

RECEIVED

By Nicole Fleming at 11:56 am, Dec 01, 2021



1 Dunorling Street
PO Box 122, Alexandra 9340
New Zealand
03 440 0056



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Resource Management Act 1991

Submission on Notified Proposed Plan Change to

Central Otago District Plan

Clause 6 of Schedule 1, Resource Management Act 1991

(FORM 5)

To: The Chief Executive
Central Otago District Council
PO Box 122
Alexandra 9340

DETAILS OF SUBMITTER

Name of Submitter: Cerise Orchard Limited

Postal Address: Ross Dowling Marquet Griffin, PO Box 1144, Dunedin 9054 - Attention: A J Logan
(Or alternative method of service under [section 352](#) of the Act)

Telephone: 03 951 2363

Email: alastair.logan@rossdowling.co.nz

Contact Person: Alastair Logan

(Name & designation, if applicable)

This is a submission on proposed Plan Change 18 to the Central Otago District Plan (the proposal).

I am/am not* a trade competitor for the purposes of [section 308B](#) of the Resource Management Act 1991 (*select one)

~~*I/We am/am not (select one) directly affected by an effect of the subject matter of the submission that:~~

~~(a) adversely affects the environment; and~~

~~(b) does not relate to trade competition or the effects of trade competition.~~

~~*Delete this paragraph if you are not a trade competitor.~~

The specific provisions of the proposal that my submission relates to are:

(Give details, attach on separate page if necessary)

The whole of Plan Change 18.



OFFICIAL REGIONAL IDENTITY PARTNER

www.centralotagonz.com

This submission is:

(Attach on separate page if necessary) Include:

- whether you support or oppose the specific parts of the application or wish to have them amended; and
- the reasons for your views.

See attached.

I/We seek the following decision from the consent authority:

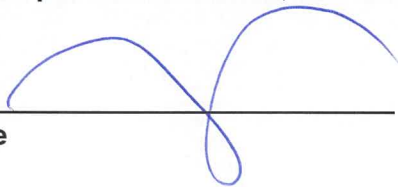
(Give precise details, including the general nature of any conditions sought)

Plan Change 18 be approved.

- I support ~~I oppose~~ the application ~~OR neither support nor oppose~~ (select one)
- I wish ~~I do not wish~~ to be heard in support of this submission (select one)
- *I/We will consider presenting a joint case if others make a similar submission
*Delete this paragraph if not applicable.

In lodging this submission, I understand that my submission, including contact details, are considered public information, and will be made available and published as part of this process.

Signature



1 December 2021

Date

**Submissions close in response to proposed Plan Change 18 at 4pm on
Thursday 9 December 2021**

Submissions can be emailed to districtplan@codc.govt.nz

Note to person making submission

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.

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- it discloses no reasonable or relevant case:
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further:
- it contains offensive language:
- it is supported only by material that purports to be independent expert evidence but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

1. Cerise Orchard Limited supports Plan Change 18 in its entirety.
2. The rezoning accords with and gives effect to the Cromwell Masterplan.
3. Cromwell is now the hub of the Upper Clutha Basin, operating, as a key service centre.
4. Land zoned for industrial purposes is essential to service both the town and its rural hinterland, which now encompasses Alexandra, Wanaka, and Queenstown.
5. Industrial businesses are necessary to support horticulture, viticulture and other rural activities throughout the Upper Clutha Basin and as far afield as Alexandra and Queenstown.
6. The rezoning of the land for industrial use is necessary to meet the current and future demand for industrial land in Cromwell.
7. The land to be rezoned by PC18 logically extends and consolidates existing industrial zoning.
8. The land to be rezoned is located away from incompatible activities and avoids reverse sensitivity issues.
9. The activities on adjoining land are complementary to and not in conflict with the proposed rezoning.
10. The land to be rezoned is generally serviced by appropriate infrastructure.
11. The loss of a small area of land now used for horticulture is not material. The trees are at end of life stage. There is abundant land in the area suitable for horticultural and viticultural use and for other productive purposes.
12. Rezoning this horticultural block will enable the removal of the reverse sensitivity issues arising from spraying next to adjoining industrial activities and close to the Cromwell cemetery.
13. PC18 discharges the Council's obligations under section 31(1)(aa) RMA.
14. PC18 gives effect to the National Policy Statement on Urban Development.
15. PC18 gives effect to the relevant provisions in the partially Operative Regional Policy Statement 2019.
16. PC18 has regard to the relevant provisions of the proposed Regional Policy Statement 2021.
17. The rezoning promotes sustainable management and thereby achieves the purpose of the Resource Management Act 1991.

RECEIVED

By Nicole Fleming at 1:03 pm, Dec 02, 2021



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Resource Management Act 1991

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Central Otago District Plan

Clause 6 of Schedule 1, Resource Management Act 1991

(FORM 5)

To: The Chief Executive
Central Otago District Council
PO Box 122
Alexandra 9340

DETAILS OF SUBMITTER

Name of Submitter: Werner Murray

Postal Address: 23A Miners Terrace Bannockburn
(Or alternative method of service under [section 352](#) of the Act)

Telephone: 0274456845

Email: carolynwerner@mac.com

Contact Person: Werner Murray
(Name & designation, if applicable)

This is a submission on proposed Plan Change 18 to the Central Otago District Plan (the proposal).

I am **am not** a trade competitor for the purposes of [section 308B](#) of the Resource Management Act 1991 (*select one)

***I/We am/am not (select one) directly affected by an effect of the subject matter of the submission that:**

- (a) adversely affects the environment; and**
- (b) does not relate to trade competition or the effects of trade competition.**

**Delete this paragraph if you are not a trade competitor.*

The specific provisions of the proposal that my submission relates to are:

(Give details, attach on separate page if necessary)

Cromwell Master Plan and Spatial Plan, and the spatial extent of the plan change

The provisions make no reference to the Correspondence/Heirarchy with the town centre - see issues highlighted by Cromwell Masterplan page 25
An increase in industrial land with no controls can adversely affect the vitality and viability of the town centre.

This submission is:

(Attach on separate page if necessary) Include:

- whether you support or oppose the specific parts of the application or wish to have them amended; and
- the reasons for your views.

Development feasibility and development readiness of developable land needs to be taken into account, and transport and traffic

Extent of the zoning needs to be looked at I support amending the area that is included in the plan change, the entrance to Cromwell needs to be looked at

I/We seek the following decision from the consent authority:

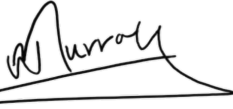
(Give precise details, including the general nature of any conditions sought)

National Planning Standards the need to have 2-3 industrial zones (Light Industry, General Industry, and Heavy

With the size of this land a structure plan needs to be put in place

-
- I support oppose the application OR neither support nor oppose (select one)
 - I wish / do not wish to be heard in support of this submission (select one)
 - I/We will consider presenting a joint case if others make a similar submission
- *Delete this paragraph if not applicable.*

In lodging this submission, I understand that my submission, including contact details, are considered public information, and will be made available and published as part of this process.



Signature

02/12/2021

Date

**Submissions close in response to proposed Plan Change 18 at 4pm on
Thursday 9 December 2021**

Submissions can be emailed to districtplan@codc.govt.nz

Note to person making submission

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RECEIVED

By Nicole Fleming at 3:18 pm, Dec 02, 2021



**CROMWELL
BUSINESS PARK**

SH6 AT CROMWELL LTD

1 December 2021

The Chief Executive
Central Otago District Council
PO Box 122
Alexandra 9340

Dear Sanchia,

LETTER OF SUPPORT TO PLAN CHANGE 18

We, the Directors of SH6 at Cromwell Limited, who via private plan change PC 11 in 2018, have developed the 16 lots on the corner of McNulty Road and Kawarau Gorge Road (SH6).

