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17 September 2024

Hartley Road Partnership
C/- Peter Dymock
Pattersons
PO Box 103
Alexandra 9340

Dear Sir/Madam

FURTHER INFORMATION REQUIRED FOR PLAN CHANGE 23

Location: SPRINGVALE ROAD, CLYDE

**Proposal: RE-ZONE LAND AT SPRINGVALE ROAD AND STATE HIGHWAY 8
FROM RURAL RESOURCE AREA TO INDUSTRIAL RESOURCE AREA**

The request has been reviewed and has been found to require further information under Clause 23(1) of Schedule 1 of the Resource Management Act 1991.

Please forward the following information/material at your earliest convenience:

- An updated s32 assessment that considers whether the objectives of the request are the most appropriate way to achieve the purpose of the RMA. Section 32(1)(a) requires this assessment be undertaken for all evaluation reports written under this section.
- An updated s32 assessment that considers the request against the objectives and policies in Section 12 of the District Plan. The request proposes changes to rules in Section 12 but provides no assessment of the proposed new rules against the other provisions in this section.
- An archaeological assessment of the water race. Specifically, this assessment should consider all likely effects of industrial development and propose permitted activity standards that would avoid those effects (ie setbacks from the water race). Proposed Rule 9.3.6.iv.e is not considered to have sufficient certainty regarding what actions are required to avoid effects to function as a permitted activity standard.
- A breach of Rule 9.3.6.iv.d and e is proposed to be a restricted discretionary activity under Rule 9.3.3.i. No changes to the matters of discretion are proposed. It is not considered that the matters in Rule 9.3.3.i will be sufficient to cover all matters that may be relevant to an application for resource consent to breach those standards, for example effects on archaeological or heritage values associated with a breach of Rule 9.3.6.iv.e. Please provide an updated list of matters of discretion for Rule 9.3.3.i to factor in these matters, along with any consequential changes to the assessment in the request. Alternatively, please provide an updated s32 assessment that considers the appropriateness of the current matters of discretion to address the effects of a breach of Rules 9.3.6.iv.d and e.
- A summary of the information provided to Aukaha and NZTA as part of initial consultation, along with a summary of any changes made to the request as a result of

this consultation to give context to the response letters provided with the assessment of effects.

- An updated transport assessment that includes the dates, times and durations of Carriageway Consulting's traffic counts, and what percentage of vehicles were heavy and light.
- The economic assessment considers the short term benefits during the construction phase only. An updated economic assessment that considers the long-term use of the land for industrial purposes when assessing the benefits and costs of the proposal is required. Clause 3.6(1)(c) of the National Policy Statement for Highly Productive Land 2022 requires consideration of the economic, social and cultural benefits of the new use of the land, not just benefits from construction activity on the land.
- The economic assessment assumes that any and all constraints mean land is not feasible for development. For example, on visual inspection, over half of the land identified as unviable due to sloping terrain in the "Alexandra East" industrial area (Assumed to be Lot 21 DP 432706 and Lot 1 DP 429123) is mostly flat. No indication is provided of what level of slope makes a site unviable, suggesting that the assessment has assumed any slope above 0° is unviable for industrial land uses. Land identified as unviable in Cromwell due to being planted in horticulture (Assumed to be Lot 1 DP 605263) is currently in the process of being developed for industrial purposes. Please provide an updated economic assessment explaining why these assumptions have been used, a description of the "other constraints" considered, and amend any supply figures used to factor in land initially considered to be unviable due to site constraints, but which may be viable based on any changes made to the assumptions about site constraints.
- The Infrastructure Report overstates the preliminary discussions had with Council staff prior to the lodging of the request. In the meeting there was no acceptance or approvals of any specific infrastructure connections or network design. Please amend the document to remove any reference to approvals or agreements with Council staff as no such approvals have been given.

Councils Three Waters team have indicated that they are not opposed in principal to the proposal but there may be a matter of timing in terms of wastewater modelling currently underway and any necessary upgrades to the Alexandra Wastewater Treatment Plant that modelling identifies. There are a number of variables including legislative changes from Central Government anticipated in December and the infrastructure programme that is being put together for the LTP that will be subject to Council approval.

For the purposes of the requested plan change the matter for discussion at this stage is whether or not there is sufficient capacity to service the site for both water and wastewater. Specific connections into Councils network, location of pump stations etc would be matters considered at the time of subdivision.

Please note that, after this request is responded to, Council intends to commission peer reviews of the transport and economic assessments provided in support of the request. The need for any peer reviews will be confirmed once the requested information is received.

Responding to this request:

Following the receipt of this letter you must either:

- Provide the requested information; or
- Provide written confirmation that you do not agree to provide the requested information.

The processing of your request has been put on hold from 17th September 2024

If you do not agree to provide the requested information, then please provide written confirmation of this to the Council.

While Clause 23 of Schedule 1 does not specify any time limit for the provision of information, Council advises that, if the requested information is provided prior to Wednesday 2nd October 2024, it will be able to have the request considered for processing at Council's 30th October 2024 meeting. If accepted, this may allow the first public notification of the request to occur within the 2024 calendar year. Otherwise, notification of the request may not occur until the 2025 calendar year.

Restarting the processing of your request

The processing of your request will restart:

- When all of the above requested information is received, or
- From the date that you have provided written confirmation that you do not agree to providing the requested information.

Once the processing of the request restarts:

If you have not provided the requested information then your request will continue to be processed and determined on the basis of the information that you have provided with the request. The Council may decline the request on the basis of insufficient information.

If you have provided all the requested information, then we will consider its adequacy and make a decision on whether to accept the request for consideration.

Please do not hesitate to contact the writer on (03) 4400056 if you have any questions or concerns regarding the above request or the further processing of the application.

Please do not hesitate to contact me if you have any queries.

Yours faithfully

Adam Vincent
Planning Officer – Intermediate