

**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: Highlands Motorsport Park Limited (Highlands)

1. This is a further submission in opposition of a submission made on proposed Plan Change 13 to the Central Otago District Plan ("PC13").
2. Highlands is a person who has an interest in the proposal that is greater than the interest the general public has. Highlands interest in the application was outlined in detail in their original submission (submitter no 144).
3. Highlands oppose the submission of Anthony Streeter (submitter no 353).
4. Highlands wish 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 will give rise to reverse sensitivity effects. These reverse sensitivity effects cannot be adequately avoided, remedied or mitigated by the developer or by future landowners.

Specific Points

6. Highlands oppose the following submission points 353/1, 353/2, 353/3, 353/4 and 353/5. We provide a summary of our reasons below:
 - (a) Highlands oppose the submission that the site is the most appropriate location for the development. A comprehensive assessment of alternative locations has not been provided by the applicant.
 - (b) An assessment of the level of demand for housing in Cromwell has not been undertaken as part of PC13, particularly demand within a noise producing environment. Two significant subdivisions (Holiday Park and Wooing Tree) have just been approved within Cromwell which will provide supply in the short to medium term whilst the master planning work is being completed.

- (c) Highland's oppose the submission that PC13 is the most cost effective option in regard to the provision of infrastructure. A comparative assessment has not been provided within the application to support this submission.
- (d) The application fails to provide sufficient infrastructure and connectivity to the Cromwell Township.
- (e) PC13 gives rise to reverse sensitivity issues. The application fails to provide a mechanism which protects the consented level of activity, but also risks the imposition of further restrictions due to future complaints and may significantly constrain potential future developments at the Speedway and Highlands which are both physical resources.

Relief Sought

- 7. The application is incompatible with the receiving environment. Highlands seek the following decision from Council:
 - (a) PC13 is refused.



.....
Date: 29 October 2018

B Irving / D McLachlan
Solicitor for Submitter

Address: Gallaway Cook Allan, Lawyers
PO Box 143,
Dunedin 9054

Phone: 03 477 7312

Email: bridget.irving@gallawaycookallan.co.nz
derek.mclachlan@gallawaycookallan.co.nz