the CODC, which is not altered by PC19, seeks to promote the sustainable management of the District's urban infrastructure to meet the present and reasonably foreseeable needs of the District's communities. I do not consider that the rezoning at this time would be consistent with this outcome as it would allow for a level of development that at this time is not able to be appropriately serviced.

60. In addition to this, I note that LLRZ (Precinct 1) has been applied to areas where this is generally consistent with the current zoning applied (RRA 3 and 10), to maintain the existing amenity and character. This does not apply to this area, where the proposed LLRZ is a change to the current Rural Residential zoning and therefore application of the lower density would not align with the objective (LLRZ-O3) which seeks to recognise and provide for maintenance of the amenity and character resulting from existing or anticipated development in the precinct areas.
61. Further, while accepting that the land opposite this area is proposed to be zoned MRZ, as noted earlier, the MRZ areas are greenfield sites, which provide an opportunity for higher density development to be developed in a comprehensive manner, and as such is likely to provide greater yield than what would occur through infill development alone. I do not consider the proximity of the MRZ to be sufficient reason to further 'upzone' these sites, noting the application of LLRZ already allows for greater development than currently provided for under the rural residential zoning. I also note that the MRZ is separated from this area by a large area of road reserve as well as the Rail Trail. I also consider that the industrial activity to the south of these sites does provide an appropriate 'break' between the transition from LLRZ to LRZ – but even in absence of this, I note the transition already exists at this point (between the current RRA and RuRRA zoning).
62. With respect to rezoning part of 129 Gilligans Gully Road shown in red, I tend to agree that including this in the LLRZ will result in a more logical boundary between the residential and rural residential zones which reflects the topography of the site, and which is consistent with the surrounding properties. As this area is less than 1ha, this would allow for development of 4 or 5 lots and therefore reflects more of a boundary adjustment than an extension to the zone which would otherwise result in the servicing constraints identified above. I note that the NPS-HPL does not apply to the site, because it is not currently zoned the equivalent of general rural or rural production (rural residential being more akin to a rural lifestyle zone under the NP Standards).

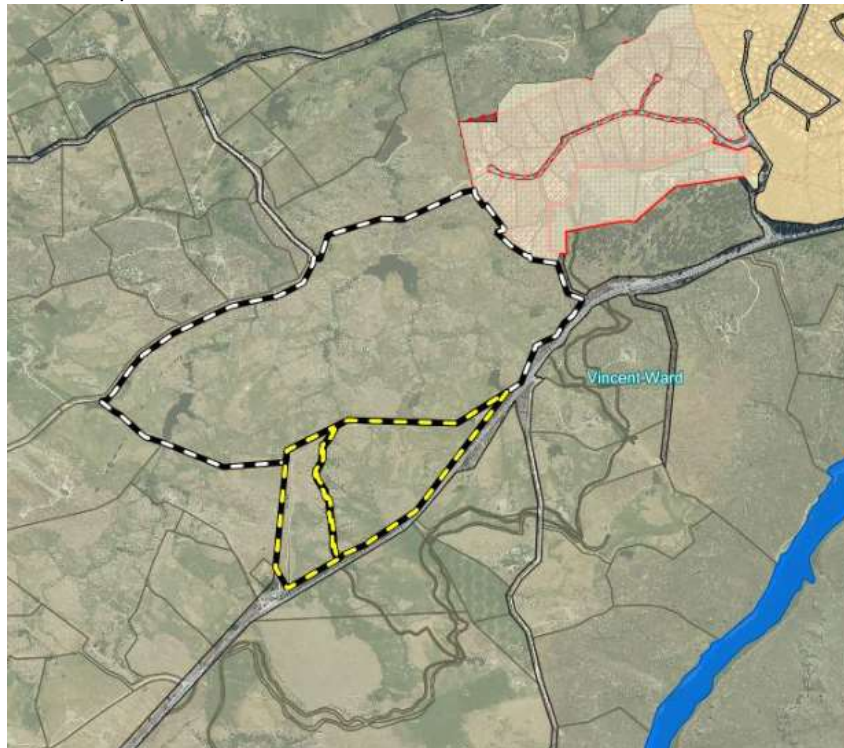
Recommendation

63. I recommend that the LLRZ zoning of 113 – 157 Dunstan Road is retained as notified.
64. I recommend that the part of 129 Gilligans Gully Road identified in submission #130 is rezoned to LLRZ.
65. In terms of s32AA of the RMA, I consider that the rezoning of this parcel of land better reflects the topography of the area and aligns with the surrounding environment. I consider that the outcomes sought for the LLRZ are more applicable to this part of the site than retention of rural residential zoning.

Alexandra-Fruitlands Road and McGregor Road

Submissions

66. Rocky Glen Ltd (#159) seek that an approximately 105ha site (refer below) is zoned LLRZ. The site is currently zoned Rural Resource Area and was not proposed to be rezoned through PC19. The submitter considers that the extension of residential zoning is a logical expansion to the “Old Golf Course Road” subdivision to the east to accommodate future growth, offering a good north aspect and unique landscape for development. They state that property is not considered to be great production land and it is discreetly located due to natural topography, screening potential development from Alexandra.



Analysis

67. The property was not identified as a growth area in the Vincent Spatial Plan. The NPS-HPL does not apply to it, as the site does not contain highly productive land. Ms Muir states that there is no capacity in the current water treatment plant to provide water to this area. She also notes that the site is above existing reservoir levels and water would need to be pumped which would result in higher operating costs. Further, the site cannot be serviced for wastewater and there is no capacity in planned wastewater treatment upgrades to service this area. The rezoning would therefore not be integrated with infrastructure and I consider it would be inconsistent with Objective 6.3.4. I also note that the yield assessment undertaken as part of the Vincent Spatial Plan demonstrated that the anticipated demand in Alexandra can be met through the supply provided in the Spatial Plan, without further land being required. Rezoning of this site is therefore not necessary to provide for demand.

68. While the submitter states that new development would be able to be incorporated into the landscape so as not to obscure views from the State Highway, I note that no landscape assessment has been provided with the submission to support this.
69. Given the servicing constraints and lack of necessity for further land to be zoned to provide for growth, I do not support the rezoning of this land.

Recommendation

70. I recommend that the Rural Resource Area zoning of the Alexandra-Fruitlands Road and McGregor Road sites are retained.

12. Bannockburn

Domain Road Vineyard

Submissions

71. A number of submitters oppose the proposed LLRZ zoning of the Domain Road Vineyard in Bannockburn (shown below).¹² In addition, Allen & Jostina Riedstra (#29) also oppose LLRZ of their property at 49 Domain Road, which is located to the south-west of the Vineyard. Conversely, Graeme Crosbie (#117) supports the proposed zoning of this area.
72. The current zoning of the site is Rural Resource Area, as shown below:



¹² #19 - James & Gillian Watt, #27 - Gordon & Jenn McGregor, #29 - Ralph Allen & Jostina Riedstra, #45 - Antony P Lingard, #52 - Perkins Miller Family Trust, #56 - Meirion & Celia Davies, #70 - James Dicey, #71 - Bridgid Anne & Jason David Short, #85 - Niall & Julie Watson, #86 - David Olds, #92 - Peter and Ngaire Grellet, #103 - Suz Allison, #104 - Britta Sonntag, #105 - Jill Marshall, #115 - Donna Hall, #119 - Jack Longton and Karen Lilian Searle, #120 - Robyn Jane Fluksova and Jindrich Fluksa, #134 - Ros and Peter Herbison, #140- Bannockburn Responsible Development Inc., #154 - Jennifer Dixon

73. The proposed zoning under PC19 is LLRZ, as shown below:



74. The reasons (in brief) for the opposition include:
- a. the impact development will have on views, particularly of existing residents;
 - b. loss of productive land;
 - c. the detrimental impact on the amenity and character of the area (including its feel as a village rather than a suburb, the heritage character of the township, and loss of open space feel);
 - d. the resulting increase in traffic and reduced safety, and consequential effects on character resulting from roading upgrades that may be required;
 - e. lack of facilities to support population increase;
 - f. increased light and noise; and
 - g. that it won't provide low cost housing for workers in area.
75. The supporting submitter considers that the site fits naturally within the boundaries of the township and states that infrastructure is already available to support the zoning.
76. Submitters generally seek that the rezoning does not occur and therefore the current RRA zoning remains in place, or they seek amendments to the framework applying, including:

- a. the extension of the current Building Line Restriction / exclusion of buildings on the elevated terrace or northern slope of the vineyard area and on Templars Hill;¹³
- b. an increase in the minimum lot size to 3000m²;¹⁴
- c. an increase in the setback required from Domain Road to 20m;¹⁵
- d. a requirement to upgrade Domain Road to address increased traffic and to include some green space/playground in the development of area;¹⁶
- e. require low-emittance and sensor lighting and require establishment of a green corridor; and/or¹⁷
- f. reinstatement of the legal boundary along the south boundary to be reinstated on the legal boundary, that excavation of the current batter along this fenceline be reinstated to current specifications for such batters, and infrastructure to service any development of the site be via the unformed legal road, not along the western boundary with 26 Boundary Road.¹⁸

77. Some submitters also seek that reconsideration is given to whether the expansion is needed, as well as to whether the township should instead be expanded to the south.¹⁹

Analysis

78. I note that the Cromwell Spatial Plan includes Bannockburn, but unlike Cromwell, does not identify any areas for future growth. I understand that the Domain Road Vineyard site was included in PC19 as a result of discussions within the landowners, and because the site 'infills' an area which is adjoined on three sides by residential zoning, and is within the area where the Council's reticulated services are available.

79. Because the land was proposed through PC19 to be zoned LLRZ, the site is not considered to contain highly productive land (under Clause 3.5(7) of the NPS-HPL) and therefore the NPS-HPL does not apply.

¹³ Including #19 - James & Gillian Watt, #27 - Gordon & Jenn McGregor, #34 - Gordon Stewart, #47 - Roger Evans Family Trust, #120 - Robyn Jane Fluksova and Jindrich Fluksa

¹⁴ Including #52 - Perkins Miller Family Trust, #78 - Astrid Geneblaza, #84 - Wendy Bamford and Graham Bamford, #85 - Niall & Julie Watson, #86 - David Olds, #92 - Peter and Ngaire Grellet, #97 - Jim and Diane Walton et al., #101 - Geoffrey Owen and Ingrid Janice Poole, #103 - Suz Allison, #105 - Jill Marshall, #119 - Jack Longton and Karen Lilian Searle, #120 - Robyn Jane Fluksova and Jindrich Fluksa

¹⁵ #52 - Perkins Miller Family Trust, #78 - Astrid Geneblaza, #84 - Wendy Bamford and Graham Bamford, #85 - Niall & Julie Watson, #86 - David Olds, #92 - Peter and Ngaire Grellet, #97 - Jim and Diane Walton et al., #101 - Geoffrey Owen and Ingrid Janice Poole, #103 - Suz Allison, #105 - Jill Marshall, #119 - Jack Longton and Karen Lilian Searle, #120 - Robyn Jane Fluksova and Jindrich Fluksa

¹⁶ #47 - Roger Evans Family Trust

¹⁷ #120 - Robyn Jane Fluksova and Jindrich Fluksa

¹⁸ #45 - Antony P Lingard

¹⁹ Including #52 - Perkins Miller Family Trust, #85 - Niall & Julie Watson, #92 - Peter and Ngaire Grellet, #103 - Suz Allison, #105 - Jill Marshall, #119 - Jack Longton and Karen Lilian Searle

80. From an urban form perspective, the current zoning of the site is unusual, in that it is surrounded on three sides by residentially-zoned properties. The proposed application of the LLRZ would therefore 'square up' the boundary and, in my view, would consolidate the township. I further note that while the Spatial Plan does not identify this site for growth, it does seek that outlying settlements, such as Bannockburn, are primarily retained as per their existing extent, to strengthen a compact pattern of development within existing Cromwell.²⁰ I consider the inclusion of the Domain Road Vineyard site is broadly consistent with this as while the rezoning would change the location of the existing rural/urban boundary, it consolidates or 'infills' the current urban form, rather than extending the town further north (or in any other direction) than its current extent.
81. While I accept that the zoning will impact on the current views enjoyed by other residents, I note that these views are not identified or protected in the Operative Plan. Similarly, while Bannockburn may be considered to have character derived from aspects of heritage, any 'heritage character' is not identified within the Plan, such as through a heritage precinct. It is also reasonable to expect that amenity values and character will change over time, and I do not consider that the RMA, or the District Plan requires protection of the amenity derived from the current use of the site by surrounding landowners, nor the maintenance of the existing character. I also note that development of other areas which are already zoned but not yet developed could also alter the amenity values and character of the area, as would expansion of the township in an alternate direction. I therefore do not consider this to be sufficient reason not to rezone the site.
82. Ms Muir notes that planning for upgrades to the water and wastewater network serving Bannockburn are based on providing for the yields anticipated under PC19, which includes this site. The development provided under the zoning can therefore be integrated with infrastructure and as such would be consistent with the direction in Objective 6.3.4.
83. From a supply perspective, a recent yield assessment was undertaken for the Council, to provide yield calculations for PC19, to identify whether the proposed zonings would provide sufficient capacity for the forecasted demand. This is contained in **Appendix 2** and is, in effect, an update of the Cromwell Housing and Business Development Capacity Assessment, prepared in 2018 as part of the Cromwell Spatial Plan, and reflects that growth projections are now higher than they were in 2018, and that the PC19 zoning framework differs from the Spatial Plan in some instances. This recent assessment demonstrates that at a ward level, there is sufficient housing supply for the forecasted demand. However, when looking more specifically at Bannockburn Township, there is insufficient supply to meet demand. My understanding of the assessment is that the PC19 zonings are expected to provide for just over 500 dwellings, which is a shortfall of around 200 under the medium forecasted demand and 300 under the high forecasted demand. This shortfall would therefore increase if the Domain Road Vineyard is not rezoned. As noted in the yield assessment, there is a large surplus in Cromwell township, which is *"expected to cover most of the deficit seen in Bannockburn, with large housing supply driving a*

²⁰ Page 23.

shift to greater growth rates within Cromwell township.” Not rezoning the Vineyard site would therefore have a further impact on the need for demand to be met within Cromwell Township instead of through additional supply within Bannockburn itself. However, this could be offset if other land in Bannockburn is rezoned instead, or greater intensification within the existing urban boundary is provided.

84. If the rezoning proposed in PC19 is approved, I note those submissions seeking additional constraints be applied. I agree with submitters that it would be appropriate to extend the Building Line Restriction across the northern portion of this site, to exclude buildings on the elevated terrace. I consider that this will assist in part in the visual effects arising from the rezoning and is consistent with the approach taken to other elevated areas within the urban boundary. I do not consider it appropriate to apply a lower density of 3000m² to this site, as this would perpetuate the existing complexity of the current District Plan, whereas the approach in PC19 is to rationalise the current differences between zones. Application of LLRZ, with a minimum density of 2000m², also ensures that development of the site is generally consistent with the existing density of development. I also do not consider it appropriate to apply a bespoke setback from Domain Road. My understanding is that the current front yard setback applying within the RRA(4) is 4.5m and therefore applying 20m to one property but continuing to apply 4.5m to others would result in an inconsistent approach to built form that I do not consider is justified by anything particular about this site.
85. With respect to traffic, I consider that whether upgrades are required is a matter that can be considered in more detail at the time of subdivision, and there are existing mechanisms in the Plan to provide for this. This is the same for the provision of green space. Provision of servicing is also a matter best considered at the time of subdivision. I also do not consider it appropriate to apply bespoke controls on lighting in relation to this site alone and consider that should restrictions be imposed this should be considered when the lighting controls in the Plan are reviewed as a whole. I also note that controls in the District Plan cannot require a landowner to alter a batter. If such work has been undertaken in contravention of the current Plan rules then this is a compliance matter and in my view not something that can be addressed through the rezoning, nor can changes to the legal boundary.
86. With respect to the property at 49 Domain Road, I note that this is currently zoned RRA(4). Application of LLRZ therefore largely aligns with the status quo. The submitter also notes that this land is protected from subdivision by a QE2 open space covenant. The zoning of the site does not override the covenant, nor does it ‘require’ the property to be further developed. Therefore, I do not consider a change to its zoning is required, given the LLRZ effectively supercedes the current zoning.

Recommendation

87. I recommend that the LLRZ zoning of 49 Domain Road is retained as notified.
88. Overall, I accept that there is a large amount of community concern with the rezoning of the Domain Road Vineyard site, which was not included in the Cromwell Spatial Plan. Balanced

against this, is that there is a lack of supply to meet demand in this Township, and this land provides a logical area to expand the town into, in an area which can be serviced, and which because of timing, is not subject to the constraints of the NPS-HPL. I therefore consider that the key decision for the Hearing Panel is whether given the latter points, it is appropriate to rezone the land at this time, or whether further consideration needs to be given to the growth options for the Township through a separate process. This is commented on further below at the end of the section of this report relating to Bannockburn.

89. If the Hearing Panel accepts the proposed LLRZ zoning of the Domain Road Vineyard, then I recommend that a Building Line Restriction is included on the northern portion of this site (on the elevated terrace). In terms of s32AA of the RMA, I consider that application of a Building Line Restriction is appropriate to assist in achieving LLRZ-O2, as restricting building in a more prominent location will assist in maintaining a predominance of open space over built form, and maintain the amenity values associated with views of and beyond this terrace.

North-east Bannockburn

Submissions

90. D J Jones Family Trust and N R Searell Family Trust (#82) seek that the area to the northeast of Bannockburn township is rezoned to enable higher density residential development, and to allow for retail, community and commercial activities. As an alternative, an indicative zoning plan is provided with the submission which seeks that the majority of the site outside the Building Line Restriction is zoned LRZ (or LLRZ but with higher densities of 1000m² minimum and 1500m² average), with a smaller area also rezoned MRZ, and a 'Medium Density Residential Commercial Precinct' applied to approximately 1.8ha, intended to provide local convenience retail and community facilities. I note that the submitter identifies that additional provisions such as objectives, policies, rules and assessment matters, as well as a structure plan to guide future development may be required to facilitate the development, but has not identified specific changes. The submitter considers that the site is appropriate for higher density development, and as it is centrally located, provides an opportunity for local convenience retail.



91. Several submitters²¹ consider that if the proposed eastern boundary of Bannockburn Township remains as proposed “beyond the end of Terrace Street”, residents and visitors to the Inlet will be able to see new housing, which in their view will undermine the rural character of the Inlet area, and create traffic effects at the Terrace Street/Bannockburn Road intersection which would also detract from the character.

Analysis

92. In terms of provision for commercial activities, I note that PC19 only relates to residential areas. I consider that the zoning of the area adjacent Bannockburn Road for local convenience retail and community facilities is better considered when the Business Resource Area framework is reviewed. I also consider that application of a commercial precinct would not align with the NP Standards, which describe the MRZ, LRZ and LLRZ as “*areas used predominantly for residential activities*”. The types of activities anticipated by the proposed commercial precinct would in my view align instead with a commercial zoning, such as a neighbourhood centre or local centre zoning and it would therefore be inconsistent with the NP Standards to apply a precinct.
93. With respect to MRZ, I note that this is applied to areas within the larger townships of Alexandra, Clyde and Cromwell, and particularly in areas that are within a walkable distance of commercial areas or other key community facilities. The density is also much higher than that currently anticipated through either the current or proposed zoning of the surrounding area and therefore would likely result in a substantial change in the character and amenity of the area. In absence of a detailed assessment (e.g. from an experienced landscape and/or urban design expert) of the impact of this, I consider that it is not appropriate to rezone this area MRZ.

²¹ #52 - Perkins Miller Family Trust, #92 - Peter and Ngaire Grellet, #103 - Suz Allison, #105 - Jill Marshall, #119 - Jack Longton and Karen Lilian Searle

94. In terms of providing for a higher density in the area outside the Building Line Restriction, because the land is currently zoned Residential Resource Area 4, and is proposed to be LLRZ in PC19, the NPS-HPL does not apply. Ms Muir identifies that the increase in density would require significant upgrading to existing water reticulation and storage capacity, as well as capacity increases in wastewater treatment. She notes that these upgrades exceed current infrastructure planning provisions for level of service and growth. Therefore, while I acknowledge that increasing density in part of this site (outside the building line restriction) could be one way to address shortfall in yield in Bannockburn, there are servicing restrictions relating to this.
95. I also consider that it would be more appropriate to consider options for intensification alongside expansion options, including how this would need to be integrated with servicing upgrades, and to allow for community involvement in determining if and how growth should be provided for. This also acknowledges that the a 'Key Move' identified in the Spatial Plan is to support growth of housing balanced with the current section sizes and retaining the character of the local streets.²² Intensification does not align with this, and therefore, in my view, reconsideration of reducing the current section sizes in this area requires further consideration (alongside other growth options). This is commented on further below at the end of the section of this report relating to Bannockburn.
96. With respect to the establishment of buildings beyond the end of Terrace Street, I note that PC19 does not propose to amend the existing Building Line Restriction, which will still apply. The effect of PC19 is simply to change the existing underlying zoning of this area from RRA4 to LLRZ, but Rule 12.7.7 will still restrict buildings being erected within the existing Building Line Restriction area. A breach of this rule will require a resource consent, with matters of discretion including consideration of effects on the natural character of water bodies and their margins; and on the safe and efficient operation of the roading network.

Recommendation

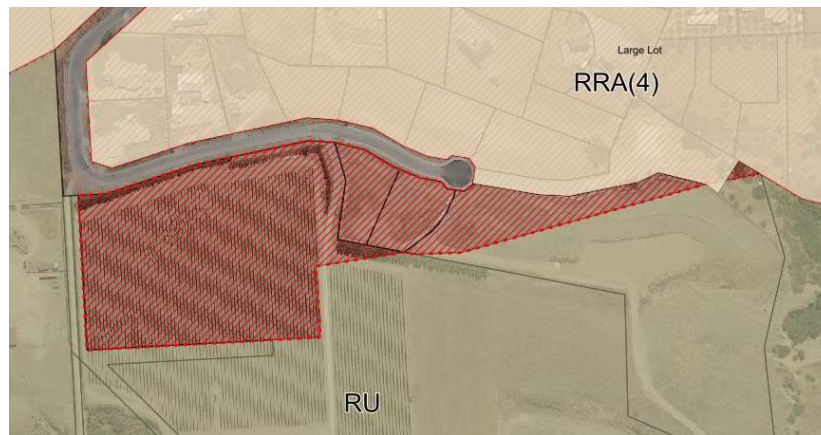
97. I recommend that the LLRZ zoning of the area in the northeast of Bannockburn Township is retained as notified.

²² Cromwell 'Eye to the Future' Masterplan, Spatial Framework, Stage 1: Spatial Plan, 5 June 2019; Vincent Spatial Plan, 4 April 2022, page 44.

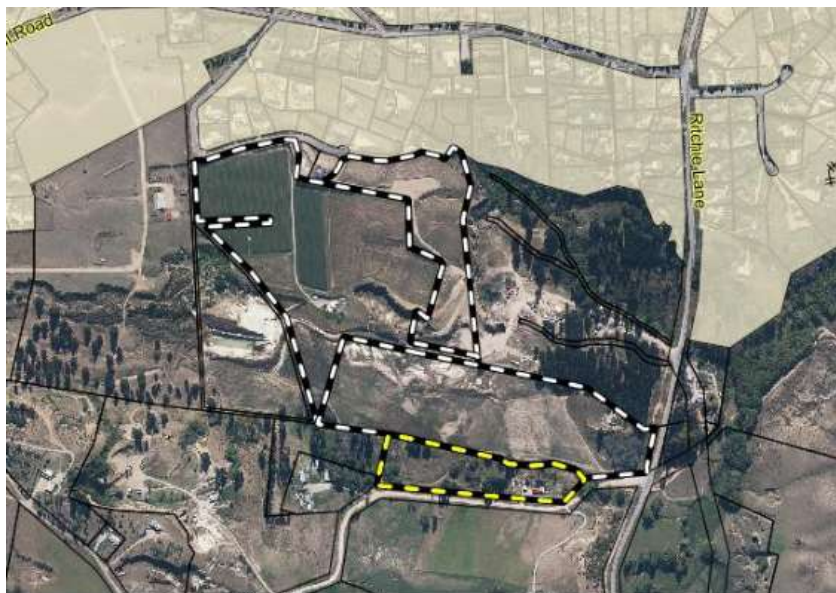
Expansions to the South and West of Bannockburn

Submissions

98. Landpro (#150) notes that there are areas off Lynn Lane that are currently zoned Residential Resource Area 4, which are not zoned LLRZ under PC19, particularly 69 Hall Road, 48 & 50 Lynn Lane. The map below shows in red, those sites which are RRA4 currently, but not included in the LLRZ.