Six lots have been fully developed and only 3 remain unsold, at this time.

We support this plan change due to the eventual need for more industrial land in the area and to maintain the fact that Cromwell is the Hub of Central Otago.

Yours Sincerely,
SH6 at Cromwell Limited

Pat Cummings
Managing director

Mobile: 021 911 956
Email: patonland@xtra.co.nz



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PO Box 122, Alexandra 9340
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Resource Management Act 1991

Submission on Notified Proposed Plan Change to

Central Otago District Plan

Clause 6 of Schedule 1, Resource Management Act 1991

(FORM 5)

To: The Chief Executive
Central Otago District Council
PO Box 122
Alexandra 9340

DETAILS OF SUBMITTER

Name of Submitter: SH6 At Cromwell Limited

Postal Address: PO Box 649, Dunedin 9054
(Or alternative method of service under section 352 of the Act)

Telephone: 021911956

Email: patonland@xtra.co.nz

Contact Person: Mr Pat Cummings
(Name & designation, if applicable)

This is a submission on proposed Plan Change 18 to the Central Otago District Plan (the proposal).

I ~~am~~ am not* a trade competitor for the purposes of section 308B of the Resource Management Act 1991 (*select one)

~~I/We am/am not (select one) directly affected by an effect of the subject matter of the submission that:~~

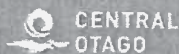
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(Give details, attach on separate page if necessary)

The whole of Plan Change 18.



OFFICIAL BUSINESS

www.centralotagonz.com



This submission is:

(Attach on separate page if necessary) Include:

- *whether you support or oppose the specific parts of the application or wish to have them amended; and*
- *the reasons for your views.*

See attached.

I/We seek the following decision from the consent authority:

(Give precise details, including the general nature of any conditions sought)

Plan Change 18 be approved.

- ~~I support / oppose the application OR neither support nor oppose (select one)~~
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- ~~I/We will consider presenting a joint case if others make a similar submission~~
*Delete this paragraph if not applicable.

In lodging this submission, I understand that my submission, including contact details, are considered public information, and will be made available and published as part of this process.

SH6 At Cornwell Limited

 Director

1 December 2021
Date

Submissions close in response to proposed Plan Change 18 at 4pm on Thursday 9 December 2021

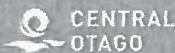
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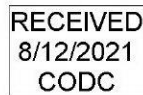
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OTAGO REGIONAL IDENTITY PARTNER

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**SUBMISSION ON NOTIFIED PROPOSED PLAN CHANGE TO CENTRAL OTAGO DISTRICT PLAN
BY HIGHLANDS MOTORSPORT PARK
PURSUANT TO CLAUSE 6 OF THE FIRST SCHEDULE,
RESOURCE MANAGEMENT ACT 1991**

To: Central Otago District Council
PO Box 122
Alexandra 9340
districtplan@codc.govt.nz

Submission by: **Highlands Motorsport Park Limited (Highlands)**
c/- Gallaway Cook Allan, Lawyers
P.O. Box 143
Dunedin 9054
Attention: Bridget Irving

03 477 7312 / 027 3616326

bridget.irving@gallawaycookallan.co.nz

On: **Notified Proposed Plan Change 18 to Central Otago District Plan**
Date 7 December 2021

- 1. Highlands is not a trade competitor for the purposes of section 308B of the Resource Management Act 1991.**
- 2. This Submission relates to the whole of Plan Change 18.**
- 3. Highlands seeks that the Plan Change be approved.**
- 4. Highlands wish to be heard in support of this submission and will consider presenting a joint case if others make a similar submission.**

BACKGROUND

1. Highlands Motorsport Park Limited operates an extensive commercial, events and tourism facility, known as the Highlands Motorsport Park, bounded by Cemetery Road, Sandflat Road and the Chaffer Beatle Reserve.
2. The Motorsport Park commenced operations in 2013 and now includes:
 - a. National Motorsport Museum and café;

- b. Go Karts;
 - c. Dirt Buggy Adventures;
 - d. Gasoline Alley;
 - e. A Sculpture Park;
 - f. Mini Golf;
 - g. Wine Cave;
 - h. Loo with a View
 - i. At least 7 track-based activities including Highlands Taxi, Fast laps and u-drive experiences.
3. The Park is also utilised for driver training and corporate events, vehicle manufacturer testing and the like.
 4. Highland's operation is currently authorized by an extensive resource consent. The consent authorises the development that has taken place on the site and the full range of activities that occur within it. The consent authorises up to 16 event days per year and we also run members track days alongside our day-to-day track activities. Whilst we must comply with strict resource consent conditions that manage the effects of our activities, we do generate noise (and quite a lot of it during events) that affects the surrounding area from time to time.
 5. Highlands was identified as a tourism business of Regional Significance in 2020 receiving government support through the Covid-19 pandemic. We currently employ 28 full time staff, with up to 15 other staff coming on board over the busy summer season.
 6. Alongside the Motorsport Park we have developed the Highlands Innovation and Technology Park. This is a subdivision that is tailored towards motor racing enthusiasts and businesses that are associated with motorsport. Owners must also be a member of the Highlands Motorsport Park Club.
 7. A number of businesses have established within the Park including vehicle grooming, car storage, workshops and the like. Fairly recently Haydon Paddon established his race team base (Paddon Rallysport) at the Innovation Park and they utilize the Motorsport Park for vehicle testing.
 8. Given the nature of the activities that take place at Highlands, it is very conscious of the development that takes place around it. Particularly that which might be sensitive to Motorsport noise.

Highlands view on the proposed zoning

Compatibility with Highlands

9. Highlands consider the proposed rezoning of rural land to industrial proposed within Plan Change 18 to be entirely appropriate.
10. There is a need to zone additional land for industrial purposes to meet current and future demand within Cromwell. The proposed areas in proximity to Highlands are suitable for this purpose and compatible with the activities taking place within the Motorsport Park. Industrial Zoning is more appropriate than other zones which may facilitate the establishment of sensitive activities such as residential activity, education facilities, aged care and the like. Highlands has previously opposed rezoning of land nearby for residential/commercial purposes due to noise effects and reverse sensitivity concerns.
11. Highlands' operations and industrial activities are much more likely to be compatible and as such land in proximity to Highlands is well suited to this zone due to the limited risk of reverse sensitivity effects arising.

Highlands demand for local suppliers

12. The nature of Highlands' business is such that it relies on local service industries to support its operations – such as track maintenance, construction etc. Existence of these industries is critical to Highlands ongoing success. Highlands believe that it is important that there is adequate land available within Cromwell for these businesses to establish, operate and expand without unnecessary planning impediments. To facilitate this in such close proximity to Highlands is likely to have advantages.

Effects on the road network

13. Highlands is also supportive of the need to undertake roading upgrades to address traffic generation arising from the rezoning. Whilst traffic around the site is currently acceptable, increased traffic volumes (particularly heavy traffic) do need to be managed to ensure that the roading network (particularly the Cemetery Road/SH intersection) continue to operate safely and efficiently. Highlands consider that this is a matter than can be addressed as the extension area is developed and does not count against the proposed rezoning.

Conclusion

14. Highlands is comfortable with the proposed rezoning and sees it as complementing its own activities.

A handwritten signature in cursive script, appearing to read "Bridget Luig".

Solicitor for Highlands Motorsport Park Limited

Dated: 7 December 2021



1 Dunorling Street
PO Box 122, Alexandra 9340
New Zealand
03 440 0056



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www.codc.govt.nz

Resource Management Act 1991

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Central Otago District Plan

Clause 6 of Schedule 1, Resource Management Act 1991

(FORM 5)

To: The Chief Executive
Central Otago District Council
PO Box 122
Alexandra 9340

DETAILS OF SUBMITTER

Name of Submitter: Aurora Energy Limited

Postal Address: 10 Halsey Street, Dunedin 9016
(Or alternative method of service under [section 352](#) of the Act)

Telephone: 0800 22 00 05

Email: Angus.Robertson@auroraenergy.nz

Contact Person: Angus Robertson, Property & Environmental Planner
(Name & designation, if applicable)

This is a submission on proposed Plan Change 18 to the Central Otago District Plan (the proposal).

