

1 October 2024

The Central Otago District Council  
PO Box 122  
Alexandra

Attn: Adam Vincent  
By email [adam.vincent@codc.govt.nz](mailto:adam.vincent@codc.govt.nz)

Dear Adam

### **FURTHER INFORMATION : PLAN CHANGE 23**

Your request for further information dated 17 September 2024 refers . I respond to your request as follows:

#### Bullet Point 1

Paragraph 2 of the section 32 assessment fully covers the various options available under the Resource Management Act 1991 (RMA91) for achieving the objectives of the Request . Paragraph 3 evaluates these options and concludes that the option of a re-zoning of the site is the most appropriate way of achieving the objectives of the Request under the RMA91. A further conclusion has been added to paragraph 3 of the sec 32 assessment which addresses Part 2 section 5 RMA91 ( Purpose of the RMA91)

#### Bullet Point 2

An assessment against the objectives and policies of Section 12 of the District Plan has been added to Paragraph 4 of the section 32 assessment

#### Bullet Point 3

The request has been amended to exclude the steeper ( undevelopable) terrace riser slopes , including the defunct water race , from the Request . The water race therefore remains in the Rural Resource Area and there is no change to the status quo of the race in relation to the provisions of the District Plan, which include consideration of heritage matters and the protection of races on any subdivision in the Rural Resource Area .

An archaeological assessment of the race is consequently not necessary and no modifications to the provisions of the Industrial Resource Area provisions in the District Plan are required . Such an assessment is likely to cost in the order of \$5-\$10k , take 1 – 3 months and conclude what is already accepted : ie the race is pre-1900 and is subject to the provisions of the Heritage New Zealand Pouhere Taonga Act 2014 . As such, an archaeological authority is required to destroy or disturb the race which will have to include an archaeological assessment at that time . Such matters are best addressed at the subdivision/ land development stage , rather than overly complicating the District Plan with site specific rules . A consent notice on the relevant titles has been widely accepted by CODC as the standard method of addressing the protection of historic water races on subdivision in the Rural Resource Area .

### **patersons.co.nz**

<b>Dunedin</b> PO Box 5933 Dunedin 9054 03 477 3245	<b>Queenstown</b> PO Box 2645 Wakatipu Queenstown 9349 03 441 4715	<b>Wānaka</b> PO Box 283 Wānaka 9343 03 443 0110	<b>Cromwell</b> PO Box 84 Cromwell 9342 03 445 1826	<b>Alexandra</b> PO Box 103 Alexandra 9340 03 448 8775	<b>Oamaru</b> Level 2 19 Eden Street Oamaru 9400 03 443 8727	<b>Christchurch</b> PO Box 9194 Tower Junction Christchurch 8149 03 928 1533
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I also note in this case that the race needs to be retained as a stormwater cut-off drain as recommended by Geosolve in its Geotech report.

Consequential amendments to the Request , Sec 32 assessment and Assessment of Environmental Effects have been made to remove any references to the protection of the race . A letter from Mike Moore Landscape Architect (who prepared the Landscape Assessment ) is attached confirming that that the retention of the terrace riser slopes, including the water race, in the Rural Resource Area will enhance the landscape integrity of the terrace riser feature.

#### Bullet Point 4

Proposed rule 9.3.6 (iv) ( e ) has been deleted from the Request as the water race is no longer included in the area subject to the Request . It is considered that the matters for discretion 1 & 3 under rule 9.3.3 sufficiently cover proposed rule 9.3.6 (iv) (d) as accepted by Council under PC11.

#### Bullet Point 5

Email correspondence with Aukaha and NZTA under the initial consultation with them is attached . No changes to the Request were made as a result of the consultation with Aukaha . The consultation with NZTA was incorporated into the preparation of the Transportation Assessment by Carriageway Consulting.

#### Bullet Point 6

See attached response email from Carriageway Consulting.

#### Bullet Point 7

See attached updated economic assessment and response letter from Savvy Consulting.

#### Bullet Point 8

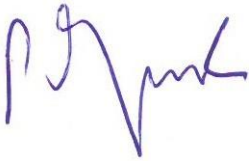
See attached updated economic assessment and response letter from Savvy Consulting.

#### Bullet Point 9

See attached updated infrastructure report . Suitable amendments have been made to paras 2.2, 2.3, 4 and 5.2.

At this point the outcome the wastewater modelling currently underway and any necessary upgrades of the Alexandra Wastewater Treatment Plant required as a result of the modelling is unknown. It is considered that the best way to deal with this issue is as part of the normal processing of the Request under Schedule 1 Part 2 of the RMA91 . The likely timing of this is such that the outcome of the modelling will be known prior to the hearing into the Request . There are options to deal with this that have been acceptable to Council in the past if the modelling shows that an upgrade of the treatment plant will be required to accommodate this proposal such as a rule similar to that adopted by PC 15 ( rule 7.3.5 (viii) (a) ) or by PC 19 (rule SUB R8 (5) – Future Growth Overlay : Clyde , Alexandra and Manuherikia) . The rationale used for PC19 was adopted from the PC15 precedent.

Yours faithfully



Peter Dymock  
Senior Surveyor/Planner

Encl :

- Updated Request
- Updated Sec 32 Assessment
- Updated Assessment of Environmental Effects
- Letter from Mike Moore Landscape Architect
- Email correspondence with Aukaha and NZTA
- Response email from Carriageway Consulting
- Updated Economic Assessment
- Response letter from Savvy Consulting
- Updated Infrastructure Report

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REQUEST FOR A CHANGE  
TO THE OPERATIVE  
CENTRAL OTAGO DISTRICT PLAN  
  
**HARTLEY ROAD PARTNERSHIP**

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## DOCUMENT CONTROL

<b>Project</b>	
<b>Client</b>	Hartley Road Partnership
<b>Project No.</b>	A502
<b>Version</b>	UPDATED
<b>Date of issue</b>	01 October 2024

## AUTHOR(S)

<b>Prepared</b>	Peter Dymock Patersons – Alexandra Office
<b>Reviewed</b>	Duncan White Partner / Senior Planner Patersons – Wanaka Office

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## 1.0 INTRODUCTION

### 1.1 The Requestor

The requestor is:

Hartley Road Partnership  
 c/- Leon van Boxtel  
 Hartley Road Partnership  
 RD1 Alexandra  
 Email: [leon@benchmarkconstruction.co.nz](mailto:leon@benchmarkconstruction.co.nz)

The address for service is:

c/- Paterson Pitts Limited Partnership  
 P O Box 103  
 ALEXANDRA 9340

Attn: Peter Dymock  
 Email: [peter.dymock@patersons.co.nz](mailto:peter.dymock@patersons.co.nz)  
 Phone: (03) 448 8775 (0274) 377 910

### 1.2 Overview

Hartley Road Partnership (“HRP”) requests a change to the Operative Central Otago District Plan (“the ODP”) to re-zone approximately 5.6ha of land , located at the intersection of State Highway 8 (“SH8”) and Springvale Road , from Rural Resource Area [R] to **Industrial Resource Area [I]**.

The amendments proposed to the Plan are:

- The addition of 5.62ha of **Industrial Resource Area [I]** zoning to the Council’s on-line GIS planning maps as shown on the plan at **Appendix A** .
- An addition to Rule 12.7.1. (iii) *Access to Rural State Highways and Arterial Roads* to provide that there be no direct access to any subdivided allotment from the site to SH8 and Springvale Road and to provide for a suitable left turning lane from State Highway 8 into Springvale Road.
- An addition to Rule 9.3.5 (iv) Screening to provide for a landscaped buffer and prevention of development on the terrace riser above the historic water race traversing the site

No changes are proposed to the issues, objectives, methods of implementation, principle reasons for adopting objectives, policies and methods and environmental results anticipated in Sections 9 and 12 of the Plan.

The existing provisions in the ODP for the Industrial Resource Area are very enabling and will allow a wide range of industrial and commercial uses to establish within the site similar to that in the various existing industrial areas in the District, including limited residential and retail activity subject to existing rules restricting scale and activity and addressing reverse sensitivity effects .

## 2.0 THE SITE

A plan of the land subject to the request, along with an indicative subdivision layout is shown at **Appendix A**. Note this plan is not a plan of subdivision or a structure plan, but is simply provided as an illustration of the sort of development that could possibly eventuate on the site and as an aid to assessing the environmental impact of the Request.

The land is currently contained within the following record of title:

- Sec 1 Block XXXIV Town of Clyde and Part Block XXXI Town of Clyde and Block XXXII Town of Clyde and Part Block XXXIII and Part Block XXXIV Town of Clyde ( title area 6.1663 ha ) RT 51710 l owned by L F van Boxtel , JM Scott , CE Ramage & LMA Lodge ( “HRP” ) .

A copy of the above title is at **Appendix B**. The title is an amalgam of original town sections of Clyde and is “limited as to parcels”. The area of the title has been deduced by LINZ from a series of surveys taking land for roads and severances since the original town survey of Clyde in 1867. A survey ( LT 600773 ) has been undertaken to remove the limitations as to parcels and a copy is at **Appendix B** . By the time the Request is likely to become operative , the legal description of the site will be Lot 1 DP 600773 ( 6.6070ha) , RT 1170203. The title is currently subject to an easement in favour of the Manuherikia Irrigation Co-operative Irrigation Society Ltd over a defunct water race. This easement is being removed from the title.

The site is currently zoned “Rural” in the ODP and is not subject to any other notation on the planning maps. The terrace riser above the site is subject to a Significant Amenity Landscape Overlay ( “SAL” ). An extract from Council’s GIS planning mapping is at **Appendix C**. The site was formerly zoned “Industrial “ under the Transitional (Vincent) District Plan. See attached map from the Vincent Plan at **Appendix C**.

## 3.0 THE EXSISTING ENVIRONMENT

The site is located at north- east corner of the intersection of SH8 and Springvale Road on the periphery of the township of Clyde. The site is described in detail in the attached infrastructure, geotechnical, soil contamination and landscape reports at **Appendices H-K**

In summary the site is a triangle of land bound by :

- SH8 which is elevated above the site by the Clyde hill approach embankment.
- Springvale Road , part of the berm of which is occupied by a small pine plantation next to the SH8 intersection which is used as an informal carpark . Springvale Road adjacent to the site was formerly named Hartley Road and before that Hull Street. Springvale Road is identified in Schedule 19.7 of the ODP as an Arterial Road.
- A steep 60-80m high terrace riser, part of the more gentle lower slopes of which are included in the site. The riser immediately adjacent to the site forms part of the Clyde Town Belt Reserve. The terrace riser is in depleted dryland pasture, not currently being actively used for pastoral purposes . The riser forms an important landscape backdrop to Clyde and the wider Dunstan – Earnsclough Flat and is subject to an SAL. The SAL notation does not cover any part of the site.

- The NW boundary is an unformed legal road, a severed remnant stub of what was originally surveyed in 1867 as Orchard Street (formerly named Bridlington Street). It is highly unlikely this unformed legal road will ever be formed, not least that its gradient is a minimum of 1 in 3 and that there is no practical entrance to it off SH8.
- The Clyde Cemetery Reserve forms the eastern boundary, although it is noted that the historic stone wall “apparent boundary” of the cemetery is some 160m east of the site boundary.

The site has been used in the past as a poultry farm by the applicant’s parents and is presently used as a contractor’s storage yard. The site does not have an irrigation supply and has never been used for any productive rural use. Its present appearance is generally that of a bare, gravel wasteland.

The terminus of the Central Otago Rail Trail is directly across the opposite side of Springvale Road, as is land owned by Contact Energy Ltd which used for industrial storage purposes associated with the Contact’s operation of the Clyde and Roxburgh Dams, subject to a scheduled activity overlay of the site’s “Rural Residential Resource Area” zoning in the ODP.

Further along Springvale Road, the land is used for lifestyle block purposes with lot sizes being in the 1ha range, in accordance with its “Rural Residential” zoning in the ODP. The decision on PC 19 has re-zoned this area to “Future Growth – Large Lot Residential” which would allow subdivision down to 1500m<sup>2</sup>.

On the opposite side of SH8 is the Clyde township, generally consisting of lots averaging 800-1000m<sup>2</sup> with large standalone dwellings, a reflection of the minimum lot size required for un-reticulated areas in the ODP. The site is conveniently linked to Clyde township for walking and biking access by the Daphne Hull underpass linking Albert Drive with the Rail Trail terminus .

In summary , this end of Springvale Road close to its intersection with SH8 does not exhibit a rural pastoral character and none of the adjoining properties are being used for any productive rural use .

## 4.0 PURPOSE AND REASON FOR REQUEST

Clyde is the only significant urban area in the Central Otago District without any provision for Industrial land in the ODP . Even small rural townships such as Millers Flat, Patearoa, Naseby and Omakau have provision for industrial zoned land in the ODP.

A small parcel of land on the opposite side of Springvale Road is used for industrial storage purposes under a scheduled activity in the ODP. However industrial use of the site is restricted to the specific scheduled activity. The Economics Assessment prepared by Savvy Consulting Ltd at **Appendix F** in support of the Request has identified that there is a demand for Industrial land in close proximity to the Clyde Township. Industrial sites require good access to the transport network which is suitable for heavy vehicles and need to be well separated from incompatible land uses , in particular residential land. The site subject to the Request fulfils both of these requirements.

The purpose of the Request is therefore to provide a suitable site for industrial use in close proximity to the Clyde township to meet an identified demand for industrial land at Clyde. In effect this is a return to the previous zoning of the site under the Transitional District Plan.

## 5.0 PROPOSED CHANGES TO THE DISTRICT PLAN

The proposed changes to the District Plan are as follows:

- (i) Amend the on-line planning maps to insert a new Industrial Resource Area notation incorporating part of Lot 1 DP 600773 as shown on the plan at **Appendix A**.
- (ii) Amend/add to Rule 12.7.1 (iii) Access to Rural State Highways and Arterial Roads as follows:
  - (h) *There shall be no access to State Highway 8 from any development or subdivision of Lot 1 DP 600773 and no direct access to Springvale Road from any lot subdivided from Lot 1 DP 600773*
  - (i) *Prior to subdivision and industrial development occurring on Lot 1 DP 600773 the State Highway 8 / Springvale Road intersection shall be improved by providing a painted median such that the view to the right from Springvale Road is not obscured by a vehicle slowing in the left turn lane on State Highway 8 (that may otherwise obscure a following straight through vehicle).*
- (iii) Add *Rule 12.7.1 (ix) Breach of Standards* as follows:
 

*Any activity that does not comply with the standards stated in Rule 12.7.1 (iii) h –(i) shall be considered as a non-complying activity.*
- (iv) Amend/add to Rule 9.3.6 (iv) Screening as follows :
 

*(d) Within lot 1 DP 600773 a landscaped buffer strip with a minimum width of 10 metres shall be provided alongside the boundaries of State Highway 8 , Springvale Road , the Clyde Cemetery Reserve and the unformed legal road to the north of the site below an historic water race . The entire landscape strip shall be established at the time of initial subdivision of the site and its retention and future maintenance shall be provided for as a condition of subdivision consent that is to be subject to a consent notice.*

A breach of these proposed additions to Rule 9.3.6 (iv) is a restricted discretionary activity under existing Rule 9.3.3.

Proposed Rules 12.7.1 (iii) (i) and 12.7.1 (ix) have been adapted from Rules 7.3.6(vi) (i) and 7.3.6 (vi) (h) introduced into the ODP under PC15 (Clyde Residential Extension) for a similar reason at the State Highway 8 / Sunderland Street intersection at Clyde.

Proposed Rule 9.3.6 (iv) (d) has been adapted from Rule 9.3.6 (iv) (c) introduced into the ODP under PC11 (Old Cromwell Saleyard Industrial Zone extension) in accordance with the recommendations in the Landscape Assessment at **Appendix K**.

The request includes any necessary consequential changes to the plan required by the Council to accommodate the above proposed changes to the Plan.

## 6.0 STATUTORY MATTERS

### 6.1 Part 2 RMA91

#### 5. Purpose

- (1) *The purpose of this Act is to promote the sustainable management of natural and physical resources.*
- (2) *In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic, and cultural well-being and for their health and safety while –*
- a. *Sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and*
  - b. *Safeguarding the life-supporting capacity of air, water, soil, and ecosystems, and*
  - c. *Avoiding, remedying, or mitigating any adverse effects of activities on the environment.*

The request enables the well-being of the Clyde community and surrounding area by expanding the Industrial area to accommodate an identified demand for land in close proximity to Clyde in the most logical location for expansion. The life supporting capacity of air, water and soil will be maintained by the reticulation and disposal of wastewater into an established reticulation and treatment scheme.

The request includes provisions to avoid, remedy and mitigate adverse effects on the environment as to increased traffic generation and provision of suitable infrastructure.

#### 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:*

- (a) *The preservation of the natural character of the coastal environment (including the coastal marine area), wetlands, and lakes and rivers and their margins, and the protection of them from inappropriate subdivision, use, and development.*
- (b) *The protection of outstanding natural features and landscapes from inappropriate subdivision, use and development.*
- (c) *The protection of areas of significant indigenous vegetation and significant habitats of indigenous fauna.*
- (d) *The maintenance and enhancement of public access to and along the coastal marine area, lakes, and rivers.*

- (e) *The relationship of Maori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other taonga.*
- (f) *The protection of historic heritage from inappropriate subdivision, use, and development.*
- (g) *The protection of protected customary rights.*
- (h) *The management of significant risks from natural hazards.*

Paragraphs (a) and (d) are not relevant to this Request.

(b) The site does not contain any outstanding natural features or landscapes.

(c) The site does not contain any areas of significant indigenous vegetation and significant habitats of indigenous fauna.

(e) & (g) So far as is known, the site does not contain any sites of particular importance to Maori. The best way to deal with this issue is by way of discovery protocols as a condition of consent on any subsequent resource consents to subdivide or develop the site.

