



AGENDA

Hearings Panel Meeting Tuesday, 24 March 2026

Date: Tuesday, 24 March 2026

Time: 9:00 am

Location: Alexandra Community House

Notice is hereby given that a Hearings Panel Meeting will be held at Alexandra Community House on Tuesday, 24 March 2026 at 9:00 am..

Order Of Business

1 Apologies 5
2 Reports 8
 26.1.1 PC00023 - PLAN CHANGE 23 - HARTLEY ROAD PARTNERSHIP 8

Members G Rae (Chairperson), Cr Tr Paterson, Cr M McPherson, Cr S Browne

In Attendance T Lines (Minute Secretary)

1 APOLOGIES

2 REPORTS

26.1.1 PC00023 - PLAN CHANGE 23 - HARTLEY ROAD PARTNERSHIP

Doc ID: 2749570

1. Purpose

A report to consider the Hartley Road Partnership request for change to the Central Otago Operative District Plan to rezone its land at Springvale Road and State Highway 8, from Rural Resource Area to Industrial Resource Area.

2. Attachments

- Appendix 1 - Section 42A Planners Report [↓](#)
- Appendix 2 - Covering Letter [↓](#)
- Appendix 3 - Application [↓](#)
- Appendix 4 - Appendix A - Land Subject to the Request [↓](#)
- Appendix 5 - Appendix B - Record of Title [↓](#)
- Appendix 6 - Appendix C - District Plan Maps [↓](#)
- Appendix 7 - Appendix D - Updated Assessment of Environmental Effects [↓](#)
- Appendix 8 - Appendix E - Updated s32 Assessment [↓](#)
- Appendix 9 - Appendix F - Updated Market Economics Assessment [↓](#)
- Appendix 10 - Appendix F-1 - Further Information Response Savvy Consulting Economics [↓](#)
- Appendix 11 - Appendix G - Integrated Transportation Assessment [↓](#)
- Appendix 12 - Appendix G-1 - Further Information Response Carriageway Consulting Transport [↓](#)
- Appendix 13 - Appendix H - Soil Contamination Assessment (PSI) [↓](#)
- Appendix 14 - Appendix I - Update Infrastructure Assessment [↓](#)
- Appendix 15 - Appendix J - Geotechnical Assessment [↓](#)
- Appendix 16 - Appendix K - Landscape Assessment [↓](#)
- Appendix 17 - Appendix K-1 Further Information Response Mike Moore Landscape [↓](#)
- Appendix 18 - Appendix L - Land Productivity Report [↓](#)
- Appendix 19 - Updated Proposed New Industrial Zone [↓](#)
- Appendix 20 - Further Information Request [↓](#)
- Appendix 21 - Further Information Request Response [↓](#)
- Appendix 22 - Applicants Assessment Under Clause 3.6(5) of NPS-HPL [↓](#)
- Appendix 23 - Central Otago District Council Three Waters Advice [↓](#)
- Appendix 24 - Peer Review of PSI [↓](#)
- Appendix 25 - 001 Submission - Ian Mair [↓](#)
- Appendix 26 - 002 Submission - Sonja Collier [↓](#)
- Appendix 27 - 003 Submission - Ian Gray [↓](#)
- Appendix 28 - 004 Submission - Central Otago District Council [↓](#)
- Appendix 29 - 005 Submission - New Zealand Transport Agency [↓](#)
- Appendix 30 - 006 Submission - Peter Gilmore Young [↓](#)
- Appendix 31 - 007 Submission - Greg Rabbitt and Helen Axby [↓](#)



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Central Otago District Plan

Plan Change 23 – Hartley Road Partnership

Section 42A Report – Report on Submissions and Further Submissions

Prepared by
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Planning Officer

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List of submitters addressed in this report:

Submitter Ref	Further Submitter	Submitter Name	Abbreviation
001		Ian Mair	
002		Sonja Collier	
003		Ian Grey	
004		Central Otago District Council C/- Gordon Bailey	Mr Bailey
005		New Zealand Transport Agency Waka Kotahi	NZTA
006		Peter Young	
007		Greg Rabbit and Helen Axby	

Where no abbreviation is given, the last name(s) of submitters will be used as references.

Abbreviations used in this report:

Abbreviation	Full Text
Council	Central Otago District Council
the Plan	Central Otago District Plan
IMP	Iwi Management Plan
NPS-FM	National Policy Statement for Freshwater Management 2020
NPS-HPL	National Policy Statement for Highly Productive Land 2020
NPS-IB	National Policy Statement for Indigenous Biodiversity 2023
NPS-UD	National Policy Statement for Urban Development 2022
ORPS	Otago Regional Policy Statement 2019
PORPS	Proposed Otago Regional Policy Statement 2021
PC23/Plan Change 23	Plan Change 23 to the Central Otago District Plan
RMA	Resource Management Act 1991
the Request	The Request for a Change to the Operative Central Otago District Plan, including Appendices A to L
VSP	Vincent Spatial Plan

1. Purpose of Report

- [1] This report is prepared under s42A of the RMA in relation to Plan Change 23 to the Central Otago District Plan. The purpose of this report is to provide the Hearings Panel with a summary and analysis of the submissions received on this plan change, to make recommendations in response to those submissions, and provide a statutory assessment of the request, to assist the Hearings Panel in evaluating and deciding on the submissions. This report relates to all aspects of PC23.
- [2] The analysis and recommendations have been informed by the contents of the s32 report prepared in support of the plan change by Messrs Peter Dymock and Duncan White on behalf of the applicant, and the submissions lodged by the public. The s32 report and all other material supporting the plan change is hereafter referred to as "The Request".
- [3] The conclusions reached and recommendations made in this report are not binding on the Hearings Panel. It should not be assumed that the Hearings Panel will reach the same conclusions having considered all the information in the submissions and the evidence to be brought before them, by the requestor and submitters.

2. Qualifications and Experience

- [4] My name is Adam Vincent. I am a Planning Officer employed by the Central Otago District Council. I hold a Bachelor of Urban Planning with Honours from the University of Auckland and a Graduate Diploma in Law from the University of Waikato. I am a full member of the New Zealand Planning Institute.
- [5] I have seven years' planning experience working in local government in the Central Otago district. My experience includes processing resource consent applications and notices of requirements for territorial authorities, assisting in the development of spatial plans for different catchments in the Central Otago district, and assessing proposed changes to the Central Otago District Plan.
- [6] Although this is a Council hearing, I confirm that I have read the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023¹ and that I have complied with it when preparing this report. I have also read and am familiar with the Resource Management Law Association/New Zealand Planning Institute "Role of Expert Planning Witnesses" paper and the NZPI code of ethics². I confirm that I have considered all the material facts that I am aware of that might alter or detract from the

¹ Available from <https://environmentcourt.govt.nz/assets/Practice-Note-2023-.pdf>

² Available from <https://planning.org.nz/about-nzpi/code-of-ethics>

opinions that I express, and that this evidence is within my area of expertise, except where I state that I am relying on the evidence of another person.

- [7] Having reviewed the list of submitters I advise that the submission from Mr Bailey, being from another department within CODC, could give the impression of their being a conflict of interest due to the working relationship between myself, Mr Bailey and the staff under his management. In order to manage this potential conflict, I have not discussed the request with Mr Bailey, or any of his subordinates or superiors. I have relied solely on the content of his submission and will give it only the weight due to it as the arm of CODC responsible for the reserve land in its jurisdiction. Where I seek clarity or further consideration from Mr Bailey, as with any other party to the request, this will be outlined in my s42A report.
- [8] Overall, I consider that this potential conflict can be adequately managed and that it would not impede me from providing independent advice to the Hearings Panel.

3. Scope and Format of Report

- [9] This report considers the submissions that were received in relation to PC23. It includes recommendations to either retain provisions without amendment, delete, add to or amend the provisions, in response to these submissions. It also assesses the merits of the request against relevant statutory and non-statutory documents. All recommended amendments are shown by way of ~~strikeout~~ and underlining in Appendix 1 to this Report. Footnoted references to the relevant submitter(s) identify the scope for each recommended change.
- [10] The assessment of submissions generally follows the following format:
- a. An outline of the relevant submission points
 - b. An analysis of those submission points
 - c. Recommendations, including any amendments to plan provisions (and associated assessment in terms of s32AA of the RMA where appropriate and not previously undertaken in point b).
- [11] In preparing this report I have:
- visited the site that is the subject of the PC23 Request and the surrounding areas, including both the immediately surrounding land, and the wider township of Clyde;

- reviewed the original plan change request (Request), as well as the updates to the Request (Updated Request) provided by the applicant on 01 October 2024 in response to a request for further information;
- read and considered all the submissions received on PC23;
- reviewed the statutory framework and other relevant planning documents; and
- reviewed, and where necessary relied on, the technical comments provided by other experts on this plan change.

[12] This report effectively acts as an audit of the information lodged with the Request (including as amended through the Updated Request) prepared by Pattersons Ltd on behalf of Hartley Road Partnership Ltd. A full copy of the plan change request, submissions, summary of submissions and other relevant documentation can be found on the Central Otago District Council consultation platform at <https://www.codc.govt.nz/publications/plans/2district-plan/05-district-plan-changes/plan-change-23-hartley-road-partnership#toc-link-1>

[13] As such, this report seeks to provide as little repetition as possible and accepts parts of the Request where stated. If a matter is not specifically dealt with in this report, it can be assumed that there is no dispute with the position set out in the Request.

[14] Clause 16(2) of the RMA allows a local authority to make an amendment to a proposed plan without using a Schedule 1 process, where such an alteration is of minor effect, or may correct any minor errors. Any changes recommended under clause 16(2) are identified as such in my report.

4. Plan Change Overview

[15] Plan Change 23 proposes to rezone part of a property on the corner of State Highway 8 and Springvale Road, legally described as Lot 1 DP 600773 (The site) from Rural Resource Area to Industrial Resource Area. The remainder of the site would remain in the Rural Resource Area, as shown in Figure One.



Figure One: The site showing the proposed new zoning.

- [16] The request also proposes the following changes to the text of Sections 09 and 12 of the District Plan in order to incorporate site specific requirements regarding access to State Highway 8 and provision of landscaping strips:

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).

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.

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 would a restricted discretionary activity under existing Rule 9.3.3.

- [17] With the exception of the above changes, the provisions of Section 09 of the District Plan would apply to the area of land proposed to be incorporated into the Industrial Resource Area. Section 04 of the District Plan would continue to apply to the land remaining in the Rural Resource Area.
- [18] Generally speaking, the Industrial Resource Area is a highly permissive zone, with few limitations on the types of activities that can occur on land as a permitted activity, subject to compliance with permitted activity standards related to building size, noise, screening, signage, loading, vehicle parking and lightspill. Under the District Plan, the zone could provide for a range of light or heavy industry, logistics, commercial, offices, residential activities or recreation activities, among others, to occur on the site if the Request is accepted. It would also permit farming activities, including intensive farming. Land uses that require resource consent are limited to retail activities not associated with an industrial activity or that are of a larger scale, activities that require an offensive trade licence under the Health Act 1956, activities that require a permit under the Crown Minerals Act 1991, and breaches of permitted activity standards.
- [19] Several plans provided with the Request show a subdivision layout. The requestor has emphasised that this is one potential option for a subdivision of the site. They do not request that this subdivision layout be incorporated into the District Plan, and they have not applied for resource consent to subdivide the land at the time of writing. I will only have regard to any such plans insofar as they show one possible future state of the land, if Council accepts the proposed plan change.

5. Procedural Matters

- [20] PC20 was notified on 16 November 2024, with submissions closing on 17 January 2025. The summary of submission was notified on 08 February 2025 and the further submission period closed on 21 February 2025. Seven original submissions and no

further submissions were received. All submissions relate to the plan change, were received within the submission period and have all the required information to be considered a valid submission.

6. Statutory Framework

[21] The assessment under the RMA for this Plan Change includes whether:

- it is in accordance with the Council's functions (s74(1)(a));
- it is in accordance with Part 2 of the RMA (s74(1)(b));
- it will give effect to any national policy statement or operative regional policy statement (ss 75(3)(a) and (c));
- the objectives of the proposal are the most appropriate way to achieve the purpose of the RMA (s32(1)(a));
- the provisions within the plan change are the most appropriate way to achieve the objectives of the proposal (s32(1)(b)).

[22] In addition, assessment of the plan change must also have regard to:

- any proposed regional policy statement, and management plans and strategies prepared under any other Acts (s74(2));
- the extent to which the plan is consistent with the plans of adjacent territorial authorities (s74 (2)(c)); and
- in terms of any proposed rules, the actual or potential effect on the environment of activities including, in particular, any adverse effect (s76(3)).

[23] The assessment of the plan change must also take into account any relevant iwi management plan (s74(2A)).

[24] Specific provisions within the RMA and in other planning documents that are relevant to PC23 are set out in the updated s32 Report.³ These documents are discussed in more detail within this report where relevant to the assessment of submission points.

[25] The assessment of submission points has also been undertaken in the context of the s32 report prepared for PC23. All recommended amendments to provisions since the

³ Refer to Sections 6 to 10 of the updated s32 Report.

initial s32 report evaluation was undertaken must be documented in a subsequent s32AA evaluation and this has been undertaken, where required, in this report.

7. Assessment of Submissions

Overview of Submissions

- [26] Seven submissions were received on PC23. No further submissions were received. Of the submissions, none supported the plan change, three were neutral, and four were opposed.
- [27] Two submissions requested specific changes be made to the proposal. The submission from Mr Bailey requested provisions be included that give certainty that the buffer plantings and boundary fences proposed to be required along the Clyde Cemetery will be retained in perpetuity and provisions, such as restrictions on noise during interments, to ensure dignified privacy in maintained for mourners using the cemetery.⁴ The submission from NZTA requested that provision be made to avoid structures or paved areas in the landscaping strip, avoid vegetation in the landscaping strip that would grow to shade the highway between 10:00 and 14:00 hours on the shortest day of the year, include specific upgrade requirements for the State Highway 8 / Springvale Road intersection, and require investigation into whether the existing underpass beneath State Highway 8 will require upgrading or additional signage to serve as a pedestrian/cycle access to the site, prior to its development.⁵
- [28] Submissions in opposition identified effects on residential amenity for nearby residents, such as through noise, pollution and loss of property values, effects on the appearance of the entrance to Clyde, traffic congestion and questioned whether the land was required for industrial purposes, referencing the presence of available industrial land in Alexandra.

Structure of Report

- [29] For ease of analysis, I consider that the key matters either raised by submitters, or necessary to be considered in ensuring that the Council's statutory functions and responsibilities are fulfilled, are:
- Character Effects (For example visual effects, noise, residential amenity)
 - Effects on Clyde Cemetery
 - Effects on Roothing Network

⁴ #004 – Mr Bailey on behalf of CODC

⁵ #005 – NZTA

- Need for Industrial Land in this Location
- Availability of Utilities
- Soil Contamination and Geotechnical

8. Character Effects

Submissions

[30] Ms Collier considers that the proposal would affect the amenity of the area, through aspects such as noise and vehicle pollution. She submits that this would then affect house prices nearby.⁶ Mr Young considers that it is important to retain the unique character of Clyde.⁷ Mr Rabbitt and Ms Axby consider that the proposal would create an eyesore at the entrance to Clyde.⁸

Discussion

[31] The site is currently largely undeveloped, and presents a rural character, in a wider context characterised by a mixture of urban and rural development, bisected by State Highway 8. For the purposes of this assessment, I adopt the site and area description and description of landscape values of Mr Moore in his landscape assessment provided in support of the application.⁹

[32] Currently State Highway 8 forms a distinct edge to the urban township of Clyde and the more rural areas beyond. I do accept the requestor's position that this is tempered somewhat by the presence of several large industrial buildings around the former Clyde Railhead. However, these existing buildings are also relatively spread out and are on large lots. This helps to soften their visual impacts relative to the density of built form that may occur in a contemporary, dedicated industrial zone, in my opinion. Therefore, they are not a direct comparison. This limits the utility of this argument to support the request.

[33] The requestor proposes provisions that would encourage a landscaped buffer between any future development of the land for industrial purposes, and surrounding roads and land uses. This is worded similarly to requirements for landscaping along the Old Salyard Road industrial development in Cromwell required by Rule 9.3.6.iv.c, which requires a landscaped buffer be maintained between industrial lots and State Highway 6 to provide visual enhancement or screening.

⁶ #002 – Collier

⁷ #006 – Young

⁸ #007 – Rabbitt and Axby

⁹ Request Appendix K, at pages 3-5

[34] I note that the Courts have concluded that effects on land values should not be considered direct environmental effects in themselves. Instead, they are a way of showing that an effect is occurring.¹⁰ In order to avoid duplication of consideration of adverse effects, I will not be considering changes in property values to be a separate effect on the character of the area.

[35] In terms of noise effects for Clyde township residents, there would be two primary sources of noise if the request were approved. State Highway 8 is the current primary source of artificial noise in the current environment, consisting of irregular vehicle noise across the day, increasing during peak traffic times. The proposal would add new sources of industrial noise, which would likely be a more consistent source of noise during normal business hours, but also with occasional spikes in noise level. Rule 9.3.5.iii.a would require the following noise limits be adhered to at any point within the Clyde residential area:

On any day	7:00am - 10:00pm	55 dBA L ₁₀
	10:00pm - 7:00am the following day	45 dBA L ₁₀
		70 dBA L _{max}

[36] I note that this is exactly the same noise limit as applies in rural areas under Rule 4.7.6E.a of the Plan. Given this, I anticipate that noise levels from a permitted rural use of the site would not be substantially different under either its current zoning, or the proposed industrial zoning. However, the characteristics of that noise would likely change. For example, it would more likely be year round, as opposed to seasonal, more concentrated to during “business hours”, and have different tonal qualities.

[37] As it approaches the bottom of the Clyde Hill, State Highway 8 has been built up some 3-5m above natural ground level as it passes the site. I consider that this would help to block some of the noise from an industrial use of the site, reducing its apparent levels, particularly relative to road noise, and helping to block some of the different potential tonal qualities of that noise. I agree with the submitters that development resulting from the request would likely increase noise levels relative to those that currently exist. However, relative to the noise levels permitted by the district plan, this is not anticipated to notably change, and I consider that other effects related to the changing character of permitted noise would be sufficiently mitigated by the raised position of State Highway 8 helping to block some of that noise that I do not consider these effects to be significant.

[38] Proposed Rule 9.3.6.iv.d would require a 10m wide landscaped buffer be provided along the cemetery reserve, Springvale Road and the State Highway. A breach of this rule would be a restricted discretionary activity with Council’s discretion limited to, among

¹⁰ See, for example, *Giles v Christchurch City Council* [2000] ELHNZ 296 at [59].

other matters, the effect on amenity values of adjoining properties and adjoining resource areas. This is then supported by Policies 9.2.2 and 9.2.3, and Objective 9.1.2, which require the effects of industrial activities be managed so that, among other things, appropriate separation and screening is provided for adjoining resource areas and the effects on neighbouring areas from noise, odour, dust and lightspill are avoided, remedied or mitigated. At the time of subdivision, Council would retain control over the mitigation of adverse effects on adjoining areas of public open space, among other things, under Rule 9.3.2.i.

[39] Proposed Rule 9.3.6.iv.d does not give a purpose for the required landscaping.¹¹ Nor does it require any specific density of plantings. Therefore, I question whether compliance with the rule as proposed would be sufficient to achieve consistency with Policies 9.2.2 and 9.2.3 and the objectives of the requestor. For argument's sake, a landowner could reasonably argue that simply providing a grassed lawn would comply with this rule based on the definition of "landscaped" in the District Plan¹². Yet, such landscaping would provide none of the benefits of screening the site advanced by the requestor.

[40] I consider that, in order for the proposed Rule 9.3.6.iv.d to be effective and achieve both the objectives of the request, and the objectives of the District Plan, more detail would be required regarding the exact nature of landscaping required to comply with the rule. To this point, I would anticipate that the requestor and submitters (Particularly Mr Bailey and NZTA, who directly discussed landscaping in their submissions) would provide their own thoughts on what level of landscaping they consider would be necessary to manage the effects of the proposal and achieve the objectives of the plan change.

[41] Landscaping and buildings would change the currently low intensity development pattern on this side of State Highway 8, noticeably changing the character of the area. While the proposal would cause development to jump the highway, I concur with Mr Moore that it will, visually, form a logical extension to the Clyde urban area. It may be preferable to keep State Highway 8 functioning as a hard edge to the town. However, as a result of Plan Change 19, the land between the highway and the Clutha River has now all been zoned for different urban purposes, leaving limited room for further expansion. In this context, I consider that changing the zoning of the land would not significantly adversely affect the wider visual character of the township. I concur with Mr Moore that appropriate landscaping, supported by appropriately worded District Plan standards, will be sufficient to manage these effects to acceptable levels.

¹¹ As a comparison, Rule 9.3.6.iv.c specifies that the landscaping required by that rule must provide opportunities for visual enhancement or screening. As a permitted activity standard, it is still not ideally worded, in my opinion, but it does at least set out what the required landscaping is intended to achieve.

¹² "Landscaped" in the District Plan means laid out with features such as trees, shrubs, lawns, paving, walls and screens in keeping with the surrounding area so as to enhance the amenities of the site and surrounding area.

[42] In terms of the longevity and ongoing maintenance of any landscape screening or wall raised by Mr Bailey,¹³ I consider that this can adequately form part of a condition of consent, per the proposed drafting of Rule 9.3.6.iv.d. Additionally, in the event that a landowner let a landscaped area fall into disrepair or removed it (Regardless of any condition of consent requiring they be maintained in perpetuity, which would be needed to comply with the rule), they would be in breach of proposed Rule 9.3.6.iv.d. In order to ensure this, if the plan change is approved, I recommend this rule be further amended to specify that it relates to the Clyde Industrial Precinct, for clarity, and make a consequential change to the planning maps to refer to the site as the Clyde Industrial Precinct. This would mean the provisions continue to have effect throughout the lifespan of the precinct. Otherwise, I consider that the proposed rule 9.3.6.iv.d as drafted would address this particular concern of Mr Bailey.

Conclusions

[43] I recommend that the wording of proposed Rule 9.3.6.iv.d be re-worded as necessary to improve certainty that landscaping will have the effect intended by the requestor and desired by submitters. I consider that the exact wording can be discussed at or prior to the hearing. However, I have drafted the following alternative wording for the rule as a possible starting point:

- d. *Within Lot 1 DP 600773 the proposed 'Clyde Industrial Precinct', a landscaped strip with a minimum width of 10 metres shall be provided and maintained 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 or prior to any development of the site and shall create the opportunity for landscaping to provide visual enhancement and screening. The landscaped strip must not be paved or have any structures erected on it. Landscaping must form a visual screen of the subdivision or development that, at a minimum, meets the following performance requirements:*
- 1. In relation to the Clyde Cemetery, must include species that will achieve a minimum height of 4.0m when mature and must be maintained with sufficiently dense plantings that, when mature, they will block direct line of sight measured horizontally at any point from ground level to 1.8m above ground level between the cemetery and industrial development within the Clyde Industrial Precinct.*
 - 2. In relation to State Highway 8 and Springvale Road, must be maintained to a height that avoids shading of the carriageway of State Highway 8 between 10:00 and 14:00 hours on the shortest day of the year."*

¹³ #004 - Bailey

- [44] For clarity, the 4.0m minimum mature height in my suggested matter 1 is arbitrary, but would encourage the use of taller species that would help to break up the views of taller buildings. However, the intent is not to require all plants be able to grow to 4m high. 1.8m was chosen as the reference height for visibility through the landscaping based on the eye level of a reasonably tall adult, reflecting Mr Bailey's concerns about privacy.
- [45] Matter 2 is taken in full from NZTA's submission on the request. Limitations of the above suggestions include no requirements for particular densities of vegetation other than as needed to block horizontal line of sight in relation to the cemetery. For example, the above wording would not preclude landscaping along the highway from being largely grass, provided some level of visual enhancement was afforded. I have done this in order to avoid inadvertently proposing a standard that would conflict with the submission of NZTA. I accept that they may not be sufficient to fully address the concerns of Mr Bailey or the Clyde resident submitters, and invite comment from all parties.
- [46] I consider that policies 9.2.2 would remain adequate to support these proposed rules. It seeks to ensure that industrial activities avoid, remedy or mitigate their effects on nearby land uses through actions such as appropriate screening.
- [47] Subject to the above, I consider that development resulting from the request would not have character effects that were unacceptable, or that could not be managed to acceptable levels.

9. Effects on Clyde Cemetery

Submissions

- [48] Mr Bailey's submission focused on the proximity of the Clyde cemetery. He considers that users of the cemetery are entitled to dignified privacy and is concerned that the landscape buffer, on its own, may not deliver this in perpetuity as proposed. He considers that there should be additional certainty in the planning provisions that the proposed buffer plantings and boundary fence will be maintained in perpetuity, and that there be further provisions for ensuring dignified privacy, including potential for noise or activity restrictions during funeral services.¹⁴

Discussion

- [49] I consider that the cemetery would be considered a sensitive activity, particularly from noise, which may disrupt funerals and mourning. In my experience, both are typically sombre and reasonably quiet affairs that may easily be disrupted by noise, vibration or onlooking. I concur with the concerns of Mr Bailey that noise from future development under the proposed industrial zoning may adversely affect activities occurring in the

¹⁴ #004 – Bailey.

cemetery if not appropriately managed. Noise experienced at the boundary of the cemetery would be subject to Rule 9.3.6.iii.a of the Plan, which requires all activities comply with the following limits at any point within the Industrial Resource Area:

On any day	7:00am to 10:00pm	65 dBA L ₁₀
	10:00pm to 7:00am the following day:	45 dBA L ₁₀
		85dBA L _{max}

- [50] The remainder of this rule relates to residential zones, so is not of particular relevance to the cemetery. For the sake of comparison, under the current rural zoning, up to 55dBA L₁₀ or 70dBA L_{max} could be generated from permitted activities on the site, measured at the boundary of the Clyde residential area (But not in relation to the cemetery), between 7am and 10pm. 65dB would equate to a rough doubling of the perceived loudness of permitted noise levels compared to those that apply at present. However, the two standards measure noise from different points, so they cannot easily be compared. Unlike the residential areas of Clyde, the cemetery is located at the same elevation as the site, with no changes in topography to help block noise (Either from the request site or existing sources of noise generation). In practice, I consider that development resulting from the request would increase the noise likely to be experienced by users of the cemetery, particularly relative to the current use of the land. Current sources of noise are predominantly vehicles using Springvale Road and State Highway 8.
- [51] I consider that the daytime and maximum noise limits would be most relevant to the use of the cemetery. No additional noise restrictions above Rule 9.3.6.iii have been proposed in the request. The District Plan does not currently regulate vibration as an independent activity. The request proposes that onlooking be managed through building setbacks and landscaping along the site and the cemetery. Mr Bailey has not specified how they would prefer effects on the cemetery to be managed.
- [52] When measuring noise for the purposes of Rule 9.3.6.iii, dBA means the noise level weighted to consider the range and sensitivity of human hearing. L₁₀ means that the specified decibel level cannot be exceeded for more than 10% of the time of the measurement period (For example, 6 minutes across an hour). L_{max} levels cannot be exceeded at any point.¹⁵
- [53] Examples of noise at or approaching 65dBA can include an air conditioning unit at 1-2m, inside a large business office or restaurant, a sewing machine, a normal conversational level, or background music. 85dB noise levels could be similar to being next to a ringing alarm clock or the close passing of a large diesel truck travelling at

¹⁵ Standards New Zealand (03 March 2016) *Construction Noise: Know the Limits*. Retrieved from <https://www.standards.govt.nz/news-and-updates/construction-noise-know-the-limits>.

about 65km/hr.¹⁶ In an industrial area, this could be caused by activities such as use of power tools, banging of materials together, for example when loading or unloading a truck, music, or motion alarms on vehicles operating outdoors.

- [54] Based on a site visit, the cemetery mostly experiences road noise from State Highway 8 and Springvale Road. During my site visit (Early afternoon on a weekday in early autumn. Cloud cover was patchy, with light, gusty wind), other than these noise sources, the dominant sounds I observed were from wind and wildlife. Other existing more seasonal, sources of noise in the area could include frost protection or bird scaring associated with cherry orchards being established to the north, other noises associated with rural production on nearby rural lots, and noise from operations at Contact Energy's depot.
- [55] The proposed requirement for a landscaping buffer would encourage noise generating activities to locate away from the boundary with the cemetery. However, I consider that an 85 dBA noise peak could impact some cemetery activities by being noticeably higher than current or anticipated ambient noise levels. Such disruptions from noise generated in compliance with Rule 9.3.6.iii.a would be relatively short term in nature, but would adversely affect people visiting the cemetery. Mr Bailey's submission did not indicate what noise level he considers would be acceptable to manage these effects. I invite Mr Bailey to suggest a permitted activity noise standard that he considers would be sufficient to manage disruption to cemetery goers at or prior to the hearing, for consideration. The requestor has not considered noise effects on the cemetery, other than to say noise would be adequately governed by existing permitted activity standards.¹⁷ Given the potential effects identified by Mr Bailey and the primacy put on providing a sense of privacy and quiet to mourn in a cemetery, I consider it reasonable that a reduced noise standard be applied in order to reduce effects on users of the Clyde Cemetery. I invite Mr Bailey and the applicant to provide further comment on this at or prior to the hearing.
- [56] In terms of limitations on activities or noise during funeral services, this is similar in theory to the conditions of the resource consent for the Highlands Motorsport Park in Cromwell, who need to cease certain operations during the times burials are scheduled in the Cromwell Cemetery as a condition of their consent for, among other things, a breach of permitted Rural Resource Area noise standards.¹⁸ However, in practice, implementation of this type of regime for development anticipated by the plan change

¹⁶ See, for example, IAC Acoustics (n.d.) *Comparative Examples of Noise Levels*, retrieved from <https://www.iacacoustics.com/blog-full/comparative-examples-of-noise-levels>, and Yale Department of Environmental Health and Safety (n.d.) *Decibel Level Comparison Chart*, retrieved from <https://ehs.yale.edu/sites/default/files/files/decibel-level-chart.pdf>.

¹⁷ Duncan Whyte, Request Appendix D, at Section 9.0.

¹⁸ Resource consent RC 150225. Condition 49 of this consent requires any Tier Two activity, of which there can be up to 16 a year, and do not have a daytime noise limit for their operation, be suspended for the period of the burial and half an hour either side, where the motorsport park operator receives at least two days' notice of the burial from the funeral director.

could be tricky to manage and enforce. The number of parties involved in this case would likely be significantly more than those involved in Cromwell. In addition, the Highlands consent only seeks to manage the effects of a limited number of specific activities per year, where the consent holder does not otherwise have to comply with any noise limits, whereas Mr Bailey's submission seems to suggest requested limitations on regular day to day activities that would already be bound by Rule 9.3.6.iii.a. I consider that specific limitations in a similar vein to those imposed on Highlands could impose a regulatory and compliance cost for both Council and future that outweighs the potential benefits to cemetery users in this context. I do not consider any additional limitations on specific activities to be necessary. Instead, I consider it more appropriate to rely on a permitted activity noise level to manage effects on users of the Clyde cemetery.

[57] I consider that the construction or otherwise of the stone wall identified in the cemetery extension development plan provided by Mr Bailey is largely immaterial to Council's consideration of this plan change request. Any boundary fence or wall would typically be a permitted activity in any resource area, and is subject to the provisions of the Fencing Act 1978. No details about the intended wall are provided in the cemetery extension development plan, other than that it would be stone. However, assuming they are built to mirror the existing walls around the cemetery, I consider that it would not provide significant visual or acoustic screening due to the existing wall being able to be looked over by an adult. It is not clear to me how such a fence would help provide privacy for users of the cemetery.

[58] Mr Moore has assessed the potential visual effects of the proposed change from the Clyde Cemetery and considers that the proposed landscaping strip would provide an adequate visual screen of the site. While not guaranteed, it can be assumed that a visual screen of possible industrial development would likely also limit opportunities for overlooking or loss of actual or perceived privacy. Given no plantings are currently proposed, it is impossible for Council to be satisfied that any given screening will be adequate. Therefore, it is necessary for Council to be satisfied that the proposed rules regarding landscaping will ensure the desired effect. This question has already been considered in Paragraphs [38]-[40] of my assessment. I consider that more specificity would be required in order to have an enforceable, legally valid, permitted activity standard that gives the certainty desired by Mr Bailey.

Conclusions

[59] On the whole, I consider that effects on the amenity of the Clyde Cemetery can be adequately managed through permitted activity standards, potentially including through amended permitted noise standards. As a possible starting point, I consider that Rule 9.3.6.iii.a could be amended as follows:

- a. All activities shall be conducted so as to ensure the following noise limits are not exceeded at any point within any Industrial Resource Area,

On any day	7:00am - 10:00pm	65 dBA L10
	10:00pm - 7:00am the following day	45 dBA L10
		85 dBA Lmax

Provided that the following noise limits shall not be exceeded at any point within a Residential Zone [or at the boundary of Designation D68 \(Clyde Cemetery\)](#):

On any day	7:00am - 10:00pm	55 dBA L10
	10:00pm - 7:00am the following day	45 dBA L10
		70 dBA Lmax

Provided that the above noise limits shall not apply to any temporary activity (as defined).

- [60] I consider that the above would roughly half the potential maximum apparent noise level within the cemetery caused by activities within the request site. This would serve to reduce the effects on cemetery users due to lower volume noise typically being less disruptive, while not being an undue restriction on industrial activities, given the societal importance placed on being provided reasonably quiet, private spaces to mourn departed individuals. I invite the requestor and Mr Bailey to comment on whether they consider this to be acceptable, or whether another alternative should be considered.
- [61] I consider that policy 9.2.3 would remain adequate to support this proposed rule. It seeks to ensure that industrial activities taking steps to manage noise effects.
- [62] I also recommend changes be made to those proposed by the requestor in order to provide more certainty that a certain level of landscaping will be achieved. Possible changes have been outlined in Paragraphs [43]-[46].

10. Effects on Roading Network

Submissions

- [63] Ms Collier, and Mr Rabbitt and Ms Axby consider that the proposal would create safety concerns at the intersection of State Highway 8 and Springvale Road, with additional congestion and potential for accidents.¹⁹ NZTA requests the proposal be amended to specify that no vehicle or other access is permitted to State Highway 8, to the site, paving or structures in the landscaping strip, avoid the planting of vegetation that would shade

¹⁹ #002 – Collier, #007 – Rabbit and Axby

the State Highway 8 carriageway or the intersection with Springvale Road between 10:00 and 14:00 on the shortest day of the year, specify exactly what upgrades are required for the State Highway 8 / Springvale Road intersection, and require investigation of whether upgrades would be required to the existing State Highway 8 underpass to let it function as a pedestrian/cycle connection from Clyde.²⁰ NZTA's proposed additional upgrades include the following:

- An auxiliary left turn lane for traffic approaching the intersection from the north-west to turn off the highway
- A widened shoulder adjacent to the auxiliary left turn lane extending into Springvale Road to provide space for cyclists to turn left outside the left turn lane.
- An advice note specifying that the final design of the intersection will need to be approved by NZTA via a corridor access requires under the Government Rooding Powers Act 1989 before construction.

Discussion

[64] In terms of NZTA's requests that the proposed Rule 9.3.6.iv be amended to preclude paving or structures, and to require any vegetation not shade the State Highway on the shortest day of the year, I consider it to be reasonable, and within the intended purpose of the landscaping strip to not have buildings present. NZTA appears to propose a preclusion on paving as a way to preclude creep of industrial related activities into the buffer. Given the intended purpose of the landscaping strip, I consider this to be appropriate.

[65] I agree with NZTA that vegetation that shades the State Highway 8 carriageway can have an adverse effect on its safe and efficient operation, particularly in winter, where there is a risk of ice forming on the carriageway and not being cleared by direct sunlight. Given this risk, I accept the proposed addition to Rule 9.3.6.iv to specify that the vegetation must not shade the highway. However, as proposed by NZTA, the rule would preclude any vegetation that shaded any part of the legal road, even where that shade would not affect the carriageway and, hence, be less likely to create a hazard for road users. In order to avoid a situation where no vegetation could be planted close to the boundary of the highway without requiring resource consent, potentially limiting the effectiveness of the vegetation as a visual screen, I recommend that this be further amended to specify that vegetation must not shade the State Highway 8 carriageway.

[66] In terms of further amending Rule 12.7.1.iii.h to specify that no vehicle or other access is permitted to State Highway 8 from the site, I consider this change to largely be semantic in nature. As proposed, the rule would allow no access of any sort. All the

²⁰ #005 - NZTA

changes proposed by NZTA would achieve would be to make this more explicit by specifying no vehicle or any other type of access is to be achieved. I consider that it could be clearer for readers of the rules to have this specified. However, I do not consider that it would notably change the effect of the proposed rule. Given this, I recommend that this part of NZTA's submission be adopted as a minor change if the plan change is approved.

- [67] As a minor change, I recommend that the access standard for Springvale Road be split into its own provision. This would make it clearer to a reader that the standards relate to different roads, and place different requirements on development within the request site. Instead of requiring there be no direct access to Springvale Road, I also recommend this be changed to require no more than one point of access. This would allow for a single point of access as a permitted activity. This access could be either a road intersection if the land was subdivided, or a vehicle crossing if the site was developed without a subdivision. This would keep the same intent as the standard proposed by the requestor, but avoids a scenario where the landowner requires resource consent if the Clyde Industrial Precinct is developed for an otherwise permitted activity instead of being subdivided, solely because they have a single driveway directly onto Springvale Road (instead accessing from a subdivisional road), and no other practicable options for access. Springvale Road is classified in Schedule 19.7 of the District Plan as a rural arterial road. Therefore, this standard could be kept under Rule 12.7.2.iii. The activity status for a breach can remain the same, and I consider that Objective 12.3.1 and Policy 12.4.1, which together require safe and efficient access points to the roading network to be adequate to support this rule without alteration. Having multiple access points on an arterial road in close proximity to a significant intersection between two arterial roads may not constitute safe and efficient access to the roading network.
- [68] In terms of further amending Rule 12.7.1.iii.i, NZTA recommends an auxiliary left turn lane be required to be installed for southbound traffic on State Highway 8 turning left space to decelerate and make the turn without disrupting traffic continuing south. Mr Carr notes that there is no formal left turn lane currently. However, there is a reasonably wide shoulder approaching the intersection, which is commonly used as a turning lane in practice.²¹ Mr Carr appears to consider that a left turn lane would be warranted,²² but the request leaves it vague as to who would be responsible for constructing the lane. Noting the submission from NZTA, the status of State Highway 8 as a limited access road, and NZTA's status as the road control authority for the road, I consider that more weight should be given to the position of NZTA. Given they have specified particular upgrades that would be required to accommodate additional traffic directly attributable to future development that would be enabled by the request, I recommend Council adopt NZTA's desired further changes to Rule 12.7.1.iii.i, if it were to approve the request.

²¹ Andrew Carr, Request Appendix G, at 3.1.9.

²² Request Appendix G at 7.2.1.

- [69] The proposed wording of Rule 12.7.i.iii.i in the request ties the required upgrades to be prior to subdivision and industrial development. This timing could be problematic as the use of “and” requires both criteria be fulfilled before any upgrades are required. This means that the landowner at the time of subdivision could feasibly argue that, because no industrial development had happened at the time of subdivision, they were not required to upgrade the intersection under the rule. Alternatively, if the site were to be developed for industrial use without requiring a subdivision, the landowner could argue that, because they were not subdividing, the rule was not triggered, and the access would not need to be upgraded. To address this possibility, consideration should be given to replacing “and” in this rule with “or”.
- [70] Replacing “and” with “or” would have the effect of requiring any development of the site upgrade the intersection in order to be able to be considered a permitted activity. This would occur whether the development in itself would warrant and upgrade or not, for example if only a small scale industrial storage facility were to locate to the site in advance of, or in lieu of, any other development. This could impose a high compliance cost on an activity that may not warrant it. The implications of using “and” in the rule have been outlined in the previous paragraph.
- [71] On balance, I consider that the threshold should be either subdivision, or industrial development occurring on the site. Assuming similar levels of intensification in both scenarios, similar levels of traffic could be anticipated, with a similar effect. In principle, I consider the interests of preserving the efficient function of State Highway 85 to outweigh the costs to the developer from having to upgrade the intersection, particularly if they choose to not fully utilise the land. If a specific development results in traffic generation that is low enough that upgrades are not warranted, this can be considered through the resource consent process under Rule 12.7.1.ix.
- [72] NZTA also request that investigation occur in relation to whether the Daphne Hull Underpass requires upgrading, for example sealing of its eastern approach, installing lighting or increasing signposting, to accommodate additional cycle and pedestrian movements. I note that the Department of Conservation, who owns the land at the eastern approach to the underpass, has not submitted on the request. As an issue of natural justice, I am loathe to recommend imposing a requirement through the District Plan that could impact, or require the engagement of, a third party that is not a party to this proceeding. I consider that the use of, and any upgrades to, the underpass can reasonably be considered either at the time of subdivision (As part of Council’s exercise of its control over the provision of access), or in consultation with landowners if the land is developed without subdivision. This would not require regulation through rules in the District Plan.
- [73] NZTA, as the road control authority for State Highway 8 has proposed changes to the plan change that, in their opinion, would facilitate the safe and efficient operation of their highway. Given their status as the road control authority, I consider this to be sufficient

to address the concerns about the safe and efficient operation of State Highway 8 and the intersection with Springvale Road identified by Ms Collier, and Mr Rabbitt and Ms Axby. That leaves consideration of effects on the wider roading network, particularly Springvale Road, also raised in submissions.

- [74] In relation to effects on the wider roading network, the request would increase vehicle movements along nearby roads. In reliance on the assessment of Mr Carr, I am comfortable that this increase in traffic will not be so great as to cause significant safety or capacity reductions for the wider roading network. Council's infrastructure manager has advised that they do not consider the speed limit of Springvale Road past the site unlikely to need to change as a result of development on the site. I consider the wider roading network to have sufficient capacity to accommodate development that would be anticipated if Council were to accept the request.

Conclusions

- [75] I recommend that the submission of NZTA be accepted and that the following changes be made to Rule 12.7.1.iii, if the panel accepts the request:

- h. There shall be no vehicle or other 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 in the Clyde Industrial Precinct
- i. There shall be no more than one point of vehicle access to Springvale Road from the Clyde Industrial Precinct
- i.j. Prior to subdivision and or industrial development occurring on Lot 1 DP 600773 in the Clyde Industrial Precinct the State Highway 8 / Springvale Road intersection shall be upgraded improved by providing:
 - 1. An auxiliary left turn lane for traffic turning left off State Highway 8, with the details of the design being in general accordance with Austroads Guide to Road Design Part 4A: Unsignalised and Signalised Intersections; and
 - 2. A wide shoulder adjacent to the auxiliary left turn lane under (1), extending into Springvale Road to provide safe left turning for cyclists.
 - 3. 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).

Advice Note: The final design of the intersection will be approved as part of the Corridor Access Request required from the New Zealand Transport

Agency under the Government Roading Powers Act 1989 for works in the state highway.

- [76] Possible changes to Rule 9.3.6.iv have previously been outlined. I reiterate that I recommend the concerns raised by NZTA in relation to potential for shading of the highway be considered in relation to any change to this rule.

11. Need for Industrial Land in this Location

Submissions

- [77] Of the submitters, Mr Grey²³, Mr Young²⁴, and Mr Rabbitt and Ms Axby²⁵ questioned whether Clyde needed an industrial zoned area. All three submitters also consider that there is adequate industrial zoned land available in Alexandra. Rabbit and Axby argue that there is no demand for industrial land in Clyde.

Discussion

- [78] Generally speaking, industrial activities benefit from land with particular characteristics. I agree with Ms Hampson's assessment provided in support of the application that these include adequate provision of space to undertake activities, good access to transportation networks, nearby or convenient employment markets and nearby or convenient markets to sell their products.²⁶ Ideally, they would also be in a location that is not close to receptors that may be sensitive to the effects of their activities²⁷ in order to minimise the potential for conflict between uses and allow industrial operations to undertake activities that are functionally required for their business.
- [79] Anecdotally, I understand that industrial land in Alexandra has been slow to be developed. For example, Molyneux Estate's 29 industrial lot subdivision around MacLean Road and Centago Crescent was originally consented in 2009,²⁸ but not completed until 2018, with several allotments currently appearing vacant²⁹. A 19 lot subdivision by Canepa Developments Ltd off Ngapara Street in 2010 lapsed without being given effect to.³⁰ This has since been superseded by a subdivision that Canepa intends to limit future buyers to use for residential activity only.³¹ This consent has not

²³ #003 - Grey

²⁴ #006 - Young

²⁵ #007 - Rabbitt and Axby

²⁶ Request Appendix F, Pages 39 and 40.

²⁷ For example, noise, dust, vibration, odour, lightspill or pollutants.

²⁸ RC 090207

²⁹ For example, Lots 10, 11, 15 and 16 DP 513436. These lots are currently not built on based on 2023 aerial photographs, although I note that they may also be used for activities that do not require buildings and may not show clearly on satellite photos, such as storage.

³⁰ RC 100021

³¹ RC 230014. As part of this consent, consent notice conditions equivalent to the permitted activity standards of the Residential Resource Area, would be imposed, limiting built form to align with the District's residential areas. I understand that the use of the land was intended to be limited to

been given effect to at the time of writing. However, I do consider that, eventually, the available land would be fully taken up. As this point approaches, the next question that needs to be asked would be where to provide industrial land next. I consider that both of these areas have very limited options to expand. Both are constrained by existing residential uses around them, with the Ngapara Street area also being constrained by the Boot Hill reserve to the north. Existing undeveloped industrial zoned land at 11 Success Street is known to have geotechnical constraints from historic mining activities that would need to be addressed before this area could be developed. The Alexandra landfill, also industrial zoned, would not be available for re-development within any reasonable timeframe without substantial remediation, assuming such remediation was practicable, viable and politically acceptable.

- [80] The Vincent Spatial plan identifies two new areas for potential re-zoning to industrial, reflecting existing industrial uses around Fulton Hogan's yard on Dunstan Road in Alexandra, and Contact Energy's depot along Springvale Road in Clyde. The re-zoning of these areas could provide further opportunities for industrial development in the area. However, again, these areas have limited room to expand. The Dunstan Road land is bordered by a terrace riser, residential zoned land and a Council reserve. The Springvale Road land is bordered by the rail trail, Clyde cemetery and more residential zoned land.
- [81] This suggests the most likely course of action in my opinion, having regard to the needs and preferences of industrial activities, would be to establish a new area on the periphery of the town, likely somewhere between Alexandra and Clyde, at some point in the foreseeable future. The timeframe for this would depend on the speed of uptake in the remaining industrial land in Ngapara Street, Boundary Road, and the areas proposed on Dunstan and Springvale Roads under the Vincent Spatial Plan³² but the decision on where to provide new land for industrial growth for the area will need to be made, eventually.
- [82] I also note that the current situation puts the current future development of the area's zoned industrial land at the hands of two primary landowners (On the assumption that the landfill will not be able to be viably redeveloped within relevant timeframes and not including land that may be rezoned under the VSP). This current duopoly concentrates a high level of control over the supply of existing industrial zoned land to a small number of actors. This creates potential for detrimental effects on the availability of land, which may be alleviated somewhat by introducing additional actors into the market. I note that land banking in this way affecting affordability and supply of land was one of the issues identified in the Vincent Spatial Plan. If the VSP is fully given effect to, this number of landowners would increase to seven, somewhat reducing the concerns outlined above.

residential activities through private covenants.

³² Modelling undertaken in support of the Vincent Spatial Plan suggests that this is unlikely to be within the 30 year timeframe of that plan. Instead, it focuses on the utilisation of existing areas (Vincent Spatial Plan, Page 24). New industrial land is proposed mainly where it reflects existing uses, namely Fulton Hogan's depot on Dunstan Road, two adjoining lots, and the Contact Energy and rural fire buildings on Springvale Road. This land is all currently in the Rural Resource Area (Rural Residential) and no changes to the District Plan to re-zone these lots are currently under consideration.

However, in general, I consider that increasing the number of actors able to supply industrial land in the area would not be an adverse outcome.

- [83] I concur with the requestor that the site features many of the aspects desirable to industrial land. It has reasonably direct access to transport links to Alexandra, Cromwell and Omakau and is relatively centralised to local employment markets. I consider that effects on sensitive receptors nearby can be adequately managed through appropriately worded requirements for setbacks and landscape screening. The site would also function as an extension to the industrial land identified to the south of the request site as part of the VSP, and add additional industrial capacity that might not be able to be provided from expanding existing or identified possible areas in Alexandra. I recognise that forecasting of demand is never going to be exact. However, I do not see that as a reason to disregard it. In my opinion, if there is, in fact, no demand for industrial activity in Clyde, that risk is primarily on the requestor at this stage. In the context of the site, I consider the risks to the wider public from mis-judging demand to be low.

Conclusions

- [84] I disagree with the submissions from Messrs Grey and Young, and Mr Robert and Ms Axby and consider that there is a reasonable demand for industrial land that could be met by the request. Increasing the number of owners of land that could be developed for industrial purposes in the area can also help with the functioning of the local industrial land market by reducing the ability of any individual landowner to influence the market by restricting supply of land. In the event that Mr Robert and Ms Axby are correct and there is no demand for industrial land in Clyde, the risks associated with that scenario are primarily on the requestor at this stage.

12. Availability of Utilities

Submissions

- [85] No submissions discussed this matter.

Discussion

- [86] Information provided by the requestor indicate that the site should have sufficient capacity to manage stormwater discharges from future buildings and impervious surfaces to ground within the boundaries of the site. This would be subject to detailed design work being undertaken at the time the land was developed. I consider this to be appropriate. I also note that there could be opportunities for capturing stormwater to provide or supplement irrigation of the proposed required landscaping areas. This could be investigated further at the time a specific development is put forward for the site.
- [87] Chorus and Aurora have provided in principle confirmation that the site could be supplied with telecommunications and electricity connections to their respective networks. I

understand that these network connections could be made underground, in line with Rule 16.7.10, subject to confirmation at the time the land is developed.

- [88] Council's Water Services Planning and Policy Manager has confirmed that, in principle, future development could be connected to Council's water and wastewater networks in Clyde. They have confirmed that Council has not considered or agreed to any specific design or location for connections to the network, although they did specify that no connection to the 500mm principal water main or 25mm water rider main that run along the boundary of the site would be considered. Instead, connections would need to be extended from the network on the western side of State Highway 8. The principal main is the primary water connection to Alexandra, and the rider main would have insufficient capacity to service the site. This differs from the proposal put forward by the requestor, which assumes a connection would be made to the 500mm main.³³ Despite this, I consider there to be enough evidence for me to be satisfied that a connection to some location in the network can be achieved, subject to confirmation at the time the land is developed and the completion of any necessary upgrades to existing infrastructure.

Conclusions

- [89] Overall, I consider that additional development anticipated by the request could be adequately serviced in principle. The exact nature of any service provisions can be determined at the time the land is developed.

13. Soil Contamination and Geotechnical

Submissions

- [90] No submissions discussed these matters.

Discussion

- [91] Mr Midgely, environmental scientist, has undertaken a preliminary site investigation (PSI) in relation to the proposal, and advises that the site contains contaminants from historic uses such as storage of engine oil, treated timber and waste disposal to land. However, they conclude that it is highly unlikely that these will exceed relevant soil contamination standards. In several cases, contaminants such as arsenic and lead exceeded background levels, but predicted concentrations were always substantially below (In no cases more than 50%) the relevant human health criteria for earthworks, commercial or industrial activities.³⁴
- [92] Mr Midgely's PSI has been peer reviewed by Ms Lisa Bond, Principal Contaminated Land Consultant from WSP. Ms Bond generally agreed with Mr Midgely's assessment that based on current sources of contamination it is highly unlikely that there will be a risk to human health if the site were re-zoned to industrial. She did note that the

³³ Myles Garmonsway and Peter Dymock, Request Appendix I, Paragraph 5.2

³⁴ Claude Midgely, Request Appendix H, Table 5.

assessment does not look at ecological health metrics, does not consider the proximity of potential contamination from the Clyde Cemetery, and lacks information about the quality control processing of samples taken for XRF testing to ensure they were taken and processed in line with best practice. In terms of the processing of samples, the requestor is invited to provide evidence that they have followed these best practices, if available. Otherwise, re-testing may be required before the site can be developed.

- [93] I agree with Ms Bond that the Clyde Cemetery is a potential source of soil contamination, for example from chemicals used in embalming. Over time, this contamination could spread to the site. However, I note that burials have occurred over 170m from the site, meaning contamination would have a reasonably long distance to migrate to reach the site. Ms Bond recommends the risk from the cemetery be incorporated into the conceptual site model that guided Mr Midgely's assessment. I invite the requestor to address this point.
- [94] In terms of ecological health metrics, Ms Bond ultimately concludes that, because the proposal is to change the site to a generally less sensitive land use, the risk to environmental health associated with changing the zoning and use of the site is low. I concur.
- [95] I note that the PSI is focused on the risk to human health from existing contaminants in the soil in terms of the Resource Management (National Environmental Standards for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (NES-CS). Its function is not to consider how new sources of contamination from a change of land use might affect ecological receptors. I consider that this would be better addressed through other legislation, such as the Hazardous Substances and New Organisms Act 1996.
- [96] Given these results and the peer review of Ms Bond, I broadly concur with Mr Midgely that it is unlikely that earthworks on the site, or the change of use of the land to industrial uses, would result in notable risks to human health for construction workers and occupants respectively. Provided Ms Bond's comments about the XRF testing and consideration of risks from the Clyde Cemetery are addressed, given a PSI exists for the site that concludes that it is highly unlikely that there will be a risk to human health, subdivision or changing the use of the land to industrial or commercial uses would be considered permitted under Regulation 8(4) of the NES-CS. I note that the provisions of the Industrial Resource Area would allow for more sensitive activities, such as residential activities, as of right. The site has not been assessed against residential health criteria. If the land were to be used for residential purposes, further investigation would likely be required. This may require further resource consents under the NES-CS. Resource consent will also be required under the NES-CS for earthworks if they were to breach Regulation 8(3). However, based on the information provided in support of the request, I consider that this could reasonably be resolved at the time the land is proposed to be developed, and the exact nature of any earthworks are known.
- [97] Mr Stewart, geologist, advises that they do not see any site-specific geotechnical constraints which would preclude the site from being used for industrial development.³⁵

³⁵ James Stewart, Request Appendix J, at Pages 6 and 7.

They do consider that some further investigation would be needed into stormwater runoff and ponding from the terrace, and the risk of rock roll from uphill boulders. However, they consider that these risks can be better assessed at the time the site is developed. I note that the boulders in question are on Council land, not the requestor's. Therefore, it is not in the requestor's control whether any boulders could be removed or otherwise modified to prevent rock-roll damaging future development. However, given the lack of evidence of historic rock-roll identified by Mr Stewart in his assessment,³⁶ I do not consider this to be a significant concern. I adopt Mr Stewart's conclusions that there are no geotechnical constraints that would preclude Council approving the request.

Conclusions

[98] I am satisfied that the risk to human health associated with changing the use of the land from rural to industrial from contaminants in the soil is low, and geotechnical considerations do not pose a notable limitation on the future development of the site.

14. Statutory Analysis

Functions of Territorial Authorities

[99] Section 31 of the RMA requires every territorial authority to establish, implement and review objectives, policies and methods to achieve the integrated management of the effects of the use, development and protection of land in its jurisdiction, to ensure sufficient development capacity in respect of housing and business land, control the effects of the use, development or protection of land and control the emission of noise. The request is consistent with these functions.

Statutory Documents

[100] The following statutory documents are relevant to the request:

National Planning Standards 2019

National Policy Statement for Freshwater Management 2020

National Policy Statement for Indigenous Biodiversity 2023

National Policy Statement for Urban Development 2020

National Policy Statement for Highly Productive Land 2022

Operative Regional Policy Statement 2019

Proposed Regional Policy Statement 2021

Regional Plans

District Plan

³⁶ Request Appendix J at Page 5.

Vincent Spatial Plan

Iwi Management Plans

[101] These documents will be considered in turn below.

National Planning Standards 2019

[102] Council was required to give effect to the National Planning Standards 2019 by either making amendments to an existing plan within 5 years of the standards coming into effect, or through the notification of a new District Plan after the standards come into effect. The National Planning Standards provide a framework upon which all RMA plans must be built. Council has opted to implement the standards in stages as it reviews and notifies different chapters of the District Plan. The request does not accord with the National Planning Standards. However, it does accord with Council's current formatting of the District Plan. This does mean that, when Council reviews the Industrial section of the District Plan, some substantive changes may be made to the proposed new provisions, for example to reflect new national definitions. However, this will happen as part of a more comprehensive review of the provisions that apply to all industrial areas in the district. Given this, I do not consider that the lack of integration of the National Planning Standards in the request should count against it.

National Policy Statement for Freshwater Management 2020 (NPS-FM)

[103] The overarching objective of the NPS-FM is to ensure that the management of natural and physical resources prioritises first, the health and wellbeing of freshwater ecosystems, second the health needs of people then, third, the ability of people and communities to provide for their social, economic and cultural wellbeing.

[104] I consider that the site is sufficiently far enough away from water bodies (Including wetlands) that it will not impinge on the provisions of the NPS-FM.

National Policy Statement for Indigenous Biodiversity 2023 (NPS-IB)

[105] The overarching objective of the NPS-IB is to ensure that there is no overall loss of indigenous biodiversity after the commencement date of the policy statement. The site is not identified as including a significant natural area (SNA) in terms of the NPS-IB under the District Plan.³⁷ Nor is it identified as containing significant habitats of indigenous vegetation or habitats for significant indigenous fauna. The site predominantly appears to consist of exotic grasses. There are opportunities for including native species in landscaping around the site. I consider it unlikely that industrial use of the site would result in significant adverse effects on indigenous biodiversity that would warrant consideration under Clause 3.16 of the NPS-IB. I consider that the proposal would not be inconsistent with the provisions of the NPS-IB.

³⁷ I note that the District Plan has not yet been updated to give effect to the SNA mapping requirements of the NPS-IB.

National Policy Statement for Urban Development 2020 (NPS-UD)

[106] The overarching objectives of the NPS-UD are to ensure New Zealand's urban environments are well functioning, with affordable housing and access to a range of employment opportunities, are well serviced by transport (Specifically public transport), are integrated with infrastructure decision making, support reductions in greenhouses gases, are resilient to the effects of climate change, and are responsive to changing community needs. It directs Councils to take a medium and long term vision (out to 30 years) when making decisions that affect urban environments, and to ensure that sufficient development capacity is provided to meet expected demand for housing and business land in the short, medium and long terms.³⁸ This land must be plan enabled, infrastructure ready and suitable to meet the demands of different business sectors.³⁹

[107] CODC does not consider that the district is currently subject to the NPS-UD, as its current growth projections do not show the district containing an urban area with more than 10,000 people, as defined under the NPS-UD. However, it has sought to have regard to the provisions of the NPS-UD in relation to providing for developable land and well functioning urban environments as much as it can when making decisions on the District Plan, on the assumption that Cromwell, specifically, may have an urban area with a population of 10,000 people sooner than forecast.

[108] Based on Council's growth projections associated with the Vincent Spatial Plan, the request would not be required to meet projected demand for industrial land. Growth projections provided by the requestor suggest that there is demand for industrial land in this location. Regardless, the proposal would increase employment opportunities in Clyde in an area that has good access to transport connections. Council's engineers have confirmed that, while the site is not currently serviced for water and wastewater, these services can be provided, in principle. I consider that the proposal would contribute positively towards the functioning of Clyde and that the proposal would not be contrary to the intent of the NPS-UD.

National Policy Statement for Highly Productive Land 2022 (NPS-HPL)

[109] The application site includes soils identified in the New Zealand Land Resource Inventory (NZLRI) as Land Use Category (LUC) 3. This means that the site is considered to contain highly productive land, based on the provisional definition of highly productive land in the NPS-HPL. The overarching objective of the NPS-HPL is to ensure that identified highly productive land is maintained for primary production, both now and for future generations. The provisional definition of highly productive land is intended to protect areas of more versatile soil, being LUC 1, 2 and 3, from development away from land based primary production, while District and Regional Councils undertake their own mapping exercise to identify the highly productive land in their jurisdiction.

[110] Since the request was lodged, the NPS-HPL has been amended, with those amendments coming into effect from 15 January 2026. Of relevance, these amendments have added a new clause to Section 3.6, which is the applicable section for urban

³⁸ NPS-UD, Clause 3.3(1).

³⁹ Clause 3.3(2).

rezoning of highly productive land. Clause 3.6(6) confirms that Clause 3.6(4) (Among other clauses not relevant to this request) does not apply to the urban rezoning of LUC 3 land. Clause 3.5 of the NPS-HPL remains relevant, however. This clause obliges territorial authorities to take measures to ensure the spatial extent of any urban zone covering highly productive land in the minimum necessary to provide for required development capacity while achieving well-functioning urban environments.⁴⁰ I note that the NPS-HPL does not specify whether this capacity needs to be in the short, medium or long term.⁴¹

[111] In response to these changes to the NPS-HPL, Mr White has argued that, because Ms Hampson identified a shortfall of land for industrial uses in the Vincent Ward and no industrial zoned land in Clyde, and that the proposed re-zoning is proportionate to identified demand, it constitutes the minimum required to provide the required demand. He hasn't gone back through Mr Hampson's assessment to demonstrate how the proposed re-zoning is the minimum required.⁴² I consider it necessary to unpack Ms Hampson's assessment further.

[112] Mr White also argued that the difficulty of realising the productive capacity of the site should act in favour of the proposal when considering Clause 3.6(5). While I agree that there are limitations on the ability of the site to be used productively, and will take this into consideration where I can, I struggle to see how this is relevant to Clause 3.6(5). Clause 3.6(5) only looks at whether the spatial extent of the proposed rezoning meets the anticipated demand, while achieving a well-functioning urban environment. The actual productive capacity of the land is not included as a matter of consideration.

[113] Further, Mr White has argued that Clause 3.6(5) relates to development capacity, and uses this to argue that land required for roading, buffers, setbacks and servicing areas should be discounted. Clause 3.6(5) requires Council consider the spatial extent of the urban zone required to achieve development capacity. By necessity, I consider that this must include all necessary internal circulation, any servicing areas, etc., as these are all required to realise that development capacity and contribute to the spatial extent of the zone. I will be considering the total area of the proposed re-zoning for the purpose of this assessment.

[114] In this case, Section 3.2.2 of Ms Hampson's assessment indicates that approximately 6.2-7.4 hectares of new industrial land would be required in the Vincent Ward over the next 10 years, with an indication in Section 3.3 that current vacant industrial zoned land could accommodate 5-6 years of that demand. The request would provide approximately 5.6 hectares of land gross. On Page 32 of her assessment, Ms Hampson concludes that the Alexandra area would not meet medium term sufficiency of industrial land, even if

⁴⁰ "Urban environment" is not separately defined in the NPS-HPL or in the National Planning Standards. Based on the definition of urban zones in the District Plan (Which includes industrial, residential and business zones), the request could be considered an extension to Clyde's urban environment for the purpose of this assessment.

⁴¹ I have taken short, medium and long term to be the next 3, 10 and 30 years respectively, using the definitions in the National Policy Statement on Urban Development 2020.

⁴² I have interpreted "minimum required" to be just enough to provide the expected area of industrial land required to meet demand, but no more. Re-zoning more land than is considered necessary to meet demand would start creating conflict with Clause 3.6(5).

the request was taken into account. Land earmarked for industrial zoning on the southern side of Springvale Road in the Vincent Spatial Plan is currently used for industrial activities. While they may be further developed if re-zoned, I agree with Ms Hampson that it is appropriate to assume that this land would not provide more than a small increase in available developable industrial land. I would also discount the approximately 2.6 hectares of developable land owned by Canepa Developments (Lot 21 DP 432706) identified by Ms Hampson. This land is in the process of being subdivided, with the developer intending that the lots be used for residential purposes.⁴³ As outlined in Paragraph 82 of my assessment, I consider that the proposal has several characteristics that lend itself to industrial land uses, such as ready access to transportation routes and proximity to land earmarked as industrial under the Vincent Spatial Plan.

[115] Once the Canepa land is removed from consideration, based on Ms Hampson's forecasts in Table 3.3 of her assessment, there would be a shortfall of between 3.7 and 2.5 hectares of industrial zoned land in the wider Manuherikia area (Alexandra, Clyde and Omakau) by 2034. The proposal would provide up to 5.6 hectares of land. In the short to medium term, I consider that the proposal would re-zone more land than is required to meet demand across the Ward. Taking a longer term view, however, I recognise that there are limited options for providing additional industrial zoned land around Alexandra or Clyde once existing zoned land in this area is taken up. I also agree with Ms Hampson's conclusions that relying on the 2.4-2.5 hectares of vacant industrial zoned land in Omakau to cater for the bulk of industrial demand growth in the area is less efficient than providing land locally to Clyde and Alexandra. This is due to the smaller population of Omakau, and distance from Omakau to Alexandra, Clyde and State Highway 8. Discounting this land would increase the medium term shortfall to between 6.3 and 5.4 hectares. This is in line with the spatial extent of the proposed re-zoning. Based on this, I consider that the proposal would provide more development capacity than is technically required to meet predicted demand in the wider Manuherikia area over the medium term. In the longer term, however, the proposed land could cater to future demand in a location that is more convenient to population centres than vacant land in Omakau, and has good access to transportation routes. In this context, particularly when taking a long term view, I consider that the proposal would be unlikely to provide an excess of development capacity.

[116] The proposal would result in the urban area of Clyde jumping State Highway 8. Jumping such land features can have effects on the functioning of the urban environment because the state highway forms a natural barrier to movement across it.⁴⁴ This limits the connectivity of the urban fabric, particularly for people looking to move between the proposed industrial area and the rest of Clyde. It also creates more potential for conflict between road users crossing the highway and those travelling straight through. I consider that the roading upgrades proposed by the applicant, as amended by the

⁴³ Resource consent RC 230014. This consent would impose consent notice conditions requiring compliance with residential style bulk and location standards. I also understand that the developer intends to impose private covenants requiring the lots be used for residential purposes only. Engineering approval to commence physical works was granted for this consent in February 2025.

⁴⁴ For example, it provides limited points of vehicular and pedestrian access, along with a road layout that encourages high speeds for through traffic and discourages pedestrian use, in particular.

submission of NZTA, would adequately manage the potential effects on the operation and safety of the State Highway. The proposal would be relatively inconvenient for people travelling from the rest of Clyde to work in the area due to the lack of connectivity across State Highway 8 (Compared to if the area were able to be located on the same side of the highway as the rest of the town). However, given Plan Change 19 has both earmarked the rest of the contiguous land on the south-western side of the highway for residential uses, and the land to the north-east of the highway, bordered by Springvale road and Young Lane for future residential use, I consider that locating proposed industrial area along Springvale Road would be the next logical direction for the town. This aligns with proposed industrial rezoning along the southern side of Springvale Road, opposite the site. It is also more convenient and connected to Clyde than the alternative of providing additional land in either Alexandra or Cromwell, both of which would require inter-town commutes, further limiting options for Clyde residents. It would also add another landowner to the industrial land market, potentially increasing the competitiveness of the supply of industrial zoned land for further development by reducing the level of market power held by any one landowner. Having regard to these matters, I consider that the proposal would not notably detract from the functioning of the Clyde township. The proposed location involves some trade-offs in terms of connectivity and convenience, particularly for people who would live in Clyde and work in the proposed industrial area. However, I consider that these trade-offs are appropriate having regard to the directions indicated by Council's previous decisions in the Vincent Spatial Plan and Plan Change 19.

[117] Given the above, I consider that the request would satisfy the requirements of Clause 3.6(5) of the NPS-HPL. I consider that the request would be undertaken in accordance with the NPS, and would be consistent with Policy 5 as a result. I accept the requestor's arguments that the site has limitations on its productive capacity that mean re-zoning the site would not be inconsistent with Policy 4. I consider the proposal to be consistent with the provisions of the NPS-HPL.

Operative Regional Policy Statement 2019 (ORPS)

[118] I concur with the requestor that the request would provide specific land for industrial activities in an area that I consider to be broadly appropriate for the anticipated use. The function and values of local and regional ecosystems are unlikely to be disrupted. The site is able to be integrated into existing transportation, water and energy infrastructure. No significant changes to the hazard profile of the area are anticipated. I consider that the proposal would be consistent with the ORPS.

Proposed Regional Policy Statement 2021 (pORPS)

[119] I concur with the requestor that the request would help meet forecast demand for commercial and industrial activities in a location that is able to be integrated into infrastructure networks, avoids areas with historic significance and is in an area that I consider to be broadly appropriate for the proposed uses.

[120] Policy LF-LS-P19, requires the maintenance of the availability and productive capacity of highly productive land by applying the NPS-HPL. In paragraphs [108]-[112] I

concluded that the request has correctly met the amended tests for re-zoning highly productive land in the NPS-HPL. Given this, I consider the request to be consistent with LF-LS-P19.

[121] I also consider the request to be consistent with the other relevant parts of the pORPS that are operative, particularly those in the UFD, EIT-INF, EIT-TRAN, HAZ and HCV chapters, for reasons provided throughout this assessment and adopting the assessment of the requestor.

Regional Plans

[122] The Regional Plans for Air, Water and Waste would be relevant to the request. I do not consider there to be anything in the request that would force an inconsistency with these plans. I note that this would not exempt any party seeking to take advantage of the proposed industrial zoning from their obligations to obtain any resource consents necessary under these plans for their specific proposal. Nor is it a guarantee that any given industrial activity will be consistent with these plans.

District Plan

[123] In terms of managing effects on nearby land uses and zones (Policies 9.2.2 and 9.2.3), I consider that the proposed landscaping requirement would go some way towards consistency with these policies. However, for the reasons provided in paragraphs [38]-[40] of my report, I consider that the landscaping standard would require revision to fully address the concerns raised in submissions. Additionally, for the reasons provided in paragraphs [47]-[55] of my report, I consider that a lower permitted noise level than would otherwise be provided by Rule 9.3.5.iii could be needed in relation to the Clyde Cemetery to adequately manage noise effects on cemetery visitors. Provided these matters could be address, I consider that the request would allow for future development that could adequately manage its effects on nearby land uses.

[124] I consider that the proposal would, more likely than not, have adequate provision for infrastructure, and would be consistent with Policies 9.2.5 and 12.4.1, and their associated objectives.

[125] I consider that nuisance effects from future development of the site can be adequately managed through a mixture of separations from existing and planned future activities and appropriately worded screening standards. The request can be considered consistent with Policy 12.4.7.

[126] The proposal would make provision for industrial activities. I consider that its location would manage most effects of industrial activities on other land uses. However, I consider that changes would need to be made to the proposed District Plan provisions to manage visual effects, and privacy for the Clyde Cemetery, in particular.

[127] Policy 6.4.1 requires Council to identify and provide for a level of amenity which is acceptable to the community and manage adverse effects on wellbeing that may result from development, while recognising that change in land use is inevitable for the community in order to provide for wellbeing in order to maintain quality of life for urban

communities. Policy 6.4.2 is a permissive provision that seeks to enable expansion of urban areas, provided it is undertaken in a manner that manages its effects on adjoining rural areas and heritage values, among other matters not relevant to the proposal. Submissions on the application indicate a level of community dissatisfaction with the anticipated level of amenity that might result from the industrial development of the site. However, for the reasons provided earlier in my assessment, I consider that the effects on amenity will be low, and could be appropriately managed through permitted activity standards. I do not consider four submissions in opposition to the request to be a sufficient expression of community intent in terms of Policy 6.4.1. In this context, I do not consider that the request would result in an unacceptable level of amenity.

[128] I consider the request unlikely to significantly affect the amenity values of nearby rural areas. In my opinion, these effects can be adequately mitigated through appropriately worded permitted activity standards regarding landscaping. I also consider that this landscaping can adequately manage effects on the heritage values of the existing parts of the Clyde cemetery. There are no areas with elevated historic, archaeological or cultural significance in the vicinity of the site. Residual effects on community wellbeing can be adequately managed through permitted activity standards and resource consent requirements. I consider that the request is consistent with Policies 6.4.1 and 6.4.2.

[129] The proposal would provide opportunities for the people of the district to provide for social and economic wellbeing through the creation of additional economic and job opportunities. Provision of industrial land is a reasonably foreseeable need of the area in the long term. I consider that the proposal would be consistent with Objective 6.3.1.

[130] Overall, I consider that some changes would need to be made to ensure the request would result in development that was consistent with the objectives and policies of the Industrial Resource Area. However, provided these were made, there would be nothing that made the proposal inconsistent with the objectives and policies of the District Plan.

Vincent Spatial Plan

[131] The VSP is intended to be the blueprint for development around the main towns in the Vincent Ward, with a 30 year mindset. The VSP envisages the requestor's site retaining its rural character, while also providing potential for greenspace or amenity connections with the Clyde Town Belt. The VSP also identifies a new potential industrial zone along the southern side of Springvale Road, around the Clyde Railhead, which is intended to reflect the existing land uses in this area. While not a statutory document, it is a record indicating the public and Council's intent for where development should be focused over the next 30 years.



Figure Two: The request site shown in the VSP as a mixture of rural (Light beige) and open space (Dark green) land. The blue area is the Clyde cemetery. The purple area is earmarked as future industrial land.

- [132] The requestor has argued that there are limitations on the useability of the site for rural activities, including rural production. The VSP does not show any clear intention for how rural uses of the land should be provided for.
- [133] The proposed new Industrial Resource Area provisions would encourage the development of landscaping buffers around the western, southern and eastern sides of the site. This broadly aligns with the “Natural Open Space” notation applied to the site in the VSP. Provision of amenity planting buffers contributing to blue/green networks is also recognised by the VSP.⁴⁵
- [134] On face value, I consider that the use of the application site for industrial purposes would constitute a logical extension of the VSP’s identified industrial land in Clyde. I understand that the intent of this land was to recognise existing activities, rather than provide for new development options per-se. However, re-zoning in accordance with the VSP would still allow for a level of intensification of land uses, if the landowners wished.
- [135] Ultimately, I consider that the proposal would help to achieve some parts of the VSP, while allowing for a use of the land that is consistent with the intent of the VSP for land on the other side of Springvale Road. I do not consider the proposal to be out of step with the intent of the VSP for Clyde.

⁴⁵ Vincent Spatial Plan, Page 28

Kai Tahu Ki Otago Natural Resource Management Plan 2005 and The Cry of the People, Te Tangi a Taurira – Ngai Tahu ki Murihiku Natural Resource and Environmental Iwi Management Plan 2008 (IMPs)

- [136] The Kai Tahu Ki Otago Natural Resource Management Plan 2005 sets out issues, objectives and policies on resource management matters important to Kāi Tahu Ki Otago on a catchment by catchment basis. Important matters related to the Mata Au / Clutha River catchment that are relevant to the proposal include capacity for wastewater management, land use intensification and sedimentation from urban development affecting wai Māori, and the maintenance of cultural landscapes associated with ara tawhito, routes into the Otago interior. It seeks to discourage activities that cause increases silt loading in waterways or their reaches,
- [137] Te Tangi a Taurira sets out issues and policies on resource management issues important to Ngāi Tahu ki Murihiku. I note that the area covered by this plan borders along the true right of the Mata-Au, and does not incorporate the request site. However, consideration should still be given to how the request might affect the values this plan seeks to protect. Primarily, in relation to the request, this relates to fresh water management, waterway enhancement, avoiding discharge of contaminants into waterways and promoting the priorities in the Te Rūnanga o Ngāi Tahu Freshwater Policy 1977.
- [138] I note that no Iwi or Hapū representatives submitted on the request. I have no specific expertise in te ao māori. My below assessment is based on my interpretation of the policies of both documents solely from a planning perspective.
- [139] The proposal is set sufficiently far away that I consider it highly unlikely to directly change stormwater flows into the Mata-Au, including changing the sediment load entering the awa directly, or by entering its tributaries. Nor do I consider future development associated with the request likely to notably affect the cultural values inherent in the landscape or the availability or collection of mahika kai, given it involves a logical extension of the Clyde township away from the Mata-Au in a location that does not impinge on significant landscape features.
- [140] Water and wastewater services are intended to be from extensions to existing reticulated networks, minimising the need for new water takes, and avoiding new discharges of wastewater, with wastewater intended to be treated through the Alexandra wastewater plant.
- [141] Industrial uses of the site could introduce new sources of contamination to the area. I understand that storage and containment of chemicals in Central Otago's industrial areas is solely managed under the Health and Safety at Work (Hazardous Substances) Regulations 2017. Given distances from water bodies, I consider that this would be sufficient to manage risks around chemical contamination where they are of concern to Kāi Tahu ki Otago and Ngāi Tahu ki Murihiku.
- [142] Overall, I consider that the request would not be contrary to either IMP.

Consistency with the plans of adjacent territorial authorities

[143] I do not consider there to be any provisions in the District Plans of neighbouring territorial authorities that are relevant to and affected by PC23 or vice versa.

Consideration of alternatives, benefits and costs

Extent to which the Objectives of the Proposal are the Most Appropriate Way to Achieve the Purpose of the Act

[144] The overarching purpose of the RMA is to promote the sustainable management of natural and physical resources. The stated objectives of the request are as follows:

- 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 marketplace 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.

[145] In my opinion, the appropriateness of the objective of the request hinges on four main questions; Is there an identified demand for industrial land specifically in Clyde, is an industrial land use zoning necessary to provide for any identified demand, is the land appropriate for industrial activity, having regard to surrounding land uses and site conditions, and is the site suitable for industrial activity, having regard to the needs and preferences of industrial activities?

[146] In relation to the first question, the requestor has identified demand for industrial land in the area. Based on the submissions received and the modelling undertaken in support of the VSP, it is a likelihood that this demand could be met in the next 30 years through existing and proposed industrial areas in Alexandra. However, I consider that providing additional capacity and, in particular, spreading that capacity across more landowners would not be detrimental to the function of the market for industrial land. It also helps to provide additional flexibility for the market. I have no reason to doubt that there is demand for industrial zoned land specifically in Clyde.

[147] In relation to the second question, Clyde currently includes a mixture of land in various residential zones, Business Resource Area, Rural Resource Area, both with and without a Rural Residential overlay. The only zones that make provision for industrial activities are the Business Resource Area and Rural Resource Area, the latter of which limits the

size of any industrial activities on the land. The Business Resource Area forms the Clyde town centre, which is in a location that includes a range of activities that may not appreciate industrial activities locating close by and is not as convenient to key regional transportation routes. It is also overlaid with a heritage precinct notation, which may require limits to built form that are not favourable to contemporary industrial development. In this context, I consider that provision of industrial zoned land would be appropriate to provide for demand identified in support of the request. In my opinion, the current land use zoning for Clyde would not adequately provide for industrial activities to a level anticipated by a dedicated zone.

[148] Based on the assessment of Mr Carr, and reflecting the upgrades to the State Highway 8 / Springvale Road intersection suggested by NZTA, I consider that the request would be able to be adequately integrated into the roading network. Required upgrades would help to provide for the ongoing operation of the road, contributing to its sustainable management.

[149] Based on the assessment of the proposal by Ms Hampson and her descriptions of the needs and preferences of industrial activities, I have no reason to believe the site would not be suitable for the needs and preferences of industrial activities.

[150] The site is identified as being highly productive land under the NPS-HPL. For the reasons provided in Paragraphs [108]-[112] of my report, I consider that the proposal would meet the tests for re-zoning the land under this policy statement.

[151] On the whole, I consider that the objectives of the proposal would be appropriate to achieve the purpose of the RMA.

Whether the Provisions in the Proposal are the Most Appropriate way to Achieve the Objectives of the Request

[152] The requestor has assessed four main options for achieving the objectives of the request. These are: maintain the status quo rural zoning, request the land be re-zoned to industrial as part of Council's District Plan review, request a private plan change to re-zone the site to an existing resource area (This is the option taken) or request a private plan change to apply a set of bespoke planning provisions to the site.

The objectives of the request are not contingent on the requestor's site to be realised. Land other than that owned by the requestor could also viably be a suitable site in close proximity to Clyde, which could also achieve this objective. Therefore, I consider that consideration of a fifth alternative, re-zoning a different area of land to either an existing or new industrial zone, is missing from the requestor's assessment. However, for the reasons provided in my assessment, I consider that the option put forward to re-zone the site would meet the objectives of the proposal, and would be consistent with all relevant planning documents. Re-zoning other land to provide the same development capacity would separate it from other land earmarked to be re-zoned under the Vincent Spatial Plan, and would likely be even more physically separated from the rest of the Clyde township than the proposed site. Given this, I consider the proposal to be the most appropriate way to achieve the objectives of the request.

Part 2 Matters

[153] Part 2 sets out the purpose and principles of the Resource Management Act 1991. Section 5 sets out the sustainable management purpose of the RMA. Section 6 sets out several matters of national importance, which must be recognised and provided for in all planning decisions. These include protection of outstanding natural features and landscapes, significant habitats of indigenous flora or fauna, protection of historic heritage and management of risks from natural hazards. Section 7 sets out other matters over which particular regard must be had, including the efficient use and development of resources, amenity values, the finite characteristics of resources, kaitiakitanga and intrinsic values of ecosystems. Section 8 requires decision makers take into account the principles of the Treaty of Waitangi.

[154] I do not consider any of the matters of national importance listed in Section 6 to be of particular relevance to the request.

[155] For the reasons given in Paragraphs [77]-[81] of my assessment, I consider that the request would meet an identified demand for industrial land, in a location that is suited in terms of its access to transport infrastructure, potential employees and other matters important to industrial land uses. I consider that the proposal would help provide opportunities for the Clyde community to benefit their economic and social wellbeing in a way that will adequately maintain amenity values and environmental quality, and address the other matters in Section 7 of the RMA.

[156] Based on the reasons provided throughout this report, I consider the proposal to be consistent with the sustainable management purpose of the RMA.

15. Conclusion

[157] For the reasons set out in this report, I recommend that Plan Change 23 be accepted, subject to the further changes to provisions that I consider to be necessary to address submissions and achieve the purpose of the plan change in Appendix One. These changes are either minor and therefore consistent with the original s32 evaluation, or a further evaluation under s32AA has been set out in this report.



Adam Vincent

27 February 2026

APPENDIX ONE – RECOMMENDED PROPOSED NEW AND ALTERED PROVISIONS:

This includes provisions proposed by the requestor in blue and changes proposed in response to submissions are in red. Additions are underlined and deletions are struck through.

9.3.5.iii. Noise

Cross Reference: Policies 9.2.2, 9.2.4

Breach: discretionary (restricted) activity see Rule 9.3.3

- a. All activities shall be conducted so as to ensure the following noise limits are not exceeded at any point within any Industrial Resource Area,

On any day 7:00am - 10:00pm 65 dBA L10

10:00pm - 7:00am the following day 45 dBA L10

85 dBA Lmax

Provided that the following noise limits shall not be exceeded at any point within a Residential Zone or at the boundary of Designation D68 (Clyde Cemetery):

On any day 7:00am - 10:00pm 55 dBA L10

10:00pm - 7:00am the following day 45 dBA L10

70 dBA Lmax

Provided that the above noise limits shall not apply to any temporary activity (as defined).

- b. Where any new activity locates within any part of the Industrial Resource Area and that activity includes any noise sensitive activity, the activity or any building associated with the noise sensitive activity shall be sited, oriented and constructed so as to ensure that habitable spaces within the building shall be adequately isolated from any noise source on another site. Adequate sound isolation shall be achieved by siting and constructing the building to achieve an indoor design sound level of 45 dBA Lmax within any habitable room where the exterior noise source is within any Industrial Resource Area. The indoor design level shall be achieved with windows and doors

open unless adequate alternative ventilation means is provided, used, and maintained in operating order.

9.3.5.iv. Screening

Cross Reference: Policies 9.2.2, 9.2.4

Breach: discretionary (restricted) activity see Rule 9.3.3

- a. All site boundaries adjacent to Residential Zones or Business Resource Areas, shall have a solid fence of not less than 2 metres in height.

Such fencing shall be erected to adequately mitigate:

1. Any adverse visual effects of the site or activity.
2. Any adverse effects of noise, dust or lightspill emitted from the site.

PROVIDED THAT

- a. Any fencing shall not impede visibility on roads or at access points and intersections.
- b. All fencing shall be maintained, at all times, in a tidy condition.
- b. The perimeter of any open space (excluding carparking or service courts) associated with any residential activity adjacent to any industrial or trade premises shall be screened in a manner that mitigates the visual impact of any adjoining activity.
- c. On all site boundaries adjacent to State Highway 6 a landscaped strip of not less than 10 metres in width shall be provided. The strip shall not be paved or have any structures erected on it (including fences) and shall create the opportunity for landscaping to provide visual enhancement or screening. Landscaping shall not impede traffic visibility or shade State Highway 6 and shall be maintained in a healthy and tidy condition at all times. Provision shall be made for the landscaped strip on the plan of subdivision for Lot 2 DP 346988 and landscaping shall be established along the entire landscaped strip at the time of subdivision. The retention and future maintenance of the landscaping in the landscaped strip shall be provided for as a condition of subdivision consent that is to be subject to a consent notice.
- d. Within ~~lot 1 DP 600773~~ the Clyde Industrial Precinct, 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 or development 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. The landscaped buffer strip must not be paved or have any structures erected on

it. Landscaping must form a visual screen of the subdivision or development that, at a minimum, meets the following performance requirements:

1. In relation to the Clyde Cemetery, must include species that will achieve a minimum height of 4.0m when mature and must be sufficiently dense that, when mature, it will block direct line of sight measured horizontally at any point from ground level to 1.8m above ground level between the cemetery and industrial development within the Clyde Industrial Precinct.
2. In relation to State Highway 8 and Springvale Road, must be maintained to a height that avoids shading of the carriageway of State Highway 8 between 10:00 and 14:00 hours on the shortest day of the year.

12.7.1.iii. Access to Rural State highways and Arterial Roads

See Schedule 19.7

In addition to the requirements of i and ii above design and construction of access to rural State highways and arterial roads shall comply with the following standards:

- a. The access shall be sealed to the same standard as the adjacent road carriageway.
- b. Where the speed limit is 100 kph, spacing between accesses shall be not less than 200 metres (regardless of the side of road on which they are located), and no vehicle access shall be constructed within 100 metres of road intersections AND spacing between intersections (ie road intersections) shall be not less than 800 metres.
- c. Except as provided for in d. below, width of vehicular access ways at the property boundary are to be no greater than 6 metres.
- d. Heavy vehicular accesses shall be designed and constructed to:
 - i. A minimum width of nine metres.
 - ii. Carry the volume and weight of traffic likely to use the access.
 - iii. Ensure heavy vehicles do not have to cross the road centre line when making a left turn.
 - iv. Ensure the surface is constructed to the same standard as the adjacent road carriageway.
 - v. Have sufficient width to accommodate the swept path of the largest vehicle anticipated to use it.
- e. Driveways shall not be parallel to and level with roads within 20 metres of the road reserve.