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(Give details, attach on separate page if necessary)

Please see attached

This submission is:

(Attach on separate page if necessary) Include:

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(Give precise details, including the general nature of any conditions sought)

Please see attached

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Signature

08/12/2021

Date

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SUBMISSION ON CENTRAL OTAGO DISTRICT COUNCIL NOTIFIED PLAN CHANGE 18

To: Central Otago District Council
PO Box 122
Alexandra, 9340

From: Aurora Energy Limited
10 Halsey Street
PO Box 1404
DUNEDIN 9054

This is a submission on public notice Plan Change 18, Cromwell, which seeks to include approximately 65.5ha of land as an extension to the Cromwell Industrial Resource Area.

Background

Aurora Energy Limited (Aurora Energy) owns, operates and maintains an electricity distribution network in the Dunedin, Central Otago and Queenstown Lakes districts. This network carries electricity from the National Grid to more than 87,000 homes and businesses across Dunedin City and the Central Otago region. Aurora Energy owns substations, lines and cables located in public road reserve, as well as on private property. In addition to the distribution network, Aurora has the capacity to own and operate high voltage (up to 110kV) transmission lines, and associated structures in future, and may be required to do so as regional electricity demand grows. Aurora is committed to providing its customers in the region with an effective and secure supply of electricity which, in doing so, provides a critical service to customers, as well as a public good to local communities including hospitals, schools, offices and residential dwellings.

Aurora Energy owns three separate lines and supporting infrastructure running through the area of land proposed for rezoning, legally described as Lot 5 DP 454268, Lot 3-4 DP 526140 and Section 2 SO Plan 526035. The infrastructure includes 66Kv and 33Kv extra high voltage conductors, an 11Kv high voltage conductor and a 230V low voltage underground cable as well as supporting infrastructure including 38 poles, switching gear and junctions. The lines and associated infrastructure cross Bannockburn Road to the south of the site and Cemetery Road to the north, as shown in **Figure 1** below.

These lines are strategic assets for Aurora Energy serving a number of commercial, residential and industrial customers in Cromwell and the wider Central Otago/Queenstown Lakes region. One of these lines goes on to follow SH6 to the east to supply Wanaka and surrounds, while

another, the "Meg Line", connects to the generation facility at the Roaring Meg. These lines have been in operation since 1979, 1984 and 1994 and are continually upgraded and maintained as load grows within the Central Otago region. Aurora Energy has planned expansion works for the "Meg Line" in particular over the next planning period, as outlined within the Aurora Energy Asset Management Plan 2017-2027, to provide additional support to the region and security from extended outages.

Aurora Energy also have infrastructure bordering the other, smaller, sites included in Plan Change 18 adjacent to State Highway 6, legally described as Lot 1 & 2 DP 390710. Although this is not as likely to be directly impacted by the rezoning, being in the adjacent road reserve rather than contained within the site. This infrastructure is shown in **Figure 2** below.

Given the significance of this infrastructure it is important any works that are to be undertaken on the site are carried out in a manner that do not undermine it or compromise compliance with New Zealand Electrical Code of Practice – 34 – Safety Clearances (NZECP34). From the information available in the plan change application, is it not clear what, if any, changes will be required to Aurora Energy's infrastructure.

NZECP 34 is governed by the Electricity (Safety) Regulations 2010 and the Electricity Act 1992. Part 2 of the Regulations prescribes general safety requirements that must be maintained by private landowners and electricity infrastructure owners. Clause 17 of the Regulations provides for the following:

- *A person who carries out any construction, building, excavation, or other work on or near an electric line must maintain safe distances – in accordance with ECP 34.*

It is an offence to carry out any work without maintaining the safe distances set out within NZECP34. The person who carries out the work and/or is in control of the work may be prosecuted. A failure to comply with the setback standards within NZECP34 can also create a significant health and safety risk for staff and/or contractors working within the setback distances. This may give rise to further liability under Health and Safety legislation. Work that cannot be completed in accordance with the requirements of NZECP34 is prohibited.

Aurora Energy is concerned that any resultant development and operation of the site(s) from Plan Change 18 does not result in issues associated with reverse sensitivity, compromise the functionality of its regionally significant network infrastructure, or result in adverse safety outcomes.

Trade Competition

Aurora Energy could not gain an advantage in trade competition through this submission.

The Specific Parts of the Application the Submission Relates to:

Aurora Energy's submission is in relation to the entire subject matter of the application.

Submission

Aurora Energy's submission is as follows: —

Aurora Energy's submission is neutral regarding the rezoning of the proposed site(s). However, given the close proximity of Aurora Energy's infrastructure on, and adjacent to, the proposed sites, Aurora Energy highlights the following concerns:

- Aurora Energy seeks to ensure the protection of its assets from adverse effects, including reverse sensitivity effects associated with land use activities and appropriate management of potential adverse effects of Aurora Energy's network, taking into consideration the specific locational, technical and operational requirements of its network. These obligations are largely found within the New Zealand Electrical Code of Practice for Electrical Safe Distances ("NZECP 34:2001"), although other regulatory documents also control works undertaken in the proximity of Aurora Energy's network.
- The proposed development is located in close proximity to a number of regionally significant Aurora Energy assets (in particular the high voltage lines identified above).

Specific obligations include:

- The application must comply with NZECP 34:2001 Electrical Safe Distances when building near overhead lines. If the proposal requires work closer than four metres to overhead lines, the applicant must obtain a close approach approval from Aurora Energy.
- All excavation within five metres of a power pole requires close approach approval. Digging includes anything that disturbs or penetrates the ground including shovels, excavators, hammer drills, directional drillers and hydro excavators.
- No mechanical excavation shall occur within two metres of strategic cables.
- Depending on the nature of the works it may be necessary to disconnect the power. Given the significance of the line careful consideration will need to be given to management of any outages.
- No landscaping is to be planted under any of the overhead lines, or on top of the underground cables.
- Correspondence with an Aurora Energy engineer is required prior to any excavations occurring to ensure that underground cables and supporting infrastructure are not damaged, and to ensure that the foundations of any poles are not undermined.
- It is noted that only public roads have been addressed in the application. There is no mention of the electricity assets of Aurora Energy on the subject site(s) or the need for connections to the Aurora Energy network. If the plan change is approved, the existing Aurora Energy lines will likely provide the source of electricity supply to future

developments. Easements for such services may be required if the site is subdivided and subsequently developed.

- Aurora Energy therefore seeks assurances from the applicant that the operation and maintenance of its assets will not be adversely affected by the proposed plan change.



Figure 1 - Aurora Energy Lines and support infrastructure crossing the proposed IRA extension



Figure 2 - Aurora Energy Lines and support infrastructure adjacent to the proposed IRA extension

Aurora Energy seeks the following decision from the consent authority:

If the Central Otago District Council approves Plan Change 18, then Aurora Energy seeks performance standards or advice notes attached to any further approvals that will address the issues outlined above.

Hearing

Aurora Energy reserves its right to be heard in relation to the application. If appropriate conditions, performance standards or other mechanisms are included and accepted by the Council, Aurora Energy is unlikely to need to be heard.

If others make a similar submission, Aurora Energy will consider presenting a joint case with them at the hearing.

Date: 8 December 2021

(A signature is not required if you make your submission by electronic means.)

