

28 October 2020

Palmerston North City Council

Attention: Ryan O'Leary

By email: roleary@propertygroup.co.nz

**Further information request by letter dated 27 October 2020 - (RC LU 5331)**

1. Thank you for your letter, dated 27 October 2020. We do not agree with most of the content of the message.
2. The further information you requested was supplied. The meetings you describe provided even details concerning why the Church formed the view there were no appropriate practical options that met their requirements as a Congregation. Also, the application in the table in section 1 sets out the aspects of the objectives of the Congregation requiring the solution proposed. The application met all the requirements for notification. We do not accept your request is at a reasonable time before the hearing under RMA, s 92. This has come belatedly and after a commitment by you to get the hearing sorted.
3. The Congregation accepts that Policy 1.4 needs to be addressed but isolating it as you have and treating it as some sort of gateway requirement (picking up on Ms Stevens' notification analysis) is an incorrect reading of the Plan and inappropriate. Furthermore, what you consider is a correct assessment of alternative options is entirely misguided. That can be illustrated by your reference to the Victoria University assessment. That assessment is inadequate to guide the evaluation of this application for the following reasons:
  - (a) There is a different District Plan policy suite;
  - (b) The Palmerston North District Plan refers to social, cultural and environmental costs and benefits. These are intrinsically related to matters of liturgical and missional values as much as heritage values;

- (c) You imply the relative cost of alternatives is essential when it is only one factor and missed the reality alternatives cannot be compelled..
  - (d) The planning framework in the Palmerston North District Plan shows a preferential option for the continued use of the building as a church which re-emphasises the importance of those Christian aspects of social and cultural welfare as crucial dimensions of the cost-benefit assessment.
4. We agree with your assessment that the decision-maker would benefit from detailed evidence to address Policy 1.4. We found the Victoria University assessment simplistic. While the planning evidence for the Applicant will address the costs and benefits in addressing Policy 1.4, it will be done within a matrix of evidence that needs to be cross-referenced to that assessment. To fully answer your question it would require the Council to divulge its entire evidence. If that is your objective, then it is inappropriate; however the Congregation had planned to release its evidence early had the hearing been arranged in a timely fashion.
  5. We suggest, given your letter that you are struggling to make an appropriate social, cultural, economic and environmental costs and benefit analysis. In those circumstances perhaps the way forward is for your report to identify the key issues without making any firm recommendations and you can note that you will reserve making a recommendation until all the evidence is available.
  6. All Saints is committed to assisting the Panel to achieve its task including consideration of all relevant policies.
  7. If the hearing is not scheduled in accordance with the Act then enforcement proceedings will be taken. The ongoing delay has already unacceptably increased the cost of this project on a community that can ill afford it.
  8. The Applicant will now need to be involved in the selection of a hearing date because it will now be on short notice and the Congregation needs to make sure that its experts are available.

Yours sincerely,

Matt Soong

021 377 474  
Lakemba Properties NZ Ltd  
PO Box 55  
Palmerston North 4410