- f. Figures 12.2 and 12.3 establish the minimum design standards for access determined by activity type.
- g. Access to State highways shall be to Transit New Zealand design specifications.
- h. ~~There shall be no vehicle or other access to State Highway 8 from any development or subdivision of Lot 1 DP 600773 in the Clyde Industrial Precinct and no direct access to Springvale Road from any lot subdivided from Lot 1 DP 600773~~
- i. ~~There shall be no more than one point of vehicle or other access from the Cromwell Industrial Precinct to Springvale Road.~~
- j. ~~Prior to subdivision and or industrial development occurring on Lot 1 DP 600773 in the Clyde Industrial Precinct the State Highway 8 / Springvale Road intersection shall be upgraded improved by providing:~~
 - 1. ~~An auxiliary left turn lane for traffic turning left off State Highway 8, with the details of the design being in general accordance with Austroads Guide to Road Design Part 4A: Unsignalised and Signalised Intersections; and~~
 - 2. ~~A wide shoulder adjacent to the auxiliary left turn lane under (1), extending into Springvale Road to provide safe left turning for cyclists.~~
 - 3. ~~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)~~

12.7.1.ix. Breach of Standards

~~Any activity that does not comply with the standards stated in Rule 12.7.1.iii.h-i.j shall be considered as is a non-complying activity.~~



Our Ref: A5202

Date : 16 August 2024

Planning Manager
Central Otago District Council
P O Box 122
ALEXANDRA

Attention: Lee Webster

Dear Lee

Re: Request for a Private Plan Change

1. The Hartley Road Partnership hereby requests a change to the Central Otago Operative District Plan to rezone its land at Springvale Road and State Highway 8, from Rural Resource Area to Industrial Resource Area.
2. In support of the Request, the following documents are attached:
 - The Requested Change to the District Plan
 - Sec 32 RMA91 evaluation
 - Assessment of Environmental Effects
 - Economic Assessment
 - Transportation Assessment
 - Soil Contamination Assessment (PSI)
 - Infrastructure Report
 - Geotechnical Review and Natural Hazards Assessment
 - Landscape Effects Assessment Report
 - Land Productivity Report
3. Please invoice the lodgement fee (deposit) to:

Hartley Road Partnership
c/- Leon van Boxtel
1 Jennings Way
RD1 ALEXANDRA Email: leon@benchmarkconstruction.co.nz

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Dunedin PO Box 5933 Dunedin 9054 03 477 3245	Queenstown PO Box 2645 Wakatipu Queenstown 9349 03 441 4715	Wānaka PO Box 283 Wānaka 9343 03 443 0110	Cromwell PO Box 84 Cromwell 9342 03 445 1826	Alexandra PO Box 103 Alexandra 9340 03 448 8775	Oamaru Level 2 19 Eden Street Oamaru 9400 03 443 8727	Christchurch PO Box 9194 Tower Junction Christchurch 8149 03 928 1533
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Yours faithfully

A handwritten signature in blue ink, appearing to be 'Peter Dymock', written in a cursive style.

Peter Dymock
PATERSON PITTS LIMITED PARTNERSHIP

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REQUEST FOR A CHANGE
TO THE OPERATIVE
CENTRAL OTAGO DISTRICT PLAN

HARTLEY ROAD PARTNERSHIP

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Dunedin PO Box 5933 Dunedin 9054 03 477 3245	Queenstown PO Box 2645 Wakatipu Queenstown 9349 03 441 4715	Wānaka PO Box 283 Wānaka 9343	Cromwell PO Box 84 Cromwell 9342 03 445 1826	Alexandra PO Box 103 Alexandra 9340 03 448 8775	Oamaru Level 2 19 Eden Street Oamaru 9400 03 443 8727	Christchurch PO Box 9194 Tower Junction Christchurch 8149 03 928 1533
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DOCUMENT CONTROL

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

AUTHOR(S)

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

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	Appendix 'K' - Landscape Assessment	
	Appendix 'L' - Land Productivity	

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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

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
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 .

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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 – Earnscleugh 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 is 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 1500m².

On the opposite side of SH8 is the Clyde township, generally consisting of lots averaging 800-1000m² with large standalone dwellings, a reflection of the minimum lot size required for unreticulated 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:

- The request or part of the request is frivolous or vexatious; or*
- Within the last 2 years, the substance of the request or part of the request –*
 - Has been considered and given effect to, or rejected by, the local authority or the Environment Court; or*
 - Has been given effect to by regulations made under Section 360A; or*
- The request or part of the request is not in accordance with sound resource management practice; or*
- The request or part of the request would make the policy statement or plan inconsistent with Part 5; or*
- 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.

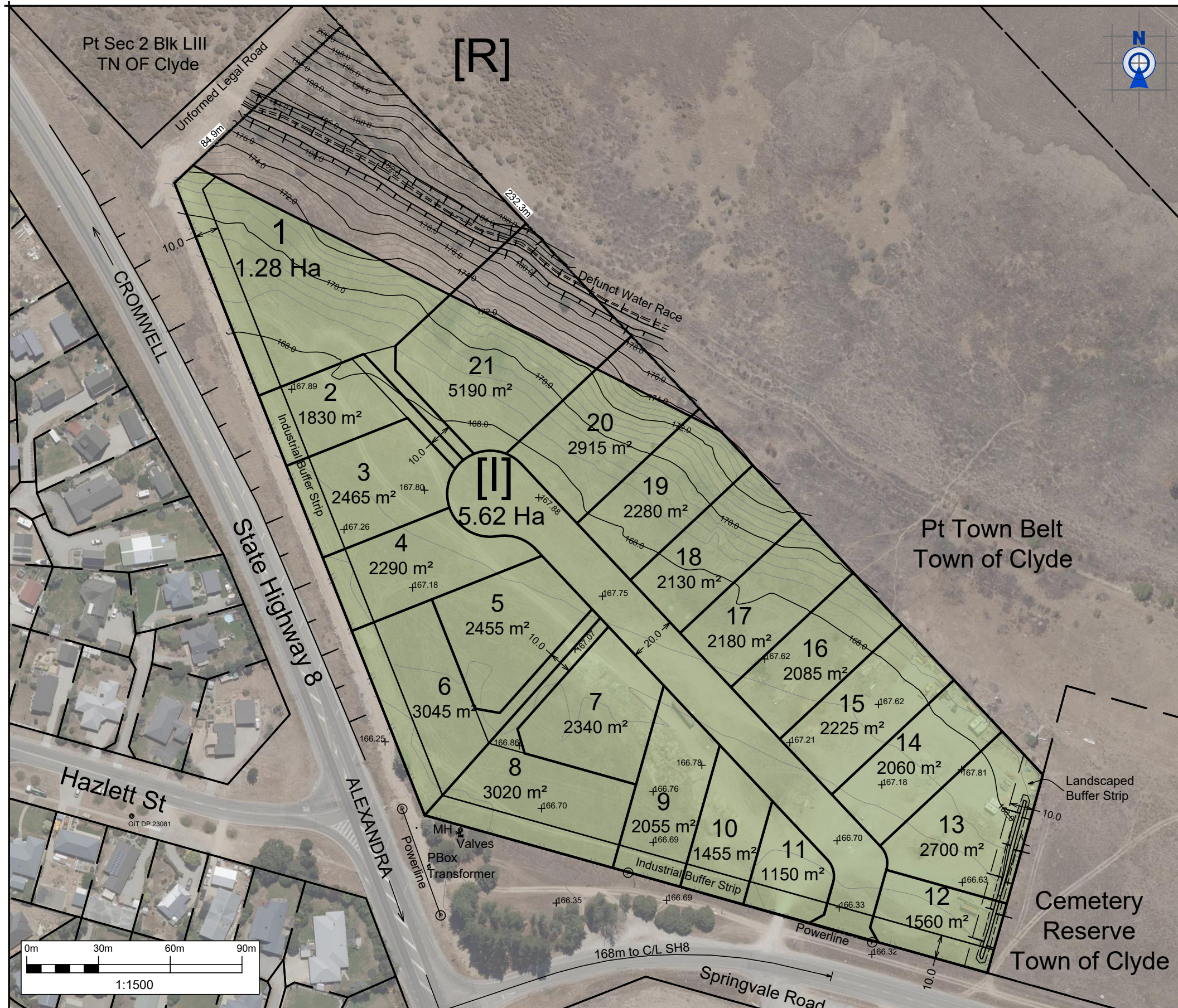
7.0 DOCUMENTS TO SUPPORT THE REQUEST

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

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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
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Alexandra 9320

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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		
Approved by:	PD		DO NOT SCALE
Job No:	Drawing No:	Sheet No:	Revision No: Date:
A5202	PLAN	1	B 27/09/2024

Appendix 'B' - Records of Title

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**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

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

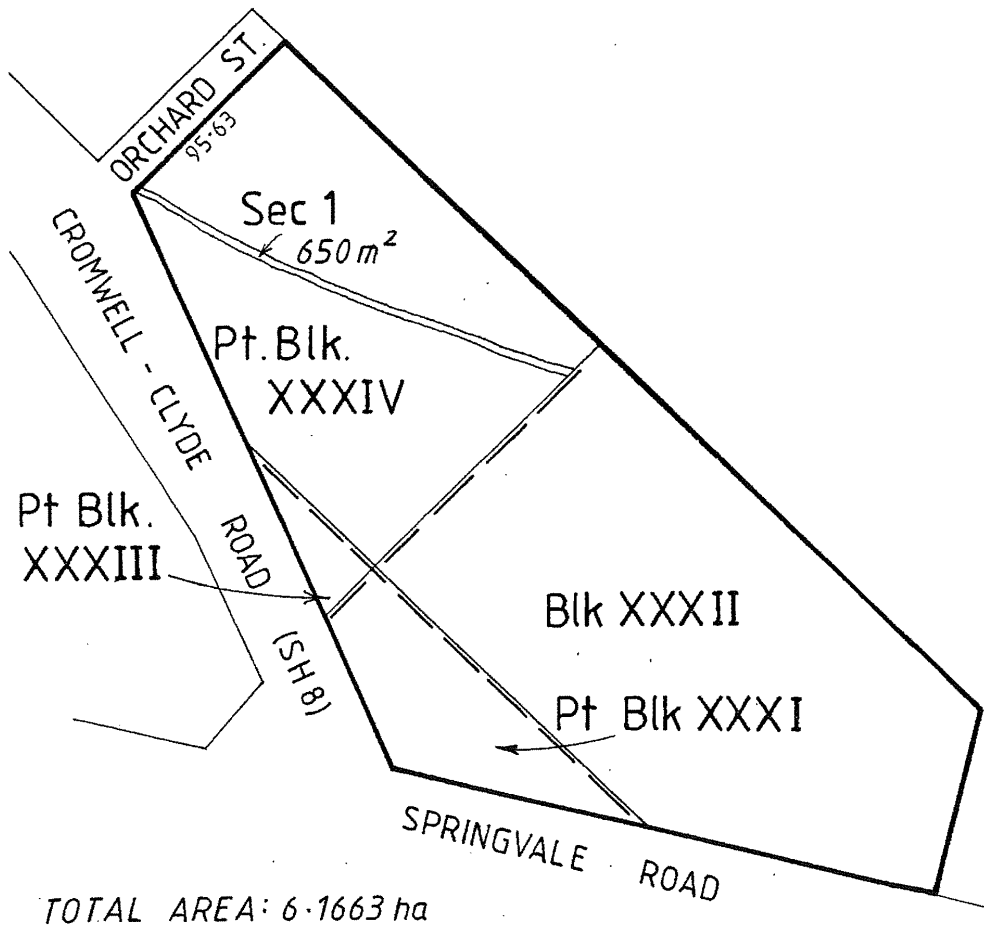
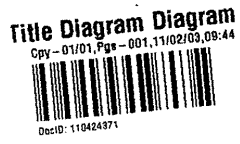
Registered Owners

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

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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

Identifier 51710





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
Total Area		6.6070 Ha	

Schedule / Memorandum

LT 600773 Schedule/Memorandum

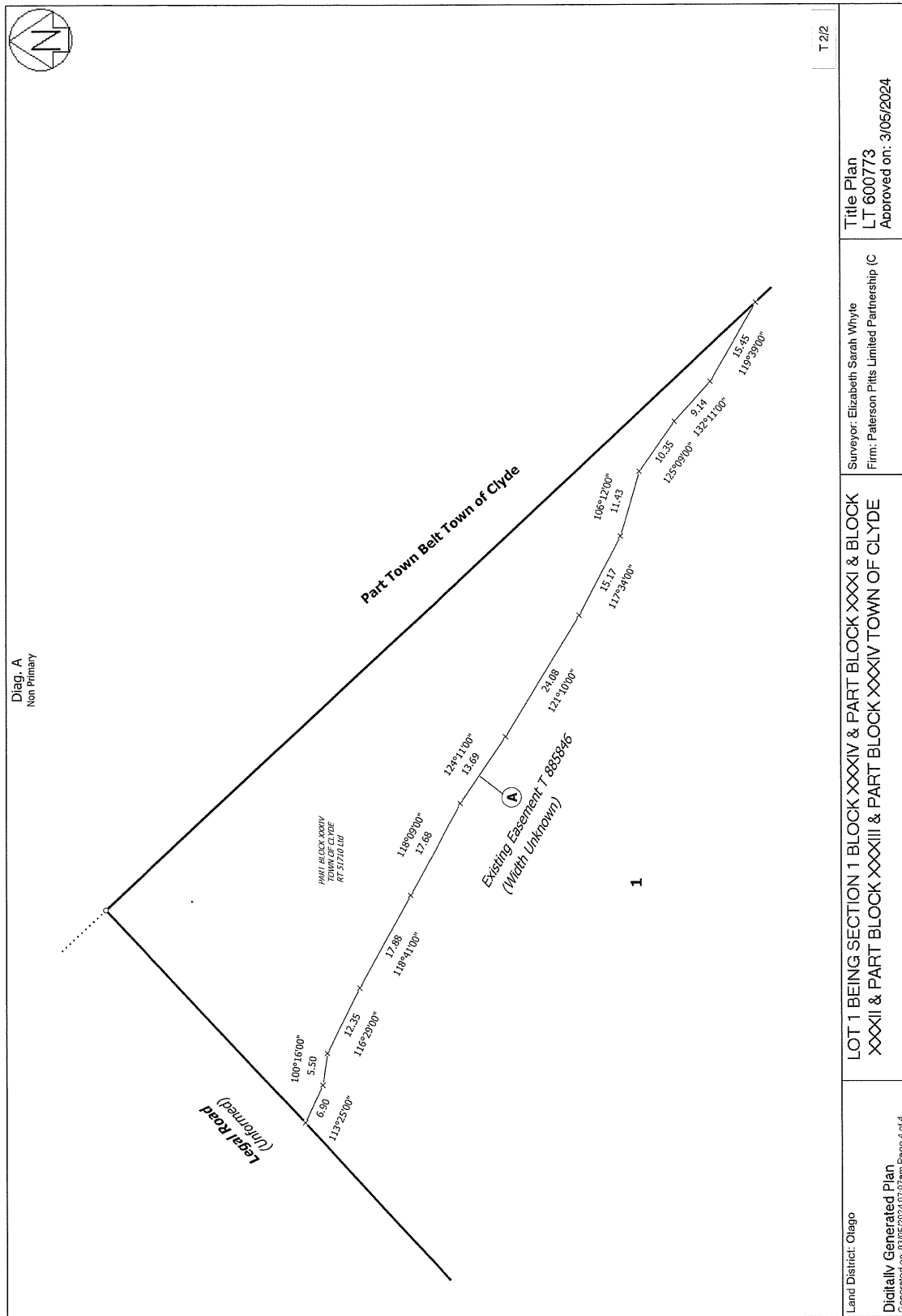
Land registration district
Otago

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



T 2/2

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

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

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

Land District: Otago
Digitally Generated Plan
Generated on: 03/05/2024 07:07 am Page 4 of 4

Appendix 'C' - District Plan Maps

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Finner Transitions (Variant) District Plan.



Re S.C. 11B
Op 3/11/24

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

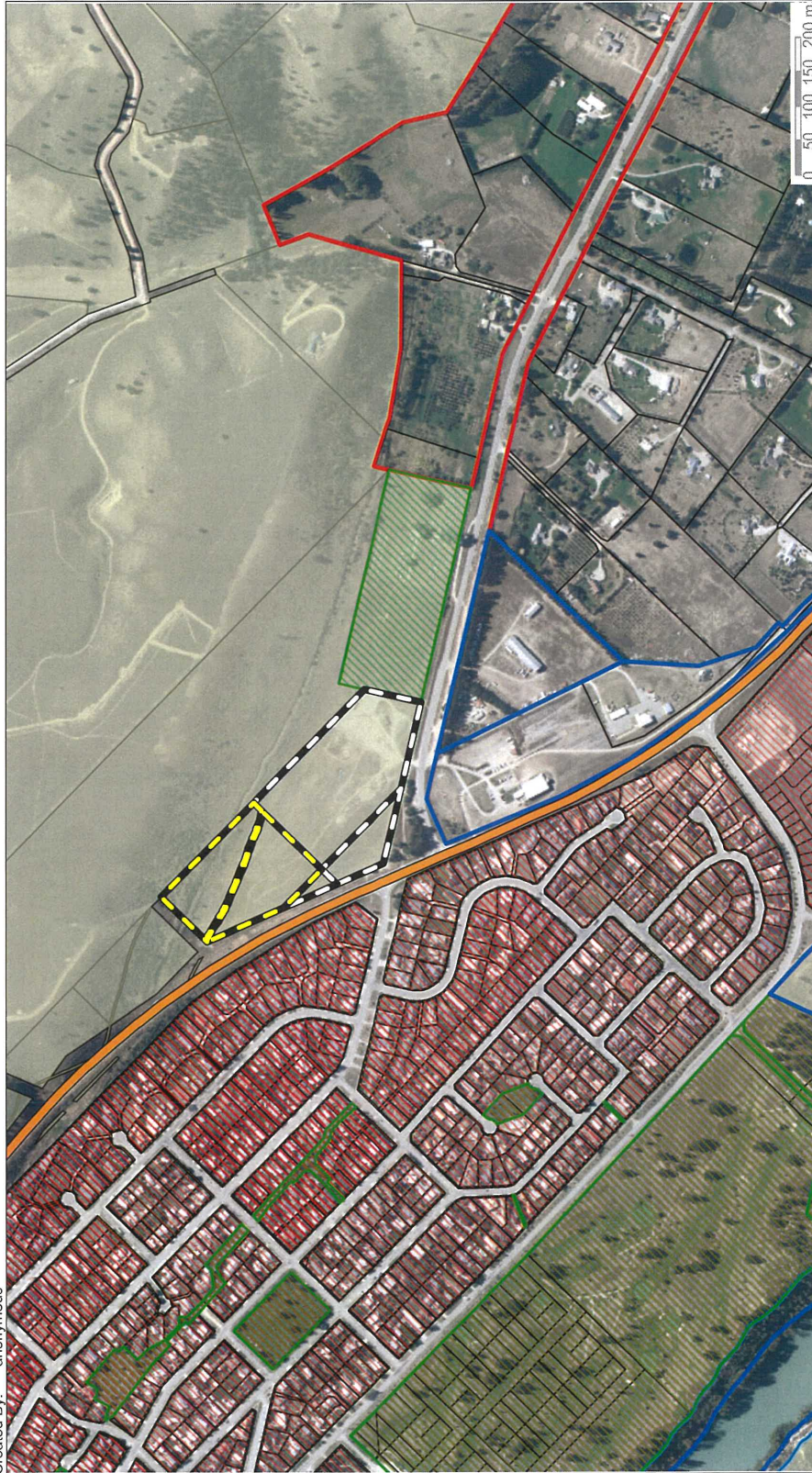
BCNZ	Broadcasting Corporation
HFS	High Frequency Station
CBC	Cromwell Borough Council
CEM	Cemetery
DSIR	Department of Scientific & Industrial Research
Au Stn	Auroral Station
FS	Fire Station
GOVT	Government purposes
H PUB	Hospital Public
HR	Historic Reserve
MWD	Ministry of Works & Development
	Railway 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
GO	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
1313646.34379065,4989910.23921172

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Appendix 'D' - Assessment of Environmental Effects

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Appendix 'E' - Sec 32 Evaluation

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Appendix 'F' - Market/Economics Assessment

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Appendix 'G' - Integrated Transport Assessment

patersons.co.nz

Appendix 'H' - Soil Contamination Assessment

patersons.co.nz

Appendix 'I' - Infrastructure Assessment

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Appendix 'J' - Geotechnical Assessment

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Appendix 'K' - Landscape Assessment

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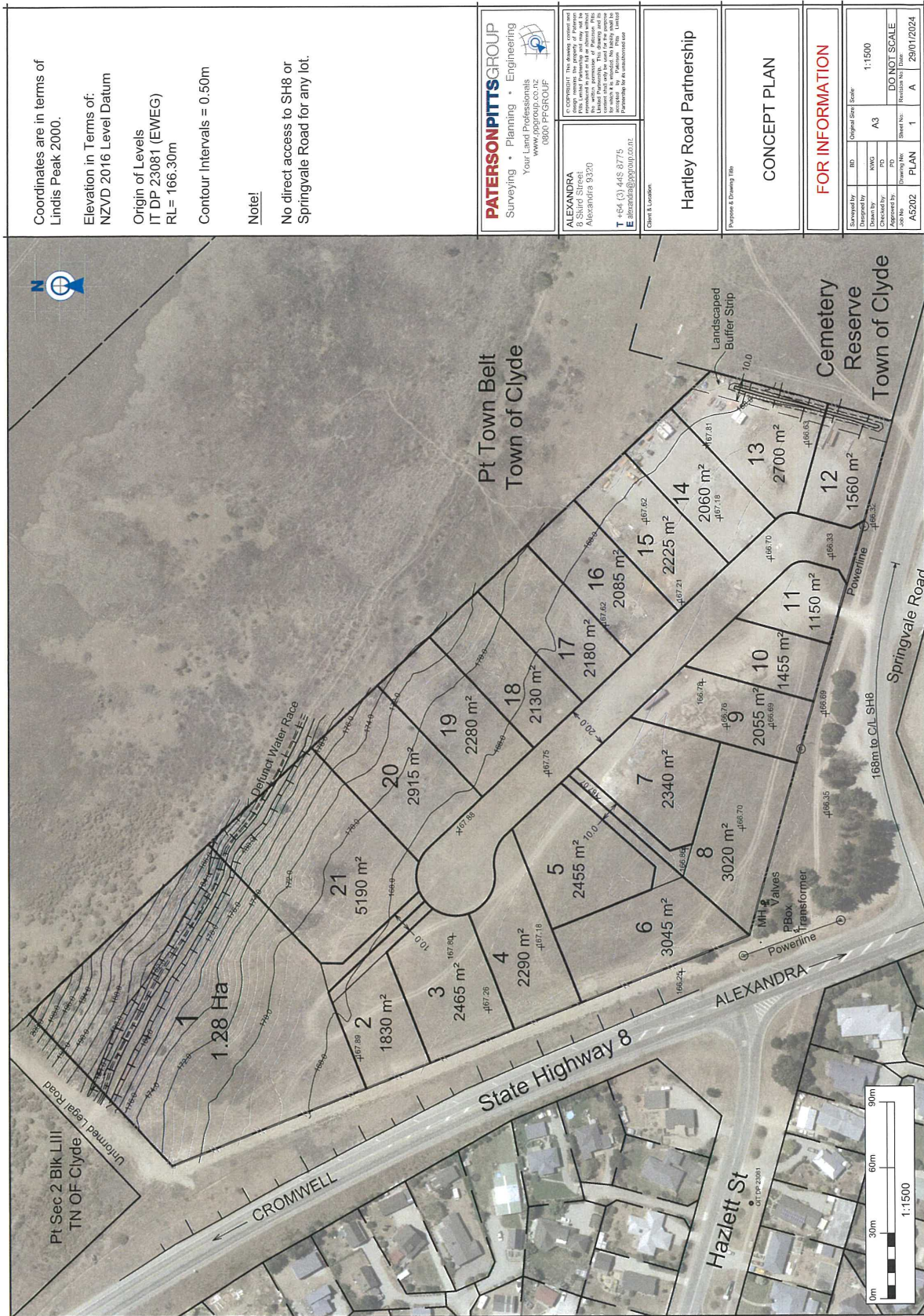
Appendix 'L' - Land Productivity

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Appendix 'A' - Land Subject to the Request

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Appendix 'B' - Records of Title

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**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

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

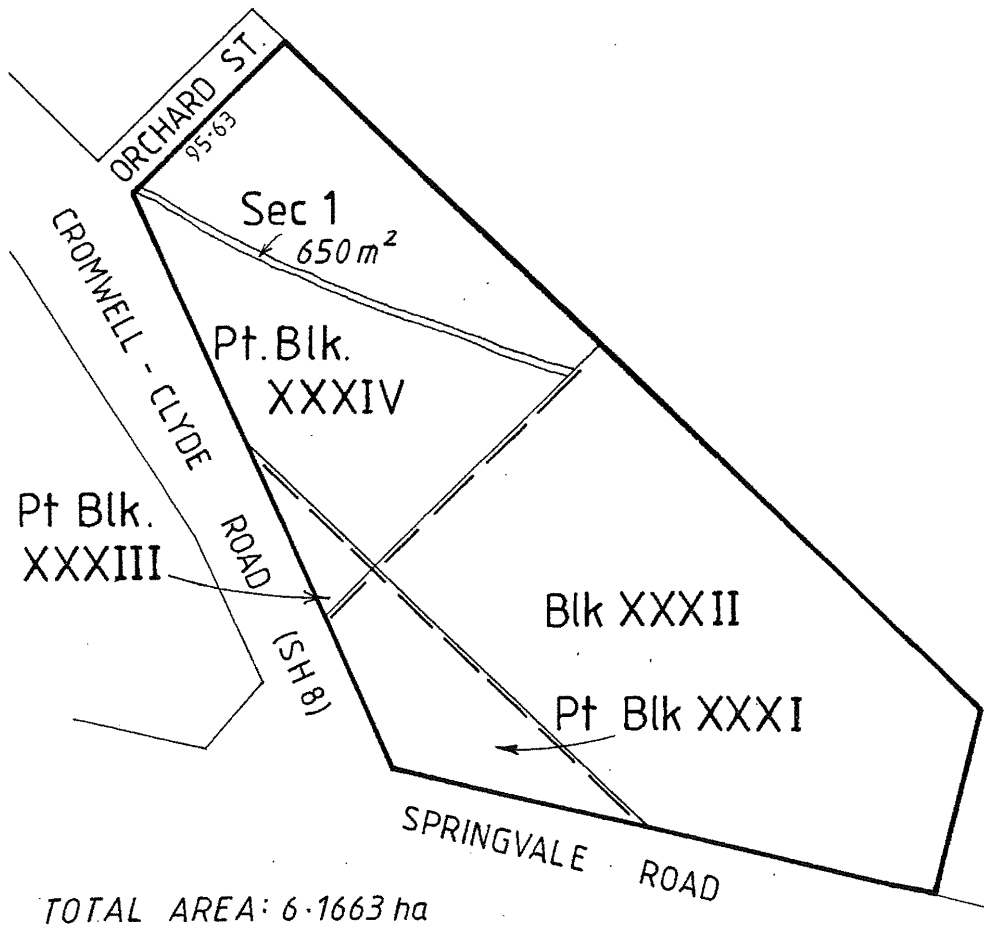
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Identifier 51710

Title Diagram Diagram
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DocID: 110424371



Transaction ID 2841618
Client Reference A5202 Hartley Road

Search Copy Dated 08/04/24 11:38 am, Page 2 of 2
Register Only



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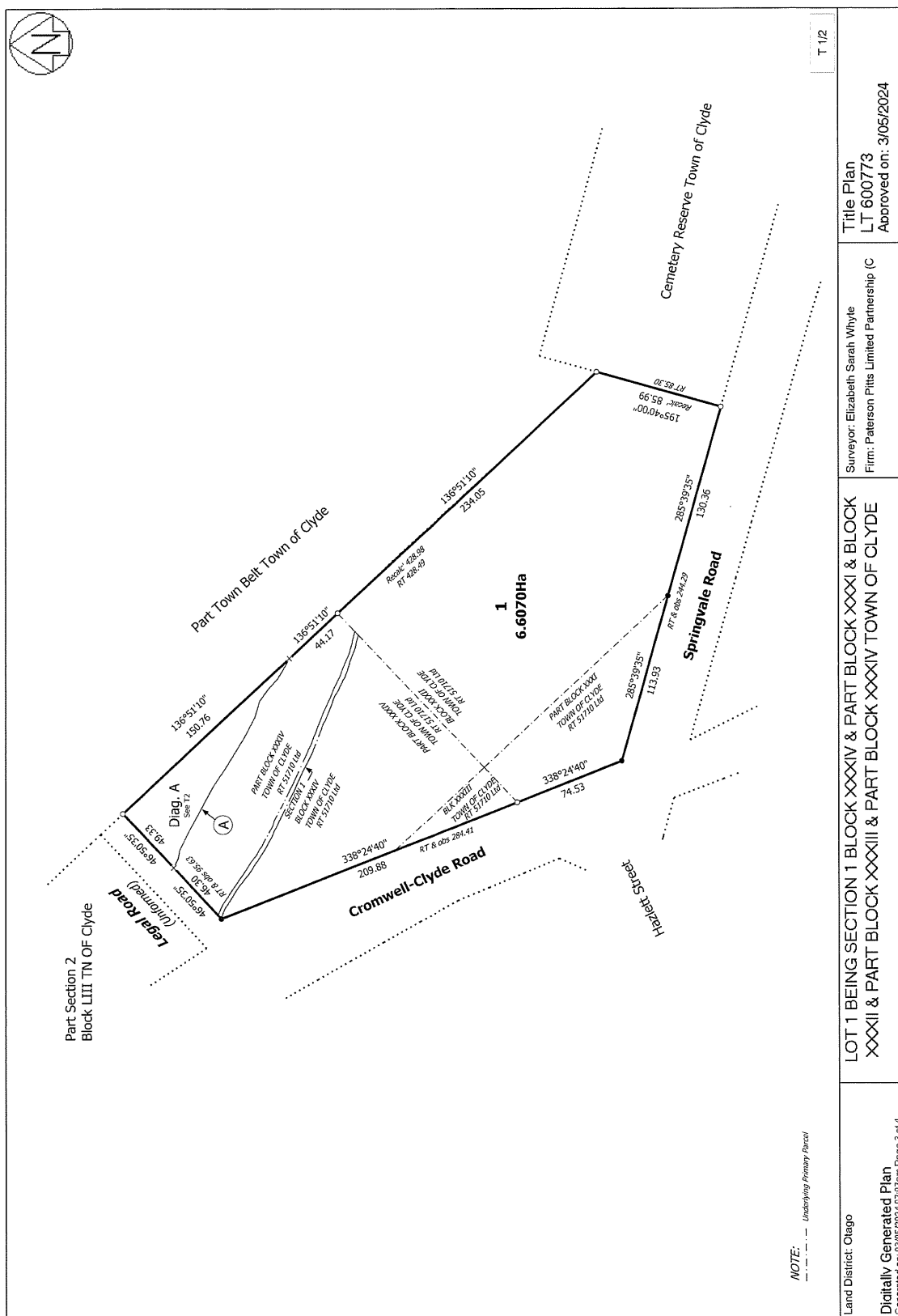
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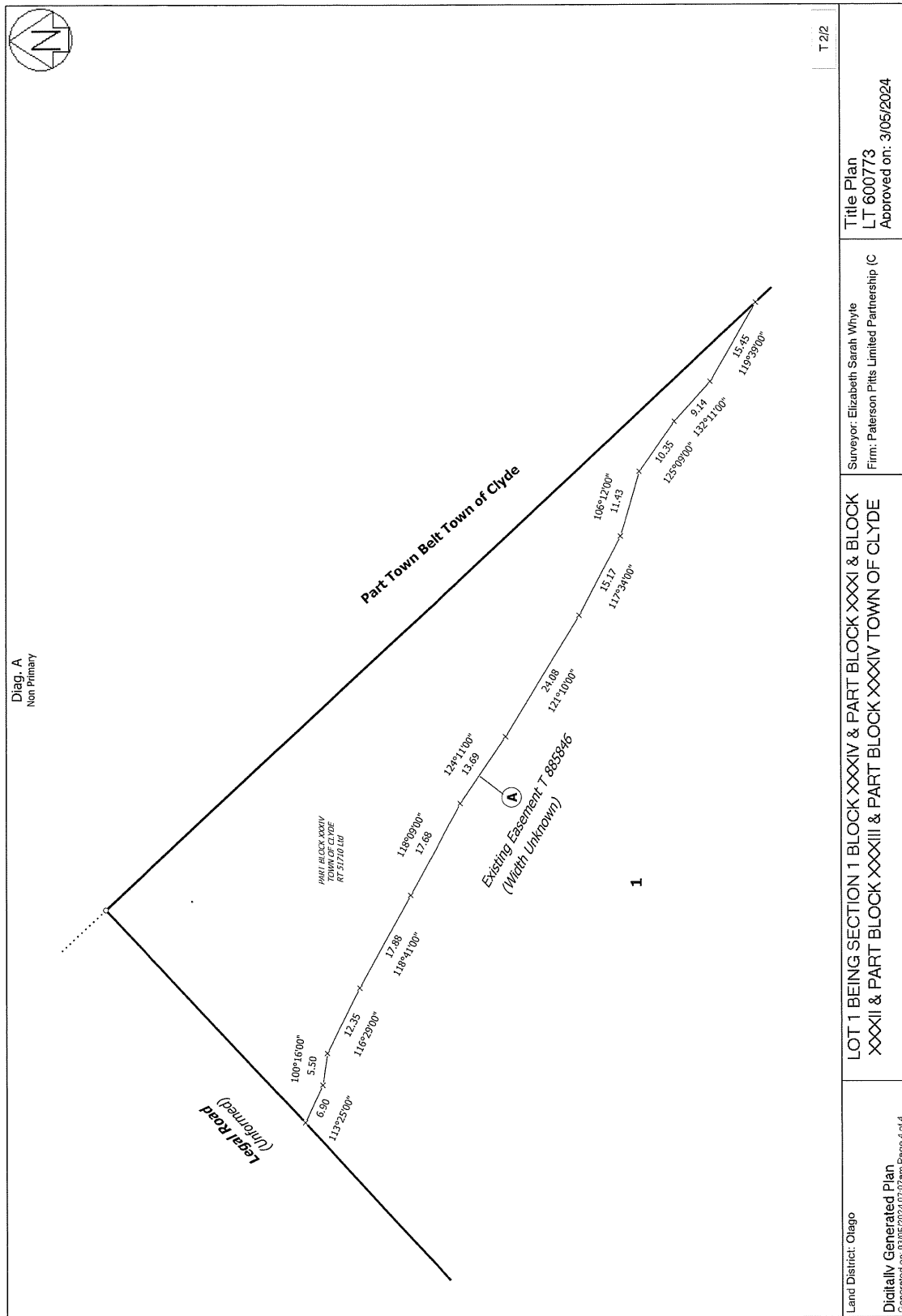


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 Firm: Paterson Pitts Limited Partnership (C)

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Land District: Otago
 Digitally Generated Plan
 Generated on: 03/05/2024 07:07:am Page 3 of 4



T 2/2

<p>Land District: Otago</p> <p>Digitally Generated Plan Generated on: 03/05/2024 07:07 am Page 4 of 4</p>	<p>LOT 1 BEING SECTION 1 BLOCK XXXIV & PART BLOCK XXXI & BLOCK XXXII & PART BLOCK XXXIII & PART BLOCK XXXIV TOWN OF CLYDE</p>	<p>Surveyor: Elizabeth Sarah Whyte Firm: Paterson Pitts Limited Partnership (C)</p>	<p>Title Plan LT 600773 Approved on: 3/05/2024</p>
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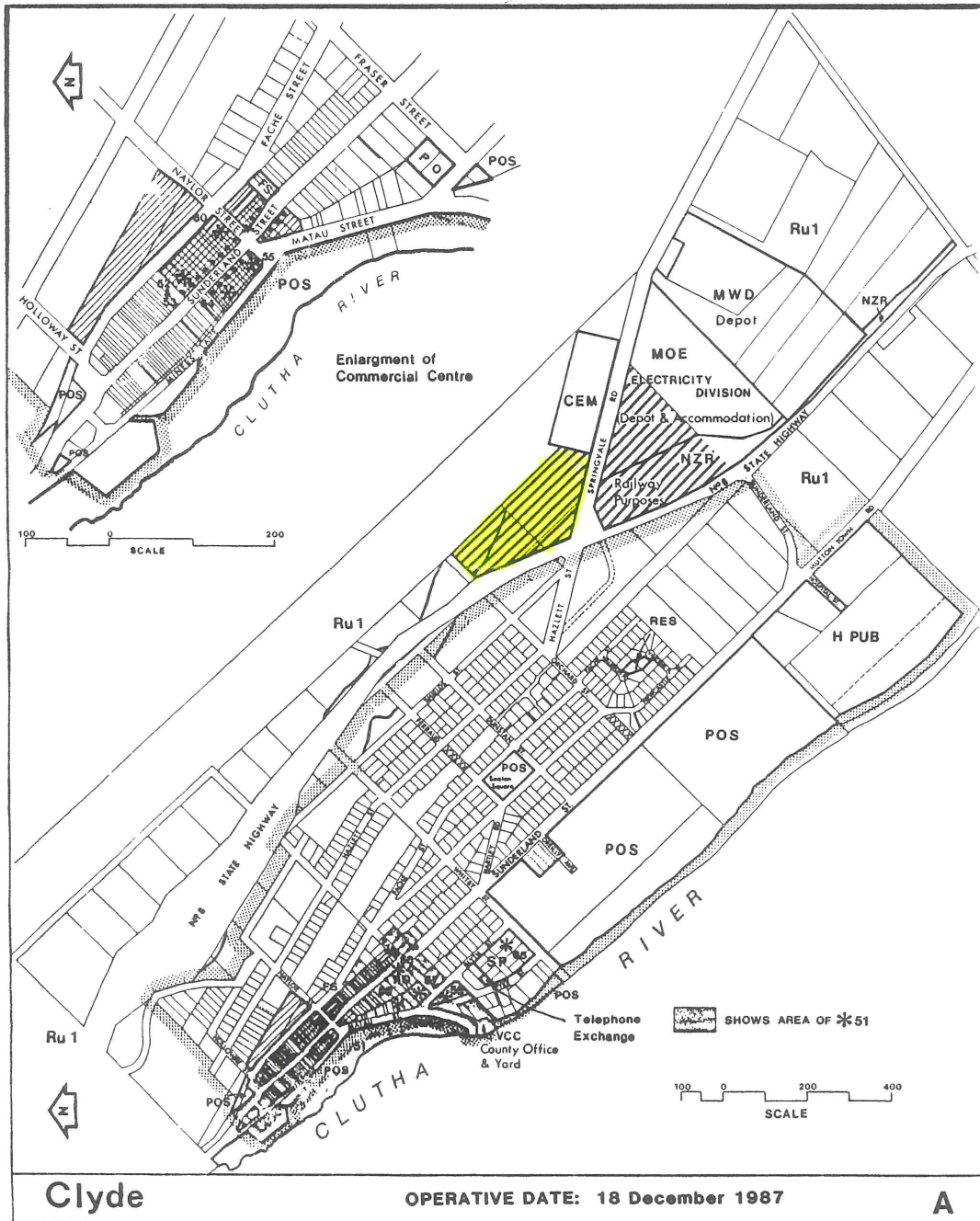
14

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Re S.C. 11B
Op 3/11/24

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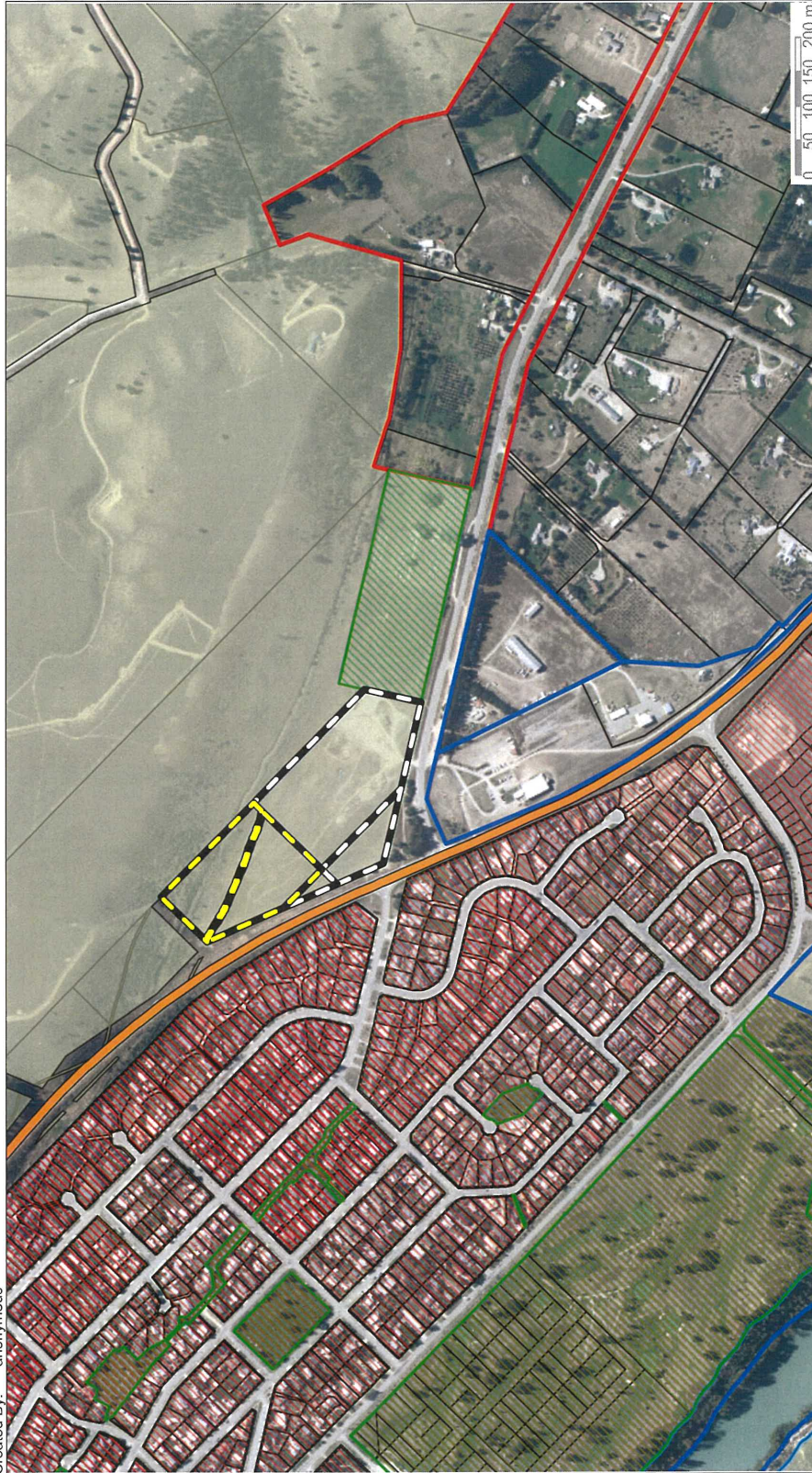
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Hartley Road Partnership ODP Zoning

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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 03 441 4715	Wānaka PO Box 283 Wānaka 9343	Cromwell PO Box 84 Cromwell 9342 03 445 1826	Alexandra PO Box 103 Alexandra 9340 03 448 8775	Oamaru Level 2 19 Eden Street Oamaru 9400 03 443 8727	Christchurch PO Box 9194 Tower Junction Christchurch 8149 03 928 1533
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DOCUMENT CONTROL

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

AUTHOR(S)

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

2

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3.0	EFFECTS RELATING TO INDUSTRIAL LAND SUPPLY & GROWTH	5
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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 principle 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 SH8 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

patersons.co.nz



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
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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>; 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

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

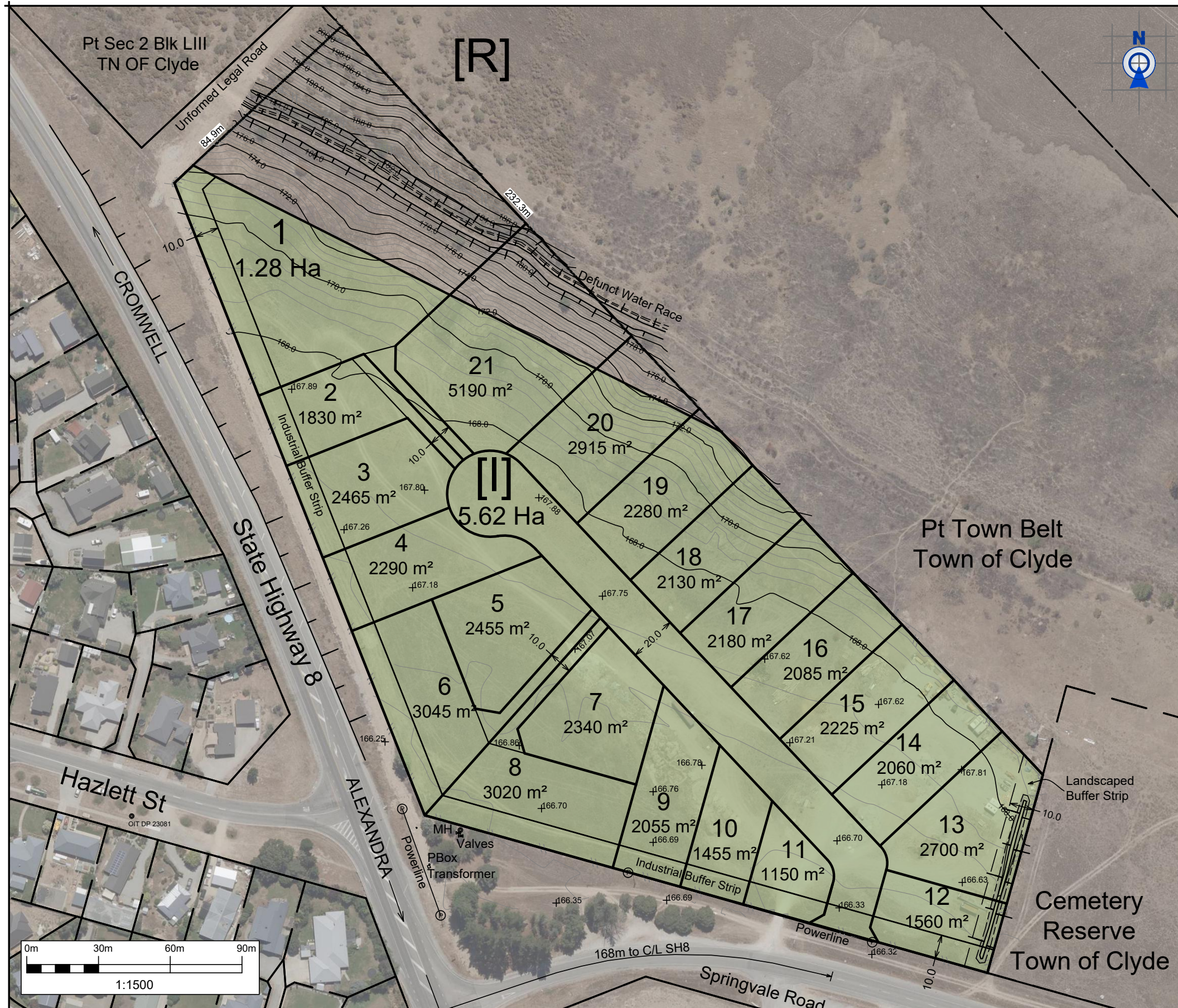
cc: Te Rūnanga o Ōtākou
Kāti Huirapa Rūnaka ki Puketeraki

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Appendix '2' – Possible Subdivision

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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
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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		
Approved by:	PD		DO NOT SCALE
Job No:	Drawing No:	Sheet No:	Revision No: Date:
A5202	PLAN	1	B 27/09/2024



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	Queenstown PO Box 2645 Wakatipu Queenstown 9349 03 441 4715	Wānaka PO Box 283 Wānaka 9343	Cromwell PO Box 84 Cromwell 9342 03 445 1826	Alexandra PO Box 103 Alexandra 9340 03 448 8775	Oamaru Level 2 19 Eden Street Oamaru 9400 03 443 8727	Christchurch PO Box 9194 Tower Junction Christchurch 8149 03 928 1533
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DOCUMENT CONTROL

Project	
Client	Hartley Road Partnership
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AUTHOR(S)

Prepared	Peter Dymock Patersons – Alexandra Office
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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	This option would require resource consents to achieve the objectives of the Request. This creates the following costs: <ul style="list-style-type: none"> (a) Non-complying subdivision and land use consents would be required to breach almost all of the Rural Resource Area Rules for industrial activity. (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. (c) Uncertain outcomes from numerous, public processes. This potential option is not reasonably practical will not be considered further in this evaluation.
Await Council District Plan Review	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. <ul style="list-style-type: none"> (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. (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. Accordingly, this option will not be considered further in this evaluation.
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.	This option is potentially efficient as it utilises and minimally modifies an existing resource area (the Industrial Resource Area) within the District Plan. This option is reasonably practical and is considered further below.

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.
---	--

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"> * The existing zoning is well understood and can be easily implemented. * Compatible with the existing zoning provisions in the District Plan. * Provides flexibility to respond to changing market and social and economic preferences. * Provides for a comprehensive range of industrial and commercial uses.
Costs	<ul style="list-style-type: none"> * Provides less certainty to Council and community as to the detailed form of development of the site.
Efficiency	<ul style="list-style-type: none"> * Only minor amendments required to District Plan, therefore less costs to Council and requester. * Avoids over-complicating the District Plan.
Effectiveness	<ul style="list-style-type: none"> * Simple and effective method of achieving the objectives of the Request.
Risk of acting (or not acting)	<ul style="list-style-type: none"> * 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.

Option 2	Re-zone the site with a bespoke zoning
Benefits	<ul style="list-style-type: none"> * Provides some certainty to Council and Community as the out come of the development of the site, typically by way of a "masterplan".
Costs	<ul style="list-style-type: none"> * Expensive to implement for both the Council and the Requestors requiring detailed design at the outset. * 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. * Users of the plan may be unfamiliar with the bespoke provisions.

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, Remedying 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 SignsPol 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
12.7.1(iii) (h) & (i), 12.7.1 (ix) 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 Appendix G has identified as already being required . The Request will generate increased traffic onto this intersection.
9.3.6 (iv) (d) 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 Appendix K , 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
2.1 to 2.2 (Kai Tahu values and interests)	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. Aukaka 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.
3.1 to 3.2 (Functions and values of Otago's ecosystems and natural resources)	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.
4.1 (Risk that natural hazards pose to Otago's communities are minimal)	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 Appendix J 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.
4.3 (Infrastructure managed and developed in a sustainable way)	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.
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)	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.
4.6 Hazardous substances, contaminated land and waste materials do not harm human health or the quality of the environment in Otago.	The PSI at Appendix H has been provided with the Request and confirms the site is suitable for industrial activity.
5.3 Sufficient land is managed and protected for economic production	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
MW – Manawhenua	See comments above under 2.1-2.2 of the oRPS.
LF-PW-P15 Stormwater and wastewater discharges	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.
LF -CS- P19 Highly Productive Land	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.
EIT-INF-P17 Urban Growth and Infrastructure	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.
EIT – TRAN -P19 Transport System Design	The Request provides for an upgrade of the intersection of SH8 and Springvale Road.
HAZ-NH-O1 Natural Hazards	As per Geotech report at Appendix J . The site is not subject to any natural hazards.
HAZ – CL Contaminated land	A PSI at Appendix H has been provided with the Request and confirms the site is suitable for industrial activity.
HCV – NH Historic heritage	The area subject to the Request does not contain any sites of Historic Heritage .
NFL-O7 Outstanding Natural Features	The area subject to the Request does not contain any outstanding natural features or landscapes.
UFD -O2 Development of urban areas UFD-O3 Strategic Planning	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

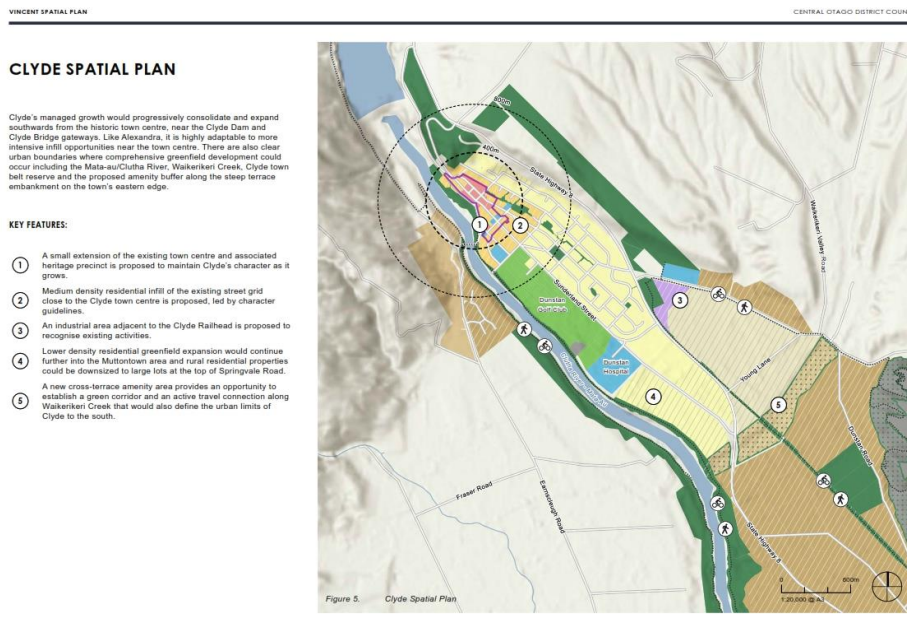
The Request fully complies with the long-term strategic objectives of the Plan in that:

- 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.



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.



Economic Assessment of Proposed Clyde Industrial Zone

Private Plan Change 23 – Central Otago District

Prepared for: Hartley Road Partnership – September 2024- Final



Economic Assessment of Proposed Clyde Industrial Zone

Private Plan Change 23 – Central Otago District

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Executive Summary

This report has been prepared by Savvy Consulting Limited (Savvy) to assess the economic costs and benefits of a request to rezone 5.62ha of land in Clyde, Central Otago District (COD), from Rural Resource Area (Rural Zone) to Industrial Resource Area (Industrial Zone). Guided by the relevant district, regional and higher-order objectives and policies related to urban expansion and providing for industrial activities, this report has assessed the current location, role and growth of existing Industrial Zones, their vacant capacity, the medium-term demand for industrial zoned land, the sufficiency of existing Industrial Zones to meet that demand, and the overall suitability of the proposed site for industrial zoning.

Generally, it is more economically efficient to consider options for expansion of existing industrial zones before creating new ones, to ensure that the adverse effects of industrial activities are consolidated in relatively few locations. However, this is not always practicable where other land uses have developed around existing Industrial Zones as they have in Alexandra, foreclosing further expansion. Further, this approach must be balanced with the need to provide for industrial activities in locations of demand.

Clyde is an urban area that already sustains industrial activity, but in the absence of a local Industrial Zone (such as provided in most other towns and settlements of the district) the Clyde community has been reliant on supply of industrial activities in Alexandra. This urban form is increasingly inefficient as Clyde grows – and Clyde *has* been identified as an area that is constrained by a lack of local employment and yet, can support substantial residential growth in the medium and long term.

Providing for future housing growth in Clyde as set out in PC19 and the Spatial Plan without also providing increased employment opportunities and business land, will not support a well-functioning urban environment. I consider that the proposed site is a suitable and effective location for an Industrial Zone. I do not consider there to be any other more practicable or feasible alternative locations to provide the equivalent development capacity in the locality. Providing a local Industrial Zone in Clyde responds to an insufficiency (absence) of industrial development capacity in the Clyde urban area and assists with an insufficiency of industrial development capacity in the Alexandra urban area in the short-medium term. Zoning of the proposed site will support the provision of at least sufficient Industrial Zone capacity in the Vincent Ward and district overall.

Having considered the economic costs and benefits of the proposal, I conclude that the long term economic benefits far outweigh any potential long term costs. I support the rezoning from an economic perspective.



1 Introduction

This report has been prepared by Savvy Consulting Limited (Savvy) to assess the economic costs and benefits of a request to rezone a piece area of land in Clyde, Central Otago District (COD), from Rural Resource Area (Rural Zone) to Industrial Resource Area (Industrial Zone). The scope of this independent economic assessment has been designed to assist with section 32A reporting as well as assessment against district and regional planning provisions, and higher order statutory documents (namely the National Policy Statement on Urban Development (NPS-UD) and National Policy Statement for Highly Productive Land (NPS-HPL), from an economic perspective.

1.1 Proposal

Hartley Road Partnership are seeking to provide for a 5.62ha (gross) Industrial Zone in Clyde at the intersection of State Highway 8 and Springvale Road. The greenfield site (Figure 1.1) sits to the east of the main urban area of Clyde, separated by State Highway 8. Not all of the site is proposed for Industrial Zone. It is also bounded to its east by the cemetery on Springvale Road and a steep hill to the rear of the site, meaning that the site is well contained.



Figure 1.1 – Site to Contain Proposed Industrial Zone Relative to Clyde Township



1.2 Policy Framework for Industrial Zoning

The following selected planning provisions help to set the context of what economic effects (costs and benefits) are of key relevance for this plan change request.

1.2.1 National Policy Statement – Urban Development

Legal advice provided by MacTodd to the hearings panel for PC19¹ indicates that Cromwell is an urban environment in accordance with the NPS-UD, and therefore COD is a Tier 3 territorial authority (TA). As a Tier 3 TA, Central Otago District Council (CODC) is “*strongly encouraged to do the things that Tier 1 or 2 local authorities are obliged to do under Parts 2 and 3 of the NPS-UD*”.² In other words, observe the objectives and policies of the NPS-UD.

Most objectives and policies relate to decisions that affect the urban environment (i.e., Cromwell). That said, Policy 2 (and related Clauses 3.2 and 3.3) simply require that Tier 3 TAs provide at least sufficient development capacity to meet expected demand for housing and for business land over the short, medium, and long term,³ with clause 3.2 referring to urban areas (not limited to the urban environment). This is also the requirement of s31(1)(aa) of the RMA. As such, my interpretation of the legal advice and the NPS-UD is that Policy 2 is the key backdrop to this economic assessment.

1.2.2 Regional Policy Statement (RPS)

Objective 4.5 and Policy 4.5.1 of the Operative RPS (2019) require that urban growth occurs in a strategic and coordinated way and integrates effectively with adjoining urban and rural environments. It directs that supply and demand of industrial zoned land is monitored, that sufficient industrial land is made available (i.e. relative to demand), and that land is used efficiently. Policy 5.3.3 acknowledges that land suitable for industrial activities is a finite resource and directs local councils to provide specific Industrial Zones.

The Proposed RPS 2021 includes similar direction. For example, UFD-02 (Development of urban areas) requires that urban areas develop and change to allow business and other non-residential activities to meet the needs of communities in appropriate locations. UFD-03 reflects the requirements of the NPS-UD – that there is sufficient development capacity for business needs in the short, medium and long term. The requirement for strategic planning to

¹ Council initiated plan change on residential zones in the district.

² Clause 1.5, NPS-UD.

³ I.e. the next 3, 10 and 30 years.

Economic Assessment of Proposed Clyde Industrial Zone



take place prior to development, expansion or redevelopment of urban areas is strengthened in the Proposed RPS.

1.2.3 Operative District Plan

The operative District Plan pre-dates both RPSs and the NPS-UD (and its predecessor the NPS-UDC). Objective 6.3.1 of the COD District Plan requires that planning decisions meet the present and reasonably foreseeable needs of people and communities in urban areas in order to promote the sustainable management of those areas. This includes providing for growth (demand) in urban areas in efficient locations when needed. Policy 6.4.2 sets out the effects that must be avoided, remedied or mitigated when enabling expansion of urban areas generally.

Objective 9.1.1 recognises that industrial activities, while an essential part of the economy that must be provided for in urban areas, have the potential to adversely affect the amenity values of neighbouring land uses, or create reverse sensitivity effects on other land uses. Policy 9.2.1 and 9.2.3 therefore direct planning decisions to provide appropriate locations for the growth of industrial activities where effects can be managed.

My interpretation of the District Plan is that there is no strategic guidance on which urban areas should include an Industrial Zone(s). Rather, where there is a need to provide Industrial Zone capacity in urban areas to provide for industrial activity demand, the emphasis is on finding an appropriate location for that zone where adverse effects (including reverse sensitivity effects) can be managed. That said, the Vincent Spatial Plan (2022) now gives effect to the strategic planning requirement from the RPS for urban growth in Clyde, Alexandra and Omakau/Ophir and will guide future changes to the District Plan. This is discussed later in the report with respect to strategic planning for new industrial zones.

1.2.4 Summary of Relevant Economic Effects to Consider

Based on the above planning and policy framework, the key economic concepts that need to be addressed for this plan change relate to demand for industrial development capacity (zoning) over the short, medium and long term; the location of that demand and where it is most efficiently met; the capacity of existing and identified future industrial zones; the sufficiency of existing and identified industrial zones to meet projected demand; the suitability of the proposed site for industrial development (i.e. does it represent feasible development capacity); and the economic costs and benefits of the proposal to test if it is an efficient use the land and supports an efficient urban form.



1.3 Report Scope

To meet the requirements set out above, the approach of this economic assessment considers:

- a) the town and settlement pattern of the district and the economic inter-dependencies of those areas, including how they are currently served by industrial zones;
- b) the relative function/role of existing industrial zones (relative to the towns/settlements they are located in and relative to each other);
- c) the vacant capacity of existing and identified future industrial zones (as an indication of their ability to provide for future growth);
- d) the demand for industrial zoned land, driven by projected population and dwelling growth;
- e) the indicative sufficiency of industrial zoned and identified land relative to locations of demand;
- f) the economic costs and benefits of the proposed zoning, taking into account any forgone primary productive capacity; and
- g) conclusion on the efficiency of the proposed zoning from an economic perspective.

1.3.1 Data Sources

This report has considered and/or relied on a range of data sources to inform the analysis. This includes:

- CODC's 2020 and 2022 growth projections prepared by Rationale,
- CODC's GIS data for Operative and notified PC19 zoning,
- the Operative District Plan,
- PC19 Section 42A report (2023) and PC18 S32A Report,
- CODC's Vincent Spatial Plan 2022,
- StatisticsNZ population estimates, projections, residential consents and business demography data,
- aerial imagery, and
- the Primary Production Capacity Report (Patersons, 2024).



2 Existing & Planned Industrial Zones

2.1 Study Area and Urban Structure

The study area for this assessment is the whole of COD, although particular focus is given to the locations where there are operative Industrial Zones and the area covered by the recent Vincent Spatial Plan (2022) prepared by CODC. That is, the townships of Clyde, Alexandra and Omakau within Vincent Ward.⁴ Figure 1.2 identifies the locations of the main towns/settlements in COD. While Clyde and Alexandra are relatively close to each other, the district is characterised by a small number of urban and rural centres spread over a large geographic area.

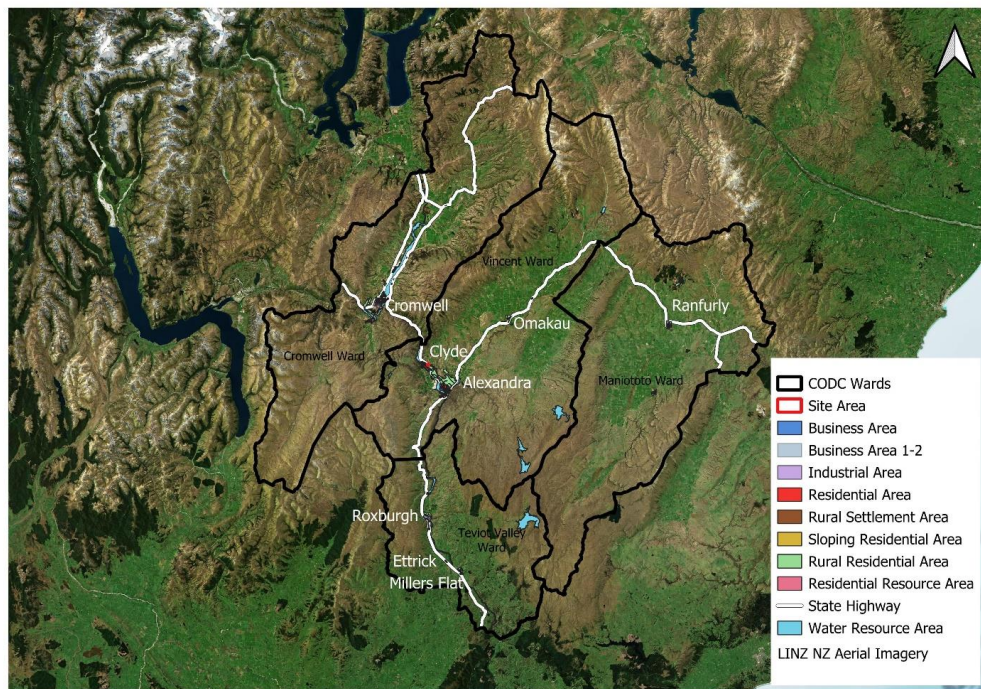


Figure 2.1 – Study Area for Assessment – Main Towns & Settlements of COD

In terms of an urban hierarchy, Cromwell, Alexandra, Ranfurly and Roxburgh are the main centres within each ward. Cromwell has taken over as the largest centre in the district in

⁴ StatisticsNZ 2023 Ward Boundaries.



Economic Assessment of Proposed Clyde Industrial Zone

population terms⁵ (although not in employment terms) and serves primarily the Cromwell Ward.⁶ Alexandra is the second largest centre in population terms and the largest in employment terms and serves the higher order needs of those living in the Vincent, Maniototo and Teviot Valley Wards – so a much larger geographic catchment. In population terms, Clyde is the third largest of the discrete townships/settlements in the district (Figure 2.2) in population terms.

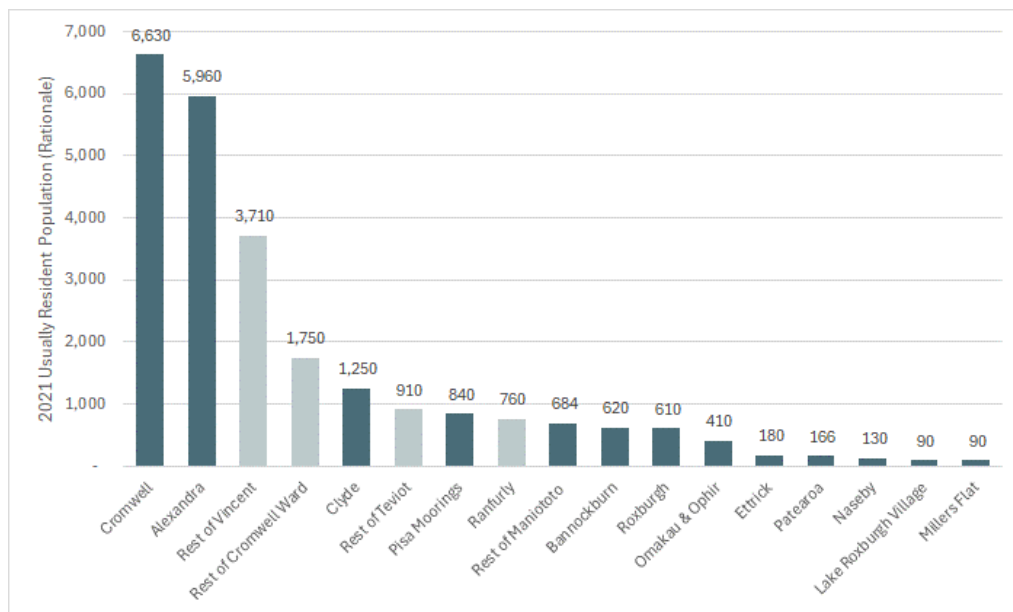


Figure 2.2 –COD Towns & Settlements Usually Resident Population 2021 (Rationale)

This urban structure is directly relevant to the role of Industrial Zones within the district, including where growth in demand for Industrial Zones is most efficiently met.

2.2 Operative District Plan Urban Area Zoning

Table 2.1 provides a list of the main towns and settlements in COD that contain either Residential Zoning or Settlement Zoning. The ward that they fall within is noted, and for completeness, the ‘rest of ward’ area is represented (and which may include rural settlements not otherwise listed).

⁵ StatisticsNZ 2023 Estimates.

⁶ Cromwell also has some economic and workforce linkages with Queenstown and Wanaka in Queenstown Lakes District.



Economic Assessment of Proposed Clyde Industrial Zone

Some key trends are evident in the approach to zoning in the operative District Plan. This includes that most urban areas include some Rural Residential zoning adjoining or near the Residential or Settlement Zone. This is appropriate to provide for a range of dwelling types to meet community needs.

Table 2.1 – Current Operative Plan Zone Provision by Urban Area

Ward	Town/Settlement	Zone Category *				
		Residential	Rural Settlement	Rural Residential (in close proximity)	Business	Industrial
Cromwell	Cromwell	Y	-	Y	Y	Y
Cromwell	Pisa Moorings	Y	-	-	PPC21	PPC21
Cromwell	Bannockburn	Y	-	Y	-	-
Cromwell	Rest of Cromwell Ward	-	Y	Y	-	-
Vincent	Alexandra	Y	-	Y	Y	Y
Vincent	Clyde	Y	-	Y	Y	-
Vincent	Omakau & Ophir	Y	-	Y	Y	Y
Vincent	Rest of Vincent	Y	Y	Y	-	-
Maniototo	Ranfurlly	Y	-	Y	Y	Y
Maniototo	Naseby	Y	-	Y	Y	Y
Maniototo	Patearoa	Y	-	Y	-	Y
Maniototo	Rest of Maniototo	-	Y	Y	-	-
Teviot Valley	Roxburgh	Y	-	Y	Y	Y
Teviot Valley	Lake Roxburgh Village	Y	-	-	-	-
Teviot Valley	Ettrick	Y	-	-	-	Y
Teviot Valley	Millers Flat	Y	-	Y	-	Y
Teviot Valley	Rest of Teviot	-	-	-	-	-

Source: CODC Operative Zone Maps. * Rural zone excluded.

Next, seven of the urban areas include a Business Zone. Where an urban area does not include a Business Zone, they are generally dependent on the nearest Business Zone for convenience retail and service needs. As discussed above, higher order retail and service needs are generally directed to either Cromwell or Alexandra (whichever is closest).

While not every settlement can sustain a viable Business Zone, the operative District Plan has sought to provide most towns and settlements with an Industrial Zone. Nine urban areas in the district include a local Industrial Zone (Table 2.1). Not only does this concentrate employment opportunities within urban areas (close to places of residence), but it consolidates industrial activities that might otherwise be dispersed in the Rural Zone⁷ into a suitable location where effects can be appropriately managed (and agglomeration benefits can be realised for co-located businesses).

⁷ Or seek to take up capacity in a Business Zone (where enabled or approved).



Economic Assessment of Proposed Clyde Industrial Zone

The only areas that do not include an Industrial Zone are Pisa Moorings⁸ and Bannockburn in Cromwell Ward, Clyde in the Vincent Ward and Lake Roxburgh Village in the Teviot Valley Ward, with Clyde being larger than each of these areas in terms of resident population, and much larger than some towns and settlements that already contain Industrial Zones.

Currently, any demand for industrial activities arising from homes or businesses in or near Pisa Moorings and Bannockburn will be met in Cromwell. Any demand arising in or near Clyde will be met in Alexandra and any demand arising in or near Roxburgh Village will be met in Roxburgh.

At the same time, there will be some industrial activities located in the two main towns (Cromwell and Alexandra) that service much wider catchments (in addition to local demand), in the same way as the Business Zones in these towns function at the top of the commercial centre hierarchy. As such, a portion of industrial demand from each urban area can be met locally (if a zone is provided) and a portion of demand will be met in the Cromwell and Alexandra Industrial Zones (whichever is closest).

2.2.1 Current Private Plan Changes

While Pisa Moorings does not currently include a Business Zone or its own local Industrial Zone (Table 2.1), PPC21 (Parkburn Quarry) seeks to include provision for both zone types, in addition to further Residential Zone capacity, to provide for local demand and projected growth in this urban area. PPC21 will significantly increase the self-sufficiency of the Pisa Mooring community and reduce the need for road travel to Cromwell for work and convenience shopping.

In September 2024 CODC accepted the independent hearings panel's recommendation to approve PPC21. With PPC21 approved, the only urban areas not provided with a local Industrial Zone will then be Clyde, Bannockburn and Roxburgh Village. At the time of finalising this report, PPC21 had yet to be included in the operative District Plan. On that basis, the analysis in the remainder of this report does not include the Parkburn Quarry Industrial Zone, but its contribution is acknowledged where relevant.

2.3 Current Role of Industrial Zones & Recent Growth

Table 2.2 summarises, in a general sense, the role of the various Industrial Zones provided throughout COD. As stated above, all Industrial Zones have a local role - serving the household and business needs of the local and surrounding community - but Alexandra and

⁸ Discussed below.

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Cromwell Industrial Zones have a wider catchment role. This wider role arises from their strategic location (geographically) within the district, and from being within urban areas with the largest workforce and supporting infrastructure. The large local demand in these two main townships sustains a greater number of industrial activities, but the strategic location makes it efficient for some of those businesses to also service a wider catchment from a centralised location.

Table 2.2 – Functional Role of Existing Industrial Zones

Ward	Town/Settlement	Existing Industrial Zone	Industrial Zone Role / Catchment	Main Industrial Service Hub
Cromwell	Cromwell	Y	Local & Ward	Cromwell
Cromwell	Pisa Moorings	-	N/A	Cromwell
Cromwell	Bannockburn	-	N/A	Cromwell
Cromwell	Rest of Cromwell Ward	-	N/A	Cromwell
Vincent	Alexandra	Y	Local & Ward	Alexandra
Vincent	Clyde	-	N/A	Alexandra
Vincent	Omakau & Ophir	Y	Local	Alexandra
Vincent	Rest of Vincent	-	N/A	Alexandra
Maniototo	Ranfury	Y	Local	Alexandra
Maniototo	Naseby	Y	Local	Alexandra
Maniototo	Patearoa	Y	Local	Alexandra
Maniototo	Rest of Maniototo	-	N/A	Alexandra
Teviot Valley	Roxburgh	Y	Local	Alexandra
Teviot Valley	Lake Roxburgh Village	-	N/A	Alexandra
Teviot Valley	Ettrick	Y	Local	Alexandra
Teviot Valley	Millers Flat	Y	Local	Alexandra
Teviot Valley	Rest of Teviot	-	N/A	Alexandra

Source: CODC Operative Zone Maps, Savvy.

The following sub-section provides a closer look at the two main industrial zones in COD – Cromwell and Alexandra. This analysis is based on business and employment data reported by StatisticsNZ⁹ at a Statistical Area 1 (SA1) level.¹⁰

SA1 boundaries do not perfectly match the Industrial Zone boundaries and as such, may include land uses outside the Industrial Zone that contain businesses and employment. The SA1 boundaries are however a relatively close match with the Industrial Zones in these two main towns and while not all business/employment activity outside the Industrial Zone can be identified and removed, primary production activity (farming and horticulture) has been

⁹ Business Demography Statistics.

¹⁰ SA1 2018 boundaries have been used.

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removed from the data where this related to rural land captured within the SAIs.¹¹ Services to agriculture, forestry and hunting have however been retained in the data (where applicable).

For all other areas with an Industrial Zone, the SA1 boundaries covered land substantially larger than the Industrial Zone, and often the whole settlement and extensive rural areas. As such, there is too much uncertainty around Industrial Zone activity to provide meaningful analysis of those local Industrial Zones.

2.3.1 Cromwell Industrial Zone

Appendix A contains a detailed table of the analysis for the Cromwell Industrial Zone. Key findings for this zone include:

- There were an estimated 269 businesses in the Industrial Zone in February 2023, which is 68 (34%) more businesses (net) than there was in 2018.
- Approximately 75% of those businesses (47 total) fall within broad industries¹² that may be considered more likely to seek an Industrial Zone location than not.¹³ This group of businesses grew by 30% since 2018, suggesting that businesses in other sectors (while making up only 25% of total businesses) were growing at an above average rate in the Industrial Zone.
- The two industries experiencing the largest business count growth 2018–2023 were construction and rental, hiring and real estate services, with growth of 22 and 14 businesses respectively.
- Construction businesses make up 21% of all businesses in the Industrial Zone in 2023, followed by rental, hiring and real estate services (16%), wholesale trade (15%) and manufacturing businesses (13%).

¹¹ Other data cleaning included removal of hydro power generation where this was appearing (perhaps incorrectly) within the SAIs for the Alexandra Industrial Zones, and removal of most Shearing Services employment where the shearing service business was the place where all shearing gang employment was registered, but is unlikely to be based within the zone.

¹² Using 1-digit ANZSIC categories (albeit only the support services activity within Agriculture, Forestry and Fishing).

¹³ For the purposes of this report, this includes services to agriculture, forestry and hunting, manufacturing, electricity, gas, water and waste services, construction, wholesaling, transport, postal and warehousing. I have also included the total Rental, hiring and real estate services industry on the basis that this includes vehicle hire, machinery and equipment hire, event hire and scaffolding businesses, even though real estate and some hiring services would be expected in business zones and not industrial zones.



Economic Assessment of Proposed Clyde Industrial Zone

- Total estimated employment in the Industrial Zone in 2023 was 1,834.¹⁴ This increased by 237 (in net terms)¹⁵ or 15% from 2018.
- Average business size in the Industrial Zone has reduced slightly from 8 workers/business in 2018 to just under 7 workers/business in 2023.
- Employment in industries considered more likely to seek an Industrial Zone location than not accounted for 82% of total estimated employment in the zone.
- The two industries experiencing the largest employment count growth 2018-2023 were wholesaling and construction, with growth of 111 and 44 workers respectively.
- Construction businesses make up 32% of all employment in the Industrial Zone in 2023, followed by manufacturing (17%), and wholesaling (16%).
- The Industrial Zone plays a key role in the overall township, accounting for 28% of all businesses and 46% of all employment in Cromwell. Business growth in the Industrial Zone (which is the metric that relates strongly to take up of vacant land) is growing at an above average rate compared to growth in other zones that enable business activity (namely the Business Zones). While accounting for 28% of all businesses, the Industrial Zone accounted for 40% of all Cromwell business growth since 2018.

In light of the strong recent growth in take up of the Industrial Zone in Cromwell, and strong projected growth, PC18 (initiated by Council in response to the Cromwell Master Plan) added substantial development capacity adjoining the existing Industrial Zone.

2.3.2 Alexandra Industrial Zones

There are two discrete areas of Industrial Zoning in Alexandra, on the east and west side of the township. Appendix A contains a detailed table of the analysis for the combined Alexandra Industrial Zones. Key findings for this zoned land include:

- There were an estimated 121 businesses in the Industrial Zone in February 2023 (much less than in Cromwell), which is 9 (8%) more businesses (net) than there was in 2018.
- Approximately 61% of those businesses (74 total) fall within broad industries that may be considered more likely to seek an Industrial Zone location than not. This group of businesses grew by 10% since 2018, suggesting that businesses in other sectors (which

¹⁴ Employment is measured as total jobs – comprising the StatisticsNZ employee count plus estimated working proprietors and sole traders.

¹⁵ Refer Appendix A. There were decreases in some industries and growth in others.

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make up the remaining 39% of total businesses in the Industrial Zones) were growing at a below average rate.

- The three industries experiencing the largest business count growth 2018-2023 were professional, scientific and technical services (8 additional businesses) and construction and rental, hiring and real estate services, with growth of 4 businesses each over that period.
- Rental, hiring and real estate service businesses make up 18% of all businesses in the Industrial Zone in 2023, followed by construction and professional, scientific and technical services on 16% each.
- Total estimated employment in the Industrial Zones in 2023 was 1,049. This increased by 22 (in net terms) or 2% from 2018.
- Average business size in the Industrial Zone has reduced slightly from 9.2 workers/business in 2018 to 8.7 workers/business in 2023. Businesses in the Alexandra Industrial Zones are on average, slightly larger than businesses in Cromwell's Industrial Zone.
- Employment in industries considered more likely to seek an Industrial Zone location than not accounted for 68% of total estimated employment in the zone.
- The two industries experiencing the largest employment count growth 2018-2023 were construction and food services, with growth of 102 and 29 workers respectively.
- Construction businesses make up 48% of all employment in the Industrial Zones in 2023. All other industries accounted for between 0%-8% each of the total zone employment.
- The Industrial Zone plays a moderate role in the overall township, accounting for 15% of all businesses and 23% of all employment in Alexandra. Business growth in the Industrial Zones (which is a key driver in the take up of vacant land) is growing at an above average rate compared to growth in other zones that enable business activity (namely the Business Zone). While accounting for 15% of all businesses, the Industrial Zone accounted for 27% of all Alexandra business growth since 2018 (albeit that growth was minor).

Figure 2.3 compares the employment composition of the Industrial Zones in Cromwell and Alexandra in 2023. The analysis shows that both zones have a broad mix of business types – suggesting relatively enabling zone provisions. Construction related businesses dominate the Industrial Zones in Alexandra. While construction has a key role in Cromwell's Industrial Zone, manufacturing (which includes processing), wholesaling and transport/warehousing are also



a key focus in Cromwell – with much of this driven by the surrounding horticultural activity and its strategic location on the State Highway network.

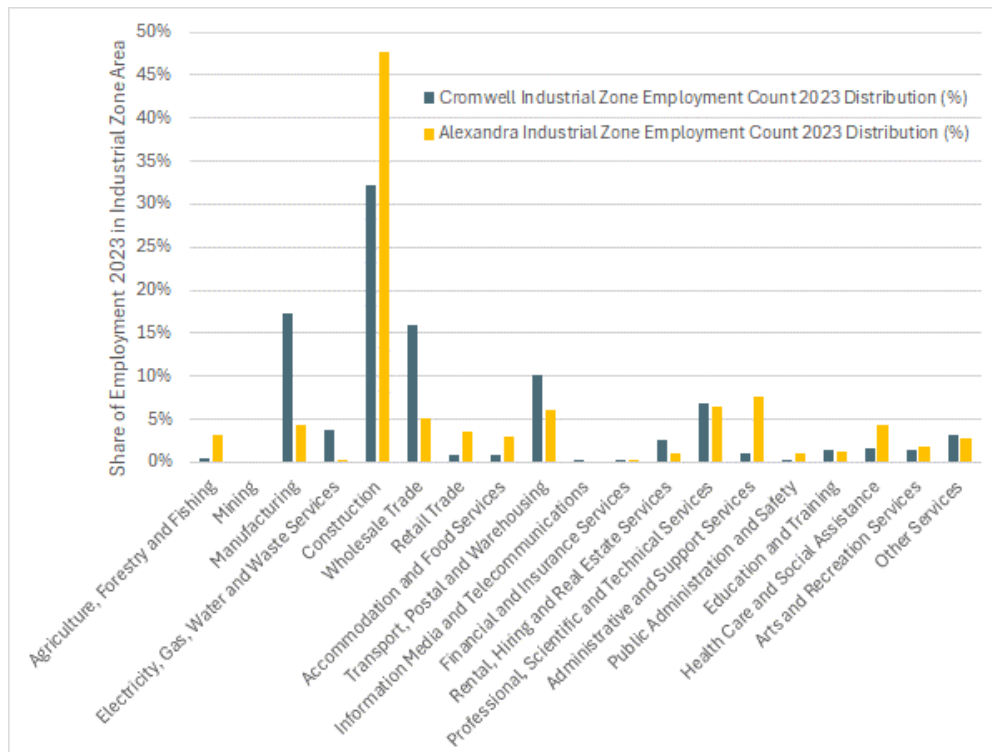


Figure 2.3 – Comparison of Employment Mix in Cromwell and Alexandra Industrial Zone 2023

2.4 Capacity for Growth in Industrial Zones

The following provides a desktop assessment of estimated vacant land capacity in existing Industrial Zones across COD. This analysis has been carried out at the primary parcel level. Where a parcel contained more than one zone, the parcel area was split, and only the Industrial Zone portion was retained. Parcels have also been ‘cookie-cut’ by designations within the Industrial Zone to provide greater insight on existing (or intended) land use.

Figure 2.4 illustrates the results for Alexandra’s two Industrial zones (east and west). Appendix B contains the maps for all other Industrial Zones.



Economic Assessment of Proposed Clyde Industrial Zone

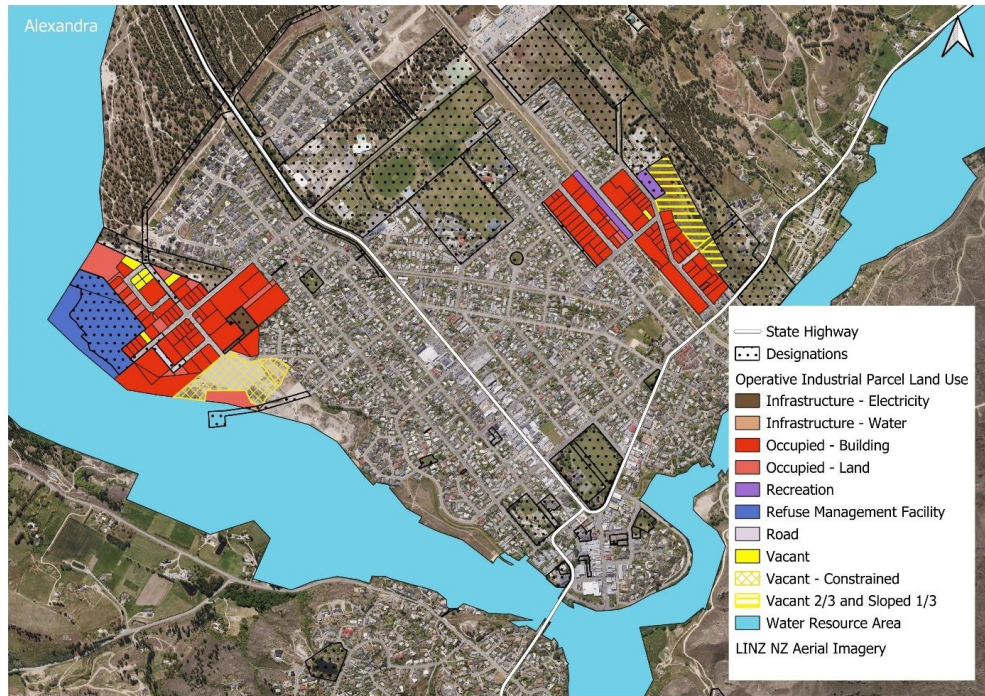


Figure 2.4 – Alexandra Industrial Zone Land Use, Including Vacant Capacity

Table 2.3 provides a high-level summary of the land use that makes up all capacity of each Industrial Zone. Essentially, it identifies land designated for planting, recreation or roading and assumes that this does not represent capacity for industrial activities.¹⁶ Overall, designations not providing for industrial activities makes up between 0%-28% of total Industrial Zone land area – with Naseby’s Industrial Zone most impacted by non-developable land area. In Cromwell and Alexandra however, 97-99% of the zoned area in the Industrial Zones is theoretically available for development.

¹⁶ 93% of the planting designations within Industrial Zones occur in Cromwell. 82% of the designated recreational land within Industrial Zones is in Alexandra East. 60% of the designated roading land within industrial Zones is in Alexandra West.



