

If calling ask for Liam Wang
File Ref: RMA20250158#0020

16 June 2025

Hamachek Holdings Limited
c/- Craig Batchelar, Cogito Consulting Limited (Agent)
5A Wells Avenue
Mount Maunganui 3116

Sent via email: craig@cogitoconsulting.co.nz

Dear Sir

Application for Resource Consent: 160 Evenden Road, Twyford, RMA20250158

An initial assessment of your application for resource consent has been completed.

Council received the above resource consent application from Hamachek Holdings Limited (Hamachek Holdings) on 16 May 2023. The application is for a non-complying development to establish a multi-fuel energy centre to service HGVs and other vehicles, as well as consent under the NESCS, on the corner of Evenden Road and the Hawke's Bay Expressway (SH 2), Twyford, within the Plains Production Zone.

The proposal includes large truck stop facilities, stock effluent discharge facilities, supporting café and convenience retail facilities, and a fruit shop facility in a market-style setting, dedicated parking for trucks, long vehicles and cars, extensive stormwater detention basin, along with the necessary enabling works (earthworks) and landscaping.

Under Section 92 of the Resource Management Act (RMA) 1991, the Hastings District Council requires further information to fully assess your proposal, its effect on the environment, and the ways in which any adverse effects on the environment might be mitigated, as follows:

1. Transportation Assessment Report

Hastings District Council's Transportation Engineers have reviewed the application, including the Transportation Assessment Report (TAR) prepared by Stantec, and have provided initial comment. They have identified that the following matters require further consideration to assist with a full understanding of the proposal, and to assist with the assessment of the transportation effects of the proposal on the environment:

- a. Traffic Volumes/Movements – In the 'Introduction' to the TAR, it states 'this assessment has been based on historical traffic volume and travel pattern data from 2019. These remain appropriate as traffic conditions remain unsettled following the roading impacts of Cyclone Gabrielle' (pg 1). Council Transportation Engineers identify that traffic movements have changed markedly across the network since Cyclone Gabrielle but that traffic conditions are no longer unsettled, and that the TAR should reflect more recent traffic volume and travel pattern data.
- b. Consultation with NZ Transport Agency (NZTA) – There is little reference in the application to the specific views of NZTA and any response to those views. As well as obvious safety and efficiency matters, Council's Transportation Engineers consider it important that NZTA also confirms whether the existing designation boundaries are sufficient for the expressway upgrading (four-laning) now anticipated. The TAR (and AEE) should be updated to reflect the views of NZTA and any response to those views. Note: The level of detail in the record of consultation accompanying the application is addressed more broadly, later in this letter.

- c. Entrance Location on Evenden Road – According to the TAR, the proposed entrance is located 75m from the roundabout, largely to maintain separation from the Delegats winery entrance. This results in a proposal to close part of the outside circulating lane in the roundabout, to increase stacking length in the flush median on Evenden Road. Council’s Transportation Engineers consider this should not be necessary if the access is located far enough from the roundabout.

The Delegats winery entrance appears little used – it has been closed off with security fencing since at least the middle of 2022 (as can be seen on Google Street View). Council’s Transportation Engineers note that opposing crossings are not rare and, unlike with crossroad intersections, crossing movements are uncommon. They note that this may be the lesser of two evils, but that it has not been analysed as a potential option in the TAR. Please provide an analysis of this option.

Council’s Transportation Engineers also note that the stacking of inbound vehicles in the flush median also conflicts with the stated need for trucks turning left out of the site to use it to avoid entering the opposing traffic lane. They consider proper design of the vehicle crossing will avoid this problem.

- d. Expressway/Evenden Road Roundabout – The most significant matter for Council’s Transportation Engineers is the recommendation to change the circulating arrangement on the roundabout and westbound departure on to Evenden Road without any adequate modelling of the roundabout taking into account more recent traffic volumes.

In addition, there has been no safety assessment as to the potential of the change in lane arrangements proposed on the Evenden Road east approach. Based on what has been provided in Section 6.5 of the TAR, it is clear that the current lane arrangement is well set up to cater for the movements from that approach such that the lane movement volumes are close to being balanced.