99. N Smith & K Parsons (#100) seek that approximately 14ha on Schoolhouse Road and Hall Road is rezoned LLRZ (the full site is shown in the first figure below, and the area sought to be rezoned in the second figure). The submitter considers that extending the LLRZ boundary from Lynn Lane to Schoolhouse Road provides greater supply for growth and that Schoolhouse Road forms a clear geographic boundary to the south. They state that these landholdings are of low agricultural value and the rezoning would result in no loss of productive land within the existing Rural Resource Area.



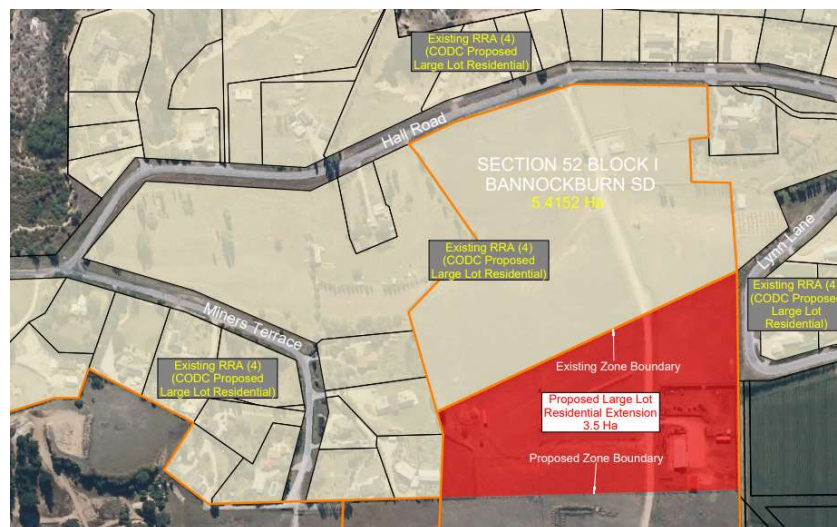


100. J Klevstul and R Klevstul and Rubicon Hall Road Limited (#163) seek that approximately 22.2ha of land to the south of Bannockburn be rezoned from Rural Resource Area to LLRZ, with a precinct applied to allow for an average allotment size of 1000m², or lower where the urban design principles outlined in a “Rural Hamlet Vision” (attached to the submission) are given effect to, and for a development area plan/structure plan to be included in the District Plan. They also note that *“purpose statement text, objectives and other methods, such as policies, rules and assessment matters”* may be required to facilitate the zoning and align subdivision with the development area plan, but do not identify the specific changes sought to the PC19 provisions. They consider that the site is an appropriate area for a relatively contiguous and logical extension of the existing Bannockburn settlement. They note that the site is subject to a scheduled activity (a gravel pit) but otherwise does not contain any overlays or features, and state that existing productive land uses and area of mining heritage will be preserved through clustering of houses. They note that the site is adjacent to existing reticulated water and

wastewater and can be serviced, and consider that there are sufficient roading connections to the local roading network.



101. C. McLeod (#135) seek that approximately 3.5ha of land at 97 Hall Road is rezoned LLRZ, as shown below (image taken from submission). This is a portion of a larger title, and would result in the new southern urban-rural boundary of the township being aligned with the properties to its west. The submitter considers this land is an appropriate area for a contiguous and logical extension of the existing Bannockburn settlement, and notes that it does not contain any overlays or features, and adjoins a site owned by the same landowner which has road frontage and water and wastewater connections.



102. S. Davies (#147) seeks that an additional area of land be rezoned Residential Resource Area 4, which they state will assist in accommodating an Environment Court decision, and further extend the urban boundary “in exchange for” rezoning an area proposed to be LLRZ to Rural Resource Area, which is used as a vineyard. I am unclear what land is referred to.

103. Harold Davidson (#127) seeks that approximately 13.8ha of land to the south-east of Bannockburn be rezoned from Rural Resource Area to LLRZ. He considers this to be a logical extension to the Bannockburn residential area, which is accessible from Hall Road (noting this is identified as a 'key road' in the Cromwell Spatial Plan), serviced by Council's reticulated water system and outside of any significant amenity landscape and not subject to a Building Line Restriction which materially affects the yield able to be realised in the other zoned parts of Bannockburn.



104. Five submitters²³ also note that the proposed zoning in Bannockburn does not allow for further development to the south of the Township, stating that housing could be placed into the land in this area in such a way that it is inconspicuous, while prohibiting buildings on ridgelines and protecting current viticulturally productive areas and heritage sites.

²³ #52 - Perkins Miller Family Trust, #92 - Peter and Ngaire Grellet, #103 - Suz Allison, #105 - Jill Marshall, #119 - Jack Longton and Karen Lilian Searle

105. Kōraki Limited and ScottScott Limited (#143) seek that land to the west of the existing township, located at the edge of (but outside) the Significant Amenity Landscape boundary, is zoned LLRZ.



106. The submitter notes that the land is accessible from Hall Road (identified as a “key route” in the Spatial Plan), is serviced by the Council’s reticulated water system, and is outside the Significant Amenity Landscape area. They consider that PC19 fails to provide adequate land for residential growth in Bannockburn despite recent demand.

Analysis

107. The area to the south and west of the existing Bannockburn township contains LUC Class 3 soils (shown within the blue lines in the diagram below). The NPS-HPL must be applied to the Class 3 areas within these sites, under Clause 3.5(7) of the NPS-HPL, as the current Rural Resource Area zoning is the equivalent of the general rural or rural production zone. LLRZ is an ‘urban zone’ under the NPS-HPL and Clause 3.6(4) directs that territorial authorities (who are not Tier 1 or Tier 2 authorities under the NPS-UD) may allow urban rezoning of highly productive land only if:

(a) the urban zoning is required to provide sufficient development capacity to meet expected demand for housing or business land in the district; and

(b) there are no other reasonably practicable and feasible options for providing the required development capacity; and

(c) the environmental, social, cultural and economic benefits of rezoning outweigh the environmental, social, cultural and economic costs associated with the loss of highly productive land for land-based primary production, taking into account both tangible and intangible values.



108. As noted earlier, a recent yield assessment was undertaken for the Council, to provide yield calculations for PC19, to identify whether the proposed zonings would provide sufficient capacity for the forecasted demand (refer **Appendix 2**). This identified that there is sufficient housing supply for the forecasted demand at a ward level, but a shortfall when considering Bannockburn Township more specifically. I also note that this shortfall would increase if the Domain Road Vineyard is not rezoned. As noted in the yield assessment, there is a large surplus in Cromwell township, which is *“expected to cover most of the deficit seen in Bannockburn, with large housing supply driving a shift to greater growth rates within Cromwell township.”*
109. In terms of the NPS-HPL, I consider that there is a tension with whether or not additional urban zoning is required in Bannockburn to provide sufficient development capacity to meet expected demand for housing or business land **“in the district”** (emphasis added). If the Hearing Panel is satisfied that this test is met by considering supply on a township basis, then I consider that the second test (*“there are no other reasonably practicable and feasible options for providing the required development capacity”*) will be met by any of the proposed areas, because any expansion to the south (or west) is into Class 3 soils, and there are topographical or other constraints with expanding to the north or east instead. I consider the third test (*“the environmental, social, cultural and economic benefits of rezoning outweigh the environmental, social, cultural and economic costs associated with the loss of highly productive land for land-based primary production, taking into account both tangible and intangible values”*) is likely to be the same or similar for all these areas, albeit this might be influenced by the extent of land-based primary production currently occurring on those parts of these sites which are LUC Class 3 soils.
110. Another key consideration is whether or not these areas are able to be serviced. As outlined in the engineering report, there are servicing constraints in relation to both water and wastewater for all of these sites. For a number of these, this would require significant upgrading to existing water reticulation and storage capacity to be undertaken, and for some, water would need to be pumped to this area which would result in higher operating costs. I consider that this precludes rezoning of any of these sites, at this time. Notwithstanding this, if the zoning of some

or all of these sites is otherwise appropriate, I consider that a Future Growth Overlay could be applied. This would signal that there are servicing constraints that need to be addressed, but that subject to these being resolved, the rezoning is otherwise appropriate.

111. From an urban form perspective, I generally consider the sites to the south to be a logical area for an expansion to the boundary of the Township. I consider that zoning which ‘infills’ or provides a consistent urban/rural boundary to the south is most preferable, and that in general, zoning further towards the west is less preferable as it extends the township further in this direction rather than consolidating around the existing urban area. I also note, in relation to the the Kōraki Limited and ScottScott Limited site, that this area is not contiguous with the current urban area and therefore rezoning this site would result in a separate area of urban zoning. Given the large amount of land sought to be rezoned, even with the anticipated shortfall, zoning all the land sought is likely to be more than necessary to meet the demand and therefore further consideration would need to be given to how much land should be rezoned, and therefore which of the land parcels are the “best” location for such growth.
112. I also note that the Spatial Plan did not specifically identify any additional areas for growth in Bannockburn, seeking that outlying settlements, such as Bannockburn, are primarily retained as per their existing extent, to strengthen a compact pattern of development within existing Cromwell.²⁴ ‘Key Moves’ identified relate to providing a better ‘heart’, in terms of commercial development and community spaces, as well as supporting growth of housing balanced with the current section sizes and retaining the character of the local streets.²⁵ A key question for the Hearing Panel is therefore whether additional growth should be provided for in this Township.
113. In relation to J Klevstul and R Klevstul and Rubicon Hall Road Limited (#163), it is not clear to me how the Rural Hamlet – Vision would be incorporated into the District Plan, nor how it would be implemented through the Plan provisions. In my experience, such documents are not included in district plans. In particular, while an indicative development plan is included in the submission, it is not clear what rules would apply to the different areas. In my experience, while development plans are commonly used in district plans to guide development, the different areas which are delineated within them are clearly linked through to the rule framework applying. In this instance, if the entirety of the site is zoned LLRZ, there would be no difference in the management of different parts delineated in the development plan. While the submitter indicates that additional provisions might be necessary, none have been suggested, so it is not clear to me how the site is anticipated to be managed under the PC19 framework. For the avoidance of doubt, I am not opposed to the concept of development plan being used to manage development of a site, particularly where it can be used to deliver better environmental outcomes than a ‘standard’ zoning and subdivision (e.g. clustering development while setting

²⁴ Cromwell ‘Eye to the Future’ Masterplan, Spatial Framework, Stage 1: Spatial Plan, 5 June 2019; Vincent Spatial Plan, 4 April 2022, page 23.

²⁵ Cromwell ‘Eye to the Future’ Masterplan, Spatial Framework, Stage 1: Spatial Plan, 5 June 2019; Vincent Spatial Plan, 4 April 2022, page 44.

aside areas to allow for ecological restoration). My concern in this instance is the lack of detail of how this is to be achieved through the plan framework.

114. Given their size, I agree that 48 & 50 Lynn Lane should be included in LLRZ. As they are currently zoned RRA(4), the NPS-HPL does not apply to them. As the parts of 69 Hall Road which are currently zoned RRA4 are part of larger landholding and the eastern portion, in particular, does not appear to follow any particular topographical or other boundary, I consider there is some logic in the zone boundary to follow the cadastral boundaries of these sites, as proposed in PC19. However, given the identified shortfall in supply in Bannockburn, and given the NPS-HPL does not apply, I consider it more appropriate to retain the current zone boundary, i.e. include those areas zoned RRA(4) in the LLRZ zone.

Recommendation

115. I recommend that 48 & 50 Lynn Lane, and those parts of 69 Hall Road which are currently zoned RRA(4), are zoned LLRZ. In terms of s32AA of the RMA, I consider that application of this zoning better reflects the existing and intended development under the current zoning, and the costs and benefits do not alter from those currently applying under the RRA(4) zoning.
116. I recommend that other land to the south and west of the Township is retained as Rural Resource Area at this time. (Reference should also be made to the 'Overall Conclusion on Bannockburn Zoning' section below).

'Footprint' of Bannockburn

117. Several submitters²⁶ state opposition to the overall "residential footprint" of Bannockburn, including that they consider that there is not enough reserve space, and they consider that connections and new reserve spaces should be required now and addressed at the same time as zoning.

Analysis

118. As noted earlier, the Operative Plan does not currently include any open space or recreation-based zones, with these areas tending to have a residential zoning. As PC19 does not propose such zonings, I do not consider it within the scope of PC19 to identify reserve spaces. I note that in any case, consideration of the provision of connections and reserves is provided for through the matters of discretion applying to any proposed subdivision, including "*The provision of or contribution to the open space and recreational needs of the community*" and "*Provision for pedestrian and cyclist movement, including the provision of, or connection to, walkways and cycleways*". There are also other mechanisms available to the Council to acquire reserve land or easements that sit outside the District Plan. I therefore do not consider it appropriate for PC19 to be amended to in some way identify specific areas for reserves.

²⁶ #52 - Perkins Miller Family Trust, #92 - Peter and Ngaire Grellet, #103 - Suz Allison, #105 - Jill Marshall, #119 - Jack Longton and Karen Lilian Searle

Recommendation

119. I do not recommend any changes to the identify specific areas for public walkway connections or reserves in Bannockburn.

Building Line Restriction

Submissions

120. Five submitters²⁷ support the retention of the Building Line Restriction applying to areas within the Bannockburn Township. Mason and Julie Stretch (#74) seek that the current Building Line Restriction is extended beyond the village basin of Bannockburn, *“rather than reverting to residential zoning beyond the Bannockburn basin.”* The submitter considers that clearly defended no build areas beyond the basin will ensure the special landscape views of Bannockburn are retained.

Analysis

121. I note that no submitters have sought changes to the Building Line Restriction, and noting the support from the above submitters, I recommend the Building Line Restriction is retained. In terms of extending the Building Line Restriction, although it is not clear exactly what area the submitter is seeking this over, my assumption is that it is outside the proposed residential areas. As such I consider that it is outside the scope of PC19 and would need to be considered when the relevant zone provisions (e.g. Rural Resource Area) are reviewed.

Recommendation

122. I recommend that the current Building Line Restriction applying to areas within the Bannockburn Township is retained.

Overall Conclusion on Bannockburn Zoning

123. While I consider that the servicing constraints mean that additional land to the south and west of the Township should not be rezoned through PC19, given the shortfall of land in Bannockburn, I consider that the Council may wish to revisit the zoning of land in Bannockburn, for example through a further township-specific Spatial Planning exercise. This could include reconsideration of the zoning of Domain Road Vineyard site, if the Hearing Panel determine not to rezone it at this time.
124. This would allow for more detailed consideration, and community input into, what areas are rezoned for residential and potentially commercial development, including consideration of whether higher density development is appropriate in some areas. It would also more specifically consider the likely amount of demand and ensure an appropriate amount of supply, and well as allowing for integration with infrastructure planning that would be required to overcome the current servicing limitations. Such an exercise would also ensure proper

²⁷ #46 - Charles & Nicola Hughes, #70 - James Dicey, #74 - Mason and Julie Stretch, #86 - David Olds, #140- Bannockburn Responsible Development Inc.

consideration and application of the direction in the NPS-HPL, in terms of: clearly determining the development capacity required to meet expected demand and how this is provided for; considering a range of options for providing the required development capacity, to determine which are the most practicable and feasible options; and considering the benefits of rezoning options against the costs associated with the loss of highly productive land for land-based primary production.

125. While this is beyond the matters for the Hearing Panel to determine through PC19, it may wish to make a separate recommendation to the Council in relation to this.

13. Clyde

MRZ

Submissions

126. Four submitters²⁸ oppose the application of MRZ within Clyde, either within the heritage precinct, or in the township as a whole. They seek that the current density is retained (either in the heritage precinct or the township as a whole), or that a “heritage plan” is finalised before any zone changes are made. Their concern is that higher density development could compromise the character and heritage values of the Township. Simon Thwaites (#28) supports the proposed MRZ zoning of his property at 6 Blythe Street, which is within the MRZ and the heritage precinct.

Analysis

127. The application of MRZ within Clyde Township, including within the heritage precinct, has been subject to advice from both heritage and urban design experts. This identified that higher density development (at 200m², as proposed through the MRZ framework,) can be appropriately designed to complement the heritage values, subject to a lower height limit being applied in this Township than is applied in Cromwell and Alexandra. The Medium Density Residential Design Guide also includes a specific section on Clyde.²⁹ The Council has also notified Plan Change 20 – Heritage, which proposes minor changes to Section 11 (Heritage Precincts) of the District Plan, which are intended to provide guidance to help better align the matters of discretion and information requirements for resource consents required for building in a heritage precinct. The changes are also based on new draft heritage guidelines developed for Council by heritage expert Dr Glen Hazelton following an extensive review of the history and character of each of the five precincts, including Clyde. PC20 has been promulgated alongside PC19 to acknowledge that PC19 includes the introduction of a new MRZ applying to the Clyde Heritage Precinct, which would allow for development at a higher density than is currently experienced within the district.
128. Given the input from heritage and urban design experts, as well as the retention of controls within the precinct applying through Section 11 of the District Plan, I do not consider the

²⁸ #106 - R and R Madden, #107 - A & R Cowie, #109 - L Joyce, #110 - M McLennan

²⁹ *Central Otago District Council Medium Density Residential Design Guide*, pages 27-28.

application of MRZ will compromise the heritage values of the Township. In particular I note that new buildings within the precinct require resource consent under Rule 11.4.1(b).

129. With respect to effects on the current character, I accept that the character of this area is likely to change over time. However, this change was considered through the Spatial Plan process and is part of a comprehensive approach to accommodating anticipated growth. Removing all MRZ from Clyde would therefore risk the provision of adequate housing supply to meet demand.

Recommendation

130. I recommend that the proposed MRZ zoning within Clyde is retained as notified.

Earnsclough Road

Submissions

131. Phil Murray and Lynne Stewart (#44) seek that the land currently zoned Rural Residential on Earnsclough Road is zoned LLRZ (the general area is shown below). The submitters consider that LLRZ would be a more efficient use of land, given its location within walking proximity to the Clyde commercial centre, and that the current zoning provides for houses on large sections



which are too small for productive use. They consider that the sites in this area can be serviced by onsite septic tanks and the current community water scheme.

Analysis

132. The NPS-HPL does not apply to the land in question, because it is not currently zoned the equivalent of general rural or rural production (rural residential being more akin to a rural lifestyle zone under the NP Standards).
133. Ms Muir notes that this area could be serviced with water but would require reticulation from the Clyde township to be installed across the Clyde Bridge. She notes that it could be serviced for wastewater from Clyde in the future after the wastewater treatment upgrades are completed, but that the costs for providing reticulated wastewater will be significant as this is likely to need to be pumped. This may mean reticulation is not feasible. Reliance instead on further on-site disposal systems could have potential cumulative effects on water quality, given the proximity of this area to the river.
134. From an urban form perspective, while close to the town centre as the crow flies, the Township is currently contained on one side of the Clyde River, and rezoning of this area would result in the Township extending to the other side of the river. From a yield perspective, there is sufficient capacity provided to meet anticipated growth through PC19, without the need for further land to be zoned. This area is also outside the areas identified for 'upzoning' within the Vincent Spatial Plan, which instead seeks to allow for infill development of current rural-residential land between Alexandra and Clyde, where reticulated water supply is anticipated to be provided over time, and where growth is only provided for on the east bank of the Clutha River.³⁰ Given additional infill is not required in Clyde to meet anticipated demand, and given the rezoning would result in urban development in an area that is inconsistent with the general direction of the Spatial Plan, I do not consider the zoning to be appropriate.

Recommendation

135. I recommend that the current Rural Residential zoning on Earnsclough Road is retained.

³⁰ Vincent Spatial Plan, 4 April 2022, page 24

East Side of Waipuna Road

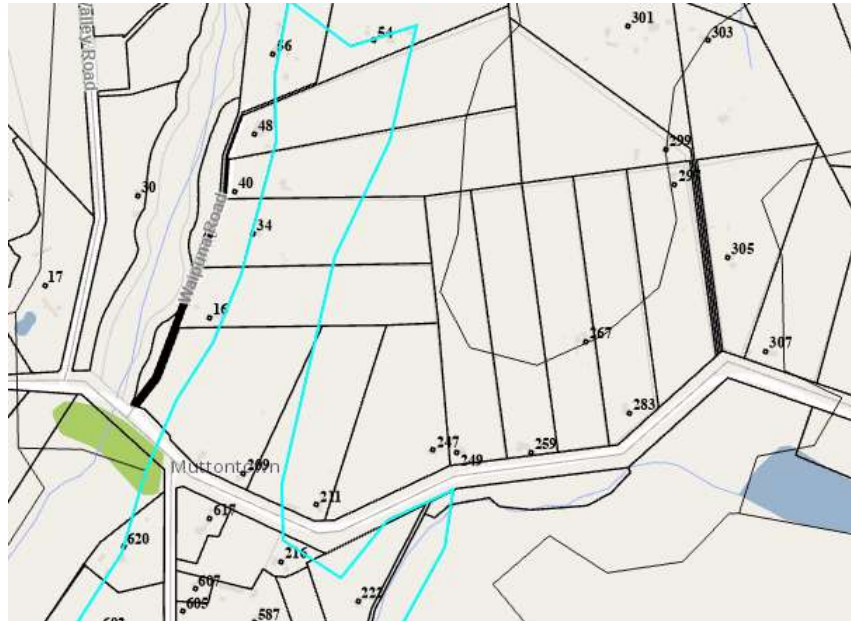
Submissions

136. Carey Weaver (#168) seeks that six properties located to the east side of Waipuna Road and fronting Springvale Road, should be included in PC19, as these properties are generally small self-contained lifestyle blocks rather than rural blocks. The general location is shown below, although it is not clear from the submission exactly which 6 properties are referred to. As PC19 does not include Rural Lifestyle zoning, it is also assumed that the zoning sought is LLRZ.



Analysis

137. The current zoning of the sites in this area is Rural Resource Area. As such, the NPS-HPL is relevant, and I note that part of this area (within the blue lines below) contains LUC 3 soils, making them highly productive land. As noted earlier, Clause 3.6(4) sets out specific circumstances where the Council may allow urban rezoning of highly productive land, the first being that the rezoning is required to provide sufficient development capacity to meet expected demand for housing or business land in the district. As there is already sufficient capacity provided through PC19 to meet anticipated growth, the rezoning of any of these sites which contain Class 3 soils would be contrary to the NPS-HPL.



138. I also note that these sites are located outside the servicing area looked at as part of PC19, and Ms Muir notes that they are not able to be serviced for wastewater.
139. From an urban form perspective, the rezoning of these sites would result in the urban boundary extending beyond that anticipated through the Vincent Spatial Plan, and I note that it would not be contiguous with any other urban zoned land, as it would be surrounded on 3 sides by rural land, and on the fourth by rural residential (which is considered under the NP Standards to be a rural zone) and would therefore result in a less consolidated urban form. While I consider that the rezoning of some sites is precluded by the NPS-HPL in any case, I consider that the rezoning is not appropriate, as it is not necessary to meet demand, there are wastewater servicing constraints, and it would result in urban development in an area that is inconsistent with the general direction of the Spatial Plan.