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Table 2.3 – High Level Summary of Land Use Capacity in Existing Industrial Zones (2024)

	Alexandra East	Alexandra West	Total Alexandra	Cromwell	Ettrick	Millers Flat	Naseby	Omakau	Patearoa	Ranfurlly	Roxburgh	Total Industrial Zone Locations
Land Use Type Area (ha)												
Designation - Planting	-	-	-	4.5	-	-	0.4	-	-	-	-	4.9
Designation - Recreation	0.6	-	0.6	-	-	-	-	-	-	-	0.1	0.7
Designation - Road	-	0.2	0.2	-	-	-	-	-	-	0.2	-	0.4
Industrial Capacity	17.3	34.9	52.1	141.7	4.4	3.3	0.9	5.6	1.0	42.8	33.1	284.9
Total Industrial Zone	17.8	35.1	52.9	146.2	4.4	3.3	1.3	5.6	1.0	42.9	33.2	290.9
Share of Land Use Type Area in Each Location (%)												
Designation - Planting	0%	0%	0%	3%	0%	0%	28%	0%	0%	0%	0%	2%
Designation - Recreation	3%	0%	1%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Designation - Road	0%	1%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Industrial Capacity	97%	99%	99%	97%	100%	100%	72%	100%	100%	100%	100%	98%
Total Industrial Zone	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%
Share of Location in Each Land Use Type (%)												
Designation - Planting	0%	0%	0%	93%	0%	0%	7%	0%	0%	0%	0%	100%
Designation - Recreation	82%	0%	82%	0%	0%	0%	0%	0%	0%	0%	18%	100%
Designation - Road	0%	60%	60%	0%	0%	0%	0%	0%	0%	40%	0%	100%
Industrial Capacity	6%	12%	18%	50%	2%	1%	0%	2%	0%	15%	12%	100%
Total Industrial Zone	6%	12%	18%	50%	2%	1%	0%	2%	0%	15%	11%	100%

Source: LINZ, CODC, Savvy. Land use survey as at April 2024.

Table 2.4 drills down into just the parcel land area within existing Industrial Zones that is not already designated for non-industrial (non-development) activities. This is a total parcel area of 284.9ha across the district, of which 50% (or 141.7ha) is in Cromwell, 12% is in Alexandra West, 6% is in Alexandra East (combined 18% in Alexandra), 15% is in Ranfurlly and 12% is in Roxburgh. This gives a clear indication of the relative size of Industrial Zones across the district, with Cromwell substantially larger, thanks to PC18.

Useable land area in each of the Industrial Zones is divided into three broad categories of land use:

- infrastructure (electricity, sewage, telecoms and water – most are designated but not all),
- occupied parcels (sites with buildings, sites that are industrial yards, and other land uses where businesses are operating), and
- vacant parcels – with further detail provided on whether that vacant capacity is readily available for development, constrained by slope (a significant deterrent to industrial development), constrained by other physical characteristics, or currently covered in bush/forest (which may require a consent for vegetation clearance – also a deterrent for feasible development).



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Table 2.4 – Detailed Results of Parcel Land Use in Industrial Zones (April 2024) Excluding Parcels Designated for Non-Industrial Development

	Alexandra East	Alexandra West	Total Alexandra	Cromwell	Ettrick	Millers Flat	Naseby	Omakau	Patearoa	Ranfurly	Roxburgh	Total Industrial Zone Locations
Land Use Category Area (ha)												
Infrastructure - Electricity	-	0.8	0.8	-	-	-	-	-	-	-	-	0.8
Infrastructure - Sewage	-	-	-	-	-	-	-	-	-	-	6.4	6.4
Infrastructure - Telecoms	-	-	-	-	-	-	-	0.0	-	-	-	0.0
Infrastructure - Water	-	0.1	0.1	-	-	-	-	-	-	-	-	0.1
Sub-Total Infrastructure	-	0.9	0.9	-	-	-	-	0.0	-	-	6.4	7.3
Occupied - Building	11.8	15.6	27.4	60.3	4.3	3.3	-	2.0	0.9	18.2	0.7	117.0
Occupied - Land (i.e. Yard)	0.3	4.1	4.4	30.0	0.1	-	-	0.6	-	4.6	2.2	41.9
Occupied - Lifestyle (Dwelling)	-	-	-	-	-	-	-	-	-	4.5	-	4.5
Occupied - Recreation	0.8	-	0.8	-	-	-	-	-	-	-	-	0.8
Occupied - Refuse Management	-	8.5	8.5	10.4	-	-	-	-	-	-	3.2	22.2
Sub-Total Occupied	13.0	28.2	41.2	100.7	4.4	3.3	-	2.5	0.9	27.3	6.1	186.4
Vacant - Readily Available	2.9	0.9	3.8	41.0	-	-	-	2.9	0.2	15.5	20.5	83.9
Vacant - Bush Cover	-	-	-	-	-	-	-	0.9	-	-	-	0.9
Vacant - Sloped	1.4	-	1.4	-	-	-	-	0.1	-	-	-	1.5
Vacant - Other Constraints	-	4.8	4.8	-	-	-	-	-	-	-	-	4.8
Sub-Total Vacant	4.3	5.8	10.1	41.0	-	-	0.9	3.0	0.2	15.5	20.5	91.2
Total Industrial Capacity	17.3	34.9	52.1	141.7	4.4	3.3	0.9	5.6	1.0	42.8	33.1	284.9
Share of Land Use Category Area in Each Location (%)												
Sub-Total Infrastructure	0%	2%	2%	0%	0%	0%	0%	1%	0%	0%	19%	3%
Sub-Total Occupied	75%	81%	79%	71%	100%	100%	0%	45%	84%	64%	19%	65%
Sub-Total Vacant	25%	17%	19%	29%	0%	0%	100%	54%	16%	36%	62%	32%
Total Industrial Capacity	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%
Share of Location in Each Land Use Category (%)												
Sub-Total Infrastructure	0%	12%	12%	0%	0%	0%	0%	1%	0%	0%	87%	100%
Sub-Total Occupied	7%	15%	22%	54%	2%	2%	0%	1%	0%	15%	3%	100%
Sub-Total Vacant	5%	6%	11%	45%	0%	0%	1%	3%	0%	17%	23%	100%
Total Industrial Capacity	6%	12%	18%	50%	2%	1%	0%	2%	0%	15%	12%	100%

Source: LINZ, CODC, Savvy. Land use survey as at April 2024, minor amendments in September 2024 based on new information.

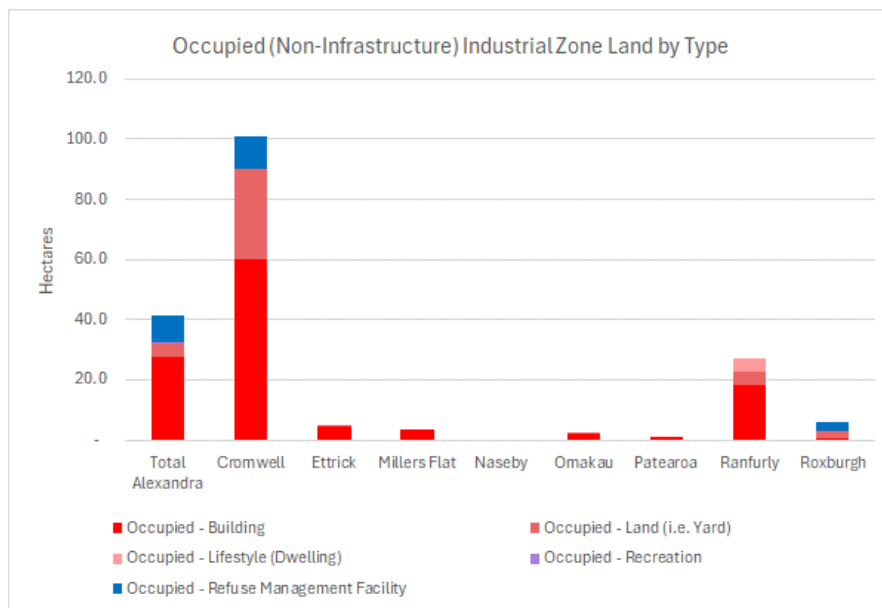


Figure 2.5 – Summary of Occupied Land in Industrial Zones by Urban Area



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Figure 2.5 is a graphical summary of occupied land contained in Table 2.4. It shows that approximately 100ha of Industrial Zone land in Cromwell is occupied. Unlike in other Industrial Zones, the Cromwell Industrial Zone includes substantially more yard-based lots with no permanent buildings. Just over 41ha of land in Alexandra’s Industrial Zones is occupied, with parcels assigned to Refuse Management taking up nearly 21% of occupied land. Recreation activity accounts for a minor share of occupied land in Alexandra East (6% - some designated and the rest being zoned area used by the Otago Rail Trail), but this equates to 2% of total east and west occupied Industrial Zone land.

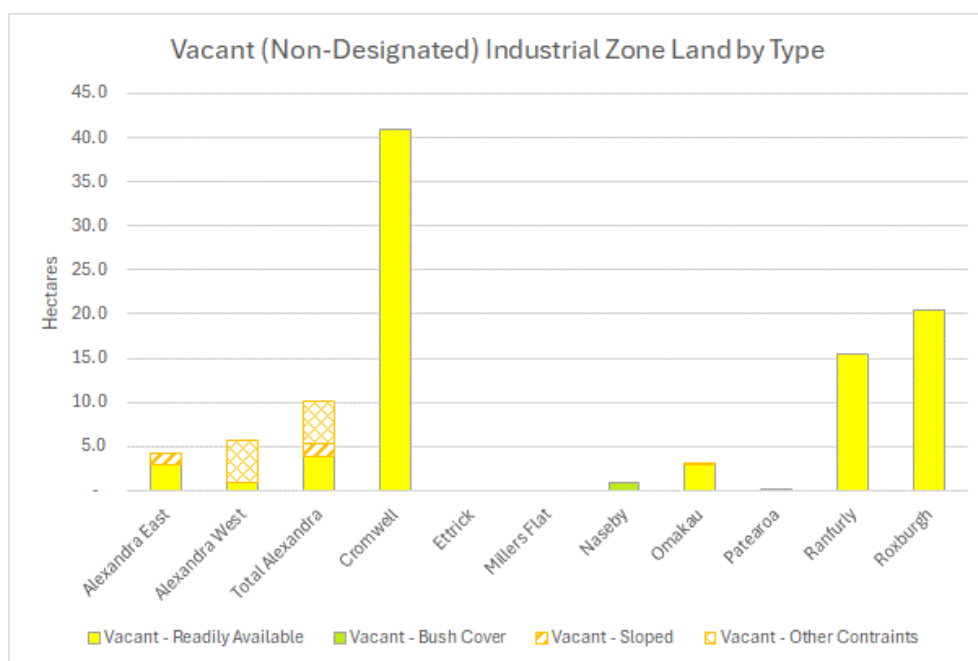


Figure 2.6 – Summary of Vacant Land in Industrial Zones by Urban Area

Figure 2.6 is a graphical summary of vacant land contained in Table 2.4 and is key to this assessment. As a result of PC18, Cromwell has the largest amount of vacant industrial land, with 41ha total. Roxburgh (20.5ha) and Ranfurly (15.5ha) have the second and third largest areas of vacant Industrial Zone land, all of which represents readily available development capacity to the best of my knowledge.

Alexandra has a combined total of 10.1ha of vacant land in the Industrial Zones, although approximately 1.4ha of this is sloped land in Alexandra East. This sloped terrace riser area occupies around a third of the 4.2ha vacant site owned by Canepa Development Limited and

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has a grade of 1:4 (i.e. 25%) which is not considered suitable for industrial use. As such, only 2.6ha of the Canepa land is considered readily available vacant land.

A further 4.8ha in Alexandra West has a range of other physical constraints (Figure 2.4). According to Patersons, this site has geotechnical and land contamination issues on around 70–80% of its area. The site consists of flattened, unconsolidated gold dredge tailings that have been subject to quarrying in the 1980s. The tailings are subject to subsidence and differential settlement. The site is also underlain by historic coal mining tunnels whose spatial extent is unknown. Flood risk is also an issue. The contamination is from dumping of agricultural chemicals in the 1970s from orchards that used to exist on adjoining land. If some of the site is developable, I do not have sufficient information to determine where that suitable land sits relative to the existing occupied industrial areas (i.e. if it is contiguous and/or accessible). As such, I have discounted the full site from vacant capacity given this uncertainty.

If this terrace riser in Alexandra East and multi-constrained land in Alexandra West is excluded, there is only one vacant lot (around 810sqm) and approximately 2.8ha of greenfield land in Alexandra East Industrial Zone and 7 vacant lots in Alexandra West Industrial Zone (totalling around 9,440sqm). This is total unconstrained and readily available vacant land of 3.8ha.

Alexandra has the fourth lowest share of its useable Industrial Zone area vacant (or any category) at just 19%. Patearoa has a lower share as vacant capacity (16%). Ettrick and Millers Flat have no remaining vacant capacity when measured at a parcel level. In terms of unconstrained, readily available vacant land in Industrial Zones, Alexandra also has the fourth lowest share (7% of total industrial capacity, after Ettrick, Millers Flat and Naseby that have 0% each). This is a very low share and quantum of readily available vacant capacity to have in the district's second largest industrial area.

2.5 Vincent Spatial Plans

The Vincent Spatial Plans (for Alexandra-Clyde and Omakau-Ophir) are non-statutory documents that are guiding CODC initiated zoning decisions. The purpose of the Spatial Plans is to provide strategic direction to future urban growth in each of the towns.

The Alexandra-Clyde Spatial Plan identifies a modest new area (6.1ha gross) of future Industrial Zone in Alexandra (on Dunstan Road) (Figure 2.7). It is not contiguous with the



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Alexandra East Industrial Zone as that zone area is already bordered by Residential Zones and the designated town belt recreation area.¹⁸

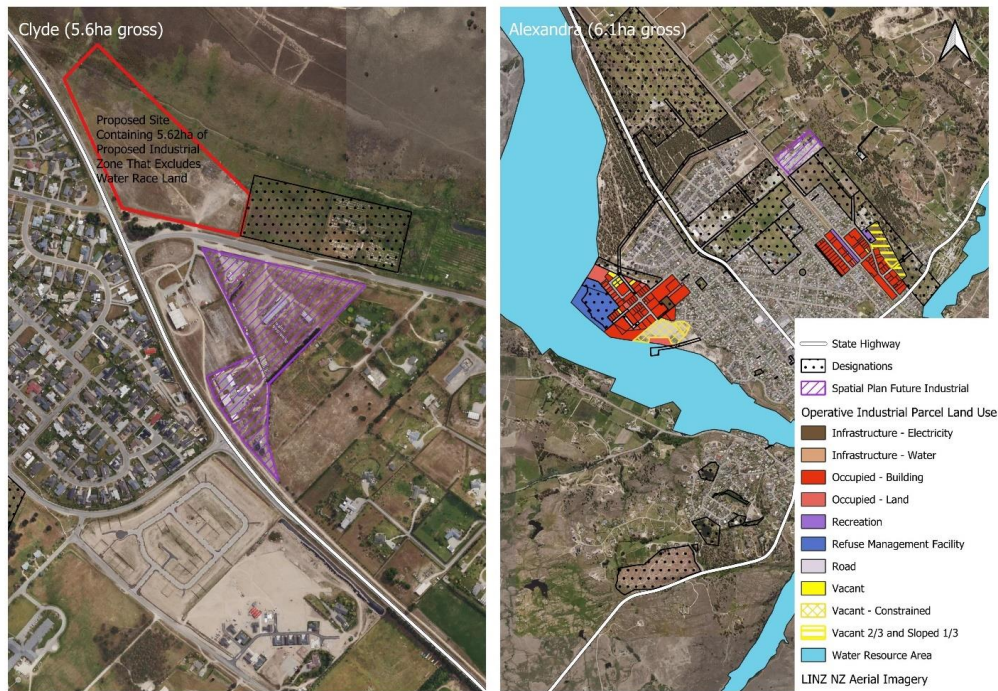


Figure 2.7 – Vincent Spatial Plan – Areas Identified for Future Industrial Zones in Clyde & Alexandra

Based on aerial photos, this appears to be spot zoning in recognition of existing industrial activities. While some of the land parcels within the identified area are not intensively used at present (most have buildings, but a large site is utilised by yard-based activity), I estimate that there is very little potential to accommodate new activities enabled in the Industrial Zone by the District Plan if these activities remain. The exception may be the northern corner of land which looks vacant in the aerial images. Access to this corner site appears to be via adjoining land at present, so that may limit its ability to be purchased/leased by other businesses in future.

Overall, I consider that the Spatial Plan will not provide any material additional development capacity for activities enabled in the Industrial Zone in Alexandra, and readily available

¹⁸ The Industrial Zone in Alexandra West is also effectively hemmed in by existing and proposed residential zoning meaning that contiguous expansion is not likely.

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vacant capacity in the short, medium and long term is therefore limited to the 3.8ha within the existing Industrial Zones.

There is no Industrial Zone presently in Clyde, but the Spatial Plan identifies an area (5.6ha gross) opposite the proposed plan change Site that is intended to be zoned Industrial in the future by CODC (Figure 2.7). Again, the Spatial Plan appears to just recognise existing industrial activities on that land. Use of one of the parcels of land is restricted under Scheduled Activity 105I to a storage shed associated with “*power generation and associated facilities*.” The other parcel contains the Clyde rural fire station. Assuming the Schedule is not lifted, I do not consider that the identified future Industrial Zone in Clyde will provide material development capacity for new activities enabled in the Industrial Zone. This means that the Spatial Plan does not deliver any development capacity for new industrial activities in Clyde in the short, medium or long term.



3 Industrial Zone Demand & Sufficiency

3.1 CODC Growth Projections

CODC's growth projections are produced by Rationale Limited, with the most current projections (as I understand it) being the 2022 projections. These projections include (but are not limited to) population, dwelling and employment projections and are provided at a township/settlement level and total ward level.¹⁹ Projections draw on data by StatisticsNZ and have a 2021 base year. Projected years include 2024, 2034 and 2054, and while 2024 is based on projected data, taking 2024 as the base year allows medium (10 year) and long term (30 year) growth to be calculated consistent with NPS-UD requirements.

Table 3.1 – COD Dwelling Projections by Township/Ward 2024-2054 (Rationale)

Ward	Town/Settlement	Count of Dwellings						Medium Term Growth (2024-34)	Long Term Growth (2024-54)	
		2018	2019	2020	2021	2024 (p)	2034 (p)			2054 (p)
Cromwell	Cromwell	2,736	221	3,002	3,104	3,404	4,202	5,744	798	2,340
Cromwell	Rest of Cromwell Ward	1,338	4,006	1,517	1,560	1,784	2,541	4,012	757	2,228
Cromwell	Sub-Total Cromwell Ward	5,121	5,247	5,384	5,452	5,787	6,828	8,728	1,041	2,941
Vincent	Alexandra	2,631	2,675	2,697	2,715	2,838	3,224	3,983	386	1,145
Vincent	Clyde	786	799	801	802	838	919	971	81	133
Vincent	Omakau & Ophir	222	235	249	249	273	355	513	82	240
Vincent	Rest of Vincent	1,482	1,538	1,637	1,686	1,838	2,330	3,261	492	1,423
Vincent	Sub-Total Vincent Ward	5,121	5,247	5,384	5,452	5,787	6,828	8,728	1,041	2,941
Maniototo	Ranfurlly	459	461	458	460	474	510	534	36	60
Maniototo	Naseby	297	298	302	311	318	336	348	18	30
Maniototo	Patearoa	111	111	114	118	121	129	135	8	14
Maniototo	Rest of Maniototo	336	339	345	344	349	361	368	12	19
Maniototo	Sub-Total Maniototo Ward	1,203	1,209	1,219	1,233	1,262	1,336	1,385	74	123
Teviot Valley	Roxburgh	369	369	368	370	380	411	471	31	91
Teviot Valley	Lake Roxburgh Village	45	45	45	45	47	52	62	5	15
Teviot Valley	Etrick	102	102	102	102	104	110	121	6	17
Teviot Valley	Millers Flat	57	58	58	63	64	68	75	4	11
Teviot Valley	Rest of Teviot	411	418	471	431	451	517	642	66	191
Teviot Valley	Sub-Total Teviot Ward	984	992	1,044	1,011	1,046	1,158	1,371	112	325
Total District		11,382	11,675	12,166	12,360	13,283	16,065	21,240	2,782	7,957

Source: Rationale, 2022.

I have carried out some checks at a township and ward level to see how the Rationale population and dwelling projections are tracking relative to data since released for 2022 and 2023. When inserting June Year End Population Estimates, the Rationale population projection for 2024 looks consistent and appropriate. When inserting June Year End Residential Dwelling Consents (and allowing for a one-year lag following consents for dwellings to be completed),

¹⁹ Using mainly SA2s and 2023 ward boundaries.

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the Rationale dwelling projections for 2024 look consistent and appropriate (within +/- 2% of forecast 2024 dwellings). As such, the Rationale projections for dwellings are adopted for this assessment, as published.

Table 3.1 shows that across the district, dwellings are projected to increase by just over 2,780 in the medium term (from just over 13,383 estimated for 2024 to 16,065 by 2034). This is total growth of 21% or an average increase of 278 dwellings over the next 10 years. Growth over the long term is estimated at nearly 7,960 additional dwellings (to reach 21,240 dwellings by 2054).

Cromwell Ward, is anticipated to account for 56% of medium-term dwelling growth in the district, followed by Vincent Ward at a 37% share. These shares are expected to remain relatively stable over the long term (to 2054).

Within the Vincent Ward, the majority of dwellings are in Alexandra (49% share in 2024), followed by the Rest of Vincent Ward area (32% share) which reflects mainly the concentration of dwellings in the Rural Residential Zones east and west of Alexandra and Clyde (Table 3.1 and Figure 3.1). Clyde currently accounts for 14% of Vincent ward dwellings (estimated at 838), and Omakau–Ophir combined account for just 5%.

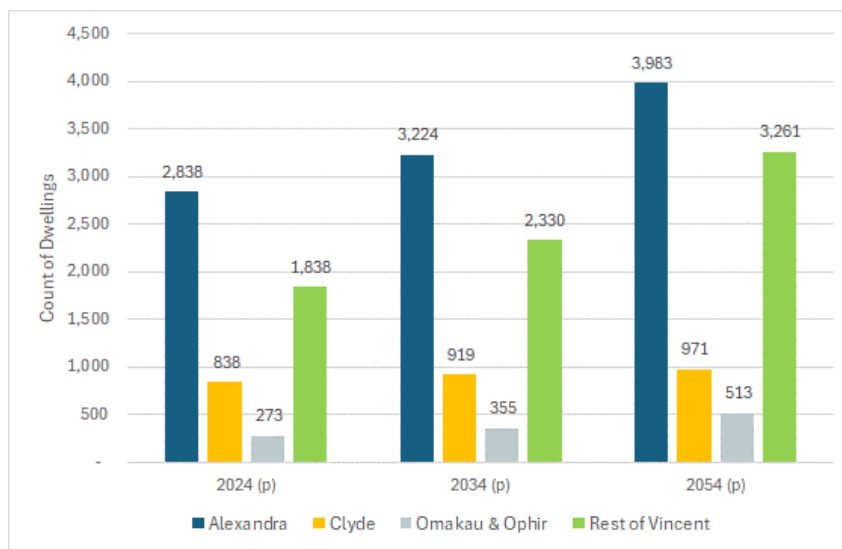


Figure 3.1 – Dwelling Projections by Township, Vincent Ward 2024-2054 (Rationale)

In terms of projected growth within Vincent Ward, Alexandra is anticipated to grow by an average of 39 dwellings per annum over the medium term (to 2034), with a similar average rate (38 per annum) over the long term. Rural Residential growth (in the Rest of Vincent Ward) is expected to be even higher, with an average increase of 49 dwellings/annum over the

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medium term and 47/annum over the long term. By contrast, Clyde is projected to grow by an average of 8 dwellings/annum in the medium term, decreasing to 4 dwellings/annum in the long term, and Omakau-Ophir to have consistent growth over the long-term of 8 dwellings per annum.

This means that despite Alexandra accounting for 49% of ward dwellings currently, it is projected to have just 37% of the growth in dwellings over the medium term. Similarly, while Clyde has 14% of current dwellings in Vincent Ward, it is projected to account for just 8% of the dwelling growth to 2034. This is all driven by relatively stronger growth anticipated outside of the urban areas, in the Rural Residential Zones.

3.1.1 Constrained Demand in Clyde

While I understand that the dwelling projections discussed above are not constrained by development capacity for housing (which is preferable for growth projections, especially in the context of NPS-UD assessment), the recommended (medium) growth projections for Clyde are still constrained. The projections show a slow-down of growth in the short term and a plateauing of population and dwelling growth in the long-term. Rationale states that this slow down “is driven by a projected plateauing of employment opportunities”.²⁰ Indeed, employment projections included in the Rationale report for Clyde show an annual average increase over the long term of just 1 additional person employed per annum.

At face value, the employment projections seem conservative for Clyde given strong recent growth in bike tourism, and tourism generally in the town (post Covid-19) and demands on the Dunstan Hospital (which serves a far-reaching catchment, and which has the prospect for some expansion of services/facilities). While the Clyde Business Zone is fixed in size, there is likely to be potential for some additional businesses, and/or existing businesses to sustain additional staff over time. The same applies to the Dunstan Hospital.

It is also surprising, given that Rationale identify Alexandra and Cromwell as places where Clyde workers commute, that local employment opportunities in Clyde itself is treated as a constraint on population growth as presumably commuting will still be a valid option for future residents.

While discussed later on, the provision of a local industrial zone in Clyde would provide for growth in local job opportunities, and may stimulate a transfer in housing demand from elsewhere in the district to Clyde.²¹ By Rationale’s current logic, the proposed plan change

²⁰ Rationale, 2022, page 30.

²¹ I do not anticipate that it would sustain net additional dwelling growth at the district level (relative to projected growth).



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could (at the very least) help remove the constraints applied to Clyde’s growth, and population (and subsequently dwelling) growth assumptions could be elevated (relative to current projections) as a result. A minor to moderate increase in reported medium and long term dwelling growth in Clyde township would be reasonably anticipated under a scenario where the proposed private plan change is approved.

3.1.2 PC19 Implications

Despite only modest (and potentially conservative) growth in dwellings projected for Clyde by Rationale, CODC has identified significant additional residential development capacity in and around Clyde in the Alexandra-Clyde Spatial Plan, which is being implemented by PC19.

Figure 3.2 illustrates the changes proposed (notified) in PC19 for Clyde beyond the existing Residential Zone area. While not shown, PC19 also provides for a Medium Density Residential Zone in and around the town centre (extending to Whitby Road) which will encourage intensification (infill and redevelopment) over time.

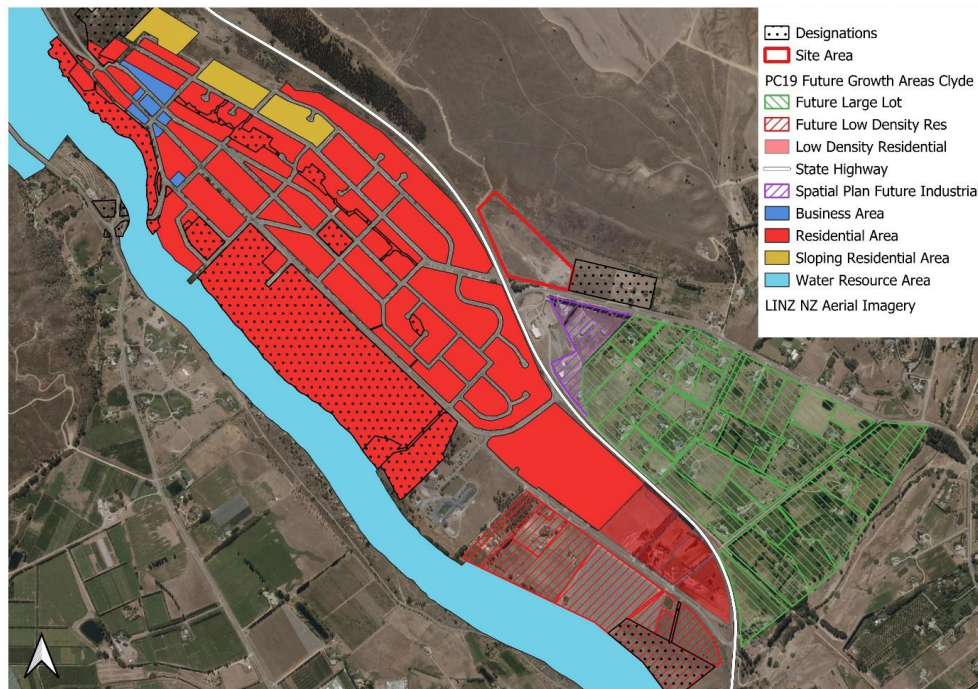


Figure 3.2 – PC19 Proposed Residential Zoning (Outside Existing Residential Zone)

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PC19 live zones 12ha of additional Low Density Residential Zone on the northern side of Muttontown Road²², and creates a large (29ha) area of Future Low Density Residential Zone on the southern side of Muttontown Road.²³ Combined with any existing vacant development capacity in the Residential zone, plus the potential for intensification around the town centre, these areas provide housing capacity that is likely to be sufficient for demand growth well beyond the next 30 years based on Rationale's current growth projections for Clyde township (or even moderately higher growth projections).

In addition, PC19 creates an 80ha Future Large Lot Residential Zone which intensifies the existing Rural Residential Zone currently containing an estimated 37 dwellings. While part of Clyde, this area falls outside the Clyde township SA2 boundary, and therefore provides long term housing capacity for the 'Rest of Vincent Ward' (discussed earlier and projected to have a demand growth rate greater than within any one urban area of Vincent Ward).

In summary, while dwelling growth is not currently constrained in Clyde township (with some vacant capacity available in the Residential Zone at present), and is expected to increase at a moderate (albeit potentially conservative) rate according to Rationale, the zoning that would be put in place by PC19 is considered likely to ensure that supply of housing in and around Clyde is not constrained over the long term future (i.e. the next 30 years).²⁴

3.2 Projected Demand for Industrial Zoning

This sub-section provides estimates of future demand for Industrial Zoning in COD. A high-level modelling approach has been adopted for the purpose of this report. While considered sufficient in the context of the overall assessment objectives, I acknowledge that the approach is not as robust as modelling that would, for example, be expected for a Housing and Business Development Capacity Assessment (HBA) under the NPS-UD.²⁵ The adopted approach relies on a number of assumptions, and like all models, it comes with a number of limitations.

²² This land is currently occupied by 4 dwellings (estimate) which may or may not be retained if the land is developed.

²³ This land is currently occupied by 4 dwellings (estimate) which may or may not be retained if the land is live zoned and developed in the future.

²⁴ This assumes the Future growth zones, are live zoned as required during that period.

²⁵ Such an approach was outside the budget and timeframes available for this assessment.



3.2.1 Approach and Assumptions

In summary, the approach takes existing 2024 dwellings by location (as estimated by Rationale), and current estimates of occupied Industrial Zone land by location (based on the desktop land use survey discussed earlier) to generate 2024 ratios of occupied Industrial Zone land per dwelling. These ratios are then multiplied by projected dwellings in 2034 to give a projected estimate of occupied Industrial Zone land in that year in each location. The modelling is limited to the medium term as any limitations of the approach would be amplified in the long term (i.e. there would be greater uncertainty).

The key assumptions (and therefore limitations) of this high-level approach include:

- It assumes a state of equilibrium exists in 2024 (i.e., there is no redundant occupied land in Industrial Zones and no latent demand). As most existing Industrial Zones have at least some vacant capacity, this helps supports the assumption of no latent demand. As the land use survey could not detect any vacant buildings, the assumption about any redundancy cannot be verified.
- It assumes that the 2024 ratio of occupied Industrial Zone land holds constant over the medium term (with no productivity gains). Over the medium term, the risk of overstating demand through this assumption is minimised because a portion of vacant land in existing Industrial Zones is already subdivided into lots. So, even if future businesses require less land than businesses today, a portion of them will be limited to take-up of the existing supply of vacant industrial lots.
- It also assumes that all growth in demand needs to be met through occupation of additional land (either existing businesses expanding or new businesses establishing). In reality, some growth in demand over the medium term is likely to be met by existing businesses and within the existing land footprint of those businesses. That said, this assumption is consistent with the NPS-UD guidance for business demand modelling in HBAs.
- It is neutral on whether there is leakage of Industrial Zone demand in or out of the district. The 2024 occupied Industrial Zone area is a reflection of the net demand supplied in COD and assumes leakage trends remain constant over the medium term.
- It assumes dwelling growth in COD (and each part of COD) is the sole indicator of Industrial Zone demand in the district. That is, it does not take into account wider economic drivers of demand that may increase or decrease demand independent of the trends in dwelling growth. An example of this might include changes in export

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values for horticultural products produced in the district which might drive more or less processing, warehousing and transport land use in Industrial Zones in the future.

The approach requires an allocation of Industrial Zone demand 'on the ground'. In recognition that a portion of Industrial Zone demand can be met locally (where there is a local Industrial Zone) and simultaneously a portion of demand is met in one of the two larger industrial areas of Cromwell and Alexandra (whichever is closest), two allocation scenarios have been used.

Scenario 1 generates occupied Industrial Zone land/dwelling ratios at the ward level, and then allocates that demand to existing Industrial Zones using the percentage distribution of occupied Industrial Zone land (2024) within each ward.

Scenario 2 applies the same approach as Scenario 1 for the Cromwell ward, but for the rest of the district,²⁶ it generates a single occupied Industrial Zone land/dwelling ratio for that catchment. It then allocates that demand to existing Industrial Zones using the percentage distribution of occupied Industrial Zone land (2024) within that wider catchment.

Both scenarios are similar and recognise the primary role of Cromwell and Alexandra in servicing industrial activity demand across their broad catchments despite the presence of some local Industrial Zones. However, using localised or catchment wide demand ratios produces slightly different final demand figures. Combined, the two scenarios are used to create a range of medium-term demand results for each location.

3.2.2 Medium Term Demand Results

Table 3.2 shows that across the district, the occupied area of existing Industrial Zones is estimated to increase by 29.1ha – 31.1ha by 2034, assuming no constraints on Industrial Zone capacity. While Cromwell currently has a 54% share of total occupied Industrial Zone land in the district, it is estimated to account for 55-58% of medium term growth in occupied Industrial Zone land, depending on the scenario applied.²⁷ This equates to growth of 18.1ha over the next 10 years.

Demand in the Vincent Ward is estimated to equate to 6.6ha – 7.9ha of additional occupied Industrial Zone land over the medium term. Based on current zoning options, the significant majority is estimated to be met in Alexandra (6.2ha – 7.4ha), with only a small share (0.4ha – 0.5ha) supplied in Omakau.

²⁶ I.e. the sum of Vincent, Maniototo and Teviot Valley Wards.

²⁷ This result is generally consistent with Rationale's employment projections.

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Demand in the Maniototo Ward and Teviot Valley Ward is estimated at 1.6ha – 4.3ha and 1.5ha – 2.1ha respectively of additional occupied land in Industrial Zones by 2034.

Table 3.2 – Estimated Medium Term Industrial Zone Demand by Scenario (2024)

Ward	Town/Settlement	Estimated 2024 Dwellings *	Medium Term Dwelling Growth (2024-34) *	Total Occupied Industrial Zone Area 2024 (ha)	Projected Total Occupied Industrial Zone 2034		Projected Net Increase in Occupied Industrial Zone 2034	
					Scenario 1 (ha)	Scenario 2 (ha)	Scenario 1 (ha)	Scenario 2 (ha)
Cromwell	Cromwell	3,404	798	100.7	118.8	118.8	18.1	18.1
Cromwell	Rest of Cromwell Ward	1,784	757	-	-	-	-	-
Cromwell	Sub-Total Cromwell Ward	5,787	1,041	100.7	118.8	118.8	18.1	18.1
Vincent	Alexandra	2,838	386	41.2	48.6	47.4	7.4	6.2
Vincent	Clyde	838	81	-	-	-	-	-
Vincent	Omakau & Ophir	273	82	2.5	3.0	2.9	0.5	0.4
Vincent	Rest of Vincent	1,838	492	-	-	-	-	-
Vincent	Sub-Total Vincent Ward	5,787	1,041	43.7	51.6	50.4	7.9	6.6
Maniototo	Ranfurlly	474	36	27.3	28.9	31.4	1.6	4.1
Maniototo	Naseby	318	18	-	-	-	-	-
Maniototo	Patearoa	121	8	0.9	0.9	1.0	0.1	0.1
Maniototo	Rest of Maniototo	349	12	-	-	-	-	-
Maniototo	Sub-Total Maniototo Ward	1,262	74	28.1	29.8	32.4	1.6	4.3
Teviot Valley	Roxburgh	380	31	6.1	6.8	7.1	0.7	0.9
Teviot Valley	Lake Roxburgh Village	47	5	-	-	-	-	-
Teviot Valley	Ettrick	104	6	4.4	4.9	5.1	0.5	0.7
Teviot Valley	Millers Flat	64	4	3.3	3.7	3.8	0.4	0.5
Teviot Valley	Rest of Teviot	451	66	-	-	-	-	-
Teviot Valley	Sub-Total Teviot Ward	1,046	112	13.9	15.4	16.0	1.5	2.1
Total District		13,283	2,782	186.4	215.5	217.5	29.1	31.1

Source: * Rationale, 2022. Savvy.

3.3 Sufficiency of Existing Industrial Zones

Policy 2 (and related clauses 3.2 and 3.3) of the NPS-UD requires that Tier 3 TAs provide at least sufficient development capacity to meet expected demand for housing and for business land over the short, medium, and long term. Tier 3 territorial authorities are not required to apply the competitiveness margin on top of demand. As such, this sub-section compares the medium term demand growth for Industrial Zones described above with the current estimates of vacant plan enabled capacity in existing Industrial Zones discussed in Section 2.4. As constrained land is not considered suitable (feasible) for industrial development, the analysis does not include highly sloped²⁸ or other physically constrained vacant land²⁹ in the sufficiency calculations.

²⁸ Such as the terrace rise land in Alexandra East and the small site in Omakau that drops steeply below the road.

²⁹ I.e. the land in Alexandra West that has multiple constraints including subsidence, flood risk and contamination.

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The results are summarised (by scenario of demand) in Table 3.3. Indicative shortfalls of capacity by 2034 are shown in red. In all wards except Vincent Ward, current zoned readily available vacant capacity is sufficient to meet projected demand over the medium-term, even without utilising vacant Industrial Zoned land currently covered in bush.

Table 3.3 – Industrial Zone Capacity Sufficiency Estimates by Scenario – Medium Term

Ward	Town/Settlement	Projected Net Increase in Occupied Industrial Zone 2034		Vacant Capacity - Readily Available Only*	Vacant Readily Available Capacity - Sufficiency Medium Term		Vacant Capacity - Readily Available + Vacant Bush Land	Vacant Readily Available + Bush Capacity - Sufficiency Medium Term	
		Scenario 1 (ha)	Scenario 2 (ha)		Scenario 1 (ha)	Scenario 2 (ha)		Scenario 1 (ha)	Scenario 2 (ha)
Cromwell	Cromwell	18.1	18.1	41.0	22.9	22.9	41.0	22.9	22.9
Cromwell	Rest of Cromwell Ward	-	-	-	-	-	-	-	-
Cromwell	Sub-Total Cromwell Ward	18.1	18.1	41.0	22.9	22.9	41.0	22.9	22.9
Vincent	Alexandra	7.4	6.2	3.8	- 3.6	- 2.4	3.8	- 3.6	- 2.4
Vincent	Clyde	-	-	-	-	-	-	-	-
Vincent	Omakau & Ophir	0.5	0.4	2.9	2.4	2.5	2.9	2.4	2.5
Vincent	Rest of Vincent	-	-	-	-	-	-	-	-
Vincent	Sub-Total Vincent Ward	7.9	6.6	6.7	- 1.1	0.1	6.7	- 1.1	0.1
Maniototo	Ranfurlly	1.6	4.1	15.5	13.9	11.4	15.5	13.9	11.4
Maniototo	Naseby	-	-	-	-	-	0.9	0.9	0.9
Maniototo	Patearoa	0.05	0.13	0.17	0.12	0.04	0.17	0.12	0.04
Maniototo	Rest of Maniototo	-	-	-	-	-	-	-	-
Maniototo	Sub-Total Maniototo Ward	1.6	4.3	15.7	14.0	11.4	16.6	14.9	12.3
Teviot Valley	Roxburgh	0.7	0.9	20.5	19.9	19.6	20.5	19.9	19.6
Teviot Valley	Lake Roxburgh Village	-	-	-	-	-	-	-	-
Teviot Valley	Ettrick	0.5	0.7	-	- 0.5	- 0.7	-	- 0.5	- 0.7
Teviot Valley	Millers Flat	0.4	0.5	-	- 0.4	- 0.5	-	- 0.4	- 0.5
Teviot Valley	Rest of Teviot	-	-	-	-	-	-	-	-
Teviot Valley	Sub-Total Teviot Ward	1.5	2.1	20.5	19.0	18.4	20.5	19.0	18.4
Total District		29.1	31.1	83.9	54.8	52.8	84.9	55.7	53.8

* Excludes Vacant Sloped land, Vacant - Other Constraints Land, Vacant Bush Land.

In the Cromwell Ward, Cromwell's Industrial Zone is estimated to have a medium term surplus of 22.9ha in 2034, so is well placed to accommodate demand growth into the long term.³⁰

In the Maniototo Ward, there is sufficient capacity in all existing Industrial Zones to meet projected demand over the medium term. In Patearoa, it is estimated that the Industrial Zone could be nearly fully occupied by 2034. One response may be to increase plan enabled capacity in Patearoa. Alternatively, any shortfalls beyond the medium term (not modelled) could be supplied instead in Ranfurlly where there is estimated to be surplus capacity. This is considered to be an appropriate outcome for this ward in the long term given that Ranfurlly is the main centre in the ward.

³⁰ PPC21 further increases the surplus/sufficiency of industrial capacity in the Cromwell Ward in the medium-term.

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In the Teviot Valley Ward, there is an implied minor shortfall of capacity in the Ettrick and Millers Flat Industrial Zones by 2034. One response may be to increase plan enabled capacity in each settlement. Alternatively, there is an estimated large surplus of capacity in Roxburgh, and like in the Maniototo Ward, it would be an appropriate outcome for any unmet demand to be met in Roxburgh, given it is the main centre for the ward.

In the Vincent Ward, there is a net shortfall by 2034 of 1.1ha under the Scenario 1 demand allocation and a very minor surplus of 0.09ha under the Scenario 2 demand allocation. At the ward level, this result is a combination of an implied shortfall of capacity in the Alexandra Industrial Zones by 2034 of between 2.4ha – 3.6ha and an implied surplus of capacity in Omakau of between 2.4ha – 2.5ha. This result suggests that Alexandra only has sufficient suitable vacant capacity to cater for 5–6 years of demand growth before being fully occupied. While there is a surplus of Industrial Zone capacity in Omakau that could in theory accommodate a portion of this unmet demand, the distance of Omakau from Alexandra (as well as from Clyde and the popular rural residential areas close to Clyde and Alexandra who would be reliant on much of that industrial activity) is such that it would not be an efficient way to address even a portion of the Alexandra shortfall.

The most efficient way to address the projected shortfall in Alexandra is to provide additional plan enabled industrial capacity in Alexandra, or nearby. As both existing Industrial Zones in Alexandra cannot be expanded based on existing or intended zoning for other land uses, any additional Industrial Zone capacity in Alexandra would need to be in a discrete location.

As discussed, the Alexandra–Clyde Spatial Plan identified two new Industrial Zones – one in each town, but as the intent is to recognise existing industrial activities on those sites, live zoning these two areas within the next 10 years is unlikely to materially assist with addressing the projected shortfall in Alexandra.

3.4 Proposed Clyde Industrial Zone

Clyde is in a unique situation of being the third largest discrete township in the district and yet not having its own local Industrial Zone. Much smaller towns and settlements than Clyde, which have not been identified as strategic growth areas, have local Industrial Zones which provide a range of benefits to those local communities. This urban form still allows a large share of local industrial demand to flow to higher order centres (and the ensuing economic benefits that come from having those larger geographic concentrations of business activity).

This has likely been the result of Clyde historically being a popular holiday home destination with a small resident population that is relatively close to Alexandra. However, the permanent

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resident population of Clyde has grown steadily, and it has (or will have) significant capacity to accommodate further population/dwelling growth over the long term.

While it is still close to Alexandra, the larger its population gets, the less efficient it will be for all of the town's (and surrounding rural catchment's) demand for Industrial Zone activity to be supplied wholly elsewhere (i.e. in Alexandra). Increasing the self-sufficiency of Clyde in terms of local employment opportunities as well as local access to industrial activities (goods and services) will increase the functional and social amenity of the town and reduce car-based travel (and associated greenhouse gas emissions) over the long-term.

Based on the demand modelling approach outlined earlier,³¹ applying the ratios of occupied Industrial Zone/dwelling for 2024 to just the dwellings within the Clyde township (and not the rural residential dwellings that may be closest to Clyde), indicatively Clyde already sustains total demand for Industrial Zone land of between 6.3ha – 8.9ha based purely on its share of current dwellings (and according to Scenario 1 and 2 approaches). At present all of this demand is assumed to be met in Alexandra. By 2034, and based on potentially conservative growth projections, the Clyde community could sustain total demand for 6.9ha – 9.7ha of Industrial Zone land.

Only a portion of this total demand is likely to be sustainable locally in the medium-term, with much of it still being most efficiently supplied in Alexandra. At 5.62ha (gross), the proposed Industrial Zone for Clyde would, in my view, be sufficient to cater for long term local demand for industrial activities in Clyde. While some activity that may be attracted to the proposed Industrial Zone may represent a redistribution of existing demand away from Alexandra, this distributional effect would be likely to occur gradually.

The remaining portion of activity that may be attracted to the proposed Industrial Zone is likely to be sustained by new local dwelling growth in Clyde. This represents an opportunity cost for growth that may have otherwise occurred in Alexandra but is a minor opportunity cost over time. Slowing the expected rate of demand for Alexandra Industrial Zones over the medium term, will extend the time over which the existing Industrial Zones are 'sufficient', albeit it is only expected to be sufficient for another 5–6 years before there is no capacity remaining. Even with a Clyde Industrial Zone, I conclude that Alexandra cannot meet the test of medium term sufficiency, and more suitable greenfield land needs to be zoned in accordance with the RPS and NPS-UD.³²

³¹ And notwithstanding the limitations of the modelling.

³² Given the lead in times between zoning and lots being available to the market, providing more zoned capacity in Alexandra should not be delayed.



4 Loss of Highly Productive Land

As set out in the Land Productivity Report (Patersons, 2024), the proposed site includes some LUC 3 land and therefore qualifies as highly productive land (HPL) under the interim provisions of the NPS-HPL.³³ The key clause of the NPS-HPL that is relevant for plan changes seeking urban expansion on HPL in Tier 3 TAs is clause 3.6(4).³⁴ It states that TAs may allow urban rezoning of HPL only if three tests are met. This sub-section considers those three tests.

4.1.1 A) the rezoning is required to provide sufficient development capacity in the district

The relevant time frame for understanding sufficiency in this context is the medium term, as only a medium term shortfall of capacity requires a live zoning response. This contrasts with long term shortfalls which can be responded to with either additional live zoning or the identification of suitable areas for future development in a growth strategy, spatial plan or similar document.

Section 3.3 above has carried out a high-level sufficiency assessment of demand and capacity for industrial zoning in COD in the medium term, broadly consistent with NPS-UD guidance. The key finding was that Clyde is an urban area that generates demand for industrial activity. By 2034, this demand is estimated to sustain an indicative 6.9ha – 9.7ha of occupied Industrial Zone land. There is no Industrial Zone provided in Clyde and the future Industrial Zone areas identified in the Clyde Spatial Plan are not expected to provide development capacity for new business activity. In simple terms, this indicates that insufficient Industrial Zone capacity has been provided in the District Plan for the Clyde urban area and this requires a zoning response.

Alternatively, if the legacy approach of treating Clyde as a satellite residential area of Alexandra is maintained,³⁵ whereby Clyde is, and will forever be, 100% dependent on Alexandra for the supply of industrial activity, then the analysis also shows that Alexandra is estimated to face a shortfall of Industrial Zone capacity in the medium term. The future Industrial Zone area identified in the Alexandra Spatial Plan is not expected to provide development capacity for new business activity that will materially assist with this projected shortfall.

³³ Until HPL is mapped by the Otago Regional Council, HPL is defined as LUC 1, 2 and 3.

³⁴ The tests are similar under Clause 3.10.

³⁵ Which I do not support as an efficient urban form going forward.

Economic Assessment of Proposed Clyde Industrial Zone



As the primary industrial area of the Vincent, Maniototo and Teviot Valley Wards, it is not efficient for the projected shortfall of capacity in Alexandra to be met by surplus capacity in smaller, distant townships like Ranfurly, Roxburgh or even Omakau. Further, it is considered that surplus capacity in Cromwell is needed for future demand arising within the Cromwell Ward and is not an appropriate substitute for providing additional zoned capacity in or near Alexandra. The distance to Cromwell also renders this a less efficient solution.

As such, the projected insufficiency of Industrial Zone capacity in Alexandra in the medium term is not able to be offset by capacity already provided elsewhere in the District Plan and therefore requires a zoning response.

Overall, I consider that the test of medium term insufficiency is met – either for Clyde as a location of demand, or for Alexandra (which Clyde is currently dependent on).

4.1.2 B) There are no other reasonably practicable and feasible options to provide the required development capacity

The land in the vicinity of Alexandra and Clyde contains pockets of LUC 3 land. Appendix C contains maps that show the LUC 3 land, operative District Plan zoning, Spatial Plan future industrial areas, and in the case of Clyde, the PC19 greenfield growth areas.

Alexandra does not contain any HPL in Rural Zone areas adjoining the urban zones, and generally there is none adjoining the Rural Residential Zone. While relatively unconstrained by HPL, this does not mean that there are any obviously practicable and feasible options to provide additional Industrial Zone land.

The only potential option that could be feasible (from an industrial development perspective) would be to utilise some of the Large Lot Residential Zone on Dunstan Road identified in the Spatial Plan. This would displace existing dwellings on that land as well as reduce the opportunity to provide for large lot living in a suitable location close to the town. Both considerations may make this option impracticable.

Clyde is relatively more constrained by HPL (Appendix C). HPL covers the flat land right along Springvale Road until just beyond the greenbelt proposed in the Spatial Plan. Similarly, it covers the land on the eastern side of State Highway 8 until just beyond the greenbelt. Assuming any land west of the Clutha River is not an appropriate location for urban expansion, the proposed Industrial Zone site is potentially the only site adjoining the existing urban area that is not already occupied by high value residential properties, notified for higher value urban zoning (i.e. residential) or identified for future residential zoning or large lot infill, that would also provide for a consolidated urban form in Clyde.



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The next available option would be a standalone Industrial Zone south of Clyde in the less dense Rural Residential Zone. This is likely to be impracticable and result in a less efficient urban form.

As low value rural land immediately adjacent to the existing urban area of Clyde, and opposite the proposed future Industrial Zone, I consider that the proposed site is the most reasonably practicable and feasible option to provide additional Industrial Zone capacity in either Clyde or Alexandra at this current time. As such, I consider this test to be met.

4.1.3 C) The ... economic benefits of rezoning outweigh the ... economic costs of foregone land-based primary production

Clause 3.6(4)(c) requires environmental, social, cultural and economic costs and benefits to be assessed. I focus here only on the economic costs and benefits. The core tangible economic benefits arising from the proposed Industrial Zone are the GDP and employment effects of:

- completing the one-off land development of the site (short term benefit),
- completing the one-off construction of buildings and/or other improvements³⁶ on the indicative 21 lots,³⁷ (spread over the short, medium and long-term) and
- the ongoing operation of new businesses that establish in the zone (long term benefit).

While the land development may be expected to be completed in a single stage, the take up of the future lots by new businesses is expected to be gradual and potentially spread over the short, medium and long term. As such, the economic benefits will accrue slowly after an initial short-term impact.

The following assumptions have been used to quantify the indicative economic impacts of the construction stages of the proposed zone only (i.e., the first two bullet points above).

- 21 lots delivered and all lots contain a building. Very indicatively, I have adopted an average building size of 400sqm and a commercial construction cost of \$2,000/sqm.
- Design, planning and consents take place over 6 months, the land development takes place over 12 months and the construction of buildings occurs over 10 years.³⁸ Total development period of 11.5 years.

³⁶ Not all future lots in the proposed zone will necessarily contain buildings as they may be used for industrial yards. That said, most yards tend to include some small ancillary building. Other improvements would still include fencing, security, signage, sealed/concreted areas etc.

³⁷ Based on indicative subdivision plan provided.

³⁸ This may be longer, but the economic impacts will be the same.



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- I have applied land development costs obtained from other development projects I have been involved in, and assumed that the planning, design and consenting indicatively equates to 1% of land development costs.

Future explanation, assumptions and caveats of my approach are set out in Appendix D. In summary, using multiplier analysis, Table 4.1 shows the indicative direct, indirect, induced and total economic impacts of the construction of the proposed Industrial Zone. I estimate that the proposal could:

1. Contribute \$₂₀₂₀16 million in value added to the COD economy over 11.5 years.
2. Generate wages/salaries for COD households to the value of \$₂₀₂₀7 million over 11.5 years.
3. Sustain employment for around 118 FTE-years across a broad range of sectors in COD (or equivalent to around 10 full-time workers (on average) for 11.5 years).

Table 4.1 – Direct, Indirect, Induced and Total Economic Impacts of the Development of the Proposed Industrial Zone on the Central Otago Economy (\$2020)

	Direct Impact	Indirect Impact	Induced Impact	Total Impact
Design/Planning/Consents				
FTEs (annual average)	0.2	0.1	0.1	0.4
Value Added (\$ ₂₀₂₀ m)	\$ 0.01	\$ 0.01	\$ 0.01	\$ 0.03
Gross Household Income (\$ ₂₀₂₀ m)	\$ 0.01	\$ 0.00	\$ 0.00	\$ 0.01
Land Development				
FTEs (annual average)	5	8	4	17
Value Added (\$ ₂₀₂₀ m)	\$ 0.7	\$ 1.0	\$ 0.6	\$ 2.3
Gross Household Income (\$ ₂₀₂₀ m)	\$ 0.5	\$ 0.5	\$ 0.2	\$ 1.2
Commercial Construction				
FTEs (annual average)	2	6	2	10
Value Added (\$ ₂₀₂₀ m)	\$ 2.8	\$ 7.4	\$ 3.0	\$ 13.3
Gross Household Income (\$ ₂₀₂₀ m)	\$ 1.2	\$ 3.7	\$ 1.2	\$ 6.1
Total Project				
FTEs - Years	25	67	26	118
Value Added (\$ ₂₀₂₀ m)	\$ 4	\$ 8	\$ 4	\$ 16
Gross Household Income (\$ ₂₀₂₀ m)	\$ 2	\$ 4	\$ 1	\$ 7

Source: StatisticsNZ, Savvy Consulting. Results are in \$2020 and employment terms.

The above economic impacts do not include the ongoing positive economic impacts of the businesses that may establish in the proposed zone. Those positive economic impacts are additional and long term. There are other long term tangible and intangible economic benefits of the proposal that could be included here, but they are discussed further in Section 5.

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The purpose of quantifying and qualifying (Section 5) the above economic benefits is to contrast them with the economic benefits foregone (i.e. costs) of using the site for industrial activities rather than protecting it for land-based primary production over the long term.

Where land offers feasible potential for primary production (either now or in the future), this can be modelled using a range of assumptions. However, I rely on the assessment by Patersons which concludes that the proposed site is unlikely to overcome the constraint of access to water (such as would be needed for irrigation). As such, the land is considered to have negligible potential for land-based primary production over the long term, and therefore no further modelling is warranted.

As the proposed rezoning offers long term economic benefits for COD (of which only some have been quantified), and there are no foreseeable costs from utilising the LUC 3 land for industrial development, the long term benefits substantially outweigh the long term costs and I consider that the third test of clause 3.6(4)(c) has been met.



5 Conclusions

This final section of the report considers the locational attributes of the site for industrial development, as this relates directly to the NPS-UD requirement for councils to provide development capacity that is commercially feasible and reasonably expected to be realised. In the context of business land, the term 'suitable' is often substituted for feasible. This is followed by a summary of economic costs and benefits of the plan change request, and final conclusions.

5.1 Location Attributes of Proposed Industrial Zoning

This sub-section examines the suitability of the proposed site from a development or developer perspective. The NPS-UD provides flexibility on how 'suitability' is determined, but at a minimum, must include suitability in terms of location and site size. This assessment adopts a Multi Criteria Analysis (MCA) approach in keeping with the guidance under the earlier NPS-UDC.³⁹ While MCA is typically used to compare multiple options, it is still a useful framework to evaluating a single option – in this case, the proposed site.

MCA requires key metrics (criteria) to be identified that are important in the selection and development process for different land uses. Typically, each criterion is independently weighted (before being scored) in consultation with the council and other development stakeholders to determine which criteria should play a large or small role in the development and locational decision relevant to that district. In the absence of this consultation, I have excluded weighting for the purposes of this assessment and have also used a qualitative rather than numeric scale for scoring each criterion.

Table 5.1 contains criteria that are commonly applied for the assessment of sites for industrial development. I have scored each criterion using a 7 point scale (ranging from very positive through to very negative). The MCA shows that there are no negative attributes of the proposed site from an industrial development perspective. Overall, I consider that the site is suitable for Industrial Zoning and would therefore represent feasible and reasonably expected to be realised development capacity if approved.

³⁹ I have developed and applied MCA frameworks for HBAs in both Queenstown Lakes District and Rotorua District. The MCA in this section adopts criteria for industrial land development published in HBAs prepared by Market Economics Limited (where I was previously a Director and led the respective HBA/MCA projects).

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Table 5.1 – Multi Criteria Analysis of the Suitability of the Proposed Industrial Zone

Criterion	Evaluation
Ability to buffer adverse effects from residential and sensitive activities	Very Positive – the site is separated from residential zoning by State Highway 8.
Access to major road/ transport routes	Very Positive – State Highway 8 is adjacent the site.
Co-location or clustering with complementary business activities	Somewhat Positive – some industrial activities are opposite the site.
Distances to freight ports	Neutral – no site in COD is particularly close to freight ports.
Exposure and profile for future businesses	Very Positive – many sites will have signage visible from Springvale Road.
Flat site, large and contiguous parcels, supports efficient subdivision	Moderately Positive – large parts of the site are flat or only slightly sloping. While not large, it is appropriate in scale for a local industrial zone role and relative to local demand.
Single / simple ownership structure	Very Positive – the site is in single ownership.
Represents vacant capacity / greenfield	Very Positive – the site is bare land.
Low level of traffic / congestion in vicinity	Very Positive – the nearby roads and intersections do not suffer from congestion.
Low natural hazard risk	Moderately Positive – see S32A Report.
Proximity to labour force	Moderately Positive – the site is adjacent to the third largest township in COD by population.

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Proximity to resident household customers	Very Positive – Residential Zoning is located on the other side State Highway 8 and Rural Residential zoning is located south of Springvale Road.
Proximity to specialist demand sectors	Moderately Positive - horticulture and farming occurs in the rural areas surrounding Clyde.
Serviceable with network infrastructure	Moderately Positive – the site can be connected to urban infrastructure (see s32A Report).
Total Suitability	Suitable for Industrial Development

5.2 Economic Benefits

Based on the analysis carried out for this assessment and the discussion contained in previous report sections, and acknowledging that some economic benefits may be a transfer effect and not net additional to Vincent Ward, the economic benefits of the proposed rezoning can be summarised as follows:

- Development of the land and future construction of new buildings will generate value added in the COD 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 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).

Economic Assessment of Proposed Clyde Industrial Zone



- 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 short and medium term demand for Industrial Zoned land.

5.3 Economic Costs

The economic costs of the proposed rezoning can be summarised as follows:

- Introduces a new area of Industrial Zone in the district where the effects of industrial activities (externalities) need to be managed. Dispersal of industrial activities over a greater number of locations. However, as discussed in other documents supporting the plan change request, the site is appropriately located to avoid any significant adverse effects, and other effects can be appropriately remedied or mitigated.
- Occupies LUC 3 land and therefore removes the productive capacity of the land for land-based primary production over the long term. However, the site is unlikely to support land-based primary production due to permanent constraints. As such, this cost is theoretical only and does not apply in practice.
- May result in distributional effects on the Alexandra Industrial Zones. This is expected to be limited to re-capture of a portion of Clyde demand back to Clyde. Any adverse distributional effects are considered to be minor in the context of the scale of Alexandra's Industrial Zones (and likely fall under the category of trade competition).
- May result in opportunity costs for the take up vacant industrial land in Alexandra's Industrial Zones. That is, it may slow the rate of growth in Alexandra by providing a local Industrial Zone in Clyde. However, this extends the capacity of the Alexandra Industrial Zones to meet demand from its extensive catchment over the medium term (a benefit), but does not remedy a medium term shortfall of capacity in Alexandra that will also need a zoning response.

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5.4 Efficiency Conclusions

In a general sense, it is more economically efficient to consider options for expansion of existing industrial zones before creating new ones, to ensure that the adverse effects of industrial activities are consolidated in relatively few locations. However, this is not always practicable where other land uses have developed around existing Industrial Zones as they have in Alexandra, foreclosing further expansion. Further, this approach must be balanced with the need to provide for industrial activities in locations of demand.

Clyde is an urban area that already sustains industrial activity, but in the absence of a local Industrial Zone (such as provided in most other towns and settlements of the district, and now including in Pisa Moorings via PPC21) the Clyde community has been reliant on supply of industrial activities in Alexandra. This urban form is increasingly inefficient as Clyde grows – and Clyde *has* been identified as an area that is constrained by a lack of local employment and yet, can support substantial residential growth in the medium and long term.

Providing for future housing growth in Clyde as set out in PC19 and the Spatial Plan without also providing increased employment opportunities and business land, will not support a well-functioning urban environment in my view.

I consider that the proposed site is a suitable and effective location for an Industrial Zone that will contribute to a well-functioning urban environment. I do not consider there to be any other more practicable or feasible alternative locations to provide the equivalent development capacity in the locality. Providing a local Industrial Zone in Clyde responds to an insufficiency (absence) of industrial development capacity in the Clyde urban area and assists with an insufficiency of industrial development capacity in the Alexandra urban area in the medium term. Zoning of the proposed site will support the provision of at least sufficient Industrial Zone capacity in the Vincent Ward and district overall.

While the site includes LUC 3 land, there are no foreseeable costs to the productive capacity of the district associated with the proposed urban zoning. Having considered the economic costs and benefits of the proposal, I conclude that over the long term, the economic benefits far outweigh any potential costs. I support the rezoning from an economic perspective.



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Appendix A – Industrial Zone Profiles

Cromwell

1 Digit ANZSIC Description	Industrial Zone Business Count 2018	Industrial Zone Business Count 2023	Growth 2018-2023 (n)	Growth 2018-2023 (%)	Industrial Zone Employment Count 2018	Industrial Zone Employment Count 2023	Growth 2018-2023 (n)	Growth 2018-2023 (%)	Industrial Zone Business Count 2023 Distribution (%)	Industrial Zone Employment Count 2023 Distribution (%)	Total Town Business Count 2023	Total Town Employment Count 2023	Industrial Zone Share of Total Business Count 2023	Industrial Zone Share of Total Employment Count 2023
Agriculture, Forestry and Fishing *	1	4	2	192%	8	9	1	18%	1%	0%	19	32	18%	28%
Mining	-	-	-	0%	-	-	-	0%	0%	0%	-	-	0%	0%
Manufacturing	40	36	4	-10%	291	318	27	9%	13%	17%	63	383	57%	83%
Electricity, Gas, Water and Waste Services	4	7	4	106%	146	68	78	-54%	3%	4%	9	69	83%	98%
Construction	35	57	22	63%	546	591	44	8%	21%	32%	235	947	24%	62%
Wholesale Trade	32	40	8	26%	180	291	111	61%	15%	16%	54	325	74%	90%
Retail Trade	5	4	1	-15%	13	16	2	18%	2%	1%	52	488	9%	3%
Accommodation and Food Services	2	6	4	146%	3	14	11	321%	2%	1%	50	318	12%	4%
Transport, Postal and Warehousing	15	15	0	2%	225	186	-39	-17%	6%	10%	41	242	37%	77%
Information Media and Telecommunications	-	2	2	0%	-	1	1	0%	1%	0%	6	35	25%	3%
Financial and Insurance Services	7	8	1	17%	1	2	1	163%	3%	0%	36	27	21%	8%
Rental, Hiring and Real Estate Services	29	43	14	49%	24	49	25	102%	16%	3%	183	110	24%	44%
Professional, Scientific and Technical Services	12	17	5	40%	70	124	55	78%	6%	7%	70	218	24%	57%
Administrative and Support Services	3	7	4	136%	3	21	18	590%	2%	1%	34	59	20%	35%
Public Administration and Safety	2	1	1	-45%	18	3	15	-83%	0%	0%	5	27	23%	11%
Education and Training	1	2	1	120%	3	28	24	712%	1%	2%	11	269	20%	10%
Health Care and Social Assistance	4	6	2	40%	9	29	20	230%	2%	2%	29	223	21%	13%
Arts and Recreation Services	1	2	1	100%	25	27	2	7%	1%	1%	19	65	11%	42%
Other Services	9	13	4	51%	33	59	27	82%	5%	3%	43	157	30%	38%
Total Industries	201	269	68	34%	1,597	1,834	237	15%	100%	100%	958	3,994	28%	46%
Indicative Industrial Zone Industries	155	202	47	30%	1,419	1,510	91	6%	75%	82%	604	2,108	33%	72%

Source: StatisticsNZ Business Demography Statistics YE February, Sawy. * With the exception of Agricultural and forestry support services, agriculture business and employment have been removed as these are likely a result of SA1 defined areas including rural land on the fringe of each area.

Alexandra

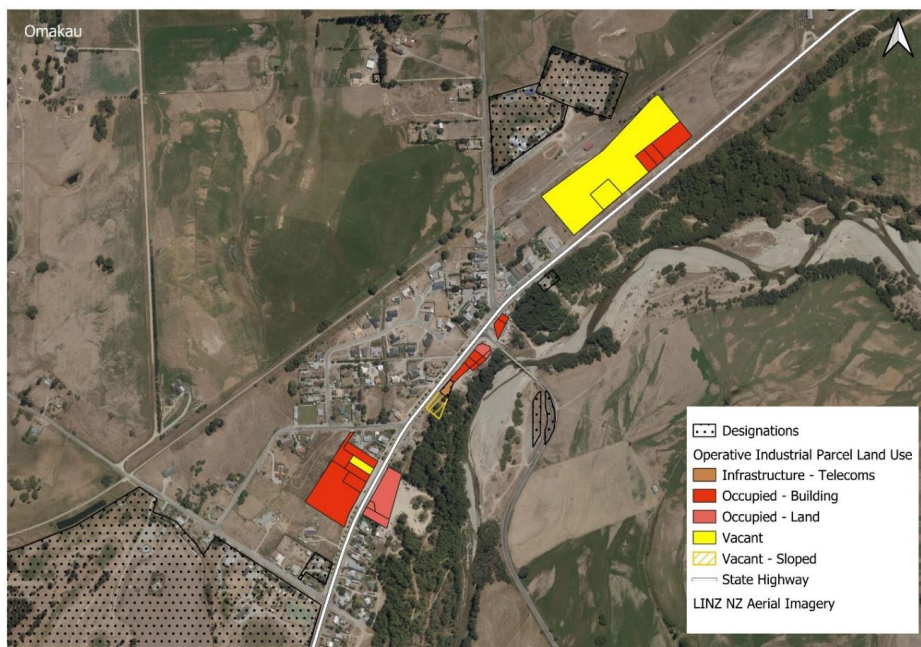
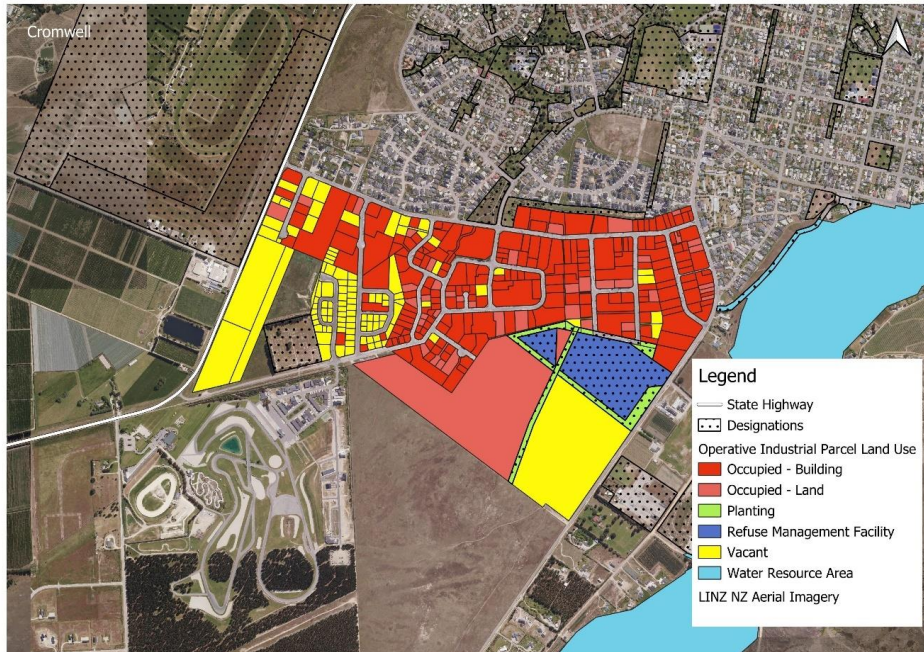
1 Digit ANZSIC Description	Industrial Zone Business Count 2018	Industrial Zone Business Count 2023	Growth 2018-2023 (n)	Growth 2018-2023 (%)	Industrial Zone Employment Count 2018	Industrial Zone Employment Count 2023	Growth 2018-2023 (n)	Growth 2018-2023 (%)	Industrial Zone Business Count 2023 Distribution (%)	Industrial Zone Employment Count 2023 Distribution (%)	Total Town Business Count 2023	Total Town Employment Count 2023	Industrial Zone Share of Total Business Count 2023	Industrial Zone Share of Total Employment Count 2023
Agriculture, Forestry and Fishing *	6	6	0	7%	29	34	5	16%	5%	3%	26	93	23%	36%
Mining	-	-	-	0%	-	-	-	0%	0%	0%	1	1	0%	0%
Manufacturing	13	10	2	-18%	84	46	-38	-45%	8%	4%	32	114	32%	41%
Electricity, Gas, Water and Waste Services	1	2	1	143%	12	3	9	-74%	1%	0%	4	40	40%	8%
Construction	15	19	4	29%	400	502	102	25%	16%	48%	135	869	14%	58%
Wholesale Trade	11	11	1	5%	74	54	-20	-27%	9%	5%	26	82	44%	66%
Retail Trade	5	4	1	-20%	30	37	7	23%	3%	4%	64	565	6%	7%
Accommodation and Food Services	1	2	1	82%	2	30	29	1800%	2%	3%	42	276	5%	11%
Transport, Postal and Warehousing	4	4	1	-19%	124	64	-61	-49%	3%	6%	20	121	18%	53%
Information Media and Telecommunications	2	-	2	-100%	1	-	1	-100%	0%	0%	7	26	0%	0%
Financial and Insurance Services	2	4	1	61%	1	1	0	25%	3%	0%	52	74	7%	1%
Rental, Hiring and Real Estate Services	18	22	4	21%	6	11	5	83%	18%	1%	160	82	14%	13%
Professional, Scientific and Technical Services	12	19	8	65%	45	69	24	53%	16%	7%	80	310	24%	22%
Administrative and Support Services	4	5	1	26%	74	79	5	6%	4%	8%	30	876	18%	9%
Public Administration and Safety	2	1	2	-63%	4	12	8	188%	1%	1%	13	243	7%	5%
Education and Training	3	3	0	-4%	28	13	-14	-52%	2%	1%	17	260	15%	5%
Health Care and Social Assistance	4	3	2	-41%	43	46	3	7%	2%	4%	34	373	8%	12%
Arts and Recreation Services	3	2	2	-48%	24	20	4	-17%	1%	2%	15	64	11%	31%
Other Services	7	6	1	-16%	48	30	-17	-37%	5%	3%	57	194	10%	16%
Total Industries	112	121	9	8%	1,027	1,049	22	2%	100%	100%	815	4,661	15%	23%
Indicative Industrial Zone Industries	67	74	7	10%	729	713	-16	-2%	61%	68%	404	1,401	18%	51%

Source: StatisticsNZ Business Demography Statistics YE February, Sawy. * With the exception of Agricultural and forestry support services, agriculture business and employment have been removed as these are likely a result of SA1 defined areas including rural land on the fringe of each area.



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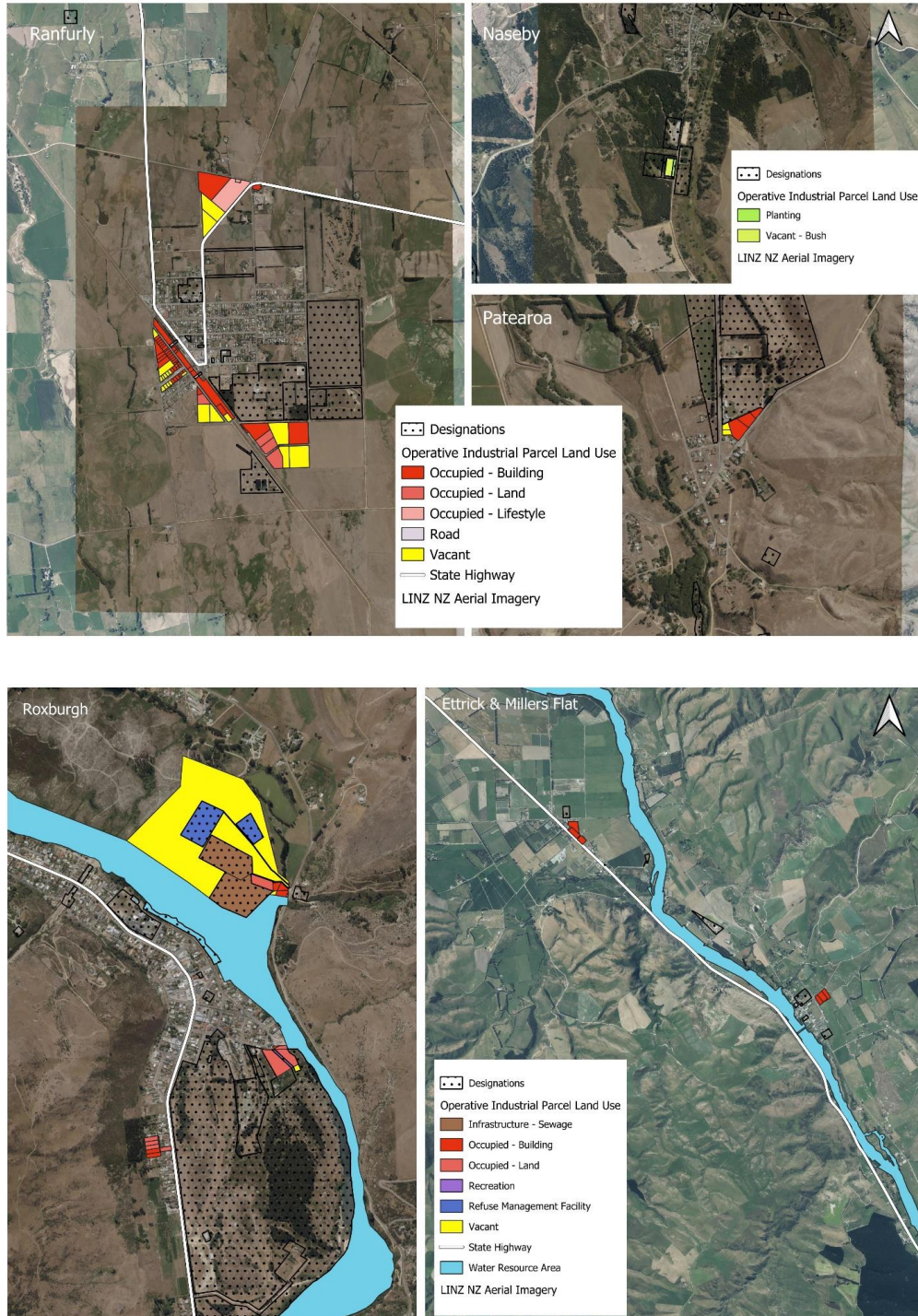
Appendix B – Vacant Capacity



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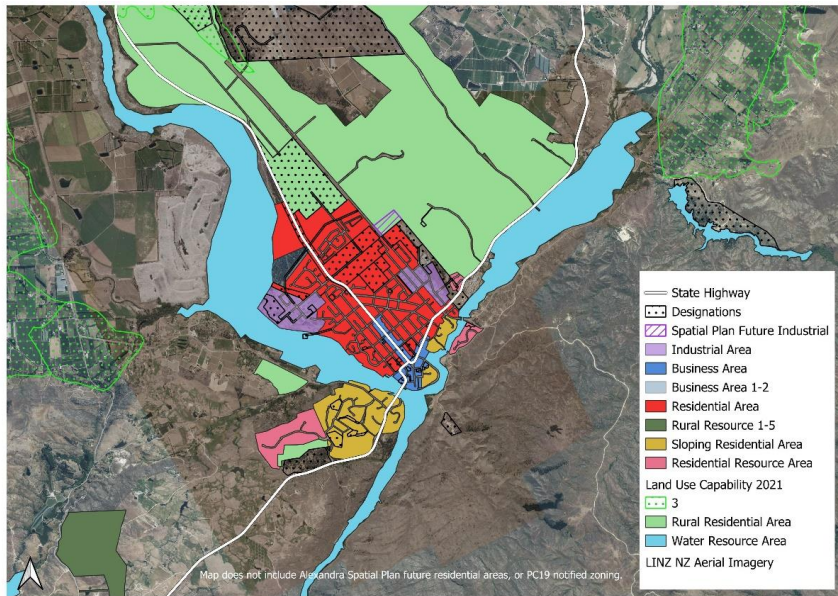




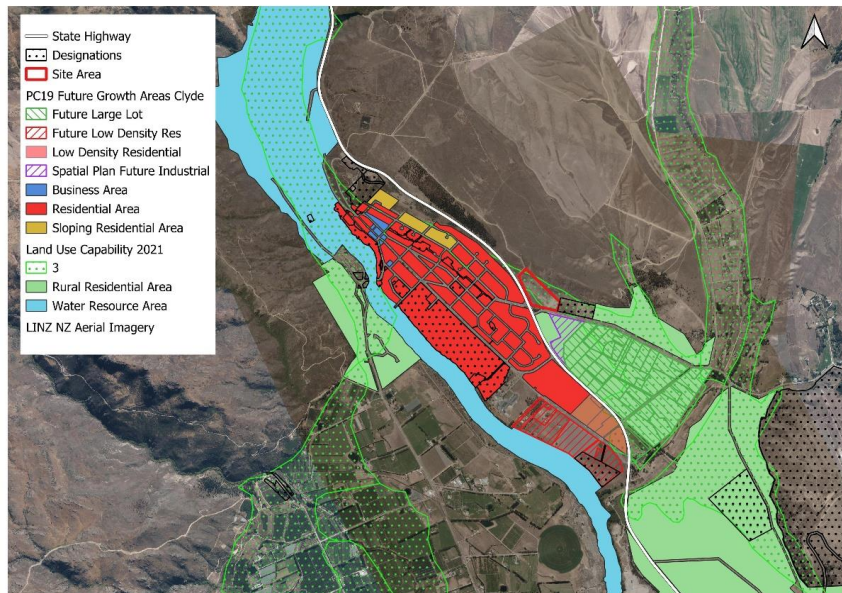
Economic Assessment of Proposed Clyde Industrial Zone

Appendix C – HPL Maps

Alexandra



Clyde





Appendix D – Economic Impact Terminology & Assumptions

Multiplier analysis is a commonly used modelling technique for measuring economic impacts. Direct, indirect and induced economic impacts can be estimated using multipliers derived from regional or national input-output tables. Multipliers are summary measures of the economic interdependence between industries and final demand. The contribution of an industry to an economy is not limited to the value it creates directly. This is because an increase in final demand for an industry has repercussions throughout the whole economy, causing increases in output beyond the initial change in demand. This is known as the multiplier effect. The higher the multiplier the more far-reaching the local value added and employment impacts are likely to be from an increase in demand.

The most common limitations of all input-output based modelling (including multiplier analysis) is the historical and fixed nature of multipliers which are typically calculated from input-output tables from surveys undertaken several years earlier. Therefore, they may not accurately reflect the relationships between sectors in the current economy.⁴⁰ This assessment relies on the latest national input-output table prepared by StatisticsNZ⁴¹ which reflects the economy in the year ending June 2020. While the construction sector has faced significant cost increases since 2020, it is considered that the supply chain structure of all industry sectors (including the construction sector) is still broadly relevant today.

This assessment includes the following types of economic impacts:

- a) Direct effects – which capture onsite and offsite activities directly engaged by the proposed project;
- b) Indirect effects – which arise when businesses working directly on the project stimulate the creation of further demand through the purchases that they make in other sectors of the economy; and

⁴⁰ In the real world, technical relationships will change over time. These changes are driven by new technologies, relative price shifts, product substitutions and the emergence of new industries. For this reason, input-output analysis is generally regarded as suitable for short-run analysis, where economic systems are unlikely to change greatly from the initial snapshot of data used to generate the base input-output table.

⁴¹ Accessed, with thanks, from Insight Economics.

Economic Assessment of Proposed Clyde Industrial Zone



- c) Induced effects – which arise from the increased demand for goods and services made by households who have received increased income as a result of the direct and indirect effects of the project.

These economic impacts have been measured in terms of:

- Contributions to value-added (akin to GDP). Value added is the principal measure of economic activity, and is estimated as operating surplus, wages and salaries paid to staff and working proprietors, depreciation, taxes and subsidies.
- The number of FTEs employed – which is measured in terms of full-time equivalent workers (FTEs) for a 12-month period.
- Total wages and salaries paid to workers, which are often labelled 'gross household incomes'.

Assumptions and Modelling Inputs

For simplicity, I have adopted the multipliers from the following industry sectors contained in the national input-output table:

- Design/planning/consents – 100% to the 'Scientific, architectural and engineering services' sector.
- Land development – 100% to the 'Heavy and civil engineering construction' sector.
- Commercial construction – 100% to the 'Non-residential building construction' sector.

Other key assumptions for the modelling are as follows:

- Anticipated expenditure is deflated to June 2020 prices prior to applying the June 2020 multipliers. This is done using the Producers Price Index.
- Economic impacts are expressed in 2020 dollar and employment terms. It is not appropriate to re-inflate economic impacts to dollars of the day.
- The national multipliers are assumed to represent the multipliers that applied in the COD in June 2020. That is, it is assumed that industries in the COD economy have the same interdependencies with other industries as they do nationally.
- All direct expenditure on the proposed development, including indirect and induced spending, is assumed to be with business located in COD. That is, 100% of the impact is assumed to accrue to the COD economy, with no leakage to other districts or regions.

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Economic Assessment of Proposed Clyde Industrial Zone

Caveats

These district economic impacts apply to the proposed development. It is important to acknowledge that these same or similar impacts would arise from a development of a similar scale and composition in another location in COD and are not entirely unique to this proposal/site.

Furthermore, some of these impacts would be a result of expenditure that is transferred from other locations in the district. Specifically, if the proposal was not approved for development, one would typically expect that the demand for industrial activities would be satisfied in another location within the district. This means that at a district level much of the economic value associated with the proposal may not be net additional or new, as this value would occur regardless of whether the proposed development occurs or not.

That said, to the extent that the proposal addresses a shortfall in industrial zone capacity in the locality of demand, that may not necessarily be addressed through other planning processes in a timely manner, then more of the economic impact can be considered net additional. This is because a shortfall of industrial zone capacity may result in some business growth being directed elsewhere (or being suppressed). In this light, the proposed development can be seen as enabling projected growth.

Development is also contingent on available land in suitable locations for urban growth, landowners willing to develop that land, and landowners having the financial capability and experience to develop – such as the applicant. These combined attributes are rare in any district, and this means that more, rather than less, of the estimated economic impacts can be treated as net additional and specific to the proposal.

Savvy Consulting Ltd
46 Kennedy Crescent
Wanaka 9305

27th September 2024

Adam Vincent
Planning Officer
Central Otago District Council
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 17th 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 27th September 2024. The previous version of the Report should be disregarded.

Kind regards

Natalie Hampson

Director

natalie@savvyconsulting.co.nz



Hartley Road Partnership

Private Plan Change Springvale Road, Clyde

Transportation Assessment





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1. Introduction

- 1.1. Hartley Road Partnership is lodging a private plan change request for its site at Springvale Road, Clyde (**the site**). The site is presently zoned as Rural in the Central Otago District Plan, and the plan change seeks that this is changed to Industrial.
- 1.2. This Transportation Assessment sets out an evaluation of the transportation issues associated with the development that would be facilitated by the rezoning, including changes in travel patterns that are likely to arise. Where potential adverse effects are identified, possible ways in which these can be addressed are set out.
- 1.3. This report is cognisant of the guidance specified in the New Zealand Transport Agency's '*Integrated Transport Assessment Guidelines*' and although travel by private motor vehicle is addressed within this report, in accordance with best practice the importance of other transport modes is also recognised. Consequently, travel by walking, cycling and public transport is also considered.



2. Site Overview

2.1. Location

2.1.1. The site is located on the eastern side of Clyde, immediately east of the State Highway 8 / Springvale Road intersection.

2.1.2. The location of the site in the context of the local area is shown in Figure 1 and in more detail in Figure 2.

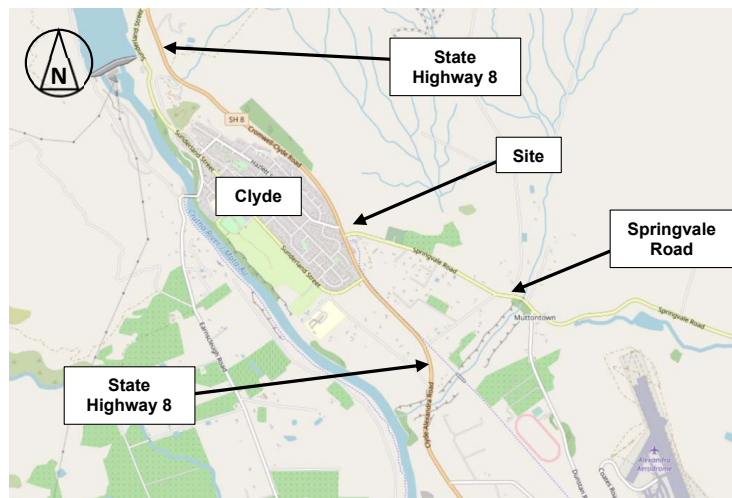


Figure 1: General Location of Site



Figure 2: Aerial Photograph of Site and Environs



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2.2. Road Hierarchy

- 2.2.1. Under the District Plan roading hierarchy, State Highway 8 is classified as a highway and Springvale Road is an Arterial Road. Although the District Plan does not define road types, the New Zealand Transport Agency Waka Kotahi (**Waka Kotahi**) specifies that state highways have a “*nationally strategic purpose in moving people and goods*”, with the One Network Road Classification setting out that Arterial Roads “*make a significant contribution to social and economic wellbeing [and] link regionally significant places, industries, ports or airports*”.
- 2.2.2. Hazlett Street is an Urban Local Road, and such roads typically carry lower traffic flows and provide a high degree of property access.