Given the proposed lane configuration change recommended in the TAR, please provide a safety assessment to support the case that safety would not be impacted.

- e. Please provide an updated Transportation Assessment Report addressing the above matters.

Please note: It is usual for Hastings District Council to have the Transportation Assessment Report for a project of this magnitude peer reviewed as a matter of course. It is likely that Council will commission a peer review of this assessment following receipt of the above further information.

2. Engineering/Serviceing

To assist with a full understanding of the proposal, and to assist with the assessment of the proposal in terms of design and operation of servicing infrastructure and its effects on the environment, including on public infrastructure and receiving environments:

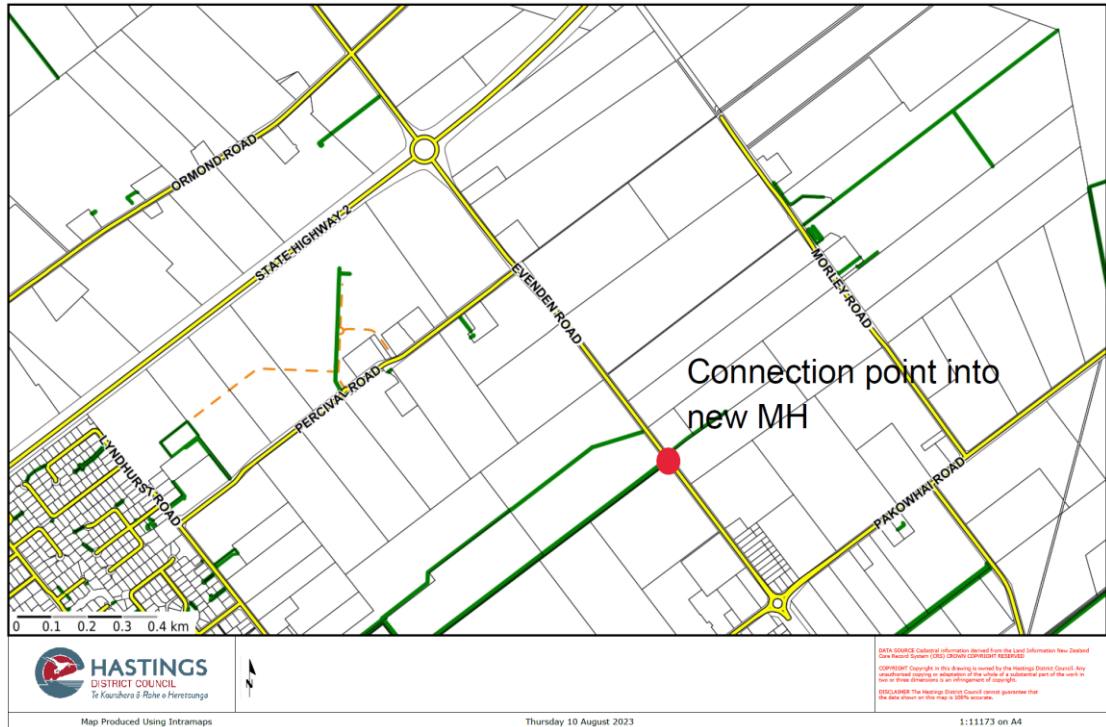
- a. Wastewater— Hastings District Council’s 3 Waters Engineers have reviewed the application, including the Infrastructure Report prepared by Infir, and provided initial comment. They note that the applicant’s engineering consultant has been previously advised that the proposed discharge point does not have the capacity and that the closest point would be further downstream. Therefore, the current proposal is not accepted. To this end, reference is made to previous email communications between Council’s 3 Waters Growth & Development Manager (Kelly Nikora) and the applicant’s consultants (Infir) from 8 August 2023, which advised that:

‘The original intent and design of the 100mm rising main that services the Mitre 10 Sports Park does not match what we now have onsite today (60 bed hostel and large aquatic centre and the largest sporting facility in nz). In addition to this, the venue in total attracts 320k people per year, and in the past 5 or so years those using the facility have doubled, and although peak

demands will vary depending on the event calendar, it paints the picture of why we prefer not to connect into this line.