Recommendation

140. I recommend that the current Rural zoning on the eastern side of Waipuna Road and fronting Springvale Road is retained.

Addition to FGO Area

Submissions

141. John Sutton (#76) seeks that two properties at 475 Clyde to Alexandra Road (shown below) are included in the Low Density Future Growth Overlay. The submitter states that the useable irrigated flat area of these sites is small, and not viable for any commercial rural enterprise, and notes that current irrigation is expected to be unable to be continued in future.



Analysis

142. These sites do not contain any highly productive land and therefore the NPS-HPL provisions do not apply to it. As such, this matter does not preclude rezoning of the site. From a servicing perspective, Ms Muir states that this area could be serviced for water but cannot be serviced for wastewater, and notes that there is no plan for reticulation of this area in the future. Further, even if reticulation is to be provided by the developer, then this could not proceed until wastewater treatment upgrades are completed. I consider the current servicing constraints would not preclude the inclusion of the site within the FGO, given this overlay applies to areas where there are currently servicing constraints. However, from a yield perspective, there is sufficient capacity provided to meet anticipated growth through PC19, without the need for further land to be zoned in this area. Within the Vincent Spatial Plan, the land is identified instead for Rural Residential Development, consistent with the land to the east and south. I also note that the topography of these sites (including a gully) is quite distinct from the adjoining land which is included in the FGO. I consider the gully provides a clear and appropriate break between the FGO and the remaining rural area.

143. Overall, given this site is more congruent with the land to the east and south, and the lack of additional land being required to meet anticipated demand, I do not consider the rezoning to be appropriate.

Recommendation

144. I recommend that the current Rural zoning of 475 Clyde to Alexandra Road is retained.

14. Cromwell

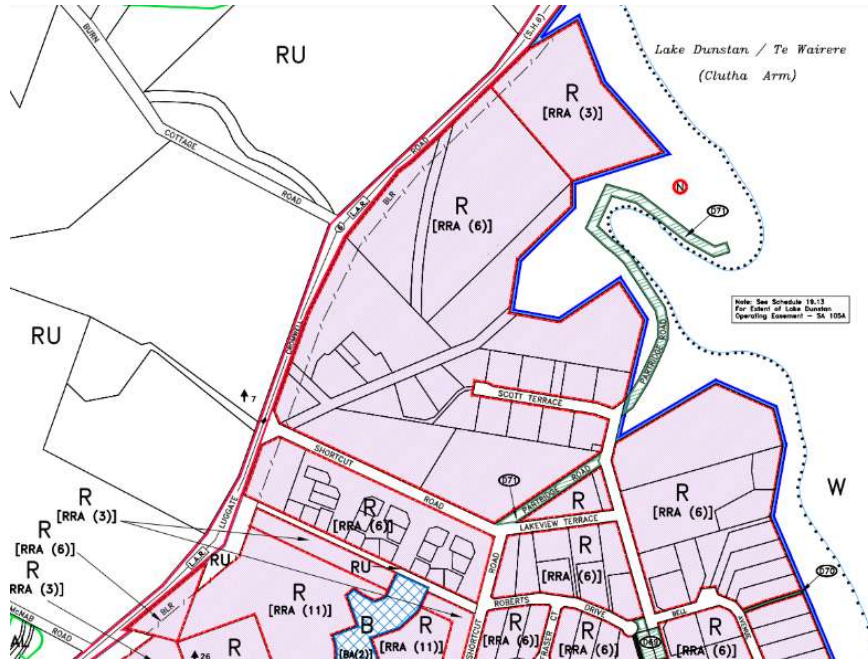
North Cromwell

Submissions

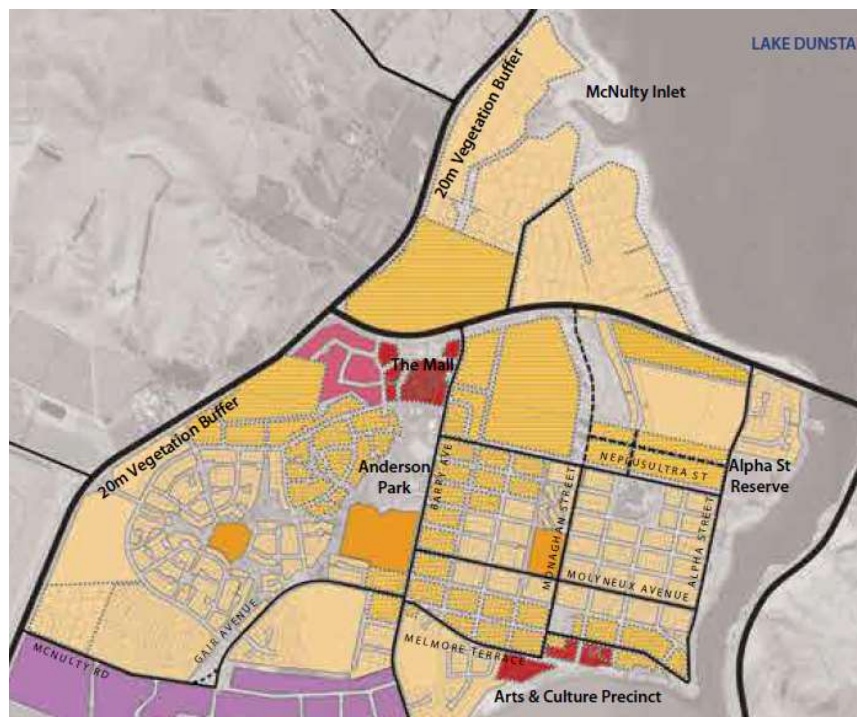
145. A large number of submissions were received in relation to the proposed LRZ and LLRZ zoning to the north of State Highway 8B. Because of the volume of submissions, these are discussed at a broad level, rather than individually. This section of the report also does not address the zoning of the area referred to as Wooing Tree (adjoining this area and proposed to be zoned MRZ), which is discussed in a separate section.



146. For context, the current zoning of this area, taken from the current planning map is shown below. This shows that the majority of the area is zoned Residential Resource Area 6 (RRA(6)), except for a small portion at the northern end which is zoned Residential Resource Area 3 (RRA(3)). The minimum allotment size in RRA(6) is 4000m², and in RRA(3) is 1000m², but is subject to compliance with a concept plan (in Schedule 19.19) and limited to 21 allotments.



The Cromwell Spatial Plan (shown below) proposes that this area is ‘upzoned’ to provide for standard suburban residential development, reflecting that the intent of the Spatial Plan is to focus growth within the existing urban area of Cromwell.³¹ This is applied through PC19 as the Low Density Residential Zone (LRZ).



147. The s32 report notes that the zoning proposed in PC19 differs from that of the Spatial Plan in this area, by proposing that properties fronting Lake Dunstan on Bell Avenue, Lake View Terrace,

³¹ Cromwell ‘Eye to the Future’ Masterplan, Spatial Framework, Stage 1: Spatial Plan, 5 June 2019, page 41.

Stout Terrace, Thelma Place, the McNulty Inlet recreational area/lakefront, and the nohoanga site, are zoned LLRZ. The report states that LRZ density *“is considered inappropriate due the proximity of the nohoanga site and recreational use of the lake front and Large Lot Residential zoning is proposed.”*³²

148. There are a range of requests in relation to the zoning of this area.
149. Firstly, some submitters seek retention of current 4000m² allotment size across whole of current area zoned RRA(6),³³ or in particular areas.³⁴ The reasons for this (in brief) are:
- a. a desire to retain the current amenity values and character of the area;
 - b. concern that it loses the transition between urban and rural areas, making it too urbanised;
 - c. interruption of views, reduction of open space and removal of trees and birdlife;
 - d. increased noise, increased traffic and additional pressure on services;
 - e. that the area is flood prone;
 - f. that there are sufficient other areas to accommodate growth, or the growth projections are out of date and may result in oversupply;
 - g. that this is not the right area to accommodate growth, including that it is too far from town centre; and
 - h. that the current density allows for higher end homes that if not provided for will go to Wanaka or Queenstown.
150. Mike & Keren Wright (#87) oppose the application of any LRZ in this area,³⁵ seeing the application of 2000m² (through LLRZ) as a compromise. Fraser James Sinclair & Kelly Michelle Checketts (#153) seek that all properties in Scott Terrace are zoned LLRZ instead of LRZ. Mark Mitchell (#113) seeks that the area zoned LLRZ is increased to include Bell Ave and Scott Terrace, but with a lower minimum of 1000m² applying in this area. This submitter considers that additional development on the lakefront would not be obvious, as most sites contain development close to the 15m setback already, and considers the alternate density would

³² Central Otago District Plan, Plan Change 19 – Residential Chapter Provisions, Section 32 Evaluation Report, at paragraph 6.

³³ For example #20 - Stephen & Lorene Smith, #23 - Andrew James Wilkinson, #25 - Jan Hopcroft, #38 - Lyall Hopcroft, #39 - Yvonne Maxwell, #40 - Roddy Maxwell, #50 - John Walker, #55 - Robert David Scott, #57 - Barbara Walker, #63 - Julene Anderson, #65 - Ian Anderson, #118 - Lakefield Estate Unincorporated Residents Group, #131 - Lois D Gill, #171 – Fin White

³⁴ For example, in and around Thelma Place (#13 - Peter & Leanne Robinson and #54 - North Cromwell Society Incorporated), the proposed LLRZ areas (#35 - Bernard and Clare Lynch), the area to the north of Scott Terrace, east of SH6 and southwest of Lake Dunstan/McNulty Inlet (#66 - Trevor Deaker & Mark Borrie)

³⁵ Note - it is assumed that the submitter is referring to the LRZ proposed in this area only, and is seeking application of LLRZ to it instead of LRZ.

provide a better transition between the LLRZ and LRZ areas and better address potential traffic effects from infill on the State Highway/Bells Avenue intersection.

151. Two submitters seek application of lower densities such as 1000m² or 1500m² to some or all of the proposed LRZ areas.³⁶ Reasons for this include that this will better reflect the transitional character of area while still allowing for some infill; and better addresses potential traffic increases. Richard & Wendy Byrne (#8) seek that sections on the lakefront “in their area” be no less than 1000m². However I note that that the proposed LLRZ already achieves this as the minimum allotment size under the zoning is 2000m². Two submitters³⁷ seek that LRZ is extended to include all of Lakeview Terrace, excluding properties with lake frontage or access to the cycle trail.
152. Colin James Reece (#5) seeks that the full area be zoned LRZ, considering 4000m² to be “*a thing of the past*” and 2000m² sections to be of little use. However, he also seeks that height restrictions are included in this area to stop 2 storey development blocking views. Similarly, Anthony Lawrence (#37) seeks that LRZ is applied to this area, as in his view, the area has lost “aesthetic value” of just large lots, due to higher density development in parts of this area, and in Wooing Tree. He also considers that the area is in close walking distance to town centre (including the planned underpass), within the current urban boundary, and LRZ is what Spatial Plan envisaged. He is also concerned that the growth projections on which the Spatial Plan is based may be too conservative, meaning greater supply is required. With respect to the reasons given for the application of LLRZ to some of this area, the submitter considers that the concerns about the potential impacts on the nohoanga site are unknown and expresses the view that restricting the density may not be the right mechanism to address any concern. With respect to recreational usage of the lake frontage, he considers that application of LRZ would not markedly increase lots that could be seen from lakeside reserve and considers that riparian usage in this area is no different to that in other parts of Cromwell adjoining Lake. He considers that managing lake border could be done by minimum frontage rather than use of LLRZ.
153. Related to the above point, Julene Anderson (#63)³⁸ also notes that the Spatial Plan did not propose dividing this area into two different zones and that in terms of the nohoanga, this was considered in a previous 32-lot subdivision application where Kā Rūnaka raised concerns about the adverse effects that subdivision and development might have on sites of cultural significance to Kāi Tahu. The submitter considers that the same concerns will apply to all of the current RRA(6) area; not just the sites proposed under PC19 to be LLRZ, as there are some LRZ sections which are closer to the nohoanga than those proposed to be LLRZ. The submitter also expresses concerns with “*recreational use of the lake front*” being a reason for apply two different zones in this area, as they consider visibility of housing does not affect access to the lake front area.

³⁶ For example #121 - Gary Anderson, #153 - Fraser James Sinclair & Kelly Michelle Checketts

³⁷ #4 - Deborah Glenis Reece, #6 - Deborah & Colin Reece

³⁸ I note this submitter is one of the parties seeking retention of the current density across this area, but is mentioned here because of the specific comments regarding the rationale in the s32 report for the application of the LLRZ.

154. D & J Sew Hoy, Heritage Properties Ltd (#51) seek that the two properties (shown below) and located on the western side of this area, are zoned MRZ. They consider that the proposed zoning significantly limits the development potential of this site, noting it is a vacant site and therefore provides an opportunity for higher density development to meet increasing demand. As an alternate, they seek the western site is at least zoned LRZ.



155. With respect to the area zoned RRA(3) currently (refer below), Paul Robertson (#59) opposes allowing section sizes of lower than 4000m² in the area northwest of Rotary Glen, McNulty Inlet to State Highway 6, stating that this area is classed as rural, infrastructure does not support a higher density, lower density development should be at the outer edges of the Township and that the area is flood prone. As noted above, the majority of this area that I understand the submitter is referring to is zoned RRA(3) currently and provides for 21 sections in total, with a minimum lot size of 1000m². Brian De Geest (#21) opposes the rezoning of RRA(3) to LLRZ, seeking that it is zoned MRZ, as, in combination with 15m lake setback and 30m State Highway setback, he considers that there are very little development opportunities for site. He notes that MRZ has been applied away from the town centre in other areas.



Analysis

156. As can be seen from the above summary, the zoning of this area has attracted a number of submissions, with a wide variation in views. This indicates that there is not an easy solution to the zoning in this area, nor a strong consensus view. From a contextual point of view:
- a. The current zoning of the majority of this area is RRA(6), which provides for a density of 4000m².
 - b. The Spatial Plan identified a shift in the density of this area, from the current lower density (applied in PC19 as LLRZ) to a general residential density consistent with the township's existing residential areas (applied in PC19 as LRZ).
 - c. PC19 proposed some that the northern and eastern areas be zoned LLRZ, with the remainder of the area zoned LRZ, on the basis that the LRZ density was considered inappropriate given the proximity of the nohoanga site and recreational use of the lake front.
157. The Spatial Plan seeks to provide a clear framework for how anticipated growth in Cromwell is to be provided for in a sustainable way, while retaining aspects of Cromwell's 'country town' character and its 'World of Difference' values.³⁹ The direction of the Spatial Plan is to consolidate urban development, with future growth predominantly accommodated within the existing urban area, at a higher density of development than is currently occurring,⁴⁰ reflecting

³⁹ Cromwell 'Eye to the Future' Masterplan, Spatial Framework, Stage 1: Spatial Plan, 5 June 2019, page 9.

⁴⁰ Ibid, page 22, under Objective 1

the community's preference for focussing growth in this area.⁴¹ Infill opportunities are sought to be enabled where consistent with a consolidated urban form and higher density objectives, in locations contiguous with existing subdivision and development and existing infrastructure.⁴² Specifically, development, including infill and redevelopment is anticipated in areas that are substantially within or nearby an 800m radius from the town centre.⁴³ Another key aspect of the Spatial Plan is to provide sufficient residential capacity to meet demand, as well as providing housing choice.⁴⁴ I consider that the 'upzoning' of this area, to allow for infill development is consistent with this direction. Conversely, I consider that should the status quo be retained, limited opportunities for infill development would be provided, and this could compromise the provision of supply. I do however note that the Council's most recent yield projections (refer **Appendix 2**) do identify an overall surplus of supply within Cromwell Township – therefore the impact of reduced supply, would likely be a medium or longer term issue. I also note that the provision of supply in the Cornwell Township is also interrelated with provision of supply in Pisa Moorings and Bannockburn, which is discussed elsewhere in this report.

158. With respect to the concerns of submitters seeking that that status quo is maintained, I accept that any change from the status quo will have an affect on amenity values and character of the area, including increased traffic, noise, interruption of views and general reduction in the open space to built form ratio in the area. As set out earlier, I consider that it is reasonable to expect that amenity values and character of areas will change over time, and I do not consider that the RMA, or the District Plan requires protection of the amenity and character derived from the current status quo. Rather, the impact of the changes on amenity and character need to be weighed up against matters, including the need to provide sufficient supply to meet demand, and the consequences of providing for this in alternate areas. Similarly, there is no requirement to maintain a transition between urban and rural areas, and I note that there are other areas where LRZ or higher density LLRZ abut the rural zone, so I do not consider it necessary to maintain the current density for this reason. As noted above, intensification of this area is required as part of the overall response to accommodate anticipated growth over the longer term, and more recent yield assessments have demonstrated that growth is occurring faster than previously predicted. Therefore I do not consider that any zoning of this area at a higher density than the status quo will result in oversupply. With respect to whether this is the right area to accommodate growth, including its proximity to the town centre, I consider that this was a matter considered and determined through the Spatial Plan process. I do, however, accept that altering the status quo will reduce the supply within the urban boundary of sections of this particular size.
159. Apart from the status quo, alternates sought by submitters include retaining the distinction between the LLRZ and LRZ areas, but altering the boundary of these areas; or applying either LLRZ or LRZ to the full area. With respect to the split zoning, I note that the Spatial Plan did not distinguish between these areas. Having considered the reasoning given for this in the s32

⁴¹ Ibid, page 23, under Objective 2

⁴² Ibid, page 23, under Objective 2

⁴³ Ibid, page 43.

⁴⁴ Ibid, page 24, under Objective 5.

report, and the comments made by submitters on this, I tend to agree that it is not sufficient to justify the split in zoning. More specifically, I agree that while development may have impacts on the nohoanga site, applying a lower density in proximity to this may not be the most appropriate mechanism to manage this. Of note, the Spatial Plan acknowledges that the nohoanga site is within the “Area of Focus/Area of Study” of the Spatial Plan, but does not identify a need to manage density in proximity to it, nor any other particular controls/limitations this may have on development. I also do not consider that density is likely to have an impact on the recreational usage of the lake frontage, nor is this applied in other parts of Cromwell adjoining the lake. I therefore tend to consider that it is more appropriate to apply a single zone in this area, regardless of the specific density; or at least that if more than one zone is applied, it should not be for these reasons.

160. As this area was identified within the Spatial Plan for infill development, it is part of the planning outlined by Ms Muir that is being undertaken in relation to water and wastewater services to meet anticipated growth.
161. With respect to the MRZ sought by D & J Sew Hoy, Heritage Properties Ltd, I do not consider this to be appropriate, given that this would leave a strip of lower density development between two areas of MRZ. Should the distinction between the LRZ and LLRZ be retained, I do however agree with rezoning the western position of their site LRZ.
162. With respect to the area currently zoned RRA(3), I note that the land has not been identified in the planning maps as being flood prone. Development down to 1000m² is also anticipated under the site’s current zoning. I consider it is more appropriate however to rationalise the zoning of this site and align it with that of the rest of this area. I do not agree that it is appropriate to zone this area MRZ, as it would result in a disparate area of MRZ separated from any other areas, and at the edge of the township. I note that in other areas where MRZ is proposed on greenfield sites further from the town centre, it applies to larger sites where a more comprehensive development can be undertaken, rather than in a smaller, more isolated pocket as this site would be.

Recommendation

163. I recommend that the zoning of the area to the north of State Highway 8B and to the west of Luggate-Crowell Road (but excluding the Wooing Tree site) is rationalised and a single zoning applied to this area. I do not recommend that any of this area is zoned MRZ.
164. In terms of the specific density, I do not make a specific recommendation in relation to this, given the volume and disparity of submissions. However, I consider that the key matters to be considered by the Hearing Panel in deciding on the zoning in this area are:
 - a. Continuation of the status quo (4000m² density) would not be consistent with the direction in the Spatial Plan and therefore in my view, could risk undermining its intent with respect to focussing growth within the existing urban area. However this needs

to be weighed up with the retention of the of the values held for this area in its current form.

- b. Application of LLRZ across this area would provide for less development opportunities than LRZ (and therefore reduce supply, but not as much as application of the status quo), but would provide for a more subtle change in the character. It would also provide greater opportunity for lower density forms of development within the township.
- c. Application of LRZ would be consistent with the Spatial Plan and therefore assist in providing the necessary supply to meet demand, in a consolidated manner. Consequentially, it would assist in avoiding pressure for development in less suitable areas, e.g. those which would not align with the Spatial Plan aims around consolidation. However, it would have a greater impact on the character of this area, and reduce the options for lower density forms of development within the township.
- d. There is scope within the submissions for application of an alternate density (e.g. somewhere between LRZ and LLRZ) to some or all of this area. The pros and cons would be somewhere inbetween/relative to those identified above.

Waenga Drive MRZ

Submissions

165. Rosemarie Carroll (#43) opposes the proposed MRZ between Waenga Drive and Kawarau Gorge Road (SH6) (refer below for general location). The submitter considers that the current zoning provides a reasonable level of amenity to properties in this location and considers that MRZ will have significant impact on amenity of the adjoining residential area, including current enjoyment of their property. While seeking that MRZ is not applied to this area at all, as an alternate the submitter seeks that the existing houses along the north side of Waenga Road are zoned LRZ.

166. Goldfields Partnership (#31) request that the MRZ between Waenga Drive and Kawareau Gorge Road (SH6) be expanded to extend further south, as shown below. They consider that the proposed LRZ density in conjunction with the required 30m setback from SH6 will result *“in very little area for any actual development on the site”*. They also consider that it will limit the potential for comprehensive residential development to be undertaken on *“one of the last vacant sites large enough in Cromwell to achieve such a development”*. They also consider the curved boundary to be illogical.



Analysis

167. I accept that development under the MRZ framework will have an impact on the residents within and adjoining these areas, and over time change their character. However I consider that it is reasonable to expect that amenity values and character will change over time, and I do not consider that the RMA, or the District Plan requires that there is ‘no change’ in existing residential areas. The application of MRZ in this area is part of the Council’s response to providing sufficient supply to meet anticipated demand. It is also generally consistent with the direction taken in the Spatial Plan to enable consolidated urban development within the existing urban area, at a higher density of development than is currently occurring.⁴⁵ While the proposed MRZ extends further south than signalled in the Spatial Plan, the majority of the additional area is a greenfield site, which allows for comprehensive and integrated development to occur which

⁴⁵ Cromwell ‘Eye to the Future’ Masterplan, Spatial Framework, Stage 1: Spatial Plan, 5 June 2019, Page 22.

will further assist in providing an appropriate supply of land. If these areas are not rezoned to allow for further development, then demand would have to be met elsewhere, either through other areas being zoned MRZ, or by expansions outside the current urban boundary. Given the Spatial Plan considered other options, I consider that the areas identified for MRZ are the most appropriate.

168. I agree with Goldfields Partnership that the curved boundary currently proposed between the MRZ and LRZ in this area is not appropriate. I consider that the boundary between these zones should therefore be straightened. If the current split between the zones is generally retained, this could be achieved by having the boundary run parallel from where it currently adjoins Waenga Drive, out towards Ripponvale Road. With respect to rezoning the full site to MRZ, I note that this will expand the MRZ further away from the commercial area, and note that PC19 already proposes an additional area of MRZ (immediately to the north of these sites, as discussed above) than what was identified in the Spatial Plan. I do not agree that the 30m setback and LRZ provisions results in very little area for development, given the property is some 14ha in size. Balanced against this is the submitters comments that such a greenfield site provides better opportunities for comprehensive development than infill of existing areas. However, given that additional supply is not required to meet the anticipated demand in Cromwell I do not consider it necessary to rezone this additional area MRZ. If, as a consequence of decisions on other submissions, the Hearings Panel reduces capacity elsewhere in Cromwell, then I consider that this should be revisited, as zoning this site MRZ could offset a reduction elsewhere.