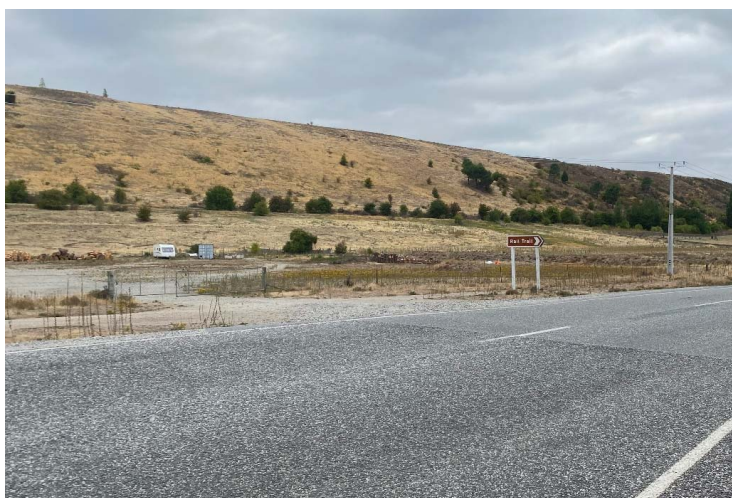




3. Current Transportation Networks

3.1. *Roading Network*

- 3.1.1. Although the site has frontage onto State Highway 8, the topography (a difference in levels) means that it is challenging to achieve any access onto it. Accordingly, no access is proposed onto the highway and rather, will be gained from Springvale Road only.
- 3.1.2. The site presently has one access point, located around 140m from the state highway. This is formally constructed with a metalled road surface and a gate at the site boundary.



Photograph 1: Site Access Looking East

- 3.1.3. Adjacent to the site, Springvale Road has a flat alignment which curves gently from its intersection with the highway. The road provides one traffic lane in each direction of 3.5m width, and has a centreline and edgeline markings, with edge marker posts also present. The width of the sealed shoulder is variable, between 0.3m and more than 2m, the latter being on the northern side of the road just east of the highway.
- 3.1.4. Springvale Road is subject to an 80km/h speed limit and has a legal width of 40m, which widens to more than 80m nearer to the highway.



Photograph 2: Springvale Road Looking East

3.1.5. The very wide legal road width creates an unusual scenario whereby there is an informal access to the extra road reserve width that lies around 60m east of the highway and is formed with a very wide (40m) splay, enabling cars can turn into an unformed car parking area between the site boundary and the formed road.



Figure 3: Road Reserve Towards Southwest of Site



Photograph 3: Informal Access to Wide Road Reserve Looking East

- 3.1.6. To the immediate east of the site, the road alignment straightens but continues with the same cross-section. It provides access to a number of rural residential properties before terminating at State Highway 85 approximately 8m east of the site.
- 3.1.7. Opposite the site access is a small access road that serves a small number of activities including a Department of Conservation base for the Rail Trail (discussed further below) and fire service offices. There is also a roadway that runs parallel to Springvale Road for a distance of around 230m.



Photograph 4: Access opposite Site Access, Looking East

- 3.1.8. At the southwestern corner of the site, Springvale Road meets State Highway 8 at a priority ('give-way') intersection. Approximately 90m to the north, Hazlett Street joins the highway from the west at a 'stop' controlled intersection, and the two operate as offset (staggered) tee-intersections. The intersection is constructed with a high-capacity layout and consequently there are auxiliary right-turn lanes for the movements from State Highway 8 to Springvale Road (south to east) and State Highway 8 to Hazlett Street (north to west), and a left-turn lane for



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the movement from State Highway 8 to Hazlett Street (south to west). The Springvale Road approach is also constructed with an auxiliary left-turn lane, separating this movement from the movement onto State Highway 8 (north) and Hazlett Street.

- 3.1.9. There is no auxiliary turning lane for the State Highway 8 to Springvale Road (north to east) movement, but there is a wide (3m) shoulder marked with diagonal shoulder markings (MOTSAM 2.04) which in practice is used by drivers as a left-turn lane, with southbound traffic remaining in the formally marked traffic lane. This shoulder is well over 100m in length.



Photograph 5: Wide Shoulder on State Highway 8, North of Springvale Road

- 3.1.10. State Highway 8 is subject to a 100km/h speed limit, but sight distances for all turning movements at the State Highway 8 / Springvale Road and State Highway 8 / Hazlett Street intersections are appropriate for this speed environment.



Photograph 6: State Highway 8 / Springvale Road Intersection Looking North



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3.1.11. Towards the south, the highway has a flat and gently curving alignment, and provides access to Alexandra, terminating towards the south of Dunedin. To the north of Hazlett Street, the highway curves towards the northwest and starts to rise. It provides access to Cromwell but continues further to the northwest, terminating at Timaru.

3.2. Non-Car Modes of Travel

- 3.2.1. Given the current rural nature of the land, there is no specific infrastructure for pedestrians in the immediate area of the site. However, there grassed verges can be used for walking.
- 3.2.2. The Central Otago Tail Trail commences/terminates within the area immediately opposite the at the eastern site access, know as the Clyde Railhead. The route itself does not pass the site, but rather, runs southwards from this location alongside the state highway, but the accessway provides access to the car park for those that are starting (or ending) the trail.
- 3.2.3. There is also an underpass beneath the highway, located 50m to the south of Springvale Road, which provides a route for pedestrians and cyclists to cross the highway, and connects the Rail Trail with the minor road network within Clyde township.



Photograph 7: Underpass below State Highway 8

3.3. Future Changes

- 3.3.1. There are no known changes to the roading infrastructure in the vicinity of the site.



4. Current Transportation Patterns

4.1. Traffic Flows

4.1.1. Waka Kotahi carries out regular traffic counts on the state highway network throughout the country. The closest counter locations to the site are located alongside Lake Dunstan (around 6km north of the site) and near Alexandra Golf Club (5km south of the site). Neither location is likely to be fully representative of traffic volumes at the site but both are helpful indicators of traffic flows.

4.1.2. The two-way traffic flows recorded at each counter in 2023¹ are as follows:

- North of the site (counter id: 00800313):
 - Average Annual Daily Traffic: 6,140 vehicles
 - Weekday morning peak hour: 490 vehicles
 - Weekday evening peak hour: 600 vehicles
- South of the site (counter id: 00800325):
 - Average Annual Daily Traffic: 6,550 vehicles
 - Weekday morning peak hour: 510 vehicles
 - Weekday evening peak hour: 630 vehicles

4.1.3. It can be seen that the traffic flows near Alexandra are greater than those north of Clyde. This is likely to be due to the Alexandra counter recording movements by residents between Clyde and Alexandra, which will therefore not occur to the north of Clyde (or past the site). However the difference between the values is only in the order of 5%.

4.1.4. As part of this commission, weekday peak hour traffic flows were observed at the State Highway 8 / Springvale Road and State Highway 8 / Hazlett Street intersections. The surveys were carried out in February 2024, and the results are shown below.

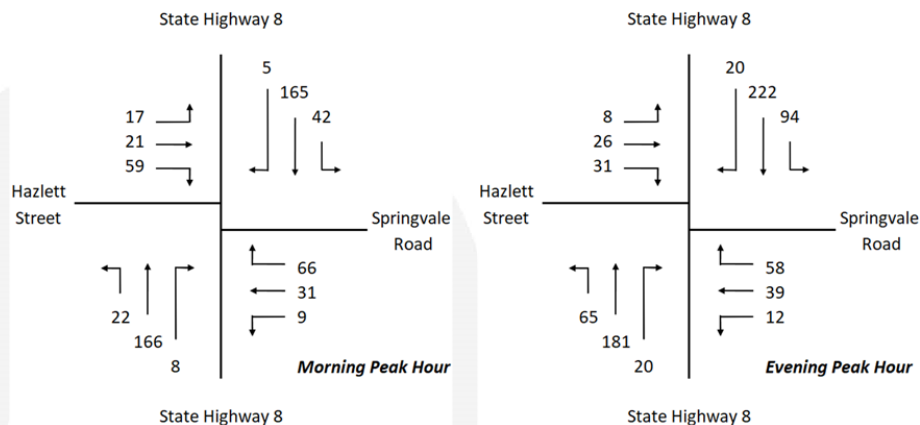


Figure 4: 2024 Traffic Flows at the State Highway 8 / Springvale Road / Hazlett Street Intersections (without Plan Change)

4.1.5. The survey results noted above show the maximum volumes turning through the intersection, which does not necessarily coincide with the maximum volumes on the highway at the counters. However when the counter towards the north is considered, the observed traffic

¹ Rounded to the nearest 10 vehicles)



counts vary by only 2.5% from the volumes recorded by the automatic traffic counter further north. It can therefore be concluded that the observed traffic flows are typical of the prevailing traffic volumes on the network.

- 4.1.6. The traffic counters show that over the past ten years, volumes have grown by 4.0% per annum to the north and 2.6% per annum towards the south of the site (expressed as a percentage of 2023 volumes). For the purposes of this assessment, a mean value of 3.3% growth per annum has been applied. The same factor has been applied to the minor approaches.
- 4.1.7. The intersection has been modelled with these 2024 observed traffic volumes (factored by ten years to a 'design year' of 2034) and using the computer software package Sidra Intersection. The results are summarised below. For this exercise the presence of a left-turn lane has been modelled, as this is the way that drivers use the highway.

Road and Movement		Morning Peak Hour			Evening Peak Hour		
		Avg Delay (secs)	95 %ile Queue (veh)	Level of Service	Avg Delay (secs)	95 %ile Queue (veh)	Level of Service
State Highway 8 (south)	L	9.0	0.0	A	9.0	0.0	A
	R	8.6	0.0	A	9.0	0.1	A
Springvale Road	L	7.9	0.0	A	8.4	0.1	A
	T	13.7	1.5	B	21.2	2.2	C
	R	16.2	1.5	C	23.3	2.2	C
State Highway 8 (north)	L	8.7	0.2	A	8.8	0.4	A
	R	8.6	0.0	A	8.7	0.1	A
Hazlett Street	L	5.6	0.1	A	5.6	0.0	A
	T	9.5	1.1	A	12.5	1.0	B
	R	12.7	1.1	B	17.4	1.0	C

Table 1: Peak Hour Levels of Service at the State Highway 8 / Springvale Road / Hazlett Street Intersections (without Plan Change)

- 4.1.8. It can be seen that the intersection provides a good level of service with only small queues and modest delays.
- 4.1.9. The Austroads Guide to Traffic Management Part 6 (*'Intersections, Interchanges and Crossings'*) sets out warrants for when auxiliary turning lanes are required, based upon peak hour traffic flows and speeds. In this case, turning lanes are provided for all movements off the state highway other than the left-turn into Springvale Road.
- 4.1.10. The warrants set out that a left-turn lane is assessed using the volume of traffic turning left and the volume of through traffic travelling in the same direction of the left-turning vehicles. For the combination of 253 southbound vehicles and 94 left-turning vehicles, an auxiliary left-turn lane is presently required. The absence of the turning lane if therefore an existing shortfall in the roading network.

4.2. Non-Car Modes of Travel

- 4.2.1. Given that the area around the site is largely rural, it can reasonably be expected that it will be relatively infrequently used by pedestrians and cyclists. As such, the current levels of provision are considered to be adequate.



4.2.2. There are no scheduled public transport services that operate adjacent to the site, although there are longer-distance services that pass on the state highway.

4.3. Road Safety

4.3.1. The NZTA Crash Analysis System has been used to establish the location and nature of the recorded traffic crashes in the vicinity of the site. All reported crashes on the roading network within 250m of the State Highway 8 / Springvale Road / Hazlett Street intersections, and for a distance of 250m from the site eastern boundary, were identified for the period 2019 to 2023 plus the partial record for 2024.

4.3.2. This showed that five crashes had been reported:

- Three crashes occurred at the State Highway 8 / Springvale Road intersection:
 - One crash occurred when a driver turned right out of Springvale Road (intending to travel straight ahead into Hazlett Street) but failed to give-way to a southbound vehicle on the highway. The crash resulted in minor injuries.
 - One crash occurred when a driver turned right out of Springvale Road and struck a vehicle that had just turned right out of Hazlett Street. The crash resulted in minor injuries.
 - One crash occurred when a driver turned right out of Springvale Road and struck a cyclist that had turned right out of Hazlett Street. The crash resulted in minor injuries.
- Two crashes occurred at the State Highway 8 / Hazlett Street intersection:
 - One crash occurred when a driver turned right out of Hazlett Street but failed to give-way to a northbound vehicle on the highway. The crash did not result in any injuries. The police report noted that the car on the highway was following close to a large truck and was not easily visible.
 - One crash occurred when a driver turned right out of Hazlett Street and struck a vehicle that had just turned right out of Springvale Road. The crash did not result in any injuries.

4.3.3. It is not considered that the crash record indicates any inherent safety related issues at the intersections. The crash rate at the two intersections is low, and generally have different contributing factors. It is plausible however that the crash record at the State Highway 8 / Springvale Road is influenced by the lack of the required left-turn lane (discussed above).



5. Proposal

- 5.1. The Site is approximately 6.4ha in size, and the rezoning which is sought is for Industrial.
- 5.2. Since the nature of a plan change is for a rezoning of the site, no specific layout plan for the future subdivision of the site is available. However an indicative plan has been prepared, which is useful in order to ensure that all transportation-related matters have been properly considered. This is shown below.



Figure 5: Indicative Subdivision Layout (Extract from Paterson Pitts Drawing)

- 5.3. As set out previously, the topography does not support any access onto the highway and therefore all access is gained from Springvale Road.



6. Traffic Generation and Distribution

6.1. Traffic Generation

- 6.1.1. The bulk of standard traffic generation rates for industrial activities are based on floor areas rather than total site area, and since there is no specific layout for the site, this is not known. However other plan changes have adopted the following traffic generation rates.

Industry Type	Trip Generation Rates (Vehicle Movements Per Hectare)					
	Morning Peak Hour		Evening Peak Hour		Daily	
	In	Out	In	Out	In	Out
Light	13.9	2.5	5.4	12.7	53.5	53.5
Heavy	8.5	7.3	4.9	5.5	40.5	40.5

Table 2: Traffic Generation Rates for Industrial Activities

- 6.1.2. It can be seen that light industrial activities typically have a greater traffic generation than heavy industrial activities. For a robust assessment, the use of the site for light industrial activities has been allowed for within this analysis. Thus the traffic anticipated to arise is as follows:

Time Period	Traffic Generation	
	In	Out
Morning Peak Hour	89	16
Evening Peak Hour	35	81
Total	342	342

Table 3: Traffic Generation of Full Development of Rezoned Site

6.2. Trip Distribution

- 6.2.1. Because of the location of the site, it is considered likely that the bulk of drivers would seek to travel to/from the state highway, meaning that the majority of traffic will pass through the State Highway 8 / Springvale Road / Hazlett Street intersection. In order to ensure that the assessment of this intersection is robust, all generated traffic has been assigned to pass through the intersection. In practice, some will be associated with travel to/from the east, which will reduce volumes passing through the intersection and meaning that queues and delays are lower than anticipated in the subsequent analysis.
- 6.2.2. During the morning and evening peak hours, the majority of vehicles are associated with travel between home and employment purposes (and are therefore light vehicles). Depending on the nature of the activities that may establish within the site, employees may live towards the west (in Clyde), north (Cromwell) or south (Alexandra), but this will depend on the nature of the activities. Consequently the generated traffic has been apportioned in accordance with the current distribution of traffic.
- 6.2.3. The traffic generation of the Site is therefore as follows:

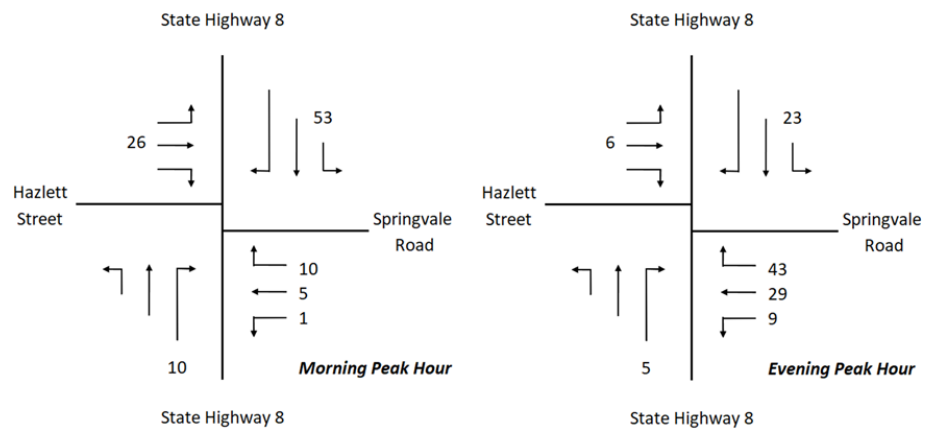


Figure 6: Traffic Flows Generated at Full Development of Site





7. Effects on the Transportation Networks

7.1. Roading Network Capacity

7.1.1. The State Highway 8 / Springvale Road and State Highway 8 / Hazlett Street intersections have been remodelled using the computer software package Sidra Intersection, with the 'design year' traffic flows plus development of the rezoned site. The results are summarised below.

Road and Movement		Morning Peak Hour			Evening Peak Hour		
		Avg Delay (secs)	95 %ile Queue (veh)	Level of Service	Avg Delay (secs)	95 %ile Queue (veh)	Level of Service
State Highway 8 (south)	L	9.0	0.0	A	9.0	0.0	A
	R	8.6	0.1	A	9.0	0.1	A
Springvale Road	L	7.9	0.0	A	8.4	0.1	A
	T	15.4	2.0	C	30.6	5.0	D
	R	18.9	2.0	C	33.2	5.0	D
State Highway 8 (north)	L	8.9	0.3	A	8.9	0.4	A
	R	8.6	0.0	A	8.7	0.1	A
Hazlett Street	L	5.6	0.1	A	5.6	0.0	A
	T	10.3	1.5	B	13.1	1.1	B
	R	13.8	1.5	B	19.2	1.1	C

Table 4: Peak Hour Levels of Service at the State Highway 8 / Springvale Road / Hazlett Street Intersections (with Plan Change)

Road and Movement		Morning Peak Hour			Evening Peak Hour		
		Avg Delay (secs)	95 %ile Queue (veh)	Level of Service	Avg Delay (secs)	95 %ile Queue (veh)	Level of Service
State Highway 8 (south)	L	-	-	-	-	-	-
	R	-	+0.1	-	-	-	-
Springvale Road	L	-	-	-	-	-	-
	T	+1.7	+0.5	B to C	+9.4	+2.8	C to D
	R	+2.7	+0.5	-	+9.9	+2.8	C to D
State Highway 8 (north)	L	+0.2	+0.1	-	+0.1	-	-
	R	-	-	-	-	-	-
Hazlett Street	L	-	-	-	-	-	-
	T	+0.8	+0.4	A to B	+0.6	+0.1	-
	R	+1.1	+0.4	-	+1.8	+0.1	-

Table 5: Difference in the Peak Hour Levels of Service at the State Highway 8 / Springvale Road / Hazlett Street Intersections (with and without Plan Change)

7.1.2. As would be expected, queues and delays increase due to the traffic generated by the rezoned site. In practice though, there are minimal effects on each turning movement other than for Springvale Road in the evening peak hours, where queues increase by up to 3 vehicles and additional delays are in the order of 10 seconds per vehicle. Given that this is associated with



the right-turn movement from a minor approach (which is always the turn and approach that experiences the greatest delays), this outcome is not unusual.

- 7.1.3. The greatest level of service is D in each case, which is not unreasonable for an intersection in the peak hour (especially noting that the analysis allows for ten years of ambient traffic growth plus full development of the site using the higher of the trip generation rates and for all traffic to pass through this location).

7.2. Revisions to Existing Roads and Site Access

- 7.2.1. As set out previously, there is currently an existing shortfall in the intersection geometry because there is no left-turn lane from State Highway 8 (north) to Springvale Road. As traffic volumes grow due to ambient growth, the need for this turning lane will also increase. Waka Kotahi typically prefers to have left turning lanes separated from the through traffic lane in order to ensure that left-turning vehicles do not obstruct the visibility of any other through traffic, meaning that the formed width of the lane is greater than if the lane was constructed to be immediately adjacent to the through lane.
- 7.2.2. However, in this case the southbound traffic lane of State Highway 8 is separated from the site boundary by more than 19m, meaning that there is ample width for an appropriate left-turn lane to be constructed wholly within the existing legal highway corridor. That is, no additional land is required within the site in order for the turning lane to be constructed.
- 7.2.3. No revisions are required to be made to the formed width of the state highway as a result of the additional traffic generated by development of the site.
- 7.2.4. The site access will need to be upgraded and formed as a road, but there are no impediments to achieving an appropriate layout. Applying the warrants for turning lanes noted previously, it is unlikely that any auxiliary lanes will be required due to the relatively low traffic flows, but this can be assessed further at time of subdivision. Springvale Road in this location has a 40m legal width, which is ample for widening the seal to provide turning lanes, in the (unlikely) event that they were to be required.
- 7.2.5. As noted above, the traffic lanes on Springvale Road are each 3.5m wide, but the shoulder width is variable, between 0.3m and more than 2m. Arterial Roads are not considered within the Council's Engineering Code of Practice, but Collector Roads are expected to have a 7.0m carriageway width and metalled shoulders of 0.25m. Springvale Road provides this carriageway width and has sealed shoulders. It is therefore considered that the current formation of Springvale Road is appropriate for the expected increase in traffic associated with development of the site.
- 7.2.6. If any widening is required, this can be considered further when land use / subdivision consents are sought. The legal width of the road is easily able to accommodate any minor improvements in the width.

7.3. Non-Car Modes of Travel

- 7.3.1. It is unlikely that development of the site will lead to increased volumes of walking and cycling, as the nature of industrial activities is that they tend to be focussed on movement of goods and materials using motorised vehicles. If there are movements associated with employee travel, these will be moderate (due to the size of the site) and consequently it is not considered that any additional infrastructure is required for pedestrians or cyclists. The underpass beneath



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the highway also provides a viable way in which movements can be carried out between the site and the district roads within Clyde.

- 7.3.2. However, it is commonly accepted that pedestrians will walk for a maximum of 1km to a destination, and cyclists will travel for a maximum of 3km. Anticipating that all movement via the underpass, approximately 35% of the residential areas of Clyde are within a viable walking distance of the site with all of Clyde being within a 3km cycling distance. The site is therefore well-located for these modes of travel, with the routes being lightly-trafficked district roads subject to a slow (50km/h) speed limit.
- 7.3.3. The size of the subdivision is not sufficient that it will give rise to the need for a public transport service.

7.4. Road Safety

- 7.4.1. The crash history in the vicinity of the site does not indicate that there are any particular features or factors that would be affected by development permitted under the rezoning.
- 7.4.2. The site access can be expected to meet current guides and standards, and therefore is highly unlikely to give rise to an adverse road safety effect.
- 7.4.3. It is anticipated that the proposed access to the Site will meet current guides and standards, and as such, can be expected to function safely. For a speed limit of 80km/h, sight distances of 210m would be expected under the Austroads Guide to Road Design Part 4A ('Unsignalised and Signalised Intersections'). This is achieved towards the east. Towards the west, the presence of the intersection with the highway serves to reduce the sight distances but vehicles approaching from this direction must have slowed to negotiate the intersection geometry (to avoid losing control) and will therefore not be travelling at the posted 80km/h speed limit. The sight distance provided will be in the order of 160m, which is appropriate for an operating speed of 70km/h. Appropriate sightlines will therefore be provided in each direction for traffic turning to and from the site.



8. Statutory Framework

8.1. Introduction

- 8.1.1. There are a number of statutory documents that are relevant to plan change requests. These are discussed in detail below, together with an assessment of whether the plan change request aligns with the strategic guidance given.

8.2. Otago Regional Land Transport Plan 2021-2031

- 8.2.1. The purpose of the RLTP is to support a vision of *“a transport system providing integrated, quality choices that are safe, environmentally sustainable and support the regions wellbeing and prosperity”*.

- 8.2.2. The key long-term strategic objectives are to:

- Enable inclusive access by improving the transport choices people across Otago and Southland have to connect with each other and participate in society;
- Invest in healthy and safe people by prioritising investment in areas of highest risk to reduce injury and support active travel;
- Support the regions' transition to net zero carbon emissions for improved environmental sustainability;
- Develop greater understanding of risk from natural and human-made hazards and improve the regions' assets for better resilience and security, and
- Contribute to Otago and Southland's economic prosperity by investing in network deficiencies that limit the movements of people and products, and create a resilience risk to economic activity.

- 8.2.3. The site is well located in respect of Clyde, with walking and cycling being viable transport choices. If there was to be a local bus network within Clyde in future, or if longer-distance services were to stop nearby, then one location would be in the vicinity of the State Highway 6 / Springvale Road intersection. This would therefore result in the site being accessible by public transport.

- 8.2.4. Traffic generated by development of the plan change area can be accommodated on the roading network with appropriate levels of service, and so there are no reasons to anticipate that adverse road safety effects would arise nor that matters relating to the resilience of the transport network would be generated with regard to efficiency.

- 8.2.5. The site gains access onto an Arterial Road which connects to a state highway. This aligns with the main function of these roads, to support the movement of goods and support economic wellbeing.

8.3. Otago Regional Public Transport Plan 2021-2031

- 8.3.1. This Plan focusses on areas with higher numbers of residents, such as the Wakatipu Basin and Dunedin. As such, there is little mention made of Clyde or surrounding areas. However the plan change request does not preclude the ability to implement public transport in future.



8.4. Central Otago District Plan

8.4.1. The District Plan sets out a number of transportation-related rules with which any development is expected to comply. Although the proposal is for a plan change, consideration of these rules is important at this stage in order to identify whether the plan change provisions should seek to exempt development from any rules, or conversely, to introduce new rules specific to the site.

8.4.2. Consequently an assessment of the plan change provisions against these rules has been undertaken and the results are summarised below.

8.4.3. District Plan Part 12.7.1: Access Standards from Roads: Part (ii): Sight Distances

8.4.3.1. Under the District Plan, assuming that roads within the site are subject to a speed limit of 50km/h then each lot requires a sight distance of 40m at its access. This can be achieved through careful site layout design.

8.4.3.2. A sight distance of 200m is required at the proposed new intersection serving the site. As discussed above, this will not be achieved towards the west due to the presence of the state highway, but the sight distance available will be appropriate for the prevailing vehicle speeds.

8.4.4. District Plan Part 12.7.1: Access Standards from Roads: Part (iii): Access to Rural Arterial Roads

8.4.4.1. This part of the District Plan requires accesses to be constructed to particular layouts. These can be achieved.

8.4.5. District Plan Part 12.7.2: Parking: Part (i): Number of Spaces

8.4.5.1. At this stage, no detailed layout has been produced for the site. However their likely size means that each will be able to provide a range of car parking spaces, meeting Plan requirements.

8.4.6. District Plan Part 12.7.2: Parking: Part (ii): Parking in Excess of Three Spaces

8.4.6.1. It is likely that lots will provide more than three parking spaces, but the design is able to achieve the provisions of this rule.

8.4.7. District Plan Part 12.7.3: Loading and Manoeuvring: Part (i): Servicing Activities

8.4.7.1. The proposal is for industrial activity and so the loading and unloading of goods is likely to occur frequently. There is no reason why loading would need to be carried out from the road, and the site will be designed to accommodate the expected types of larger vehicles that may be present.

8.5. Council's Engineering Code of Practice

8.5.1. The Council has a Code of Practice which sets out appropriate widths for the internal roads within the plan change site. It is not considered that there are any reasons why these could not be met.

8.6. Waka Kotahi Planning Policy Manual

8.6.1. The Planning Policy Manual sets out that there is expected to be a separation distance between any access onto a side road and a state highway. This can be achieved.



8.7. Other Matters

8.7.1. The Austroads Guide to Road Design Part 4 (Parts B.2.2) sets out that it is desirable for intersections to be separated from one another by five seconds of travel time in order to allow drivers to process the intersection and road layout. As set out above, it is unlikely that drivers would approach the site from the west at speeds of 80km/h because of the need to negotiate the geometry of the intersection with the state highway. However even allowing for this speed, this would mean that a separation of 115m would be required between the proposed site access and the highway, and this can be achieved.

8.8. Summary

8.8.1. It is considered that the plan change request is aligned with the strategic objectives of the Otago Regional Land Transport Plan, as relevant to this particular area. The Otago Regional Public Transport Plan is not particularly relevant due to the focus on other areas, but the plan change request is not contrary to it.

8.8.2. The site layout is likely to be able to comply with all the transportation requirements of the District Plan, other than in respect of Part 12.7.1(ii) Sight Distances. However the non-compliance with the sight distance arises due to the proximity of the site to the State Highway 8 / Springvale Road intersection, with the intersection geometry also meaning that vehicle speeds will be reduced in the immediate area, which in turn means that shorter sight distances will be adequate.

8.8.3. In view of the situation, it is not considered that the plan change proposal needs to include any specific transportation-related Rules. Rather, the existing Rules of the District Plan are appropriate, and resource consent applications can be made in the event that the detailed site layout design introduces non-compliances with these.





9. Conclusions

- 9.1. This report has identified, evaluated and assessed the various transportation matters of a private plan change request to rezone a site at Springvale Road to from Rural to Industrial zoning.
- 9.2. Overall it is considered that the traffic generated by the rezoned site can be accommodated on the adjacent roading network without capacity or efficiency issues arising. Modelling of the State Highway 8 / Springvale Road / Hazlett Street intersection shows that under a 'worst case' scenario of all development within the site being light industrial, and all traffic passing through the intersection, delays for vehicles turning right out of the site in the evening peak hour would remain modest with low queues. However, it is more likely that a mix of light and heavy industrial activities would establish, and that a proportion of traffic would travel to/from the east, meaning that delays will be lower.
- 9.3. There is an existing shortfall in the geometry of the State Highway 8 / Springvale Road intersection, as an auxiliary left-turn lane is required under current traffic volumes but one is not provided (although drivers use the existing wider shoulder as a de-facto turning lane). Modelling of the intersection has been based around a left-turn lane (whether formal or informal) being in place. The legal highway here is wide and development within the site would not limit the ability for Waka Kotahi to construct a turning lane.
- 9.4. The legal width of Springvale Road is also substantial and ample for widening the seal as appropriate for the site access.
 - 9.4.1. It is unlikely that development of the site will lead to increased volumes of walking and cycling, as the nature of industrial activities is that they tend to be focussed on movement of goods and materials using motorised vehicles. However in respect of employee travel, approximately 35% of the residential areas of Clyde are within a viable walking distance of the site with all of Clyde being within a 3km distance. The site is therefore well-located for these modes of travel.
- 9.5. The crash history in the vicinity of the site does not indicate that there would be any adverse safety effects from the requested rezoning. New intersections and roads can be constructed to meet current guides and standards, and as such, can be expected to function safely. Sight distances will be appropriate for the prevailing vehicle speeds.
 - 9.5.1. The plan change request is aligned with the strategic objectives of the Otago Regional Land Transport Plan, and the site layout is likely to be able to comply with all the transportation requirements of the District Plan, other than in respect of Part 12.7.1(ii) Sight Distances. However the non-compliance with the sight distance arises due to the proximity of the site to the State Highway 8 / Springvale Road intersection, but this also reduces vehicle speeds and means that shorter sight distances can be supported.
- 9.6. Overall, and subject to the preceding comments, the development facilitated by the plan change request can be supported from a traffic and transportation perspective, and accordingly it is not considered that there are any traffic/transportation reasons why the plan change could not be recommended for approval.

Carriageway Consulting Limited
May 2024



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Peter Dymock

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



27 March 2024

Hartley Road Partnership
c/- Patterson Pitts Group
8 Skird Street
Alexandra 9320

Preliminary Environmental Site Investigation at the Corner of Springvale Road and State Highway 8, Clyde

Our Reference: 24002

1 Introduction

Peter Dymock of Paterson Pitts Group (PPG) requested, on behalf of Hartley Road Partnership, that JKCM Ltd, trading as Insight Engineering (IE), undertake a preliminary environmental site investigation (PSI) of the property at the northern corner of the intersection of Springvale Road and State Highway 8, Clyde (herein referred to as "the site") as outlined in our Short Form Agreement (reference P24002, fully executed on 2 February 2024).

Figure 1 (under Appendix 1) indicates the location of the site, which we understand is proposed to be the subject of a Private Plan Change application to rezone the site from Rural to Industrial. A plan provided by PPG is provided in Appendix 2.

The purpose of this PSI was to assess the suitability of the site for industrial / commercial use, according to the Resource Management (*National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health*) Regulations¹ (herein referred to as the NES). This investigation was undertaken in general accordance with the Ministry for the Environment (MfE) *Contaminated Land Management Guidelines No. 1: Reporting on Contaminated Sites in New Zealand*².

2 Objectives of the Investigation

The objective was to determine if potentially contaminating historical activities pose an unacceptable risk to human health if the land was to be used for industrial or commercial purposes.

2.1 Approach

IE completed the following scope of work to satisfy the investigation objectives:

2.1.1 Review of Site Information

Several sources were contacted for information relating to the sites past and present uses and to identify any other environmental issues which may be on record. This consisted of:

Insight Engineering PO Box 456, Cromwell www.insighteng.co.nz

Preliminary Environmental Site Investigation – Cnr Springvale Road and SH8, Clyde

- Undertaking a walkover inspection of the site, as well as the immediate surrounding area, to describe current conditions and assess whether any visual or olfactory evidence of contamination is present at the site;
- Interviewing the current owner of the property, to obtain information relating to potentially contaminating activities that may have been undertaken at the site and surrounding area;
- Review of publicly available data describing the local geology and hydrogeology;
- Review of the Otago Regional Council Hazardous Activities, Industries and Bore Search database in terms of any property specific records of hazardous activities or industries that are held in their database of potentially contaminated sites;
- Reviewing the Central Otago District Council NES Records Search statement to determine whether any records of contamination at the site are held in their database;
- Reviewing the current and historical Certificates of Title; and
- Reviewing publicly available historical aerial photographs and maps of the site and surrounding area.

3 Site Description

Site information is summarised in Table 1.

Table 1: Site Information

Location	Northern corner of Springvale Road and State Highway 8
Legal Description	Section 1 Block XXXIV Town of Clyde, Part Block XXXIV Town of Clyde, Part Block XXXIII Town of Clyde, Block XXXII Town of Clyde and Part Block XXXI Town of Clyde
Property Ownership	Leon Francis Van Boxtel, Jane Marie Scott, Christine Elizabeth Ramage and Lianneke Mechelina Adriana Lodge
Current Site Use	Firewood production
Proposed Site Use	Industrial / Commercial
Site Area	Approximately 65,901 m ² (6.5901 ha)
Territorial Authorities	Central Otago District Council (CODC) Otago Regional Council (ORC)
Zoning	RU (RR): Rural Resource Area and Rural Residential

The site setting is summarised in Table 2.

Table 2: Site Setting

Topography	The majority of the site is either flat or slopes gently towards the south. The northern and north eastern portion of the site rises moderately to steeply towards the north.
Local Setting	The site is located on the eastern fringe of Clyde. The surrounding area consists generally of disused land (north), a cemetery (east), standard residential (west, beyond SH8) and commercial (south, despite the area being zoned Rural Residential).

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Table 2: Site Setting (cont.)

Nearest Surface Water & Use	The Clutha River / <i>Mata-Au</i> is located approximately 930 m south west of the site. The Clutha River / <i>Mata-Au</i> is used as a source of potable water as well as for recreational, electricity generation and irrigation purposes.
Geology	The GNS New Zealand Geology Webmap ³ indicates that the site is located within the Late Pleistocene river deposits geological unit, described as “ <i>Unweathered to slightly weathered, loose, sandy to silty, well rounded gravel usually on large outwash plains</i> ”. The surface material observed during the site visit is broadly described as light brown sandy, silty gravel.
Hydrogeology	According to a report completed by ORC ⁴ , the site is located within the unconfined Dunstan Flats Aquifer which consists of highly permeable sandy gravel. Groundwater is considered likely to flow towards the south west at a RL of 141 m above mean sea level (amsl), which is approximately 30 m below ground level (bgl).
Groundwater Abstractions ⁵	No groundwater abstraction permits were found to be located within 250 m of the site boundaries.
Discharge Consents ⁵	No current or historical discharge consents have been approved for properties within 250 m of the site.

3.1 Current Site Conditions

Claude Midgley of IE completed a site walkover inspection on 8 February 2024. Observations made at that time are summarised in Table 3 and photographs are presented in Appendix 3.

Table 3: Current Site Conditions

Visible signs of contamination	A small stockpile of treated timber boards and pegs was observed on the eastern side of a caravan located in the north eastern portion of the site. The treated timber covered an area estimated to be less than 10 m ² . Stockpiles of imported soil were observed in the south eastern portion of the site. Two small oil stains were observed in the area near to the caravan and another oil stain was observed in the area where four engine oil containers were stored near to the firewood production area west of the caravan. No other indicators of contamination were evident within the site boundaries.
Surface water appearance	No surface water was present at the time of the site walkover inspection.
Current surrounding land use	Residential, commercial and reserve land surrounds the property.
Local sensitive environments	No sensitive environments are located within 200 m of the site.
Visible signs of plant stress	Apart from evidence of dry, summer conditions, no visible signs of plant stress were noted.

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3.2 Interview with Current Owner

Leon Van Boxtel (*pers. comm.*), owner of the site, provided the following information:

- Mr Van Boxtel's parents, Franciscus and Francisca Van Boxtel, owned the site until he and the other owners inherited the land in 2003.
- Mr Van Boxtel's parents managed a poultry farm that included use of the site until 1980.
- No rabbit control has been undertaken, and no waste has been buried, at the site.
- As far as Mr Van Boxtel is aware, none of the activities undertaken at the site could have resulted in contamination impacts.

3.3 Certificates of Title

Historical Certificates of Title (Appendix 4), provided by PPG, were reviewed by IE. Note that not all text could be deciphered due to the high contrast of the scanned images which resulted in loss of parts of the letters in some words. Ownership records indicate the following:

1872: James Hazlett purchased a property that includes the site. According to The Cyclopedia of New Zealand⁶, Mr Hazlett conducted a large general merchant business in the Otago goldfields between 1863 and 1878, after which he moved to Dunedin to join a Mr Mackerras in the firm of Mackerras and Hazlett (merchants and importers).

1914: Transmission to Bridget Agnes, William Thomas Hazlett and Luke Clyde Hazlett.

1915: Transmission to William Thomas Hazlett and Luke Clyde Hazlett.

1954: Transmission to Luke Clyde Hazlett as survivor.

1964: Transfer to William Lewis Holdom, a carpenter from Clyde.

1964: Transfer to Roy Walker, a farmer from Alexandra.

1965: Transfer to Franciscus Antonius Van Boxtel, a poultry farmer from Clyde and Francisca Martina Van Boxtel, his wife.

1980: Transfer to Francisca Martina Van Boxtel as survivor.

1984: Gazette Notice declaring part of the land (2,005 m²) is acquired for road and shall vest in the Crown.

1995: Transfer to Leon Francis Van Boxtel, a pipelayer from Clyde, Jane Marie Scott, a married woman from Kurow, Christine Elizabeth Ramage, a married woman of Clyde and Lianneke Mechelina Adriana Lodge, a married woman from Christchurch.

3.4 ORC Property Database

IE reviewed the ORC Hazardous Activities, Industries and Bore Search database⁷ on 7 February 2024. The search confirmed that the site is not recorded on the database.

The nearest property recorded on the database is located approximately 275 m south east of the site:

- An orchard at 52 Springvale Road (HAIL.02009.01) is recorded due to the presence of an orchard. The property has not been investigated, but contamination impacts (if any) are not considered likely to have the potential to migrate to the site.

3.5 CODC NES Records Search

The NES Records Search (Appendix 5) completed by Adam Vincent, Planning Officer - Consents, on 14 February 2024. The following information was provided:

- No resource consents are associated with the site.
- Seven building consents were issued between 1958 and 1972 for the construction of a poultry house, two egg rooms with an associated packing and store room, two hen houses, additions to the existing poultry house and a shed.
- Council's aerial photographs, dating back to 2003, indicate the presence of stored timber (2023 photograph).

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The NES Records Search also confirms that no preliminary or detailed site investigations could be found on the property file.

3.6 Review of Historical Aerial Photographs and Maps

Photographs in the Crown Collection⁸ and Google Earth⁹, as well as topomaps on the MapsPast¹⁰ website, have been reviewed to obtain information on the past uses of the site. Aerial photographs taken between 1958 and 2023, as well as maps created between 1929 and 2019, have been reviewed. Table 4 summarises the features visible in each image.

Table 4: Historical Aerial Photographs

1929 ¹⁰	The site, which contains the letter 'E' from the label for Clyde, is located near to the north eastern town belt which is indicated by a dark black line broken intermittently by single black dots. A railway line is located south and west of the site. A creek towards the south east is labelled "Mutton Town Gully". No significant features are visible at the site or in the surrounding area.
1939 ¹⁰	No significant changes are apparent at the site or in the surrounding area.
1949 ¹⁰	The railway line is now depicted with a thick black line. No significant features are visible at the site or in the surrounding area.
1958 ⁸	The site is visible as an undeveloped area between the Clyde Cemetery and the town of Clyde. Springvale Road, which extends unbroken into Clyde, is visible at the southern site boundary. A water race is visible in the norther portion of the site. In the surrounding landscape, the cemetery is visible towards the east. The land on the southern side of Springvale Road appears to be used for growing pasture as linear features likely to represent flood irrigation mounds are visible in that area. There are no other significant features at the site or in the surrounding area.
1966 ⁸	Two rows of poultry shelters are visible at and near to the north western site boundary. The shelters are visible as small square objects and several of them are located on the adjacent land towards the west, which is now State Highway 8. Tracks are visible between the poultry shelters and a large rectangular building located approximately 145 m west of the western site boundary. Linear features resembling flood irrigation mounds have been established across approximately the southern half of the site, however the mounds do not extend into the south eastern corner of the site. No other significant features are visible at the site or in the surrounding area.
1968 ⁸	The poultry shelters have been repositioned so that all but two are located in two rows near to the centre of the site, within the area where flood irrigation mounds are visible. No other significant features are visible at the site or in the surrounding area.
1969 ¹⁰	A water race is marked with a blue line in the northern portion of the site. The blue line includes blue arrows pointing towards the west. The cemetery is labelled towards the east of the site and black squares in the area west of the site indicate the presence of buildings. Springvale Road is marked as 'Hartley Road' and the railway line is visible as a bold black line with intermittent dashes perpendicular to the line. No other significant features are visible at the site or in the surrounding area.
1974 ⁸	The row of poultry shelters has been moved again. This time, the shelters are positioned in one row at the original location of the shelters in the 1966 photograph. Apart from scrub vegetation growing further south of the water race than in the previous photograph, there are no other significant changes at the site or in the surrounding area.

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Table 4: Historical Aerial Photographs (cont.)

1976 ⁸	No significant changes are apparent at the site or in the surrounding area.
1977 ⁸	No significant changes are apparent at the site or in the surrounding area.
1978 ⁸	The row of poultry shelters has been shifted towards the south west and is no longer present on the site. The south eastern corner of the site has been covered with a large, light-coloured stockpile resembling gravel. The neighbouring property towards the south has been cleared of vegetation and covered with a light-coloured material resembling gravel. No other significant changes are apparent at the site or in the surrounding area.
1979 ⁸	The gravel stockpile in the southern eastern corner of the site has halved in size. The neighbouring property at the western boundary (State Highway 8) has been covered with a light-coloured material resembling gravel. Gravel is also visible on the site, extending between 40 and 50 m east of SH8 in the south western two-thirds of the site. Further south of the site, the asphalt-sealed portion of SH8 is visible extending towards the south east. No other significant changes are apparent at the site or in the surrounding area.
1979 ¹⁰	Apart from the realignment of Sunderland Street towards the north east, along the north western site boundary and a new road between the site boundary and the railway line, there only other significant change is a black square which indicates the presence of a building on the southern property.
1981 ⁸	The gravel stockpiles no longer being present on the site. The intersection of Springvale Road and SH8 has been formed and SH8 is completely sealed beneath asphalt. A large rectangular building has been constructed on the neighbouring property towards the south. A railway line with a few train carriages is visible east of the large rectangular building. No other significant changes are apparent at the site or in the surrounding area.
1982 ⁸	No significant changes are apparent at the site or in the surrounding area.
1984 ⁸	A new track has been established between Springvale Road and the south western corner of the site. The track terminates at a light-coloured rectangular area that appears to have been cleared of vegetation. No other significant changes are apparent at the site or in the surrounding area.
1985 ⁸	No significant changes are apparent at the site or in the surrounding area.
1989 ¹⁰	There are no significant changes compared with the 1979 map.
1999 ¹⁰	There are no significant changes compared with the 1989 map.
2005 ⁹	The majority of the site remains undeveloped. The light-coloured rectangular area visible in the 1985 photograph is no longer present. Three soil stockpiles, an unidentifiable narrow rectangular object, a vehicle / caravan and additional smaller unidentifiable objects are visible in the south eastern corner of the site, where the gravel stockpiles had been placed in 1978. New dwellings have been constructed in the area west and south west of the site. No other significant changes are apparent at the site or in the surrounding area.
2007 ⁹	With the exception of a vehicle and two unidentifiable objects in the area south west of the stockpiles, there are no significant changes apparent at the site or in the surrounding area.
2009 ¹⁰	There are no significant changes compared with the 1999 map.

Preliminary Environmental Site Investigation – Cnr Springvale Road and SH8, Clyde

Table 4: Historical Aerial Photographs (cont.)

2010 ⁹	The image is in monochrome. The south eastern portion of the site remains relatively unchanged. A track has been established between the site entrance and the water race in the north western portion of the site. The water race appears to have failed in the area where the track terminates. The lighter-coloured ground surface in that area suggests that reconstruction works may have been undertaken to repair the water race. No other significant changes are apparent at the site or in the surrounding area.
2011 to 2019 ⁹	The south eastern portion of the site becomes progressively more utilised between 2011 and 2019. The area is covered with additional gravel, two orange-brown stockpiles of material resembling sawdust or firewood appear, truck trailers are parked near to the south eastern corner of the site, two caravans are parked near to the north eastern corner of the site. Additional soil stockpiles are placed west of a track that leads from the site entrance to the western portion of the site. By the end of 2019, only one caravan and the soil stockpiles remain. Long dark-coloured linear objects resembling water pipes are visible in the western portion of the site. No other significant changes are apparent at the site or in the surrounding area during this time.
2019 ¹⁰	Apart from Springvale Road being labelled, there are no other significant changes compared with the 2009 map.
2021 ⁹	With the exception of the dark linear objects no longer being located on the site, no significant changes are apparent at the site or in the surrounding area.
2023 ⁹	Several vehicles are visible in the area west of the caravan at the north eastern corner of the site. Several felled trees are visible in stacks further west of the vehicles. The stacks of timber are surrounded by stockpiles of orange-brown material resembling firewood. No other significant features are visible at the site or in the surrounding area.

3.7 Summary of Identified Hazardous Activities and Industries

The following activities noted on the MfE Hazardous Activities and Industries List¹¹ (HAIL) have been identified at the site during review of the site history:

Category A17 – Storage tanks or drums for fuel, chemicals or liquid waste.

- This category is represented by the presence of small (~20L) containers of engine oil stored on site. The risk to health from these sources is considered to be low.

Category A18 – Wood treatment or preservation including the commercial use of anti-sapstain chemicals during milling, or bulk storage of treated timber outside.

- This category is represented by the presence of small stockpile of treated timber posts adjacent to the caravan near to the north eastern corner of the site. The risk to health from this source is considered to be low because of the limited scale of the potentially impacted area and the low likelihood of food to be grown in that area for human consumption.

Category G5 – Waste disposal to land.

- This category is represented by the importation of soil from unknown sources and placement of the soil in stockpiles on the site. The risk to health from these sources is unknown.

Preliminary Environmental Site Investigation – Cnr Springvale Road and SH8, Clyde

According to Regulation 5 of the NES, the Regulations apply if a HAIL activity has been undertaken, or currently is being undertaken on the property.

4 Preliminary Contamination Screening

To ascertain whether any indicators of gross contamination were present at the site, ten soil samples were collected from areas of interest then scanned by E3 Scientific using a calibrated X-Ray Fluorometer (XRF) to estimate the heavy metals concentrations.

XRF works based on the principle of the interaction between X-rays and atoms in a sample. When a material is exposed to X-rays, it undergoes a process called X-ray fluorescence. This process helps identify and quantify the elements present in the sample. The technique is widely used in various fields, including geology, archaeology, environmental science and materials science for non-destructive and rapid elemental analysis of diverse samples.

The accuracy of XRF analysis using a portable machine is generally considered to be quite good, but the level of accuracy can vary depending on several factors including calibration standards, the composition of the sample matrix, sample homogeneity and environmental conditions such as soil moisture.

XRF Survey

The following was undertaken during the XRF survey:

- IE collected samples from the areas of interest at the site (refer to Figure 2) using a new pair of nitrile gloves for each sample. The equipment (hand trowel) was decontaminated using a triple wash procedure with potable water, Decon 90 solution and deionised water between samples. The samples were placed directly into new ziplock bags and labelled with the name corresponding to each individual sample location. The bags were agitated in an attempt to homogenise the samples.
- Samples were delivered to E3 Scientific staff who completed the XRF scans and provided IE with data for a suite of heavy metals (As, Cu, Cr, Pb, Ni and Zn).
- Areas of interest (refer to Figure 2) are summarized as follows: SP (soil stockpile); TT (treated timber storage area); PP1 (poultry pen); NCB (north corner background).

4.1.1 Quality Assurance / Quality Control

The quality assurance / quality control (QA / QC) procedures employed during the works included:

- E3S calibrated the XRF before and after scanning the samples; and
- During the site investigation every attempt was made to ensure that cross contamination did not occur through the use of the procedures outlined within this document.

4.2 Investigation Criteria

4.2.1 Soil Criteria

Human Health Criteria

The investigation criteria referenced in this report have been selected from the NES to assess risks to human health. Where a soil contaminant standard (SCS) was not available, the hierarchy detailed in the MfE *Contaminated Land Management Guidelines No. 2: Hierarchy and Application in New Zealand of Environmental Guideline Values*¹² was used to select applicable criteria.

Preliminary Environmental Site Investigation – Cnr Springvale Road and SH8, Clyde

SCSs, or other appropriate criteria for industrial / commercial land use have been selected considering the proposed end use of the site. Industrial / commercial SCSs were also used to assess the risks to human health during the disturbance of soil associated with excavation activities such as installation / maintenance of underground services and other construction works required as part of the site development.

Ecological Health Criteria

Landcare Research and Hawke's Bay Regional Council produced a report¹³ which updates the database of naturally occurring (referred to as background) concentrations of heavy metals in New Zealand. The database provides a range of expected concentrations of selected heavy metals in New Zealand, accessed online via an interactive map interface. XRF results less than the upper estimates for each of the heavy metals in the database, at the site location, are considered to qualify as 'cleanfill' according to the MfE definition¹⁴. Furthermore, the background concentrations represent criteria that are considered appropriate for the protection of ecological receptors.

4.3 Results

4.3.1 Soil Encountered

Near surface soil encountered across the majority of the site was described as light brown sandy silty gravel.

4.3.2 XRF Survey

Table 5 compares the estimated soil contaminant concentrations in the samples with the adopted investigation criteria described in Section 4.2.1.

Preliminary Environmental Site Investigation – Cnr Springvale Road and SH8, Clyde

Table 5: XRF Estimates Compared with Investigation Criteria

Analyte	Investigation Criteria		Investigation Results									
	Ecological Health Criteria	Human Health Criteria	SP1	SP2	SP3	SP4	SP5	SP6	SP7	TT1	PP1	NCB
Land Use	Predicted Background Concentrations (Cleanfill Criteria) ^A	Industrial / Commercial and Excavation Activities ^B										
Heavy Metals												
Arsenic	5.9	70	<u>9</u>	<u>11</u>	<u>10</u>	<u>10</u>	<u>9</u>	<u>9</u>	<u>15</u>	<u>32</u>	<u>9</u>	4
Chromium ^D	25	6,300	ND	ND	<u>97</u>	ND	ND	ND	ND	ND	ND	<u>60</u>
Copper	23.5	>10,000	ND	ND	ND	ND	ND	ND	10	22	ND	8
Lead	17.2	3,300	<u>23</u>	18	12	8	17	8	9	<u>84</u>	14	16
Nickel	14.3	6,000 ^C	ND	ND	12	ND	13	10	<u>22</u>	ND	14	14
Zinc	62.9	400,000 ^C	58	35	<u>67</u>	54	59	42	<u>70</u>	<u>81</u>	55	36

Notes:

All values in mg/kg.

Bold text indicates concentration exceeds the Industrial / Commercial and Maintenance / Excavation Criterion.

Underlined text indicates concentration exceeds the estimated background concentration.

ND Indicates that the contaminant is not detected within the XRF limits of detection.

- A Determining background soil concentrations of trace elements across New Zealand ¹³.
- B The National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health ¹.
- C Australian National Environmental Protection Council (NEPC) National Environmental Protection (Assessment of Site Contamination) Measure Schedule B(1): Guideline on the investigation levels for soil and groundwater¹⁵. Health Investigation Level: HIL D (commercial / industrial).
- D Criteria for Cr₆ presented as criteria for Cr₃ are non limiting.

Preliminary Environmental Site Investigation – Cnr Springvale Road and SH8, Clyde

5 Discussion

The XRF used in this assessment was used by trained staff and was calibrated before and after scanning the samples. The results are able to be interpreted in a meaningful way, even though laboratory verification of accuracy has not been undertaken during this screening exercise.

The results are considered representative of the contaminant conditions at the various sample locations, but the actual concentrations could be a few mg/kg higher or lower than the XRF estimates.

Given the fact that the SCSs for industrial / commercial land use are significantly higher than the concentrations estimated by the XRF survey, it is considered highly unlikely that the actual soil contamination concentrations exceed the industrial / commercial SCSs.

The XRF estimates are not considered likely to be inaccurate enough to result in actual significant contamination impacts not being detected at the sample locations. However, due to the background concentrations of most of the metals assessed in this investigation being relatively low, it is considered possible that areas with minor contamination impacts (above background, but below industrial / commercial SCSs) may not be detected.

6 Conceptual Site Model

A contamination conceptual site model, presented in Table 6, consists of three primary components to allow the potential for risk to be determined. These are:

- Source of contamination;
- Pathway to allow the contamination to mobilise; and
- Sensitive receptors which may be impacted by the contamination.

Table 6: Conceptual Site Model

Source	Pathway	Receptor
Naturally occurring heavy metals	Inhalation of dust Dermal absorption (direct contact) Ingestion of soil and / or produce grown in the soil	Maintenance / Excavation workers Site workers Current and future residents
Acceptable risk to human health?	<p style="text-align: center;">Earthworks Associated with Land Development and Future Industrial / Commercial use</p> <p>Yes: Visual assessment of the site, as well as XRF screening of soil samples from locations of interest suggest that contamination impacts at the site do not pose a significant risk to human health when developing the site and when undertaking industrial / commercial activities.</p>	

7 Conclusions

Information obtained as part of this investigation (refer to Section 3) indicates that the site has been used for commercial poultry farming (1960s and 1970s), storage of inert construction materials (gravel in the early 1980s) and production of firewood (2010s-2024).

Preliminary Environmental Site Investigation – Cnr Springvale Road and SH8, Clyde

Evidence was found that three HAIL¹¹ activities have occurred within the site boundary, therefore IE undertook preliminary contamination screening by collecting samples from ten areas of interest (refer to Figure 2) and submitting them to E3 Scientific for XRF scanning. The results confirmed that minor contamination impacts have occurred because concentrations of one or more heavy metals (arsenic, chromium, lead, nickel and / or zinc) marginally exceed the naturally occurring concentrations in all samples. As a result, soil from the site cannot qualify for use as cleanfill.

None of the heavy metals assessed in this investigation were found at concentrations near to the industrial / commercial SCSs. The XRF data is considered to be appropriate to demonstrate that the site is highly unlikely to contain contamination impacts that pose a significant risk to human health when undertaking industrial / commercial activities, as well as when excavating soil at the site.

Based on the current contamination status of the site, given the potential sources identified, it is considered highly unlikely that there will be a risk to human health if the Zone was changed to industrial / commercial.

Furthermore, given the following factors, the risk to ecological receptors is considered negligible:

- Marginal contamination impacts (slightly above natural concentrations);
- The significant depth of groundwater at the site (approximately 30 m bgl); and
- The lack of a significant surface watercourse within 200 m of the site.

8 Recommendations

It is recommended that the application to rezone the site for industrial / commercial use be approved because no contamination impacts exceeding the industrial / commercial SCSs have been discovered in the ten areas of interest identified during the site history and site walkover assessments.

Advice from ORC confirms that their Consent required for soil disturbance at a site where the contaminant concentrations exceed the naturally occurring levels and also pose an immediate or long-term hazard to the environment. As the risks to the environment were considered to be negligible at this site, soil disturbance at the site does not meet the criteria to require Consent under Rule 5.6.1 of the Regional Plan Waste¹⁶

9 References

1. Ministry for the Environment 2012: Users' Guide National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health
2. Ministry for the Environment 2021: Contaminated Land Management Guidelines No.1: Reporting on Contaminated Sites in New Zealand
3. GNS Webmap Institute of Geological and Nuclear Sciences 2013: 1:250,000 Geology. Viewed at: <http://data.gns.cri.nz/geology/>
4. Otago Regional Council 2012: Alexandra Groundwater Basin Allocation Study.
5. Otago Regional Council 2024: Otago Regional Council Resource Consent Database. Viewed at: <http://data.orc.govt.nz/>
6. The Cyclopedia of New Zealand 2024: Mr James Hazlett. Viewed at: <https://nzetc.victoria.ac.nz/tm/scholarly/tei-Cyc04Cycl-t1-body1-d2-d17-d19.html>
7. Otago Regional Council 2024: Otago Regional Council – Mapping Resource. Hazardous Activities, Industries and Bores Search. Viewed at: <https://maps.orc.govt.nz/portal/apps/MapSeries/index.html?appid=052ba04547d74dc4bf070e8d97fd6819>

Preliminary Environmental Site Investigation – Cnr Springvale Road and SH8, Clyde

8. Local Government Geospatial Alliance 2024: Retrolens - Historical Image Resource Project. Viewed at: <http://retrolens.nz>
9. Google Earth v7.3.6.9796. Clyde, Central Otago, New Zealand. -45.192551° lon, 169.335855° lat, Eye alt 477 m. Airbus 2024. <http://www.earth.google.com>. [March 2024]
10. Mapspast 2024: Current and Historical Topographic Maps (Topomaps) of New Zealand. Viewed at: <http://www.mapspast.org.nz/>
11. Ministry for the Environment 2011: Ministry for the Environment Hazardous Activities and Industries List
12. Ministry for the Environment 2011: Contaminated Land Management Guidelines No.2 - Hierarchy and Application in New Zealand of Environmental Guideline Values.
13. Landcare Research New Zealand Limited and Hawke's Bay Regional Council 2023: Determining background soil concentrations of trace elements across New Zealand.
14. Ministry for the Environment 2002: A Guide to the Management of Cleanfills.
15. Australian National Environmental Protection Council 2013: National Environmental Protection (Assessment of Site Contamination) Measure Schedule B(1): Guideline on the investigation levels for soil and groundwater.

10 Limitations

- i. We have prepared this report in accordance with the brief as provided. This report has been prepared for the use of our client, Hartley Road Partnership, their professional advisers and the relevant Territorial Authorities in relation to the specified project brief described in this report. No liability is accepted for the use of any part of the report for any other purpose or by any other person or entity.
- ii. The recommendations in this report are based on the ground conditions indicated from published sources, site assessments and subsurface investigations described in this report based on accepted normal methods of site investigations. Only a limited amount of information has been collected to meet the specific financial and technical requirements of the client's brief and this report does not purport to completely describe all the site characteristics and properties. The nature and continuity of the ground between test locations has been inferred using experience and judgement and it should be appreciated that actual conditions could vary from the assumed model.
- iii. Subsurface conditions relevant to construction works should be assessed by contractors who can make their own interpretation of the factual data provided. They should perform any additional tests as necessary for their own purposes.
- iv. This Limitation should be read in conjunction with the IPENZ/ACENZ Standard Terms of Engagement.
- v. This report is not to be reproduced either wholly or in part without our prior written permission.

Preliminary Environmental Site Investigation – Cnr Springvale Road and SH8, Clyde

We trust that this information meets your current requirements. Please do not hesitate to contact the undersigned on 021 556 549 if you require any further information. The author is a Certified Environmental Practitioner (CEnvP) under the Environment Institute of Australia and New Zealand (EIANZ) accreditation system.

Report prepared by



Claude Midgley, CEnvP

Associate Environmental Scientist




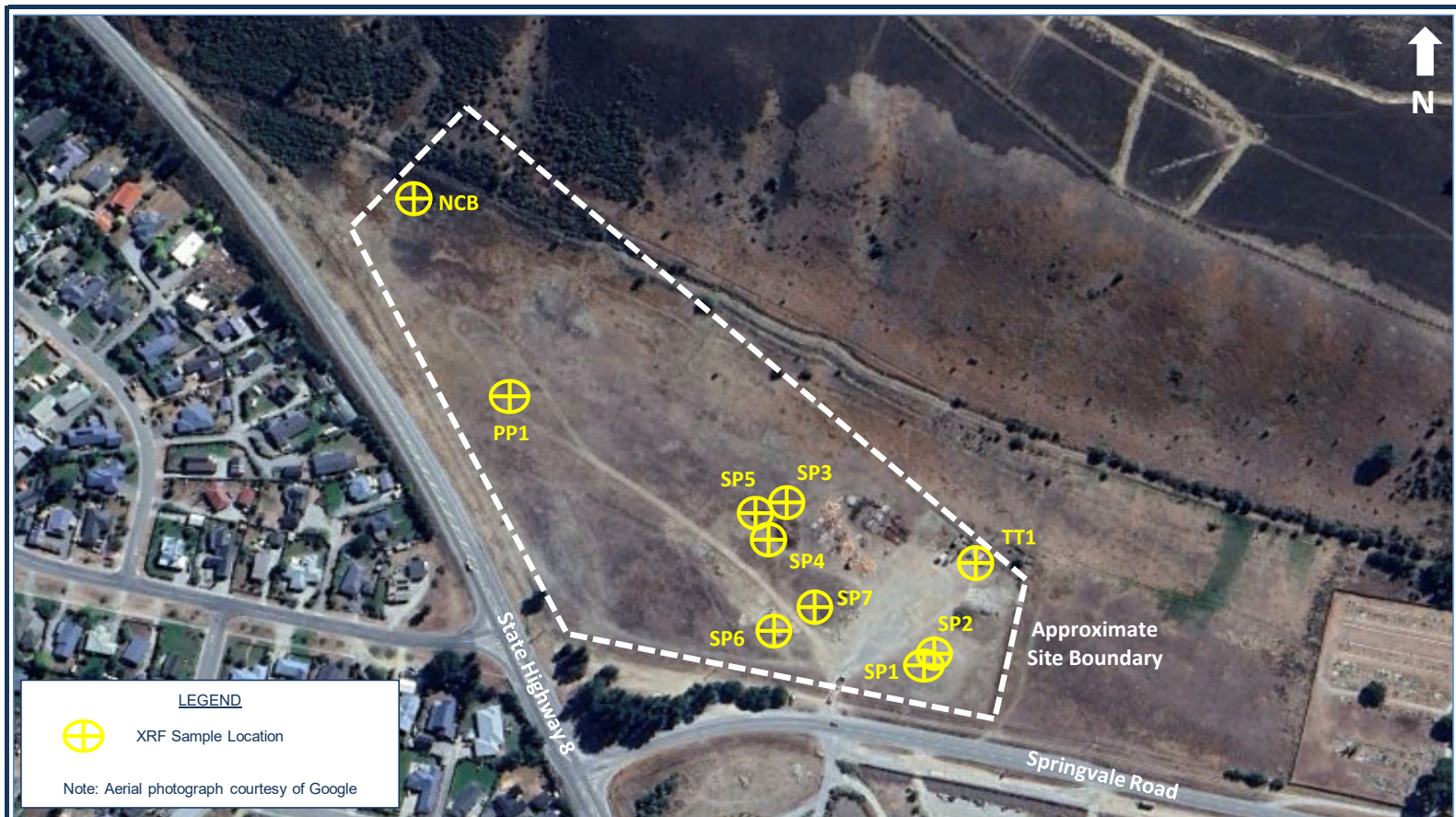
Preliminary Environmental Site Investigation – Cnr Springvale Road and SH8, Clyde


APPENDIX 1

Figures



Description	Site Location Plan	Figure Number	1	
Project	Preliminary Environmental Site Investigation at the Corner of Springvale Road and State Highway 8, Clyde	Date	Mar-24	
Client	Hartley Road Partnership	Drawn by	CM	
Project Number	24002	Approved by	JK	

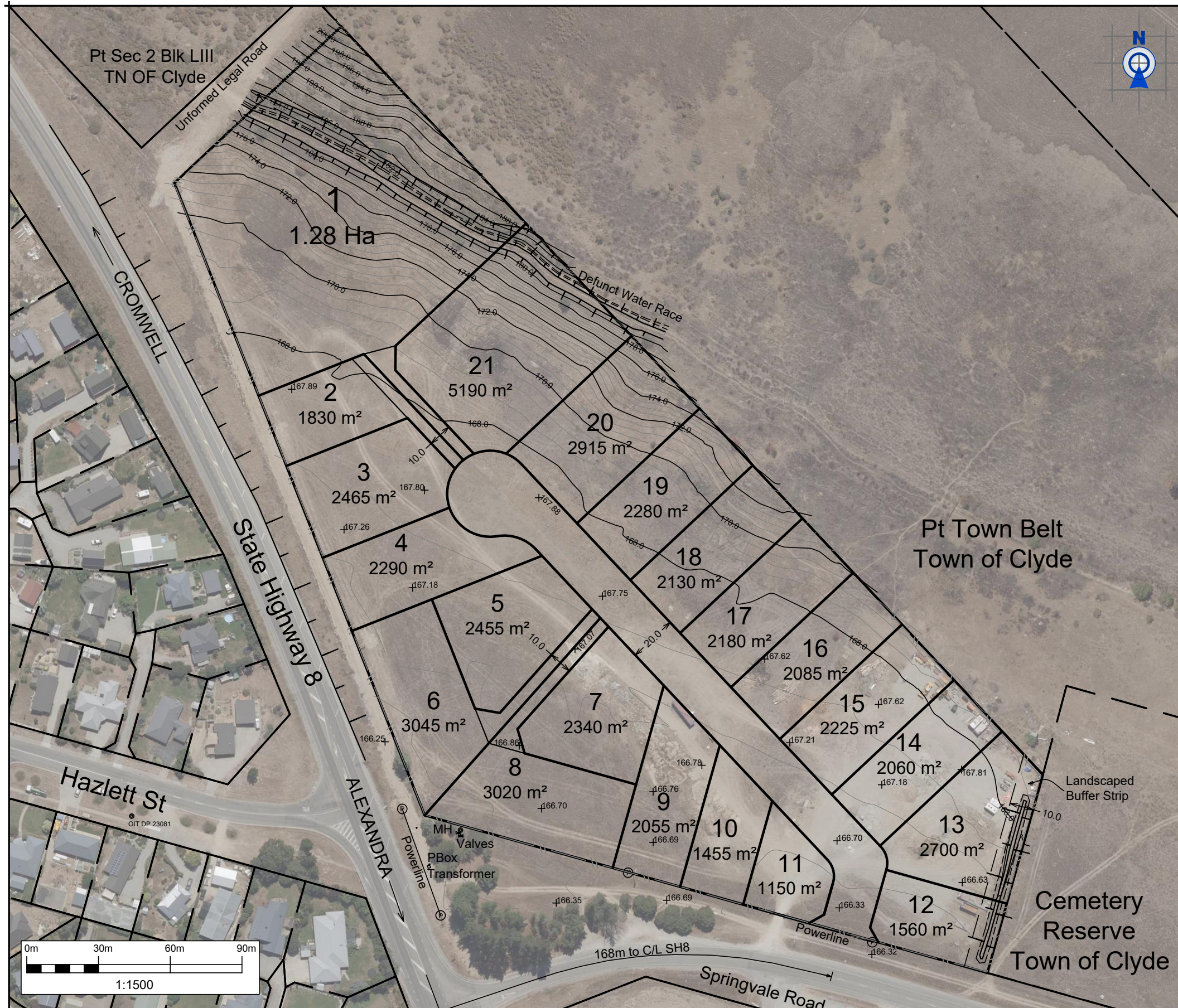


Description	Sample Location Plan	Figure Number	2	
Project	Preliminary Environmental Site Investigation at the Corner of Springvale Road and State Highway 8, Clyde	Date	Mar-24	
Client	Hartley Road Partnership	Drawn by	CM	
Project Number	24002	Approved by	JK	

Preliminary Environmental Site Investigation – Cnr Springvale Road and SH8, Clyde

APPENDIX 2

Proposed Private Plan Change Area



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

Note!
No direct access to SH8 or Springvale Road for any lot.

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Client & Location:
Hartley Road Partnership

Purpose & Drawing Title:
CONCEPT PLAN

FOR INFORMATION

Surveyed by:	BD	Original Size:	Scale:
Designed by:		A3	1:1500
Drawn by:	KWG		
Checked by:	PD		
Approved by:	PD		DO NOT SCALE
Job No:	Drawing No:	Sheet No:	Revision No: Date:
A5202	PLAN	1	A 29/01/2024

Preliminary Environmental Site Investigation – Cnr Springvale Road and SH8, Clyde

APPENDIX 3

Site Photographs



Photo 1: Site viewed from the entrance in the south east, facing north



Photo 2: Treated timber stored near to the caravan in the north eastern portion of the site.



Photo 3: Treated timber stored near to the caravan.



Photo 4: Treated timber stored near to the caravan.

Description	Site Photographs	Photos	1 to 4	
Project	Preliminary Environmental Site Investigation at the Corner of Springvale Road and State Highway 8, Clyde	Date Taken	8/2/24	
Client	Hartley Road Partnership	Taken by	CM	
Project Number	24002	Approved by	JK	



Photo 5: Sample SP1, viewed from the north west facing south east.



Photo 6: Sample SP2, viewed from the south east facing north west.



Photo 7: Caravan and firewood production area, viewed from the east facing north west.



Photo 8: Minor surface soil stains near to the caravan.



Photo 9: Firewood production area west of the caravan.



Photo 10: Engine oil containers and minor staining of the surrounding soil.


Description	Site Photographs	Photos	5 to 10	
Project	Preliminary Environmental Site Investigation at the Corner of Springvale Road and State Highway 8, Clyde	Date Taken	8/2/24	
Client	Hartley Road Partnership	Taken by	CM	
Project Number	24002	Approved by	JK	



Photo 11: Site viewed from the north west facing south east.



Photo 12: Inert construction materials stored in the eastern portion of the site.



Photo 13: Sample location PP1, viewed from the north facing south.



Photo 14: Sample location NCB, viewed from the north facing south.

Description	Site Photographs	Photos	11 to 14	
Project	Preliminary Environmental Site Investigation at the Corner of Springvale Road and State Highway 8, Clyde	Date Taken	8/2/24	
Client	Hartley Road Partnership	Taken by	CM	
Project Number	24002	Approved by	JK	

Preliminary Environmental Site Investigation – Cnr Springvale Road and SH8, Clyde

APPENDIX 4

Historical Certificates of Title

CANCELLED

NEW ZEALAND.

(C) **CERTIFICATE OF TITLE.**

Register Book,
Vol. 2 Folio 366

2/366

Application No. 493.

James Haylett of the Town of Clyde in the Province of Otago and Colony of New Zealand Merchant is now seized in full in the several parcels mentioned in the enclosed plan in that piece of land situated in the Town of Clyde and contained by measurement hereinafter and by (A) plan more or less as the same is delineated on the plan drawn at the foot hereof with all the rights and appurtenances thereto belonging which said piece of land in the town aforesaid marked Block Thirty one (XXXI) delineated in the title sheet of the said town and in the office of the Commissioner of Crown Lands at Dunedin originally granted the twenty fifth day of April 1871 under the hand and seal of Sir George Bowen Mayor & C. of New Zealand to John Cox of Clyde and his heirs forever.

IN WITNESS whereof I have hereunto set my hand and official seal at this fourth day of March one thousand eight hundred and seventy two

Signed in the presence of
W. Smith
 the 20 day of March 1872

W. Smith
 District Land Registrar
 of the District of Otago

Transmission No. 7500 to Bryant Agnes Haylett, William Thomas Haylett and Luke Clyde Haylett entered 9th July 1914 at 12.15.00

Transmission No. 7968 to William Thomas Haylett and Luke Clyde Haylett entered 30th September 1915 at 11.00.00

Transmission No. 4774 to Luke Clyde Haylett as survivor entered 31st August 1954 at 10.12.00

Transfer 170076 Luke Clyde Haylett to Brian Herbert Schmitz produced Grant August 1954 at 10.13.00

Mortgage 156637 Brian Herbert Schmitz to Luke Clyde Haylett August 1954 at 10.20.00

238040 Transmission of Mortgage 156637 to P. J. P. & Co. Ltd. and General Company of New Zealand Limited as Assignees entered 19.9.1961 at 2.22.00

272681 Transfer to William Lewis Nelson of Clyde, Carpenter - 9.1.1962 at 2.7pm

273453 Transfer to Clarence Roy Walker of Clarendon Farmer - 10.7.1964 at 9.55 AM

271103 Impression of seal placed on section 13 of the Public Works Amendment Act 1960 entered 30.9.1964 at 10.00

DISCHARGED

DISCHARGED

Town of Clyde

Scale 2 Chains = 1 inch

EQUIVALENT METRIC AREA IS
 8347 m²
 2005 m²
 6342 m²

C.T. 2/366

287842 Transfer to Francisus Antonius Van Boxtel of Clyde Poultry Farmer and Francisus Martina Van Boxtel his wife - 1.7.1985 at 11.5 am

2/366

287843 Mortgage to ~~Francisus Antonius Van Boxtel~~ ^{Francisus Antonius Van Boxtel} - 1.7.1985 at 11.10 am

875902/3 Transfer of the part Lot 12 DP 24206 herein to Leon Francis Van Boxtel of Clyde Pipelayer, Jane Marie Scott of Kurow Married Woman Christine Elizabeth Ramage of Clyde Married Woman and Lianneke Mechelina Adriana Lodge of Christchurch Married Woman - 16.2.1995 at 9.22am

314632 Mortgage to Bank of New Zealand - 30-5-1967 at 2.34 pm

DISCHARGED

A.L.R.

THIS REPRODUCTION (ON A REDUCED SCALE) CERTIFIED TO BE A TRUE COPY OF THE ORIGINAL REGISTER FOR THE PURPOSES OF SECTION 215A LAND TRANSFER ACT 1952.

J. McBurney A.L.R.

SAC

Pursuant to Section 238 (1) (a) Resource Management Act 1991 the part Lot 13 DP 24206 herein is vested in the Central Otago District Council as road

A.L.R.

483128 Proclamation defining the middle line of a portion of State Highway (Timaru-Milton) entered 15.8.1977 at 9.39 am (affects part).

J. McBurney A.L.R.

875902/15) New CT 16B/204 issued for the part Lot 12 DP 24206 herein

A.L.R.

875902/20) Cancelled and new CT 16B/208 issued for the balance herein

16.2.1995

491480 Compensation Certificate pursuant to Section 176 of the Public Works Amendment Act 1978 entered 10.2.1978 at 11.46 am

DISCHARGED

J. McBurney A.L.R.

540558 Transmission to Francisca Martina Van Boxtel as survivor entered 27.8.1980 at 1.53 pm

J. McBurney A.L.R.

610067 Gazette Notice declaring part of the within land (2005m²) shown hatched black on the diagram hereon is acquired for road and shall vest in the Crown on 9 February 1984 - 20.2.1984 at 2.02 pm

J. McBurney A.L.R.

627969 Gazette Notice hereby declaring that part of State Highway No 8 (Timaru to Milton via Cromwell) adjoining the within Land to be a Limited Access Road - 20.12.1984 at 11.53 am. (pages 3 + 5)

J. McBurney A.L.R.

LSP 21.12.1984

875902/2 Discharge of Mortgage 314632 as to Part Lots 12 and 13 DP 24206 herein - 16.2.1995 at 9.22am

J. McBurney A.L.R.

DUPLICATE DESTROYED
16/2/1995

DISTRICT LAND REGISTRAR
Cancelled
OTAGO NEW ZEALAND



Preliminary Environmental Site Investigation – Cnr Springvale Road and SH8, Clyde

APPENDIX 5

CODC NES Records Search



NES RECORD SEARCH

Application

JKCM Limited PO Box 456, Cromwell 9342	Number Application date Phone Mobile Email claude@insighteng.co.nz	NES240004 9/02/24
---	---	----------------------

Property

Valuation No.	2846140100
Location	Springvale Road, Springvale
Legal Description	Section 1 Block XXXIV Town of Clyde, Part Block XXXIV Town of Clyde, Part Block XXXIII Town of Clyde, Block XXXII Town of Clyde and Part Block XXXI Town of Clyde
Area (hectares)	6.5901

Resource consents

Resource Area: Rural Resource Area
Consents: <i>No information in relation to the above could be found on this record.</i>

Building

Consents/Permits/Compliance Schedules:	
28/09/1972	Building Permit 3225: Erect a new shed <i>No information in relation to HAIL activities could be found on this record.</i>
23/07/1962	Building Permit 1538: Erect a new hen-house <i>No information in relation to HAIL activities could be found on this record.</i>
23/07/1962	Building Permit 1540: Erect a new egg room <i>No information in relation to HAIL activities could be found on this record.</i>
02/11/1961	Building Permit 1461: Additions to existing poultry house <i>No information in relation to HAIL activities could be found on this record.</i>
08/01/1961	Building Permit 1477: Erect a new hen house <i>No information in relation to HAIL activities could be found on this record.</i>
22/04/1960	Building Permit 1188: Erect a new egg room, packing and store room <i>No information in relation to HAIL activities could be found on this record.</i>
05/05/1958	Building Permit 851: Erect a new poultry house <i>No information in relation to HAIL activities could be found on this record.</i>

Preliminary Site Investigations and Detailed Site Investigations

<i>No information in relation to the above could be found on this record.</i>

Aerial Photographs

Council's aerial photographs for the site date back to 2003. Aerial photographs indicate the presence of areas of stored timber. The bulk outdoor storage of treated timber is Item A18 on the HAIL and may trigger NES-CS requirements if undertaken on the site.



Figure One: Outdoor timber storage (Source: CODC Aerial Photographs dated 2023)

Other Land Features

No information in relation to the above could be found on this record.

Disclaimer: The Council does not hold records directly relating to activities on the Hazardous Activities and Industries List (HAIL). In the event some information is available it cannot be guaranteed as correct or complete and therefore may not satisfy your request. We therefore recommend you undertake further investigation to determine whether any HAIL activities exist on the site.

Prepared by

Adam Vincent
Planning Officer - Consents
Date: 14 February 2024

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HARTLEY ROAD PARTNERSHIP PLAN CHANGE APPLICATION

INFRASTRUCTURE REPORT

PROJECT: Clyde Industrial Park
PRINCIPAL: Hartley Road Partnership
OUR REF: A5202
DATE: October 2024

DUNEDIN:P.O. Box 5933,
Dunedin 9058.
T 03 477 3245**CHRISTCHURCH:**P.O. Box 160094,
Christchurch 8441.
T 03 928 1533**ALEXANDRA:**P.O. Box 103,
Alexandra 9340.
T 03 448 8775**CROMWELL:**P.O. Box 84,
Cromwell 9342.
T 03 445 1826**QUEENSTOWN:**P.O. Box 2645,
Queenstown 9349.
T 03 441 4715**WANAKA:**P.O. Box 283,
Wanaka 9305.
T 03 443 0110

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REVISION / APPROVAL PANEL

Rev:	Date:	Prepared By:	Reviewed By:	Comments:
0	20 May 2024	MG	SW & PLD	Initial
1	28 May 2024			Final
2	1 October 2024	PLD		Updated

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Cromwell 9342
Telephone: +64 3 445 1826
Email: cromwell@ppgroup.co.nz
Web: www.ppgroup.co.nz

Job No: A5202
Date: October 2024
Report Prepared for: Hartley Road Partnership

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1. Scope

Paterson Pitts Limited Partnership (PPLP) has been engaged by the Hartley Road Partnership to provide an infrastructure report to support an application for a private Industrial plan change at Springvale Road and SH8, Clyde, comprised in Record of Title 51710, being 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.

This report covers the availability of the following infrastructure elements.

- (a) Wastewater
- (b) Stormwater
- (c) Water Supply – Potable, Firefighting and Irrigation
- (d) Network Utility Services (electricity and telecommunications)
- (e) Road Construction and Earthworks

It addresses erosion and sediment control measures and on-site management of construction activity including dust.

Investigations have been carried out, including test pits and soakage tests.

2. Executive Summary

2.1 Stormwater

The site is underlain by a considerable depth of glacial out wash gravels, with depth to groundwater in excess of 36 metres below ground level. Soakage tests have shown these gravels to vary between medium to very highly permeable. No issues are anticipated with the discharge of stormwater from roading, hard stand and roof run off direct to ground via suitably designed soak pits, as is the norm for all recent land development within the area. Similarly, new sites can discharge stormwater to ground soakage.

2.2 Wastewater

The District Council has recently installed a new wastewater reticulation network in the Clyde area. At a meeting with Julie Muir and Ann Rogers from Council on the 1st Feb 2024, Council's officers indicated that a connection to the Clyde reticulation was possible but that issues with the capacity of the Alexandra Wastewater Treatment Plant to serve the site would need to be resolved .

A preliminary plan showing one option for this connection is attached as **Appendix 3**. It is acknowledged that specific connections to Council's network , location of pumpstations etc are matters for consideration at the time of subdivision .

2.3 Water Supply

The District Council has recently installed a new water reticulation network for the Clyde and Alexandra townships. The preliminary plan at **Appendix 3** shows one option for connection to the network, subject to consideration at the time of subdivision.

2.4 Network Utility Services

Chorus New Zealand Ltd have confirmed that a suitable telecommunications (fibre) supply can be made available to the proposed development of the site.

Aurora Energy has advised that a suitable power supply can be made available to serve the proposed development of the site.

All power and telecommunication services are to be located underground. There will be no overhead cabling.

2.5 Road Construction & Earthworks

All roads will be constructed on sand and gravels, with some small pockets of silt that may require a subgrade improvement layer. Reported bearing capacity tests on likely road subgrades were well in excess of the minimum requirement (CBR >7). No issues are expected with designing and constructing road pavements in compliance with the procedures of "Austroads" and the subdivisional pavement design standards of the Central Otago District Council. Road typology designs and geometry are anticipated to be in accordance with "Austroads" and NZS 4404:2004. No significant bulk earthworks are required to develop the site and there is no possibility of any discharge of sediment from the site.

3. Stormwater

There is no reticulated stormwater system available that would ultimately have to discharge into the Clutha (Mata Au) River to service this development and, even if there was, this form of stormwater management is no longer considered to be best practice.

The bore log for the site shows that the site is underlain by a considerable depth of glacial outwash sand and gravel with depth to groundwater in excess of 36 metres below the ground surface. Test pitting by Paterson Pitts shows near surface topology to be minimal topsoil over outwash sands and gravel, down to the depth of all test pits.

A location plan, test pit logs and the bore log are attached in **Appendix 1**.

Soakage tests were carried out on 3 of the test pits. Infiltration rates of 1163mm/hr to 3100mm/hr were recorded. This equates to soakage rates for a typical "Cauldwell" type soak pit of 0.24L/s to 0.82L/s.

The NIWA HIRDS program was used to calculate a 2% Annual Exceeding Probability (AEP) short duration rainfall event of 83.3 mm/hr using a 4.5 deg temperature risk factor to allow for climate change. This resulted in a runoff of 0.0208L/s/m² to cater for.

Council’s engineering standards require a pair of road drainage sumps at a maximum spacing of 90m. This equates to a soakage rate requirement of 18.76L/s for each soak pit, draining a 13m wide road carriageway. Soakage tests, infiltration calculations and rainfall intensity calculations are attached in **Appendix 2**.

Direct discharge to ground for stormwater from roading, impermeable surfaces and roof run-off will therefore be possible. The standard solution acceptable to Council is a “Cauldwell type” soak pit, one per sump outlet. This method of stormwater disposal is universally used for land development over glacial outwash gravels in Cromwell, Alexandra and Clyde. See Fig 1.

The Central Otago District Council, in its addendum to NZS4404:2004; July 2008 which is the current Engineering standard adopted by the council for land development, adds to Clause 4.3.8.2 Soakpits:

“A standard ‘Cauldwell’ type soakpit in accordance with Appendix 2 (which is the Cauldwell Soakpit Detail – see Fig 1) of the Addendum shall be required for each separate sump.”

And

“Silt traps shall be installed in the stormwater system prior to discharge to any soakpit.”

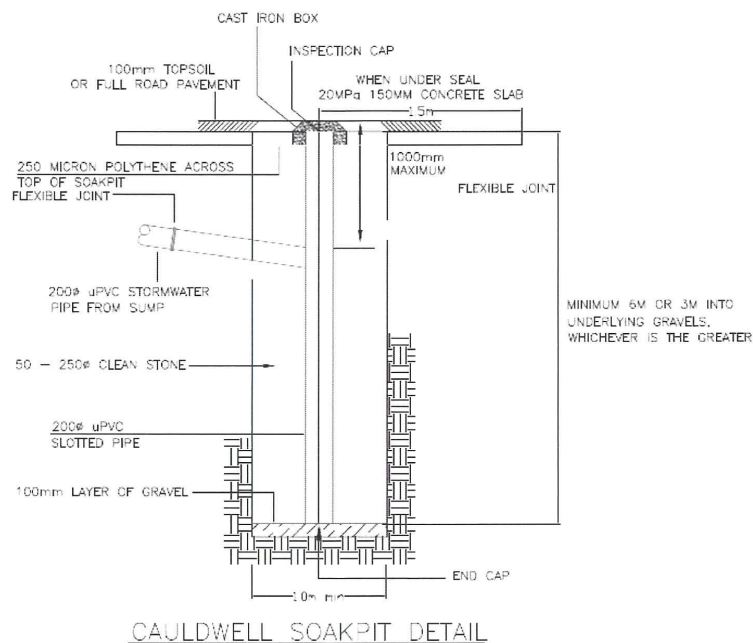
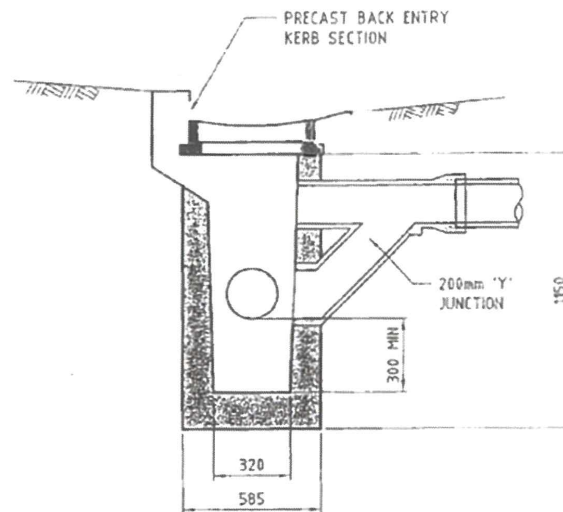


Fig 1

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In order to comply with the Regional Water Plan rules, a silt and debris trap is required before discharge of stormwater to a soak pit. This will be provided by an “inverted syphon” type mud tank. See Fig 2.