(f) A defunct pre- 1900 water race intersects the steep upper part of the site . The race will remain in in the Rural Resource Area and is not therefore subject to the Request .

(h) The site is not subject to any significant risk from natural hazards as per the attached geotechnical assessment.

## 7. Other Matters

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 have particular regard to –

- (a) *Kaitiakitanga*
- [(aa) *The ethic of stewardship*]
- (b) *The efficient use and development of natural and physical resources*
- [(ba) *The efficiency of the end use of energy*]
- (c) *The maintenance and enhancement of amenity values*
- (d) *Intrinsic values of ecosystems*
- (e) *Repealed*
- (f) *Maintenance and enhancement of the quality of the environment*
- (g) *Any finite characteristics of natural and physical resources*
- (h) *The protection of the habitat of trout and salmon*
- [(i) *The effects of climate change*]
- [(j) *The benefits to be derived from the use and development of renewable energy*]

Paragraphs (a), (aa), (ba), (d), (g), (h), (i), and (j) are not relevant to this Request.

(b) It is efficient to provide for industrial land that is close to and well linked to the existing township and the transport infrastructure.

(c) & (f) As discussed in the assessment of environmental effects in **Appendix D** , the site of the Request is a location that is well separated and buffered from other incompatible land uses, therefore there will be no adverse amenity effects on surrounding land owners or on the quality of the environment

No matters arise regarding Sec 8 (Treaty of Waitangi) of Part 2.



## 6.2 Section 73 and Schedule 1 RMA91

Under Section 73(2) of the Act any person may request a territorial authority to change a district plan, and the plan may be changed in the manner set out in Schedule 1. Clause 22 of Schedule 1 (Form of Request) requires that the request:

- *Shall be made in writing and shall explain the purpose of, and reasons for, the change to the plan and contain an evaluation report prepared in accordance with Section 32 for the proposed plan or change; and*

A Section 32 evaluation is attached at **Appendix E**.

- *Where environmental effects are anticipated, shall describe those effects, taking into account clauses 6 and 7 of Schedule 4, in such detail as corresponds with the scale and significance of the actual or potential environmental effects anticipated from the implementation of the change.*

An Assessment of Environmental Effects is attached at **Appendix D**.

Under Clause 25 of Schedule (1) the Council may reject the request in whole or in part but only on certain grounds:

- (a) *The request or part of the request is frivolous or vexatious; or*
- (b) *Within the last 2 years, the substance of the request or part of the request –*
  - (i) *Has been considered and given effect to, or rejected by, the local authority or the Environment Court; or*
  - (ii) *Has been given effect to by regulations made under Section 360A; or*
- (c) *The request or part of the request is not in accordance with sound resource management practice; or*
- (d) *The request or part of the request would make the policy statement or plan inconsistent with Part 5; or*
- (e) *In the case of a proposed change to a policy statement or plan, the policy statement or plan has been operative for less than 2 years.*

- The request is not frivolous or vexatious.
- Within the last 2 years, the substance of the request has not been considered by the Council or the Environment Court.
- The request accords with sound resource management practice.
- The request would not make the Operative Plan inconsistent with Part 5 of the Act.
- The District Plan has been operative for more than 2 years.

Preliminary discussions were held with Council's Planning & Engineering/3 Waters Departments in this matter and Council staff informally indicated that Council saw no insurmountable obstacles to this proposed Request from either a planning or infrastructure perspective.

## 6.3 Section 74 RMA91

Section 74 (2) (a) requires consideration of any Proposed Regional Policy Statement (PRPS) or Proposed Regional Plan (PRP). The PRPS is considered in the Sec 32 evaluation at **Appendix E**.

In summary, the Request is consistent with and gives effect to the PRPS. There are no relevant PRPs.

With regard to Section 74 (2) (b):

- The Otago Southland Regional Land Transport Plan prepared under the Land Transport Management Act 2003 is considered in the Sec 32 evaluation at **Appendix E**.
- There are no relevant entries on the NZ Heritage List/Rarangi Korero.

With regard to Section 74(2A). The Kai Tahu ki Otago Natural Resource Management Plan 2005 (NRMP) is considered in the Sec 32 evaluation at **Appendix E**.

With regard to Sec 74 (3), the Request does not involve any trade competition (other than competition in the industrial land and property market).

## 6.4 Sec 75 RMA91

With regard to Sec 75 (3) any relevant National Policy Statement, National Environmental Standard and the Regional Policy Statement (RPS) are considered in the Sec 32 evaluation at **Appendix E**.

In summary, the Request is consistent with all relevant NPS and NES and is consistent with and gives effect to the RPS.

Under Sec 75 (4) there are no relevant Regional Plan considerations. Any consents required under the Regional Plan to give effect to the development enabled by the Request will be applied for at the time of subsequent subdivision and/or development.

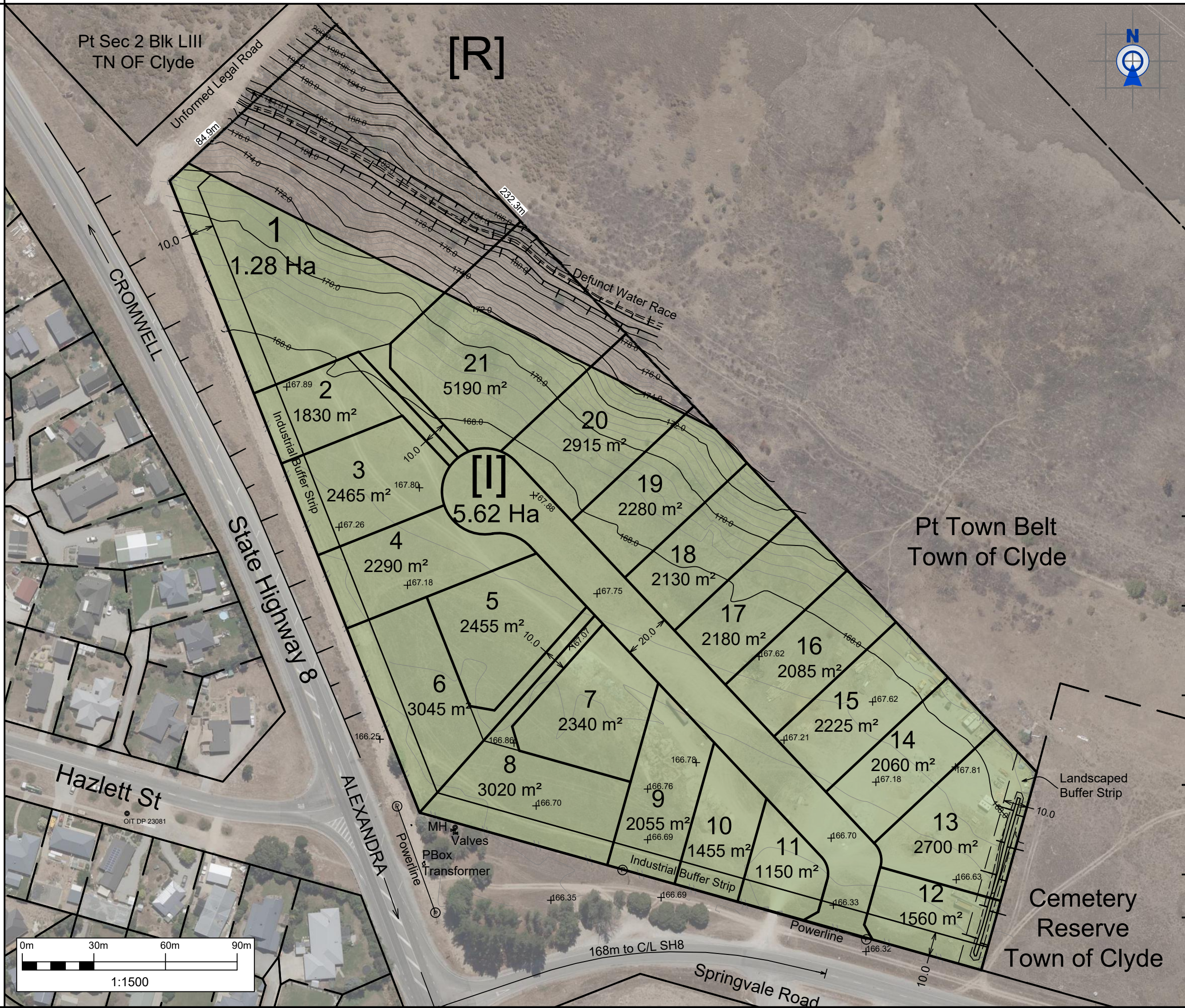
## 7.0 DOCUMENTS TO SUPPORT THE REQUEST

The following additional documents are appended to and form an integral part of the Request :

Appendix	Assessment	Title/Author	Date
D	Assessment of Environmental Effects	Paterson Pitts Limited Partnership (Peter Dymock)	September 2024
E	Sec 32 Evaluation	Paterson Pitts Limited Partnership (Peter Dymock)	September 2024
F	Economics Assessment	Economic Assessment : Savvy Consulting Ltd (Natalie Hampson)	September 2024
G	Integrated Transport Assessment	Carriageway Consulting (Andy Carr) Transport Assessment:	May 2024
H	Soil Contamination Assessment	Preliminary Site Investigation: Insight Engineering (Claude Midgely )	March 2024
I	Infrastructure Assessment	Paterson Pitts Limited Partnership (Myles Garmonsway)	September 2024
J	Geotechnical Assessment	Geosolve (James Stewart)	June 2024
K	Landscape Assessment	Mike Moore Landscape Architect	June 2024
L	Land Productivity Report	Paterson Pitts Limited Partnership (Peter Dymock)	May 2024

## Appendix 'A' - Land Subject to the Request





Coordinates are in terms of  
Lindis Peak 2000.

Elevation in Terms of:  
NZVD 2016 Level Datum

Origin of Levels  
IT DP 23081 (EWEG)  
RL= 166.30m

Contour Intervals = 0.50m

Land to be rezoned  
as industrial

**Note!**

- No direct access to SH8 or Springvale Road for any lot.
- Subdivision layout indicative only. (Not a structure plan)

**patersons.**  
Land Professionals

ALEXANDRA  
8 Skird Street  
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E alexandra@patersons.co.nz

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Client & Location:

Hartley Road Partnership

Purpose & Drawing Title:

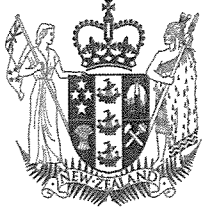
**PROPOSED ZONING PLAN  
PLAN CHANGE 23**

**FOR INFORMATION**

Surveyed by:	BD	Original Size:	Scale:
Designed by:		A3	1:1500
Drawn by:	KWG		
Checked by:	PD	<b>DO NOT SCALE</b>	
Approved by:	PD	Job No:	Revision No. / Date:
A5202	PLAN	Sheet No: 1	B / 27/09/2024



## Appendix 'B' - Records of Title



**RECORD OF TITLE  
UNDER LAND TRANSFER ACT 2017  
FREEHOLD  
Limited as to Parcels**



**Search Copy**

  
R.W. Muir  
Registrar-General  
of Land

**Identifier** 51710  
**Land Registration District** Otago  
**Date Issued** 07 February 2003

**Prior References**  
34384

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**Estate** Fee Simple  
**Area** 6.1663 hectares more or less  
**Legal Description** Section 1 Block XXXIV Town of Clyde  
and Part Block XXXI Town of Clyde and  
Block XXXII Town of Clyde and Part  
Block XXXIII and Part Block XXXIV  
Town of Clyde

**Registered Owners**

Leon Francis Van Boxtel, Jane Marie Scott, Christine Elizabeth Ramage and Lianneke Mechelina Adriana Lodge

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**Interests**

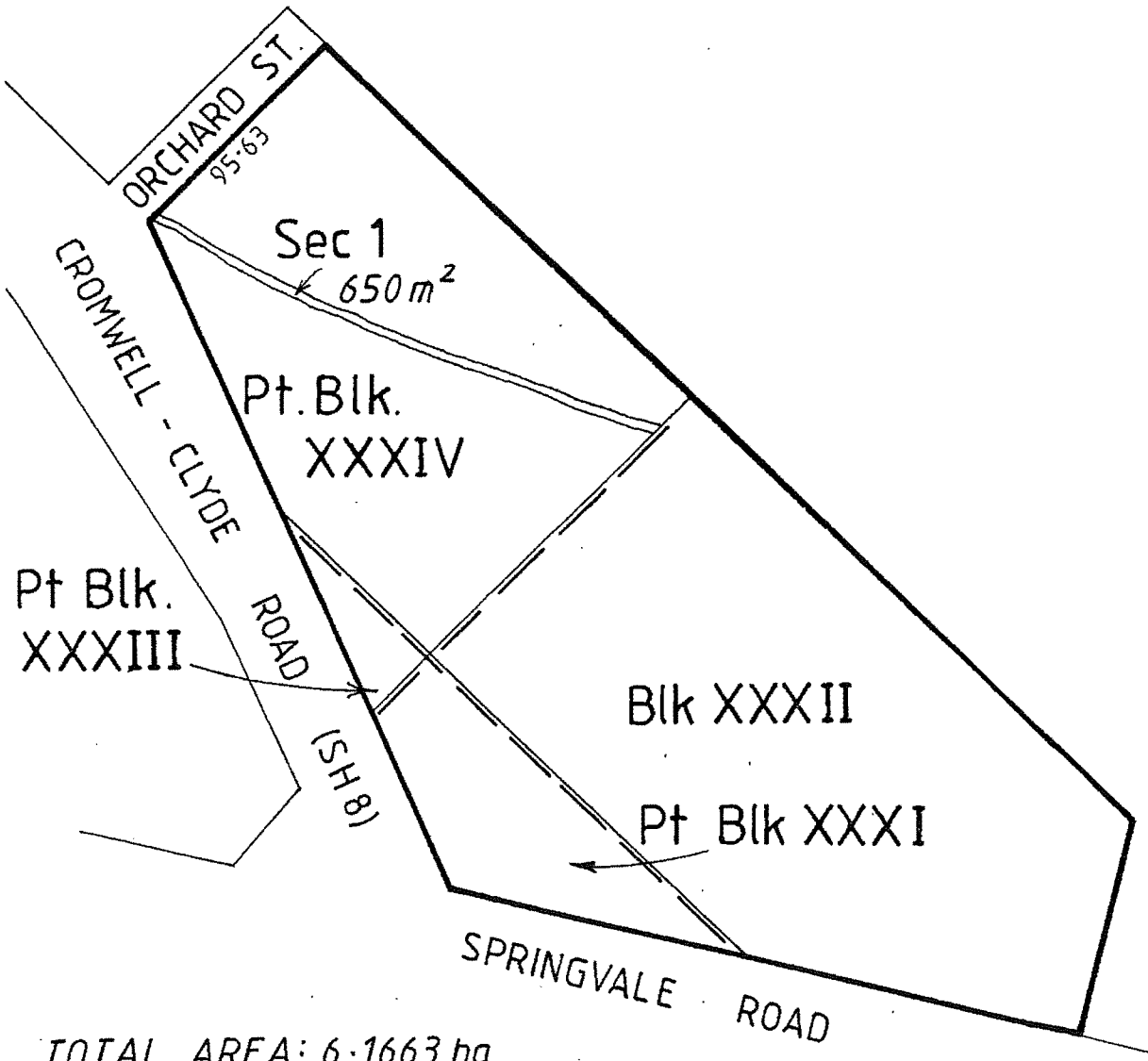
483128 Proclamation defining the middle line of a portion of State Highway (Timaru- Milton) - 15.8.1977 at 9.39 am  
627969 Gazette Notice declaring the part of State Highway No 8 (Timaru-Milton via Cromwell) adjoining the within land  
to be a limited access road - 20.12.1984 at 11.33 am  
Subject to a right to convey water in gross over part Block XXXIV marked as a black line on diagram annexed to Transfer  
885846 to Manuherikia Irrigation Co-operative Society Limited created by said Transfer- 30.6.1995 at 2:16 pm

Title Diagram Diagram

Cpy - 01/01, Pgs - 001, 11/02/03, 09:44



DocID: 110424371



TOTAL AREA: 6.1663 ha





# Title Plan - LT 600773

---

**Survey Number** LT 600773  
**Surveyor Reference** A5202 Hartley Road  
**Surveyor** Elizabeth Sarah Whyte  
**Survey Firm** Paterson Pitts Limited Partnership (Cromwell)  
**Surveyor Declaration** I Elizabeth Sarah Whyte, being a licensed cadastral surveyor, certify that--  
(a) this dataset provided by me and its related survey are accurate, correct and in accordance with the Cadastral Survey Act 2002 and Cadastral Survey Rules 2021; and  
(b) the survey was undertaken by me or under my personal direction.  
Declared on 02 May 2024 11:13 AM

---

## Survey Details

**Dataset Description** LOT 1 BEING SECTION 1 BLOCK XXXIV & PART BLOCK XXXI & BLOCK XXXII & PART BLOCK XXXIII & PART BLOCK XXXIV TOWN OF CLYDE

**Status** Approved as to Survey

**Land District** Otago **Survey Class** Class B

**Submitted Date** 02/05/2024 **Survey Approval Date** 03/05/2024  
**Deposit Date**

---

## Territorial Authorities

Central Otago District

---

## Comprised In

RT 51710 Ltd

---

## Created Parcels

Parcels	Parcel Intent	Area	RT Reference
Area A Deposited Plan 600773	Easement		
Lot 1 Deposited Plan 600773	Fee Simple Title	6.6070 Ha	1170203
<b>Total Area</b>		<u>6.6070 Ha</u>	

