

**BEFORE THE INDEPENDENT HEARINGS PANEL
OF HAMILTON CITY COUNCIL**

UNDER the Resource Management Act 1991 ("**RMA**")

AND

IN THE MATTER of Private Plan Change 17 to the Hamilton City
Operative District Plan ("**PC17**")

**STATEMENT OF EXPERT EVIDENCE OF SAMUEL JAMES COLES
ON BEHALF OF FONTERRA LIMITED**

URBAN DESIGN

7 OCTOBER 2025

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1. EXECUTIVE SUMMARY

- 1.1 This evidence, on behalf of Fonterra Limited ("**Fonterra**") addresses the urban design aspects of the PC17 proposal to rezone 91 hectares of land surrounding the Te Rapa Dairy Manufacturing site ("**Manufacturing Site**") as Te Rapa North ("**Plan Change Area**") from Deferred Industrial Zone ("**DIZ**") to Te Rapa North Industrial Zone ("**TRNIZ**").
- 1.2 The Plan Change Area is framed by existing and planned development and major transport corridors, with notable features including the Waikato River and Te Rapa Stream.
- 1.3 There is a strong alignment between the urban design “key moves” that informed the Structure Plan, the Master Plan designs, and the urban design outcomes that are enabled by PC17, which I assess overall as very positive. These include protecting the Manufacturing Site, preserving the Waikato River and Te Rapa Stream, providing for a focal amenity hub, integrating transport connections, and supporting rail access.
- 1.4 The Structure Plan establishes a clear transport hierarchy, efficient block layout, and appropriate edge treatments. Planning provisions support building heights and setbacks consistent with industrial use, enhanced landscaping, and the provision of worker amenities. Flexibility is provided for future development activities, with further urban design considerations able to be addressed at the resource consent stage.
- 1.5 The proposal aligns with the urban design aspects of the National Policy Statement on Urban Development ("**NPS UD**"), the Future Proof Strategy, and the Hamilton City Operative District Plan ("**ODP**").
- 1.6 I reviewed the submissions lodged on PC17 and the amendments to the PC17 documents made following notification. These have not impacted on the findings of my earlier assessment nor the fundamental urban design aspects of PC17.
- 1.7 No new concerns or issues are identified in the Hamilton City Council ("**Council**") Officer’s Section 42A Report ("**Section 42A Report**") in relation to urban design.
- 1.8 In my view, PC17 reflects sound urban design practice, enabling the delivery of a well-functioning industrial environment. The proposal leverages the site’s

strategic advantages, protects key natural and cultural features, and provides for the wellbeing of future workers. I support PC17 as an appropriate and effective response to the site's context and the city's industrial growth needs.

2. INTRODUCTION

Qualifications and Experience

- 2.1 My full name is Samuel James Coles. I am the Technical Director of Urban Design at Harrison Grierson Consultants Limited ("**Harrison Grierson**"). I hold a Bachelor of Planning (2003) and a Master of Urban Design (2005), both from the University of Auckland.
- 2.2 Most of my 20-year urban design career has been focused on the preparation of structure plans, master plans and detailed concept designs for large-scale developments.
- 2.3 I have appeared as an expert at hearings on multiple occasions, most recently including:
 - (a) Auckland Unitary Plan Change 91 – Residential growth area (2023); and
 - (b) Waipā District Plan Change 20 – Airport Northern Precinct industrial expansion (2024).
- 2.4 I have also contributed urban design services to numerous plan changes and structure plans involving large-scale industrial growth areas. These included designs and assessments for:
 - (a) Waipā District Plan Change 14 – Mangaone Industrial expansion (2024);
 - (b) Auckland Unitary Plan Change 111 (Private) - Hobsonville Grove, Whenuapai (2025);
 - (c) Waterloo Business Park in Christchurch;
 - (d) Izone Southern Business Hub in Rolleston;
 - (e) Auckland Airport's Air Park and The Landing industrial precincts;
 - (f) Christchurch International Airport Business Park and commercial expansion; and

- (g) Kapiti Coast Airport industrial development.

Involvement in PC17

- 2.5 I led Harrison Grierson's urban design team's work. My specific role included reviewing site context assessments, contributing technical urban design inputs to the development of the Structure Plan, and the authoring of the Illustrative Master Plan in 2024.
- 2.6 I undertook a site inspection in March 2023 and have a good understanding of the Plan Change Area and its surrounding context. The urban design aspects of PC17 are described within my Urban Design Report, prepared in December 2024, submitted with the plan change request.