TYPICAL SUMP DETAIL

Fig 2

The Otago Regional Council’s Regional Plan: Water for Otago, provides for the discharge of stormwater into land as being a permitted activity. The ORC has always accepted the use of Cauldwell type soakpits, in conjunction with a silt trap provided by an inverted syphon type mud tank (Typical Sump Detail – see Fig 2), to satisfy these requirements.

Regional Plan: Water:

Rule 12.B.1.9

*“The discharge of stormwater from any road not connected to a reticulated stormwater system to water, or onto or into land, is a **permitted** activity, providing:*

- (a) The discharge does not cause flooding of any other person’s property, erosion, land instability, sedimentation, or property damage; and*
- (b) Where the road is subject to works, provision is made for the interception of any contaminant to avoid, after reasonable mixing, the following effects in the receiving water:*
 - i) The production of any conspicuous oil or grease films, scums, or foams, or floatable or suspended materials; or*
 - ii) Any conspicuous change in the colour or visual clarity; or*
 - iii) Any emission of objectionable odour; or*
 - iv) The rendering of fresh water unsuitable for consumption by farm animals; or*
 - v) Any significant adverse effects on aquatic life.”*

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This stormwater management approach proposed for the development meets these requirements:

- Ground soakage testing demonstrates there will be no surface flooding.
- There are no overland flow paths that would create the risk of erosion.
- The inverted siphon mud tank/Caudwell soak pit system will remove any contaminants, grease scum or floatable / suspended materials.
- The discharge direct to groundwater means there is no impact on aquatic life or risk to humans or animals.

There is a depth of at least 20m of gravel and sand below each soak pit, which will further filter stormwater before it is eventually discharged to groundwater. The inverted siphon mud tank/Caudwell soak pit system effectively provides for 3 stage treatment of stormwater. The mud tank (which is periodically sucked out by Council) removes silt, trash and gross pollutants, while the Caudwell soak pit (also periodically sucked out by Council) provides secondary treatment by removing finer silt and debris, with the 9m of sand and gravel below the soak pit providing tertiary filtration.

For roof run off, Council has a “rule of thumb” that 1m³ of soak pit volume is required for every 50m² of roof area draining into a soak pit.

As per the Geosolve Geotechnical report, it is proposed to retain and utilise the now defunct water race cutting across the slope above the site to divert overland flows away from the development, as is already occurring.

The developable area of the site is relatively flat. This means there will be a lack of secondary flow paths. From a stormwater/road design aspect this means that most roads will need to be cut into the surrounding terrain by a least 150-300 mm, in order to provide longitudinal road drainage. This also allows for a conservative approach for the industrial buildings to be treated similar to dwellings by providing compliance with Building Code requirements (E1/AS1) for minimum floor levels above the road crown. See Fig 3

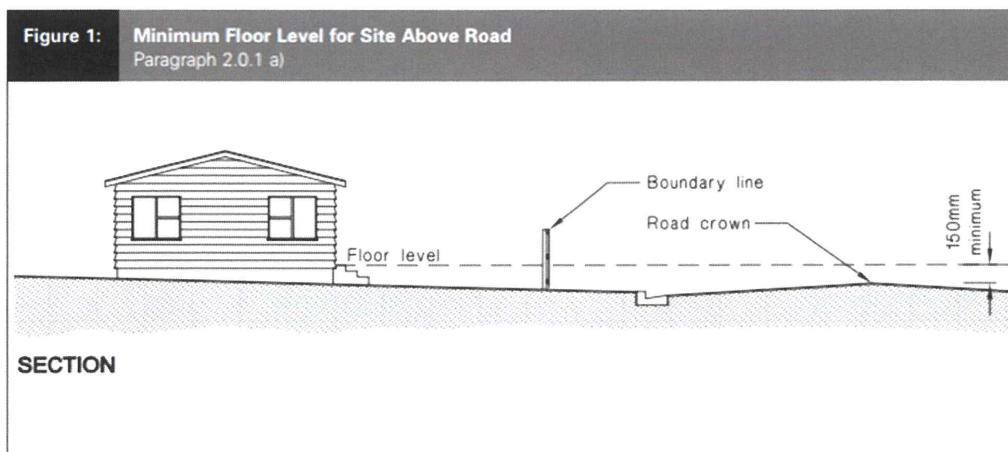


Figure 3

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Essentially the roads act as temporary overflow ponding areas in the event of exceptional rain events and/or occasional blockage of mud tanks.

Stormwater management on individual sites is addressed at building consent stage. Our analysis has demonstrated that all sites will be able to deal with stormwater from commercial buildings by way of ground soakage.

Stormwater from a SH8 side channel discharges into a 10m wide x 200m long formed swale between the toe of the SH8 batter and the site boundary fence. Given the very high permeability of the outwash gravels underlying the swale, 2000m² of dispersal field is more than adequate for a 1% AEP rain event without any discharge of state highway stormwater onto the site itself.

In conclusion:

- (a) All stormwater can be managed on site through ground soakage.
- (b) Ground soakage is the best practice method of managing stormwater on this site.
- (c) Appropriate treatment devices are put in place for road stormwater catchpits.
- (d) Soakage will follow the standard CODC method and engineering standards.
- (e) No district consents are required.
- (f) Managed in the way proposed, the stormwater effects of this development will be less than minor.
- (g) This method of stormwater discharge does not trigger any regional consents under the Regional Plan: Water.

4. Wastewater

The most likely option for the location of a sewer pumping station to service the development as well as potential further development along Springvale Road is shown on the preliminary plan at **Appendix 3**.

The specific location of the sewer pump station and route of the pumping main are to be determined at the detailed engineering design and approval stage under NZS 4404:2004 (Council's Subdivision and Land Development Code of Practice).

The pump station will be designed in accordance with Section 5.3.10 of CODC's addendum to NZS4404:2204, dated July 2008. This requires 24 hours of average dry weather flow.

5. Water Supply

5.1 Irrigation

From the Otago Regional Council's "grow Otago" data base:

- (a) "Dry summer rainfall" is 81-100mm for Clyde
- (b) "Median potential evapotranspiration" (Jan-Feb) is 231-235mm

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Irrigation would therefore be essential to establish and maintain all public and private landscaping within the development. This is particularly so given the very low Plant Available Water (PAW) of the site, due to its light sandy/gravelly soils.

The Council's preferred option is that public space irrigation be supplied from a bore, rather than the town reticulation.

An attempt to establish a bore on the site in 1999 failed, therefore there is no possibility of using bore water for public space irrigation. However, no public space is proposed or required for an industrial subdivision.

5.2 Industrial and Firefighting

The recently constructed trunk main servicing Alexandra runs along the SH8 boundary of the site and it is proposed to connect into this with a suitably sized main to serve the proposed development as well as providing for its extension along Springvale and Dunstan Roads to land re-zoned under Plan Change 19.

This connection is subject to the detailed engineering design and approval stage under NZS 4404:2004. A likely alignment is shown on the attached **Appendix 3** plans. A supply to SNZ PAS 4509:2008 FW3 Standard for the industrial development is possible with this proposed connection.

6. Network Utility Services

6.1 Telecommunications

Chorus New Zealand Ltd have confirmed that a suitable fibre reticulation can be supplied to the proposed development. See **Appendix 6**.

Individual lot owners will also have the alternative option of the cellular network and several wi-fi providers for their telecommunications and computer media service.

6.2 Electricity

Aurora Energy have confirmed that a suitable power supply can be made available to service development of the site. See **Appendix 6**.

6.3 Underground services

All services are "underground". There is no above ground cabling of power or telecommunications.

7. Road Construction & Earthworks

No difficulty is expected in designing and constructing suitable road pavements within the site, in compliance with "Austroads" and the subdivision engineering pavement design standards of the Central Otago District Council.

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All roads will be formed on sand and gravel with some very small pockets of silt anticipated. Laboratory Soaked California Bearing Ratio (CBR) tests were taken at the likely road subgrade at three of the test pits. See **Appendix 7**. Soaked CBR's varied from CBR 16% – 30%, well above the normal minimum requirement of 7% for road pavement design in terms of the "Austroads" standard. Small pockets of silt are expected to be encountered within the site. These can be dealt with by "bridging" with a subgrade improvement layer of compacted gravel.

Council's current subdivisional roading engineering design standard is NZ 4404:2004 and its July 2008 amendments thereto.

It is proposed that road typologies on any subsequent subdivision and development of the site will be in accordance with this standard.

The proposed typical sections (Roading Typologies) are attached in **Appendix 4** and these, or similar, will be used for the roads servicing all allotments within the development.

The developable area of the site is basically flat, therefore no significant earthworks are anticipated for the development of the site, apart from the normal utility service trenching and roading. There may possibly be very minor areas of shallow fill which will be certified in accordance with NZS 4431:2022 "Earth fill for Residential Development".

All earthworks for industrial development are a permitted activity under the Operative Central Otago District Plan. The detailed design and management of earthworks is managed under the process of NZS 4404:2004.

An earthworks consent for industrial developments is not required from the Otago Regional Council as only earthworks for residential development are subject to the rules of the Regional Plan: Water.

- There will be no discharge of any sediment off the site as that part of the site that will be subject to roading construction is flat and the materials are highly permeable gravel and sand.
- The nearest water body (Clutha / Mata Au River) is 900m from the site and there is no overland flow path to the river.

The principal issue with earthworks on this site (and all other land development sites in Clyde) is the control of dust discharge from the site, not sediment. This will be managed by the application of water, by water cart, and dragline pod spray irrigation.

8. Construction management

Normal 'best practice' construction management measures are put in place. This includes:

- (a) Erosion and sediment control measures. The site benefits from there being no stream or waterways traversing the site. Erosion and sediment control focuses largely on dust mitigation. This is achieved through:
 - undertaking the development in stages and therefore limiting the land area exposed to excavation work at any one time.
 - use of water spray jets and water carts for dust suppression.
 - use of dust suppression agents.

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- construction of a trench adjacent to the northern properties to manage vibration.
- management of truck movements for safety and amenity reasons.

(b) It is anticipated that any subdivision consent will require the development of a “Construction Management Plan” and a “Construction Traffic Management Plan”.

9. Conclusion

Suitable provision can be made for roading, stormwater, wastewater, water supply and network utility services to the proposed development.

Prepared:

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B.Surv_(dist), RPSurv, MS+SNZ, CSNZ

Paterson Pitts Limited Partnership (Cromwell)

Reviewed:

Steve Winter

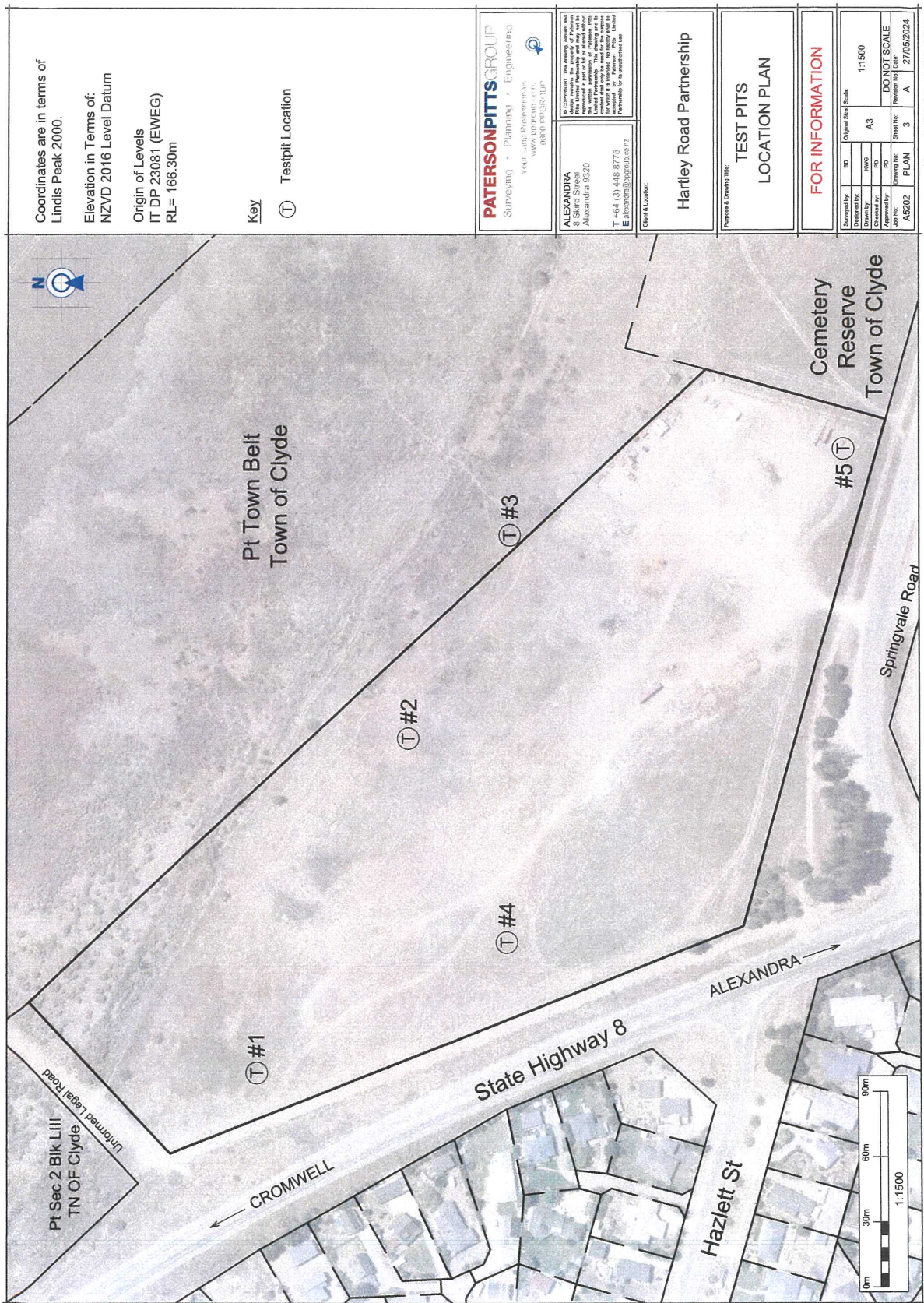
RPSurv, MS+SNZ, CSNZ

Paterson Pitts Limited Partnership (Cromwell, Queenstown)



APPENDIX 1

Location Plan of Test Pits / Test Pit Logs & Bore Log





APPENDIX 2

Soakage Tests, Infiltration Calculations & Rainfall Intensity Calculations

1 of 5 A5202

Hartley Road
Development

Test Pits April 2024

TEST PIT 1

Ground	0.00
Topsoil	-0.1
sandy SILT Dispersements of Small rounded gravels 1mm-5mm	-0.40
Coarse sandy GRAVELS Well graded Angular 5mm-50mm	-0.70
Sandy GRAVEL Poorly graded Rounded Free flowing 5mm - 50mm	-1.40
sandy SILT Fine moist	-1.70
SAND fine	-2.00
sandy GRAVEL Well graded Angular Large rocks ADL 150mm-200mm	-2.30
Coarse sands Poorly graded Angular	-2.6



LOCATION:
LINDIS PEAK 2000 NZTM
mN mE mN mE NAME
749312 389435 4989284 1311952 TP 1

2 of 5 A5202

Hartley Road
Development

Test Pits April 2024

TEST PIT 2

Ground	0.00	
Topsoil	-0.25	
Sandy SILT Compact Dispersements of Small rounded gravels 1mm-5mm	-0.75	
Coarse sandy GRAVELS Well graded Angular 5mm-50mm	-0.90	
Downhill side		Uphill side Fine Silt calcification
Fine sand		Fine-Medium Silty/sand
	-1.40	-1.40
sandy SILT Coarse	-1.50	
sandy GRAVEL Well graded Rounded Free Flowing 10mm 100mm	-2.00	
Coarse Sandy Gravel Poorly graded Angular 5mm-50mm	-2.2	



LOCATION:
LINDIS PEAK 2000 NZTM
mN mE mN mE NAME
749242 389590 4989221 1312110 TP 2

3 of 5 A5202

Hartley Road
Development

Test Pits April 2024

TEST PIT 3

Ground	0.00
Topsoil	
	-0.40
Sandy SILT Dispersements of Small rounded gravels 1mm-5mm	
	-0.60
Coarse Sand	
	-0.90
Grey Sand Well graded Some calcification	
	-1.40
Coarse sand	
	-2.7



LINDIS PEAK 2000		NZTM		NAME
mN	mE	mN	mE	
749195	389684	4989178	1312206	TP 3

4 of 5 A5202

Hartley Road
Development

Test Pits April 2024

TEST PIT 4

Ground	0.00
Topsoil	-0.15
sandy SILT Coarse Compact	-0.40
Fine sand Some rounded gravels 1mm-5mm	-0.65
Coarse Sand Compact	-1.10
Very fine sand	-1.25
Coarse sand Gravel lenses	-1.70
Coarse sandy GRAVELS Well graded, Angular Some Large rocks ALD 50mm-100mm	-1.90
Coarse sandy GRAVELS	-2.6



LOCATION:
LINDIS PEAK 2000 NZTM
mN mE mN mE NAME
749196 389495 4989171 1312017 TP 4

5 of 5 A5202

Hartley Road
Development

Test Pits April 2024

TEST PIT 5

Ground	0.00
Topsoil	-0.1
sandy SILT	
Compact	-0.45
Coarse sand and gravels Free Gravels 1mm-10mm	-0.65
Clean Grey Sand Medium - Coarse	-0.90
Coarse sand Clean Compact Some rocks ALD<150mm	-1.50
Fine sand Clean Compact	-2.7



LOCATION:
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APPENDIX 3

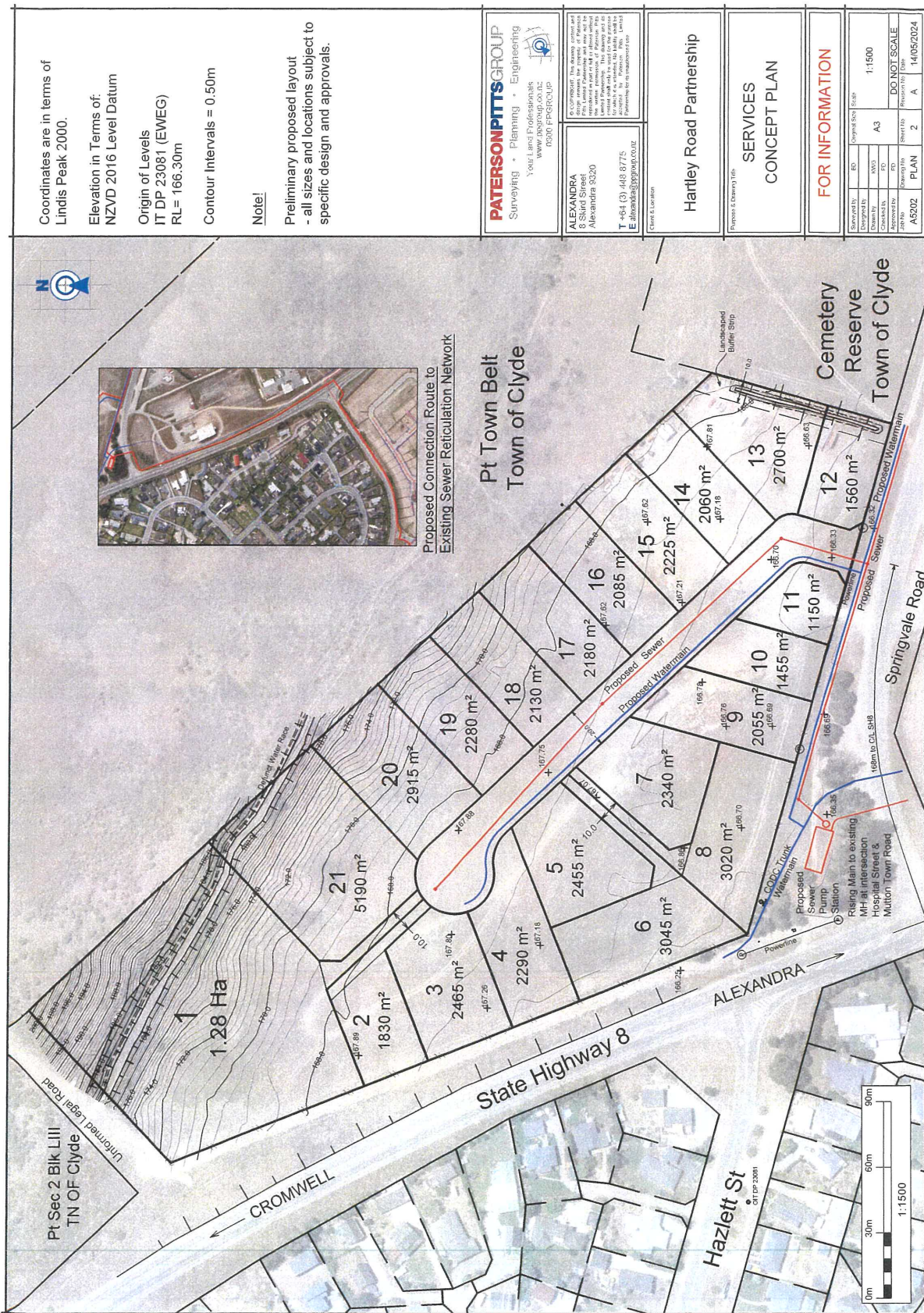
Water Supply & Wastewater Infrastructure Proposals

A5202 Stormwater Calcs

Soakage Calculations									
From Onsite Soakage Test:									
area pit									
4.75									
Test Pit									
1									
Area									
4.75									
Pit Dimensions									
Length									
2.5									
Width									
1.9									
Depth									
0									
dVolume									
0.055									
dTime (s)									
60									
Soakage (l/s)									
0.19									
0.19									
0.19									
Average									
0.16									
0.18									
Soakage Rate									
3100 mm/hr									
Time (s)									
180									
0.73625									
4.1									
0.9 For time period									
Total Soakage Rate									
(overall)									
0.42 l/s/m ²									
Filling									
Infiltration Rate									
1372 mm/hr									
Weighted									
Soakage Rate									
0.38 l/s/m ²									
Note:									
5000 l poured in over									
34 minutes to get to water depth of									
0.275m									
Soakage over filling time =									
3693.75 litres									
=									
1.810661765 l/s									
=									
0.38 l/s/m ²									
Weighted soakage rate:									
0.38 l/s/m ²									
Safety factor									
1.5									
Soakage rate to use									
0.25 l/s/m ²									
Runoff Coefficient									
0.90									
Runoff Flows Q=2.786Cl ^{1/3}									
Area (m ²)									
100									
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A5202 Stormwater Calcs

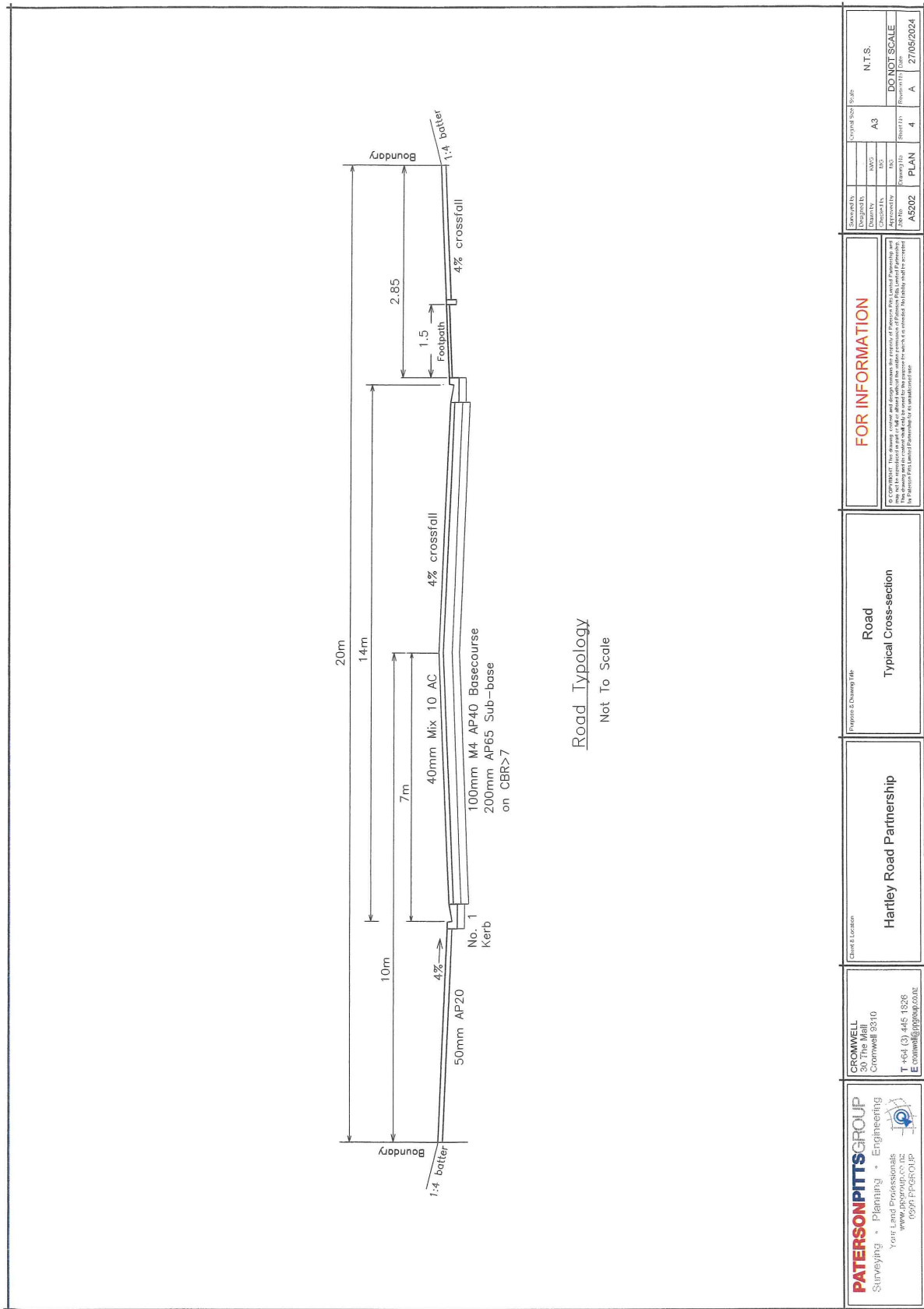
Soakage Calculations From Onsite Soakage Test:		Area pit		Bartley Road		Test Pit			
A5202		3.91							
Soakage Calculations		Area		Soakage (l/s)		Infiltration Rate			
From Onsite Soakage Test:		3.91		5		1163 mm/hr			
Pit Dimensions		Area		Soakage (l/s)		Infiltration Rate			
Length		3.91		5		1163 mm/hr			
Width									
Time (s)		dVolume		Soakage (l/s)		Infiltration Rate			
0		0.01		0.2		1163 mm/hr			
60		0.01		0.2		1163 mm/hr			
120		0.02		0.3		1163 mm/hr			
180		0.02		0.3		1163 mm/hr			
240		0.03		0.5		1163 mm/hr			
300		0.025		0.4		1163 mm/hr			
360		0.015		0.2		1163 mm/hr			
420		0.025		0.4		1163 mm/hr			
480		0.775		Average		1163 mm/hr			
		0.68605		480		Total Soakage Rate		0.27 l/s/m ²	
5000 l poured in over		28 minutes to get to water depth of		0.93 m		Infiltration Rate		747 mm/hr	
Soakage over filling time =		1363.7 litres				Soakage Rate		0.24 l/s/m ²	
		0.81172619 (l/s)							
		0.23 l/s/m ²							
Weighted soakage rate		From HRDS		10 year		20 year		50 year	
Safety factor		Intensity		50		83.3 mm/hr		RCp4.5, (2081 - 2100)	
Soakage rate to use		Depth		8.34		13.9 mm			
		TC 10 minutes							
Runoff Co-efficient		0.90							
Area (m ²)		100		Road Area		CODC max			
1.25		300		400		80m spacing			
2.084		400		500		800			
2.316667		500		600		800			
Below capacity of soakpit		600		700		900			
Soakpit Base =		700		800		900			
Effective soakage @ 1.75m deep		800		900		1000			
		900		1000		1100			
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APPENDIX 4

Roading Typologies



 Surveying • Planning • Engineering Your Lead Professionals www.ppsgroup.co.nz 1079 PIPERS GROUP	GROWELL 20 The Mall Cromwell 3510 T +64 (3) 445 1326 E cromwell@ppgroup.co.nz	Client & Location Hantley Road Partnership	Project & Drawing Title Road Typical Cross-section
FOR INFORMATION			
© Copyright: This drawing is the property of Paterson Pitts Group and is not to be reproduced, stored in a retrieval system, or transmitted in any form or by any means, electronic, mechanical, photocopying, recording, or by any information storage and retrieval system, without the prior written permission of Paterson Pitts Group.			
Drawn By: _____ Checked By: _____ Approved By: _____ Date: _____	Scale: _____ Drawing No: _____ Revision: _____ Project No: _____	Client Ref: _____ Drawing Title: _____ Drawing No: _____ Revision: _____	Original Scale: _____ Sheet No: _____ Total Sheets: _____ Date: _____

File name: \\A:\2024\Hantley Road\CA\CA2\CA2_14.dwg



APPENDIX 5

Confirmation of Telecom Supply

Peter Dymock

From: Chorus Property Development Do Not Reply <npdnoreply@chorus.co.nz>
Sent: Tuesday, 2 April 2024 3:51 pm
To: npdnoreply@chorus.co.nz
Subject: Chorus 10803117: Your enquiry has been closed



Hi

Development address: 16 Springvale Road , Clyde, Central Otago District, 9391

This enquiry has been closed.

Message subject: Confirmation that reticulation is able to be made available

Hi Miles, Please request a quote for the development via the Portal. You do not have to accept this quote, but once produced, you will be able to print this out and it will serve the same purpose as a letter confirming that we can reticulate your development with Fibre. Your current request is for an early design. Please select "design and build" when applying for your new quote. Kind Regards, Jason Chorus Property Development Team

You can reopen and respond to the enquiry if you need to. If there's no further action within 30 days, then the enquiry will be archived, and you'd need to raise a new enquiry if required.

You can also [view the message trail by logging in to your account.](#)

Chorus New Property Development Team

Please do not reply to this email as this inbox is not monitored. For any follow up queries please visit www.chorus.co.nz/develop-with-chorus or [log in to your account](#). If you do not yet have an account with us, you will need to [create an account](#) to view your job progress and documentation.

This email was sent by: Chorus New Zealand Limited 1 Willis Street Wellington CBD, Wellington 6011 New Zealand. We will deal with your information in accordance with our privacy policy (<https://www.chorus.co.nz/terms-and-conditions/our-privacy-policy>). The content of this email (including any attachments) is intended for the addressee only, is confidential and may be legally privileged. If you've received this email in error, please immediately notify the sender and delete this email. This email is not a designated information system for the purposes of the Contract and Commercial Law Act 2017.

Chorus New Zealand Limited

24 May 2024

Chorus reference: 10861569

Attention: Peter Dymock**Quote:** New Property Development**21 connections at 16 Springvale Road, Clyde, Central Otago District, 9391****Your project reference: Hartley Road Partnership Industrial**

Thank you for your enquiry about having Chorus network provided for the above development.

Chorus is pleased to advise that, as at the date of this letter, we are able to provide reticulation for this property development based upon the information that has been provided:

Fibre network	\$21,000.00
---------------	-------------

The total contribution we would require from you is **\$24,150.00 (including GST)**. This fee is a contribution towards the overall cost that Chorus incurs to link your development to our network. This quote is valid for 90 days from 24 May 2024. This quote is conditional on you accepting a New Property Development Contract with us for the above development.

If you choose to have Chorus provide reticulation for your property development, please log back into your account and finalise your details. If there are any changes to the information you have supplied, please amend them online and a new quote will be generated. This quote is based on information given by you and any errors or omissions are your responsibility. We reserve the right to withdraw this quote and requote should we become aware of additional information that would impact the scope of this letter.

Once you would like to proceed with this quote and have confirmed all your details, we will provide you with the full New Property Development Contract, and upon confirmation you have accepted the terms and paid the required contribution, we will start on the design and then build.

For more information on what's involved in getting your development connected, visit our website www.chorus.co.nz/develop-with-chorus

Kind Regards

Chorus New Property Development Team





APPENDIX 6

Confirmation of Power Supply

AURORA ENERGY LIMITED
PO Box 5140, Dunedin 9058
PH 0800 22 00 05
WEB www.auroraenergy.co.nz



04/04/2024

Myles Garmonsway
Paterson Pitts Group

Sent via email only: Myles.Garmonsway@ppgroup.co.nz

Dear Myles,

**ELECTRICITY SUPPLY AVAILABILITY FOR A PROPOSED TWENTY ONE LOT SUBDIVISION.
16 SPRINGVALE ROAD, CLYDE. PT BLK XXXIV TN OF CLYDE, SEC 1 BLK XXXIV TN OF CLYDE, PT BLK
XXXIII TN OF CLYDE, PT BLK XXXI TN OF CLYDE & BLK XXXII TN OF CLYDE. RT 51710.**

Thank you for your inquiry outlining the above proposed development.

Subject to technical, legal and commercial requirements, Aurora Energy can make a Point of Supply¹ (PoS) available for this development.

Disclaimer

This letter confirms that a PoS **can** be made available. This letter **does not** imply that a PoS is available now, or that Aurora Energy will make a PoS available at its cost.

Next Steps

To arrange an electricity connection to the Aurora Energy network, a connection application will be required. General and technical requirements for electricity connections are contained in Aurora Energy's Network Connection Standard. Connection application forms and the Network Connection Standard are available from www.auroraenergy.co.nz.

Yours sincerely

A handwritten signature in black ink, appearing to read "Niel Frear".

Niel Frear

CUSTOMER INITIATED WORKS MANAGER

¹ Point of Supply is defined in section 2(3) of the Electricity Act 1993.



APPENDIX 7
CBR TESTS

TRI5-CBR:11-18, Iss-2



Central Testing Services

18 Ngāpapa St, P.O. Box 397, Alexandra 9340, Central Otago, New Zealand
 P: 03 4487644 W: www.centraltesting.co.nz E: info@centraltesting.co.nz

Page 1 of 1 Page

Reference No: 24/1183

Date: 10 May 2024

TEST REPORT - LABORATORY SOAKED CBR'S

Client Details:	Hartley Road Partnership, Leon@benchmarkconstruction.co.nz	Attention:	L. Van Voxel
Job Description:	Corner of SH8 / Springvale Road		
Sample Description:	Subgrade – See Below	Client Order No:	N/A
Sample Source:	Insitu – See Below	Sample Label No:	N/A
Date & Time Sampled:	Unknown	Sampled By:	Unknown
Sample Method:	Unknown	Date Received:	10-Apr-24
Test Method:	NZS 4407:2015, Test 3.15		

LABORATORY CBR RESULTS			
Sample Source: ^(cs)	S#1	S#2	S#3
Sample Depth: (mm)	0 - 300	0 - 300	0 - 300
Sample Description:	GRAVEL & SAND with some / minor silt	SAND	SAND with minor gravel & trace of silt
Condition of Sample:	Soaked	Soaked	Soaked
Surcharge Mass: (kg)	4.0	4.0	4.0
Time Soaked:	5 days	5 days	5 days
Swell: (%)	0.0	-0.2	-0.2
Water Content as Compacted: (%)	1.4	1.9	0.9
Water Content From Under Plunger: (%)	9.3	14.8	13.0
Dry Density As Compacted: (t/m ³)	2.04	1.75	1.86
CBR Value @ 2.5 mm Penetration:	12	15	25
CBR Value @ 5.0 mm Penetration:	16	20	30
Reported CBR Value:	16	20	30
Contract Specification Requirement	Minimum 7		

Notes:

- The material was received in a natural state.
- The material tested was the fraction passing the 19.0mm test sieve.
- The sample was compacted to NZ Standard Compaction at the water content as received.
- The rate of penetration was 1.00 mm / min.
- Information contained in this report which is Not IANZ Accredited relates to the sample descriptions based on NZ Geotechnical Society Guidelines 2005, the client supplied information ^(cs) and sampling.
- This report may not be reproduced except in full.

Tested By: C. Pearson

Date: 21 to 27-Apr-24

Checked By: 

Approved Signatory



L.T. Smith
Key Technical Personnel



Test results indicated as not accredited are outside the scope of the laboratory's accreditation

Specialist Quality Assurance Service in Aggregate, Concrete and Soils Testing



GeoSolve Ref: 240038

6 June 2024

Hartley Road Partnership
 1 Jennings Way,
 Earnsclough 9391
 CC' Peter Dymock (Patersons)

Attention: Leon Van Boxtel

Geological Review and Natural Hazards Assessment State Highway 8 and Springvale Road, Intersection

1.0 Introduction

This report summarises the results of a preliminary geological review and natural hazards assessment completed for a proposed plan change to a property on the corner of State Highway 8 (SH8) and Springvale Road, Clyde. This report is intended to support the plan change application to Council.



Photo 1. Panoramic site photo looking northwest across the proposed area for plan change.

The assessment was completed for Hartley Road Partnership in accordance with GeoSolve Ltd.'s Short Form Agreement (Ref no. 240038) dated 19th of January 2024, which outlines the scope of work and conditions of engagement.

DUNEDIN
 CROMWELL
 QUEENSTOWN
 WANAKA
 INVERCARGILL

GeoSolve Limited - Cromwell Office:
 8 Pinot Noir Drive
 PO Box 423, Cromwell 9342
Cromwell@geosolve.co.nz

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Page 1 of 7





2.0 Proposed Development

It is proposed to re-zone the existing property from a rural to industrial land use on the Central Otago District Plan. Access to the development will be via Springvale Road.

Preliminary geological and natural hazards information is required from GeoSolve to support an application to Council for plan change. Confirmatory subsurface investigations have not been undertaken as part of this report but are recommended later as part of the resource consent or design phase. Sufficient engineering geological information exists at this stage of the process.

A conceptual plan outlining what a potential future development might look like on the property should it be re-zoned to industrial is presented on Figure 2 attached.

3.0 Preliminary Geological Review

The GNS Science 1:250,000 geological map area of the Wakatipu indicates that the property is underlain by glacial outwash gravels (Q4a and Q12a). These soils are in turn underlain by over-consolidated Bannockburn Formation lake sediment of the Manuherikia Group (mMm) at an unknown depth. Regionally extensive schist bedrock is exposed on the range northwest of Clyde Township and will underlie the site at considerable depths.

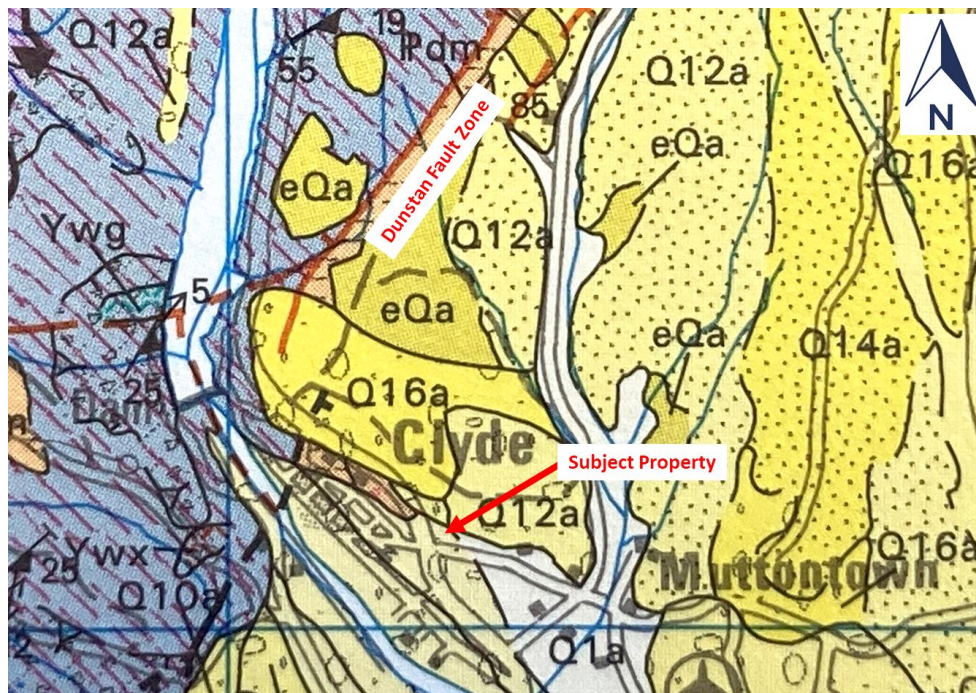


Figure 1. Image taken from the GNS Science 1:250,000 geological map of the property and surrounding area.

An outwash terrace riser strikes northwest oblique to the northeast site boundary. The terrace riser marks the change from the upper Q12a outwash surface compared to the



lower degraded Q4a outwash surface. Site inspection confirmed the presence of four small alluvial fans which have formed along the base of the terrace riser. The fan alluvium is likely to grade between silt, sand, and gravel. An engineered fill batter borders the western edge of the property beneath the state highway.

No spring flows or groundwater seepages were observed within the property and are unlikely in this terrain. An ORC registered borehole (G42/0117) drilled on the opposite side of Springvale Road around 190 m south of the property encountered the regional groundwater table at 26 m below ground level (bgl).

LiDAR contour data for the property and wider area is presented on Figure 2 attached.

4.0 Natural Hazards Assessment

Geological field mapping and relevant features discussed in the following subsections are shown on Figure 2 attached.

Alluvial Fan and Flooding:

Four relatively small alluvial fans terminate within the boundaries of the property. The fans have formed via localised runoff from the upper outwash surface and overlie the lower degraded terrace. Subdued ephemeral gullies dissect the face of the terrace riser above the fans. No evidence of recent sedimentation was observed, and the fans are currently inactive, although this doesn't suggest renewed activity in the future isn't possible. However, given the limited upslope catchment area it's likely the fans have formed due to extreme rainfall (i.e. >500-year return period), alternatively they could be geologically very old having formed immediately post glaciation.

Either way the defunct water race shown on Figure 2 cuts through the head of the fans and forms an effective cut-off trench to capture and divert upslope run-off away from future development. The water race trench ranges around 0.8-1 m deep and is now no longer used. Localised surface run-off from the ephemeral gullies and terrace slope during heavy rainfall is expected to be the primary issue rather than sedimentation.

An existing stormwater channel, shown below in Photo 2, runs alongside the state highway and discharges near the northwestern corner of the property along the edge of the fill batter. The channel collects upslope runoff from an even larger ephemeral gully further northwest along the outwash terrace. Stormwater runoff is currently dispersed via an elongated dispersion swale roughly 2000 m² in area between the toe of the batter and the western site boundary. We understand that Patersons have considered stormwater runoff and dispersion from the channel outlet as part of their scheme plan development.



Photo 2. Looking southeast along the stormwater channel towards the development area beyond.

The location of the stormwater channel and dispersion swale alongside the highway are also shown on Figure 2.

Slope Stability:

Given the gentle gradients within the property there are no slope instability issues for the development. The inclination of the terrace riser is also less than the upper repose angle of 36° for a cohesionless outwash gravel. Earthworks cuts will be required to form sub-horizontal construction platforms on gently sloping ground.

Rock-Roll:

Albeit relatively isolated, there is some potential for localised rock-roll into the development area originating from the upslope terrace riser. Several outwash boulders of variable size and embedment have become exposed by erosion and in some instances could be re-mobilised via seismic shaking or gradual weathering. The two example boulders shown below in Photos 3 & 4 have the most potential to be dislodged from the slope. However, this issue is straightforward to remediate using an excavator or hand tools to pluck the boulders from the slope well in advance of future development. Boulders which are partially embedded within the slope, preventing rock-roll, should be left untouched to avoid undue slope disturbance.



Photos 3 & 4. Example boulders with the most potential to become dislodged from the terrace slope. Geological hammer for scale.

No evidence of historic rock-roll is present on the ground surface within the development area along the base of the terrace.

Seismic Stability/Risk from Active Faults:

Active fault traces were not observed onsite although the Dunstan Fault Zone is mapped as a series of active fault structures within 3 km northwest of the property (refer Figure 1 above). However, due to the estimated >5,000 to ≤ 10,000 years average return periods for earthquakes on this fault zone, the seismic risk posed by this structure is considered relatively low. Furthermore, the property is situated outside the active fault entity area associated with the Dunstan Fault Zone, an inferred area of land potentially subject to ground surface rupture during fault movements.

The Alpine Fault, located approximately 140 km to the northwest, runs along the western foothills of the Southern Alps, and is likely to present a more significant seismic risk in the short term. There is a high probability that a major earthquake of Magnitude 8 or more will occur along the Alpine Fault within the next 50 years and such a rupture is likely to result in moderate ground shaking in the vicinity of Clyde-Alexandra. The Alpine Fault is considered to provide the governing seismic risk for the site from a geotechnical and planning perspective.

Seismic Liquefaction:

The ORC natural hazards database indicates the site is situated within mapped liquefaction category Domain A with low to no liquefaction potential. This has been categorised on the basis that the site is inferred to be predominantly underlain by rock or firm sediments i.e., Bannockburn Formation. Owing to the depth to regional groundwater (approximately 26 m bgl), GeoSolve considers the risk of seismic liquefaction at this site to be low. No further assessment is necessary with respect to this hazard.



5.0 Foundation Bearing Capacity and Subsoil Category

Glacial outwash deposits comprising sand and gravel are likely to predominate beneath future building foundations, although loess and variable fan alluvium are also likely. Outwash gravel typically meets the minimum requirements for NZS 3604:2011 “good ground” conditions, however a range of bearing capacities can be expected on this site and will need to be confirmed via subsurface investigation. For sloping lots (i.e. Lots 1 and 17-21) requirements with regards to foundation footings and the adjacent sloping ground surface will need to be considered.

The site is likely to comprise “Class C” (shallow soil site) or “Class D” (deep soil site) in accordance with NZS 1170.5:2004 seismic provisions. The allocation of Class C or D subsoil category at this site is based on ORC registered boreholes located on the wider Clyde Terrace and the inferred depth to Manuherikia Group (very weak rock). If assurance of subsoil class is required for detailed design a deep borehole investigation would be required to confirm the depth to Manuherikia Group rock beneath the development area.

6.0 Recommendations and Considerations

Site-specific subsurface geotechnical investigations are recommended during resource consent and design stages for future building foundations. Test pitting and Scala penetrometer testing is required to confirm soil parameters and bearing capacity for foundation and earthworks design. Site investigations will also need to assess temporary and permanent batter slopes into sloping ground and any associated retaining parameters.

Future construction will need to consider the effects of surface water run-off and ponding from the upslope terrace riser, ephemeral gullies, and highway stormwater channel. The defunct water race shown on Figure 2 will form an effective cut-off trench to capture and divert upslope run-off away from future development. It is recommended that the defunct water race is assessed to ensure it can take the required overland flow volumes and that it should be upgraded then maintained to serve this purpose. The water race also needs to be checked to confirm any potential for leakage or run-off into the development during flow. Standard floor level elevations and additional cut-off drains can also be utilised to mitigate any residual run-off issue. Additional cut-off drains will need to be incorporated into the stormwater design for the wider development. It’s important that design provisions for the highway stormwater channel be considered now as part of the scheme plan. A stormwater runoff assessment is recommended to be undertaken at the resource consent stage to address all the stormwater issues discussed above. Viable options to manage and mitigate site runoff issues are available.

Problematic boulders on the terrace riser above the development should be plucked/ removed from the slope in advance of future development. However, boulders with partial embedment should be left untouched to prevent undue slope disturbance. Removal of problematic boulders should be confirmed by a geotechnical practitioner at a later stage once the plan change application has been granted. We assume the removal of problematic boulders can be readily facilitated given their location within the town belt (refer Figure 2).



We don't foresee any site-specific constraints with respect to the prevailing geotechnical conditions or natural hazards which would prevent industrial development of the property; noting the recommendations provided above. A risk of seismic activity is present in the region from the Alpine Fault and appropriate allowance should be made for seismic loading during detailed design of any future building, foundations, retaining walls and earthworks.

Based on the current assessment, the development is technically feasible from a geotechnical perspective; noting that site-specific ground investigations and stormwater assessment, reporting and design will be required during the resource consent and design phases.

7.0 Applicability

This report has been prepared for the benefit of our client, Hartley Road Partnership, with respect to the particular brief given to us and it may not be relied upon in other contexts or for any other purpose without our prior review and agreement.

Please do not hesitate to contact the undersigned if we can provide any further assistance with this project.

Report prepared by:

Reviewed for GeoSolve Ltd by:

A handwritten signature in black ink, appearing to read 'James Stewart'.

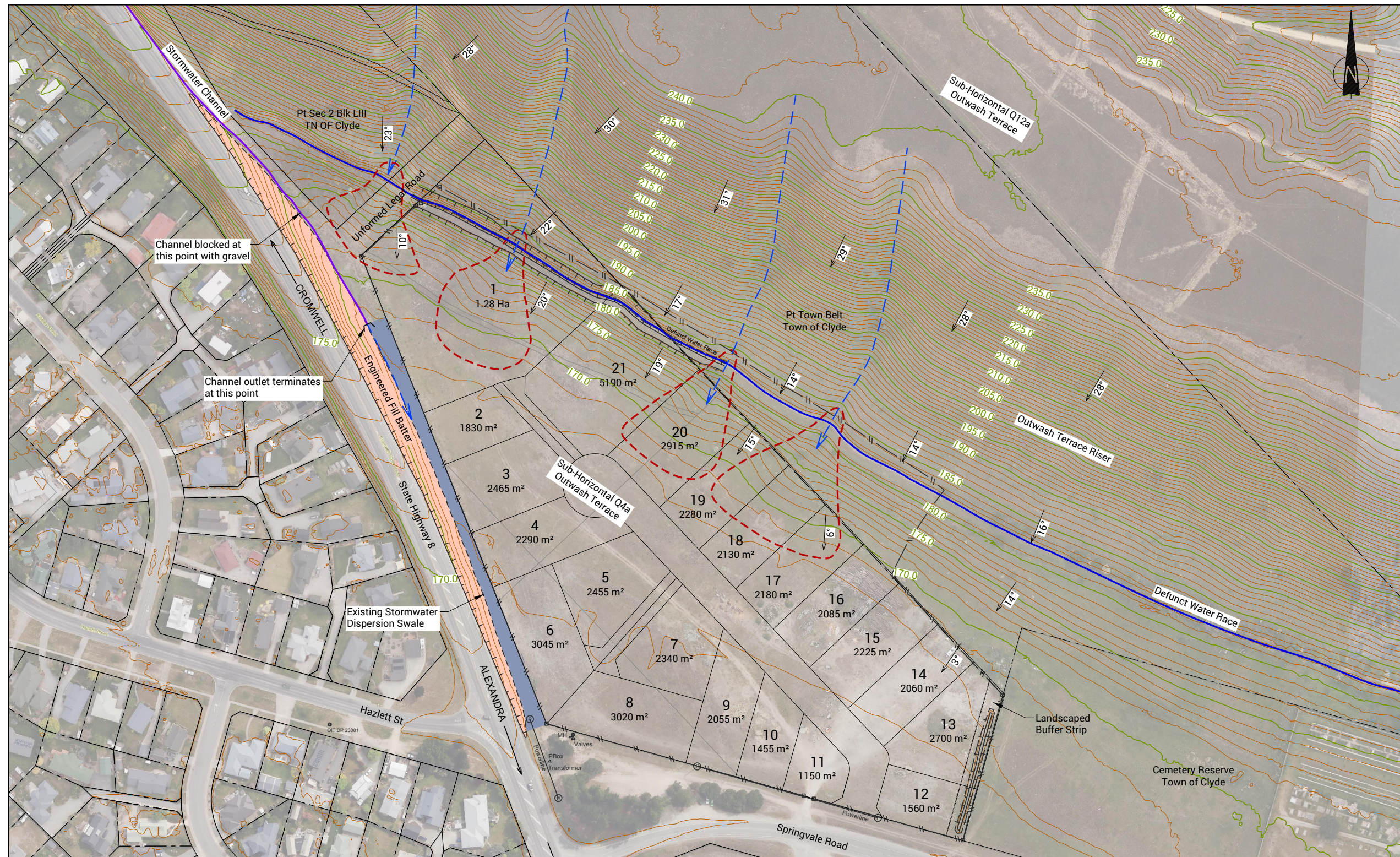
A handwritten signature in black ink, appearing to read 'Fraser Wilson'.

.....
James Stewart
Engineering Geologist

.....
Fraser Wilson
Senior Engineering Geologist

Attachments:

- Subdivision Scheme and Field Mapping Plan (Figure 2).

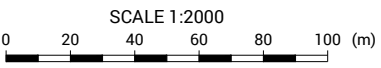


Notes:

1. These drawings have been prepared for the benefit of Hartley Road Partnership with respect to the particular brief given to us and it may not be relied upon in other contexts or for any other purpose without our prior review and agreement.

Legend:

- Alluvial Fans
- Ephemeral Flow Paths
- Defunct Water Race
- Engineered Fill Batter
- Existing Stormwater Dispersion Swale
- Stormwater Channel
- Slope Direction and Angle



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DRAWN	WCG	Jun.24
DRAFTING CHECKED	JAS	Feb.24
APPROVED	FAW	Feb.24
CADFILE: 240038.dwg		
SCALES (AT A3 SIZE): 1:2000		
PROJECT No:	240038	

Hartley Road Partnership
 Corner of SH8 and Springvale Road, Clyde
 Geotechnical Assessment
 Site Plan

FIG No: Figure 2

REV: 0

Proposed Industrial Zone Plan Change, Intersection of SH8 & Springvale Road, Clyde, Landscape Effects Assessment

Proposed Industrial Zone Plan Change, Corner, State Highway 8 & Springvale Road, Clyde

Landscape Effects Assessment Report

5 June 2024



Prepared by

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Proposed Industrial Zone Plan Change, Intersection of SH8 & Springvale Road, Clyde, Landscape Effects Assessment

Introduction

Hartley Road Partnership is applying for a private plan change to rezone a 6.6 ha site at the intersection of State Highway 8 and Springvale Road at Clyde from Rural to Industrial in the Central Otago District Plan (CODP).

This report has been commissioned by the applicants to address the landscape effects of the proposed rezoning and will be structured as follows:

- Methodology
- Site and area description.
- Landscape Values.
- The proposed rezoning
- Recommended mitigation measures
- Landscape effects.
- Statutory provisions assessment.
- Conclusion.

Methodology

This assessment follows the concepts and principles outlined in the New Zealand Institute of Landscape Architects (NZILA) Best practice guidelines¹, and has been informed by a review of the relevant statutory provisions and a site visit on 27 February 2024.

¹ Te Tangi a te Manu, Aotearoa New Zealand Landscape Assessment Guidelines, Tuia Pito Ora New Zealand Institute of Landscape Architects, July 2022.

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Site and area description

Site description

As illustrated in **Figure 1**, the property is located to the northeast side of the intersection of State Highway 8 and Springvale Road at Clyde. Other than for a small area at its northern end which extends onto a terrace face, the site is relatively flat with gentle falls to the southwest and the geology is relatively recent river gravels².

The site is bounded by the State Highway embankment which rises to the west, a steep approximately 60m high natural terrace face to the north-east, and Springvale Road to the south. Its south-eastern end abuts the Clyde Cemetery Reserve, although the historic walled cemetery is approximately 160m distant. An abandoned pre-1900 water race runs along the lower slopes of the terrace face to the north-east of the site and runs through the northern portion of the property.

The land is zoned Rural in the CODP. It is not irrigated and is largely under rough grassland cover. It is currently partly used as a contractor's storage yard.

The landscape context

The site is located adjacent to the settlement of Clyde at the southwestern end of the Manuherikia Basin. The Clutha River / Mata-Au issues from the Cromwell Gorge at this point and has created various river terraces. The site nestles against a distinct approximately 60m high terrace face which rises to its north-east and which is under rough pasture cover. This terrace is part of the Clyde Town Belt, is zoned Rural, and is mainly covered by a Significant Amenity Landscape (SAL) overlay in the CODP.

The Cemetery Reserve which adjoins the site to the east is also zoned Rural and has heritage and notable tree values recognized in Schedule 19.4 of the CODP noted as 'Clyde cemetery and walls' and 'Umbrella (or Stone) Pine, Maritime Pine and Scotts Pine.

² Turnbull I M, 2000, Geology of the Wakatipu Area

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Across State Highway 8, Clyde township is zoned residential in the CODP and has a suburban residential character. On the opposite side of Springvale Road the land is zoned Rural Residential but the properties directly opposite the site are industrial and commercial in character, being a storage yard for Contact Energy Ltd, and a cycle hire and cycle tour business at the terminus for the Otago Central Rail Trail.

Figures 2 - 8 illustrate the character of the site and area.

Landscape Values

The NZILA Landscape Assessment Guidelines define 'landscape' as follows:

Landscape embodies the relationship between people and place. It is the character of an area, how the area is experienced and perceived, and the meanings associated with it.

Landscape values are defined as:

The reasons a landscape is valued.

Values are embodied in certain attributes.

The site itself has no landscape value recognition in the CODP but the terrace face to its northeast is covered by an SAL overlay. The Plan provides no values statements for SAL's however, my assessment is that this terrace has amenity values based on its distinctive outwash terrace landform which retains moderately high levels of legibility under predominantly grassland cover and / or due to naturalistic vegetation patterns. The pre-1900 defunct water race near its base modifies its naturalness to a small extent.

Rural landscape values expressed in the CODP include open space and natural character, with particular mention of the 'open natural character' of the hills and ranges³. In this area, whilst openness and naturalness values are relatively strongly expressed on the terrace face, they are modified generally, by the presence of the township of Clyde across the Highway, and by the greater built density in the Rural Residential area across Springvale Road. The site itself, is currently open and devoid of built elements.

³ CODP Objective 4.3.3 & Policy 4.4.2

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The adjacent cemetery has heritage values of noted significance and the rural character of the site contributes to the cemetery setting to a degree, providing a sense of openness and for views toward the Cairnmuir Mountains. It also provides for views of traffic moving on State highway 8 and of modern housing in Clyde however.

The proposed rezoning

It is proposed to rezone the site in the CODP from Rural to Industrial, with no changes to the objectives or policies of the Industrial Resource Area chapter of the Plan. The existing Industrial Resource Area rules and performance standards are also proposed to be adopted. In terms of landscape effects, the key implications for this site are as follows:

- Subdivision is a controlled activity with matters of control including the mitigation of adverse effects on adjoining resource areas.
- No front or side yards required.
- Building heights of up to 10m are permitted.
- Signs are permitted as follows:
 - on buildings but no higher than the road façade part of the building.
 - A free-standing sign may be higher than the highest point of the roof.
 - 1 double sided sign with a maximum height of 7.5m and a maximum area of 14m² per side.
 - Signs may be illuminated but not moving or flashing.
- Car parking is required at a rate of 1 park / 100m² gross floor area.
- Light-spill must not exceed 10 lux at the road boundary or neighbouring property.

It is assumed that there will be one access point to the property and that this will be as existing at present, off Springvale Road.

The land use permitted under this zoning will potentially result in a major change in character from the currently open rural site, that will be significantly less open and natural. As noted in Section 9.3.1 of the CODP environmental standards are set at '*a lower level than in other resource areas*'. Despite this Objective 9.1.1 is:

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'Protection of Amenity Values' including (b) 'Amenity values of neighbouring resource areas are maintained'.

Recommended mitigation measures

The site does not directly adjoin any residential zone but it is adjacent to a major highway and a cemetery with noted heritage values. Additionally, the residential environment of Clyde is close-by, across State Highway 8, and there is Rural Residential zoned land across Springvale Road.

To mitigate the adverse effects of industrial land use on the landscape values in the vicinity, and to provide for a reasonable level of visual amenity within the proposed zone, the following rules are recommended, with reasons given.

Rule XXX

Within the Lot 1 D.P.600773 Industrial Zone a landscape buffer strip with a minimum width of 10m shall be provided alongside the State Highway 8, Springvale Road and Clyde Cemetery boundaries, as well as the boundary of the unformed legal road to the north of the site below the water race. This shall be planted and managed to provide rapid and effective visual screening and softening of the industrial activities within the zone from road, cemetery, residential and rural residential viewpoints surrounding.

Rule XXX

Within the Lot 1 D.P. 600773 Industrial Zone, there shall be no buildings, or earthworks undertaken that would impact the integrity of the pre-1900 water race intersecting the site, nor on the slopes above this.

Reasons

The rezone site has high levels of visibility from a major highway, cemetery and a significant local road. A framework of trees is required to soften and screen views of

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industrial buildings, yards and signs etc. It will also assist to mitigate effects of lighting from these viewpoints.

The proposed restriction of building and earthworks on the higher part of the site above the water race is to limit visual impact of industrial activity from beyond the site and to maintain the remaining landform coherence of the terrace face. As a pre-1900 historic structure the water race must be retained anyway and will act as a physical barrier to development.

Landscape effects

Landscape effects are defined as follows:

*'An adverse or positive outcome for a landscape value as a consequence of changes to a landscape's physical attributes.'*⁴

I assess the landscape effects of the development against the landscape values discussed above, and those inherent in the relevant statutory provisions. Landscape effects may be positive or adverse in nature, and I rate the degree of effect in terms of the following 7-point rating scale. The relationship of this scale to the relevant RMA terminology is also shown.

Degree of effect assessment scale

<i>Very low</i>	<i>Low</i>	<i>Low-mod</i>	<i>Moderate</i>	<i>Mod-high</i>	<i>High</i>	<i>Very high</i>
<i>Less than minor</i>		<i>Minor</i>	<i>More than minor</i>		<i>Significant</i>	

Physical effects

The proposed rezoning will provide for a change in the character of the site from rural to industrial. The current openness and dominance of natural elements (vegetation) over built elements within the site will potentially change significantly. The land is largely flat

⁴ Te Tangi A Te Manu, Aotearoa New Zealand Landscape Assessment Guidelines. Tuia Pito Ora New Zealand Institute of Landscape Architects, July 2022.

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however, and amenable to development for industrial uses without need for major earthworks. Development will not extend onto the terrace face slopes and will be contained by this natural landform feature.

As regards urban form, the current containment of the urban area of Clyde, on the southwestern side of State Highway 8, will be lost as the land is zoned for industrial uses on the other side of the highway. This urban containment to the southwest of the highway appears more significant on the zoning maps than in reality however, as development on the Contact Energy and Cycle trail yard sites already has a semi commercial / industrial character with large buildings, storage yards and car parks.

I assess physical effects on landscape values as adverse / low-moderate. The nature of the change is adverse because in relation to the current rural character, industrial development involves reduced naturalness and is likely to result in an environment significantly defined by large buildings and 'clutter' associated with stockpiles, signage and vehicle parking. The low-moderate degree of effect reflects the low sensitivity of the site and area to change of this nature. The site is largely flat and has no landscape, natural character or rural amenity values of any special significance. Rural character in the area is also already modified by its peri-urban location.

Visual effects

The following tables provide an analysis of the visual effects of the proposed zone change from representative public viewpoints in the areas surrounding. The viewpoint locations are illustrated in Figure 1.

State Highway 8 to the northwest (see Figures 2 and 3)

Relevance of viewpoint	State Highway 8 is a major highway
Approx. distance to the site	920m – Viewpoint 2 160m – Viewpoint 3
Existing view	Figures 2 and 3 illustrate views toward the proposed zone change site from State Highway 8 to the northwest. These viewpoints are elevated to various

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	degrees and provide an overview of the site in its surroundings. The site is seen in the context of the township of Clyde on the opposite side of the highway and with the well treed rural residential area behind. The large buildings on the Contact Energy and Rail Trail sites are also visible as immediate backdrop. The site has an open rural character and large scale in contrast with areas immediately adjacent and nearby.
Effects of the proposed zone change	Industrial development on this site will extend the footprint of urban Clyde and potentially large buildings will be visible. Rural amenity values will be lost with this change in character but adverse amenity effects in general will be mitigated by the softening provided by the proposed landscape buffer plantings. In this context, adjacent to an existing urban area, industrial land use will integrate acceptably.
Nature / degree of effect on values	Adverse / Low-moderate

State Highway 8 to the south (see Figures 4 and 5)

Relevance of viewpoint	State Highway 8 is a major highway
Approx. distance to the site	550m – Viewpoint 4 215m – Viewpoint 5
Existing view	Figures 4 and 5 illustrate views toward the proposed zone change site from State Highway 8 to the south. In general, the site is well screened from the highway to the south by intervening development including development of a commercial / industrial character on the Rail Trail depot and Contact Energy properties. Where visible, it is significantly screened by existing trees on the road reserve at the corner of Springvale Road and SH8 and is dominated by the rural slopes of the terrace face behind.
Effects of the proposed zone change	Industrial development will result in potentially large buildings being visible, semi-screened by the existing trees, The proposed landscape buffer plantings will extend this screening / softening effect as they mature. The semi commercial / industrial character of the existing development on the Rail Trail depot site in the foreground, also assists to mitigate the degree of adverse effects associated with the proposed zone change. Built development will be seen against the dominant backdrop of the terrace face.
Nature / degree of	Adverse / Low-moderate

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effect on values	
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Hazlett Street close to its intersection with State Highway 8 (see Figure 6)

Relevance of viewpoint	This viewpoint is indicative of views of the site from the highway directly adjacent.
Approx. distance to the site	55m
Existing view	The open grassland of the site is in the foreground from this viewpoint with the terrace face being the major feature behind. The character of the view is currently strongly rural. The photograph slightly understates the visibility of the site from the highway as the viewpoint is slightly lower.
Effects of the proposed zone change	Industrial development such as large buildings, yards and stockpiles etc will significantly change the character of views in this area and rural amenity values will be lost. Amenity values in general will be mitigated by the proposed landscape buffer planting. Effects on road users will be transitory and short-lived.
Nature / degree of effect on values	Adverse / Moderate-high initially, transitioning to Adverse / Low-moderate once planting provides an effective screen. Assuming establishment of suitable trees with rapid growth characteristics, I anticipate that this transition is possible within 10 years.

Springvale Road (see Figure 7)

Relevance of viewpoint	Springvale Road is a major highway
Approx. distance to the site	165m
Existing view	The site is currently viewed as open rural land with the terrace face behind. The Contact Energy depot on the southern side of the road modifies rural character to some degree. The township of Clyde has low visibility due to screening by the State Highway 8 embankment and trees.
Effects of the proposed zone change	Industrial development on the site will change its character and result in a loss of rural character and a reduction in amenity values. Adverse effects will be progressively mitigated as the proposed landscape buffer plantings mature. The existing semi commercial / industrial character of the land on

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	the southern side of the road helps to lower sensitivity to the proposed change.
Nature / degree of effect on values	Adverse / Low-moderate

Clyde Cemetery (see Figure 8)

Relevance of viewpoint	Clyde Cemetery is an important community facility with recognized heritage values.
Approx. distance to the site	The Cemetery Reserve is directly adjacent to the site. The developed part of the cemetery is 170m distant.
Existing view	Westward views from the cemetery are currently across open rural land (including the site) to the State Highway and the township of Clyde, with the Cairnmuir Mountains forming an attractive natural backdrop.
Effects of the proposed zone change	Industrial development will reduce the openness and reduce the current rural amenity. The proposed landscape buffer plantings will form an effective screen that will contribute to the setting of the cemetery and provide qualities of seclusion. They will screen views of not just the proposed industrial development but also the highway. The plantings will also reduce the views available out to the mountains however.
Nature / degree of effect on values	Adverse / Moderate – transitioning to Adverse / low once the landscape buffer is providing effective screening.

Visual effects from private properties

There are residential properties within Clyde, across State Highway 8 from the proposed zone change site. North of its Hazlett Street intersection, the highway is located on an embankment that rises progressively and effectively screens eastward views toward the site from the adjacent residential properties. Highway planting also contributes to this screening. To the south of Hazlett Street, State Highway 8 intersection, the properties adjacent to the highway are at a greater distance and the site is mainly screened by highway plantings and fences.

It is my observation that there are a few properties near the Hazlett Street / State Highway intersection that have views with varying extents of screening, of the proposed

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zone change site. These include 17 Albert Drive, 145 Hazlett Street, 147 Hazlett Street, and 156 Hazlett Street. Of these, I consider that 156 Hazlett Street is the most potentially impacted, being the closest (approx. 40m) and with limited existing landform or vegetative screening.

Industrial development on the site will have adverse effects on current rural amenity values from these properties where visible. As the proposed landscape buffer plantings mature these effects will be screened and softened. The highway and moving traffic on it already reduce amenity from these viewpoints and overall, I rate effects on landscape values as adverse / moderate, reducing to adverse / low as the planting buffer becomes effective.

Landscape effects conclusion

Overall, industrial development will inevitably change the current rural character and will have adverse effects on existing (rural) amenity values. I consider however, that with the mitigation proposed, amenity effects can be acceptably managed and that the change in land use proposed can integrate acceptably, with effects that are no greater than adverse / low-moderate (minor) in the medium – long term.

Statutory provisions assessment

In the tables below, I copy the provisions I consider most relevant to landscape matters associated with the proposed zone change in the relevant statutory documents and provide brief comment.

Central Otago District Plan

Objective / Policy	Comment
4.3.3 Objective – Landscape and Amenity Values <i>To maintain and where practicable enhance</i>	The proposed zone change will entail a change in the character of the site from rural to industrial. Rural character is already modified in the area by

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<p><i>rural amenity values created by the open space, landscape, natural character and built environment values of the District's rural environment, and to maintain the open natural character of the hills and ranges.</i></p>	<p>the proximity to Clyde and by the presence of development with a semi commercial / industrial character on the properties across Springvale Road. There are no rural amenity, landscape, natural character or built amenity values of any significance that will be impacted by the proposed rezoning. The site is located within a valley setting and does not impact the character of the hills and ranges, nor will it impact the terrace face adjacent.</p>
<p>4.4.2 Policy – Landscape and Amenity Values <i>To manage the effects of land use activities and subdivision to ensure that adverse effects on the open space, landscape, natural character and amenity values of the rural environment are avoided, remedied or mitigated through:</i></p> <ul style="list-style-type: none"> <i>a. The design and location of structures and works, particularly in respect of the open natural character of hills and ranges, skylines, prominent places and natural features,</i> <i>b. Development which is compatible with the surrounding environment including the amenity values of adjoining properties, ...</i> <i>g. Encouraging the location and design of buildings to maintain the open natural character of hills and ranges without compromising the landscape and amenity values of prominent hillsides and terraces ...</i> 	<p>See comments with regard to Objective 4.3.3 above. Effects on the amenity values of adjoining and nearby properties will be effectively managed by the proposed landscape buffer plantings.</p>
<p>4.4.8 Policy – Adverse Effects on the Amenity Values of Neighbouring Properties <i>To ensure that the effects associated with</i></p>	<p>Industrial activities have the potential to adversely affect the outlook from a few adjacent and nearby properties. In recognition of this, a</p>

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<p><i>some activities including (but not limited to):</i> <i>c. A reduction in visual amenity due to excessive signage and the storage of goods or waste products on the site, ... do not significantly adversely affect the amenity values and privacy of neighbouring properties ...</i></p>	<p>planted buffer is proposed</p>
<p>4.4.10 Policy – Rural Subdivision and Development <i>To ensure that the subdivision and use of land in the Rural Resource Area avoids, remedies or mitigates adverse effects on:</i> <i>a. The open space, landscape and natural character amenity values of the rural environment in particular the hills and ranges,</i> <i>b. The natural character and values of the District's wetlands, lakes, rivers and their margins,</i> <i>c. The production and amenity values of neighbouring properties, ...</i></p>	<p>The proposal is for a zone change to provide for industrial development. The proposal provides for buffer plantings to mitigate adverse amenity effects on surrounding areas. In general, however, there are no significant landscape or natural character values that will be impacted. The site is adjacent to the existing urban area of Clyde, in a valley floor location and development will not extend onto the adjacent terrace face, which is a natural feature in the area.</p>
<p>6.3.2 Objective – Amenity Values <i>To manage urban growth and development so as to promote the maintenance and enhancement of the environmental quality and amenity values of the particular environments found within the District's urban areas.</i></p>	<p>The proposed plan change will result in an expansion of the urban area of Clyde across State Highway 8, but for a discrete industrial enclave. The highway and the proposed landscape buffer will protect residential amenity values within the current urban area.</p>
<p>6.4.2 Policy - Expansion of Urban Areas <i>To enable the expansion of urban areas or urban infrastructure in a manner that avoids, remedies or mitigates adverse effects on:</i> <i>(a) Adjoining rural areas.</i> <i>(b) Outstanding landscape values.</i></p>	<p>The site is a somewhat isolated block of flat rural land between urban Clyde, an area of Rural Residential zoned land, the cemetery, and the steep terrace face. Other than the terrace face, it is poorly linked with other rural land. There are no outstanding landscape areas, water bodies or</p>

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<p>(c) <i>The natural character of water bodies and their margins....</i></p> <p>(h) <i>The intrinsic values of areas of significant indigenous vegetation and habitats of significant indigenous fauna.</i></p>	<p>significant indigenous vegetation impacted.</p>
<p>9.1.1 Objective - Protection of Amenity Values</p> <p><i>To manage industrial activities to ensure that:</i></p> <p>(a) <i>Adverse effects on other land uses are avoided, remedied or mitigated, and</i></p> <p>(b) <i>Amenity values of neighbouring resource areas are maintained</i></p>	<p>The proposed plan change, including the recommended landscape buffer, will manage the development of industrial activities to acceptably mitigate adverse effects on the amenity of surrounding areas</p>
<p>9.2.1 Policy - Provision for Industrial Activities</p> <p><i>To provide for the location of industrial activities to avoid, remedy or mitigate adverse effects on other land use activities.</i></p>	<p>The site is buffered from the residential area of Clyde by the State Highway 8 embankment. The proposed planted strip will reinforce this and will also provide an effective buffer from the cemetery, the adjacent roads, and the rural residential area to the south.</p>
<p>9.2.2 Policy - Maintenance of Visual Amenity Values</p> <p><i>To avoid, remedy or mitigate the adverse visual appearance that some industrial areas and activities can have by:</i></p> <p>(a) <i>Ensuring appropriate separation and screening from adjacent resource areas.</i></p> <p>(b) <i>Ensuring that the bulk and location of buildings does not dominate adjacent resource areas.</i></p> <p>(c) <i>Reducing the visual intrusion of signs.</i></p>	<p>The proposed planted buffer will ensure that adverse visual amenity effects of the industrial activities (as controlled by the CODP rules) are effectively mitigated.</p>

Proposed Industrial Zone Plan Change, Intersection of SH8 & Springvale Road, Clyde, Landscape Effects Assessment

Partially operative Otago Regional Policy Statement 2019

Objective / Policy	Comment
<p>Objective 4.5 <i>Urban growth and development is well designed, occurs in a strategic and coordinated way, and integrates effectively with adjoining urban and rural environments</i></p>	<p>The proposed industrial zone site is a relatively discrete enclave, poorly linked with productive rural land but well buffered from existing residential areas in Clyde. Whilst separated from the existing urban area by the State Highway, it will be seen as linked with this in terms of urban form, and not as an isolated or sporadic node.</p>
<p>Policy 4.5.1 Providing for urban growth and development <i>Provide for urban growth and development in a strategic and co-ordinated way, including by: ...</i> <i>h) Restricting urban growth and development to areas that avoid reverse sensitivity effects unless those effects can be adequately managed;</i></p>	<p>Potential reverse sensitivity effects include adverse effects on visual amenity from residential and rural residential areas surrounding, as well as the Clyde Cemetery. The proposed planting buffer will effectively mitigate these effects.</p>
<p>Policy 4.5.3 Urban design <i>Design new urban development with regard to:</i> ... <i>b) A built form that relates well to its surrounding environment; ...</i></p>	<p>See comments in relation to Objective 4.5 above.</p>

Proposed Otago Regional Policy Statement 2021

Objective / Policy	Comment
<p>Objectives UFD-O1 – Form and function of urban areas</p>	<p>Expansion of urban Clyde and provision for industrial land use in the area proposed will not</p>

Proposed Industrial Zone Plan Change, Intersection of SH8 & Springvale Road, Clyde, Landscape Effects Assessment

<p><i>The form and functioning of Otago's urban areas: ...</i></p> <p><i>(2) maintains or enhances the significant values and features identified in this RPS, and the character and resources of each urban area.</i></p>	<p>have any adverse effects on areas with significant landscape or natural character values. The proposed structure plantings will also ensure that adverse effects on the visual amenity of surrounding / nearby zones are acceptably mitigated.</p>
<p>UFD-O2 – Development of urban areas</p> <p><i>The development and change of Otago's urban areas: ...</i></p> <p><i>(3) respects and wherever possible enhances the area's history, setting, and natural and built environment,</i></p> <p><i>(4) delivers good urban design outcomes, and improves liveability,</i></p> <p><i>(6) minimises conflict between incompatible activities, ...</i></p>	<p>Whilst seen as an extension to urban Clyde, the proposed industrial development will be appropriately separated and buffered from residential land use by the highway and proposed plantings, and will not extend onto, or impact the steep terrace landform to its north. Adverse effects on surrounding areas will be mitigated by the proposed buffer plantings.</p>
<p>UFD-O4 – Development in rural areas</p> <p><i>Development in Otago's rural areas occurs in a way that:</i></p> <p><i>(1) avoids impacts on significant values and features identified in this RPS, ...</i></p> <p><i>(3) only provides for urban expansion, ..., in locations identified through strategic planning or zoned within district plans as suitable for such development; and</i></p> <p><i>(4) outside of areas identified in (3), maintains and enhances the natural and physical resources that support ..., rural character, ...</i></p>	<p>The proposal will change the zoning on the site from rural to industrial. This site has no significant landscape, natural character or rural amenity values.</p>
<p>UFD-P4 – Urban expansion</p> <p><i>Expansion of existing urban areas is facilitated where the expansion: ...</i></p> <p><i>(2) will not result in inefficient or sporadic patterns of settlement and residential growth,</i></p>	<p>The site is adjacent to the urban area of Clyde and in terms of urban form, will read as part of the township, albeit with a distinct industrial character, and will be appropriately screened. Reverse sensitivity visual effects will be</p>

Proposed Industrial Zone Plan Change, Intersection of SH8 & Springvale Road, Clyde, Landscape Effects Assessment

<p>...</p> <p><i>(7) locates the new urban/rural zone boundary interface by considering:</i></p> <p><i>(a) adverse effects, particularly reverse sensitivity, on rural areas ...and</i></p> <p><i>(b) key natural or built barriers or physical features, significant values or features identified in this RPS, or cadastral boundaries that will result in a permanent, logical and defensible long term limit beyond which further urban expansion is demonstrably inappropriate and unlikely, ... or</i></p> <p><i>(c) reflects a short or medium term, intermediate or temporary zoning or infrastructure servicing boundary ...</i></p>	<p>mitigated by the proposed buffer planting. The development will not extend onto the steep terrace face and is constrained on all other sides by roads and the cemetery.</p>
---	--

Conclusion

This application is for a change from Rural to Industrial zoning of a 6.6 ha site adjacent to State Highway 8 on the eastern side of Clyde. The site is largely flat and isolated from productive rural land by a steep terrace face to the north and the Clyde Cemetery to the east. There is Rural Residential zoned land to its south across Springvale Road. There are no landscape, natural character or rural amenity values of any particular note and in my assessment, the sensitivity of the site to the change proposed is low.

Adoption of the CODP Industrial Zone provisions is proposed to control development. However, this report recommends some extra provisions particular to this site. These involve the establishment of a planted landscape buffer around the road and cemetery boundaries, and a restriction on the extent of development on the terrace face.

Proposed Industrial Zone Plan Change, Intersection of SH8 & Springvale Road, Clyde, Landscape Effects Assessment

Assuming adoption of the proposed development controls, I assess the effects of the proposed plan change on landscape values as adverse in nature but low-moderate (minor) in degree. I consider that the zone change is generally consistent with the statutory provisions relating to landscape values and effects.



Mike Moore
Registered NZILA Landscape Architect



Figure 1: Proposed Industrial Zone, Clyde. Site and Photo-points Location Plan



Figure 2: View toward the site from State Highway 8 approx. 920m to the northwest

Camera: Camera EOS 80D
Image: Stitched photographs - focal length 50mm



Figure 3: View toward the site from State Highway 8 approx. 160m to the northwest

Camera: Camera EOS 80D
Image: Stitched photographs - focal length 50mm



Figure 4: View toward the site from State Highway 8 approx. 550m to the south

Camera: Camera EOS 80D
Image: Stitched photographs – focal length 50mm



Figure 5: View toward the site from State Highway 8 approx. 215m to the south

Camera: Camera EOS 80D
Image: Stitched photographs – focal length 50mm

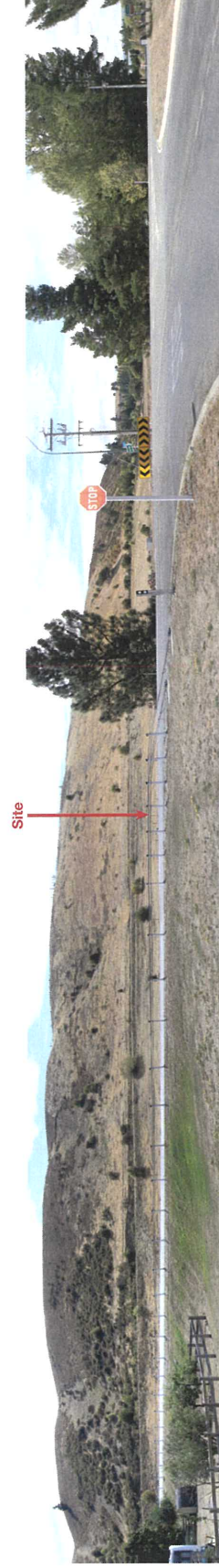


Figure 6: View eastward toward the site from Hazlett Street, close to its intersection with State Highway 8

Camera: Camera EOS 80D
Image: Stitched photographs – focal length 50mm

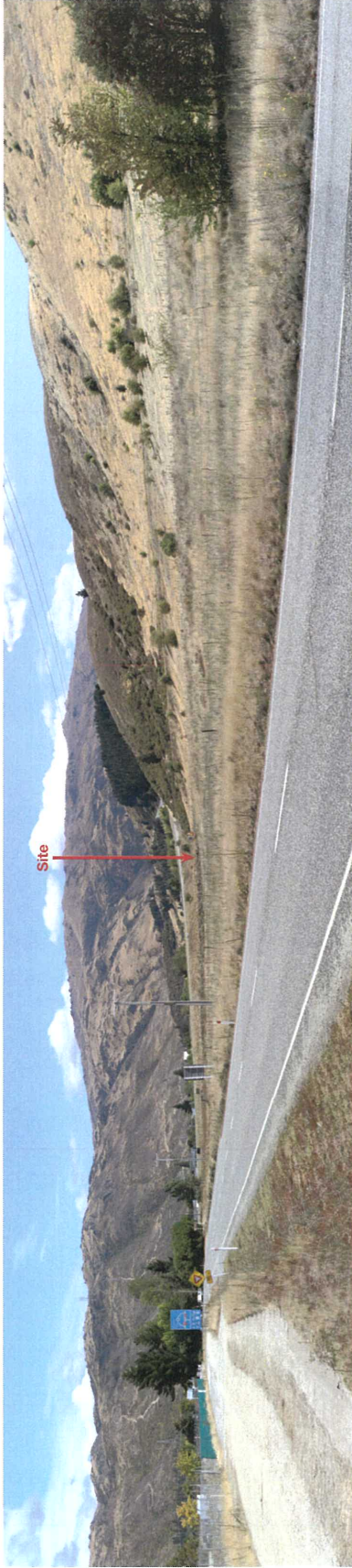


Figure 7: View north-westward toward the site from Springvale Road, approx. 165m from the site boundary

Camera: Camera EOS 80D
Image: Stitched photographs – focal length 50mm

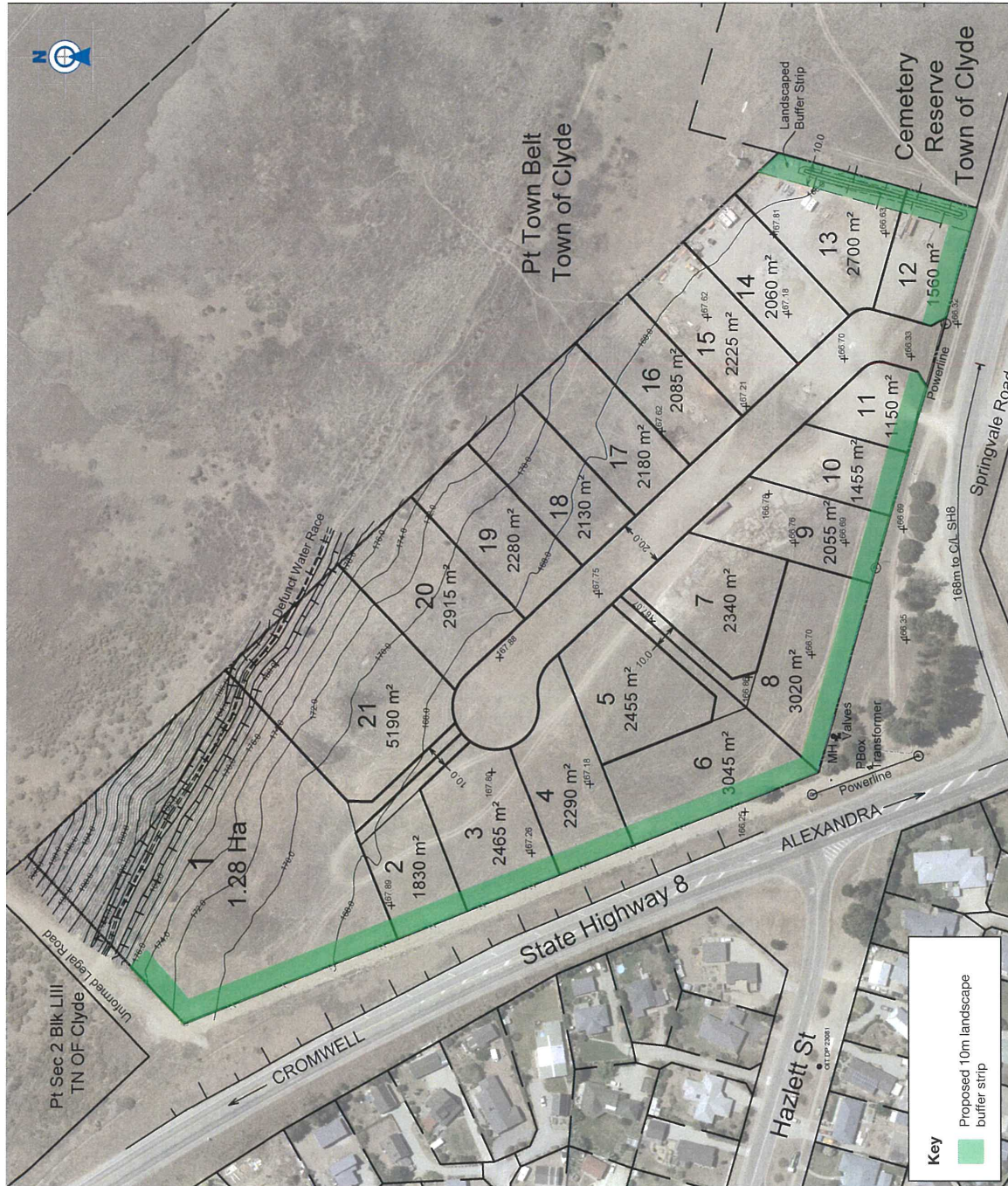


Figure 8: View toward the site from Clyde Cemetery

Camera: Camera EOS 80D
Image: Stitched photographs – focal length 50mm

Landscape Buffer Strip Performance Standard

The landscape buffer strip is to be 10m minimum width and is to be planted to provide rapid and effective screening and softening of the industrial activities within the zone (buildings, yards, stockpiles, signage etc) from viewpoints surrounding.