Address for service of submitter:

Aurora Energy Limited,
10 Halsey Street Dunedin

Telephone:

0800 22 00 05

Email:

angus.robertson@auroraenergy.nz

Contact person:

Angus Robertson
Property and Environmental Planning
Analyst

RECEIVED
8/12/2021
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Submission by Transpower New Zealand Ltd on Plan Change 18 Cromwell Industrial Extension to the Central Otago District Plan

8 December 2021

Keeping the energy flowing



**SUBMISSION BY TRANSPOWER NEW ZEALAND LIMITED
ON PROPOSED PLAN CHANGE 18 CROMWELL INDUSTRIAL EXTENSION TO THE
CENTRAL OTAGO DISTRICT PLAN**

To: Plan Change 18 Submissions
The Chief Executive
Central Otago District Council
PO Box 122
ALEXANDRA 9340
By email: resource.consents@codc.govt.nz

Name of Submitter making submission:

Transpower New Zealand Ltd

Address for Service and Correspondence

Transpower New Zealand Limited
Attn: Trudi Burney
31 Gilberthorpes Road
Islington
Christchurch 8042 1546
Email: environment.policy@transpower.co.nz
Ph: 03 590 7126

This is a submission to Proposed Plan Change 18 – Cromwell Industrial Extension to the Central Otago District Plan

Transpower could not gain advantage in trade competition through this submission

The specific provisions of the proposed plan change that the submission relates to are:

Refer attached which outlines the specific feedback.

Transpower NZ Ltd wishes to be heard in support of its submission.



Signature of submitter
[or person authorised to sign on behalf of the submitter.]

Date: 8 December 2021

SUBMISSION BY TRANSPOWER NEW ZEALAND LIMITED ON PROPOSED PLAN CHANGE 18 CROMWELL INDUSTRIAL EXTENSION TO THE OPERATIVE CENTRAL OTAGO DISTRICT PLAN

Overview

This is a submission made by Transpower New Zealand Limited (“**Transpower**”) on Proposed Plan Change 18 Cromwell Industrial Extension (“**PC18**”) to the operative Central Otago District Plan 2008 (“**District Plan**”).

This submission seeks to ensure PC18 appropriately recognises and provides for the National Grid. Specifically, from Transpower’s perspective, the provisions of PC18 need to ensure that the District Plan:

- Gives effect to the National Policy Statement on Electricity Transmission 2008 (“**NPSET**” or “**NPS**”);
- Recognises the need to sustainably manage the National Grid as a physical resource of national significance;
- Recognises the benefits of the National Grid at local, regional and national levels; and
- Provides for the effective operation, maintenance, upgrading and development of the National Grid.

Introduction to Transpower

Transpower is a State-Owned Enterprise that plans, builds, maintains and operates New Zealand’s National Grid, the high voltage electricity transmission network for the country. The National Grid links generators directly to distribution companies and major industrial users, feeding electricity to the local networks that distribute electricity to homes and businesses. The National Grid comprises towers, poles, lines, cables, substations, a telecommunications network and other ancillary equipment stretching and connecting the length and breadth of the country from Kaikohe in the North Island down to Tiwai in the South Island, with two national control centres (in Hamilton and Wellington).

The National Grid includes approximately 11,000km circuit of transmission lines and around 170 substations, supported by a telecommunications network of some 300 telecommunication sites, which help link together the components that make up the National Grid.

Transpower’s role and function is determined by the State-Owned Enterprises Act 1986, the company’s Statement of Corporate Intent, and the regulatory framework within which it operates. Transpower does not generate electricity, nor does it have any retail functions. Transpower’s Statement of Corporate Intent for 1 July 2021, states that:

Transpower is central to the New Zealand electricity industry, connecting New Zealanders to their power system through safe, smart solutions for today and tomorrow. Our principal commercial activities are:

- *As grid owner, to reliably and efficiently transport electricity from generators to distributors and large users, and*
- *As system operator, to operate a competitive electricity market and deliver a secure power system.*

In line with these objectives, Transpower needs to efficiently maintain and develop the network to meet increasing demand, to connect new generation, and ensure security of supply, thereby contributing to New Zealand's economic and social aspirations. It has to be emphasised that the National Grid is an ever-developing system, responding to changing supply and demand patterns, growth, reliability and security needs. Transpower therefore has a significant interest in contributing to the process of developing an effective, workable and efficient district plan where it may affect the National Grid, including possible future changes.

Central Otago District Transmission Assets

Transpower has a number of overhead, substation and telecommunications assets within the Central Otago District, comprising the following:

- Cromwell – Frankton A 110kV transmission line (CML-FKN-A) *
- Gore – Roxburgh A 110kV transmission line (GOR-ROX-A)
- Halfway Bush – Roxburgh A 110kV transmission line (HWB-ROX-A)
- Roxburgh – Islington A 220kV transmission line (ROX-ISL-A)
- Roxburgh – Three Mile Hill A transmission line (ROX-TMH-A)
- Invercargill – Roxburgh A 220kV transmission line (INV-ROX-A)
- Invercargill – Roxburgh B 220kV transmission line (INV-ROX-B)
- Roxburgh – Twizel A 220kV transmission line (ROX-TWZ-A).

*Asset located within Lot 3 DP526140 at 79 Barry Avenue, part of the Plan Change site

The above lines have a mixture of towers and pi-poles support structures. There are also four substations in the District, namely: Cromwell, Clyde, Naseby and Roxburgh.

A map of the assets is attached as Appendix A.

National Policy Statement on Electricity Transmission 2008

The need to operate, maintain, upgrade and develop the National Grid is a matter of national significance that is recognised in an RMA context by the National Policy Statement on Electricity Transmission 2008 ("NPSET").

The single Objective of the NPSET is:

"To recognise the national significance of the electricity transmission network by facilitating the operation, maintenance and upgrade of the existing transmission network and the establishment of new transmission resources to meet the needs of present and future generations, while:

- *managing the adverse environmental effects of the network; and*
- *managing the adverse effects of other activities on the network."*

Of relevance to the Plan Change, the NPSET recognises that ongoing investment in the National Grid and significant upgrades are expected to be required to meet the demand for electricity and to meet the Government's objective for a renewable energy future, therefore strategic planning to provide for transmission infrastructure is required.

Most transmission lines and substations were originally built in rural areas over open land which posed little to no constraint on the ability to operate, maintain, upgrade and develop the National Grid. Over time, urban boundaries have expanded and development has occurred under, and near the National Grid assets. Housing and other buildings and structures have been constructed under, and near, the National Grid without Transpower's knowledge or consent.

The NPSET was (in part) developed as a mechanism to provide better management controls. It contains policies which protect the National Grid from housing being constructed under and near it. The NPSET also acknowledges that the operation, maintenance, upgrading and development of the National Grid can be significantly constrained by third party activities and development and requires such impacts to be avoided. In particular, Policies 10 and 11 of the NPSET provide the following direction that is directly relevant to the scope of the Growth Strategy:

Policy 10:

“In achieving the purpose of the Act, decision makers must to the extent reasonably possible manage activities to avoid reverse sensitivity effects on the electricity transmission network and to ensure that the operation, maintenance, upgrading, and development of the electricity transmission network is not compromised.”

Policy 11:

“Local authorities must consult with the operator of the National Grid, to identify an appropriate buffer corridor within which it can be expected that sensitive activities will generally not be provided for in plans and/or given resource consent...”

In the context of the Central Otago District Plan, Policies 10 and 11 of the NPSET have been given effect to in the District Plan (particularly within Sections 12 and 13 District-Wide Matters and Performance Standards and Infrastructure, Energy and Utilities).