Recommendation

169. I recommend that the LRZ between Waenga Drive and Kawarau Gorge is generally retained as notified, subject to:
- a. The boundary between the LRZ and MRZ being adjusted so that it runs parallel from where it currently adjoins Waenga Drive, out towards Ripponvale Road; and
 - b. Consideration of other decisions on zoning in Cromwell and whether the any reduction in yield in other areas should be off-set by some or all of this area being zoned MRZ.
170. In terms of s32AA of the RMA, I consider that the boundary adjustment is a minor change that would not have a noticeable impact on the surrounding area, but is more efficient in terms of future development if the site.

Freeview Orchard

Submissions

171. Freeway Orchards (#30) and CHP Developments Limited (#148) support the rezoning of this site to MRZ. Three submitters⁴⁶ oppose the proposed MRZ for the Freeway Orchard site (see figure below). Reasons include that:
- a. the rezoning does not protect the productive soils of this area and if rezoned, it should be offset with a restriction on the conversion of other rural designation land.
 - b. The proximity to State Highway and lack of suitable walking and cycling facilities make the site unsuitable for medium density development.
 - c. LRZ would be consistent with Prospectors Park.
 - d. MRZ will impact existing properties adjacent to the zone due to density, height, traffic and noise.



Analysis

172. As the site was included in both the Spatial Plan and PC19, the NPS-HPL does not apply to it. I therefore consider the impact on productive soils to be of limited relevance. While I accept that the surrounding area is zoned LRZ, in my view, this does not mean that MRZ is not appropriate, and I note that there are controls in PC19 to mitigate the effects at the boundary of MRZ and LRZ areas, particularly in terms of recession plane controls. As a larger site, MRZ also provides for a comprehensive and integrated development, and is consistent with the direction taken in

⁴⁶ #36 – NR Murray, #55 – Robert David Scott, #122 - Aimee Cornforth

the Spatial Plan to enable consolidated urban development within the existing urban area, at a higher density of development than is currently occurring.⁴⁷ Changing this site to LRZ would therefore reduce the yield anticipated from the development of this site, and demand would need to be met elsewhere, either through MRZ in locations further away from the town centre, or expansions outside the current urban boundary. As this would be inconsistent with the intent of the Spatial Plan, I do not consider this to be appropriate. I also note that future development of this site will include consideration of walking and cycling connections, in accordance with the provisions of PC19 and as set out in the Medium Density Residential Design Guide.

173. With respect to imposing restrictions on the conversion of other rural designation land, I note that PC19 does not include any changes to the Rural Resource Area provisions, which control the level of development of properties zoned as such. Should a zone change be proposed in future, this would need to be considered on its merits through a plan change process, as provided for under the RMA.

Recommendation

174. I recommend that the MRZ zoning of the Freeway Orchard site is retained as notified.

182 Waenga Drive

Submissions

175. Foodstuffs (South Island) Properties Ltd (#62) seek that a portion of the site at 182 Waenga Drive, as shown below within the red outline, is zoned Business Resource Area. As part of a resource consent to expand the supermarket, resource consent was granted for car parking and access to be extended in this area, along with an associated reserve revocation process to allow this. The change in zoning is sought to reflect the intended and consented use and noting the recent expansion sits within a wider commercial area.



⁴⁷ Cromwell 'Eye to the Future' Masterplan, Spatial Framework, Stage 1: Spatial Plan, 5 June 2019, Page 22.

Analysis

176. I consider the extension of the BRA to this part of 182 Waenga Drive to be appropriate. The proposed area to be rezoned is a discrete area and located adjacent to a designated reserve area. Because of these factors, I consider that the shift in the current boundary will have a limited impact and has essentially been considered through the resource consent and reserve revocation process. I therefore do not consider that the concerns relating to the New World Alexandra site arise in this instance.

Recommendation

177. I recommend that the portion of the site at 182 Waenga Drive, shown above within the red outline, is zoned Business Resource Area.

178. In terms of s32AA of the RMA, I consider that the change is a relatively minor boundary adjustment, and that development of the site in line with the consent better aligns with the objectives sought under the Business Resource Area framework than that of the MRZ. I consider the loss of potential MRZ is negligible, given the small size of this area, and given that residential development is not anticipated under the current consent.

Wooing Tree

Submissions

179. Wooing Tree Development Partnerships Limited (#79) note that their approved resource consents broadly reflect the zoning proposed for their site in PC19. While they generally support the application of MRZ to their site, they are concerned that the area currently zoned BRA has been rezoned MRZ. While they consider that the current location of this zone is “*not the most appropriate location within Wooing Tree Estate*”, they seek that alternate land is zoned BRA, which aligns with locations identified in the Fast-Track consent (shown in red in the plan below). They state that current BRA(2) provides for 4,000m² of retail within Wooing Estate, within which there can be 5 tenancies of 200m². They note that the proposed MRZ provisions only provides for convenience retail activities which do not exceed 150m² gross floor area. The submitter states that to further align with the Fast-Track consent, the rules applying in BRA(2) could be amended to “*reduce the total area of commercial / retail activity across Wooing Tree Estate to 1,000m² and the maximum tenancy size to 350m²*”. As an alternate to this, they seek that the definition of convenience retail activities be increased to align with the 350m²/1000m² limits referred to above.



Analysis

180. The alternate relief sought has been addressed in Part 1 of the s42A report, and is mentioned here only for completeness. As noted in that report, the changes sought to Standard 8.3.6(i)(b)(ii) are also considered to be outside the scope of PC19. Given the consented development within this site, I consider the removal of the current BRA zoning (from its current location) to be appropriate, as MRZ better reflects the consented development.
181. In terms of applying BRA(2) zoning to those areas where some commercial development has been considered and consented through the Fast-Track process, I am conscious that while the zoning may, on the face of it, better align with what is anticipated through the resource consent, application of the zoning provides for a broader range of development than what the consent is limited to. In this regard, I note the concerns expressed in the further submission of Waka Kotahi, that the consent specifically restricted the scope of commercial activities and includes consent conditions to avoid driver distraction. I agree with their comment that rezoning these sites BRA could result in more permissive standards than those applied through the consent process and I therefore do not consider that the applying the BRA(2) zoning to this area is appropriate at this time. However, when the provisions in the Business Resource Area chapter are reviewed, it may be appropriate to reconsider zoning of this area, given the provisions will also be subject to amendment, and the relevant consent conditions could be applied instead through the rule framework.

Recommendation

182. I recommend that the MRZ zoning applying to 64 Shortcut Road is retained as notified.

East of Town Centre

Submissions

183. Keyrouz Holdings Limited (#125) seek a change to the zoning of the area located on the south-eastern corner of Barry Avenue and State Highway 8, from MRZ and LRZ, to Business Resource Area. The zoning proposed under PC19 is shown below.



184. With respect to the parcel fronting the State Highway, the submitter notes that this is currently zoned BRA(1), but is subject to a designation for amenity planting and in the Spatial Plan is not identified for residential development. The submitter further notes that a Building Line Restriction of 30m applies on the northern side of SH8B and notes the same could be applied to this parcel.
185. Of the other areas, the submitter notes that while currently zoned RRA, they contain a bar and restaurant, a hotel, a liquor store, and associated areas of car parking, along with a residential dwelling. They consider that the proximity of these sites to the current BRA and SH8 has driven their use for commercial purposes and that the location of the site makes it suitable for further commercial development. They also state that the current investment in the existing buildings mean it is unrealistic that they would be removed to allow for residential development.
186. The submitter considers that applying residential zoning to these sites *“will apply an inappropriate objective, policy and rule framework to future activities associated with the maintenance and development of existing assets”* and make any further commercial development difficult. While noting the eastern parcel is identified in the Spatial Plan as a ‘green link’ they note that the parcel is in private ownership.

Analysis

187. While the parcel fronting the State Highway is currently zoned BRA(1), as noted by the submitter it is designated for amenity planting purposes and therefore the underlying zoning, whether it be BRA(1) or MRZ is, in my view, not particularly relevant. I tend to think that the underlying zoning should however be aligned with the parcel to the south, for consistency.
188. In considering the zoning of the main portion of the site, I note that while the overall 'Future Land Use' plan contained Spatial Plan does not identify this site for commercial uses, as noted by the submitter, a more detailed plan of the town centre does identify the southern portion of the site for 'potential future mixed use buildings'.⁴⁸ I also note that the site is currently identified as a Scheduled Activity (SA100) for travellers accommodation (the "Golden Gate Lodge"). I consider that the rezoning of this site to BRA is appropriate because:
- a. development, including further development of the northern portion would be consistent with the current amenity and character derived from the existing uses in this area;
 - b. given the proximity of site to the town centre, and the existing land uses, I consider the rezoning would consolidate the commercial centre, rather than detracting from it;
 - c. the effects of any development are consistent with the surrounding business area, or there are sufficient buffers between the site and residential land uses;
 - d. I agree with the submitter that residential development of the northern portion of the site is unlikely give the existing investment; and
 - e. I have also considered whether the southern (vacant) portion of the site could be retained as MRZ, with the northern portion zoned BRA, as while the submitter notes that the land would need to be subdivided to enable this, I do not agree that the zone boundary must necessarily follow the current parcel boundary, and do not consider that the need to subdivide the site first is a sufficient impediment to residential development. However, I consider the reserve strip to the south would provide an appropriate boundary between the Business and residential zoning, and further development of the southern portion for mixed uses is contemplated in the Spatial Plan, which is more consistent with a BRA than an MRZ zoning.
189. Finally, with respect to the LRZ of the eastern portion of this area, I note that this is anticipated to be a green link in the Spatial Plan. Regardless of its current ownership, I consider that zoning is not usually used as the mechanism for implementing such a link; more usually this is pursued through acquisition of the land by the Council, vesting as a reserve through subdivision, or by way of designation or so on. If this does occur, and in future such areas are zoned open space, the zoning of this strip can be reconsidered. However at this point I consider this area should

⁴⁸ Cromwell 'Eye to the Future' Masterplan, Spatial Framework, Stage 1: Spatial Plan, 5 June 2019, page 45.

also be zoned BRA for consistency, noting that I do not consider the zoning of either BRA or LRZ ultimately affects whether it is acquired as a green link.

Recommendation

190. I recommend that the land on the south-eastern corner of Barry Avenue and State Highway 8 is zoned Business Resource Area.
191. In terms of s32AA, I consider that it is more efficient to apply the Business zoning to that part of the site which has established commercial uses. I also consider that the current use of the site aligns better with the outcomes sought for the BRA than with those of the MRZ and therefore applying the BRA to this area better assists in achieving the outcomes sought by the Plan. I consider that applying Business zoning to the wider site, while reducing the potential for some additional residential development, is more appropriate as it provides for a more consolidated business area and is consistent with the current use, character and amenity of the surrounding area. I also consider the loss of potential development is not of such a scale that it would undermine provision of sufficient supply. I consider that the adverse effects arising from potential future development of this area under the BRA framework are adequately managed through the BRA framework and through the buffer that exists between these sites and surrounding residential areas.

Extent of MRZ in Cromwell

Submissions

192. Johnathan Brass (#132) opposes the application of MRZ proposed in Cromwell south of Waenga Drive and Neplusultra Street, and considers that the amount of rezoning proposed is not needed, and has concerns about the impacts of MRZ, including parking, shading and privacy effects, on existing communities. The submitter seeks that MRZ is only applied close to retail and commercial areas.
193. Wally Sanford (#144) considers that MRZ in Old Cromwell Town should be amended to a radius approach rather than a strip approach, particularly when considering the existing pattern of density in the area and the “hub” that the higher density surrounds.
194. Susan Woodard and David Barkman (#157) oppose the application of MRZ to “Old Cromwell Town” (within Monaghan Street, Inniscort Street, Melmore Terrace, Neplusultra Street). They consider that the aesthetic of the area, the views from the Dunstan cycle trail and quiet enjoyment of the area would be impacted and consider that other areas are more suited to higher density development.
195. Deborah & Neville Kershaw; Howard Anderson; Colleen & Russell Parker; and Chris Pickard (#15) also oppose the proposed MRZ applying to parts of Old Cromwell, specifically Inniscourt and Donegal Streets. They consider that these should be excluded from Plan Change 19 because of their special character and lack of suitable sites for development. They consider the medium density development will affect the existing character and amenity of owners who desire to

retain larger open space and privacy and consider that such development is better located in new housing areas rather than existing areas.

196. The map below shows the proposed MRZ zoning within the area referred to by these submitters.



Analysis

197. I accept that development under the MRZ framework will have an impact on the residents of these areas, and over time change their character. However I consider that it is reasonable to expect that amenity values and character will change over time, and I do not consider that the RMA, or the District Plan requires that there is 'no change' in existing residential areas. The application of MRZ to these areas is part of the Council's response to providing sufficient supply to meet anticipated demand. It is also consistent with the direction taken in the Spatial Plan to enable consolidated urban development within the existing urban area, at a higher density of development than is currently occurring.⁴⁹ Should these areas not be rezoned to allow for further infill development, then demand would have to be met elsewhere, either through other areas being zoned MRZ, or expansions outside the current urban boundary. Given the Spatial Plan considered other options, I consider that the areas identified for MRZ are the most appropriate.

Recommendation

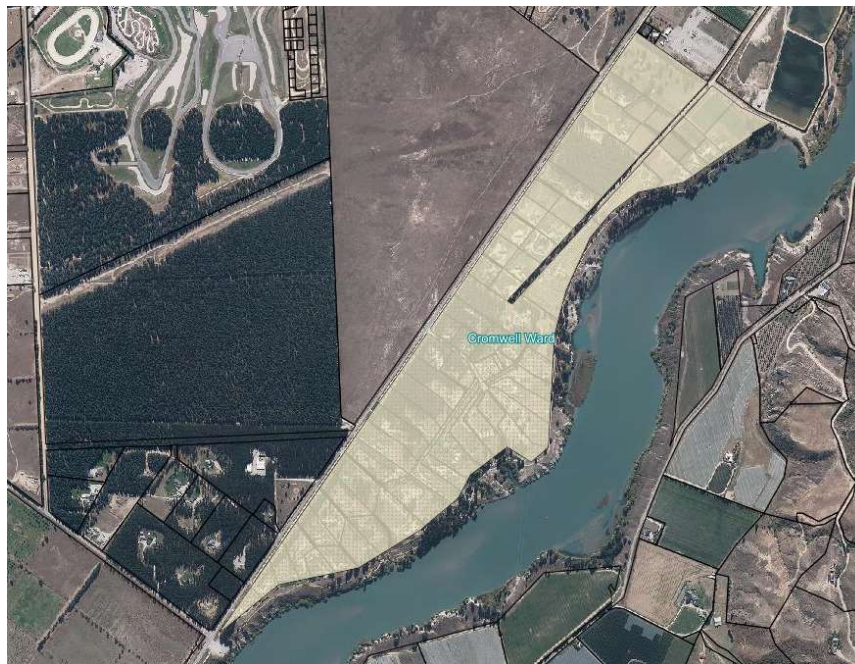
198. I recommend that the MRZ in Cromwell is retained as notified, except where recommended otherwise in this report.

⁴⁹ Cromwell 'Eye to the Future' Masterplan, Spatial Framework, Stage 1: Spatial Plan, 5 June 2019, page 22.

Bannockburn Road

Submissions

199. Alfred Lustenberger (#102) seeks that the land currently zoned Residential Resource Area 2 (RRA(2)) (land on the east side of Bannockburn Road to the Mohiki Reserve, opposite Pearson Road) is zoned to allow for development at a 2000m² density. The submitter considers that this would allow for natural growth and retain the present residential advantages without significant disadvantages. Graeme Pont (#90) opposes changes to the zoning of Woodfield Estate, on Bannockburn Road, as this results in the decrease in the density from 6000m² to 2000m², on the basis that it could compromise the character and amenity enjoyed by existing landowners in this area, and questions whether there is sufficient room for on-site servicing and additional traffic. He considers that the boundary between the areas should be to the north of Woodfield Estate, but also notes general objective to smaller lots sizes in general on Bannockburn and Richards Beach Roads.



Analysis

200. Because the current zoning of this land is not the equivalent of general rural or rural production, the site is not considered to contain highly productive land (under Clause 3.5(7) of the NPS-HPL) and therefore the NPS-HPL does not apply.
201. As shown in the figure above, PC19 proposes that the northern portion of this residentially zoned area is zoned LLRZ (where the minimum density is 2000m²), while the southern portion (shown with dots) is LLRZ Precinct 3 (where the minimum density is 6000m²). The current zoning is similarly split – with the northern area zoned Rural Residential, (where an average allotment size of 2ha is required, although I note there are a number of sections below this) and the southern portion is zoned RRA2 (which has a 4000m² minimum density, but with a 1ha average). Notwithstanding the difference in zoning, the size of sites in both areas is similar. The

Spatial Plan identifies both parts for Low Density development (applied in PC19 as LLRZ). I consider that given the density in these areas are already similar, it is appropriate to apply the same zoning to both areas. I understand this to be what is sought by both submitters, albeit Mr Pont would prefer (in effect) the application of LLRZ Precinct 3, which would limit the potential for additional sections to be created, whereas Mr Lustenberger would prefer LLRZ, which would allow for a greater level of infill.

202. In terms of supply, the capacity provided in Cromwell through PC19 is much higher than the forecasted demand. Additional infill is therefore not 'required' to provide for more supply. From an urban form perspective, the area is separate to the more central parts of the Township and is essentially a form of ribbon development. As such, further infill within this area would not, in my view, achieve 'consolidation' aims. My understanding is that this area is also serviced by on-site wastewater disposal systems.

Recommendation

203. I consider that this matter is finely balanced and comes down to whether the Hearings Panel consider it more appropriate to retain the existing amenity and character (i.e. applying LLRZ Precinct 3, and therefore aligning with the outcomes sought in LLRZ-O3) or whether it is appropriate to provide for opportunities for further infill development while still ensuring the density of development maintains a predominance of open space over built form (i.e. applying LLRZ and therefore aligning with the outcomes sought in LLRZ-O2).

Rezoning on Western Side of State Highway 6

Submissions

204. The Van der Velden Family Trust (#69) seek that 110 and 116 Kawarau Gorge Road (approximately 8.5ha) is zoned LLRZ (Precinct 3), as well as extending this zoning to the adjoining resthome. The site is currently zoned Rural Residential and was not proposed to be rezoned through PC19. The submitter considers that this rezoning would provide scope for residential development, in line with the scale of development of the neighbouring rest home, or to allow for the rest home to expand. They consider that LLRZ is more efficient than current Rural Residential zoning which in their view impedes growth and results in "*inferior development*".
205. Thyme Care Properties (#145) seek that 84 and 94 Kawarau-Gorge Road (approximately 4.9ha) and part of the adjoining lot is zoned MRZ, to expand their current site and develop the property in a manner which provides more flexible development opportunities. They consider that the site is close to the Town Centre of Cromwell and that the current rural residential zoning limits the development potential of the site and does not reflect the density of the existing residential

activities on the site. They further note that application of MRZ to the site would be consistent with another nearby retirement village.



Analysis

206. Because the current zoning of this land is not the equivalent of general rural or rural production, the site is not considered to contain highly productive land (under Clause 3.5(7) of the NPS-HPL) and therefore the NPS-HPL does not apply.
207. While as the crow flies the site may be close to the town centre, it is on the opposite side of the State Highway to the rest of the Township and there are no direct road connections. From an urban form perspective rezoning the site residential (whether LLRZ Precinct 3 or MRZ) would result in a shift in the current town boundary outside the current clear delineation provided by the State Highway. I consider that the form of growth was considered through the Spatial Plan process and note that this determined that urban growth should be consolidated within the existing urban area.⁵⁰ No urban design or landscape assessment has been provided with the submission to support what I consider would be a significant change to the rural/urban boundary. Similarly, no assessment has been provided of the potential traffic effects resulting from the rezoning sought. I note that Waka Kotahi is also opposed to the rezoning, as they state the rezoning is not anticipated by PC19 and consider that the effects of multi-lot development that could occur under the zoning sought has not been accounted for in infrastructure planning. While I accept that the current rest home is a more intensive use than other built form in the rural area, I do not consider it sufficient to justify the change sought, nor do I consider that simply because another resthome site is within an MRZ area, that any rest home should be zoned as such.

⁵⁰ Cromwell 'Eye to the Future' Masterplan, Spatial Framework, Stage 1: Spatial Plan, 5 June 2019, Page 22.

208. I also note that additional development is not required in Cromwell to meet the anticipated demand.

209. Ms Muir notes that while these sites could be serviced for water, they could only be serviced for wastewater in 2029, following specific upgrades being undertaken. I consider that if the zoning was otherwise appropriate, this could be addressed through application of an FGO to the site at this stage, or via a rule limiting any further development until after the specific upgrade identified by Ms Muir is undertaken. However, for the reasons outlined above, I do not support the rezoning.

Recommendation

210. I recommend that the Rural Residential zoning of 84, 94, 110 and 116 Kawarau Gorge Road is retained.

Golf Course

Submissions

211. Kathryn Adams (#149) seeks that the Cromwell Golf Course is rezoned MRZ. The submitter considers that development should be encouraged within the existing urban area, to avoid urban sprawl and the consequential reduction in productive land use and requirement for infrastructure upgrades. She also considers that the benefits provided by housing outweigh amenity effects on property owners who currently overlook green space.



Analysis

212. Most of this site was identified within the Cromwell Spatial Plan for medium density development, and therefore under Clause 3.5(7)(b)(i) of the NPS-HPL, the NPS-HPL does not apply. Ms Muir notes that while this area could be serviced for water, it could only be serviced for wastewater in 2029, following specific upgrades being undertaken. I consider that if the zoning was otherwise appropriate, this could be addressed through application of an FGO to the site at this stage, or via a rule limiting any further development until after the specific upgrade identified by Ms Muir is undertaken.
213. While the zoning was considered appropriate in the Spatial Plan, aligning with the intent of the Spatial Plan to consolidate urban growth within the existing urban area, I understand that the Golf Course land is subject to a lease which means that any residential zoning would not be able to be implemented in the short term. As such, while the Spatial Plan considers growth over a 30-year timeframe, as the lease will not expire during the shorter 10-year lifespan of the District Plan, the rezoning was not included in PC19. I consider this is appropriate, as the rezoning would not be able to be given effect to, and therefore the outcomes sought by the MRZ objectives would not be achieved.

Recommendation

214. I recommend that the Rural Resource Area zoning of the Cromwell Golf Course is retained.

15. Lowburn

Submissions

215. Three submissions have been received seeking the rezoning of additional land in Lowburn. These are set out below and analysed collectively.

216. A F King and Sons Ltd (#83) seek that the LLRZ (Precinct 2) zoning is expanded to the south of Lowburn as set out below. The site is currently zoned Rural Residential Resource Area. The submitter considers that residential activity is already anticipated on these sites as 4 building sites were approved through a subdivision consent granted in 2011, and considers the rezoning would enable further growth without compromising the landscape character of the settlement.



217. Lowburn Viticulture Ltd (#123) seek expansion of the LLRZ (Precinct 2) zoning to the north. The submitter states that the site possesses the same physical attributes as the adjacent residential zone and is visually contained within the same catchment, meaning that development would not compromise the landscape and amenity values of the surrounding area. This is supported by a landscape assessment provided with the submission. The submitter considers that the proposed boundary forms a clear and physical delineation between the residential environment and existing rural area. They state that three waters infrastructure is located within proximity of the site and consider that the site has little productive value due to a lack of infrastructure and water supply and its steep gradient.



218. Lakeside Christian Centre (#142) request that 60 Lowburn Valley Road be rezoned LLRZ (Precinct 1). This site is to the west of the current township, on the opposite side of Lowburn Valley Road. The submitter considers that the site provides a logical extension to the residential area, noting that it is accessible from Lowburn Valley Road, is serviced by Council's reticulated water system and is not within any SAL. The submitter considers that rezoning this land will supply additional residential or commercial opportunities in Lowburn, clustering development on the valley floor, and considers that productive uses of the site are not suitable due to the size and location of the site.