Scale 1:500 (A3)

Figure 9: Proposed Industrial Zone – Clyde. Landscape Mitigation Concept Plan

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

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REQUEST FOR A CHANGE TO THE OPERATIVE
CENTRAL OTAGO DISTRICT PLAN
LAND PRODUCTIVITY REPORT

PROJECT:	Springvale Road, Clyde, Request for a Change to the Operative Central Otago District Plan
PRINCIPAL:	Hartley Road Partnership
OUR REF:	A5202
DATE:	May 2024

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REVISION / APPROVAL PANEL

Rev:	Date:	Prepared By:	Reviewed By:	Comments:
0	2 May 2024	PLD	DW	Initial Draft
1				Final

Prepared by:
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1.0 Scope

Paterson Pitts Limited Partnership (PPLP) has been engaged by Hartley Road Partnership to provide a land productivity report to support a private plan change request that seeks to re-zone 6.6ha of land at Springvale Road and SH8, Clyde from Rural Resource Area to Industrial Resource Area.

Part of the site is mapped as Land Use Capability ("LUC") Class 3 by Landcare Research NZ Ltd. Refer to the Landcare mapping at **Appendix "1"**. The request is therefore subject to the National Policy Statement for Highly Productive Land 2022 ("NPS-HPL") in accordance with sec 3.5 (7) of the NPS-HPL.

This report analyses the productive land capacity of the site and addresses the application of the NPS-HPL to the Request. The report needs to be read in conjunction with the Landscape, Geotechnical and Soil Contamination reports that support the Request.

2.0 The Site

A topographic plan and soil type map of the site is attached at **Appendix "2"**. The site is described in some detail in the above reports. Approximately $\frac{1}{4}$ of the site consists of the lower southwest facing slopes of a 120m high terrace riser above the site with the slope angle varying from 15 degrees to 30 degrees. This slope is traversed by the remains of a defunct water race which is to be retained as a stormwater intercept channel.

The southerly aspect and steepness of this slope make it unsuitable for intensive productive use for viticulture or horticulture.

The remainder of the site is a sandy flat covered in depleted dryland pasture and bare ground, part of which is currently used as a contractors storage yard. Part of the site was formerly used as a poultry farm for a time, but the site has otherwise never historically been used for productive rural use.

The area of the site suitable for intensive productive rural use is approximately 4.5ha.

There is nothing in the soil contamination report that would prevent the 4.5 ha of flat from being used for productive rural use.

The site is a pocket of rural zoned land isolated from other land used for productive rural purposes by roads, the terrace riser, the Clyde urban area, the Clyde cemetery, land used for industrial purposes by Contact Energy, the Central Otago Rail Trail terminus and life-style blocks along Springvale Road.

3.0 Soils

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The site's soils have been mapped by Landcare Research and the ORC's "Grow Otago" database. The "Grow Otago" mapping is however derived from the Landcare mapping. The soil types are strongly correlated with topography as shown in the plan at **Appendix "2"**

The Landcare and ORC soil mapping and supporting information is attached at **Appendix "3"**

The lower sandy flat soil is classified as Molyneuxf (Sib 8) by Landcare Research being very a semi-arid, shallow sandy soil, well drained with a Plant Available Water (PAW) profile of 86mm. Grow Otago classifies the soil as Mx3aG being Molyneux stoney sand, flat to gently undulating with low PAW. This soil is utilised elsewhere in the region for horticulture and viticulture, but requires significant irrigation application to realise this potential

The gentler slopes at the foot of the terrace riser are classified as Molyneuxf (Sib 5) by Landcare Research being a very shallow well drained sandy soil with a PAW of 106mm. Grow Otago classifies the soil as Rp3aR being Ripponvale stoney sand, rolling with low PAW. This soil is commonly used for viticulture and horticulture, but likewise requires significant irrigation. However, the southerly aspect of this soil on this sloping site make it generally unsuitable for viticulture

The steep (30 deg) slopes of the upper terrace riser are classified as Molyneuxf (Sib 10) by Landcare Research being a shallow sandy well drained soil with a PAW of 78mm. Grow Otago classifies the soil as Lt2sS being Letts shallow sand, steep with low PAW. These soils are formed on the distinctive steep terrace risers in the Upper Clutha and Lower Manuherikia Valleys which are far too steep to allow any highly productive use, being generally used for very low intensity dryland grazing.

4.0 Climate

From the Otago Regional Council's "grow Otago" data base at **Attachment "4"**:

- Growing Degree Days (GDD) for 10deg C base are 951-1000hours
- Median Annual Rainfall is 401-450mm
- Dry summer rainfall is 61-80mm
- Median Summer Rainfall is 101-120mm
- Median potential evapotranspiration (Nov-Dec) is 231- 235mm
- Median potential evapotranspiration (Jan-Feb) is 206-210mm

The high GDD of the site makes it very suitable for intensive productive use of the flatter parts of the site, most likely for viticulture and horticulture, including cherries and all types of pip and stone fruit.

However, given the very high summer moisture deficit of the site, significant Irrigation application is essential to realise this productive potential as is the norm for highly productive land throughout Central Otago. This is particularly so given the site's very high potential evapotranspiration rate over the summer growing season and low Plant Available Water (PAW) of the site, due to its light sandy/gravelly soils.

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5.0 Irrigation/Frost Fighting Water Requirements and Water Supply Availability

The Otago Regional Council has prepared a report **Guidelines for Reasonable Irrigation Water Requirements in the Otago Region C15000 dated 24/07/2017**

(the “Aqualinc Report”) . Relevant extracts from the Aqualinc Report are at **Appendix “5”**

The relevant irrigation water demand from the report is as follows

Crop	Area (ha)	Maximum Daily Demand (mm)	Maximum Daily Demand (m3)	Seasonal Demand (mm) 90%	Seasonal Demand (m3)90%
Pasture	4.5	4.8	216	773	37,785
Viticulture	4.5	2.42	109	217	9,765
Stone & Pip fruit	4.5	5.3	239	724	32,580

As a check on these Otago specific requirements , Irrigation NZ’s generic New Zealand wide on-line calculator (prepared by Aqualinc) at **Appendix “5”** gives the following very similar results :

Pasture – 238m3/day & 33,786m3/year

Viticulture – 99m3/day & 7,160m3/year

Stone fruit – 225m3/day & 31,869m3/year

Significant amounts of water will also be required for frost fighting for viticulture and horticulture , given that the proximity of the site to the Clyde Township will prevent the use of frost fans . At an allowance of a 6mm/hour application rate over a 6 hour frost event over 4.5ha for up to 8 events per season will require 12,960m3 of water per season . As the application period is much less than the irrigation daily application period , storage is normally required . This will require a storage dam of approximately 8500m2 , further reducing the area available for crop growing .

In conclusion , large amounts of irrigation and frost fighting water will be required to realise any highly productive use of the site . However the site does not have access to an irrigation supply , either from a reticulated irrigation scheme or from a potential groundwater source . Please refer to the attached letter at **Appendix “6”** from the Manuherikia Irrigation Co-operative Society Ltd dated 18 January 2000 which stated that the site had no water entitlement from the Manuherikia Scheme . The Requestor advises that the situation has not changed since then . Given that the upcoming setting of a minimum flow for the Manuherikia River under a new Regional Land and Water Plan will almost certainly result in a reduction in the scheme’s allowable take out of the river , it is highly unlikely that a block of water will be available from the scheme in the future . An attempt was made on 23 December 1999 to drill for water on the site by the then McNeil Drilling Company Ltd . The well was dry and the Requestor was advised that there was *“no groundwater potential from clay bound gravels “* . See bore log at **Appendix “6”**

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6.0 Reverse Sensitivity Effects

Frost fans will not be able to comply with the noise requirements of standard 4.7.6 E (c) of the Operative District Plan (“ODP”) due to the proximity of the site to the Clyde Residential Area which includes Dunstan Hospital and a retirement village . A further constraint on the use of the site for horticulture and viticulture is that audible bird deterrent devices will also not be able to comply with noise standard 4.7.6E(b) of the ODP due to the aforementioned proximity. Other potential reverse sensitivity effects on the Clyde Residential Area include spray drift, night shooting for rabbit control and machinery noise, particularly at night .

In general horticulture and viticulture are incompatible with closely adjoining residential neighbourhoods . The use of frost fans and audible bird scaring devices in particular are a persistent and ongoing source of controversy and complaints to the Central Otago District Council from residents in the Cromwell , Clyde and Alexandra townships , Pisa Moorings , Bannockburn etc and their surrounding lifestyle blocks .

7.0 National Policy Statement on Highly Productive Land 2022 (NPS-HPL)

The Landcare LUC mapping in Attachment A shows the site to be subject to LUC Class 3 and LUC Class 6 classification . The mapping does not correlate well with the detailed topography of the site in that the steep unproductive terrace riser within the site is mapped as LUC class 3 while half of the potentially productive lower flat is classed as LUC 6 . However this is likely a consequence of the small (1:25,000) regional scale of the mapping.

7.1 Policies and Objectives

The Objectives and Policies of the NPS-HPL are :

Objective 2.1 : *Highly productive land is recognised as a resource with finite characteristics and long-term values for land-based primary production.*

Policy 2.2 (1) : *Highly Productive land is recognised as a resource with finite characteristics and long – term values for land-based primary production.*

Comment : It is acknowledged that part of the site is potentially suitable for highly productive use . However the lack of a suitable irrigation supply and potential reverse sensitivity effects with the adjacent Clyde residential area effectively prevents this potential from ever being realised

Policy 2.2 (4) : *The use of highly productive land for land-based primary production is prioritised and supported .*

Comment : See above comments under policy 2.2 (1)

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Policy 2.2 (5) : *The urban re-zoning of highly productive land is avoided , except as provided for in this National Policy Statement*

Comment : See discussion below under clauses 3.6 , 3.9 ,3.10 of the NPS-HPL for an explanation of how the Request complies with the exception provisions of the NPS-HPL

Policy 2.2 (8) : *Highly Productive Land is protected from inappropriate use and development*

Comment : Given that it is not possible to realise the productive potential of the site , re-zoning the site for industrial activity is not an inappropriate use of the site

Policy 2.2 (9) : *Reverse Sensitivity effects are managed so as not to constrain land-based primary production activities on highly productive land*

Comment : The site is an isolated pocket of rural zoned land which is at least a kilometre away from any other land used for land-based primary production on highly productive land . Zoning the site industrial will have no reverse sensitivity effects on highly productive land . In fact , the opposite is the case as the proximity of the Clyde residential area creates reverse sensitivity effects within Clyde consequent on the use of the site itself for highly productive use .

7.2 Clauses 3.6 (4) & (5)

These clauses provide that :

(4) Territorial authorities that are not Tier 1 or 2 may allow urban rezoning of highly productive land only if :

- (a) The urban zoning is required to provide sufficient development capacity to meet expected demand for housing or business land in the district; and*
- (b) There are no other reasonably practical and feasible options for providing the required development capacity ; and*
- (c) The environmental , social, cultural and economic benefits of re-zoning outweigh the environmental , social and economic costs associated with the loss of highly productive land for primary based production , taking into account both tangible & intangible values*

(5) Territorial authorities must take measures to ensure that the spatial extent of any urban zone covering highly productive land is the minimum necessary to provide the required development capacity while achieving a well-functioning urban environment

Comment : As outlined in the Economic Assessment prepared by Savvy Consulting there is a requirement for sufficient development capacity to be provided at Clyde for industrial use and this site is the best practicable option and of sufficient size to provide that capacity . There is other land on the opposite side of Springvale Road that is currently used for industrial purposes under a scheduled activity in the ODP . However use of this land is restricted to the scheduled activity (Clyde Storage Shed) associated with the Clyde & Roxburgh Hydro Dams . The Economic Assessment also finds that the economic benefits of re-zoning outweigh the economic costs associated with the loss

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of highly productive land . Given that it is not possible to realise the primary based productive capacity of the land in any case , there will be no actual loss of highly productive land and therefore no environmental , social and economic costs associated with the loss of highly productive land .

7.3 Clause 3.9 (3)

This clause provides that

Territorial authorities must take measures to ensure that any use or development on highly productive land :

- (a) Minimises or mitigates any actual loss or potential cumulative loss of the availability and productive capacity of highly productive land in their district; and*
- (b) Avoids if possible , or otherwise mitigates any actual or potential reverse sensitivity effects on land-based primary production activities from the use or development*

Comment: There is no actual loss of highly productive land , given the land's productive potential cannot be realised. The site is remote from other land used for highly productive rural purposes , therefore no reverse sensitivity effects arise from Industrial use of the site

7.4 Clause 3.10 Exemption for highly productive land subject to permanent or long-term constraints

This clause provides that :

- (1) Territorial authorities may only allow highly productive land to be subdivided, used , or developed for activities not otherwise enabled under clauses 3.7,3.8, or 3.9 if satisfied that :*
 - (a) There are permanent or long-term constraints on the land that mean the use of the highly productive land for land-based primary production is not able to be economically viable for at least 30 years ; and*

Comment : The lack of a suitable irrigation supply and reverse sensitivity effects with the adjoining Clyde township are permanent and fatal constraints on the use of the site for highly productive land-based primary production .

- (b) The subdivision ,use, or development :*
 - (i) Avoids any significant loss (either individually or cumulatively) of productive capacity of highly productive land in the district ; and*
 - (ii) Avoids the fragmentation of large and geographically cohesive areas of highly productive land ; and*
 - (iii) Avoids if possible , or otherwise mitigates , any potentially reverse sensitivity effects on surrounding land-based primary production from the subdivision use , or development ; and*

Comment : As the site cannot be used for highly productive purposes, there is no actual loss of highly productive land . The site is not part of a large and geographically cohesive area of highly

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productive land . The site is remote from any other area of highly productive land subject to the NPS-HPL , therefore no reverse sensitivity issues arise

(c) the environmental , social , cultural and economic benefits of the subdivision, use or development outweigh the long-term environmental , social , cultural and economic costs associated with the loss of highly productive land for land-based primary production , taking into account both tangible and intangible values

Comment : refer to the comments under clause 3.6(4) (c) in para 7.2 above

(2) In order to satisfy a territorial authority as required by subclause 1 (a) , an applicant must demonstrate that the permanent or long term constraints on economic viability cannot be addressed through any reasonably practicable options that would retain the productive capacity of the highly productive land , by evaluating options such as (without limitation) :

(a) alternate forms of land-based primary production:

(b) improved land management strategies:

(c) alternative production strategies:

(d) water efficiency or storage methods:

(e) reallocation or transfer of water and nutrient allocations:

(f) boundary adjustments(including amalgamations):

(g) lease arrangements

Comment : The fundamental issue at stake is that any form of highly productive land-use in Central Otago , be it horticulture , viticulture , cropping , market gardening or pastoral use requires irrigation regardless of what land management strategy or alternative production strategy is used . The site does not have access to an irrigation water supply and there are no alternative water allocations available and it is highly unlikely they will ever be available , given the likely outcome of the upcoming new Regional Policy Statement and Land and Water Plan. A boundary adjustment with other adjoining land is not an option .

(3) Any evaluation under subclause (2) of reasonably practical options :

(a) must not take into account the potential economic benefit of using the highly productive land for the purposes other than land-based primary production; and

(b) must consider the impact that the loss of the highly productive land would have on the landholding on which the highly productive land occurs ; and

(c) must consider the future productive potential of land-based primary production on the highly productive land, not limited by past or present uses

Comment : This evaluation does not consider the economic benefit of the use of the land for industrial purposes . As the landholding cannot actually be used for land-based highly productive purposes, there is no adverse impact on the landholding ("landholding" as defined in in the Resource Management (National Environmental Standard for Freshwater) Regulations 2020). This evaluation does not consider past or present uses of the site in assessing its productive land use capacity.

(4) The size of the land holding in which the highly productive land use is not of itself a determinant of a permanent long-term constraint.

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Comment : This evaluation does not consider the size of the land holding as a constraint on its productive capacity . It is acknowledged that 4.5ha of highly productive land is a viable unit for horticulture , in particular cherries , or viticulture.

8.0 Conclusion

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 this 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 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 .

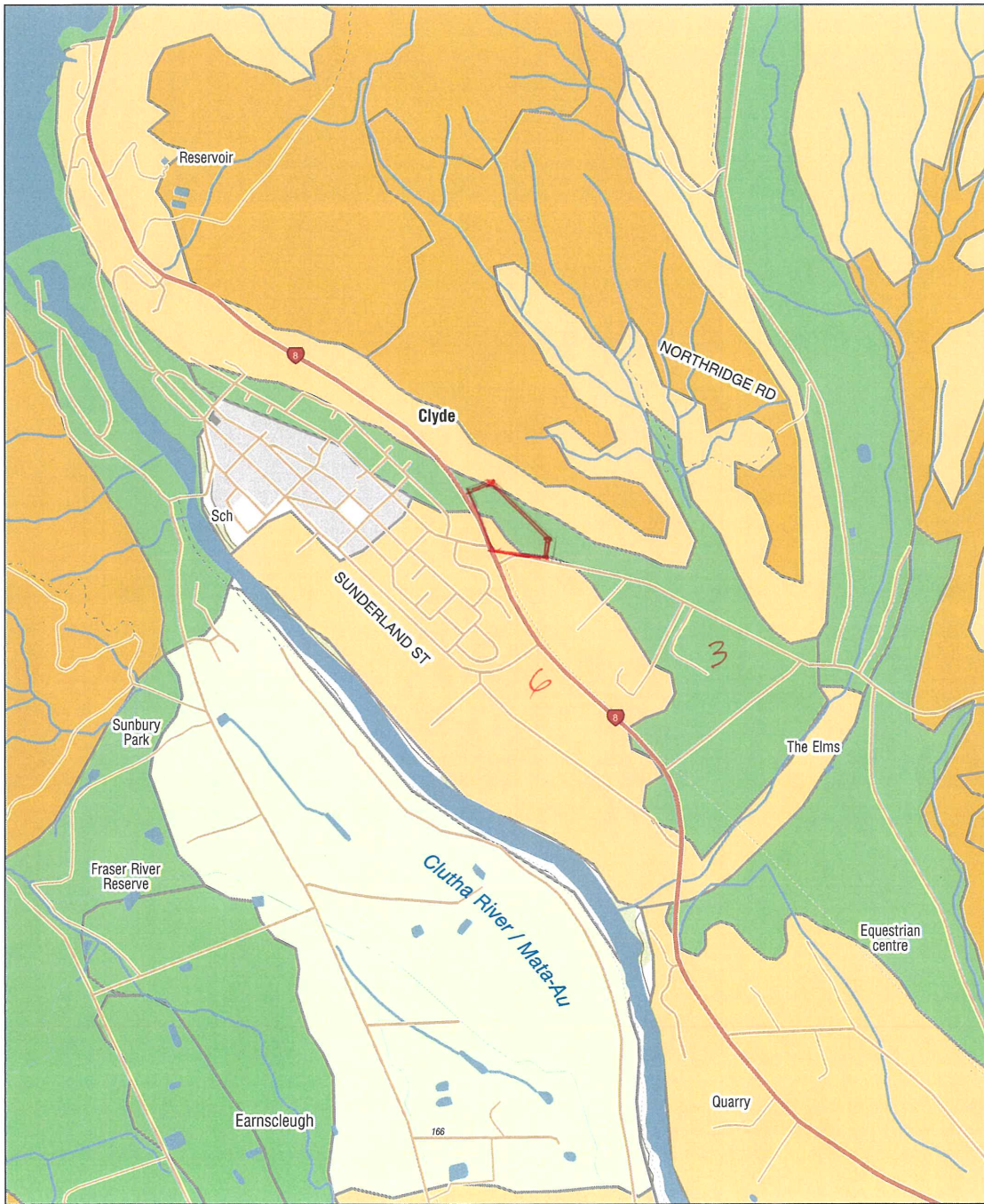


Peter Dymock
B.Sc, Dip Mgt, R.P. Surv, MNZIS, CSNZ
Paterson Pitts Limited Partnership



APPENDIX 1

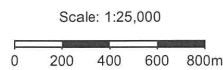
Landcare LUC Mapping



OURENVIROMENT



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Legend

Land Use Capability

-  LUC Class 1
-  LUC Class 2
-  LUC Class 3
-  LUC Class 4
-  LUC Class 5
-  LUC Class 6
-  LUC Class 7
-  LUC Class 8

OURENVIRONMENT



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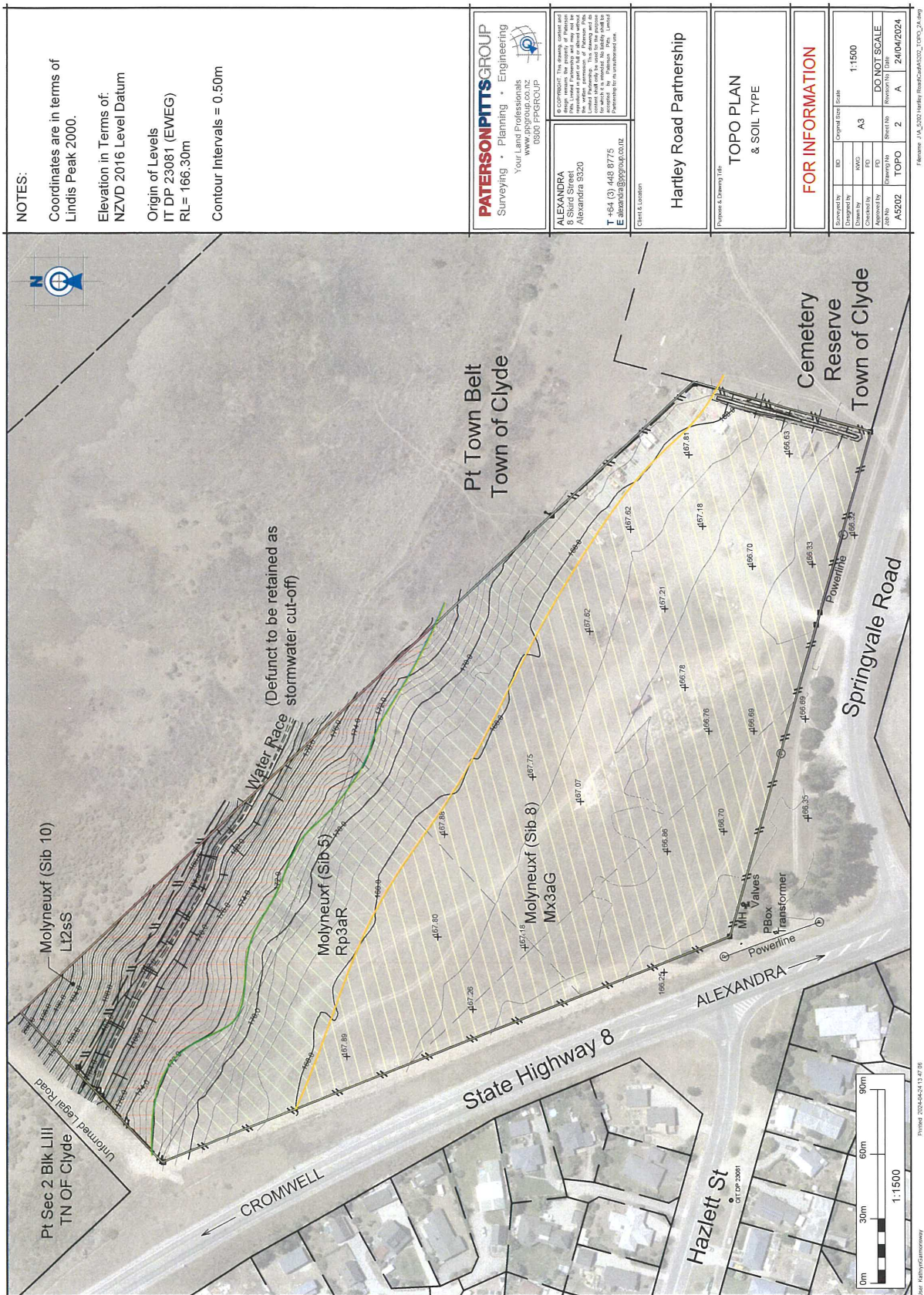
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APPENDIX 2

Topographic Plan & Soil Type Map

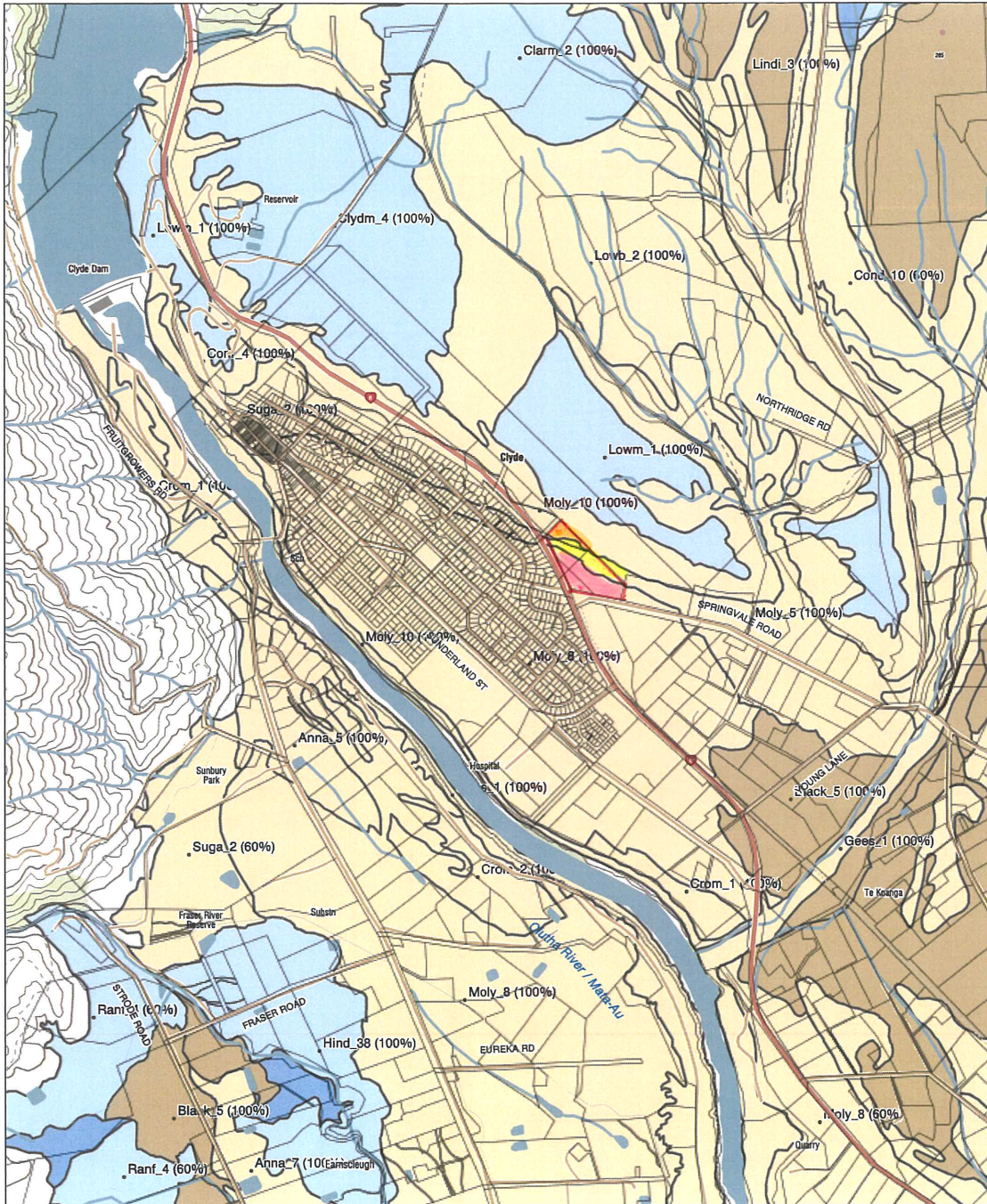




APPENDIX 3

Landcare & ORC Soil Mapping

■ Molyneuxf (S168) ■ Molyneuxf (S155)
■ Molyneuxf (S1610)



S-MAPONLINE



Scale: 1:25,000

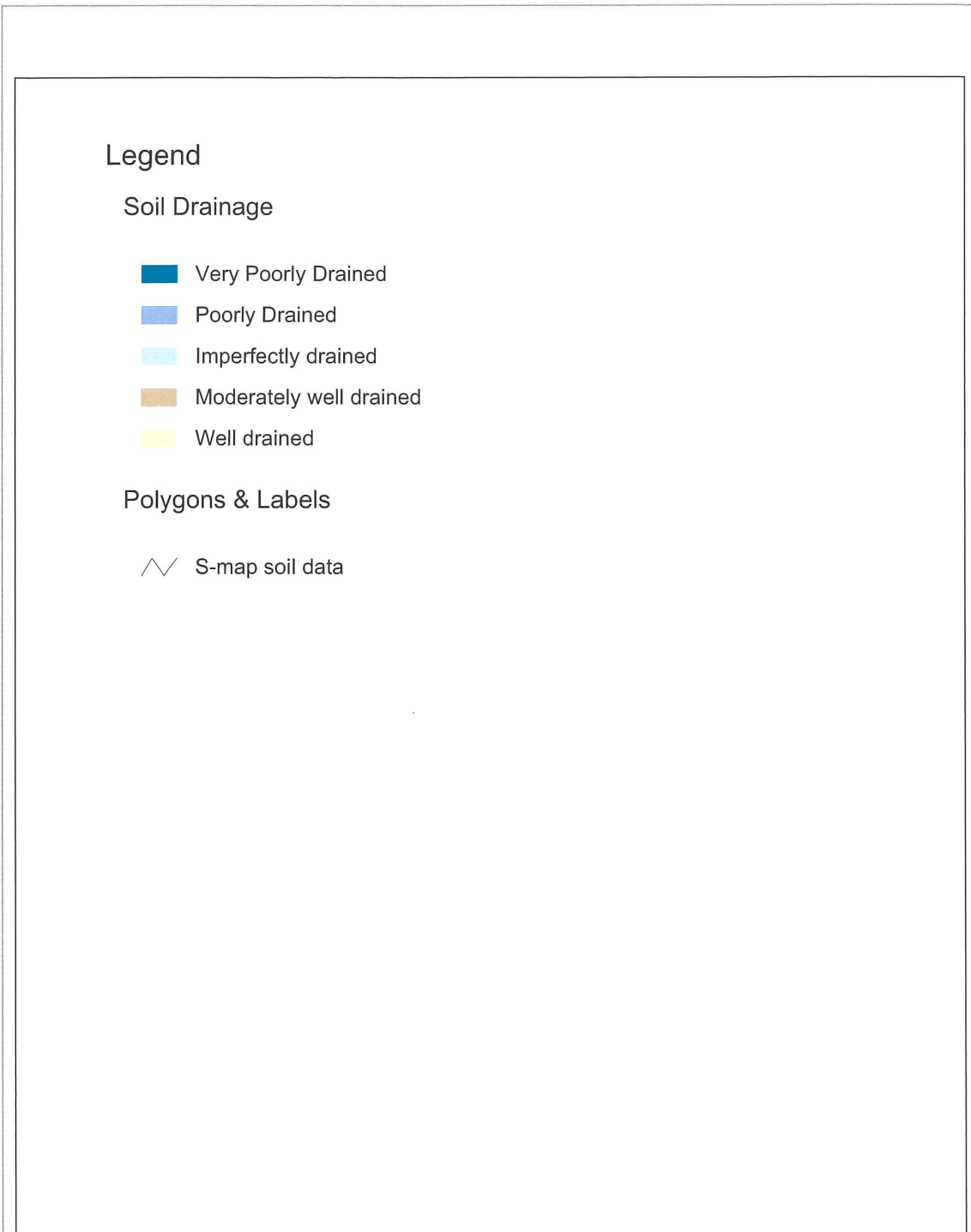


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Printed: 09:42:40 AM Thu, 18 Apr 2024



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4/18/24, 9:52 AM

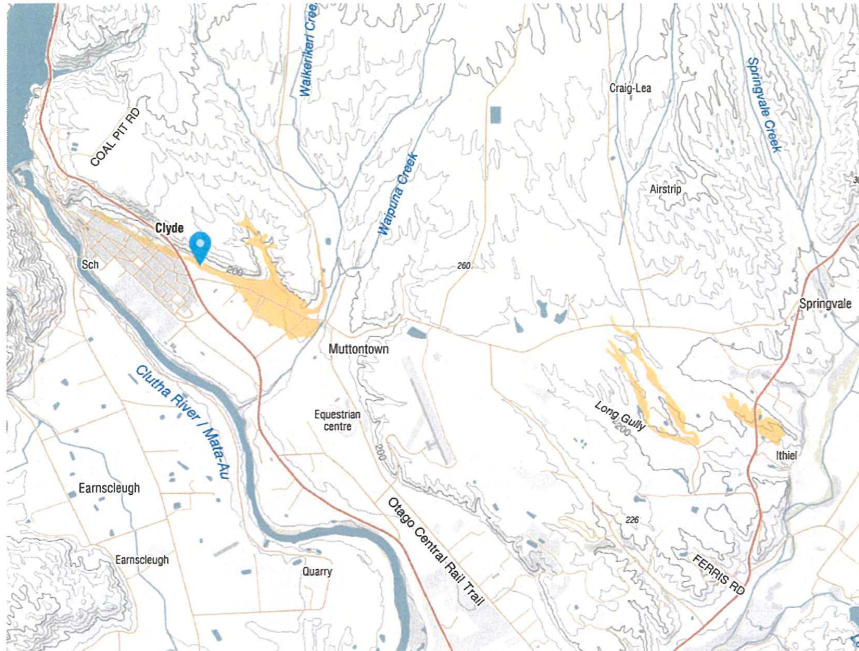
Soil map unit factsheet

Molyneux (Sibs)

Soil map unit factsheet

Report generated: 18/04/2024 from <https://smap.landcareresearch.co.nz/maps-and-tools/app/?gislayer=Otago&soilmapuc=Rp3aR&factsheetType=undefined&siblingNumber=undefined&objectId=undefined&pinCoordinate=1312142.8149154412%2C4989172.7>

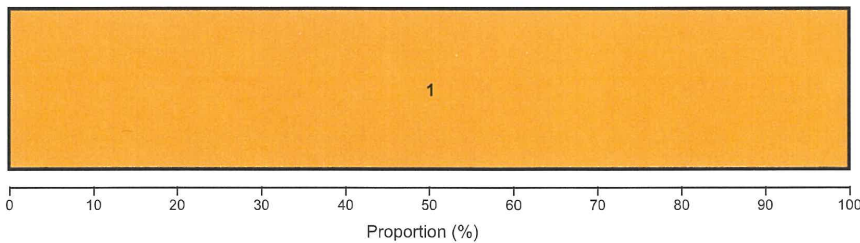
Areas with OtagoRp3aR map unit code are shown on the map below. A soil map unit is a collection of areas that have the same soils (i.e. siblings) in the same proportion.



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Proportion of siblings in this map unit

Graph is coloured according to the NZSC soil order of each sibling within this map unit.



Sibling	Soil Order
1: Molyneux_5a.1 (100%)	Semiarid

Soil properties of the siblings within the soil map unit

This table shows the details of the soil siblings within the map unit. The profile available water (Paw) is a measure of the capacity of the soil sibling to store water to a depth of 1 metre. Click the links below to find out more about each item:

[Soil Order](#), [Drainage Class](#), [Depth Class](#)

No.	Smap name	Proportion (%)	Depth	Texture	Drainage class	PAW (mm)	Order
1	Molyneux_5a.1	100	Very Shallow	sand	Well drained	106.5	Semiarid

Soil Survey

This soil mapunit was mapped within the following soil survey:

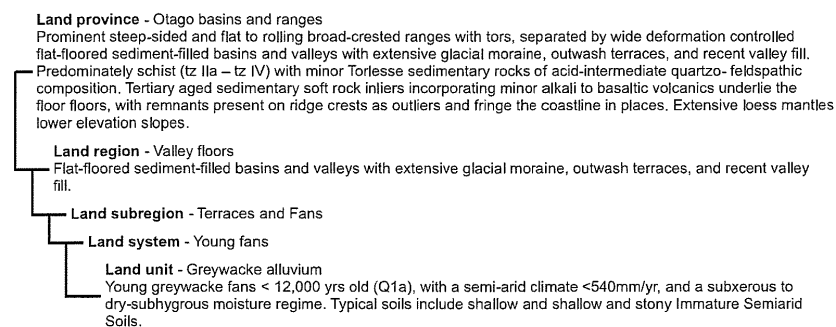
4/18/24, 9:52 AM

Soil map unit factsheet

Survey Title: Grow Otago
Survey Scale: 50000
Survey Date: 2010 to 2014
Origin: legacy update major
Map Unit Delineation Method: Hand-drawn
Map Unit Labelling Method: Observations
Sibling Base Property Classification Method: Observations
Description: Low to moderate predictability, minimal soil observations, or a relatively coarse mapping for the scale of variation.

Landform

The landform tree hierarchy below shows where the selected soil mapunit fits within the wider landscape



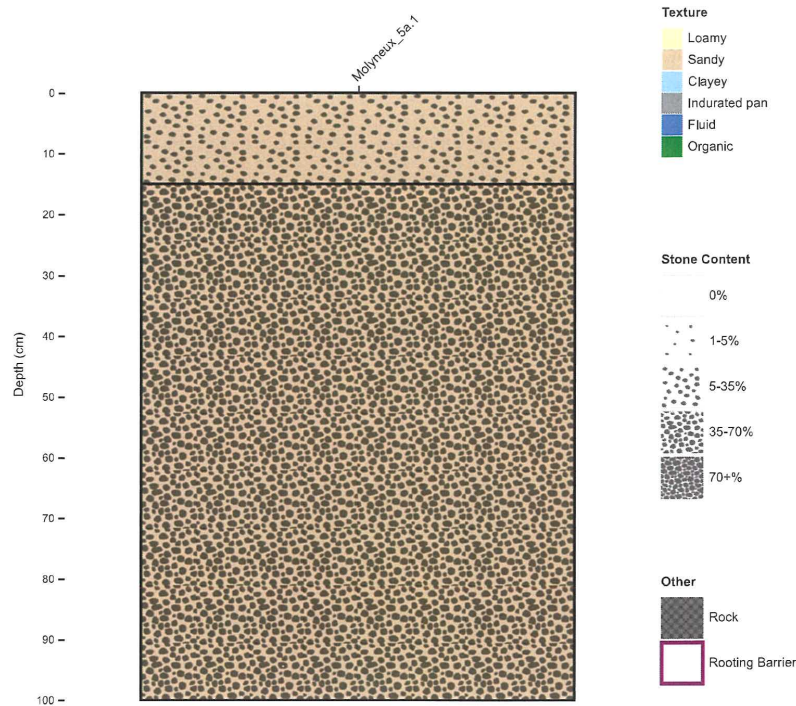
<https://smap.landcareresearch.co.nz/print-soil-map-unit-factsheet/?gislayer=Otago&soilmapuc=Rp3aR&factsheetType=undefined&siblingNumber...> 2/6

4/18/24, 9:52 AM

Soil map unit factsheet

Texture graph

This graph shows the texture profile of the siblings found in the map unit. Each horizon is coloured according to its texture.



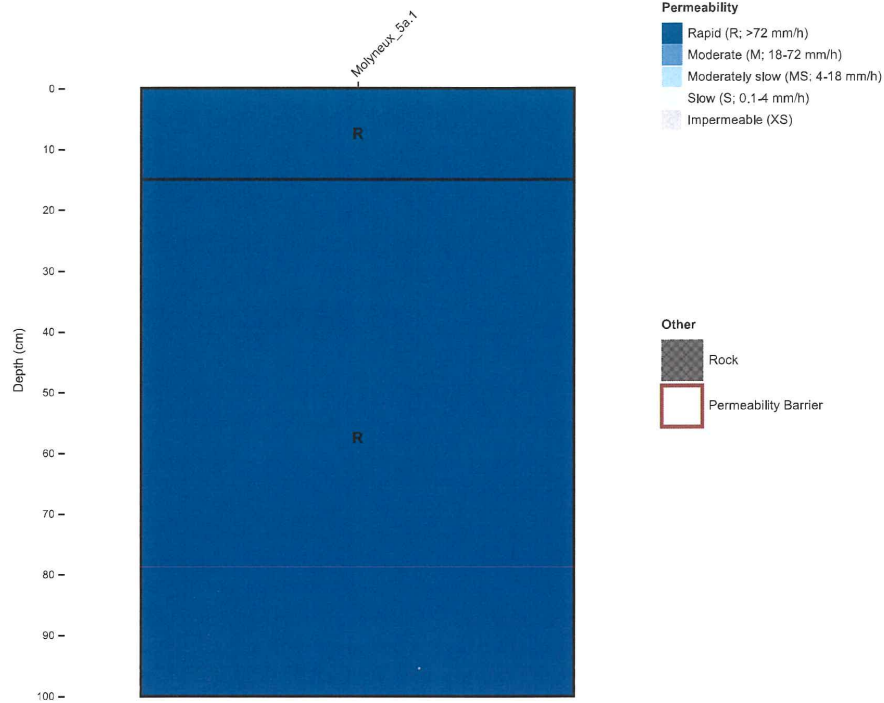
<https://smap.landcareresearch.co.nz/print-soil-map-unit-factsheet/?gislayer=Otago&soilmapuc=Rp3aR&factsheetType=undefined&siblingNumber...> 3/6

4/18/24, 9:52 AM

Soil map unit factsheet

Permeability graph

This graph shows the permeability profile of the siblings found in the map unit. Each horizon is coloured according to its permeability. Click [here](#) for more information on permeability.



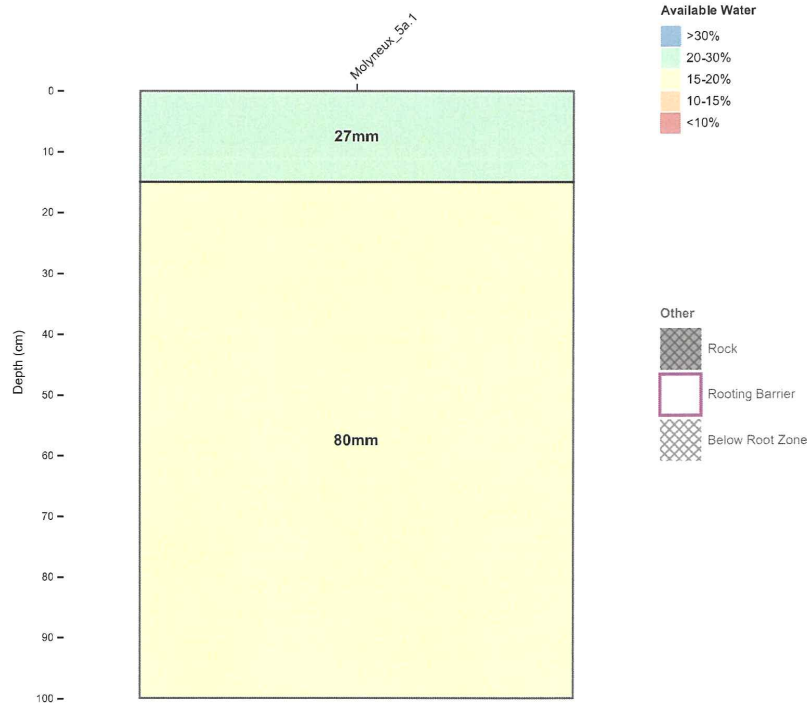
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4/18/24, 9:52 AM

Soil map unit factsheet

Available Water Graph

This graph shows the available water profile of the siblings found in the map unit. This is capacity of the soil to hold water that is available to plants. Each horizon is coloured according to its percent available water content. Click [here](#) for more information on available water.



<https://smap.landcareresearch.co.nz/print-soil-map-unit-factsheet/?gislayer=Otago&soilmapuc=Rp3aR&factsheetType=undefined&siblingNumber...> 5/6

4/18/24, 9:52 AM

Soil map unit factsheet

About this publication

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<https://smap.landcareresearch.co.nz/print-soil-map-unit-factsheet/?gislayer=Otago&soilmapuc=Rp3aR&factsheetType=undefined&siblingNumber...> 6/6

4/18/24, 9:54 AM

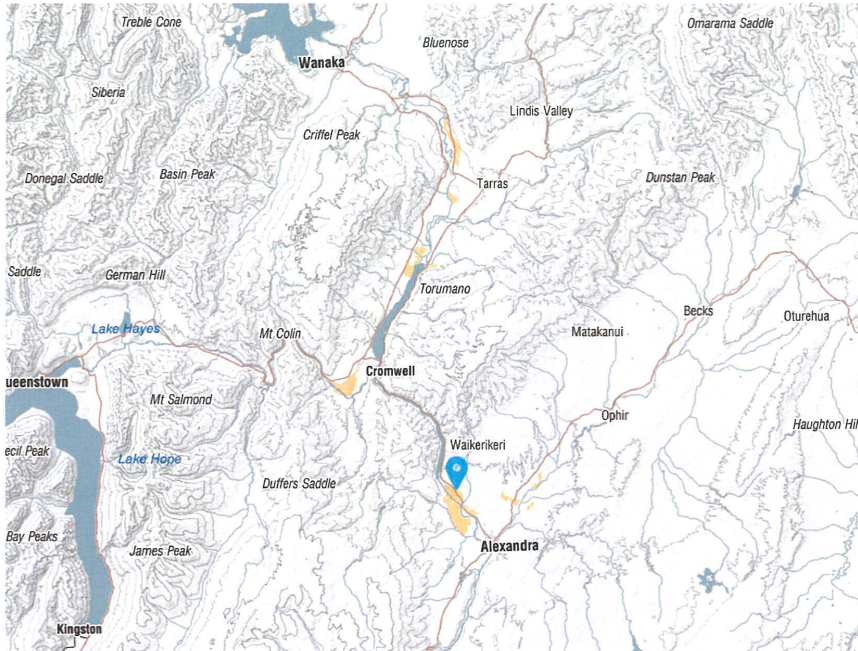
Soil map unit factsheet

Molyneux f (Sib &)

Soil map unit factsheet

Report generated: 18/04/2024 from <https://smap.landcareresearch.co.nz/maps-and-tools/app/?gislayers=Otago&soilmapuc=Mx3aG&factsheetType=undefined&siblingNumber=undefined&objectId=undefined&pinCoordinate=1312104.7349838007%2C4989078.4>

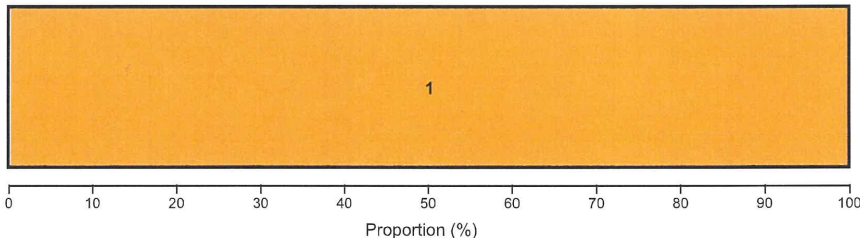
Areas with OtagoMx3aG map unit code are shown on the map below. A soil map unit is a collection of areas that have the same soils (i.e. siblings) in the same proportion.



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Proportion of siblings in this map unit

Graph is coloured according to the NZSC soil order of each sibling within this map unit.



Sibling	Soil Order
1: Molyneux_8a.1 (100%)	 Semiariid

Soil properties of the siblings within the soil map unit

This table shows the details of the soil siblings within the map unit. The profile available water (Paw) is a measure of the capacity of the soil sibling to store water to a depth of 1 metre. Click the links below to find out more about each item:

[Soil Order](#), [Drainage Class](#), [Depth Class](#)

No.	Smap name	Proportion (%)	Depth	Texture	Drainage class	PAW (mm)	Order
1	Molyneux_8a.1	100	Very Shallow	sand	Well drained	86.2	Semiariid

Soil Survey

This soil mapunit was mapped within the following soil survey:

<https://smap.landcareresearch.co.nz/print-soil-map-unit-factsheet/?gislayers=Otago&soilmapuc=Mx3aG&factsheetType=undefined&siblingNumber=...> 1/6

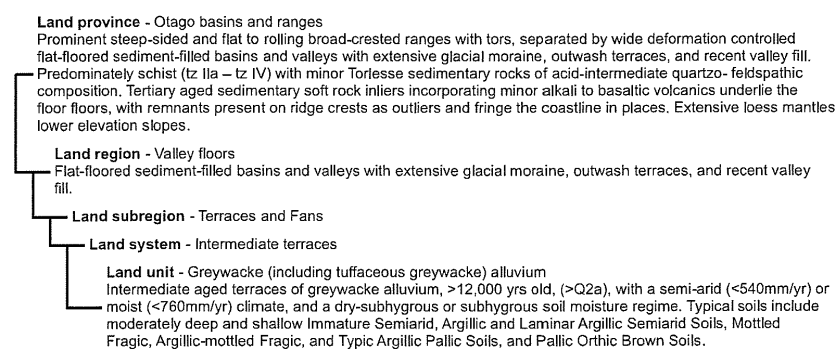
4/18/24, 9:54 AM

Soil map unit factsheet

Survey Title: Grow Otago
Survey Scale: 50000
Survey Date: 2010 to 2014
Origin: legacy update major
Map Unit Delineation Method: Hand-drawn
Map Unit Labelling Method: Observations
Sibling Base Property Classification Method: Observations
Description: Low to moderate predictability, minimal soil observations, or a relatively coarse mapping for the scale of variation.

Landform

The landform tree hierarchy below shows where the selected soil mapunit fits within the wider landscape



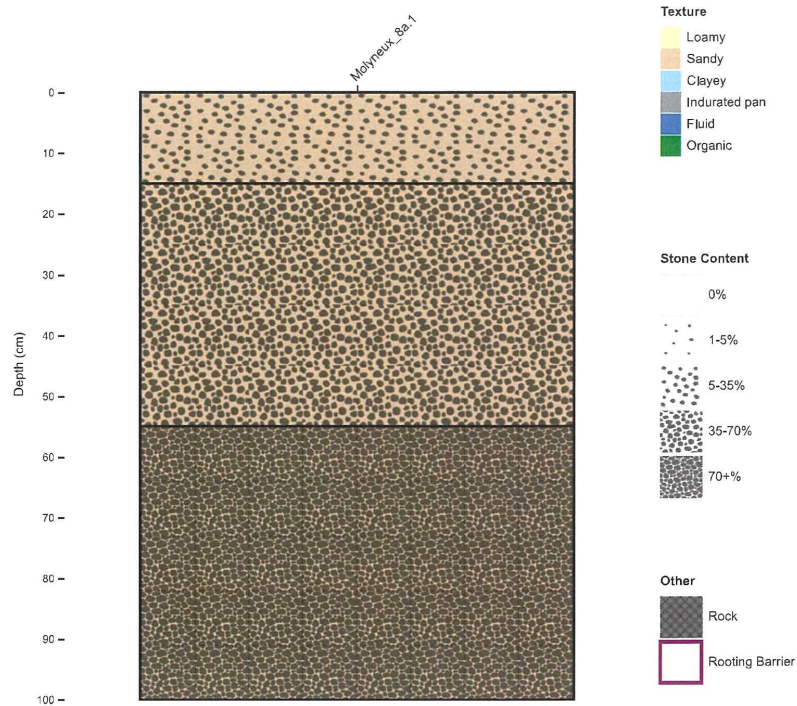
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4/18/24, 9:54 AM

Soil map unit factsheet

Texture graph

This graph shows the texture profile of the siblings found in the map unit. Each horizon is coloured according to its texture.

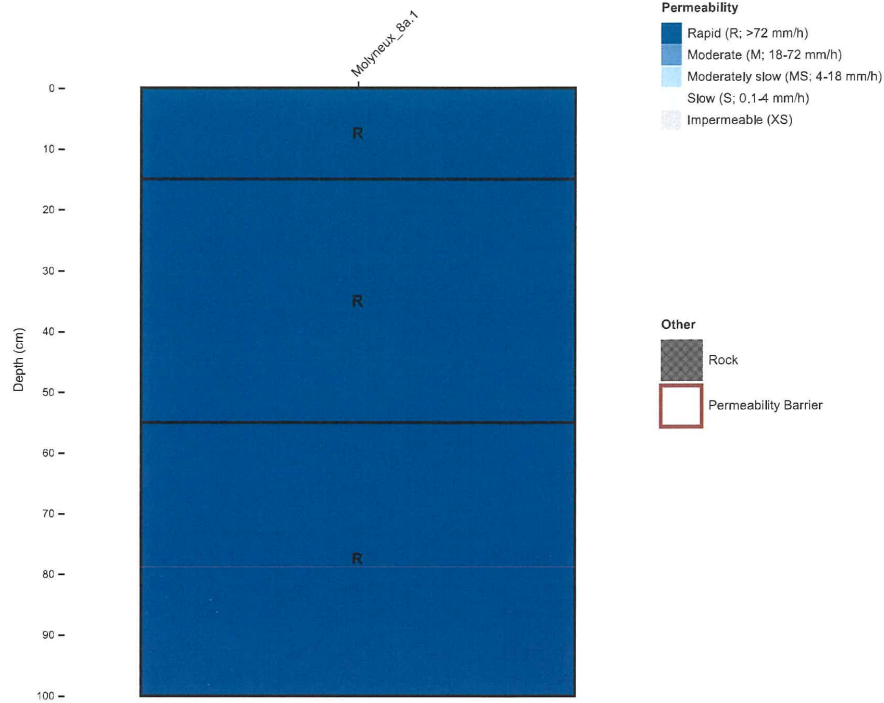


4/18/24, 9:54 AM

Soil map unit factsheet

Permeability graph

This graph shows the permeability profile of the siblings found in the map unit. Each horizon is coloured according to its permeability. Click [here](#) for more information on permeability.

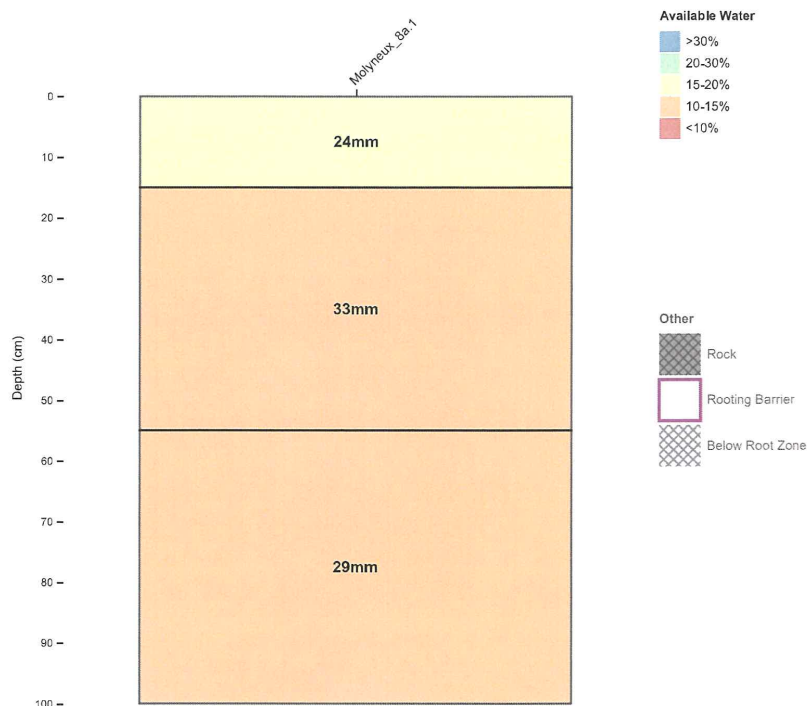


4/18/24, 9:54 AM

Soil map unit factsheet

Available Water Graph

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4/18/24, 9:54 AM

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<https://smap.landcareresearch.co.nz/print-soil-map-unit-factsheet/?gislayer=Otago&soilmapuc=Mx3aG&factsheetType=undefined&siblingNumbe...> 6/6

4/18/24, 9:49 AM

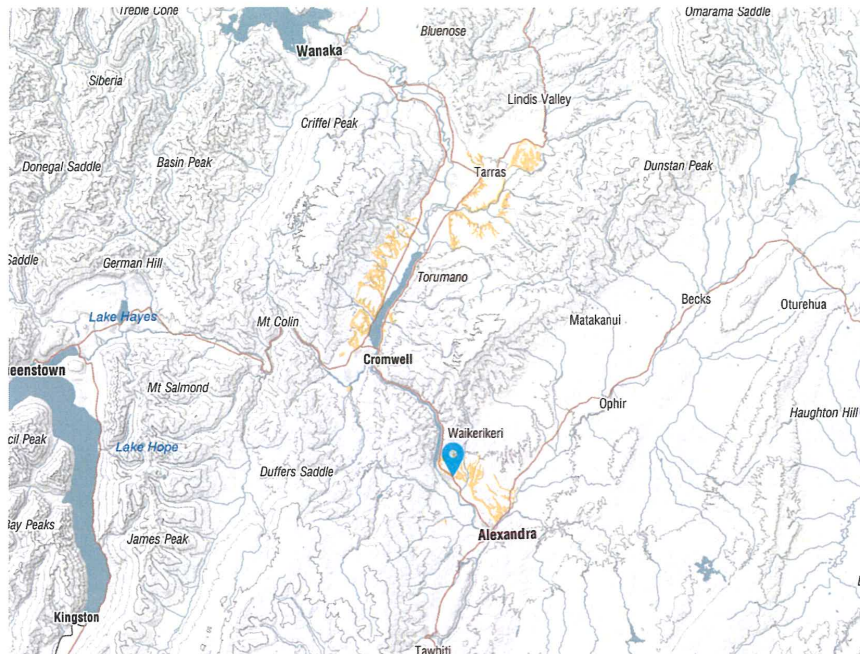
Soil map unit factsheet

Molyneux f (Sib10)

Soil map unit factsheet

Report generated: 18/04/2024 from <https://smap.landcareresearch.co.nz/maps-and-tools/app/?gislayer=Otago&soilmapuc=Lt2sS&factsheetType=undefined&siblingNumber=undefined&objectId=undefined&pinCoordinate=1311992.7349838007%2C4989338.51>

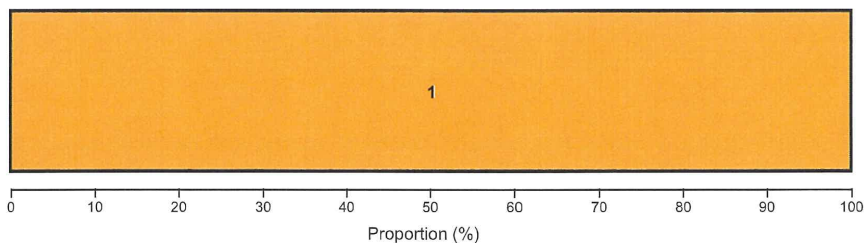
Areas with Otago/Lt2sS map unit code are shown on the map below. A soil map unit is a collection of areas that have the same soils (i.e. siblings) in the same proportion.



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Proportion of siblings in this map unit

Graph is coloured according to the NZSC soil order of each sibling within this map unit.



Sibling	Soil Order
1: Molyneux_10a.1 (100%)	Semiarid

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[Soil Order](#), [Drainage Class](#), [Depth Class](#)

No.	Soil name	Proportion (%)	Depth	Texture	Drainage class	PAW (mm)	Order
1	Molyneux_10a.1	100	Shallow	sand	Well drained	78.6	Semiarid

Soil Survey

This soil mapunit was mapped within the following soil survey:

<https://smap.landcareresearch.co.nz/print-soil-map-unit-factsheet/?gislayer=Otago&soilmapuc=Lt2sS&factsheetType=undefined&siblingNumber=...> 1/6

4/18/24, 9:49 AM

Soil map unit factsheet

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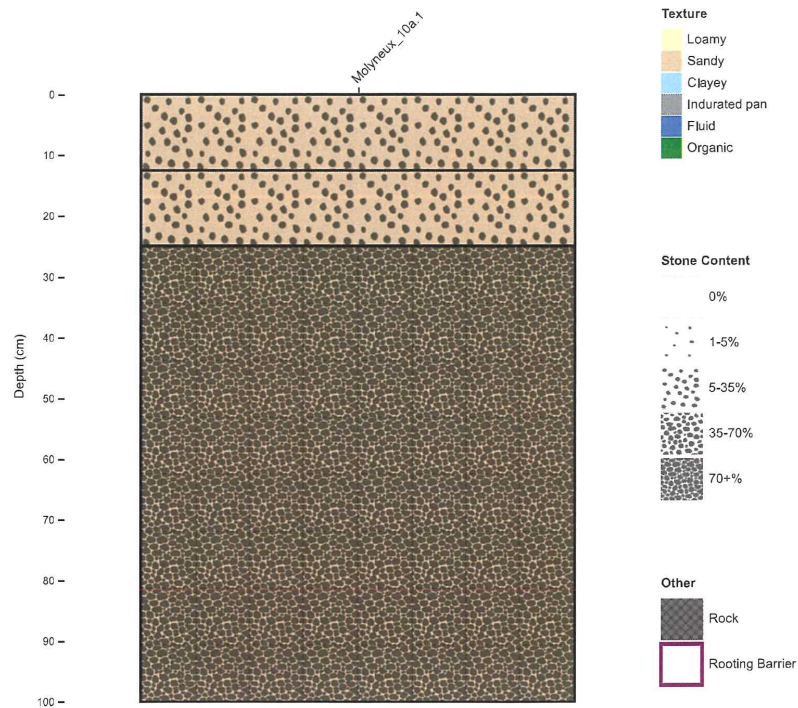
<https://smap.landcareresearch.co.nz/print-soil-map-unit-factsheet/?gislayer=Otago&soilmapuc=Lt2sS&factsheetType=undefined&siblingNumber=...> 2/6

4/18/24, 9:49 AM

Soil map unit factsheet

Texture graph

This graph shows the texture profile of the siblings found in the map unit. Each horizon is coloured according to its texture.



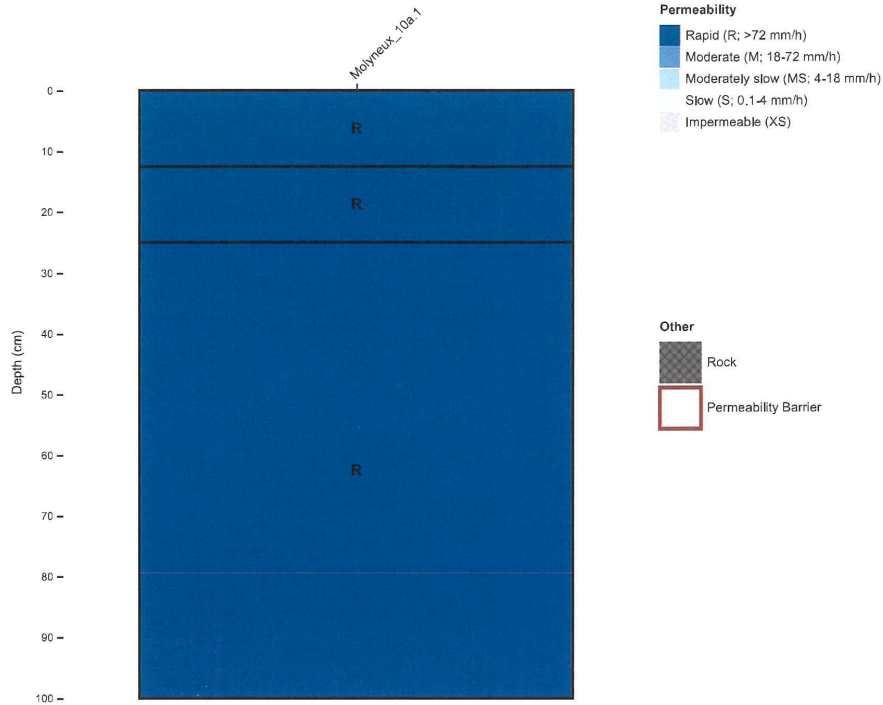
<https://smap.landcareresearch.co.nz/print-soil-map-unit-factsheet/?gislayer=Otago&soilmapuc=Lt2sS&factsheetType=undefined&siblingNumber=...> 3/6

4/18/24, 9:49 AM

Soil map unit factsheet

Permeability graph

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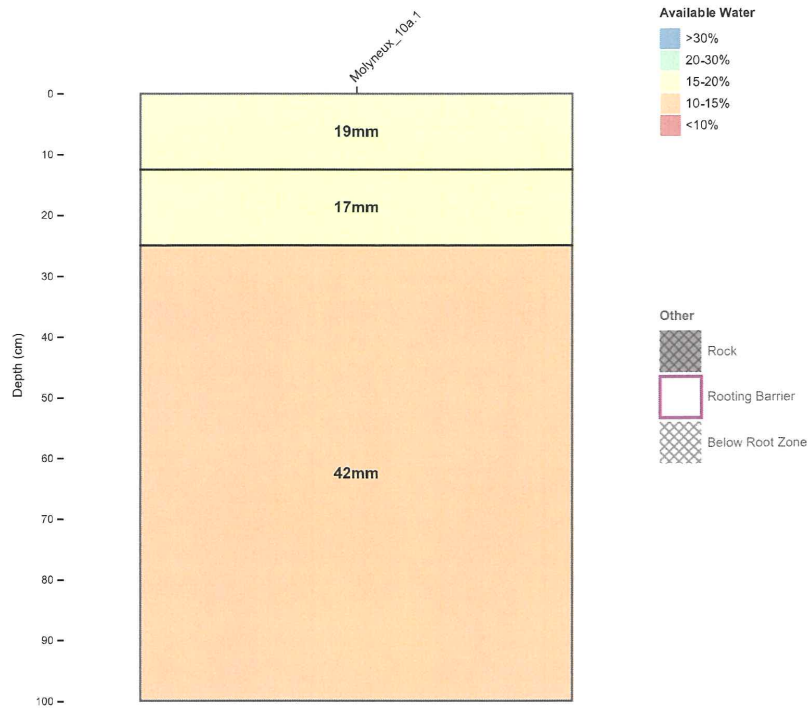


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Soil map unit factsheet

Available Water Graph

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<https://smap.landcareresearch.co.nz/print-soil-map-unit-factsheet/?gislayer=Otago&soilmapuc=Lt2sS&factsheetType=undefined&siblingNumber=...> 6/6

Otago Maps Soils



Service Layer Credits: Eagle Technology, Land Information New Zealand, Otago Regional Council

□ Semiarid soils



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GrowOtago

Soil Type Codes

This Help page shows how to interpret the **GrowOtago** Maps soil codes.

The colours on the soil map show the first two levels, Order and Group, of the New Zealand Soil Classification (NZSC) (Hewitt 1998 Landcare Research Science Series No. 1)

The next section shows how the lowland codes are constructed. The subsequent sections list the codes, both lowland and upland.

Interpreting Lowland Soils Codes

Example: Gd0sU^M

Series	Gd	Gladbrook
Depth	0	deep
Texture	s	sandy loam
Slope	U	undulating
Phase	^M	mottled phase

Gd0sU^M = Gladbrook deep sandy loam, undulating, mottled phase

Depth

0	>90cm	deep
1	45-90cm	moderately deep
2	20-45cm	shallow
3	10-20cm	stony
4	<10cm	very stony

Texture

a	sand
b	loamy sand
b/a	loamy sand on sand
b/z	loamy sand on silt loam
c	clay loam
c/d	clay loam on silty clay
d	silty clay
d/a	silty clay on sand
d/b	silty clay on loamy sand
d/c	silty clay on clay loam
d/s	silty clay on sandy loam
d/z	silty clay on silt loam
e	clay
f	fine sandy loam
f/a	fine sandy loam on sand
f/c	fine sandy loam on clay loam

f/p	fine sandy loam on peaty loam
f/s	fine sandy loam on sandy loam
f/z	fine sandy loam on silt loam
o	peat
o/b	peat over loamy sand
o/d	peat over silty clay
o/f	peat over fine sandy loam
o/p	peat over peaty loam
p	peaty loam
p/c	peaty loam over clay loam
p/d	peaty loam silty clay
p/s	peaty loam over sandy loam
p/z	peaty loam over silt loam
q	loamy peat
q/z	peaty loam over silt loam
r/a	slight peaty clay loam on sand
r/b	slight peaty clay loam on loamy sand
r/z	slight peaty clay loam on silt loam
s	sandy loam
s/a	sandy loam on sand
s/c	sandy loam on clay loam
s/z	sandy loam on silt loam
y	loamy silt
y/a	loamy silt on sand
y/b	loamy silt on loamy sand
y/d	loamy silt on silty clay
y/o	loamy silt on peat
z	silt loam
z/a	silt loam on sand
z/b	silt loam on loamy sand
z/c	silt loam on clay loam
z/d	silt loam on silty clay
z/e	silt loam on clay
z/f	silt loam on fine sandy loam
z/o	silt loam on peat
z/p	silt loam on peaty loam
z/s	silt loam on sandy loam
z/y	silt loam on loamy silt
Slope	
G	0-3° gently undulating
H	16-25° hilly
R	8-15° rolling
S	>25° steep
U	4-7° undulating
Phase	
B	bouldery phase
BM	"bouldery, mottled phase"
C	complex
D	disturbed variant

E	eroded variant
G	strongly gleyed variant
J	argillic variant
JM	argillic mottled variant
M	mottled phase
MX	"mottled, weakly saline phase"
MXX	"mottled, moderately saline phase"
P	peaty phase
T	thickened topsoil variant
U	undifferentiated
W	raw variant
X	weakly saline phase
Y	moderately saline phase
Z	strongly saline phase

Lowland Codes

Ab	Abbotsford
Ac	Arcadia
Ad	Ardlussa
Ae	Andrews
Ai	Airedale
Aj	Ardlui
Ak	Akatore
An	Annan
Ao	Arrow
Ar	Arthurton
As	Ainsley
At	Athol
Au	Ardgour
Aw	Awamoko
Ax	Alexandra
Bb	Bannockburn
Bc	Blackmans
Bd	Bendigo
Be	Becks
Beach	Beach
Bi	Bickerstaff
Bk	Brassknocker
Bl	Blackstone
Bn	Benio
Bo	Bortons
Br	Brighton
Bs	Brookstead
Bt	Bungtown
Bw	Berwick
By	Broad Bay
Ca	Charlton
Cb	Camphill-Beck
Cc	Conical Hill

Cd	Cluden
Ce	Carrick
Cf	Chalmers
Cg	Cargill
Ch	Chatto
Ck	Crookston
Cl	Clare
Cm	Claremont
Cn	Clinton
Co	Conroy
Cp	Camphill
Cq	Chapman
Cr	Craigdale
Cs	Chasm
Ct	Chatton
Cu	Clutha
Cv	Clydevale
Cw	Cromwell
Cx	Conroy-Becks
Cy	Clyde
D	Disturbed
Db	Drybread
Dd	Dunedin
Di	Diamond
Dk	Dukes
DI	Darnley
Dn	Dunstan
Dp	Dip
Dt	Dart
Ed	Eden
Ee	Eely
Ef	Enfield
El	Earnsclough

Em	Tima
En	Earnslaw
Estuary	Estuary
Ev	Evansdale
Ew	Eweburn
Ey	Eyre
Fd	Fereday
Fk	Frankton
Fm	Fleming
Fr	Ferndale
Fs	Fraser
Ft	Felton
Gb	Gibbston
Gd	Gladbrook
Gf	Greenfield
Gh	Glenlea
Gi	Glenfield
Gl	Glasnevin
Gn	Glenure
Gr	German
Gt	Georgetown
Gv	Glenavy
Gw	Galloway
Gy	Glenorchy
Ha	Hakataramea
Hc	Harbour Cone
Hf	Hatfield
Hg	Hogburn
Hi	Highcliff
Hk	Hokonui
Ho	Hillock
Hs	Hawksburn
Hu	Hurunui
Hy	Henley
Id	Idaburn
Ja	Janefield
Jn	Jacobstown
Ka	Kauru
Kb	Kaimata
Kc	Kuri
Ke	Kiteroa
Kg	Kaitangata
Kh	Kaihiku
Ki	Koinga
Kk	Kakahu
Kl	Kilmarnock
Km	Komako
Ko	Koau
Kp	Kaherekoau
Kr	Kairaki

Ks	Cass
Ku	Kuriwao
Kw	Kaiwera
La	Landon
Lake	Lake
Lb	Linnburn
Lc	Lochar
Ld	Landslip
Le	Leith
Lh	Lindis
Li	Lintley
Ll	Lammerlaw
Ln	Longridge
Ls	Lismore
Lt	Letts
Lu	Luggate
Lw	Lowburn
Ma	Mataura
Mb	Maude
Md	Middlemarch
Me	Mandeville
Mf	Mayfield
Mg	Maungatua
Mi	Matukituki
Mk	Makarewa
Mm	Momona
Mn	Matakanui
Mp	Mihiwaka
Mq	Motukarara
Mr	Matarae
Ms	Mt Mistake
Mt	Matau
Mu	Manuherikia
Mw	Maungawera
Mx	Molyneux
My	Mt Misery
Nb	Naseby
Nd	Narrowdale
Np	Ngapara
Nt	Nithdale
Oa	Oamaru
Oc	Otakou
Od	Omeo
Oe	Oreti
Ok	Otokia
Om	Otama
On	Otanomomo
Op	Opuha
Or	Otarara
Os	Okia

Ot	Otikerama
Ou	Oturehua
Ow	Mine workings
Pa	Papakaio
Pb	Portobello
Pd	Paradise
Pe	Pukeawa
Pf	Parata
Pg	Pigburn
Pi	Purakanui
Pj	Pinelheugh
Pk	Pukeuri
Pm	Pomahaka
Po	Patearoa
Pond	Pond
Pq	Pukerangi
Pr	Paerau
Ps	Porteous
Pt	Paretai
Pu	Pukerau
Pv	Puerua
Qi	Quion
Qn	Queenstown
QU	Quarry
RB	Riverbed
Rb	Roseberry
Re	Rees
Rf	Ranfurly
Rg	Rangitata
Ri	Riversdale
Rk	Rakaia
Rp	Ripponvale
Rw	Rapuwai
RX	Rock outcrop
Sa	Saddle
Sb	Sowburn
Sc	Scotland Poin
Sh	Shotover
Si	Stirling
Sl	Selwyn
Sn	Struan
Sp	Spottis
St	Steward
Sv	Springvale
Sw	Swinburn
Ta	Te-Aneraki
Tc	Taiko
Td	Tokoiti

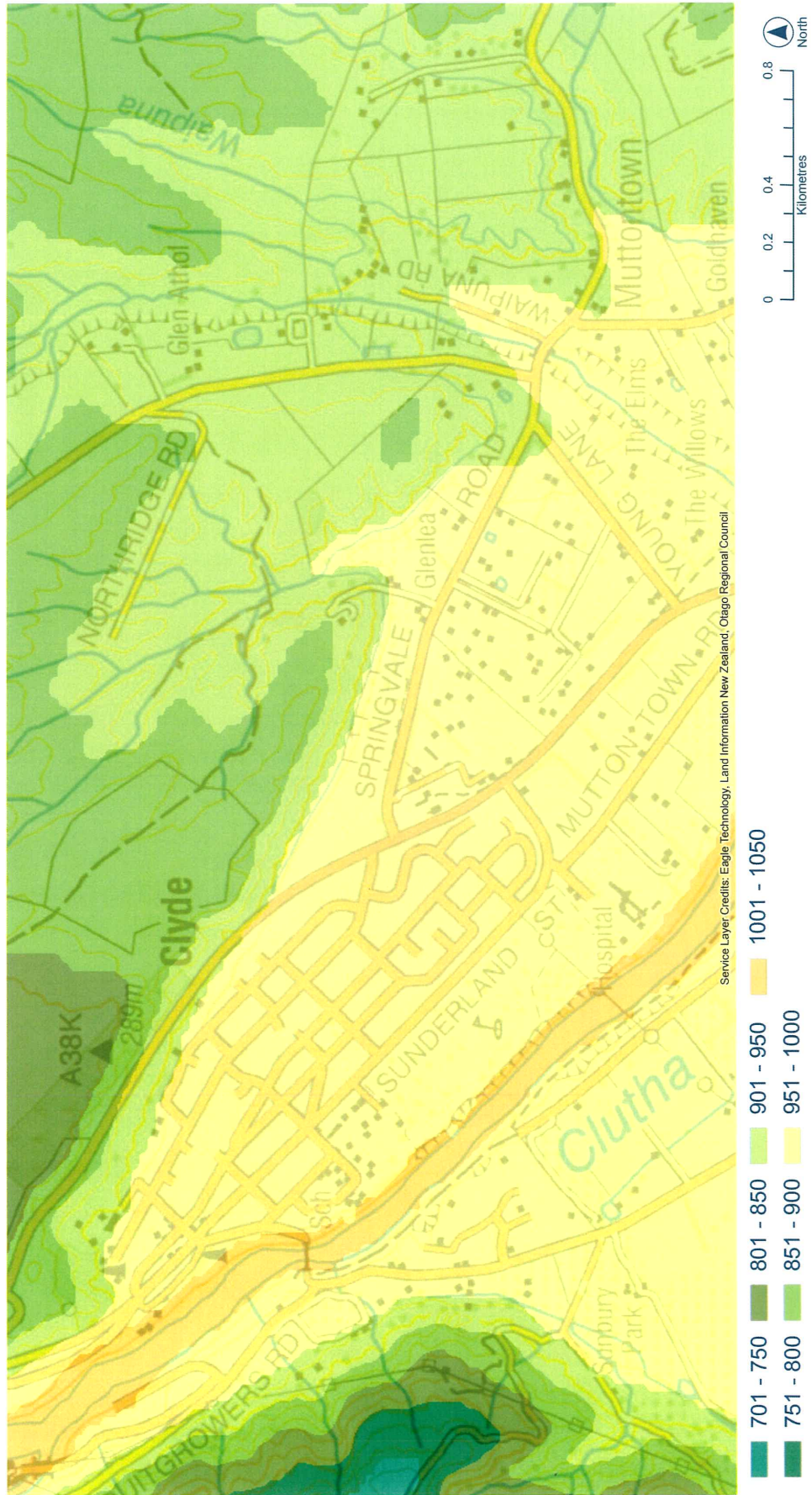
Te	Templeton
Tf	Tuapeka
Tg	Tengawai
Th	Te Houka
Ti	Timaru
Tj	Tomahawk
Tk	Tokomairiro
Tl	Tailings
Tm	Temuka
Tn	Tirohanga
To	Tiroiti
Tp	Titipua
Tq	Taratu
Tr	Tokarahi
Ts	Tarras
Tt	Taitapu
Tu	Tuakitoto
Tv	Teviot
Tw	Tawhiti
Tx	Trotter
Ty	Taieri
Tz	Takitao
Urban	Urban
Ux	Uxbridge
Ve	Venlaw
Wa	Waimakariri
Wb	Wetherburn
Wc	Wanaka
We	Wendon
Wf	Wickliffe
Wg	Wingatui
Wh	Waikakahi
Wj	Wangaloa
Wk	Wakanui
Wn	Waenga
Wp	Wakatipu
Wq	Waikoikoi
Wr	Warepa
Wt	Wetherston
Wu	Waitahuna
Wx	Waikaka
Wy	Waikarara
Ya	Waitati
Yh	Wehenga
Yk	Waiareka
Yp	Waipori
Yt	Waitohi



APPENDIX 4

Grow Otago Extracts

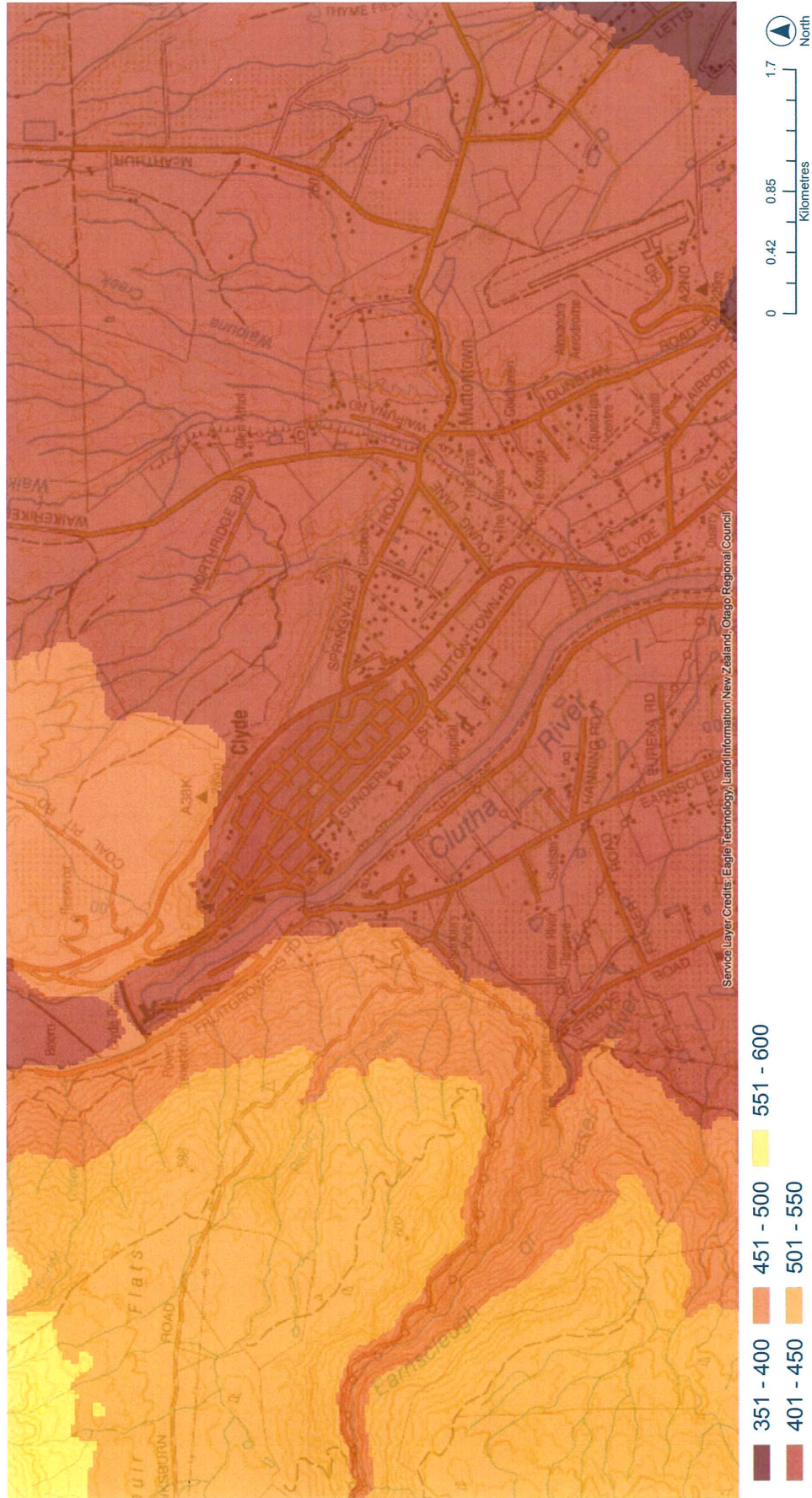
Otago Maps *950 (10c base)*



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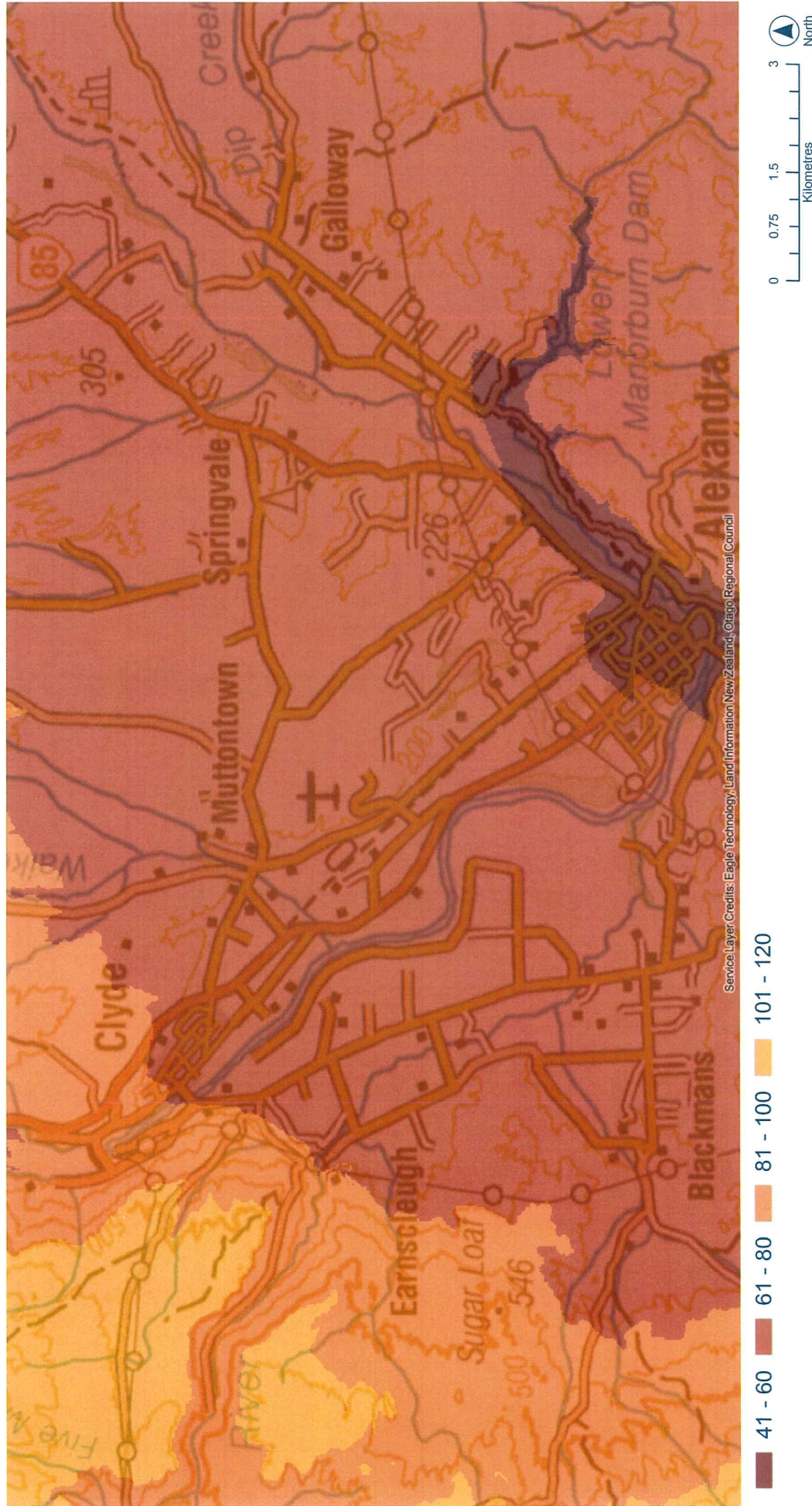
Otago Maps

Median Annual Rain fall



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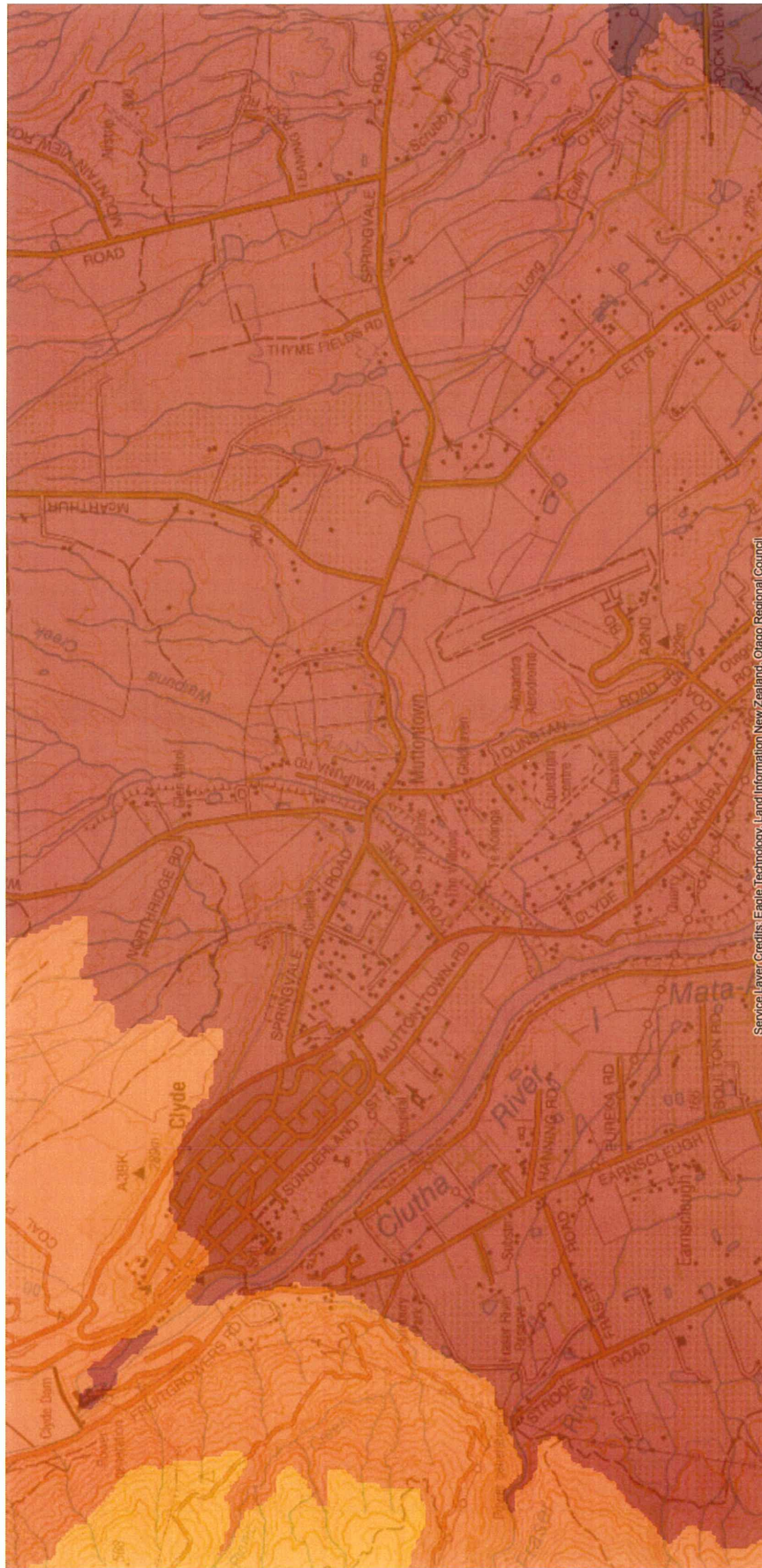
Otago Maps *Dry Summer Rain-fall*



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Otago Maps

Median Summer Rain-fall

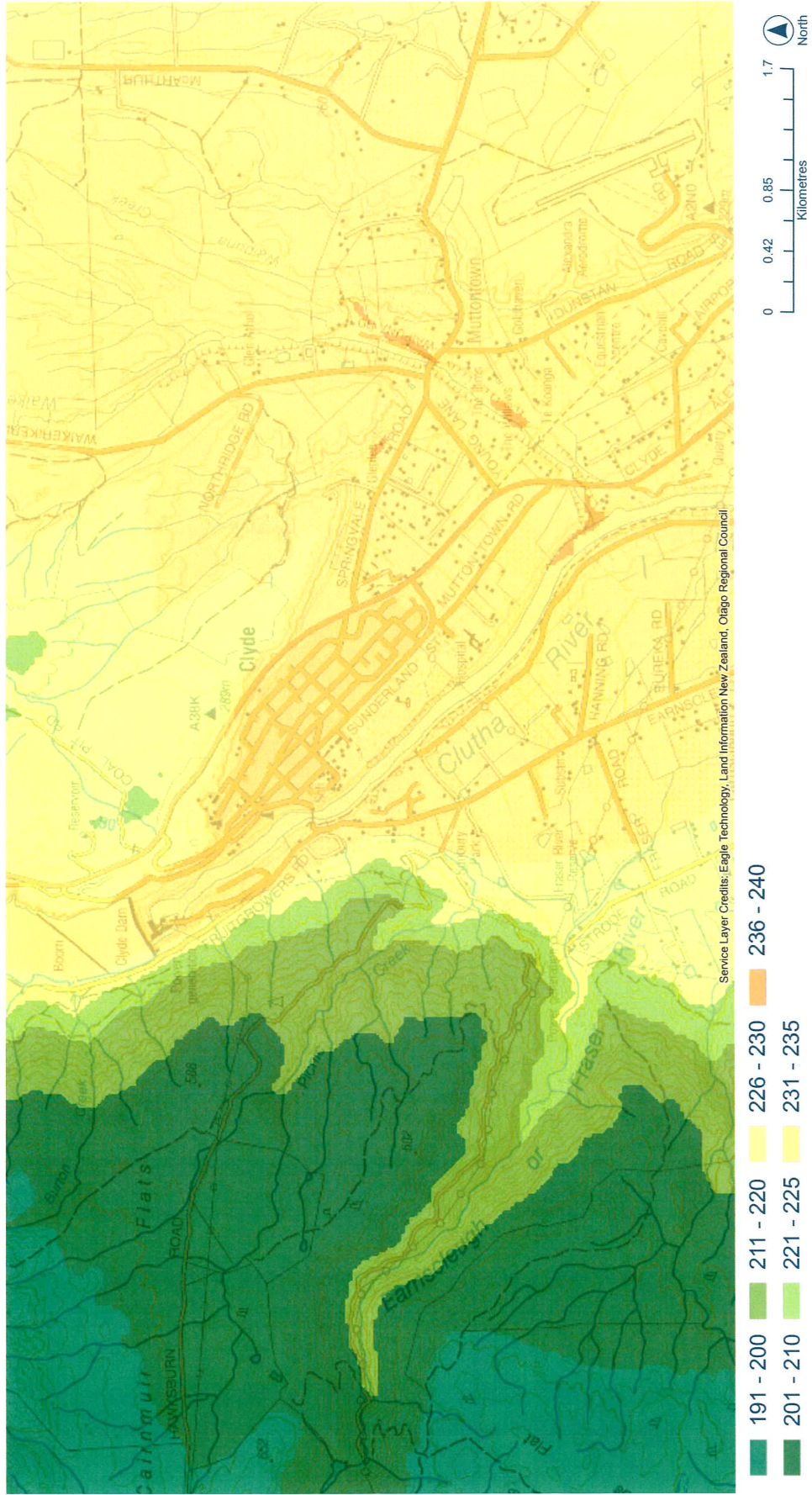


Service Layer Credits: Eagle Technology, Land Information New Zealand, Otago Regional Council

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Otago Maps

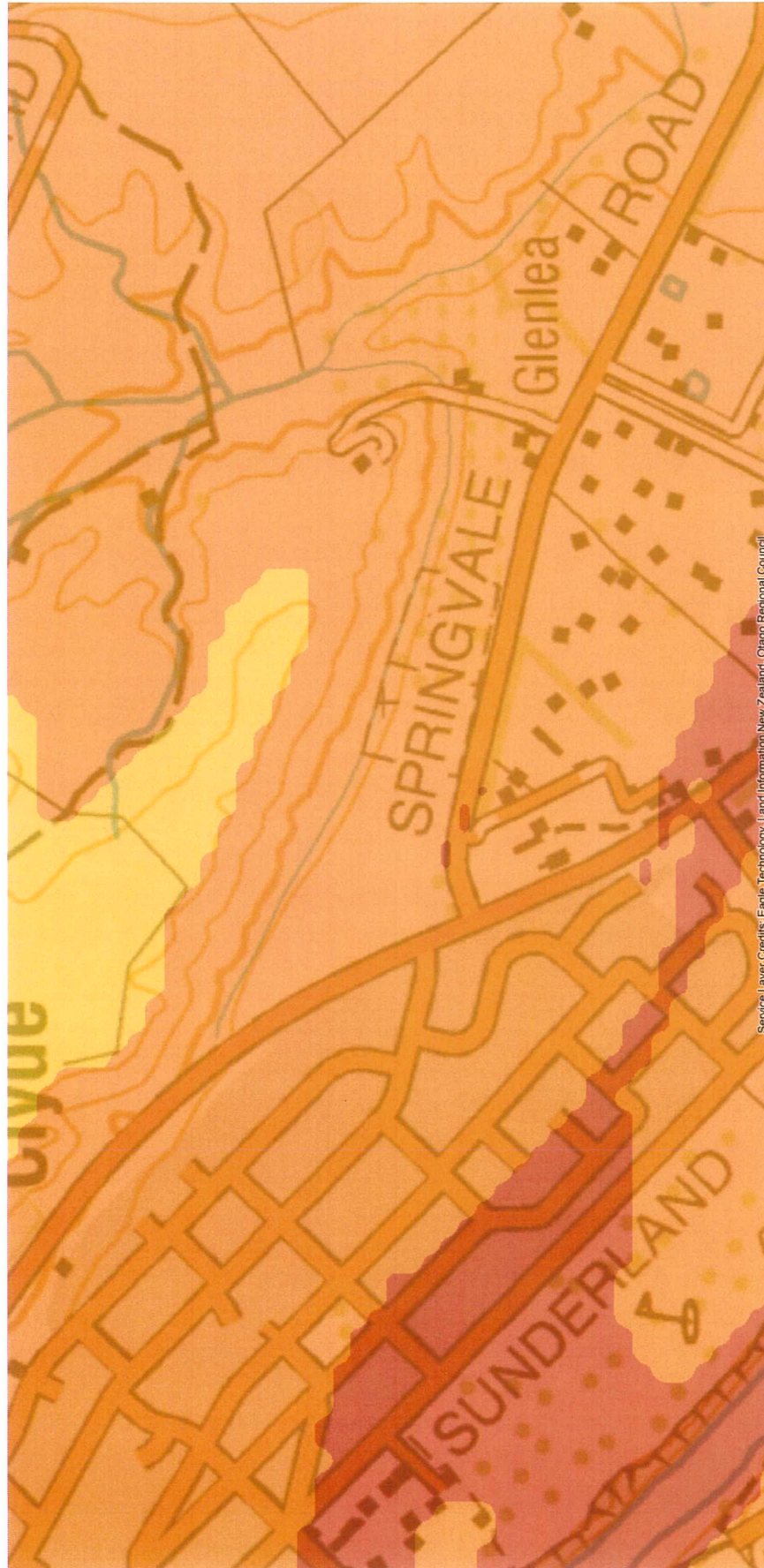
*Median Potential Evapotranspiration
(Nov-Dec)*



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Otago Maps

*Median Potential Evapotranspiration
(Jan - Feb)*



201 - 205 206 - 210 211 - 215

0 0.1 0.2 0.4
Kilometres
North

Information on this map may not be used for the purposes of any legal disputes. The user should independently verify the accuracy of any information before taking any action in reliance upon it. This map was generated for A4 printing on 22/04/2024 at the scale of 1:50,000.