---

### LT 600773 Schedule/Memorandum

Land registration district

Otago

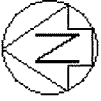
Territorial authority

Central Otago District

#### Schedule of Existing Easements in Gross

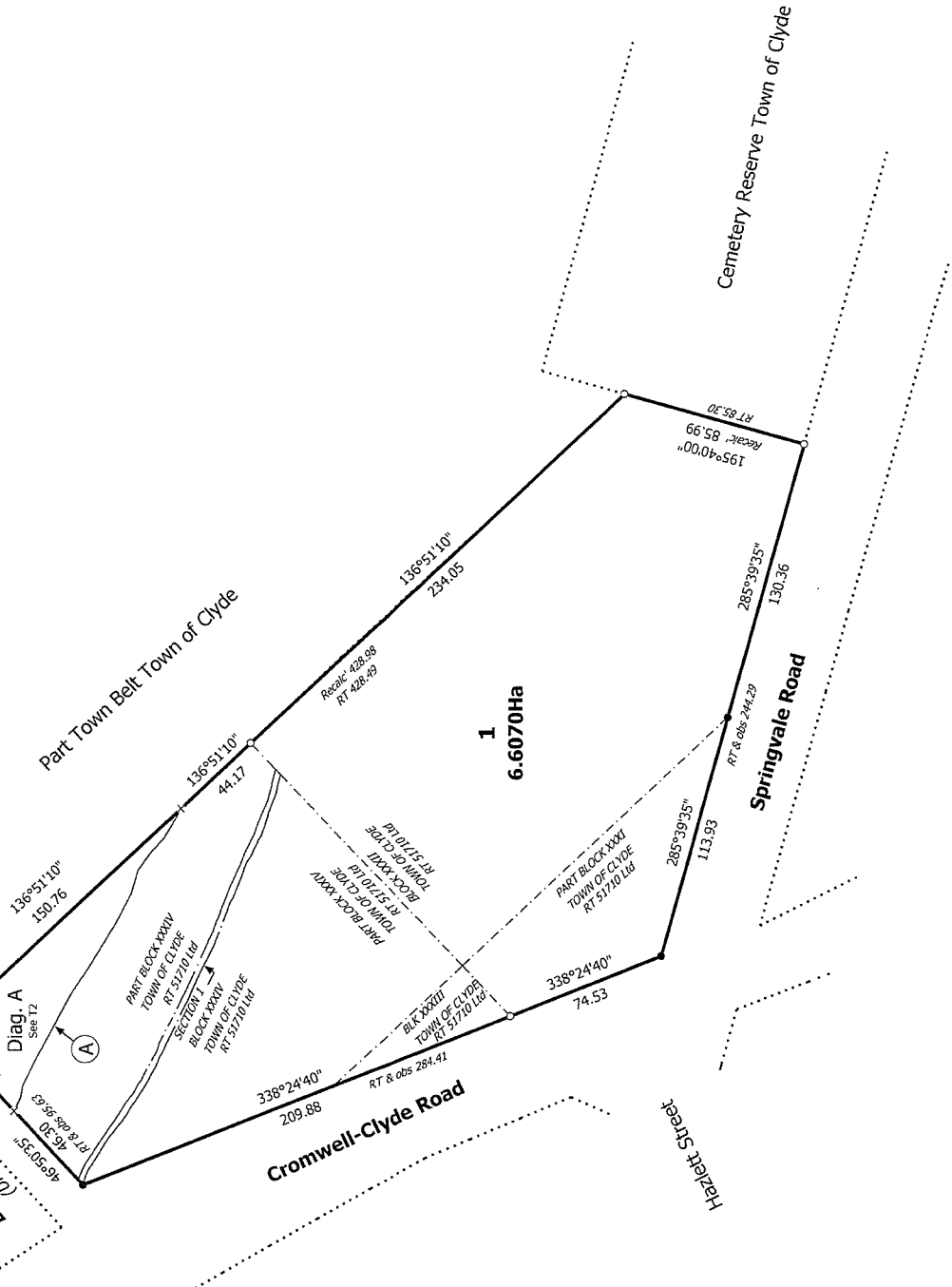
Parcels shown with a prefix of *HL*- include height-limited boundaries

PURPOSE	SHOWN	BURDENED LAND	CREATING DOCUMENT
Right to convey water	A	Lot 1	885846



Part Section 2  
Block LIII TN OF Clyde

Legal Road  
(Mortgaged)



1  
6.6070Ha

NOTE: --- Underlying Primary Parcel

T 1/2

Land District: Otago

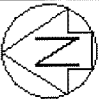
Digitally Generated Plan

Generated on: 03/05/2024 07:07am Page 3 of 4

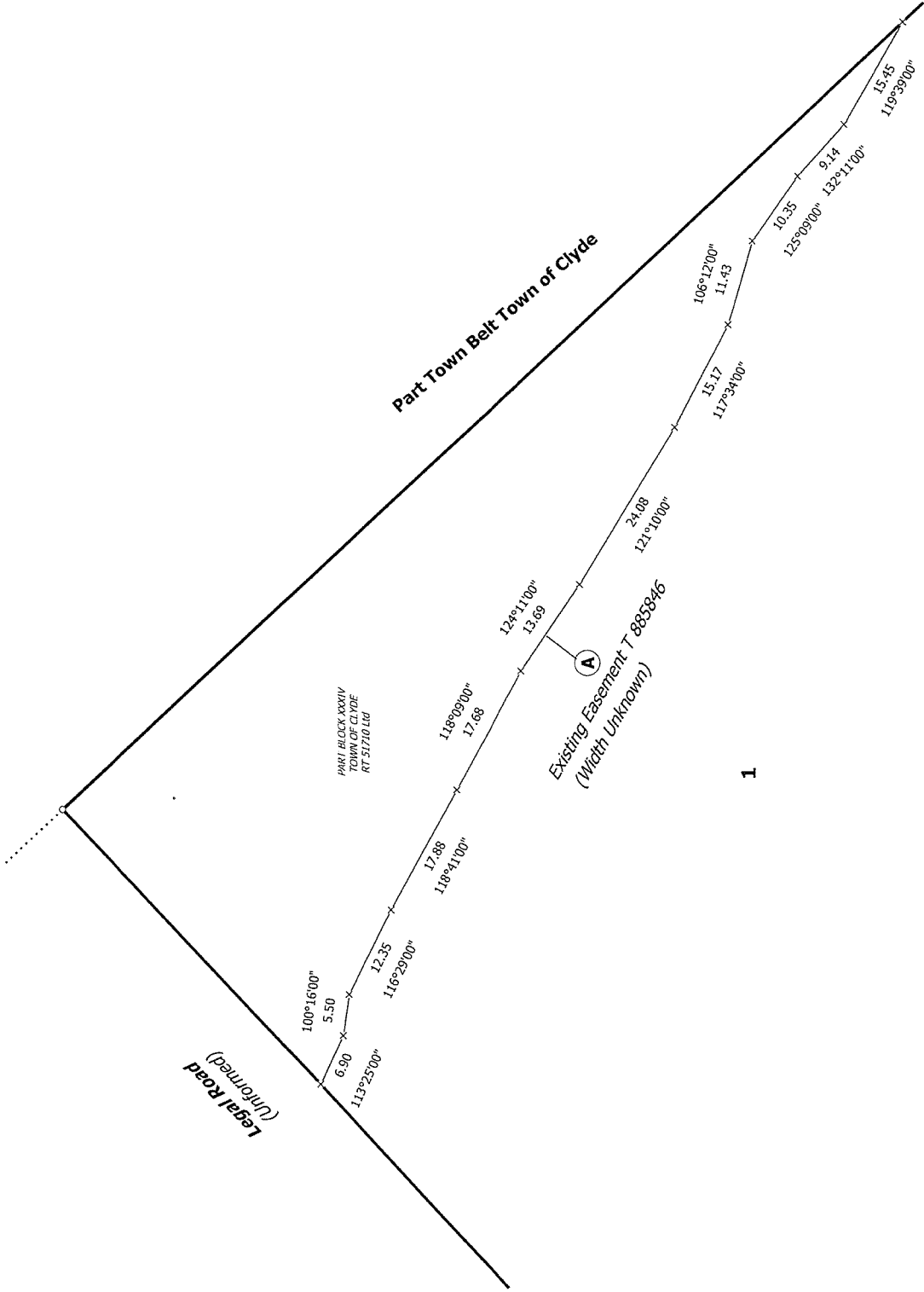
LOT 1 BEING SECTION 1 BLOCK XXXIV & PART BLOCK XXXI & BLOCK XXXII & PART BLOCK XXXIII & PART BLOCK XXXIV TOWN OF CLYDE

Surveyor: Elizabeth Sarah Whyte  
Firm: Paterson Pitts Limited Partnership (C)

Title Plan  
LT 600773  
Approved on: 3/05/2024



Diag. A  
Non Primary



T 2/2

Land District: Otago

Digitally Generated Plan

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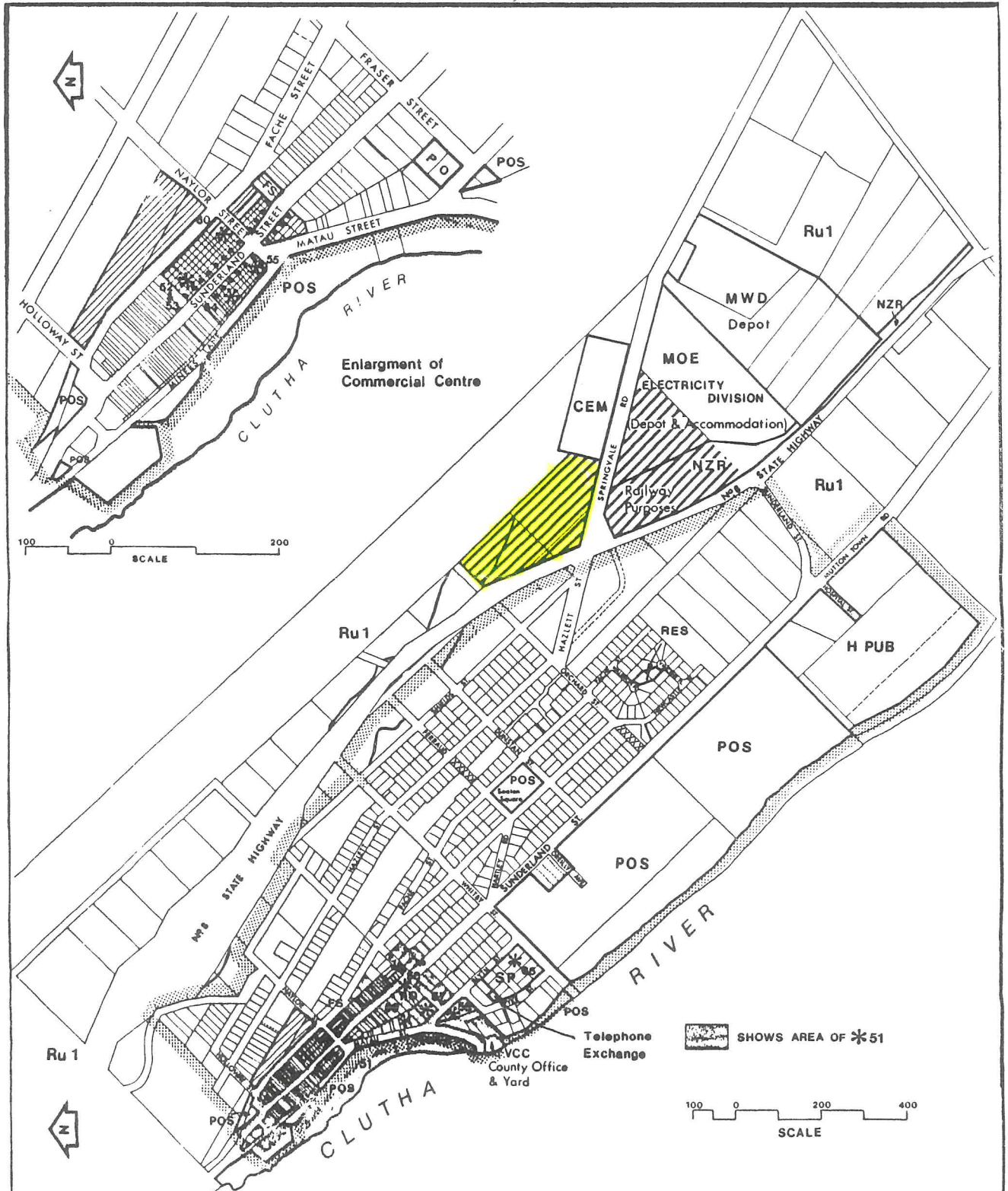
LOT 1 BEING SECTION 1 BLOCK XXXIV & PART BLOCK XXXI & BLOCK XXXII & PART BLOCK XXXIII & PART BLOCK XXXIV TOWN OF CLYDE

Surveyor: Elizabeth Sarah Whyte  
Firm: Paterson Pitts Limited Partnership (C)

Title Plan  
LT 600773  
Approved on: 3/05/2024

## Appendix 'C' - District Plan Maps

Fenner Transitional (Vincent) District Plan.



Clyde

OPERATIVE DATE: 18 December 1987

A

# LEGEND ZONES

	Residential
	Residential Bannockburn
	Residential Lowburn
	Comprehensive Residential Development
	Residential Lakeshore A
	Residential Lakeshore B
	Residential Marina
	Deferred Residential
	Commercial
	Industrial
	Rural 1
	Rural 2 Landscape Protection
	Rural 3 Tourist Service

# DESIGNATED AREAS

	Existing
	Existing

# DESIGNATIONS

BCNZ	Broadcasting Corporation
HFS	High Frequency Station
CBC	Cromwell Borough Council
CEM	Cemetery
DSIR	Department of Scientific & Industrial Research
Au Stn	Auroral Station
FS	Fire Station
GOVT	Government purposes
H PUB	Hospital Public
HR	Historic Reserve
MWD	Ministry of Works & Development
	Railway Purposes
	National Park
NZED	Electricity Department
	Generation of Electricity
NZFS	Forest Service
	State Forest
NZPO	Post Office Purposes
PO	Post Office
TE	Telephone Exchange
POS	Public Open Space
RES	Reserve
REC RES	Recreation Reserve
SC RES	Scenic Reserve
GQ	Gravel Quarry
VCC	Vincent County Council
ABC	Alexandra Borough Council
	Road to be Stopped

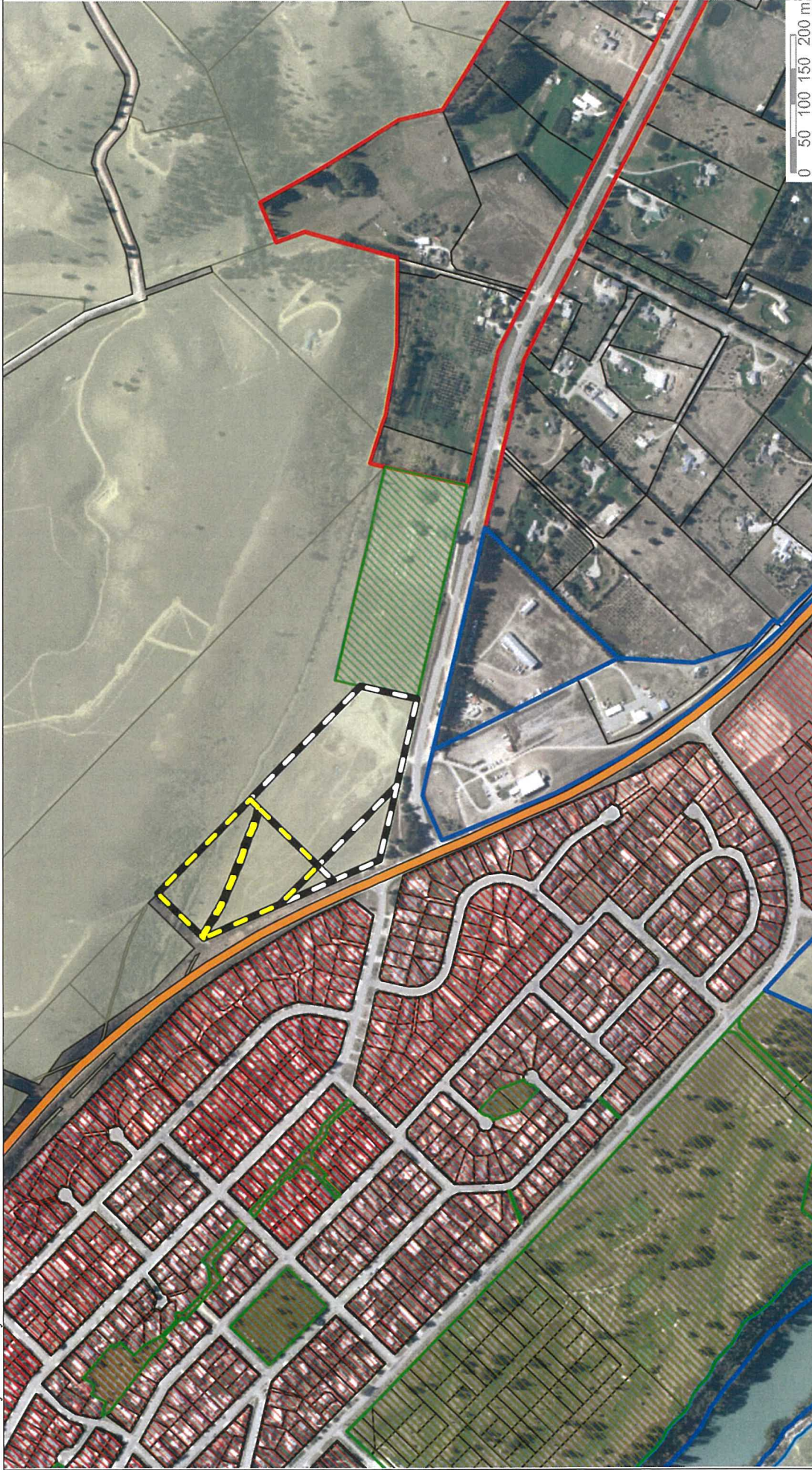
# NOTATIONS

	County/Borough Boundary
	Area Map
	Township Map
	Limited Access Road
	Shopping Street
	Front yard Requirement
	Building Restriction Area
PrOS	Private Open Space
PPL	Protected Private Land
	Wetland Habitat
	Forest Habitat
	Objects and Places of special interest as listed in the Scheme
	High Potential Soils
U.Z.	Underlying Zoning
	Suggested Road Alignment
( )	Anticipated Future Zoning



# Hartley Road Partnership ODP Zoning

Created Date: 28/05/2024  
Created Time: 1:37 PM  
Created By: anonymous



Scale: 1:8000  
Original Sheet Size A4  
Projection: NZTM2000  
Bounds: 1310786.50053715,4988226.71274488  
1313646.34375065,4989810.23921172



The information displayed in the Geographic Information System (GIS) has been taken from Central Otago District Council's (CODC) databases and maps. Digital map data sourced from Land Information New Zealand (LINZ).  
Licensed under the Creative Commons Attribution 4.0 International licence <https://creativecommons.org/licenses/by/4.0/>  
It is made available in good faith but its accuracy or completeness is not guaranteed. CODC accepts no responsibility for incomplete or inaccurate information.  
If the information is relied on in support of a resource consent it should be verified independently.