Analysis

219. The NPS-HPL does not apply to the A F King and Sons Ltd site, because it is not currently zoned the equivalent of general rural or rural production (rural residential being more akin to a rural lifestyle zone under the NP Standards).
220. The HPS-HPL is relevant to the other two sites, because their current zoning is Rural Resource Area. Approximately a third of the Lowburn Viticulture Ltd property, along the road frontage, is highly productive land under the NPS-HPL, as well as the entirety of the Lakeside Christian Centre site.
221. Clause 3.6(4) directs that the Council may allow urban rezoning of highly productive land only if the criteria (set out in full earlier) are met. This includes that the urban zoning is required to provide sufficient development capacity to meet expected demand for housing or business land in the district. The yield assessment undertaken by the Council does not include a specific assessment for Lowburn, due to its relatively small scale. Instead, this is included in the

calculations for the ward as a whole, which indicates that the supply provided through PC19 is anticipated to be more than sufficient to meet anticipated demand. I therefore do not consider the additional zonings would meet this test. Setting this aside, given the topographical and other constraints in this area, there does not appear to be any other reasonably practicable and feasible options for providing additional development capacity (in terms of expansion) which are outside an area of highly productive land. For the reasons set out in the submissions, I also agree that the benefits of these rezonings would likely outweigh costs associated with the loss of highly productive land for land-based primary production.

222. With respect to urban form, I consider that the Lowburn Viticulture Ltd property would provide a logical expansion to the current urban boundary and note that the impacts of this expansion have been assessed in detail and determined as being appropriate through the landscape assessment provided with the submission. Taking this assessment into account, I consider that the rezoning would be consistent with the current amenity and character of the township.
223. While I consider that this may also apply to the A F King and Sons Ltd site, I note that no specific assessment has been included with the submission to confirm this.
224. I note that the rezoning of the Lakeside Christian Centre site would result in urban zoning crossing over to the other side of Lowburn Valley Road, but that it would still be contained between the watercourse, Sugarloaf Drive and the existing community hall and playground. However, no landscape assessment has been undertaken to assess the appropriateness of this (although I accept the site is relatively small). It would also be inconsistent with the character of the current township to apply Precinct 1 (and therefore a higher density of development) to this site, given the rest of the settlement is proposed to be zoned LLRZ Precinct 2. As noted earlier, Precinct 1 has been applied to areas where this is generally consistent with the current zoning applied (RRA 3 and 10), to maintain the existing amenity and character. This does not apply to this site, where the proposed rezoning sought is a change to the current Rural zoning and therefore application of the lower density would not align with the objective (LLRZ-O3) which seeks to recognise and provide for maintenance of the amenity and character resulting from existing or anticipated development in the precinct areas.
225. The Spatial Plan did not identify any additional areas for growth in Lowburn, seeking that outlying settlements, such as Lowburn, are primarily retained as per their existing extent, to strengthen a compact pattern of development within existing Cromwell.⁵¹ Specific 'Key Moves' identified for Lowburn include supporting growth of housing balanced with the current section sizes and retaining the landscape character of the Lowburn valley and surrounding slopes.⁵² I consider that the Lowburn Viticulture Ltd property is generally consistent with this, but that a landscape analysis would be required to confirm this in relation to the other two sites. I consider application of Precinct 1 would in any case, not align with this direction, given it would not

⁵¹ *Cromwell 'Eye to the Future' Masterplan, Spatial Framework, Stage 1: Spatial Plan*, 5 June 2019; Vincent *Spatial Plan*, 4 April 2022, page 23.

⁵² *Cromwell 'Eye to the Future' Masterplan, Spatial Framework, Stage 1: Spatial Plan*, 5 June 2019; Vincent *Spatial Plan*, 4 April 2022, page 45.

continue to apply the current section sizes. The Key Moves also notes the opportunity to provide a more definitive arrangement to community activities and the potential to include a small retail space.⁵³ In relation to the Lakeside Christian Centre site, I consider this would be more appropriately considered when the Business framework and zoning is reviewed; or a resource consent could be sought for small-scale commercial development on this site.

226. Ms Muir identifies that these sites can be serviced for water, but that they could only be serviced for wastewater in 2029, following specific upgrades being undertaken. I consider that if the zoning of any of these sites was otherwise appropriate, this could be addressed through application of an FGO, or via a rule limiting any further development until after the specific upgrade identified by Ms Muir is undertaken.
227. Having considered all of the above, I consider that the key issue for the Hearings Panel is whether or not it is appropriate to provide for some additional growth at Lowburn. Regardless, I consider that in absence of evidence that additional zoning is required to provide sufficient development capacity to meet expected demand, that the Lowburn Viticulture Ltd property and Lakeside Christian Centre site are precluded from being rezoned due to the NPS-HPL; and that a landscape assessment confirming the appropriateness of the rezoning would be required for the A F King and Sons Ltd site and Lakeside Christian Centre site.

Recommendation

228. I recommend that the extent of the residential zoning provided in Lowburn is retained as notified.

⁵³ Cromwell 'Eye to the Future' Masterplan, Spatial Framework, Stage 1: Spatial Plan, 5 June 2019; Vincent Spatial Plan, 4 April 2022, page 45.

16. Pisa Moorings

Perriam Place

Submissions

229. RS Perriam (#137) seeks that the full extent of the site located at 1 Perriam Place and shown below, is zoned LLRZ (Precinct 1). The submitter notes that part of the land is zoned Rural Resource Area, which does not align with the Cromwell Spatial Plan, and reflects a historical anomaly.



Analysis

230. I agree with the submitter that the full site is captured in the Cromwell Spatial Plan (which also means the NPS-HPL does not apply), and it is not efficient to retain the split zoning over the site, given its location adjoining other residentially zoned sites, and given the zoning does not appear to line up with any topographical or other features. Given the limited size of the site, I do not consider that any servicing constraints arise from this.

Recommendation

231. I recommend that 1 Perriam Place is zoned LLRZ (Precinct 1).
232. In terms of s32AA of the RMA, I consider that zoning the full site is a relatively minor boundary adjustment, and is more efficient than the current split zoning of the site.

Land West of State Highway

Submissions

233. Wakefield Estates Limited (#138) seek the extension of LLRZ to land in the vicinity of Clark Road, Pisa Moorings, as shown below. This would consist of LLRZ adjacent to the State Highway (which applies a 2000m² minimum lot size) and LLZR (Precinct 1) for the remainder of the proposed area (which applies a 1000m² minimum lot size). Access for future development would be provided onto Clark Road, with land available for road widening on Clark Road, if required. The submitter states that the land is currently unproductive rural land, and in their view has clear topographical boundaries in the form of steeply rising hills to the north and west and Council owned land to the south. The submitter notes that the northern part of the site has obtained consent for seasonal workers accommodation for up to 60 people and contains a large commercial building. Historic gold workings are located outside the area proposed for rezoning. The submitter considers that residential development on the western side of the Highway has already been considered through the granting of the seasonal workers accommodation consent, and in their view this demonstrates that the rezoning would not result in urban sprawl. They also state that setbacks can be applied from the State Highway to ensure buildings are not dominant.



Analysis

234. I note that the site does not contain any highly productive land and therefore the NPS-HPL does not apply. The area sought to be rezoned is adjacent to, but outside an identified Outstanding Natural Feature. Ms Muir's evidence is that the site could be serviced for water after 2029 when the Cromwell and Pisa Water schemes are combined, and a new water take consent has been approved by the Regional Council. This could be serviced for wastewater after 2029 after nitrogen removal and increased treatment capacity has been constructed. I consider that if the zoning of this site was otherwise appropriate, this could be addressed through application of an FGO (rather than through a specific rule, given there is both a water and a wastewater constraint.)
235. I do not agree with the submitter that a resource consent for seasonal workers accommodation in a rural area contemplates a residential scale of development. Rather, I consider that the rezoning would result in the settlement spilling out to the west, rather than having a clearly

defined boundary along the State Highway. It is my view that this might be appropriate, if the land was necessary to meet demand, and other options were not available. However, I do not consider this to be the case, and therefore I do not support the rezoning as a result of the change it would have on the urban form of the Pisa Moorings township.

236. With respect to traffic effects, I note that Waka Kotahi is opposed to the rezoning, as they state the rezoning is not anticipated by PC19 and consider that the effects of multi-lot development has not been accounted for in infrastructure planning. While the submitter does comment on traffic effects, I note that a full traffic assessment of the proposed rezoning, and in particular the potential effects on the Clark Road/ State Highway intersection, have not been assessed. If the Hearings Panel otherwise considers the rezoning to be appropriate, I consider that the potential traffic effects require further consideration.

Recommendation

237. I recommend that the Rural Resource Area zoning of land to the west of Pisa Moorings is retained.

828 Luggate-Cromwell Road

Submissions

238. Wally Sanford (#144) considers that the *“spatial definition of the Large Lot (P1) to the west of Pony Court in Pisa Moorings needs to be more clearly defined or described as it does not appear to follow any cadastral, occupation or topographical features”*. While amendment is sought *“to better clarify the relevant owner’s property rights”* it is not clear what specific changes are sought.
239. Pisa Moorings Vineyard Ltd & Pisa Village Developments Ltd (#146) seek that a 24.3ha parcel of land, located at 828 Luggate-Cromwell Road (SH6), which is located between SH6 and the existing Pisa Moorings residential area, is rezoned to a mix of LRZ, MRZ and a local convenience

retail zone or precinct. The submitter states that this would facilitate the development of around 292 residential lots.



240. The submission contains a range of supporting assessments, including:
- a. A Planning Statement which summarises the technical assessments and provides an assessment of the effects of the rezoning
 - b. A Section 32AA Evaluation
 - c. Preliminary Infrastructure and Services Report
 - d. Transport Assessment
 - e. Landscape assessment
 - f. Acoustic assessment
 - g. Detailed Site Investigation

Analysis

241. I note that the site does not contain any highly productive land and therefore the NPS-HPL does not apply. The land is not subject to any identified features or overlays.
242. A recent yield assessment was undertaken for the Council, to provide yield calculations for PC19, to identify whether the proposed zonings would provide sufficient capacity for the forecasted demand (refer **Appendix 2**). This is, in effect, an update of the Cromwell Housing and Business Development Capacity Assessment, prepared in 2018 as part of the Cromwell Spatial Plan, and reflects that growth projections are now higher than they were in 2018, and that the PC19 zoning framework differs in some cases from the Spatial Plan. This recent assessment

demonstrates that at a ward level, there is sufficient housing supply for the forecasted demand. However, when looking more specifically at Pisa Moorings Township, there is insufficient supply to meet demand, with the PC19 zonings expected to provide 530 dwellings, which is a shortfall of 550 dwellings under the medium forecasted demand and 730 under the high forecasted demand by 2054.⁵⁴ My understanding is that there is a large surplus in Cromwell township, which could be used to meet the demand, but would result in ‘pushing’ growth to Cromwell. I therefore tend to consider that it is appropriate to consider additional zoning in Pisa Moorings, to provide for local demand.

243. From an urban form perspective, I consider the rezoning to be in a location that provides a logical extension of the current township, aligning the edge of the Township with the State Highway. This reflects the comments in the Landscape Assessment provided by the submitter that *“...the site forms somewhat of a ‘left-over’ piece of land between the established urban development and the state highway and is well contained by defensible edges (thus avoiding the risk of development creep).”*⁵⁵ I note that rezoning this site would also address the concerns of Mr Sanford that at present, the boundary between the proposed LLRZ (Precinct 1) and Rural Resource Area is not logically defined. Without repeating or summarising the detailed assessment provided with the submission, in summary I agree that the residential zoning (in a general sense) is appropriate, for the reasons summarised as follows in the s32AA evaluation in the submission:

- *It is adjacent to an established urban settlement.*
- *It is adjacent to existing reticulated water and wastewater and can be serviced.*
- *There are sufficient roading connections to the local road network and the ability to use an existing access onto SH6.*
- *The land has capacity for urban development and will not affect any significant amenity landscapes or ONL/F.*
- *The urban extension is a logical and contiguous extension of an established urban area, the proposed zoning is not a spot zone and is not isolated from existing urban areas.*
- *The proposed urban extension at Pisa Moorings is consistent with the Cromwell Spatial Plan, despite that Plan’s omission of the opportunities for growth at Pisa Moorings because the proposal consolidates an existing urban settlement. Objective 1 of the Spatial Plan states: Enable consolidated urban development, predominantly accommodating future growth within existing Cromwell (including the town centre and nearby localities) at a*

⁵⁴ It is noted that the original assessment included two areas where private plan changes were anticipated (“Cherry Orchard” and “Parkburn”). The addendum to this report (pages 22-26) provides an assessment of the yield without these areas, as they were not notified as part of PC19, and demonstrates insufficient supply in Pisa Moorings if no additional areas are rezoned.

⁵⁵ Section 1.4 of Document 5 to the Submission (*Central Otago District Council Plan Change 19 PISA MOORINGS REZONING, Landscape Comments*, September 2022.)

*higher density of development than is currently occurring. The extension of Pisa Moorings accommodates growth within a nearby locality to Cromwell, being land framed by the existing settlement and the State Highway.*⁵⁶

244. I further note that while the Spatial Plan does not identify this site for growth, it does seek that outlying settlements, such as Pisa Moorings, are primarily retained as per their existing extent, to strengthen a compact pattern of development within existing Cromwell.⁵⁷ I consider the change is broadly consistent with this as while the rezoning would change the existing rural/urban boundary, it consolidates or 'infills' the current urban form, rather than extending the town further north or west than its current extent. However I accept that this is a relatively large area of land, and it was not expressly anticipated in the Spatial Plan that the Township would grow in this manner. The 'Key Moves' for Pisa Moorings in the Spatial Plan included clearly delineating areas to be zoned for residential development, cognisant of the quarry area to the north, and to support infill housing within zoned areas, balanced with the current sections sizes and retaining the valued character of the township and the lakefront.⁵⁸
245. Ms Muir's evidence is that the site could be serviced for water after 2029 when the Cromwell and Pisa Water schemes are combined, and a new water take consent has been approved by the Regional Council, and for wastewater after 2029, after nitrogen removal and increased treatment capacity has been constructed. I consider that if the zoning of this site was otherwise appropriate, this could be addressed through application of an FGO at this time (rather than through a specific rule, given there is both a water and a wastewater constraint.)
246. I have also considered the technical assessments which were included with the submissions and consider that with the exception of the servicing matters noted above, there is nothing raised in these that precludes the rezoning of the site for residential purposes. While I note that Waka Kotahi opposes the rezoning, stating the rezoning is not anticipated by PC19 and that the effects of multi-lot development that could occur under the zoning sought has not been accounted for in infrastructure planning, I note that potential traffic effects have been identified in the traffic report provided with the submission. I consider that the recommendations in the technical reports generally deal with matters that are managed through the current Plan or PC19 framework, e.g. through consents required under the NES-CS, through more detailed consideration of subdivision applications and through land use rules such as acoustic insulation requirements. In this regard, I note that the traffic assessment does identify the extent of effects likely to arise from the rezoning, stating that these will be 'noticeable', but concludes that *"the proposed rezoning can be accommodated within the existing state highway infrastructure without the need for improvements"*.⁵⁹ I consider that this is a matter that can be further

⁵⁶ Section 2.3.9 of Document 2 to the Submission (*Pisa Moorings Rezoning, Pisa Moorings Vineyard Limited and Pisa Village Development Limited*, Section 32AA Evaluation, 1 September 2022).

⁵⁷ *Cromwell 'Eye to the Future' Masterplan, Spatial Framework, Stage 1: Spatial Plan*, 5 June 2019; *Vincent Spatial Plan*, 4 April 2022, page 23.

⁵⁸ *Cromwell 'Eye to the Future' Masterplan, Spatial Framework, Stage 1: Spatial Plan*, 5 June 2019; *Vincent Spatial Plan*, 4 April 2022, page 45.

⁵⁹ Page 9 of Document 4 to the Submission (*Pisa Moorings, Luggate-Cromwell Road (SH6) Proposed Zone Change, Access Assessment*, 30 August 2022).

considered at the time of subdivision, and conditions imposed as appropriate. This is likely to involve input from Waka Kotahi. I therefore do not consider that the potential traffic effects are sufficient to reject the rezoning.

247. I note the submitter also proposes a new policy applying to this site which would be included in the Residential Subdivision Chapter, as well as a matter of discretion applying to subdivision to require consideration of the structure plan. While I agree with having a policy which relates to the Structure Plan, I consider that the matters the proposed policy deals with are either those which are not required because they are not specific to the site, are otherwise covered by existing policy direction, or are matters that would sit better within the Structure Plan itself, particularly those which implement recommendations in the landscape report. My recommended changes, should the rezoning be approved, reflect this view.
248. With respect to *“Encouraging roofs to have a light reflectance value not greater than 30% to ensure buildings are not prominent in views from the wider rural area”*, while I appreciate that this was recommended in the landscape report, it is not clear to me if there is something specific about this site which makes this necessary, given it is not applied to other areas within the Pisa Moorings Settlement (or other townships where development may be visible from surrounding rural areas which are elevated). If it is required to appropriately mitigate effects resulting from the rezoning I consider it would be better applied as a land use rule in the LRZ and MRZ chapters, with the rule applying to the area identified in the Structure Plan.
249. In terms of provision for a local convenience retail zone, I note that PC19 only relates to residential areas and does not propose to alter the current Business Resource Area zonings or framework. I therefore consider any potential new business zoning in this area is better considered when the Business Resource Area is reviewed. This would also take into account the demand or necessity for provision of commercial development in this township, noting the submission does not include such an assessment. I also consider that application of a “precinct” with a retail function would not align with the NP Standards, which describe the MRZ, and LRZ as *“areas used predominantly for residential activities”*; with the types of activities anticipated by the proposed commercial precinct would in my view align instead with a commercial zoning, such as a neighbourhood centre or local centre zoning and it would therefore be inconsistent with the NP Standards to apply a precinct. Notwithstanding this, I note the types of activities anticipated by the submitter (local convenience retail activities, small scale education and community or commercial activities such as an early childhood education centre, medical consulting rooms and consulting services) could be considered by way of a resource consent under the LRZ or MRZ framework. Alternatively, the Hearings Panel may consider it more prudent to apply a Business Resource Area zoning to are identified in the submission as *“Convenience Retail and Mixed Use”* at this time, with the specific framework and zone reconsidered when the Business Resource Area is reviewed. In my view, the Hearings Panel would however need to be satisfied that it was appropriate to provide for commercial development in this location, including consideration of demand, and whether the limited scale of the area is sufficient to conclude that it would not undermine the role and function of the Business Resource Areas in Cromwell.

250. With respect to MRZ, I note that this is applied to areas within the larger townships of Alexandra, Clyde and Cromwell, and particularly in areas that are within a walkable distance of commercial areas or other key community facilities. The density is also higher than that currently anticipated in the surrounding area and therefore would result in a change in the character and amenity of the Township. I therefore have some concerns about whether the MRZ is a good fit within the Pisa Moorings township, and consider it may not align with the Key Move identified in the Spatial Plan. Notwithstanding this, I note that the submission proposes that the MRZ area would be located internally within the site, with LRZ adjoining the LRZ and LLRZ (Precinct 1) areas along the site's eastern boundary. MRZ would also provide a broader range of housing options within this settlement, which would assist in addressing one of the resource management issues PC19 seeks to address.⁶⁰ The submitter also proposes that development would be subject to compliance with a structure plan, which includes indicative roading and pedestrian networks and which I understand are integrated with a landscape master plan. I therefore consider that the inclusion of the MRZ zoning is finely balanced.

Recommendation

251. I recommend that a Future Growth Overlay is applied to 828 Luggate-Cromwell Road (SH6), with those areas set out in the submission as LRZ rezoned 'Future Growth Overlay - Low Density', and those areas set out in the submission as MRZ (including that area set out as a proposed Commercial Precinct) rezoned as either 'Future Growth Overlay - Low Density' or 'Future Growth Overlay - Medium Density'.

252. I do not recommend identification of a Commercial Precinct within the site, nor amending the PC19 provisions to incorporate such a precinct. The appropriateness of a more specific commercial zoning could however be reconsidered when the Business provisions are reviewed, or at the time the Future Growth Overlay is removed.

253. I recommend that the Structure Plan contained in Attachment B to the submission is inserted into the District Plan, subject to it being updated to:

- a. remove the "Convenience Retail and Mixed Use (CRMU)" area.
- b. remove the notations, other than the legend, on the right-hand side of the plan.
- c. add the following notations and related text to the legend:

Area	Legend Notation
Along the State highway interface	<i>Landscape and noise attenuation buffer (providing an integrated and cohesive approach to State Highway noise attenuation measures and the landscaping and planting design between the State Highway and dwellings.)</i>
Along the northern boundary	<i>Landscape buffer (to screen the development from adjoining quarry operations)</i>
Along the eastern terrace edge and the existing adjoining residential	<i>Planting to encourage privacy between properties, minimise the visual dominance of buildings and overlooking.</i>

⁶⁰ Refer *Central Otago District Plan, Plan Change 19 – Residential Chapter Provisions, Section 32 Evaluation Report*, at paragraph 57-59.

properties located off Stratford Drive, Pony Court and Missy Crescent	
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254. I recommend that the “Building Line Restriction (Flood Risk)” shown on the Structure Plan contained in Attachment B to the submission is added as a Building Line Restriction to the Planning Maps. I consider that this is necessary to support the delineation of this area on the Structure Plan.
255. I recommend the following policy is added to the Residential Subdivision chapter:
- Ensure that subdivision and development in any area to which a Structure Plan applies is developed in general accordance with the Structure Plan.*
256. I recommend that SUB-R4 is amended to add “Consistency with any Structure Plan included in this District Plan” to the matters of discretion.
257. In terms of s32AA of the RMA, I note that a detailed assessment is provided of this in the submission, and I generally agree with this, except in relation to the identification of a Commercial Precinct within the site and related provisions. I consider application of a precinct is not aligned with achieving the outcomes sought for the MRZ, and I do not consider the inclusion of a precinct and related provisions to be consistent with the requirements of the NP Standards. I consider that the lack of servicing available to support the zoning of this site precludes the ability to rezone it in full now, but given that these matters are expected to be resolved in time, I consider that application of a Future Growth Overlay is appropriate and would allow for infrastructure planning to be integrated with development of this site. Notwithstanding that the FGO would need to be lifted before development could occur, I consider that it is more efficient to include the Structure Plan and related provisions at this time.
258. With respect to the changes I have recommended to the provisions, I do not consider that they generally alter the intent of what is sought by the submitter and therefore their s32AA assessment is still relevant in a broad sense. However I consider that the alternate drafting approach is a more efficient and effective way to achieve the outcomes sought.

Parkburn Quarry

Submissions

259. Fulton Hogan (#164) seeks that 922 Luggate-Cromwell Road (refer below) is included in a Future Growth Overlay or zoned a mix of LRZ and MRZ. They consider that this will enable appropriate re-use of the industrial quarry to a revitalised brownfield urban development, which will also assist in meeting the shortfall of urban zoned land within the Cromwell Ward and addressing housing affordability issues.



Analysis

260. Since the notification and submission period on PC19, Fulton Hogan Limited has lodged a private plan request (PC21) to rezone this area, which includes detailed technical assessments. Given that the private plan change has been accepted by the Council for notification and is therefore working its way through the statutory process, and that no technical information was supplied in support of the rezoning sought (with that submitted as part of PC21 not being before this Hearings Panel) I recommend that the submission in relation to PC19 is rejected, and the rezoning instead considered through the PC21 process.

Recommendation

261. I recommend that the Rural Resource Area zoning of 922 Luggate-Cromwell Road is retained as notified (noting that the zoning will be considered further through PC21).