There is a new option for a connection point into what will be the new domestic trunk main delivered as part of our greater IAF works of which the alignment has now been confirmed as per the attached.

There will be no capacity issues with this option, and it will be delivered in the next two years. It is domestic, however we can work through the detail of what will be required to discharge trade waste, noting it will likely incur the normal trade waste discharge levies, but in principle this option works.'



Council's 3 Waters Engineers advise however, that with the recent wastewater upgrades, there could also be an option to discharge to the new trunk on SH2, subject to construction timing.

It is recommended that the applicant discuss wastewater options with Council's 3 Waters team to determine an acceptable solution. Following determining an acceptable solution, please provide an updated Infrastructure Report (and AEE), accordingly.

- b. Please provide confirmation from power and telecommunications service providers that such services to the site are available.

3. Consultation Information

Section 13.0 of the AEE accompanying the application refers to consultation with identified key stakeholders for the purpose of informing the parties about the proposal, obtaining their views, and incorporating responses into project planning where possible, and that this consisted of a series of meetings, hui, and written communications (pgs 76/77). Key themes raised by stakeholders are summarised, and a Consultation Summary is supplied in Appendix 10 to the AEE, which tabulates the organisations approached, broad dates of consultation, and a very brief outline of the 'issues addressed'.

The record of consultation does not adequately identify the persons affected by the activity; provide sufficient information of the consultation undertaken in terms of when, how and with whom; or clearly relate what the views were in each case, and any response to those views.

To better assist with assessment of potential adverse effects on affected persons/parties:

- a. Please provide a more detailed record of the consultation undertaken, that fully addresses the matters in clause 6(1)(f) of Schedule 4 to the RMA, including:
 - i. Identification of the persons considered affected by the activity;
 - ii. Any consultation undertaken; and
 - iii. Any response to the views of any person consulted.

In particular, please provide a comprehensive record of the consultation the applicant has had with:

- *NZ Transport Agency Waka Kotahi* – especially given the proximity to SH 2 and the Evenden Road/Expressway roundabout, and intention to reconfigure the roundabout; the partial encroachment of NZTA’s SH 2 designation onto the site; the related encumbrances applying to the site; the redirection of roadside drainage purportedly required; the extent of the existing designation boundaries to cater for the anticipated four-laning of the Expressway in the near future; and given the obvious intent of the proposal to attract and draw custom from state highway users; and
 - *Delegats Winery* – especially given the proximity of the proposal to the winery, and proximity of the proposed site access on Evenden Road to their existing winery access; and reference in the application to an alternative wastewater solution connecting to Delegats existing private sewer rising main.
- b. Specifically in relation to the proposed stock effluent disposal facility component of the proposal, Section 3.11 of the AEE accompanying the application states that ‘The proposal is supported by the road transport industry and other interests including Regional Council and New Zealand Transport Agency (NZTA)’:
 - i. Please provide evidence of this support.
 - ii. Please also provide a copy of the ‘national plan’ of Stock Effluent Disposal Sites referenced in this same section of the AEE, showing the application site in the ‘recommended programme’.

4. Assessment of Objectives and Policies

Section 10.7 of the AEE accompanying the application provides an assessment against the various outcomes, objectives and policies of the Hastings District Plan. This considers the following sections of the District Plan:

- Section 2.4 Urban Strategy
- Section 2.5 Transportation Strategy
- Section 2.8 Rural Resource Strategy
- Section 3.1 Tangata Whenua and Mana Whenua
- Section 29.1 Hazardous Substances

To assist with a complete assessment of the proposal under section 104(1)(b)(vi) and section 104D(1)(b) of the RMA:

- a. Please also provide an assessment against the outcomes, objectives and policies contained in the following sections of the District Plan:
 - i. Section 6.1 Plains Strategic Management Area;
 - ii. Section 6.2 Plains Production Zone;
 - iii. Section 15.1 Natural Hazards;
 - iv. Section 25.1 Noise;
 - v. Section 26.1 Transport & Parking; and
 - vi. Section 27.1 Earthworks, Mineral Aggregate and Hydrocarbon Extraction.