## Appendix 'D' - Assessment of Environmental Effects

---

REQUEST FOR A CHANGE  
TO THE OPERATIVE  
CENTRAL OTAGO DISTRICT PLAN

Assessment Of  
Environmental Effects

**HARTLEY ROAD PARTNERSHIP**

---

**patersons.co.nz**

**Dunedin**  
PO Box 5933  
Dunedin 9054  
03 477 3245

**Queenstown**  
PO Box 2645  
Wakatipu  
Queenstown 9349  
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**Wānaka**  
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Wānaka 9343

**Cromwell**  
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Cromwell 9342  
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**Alexandra**  
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Alexandra 9340  
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**Oamaru**  
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19 Eden Street  
Oamaru 9400  
03 443 8727

**Christchurch**  
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Tower Junction  
Christchurch 8149  
03 928 1533

## DOCUMENT CONTROL

<b>Project</b>	
<b>Client</b>	Hartley Road Partnership
<b>Project No.</b>	A502
<b>Version</b>	UPDATED
<b>Date of issue</b>	01 October 2024

## AUTHOR(S)

<b>Prepared</b>	Peter Dymock Patersons – Alexandra Office
<b>Reviewed</b>	Duncan White Partner / Senior Planner Patersons – Wanaka Office

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## 1.0 INTRODUCTION

### 1.1 The Requestor

Section 22 of the RMA 91 requires that

- (2) *where environmental effects are anticipated, the request shall describe those effects, taking into account [[clauses 6 and 7]] of Schedule 4, in such detail as corresponds with the scale and significance of the actual or potential environmental effects anticipated from the implementation of the change, policy statement, or plan]*

Schedule (4) provides that the following matters taken into account with any such environmental assessment.

#### **(6) Information required in assessment of environmental effects**

- (1) *An assessment of the activity's effects on the environment must include the following information:*
- a) *If it is likely that the activity will result in any significant adverse effect on the environment, a description of any possible alternative locations or methods for undertaking the activity:*
  - b) *An assessment of the actual or potential effect on the environment of the activity:*
  - c) *If the activity includes the use of hazardous installations, an assessment of any risks to the environment that are likely to arise from such use:*
  - d) *If the activity includes the discharge of any contaminant, a description of –*
    - i. *The nature of the discharge and the sensitivity of the receiving environment to adverse effects; and*
    - ii. *Any possible alternative methods of discharge, including discharge into any other receiving environment:*
  - e) *a description of the mitigation measures (including safeguards and contingency plans where relevant) to be undertaken to help prevent or reduce the actual or potential effect:*
  - f) *identification of the persons affected by the activity, any consultation undertaken, and any response to the views of any person consulted:*
- if the scale and significance of the activity's effects are such that monitoring is required, a description of how and by whom the effects will be monitored if the activity is approved:*

*if the activity will, or is likely to, have adverse effects that are more than minor on the exercise of a protected customary right, a description of possible alternative locations or methods for the exercise of the activity (unless written approval for the activity is given by the protected customary rights group).*

**(7) Matters that must be addressed by assessment of environmental effects**

(1) An assessment of the activity's effects on the environment must address the following matters:

- a) Any effect on those in the neighbourhood and, where relevant, the wider community, including any social, economic, or cultural effects:
- b) Any physical effect on the locality, including any landscape and visual effects:
- c) Any effect on ecosystems, including effects on plants or animals and any physical disturbance of habitats in the vicinity:
- d) Any effect on natural and physical resources having aesthetic, recreational, scientific, historical, spiritual, or cultural value, or other special value, for present or future generations:
- e) Any discharge of contaminants into the environment, including any unreasonable emission of noise, and options for the treatment and disposal of contaminants:
- f) Any risk to the neighbourhood, the wider community, or the environment through natural hazards ... or hazardous installations.

This assessment takes into account the technical reports in **Attachments E to L** of the Request, which form an integral part of the Request.

## 2.0 THE SITE

Emails including a copy of the preliminary concept plan for a subdivision of the site, were sent out on 8 February 2024 to the following owners of immediately adjoining land who are considered to be affected persons, seeking preliminary comments on the Request:

Address	Person/Organisation	Response
Springvale Road, Clyde Cemetery Reserve & Town Belt	Roading, Reserves & Property Departments of CODC	No
SH8	New Zealand Transport Agency	Yes

The response received is attached at **Appendix 1** of this AEE. The New Zealand Transport Agency's (NZTA) comments are addressed in the Integrated Transport Assessment prepared by Carriageway Consultants at **Appendix G** of the Request.

Council's Three Waters Team have indicated that they are not opposed in principal to the project, but that 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 the modelling identifies. Three Waters have advised that specific connections into Council's networks , location of pump stations etc would be matters considered at the time of subdivision. The Infrastructure Report at **Appendix I** shows one possible scenario for these connections , but it is acknowledged that these have not been approved by Three Waters

An application was made to Aukaha via its on-line portal on 8th February 2024, seeking preliminary comment on the Request. Aukaha's response on behalf of Te Rūnanga o Ōtākou and Kāti Huirapa Rūnaka ki Puketeraki is at **Appendix 1** of this AEE. Kā Rūnaka do not have any immediate concerns regarding the proposed re-zoning and advise that a cultural values assessment is not expected to be necessary. With regard to Kā Rūnaka concerns about the disposal of wastewater and stormwater, wastewater will be connected to a reticulated network and there is no reticulated stormwater system to connect to. Stormwater will be treated and disposed of to ground within the site as outlined in the Infrastructure Report at **Appendix I** of the Request. Aukaha and its constituent Kā Rūnaka will also have further opportunity to participate in the plan change Request via the normal notification and hearings process for a private plan change provided for under Schedule 1 of the RMA91.

### 3.0 EFFECTS RELATING TO INDUSTRIAL LAND SUPPLY & GROWTH

An economic assessment of the Request has been prepared by Savvy Consulting and is attached at **Appendix F** of the Request.

In summary, the report finds that the key economic benefits arising from the proposed plan change include:

- *Development of the land and future construction of new buildings will generate value adding to the Central Otago economy , sustaining jobs and household incomes.*
- *Provides a range of additional jobs in the Clyde township and therefore provides opportunities for some current and future residents of Clyde to work close to where they live . Reduced commuting travel compared to the status quo.*
- *Provides a range of industrial services in the Clyde township , improving the accessibility of these services for current and future residents of Clyde ( with reduced road travel time compared to the status quo of travelling to Alexandra (most likely) for those services ). Increased local functional amenity (attractiveness of Clyde as a place to live ).*
- *Increases the self-sufficiency and resilience of the Clyde community while still maintaining economic and social connections with Alexandra (being the higher order urban area).*
- *Potential to attract net additional businesses and investment in the Vincent ward, including net additional households ( business owners and staff) . Flow on benefits for local businesses and service providers.*
- *Supports a competitive industrial land market by introducing a new landowner to the market, and an alternative location to meet demand.*

- *Supports the provision of at least sufficient Industrial Zone capacity in Clyde, the Vincent Ward and district overall to meet projected medium term demand for Industrial Zoned Land.*

The assessment concludes that the anticipated economic benefits of the private plan change will outweigh the potential economic costs. The plan change would positively contribute to the economic wellbeing of the Clyde community and is consistent with strategic planning options being considered by Council.

The request will therefore have positive effects on the environment in relation to urban land supply and population growth.

## 4.0 EFFECTS IN RELATION TO TRANSPORTATION

The effects of the Request on associated transportation issues are addressed in the supporting Transport Assessment at **Appendix G** of the Request. The Assessment concludes as follows:

- *There is an existing shortfall in the intersection geometry because there is no left turning lane from SH8 (north) to Springvale Road ( 7.2.1, 9.3 ).*
- *The crash history at the intersections of SH8 and Springvale & Hartley Roads does not indicate any inherent safety issues at the intersections, but it is plausible that the crash record at the SH8/Springvale Road intersection is influenced by the lack of the required left turning lane (4.3.3, 7.4.1 & 9.5).*
- *There are no impediments to forming a suitable intersection into the site from Springvale Road, the detailed design of which should be confirmed at the resource consent stage (7.2.4, 7.4.2, 7.4.3 & 9.4 ).*
- *No revisions are required to existing carriageway widths of Springvale Road or SH8 as a result of additional traffic generated by development of the site (7.2.3 & 7.2.5).*
- *It is not considered that additional infrastructure is required for pedestrians and cyclists who will be served by the Rail Trail and existing SH 8 underpass. The limited size, industrial purpose and proximity of the subdivision to Clyde means that there will be no need for a public transport service (7.3.1, 7.3.2, 7.3.3, 8.2.3 & 9.4.1 ).*
- *Although there is presently only an indicative plan of subdivision proposed, it is likely that there will be a high degree of compliance with the transportation requirements of the District Plan and at this stage no non-compliances are expected. The plan change is also aligned with overarching strategic documents for the area (8.2, 8.3, 8.4,8.5 ,8.6 & 9.5.1).*
- *Overall, and subject to the preceding comments, the plan change request can be supported from a traffic and transportation perspective and it is considered that there are no traffic and transportation reasons why the plan change could not be approved (9.6).*

Comment: The Request proposes to introduce a new rule in the District Plan that requires the construction of a left turning lane on SH8, prior to any subdivision or development of the site.



## 5.0 EFFECTS IN RELATION TO INFRASTRUCTURE

The supporting infrastructure report at **Appendix I** of the Request addresses stormwater disposal, wastewater, water supply, reticulated utility services and roading construction.

In summary, development facilitated by this Request is able to be serviced for infrastructure and no adverse effects will arise in relation to infrastructural services, subject to suitable downstream capacity at the Alexandra Wastewater Treatment Plant .

## 6.0 EFFECTS IN RELATION TO NATURAL HAZARDS OR HAZARDOUS INSTALLATIONS

A search of the Otago Regional Council’s Natural Hazards Database showed that the Otago Regional Council has no record of any natural hazard affecting the site, including fault lines, liquefaction, flooding, landslides and alluvial fans. The site specific geotechnical analysis by Geosolve at **Appendix J** of the Request concluded the site was suitable for Industrial development, subject to site-specific ground investigations and stormwater assessment, reporting and design during the resource consent and design phases as per para 6 (Recommendations and Considerations) of the report.

None of the test pits excavated for the infrastructure report showed any sign of deleterious material. Any engineered fills will need to be placed, compacted and certified in accordance with NZS4431: 2022. This is addressed at the resource consent/land use consent stage of subsequent subdivision and development of the site.

The proposed Industrial Resource Area zoning of the site does anticipate that some activities could establish on the site that may involve the use of hazardous materials or hazardous installations. This is managed under Objectives 9.1.1 and 9.1.2 Policies 9.2.3 and 17.4.5 and Rule 9.3.4 of the ODP. The Regional Policy Statements and Regional Plans: Waste & Water also include objectives, policies and rules controlling the use of hazardous materials and installations.

## 7.0 EFFECTS IN RELATION TO SOIL CONTAMINATION

The Preliminary Site Investigation (PSI) prepared by Insight Engineering at **Appendix H** of the Request addresses this issue.

The report concluded (para 7) that, “ ....it is considered highly unlikely that there will be a risk to human health if the Zone was changed to industrial/commercial”. It also recommended (para 8 ) that “.....soil disturbance of the site does not meet the criteria to require Consent under Rule 5.6.1 of the Regional Plan Waste”.

## 8.0 EFFECTS ON CULTURAL VALUES & OTHER SPECIAL VALUES

So far as the Requestors are aware, the site does not contain any special ecosystems, natural habitats, or sites of recreational, cultural or scientific value. Aukaha have advised that there are

no recorded Maori archaeological sites or sites of cultural significance in the immediate area and that a cultural values assessment is not considered to be necessary. The Clutha River/ Mata- Au is subject to a statutory recognition under the Ngai Tahu Claims Settlement Act 1998. However the river is remote from the site and there is no overland flow path from the site to the river.

A pre-1900 water-race traverses the upper slopes of the site. However it is located outside the boundary of the Request and remains in the Rural Resource Area .

Possible disturbance of unknown cultural remains is best covered at the subsequent resource consent stage of developing the site by conditions of resource consent imposing an accidental discovery protocol. Possible disturbance of unknown archaeological sites by earthworks is governed by the requirements of the Heritage NZ Pouhere Taonga Act (2014).

Although the site is adjacent to the Clyde Cemetery Reserve, the actual walled cemetery is some considerable distance from the site. The proposed landscape screening will further insulate and screen the cemetery reserve from industrial activity within the site. It is also noted that Council has recently re-zoned former rural land owned by itself to industrial, immediately adjacent to the Cromwell Cemetery with no provision for screening.

## 9.0 DISCHARGE OF CONTAMINATES AND UNREASONABLE EMISSION OF NOISE

Wastewater will be discharged to the Council reticulation and stormwater direct to land within the site. Noise emission is governed by existing District Plan Rules 9.3.6 (iii) and 12.7.4.

## 10.0 LANDSCAPE VALUES

The land subject to this Request is in an “Other Rural Landscape” (ORL), the third tier landscape classification in the District Plan, being less sensitive than an Outstanding Natural Landscape (ONL) or a Significant Amenity Landscape (SAL).

A landscape assessment at **Appendix K** by Mike Moore, landscape architect, has been prepared in support of the Request. In summary the assessment finds that:

- The site is largely flat and has no landscape, natural character or rural amenity values of any special significance and that rural character in this area is already modified by its peri-urban location.
- Mitigation measures, including a landscape buffer and protection of the terrace riser within the site above the historic water race are required to soften and screen views of the site and to maintain the landform coherence of the terrace riser within the SAL above the site.
- Comment: The Request includes suitable additions to the rules of the ODP that incorporate a landscape buffer . The terrace riser and historic water race are

protected by remaining in the Rural Resource Area, subject to objectives, policies and rules in Part 4 of the ODP that will address protection of historic features and significant landscapes on any subdivision of the site .

- The adverse physical effects on landscape values are assessed as low/moderate (minor) in degree and can be adequately mitigated by the proposed rules.
- The site is screened by the SH8 embankment from most of the residential area of Clyde.
- The State Highway and moving traffic on it already reduce amenity from the few properties near the Hazlett Street/SH8 intersection that have a view of the site through varying extents of existing screening and that once the proposed landscaped buffer plantings mature, any adverse amenity effects will be further screened and softened.
- Overall the sensitivity of the site to the proposed change is low.
- The zone change is generally consistent with the statutory provisions relating to landscape values and effects.

The attached plan at **Appendix 2** of this AEE illustrates one possible option for the ultimate development of the site.

As illustrated by this plan, the inevitable result of the re-zoning of the site will be a change from a predominately open aspect to that of an built-up industrial character. Landscape effects cannot therefore be avoided, but they are not necessarily adverse and are compatible with the surrounding environment. Landscape change is inevitable if suitable industrial development land is to be made available to provide for the future growth of Clyde and the District as a whole.

It is concluded that the positive effects of this proposal in providing for the future growth of Clyde in a matter that satisfies the demand for industrial development not provided for in the current District Plan outweigh any minor adverse effects on landscape values.

## 11.0 EFFECTS IN RELATION TO THE LAND RESOURCE

Part of the site is identified on Landcare Research’s land use capability database as being LUC 3 and the site is therefore subject to the National Policy Statement on Highly Productive Land (NPS-HPL) .

The NPS-HPL is addressed in the Land Productivity Report at **Appendix L** of the Request. The report concludes that “although the topography of a large part of the site and the site’s climate and soils make it suitable for highly productive use, the lack of an irrigation and frost fighting water supply means that its productive potential cannot be realised. Potential reverse sensitivity issues with the adjacent Clyde Township, including a hospital and retirement village, further inhibit realisation of the site’s productive potential.”

The report also concludes that *“the Request complies with all of the exception criteria in the NPS-HPL that enables Council to rezone a site of highly productive land for non-rural use.”*

Part 4 of the Economic Assessment at **Appendix F** of the Request also considers clause 3.6 (4) of the NPS-HPL and concludes that the economic benefits of rezoning outweigh the economic costs of foregoing land-based primary production, in particular because the use of the site for highly productive land-based activity cannot be realised because of the lack of a supply of irrigation water.

## 12.0 EFFECTS ON ADJOINING PROPERTIES AND REVERSE SENSITIVITY EFFECTS ON SH8

The site is remote from any land currently used for highly productive rural use, therefore reverse sensitivity with rural land is highly unlikely to be an issue. The site is well separated from the residential areas of Clyde by a wide state highway corridor.