17. Other

Building Line Restrictions

Submissions

262. Three submitters⁶¹ seek that the 30m Building Line Restriction from the State Highway is deleted from the planning maps, as they state that the setback is not included in the PC19 provisions and they consider it is effectively superseded by LLRZ-S5, LRZ-S5, MRZ-S5. Wooing Tree Development Partnerships Limited (#79) support the use of the Building Line Restriction to provide an appropriate buffer between development and the State Highway, rather than using a Rural Zoning to achieve this. However, they seek that the Building Line Restriction is moved such that it aligns with the buffers that have been consented through the Fast-Track consenting process. They also seek that an additional Building Line Restriction is added along the boundary of Wooing Tree Estate to similarly reflect that agreed through the Fast-Track consenting process.

Analysis

263. Under the current Plan, Standard 7.3.6(xii)(a) and (b) apply acoustic requirements within 80m of the State Highway to RRA(3) and (11) in the Wooing Tree Overlay Area and RRA (13). This is reflected in rules LLRZ-S5, LRZ-S5, MRZ-S5, albeit they are proposed to apply to any residential areas within 80m of a State Highway. Standard 7.3.6 (iii)(d)(ii) also specifically requires a 30m setback in RRA(6) from State Highways. This is not replicated in the PC19 setbacks applied to either the LRZ or LLRZ, but the acoustic insulation requirements will apply to properties previously affected by Standard 7.3.6 (iii)(d)(ii). Notwithstanding this particular rule, the Building Line Restriction notation on the planning maps is more specifically related to Rule 12.7.7, which restricts building being erected within any Building Line Restriction shown on the planning maps between the identified Building Line and the feature to which it relates. Where buildings are proposed within this area, resource consent is required as a restricted discretionary activity, with matters of discretion which extend beyond those addressed in LLRZ-S5, LRZ-S5, MRZ-S5. I therefore do not agree with deleting the Building Line Restriction in total from the planning maps because the effect of this would be that Rule 12.7.7, which was not part of the scope of PC19, would not apply.
264. With respect to altering the line to accord with the Fast-Track consenting process, I am not sure how necessary this is, given that the consent already authorises a breach of this rule. My understanding is that the consent, while authorising such a breach, has considered this as part of a package of bulk and location measures. Therefore I am hesitant to remove the Building Line Restriction, given this could start to unpick the package of measures considered through the Fast-Track consent and given it seems unnecessary in any case.

Recommendation

265. That the Building Line Restriction which applies within 30m of the State Highway is retained.

⁶¹ #21 - Brian De Geest, #31 - Goldfields Partnership, #51 - D & J Sew Hoy, Heritage Properties Ltd

Millers Flat

Submissions

266. Geoffrey James & Margaret Anne Pye (#11) seek that 18, 20, 43 Craig Flat Road, Millers Flat, are included in the Millers Flat Residential Resource Area. Given PC19 proposes to delete the Residential Resource Area and generally replace it with the LRZ, it is assumed that LRZ is sought to be applied to these properties.



Analysis

267. The site does not contain any highly productive land, and therefore the NPS-HPL does not apply to it.
268. I note that the majority of the area sought to be rezoned is identified in the Plan as Flood Prone. Objective 17.3.1 seeks that the adverse effects of hazards are avoided or mitigated to limits acceptable to the community, Policy 17.4.2 directs that the vulnerability of the land to hazard events is taken into account when managing land uses in particular areas and Policy 17.4.3 directs that subdivision and erection of buildings is restricted in areas where there is a reasonable probability that a hazard may cause material damage. Given the Flood Prone notation, under Rule LRZ-R18, the erection of any building within this area would be non-complying. I therefore do not consider it appropriate to zone the site LRZ, which would imply a

scale of development was anticipated across the site, which would in effect be precluded through Rule LRZ-R18.

269. As noted earlier, PC19 is intended to implement the zoning proposed in the Vincent and Cromwell Spatial Plans. As PC19 also proposes to make a suite of changes to the way the District's residential areas are zoned and managed, including applying zones required under the NP Standards, PC19 also proposes to apply these zones to other residential areas of the District to which the Spatial Plans do not apply to. However, in absence of a spatial plan, the extent of the current Residential Resource Area zonings outside the Vincent and Cromwell Spatial Plan areas has not been reviewed. This includes Millers Flat. I understand that a Spatial Plan is being prepared for Teviot which will identify anticipated demand in this ward, and consider what additional zoning may be required to meet this demand. I consider that rezoning of this site is better considered through that process and any subsequent plan change that may be proposed, albeit noting my comments above about the likely unsuitability of rezoning flood prone areas.

Recommendation

270. I recommend that the Rural Resource Area zoning of 18, 20, 43 Craig Flat Road, Millers Flat, is retained.

Ranfurly

Submissions

271. John Elliot (#81) seeks that approximately 19ha of land to the north of the current Ranfurly settlement be rezoned LRZ. The submitter considers that the site is centrally located and within walking distance to commercial and community facilities, noting that Council services are located in front of the site. He states that it is difficult to use land for productive purposes due to the close proximity to existing urban areas and limited infrastructure, noting that unformed legal roads located within the site also affect how the land can be used. The submitter states that the existing boundary does not follow any logical pattern, and the expansions would fit generally within the limits of the current Township.



Analysis

272. The NPS-HPL does not apply to the land in question, because it is not currently zoned the equivalent of general rural or rural production (rural residential being more akin to a rural lifestyle zone under the NP Standards).
273. From an urban form perspective, I tend to agree with the submitter that the current boundary between the residential and rural area appears arbitrary, and the current boundary is further south than on the eastern and western sides. I consider that there is merit in rezoning the full area north of Caulfield Street until at least the unformed portion of Welles Street as this results in a more consistent urban/rural boundary and allows for some opportunities for further residential development of the township in a location where this is consistent with the surrounding area. I consider that extending this further north to the unformed portion of Knox Street is finely balanced, given this would extend the urban boundary slightly further north than the site to the west, and consider that while generally appropriate location for growth, it has not been demonstrated that this amount of land is required to meet demand. With respect to the portion north of Knox Street, I do not consider this to be appropriate at this time, given this would result in the urban boundary being further north than it is to the west or east and therefore would not assist in better rationalising the current urban/rural boundary, and given this would result in a much more intensive form of residential development being located near

an area zoned industrial. It would also result in a large supply of land when considering the current size of Ranfurly.

274. Ms Muir identifies that the Ranfurly wastewater scheme has capacity to accommodate further growth, but that there are limitations on the ability to provide water supply to more properties in Ranfurly. She states that the area up to Welles Street could be supplied water, but capacity to supply water beyond Welles Street is uncertain.

Recommendation

275. I recommend that area to the north of Caulfield Street, up to the unformed portion of Welles Street is zoned LRZ. In terms of s32AA of the RMA, I consider that zoning additional land has benefits in providing a modest amount of additional land for residential development, in an area where such expansion is consistent with the surrounding area. I consider the costs associated with the impacts of increased development are outweighed by the benefits.
276. I recommend that the remaining area to which the submission relates is retained as Rural Residential Resource Area at this time.

Tarras

Submissions

277. Billie Marsh (#116) notes that PC19 does not propose to alter the current Rural Settlement zoning, but asks that possibility of residential zoning of Tarras is considered in future.

Analysis

278. As noted by the submitter, PC19 does not relate to the Rural Settlement Framework, nor does it propose changing the Rural Settlement zoning in Tarras to one of the residential zones introduced in PC19. I consider that any changes to the zoning in Tarras are a matter for the Council to consider and address in future spatial planning and plan change processes.

Recommendation

279. I recommend that the current Rural Settlement zoning in Tarras is retained.

18. Conclusion

280. For the reasons set out in this report, I recommend that the zonings proposed in PC19 are retained, except where changes are recommended in this report. These changes are either minor boundary changes and therefore consistent with the original s32 evaluation, or a further evaluation under s32AA has been set out in this report.



Liz White

1 May 2023

Appendix 1 – List of Recommended Zone Changes

Submitter	Site Address	Proposed Zone in PC19	Recommendation (in this report)
NR Murray (#36)	51, 65, 72, 85 Graveyard Gully Road	Large Lot Residential	Rural Resource Area
Foodstuffs (#61)	32 and 34 Kenmare Street	Low Density Residential	Medium Density Residential
Aidan & Philippa Helm (#130)	129 Gilligans Gully Road (part only)	Rural Residential Resource Area	Large Lot Residential
Landpro (#150)	48 & 50 Lynn Lane, and those parts of 69 Hall Road which are currently zoned RRA(4)	Rural Resource Area	Large Lot Residential
Goldfields Partnership (#31)	Western side of Waenga Drive	Medium Density Residential / Low Density Residential	Amend boundary between the LRZ and MRZ so that it runs parallel from where it currently adjoins Waenga Drive, out towards Ripponvale Road
Foodstuffs (South Island) Properties Ltd (#62)	182 Waenga Drive (part only)	Medium Density Residential	Business Resource Area
Keyrouz Holdings Limited (#125)	Land on the south-western corner of Barry Avenue and State Highway 8	Medium Density Residential / Low Density Residential	Business Resource Area
RS Perriam (#137)	1 Perriam Place	Large Lot Residential (Precinct 1) (in part) Rural Resource Area (in part)	Large Lot Residential (Precinct 1)
Pisa Moorings Vineyard Ltd & Pisa Village Developments Ltd (#146)	828 Luggate-Cromwell Road (SH6)	Large Lot Residential (Precinct 1) (in part) Low Density Residential (in part) Rural Resource Area (in part)	Future Growth Overlay - Low Density Residential (<i>and potentially Future Growth Overlay - Medium Density Residential (in part)</i>)
John Elliot (#81)	The block between Caulfield Street, Welles Street, Dungannon Street and Northland Street	Rural Residential (in part) Low Density Residential (in part)	Low Density Residential

Cromwell Yield Assessment

September 2022



Document Title:

Cromwell Yield Assessment

Prepared for:

Central Otago District Council

Quality Assurance Statement

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Executive Summary

Rationale was engaged by CODC to produce yield calculations for Plan Change 19 (PC19) as well as some private plan changes in the Cromwell Ward. The purpose was to determine whether these plans provide sufficient capacity for the forecasted demand.

The yield calculations were completed using the same methodology as that used in the Vincent Spatial Plan. Parcels of land were divided into Small Lots, Large Lots, and Greenfields in relation to their size compared to the minimum lot size. An infrastructure allowance was provided for in the Greenfield parcels. Development feasibility parameters were calibrated by taking Cromwell's current Low and Medium density zones as realistic levels of development. Three additional plan changes were included in the yield calculation: the Golf Course in Cromwell, Cherry Orchard in Pisa Moorings and Parkburn in Pisa Moorings.

The resulting yield calculations suggest that PC19 in conjunction with the private plan changes provide sufficient housing supply for the forecasted demand at a Ward level. Assessment at a township level shows that in both Cromwell and Pisa Moorings the forecasted supply outpaces the demand, while the opposite is true in Bannockburn.

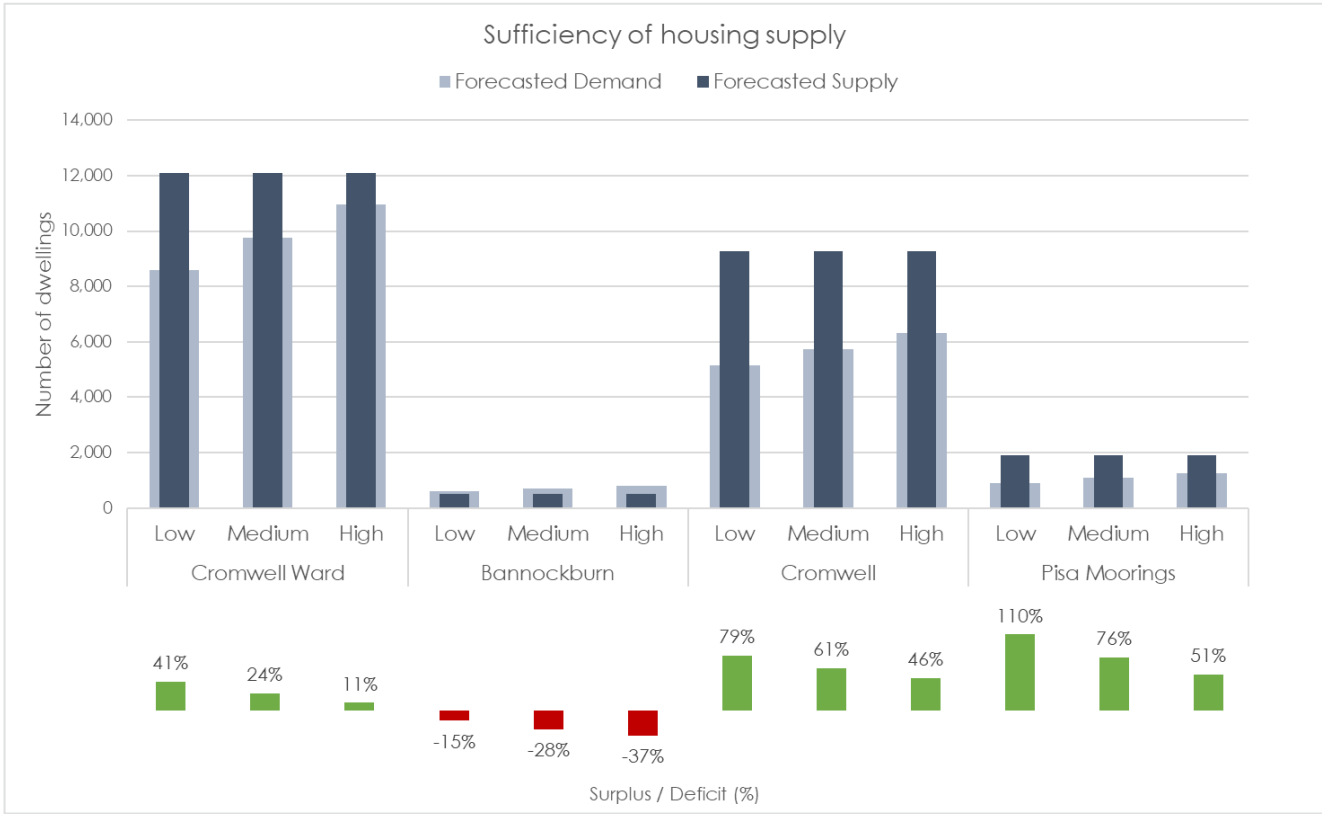


Figure 1: Sufficiency of housing supply in Cromwell Ward

1 Purpose

A Cromwell Housing and Business Development Capacity Assessment was prepared in 2018 to support the Cromwell Spatial Framework. The spatial framework recommended changes that would enable over 20,000 houses with a likely feasible capacity assessed at around 10,000 houses. The demand at the time was only forecast to be around 7,700 houses in 2048, meaning sufficient capacity was being proposed.

The latest growth projections suggest a demand for around 9,700 houses in 2054 for the Cromwell Ward, putting the sufficiency of housing at risk.

Further to this there have been a number of changes from the zoning recommendations in the spatial framework that will further affect the supply of housing, that need to be tested. A key one of these is the potential development of the golf course land which is now considered less feasible, resulting in a potential reduction of around 800 houses.

2 Methodology

2.1 Overview

The model used to calculate housing yield is the same as that used for the Vincent Spatial Plan and is summarised in the diagram below. It is based on classifying land parcels into the following categories:

- Brownfield - Small lots: sections smaller than the 2x min. lot size
- Brownfield - Large lots: sections up to 10x the min. lot size
- Greenfield: sections larger than 10x the min. lot size

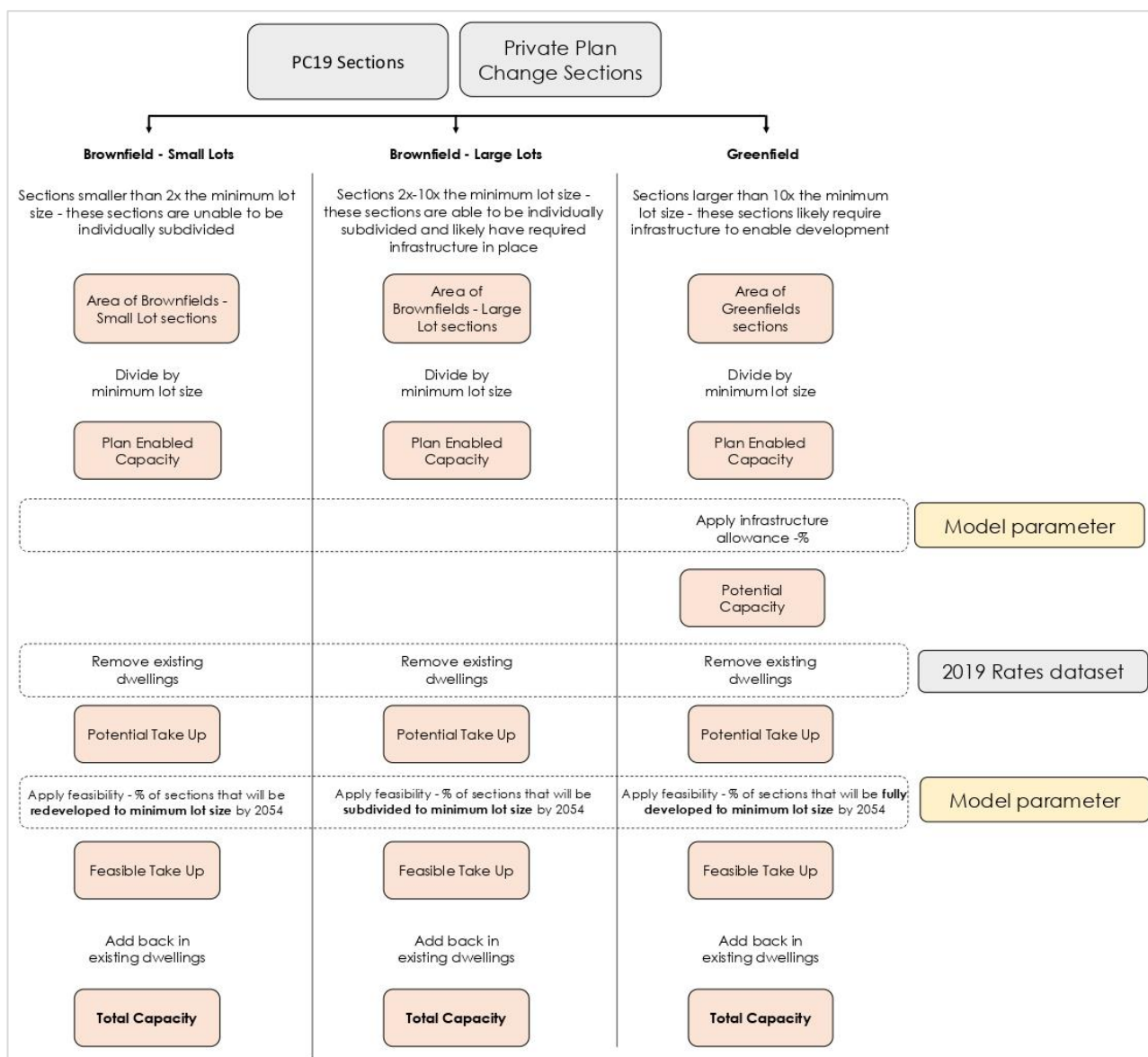


Figure 2: Overview of methodology for yield calculation

2.2 Plan Change 19

PC19 has six distinct zoning categories, with the following minimum lot sizes.

Table 1: PC19 Zones

Zone	Minimum lot size (m ²)
Medium Density	200
Low Density	500
Large Lot	2,000
Large Lot (P1)	1,000
Large Lot (P2)	3,000
Large Lot (P3)	6,000

CODC provided Rationale with the new zoning spatial data which was further enriched with location data using GIS software to enable summaries at a township level. Township boundaries are shown in Appendix A. There were 8 parcels where the zoning was ill-defined as the zoning boundary change cut across them. In all these instances, the higher density zone has been assumed.

A Rates dataset as of 2019 was also used in order to estimate the number of dwellings in each area of interest. Dwellings were estimated from "Residential" and "Lifestyle" rating units using the number of water and wastewater connections. The estimates obtained align reasonably well with the starting point of the Growth Projections, which is in turn derived from Stats NZ figures. The only area which showed significant discrepancy was Pisa Moorings, which is partly attributable to the definition and exclusion of commercial accommodation under Stats NZ figures, whereas in the Rates dataset some of these properties are still accounted for as Residential.

2.3 Additional Plan Change Areas

Three additional plan change areas were identified for inclusion into the yield calculation:

- Golf Course: around 330,000 m² in Cromwell assessed as Low Density.
- Cherry Orchard: around 240,000 m² in Pisa Moorings assessed as Low Density.
- Parkburn: around 990,000 m² in Pisa Moorings assessed as Low Density.

Outlines of the boundaries for each of these can be found in Appendix B.

2.4 Model Parameter Calibration

Infrastructure allowance percentages were set following the same methodology as used in the Vincent Spatial Plan, allowing 20% to 30% for infrastructure development in Greenfield lots.

Feasibility percentage calibration was carried out by using current percentage developed rates in Cromwell township as reference of realistic levels of development. The targeted percentage developed rates were 80% for Low Density and Large Lot, and about 60% for Medium Density, as highlighted in the table below. Large Lot (P1), (P2) and (P3) were set to very low feasibility percentages as very little further development is expected in them.

Table 2: Current percentage developed rates

Township	Brownfields - Small Lots	Brownfields - Large Lots	Greenfields
Bannockburn			
Large Lot	88%	31%	11%
Large Lot (P2)		0%	
Large Lot (P3)	0%	0%	
Cromwell			
Medium Density	60%	26%	1%
Low Density	79%	25%	2%
Large Lot	55%	34%	3%
Large Lot (P3)	77%	42%	
Pisa Moorings			
Low Density	65%	47%	0%
Large Lot (P1)	86%	19%	5%

Rural			
Large Lot			0%
Large Lot (P2)	58%	7%	3%

Table 3: Calibrated model parameters

Lot Classification and Zone	Infrastructure Allowance	Feasibility
Brownfields - Small Lots		
Medium Density	-	10%
Low Density	-	5%
Large Lot	-	2%
Large Lot (P1)	-	2%
Large Lot (P2)	-	2%
Large Lot (P3)	-	2%
Brownfields - Large Lots		
Medium Density	-	50%
Low Density	-	73%
Large Lot	-	70%
Large Lot (P1)	-	2%
Large Lot (P2)	-	2%
Large Lot (P3)	-	2%
Greenfields		
Medium Density	30%	60%
Low Density	30%	80%
Large Lot	20%	78%
Large Lot (P1)	20%	1%
Large Lot (P2)	20%	2%
Large Lot (P3)	20%	2%

3 Demand

The 2022 Growth Projection Review completed by Rationale for CODC was used as a forecast of housing demand needs in the Cromwell Ward. These projections estimate growth in Cromwell Ward to be more rapid than the rest of the district, with the medium forecast indicating 5,092 new dwellings required by 2054.

The table below provides a summary of the growth projections at the Ward level. More detailed results can be accessed in the Growth Projections – 2022 report.

Table 4: 2022 Growth Projections Review - Cromwell Ward Summary

	Historic Growth (2006 - 2021)			Short Term Forecast (2021 - 2034)			Long Term Forecast (2034 - 2054)		
	Total Growth	Av. Annual Growth	Av. Annual Growth Rate	Total Growth	Av. Annual Growth	Av. Annual Growth Rate	Total Growth	Av. Annual Growth	Av. Annual Growth Rate
Usually Resident Population	4,820	321.3	4.6%	4,362	335.6	2.9%	6,320	316.0	1.9%
Total Dwellings	1,694	112.9	3.1%	2,078	159.9	2.9%	3,013	150.7	1.9%
Total Rating Units				2,238	172.1	2.7%	3,258	162.9	1.8%
Residential and Lifestyle Rating Units				2,078	159.9	3.0%	3,013	150.7	1.9%

The figure below shows that majority of new dwellings are forecasted within Cromwell, as expected. However, there is also large growth forecasted to occur within rural areas. It is important to note that in these projections, the distribution of growth within the Ward is based on how growth has been occurring in recent years, but this apportionment may well change as urban towns grow in scale.