5. Signage

Given the encumbrance on the title of Pt Lot 2 DP 7912 in favour of NZTA which includes protection of the highway from signage which may distract transport corridor users (clause 3.3), it is considered that further information is required to be able to meaningfully assess the effects of the proposed signage on the surrounding environment.

In the Proposal Drawings contained in Appendix 3 to the AEE, Drawing No. 3139-I-03 Rev P3 dated 13-03-25, prepared by Technitrades Architecture, identifies that the 9.0m Site Identifier Sign and 9.0 Service Station Price Sign will be backlit illuminated. It is unclear if any of the other proposed signage (logo, canopy, seasonal fruit sales, service station, and café signs) is to be illuminated (either internal or external).

- a. Please confirm if any other proposed signs are to be illuminated (internal or external).
- b. Please review compliance or otherwise with the Rules in Section 28.1 Advertising Devices and Signs in the Hastings District Plan.

6. Lighting

Given the encumbrance on the title of Pt Lot 2 DP 7912 in favour of NZTA which includes protection of the highway from lighting which may dazzle or distract drivers (clause 3.2), and given the 24/7 nature of the operation of this facility, it is considered that further information is required to be able to meaningfully determine the degree of potential light spill or glare and its implications for the surrounding environment.

To assist with an assessment of light spill and glare on the surrounding environment:

- a. Please provide a concept lighting design of the facility, prepared by a suitably qualified lighting expert, including proposals for illumination of parking areas and truck stop, internal driveways, service station forecourt, buildings, and illuminated signage.
- b. Based on the above concept lighting design, please provide an assessment of light spill and glare effects on the surrounding properties and environment, and for drivers on the state highway and Evenden Road.

7. Staffing Levels

The Transportation Assessment Report attached as Appendix 4 to the AEE outlines that 'The proposed service station shop and café will employ less than 15 FTE staff' (Table 1, pg 18). There does not appear to be any outline of likely staffing requirements anywhere within the application documentation.

To assist with a full understanding of the proposal, and to assist with the assessment of potential traffic generation and parking effects of the proposal:

- a. Please provide an outline of anticipated staffing levels for the proposed service station shop, café, and fruit shop facilities.

8. Hours of Operation

The Landscape Effects Assessment attached as Appendix 5 to the AEE mentions that 'The service station and truck stop are anticipated to operate continuously every day. The other retail stores and café are anticipated to operate between 6.00am and 10.00pm or thereabouts' (pg 5). Section 7.9.3 of the AEE merely states 'The facility will operate 24/7 for fuel and truck services, while the café and shops will have daytime and evening hours' (pg 44).

To assist with a full understanding of the proposal, and to assist with the assessment of potential adverse effects on the environment:

- a. Please confirm proposed hours of operation for the café and fruit shop facilities.

9. Landscape Plans & Visualisations

The Landscape Plans accompanying the Landscape Effects Assessment are identified as 'For Review'. Similarly, the Graphic Attachment (Viewpoints and Visualisations), attached as Appendix A to the Landscape Effects Assessment are identified as 'Draft for Discussion'.

To assist with a settled understanding of the applicant's proposal, in terms of assessing its potential landscape and visual effects:

- a. Please supply final versions of these plans.

In accordance with section 92A of the Act you must within 15 working days of the date of this request, take one of the following options:

1. Provide the information; or
2. Inform the Council in a written notice that you agree to provide the information; or specify a reasonable timeframe for providing the information for agreement of Council, or;
3. Inform the Council in a written notice that you refuse to provide the information.

Section 95C(2) of the Resource Management Act requires Council to publicly notify your application if:

- i) the information is not received within either 15 days; or
- ii) the information is not received within any agreed timeframe; or
- iii) if you decline to provide the information.

However, it is noted that the applicant has specifically requested that the application be publicly notified, in any case.

Public notification of your application has been placed on hold awaiting your response to this request, in accordance with section 88B of the Act. Where possible however, the application will continue to be processed as allowed by the information already supplied.

Please contact me if you have any questions regarding the above information request or the further processing of the application.

Yours sincerely



Rowena Macdonald
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Authorised by:



Liam Wang
Team Leader Environmental Consents / Subdivision