The state highway carriageway adjacent to the site is on an elevated fill embankment up to 8m high that provides for very effective visual screening of the site from the Clyde residential area and this screening will be further enhanced by the proposed landscape amenity strip. Adjoining land on the other side of Springvale Road is used for industrial purposes (storage shed and yard) and the terminus of the Central Otago Rail Trail. Industrial use of the site is completely compatible with these activities. Land bordering the site to the north and east is bare, dryland, unoccupied and un-farmed pasture and likely to remain so for the foreseeable future. Industrial use of the site will have no adverse effect on this land. The Request also provides for the ongoing protection of the terrace riser within the site above and including the historic water-race by retaining it in the Rural Resource Area .

NZTA requires residential dwellings located within 100m of the edge line of a State Highway to have provision for additional sound proofing insulation. Given the industrial use proposed for the site, it is not considered that this is required to be specifically provided for as part of this Request. Existing standard 9.3.6 (iii) (b) of the ODP already provides for an insulation requirement for noise sensitive activities that locate anywhere within the Industrial Resource Area . A breach of this standard is a restricted discretionary activity under Rule 9.3.3 with one of the matters that Council has restricted the exercise of its discretion being *“The effect on the safe and efficient operation of the roading network”*. The proposed landscape screening also provides an additional buffer from reverse sensitivity effects from the highway.

## 13.0 CONCLUSION

In summary, the Request will have no significant adverse effects on the environment. Any adverse effects are less than minor, have been recognised and their avoidance or mitigation has been provided for in the Request.

It would be difficult to find a more suitable site for industrial activity in the vicinity of the Clyde Township.

The net effects of the Request are, on balance, overwhelmingly positive.

## Appendix '1' - Response to Consultation



## Peter Dymock

---

**From:** Cailin Richardson Hall <Cailin.RichardsonHall@nzta.govt.nz>  
**Sent:** Wednesday, 28 February 2024 10:35 am  
**To:** Peter Dymock  
**Cc:** Andy Carr; Andy Carr; Andy Carr; Andy Carr; Andy Carr; Central Otago District Council; Duncan White; Duncan White; leon@benchmarkconstruction.co.nz  
**Subject:** RE: Springvale Rd & SH 8, Clyde - Application-2024-0140 CRM:0304000277

Kia ora Peter,

Thank you for your patience whilst I sought feedback from NZTA subject matter experts regarding the proposed plan change. I have now received preliminary feedback based on the information provided to be considered when putting together the application and ITA for the proposal:

- The State highway in the vicinity of the site is declared a Limited Access Road to ensure the efficiency and functionality is maintained.
- Depending on the data provided in the ITA such as the traffic generation, improvements may be required at the intersection. For example, decreasing shoulder to incorporate a left turn lane into Springvale Road.
- Should improvements of the intersection for Springvale Rd and SH8 be required, the design, review and construction requirements will be outlined based on the level of improvements that are required. This could include (but not limited to):
  - Development of a robust pavement design for any pavement widenings undertaken and/or reviewed by a suitably qualified engineer with experience in state highway road design.
  - Consideration for movement of stormwater eg. all stormwater will be managed within the property.
  - If construction is required, a suitable contractor who is pre-approved to work on the state highways shall provide ITP's to support construction and CAR shall be submitted and approved prior to any works being undertaken on or near the state highway.
- Clyde Township is situated on the south side of SH8 whilst the proposed site is on the northern side. This would generate cross highway movements and therefore consideration of this should also be included in the ITA.
- NZTA also suggests any Section 32 analysis needs to show the need for additional Industrial land.

Please let me know if you have any further questions.

Ngā mihi,

### Cailin Richardson Hall

Planner – Environmental Planning (South)

Poutiaki Taiao | Environmental Planning

Email: [Cailin.RichardsonHall@nzta.govt.nz](mailto:Cailin.RichardsonHall@nzta.govt.nz)

Phone: 03 741 4706

Mobile: 021 241 0235

**Waka Kotahi** NZ Transport Agency

Christchurch, Level 1, BNZ Centre, 120 Hereford Street

PO Box 1479, Christchurch 8011, New Zealand

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[www.nzta.govt.nz](http://www.nzta.govt.nz)

----- Original Message -----

**From:** Peter Dymock <peter.dymock@ppgroup.co.nz>;

**Received:** Fri Feb 09 2024 09:57:38 GMT+1300 (New Zealand Daylight Time)

**To:** Cailin Richardson Hall <cailin.richardsonhall@nzta.govt.nz>;

**Cc:** Andy Carr <andy.carr@carriageway.co.nz>; Andy Carr <andy.carr@carriageway.co.nz>; Andy Carr <andy.carr@carriageway.co.nz>; Andy Carr <andy.carr@carriageway.co.nz>; Andy Carr <andy.carr@carriageway.co.nz>;

Andy Carr <andy.carr@carriageway.co.nz>; Central Otago District Council <andy.carr@carriageway.co.nz>; Duncan



Aukaha ref: J005586

10 June 2024

Attention: Peter Dymock  
Email: [peter.dymock@patersons.co.nz](mailto:peter.dymock@patersons.co.nz)

Tēnā koe Peter,

**Re: Hartley Road Partnership Private Plan Change**

Te Rūnanga o Ōtākou and Kāti Huirapa Rūnaka ki Puketeraki (Kā Rūnaka) understand that Hartley Road Partnership intends to lodge a private plan change request to the Central Otago District Council (CODC) to rezone a site from rural to industrial, at the intersection of SH8 and Springvale Road in Clyde, and is seeking initial feedback from Kā Rūnaka.

Aukaha writes this letter on behalf of Te Rūnanga o Ōtākou and Kāti Huirapa Rūnaka ki Puketeraki. Kā Rūnaka exercise rakatirataka and kaitiakitaka over all the natural resources within their takiwā which the proposed site sits within.

Kā Rūnaka do not have any immediate concerns regarding the proposed rezoning based on the information provided to date. There are no recorded Māori archaeological sites or sites of significance in the immediate area affected by the proposed rezoning, therefore, a cultural values assessment is not expected to be necessary for this proposal. However, Kā Rūnaka have ongoing concerns about how wastewater and stormwater is managed within their takiwā and it is their strong preference that any development is connected to a reticulated wastewater and stormwater network. If there is no reticulated stormwater network available, the preference is that soft (nature-based) solutions are used to attenuate and treat stormwater run-off.

This letter is specific to the above proposal and Kā Rūnaka would like to be kept informed as more information becomes available and as this plan change request progresses through the council process.

Nāku noa, nā

Dr Kate Timms-Dean  
**General Manager, Mana Taiao**

cc: Te Rūnanga o Ōtākou  
Kāti Huirapa Rūnaka ki Puketeraki

## Peter Dymock

---

**From:** Peter Dymock  
**Sent:** Wednesday, 5 June 2024 10:42 am  
**To:** Yvonne Takau  
**Cc:** Duncan White; leon@benchmarkconstruction.co.nz  
**Subject:** RE: Hartley Road Partnership private plan change CODC  
**Attachments:** 05062024102233.pdf; Clyde Industrial PC - Economic Assessment Final.pdf

Hi Yvonne

1. At this stage it is just a plan change Request and there is no indication of the likely future tenants or types of activities that may occur within the site .
2. However what is proposed is to simply re-zone the site “Industrial “ under the existing provisions of the Operative Central Otago District Plan (ODP) for the Industrial Resource Area .
3. There is no intention to request a “bespoke” zone for the site .
4. For your information , I attach the relevant policies , objectives & rules of the ODP for the Industrial Resource Area
5. You will see that the ODP allows virtually unlimited commercial & industrial activities to establish within the Industrial Resource Area as a permitted activity ( no resource consent required) , with some minor restrictions on retail and residential activity
6. As for the reasons and justification for the plan change , the attached economic assessment provides the background to this . This assessment will be included in the formal Request to Council .
7. We hope to lodge the Request within a couple of weeks , so any response from Aukaha would be greatly appreciated by then

Regards

**Peter Dymock**  
Senior Planner

0274 377 910 | peter.dymock@patersons.co.nz | patersons.co.nz

**Alexandra Office**  
03 448 8775  
6-8 Skird Street  
Alexandra 9320



**patersons.**  
Land Professionals

Please consider the environment before printing this email.

**From:** Yvonne Takau <yvonne@aukaha.co.nz>  
**Sent:** Wednesday, June 5, 2024 10:04 AM  
**To:** Peter Dymock <Peter.Dymock@patersons.co.nz>  
**Subject:** Hartley Road Partnership private plan change CODC

Kia ora Peter

I'm just getting in touch about the proposed private plan change you had put information through for initial comment from manawhenua.



I sent out the information you put through below and a question has come back wondering if there's any further information about potential tenants or the types of activities that would occur. Is there any further information that you can share at this stage?

Kā mihi,



**Yvonne Takau**

Planner

Level 2, 266 Hanover Street, Dunedin 9016 | PO Box 446, Dunedin 9054

**Waea:** 03 777 3455

**Tari:** 03 477 0071

[www.aukaha.co.nz](http://www.aukaha.co.nz)



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**From:** Aukaha Website <[aukaha@weave.co.nz](mailto:aukaha@weave.co.nz)>

**Sent:** Thursday, February 8, 2024 11:13 AM

**To:** Aukaha Consents <[consents@aukaha.co.nz](mailto:consents@aukaha.co.nz)>

**Subject:** [EXT] New Consent Application

**Who is this Consent Application for:**

A Company, Partnership or Sole Trader

**Applicant Details - Companies / Partnerships / Sole Traders**

**Company type**

Partnership

**Full Legal Entity Name**

Hartley Road Partnership c/- Leon van Boxel

**Physical Address**

1 Jennings Way  
RD1  
Alexandra 9320  
New Zealand  
[Map It](#)

**Use same address for Postal Address**

- Yes

**Postal Address**

1 Jennings Way  
RD1  
Alexandra 9320  
New Zealand  
[Map It](#)

**Company Details - Email**

[leon@benchmarkconstruction.co.nz](mailto:leon@benchmarkconstruction.co.nz)

**Phone**

03 4451826

**Mobile**

0274 509 253

**Will you be using an Authorised Agency / Consultant**

- Yes

**Applicant(s) Authorised Agent / Consultant****Authorised Agent - Name**

Paterson Pitts Limited Partnership c/- Peter Dymock

**Authorised Agent - Address**

8 Skird Street  
Alexandra 9320  
New Zealand  
[Map It](#)

**Authorised Agent - Email**

[peter.dymock@ppgroup.co.nz](mailto:peter.dymock@ppgroup.co.nz)

**Authorised Agent - Key Contact Person**

- YES This is a Key Contact Person

**Authorised Agent - cc into communications**

- YES please cc. into communications

**Proposed Activity****Proposed Activity**

1. Paterson Pitts Limited Partnership act for the Hartley Road Partnership ( HRP)
2. HRP propose to lodge a private plan change request to the Central Otago District Council (CODC) to re-zone its site adjacent to SH8 & Springvale Road Clyde from "Rural" to "Industrial"
3. The attached outline development plan (ODP) gives an indication of the form of development that could eventuate on the site .
4. The development will be connected to the new Clyde-Alexandra water & wastewater scheme reticulations
5. It is intended to lodge the request within about 3 months
6. This is a preliminary "heads up " consultation . Any preliminary comments or advice on the proposal by Aukaha would be appreciated .
7. This is not a request for formal affected party approval
8. Aukaha will of course have the opportunity to formally submit on the proposal , once it is publicly notified by CODC

**Attach any relevant documentation to support your application**

- [A5202\\_PLAN\\_1A.pdf](#)

**Billing Information****Billing - Legal Entity Name**

Hartley Road Partnership

**Billing - Contact Name**

Leon van Boxtel

**Billing - Email**

[leon@benchmarkconstruction.co.nz](mailto:leon@benchmarkconstruction.co.nz)

**Billing - Phone**

0274 509 253

**Send billing email copy of this application**

- Send this billing email a copy of this application

**Acceptance**

**Standard Terms of Engagement**

- I agree to the [Terms of Engagement](#)

**Signature**

**Acceptance - Name**

Peter Dymock

**Acceptance - Position**

Consultant for the Hartley Road Partnership

**Acceptance - Date**

08/02/2024

▪



## Peter Dymock

---

**From:** Peter Dymock  
**Sent:** Monday, 4 March 2024 5:01 pm  
**To:** Michael Bathgate; leon@benchmarkconstruction.co.nz; Duncan White  
**Subject:** RE: Hartley Road Partnership

Hi Michael

1. At this stage there is no more detail , other than the plan provided which is only an illustration of the pattern of subdivision that could well result from the re-zoning of the site from Rural to Industrial . It is not a structure plan or a proposed plan of subdivision for a resource consent application
2. The type of development on these lots can be gauged from CODC's District Plan provisions for the Industrial Resource Area ( zone) which is available on Council's website. The zoning provisions are very enabling and provide for a wide range of Industrial / Commercial/Retail /Residential development as a permitted activity , with retail & residential uses subject to some forms of restriction .
3. It is not proposed to alter the objectives and policies of the plan for the Industrial Resource Area . Some very minor changes to the rules will be proposed to deal with site specific matters , principally access from SH8 & Springvale Road .
4. Specialist reports have been commissioned dealing with demand analysis/economics , hazards/land contamination , Geotech , traffic engineering & infrastructure . Only the Geotech and contamination reports are to hand , neither of which identified any significant issues .
5. There has been a preliminary meeting with Council planning and infrastructure staff and no insurmountable issues were raised . Waka Kotahi/ NZTA have also been consulted - likewise it did not identify any insurmountable issues.
6. Liaison with runaka ( sorry , can't figure out how to do macrons in outlook ) and advice of any issues would be appreciated. Please also advise if you think a cultural impact report is required .
7. Happy to zoom if you think it necessary

Regards

### **Peter Dymock.**

Senior Planner

**M** 027 437 7910

**E** [peter.dymock@ppgroup.co.nz](mailto:peter.dymock@ppgroup.co.nz)

Paterson Pitts Limited Partnership, trading as:

**PATERSONPITTSGROUP**

**Surveying • Planning • Engineering**

**Your Land Professionals**

Alexandra Office:

6 Skird Street, Alexandra

or P.O. Box 103, Alexandra 9340, New Zealand

**T** 03 4488775

**W** [www.ppgroup.co.nz](http://www.ppgroup.co.nz)

**From:** Michael Bathgate <michael@aukaha.co.nz>  
**Sent:** Monday, March 4, 2024 4:29 PM  
**To:** Peter Dymock <Peter.Dymock@ppgroup.co.nz>  
**Subject:** Hartley Road Partnership

Kia ora Peter

Just responding to this notice of the potential private plan change request at Springvale Road/SH8. Thanks for lodging this - I was away for all of February, hence not responding sooner.

I can make rūnaka aware of this proposal/try and gauge whether there's any issues. Is there any more detailed info on the proposal other than the scheme plan, or do you think we should have a zoom to discuss?

Kā mihi,



**Michael Bathgate**

Senior Planner

Level 2, 266 Hanover Street, Dunedin 9016 | PO Box 446, Dunedin 9054

**Waea:** 03 474 2761

**Waea Pūkoro:** 021 572 421

**Tari:** 03 477 0071

[www.aukaha.co.nz](http://www.aukaha.co.nz)



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**From:** Aukaha Website <[aukaha@weave.co.nz](mailto:aukaha@weave.co.nz)>

**Sent:** Thursday, February 8, 2024 11:13 AM

**To:** Aukaha Consents <[consents@aukaha.co.nz](mailto:consents@aukaha.co.nz)>

**Subject:** [EXT] New Consent Application

**Who is this Consent Application for:**

A Company, Partnership or Sole Trader

**Applicant Details - Companies / Partnerships / Sole Traders**

**Company type**

Partnership

**Full Legal Entity Name**

Hartley Road Partnership c/- Leon van Bortel

**Physical Address**

1 Jennings Way  
RD1  
Alexandra 9320  
New Zealand  
[Map It](#)

**Use same address for Postal Address**

- Yes

**Postal Address**

1 Jennings Way  
RD1  
Alexandra 9320  
New Zealand  
[Map It](#)

**Company Details - Email**

[leon@benchmarkconstruction.co.nz](mailto:leon@benchmarkconstruction.co.nz)

**Phone**

03 4451826

**Mobile**

0274 509 253

**Will you be using an Authorised Agency / Consultant**

- Yes

**Applicant(s) Authorised Agent / Consultant**

**Authorised Agent - Name**

Paterson Pitts Limited Partnership c/- Peter Dymock

**Authorised Agent - Address**

8 Skird Street  
Alexandra 9320  
New Zealand  
[Map It](#)

**Authorised Agent - Email**

[peter.dymock@ppgroup.co.nz](mailto:peter.dymock@ppgroup.co.nz)

**Authorised Agent - Key Contact Person**

- YES This is a Key Contact Person

**Authorised Agent - cc into communications**

- YES please cc. into communications

**Proposed Activity**

**Proposed Activity**

1. Paterson Pitts Limited Partnership act for the Hartley Road Partnership ( HRP)
2. HRP propose to lodge a private plan change request to the Central Otago District Council (CODC) to re-zone its site adjacent to SH8 & Springvale Road Clyde from "Rural" to "Industrial"
3. The attached outline development plan (ODP) gives an indication of the form of development that could eventuate on the site .
4. The development will be connected to the new Clyde-Alexandra water & wastewater scheme reticulations
5. It is intended to lodge the request within about 3 months
6. This is a preliminary "heads up " consultation . Any preliminary comments or advice on the proposal by Aukaha would be appreciated .
7. This is not a request for formal affected party approval
8. Aukaha will of course have the opportunity to formally submit on the proposal , once it is publicly notified by CODC

**Attach any relevant documentation to support your application**

- [A5202 PLAN 1A.pdf](#)

**Billing Information**

**Billing - Legal Entity Name**

Hartley Road Partnership

**Billing - Contact Name**

Leon van Boxtel

**Billing - Email**

[leon@benchmarkconstruction.co.nz](mailto:leon@benchmarkconstruction.co.nz)

**Billing - Phone**

0274 509 253

**Send billing email copy of this application**

- Send this billing email a copy of this application

**Acceptance**

**Standard Terms of Engagement**

- I agree to the [Terms of Engagement](#)

**Signature**



**Acceptance - Name**

Peter Dymock

**Acceptance - Position**

Consultant for the Hartley Road Partnership

**Acceptance - Date**

08/02/2024



## Peter Dymock

---

**From:** Cailin Richardson Hall <Cailin.RichardsonHall@nzta.govt.nz>  
**Sent:** Wednesday, 28 February 2024 10:35 am  
**To:** Peter Dymock  
**Cc:** Andy Carr; Andy Carr; Andy Carr; Andy Carr; Andy Carr; Central Otago District Council; Duncan White; Duncan White; leon@benchmarkconstruction.co.nz  
**Subject:** RE: Springvale Rd & SH 8, Clyde - Application-2024-0140 CRM:0304000277

Kia ora Peter,

Thank you for your patience whilst I sought feedback from NZTA subject matter experts regarding the proposed plan change. I have now received preliminary feedback based on the information provided to be considered when putting together the application and ITA for the proposal:

- The State highway in the vicinity of the site is declared a Limited Access Road to ensure the efficiency and functionality is maintained.
- Depending on the data provided in the ITA such as the traffic generation, improvements may be required at the intersection. For example, decreasing shoulder to incorporate a left turn lane into Springvale Road.
- Should improvements of the intersection for Springvale Rd and SH8 be required, the design, review and construction requirements will be outlined based on the level of improvements that are required. This could include (but not limited to):
  - Development of a robust pavement design for any pavement widenings undertaken and/or reviewed by a suitably qualified engineer with experience in state highway road design.
  - Consideration for movement of stormwater eg. all stormwater will be managed within the property.
  - If construction is required, a suitable contractor who is pre-approved to work on the state highways shall provide ITP's to support construction and CAR shall be submitted and approved prior to any works being undertaken on or near the state highway.
- Clyde Township is situated on the south side of SH8 whilst the proposed site is on the northern side. This would generate cross highway movements and therefore consideration of this should also be included in the ITA.
- NZTA also suggests any Section 32 analysis needs to show the need for additional Industrial land.