Specific Comments

In general, Transpower is neutral regarding the principle of rezoning the Plan Change area as proposed. The District Plan is required to appropriately recognise and provide for the National Grid by giving effect to the NPSET which, amongst other matters, requires district plans to identify transmission lines on planning maps.¹ The operative District Plan maps fulfil this requirement. Figure 1 below shows part of the District Plan Map 44 with the CML-FKN-A traversing the bottom right hand corner of the Plan Change site (the blue line), terminating at the Cromwell Substation (designation ref D198).

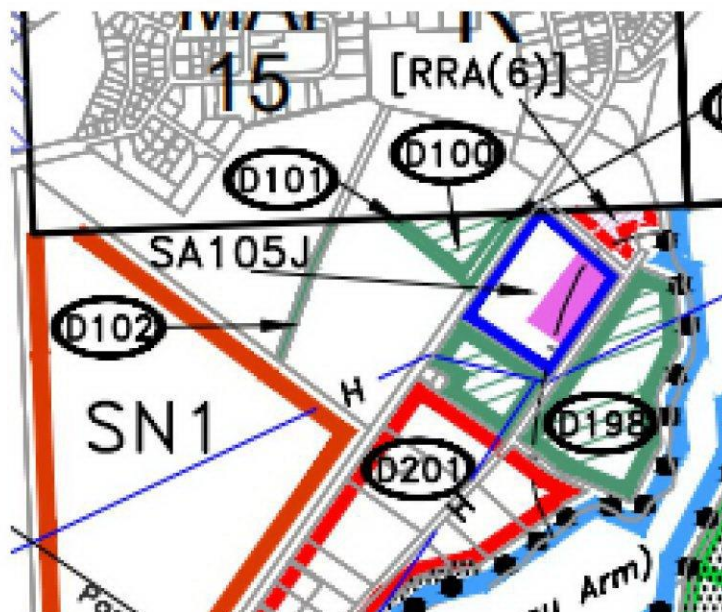


Figure 1: Part of Planning Map 44 showing the Transmission Line

¹ NPSET Policy 12

PC18 as notified did not include any proposed changes to operative Planning Map 44 and was not clear regarding the changes to the text of the operative District Plan that would align with Transpower's understanding of the plan change description. The National Grid transmission lines are a physical part of Lot 3 DP 526140 (79 Barry Avenue, Cromwell).

Transpower considers that the absence of an amended District Plan map to accompany PC18 means that it is unclear whether Policy 12 of the NPSET will continue to be given effect to in relation to the PC18 site. As a further consequence, there is no certainty that plan users will be alerted to the associated provisions in Sections 12 and 13 that regulate land use and development in proximity to the National Grid. Transpower assumes the Council intends that the National Grid will continue to be mapped, and the associated provisions will continue to apply, however this is unclear and the submission is made for the avoidance of doubt.

Further, the Section 32 report states under section 2.5 Statutory Documents (on page 12) that the only national policy statement of potential relevance to the plan change is the National Policy Statement on Urban Development 2020 (NPSUD). However, the NPSET is relevant to part of the plan change site and should have been referenced and assessed in the Section 32 report.

Transpower's specific relief is set out in Appendix 1.

Summary

Transpower is neutral regarding the principle of rezoning the Plan Change 18 Cromwell Industrial Extension, on the proviso that there are no changes that could impact on the National Grid.

Transpower wishes to be heard by the hearings panel appointed to make recommendations in respect of submissions on Plan Change 18 Cromwell Industrial Extension.

Transpower seeks that the hearings panel recommends that no changes are made to existing District Plan provisions in Chapters 12 and 13 that regulate land use and development in proximity to the National Grid and that any changes to the planning maps retain the existing transmission line through the site.

Contact details are as follows:

P: +64 3 590 7126

M: +64 21 118 5074

E: environment.policy@transpower.co.nz

Yours faithfully

TRANSPOWER NZ LTD



Trudi Burney
Senior Environmental Planner

Appendix 1: Relief Sought By Transpower New Zealand Limited

| Clause / Section | Title | Relief Sought | Amendment | Reason |
|-------------------------|-------------------------|----------------------|---|--|
| Planning Maps | Proposed Plan Change 18 | Oppose | Amend Operative District Plan Map 44 to show the extent of the area proposed to be rezoned and show the National Grid in a manner consistent with the Operative Plan Map version. | The Plan Change as notified is not accompanied by an amendment to the relevant Operative District Plan Map 44, indicating the extent of the area to be rezoned. Transpower opposes the Plan Change on the basis that it is therefore unclear whether the National Grid will continue to be mapped within the Plan Change area, as is required by Policy 12 of the NPSET. |
| Plan Change text | Proposed Plan Change 18 | Oppose | N/A | <p>The proposed changes to the operative District Plan include a new performance standard that is labelled 7.3.6 (vi) (j) in the Section 32 report. This numbering does not appear to match with the operative District Plan content and numbering. Transpower is therefore uncertain about the changes proposed and opposes the Plan Change as a consequence.</p> <p>Transpower wishes to ensure that no changes are proposed to Sections 12 and 13 of the operative District Plan, specifically the provisions that regulate subdivision, land use and development in the National Grid Yard and National Grid Corridor. These provisions give effect to Policies 10 and 11 of the NPSET and must continue to apply within the Plan Change site.</p> |