For the purposes of this assessment, 90% of the demand growth forecasted in rural areas has been shifted to occur within Cromwell, as advice from CODC suggests this reflects a more realistic scenario in line with the Council's long term growth strategies.

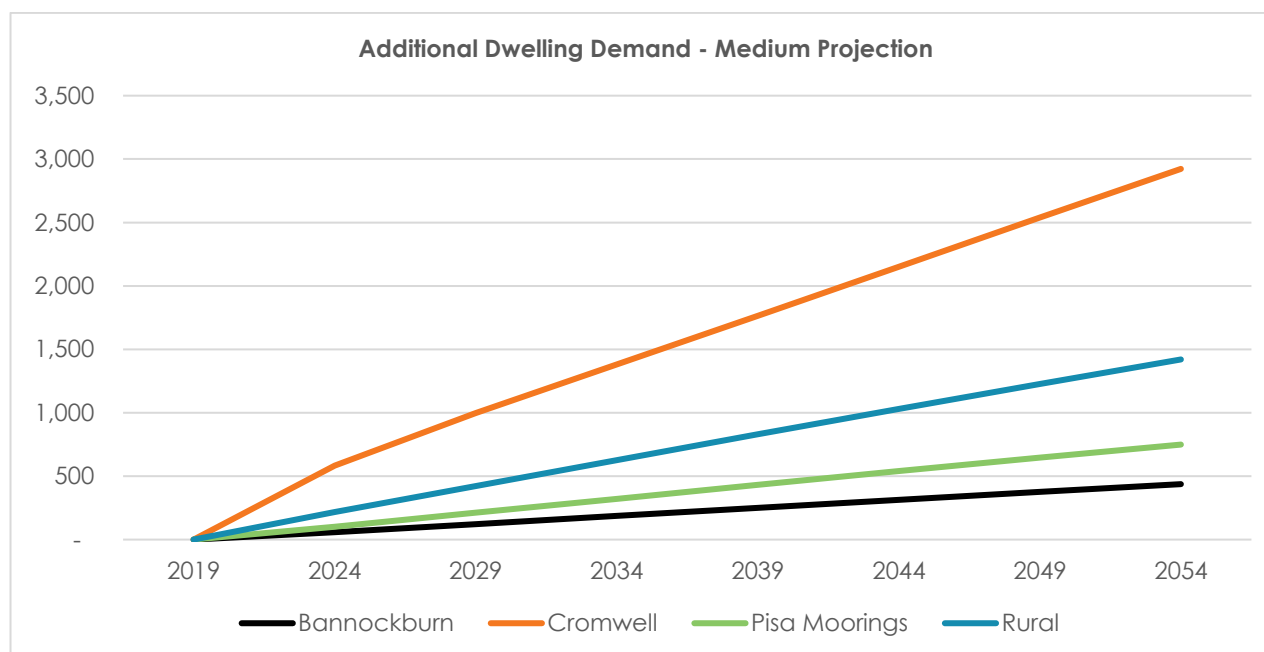


Figure 3: Additional Dwelling Demand by Township - Medium Projection

4 Supply

As discussed in Section 2, parcels of land were classified into Brownfields – Small Lots, Brownfields – Large Lots and Greenfields before the yield calculations were carried out.

Appendix C provides a breakdown of the almost 1,100 HA included in PC19 and the additional plan change areas. The following remarks are made:

- Cromwell contains about 60% of the plan's area, with the majority of lots being zoned as Low and Medium Density.
- Bannockburn is entirely zoned as Large Lot and makes up 13% of the plan's area.
- Pisa Moorings holds 22% of the area and is almost equally divided into Large Lot (P1) and Low Density zoning.
- PC19 does not provide zoning for much of the rural areas, making up only 5% of the plan's area, and most of it being zoned as Large Lot (P2).

The following table presents the resulting yields by area and zone. As expected, most of the additional capacity resides in Cromwell, followed by Pisa Moorings.

Table 5: Yields by Township and Zone

Township and Zone	Existing Capacity	Potential Capacity	Feasible Capacity	Additional Capacity	Current % Developed	Projected % Developed	Dwellings per HA
Bannockburn	267	612	507	240	44%	83%	3.5
Large Lot	240	579	480	240	41%	83%	3.7
Large Lot (P2)	-	18	0	0	0%	2%	0.1
Large Lot (P3)	-	15	0	0	0%	2%	0.0
Outside	27		27				
Cromwell	3,056	12,701	9,262	6,206	24%	73%	14.1
Large Lot	73	315	250	177	23%	79%	3.6
Large Lot (P3)	40	64	40	0	63%	63%	1.1
Low Density	2,042	6,818	5,470	3,428	30%	80%	13.1
Medium Density	799	5,504	3,399	2,600	15%	62%	25.5
Outside	102		102				
Pisa Moorings	498	2,884	1,907	1,409	17%	66%	7.8
Large Lot (P1)	416	1,012	423	7	41%	42%	3.7
Low Density	82	1,872	1,483	1,401	4%	79%	11.3
Outside	-		-				
Rural	420	163	428	8	258%	263%	8.4
Large Lot	-	8	6	6	0%	78%	3.1
Large Lot (P2)	56	155	58	2	36%	37%	1.2
Outside	364		364				
Grand Total	4,241	16,360	12,104	7,863	26%	74%	11.0

The figure below shows the resulting percentage developed rates by Zone. As discussed in Section 2, Low Density and Large Lot zones have been calibrated to yield 80% developed rates, while Medium Density zones have been calibrated to just over 60% and Large Lots (P1), (P2) and (P3) have been severely restricted.

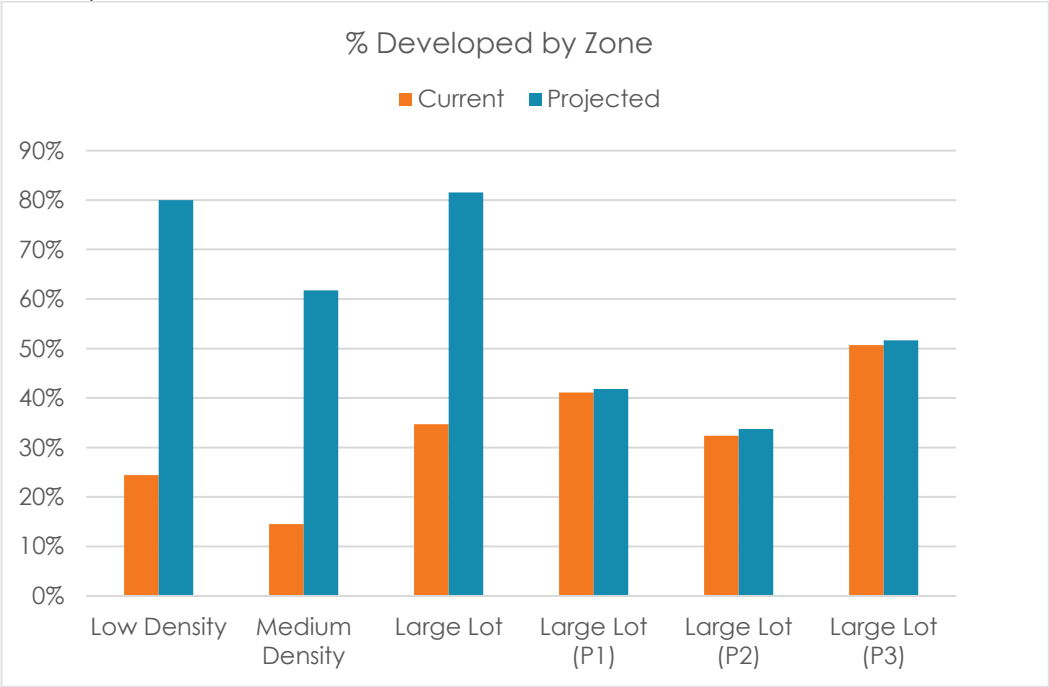


Figure 4: Percentage Developed Rates by Zone

5 Demand vs Supply

5.1 Cromwell Ward

At a Ward level, there is confidence that PC19 alongside the additional plan change areas will be sufficient for current forecasted housing demand. The forecasted supply of over 12,000 dwellings represents a surplus of 24% over the Medium forecasted demand, and 11% over the High forecasted demand.

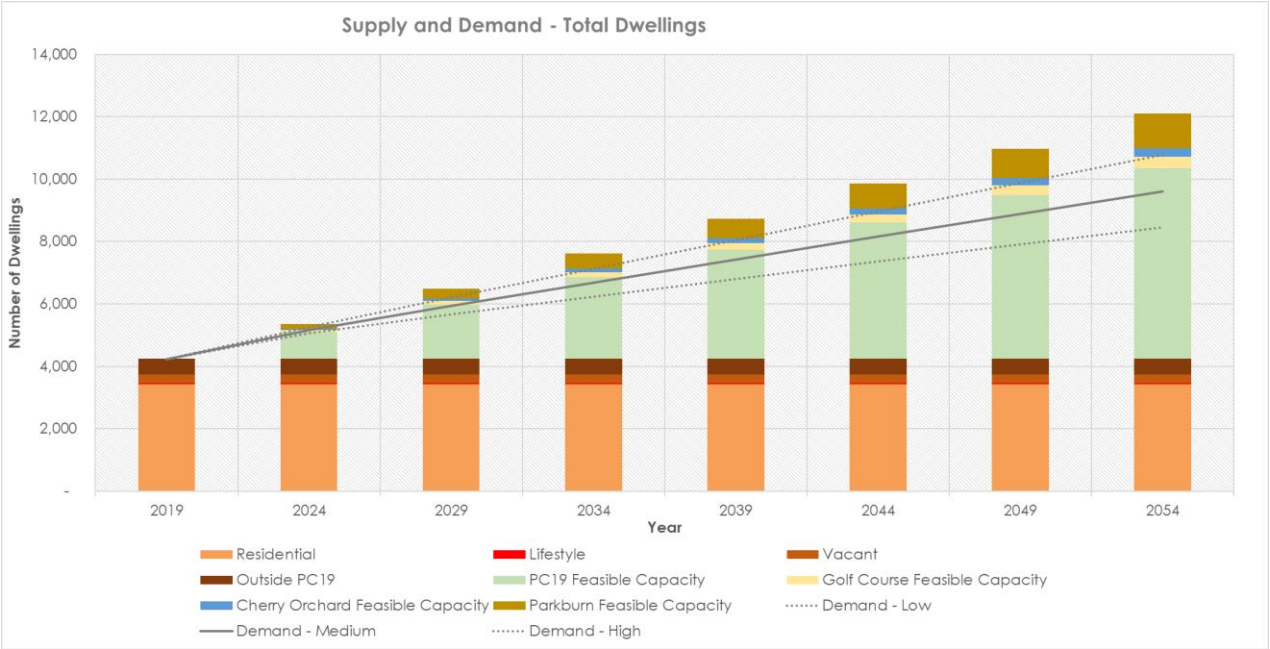


Figure 5: Cromwell Ward Demand vs Supply

5.2 Bannockburn

Current growth projections have moderate growth occurring within Bannockburn, while PC19 does not provide much scope for growth with all the zoning in this township being Large Lots. The forecasted supply of just over 500 dwellings represents a deficit of 28% under the Medium forecasted demand, and 37% under the High forecasted demand.

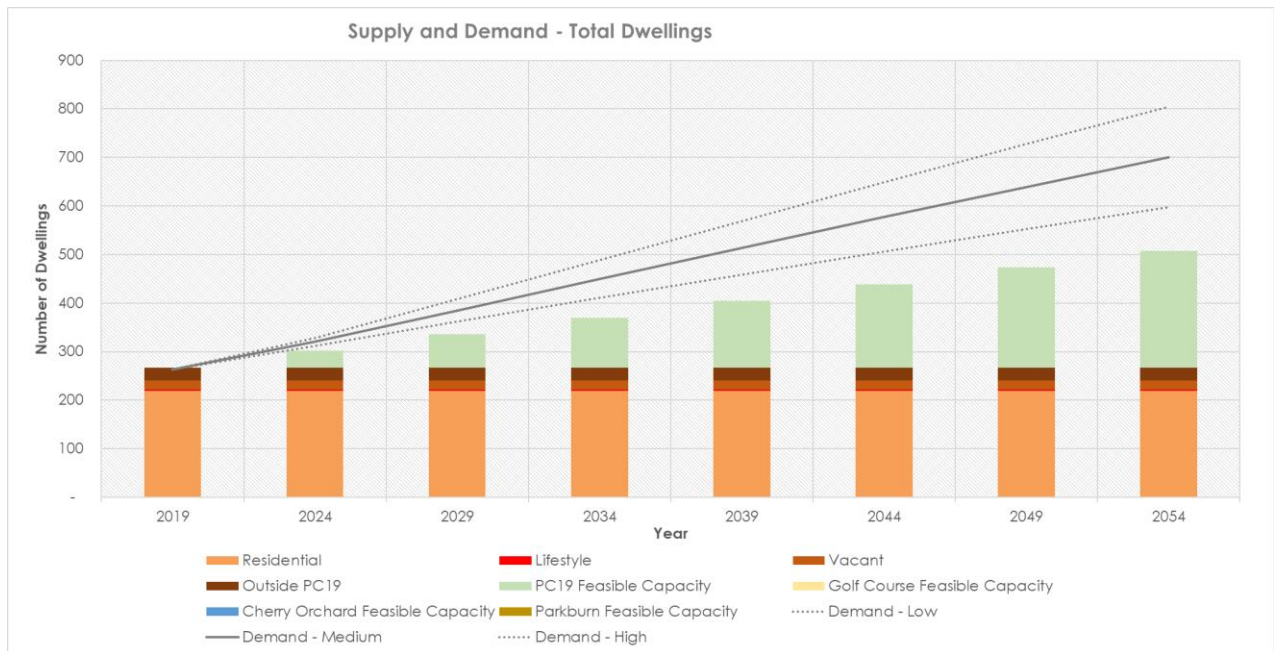


Figure 6: Bannockburn Demand vs Supply

5.3 Cromwell

PC19 has large areas of low and medium density zoning in Cromwell which allow for large growth in capacity. The forecasted supply of over 9,000 dwellings represents a surplus of 61% over the Medium forecasted demand, and 46% over the High forecasted demand. This massive surplus is expected to cover most of the deficit seen in Bannockburn, with large housing supply driving a shift to greater growth rates within Cromwell township.

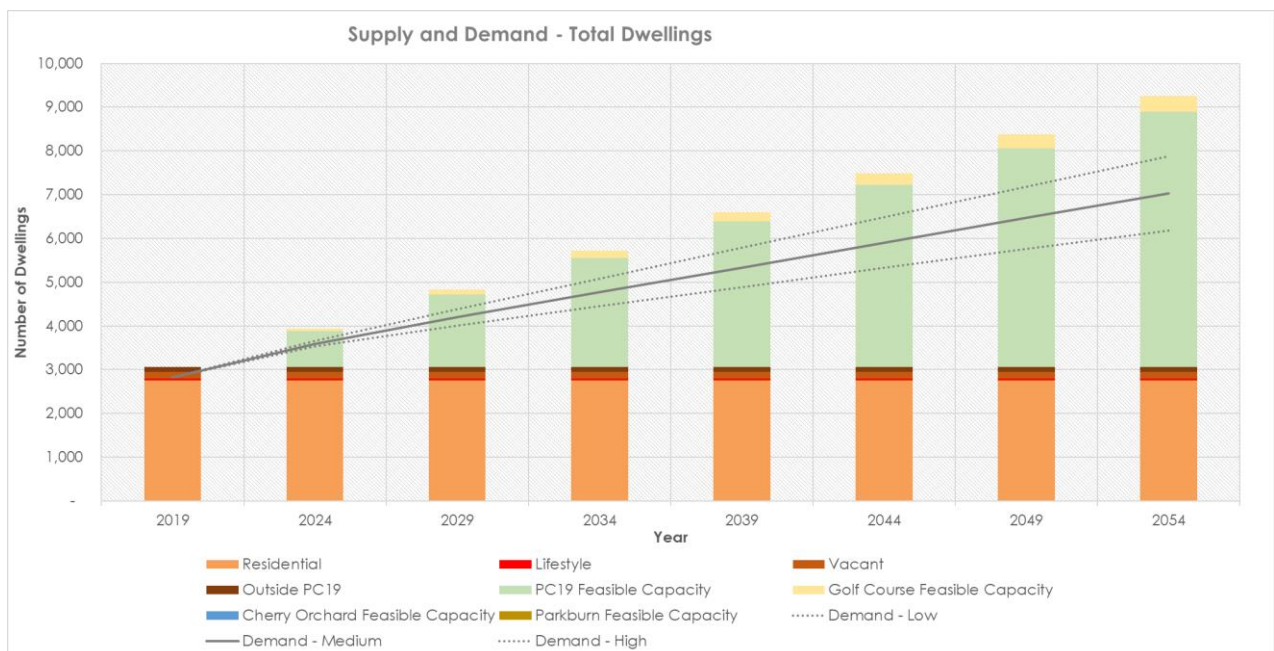


Figure 7: Cromwell Demand vs Supply

5.4 Pisa Moorings

Pisa Moorings additional feasible capacity is almost entirely composed of development in the additional plan change areas: the Cherry Orchard and Parkburn lots. The forecasted supply of over 1,900 dwellings represents a surplus of 76% over the Medium forecasted demand, and 51% over the

High forecasted demand. This provides room for Pisa Moorings to adopt some of the remaining growth in surrounding rural areas.

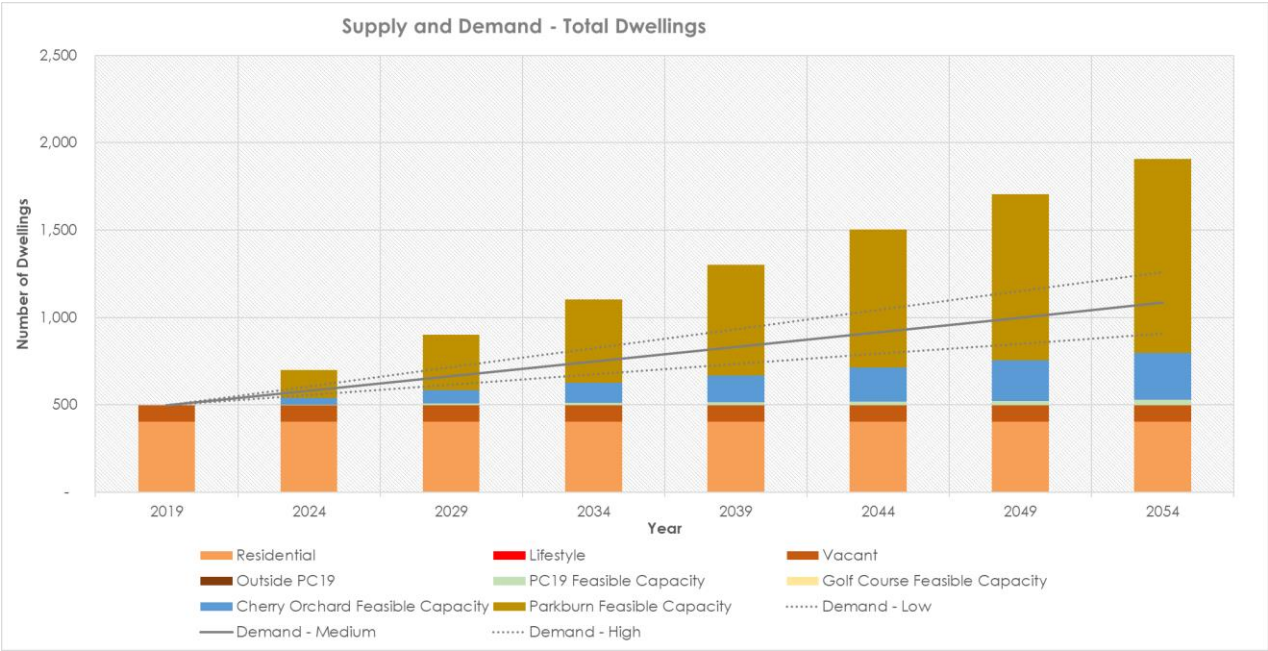


Figure 8: Pisa Moorings Demand vs Supply

5.5 Other (Rural)

As discussed in Section 2, PC19 does not provide zoning for the majority of rural lots, and as such a supply vs demand analysis is not meaningful for this area. Furthermore, most of the growth forecasted in rural areas has been shifted to the Cromwell township.