Please let me know if you have any further questions.

Ngā mihi,

### Cailin Richardson Hall

**Planner – Environmental Planning (South)**

Poutiaki Taiao | Environmental Planning

Email: [Cailin.RichardsonHall@nzta.govt.nz](mailto:Cailin.RichardsonHall@nzta.govt.nz)

Phone: 03 741 4706

Mobile: 021 241 0235

**Waka Kotahi** NZ Transport Agency

Christchurch, Level 1, BNZ Centre, 120 Hereford Street

PO Box 1479, Christchurch 8011, New Zealand

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----- Original Message -----

**From:** Peter Dymock <peter.dymock@ppgroup.co.nz>;

**Received:** Fri Feb 09 2024 09:57:38 GMT+1300 (New Zealand Daylight Time)

**To:** Cailin Richardson Hall <cailin.richardsonhall@nzta.govt.nz>;

**Cc:** Andy Carr <andy.carr@carriageway.co.nz>; Andy Carr <andy.carr@carriageway.co.nz>; Andy Carr <andy.carr@carriageway.co.nz>; Andy Carr <andy.carr@carriageway.co.nz>; Andy Carr <andy.carr@carriageway.co.nz>;

<andy.carr@carriageway.co.nz>; Central Otago District Council <andy.carr@carriageway.co.nz>; Duncan

White <duncan.white@ppgroup.co.nz>; Duncan White <duncan.white@ppgroup.co.nz>;  
leon@benchmarkconstruction.co.nz;  
**Subject:** RE: Springvale Rd & SH 8, Clyde - Application-2024-0140 CRM:0304000277

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Hi Cailin

Thanks for that .

At this stage we are only requesting preliminary comment , which will be included in the Request and will also inform the ITA

Could you please also send your comments to Andy Carr of Carriageway Consulting who has been copied into this email . He may subsequently liaise directly with you over his ITA .

The final ITA will be included in the Request as publicly notified.

Regards

**Peter Dymock**

Senior Planner

**M 027 437 7910**

**E** [peter.dymock@ppgroup.co.nz](mailto:peter.dymock@ppgroup.co.nz)

Paterson Pitts Limited Partnership, trading as:

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Alexandra Office:

6 Skird Street, Alexandra

or P.O. Box 103, Alexandra 9340, New Zealand

**T 03 4488775**

**W** [www.ppgroup.co.nz](http://www.ppgroup.co.nz)

**From:** Cailin Richardson Hall <Cailin.RichardsonHall@nzta.govt.nz>

**Sent:** Friday, February 9, 2024 9:41 AM

**To:** Peter Dymock <Peter.Dymock@ppgroup.co.nz>

**Subject:** Springvale Rd & SH 8, Clyde - Application-2024-0140 CRM:0304000277

Hi Peter,

Thanks for getting in touch with NZTA Waka Kotahi regarding the proposed plan change. I have been assigned to process it.

I will send off the proposal off for comments from our safety and network team and once I hear back, I'll be in touch. Once the ITA has been prepared, could you please also send this through to help us assess the application.

Please let me know if you have any questions in the meantime.

Ngā mihi,

**Cailin Richardson Hall**

**Planner – Environmental Planning (South)**

Poutiaki Taiao | Environmental Planning

Email: [Cailin.RichardsonHall@nzta.govt.nz](mailto:Cailin.RichardsonHall@nzta.govt.nz)



Phone: 03 741 4706  
Mobile: 021 241 0235

**Waka Kotahi NZ Transport Agency**  
Christchurch, Level 1, BNZ Centre, 120 Hereford Street  
PO Box 1479, Christchurch 8011, New Zealand  
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## Peter Dymock

---

**From:** Environmental Planning <EnvironmentalPlanning@nzta.govt.nz>  
**Sent:** Thursday, 8 February 2024 3:53 pm  
**To:** Peter Dymock  
**Subject:** Waka Kotahi NZ Transport Agency - Case Ref # - Application-2024-0140 - A new Environmental Planning request has been logged CRM:0093126303

Dear Peter Dymock,

Thank you for your application. Your reference : ,

Your application has been assigned to the Environmental Planning Team and you should expect to receive a response within the next 20 working days. If you have any further queries or concerns on this matter, please do not hesitate to contact us via email quoting case ref: Application-2024-0140 or visit our [website](#).

***Note: Due to the high work loads of our team there maybe a delay in our response.***

Kind Regards,

### Environmental Planning Team

Transport Services

**E** [environmentalplanning@nzta.govt.nz](mailto:environmentalplanning@nzta.govt.nz) / **w** <http://www.nzta.govt.nz>

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## Peter Dymock

---

**From:** Peter Dymock  
**Sent:** Thursday, 8 February 2024 10:38 am  
**To:** Environmental Planning  
**Cc:** Duncan White; leon@benchmarkconstruction.co.nz  
**Subject:** Proposed Private Plan Change - Springvale Road & SH 8 , Clyde - Hartley Road Partnership - Preliminary Consultation  
**Attachments:** A5202\_PLAN\_1A.pdf

Dear Sir/Madam

1. Paterson Pitts Limited Partnership (PPLP) act for the Hartley Road Partnership ( HRP)
2. HRP propose to lodge a private plan change request to the Central Otago District Council to re-zone its site adjacent to SH 8 and Springvale Road, Clyde from "Rural Resource Area" to "Industrial" .
3. The attached outline development plan (ODP) gives an indication of the form of development that could eventuate on the site
4. It is proposed to adopt the existing provisions of the Central Otago Operative District Plan (ODP) for the Industrial Resource Area in their entirety , with a minor rule addition to the ODP such that no direct access to the site for any lot from SH8 or Springvale Road is possible .
5. However , it is also noted that physical access to the site from SH8 is not actually physically practicable and that SH8 is a limited access road .
6. Carriageway Consultants have been engaged to prepare an Integrated Transport Assessment (ITA) to support the request . It is noted that "active transport" options to access the site are well provided for by the Central Otago Rail Trail and the SH8 underpass link to Clyde township .
7. It is intended to lodge the request within about 3 months .
8. This is preliminary " heads up" consultation with NZTA . Any preliminary comments or advice that NZTA may have on the proposal would be appreciated.

Yours faithfully



### Peter Dymock

Senior Planner

**M** 027 437 7910

**E** [peter.dymock@ppgroup.co.nz](mailto:peter.dymock@ppgroup.co.nz)

Paterson Pitts Limited Partnership, trading as:

**PATERSONPITTSGROUP**

**Surveying • Planning • Engineering**

**Your Land Professionals**

Alexandra Office:

6 Skird Street, Alexandra

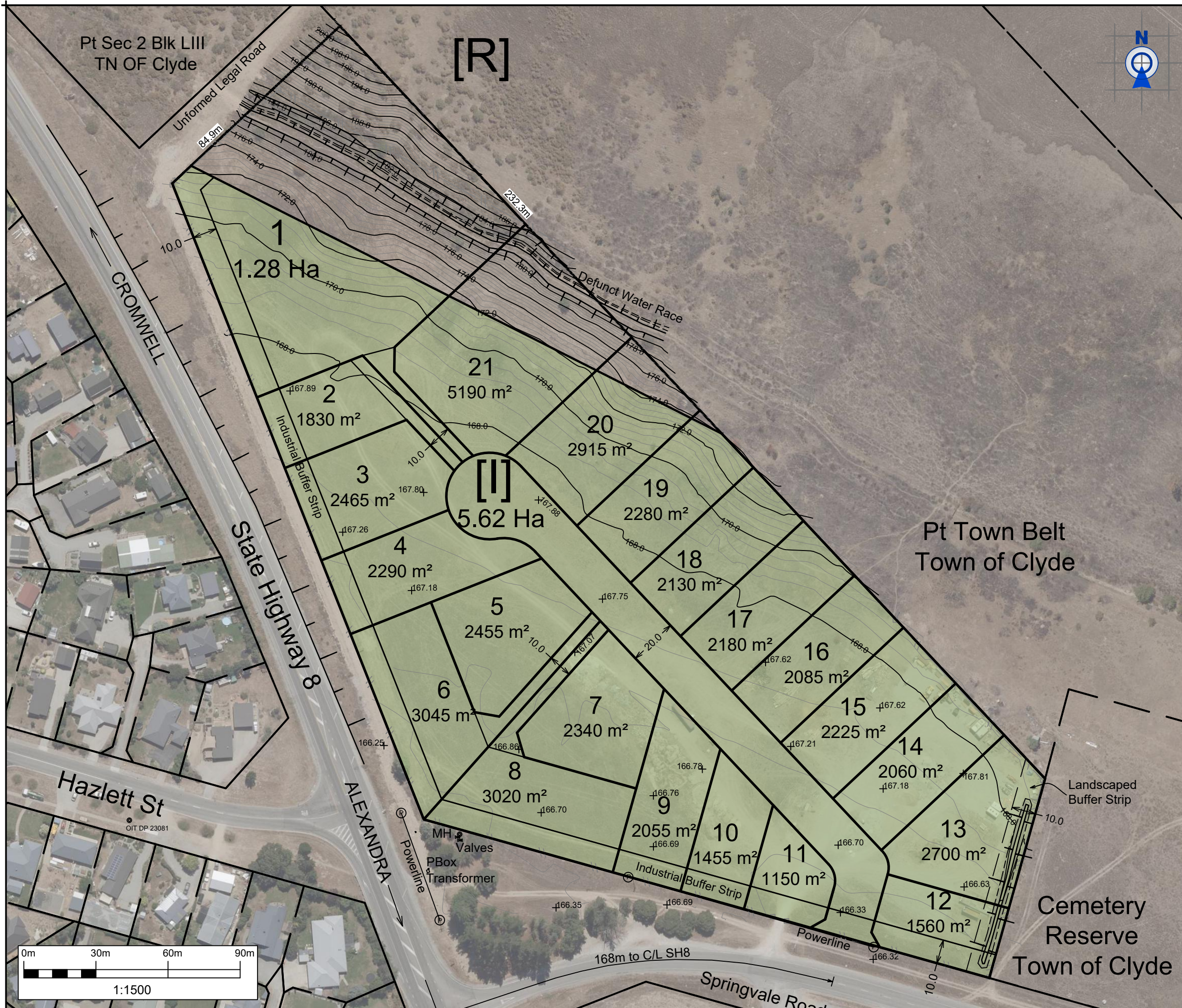
or P.O. Box 103, Alexandra 9340, New Zealand

**T** 03 4488775

**W** [www.ppgroup.co.nz](http://www.ppgroup.co.nz)

## Appendix '2' – Possible Subdivision





Coordinates are in terms of  
Lindis Peak 2000.

Elevation in Terms of:  
NZVD 2016 Level Datum

Origin of Levels  
IT DP 23081 (EWEG)  
RL= 166.30m

Contour Intervals = 0.50m

Land to be rezoned  
as industrial

**Note!**

- No direct access to SH8 or Springvale Road for any lot.
- Subdivision layout indicative only. (Not a structure plan)



ALEXANDRA  
8 Skird Street  
Alexandra 9320  
  
T +64 (3) 448 8775  
E alexandra@patersons.co.nz

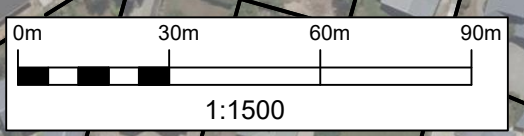
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Client & Location:  
  
**Hartley Road Partnership**

Purpose & Drawing Title:  
**PROPOSED ZONING PLAN  
PLAN CHANGE 23**

**FOR INFORMATION**

Surveyed by:	BD	Original Size:	Scale:
Designed by:		A3	1:1500
Drawn by:	KWG		
Checked by:	PD	<b>DO NOT SCALE</b>	
Approved by:	PD	Job No:	Revision No. / Date:
A5202	PLAN	Sheet No: 1	B / 27/09/2024





## Appendix 'E' - Sec 32 Evaluation



---

REQUEST FOR A CHANGE  
TO THE OPERATIVE  
CENTRAL OTAGO DISTRICT PLAN

Evaluation under Section 32 of the  
Resource Management Act 1991

**HARTLEY ROAD PARTNERSHIP**

---

**patersons.co.nz**

**Dunedin**

PO Box 5933  
Dunedin 9054

03 477 3245

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## 1.0 INTRODUCTION

The Request needs to be evaluated in accordance with Sec 32 of the Resource Management Act 1992. Sec 32 states:

*“32 Requirements for preparing and publishing evaluation reports*

1. *An evaluation report required under this Act must –*
  - a) *Examine the extent to which the objectives of the proposal being evaluated are the most appropriate way to achieve the purpose of this Act; and*
  - b) *Examine whether the provisions in the proposal are the most appropriate way to achieve the objectives by –*
    - i. *Identifying other reasonably practicable options for achieving the objectives; and*
    - ii. *Assessing the efficiency and effectiveness of the provisions in achieving the objectives; and*
    - iii. *Summarising the reasons for deciding on the provisions; and*
  - c) *Contain a level of detail that corresponds to the scale and significance of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the proposal.*
2. *An assessment under subsection (1)(b)(ii) must –*
  - a) *Identify and assess the benefits and costs of the environmental, economic, social and cultural effects that are anticipated from the implementation of the provisions, including the opportunities for –*
    - i. *Economic growth that are anticipated to be provided or reduced; and*
    - ii. *Employment that are anticipated to be provided or reduced; and*
  - b) *If practicable, quantify the benefits and costs referred to in paragraph (a); and*
  - c) *Assess the risk of action or not acting if there is uncertain or insufficient information about the subject matter of the provisions.*
3. *If the proposal (an amending proposal) will amend a standard, statement, regulation, plan, or change that is already proposed or that already exists (an existing proposal), the examination under subsection (1)(b) must relate to –*
  - a) *The provisions and objectives of the amending proposal; and*
  - b) *the objectives of the existing proposal to the extent that those objectives –*
    - i. *are relevant to the objectives of the amending proposal; and*
    - ii. *would remain if the amending proposal were to take effect...”*

The Economic Assessment at **Appendix F** has identified that there is only 3.8ha of vacant developable Industrial Zoned land remaining in Alexandra and there is no Industrial Zoned land in Clyde . This is insufficient to provide for the foreseeable demand in the short, medium and long term for Industrial Land in the District .

The objectives of the Request therefore are:

- To provide sufficient industrial development capacity to satisfy the reasonably foreseeable demand for such development in the Clyde area as determined by the Economic Assessment.
- To retain flexibility to respond to changing market place preferences in an efficient manner.

- To locate industrial development in close proximity to Clyde township on a site that ensures that reverse sensitivity and adverse amenity effects on residential land are minimised and that there is no effective loss of highly productive land
- To locate industrial development on a site that ensures a safe and efficient transport network that integrates well into the existing roading network.

The Economic Assessment at **Appendix F** of the Request has identified, quantified and assessed the economic, employment and social benefits and costs that are anticipated from the implementation of the Request. These are also traversed in para 3.0 (Effects Relating to Industrial Land Supply & Growth) of the Assessment of Environmental Effects at **Appendix D** of the Request. In summary the anticipated economic benefits of the Request will outweigh the potential economic costs. The plan change will positively contribute to the economic well being of the Clyde community and is not inconsistent with the strategic planning options being considered by Council.

## 2.0 OPTIONS FOR ACHIEVING THE OBJECTIVES OF THE REQUEST

There are a number of options to achieve the objectives of the Request which are outlined and discussed below.