Appendix 2: Map of Transpower Assets in the Central Otago District

Transpower Assets

Central Otago District

Legend

Territorial Land Authority

Boundary

NZ Roads

Highways

Transpower Assets

Cable Protection Zone

Overhead Fibre Cable

Underground Fibre Cables

Site

ACSTN

COMMS

HVDC

TEE

Transmission Line

0kV Overhead

11, 66kV Underground

11, 33, 66 kV Overhead

110kV Underground

110 kV Overhead

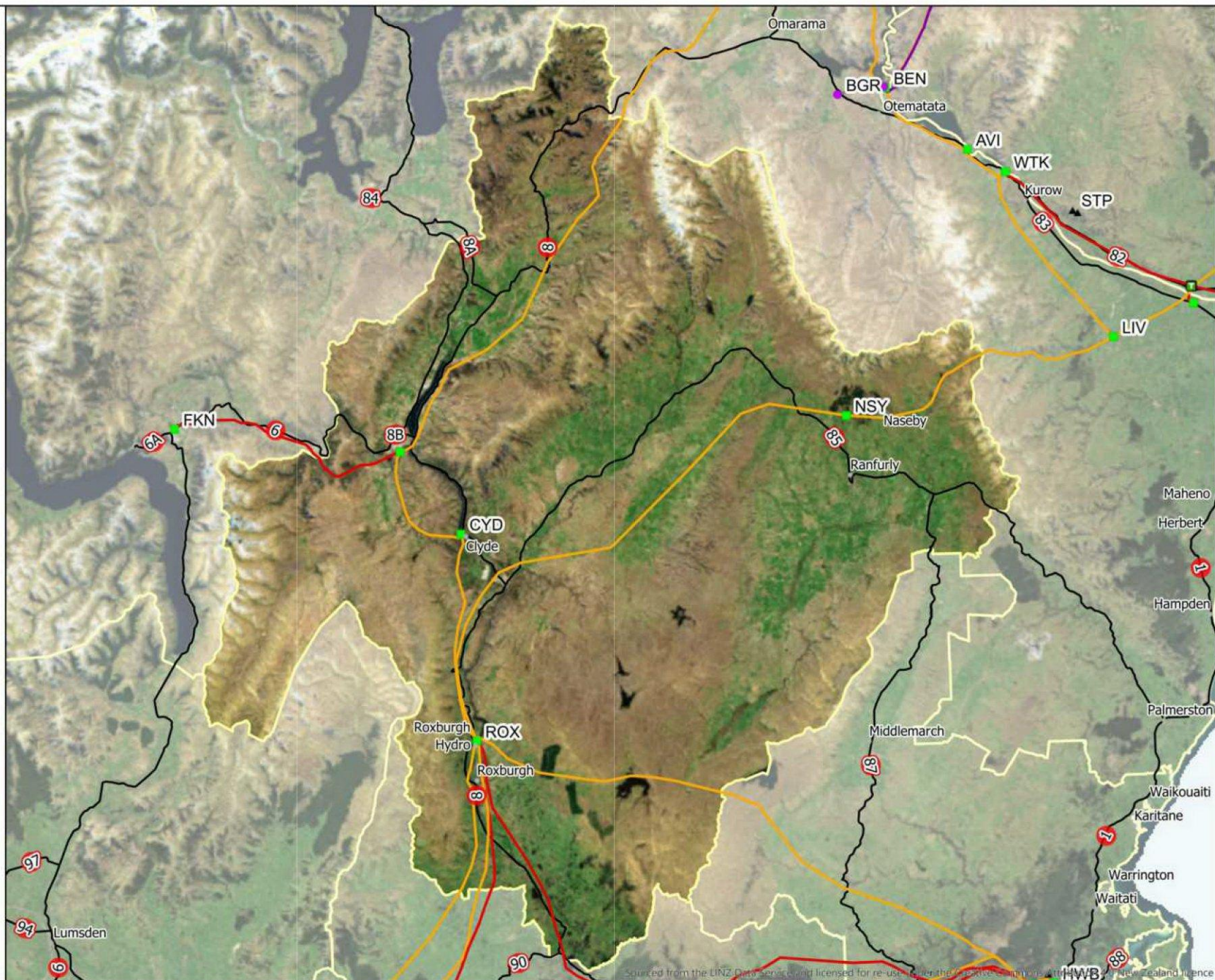
220kV Underground

220 kV Overhead

350 kV Overhead

350kV Submarine

400kV Overhead



External Disclaimer

This document is produced for external release. Its conclusions are based on the information currently available to Transpower and may change as further information becomes available either internally or externally.

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8/12/2021
CODC



1 Dunorling Street
PO Box 122, Alexandra 9340
New Zealand
03 440 0056



Info@codc.govt.nz
www.codc.govt.nz

Resource Management Act 1991

Submission on Notified Proposed Plan Change to Central Otago District Plan

Clause 6 of Schedule 1, Resource Management Act 1991

(FORM 5)

To: The Chief Executive
Central Otago District Council
PO Box 122
Alexandra 9340

DETAILS OF SUBMITTER

Name of Submitter: 45 SOUTH MANAGEMENT LTD

Postal Address: P.O. Box 46, CROMWELL
(Or alternative method of service under [section 352](#) of the Act)

Telephone: 027 221 9378

Email: tim.jones@45s.co.nz

Contact Person: TIM JONES CEO
(Name & designation, if applicable)

This is a submission on proposed Plan Change 18 to the Central Otago District Plan (the proposal).

I ~~am~~ am not* a trade competitor for the purposes of [section 308B](#) of the Resource Management Act 1991 (*select one)

~~*I/We am/am not (select one) directly affected by an effect of the subject matter of the submission that:~~

- ~~(a) adversely affects the environment; and~~
- ~~(b) does not relate to trade competition or the effects of trade competition.~~

~~*Delete this paragraph if you are not a trade competitor.~~

The specific provisions of the proposal that my submission relates to are:

(Give details, attach on separate page if necessary)

The whole of Plan Change 18.



OFFICIAL REGIONAL IDENTITY PARTNER

www.centralotagoz.com

This submission is:

(Attach on separate page if necessary) Include:

- whether you support or oppose the specific parts of the application or wish to have them amended; and
- the reasons for your views.

See attached.

I/We seek the following decision from the consent authority:

(Give precise details, including the general nature of any conditions sought)

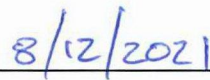
Plan Change 18 be approved.

- I support ~~oppose~~ the application ~~OR neither support nor oppose~~ (select one)
- I wish ~~do not wish~~ to be heard in support of this submission (select one)
- *I/We will consider presenting a joint case if others make a similar submission
*Delete this paragraph if not applicable.

In lodging this submission, I understand that my submission, including contact details, are considered public information, and will be made available and published as part of this process.



Signature



Date

**Submissions close in response to proposed Plan Change 18 at 4pm on
Thursday 9 December 2021**

Submissions can be emailed to districtplan@codc.govt.nz

Note to person making submission

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.

Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least 1 of the following applies to the submission (or part of the submission):

- it is frivolous or vexatious;
- it discloses no reasonable or relevant case;
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further;
- it contains offensive language;
- it is supported only by material that purports to be independent expert evidence but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

45 South Management

PO Box 46

Cromwell



Plan Change 18 Submission

1. We support Plan Change 18 in its entirety.
2. Horticultural activities rely on local industry to manufacture, store, maintain and repair equipment used in our own operations.
3. It is vital to our own success that such industries are locally available.
4. For these reasons, sufficient land needs to be zoned for current and future industrial use in Cromwell.
5. The rezoning proposed includes a small area of land currently planted in cherry trees. These trees are now "*at end of life*", and producing varieties which are no longer popular in the market.
6. A potential loss of a small area of land is inconsequential. There is a lot of land in the area suitable for horticulture and viticulture.
7. Removal of the orchard area adjacent to existing commercial zoned land will have the positive effect of removing spray drift potential, noise from machinery and wind machine operation and bird shooting activities.
8. The adjacent commercial land already has residential activities (Harvest Park etc.) so this plan change will assist in mitigating reverse sensitivity issues.

RECEIVED
9/12/2021
CODC



Department of Conservation
Te Papa Atawhai

9th December 2021

Central Otago District Council,
PO Box 122
Alexandra 9340

Email – districtplan@codc.govt.nz

To whom it may concern,

SUBMISSION ON PLAN CHANGE 18 TO THE CENTRAL OTAGO DISTRICT PLAN

Please find attached a submission on behalf of the Director-General of Conservation in respect of Plan Change 18 to the Central Otago District Plan – Cromwell Industrial Zone Extension.

The Director-General recognises the need for the consolidation of development, in this case industrial development in Cromwell, and that this change is in keeping with the Cromwell Spatial Plan established in 2019.

The key issue to the Department of Conservation is the potential adverse effects the proposed extension of the industrial zone will have on the protected habitat within the adjacent Cromwell Chafer Beetle Nature Reserve in its current state. These potential adverse effects could be managed through mitigation and control measures in a revised plan change

The attached submission provides some further detail on this issue and details relief sought to potentially address my concerns.

If you have any questions or would like to discuss this submission, please contact Geoff Deavoll on 027 536 7020 or gdeavoll@doc.govt.nz

Ngā mihi,

A handwritten signature in black ink that reads "Holmes".

Nicola J. Holmes
Pou Matarautaki, Operations Manager
Central Otago District
Department of Conservation

RESOURCE MANAGEMENT ACT 1991

SUBMISSION ON PROPOSED PLAN CHANGE 18 TO THE CENTRAL OTAGO DISTRICT PLAN

TO: Central Otago District Council

SUBMISSION: Proposed Plan Change 18 to the Central Otago District Plan (**Plan Change 18**) Cromwell Industrial Zone Extension

SUBMITTER: Director-General of Conservation

ADDRESS FOR SERVICE: Department of Conservation
Private Bag 4715
Christchurch Mail Centre
Christchurch 8140

Ph: 027 536 7020
Email: gdeavoll@doc.govt.nz

STATEMENT OF SUBMISSION BY THE DIRECTOR-GENERAL OF CONSERVATION

Pursuant to Clause 6 of the First Schedule, Resource Management Act 1991 (RMA), I Nicola Holmes, Operations Manager, Central Otago District, submit the following on behalf of the Director-General of Conservation:

SCOPE OF SUBMISSION

1. This submission relates to proposed Plan Change 18 in its entirety.

NATURE OF SUBMISSION

2. The Director-General of Conservation (**'the Director-General'**) opposes Plan Change 18 in part. The reason for this being the potential for adverse effects on the habitat contained within the Cromwell Chafer Beetle Nature Reserve to arise from enabling industrial development to occur on the adjacent land owned by Central Otago District Council.
3. My submission seeks that the Plan Change limit development on the land at the southern boundary of the industrial zone extension to limit the potential for future development to adversely affect the significant habitat values of the adjacent reserve.