Code of Conduct

- 2.7 I confirm that I have read the Expert Witness Code of Conduct set out in the Environment Court's Practice Note 2023. I have complied with the Code of Conduct in preparing this evidence and I agree to comply with it while giving oral evidence before the Hearings Commissioners. Except where I state that I am relying on the evidence of another person, this written evidence is within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed in this evidence.

3. PC17

- 3.1 As described within the Planning report, the purpose of PC17 is to rezone the Plan Change Area to TRNIZ under the ODP.
- 3.2 The extent of the Plan Change Area is set out in Figure 1 below.

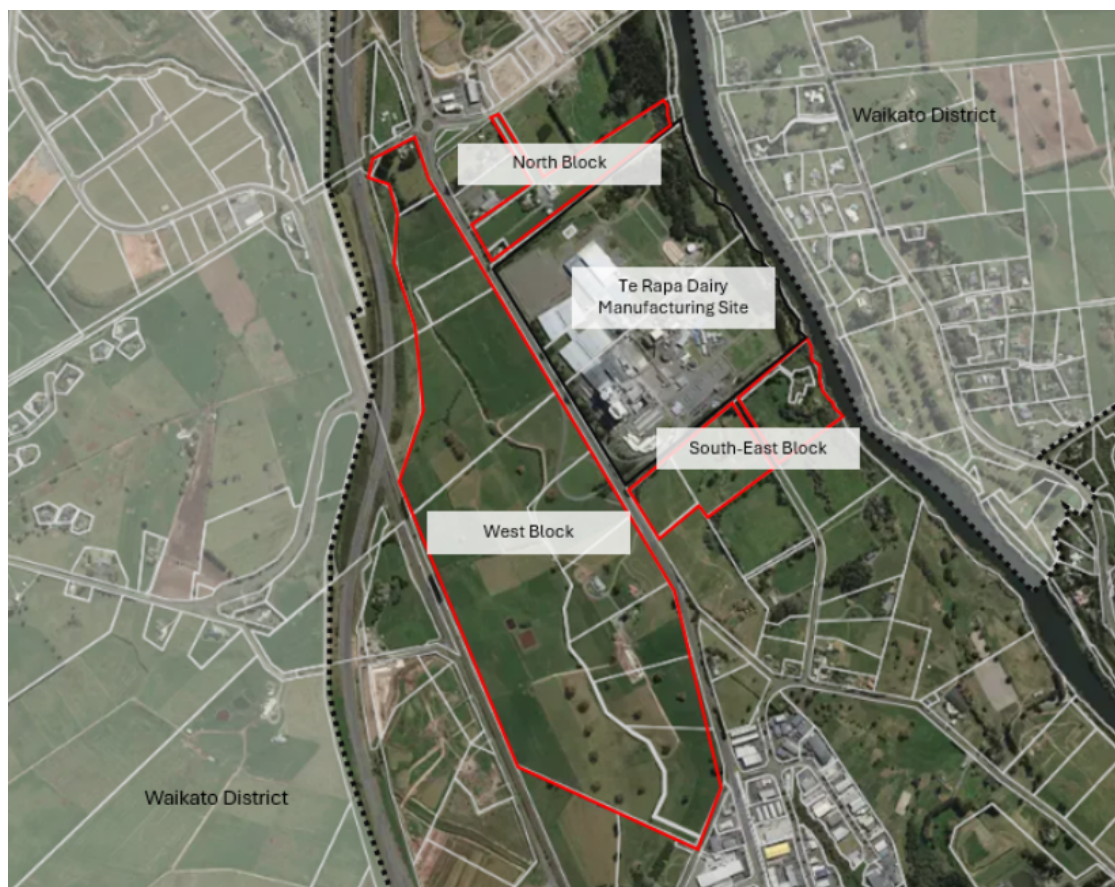


Figure 1: Plan Change Area Boundaries (Source: Harrison Grierson).

- 3.3 The DIZ is applied to a 180-hectare tract of land within the Council's jurisdiction. The DIZ adjoins the Industrial Zone land at Te Rapa to the south, is bounded by State Highway 1C ("**SH1C**") on the west, and the Waikato River on the east.
- 3.4 The deferred status of the DIZ indicates that it is anticipated by the ODP to be utilised for industrial activity in the future.
- 3.5 PC17 seeks to rezone the Plan Change Area (comprising West Block, North Block and South-East Block) from DIZ to become operative TRNIZ in the ODP. This leaves the balance of the DIZ land in its present rural use, to be rezoned through future plan changes.