Potential Options	Discussion
Do nothing: Retain the Rural zoning of the site	<p>This option would require resource consents to achieve the objectives of the Request. This creates the following costs:</p> <p>(a) Non-complying subdivision and land use consents would be required to breach almost all of the Rural Resource Area Rules for industrial activity.</p> <p>(b) This would create significant transaction costs for applicants and an administrative burden for Council which would be incurred repeatedly and be extremely inefficient for achieving the objectives of the Request.</p> <p>(c) Uncertain outcomes from numerous, public processes.</p> <p>This potential option is not reasonably practical will not be considered further in this evaluation.</p>
Await Council District Plan Review	<p>The Central Otago District Plan is due for review and an option may be to await the review and then submit requesting suitable zoning for the site.</p> <p>(a) There is no firm timetable for this review and it is now unlikely to happen given the pending Central Government replacement of the RMA91.</p> <p>(b) Council initiated changes to the Operative District Plan to provide for Industrial Activity consequent upon the Vincent Spatial Plan (VSP) may be years away. The VSP also does not provide for any additional industrial land capacity in Clyde. Given the immediate lack of vacant industrial land in Clyde, the Requestor wishes to proceed with its re-zoning proposal now, rather than wait for Council's initiated plan changes.</p> <p>Accordingly, this option will not be considered further in this evaluation.</p>
Request a Private Plan Change that seeks to rezone the site to an existing resource area, subject to modifying the zoning provisions to enable site specific requirements.	<p>This option is potentially efficient as it utilises and minimally modifies an existing resource area (the Industrial Resource Area) within the District Plan.</p> <p>This option is reasonably practical and is considered further below.</p>

Request a Private Plan Change to create an entirely new resource area with bespoke planning provisions.	This option is for a "Master planned" form of development This option may have some advantages and is considered further below.
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Based on the evaluation above, the potential options that are reasonably practical and worth considering further are:

**Option 1** Request a Private Plan Change to change the zoning of the site to an existing resource area and to modify the zoning provisions (policies and rules) of the resource area to enable site-specific requirements.

**Option 2** Request a Private Plan Change to create a new bespoke resource area.

### 3.0 EVALUATION OF THE COSTS & BENEFITS OF THE PREFERRED OPTIONS & EVALUATION UNDER PT 2 SEC 5 RMA 91 (PURPOSE OF RMA91)

Option 1	Re-zone the site with an existing zone (Industrial Resource Area)
Benefits	<ul style="list-style-type: none"> <li>* The existing zoning is well understood and can be easily implemented.</li> <li>* Compatible with the existing zoning provisions in the District Plan.</li> <li>* Provides flexibility to respond to changing market and social and economic preferences.</li> <li>* Provides for a comprehensive range of industrial and commercial uses.</li> </ul>
Costs	<ul style="list-style-type: none"> <li>* Provides less certainty to Council and community as to the detailed form of development of the site.</li> </ul>
Efficiency	<ul style="list-style-type: none"> <li>* Only minor amendments required to District Plan, therefore less costs to Council and requester.</li> <li>* Avoids over-complicating the District Plan.</li> </ul>
Effectiveness	<ul style="list-style-type: none"> <li>* Simple and effective method of achieving the objectives of the Request.</li> </ul>
Risk of acting (or not acting)	<ul style="list-style-type: none"> <li>* By not acting, there is the risk that the land ownership would be fragmented by rural - residential development of the site which would be a lost opportunity to achieve a more efficient and effective use of the land and infrastructure resources. There is no significant risk with proceeding with the Request.</li> </ul>

Option 2	Re-zone the site with a bespoke zoning
Benefits	<ul style="list-style-type: none"> <li>* Provides some certainty to Council and Community as the out come of the development of the site, typically by way of a "masterplan".</li> </ul>
Costs	<ul style="list-style-type: none"> <li>* Expensive to implement for both the Council and the Requestors requiring detailed design at the outset.</li> <li>* Does not respond well to changing market preferences and socio-economic conditions which can often require further plan changes, and/or non-complying resource consents to implement.</li> <li>* Users of the plan may be unfamiliar with the bespoke provisions.</li> </ul>



Efficiency	* Complex changes required to District Plan.
Effectiveness	* Can be an effective way of achieving the objectives of the Request.
Risk of acting (or not acting)	* As above

On balance, it is considered that the most preferable option is to request a Private Plan Change to change the zoning of the site to the District Plan's existing Industrial Resource Area with minor additions modifications to the rules to enable site-specific requirements to be met.

Sec 5(1) RMA91 provides that the purpose of the Act is to promote the sustainable management of natural and physical resources .

Sec 5(2) RMA91 defines "sustainable management" as meaning *managing the use, development and protection of natural and physical resources in a way, or at a rate, which enables peoples and communities to provide for their social, economic and cultural well being and for their health and safety while-*

- (a) *Sustaining the potential of natural and physical resources ( excluding minerals) to meet the reasonably foreseeable needs of future generations ; and*
- (b) *Safeguarding the life-supporting capacity of air, water, soil and ecosystems; and*
- (c) *Avoiding, remedying, or mitigating any adverse effects of activities on the environment.*

The Economic Assessment at **Appendix F** of the Request has concluded that in order to provide for the social and economic well being of the people and community of Clyde and District, a provision for industrial land needs to be made available to address the demand for such land in Clyde ( ie the objective of the Request) . This Request to re-zone the most suitable site for industrial development in close proximity to Clyde ( and formerly zoned Industrial) is the most appropriate way of achieving this purpose. In accordance with the Assessment of Environmental Effects at **Appendix D** of the Request, this plan change will have no adverse effects on the life supporting capacity of the site and will avoid or mitigate adverse effects on the environment .

It is therefore concluded that the objectives of the request are the most appropriate way of achieving the purpose of the RMA .

## 4.0 EVALUATION OF THE REQUEST AGAINST THE DISTRICT PLAN'S OBJECTIVES AND POLICIES

Section 9 of the District Plan has a number of objectives and supporting policies that are relevant to the proposed change:

It is proposed that these existing objectives and policies be retained with no amendments. An evaluation of the Request against these provisions follows.

### 4.1 Objectives

#### Obj 9.1.1 Protection of Amenity Values

To manage industrial activities to ensure that :

- (a) Adverse effects on other land uses are avoided, remedied or mitigated ; and
- (b) Amenity values of neighbouring resource areas are maintained.

#### Obj 9.1.2 Management of Effects of Industrial Activities

To manage industrial activities within the Industrial Resource Area to ensure that :

- (a) A reasonable working environment for other industrial activities is maintained , and
- (b) The sustainable management of network utility services including roading is promoted, while
- (c) Enabling the operation of a wide range of activities

*Comment: The site subject to the Request is well separated from the Clyde Residential Area by a wide state highway road reserve that is elevated above both the site and the residential area by an embankment which provides both a visual and sound barrier . Further landscape screening is also proposed in the Request. Land use on the immediate boundaries of the site ( ie unoccupied and undeveloped bare land that is likely to remain so ) and across Springvale Road ( industrial and commercial use) are compatible with industrial use of the site. The site is well connected to the roading network and can be connected to all reticulated utility services including water supply , wastewater , power and telecommunications . The existing zoning rules in the District Plan provide for a wide range of activities in the Industrial Resource Area .*

#### Obj 12.3.1 Safe & Efficient Roading Network

To promote the safe and efficient operation of the District's Roading Network

*Comment: Proposed rules 12.7.1 (iii) (h) & (i) and 12.7.1 (ix) will ensure the safe and efficient operation of the roading network by an upgrade of the intersection of SH8 and Springvale Road and preventing direct access onto those roads*

- Obj 12.3.2 Protection from Noise
- Obj 12.3.3 Reducing the adverse effect of Signs
- Obj 12.3.4 Avoidance, Remediying or Mitigation of Nuisances
- Obj 12.3.5 Derelict Buildings , Sites and Works
- Obj 12.3.6 Temporary Activities

*Comment : The policies and rules that give effect to these objectives will remain unchanged . The very purpose of the Industrial Resource Area is to provide suitable sites where activities with a low level of amenity , but which are economically and socially essential , can locate without adversely affected the amenity of adjoining land .*

#### Obj 12.3.7 Transmission Lines

*Comment : Not applicable to the Request.*

### 4.2 Policies

#### Pol 9.2.1 Provision for Industrial Activities

To provide for the location of industrial activities to avoid , remedy or mitigate adverse effects on other land use activities

#### Pol 9.2.2 Maintenance of Visual Amenity Values

To avoid , remedy or mitigate the adverse visual appearance that some industrial area and activities can have by :

- (d) Ensuring appropriate separation and screening from adjacent resource areas.
- (e) Ensuring the bulk and location of buildings does not dominate adjacent resource areas.
- (f) Reducing the visual intrusion of signs.

*Comment: Policy 9.2.1 directs Council to provide for appropriate locations for the growth of industrial activity where effects can be managed. The site is well screened and separated from the Clyde Residential Resource Area by the State Highway embankment and by proposed landscape screening . There will be no adverse effects on other land use activities which are already industrial / commercial in nature or undeveloped bare land that is likely to remain so for the foreseeable future .*

#### Pol 9.2.3 Adverse Effects

To ensure industrial activities are managed so that :

- (a) Waste products are disposed of adequately ,and
- (b) The effects of noise , odour, dust , light spill and electrical interference on neighbouring areas are avoided, remedied or mitigated , and
- (c) The community's safety and wellbeing is safeguarded from the effects of noxious or objectionable processes.

#### Pol 9.2.4 Maintenance of Industrial Resource Area

To ensure that the amenity values of residential sites, including privacy and ability to access adequate daylight and sunlight, are not significantly compromised by the effects of adjoining development.

#### Pol 9.2.5 Infrastructure

To ensure that industrial activities avoid, remedy or mitigate adverse effects on infrastructure by:

- (a) Providing appropriate access and facilities for the loading and manoeuvring of vehicles.
- (b) Maintaining and enhancing the safe and efficient operation of the roading network.
- (c) Contributing to a fair and reasonable proportion to any upgrading or development of infrastructure that may be required as a result of the activity

*Comment: The rules that give effect to Policies 9.2.3 , 9.2.4 and 9.2.5 will remain unchanged, apart from minor site specific additions to achieve Policy 9.2.5 (b).*

#### Pol 12.4.1 Parking Loading & Manoeuvring

*Comment: Rules 12.7.2 and 12.7.3 which give effect to the policy will remain unchanged.*

#### Pol 12.4.2 Noise

*Comment: Rules 12.7.4 and 9.3.6 (iii) (a) & (b) which give effect to this policy will remain unchanged.*

Pol 12.4.3 Noise from Temporary Activities

*Comment: Rule 12.7.4 (ii) & (iii) which give effect to this policy will remain unchanged .*

Pol 12.4.4 Signs

*Comment : Rules 12.7.5 and 9.3.6 (v) which give effect to this policy will remain unchanged*

Pol 12.4.5 Temporary Signs

Pol 12.4.6 Public Safety and Information Signs

*Comment: Rule 12.7.5 (i) which gives effect to these policies will remain unchanged*

Pol 12.4.7 Management of Nuisance Effects

*Comment: Rule 12.7.6 which gives effect to this policy will remain unchanged*

Pol 12.4.8 Derelict Sites and Buildings

*Comment: Not applicable to the Request*

Pol 12.4.9 Temporary Activities

*Comment: Existing rules 12.7.4 (iii) and 12.7.5 (i) which will remain unchanged give effect to this policy*

Pol 12.4.10 Transmission Lines

*Comment: Not applicable to the request*

In summary, the Request complies with and gives effect to the District Plan's relevant objectives and policies.

## 5.0 EVALUATION OF THE REQUEST'S METHODS & RULES

Plan provision/Rule	Discussion
<b>12.7.1(iii) (h) &amp; (i), 12.7.1 (ix)</b> Addition to this rule to provide that a left turning slip lane be constructed on SH 8 at the SH8/Springvale Rd intersection prior to development on the site and a breach of this rule to be non-complying.	This rule is required to ensure the safety and efficiency of the SH8/Springvale Road intersection which the Transport Assessment at <b>Appendix G</b> has identified as already being required . The Request will generate increased traffic onto this intersection.
<b>9.3.6 (iv) (d)</b> Addition to this rule to provide for a 10m wide landscaped buffer strip along the road and Clyde Cemetery Reserve frontages of the site.	As identified in the landscape assessment at <b>Appendix K</b> , the site has a high level visibility from the roading network and a framework of trees is required to soften and screen views of industrial buildings, yard and signs etc.

## 6.0 EVALUATION OF THE REQUEST UNDER NATIONAL PLANNING INSTRUMENTS

### 6.1 National Policy Statements

The following National Policy Statements (NPS) are in effect:

- NPS on Urban Development
- NPS for Highly Productive Land
- NPS for Freshwater Management
- NPS for Greenhouse Gas Emissions from Industrial Process Heat
- NPS for Indigenous Biodiversity
- NPS for Renewal Electricity Generation
- NPS on Electricity Transmission
- NZ Coastal Policy Statement

Legal advice provided by MacTodd to the hearings panel for PC19 indicates that Cromwell is an urban environment in accordance with the NPS on Urban Development (NPS-UD), and therefore the Central Otago District Council is a Tier 3 territorial authority.

With a population of under 1,500 Clyde is not an “urban environment”, as defined in the NPS on Urban Development Capacity (NPS-UD) as:

*“.....any area of land (regardless of size, and irrespective of local authority or statistical boundaries ) that*

- (a) is , or is intended to be predominantly urban in character; and*
- (b) is , or is intended to be, part of a housing and labour market of at least 10,000 people”*

Accordingly the NPS-UD is not a directly relevant planning document in the context of the Request.

Nevertheless the NPS-UD is of some application as Council , as a Tier 3 territorial authority, is subject to Policy 2 (and clauses 3.2 and 3.3) of the NPS-UD that require Council to generally provide at least sufficient development capacity to meet expected demand for business land over the short, medium and long term in its District . This reinforces Council’s function under Sec 31(1) (aa) RMA91 for *“the establishment, implementation and review of objectives, policies and methods to ensure that there is sufficient development capacity in respect of housing and business land to meet the expected demands of the district”*. (my underlining).

The application of the NPS for Highly Productive Land (NPS-HPL) to the site is addressed in the Land Productivity Report at **Appendix L**. The report concludes that although part of the site is potentially suitable for highly productive rural use , the lack of a suitable irrigation water supply and noise reverse sensitivity effects with the Clyde residential area means that this potential cannot be realised and that the Request complies with all of the exception criteria in the NPS-HPL .



The Economic Assessment at **Appendix F** (para 4) also finds that the Request complies with clause 3.6 (4) of the NPS-HPL in that:

- the re-zoning is required to provide sufficient development capacity in the District
- there are no other reasonably practical and feasible options to provide the development capacity
- the economic benefits of rezoning outweigh the economic costs of foregoing land-based primary production

There is no other NPS relevant to this Request.

## 6.2 National Environmental Standards

The following National Environmental Standards (NES) are in effect:

- NES for Air Quality
- NES for Sources of Human Drinking Water
- NES for Telecommunication Facilities
- NES for Electricity Transmission Activities
- NES for Assessing and Managing Contaminants in Soil to Protect Human Health
- NES for Commercial Forestry
- NES for Greenhouse Gases from Industrial Process Heat
- NES for Marine Aquaculture
- NES for Storing Tyres Outdoors
- NES for Freshwater

The NES for Air Quality makes the Otago Regional Council responsible for managing air quality under the RMA91 and the Central Otago District Council responsible for issuing permits for qualifying solid fuel heaters in air sheds 1 & 2 under the Regional Plan: Air. The site is not within either air shed (1) or air shed (2).

The NES for Assessing and Managing Contaminants in Soil to Protect Human Health has been dealt with under the Preliminary Site Assessment at **Appendix H**.

In summary, there will be no risk to human health from soil contamination by subdivision and development of the site for industrial use.

There is no other NES relevant to this Request.

## 7.0 EVALUATION OF THE REQUEST UNDER REGIONAL PLANNING INSTAMENTS

### 7.1 Regional Policy Statement 1998

The Regional Policy Statement 1998 was fully revoked as of 15 March 2021.

## 7.2 Operative Regional Policy Statement 2019 (oRPS)

The objectives and policies of the oRPS are addressed as follows:

Objectives and Policies	Comment/Analysis
<b>2.1 to 2.2 (Kai Tahu values and interests)</b>	The oRPS requires that Kai Tahu values and interests are recognised and kaitiakitaka is expressed. Discovery protocols can best be put in place at the subsequent resource consent stage to develop the site. The site is not subject to any statutory acknowledgement in the Ngai Tahu Claims Settlement Act 1998. Aukaha have advised that there are no recorded sites of cultural importance in the area and that a cultural impact report will not be required. Aukaha will be notified of the Plan Change and will have further opportunity to submit.
<b>3.1 to 3.2 (Functions and values of Otago's ecosystems and natural resources)</b>	The site does not contain any significant natural ecosystems and habitats of indigenous species, fresh water bodies or wetlands. The site is not in an area of outstanding natural features or landscapes. Any significant use of the site for primary production cannot be realised due to the absence of a suitable source of irrigation water.
<b>4.1 (Risk that natural hazards pose to Otago's communities are minimal)</b>	A search of the Otago Regional Council's Natural Hazards Database shows that the site is not subject to any natural hazard. The site specific Geotechnical Assessment at <b>Appendix J</b> also finds that the site is not subject to natural hazards. The Request enables increased development within a site that is not hazard prone and does not pose a risk to ecosystem values. It does not compromise the safety of the local road network. The proposal does not increase the risk or the consequences of risk of natural hazards affecting human life, infrastructure and property.
<b>4.3 (infrastructure managed and developed in a sustainable way)</b>	The site will be connected to the Council water and wastewater reticulations and is well integrated into the transport infrastructure, with no adverse effects on existing infrastructure.
<b>4.5 (urban growth and development is well designed, occurs in a strategic and co-ordinated way and integrates effectively with adjoining urban and rural environments)</b>	The Plan Change enables development that can integrate effectively with the adjoining urban and rural environments, to ensure there is sufficient industrial land development capacity. All necessary infrastructure is, or will be, in place to enable industrial development of the site. The site is underlain by a considerable depth of highly permeable glacial out wash gravels which will facilitate direct disposal of stormwater to ground, in compliance with low impact design principles.
<b>4.6 Hazardous substances, contaminated land and waste materials do not harm human health or the quality of the environment in Otago.</b>	The PSI at <b>Appendix H</b> has been provided with the Request and confirms the site is suitable for industrial activity.
<b>5.3 Sufficient land is managed and protected for economic production</b>	The Request provides a specific area to accommodate the effects of industrial activities and provides a range of land suitable for different industrial activities on a site that will not generate reverse sensitivity effects.