BACKGROUND

4. The Director-General has all the powers reasonably necessary to enable the Department of Conservation (**'the Department'**) to perform its functions. A function of the Department is to advocate for the conservation of natural and historic resources generally. Section 2 of the Conservation Act 1987 defines 'conservation' to mean *'the preservation and protection of natural and historic resources for the purpose of maintaining their intrinsic values, providing*

for their appreciation and recreational enjoyment by the public, and safeguarding the options of future generations’.

5. The Director-General could not gain an advantage in trade competition through this Submission.

REASONS FOR SUBMISSION

6. The decisions sought in this submission are required to ensure that Private Plan Change 18:
 - a. promotes the sustainable management of natural and physical resources as required by Part 2 of the RMA;
 - b. provides for the protection of areas of significant indigenous vegetation and significant habitats of indigenous fauna as required by section 6 (c) of the RMA;
 - c. has particular regard to the intrinsic values of ecosystems as required by section 7 (d) of the RMA;
 - d. is otherwise consistent with Part 2 of the RMA.
7. Section 6(c) of the RMA states:
 6. **Matters of national importance**
In achieving the purpose of this Act, all persons exercising functions and powers under it, in relation to managing the use, development, and protection of natural and physical resources, shall recognise and provide for the following matters of national importance:
...
 - (c) The protection of areas of significant indigenous vegetation and significant habitats of indigenous fauna.
8. A district plan must give effect to the partially operative Otago Regional Policy Statement 2019 ('ORPS'). Objectives and policies relevant to the protection of significant indigenous vegetation and significant habitats of indigenous fauna (and protection of indigenous biodiversity more generally) are set out in Part B Chapter 3 of the ORPS. Policies in the ORPS include:
 - Objective 3.1 – The values (including intrinsic values) of ecosystems and natural resources are recognised and maintained, or enhanced.
 - Policy 3.1.9 – Ecosystems and indigenous biological diversity – this policy requires ecosystems and indigenous biological diversity in terrestrial environments to be managed to maintain ecosystem health and indigenous biological diversity.
 - Objective 3.2 – Otago’s significant and highly-valued natural resources are identified and protected, or enhanced where degraded
 - Policy 3.2.2 – Managing significant indigenous vegetation and significant habitats of indigenous fauna – this policy requires significant adverse effects on values of the habitat to be avoided, remedied or mitigated.

9. In this case the presence of 'Threatened' and 'At Risk' species and the rarity of their habitat within the nature reserve would classify the habitat within the nature reserve as significant against the significance criteria in the ORPS. Therefore Objective 3.2 and Policy 3.2.2 are particularly relevant to this plan change.
10. The Cromwell Chafer Beetle Nature Reserve (CCBNR) is an extremely rare inland dune system which provides habitat to the Cromwell Chafer Beetle, *Prodontria lewisii*. This is the only remaining habitat for these beetles in the world and they are restricted to this site.
11. The reserve also supports a suite of other native invertebrates, some endemic to Central Otago. These include; Sand scarab (*Pericoptus* sp.), *Costelytra zealandica*, numerous moth and butterfly taxa, cicada and spiders (including *Anoteropsis* – wolf spiders). Native birds such as pipits, oystercatchers, gulls, dotterel, kahu and karearea visit occasionally.
12. An important feature of the reserve is the salty soils and sand dunes. This is the only remaining example of this type of habitat in the ecological district. Although modified, the remnant natural features are highly significant. Native plant species including the Nationally Vulnerable sedge *Carex albula* and 'At Risk' woodrush *Luzula celata* depend on this habitat.
13. The reserve is one of few remaining examples of old glacial outwash surfaces in the upper Clutha basin (up to 25,000 years old). These were formed by unique local climatic and glacial conditions. Today, the surface on which the Chafer beetle survives is increasingly compromised by changed land use.
14. The Department manages the reserve, maintains the dune habitat, and manages the Cromwell Chafer beetle population. This includes pest control of redback spiders, mustelids, rabbits and hedgehogs. There is ongoing research into the ecology of the Cromwell Chafer beetle with an overarching goal of developing a translocation proposal and habitat monitoring.
15. Potential effects from industrial development on land to the north of the reserve include potential changes in the micro-climate through shading and sheltering the edge of the reserve from the harsh elements that contribute to the unique habitat requirements for the threatened fauna within the reserve.
16. Also, the potential for effects of artificial lighting on adjacent building has the potential to impact on the Chafer Beetle. While the lighting provisions for the industrial zone currently in the District Plan require light spill over the boundary to be avoided, there remains potential for effects from the cumulative effect of increase lighting on land adjacent to the reserve.
17. Changes in hydrology at a localised scale also has potential to impact on the nature of the reserve. This includes potential runoff of rainfall from hardstand areas overland into the reserve compromising the dry land characteristics of the reserve at the boundary.
18. As well as the concerns above there is the potential for an increase in mammalian pests and weeds spread through potential development activities on the land adjacent to the reserve, with potential for increase in management requirements for DOC at this site.
19. All of these potential effects combined have the potential to further reduce the area land within the nature reserve that is available as habitat for the Cromwell Chafer Beetle.

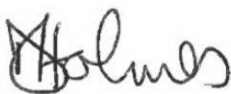
20. While the standard setbacks in the industrial zone where the zone adjoins land of another zone (7.5 metres) provide a buffer from activities on adjacent land, I do not expect that these setbacks when included in the plan, had in mind that the industrial zone was located adjacent to a nature reserve providing the only limited habitat for a threatened invertebrate species. I consider these setbacks to not be sufficient to avoid the potential effects on the reserve discussed above.

RELIEF SOUGHT

21. The Director-General opposes the proposed Plan Change 18 in the form as notified.
22. The Director-General seeks that a 25-metre-wide strip of land at the boundary with the Cromwell Chafer Beetle Nature Reserve is removed from the proposed industrial zone for the purpose of avoiding potential edge effects as described above.
23. It would be preferable if the strip of land removed from the proposed industrial zone, could be instead zoned as open space, which would have the dual effect of limiting future development in that buffer, while also providing for public access to the area around and to the reserve.
24. Alternatively, a no building restriction could be appended to the proposed industrial zoning to limit development close to the boundary with the reserve and to provide an appropriate buffer.
25. I do wish to be heard in support of my submission.

DATE: 9th December 2021

Ngā mihi



Nicola J. Holmes
Pou Matarautaki, Operations Manager
Central Otago District
Department of Conservation
Acting pursuant to delegated authority
on behalf of the Director-General of Conservation

A copy of the Instrument of Delegation may be inspected at the Office of the Director-General of Conservation.

RESOURCE MANAGEMENT ACT 1991

Submission on Plan Change 18 – Cromwell Industrial Extension

By: Central Otago District Council

To: Central Otago District Council
PO Box 122
Alexandra 9340

Submitter: Waka Kotahi NZ Transport Agency
PO Box 1479
CHRISTCHURCH 8011

Pursuant to the First Schedule of the Resource Management Act 1991 (RMA), **Waka Kotahi NZ Transport Agency** (Waka Kotahi) hereby makes this submission in **opposition** to an application by Central Otago District Council to rezone 52 hectares of Rural Resource Area (Rural Residential notation) to Industrial Resource Area.