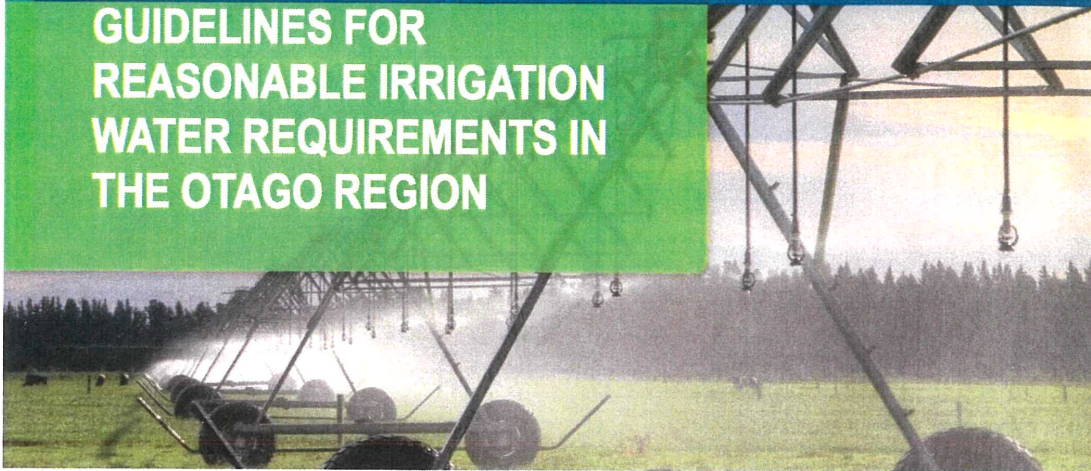
APPENDIX 5

Aqualinc Report extracts and Irrigation Calculator

AQUALINC

Irrigation REPORT

**GUIDELINES FOR
REASONABLE IRRIGATION
WATER REQUIREMENTS IN
THE OTAGO REGION**



**PREPARED FOR
Otago Regional Council**

C15000

2017/07/24

PREPARED BY
Ian McIndoe
Peter Brown
Channa Rajanayaka
Birendra K.C.

www.aqualinc.com

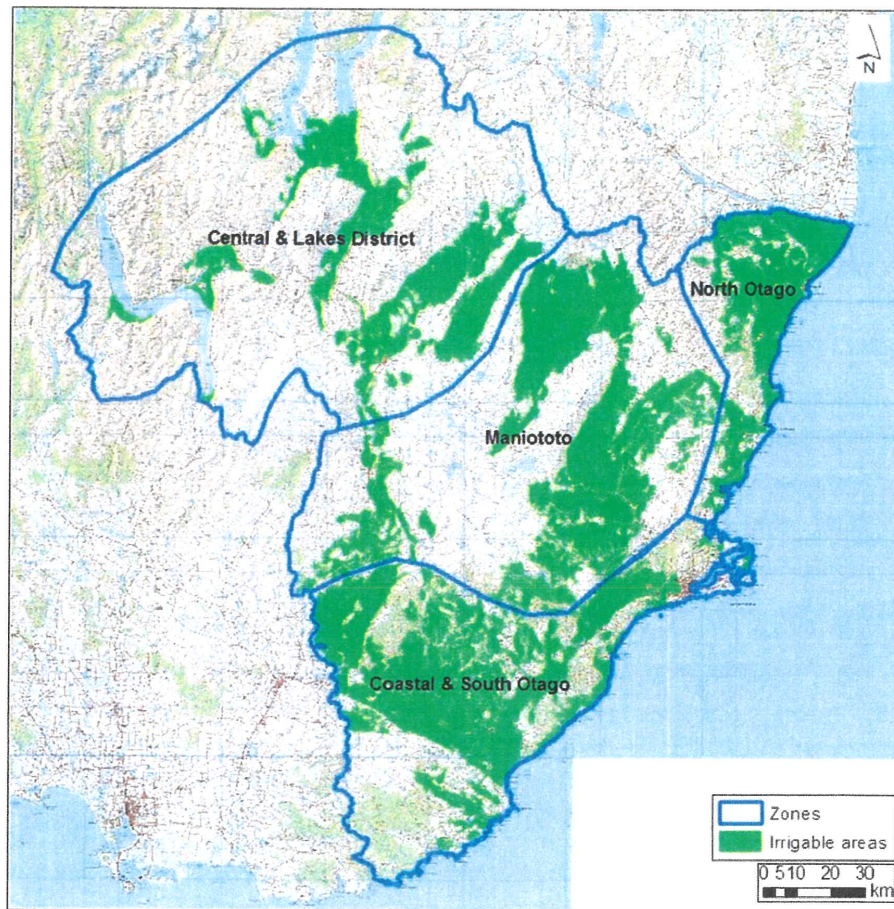


Figure 3: Likely irrigable areas

6 IRRIGATION DEMANDS

ORC and other users should use these values in combination with the map shown in Figure 5 (a digital copy of this map will be provided to ORC on request) to determine the relevant zone and MAR for specific locations to determine reasonable irrigation demands for that area. The relevant soil PAW for a farm can be obtained from S-map, the FSL database or a site specific soil investigation.

6.1 Pasture

A summary of reasonable irrigation water demands for pasture is given in Table 5.

As outlined in Section 5, reasonable irrigation demands have been estimated on the basis that the irrigation system capacities (i.e. peak daily demand) should not result in more than an approximately 0.5% average annual pasture production decrease. The annual (i.e. seasonal) demands are presented for average, 80th percentile (i.e. two-in-ten year drought), 90th percentile (one-in-ten year drought) and maximum situations. These values are calculated based on irrigation water requirements for the 1972-2014 irrigation seasons.

Table 5 : Irrigation water demand for pasture

Zone	MAR (mm/yr)	600 mm PAW (mm)	Peak daily demand (mm/d)	Maximum monthly demand (mm/month)	Annual demand (mm/yr)			
					Average	80%ile	90%ile	Maximum
Central & Lakes District	350	40	5.6	174	747	833	866	1,002
		60	5.2	161	734	806	866	988
		90	4.8	149	700	802	835	950
		120	4.4	136	659	752	792	911
		150	4.4	136	635	726	774	942
	450	40	5.5	171	685	787	820	919
		60	5.1	158	668	770	791	913
		90	4.8	149	628	748	773	883
		120	4.2	130	578	714	714	840
		150	3.9	121	547	659	710	796
	550	40	5.5	171	645	754	785	875
		60	5.1	158	629	729	769	877
		90	4.7	146	575	696	729	818
		120	4.2	130	525	660	672	777
		150	3.7	115	489	622	654	714
	650	40	5.4	167	579	673	724	821
		60	4.7	146	552	635	689	785
		90	4.7	146	508	619	649	771
120		4.2	130	462	580	630	714	

Zone	MAR (mm/yr)	600 mm PAW (mm)	Peak daily demand (mm/d)	Maximum monthly demand (mm/month)	Annual demand (mm/yr)			
					Average	80%ile	90%ile	Maximum
750	90	90	2.9	90	385	466	493	551
	120	90	2.8	90	348	447	485	510
	150	84	2.7	84	324	410	460	494
	40	121	3.9	121	398	492	511	558
	60	93	3.0	93	373	459	499	543
	90	90	2.9	90	331	430	464	493
	120	87	2.8	87	282	392	431	470
	150	68	2.2	68	257	354	375	405

6.2 Viticulture

Table 6 lists the daily, monthly and seasonal irrigation water demands for grapes. These demands include a 10% system loss that occurs between water take (e.g. pump) and soil surface, which is considered to be reasonable for a well-managed irrigation system. This system loss may include evaporative losses from bare soil or uneven soil characteristics for example.

We recommend an allocation of 2.42 mm/d daily irrigation demand (i.e. 2.2 mm/d irrigation demand plus 10% loss) for grapes.

The mm/d daily demand figures should be applied to the total planted area of the vineyard, including the inter-row area, regardless of planting density.

Assuming that water is applied to the vines using drip irrigation at a planting density of 2500 vines per hectare, the 2.2 mm/d corresponds to 8.8 litres/vine/day.

The demand figures do not allow for irrigation of and uptake of water by the inter-row. If the inter-row is to be irrigated, or the inter-row is likely to be removing significant amounts of water that would have otherwise been available to the vines, additional water could be required.

Table 6 (last column) shows that the available soil moisture (ASM) meets or exceeds the irrigation criteria of exceeding 40% PAW for 90% of the time in the irrigation season (September to April).

Table 6: Irrigation water demand for grapes

Zone	MAR (mm/yr)	900 mm PAW (mm)	Daily demand (mm/d)	Maximum monthly demand (mm/month)	Annual demand (mm/yr)				%ASM > 40%PAW
					Average	80%ile	90%ile	Maximum	
Central & Lakes District	40	75	2.42	75	201	232	258	329	98
	60	75	2.42	75	188	219	248	332	100
	90	75	2.42	75	171	201	234	322	100
	120	77	2.42	77	159	193	222	310	100
	150	77	2.42	77	147	179	212	300	100
	200	77	2.42	77	136	173	203	290	100

Zone	MAR (mm/yr)	900 mm PAW (mm)	Daily demand (mm/d)	Maximum monthly demand (mm/month)	Annual demand (mm/yr)				%ASM>40%PAW
					Average	80%ile	90%ile	Maximum	
	450	40	2.42	75	173	217	239	293	99
		60	2.42	75	157	205	229	281	99
		90	2.42	75	136	182	217	259	100
		120	2.42	77	122	163	203	247	100
		150	2.42	77	110	144	193	237	100
		200	2.42	77	98	131	183	227	100
	550	40	2.42	73	156	196	208	247	99
		60	2.42	75	137	180	198	235	100
		90	2.42	73	112	156	176	208	100
		120	2.42	73	97	140	164	198	100
		150	2.42	73	83	130	150	189	100
	650	200	2.42	73	72	120	140	174	100
		40	2.42	73	125	162	174	215	99
		60	2.42	73	106	146	162	203	100
		90	2.42	73	81	121	144	184	100
120		2.42	73	67	102	135	165	100	
750	150	2.42	73	55	89	125	145	100	
	200	2.42	73	44	76	110	136	100	
	40	2.42	73	129	157	169	225	99	
	60	2.42	73	109	141	159	213	100	
	90	2.42	75	84	113	140	198	100	
850	120	2.42	73	69	105	130	189	100	
	150	2.42	73	57	91	116	179	100	
	200	2.42	68	46	81	106	165	100	
	40	2.42	70	98	126	133	157	100	
	60	2.42	70	79	111	123	143	100	
Coastal & South Otago	650	90	2.42	70	56	91	108	116	100
		120	2.42	63	44	73	91	106	100
		150	2.42	58	34	61	77	97	100
		200	2.42	48	25	46	67	87	100
		40	2.42	61	56	75	84	109	100
	750	60	2.42	53	43	64	77	99	100
		90	2.42	44	28	48	60	85	100
		120	2.42	39	19	39	44	77	100
		150	2.42	34	12	24	34	63	100
		200	2.42	34	7	14	24	53	100
750	40	2.42	58	52	74	80	106	100	
	60	2.42	56	38	56	63	94	100	
	90	2.42	46	22	41	46	73	100	

Zone	MAR (mm/yr)	900 mm PAW (mm)	Daily demand (mm/d)	Maximum monthly demand (mm/month)	Annual demand (mm/yr)				%ASM > 40%PAW
					Average	80%ile	90%ile	Maximum	
		120	2.42	53	21	39	57	97	100
		150	2.42	44	14	24	47	87	100
		200	2.42	39	9	15	33	73	100

Note: Daily demand includes 10% irrigation system losses. Monthly and annual demand also includes this system loss. Modelled minimum return interval is 1 day for PAW's up to 90 mm, and 2 days for PAW > 90 mm.

6.3 Cherries and apricots

A summary of reasonable irrigation water demands for apricots and cherries is given in Table 7. These have been estimated on the basis that the system capacities (i.e. peak daily demand) should maintain available soil moisture (ASM) above 50% PAW in 90% of the time based on October to April irrigation seasons.

These demands include a 5% system loss that occurs between the water take (e.g. pump) and soil surface, which is considered to be reasonable for a well-managed irrigation system. The annual (i.e. seasonal) demands are presented for average, 80th percentile (i.e. two-in-ten drought year), 90th percentile (one-in-ten drought year) and maximum. These values are calculated based on irrigation water requirements for the 1972-2014 irrigation seasons.

Table 7: Irrigation water demand for apricots and cherries

Zone	MAR (mm/yr)	1000 mm PAW (mm)	Daily demand (mm/d)	Maximum monthly demand (mm/month)	Annual demand (mm/yr)				%SAM > 50%PAW
					Average	80% ile	90% ile	Maximum	
Central & Lakes District	350	200	4.9	152	582	664	736	834	90
		150	5.0	155	602	693	751	851	90
		120	5.2	161	619	704	765	868	90
		90	5.4	167	627	703	768	873	89
		60	5.7	177	655	728	786	898	88
	450	200	4.7	146	511	622	680	785	90
		150	4.9	152	536	633	707	803	90
		120	5.0	155	553	646	707	819	90
		90	5.3	164	567	668	724	824	89
		60	5.6	174	605	682	750	847	87
550	200	4.5	140	466	581	648	737	90	
	150	4.8	149	494	602	676	756	89	
	120	4.9	152	513	614	675	772	88	
	90	5.2	161	533	631	693	786	88	
	60	5.5	171	576	656	702	809	86	
650	200	4.4	136	414	538	582	707	90	

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Irrigation Requirements

IRRIGATION REASONABLE USE DATABASE

5 STEPS - TO GET THE IRRIGATION REQUIREMENTS INFORMATION YOU NEED FOR IRRIGATION PLANNING, CONSENTING AND DESIGN



Ministry for Primary Industries
Manatū Ahu Matua

Sustainable Farming Fund





1 Enter the address or coordinates (latitude longitude) of your farm and click 'Locate' or click on the map
 -45.193 , 169.335 [Locate](#)



2 Select Crop
Pasture

3 Select Plant Available Water
(b) User specified PAW's

4 Select Irrigation Method
80% Efficient Irrigator

5 [Fetch Data](#)

Farm Details		Plant Available Water Details			Irrigation Requirements		
Description	PAW(mm)	Indicative Likelihood	Area (hectares)	Per Hectare	Total Area		
Latitude	-45.193	90	4.5	System Capacity	0.61 (l/s/ha)	2.74 (l/s)	
Longitude	169.335	PAW	0	System Capacity	5.3 (mm/day)		
Council	Otago	PAW	0	Daily Volume	53 (m ³ /ha)	238 (m ³)	
Climate Site ID	P067049	PAW	0	7 Day Volume			
Distance to Climate Site (km)	2.15	PAW	0	28 Day Volume			
Rainfall (mm)	432		Total area = 4.5	90% ile Annual Volume	7,508 (m ³ /ha)	33,786 (m ³)	

These estimates of irrigation requirements are based on the assumption that the crop you selected can be grown and irrigated at the site you have selected. Constraints such as topography and crop-specific climate requirements are not taken into account.

Irrigation requirements may be less than reported here if your soils are poorly drained or the water table is close to the soil surface.

[Detailed Results](#)

[Save this Page](#)

[User Guide](#)

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Irrigation Requirements

IRRIGATION REASONABLE USE DATABASE

5 STEPS - TO GET THE IRRIGATION REQUIREMENTS INFORMATION YOU NEED FOR IRRIGATION PLANNING, CONSENTING AND DESIGN

Sustainable Farming Fund

1 Enter the address or coordinates (latitude longitude) of your farm and click 'Locate' or click on the map
 -45.193 , 169.335 [Locate](#)

2 Select Crop
Grapes

3 Select Plant Available Water
(b) User specified PAW's

4 Select Irrigation Method
Micro/Drip

5 [Fetch Data](#)

Farm Details		Plant Available Water Details			Irrigation Requirements		
Description	PAW(mm)	Indicative Likelihood	Area (hectares)	Per Hectare	Total Area		
Latitude	-45.193	0.3	4.5	System Capacity	0.26 (l/s/ha)	1.17 (l/s)	
Longitude	169.335		0	System Capacity	2.2 (mm/day)		
Council	Otago		0	Daily Volume	22 (m ³ /ha)	99 (m ³)	
Climate Site ID	P067049		0	7 Day Volume			
Distance to Climate Site (km)	2.15		0	28 Day Volume			
Rainfall (mm)	432	Total area =	4.5	90% ile Annual Volume	1,591 (m ³ /ha)	7,160 (m ³)	

These estimates of irrigation requirements are based on the assumption that the crop you selected can be grown and irrigated at the site you have selected. Constraints such as topography and crop-specific climate requirements are not taken into account.

Irrigation requirements may be less than reported here if your soils are poorly drained or the water table is close to the soil surface.

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Irrigation Requirements

IRRIGATION REASONABLE USE DATABASE

5 STEPS - TO GET THE IRRIGATION REQUIREMENTS INFORMATION YOU NEED FOR IRRIGATION PLANNING, CONSENTING AND DESIGN

Ministry for Primary Industries
Manatū Ahu Matua
Sustainable Farming Fund

1 Enter the address or coordinates (latitude longitude) of your farm and click 'Locate' or click on the map
-45.193 , 169.335 **Locate**

2 Select Crop
Stonefruit

3 Select Plant Available Water
(b) User specified PAW's

4 Select Irrigation Method
Micro/Drip

5 **Fetch Data**

Farm Details		Plant Available Water Details		Irrigation Requirements		
Description	PAW(mm)	Indicative Likelihood	Area (hectares)	Per Hectare	Total Area	
Latitude	-45.193	90	4.5	System Capacity	0.58 (l/s/ha)	2.61 (l/s)
Longitude	169.335	PAW	0	System Capacity	5 (mm/day)	
Council	Otago	PAW	0	Daily Volume	50 (m ³ /ha)	225 (m ³)
Climate Site ID	P067049	PAW	0	7 Day Volume	(m ³ /ha)	(m ³)
Distance to Climate Site (km)	2.15	PAW	0	28 Day Volume	(m ³ /ha)	(m ³)
Rainfall (mm)	432		Total area = 4.5	90% ile Annual Volume	7,082 (m ³ /ha)	31,869 (m ³)

These estimates of irrigation requirements are based on the assumption that the crop you selected can be grown and irrigated at the site you have selected. Constraints such as topography and crop-specific climate requirements are not taken into account.

Irrigation requirements may be less than reported here if your soils are poorly drained or the water table is close to the soil surface.

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APPENDIX 6

Manuherikia Irrigation Scheme Letter and Bore Log

Manuherikia Irrigation Co-operative Society Ltd

PO Box 201

ALEXANDRA

Secretary/Treasurer: Allison Sutton

Phone/Fax: (03) 449 2562

18 January 2000

Leon van Boxtel
68 Newcastle Street
CLYDE

Dear Sir

Re: Application for Irrigation water Supply ex AG Raceline

We acknowledge receipt of your letter dated 11 January 2000 wherein you make application for irrigation water for the block of land contained in CT 17D/457 (formerly CT 16B/206).

The block currently has no water entitlement. As you are aware the Society's water resource is fully allocated but blocks of water do become available from time to time.

Your application will be put on file for consideration when the rosters are redrafted for the 2000/2001 season. This will be done in July/August 2000.

Yours faithfully



Allison Sutton
Secretary/Treasurer
(file: 118011)

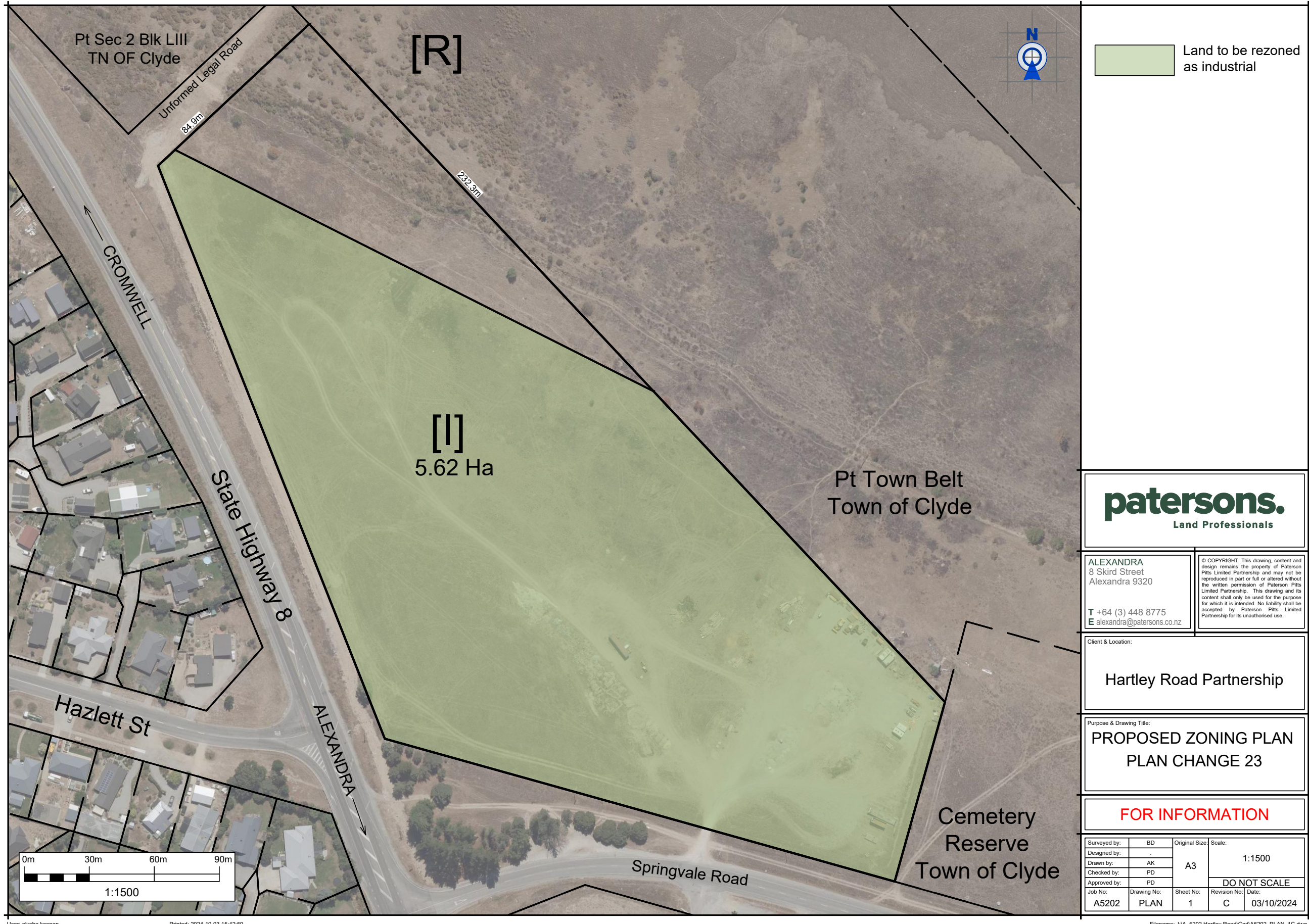


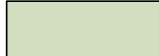
MCNEILL DRILLING CO. LTD

WATER BORE/WELL SUMMARY FORM

CLIENTS NAME: <i>LEON VAN BOXTEL</i>	BORE SIZE: <i>75mm</i>
FULL ADDRESS: <i>CLUPE</i>	START DATE: <i>23.12.99</i>
RAPID NO:	FINISH DATE:
GRID REFERENCE:	<i>23.12.99</i>
DRILLER: <i>CHRIS DEKONING</i>	MACHINE: <i>EDSON</i>
MEASURED FROM: <i>GROUND LEVEL</i>	DRILL METHOD:
TOTAL DEPTH BORE: <i>36.0 METRES</i>	<i>NQ AIR CORE</i>
TOP LEADER: <i>-</i>	
SWL: <i>26.5 METRES</i>	
SCREEN: SLOT: <i>-</i>	LENGTH: <i>-</i>
TYPE: <i>-</i>	SIZE: <i>-</i>
PVC SLOTTED: TOP: <i>-</i>	BASE: <i>-</i>
SCREEN/LEADER/SUMP: <i>-</i>	SUMP SIZE: <i>-</i>
TOTAL CASING USED: <i>-</i>	
AIRLIFTED/PUMPED AT: <i>-</i>	
TEST PUMP PERIOD: <i>-</i> HOURS <i>-</i> MIN	
DRAWDOWN FROM SWL: <i>-</i>	
AIR/PUMP INTAKE: <i>-</i>	
BACTERIAL WATER TEST: <i>-</i>	
CHEMICAL WATER TEST: <i>-</i>	
EXTRA NOTES: <i>NO GROUNDWATER POTENTIAL FROM CLAY BOUND GRAVELS</i>	
BORE LOG:	
<i>00.00 - 10.60 SANDY SILTY GRAVEL.</i>	
<i>10.60 - 12.80 SAND</i>	
<i>12.80 - 18.10 SANDY GRAVEL</i>	
<i>18.10 - 18.90 COARSE SANDY GRAVEL.</i>	
<i>18.90 - 23.80 SANDY SILTY GRAVEL</i>	
<i>23.80 - 24.60 LOOSE SANDY GRAVEL</i>	
<i>24.60 - 26.10 SAND</i>	
<i>26.10 - 36.00 VERY SILTY CLAY BOUND GRAVEL</i>	

MCD31.5/97



 Land to be rezoned as industrial



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:	AK		
Checked by:	PD	DO NOT SCALE	
Approved by:	PD	Job No:	Drawing No:
		A5202	PLAN
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			03/10/2024

User: alysha.keenan

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PC00023

17 September 2024

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



1 Dunorling Street
PO Box 122, Alexandra 9340
New Zealand

03 440 0056

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



Dear Sir/Madam

FURTHER INFORMATION REQUIRED FOR PLAN CHANGE 23

Location: SPRINGVALE ROAD, CLYDE

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

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

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

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



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

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

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

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

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

Responding to this request:

Following the receipt of this letter you must either:

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



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

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

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

Restarting the processing of your request

The processing of your request will restart:

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

Once the processing of the request restarts:

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

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

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

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

Yours faithfully

Adam Vincent
Planning Officer – Intermediate



1 October 2024

The Central Otago District Council
PO Box 122
Alexandra

Attn: Adam Vincent
By email 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 .

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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 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.

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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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Dunedin PO Box 5933 Dunedin 9054 03 477 3245	Queenstown PO Box 2645 Wakatipu Queenstown 9349 03 441 4715	Wānaka PO Box 283 Wānaka 9343	Cromwell PO Box 84 Cromwell 9342 03 445 1826	Alexandra PO Box 103 Alexandra 9340 03 448 8775	Oamaru Level 2 19 Eden Street Oamaru 9400 03 443 8727	Christchurch PO Box 9194 Tower Junction Christchurch 8149 03 928 1533
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DOCUMENT CONTROL

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

AUTHOR(S)

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

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	Appendix 'K' - Landscape Assessment	
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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

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
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 .

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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 is 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 1500m².

On the opposite side of SH8 is the Clyde township, generally consisting of lots averaging 800-1000m² with large standalone dwellings, a reflection of the minimum lot size required for unreticulated 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.

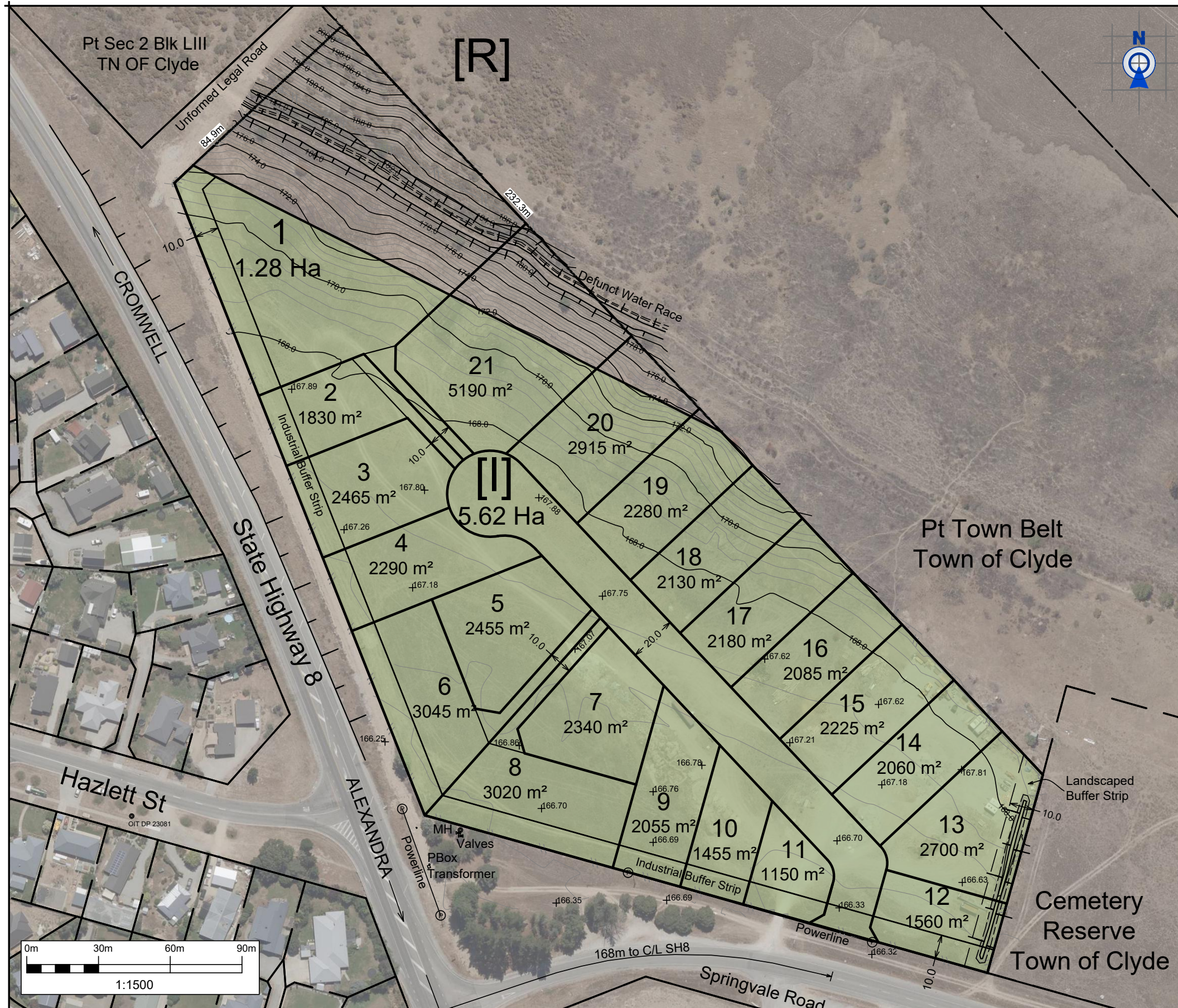
7.0 DOCUMENTS TO SUPPORT THE REQUEST

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

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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	DO NOT SCALE	
Approved by:	PD	Job No:	Revision No: Date:
		A5202	PLAN 1 B 27/09/2024

Appendix 'B' - Records of Title

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**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

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

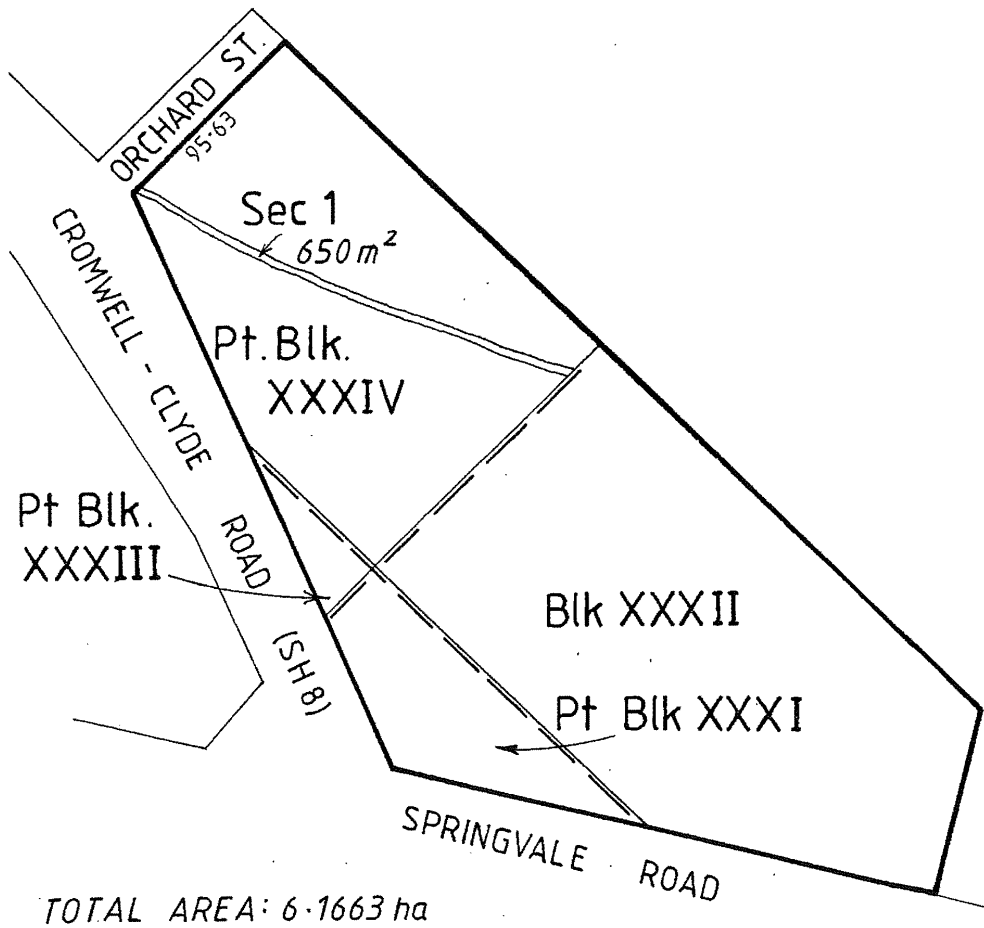
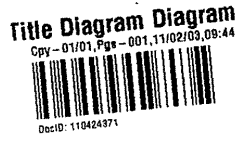
Registered Owners

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

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

Identifier 51710





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
Total Area		6.6070 Ha	

Schedule / Memorandum

LT 600773 Schedule/Memorandum

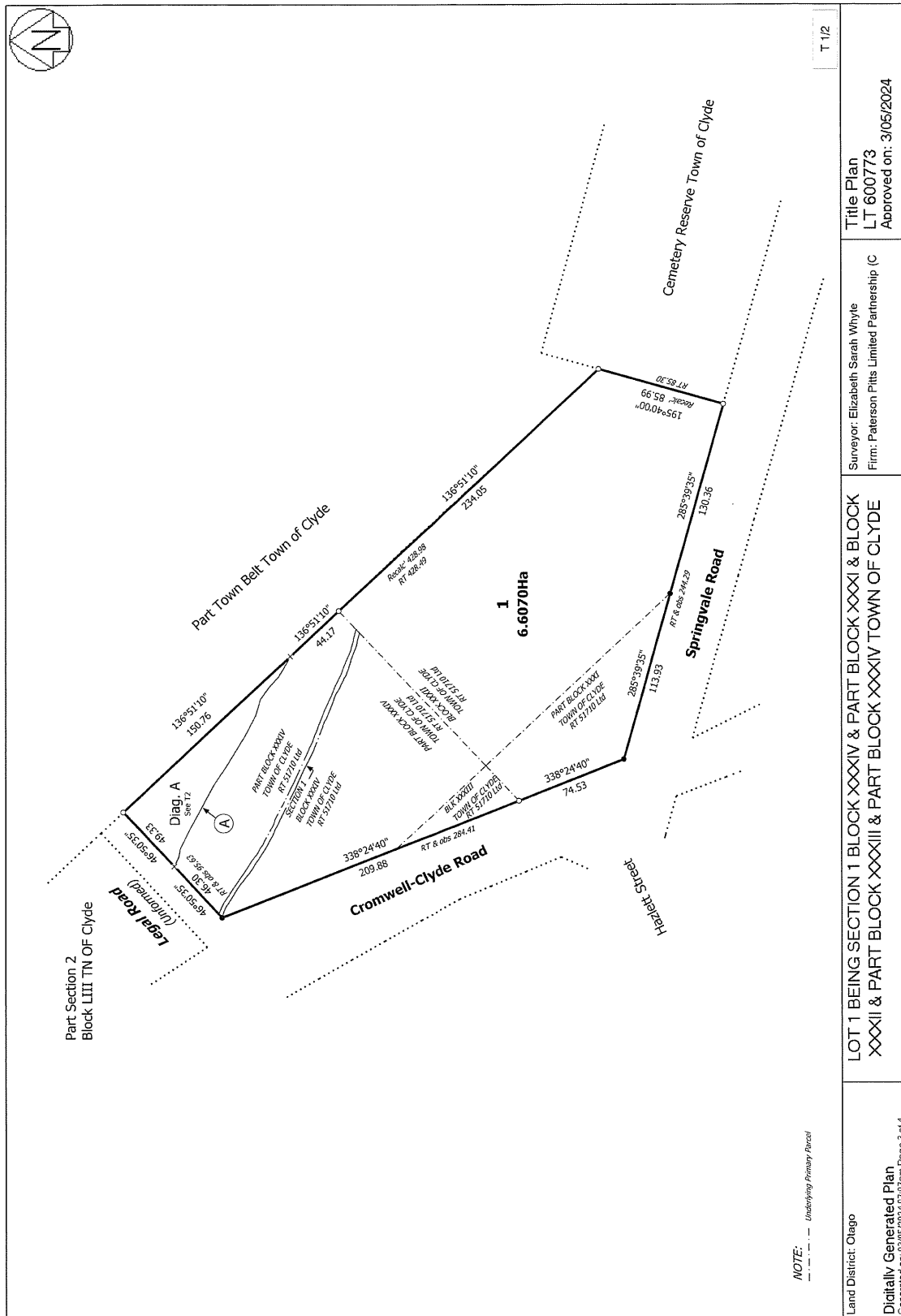
Land registration district
Otago

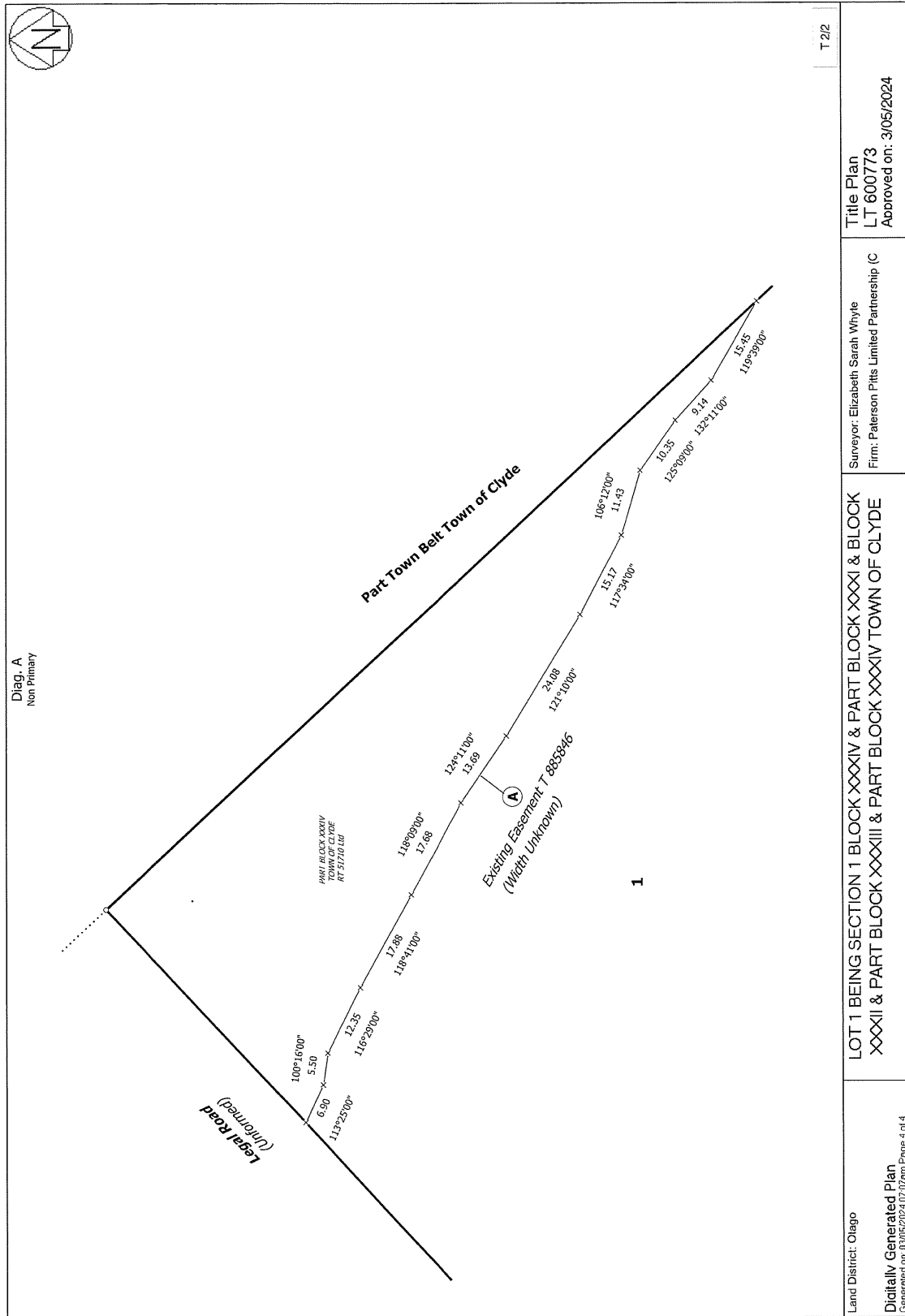
Territorial authority
Central Otago District

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





Appendix 'C' - District Plan Maps

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Finner Transitions (Variant) District Plan.



Re S.C. 11B
Op 3/11/24

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

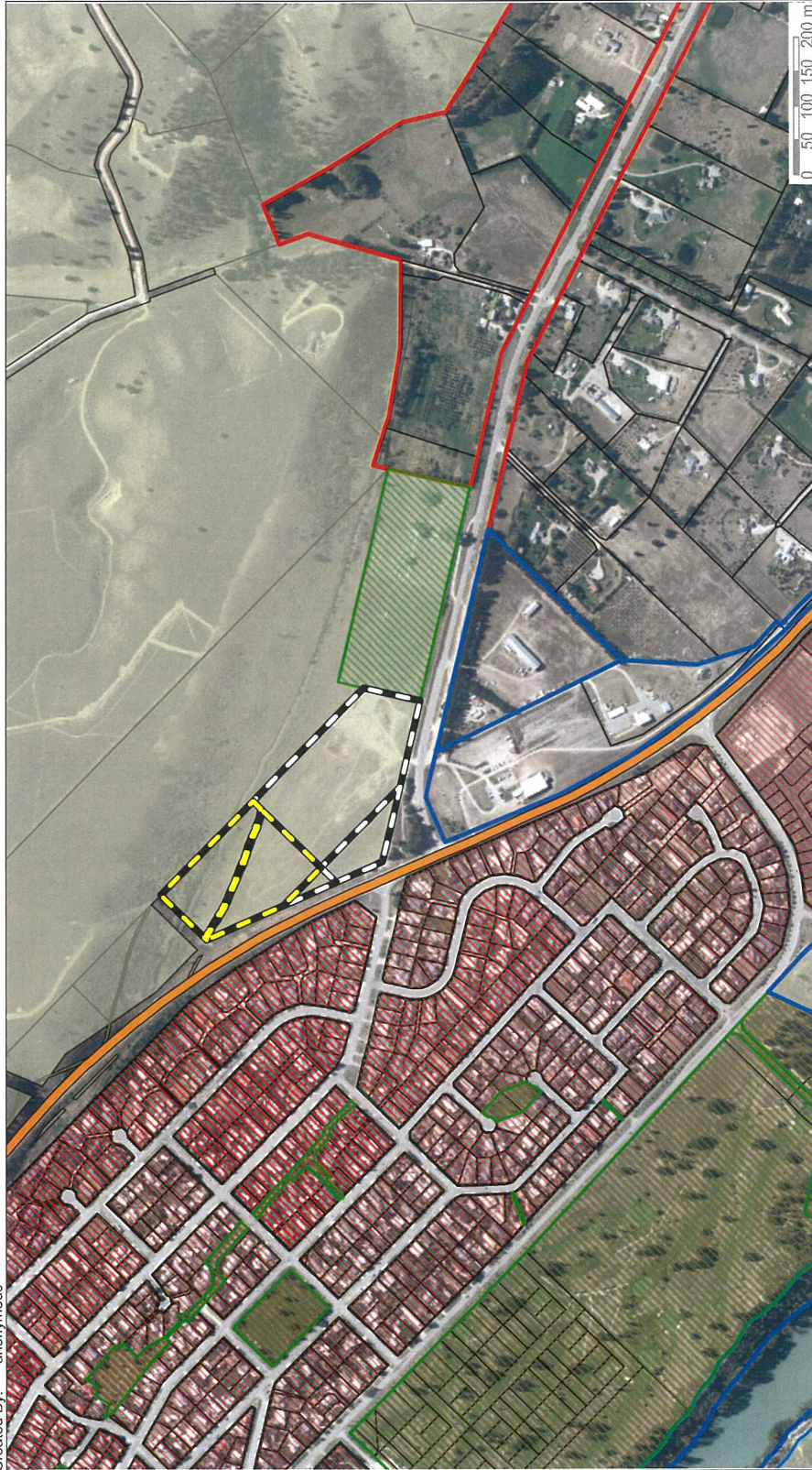
BCNZ	Broadcasting Corporation
HFS	High Frequency Station
CBC	Cromwell Borough Council
CEM	Cemetery
DSIR	Department of Scientific & Industrial Research
Au Stn	Aural Station
FS	Fire Station
GOVT	Government purposes
H PUB	Hospital Public
HR	Historic Reserve
MWD	Ministry of Works & Development
NZR	Railway Purposes
NP	National Park
NZED	Electricity Department
NZFS	Generation of Electricity
SF	Forest Service
NZPO	State Forest
PO	Post Office Purposes
TE	Post Office
POS	Telephone Exchange
RES	Public Open Space Reserve
REC RES	Recreation Reserve
SC RES	Scenic Reserve
GQ	Gravel Quarry
VCC	Vincent County Council
ABC	Alexandra Borough Council
XXXXXX	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
W	Wetland Habitat
F	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
1313646.34379065,4989970.23921172

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

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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 03 441 4715	Wānaka PO Box 283 Wānaka 9343	Cromwell PO Box 84 Cromwell 9342 03 445 1826	Alexandra PO Box 103 Alexandra 9340 03 448 8775	Oamaru Level 2 19 Eden Street Oamaru 9400 03 443 8727	Christchurch PO Box 9194 Tower Junction Christchurch 8149 03 928 1533
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1

DOCUMENT CONTROL

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

AUTHOR(S)

Prepared	Peter Dymock Patersons – Alexandra Office
Reviewed	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 principle 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 SH8 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

patersons.co.nz

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
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
[Facebook](#) | [Twitter](#) | [LinkedIn](#)



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

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

Aukaha (1997) Ltd
Level 2, 266 Hanover Street, Dunedin 9016 | PO Box 446, Dunedin 9054 | Phone - 03 477 0071
consents@aukaha.co.nz www.aukaha.co.nz

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



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



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From: Aukaha Website <aukaha@weave.co.nz>

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

To: Aukaha Consents <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 Boxtel

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

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

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

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

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

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

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

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Use same address for Postal Address

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Company Details - Email

leon@benchmarkconstruction.co.nz

Phone

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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

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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

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.
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 - 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.
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- 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

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 <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

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

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

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 / **w** <http://www.nzta.govt.nz>

This message, together with any attachments, may contain information that is classified and/or subject to legal privilege. Any classification markings must be adhered to. If you are not the intended recipient, you must not peruse, disclose, disseminate, copy or use the message in any way. If you have received this message in error, please notify us immediately by return email and then destroy the original message. This communication may be accessed or retained by Waka Kotahi NZ Transport Agency for information assurance purposes.

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

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Alexandra Office:

6 Skird Street, Alexandra

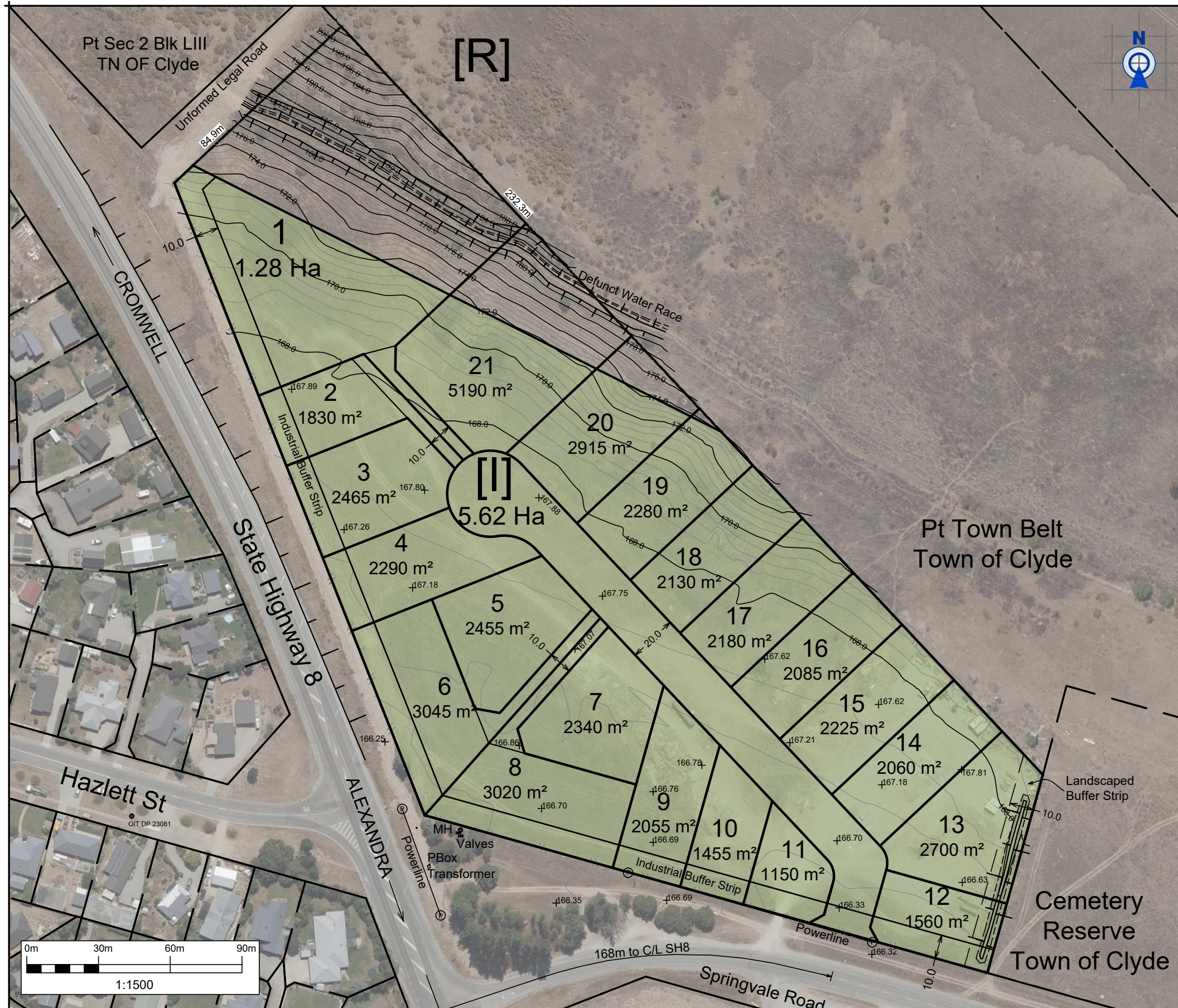
or P.O. Box 103, Alexandra 9340, New Zealand

T 03 4488775

W www.ppgroup.co.nz

Appendix '2' – Possible Subdivision

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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)



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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		
Approved by:	PD		DO NOT SCALE
Job No:	Drawing No:	Sheet No:	Revision No: Date:
A5202	PLAN	1	B 27/09/2024

Appendix 'E' - Sec 32 Evaluation

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REQUEST FOR A CHANGE
TO THE OPERATIVE
CENTRAL OTAGO DISTRICT PLAN

Evaluation under Section 32 of the
Resource Management Act 1991

HARTLEY ROAD PARTNERSHIP

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Dunedin PO Box 5933 Dunedin 9054 03 477 3245	Queenstown PO Box 2645 Wakatipu Queenstown 9349 03 441 4715	Wānaka PO Box 283 Wānaka 9343	Cromwell PO Box 84 Cromwell 9342 03 445 1826	Alexandra PO Box 103 Alexandra 9340 03 448 8775	Oamaru Level 2 19 Eden Street Oamaru 9400 03 443 8727	Christchurch PO Box 9194 Tower Junction Christchurch 8149 03 928 1533
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DOCUMENT CONTROL

Project	
Client	Hartley Road Partnership
Project No.	A5202
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AUTHOR(S)

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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	This option would require resource consents to achieve the objectives of the Request. This creates the following costs: <ul style="list-style-type: none"> (a) Non-complying subdivision and land use consents would be required to breach almost all of the Rural Resource Area Rules for industrial activity. (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. (c) Uncertain outcomes from numerous, public processes. This potential option is not reasonably practical will not be considered further in this evaluation.
Await Council District Plan Review	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. <ul style="list-style-type: none"> (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. (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. Accordingly, this option will not be considered further in this evaluation.
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.	This option is potentially efficient as it utilises and minimally modifies an existing resource area (the Industrial Resource Area) within the District Plan. This option is reasonably practical and is considered further below.

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.
---	--

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"> * The existing zoning is well understood and can be easily implemented. * Compatible with the existing zoning provisions in the District Plan. * Provides flexibility to respond to changing market and social and economic preferences. * Provides for a comprehensive range of industrial and commercial uses.
Costs	<ul style="list-style-type: none"> * Provides less certainty to Council and community as to the detailed form of development of the site.
Efficiency	<ul style="list-style-type: none"> * Only minor amendments required to District Plan, therefore less costs to Council and requester. * Avoids over-complicating the District Plan.
Effectiveness	<ul style="list-style-type: none"> * Simple and effective method of achieving the objectives of the Request.
Risk of acting (or not acting)	<ul style="list-style-type: none"> * 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.

Option 2	Re-zone the site with a bespoke zoning
Benefits	<ul style="list-style-type: none"> * Provides some certainty to Council and Community as the out come of the development of the site, typically by way of a "masterplan".
Costs	<ul style="list-style-type: none"> * Expensive to implement for both the Council and the Requestors requiring detailed design at the outset. * 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. * Users of the plan may be unfamiliar with the bespoke provisions.

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, Remedying 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 SignsPol 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
12.7.1(iii) (h) & (i), 12.7.1 (ix) 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 Appendix G has identified as already being required . The Request will generate increased traffic onto this intersection.
9.3.6 (iv) (d) 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 Appendix K , 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
2.1 to 2.2 (Kai Tahu values and interests)	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. Aukaka 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.
3.1 to 3.2 (Functions and values of Otago's ecosystems and natural resources)	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.
4.1 (Risk that natural hazards pose to Otago's communities are minimal)	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 Appendix J 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.
4.3 (Infrastructure managed and developed in a sustainable way)	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.
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)	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.
4.6 Hazardous substances, contaminated land and waste materials do not harm human health or the quality of the environment in Otago.	The PSI at Appendix H has been provided with the Request and confirms the site is suitable for industrial activity.
5.3 Sufficient land is managed and protected for economic production	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
MW – Manawhenua	See comments above under 2.1-2.2 of the oRPS.
LF-PW-P15 Stormwater and wastewater discharges	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.
LF -CS- P19 Highly Productive Land	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.
EIT-INF-P17 Urban Growth and Infrastructure	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.
EIT – TRAN -P19 Transport System Design	The Request provides for an upgrade of the intersection of SH8 and Springvale Road.
HAZ-NH-O1 Natural Hazards	As per Geotech report at Appendix J . The site is not subject to any natural hazards.
HAZ – CL Contaminated land	A PSI at Appendix H has been provided with the Request and confirms the site is suitable for industrial activity.
HCV – NH Historic heritage	The area subject to the Request does not contain any sites of Historic Heritage .
NFL-O7 Outstanding Natural Features	The area subject to the Request does not contain any outstanding natural features or landscapes.
UFD -O2 Development of urban areas UFD-O3 Strategic Planning	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

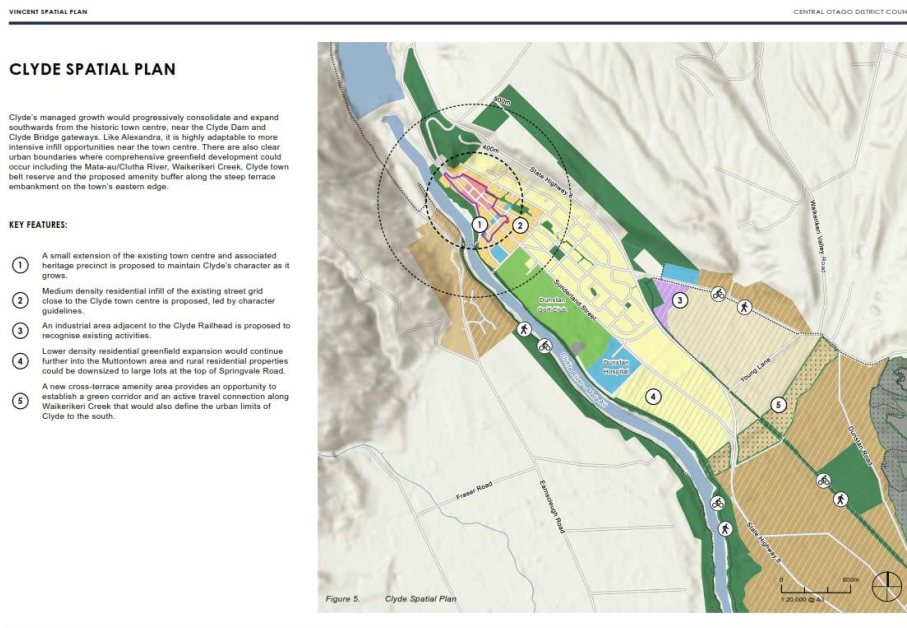
The Request fully complies with the long-term strategic objectives of the Plan in that:

- 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.



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

patersons.co.nz

Savvy Consulting Ltd
46 Kennedy Crescent
Wanaka 9305

27th September 2024

Adam Vincent
Planning Officer
Central Otago District Council
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 17th 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 27th September 2024. The previous version of the Report should be disregarded.

Kind regards

Natalie Hampson

Director

natalie@savvyconsulting.co.nz



Appendix 'G' - Integrated Transport Assessment

patersons.co.nz

Peter Dymock

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

patersons.co.nz

Appendix 'I' - Infrastructure Assessment

patersons.co.nz

Appendix 'J' - Geotechnical Assessment

patersons.co.nz

Appendix 'K' - Landscape Assessment

patersons.co.nz

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

patersons.co.nz

Adam Vincent

From: Duncan White <Duncan.White@patersons.co.nz>
Sent: Wednesday, 11 February 2026 5:21 pm
To: Adam Vincent
Cc: Ann Rodgers
Subject: RE: [PAT A5202] Plan Change 23 - Assessment under Cl 3.6(5) of NPS-HPL

Categories: Application correspondence

Afternoon Adam,

Thank you for the opportunity to comment on Clause 3.6(5) of the NPS-HPL.

As no resource consent has been lodged for subdivision use or development on the land post NPS-HPL commencement, the land still meets the definition of highly productive land under Clause 3.5(7).

We agree that clause 3.6(5) is a relevant provision and requires that urban rezoning of highly productive land be limited to the minimum necessary to provide sufficient development capacity to meet expected demand.

The proposed rezoning area is approximately 5.62 hectares gross (Proposed Zoning Plan, Appendix 2 to the AEE). However, this gross figure does not equate to net industrial development capacity. The plan incorporates:

- A 10-metre landscaped buffer;
- Internal access and circulation;
- Setbacks and servicing areas; and
- Landform response and mitigation requirements.

As such, the net developable industrial land area will be less than 5.62 hectares once subdivision and infrastructure requirements are applied. Clause 3.6(5) refers to development capacity, which must reflect functional and deliverable land supply rather than raw zoned area.

The Section 32 evaluation and Economic Assessment identify limited remaining industrial capacity within the Vincent Ward, constrained vacant supply in Alexandra, and no industrially zoned land in Clyde. While Council is a Tier 3 authority and Clyde does not meet the NPS-UD urban environment definition, section 31(1)(aa) of the RMA requires sufficient development capacity for business land across the district.

The Land Productivity Report concludes that although parts of the site are mapped as LUC 3, the productive potential cannot realistically be realised due to lack of irrigation supply constraints.

Taking these matters together:

- The proposal provides industrial capacity where none currently exists in Clyde.
- The scale of rezoning is proportionate to identified demand and functional industrial design requirements.
- The opportunity cost in productive land terms is materially constrained.

Accordingly, the proposal can satisfy Clause 3.6(5) in that it is limited to the minimum necessary to provide sufficient development capacity to meet expected demand.

Hope this answers your question am happy to answer any further questions. Look forward to receiving the s42A report in due course.

Regards

Duncan White
Principal

03 746 8201 | 027 389 2316
duncan.white@patersons.co.nz | patersons.co.nz

Wānaka Office
03 443 0110
19 Reece Crescent
Wānaka 9305



Please consider the environment before printing this email.

From: Adam Vincent <Adam.Vincent@codc.govt.nz>
Sent: Tuesday, 3 February 2026 3:00 pm
To: Duncan White <Duncan.White@patersons.co.nz>
Subject: RE: Plan Change 23 - Assessment under CI 3.6(5) of NPS-HPL

Kia ora Duncan,

Have passed that on to Ann.

Ngā mihi,
Adam

From: Duncan White <Duncan.White@patersons.co.nz>
Sent: Tuesday, 3 February 2026 2:55 pm
To: Adam Vincent <Adam.Vincent@codc.govt.nz>
Subject: RE: Plan Change 23 - Assessment under CI 3.6(5) of NPS-HPL

Afternoon Adam,

Thanks. Just tried to call Ann when your message came through. Can you pass on a message that I've just talked to the client and they are on for the hearing on the 24th. So that date can be confirmed from the applicant's end if that works for Council.

Thanks also for your wishes. I hope so too but will see what happens and will just have to adapt.

Regards

Duncan White
Principal

03 746 8201 | 027 389 2316
duncan.white@patersons.co.nz | patersons.co.nz

Wānaka Office
03 443 0110
19 Reece Crescent
Wānaka 9305



Please consider the environment before printing this email.

From: Adam Vincent <Adam.Vincent@codc.govt.nz>
Sent: Tuesday, 3 February 2026 2:45 pm
To: Duncan White <Duncan.White@patersons.co.nz>
Subject: RE: Plan Change 23 - Assessment under CI 3.6(5) of NPS-HPL

Kia ora Duncan,

Ann has also caught me up with the situation at your end. I hope everything goes well for you and your partner.

Ngā mihi,

Adam Vincent
Planning Officer



+64 21 621 649
Adam.Vincent@codc.govt.nz
1 Dunorling Street, Alexandra 9320
www.codc.govt.nz

If you have received this email and any attachments to it in error, please take no action based on it, copy it or show it to anyone. Please advise the sender and delete your copy. Thank you.

From: Duncan White <Duncan.White@patersons.co.nz>
Sent: Tuesday, 3 February 2026 2:19 pm
To: Adam Vincent <Adam.Vincent@codc.govt.nz>
Subject: RE: Plan Change 23 - Assessment under CI 3.6(5) of NPS-HPL

Afternoon Adam,

Thanks for the message. Sorry to hear about your resignation. I'm looking at this issue for you now and working on some comments. I'll come back to you shortly with these.

I've been talking to Ann on the hearing date and will confirm this with her shortly too once I've talked to the client.

Regards

Duncan White
Principal

03 746 8201 | 027 389 2316
duncan.white@patersons.co.nz | patersons.co.nz

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03 443 0110
19 Reece Crescent
Wānaka 9305



Please consider the environment before printing this email.

From: Adam Vincent <Adam.Vincent@codc.govt.nz>
Sent: Wednesday, 28 January 2026 1:01 pm
To: Duncan White <Duncan.White@patersons.co.nz>
Subject: RE: Plan Change 23 - Assessment under CI 3.6(5) of NPS-HPL

Kia ora Duncan,

My understanding from talking to Ann is that we're looking to hold a hearing in March, so we can be sure to get a decision issued before the two year cutoff. I have also handed in my resignation, so it would be beneficial if we could resolve the hearing in a timely fashion. In order to let us reach that, I'm intending to finish off my s42A report next week, so I'd appreciate if you could respond by the end of the week.

Ngā mihi,

Adam Vincent
Planning Officer



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Adam.Vincent@codc.govt.nz
1 Dunorling Street, Alexandra 9320
www.codc.govt.nz

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From: Adam Vincent
Sent: Tuesday, 27 January 2026 9:51 am
To: Duncan White <duncan.white@patersons.co.nz>
Subject: Plan Change 23 - Assessment under CI 3.6(5) of NPS-HPL

Kia ora Duncan,

I'm hoping to finalise my s42A report for Plan Change 23 in the next week or so, in light of changes to the NPS-HPL. I just wanted to give you the opportunity to comment as you see fit on Clause 3.6(5) before I do so. My reading of the changes to the NPS-HPL mean that this section has become the only one that is relevant, but it got a light touch in the s32 report Peter prepared and Natalie's economic assessment.

Ngā mihi,

Adam Vincent
Planning Officer



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www.codc.govt.nz

If you have received this email and any attachments to it in error, please take no action based on it, copy it or show it to anyone. Please advise the sender and delete your copy. Thank you.

Adam Vincent

From: Kierie Zeelie
Sent: Wednesday, 7 May 2025 7:33 am
To: Adam Vincent
Cc: Julie Muir; Janis Quiding
Subject: RE: Springvale Rd/Cromwell Clyde Rd intersection enquiry

Hi Adam

If the Plan change is approved this site could be serviced by connecting into the Clyde reticulated water and wastewater networks.

No connection will be available from public water infrastructure along the property boundary.

Connections will only be available from the Clyde water and wastewater networks on the western side of State Highway 8.

Details of potential connections can only be confirmed at a later stage.

I trust this helps.

Thanks.

Kierie

From: Adam Vincent <Adam.Vincent@codc.govt.nz>
Sent: Monday, 5 May 2025 4:07 pm
To: Kierie Zeelie <Kierie.Zeelie@codc.govt.nz>
Subject: RE: Springvale Rd/Cromwell Clyde Rd intersection enquiry

Here's some email addresses and applicant names you could try

Peter Dymock Peter.Dymock@patersons.co.nz
Duncan White Duncan.White@patersons.co.nz
Leon van Boxtel leon@benchmarkconstruction.co.nz
Hartley Road Partnership

Ngā mihi,
Adam

From: Kierie Zeelie <Kierie.Zeelie@codc.govt.nz>
Sent: Monday, 5 May 2025 3:46 pm
To: Adam Vincent <Adam.Vincent@codc.govt.nz>
Subject: Springvale Rd/Cromwell Clyde Rd intersection enquiry

Hi Adam

Your earlier enquiry about the ability to service Lot 1 DP 600773 (Val 2846140127) refers.

I have touched base with Julie and she confirmed that there was a meeting and that she had sent an email to the appropriate people.

Do you have more information e.g. development name, developer etc so I can ask her for a search within her sent emails?

I look forward to your reply.

Thanks.

Kierie Zeelie

Water Services Planning and Policy Manager



+64 27 208 4833

Kierie.Zeelie@codc.govt.nz

1 Dunorling Street, Alexandra 9320

www.codc.govt.nz

If you have received this email and any attachments to it in error, please take no action based on it, copy it or show it to anyone. Please advise the sender and delete your copy. Thank you.



CONTAMINATED LAND INVESTIGATION – REVIEW FORM

1 Report Details

DSI Report Title:	Preliminary Environmental Site Investigation at the Corner of Springvale Road and State Highway 8, Clyde
Report Type	Preliminary site Investigation (PSI)
Additional Information Source(s)	PC00023 Appendix A – Land Subject to the request PC00023 Appendix D – Updated Assessment of Environmental Effects 20241001; PC00023 Appendix J – Geotechnical Assessment; 0004 submission – Central Otago District Council
Date Produced:	27 March 2024
Report Author (Company)	JKCM Ltd, trading as Insight Engineering (IE)
Report Reviewer/Sign Off (Company)	Claude Midgley – Author No reviewer/sign off
Report Reference:	24002
PSI Report Overview	PSI submitted in a letter format with no exec summary provided (as required within CLMG 1).

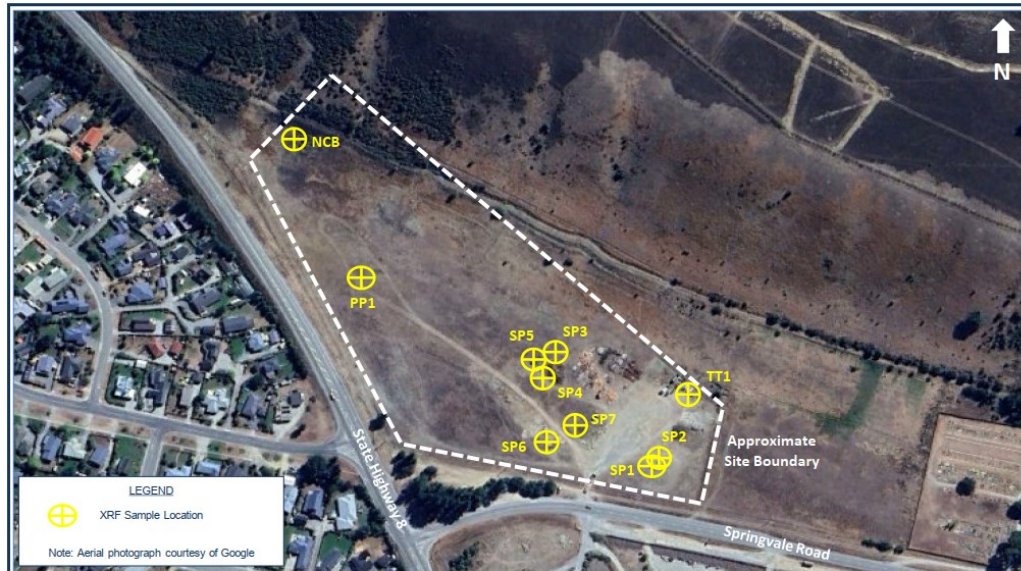


2 Property Information

Address	Northern corner of Springvale Road and State Highway 8, Clyde
Legal Description(s)	Section 1 Block XXXIV Town of Clyde, Part Block XXXIV Town of Clyde, Part Block XXXIII Town of Clyde, Block XXXII Town of Clyde and Part Block XXXI Town of Clyde
Current Owner	Leon Francis Van Boxtel, Jane Marie Scott, Christine Elizabeth Ramage and Lianneke Mechelina Adriana Lodge
Territorial Authority	Central Otago District Council
Regional Authority	Otago Regional Council
Relevant Consents	Not specified
Relevant Findings from Site Walkover	<p>Walkover completed 8 February 2024 by IE</p> <p>A small stockpile of treated timber boards and pegs was observed on the eastern side of a caravan located in the north eastern portion of the site. The treated timber covered an area estimated to be less than 10 m².</p> <p>Stockpiles of imported soil were observed in the south eastern portion of the site.</p> <p>Two small oil stains were observed in the area near to the caravan and another oil stain was observed in the area where four engine oil containers were stored near to the firewood production area west of the caravan.</p> <p>No other indicators of contamination were evident within the site boundaries.</p> <p>No surface water was present at the time of the site walkover inspection. Residential, commercial and reserve land surrounds the property.</p> <p>No visible signs of plant stress noted.</p>
Anecdotal Information	No rabbit control has been undertaken, and no waste has been buried, at the site.
Local Authority Records Search	<p>CODC Records search found no resource consent associated with the site. Seven building consents were issued between 1958 and 1972 for the construction of a poultry house, two egg rooms with an associated packing and store room, two hen houses, additions to the existing poultry house and a shed.</p> <p>No preliminary or detailed site investigations could be found on the property file.</p>



Site Plan from PSI Report (with sample locations if relevant)



Description	Sample Location Plan	Figure Number	2
Project	Preliminary Environmental Site Investigation at the Corner of Springvale Road and State Highway 8, Clyde	Date	Mar-24
Client	Hartley Road Partnership	Drawn by	CM
Project Number	24002	Approved by	JK





3 Summary of Environmental Site Assessment

Site History	<p>A comprehensive review of historical aerial photos and maps was completed with photographs between 1929 and 2023 reviewed. Retrolens, Google Earth and MapsPast were referenced. Aerial images were not appended to the report however.</p> <p>Notable historical activities:</p> <p>1929: railway line (south and west of site)</p> <p>1958: Clyde cemetery noted adjacent to east</p> <p>1966: Poultry sheds; flood irrigation mounds on southern part of site</p> <p>1969: Buildings located to the west of the site</p> <p>1978: Poultry sheds moved off site; gravel stockpiles on site.</p> <p>1984: Rectangular area on site cleared of vegetation.</p> <p>2005: Undeveloped; soil stockpiles and unidentifiable objects in south west corner.</p> <p>2010: Failure in part of the water race on site with potential reconstruction progressing.</p> <p>2011-2019: Site progressively more utilised for stockpiling of materials including sawdust/firewood, truck/trailer storage and water pipes (?); caravan storage.</p> <p>2023: Vehicles near caravan and timber stacks/firewood stockpiles.</p>
---------------------	--

Identified on site HAIL Activities (taken from NCC HAIL database)	Current or Historical	Location on Site
A17 – Storage tanks or drums for fuel, chemicals or liquid waste.	unknown	Engine oil storage on site
A18 – Wood treatment or preservation including the commercial use of anti-sapstain chemicals during milling, or bulk storage of treated timber outside.	historical	stockpiles of treated timber posts near to the north eastern corner of the site.
G5 – Waste disposal to land.	historical	From the importation of soil from unknown sources and placement of the soil in stockpiles on the site.