4. SCOPE OF EVIDENCE

- 4.1 This statement of evidence will:
- (a) outline the existing environment and site context as a precursor to the design of the proposed Structure Plan;

- (b) summarise the Master Plan design process of the PC17 framework from an urban design perspective;
- (c) summarise the key outcomes of PC17 from an urban design perspective, including the following topics that are within my area of expertise:
 - (i) the transport hierarchy and spatial design of the roading network;
 - (ii) the central focal hub and amenities within the Plan Change Area;
 - (iii) the integration of open space within the Plan Change Area;
 - (iv) interfaces at the edges of the Plan Change Area and effects on neighbouring land; and
 - (v) activities proposed to be enabled within the Plan Change Area.
- (d) respond to urban design matters Section 42A Report;
- (e) respond to urban design matters raised in submissions; and
- (f) provide an overall conclusion on PC17 from an urban design perspective.

4.2 In preparing my evidence I have reviewed the following technical reports and rely upon their conclusions:

- (a) Planning – Request for Private Plan Change (Harrison Grierson), specifically the definition of the statutory matters of relevance;
- (b) Planning – Supplementary Information Report (Harrison Grierson), and the stated purpose of PC17;
- (c) Assessment of Landscape Effects (KLPC, Planning Landscape Consultants);
- (d) Integrated Transport Assessment (Bloxam Burnett and Olliver Ltd), including the assessment of the transport context to development and anticipated outcomes following the proposed rezoning;

- (e) Infrastructure Assessment (Harrison Grierson), specifically as it related to stormwater; and
- (f) Economic Assessment of Proposed Industrial Plan Change in Te Rapa North (Insight Economics Limited).

4.3 This evidence addresses land proposed to be rezoned under PC17 and does not fully examine, nor assess the potential development outcomes for adjacent, DIZ land.

5. EXISTING ENVIRONMENT AND SITE CONTEXT

5.1 The Plan Change Area comprises a total of 91ha of gently undulating pastoral land that surrounds the Manufacturing Site, located on Te Rapa Road. The subject land does not have any significant elevation or other landform constraints to future industrial development, nor does it comprise any sensitive or protected activities¹ or cultural features. The Manufacturing Site is a local landmark.

5.2 The Waikato River frames the eastern edge of the Plan Change Area, and its riparian margins are defined with vegetated margins, associated wetlands, and tributaries. The Te Araroa Cycle trail runs along the west bank of the Waikato River and provides connectivity benefits as well as some placemaking value. I acknowledge that the river and its margins have significant cultural value.²

5.3 The Te Rapa Stream, with its planted riparian margins, runs from south to north through the West Block Plan Change Area. Several farm tracks cross the Te Rapa Stream.

5.4 The Plan Change Area is bounded on the west partly by the North Island Main Trunk (“**NIMT**”) railway line and partly by SH1C. These corridors are a barrier to movement across them but can offer potential strategic transport linkages between the Plan Change Area, Hamilton City and the wider region.

5.5 The Northern River Crossing (“**NRC**”) is indicated on the ODP Transport corridor hierarchy plan³ and in the Long Term Plan as a crossing of the Waikato River and, if delivered, would connect the Plan Change Area with a growing residential area at Rototuna North.

¹ For example, heritage items, scheduled trees, designations.

² Described in the Cultural Advice Report Prepared for PC17 by Jo Kukutai & Carolyn Hopa

³ Volume 2, Appendix 15 Transportation, Figure 15-4b.

- 5.6 To the north of the Plan Change Area sits a small number of rural-residential properties, a Sikh Temple at 1426 Te Rapa Road, (a cultural and heritage site) and a fuel and retail service centre that is located at the entrance to the Te Awa Lakes development, under construction, that provides for 2500 residents, amenities and a commercial precinct. A small community park is also located adjacent to the retail service centre.
- 5.7 Further to the north along SH1C sits the small town of Horotiu. This area, within Waikato District, includes expanding industrial land south of the existing township.
- 5.8 To the south of the Plan Change Area sits a broad corridor of existing industrial development, focussed on Te Rapa Road and Arthur Porter Drive. Several undeveloped rural blocks sit between the Manufacturing Site and the existing Te Rapa industrial area. This context means that the Plan Change Area is mostly framed by development (existing or planned) and transport routes. Once fully developed, the area encompassing Te Rapa and Horotiu would be identifiable as a significant corridor of industrial activity alongside SH1C.