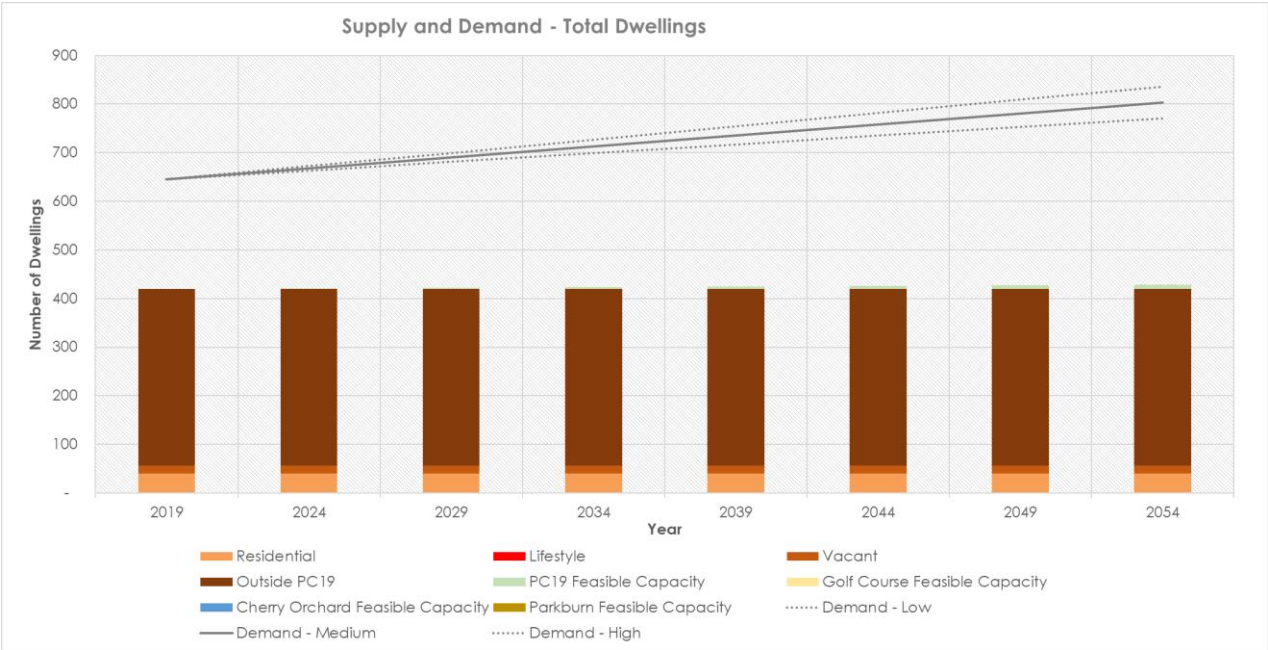
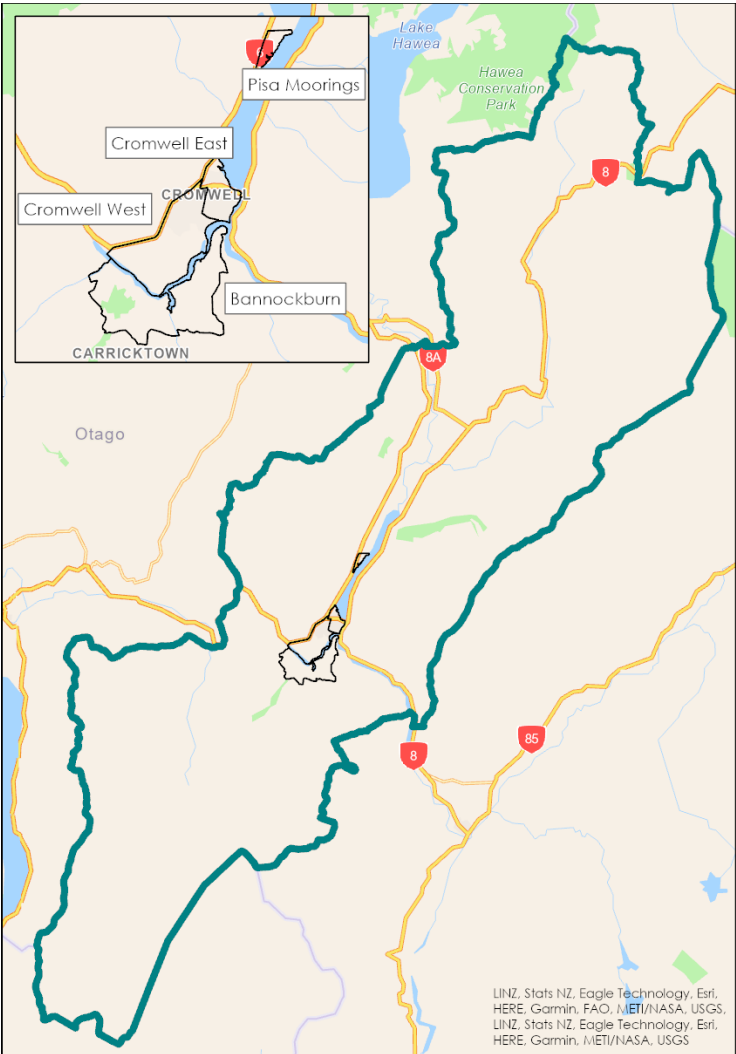


Figure 9: Rural Demand vs Supply

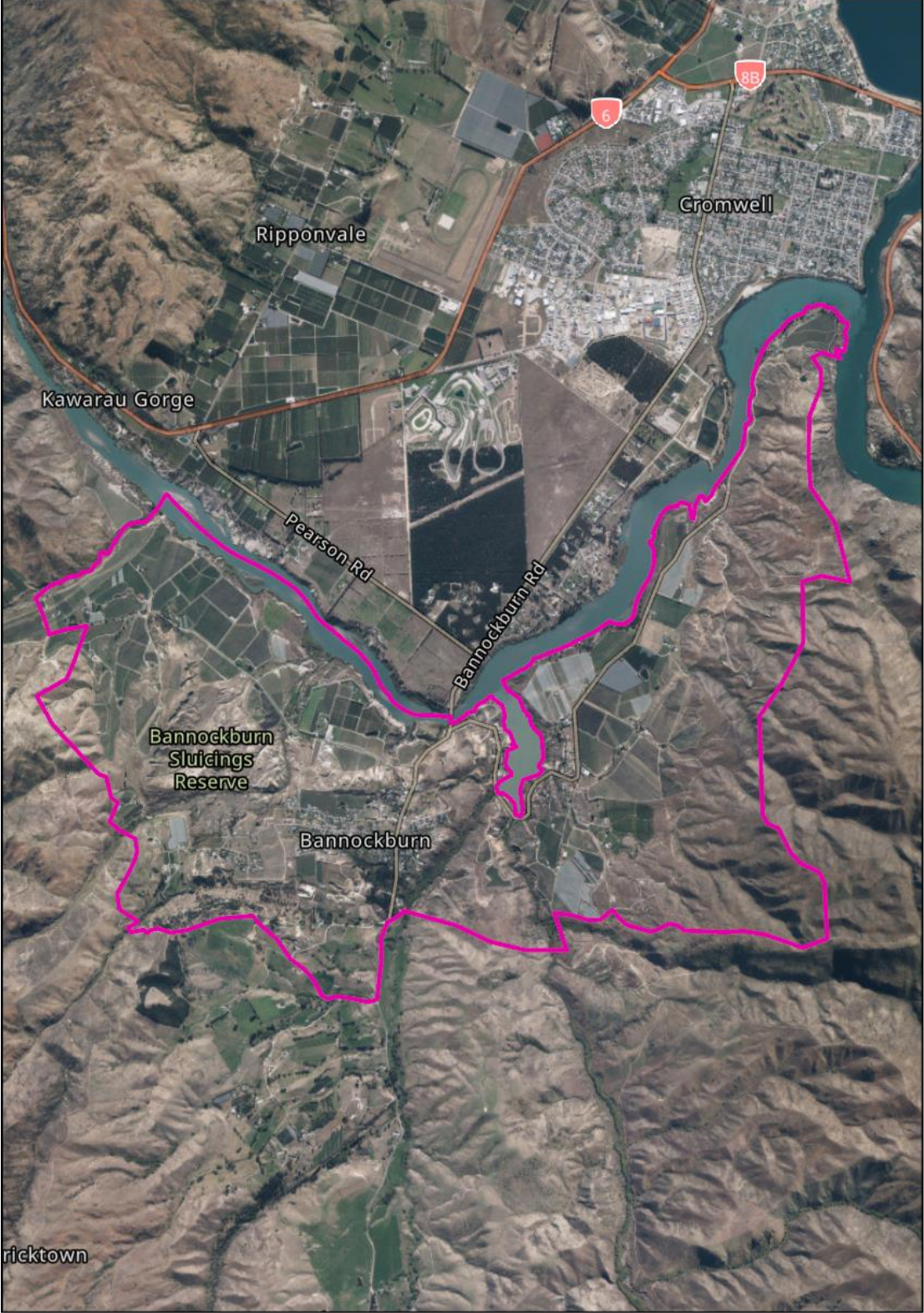
Appendices

Appendix A: Township Boundaries

Cromwell Ward



Bannockburn



Cromwell Township



Pisa Moorings



Appendix B: Additional Plan Change Zones

Golf Course - Cromwell



Cherry Orchard – Pisa Moorings



Parkburn – Pisa Moorings



Appendix C: Total Plan Area Breakdown

Table 6: Total Plan Area (m²) by Township and Lot Classification

Township and Lot Classification	Brownfields - Small Lots	Brownfields - Large Lots	Greenfields	Grand Total
Bannockburn	453,238	322,805	657,635	1,433,678
Large Lot	395,919	236,114	657,635	1,289,669
Large Lot (P2)		53,810		53,810
Large Lot (P3)	57,319	32,881		90,200
Cromwell	1,317,574	1,670,023	3,583,396	6,570,993
Medium Density	24,805	538,872	767,453	1,331,130
Low Density	1,058,550	570,816	2,542,317	4,171,683
Large Lot	7,264	404,069	273,625	684,958
Large Lot (P3)	226,956	156,266		383,222
Pisa Moorings	498,120	69,435	1,880,626	2,448,181
Low Density	55,713	10,622	1,242,246	1,308,582
Large Lot (P1)	442,407	58,812	638,380	1,139,599
Rural	276,404	81,775	153,304	511,483
Large Lot			20,199	20,199
Large Lot (P2)	276,404	81,775	133,105	491,284
Grand Total	2,545,336	2,144,038	6,274,961	10,964,335

Addendum – Sensitivity Analysis

Document Title:

Cromwell Yield Assessment. Addendum – Sensitivity Analysis

Date:

18/04/2023

Prepared for:

Central Otago District Council

Quality Assurance Statement

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Introduction

Further to the initial yield assessment, CODC engaged Rationale to do sensitivity analysis on the original model. The questions presented were:

- what is the yield from PC19 excluding plan change areas (Cherry Orchard and Parkburn),
- how would this yield change if the minimum lot size for the Low Density zone was reduced from 500sqm to 400sqm.

The same methodology and assumptions were used as per the original model. Note that the Golf Course which was considered an additional plan change area in the original report is now considered to be part of the PC19. As per the original model, 90% of growth in rural areas has been shifted to occur within Cromwell (see Section 3 for discussion on this).

Results

YIELDS

Table 7 presents the results, with the yellow section showing the yield from PC19, and the blue section showing the yield from plan change areas. The Grand Total at the bottom reflects the sum of the two.

Township and Zone	Existing Capacity	Total Feasible Capacity (@ 500sqm)	Total Feasible Capacity (@ 400sqm)	Additional Capacity @400sqm vs @500sqm
Bannockburn	267	507	507	0
Large Lot	240	480	480	0
Large Lot (P2)	0	0	0	0
Large Lot (P3)	0	0	0	0
Outside	27	27	27	0
Cromwell	3,056	9,261	10,313	1,052
Large Lot	73	250	250	0
Large Lot (P3)	40	40	40	0
Low Density	2,042	5,470	6,522	1,052
Medium Density	799	3,399	3,399	0
Outside	102	102	102	0
Pisa Moorings	498	528	563	35
Large Lot (P1)	416	423	423	0
Low Density	82	105	140	35
Outside	0	0	0	0
Rural	420	428	428	0
Large Lot	0	6	6	0
Large Lot (P2)	56	58	58	0
Outside	364	364	364	0
PC19 Subtotal	4,241	10,724	11,811	1,087
Cherry Orchard	0	271	338	67
Low Density	0	271	338	67
Parkburn	0	1,108	1,385	277
Low Density	0	1,108	1,385	277
Plan Change Areas Subtotal	0	1,379	1,723	344
Grand Total	4,241	12,103	13,534	1,431

Table 7: Yield assessment sensitivity

The results indicate that by changing the min. lot size rule the total feasible capacity of PC19 would increase by 1,087, from 10,724 to 11,811. Most of the additional capacity is generated in urban Cromwell where there is many Low Density lots.

The min. lot size rule change would also have material impact on the feasible capacity from the plan change areas, increasing the yield by 344 from 1,379 to 1,723.

SUFFICIENCY

Figure 10 compares feasible capacity against the demand forecast. Demand is shown as an orange line, with the confidence band around it representing the low and high scenarios of demand.

The @500sqm model (model that assumes a 500sqm min. lot size for Low Density zone) is shown with black lines, with the solid line showing the yield from PC19 only and the dashed line showing the yield from PC19 plus the plan change areas. Meanwhile, the @400sqm model (model that assumes a 400sqm min. lot size for Low Density Zone) is shown with green lines in a similar manner.

The results suggest that sufficiency under PC19 alone @500sqm would be tight in a scenario of high demand growth. Changing the rule to 400sqm would provide a more substantial buffer to allow for the potential of higher-than-anticipated growth.

Interestingly, the impact of changing the min. lot size rule generates a similar number of additional dwellings as that expected from the addition of the two plan change areas to PC19.

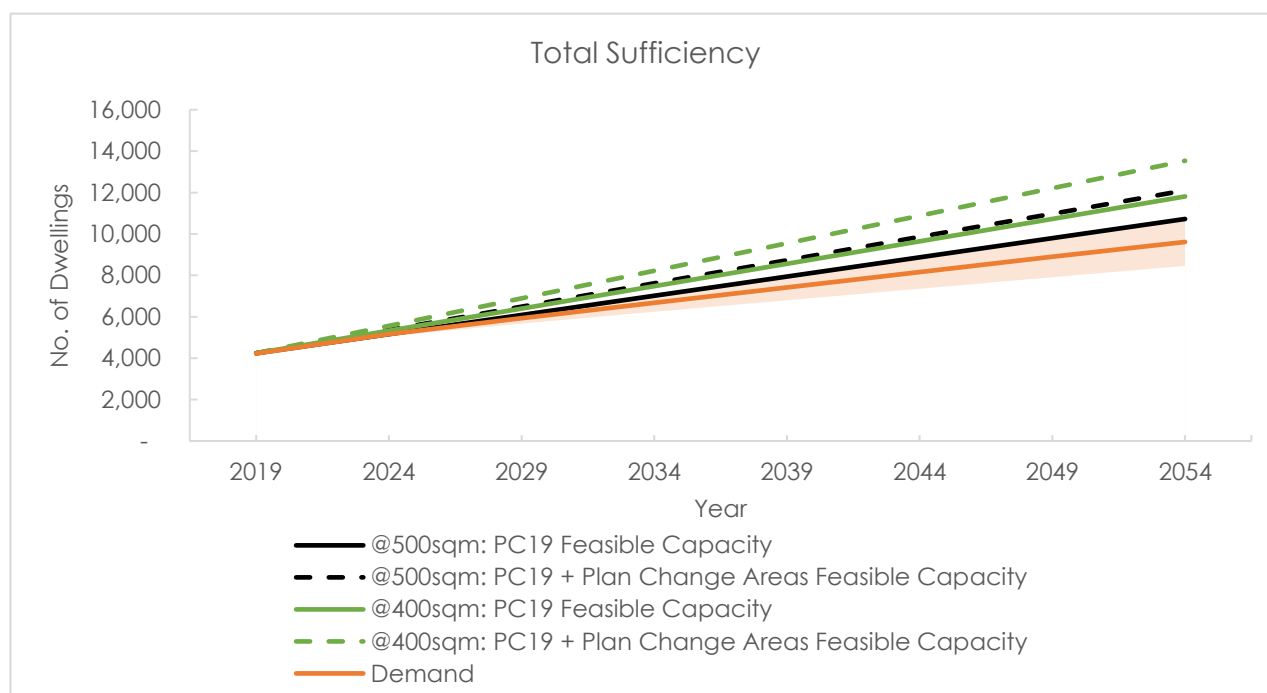


Figure 10: Total sufficiency under different sensitivity options

This same assessment is presented for each township in Figures 11, 12 and 13.

- Bannockburn's assessment remains unchanged as it does not hold Low Density lots or plan change areas.
- Cromwell's feasible capacity would increase by just over 1,000 dwellings with the min. lot size rule change. This would provide further capacity to accommodate spill-over from Bannockburn and neighbouring districts (Queenstown).
- Pisa Moorings' additional capacity is generated primarily by the plan change areas. Without these, there is little additional capacity and demand would not be met. The rule change generates an additional 380 dwellings in this area.

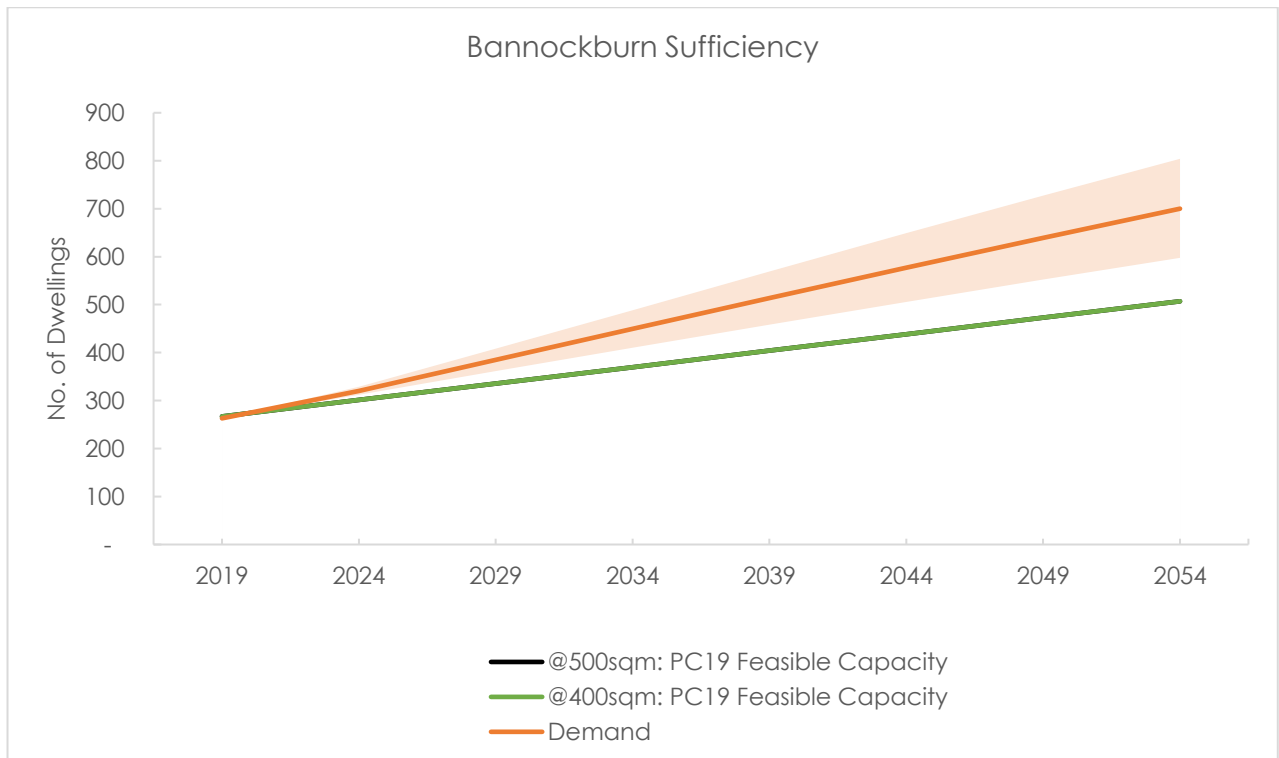


Figure 11: Bannockburn sufficiency under different sensitivity options

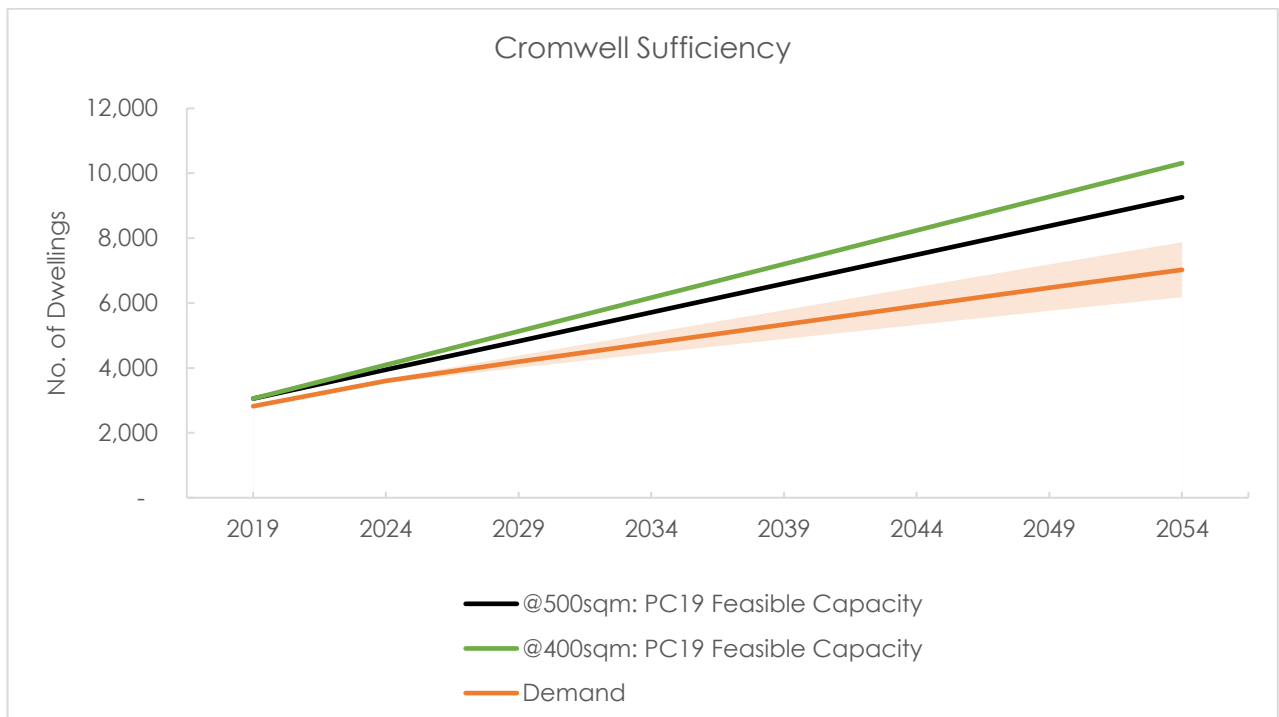


Figure 12: Cromwell sufficiency under different sensitivity options

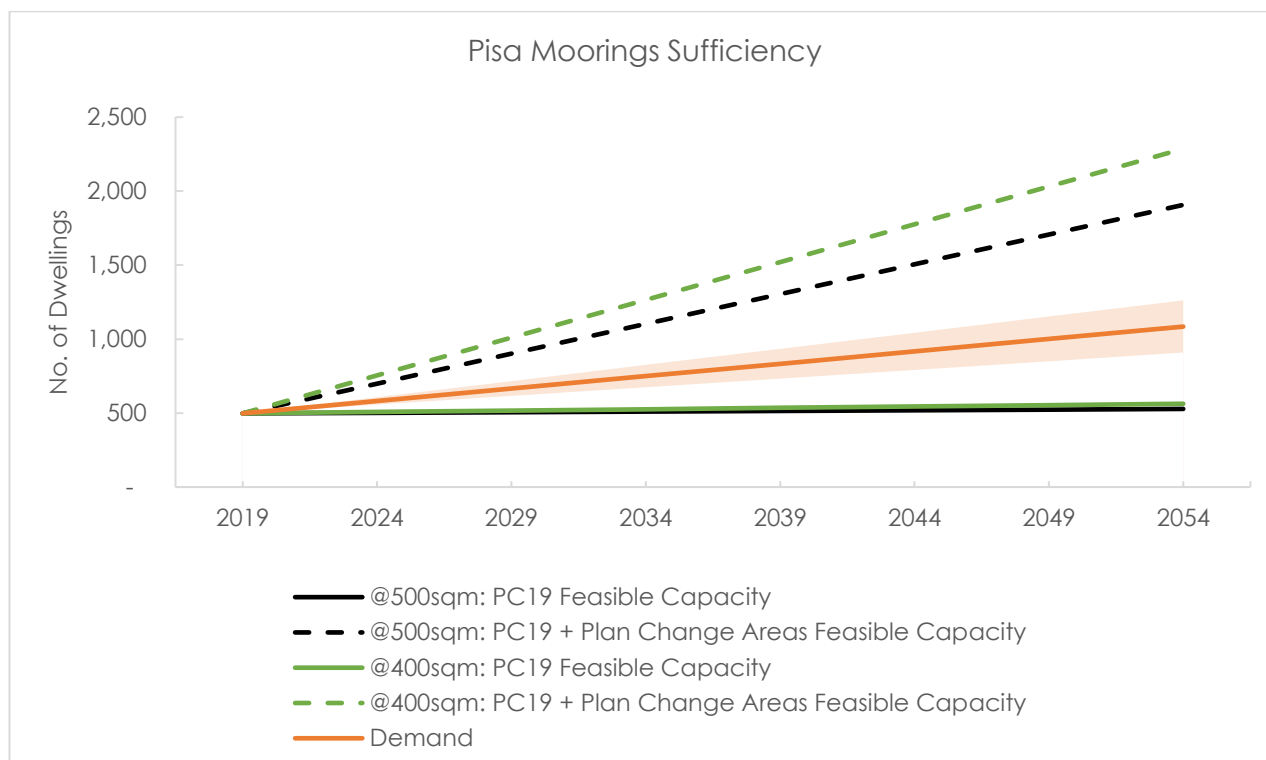


Figure 13: Pisa Moorings sufficiency under different sensitivity options

Conclusion

The sensitivity analysis suggests that changing the minimum lot size for the Low Density zone from 500sqm to 400sqm would have a material impact on the feasible capacity, allowing for an additional 1,087 dwellings from PC19 and 344 from plan change areas. Overall, this represents an additional 18% capacity.

Assessment of sufficiency requires considerations of growth scenarios. The original PC19 provides enough capacity for low-to-medium growth in the area. However, a high demand scenario would severely strain sufficiency under the original PC19, with a deficit of 50 dwellings expected by 2054. Either the inclusion of the plan change areas or the change to the minimum lot size would mitigate this risk and allow a buffer for high growth. The adoption of both these would allow for a total capacity of 13,534 dwellings, which is over 2,700 more dwellings than that demanded under the high growth scenario.