

**RESOURCE MANAGEMENT ACT 1991  
FORM 6**

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

**Clause 8 of Schedule 1, Resource Management Act 1991**

To: Central Otago District Council  
PO Box 122  
Alexandra 9340



**SUBMITTER: CENTRAL SPEEDWAY CLUB CROMWELL INCORPORATED (“ Central  
Speedway Club”)**

1. This is a further submission in support of a submission made on proposed Plan Change 13 to the Central Otago District Plan (“**PC13**”).
2. Central Speedway Club is a person who has an interest in the proposal that is greater than the interest the general public has. Central Speedway Club’s interest in the application was outlined in detail in their original submission (submitter no 45).
3. This submission is in support of 45 South Group of Companies (“45 South”), Submitter Number 123.
4. Central Speedway Club wishes to be heard in support of this submission and will consider presenting a joint case with other parties that make a similar submission.

**Summary**

5. PC13 is located within a rural area that has lawfully established horticultural and motorsport activities. PC13 fails to provide the necessary reverse sensitivity protection to these activities. There is an inherent conflict between these activities which suggest the inappropriateness of this application. PC13 has the potential to significantly impact the operation of local businesses that provide both direct and indirect benefits to the community through employment and economic opportunities.

**Specific Points**

6. Central Speedway Club support the entire submission (being submission points 123/1-35). We have provided a summary below:
  - (a) Agricultural activities, particularly orchards, are an important element of the Cromwell community. These activities provide both direct and indirect contributions through employment and economic activity.
  - (b) Central Speedway Club support the submission that reverse sensitivity effects concerning agricultural activity, particularly orchards, have not been addressed by

PC13. Orchards are sources of noise that include the operation of machinery, bird scaring, frost fighting and helicopters. Further contributory effects may include chemicals and burning for biosecurity reasons.

- (c) It is also important to note that these activities are not specific to 45 South, and other forms of agricultural activity exist in proximity to the application site. PC13 is inconsistent with these activities.
- (d) The increase in traffic volumes on State Highway 6 and other parts of the roading network (particularly Sandflat Road) have not been adequately assessed. Central Speedway Club support the submission that these reverse sensitivity effects cannot be adequately avoided, remedied or mitigated by the developer, or by future landowners.
- (e) PC13 results in an inappropriate loss of productive land.
- (f) PC13 Objective, Policy and Rule framework is deficient in terms of addressing reverse sensitivity effects.
- (g) PC13 fails to give effect to the National Policy Statement for Urban Development Capacity. The NPS-UDC requires decision makers to consider effects of urban development on the local, district, regional and greater scales. We support the submission that both the horticultural industry and motorsport activity have a significant economic benefit to the Cromwell area and beyond. This proposal has the potential to severely compromise the viability of these activities.
- (h) The application is inconsistent with other planning instruments, including:
  - (i) Purpose and Principles of the Resource Management Act 1991;
  - (ii) Objectives and Policies of the operative and proposed Regional Policy Statement;
  - (iii) Objectives and Policies of the Central Otago District Plan.

**Relief Sought**

7. The application is incompatible with the receiving environment. Central Speedway Club seek the following decision from Council:

- (a) PC13 is refused.



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**Date: 29 October 2018**

B Irving / D McLachlan

Solicitor for Submitter

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