The site is located on the southern fringe of the existing Cromwell Industrial Resource Area. All land subject to the plan change is zoned Rural Resource Area. The site is roughly bordered by State Highway 6 (SH6) to the west, Cemetery Road to the south, Bannockburn Road to the east, and the edge of the existing Cromwell Industrial Resource Area to the north.

WAKA KOATHI NZ TRANSPORT AGENCY'S SUBMISSION:

Plan Change 18 seeks to rezone 52 ha of Council owned land (currently zoned Rural Resource Area) to Industrial Resource Area. The site subject to the proposed plan change is bounded by SH6 to the east and north-east. The plan change is to give effect to the Cromwell Spatial Plan by extending the industrial area in Cromwell. The proposed rezoning will also include an additional area fronting onto SH6 between Cemetery Road and McNulty Road.

The Section 32 report states one of the primary effects associated with the plan change is likely to be adverse effects on the transport network and then goes on to note a traffic report commissioned indicated pressure from existing and proposed industrial development would impact the intersections of McNulty Road and Cemetery Road with SH6 and the intersection of McNulty Road and Barry Avenue. The traffic report discussed in the Section 32 report has not been notified as part of the Plan Change documentation.

The requestor also proposes a new performance standard as follows:

7.3.6 (vi) (j) Access – Cromwell Industrial Extension

a) Access to properties in the Cromwell Industrial Extension shall be from existing and future legal roads and constructed in accordance with Rule 12.7.1 on page 12:13 provided that there shall be no direct property access to the following roads:

1. *Bannockburn Road*

2. *State Highway 6*

b) *Any new intersection with Bannockburn Road from the Cromwell Industrial Extension will be constructed to a standard suitable for light vehicles only.*

Reason Restricting property access will minimise the impact of heavy vehicles on the safety and efficiency of the roading network.

Cross Reference Policy 9.2.5 Breach: Non-Complying see Rule 9.3.5

Waka Kotahi has statutory functions, as defined under Section 95 of the Land Transport Management Act 2003. In submitting on this proposal, Waka Kotahi seeks to give effect to the following statutory functions:

- To contribute to an effective, efficient, and safe land transport system in the public interest;
- To manage the state highway system, including planning, funding, design, supervision, construction, and maintenance and operations; and
- To assist, advise, and co-operate with approved organisations (such as regional councils and territorial authorities).

Waka Kotahi has reviewed Plan Change 18 and has the following concerns:

Otago Southland Regional Land Transport Plan 2015–2021

The Otago Southland Regional Land Transport Plan (OSRLTP) recognises the importance of the Safe System approach for improving road safety, including for vulnerable road users. Waka Kotahi requests that the applicant provides further detail on how the proposal affects the relevant intersections with State Highway 6 and how these will be made Safe Systems compliant.

Otago Regional Policy Statement

Chapter 9 of the RPS acknowledges the importance of sustainable transport. Policy 9.5.3 seeks to promote the use of fuel-efficient modes of transport, encourage a reduction of emissions from transport, and provide a safer transport system. Further assessment is required to understand the potential effects of development and determine the extent to which the plan change will result in industrial development that is consistent with *Chapter 9 – Built Environment* of the RPS.

Objective 4.5 and Policy 4.5.2 of the Partially Operative Regional Policy Statement recognise the need for urban growth and development to occur in a strategic and co-ordinated way, and to integrate infrastructure with land use.

The urban form and development objectives and policies within the Proposed Regional Policy Statement are also relevant to Plan Change 18 particularly where they discuss integration of landuse with planned development of infrastructure, additional infrastructure and facilitating the safe and efficient ongoing use of regionally significant infrastructure, including how this infrastructure will be provided and by whom.

If the proposed plan change is inconsistent with the Otago Southland Regional Transport Plan and the RPS, then it is not considered appropriate for the plan change to be approved. Further evidence is required from the applicant to confirm that the plan change will enable the safe and efficient operation of the transport network and provide for strategic and co-ordinated development.

Incomplete Section 32 Report: Effects on SH6

Waka Kotahi is supportive in principle of the intent to extend the Cromwell Industrial area. However, the Section 32 Report notes there are likely effects on the intersections with the state highway but does not address what the scale or significance of these effects will be, propose mitigation or who will be responsible for this mitigation.

Waka Kotahi is aware of the traffic report commissioned by Council as it was discussed at the consultation meeting between the Council and Waka Kotahi as were concerns around the additional traffic generation from the extension of the Cromwell industrial zone on intersections with SH6. At this meeting Council discussed the possibility that two roundabouts may be required, one at Cemetery Road and another at McNulty Road where they intersect with SH6. However, Waka Kotahi has not had an opportunity to review the traffic report and it has not been included in the documentation notified as part of Plan Change 18.

Waka Kotahi, therefore, consider the Section 32 report deficient, as it does not address the potential effects of the proposal on SH6, a key physical resource. As a result, the conclusion that the proposed Plan Change as notified is the most appropriate way to achieve the purpose of the Resource Management Act 1991 (the Act), as required under Section 32 (1) of the Act is not properly founded.

However, Waka Kotahi notes that the proposed addition of performance standard 7.3.6 which restricts property access directly onto SH6 is supported.

SH6 Intersection Improvements

We understand that the proposed plan change is necessary to give effect to the outcome of the Spatial Plan which was the result of community consultation. Waka Kotahi recognises that the Spatial Plan will help shape the future growth of Cromwell and as evidence by this plan change notification, provide policy direction and eventually influence the review of the District Plan. However, the Spatial Plan outcomes in themselves do not provide detail on where and who will provide for the necessary infrastructure that is required from this growth.

The Section 32 report does not address the effects of the proposal on the state highway or what potential upgrades may be required to the state highway intersections. Effectively, it appears the applicant is seeking to provide a development that will potentially have a significant effect on the state highway asset, without any indication of contributing to avoiding, remedying or mitigating those effects.

There seems to be an underlying assumption that any state highway intersection improvements will be undertaken in due course regardless of whether this plan change is adopted. Waka Kotahi notes that these intersections are not on any programme for upgrading and are not included in the National Land Transport Plan for funding in the 2021–2024 period or beyond. Even if intersection improvements were able to be funded by Waka Kotahi, the requestor has not initiated the appropriate process to establish what, if any investment is warranted.

Consequently, there is no certainty if or when improvements to the potentially affected intersections may occur given the current competitive funding environment. As a result, it appears to Waka Kotahi that the users of SH6 are expected to tolerate adverse effects on the state highway, from the plan change until intersection improvements can be funded and completed, given no other mitigation measures are proposed by the requestor.

Waka Kotahi is concerned that the proposal does not have regard to the sustainable management of the state highway as a physical resource – and that when effects on the state highway are significant enough, the Crown will fund the necessary improvements. Waka Kotahi consider that where there are adverse effects or potential

adverse effects on the long-term management and delivery of the state highway, the party that results in these effects should be responsible (if not fully, then at least in part) for addressing those effects.

WAKA KOTAHI NZ TRANSPORT AGENCY WISHES THE CONSENT AUTHORITY TO:

Unless the issues raised above, including addressing the potential effects of the proposal on the state highway intersections safety and efficiency are provided for, then Waka Kotahi requests that the Plan Change is withdrawn or declined.

Waka Kotahi is open to discussing the proposal further with the applicant and Central Otago District Council to reach a suitable agreement whereby the Plan Change can be approved subject to an appropriate assessment of effects from the proposal on SH6 and inclusion of suitable mitigation to address the issues raised in this submission.

Waka Kotahi NZ Transport Agency wishes to be heard in support of this submission.

Dated at Christchurch this 9th day of December 2021.



Richard Shaw
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Waka Kotahi NZ Transport Agency

Pursuant to authority delegated by Waka Kotahi NZ Transport Agency

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