## 7.3 Proposed Regional Policy Statement 2021 (pRPS)

The pRPS is still subject to decision making and has limited application to this Request, but is briefly evaluated as follows:

Objectives and Policies	Comment/Analysis
<b>MW – Manawhenua</b>	See comments above under 2.1-2.2 of the oRPS.
<b>LF-PW-P15 Stormwater and wastewater discharges</b>	There is no reticulated stormwater system in Clyde. Stormwater will be disposed of direct to ground within the site itself. Wastewater will be discharged into the Council reticulation.
<b>LF -CS- P19 Highly Productive Land</b>	Any significant use of the site for primary production cannot be realised due to the absence of a suitable source of irrigation water and potential reverse sensitivity effects with the Clyde Residential Area.
<b>EIT-INF-P17 Urban Growth and Infrastructure</b>	The site is well integrated into the transport infrastructure and will be connected to existing reticulated infrastructure with no adverse effects on the infrastructure headworks.
<b>EIT – TRAN -P19 Transport System Design</b>	The Request provides for an upgrade of the intersection of SH8 and Springvale Road.
<b>HAZ-NH-O1 Natural Hazards</b>	As per Geotech report at <b>Appendix J</b> . The site is not subject to any natural hazards.
<b>HAZ – CL Contaminated land</b>	A PSI at <b>Appendix H</b> has been provided with the Request and confirms the site is suitable for industrial activity.
<b>HCV – NH Historic heritage</b>	The area subject to the Request does not contain any sites of Historic Heritage .
<b>NFL-O7 Outstanding Natural Features</b>	The area subject to the Request does not contain any outstanding natural features or landscapes.
<b>UFD -O2 Development of urban areas</b> <b>UFD-O3 Strategic Planning</b>	The request allows business activities to meet the need of the Clyde community in the short, medium and long term in an appropriate location while respecting historic sites and providing for active transport via a state highway underpass and the Otago Central Rail Trail. The Request minimises conflict between incompatible activities that would occur if the site was developed for intensive rural land use . It achieves integration of land use with existing development infrastructure and facilitates the safe and efficient use of the regionally significant State Highway and arterial road infrastructure. The Request will result in consolidated, well designed and located industrial development that is sustainable and located adjacent to existing urban areas and will be the primary focus for accommodating the area’s industrial growth and change.

## 8.0 EVALUATION OF THE REQUEST AGAINST THE KAI TAHU KI OTGAO NATURAL RESOURCE MANAGEMENT PLAN (2005)

Section 3 of the Operative District Plan puts in place the framework within which issues of concern to Kai Tahu ki Otago in the context of the Act are recognised and provided for in the Central Otago District. Policy 3.4.1 of the Operative District Plan explicitly recognises the 1995 version of the Iwi Management Plan as the principal resource management reference planning document for the Central Otago District.

To the extent that the Request is simply applying an existing (Industrial) zoning provision to the site, the District Plan already incorporates consideration of issues of concern to Kai Tahu on any subsequent subdivision development of the site.

Clyde is located within the Clutha-Mata-au Catchment, and this is described at Section 10.1 of the 2005 Management Plan as:

*“The Clutha/Mata-au Catchment centres on the Clutha/Mata-au River and includes all sub catchments within this main Catchment.*

*Wai Maori Issues:*

*Land Use:*

- *Lack of reticulated community sewerage schemes.*
- *Existing sewage schemes are not effectively treating the waste and do not have the capacity to cope with the expanding population.*
- *Land use intensification, for example dairying in the Poumahaka Catchment.*
- *Increase in the lifestyle farm units is increasing the demand for water.*
- *Sedimentation of waterways from urban development.*

*Policies:*

*Land use:*

9. *To encourage the adoption of sound environmental practices, adopted where land use intensification occurs.*
1. *10. To promote sustainable land use in the Clutha-Mata-au Catchment.*
2. *11. To encourage all consents related to subdivision and lifestyle blocks are applied for at the same time including, land use consents, water consents, and discharge consents.*
3. *12. To require reticulated community sewerage schemes that have the capacity to accommodate future population growth.*

**10.3 WAHI TAPU**

**10.3.1 Wahi Tapu in the Clutha/mata-au Catchments**

*There are a range of wāhi tapu, but physical resources such as mountain tops, springs and vegetation remnants are other examples. Urupā and some significant sites of conflict are located all along the Clutha Mata-au River.*

**10.3.3 Wāhi Tapu Policies in the Clutha/Mata-au Catchment**

1. *To require that wāhi tapu sites are protected from further loss or destruction*
2. *To require accidental discovery protocols for any earth disturbance activities.”*

The Mata-au/Clutha River is also an area of statutory acknowledgement in schedule 11 RMA91 (Ngai Tahu claim Settlement Act 1998).

The site will connect to reticulated wastewater and water services that have the capacity to accommodate the growth. All stormwater will be disposed of direct to ground within the confines of the site and the site is not adjacent to the Mata-Au/Clutha River. No water take consents will be required to subdivide and develop the site. There is no known waahi tapu associated with the site. An accidental discovery protocol can be imposed by resource consent conditions.

The Request therefore accords with the issues, objectives and policies of the Management Plan.

## 9.0 EVALUATION OF THE REQUEST AGAINST THE OTAGO SOUTHLAND REGIONAL LAND TRANSPORT PLAN

The Request fully complies with the long-term strategic objectives of the Plan in that:

- Alternative transport modes are available by the Rail Trail & SH 8 underpass (cycling and walking) close to the Clyde township (the Plan provides that 10km for cycling and 2km for walking is considered to be the normal limit for these transport methods).
- A suitable intersection onto Springvale Road will provide for reliable, resilient and safe access to the network. Section (9.5.1) of the Transport Assessment in **Appendix G** also concludes that the Request complies with the Regional Land Transportation Plan.

## 10.0 EVALUATION AGAINST THE VINCENT SPATIAL PLAN (VSP)

The VSP is not a statutory instrument and can therefore have limited application to the consideration of this Request. Nevertheless, it does indicate the strategic direction to accommodate growth in the Clyde- Alexandra area envisaged by Council and the community.

The VSP proposes an industrial area adjacent to the Clyde Railhead “*to recognise existing activities*” (ie those subject to scheduled activity SA105I – the Contact Energy storage shed/yard and a rural fire station site). However that does not provide for future industrial activity growth. This request is a logical extension of this existing industrial node on the only possible remaining vacant site suitable for industrial activity close to Clyde and just over Springvale Road from this existing activity.

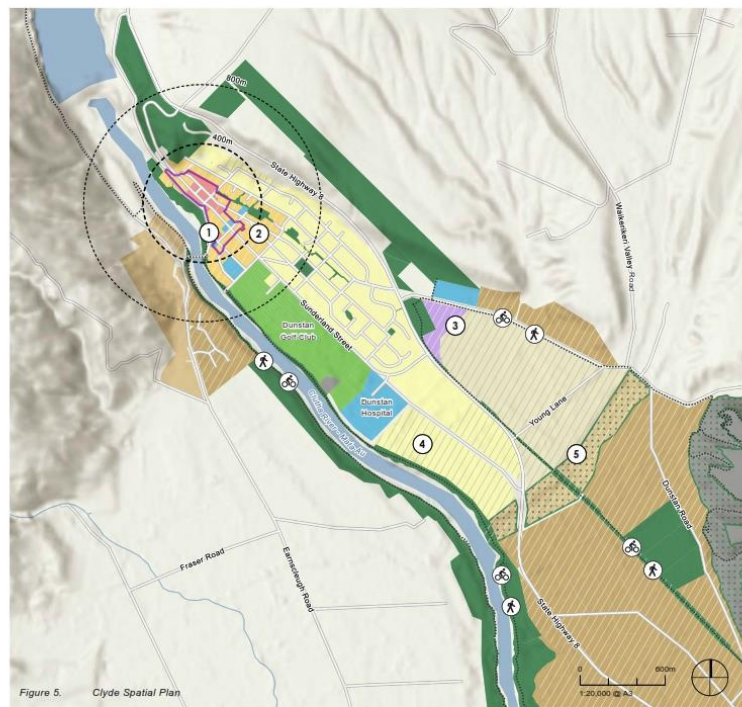


## CLYDE SPATIAL PLAN

Clyde's managed growth would progressively consolidate and expand southwards from the historic town centre, near the Clyde Dam and Clyde Bridge gateways. Like Alexandra, it is highly adaptable to more intensive infill opportunities near the town centre. There are also clear urban boundaries where comprehensive greenfield development could occur including the Mata-au/Clutha River, Waikerikeri Creek, Clyde town belt reserve and the proposed amenity buffer along the steep terrace embankment on the town's eastern edge.

### KEY FEATURES:

- ① A small extension of the existing town centre and associated heritage precinct is proposed to maintain Clyde's character as it grows.
- ② Medium density residential infill of the existing street grid close to the Clyde town centre is proposed, led by character guidelines.
- ③ An industrial area adjacent to the Clyde Railhead is proposed to recognise existing activities.
- ④ Lower density residential greenfield expansion would continue further into the Muttontown area and rural residential properties could be downsized to large lots at the top of Springvale Road.
- ⑤ A new cross-terrace amenity area provides an opportunity to establish a green corridor and an active travel connection along Waikerikeri Creek that would also define the urban limits of Clyde to the south.



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## 11.0 CONCLUSION

The above evaluation has assessed the Request under Section 32 of the Resource Management Act 1991. The conclusions from this evaluation can be summarised as follows:

- The objectives of the Request are necessary and are an appropriate way to achieve the purpose of the Resource Management Act.
- The Request complies with and gives effect to the objectives and policies of the District Plan and higher order planning instruments.
- The provisions of the Request will be efficient and effective in achieving the objectives of the Request, taking into account their costs and benefits.
- There is no risk of the activity, given that the provisions of the Request manage the effects of the activity or the wider environment and there is no uncertainty in or in sufficiency of information about these provisions. There is a risk of not acting because the land and infrastructure resource could be lost to inefficient land uses.

## Appendix 'F' - Market/Economics Assessment

Savvy Consulting Ltd  
46 Kennedy Crescent  
Wanaka 9305

27<sup>th</sup> September 2024

Adam Vincent  
Planning Officer  
Central Otago District Council  
[Adam.vincent@codc.govt.nz](mailto:Adam.vincent@codc.govt.nz)

Dear Adam

Thank you for your recent review of the Economic Assessment report submitted with the Private Plan Change 23 application. Based on your letter dated 17<sup>th</sup> September 2024, two bullet points in the Request for Further Information (RFI) related to the Economic report. This letter is intended to provide you with an overview of the changes I have now made to the Economic report and to provide my response to one of the matters you raised.

#### Constrained Vacant Industrial Zone Land

With respect to the constrained vacant land assessed, the following changes have been made to the report:

1. Lot 1 DP 650263 in Cromwell's Industrial Zone has been reclassified as just readily available 'vacant' land based on updated information of the orchard being cleared and development underway. Thank you for this new information.
2. The Vacant – Sloped site at the rear of the eastern Alexandra Industrial Zone has also now been amended. One third of the land is now treated as sloped and unsuitable for industrial development (identified as having a slope of 1:4 by Patersons), and the remaining two thirds of the site has been reclassified as just readily available 'vacant' land.
3. This retains just one site in Omakau as being 'Vacant – Sloped'. This site is small, and drops down below the road, with only a narrow strip of flat land adjacent to the road. I do not consider it necessary to measure the slope of that site in order to justify its classification.

4. The constraints of the large vacant site in the west Alexandra Industrial Zone were explained in the original report by way of a footnote. To avoid this important explanation being missed by future readers of the report, this text has now been moved up into the main body of the text. The site has multiple, and compounding constraints as advised by Patersons (who have investigated the site for previous owners over an extensive period). I rely on Paterson's land development expertise that this site does not represent suitable development capacity.
5. The only other constrained vacant site is classified as 'Vacant – Bush'. This site is located in Naseby. This classification is not considered ambiguous. The report notes that extensive vegetation clearance may be a deterrent for development, particularly if it triggers a consent for example. The classification of that site is not material to the conclusions of the Report.
6. The above changes have required changes to some graphs, tables or maps. The following have been updated and replaced: Figure 2.4, Table 2.4, Figure 2.6, Figure 2.7, Table 3.3, Appendix B map 1. Text changes have been made throughout the Report to cater for the above changes, including updates to the sufficiency results (although this has not changed the outcomes or final conclusions).

#### Long Term Benefits

With regard to your feedback that only the short-term benefits during construction have been considered, respectfully, this is not the case. While only the construction impacts have been quantified, all relevant short and long term economic benefits (and costs) have been identified in the report. As you'll be aware, there is no requirement under s32 for those to be fully quantified. Please refer to Section 5 of the Report where I have set out both benefits and costs of the proposal.

A key point made in the Economic Report is that there are no costs associated with loss of productive capacity on the site as the site is constrained for land based primary production and this is expected to apply over the long term. On that basis, only a small long term economic benefit of the proposal is needed to generate a net benefit from rezoning (and satisfy clause 3.6(1)(c)). There are multiple economic benefits (set out in the Report) that apply to the proposal in the short and long term. Other potential costs not limited to loss of primary production potential have also been identified.

With specific regard to the scope of effects required to be assessed under clause 3.6(1)(c), I consider that my report provides coverage of socio-economic costs/benefits (as applicable

and at a level of detail commensurate with the effects of the proposal). Cultural costs/benefits (if applicable) are outside the scope of the Economic Report.

I have made some minor amendments in Sections 4 and 5 of the Report to help clarify the matters above.

#### Other Amendments

I have taken the opportunity to make a few other minor edits to the Report. This includes adjusting the size of the proposed industrial zone within the landowner's site (now amended as a result of the RFI). I have also provided an update on the Council's recent acceptance of PPC21 in the text, but do not otherwise include the new industrial zone in the analysis as I understand it is not yet in the Operative District Plan (and continuing to exclude it does not have any material effect on the assessment).

I hope the above overview makes sense and helps you identify what has changed. The updated Economic Report is now dated 27<sup>th</sup> September 2024. The previous version of the Report should be disregarded.

Kind regards

Natalie Hampson

Director

[natalie@savvyconsulting.co.nz](mailto:natalie@savvyconsulting.co.nz)

## Appendix 'G' - Integrated Transport Assessment



## Peter Dymock

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**From:** Andy Carr <andy.carr@carriageway.co.nz>  
**Sent:** Friday, 20 September 2024 1:26 pm  
**To:** Peter Dymock; Duncan White  
**Subject:** RE: Plan Change 23 Further Information Request - Clyde Industrial Rezoning Request

Hi both

To respond to the RFI -

The traffic surveys were undertaken at the following times:

- Thursday 15 February 2024, 4pm to 6pm
- Friday 16 February 2024, 7am to 9am

Data was collected in one-minute intervals and the traffic flows reported are for the busiest continuous 60-minute periods within that. These were 4:35pm to 5:34pm, and 7:51am to 8:50am.

In terms of the proportion of heavy vehicles, the NZTA traffic counts show that the state highway carries 7% HGV and so this is what was used for the modelling. The reason for this was traffic volumes in the weekday peak hours are typically dominated by travel to and from work, and this therefore results in a lower proportion of HGVs in the traffic flows. Using the average daily volumes in the peak hours therefore presents a 'worst case'.

The MobileRoad website also says 15% HGV on Springvale Road and 65% on Hazlett Road. 65% is implausibly high, especially given that there's only 7% on the highway, so this data was disregarded. The actual data suggested a volume of 3-5% depending on which turning movement was assessed but this was rounded up to a consistent 5% (which seemed a better fit with the 7% on the highway).

For the assessment of the 'design year', the percentages were kept the same, that is, all types of vehicles were increased by the same proportion.

For the traffic generation of the development of the plan change area, this is again likely be dominated by car-borne travel decrease the percentages of HGVs. If 100% cars are assumed then this indicates that the overall HGVs would drop to around 4% of the total volumes on the minor intersection approaches. Again we took a conservative approach and so only reduced it from 5% to 4.5%.

Ultimately the analysis showed that even making these conservative assumptions the change in delays/queues was supportable. No further assessment was therefore done in terms of trying to optimise the model; in essence the proposal equates to an average of 1 extra vehicle movement exiting Springvale Road every 45 seconds at the busiest times, which is small and usually easily accommodated (unless the intersection is already under pressure – which in this case it is not). So there didn't seem much point in re-doing the modelling at a much finer grain. This can be done if needed, but it won't result in different conclusions being drawn.

Cheers

Andy

## Appendix 'H' - Soil Contamination Assessment

## Appendix 'I' - Infrastructure Assessment

## Appendix 'J' - Geotechnical Assessment

## Appendix 'K' - Landscape Assessment

# MIKE MOORE

*BSc, Dip LA, MRRP, ANZILA*

LANDSCAPE ARCHITECT

## Memorandum

To Peter Dymock  
Patersons

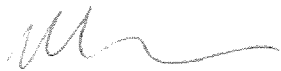
From Mike Moore

Date 26 September 2024

**Subject Proposed change to Proposed Plan Change 23**

Further to your request for comment, I consider that the proposed retention of the terrace riser slopes, including the water race, in the Rural Resource Area (rather than included as part of the proposed Industrial Resource Area) will enhance the landscape integrity of the terrace feature.

Kind regards



Mike Moore

Registered NZILA Landscape Architect



## Appendix 'L' - Land Productivity