

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

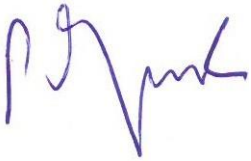
See attached updated economic assessment and response letter from Savvy Consulting.

#### 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