Identified off site HAIL Activities (within 200m)	Current or Historical	Location/Distance from Site
None within 200m, closest is 275m south east.		

<p>WSP Comments</p>	<p>Whilst the review of documentation is considered appropriate, there appears to be no mention of the Clyde Cemetery which is located approx. 170m east of the site boundary with the potential to extend up to the site boundary in the future (See CODC submission 004). Cemeteries are considered to be HAIL sites (G1) with migration potential. Assessment of migration from this source has not been completed.</p>
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4 Site Investigation Findings

4.1 SAMPLING AND ANALYSIS

Investigation Purpose	Preliminary Contamination Screening	Investigation location	areas of interest on site.
Was Sampling methodology appropriate?	XRF screening – No QA sampling for lab analysis conducted.	Was laboratory analysis appropriate?	No lab analysis. Appropriate for screening purposes only.
Analysis Completed	<input checked="" type="checkbox"/> Metals suite <input type="checkbox"/> TPH <input type="checkbox"/> PAH <input type="checkbox"/> BTEX <input type="checkbox"/> OCP <input type="checkbox"/> Asbestos <input type="checkbox"/> Other (eg. OP/ON pesticides)		

WSP Comments	<p>XRF field analysis for heavy metals is considered suitable for screening purposes only due to the inherent variability of results accuracy which may be due to sampling errors due to heterogeneity of soils, moisture content variation and suitability of detection limits. Whilst samples were taken and analysed by the XRF off-site, details of the QA/QC procedures used do not align with published semi quantitative XRF analysis guidance documents¹ which recommend sieving, drying and homogenisation of soil samples. It is recommended that <i>'quality assurance/quality control procedures are in place when undertaking a semi-quantitative investigation for regulatory purposes; to minimise the errors in the application of results and demonstrate the data derived from the XRF investigation is fit for purpose. This includes undertaking an assessment of total uncertainty measurements including sampling and analysis errors) to allow scientifically defensible decisions to made using the XRF data set.'</i></p> <p>Samples were taken from 3 areas of interest – Soil stockpiles, treated timber storage and poultry pens along with one sample considered to represent background. The depth of the samples is not recorded therefore it is assumed that these were taken from the top 150mm of soil at each location.</p> <p>The areas of interest are considered to be appropriate locations for potential contamination. The use of only one location to provide background concentrations however is not considered to provide adequate information with respect to local concentrations for assessment, particularly as this was</p>
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¹ US EPA Method 6200 as outlined in Waikato Regional Council Technical Report 2016/22: Guidance for analysis of soil contamination using a portable x-ray fluorescence spectrometer



assessed using XRF screening only rather than using laboratory analysis to provide a more robust result.

The discussion section (section 5) within the IE report does outline limitations with the screening method employed and indicates that there is a potential for variability of results. It also outlines that Industrial SCS's are significantly higher than those encountered as part of the investigation.

The discussion conclusion is therefore generally appropriate to consider that it is *'highly unlikely that the actual soil contamination concentrations exceed the industrial / commercial SCSs'* and that *'due to the background concentrations of most of the metals assessed in this investigation being relatively low, it is considered possible that areas with minor contamination impacts (above background, but below industrial / commercial SCSs) may not be detected.'*

In terms of the assessed contaminants of concern for the site, the report mentions three categories of HAIL activities. Contaminants of concern associated with each activity is not given with potential contamination associated with the storage of containers of engine oil seemingly dismissed without mention of how many containers have been stored or for how long. Whilst the containers noted in the report were small (20L) their condition, location of storage, number and duration are not mentioned. The risk to human health, as stated, may be low however on the provided information the validity of this conclusion cannot be determined.



5 Identified Receptors

5.1 HUMAN HEALTH

Current Land Use:	Firewood production
Current Surface Cover	Open ground – no surfacing
Proposed Land Use	Industrial / Commercial
Proposed Surface Cover	Hardstand and buildings with some landscaping
Soil Type/Underlying Geology	Late Pleistocene River Deposits: light brown sandy, silty gravel

WSP Comments:	Land use change assessment against Industrial is appropriate
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5.2 ECOLOGICAL

Nearest Surface Water Course	Clutha River / Mata-Au; located approximately 930 m south west
Surface Water Uses	source of potable water as well as for recreational, electricity generation and irrigation purposes.
Depth to Groundwater	RL of 141 m above mean sea level; approximately 30 m below ground level.
Groundwater Flow Direction	South west (approx.)
Aquifer Type	Dunstan Flats Aquifer: highly permeable sandy gravel.
Groundwater Used?	Not within 250m of site. (Clyde Railhead Bore is 290m south owned by DoC and used for irrigation and domestic purposes)
On-site Sensitive Ecological Receptors	Not identified

WSP Comments	Groundwater is considered to be a sensitive receptor due to its significant usage within the area. No assessment has been made against Eco-SGV ² with respect to appropriate species protection. Ecological assessment has been based around background concentrations and ground/surface waters
---------------------	--

² Manaaki Whenua/Landcare Research 2023: An implementation framework for ecological soil guideline values



6 Risk Assessment

Sources Identified	Naturally occurring heavy metals
Pathways	Inhalation of dust Dermal absorption (direct contact) Ingestion of soil and / or produce grown in the soil
Identified Receptors	Maintenance / Excavation workers Site workers Current and future residents
Site Characterisation	Visual assessment of the site, as well as XRF screening of soil samples from locations of interest suggest that contamination impacts at the site do not pose a significant risk to human health when developing the site and when undertaking industrial / commercial activities.

WSP Comments	<p>A basic Conceptual Site Model (CSM) has been completed however migration pathways via surface water runoff or through leaching to groundwater have not been mentioned. These pathways may have been discounted, however are not commented on within the CSM or subsequent conclusions.</p> <p>The CSM does not consider ecological receptors within the table with only human health risks assessed.</p>
---------------------	---

6.1 NESCS ACTIVITY STATUS

Report Findings	The report concludes: <i>'Based on the current contamination status of the site, given the potential sources identified, it is considered highly unlikely that there will be a risk to human health if the Zone was changed to industrial / commercial.'</i>
------------------------	--

WSP Comments	<p>No discussion with regards to the applicability of the NESCS is discussed within the report, however the wording of the conclusions implies that the NESCS applies.</p> <p>The human health assessment findings are considered appropriate based on the proposed industrial/commercial land use for the purposes of rezoning.</p>
---------------------	--



7 WSP Discussion & Conclusions

The PSI completed by IE has concluded that minor contamination impacts have occurred because concentrations of one or more heavy metals (arsenic, chromium, lead, nickel and / or zinc) marginally exceed the naturally occurring concentrations in all samples. None of the heavy metals assessed in this investigation were found at concentrations near to the industrial / commercial SCSs. Whilst XRF data is intended for use as a screening tool, hence the submitted report being a PSI rather than a DSI, the results provided, albeit from surface soils only, indicate that risks to human health associated with a change of land use to Industrial/Commercial are low. WSP generally concur with this assessment.

It is noted that no mention has been made during the assessment of the Clyde Cemetery, which is located some 170m from the site and, following expansion plans outlined by CODC in their submission, would adjoin the eastern boundary of the site. Migration potential from the Cemetery HAIL as it currently exists should be considered within the Conceptual Site Model to provide a full picture of risks to human health and the environment on Site.

Notwithstanding the above, the PSI report is generally appropriate in its conclusion that 'Based on the current contamination status of the site, given the potential sources identified, it is considered highly unlikely that there will be a risk to human health if the Zone was changed to industrial / commercial.'

HAIL activities have been noted on site with soil concentrations above background. Whilst no assessment of the applicability of the NESCS is made in the report, it is implied by the assessment against industrial/commercial criteria.

In terms of the proposed plan change 23 where rezoning is proposed, the conclusions are considered appropriate with respect to risks to human health under the NESCS. The report does not however constitute a DSI as defined in CLMG5 and this should be taken into consideration with respect to consenting of future ground disturbance activities in excess of permitted activity volumes under the NESCS.

Whilst some assessment with respect to ecological risks has been completed, the conclusions drawn do not refer to published guidance intended to provide assessment criteria for ecological protections. The conclusions in this respect are therefore limited to professional opinion based on background concentrations, and ground and surface water locations. As the site is proposed for a less sensitive end use however, these conclusions are in all likelihood appropriate. Comments with respect to ORC consent requirements are outside the remit of this review.

RECOMMENDATIONS FOR FURTHER INFORMATION

In terms of NESCS considerations for rezoning of the site under Plan Change 23, no further information is required, with the information provided considered sufficient to assess the risks to human health for a change of land use and subdivision.

Consideration should however be given to consent requirements for any ground disturbance in excess of permitted activity volumes, which may require the submission of additional information depending on the activity status applied for. This additional information could be in the form of a Detailed Site Investigation or Site Management Plan with Unexpected Contamination Discovery Protocols.

Reviewer:

Lisa Bond CEnvP SC
Principal Contaminated Land Consultant





Limitations

This report ('Report') has been prepared by WSP exclusively for Central Otago District Council ('Client') in relation to resource consent application Plan Change 23 and NES-CS assessment ('Purpose') and in accordance with the CODC/WSP Planning & Development Professional Services Panel Agreement. The findings in this Report are based on and are subject to the assumptions specified in the Report and supplied documents referenced herein. WSP accepts no liability whatsoever for any reliance on or use of this Report, in whole or in part, for any use or purpose other than the Purpose or any use or reliance on the Report by any third party.

In preparing the Report, WSP has relied upon data, surveys, analyses, designs, plans and other information ('Client Data') provided by or on behalf of the Client. Except as otherwise stated in the Report, WSP has not verified the accuracy or completeness of the Client Data. To the extent that the statements, opinions, facts, information, conclusions and/or recommendations in this Report are based in whole or part on the Client Data, those conclusions are contingent upon the accuracy and completeness of the Client Data. WSP will not be liable in relation to incorrect conclusions or findings in the Report should any Client Data be incorrect or have been concealed, withheld, misrepresented or otherwise not fully disclosed to WSP.

001

Resource Management Act 1991

Submission on Notified Proposed Plan Change to

Central Otago District Plan

Clause 6 of Schedule 1, Resource Management Act 1991



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

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www.codc.govt.nz



(FORM 5)

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

DETAILS OF SUBMITTER

Name of Submitter: IRAN ALEXANDER MAIL

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(Or alternative method of service under [section 352](#) of the Act)

Telephone: 027 316 4037

Email: iranmary@direct.co.nz

Contact Person: _____
(Name & designation, if applicable)

This is a submission on proposed Plan Change 23 to the Central Otago District Plan (the proposal).

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

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

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

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

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

(Give details, attach on separate page if necessary)





This submission is:

(Attach on separate page if necessary) Include:

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

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

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

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

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



 Signature

19-11-24

 Date

Submissions close in response to proposed Plan Change 23 at 4pm on Friday 17th January 2025

Note to person making submission

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

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

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



002

Resource Management Act 1991

Submission on Notified Proposed Plan Change to Central Otago District Plan

Clause 6 of Schedule 1, Resource Management Act 1991



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(FORM 5)

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



DETAILS OF SUBMITTER

Name of Submitter: Mrs Sanja Collier

Postal Address: 150 Hazlett street Clyde
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Telephone: 022 315 4342

Email: vaughsanja@kinect.co.nz

Contact Person: Me
(Name & designation, if applicable)

This is a submission on proposed Plan Change 23 to the Central Otago District Plan (the proposal).

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

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

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

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

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

(Give details, attach on separate page if necessary)

Drop in House Prices because of
The Extra Noise Pollution, Vehicle pollution
that this proposal will create is Unacceptable!
Traffic Congestion will cause accidents!





This submission is:

(Attach on separate page if necessary) Include:

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

Oppose All of Application; Traffic Congestion - Accidents! Pollution!!! Drop in House Price!!!

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

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

Not to move forward in any way with this proposed changes

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

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

[Signature]
Signature

20 November 2024
Date

Submissions close in response to proposed Plan Change 23 at 4pm on Friday 17th January 2025

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Resource Management Act 1991

Submission on Notified Proposed Plan Change to

Central Otago District Plan

Clause 6 of Schedule 1, Resource Management Act 1991

(FORM 5)

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



DETAILS OF SUBMITTER

Name of Submitter: Ian Gray

Postal Address: 65 Young Lane.
(Or alternative method of service under [section 352](#) of the Act)

Telephone: 0224017696

Email: ianandlyngray@gmail.com

Contact Person: Ian
(Name & designation, if applicable)

This is a submission on proposed Plan Change 23 to the Central Otago District Plan (the proposal).

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

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

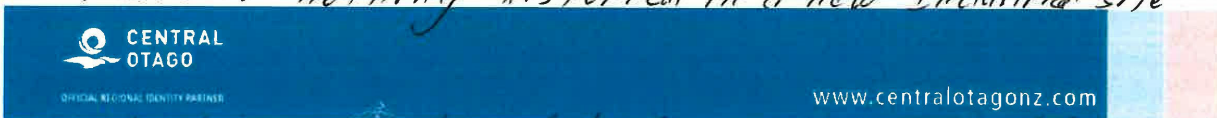
- (a) adversely affects the environment; and
- (b) does not relate to trade competition or the effects of trade competition.

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

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

(Give details, attach on separate page if necessary)

We do not need an industrial centre in Clyde. This will spoil the entrance into Clyde. Come and visit our beautiful "Historic" Clyde. There is nothing historical in a new Industrial site



We have a good industrial area in Boundary Rd Alexandra only 8 k's away. (Keep Clyde as it is.)



This submission is:

(Attach on separate page if necessary) Include:

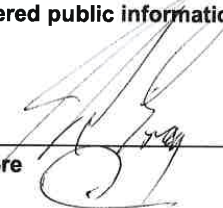
- whether you support or oppose the specific parts of the application or wish to have them amended; and
- the reasons for your views.

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

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

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

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

Signature 

Date 8/12/24

Submissions close in response to proposed Plan Change 23 at 4pm on Friday 17th January 2025

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004 Resource Management Act 1991

Submission on Notified Proposed Plan Change to

Central Otago District Plan

Clause 6 of Schedule 1, Resource Management Act 1991



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(FORM 5)

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

DETAILS OF SUBMITTER

Name of Submitter: Central Otago District Council

Postal Address: 1 Dunorling Street, Alexandra

(Or alternative method of service under [section 352](#) of the Act)

Telephone: 027 210 6435

Email: gordon.bailey@codc.govt.nz

Contact Person: Gordon Bailey Parks and Recreation Manager

(Name & designation, if applicable)

This is a submission on proposed Plan Change 23 to the Central Otago District Plan (the proposal).

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

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

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

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

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

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

(Give details, attach on separate page if necessary)

As noted in the Landscape Effects Assessment Report - 5 June 2024 the undeveloped section of the Clyde Cemetery

will potentially be an immediate neighbour to the proposed development. It appears the applicant maybe unaware of the approved concept plans for developing this part of the Clyde Cemetery. Attached is the formal report to the

Vincent Community Board of January 2021 and the approved Clyde Cemetery Extension Development Plan 17 November 2020.



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**This submission is:**

(Attach on separate page if necessary) Include:

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

While it is acknowledged that the Cemetery is an important community facility, page 11 indicates the cemetery is 170m from the development. In fact the extension is immediately adjacent. As a working cemetery Clyde cemetery users must be afforded sufficient dignified privacy at all times. For mourning and particularly during funeral services. The proposed landscape buffer may not deliver this - being on private land there is no guarantee a buffer will be maintained in perpetuity. The Cemetery Plan also indicates a stone wall along the boundary of the development.

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

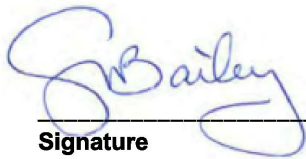
(Give precise details, including the general nature of any conditions sought)

Certainty that Buffer Plantings will be maintained to ensure plants thrive in perpetuity. Adequate stonewall boundary fence. Adequate setbacks for activities to ensure dignified privacy is maintained by cemetery users.

This may require certain noise or activity restrictions being required during times of funeral services.

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

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



Signature

7 January 2025

Date

Submissions close in response to proposed Plan Change 23 at 4pm on Friday 17th January 2025

Note to person making submission

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CLYDE CEMETERY EXTENSION

DEVELOPMENT PLAN

17 NOVEMBER 2020



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INTRODUCTION

BACKGROUND

Clyde Cemetery is located on Springvale Road, east of the main Clyde settlement. Refer to **Figure 1** opposite. The land designated as the cemetery is split into two distinct areas - the existing walled cemetery to the east and undeveloped field to the west - the 'Development Area', which is the main focus of the development plan. **Figure 2** illustrates this divide and the 'Development Area'.

A development plan is required by the Central Otago District Council (CODC) for the 'Development Area' at Clyde Cemetery.

With an average of 14 burials per year and over 300 empty plots, new beams have recently been installed in the northwestern quadrant of the existing developed area of the cemetery to guide plot management and sales.

The remaining southwest, south east and northeast quadrants of the existing cemetery are near or at capacity, with graves dating back to the 1860s when the cemetery was established. Many graves are unmarked and some ground penetration radar has been undertaken recently to improve burial records and ensure appropriate maintenance and management. Significant work has also been carried out to identify notable figures from Clyde's past and those buried in unmarked graves. Interpretation panels with information about these people can be found in the cemetery grounds.

Figure 3 provides an overview of burials within the existing cemetery. Red represents occupied plots, green is empty plots, yellow is reserved, and purple are those that have missing information.

Archaeology advice provided for the new beams and removal of poplar trees on the outside of the west and north cemetery walls indicates the possibility of further unmarked graves in the 'Development Area' adjacent to the west stone wall.

Maintenance and sexton duties are contracted through Delta Infrastructure Services Ltd with Council managing the allocation of plots and compliance with the requirements of the Burial and Cremation Act.

PURPOSE

The purpose of the development plan is to enable the early establishment of a tree framework and other infrastructure in the 'Development Area' prior to the implementation of future beams and burial plots. Although the need to use the 'Development Area' for burials is not imminent, the development plan will be key to avoiding clashes, the need for tree removal and maximising future use of space.

This development plan considers and includes:

- Existing burial methods and standards as well as flexibility for burial practices not commonly carried out in the area at present, such as Muslim burials. Due to the existing site conditions and environment, natural burials have not been considered in this development plan.
- Maximising capacity for burials on the site.
- Site security, pest exclusion and management, specifically rabbits
- Access, traffic circulation and parking
- Irrigation and water supply given the site is not irrigated (currently), and there are no existing water connections or water utilities in proximity
- Preservation of the existing stone fencing, and the heritage listing of the site including existing protected trees as per the Central Otago District Plan.
- Screening of the adjacent property to the west of the cemetery
- Shelter, shade and rest spaces
- Cultural requirements
- The requirements of the CODC Cemeteries Strategy 2009:
 - This development plan is an identified action from the Cemeteries Strategy
 - *Part 1.5 What Matters* of the Cemetery Strategy, outlines key elements that CODC cemeteries should incorporate:
 - Tidy open space
 - Reflective spaces, shade, seating and shelter
 - Access with no trip hazards
 - Peace and quiet
 - Information available concerning people interred
 - Water available for users to keep plants and flowers fresh
 - Know which areas are available for use
 - Litter free

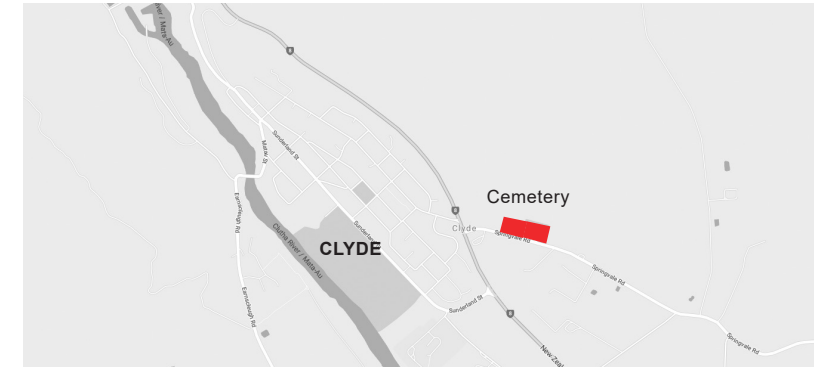


Figure 1: Location of the Cemetery within Clyde Township



Figure 2: Clyde Cemetery Boundary



Figure 3: Existing Cemetery Burials

SITE HISTORY

The cemetery was established in 1865 on the outskirts of the historic gold mining town of Clyde. Its original Victorian design was an intricate layout, divided along horizontal and vertical axis as shown in **Figure 4** opposite, with the eight main sections organised according to religious denomination. As other cemeteries were opened in the new gold mining centres around the district, Clyde cemetery was not developed to the full area originally proposed and reduced to the eastern half of the designated land. The original intricate design layout was followed for a short time before burial plots were arranged in a more linear pattern.

Throughout the mid 20th century management and maintenance of the cemetery diminished - headstones were damaged and graves overgrown sheep introduced for grazing and rabbits became and continue to be a pest problem. Restoration and preservation of the site gained momentum in the 1990s.

Due to the age of the site some headstones have degraded and are missing or in a poor state. The northeastern quadrant of the cemetery includes a vast number of unmarked graves.

A stone cairn, built on the highest point of the cemetery, was unveiled in December 2012 and serves as a memorial to early European and Chinese miners who are buried in unmarked graves. A memorial to Servicemen and women is located next to this, and a memorial to unborn children is also located near the main gates into the existing cemetery.

The site's history and heritage is recognised with the cemetery and schist walls registered as a Heritage Place in the Central Otago District Plan. Three trees within the existing cemetery - an Umbrella/Stone Pine (*Pinus pinea*) Maritime Pine (*Pinus pinaster*) and Scots Pine (*Pinus sylvestris*) are also listed as Notable Trees in the district plan.

As part of preservation works in the 1990's, the stacked schist stone wall was repaired. An access gate through the wall linking the undeveloped cemetery land to the west has also been previously removed and filled with additional stone work.

A former agricultural water race is also situated adjacent to the northern boundary of the site. It is no longer in use, but is a prominent feature visible in the landscape next to the cemetery.

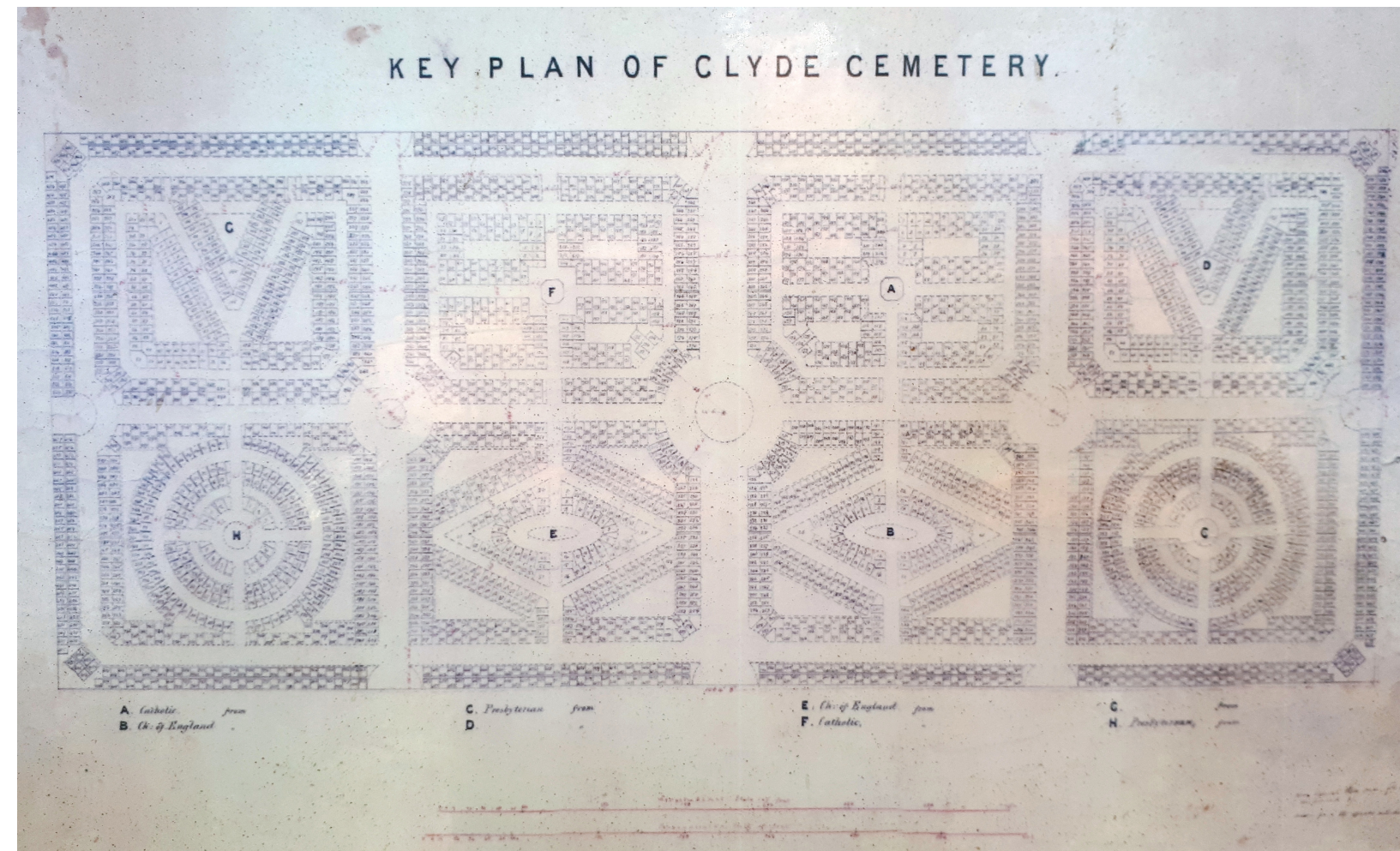


Figure 4: Original Cemetery Design



Figure 5: View over the Cemetery from the Northern Boundary

DEVELOPMENT PLAN PROPOSAL LAYOUT

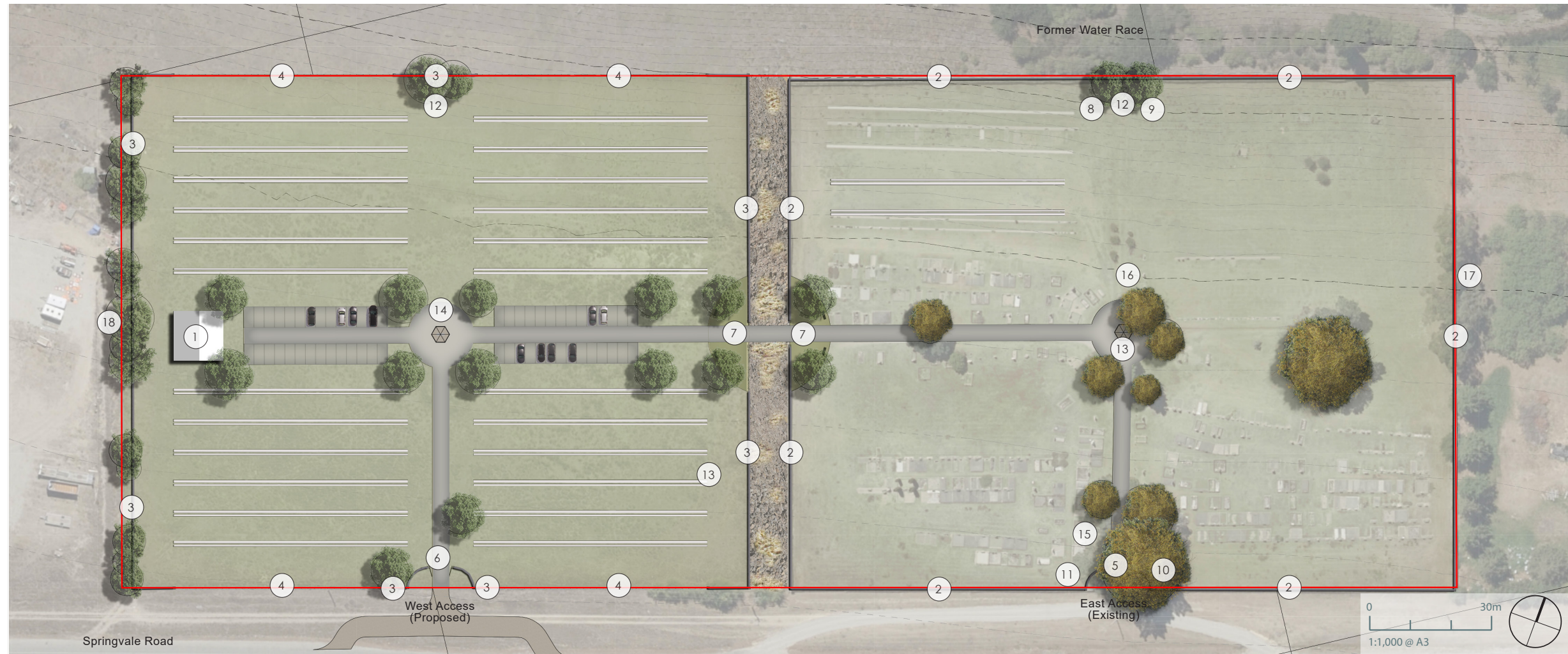


Figure 6: Development Plan Proposed Layout

DEVELOPMENT PLAN LAYOUT

The proposed development plan layout addresses the unique heritage and management aspects of the existing Clyde Cemetery, while planning for the new cemetery development area adjacent. The proposed layout references the original cemetery design from the 1860's, while providing dedicated areas for new burials based on current trends and flexibility for burials that are not common practice. For example, a section of the new development area could easily be allocated for Muslim burials if they were to become more prevalent in the Clyde area.

Other elements of the layout that are integral to the development plan include burial plot layout, access and car parking, walling / fencing and integration between the old and new cemetery areas, planting strategy, and the provision of amenity and utility features.

LEGEND

- EXISTING & EXTENDED VEHICLE AND PEDESTRIAN ACCESS LINK
- PROPOSED BEAMS / BURIAL PLOTS
- EXISTING TREES
- PROPOSED TREES
- CEMETERY INTERFACE GROUNDCOVER PLANTING
- GAZEBO / SHELTER
- PROPOSED CAR PARKING

KEY

- 1. Maintenance/Storage/Utility Enclosure, Rainwater Collection Storage Tank Central, Litter Bin and Shelter with Information Board
- 2. Existing Heritage Wall
- 3. Proposed Stacked Stone Schist Wall
- 4. Proposed Open Style Post and Wire Fence
- 5. Existing Gate
- 6. Proposed Vehicle Access Gate
- 7. Proposed Cemetery Link Gate
- 8. Existing Returned Services Monument
- 9. Existing Chinese Miner Memorial
- 10. Existing Memorial
- 11. Existing Seat / Bench
- 12. Proposed Bench Seat
- 13. Existing Shelter Gazebo and Bench
- 14. Proposed Shelter Gazebo and Bench
- 15. Existing Information Board
- 16. Existing Burial Information Board
- 17. Adjacent Existing Screen Planting
- 18. Proposed Screen Planting
- 19. Existing / Proposed Cemetery Link Path and Lawn with Shelter Tree Planting and Bench Seats

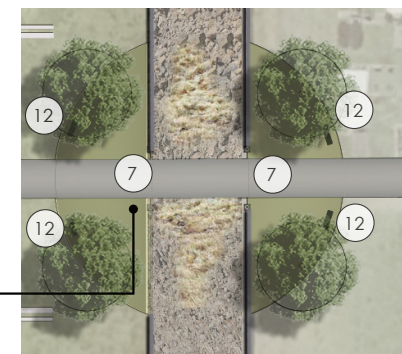


Figure 7: Cemetery Link Lawn and Gates

DEVELOPMENT PLAN PROPOSAL PERSPECTIVE



Figure 8: Development Plan Proposed Layout Perspective

DEVELOPMENT PLAN LAYOUT

The perspective image above illustrates the proposal to maintain the existing cemetery in a largely unchanged state and the development of the new cemetery area in a way that complements the heritage and landscape / amenity values of the existing cemetery.

Key elements in the new development area include designated parking spaces and a dedicated utility / storage shelter which would provided for maintenance storage needs, provide a larger water collection and storage facility and visitor shelter with space for information and interpretation panels.

It also shows the central planted strip that provides the interface between the existing cemetery and development area.

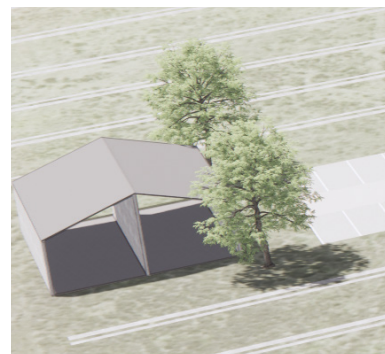


Figure 9:
Proposed Utility Structure / Shelter



Figure 10:
Proposed Utility Structure / Shelter



Figure 11:
Cemetery Link Lawn and Gates, Shelter Trees and Seating

PROPOSED BEAM AND BURIAL PLOT ARRANGEMENT

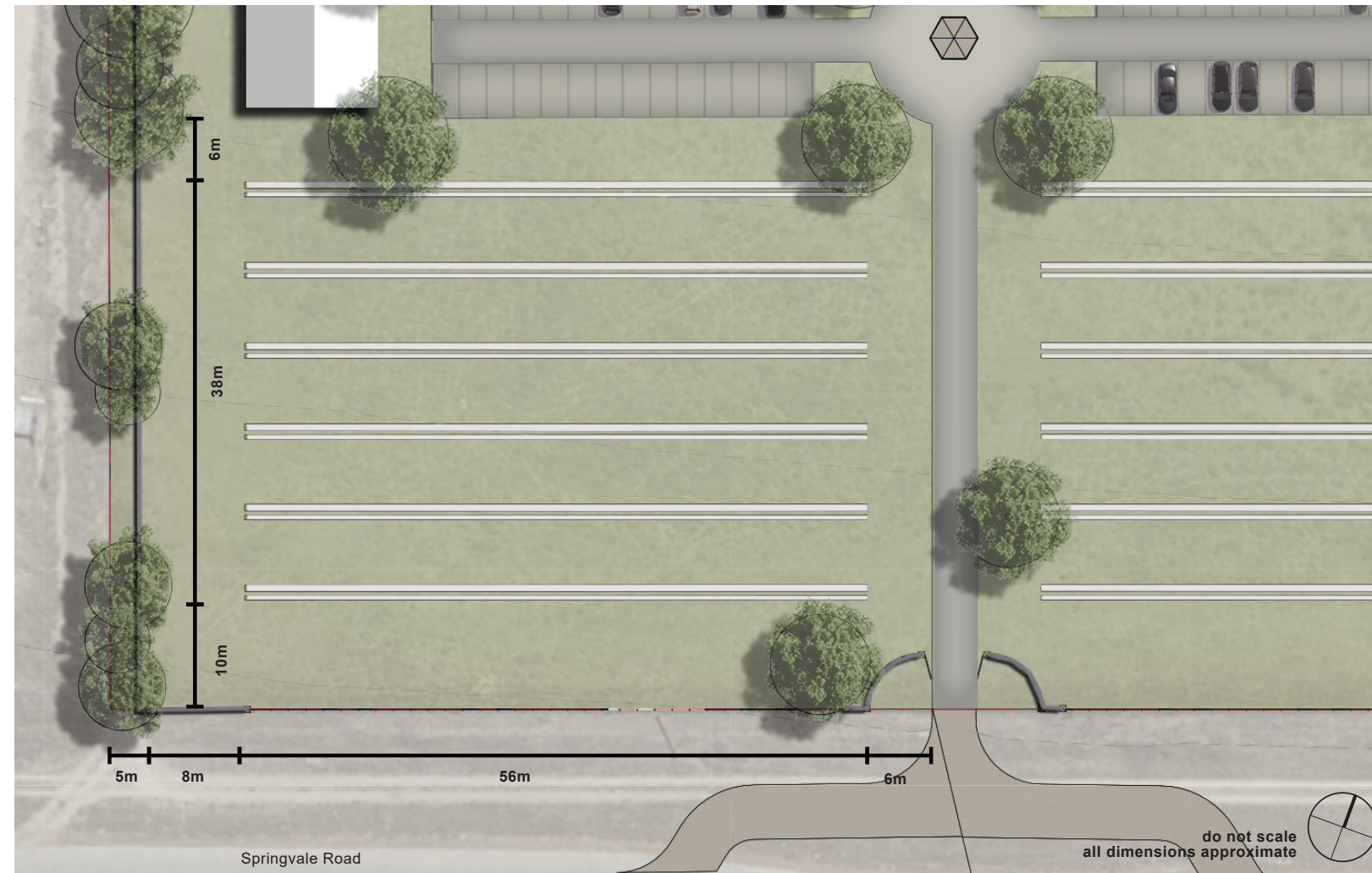


Figure 12: Beam Layout

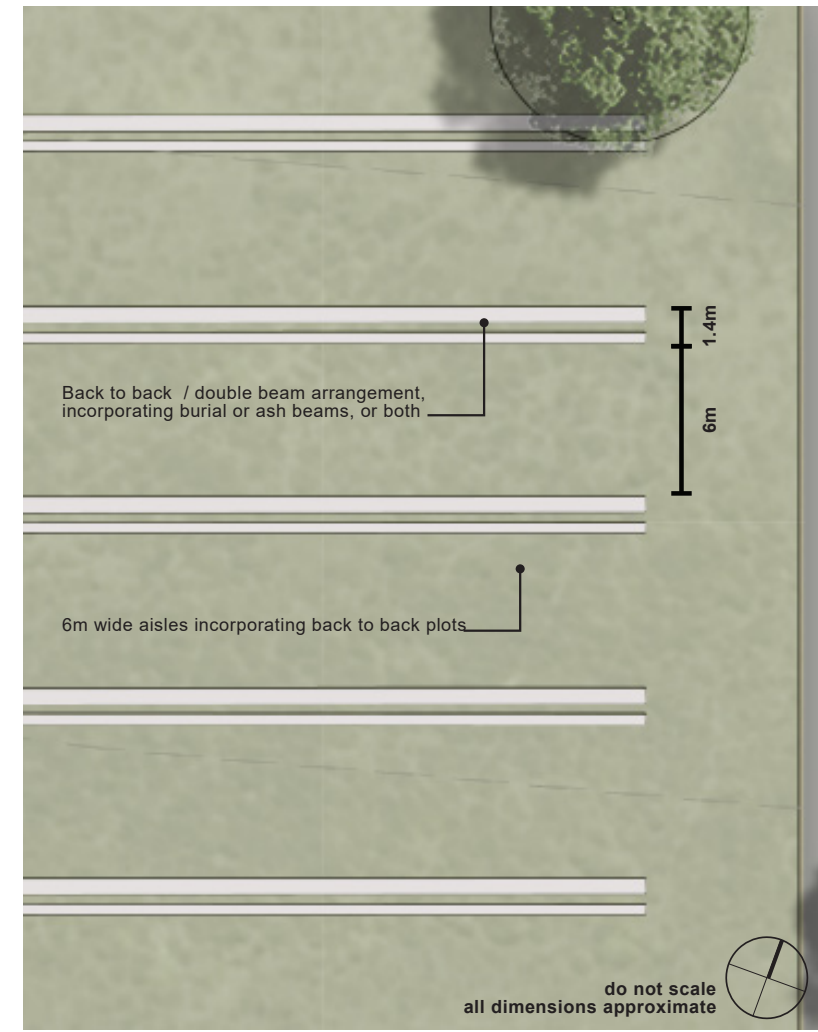


Figure 13: Detail Beam Layout

BEAM AND BURIAL PLOT LAYOUT

Building on the basic hierarchy of the original Clyde Cemetery plan, the development area can be split into four quarters.

This provides flexibility for full burial plot beams or ash beams. For the purposes of the development plan, beams are shown as back to back burial plots.

The layout of the development area also provides flexibility for future changes in interment trends or future cultural needs such as a specific Urupa for Iwi or dedicated Muslim burial area.

The four quarter layout, along with defined vehicle access and parking spaces enable a simpler division of where maintenance vehicles can access grassed areas, which won't be accessible to public vehicles.

Public vehicle access should be maintained into the existing cemetery while interments continue. Once this part of the cemetery is effectively 'closed' for new burials in the future, the proposed development plan provides a range of options for access that include maintenance vehicle access only to the 'old' cemetery, with all public access and parking in the new development area.

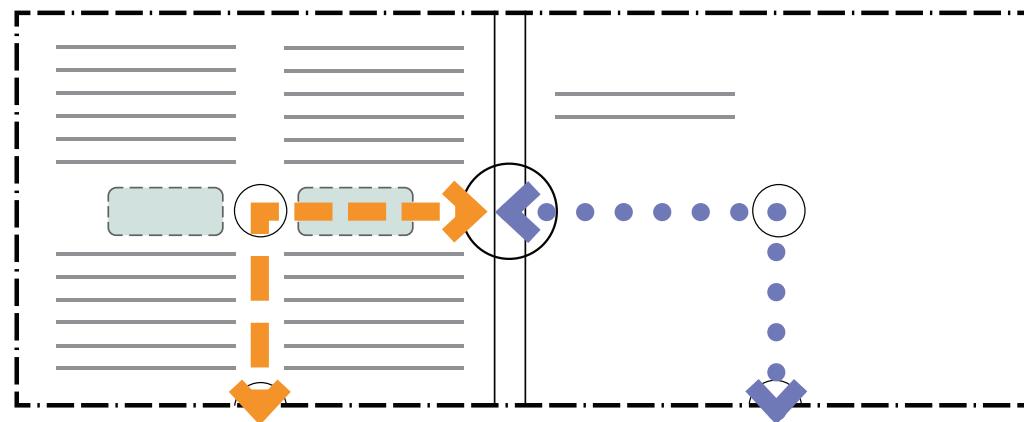


Figure 14: Single Row Burial Beam in Existing Cemetery

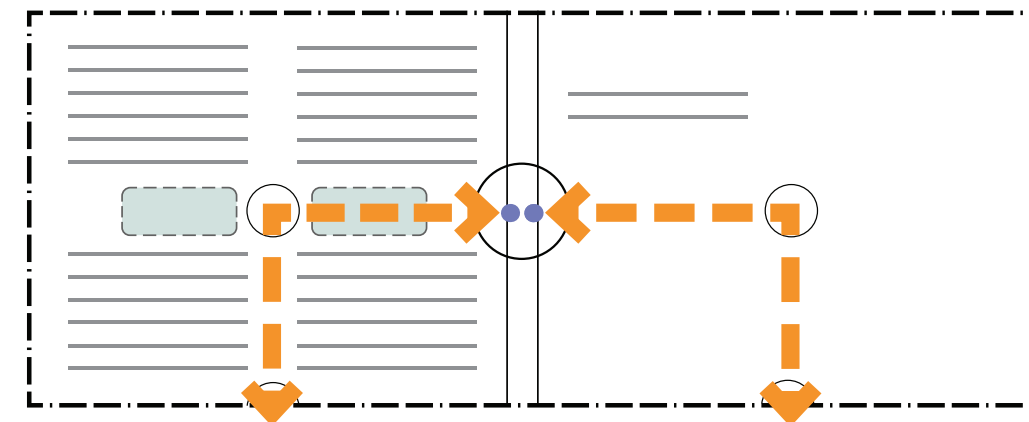


Figure 15: Ash Beam at Roxburgh Cemetery

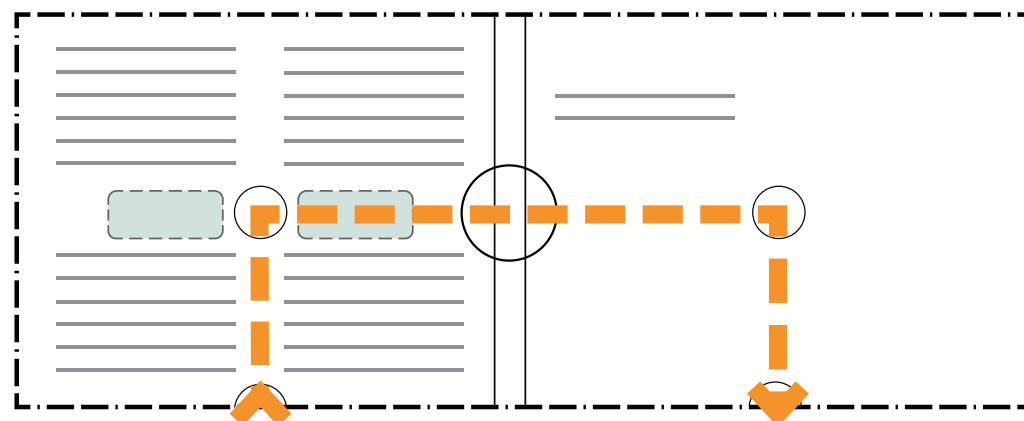
PROPOSED ACCESS AND VEHICLE PARKING



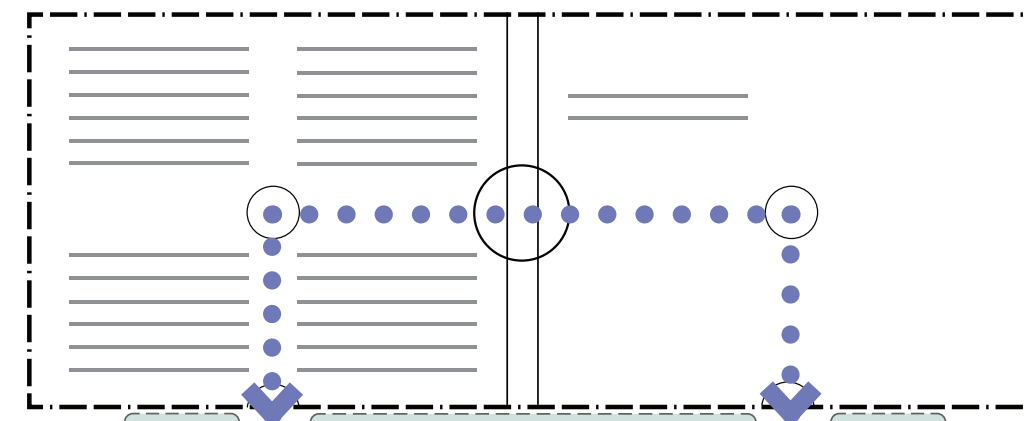
Option A:
Vehicle access into and car parking located in newly developed cemetery area, pedestrian access through central link, pedestrian and maintenance vehicle access only to existing cemetery area



Option B:
Vehicle access to both newly developed and existing cemetery areas, pedestrian access only at central link, formal car parking in newly developed cemetery only with existing informal parking in the existing cemetery. Additional parking located in the central west area.



Option C:
Vehicle access to both the newly developed and existing cemetery areas, including through the central link, formal parking within the newly developed cemetery area



Option D:
Pedestrian access to both the newly developed and existing cemetery areas only, with formal located outside the cemetery on the berm of Springvale Road

ACCESS OPTIONS

The proposed development plan layout provides a range of options for public vehicle access in the existing cemetery and development area, which are show above.

Vehicle access between the two areas will require more significant alternations to the existing stone wall on the west side of the existing cemetery, whereas a pedestrian link can be accommodated by reinstating the former gate illustrated in Figure 18.

Option A or B above are preferable, with a progression from Option B to Option A over time as the existing cemetery is closed to new burials. This will assist with maintaining the heritage status of the existing cemetery and limiting vehicle access for maintenance and servicing only. Alternatively, Option C a safe 1 way system with access retained to all of the cemetery.

LEGEND




-  VEHICLE ACCESS
-  TRAFFIC DIRECTION
-  PROPOSED PARKING
-  PEDESTRIAN ACCESS



Figure 16:
Entry Road to Existing Cemetery



Figure 17:
Access Road within Existing Cemetery



Figure 18:
Former gate location to be reintroduced as central gate link to new cemetery area

PROPOSED AND EXISTING HERITAGE STONE WALLING

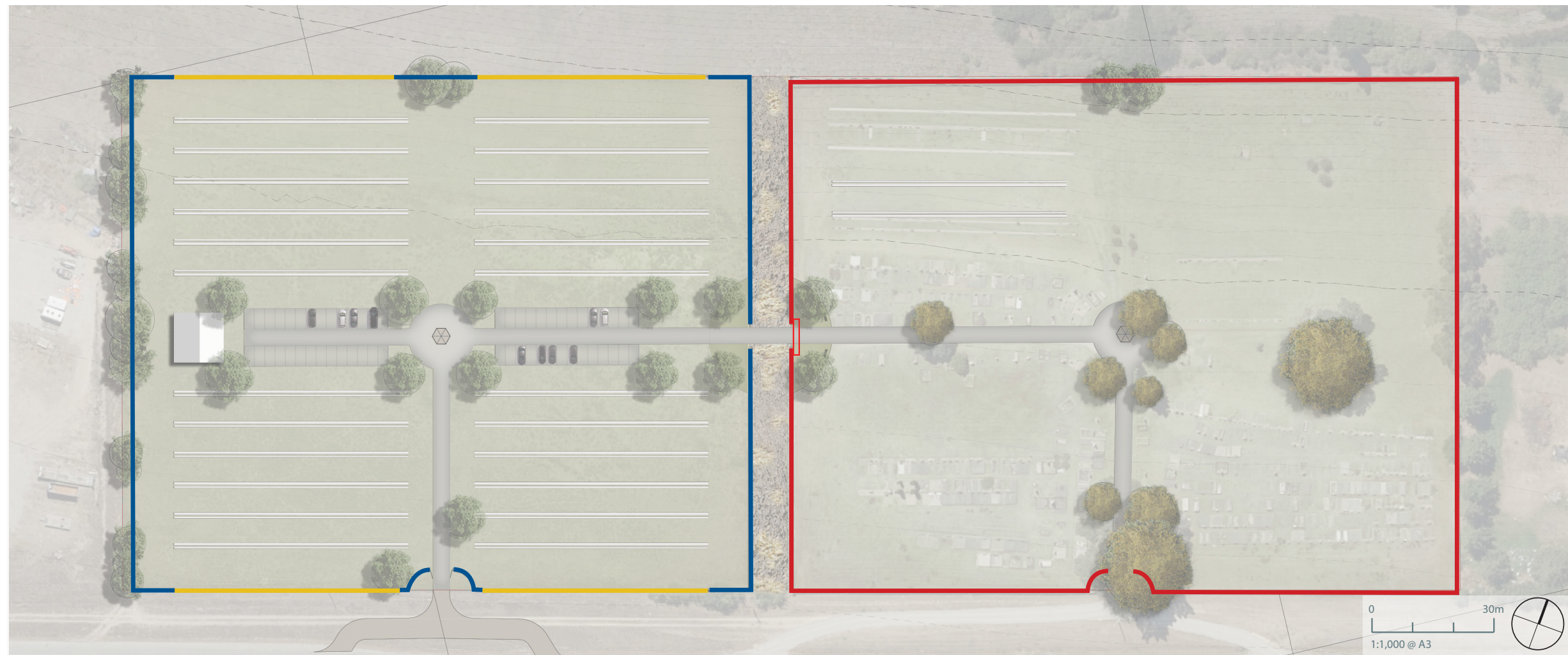


Figure 19: Proposed Stone Wall Layout

WALLING, GATES AND FENCING

The stone walls to the perimeter of the existing cemetery should be maintained in their current condition with the exception of reinstating the gate through the western wall to the development area. This will likely require a resource consent and HNZ consultation.

New stacked schist walls would define the east and west boundaries of the new cemetery area, along with key sections on the north boundary and at the vehicle entrance to the development area. Stacked schist stone walling is a key element to tie the 'new' to the 'old' cemetery and visually define the whole cemetery area.

Open style post and wire, with rabbit / pest protection barriers are proposed as infill on the north and south boundaries and provide visibility into the new cemetery area, as well as a visual cue that the development are differs from the existing cemetery.

LEGEND





-  EXISTING HERITAGE STONE WALL
-  EXISTING STONE WALL TO BE REINSTATED AS A GATE
-  PROPOSED STONE WALL
-  PROPOSED OPEN STYLE POST AND WIRE FENCING (INCLUDES RABBIT / PEST PROTECTION)



Figure 20: Former gate location to be reintroduced as central gate link to new cemetery area



Figure 21: Existing western stone wall, looking north



Figure 22: Existing stone wall to Springvale Road frontage

LANDSCAPE PLANTING STRATEGY



Figure 23: Proposed Tree Planting Layout

PLANTING STRATEGY

The planting strategy has been developed to complement the existing 'lawn cemetery' aesthetic. The proposed exotic trees in development area have been placed to reflect the random, informal locations of those in the existing cemetery and are species that will suit the site conditions. Likewise, screen planting species at the west end of the site have been selected for their suitability at this site.

A ten metre wide planted space between the 'old' and 'new' cemetery areas is proposed. Previous archaeology advice indicates there are likely to be unmarked graves on the outside of the existing cemetery wall and the planted strip provides a space that with minimal ground interference in this area. A 'dry' garden spaces incorporating schist gravel and rocks as well as endemic grass species are proposed, referencing the types of

plants that would have grown in the area before modification and 'tying' the existing and new development cemetery areas back to the land.


Two trees, for shelter, are proposed adjacent to the north boundary of the existing cemetery area close to the two memorials. This location provides good views back down over the entire cemetery.

Existing stumps adjacent to the existing west wall should be removed. Archaeological advice and observation should be sought when undertaking this work.

All planting, including trees, will require watering for two to three years after planting as they establish. This will need to be incorporated in to maintenance works and also relies on the installation of water storage on site.

LEGEND

-  EXISTING TREES
Includes three notable trees listed in the CODC District Plan within the existing cemetery - an Umbrella/ Stone Pine (*Pinus pinea*) Maritime Pine (*Pinus pinaster*) and Scots Pine (*Pinus sylvestris*)
-  CEMETERY INTERFACE 'DRY' GARDEN
30% coverage native grasses amongst 70% schist gravel and rock coverage, including Hard Tussock (*Festuca novae-zelandiae*), dwarf Toe toe (*Chionochloa flavicans*) and Silver Tussock (*Poa cita*)

-  PROPOSED TREES
- 1. Screen planting including Mikimiki (*Coprosma crassifolia*), Kāpuka / Broadleaf (*Griselinia littoralis*), Tarata / Lemonwood (*Pittosporum eugenioides*), Kānuka / Dryland Kanuka (*Kunzea serotina*), Kōhūhū / Black Matipo (*Pittosporum tenuifolium*)
- 2. Freeman's Maple (*Acer x freemanii*)
- 3. Scots Pine (*Pinus sylvestris*)
- 4. Maritime Pine (*Pinus pinaster*)
- 5. Stone Pine (*Pinus pinea*)

CULTURAL, AMENITY AND UTILITY FEATURES - EXISTING AND PROPOSED



Figure 24: Cultural, Amenity and Utility Features Layouts

CULTURAL, AMENITY AND UTILITY FEATURES

Proposed amenity and utility features in the new development include a dedicated utility / storage shelter for maintenance storage needs, water collection and storage and visitor shelter with space for information and interpretation panels.

Seating and shade, provided by gazebo structures and trees are proposed at key locations in the development area, as well as the existing cemetery. These should be provided, with vehicle access being limited to access roads and parking areas.

Facilities that recognise and cater for Māori cultural values should also be incorporated. The concept of wahi tapu and ability for visitors to wash their hands when leaving an urupa or cemetery is an important Māori

custom. Washing facilities should be provided at the main access points into the existing cemetery and development area. Water to the locations will need to be supplied from the on site collection and storage areas.

KEY

1. Maintenance/Storage/Utility Enclosure, Rainwater Collection Storage Tank Central, Litter Bin and Shelter with Information Board
2. Existing Shelter Gazebo and Bench
3. Proposed Shelter Gazebo and Bench
4. Shade Trees and Seating / Rest Area
5. Existing Seat / Bench
6. Proposed Bench Seat
7. Existing Information Board
8. Existing Burial Information Board
9. Urupa Hand Washing Facilities



Figure 25
Existing gazebo shelter, seat and water tank

PEST CONTROL

Given the open nature of the existing cemetery and development area, pest control, particularly rabbits, will continue to be a challenge in the management and maintenance of Clyde Cemetery.

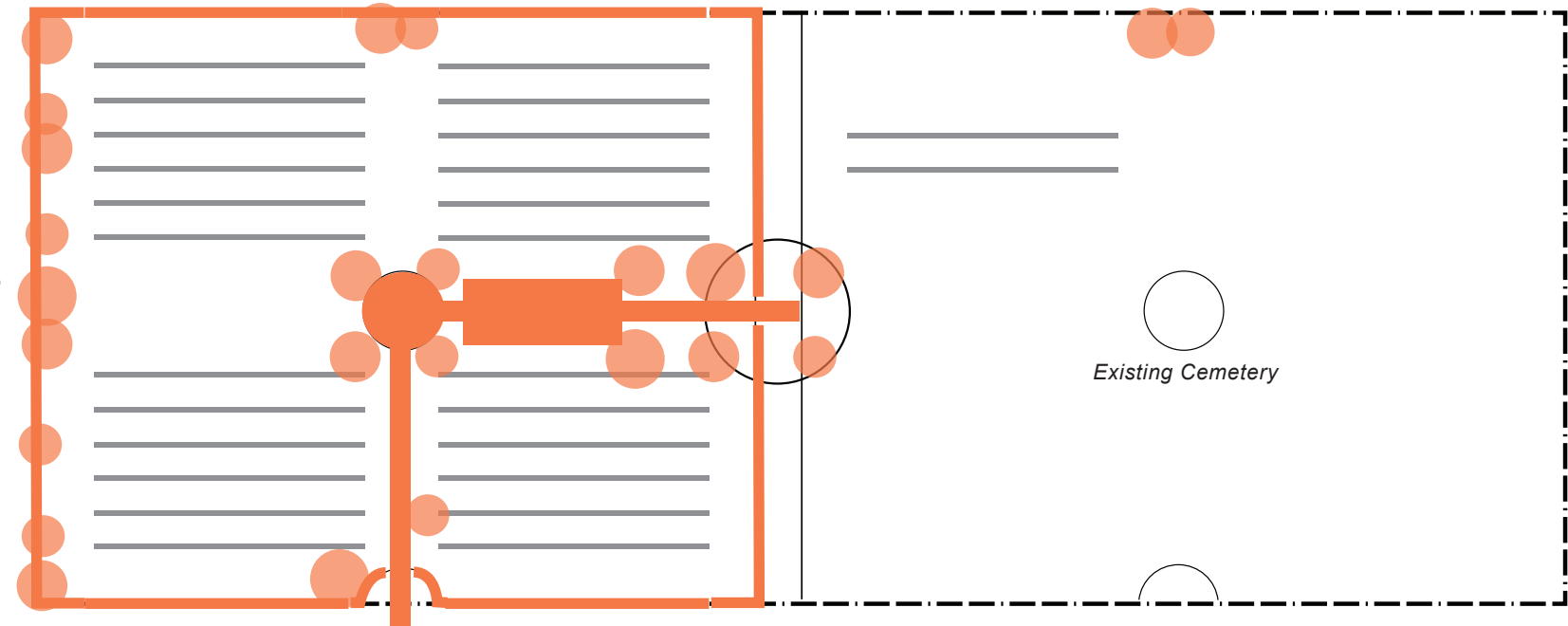
The current use of Pindone Pellets is effective and should be continued.

Boundary fencing and gates can be considered a deterrent and pest protection should be incorporated into open style wire fencing and steel access gates, however effectiveness as a control is limited.

Gates could be closed to attempt to limit pest access, but this is largely reliant on the public closing gates after visiting the cemetery. There is also anecdotal evidence that rabbits are able to scale and jump the existing stone walls

Due to the location of the cemetery, controlling rabbit numbers by shooting is not recommended

IMPLEMENTATION RECOMMENDATIONS/ STAGING



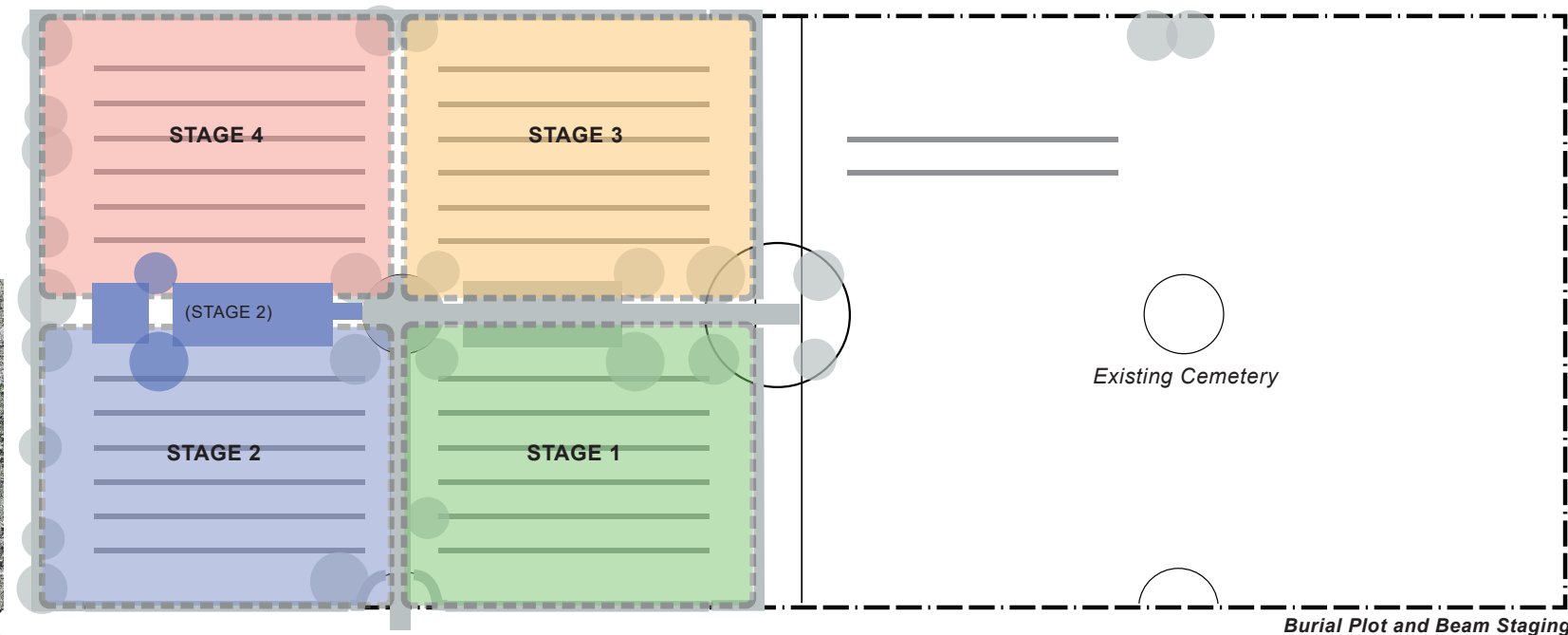
Initial Implementation Works
Establish the main frame of the cemetery extension by building the additional wall sections, fences, access road and eastern car park area..
Specimen trees, screen planting and dry garden between cemetery areas implemented.



Figure 26
Rabbit burrows in grave enclosure



Figure 27
Rabbit droppings visible within the cemetery grounds



Burial Plot and Beam Staging

About Boffa Miskell

Boffa Miskell is a leading New Zealand professional services consultancy with offices in Auckland, Hamilton, Tauranga, Wellington, Christchurch, Dunedin and Queenstown. We work with a wide range of local and international private and public sector clients in the areas of planning, urban design, landscape architecture, landscape planning, ecology, biosecurity, cultural heritage, graphics and mapping. Over the past four decades we have built a reputation for professionalism, innovation and excellence. During this time we have been associated with a significant number of projects that have shaped New Zealand's environment.

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19 January 2021

21.1.2 CLYDE CEMETERY DEVELOPMENT PLAN

Doc ID: 519915

1. Purpose of Report

To consider the Clyde Cemetery Development Plan.

Recommendations

That the Vincent Community Board

- A. Receives the report and accepts the level of significance.
- B. Approves the Clyde Cemetery Development Plan.
- C. Notes that the draft 2021 – 2031 Long Term Plan provides for the developed design and costing phases for plan implementation in future years.

2. Background

Funding was set aside in the 2018 – 2028 Long Term Plan to complete a development plan for the Clyde Cemetery extension area to provide for future demand.

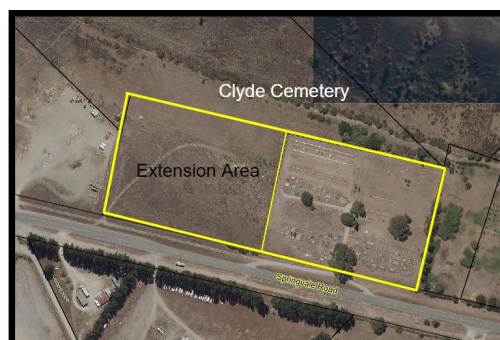


Figure 1: Showing extension area

Boffa Miskell Limited were engaged to complete a concept Clyde Cemetery Development Plan (**Appendix 1**). The design of the extension has been produced in line with the historic character of the operational cemetery.

The design has been influenced by site-specific factors such as current and predicted burial trends, cultural requirements, the geography of the site, the need to provide for workable pedestrian and vehicular circulation, and the arid environment of Central Otago.

The design also takes cues from the materials, layout, and tree species in the existing operational site which ensures a sound connection between the cemetery's past and its future.



Figure 2: Development Plan Perspective

The concept, if approved, will provide the framework for a second phase of work to develop the design for costing and implementation, as demand and resources permit, through future long term plans.

3. Discussion

Established in 1865, the Clyde cemetery has had several design iterations in its life and many variations in burial practice. This has created the existing layout which includes a large area of unmarked graves.

With an average of 14 burials per year and over 300 empty burial and ashes plots available, the development of the extension area is not urgent; however, planning for and commencing with the structural planting will ensure the extension is available with a pleasant level of amenity when it is required to be opened up.

Provision is also made for unexpected events such as a pandemic or a large natural disaster along with population growth and an aging population which will affect burial averages.

Committing or approving this plan at this point, ahead of when the site is required, simply cements the structure for the site. It will guide the planning and decision making in the future, including when long term plans are developed.

Approving the concept allows for implementation in a timely and planned way, but crucially does not bind Council to future budgets or timing – plans such as these can only be implemented to the extent that the Council resources permit.

4. Options

Option 1 – (Recommended)

Approve the concept design

Advantages:

- Allows meaningful planning and budgeting for the development in the future, particularly in future long-term plans, without necessitating commitment at this stage.

Vincent Community Board meeting Agenda

19 January 2021

- Allows potential to establish strong amenity values before the site is required for burials.
- Reflects the direction contained in the Cemetery Strategy 2010.

Disadvantages:

- No disadvantages to this option.

Option 2

Do not approve the concept design

Advantages:

- No advantage to this option

Disadvantages:

- Does not allow for resources to be allocated to the project in future long-term plans.
- Limits the potential to establish strong amenity values before the site is required for burials.
- Does not reflect the direction contained in the Cemetery Strategy 2010.

5. Compliance

Local Government Act 2002 Purpose Provisions	This decision promotes the social, cultural, and environmental wellbeing of communities, in the present and for the future by planning and providing for future burial needs in the community.
Financial implications – Is this decision consistent with proposed activities and budgets in long term plan/annual plan?	Yes. Funding is proposed to be included in the Draft 2021 – 2031 Long Term Plan to develop the design for costing and implementation in a staged fashion.
Decision consistent with other Council plans and policies? Such as the District Plan, Economic Development Strategy etc.	Yes. Expanding the cemetery aligns with the provisions of the Cemetery Strategy 2010.
Considerations as to sustainability, the environment and climate change impacts	No implications through this decision.
Risks Analysis	Risk associated with this decision is negligible.
Significance, Consultation and Engagement (internal and external)	As the design aligns with legislative requirements and best practice for cemetery layout, it is considered not necessary to consult on this concept plan nor the expansion of cemetery activities into the site. It is well-known in the community that this area of land is set aside for the Clyde cemetery future expansion. Internally, Council's Infrastructure department is a key partner for consultation in the project and roadway design, due to the extension requiring

	<p>access off Springvale Road.</p> <p>Advice has been received that the additional access onto the road is appropriate with a preference for no more than three points of entry. In the future, input and advice will be required from Heritage New Zealand, Council's Planning Department, consulting archaeologists, and Tangata Whenua in the developed design and construction phases of the project.</p> <p>The public are likely to have an interest, which can be accommodated in the implementation part of the project.</p>
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6. Next Steps

The next step, to develop the design, is subject to funding confirmation in the 2021 – 2031 Long Term Plan.

7. Attachments

Appendix 1 - Clyde Cemetery Development Plan

Report author:


Marie Gordon
Parks Officer - Projects

16/12/2020

Reviewed and authorised by:


Louise van der Voort
Executive Manager - Planning and
Environment
6/01/2021

RECEIVED
10/01/2025
CODC



005

FORM 5, CLAUSE 6 OF SCHEDULE 1, RESOURCE MANAGEMENT ACT 1991

Submission on proposed Plan Change 23 – Hartley Road Partnership

To: **The Chief Executive**
Central Otago District Council
PO Box 122
Alexandra 9340
Via email: districtplan@codc.govt.nz

Name of submitter: NZ Transport Agency Waka Kotahi

Address for Service: Attention: Nick Reuther
PO Box 1479
Christchurch 8011
Phone: (03) 741 8553
Email: EnvironmentalPlannibg@nzta.govt.nz & Nick.Reuther@nzta.govt.nz

1. This is a submission on the following:

Proposed Plan Change 23 – Hartley Road Partnership (PC23) to the Central Otago District Plan.

2. NZ Transport Agency Waka Kotahi (NZTA) could not gain an advantage in trade competition through this submission.

3. Role of NZTA:

NZTA is a Crown entity with its functions, powers and responsibilities set out in the Land Transport Management Act 2003 (LTMA) and the Government Roding Powers Act 1989. The primary objective of NZTA under Section 94 of the LTMA is to contribute to an effective, efficient and safe land transport system in the public interest.

An integrated approach to transport planning, funding and delivery is taken by NZTA. This includes investment in public transport, walking and cycling and the construction and operation of state highways.

NZTA must give effect to the strategic priorities set by the *Government Policy Statement on Land Transport 2024-2034* (GPS). These strategic priorities are considered relevant to this Plan Change process:

- Economic growth and productivity
- Safety

This strategic context forms the basis of the position of NZTA regarding this proposed private plan change.

4. State highway environment and context:

State Highway 8 (SH8) is immediately south of the proposed plan change area, with the intersection of SH8 and Springvale Road located at the southern point of the plan change area.

SH8 provides a connection for the Mackenzie Basin and Central Otago areas to the coastal towns of Timaru and Dunedin and State Highway 1. On a more local level, it provides a vital link between the towns of Cromwell and Alexandra.



In this location, SH8 is an arterial road under the One Network Road framework. It has a posted speed limit of 100 km/h and an average daily traffic volume of 6,327 vehicles, 7% of which are heavy vehicles. The state highway in this location is a limited access road (Hartley Road to Muttontown Road) that was gazetted as such in 1984.

The SH8/Springvale Road intersection is currently a priority controlled (give-way) T-intersection with good sight distances in both directions exceeding the minimum requirements detailed in the NZTA *Policy Planning Manual*. The intersection has flag lighting.

Approximately 90 metres to the north, the intersection of SH8 with Hazlett Street is currently a 'stop' controlled T-intersection.

At the Springvale Road intersection, a right turn bay caters for vehicles approaching from Alexandra. There is no auxiliary left turning lane for the Springvale Road for vehicles approaching the intersection from Cromwell, but there is an approximately three-metre-wide and over 100-metre-long shoulder marked with diagonal shoulder markings. The shoulder is used as an informal left turn lane by vehicles approaching from Cromwell and Clyde township.

There is no specific infrastructure for pedestrians or cyclists along the state highway between Hazlett Street and Springvale Road. However, both Hazlett Street and Springvale Road appear to be a notable route for road cyclists, with a short section of SH8 connecting the two routes. The Central Otago Rail Trail commences/terminates within the area immediately south of the SH8/Springvale Road intersection, opposite of the proposed access to the private plan change area. An underpass beneath the highway, located approximately 50 metres to the south of the SH8/Springvale Road intersection provides a safe crossing location for pedestrians and cyclists to the Clyde township.

There have been multiple crashes at SH8 and local road intersections in the Clyde area over the last 10 years, though all crashes within the Clyde township area were minor. Two serious and two fatal crashes have occurred along SH8 to the north-west and south-east of Clyde in rural areas.

5. The specific provisions of the proposal that this submission relates to are:

Provisions relating to the state highway network, as outlined in the attached Table 1, to the extent that they impact NZTA's obligations in terms of ensuring an effective, efficient and safe land transport system in the public interest. NZTA seeks to ensure that appropriate transport infrastructure is provided at the right time to support the plan change and anticipated future growth.

6. The submission of NZTA is:

NZTA is overall neutral on PC23 to the extent outlined in this submission and in terms of the proposal overall. However, NZTA currently opposes some of the wording of the proposed provisions, as outlined in Table 1 below. NZTA also encourages the developer and Council to investigate whether the existing underpass under SH8 requires upgrading to cater for more of an urban path use rather than just a rail trail connection cycling path.

7. NZTA seeks the following decision from the local authority:

Decisions that NZTA seeks on PC23 are set out in the attached Table 1.

Any other relief that would provide for the adequate consideration of potential effects on the operation of the state highway environment and the safety of its users.

8. NZTA does wish to be heard in support of this submission.

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



10. NZTA has appreciated the early engagement of Hartley Road Partnership and is willing to work with them in advance of a hearing.

Signature:

A handwritten signature in black ink, appearing to read 'N. Reuther', is written over a light blue horizontal line.

Nick Reuther

Senior Planner – Poutiaki Taiao / Environmental Planning

Te Toki Tārai – Transport Services, Systems Design

Pursuant to an authority delegated by NZ Transport Agency Waka Kotahi

Date: 10 January 2025

Address for service: NZ Transport Agency Waka Kotahi

Contact Person: Nick Reuther

Phone: (03) 741 8553

Email: EnvironmentalPlanning@nzta.govt.nz & Nick.Reuther@nzta.govt.nz



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Auckland CBD 1010
New Zealand
www.nzta.govt.nz

Table 1: NZTA Submission on Central Otago District Plan PC23 – Hartley Road Partnership

Sub #	Provision Number	Position	Reason for Submission	Relief Sought
				<p><i>Italics</i> = PC23 notified text <u>Underline</u> = proposed additions Strikethrough = proposed deletions</p>
1	Rule 9.3.6 (iv)	Oppose in part	<p>NZTA generally supports the new Standard (d) under Rule 9.3.6 (iv) requiring a landscaping buffer along the SH8 road boundary of the site. The retention and future maintenance requirements are also supported.</p> <p>However, given the location of SH8 is to the south-east of the proposed landscaped buffer strip and in an area where ice can form on the road in winter, NZTA requests changes to the standard to bring it in line with the requirements under Standard (iv)(c), to ensure any plants planted within the landscaped buffer strip do not shade the state highway between the hours of 10:00am and 14:00pm on the shortest day of the year.</p> <p>NZTA also requests that the landscaped buffer strip be kept clear of industrial activities and a corresponding change to the proposed standard is sought. This is to ensure adequate separation of industrial activities from the state highway.</p>	<p><i>(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.</i></p> <p><u>The landscaped buffer strip must not be paved or have any structures erected on it.</u></p> <p><u>Any vegetation planted within the landscaped buffer strip must not shade State Highway 8 between the hours of 10:00am and 14:00pm on the shortest day of the year.</u></p>
2	Rule 12.7.1 (iii) (h)	Support in part	<p>NZTA supports the provision for access for developments within the subdivision and the subdivision itself via a local road (Springvale Road) rather than from the state highway. Provision of safe and efficient access points to the roading network is in line with Objective 12.3.1 and Policy 12.4.1 of the district plan.</p> <p>The provisions requiring resource consent for a non-complying activity for any direct access to SH8 from any development of, or subdivision within, the plan change site are supported.</p>	<p>Amend the provision as follows:</p> <p><i>There shall be no <u>vehicle or other</u> 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></p>

[New Zealand Government](#)



Sub #	Provision Number	Position	Reason for Submission	Relief Sought <i>Italics</i> = PC23 notified text <u>Bold Underline</u> = proposed additions Bold Strikethrough = proposed deletions
			<p>However, NZTA considers that the 'no access from the state highway' requirement should also include pedestrian access to those sections adjoining the state highway, as accessibility to the back of these sections might create a safety risk for pedestrians trying to cross the state highway near the area of Hazlett Street. Corresponding relief is sought.</p>	
3	Rule 12.7.1 (iii) (i)	Oppose	<p>The Integrated Transport Assessment (ITA) prepared for the proposed rezoning identified an existing shortfall in the intersection geometry because there is no left-turn lane from SH8 to Springvale Road, although one is already required under current traffic volumes.</p> <p>The plan change request (Section 1.2) and the AEE (Section 4.0) state that it is proposed to provide a suitable left turning lane from State Highway 8 into Springvale Road prior to any subdivision occurring within the plan change area. NZTA supports this requirement.</p> <p>However, the proposed provisions currently do not include this requirement but refer to a painted median which is already in place.</p> <p>Further, as noted in the cover letter, the short stretch of state highway between the Hazlett Road and Springvale Road intersections appears to be used frequently by road cyclists. To ensure the safe functioning of SH8 in this location, NZTA considers that the proposed left turn lane design needs to consider cyclists in this location and recommends having a wider road shoulder along the left turn lane that extends around the corner leading into Springvale Road.</p> <p>Corresponding relief is sought to Rule 12.7.1 (iii)</p>	<p><i>(i) Prior to subdivision and industrial development occurring on Lot 1 DP 600773 the State Highway 8 / Springvale Road intersection shall be <u>upgraded</u> improved by providing:</i></p> <ol style="list-style-type: none"> <u>1. An auxiliary left turn lane for traffic turning left off State Highway 8, with the details of the design being in general accordance with Austroads Guide to Road Design Part 4A: Unsignalised and Signalised Intersections; and</u> <u>2. A wide shoulder adjacent to the auxiliary left turn lane under (i), extending into Springvale Road to provide safe left turning for cyclist.</u> <u>3. 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).</u> <p><u>Advice Note: The final design of the intersection will be approved as part of the Corridor Access Request required from the New Zealand Transport Agency under the</u></p>



Sub #	Provision Number	Position	Reason for Submission	Relief Sought
				<p><i>Italics</i> = PC23 notified text Underline = proposed additions Strikethrough = proposed deletions</p> <p><u>Government Roading Powers Act 1989 for works in the state highway.</u></p>
4	Rule 12.7.1 (ix)	Support	NZTA supports the non-complying activity status should a development within the plan change area seek direct access to the state highway, or if subdivision or development was to occur without the necessary intersection upgrades having been completed.	Retain as notified.
5	Planning maps	Neutral	NZTA remains neutral on the proposed changes to the planning maps at this stage.	N/A
6	New provision	N/A	<p>The ITA states that <i>“in respect of employee travel, approximately 35% of the residential areas of Clyde are within a viable walking distance of the site with all of Clyde being within a 3km distance. The site is therefore well-located for these modes of travel.”</i></p> <p>Notwithstanding the above comment on cycling access via the Springvale Road intersection, no provision has been made for save crossing of SH8. While there appears to be a reliance on the existing underpass to cater for pedestrian access to the site from Clyde, this is not further addressed in the ITA.</p> <p>With increasing development on the east side of the state highway as a result of this rezoning request, the function of the underpass and connecting paths changes from a trail connection to more of an urban path. On that basis, both Council and the developer are encouraged to investigate whether the underpass requires upgrading such as sealing the path and installing lighting.</p>	<p>Relief is sought that the developer and Council:</p> <ul style="list-style-type: none"> - Investigate whether the underpass requires upgrading (e.g., as sealing the path and installing lighting) prior to any subdivision and industrial development within the site. - Consider sign-posting the underpass as pedestrian and cycling access to the new industrial land, prior to any subdivision and industrial development within the site.



Sub #	Provision Number	Position	Reason for Submission	Relief Sought <i>Italics</i> = PC23 notified text Underline = proposed additions Strikethrough = proposed deletions
			Further, it is not clear if this route (via the underpass) is sign-posted. If this is not the case consideration should be given to this.	



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NZ Transport Agency Waka Kotahi Reference: 2024-0210

10 January 2025

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

Via email: districtplan@codc.govt.nz

Tēnā koutou

Submission on proposed Plan Change 23 – Hartley Road Partnership

Attached is the NZ Transport Agency Waka Kotahi (NZTA) submission on the proposed private Plan Change 23 – Hartley Road Partnership (Clyde Industrial) to the Central Otago District Plan.

We welcome the opportunity to discuss the contents of our submission with Council officers as required.

If you have any questions, please contact me.

Nāku noa, nā / Yours sincerely

A handwritten signature in black ink, appearing to read 'N. Reuther'.

Nick Reuther
Senior Planner – Poutiaki Taiao / Environmental Planning
Te Toki Tārai – Transport Services, Systems Design
NZ Transport Agency Waka Kotahi
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[New Zealand Government](http://www.newzealand.govt.nz)

006

Resource Management Act 1991

Submission on Notified Proposed Plan Change to

Central Otago District Plan

Clause 6 of Schedule 1, Resource Management Act 1991



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



Info@codc.govt.nz
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(FORM 5)

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



DETAILS OF SUBMITTER

Name of Submitter: PETER GILMORE YOUNG

Postal Address: 50 SPRINGBULE ROAD, IRD ALEXANDRA 9391
(Or alternative method of service under [section 352](#) of the Act)

Telephone: 0374 445 927

Email: p.young.fas@stra.co.nz

Contact Person: PETER YOUNG
(Name & designation, if applicable)

This is a submission on proposed Plan Change 23 to the Central Otago District Plan (the proposal).

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

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

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

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

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

(Give details, attach on separate page if necessary)

REZONING THE LAND FROM RURAL RESOURCE AREA TO INDUSTRIAL RESOURCE AREA.



OFFICIAL REGIONAL IDENTITY PARTNER

www.centralotagoz.com



This submission is:

(Attach on separate page if necessary) Include:

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

I OPPOSE THE PROPOSAL TO REZONE THE LAND FROM RURAL RESOURCE TO INDUSTRIAL RESOURCE DUE TO THE IMPORTANCE OF RETAINING THE UNIQUE CHARACTER OF CLYDE TOWNSHIP, THE IMMINENT EXPANSION OF THE RESIDENTIAL AREA AND THE AVAILABILITY

(SEE ATTACHED)

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

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

THAT THE APPLICATION BE DENIED IN ITS ENTIRETY.

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

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

Signature 

Date 13/01/2025

Submissions close in response to proposed Plan Change 23 at 4pm on Friday 17th January 2025

Note to person making submission

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

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

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



- AVAILABILITY OF UNUTILISED INDUSTRIAL LAND ONLY 8 KM AWAY IN ALEXANDRA.

007

Resource Management Act 1991

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1 Dunorling Street
PO Box 122, Alexandra 9340
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(FORM 5)

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



DETAILS OF SUBMITTER

Name of Submitter: GREG RABBITI / HELEN AXBY

Postal Address: 115 SPRINGVALE ROAD
(Or alternative method of service under section 352 of the Act)

Telephone: 027 535 1657

Email: helenaxby@hotmail.com

Contact Person: HELEN AXBY
(Name & designation, if applicable)

This is a submission on proposed Plan Change 23 to the Central Otago District Plan (the proposal).

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

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

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

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

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

(Give details, attach on separate page if necessary)

Pls. SEE ATTACHED



**This submission is:**

(Attach on separate page if necessary) Include:

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

PLEASE SEE ATTACHED

OPPOSE ALL PARTS OF THE APPLICATION

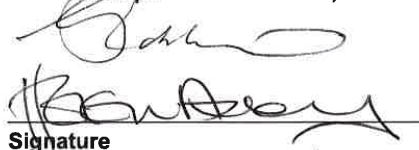
I/We seek the following decision from the consent authority:

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

REFUSAL OF PLAN CHANGE

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

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


Signature

16/01/2025
Date

Submissions close in response to proposed Plan Change 23 at 4pm on Friday 17th January 2025

Note to person making submission

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

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

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- it contains offensive language;
- it is supported only by material that purports to be independent expert evidence but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

**115, Springvale Road
RD1
Alexandra 9391**

The Chief Executive
CODC
PO Box 122
Alexandra 9340

Dear Sir

Re: Submission – Plan Change 23, Hartley Road Partnership, Springvale Road

We have reviewed the available documentation regarding this proposal and that changing from Rural Resource to Industrial Resource zoning is a step too far at the junction of Springvale Road and State Highway 8. This is an unnecessary, high-density development which will have significant impact on traffic volumes and create greater risk at a busy junction. It is an inappropriate use of land in this location and compounds scattergun development of light industrial land availability across the region.

Our concerns are:

- Safety at this (already very busy) junction which has been recognised by CODC for many years and was the major reason for construction of the underpass for foot/cycle traffic.
- Increase in traffic using Springvale Road to access Dunstan Road to access Russel/Ngapara Streets including growth in traffic to and from Fulton Hogan. As traffic volumes continue to increase, there is the potential for volumes to grow close to those currently on the highway.
- Intentions for access are potentially unsafe – an entrance/exit to the industrial area off Springvale Road. This adds risk for those turning into Springvale Road as vehicles (potentially large vehicles) exit the industrial area.
- The area is already absorbing an increase in traffic using Springvale Road and Young Land to access Monte Christo including the new winery access.
- Additional traffic volumes result from horticulture developments in Waikerikeri Valley including staff movements, produce leaving site, deliveries etc. This is on top of growth in the area of McArthur Ridge and Golden Road – viticulture and residential.
- The Quarry at the end of Springvale Road creates still more truck traffic and dust.
- Residential development in North Alexandra (off Manuherikia Road) also has the capacity to increase traffic in Springvale Road/Dunstan Road/Letts Gully as people commute avoiding passing through the town.

- There is ample industrial resource area available in both the Russell/Ngapara Street area and Boundary Road area with no real/proven demand for such facilities on the boundary of Clyde township.
- 21 Sections are proposed with no evidence of the required 10m landscaped buffer zone required shown on the current plan. This is intensive development not consistent with other claims made in the application.
- This plan is based on a reduction in traffic as people will no longer need to commute to Alexandra for work and as a benefit to current and future residents of Clyde (reduced travel times, access to services etc.) all of which are speculative at best. These speculations show zero benefit to residents of Springvale Road and minimal benefit at best to Clyde residents.
- If CODC has any standards to regulate a Rural Industrial Zone there are not easily accessible. Other DC's do have standards as a matter of public record. These should be made available as part of the consultation process in order that those being consulted can understand the true impact of such a Plan change.
- Overall, we believe that this is an unnecessary development and are unclear about how demand for such a facility has been assessed. Much of the Assessment of Environmental Effects appears to be blue sky thinking without any real foundation – 'build it and they will come'.
- The land opposite this Block has historical reasons for industrial use – as the Clyde railhead and currently home to the Otago Central Rail trail and Coast Guard/Fire Service. All the ongoing beautification work that has taken place around that area has been completely ignored in the proposals for this plan change. This is not comparable with the intensive development proposed.
- And finally, this proposed development would be an eyesore at the main entrance to Clyde Township. There has been no substantive argument put forward to justify a change from Rural Resource Zoning to Rural Industrial Zoning.

Yours faithfully



Greg Rabbitt



Helen Axby