Urban Design opportunities and constraints

- 5.9 The Plan Change Area's key urban design opportunities informing the design of the Structure Plan were assessed and described in the Urban Design Report. They are summarised as follows:
- (a) The large size of the Plan Change Area enables development of a wide range of industrial activities, including very large-scale, industrial operations.
 - (b) Existing transport connectivity to SH1C via Te Rapa Road could be further enhanced through an extension to Koura Drive in the future. This would offer a southern gateway entry to the Plan Change Area.
 - (c) Strong identity and a high profile (visual catchment) for commercial activities is possible from Te Rapa Road and SH1C (which is elevated and has views across the site).
 - (d) Visual and recreational amenity along the Waikato River corridor can be enhanced in the future, including connections to future amenities at Te Awa Lakes.
 - (e) The land near Onion Road is suitable for a new siding to the NIMT.

- (f) Formal protection of the Te Rapa Stream and the banks of the Waikato River is possible. The watercourses and their margins can provide a character-defining element for the Plan Change Area.
- (g) The large size of the Plan Change Area enables a new amenity (focal) area to be included. This could comprise open space and convenience food outlets for the well-being of workers in the area, public transport and active travel links.

5.10 Key constraints to industrial development are summarised as follows:

- (a) Fonterra owns most of the Plan Change Area and is able to facilitate rezoning and development. However, other owners of land within the DIZ are not party to the Plan Change. A challenge is to enable industrial development within the Plan Change Area while not adversely impacting existing or potential future development activity on those adjacent landholdings.
- (b) Te Rapa Road provides a key route to the Plan Change Area, but upgrades including a future extension to Koura Drive / NRC need to be enabled within the Structure Plan.
- (c) The Te Rapa Stream occupies low lying land that receives runoff from a wide catchment. Significant areas of land need to be provided within the Plan Change Area for stormwater management.
- (d) Proposed development adjacent to cultural sites (Sikh temple, Mangaharakakeke Paa site, Waikato River) requires a landscape design response, eg setbacks or buffering.

6. MASTER PLAN DESIGN PROCESS

- 6.1 During the past two years our urban design team has worked alongside the project team's technical specialists to gain a thorough understanding of the Plan Change Area's potential for industrial development.
- 6.2 Several Master Plan design iterations were created to investigate potential development outcomes on the Plan Change Area. The Master Plans integrated yield capacity studies, lot and building typology studies, concept layouts, and visualisations.
- 6.3 The Master Plan's iterative and collaborative design process was underpinned by urban design "Key Moves" (described in paragraph 6.6 below). These were

developed and refined to communicate the outcomes that the urban design team considered would produce a quality urban design response within the Structure Plan and provisions.

- 6.4 The Master Plan enabled us to predict outcomes and guide the development of design-related aspects of the Structure Plan such as the proposed road cross sections and some planning provisions. The urban design team also considered some of the finer-grained urban design outcomes that might be experienced beyond the Structure Plan phase.
- 6.5 The resulting illustrative Master Plan (Figure 2 below) provides an informed (hypothetical) vision of future development potential, character and layout. It is consistent with the technical work undertaken through the design process and forms a helpful frame of reference for the project team, stakeholders, and the public.



Figure 2 – Illustrative Master Plan.

Urban Design Key Moves

- 6.6 Our assessment of the Plan Change Area and the progression of the design concepts informed the design of the illustrative Master Plan, the Structure Plan and background technical information prepared for PC17. Urban design-led inputs to the Structure Plan are described as “Key Moves”. They were workshopped with the Fonterra project team and refined over time in response to other specialists’ technical work. They are summarised as follows:

- (a) The Manufacturing Site is protected by a buffer of industrial land to ensure long-term operational efficiency and compatible adjacent land uses.
- (b) The Waikato River and its margins are preserved as natural open space (zone).
- (c) The entirety of the Te Rapa Stream corridor and all probable stormwater management areas, and ecology associated with it, is preserved as a future reserve. This enables quality, holistic design and management outcomes.
- (d) A route is identified for the East-West Road connection (Koura Drive extension to NRC). This provides for a southern gateway to the land in future (from SH1C). The route was identified through Fonterra's land based on favourable topography and transport functionality. The potential alignment further to the east was also considered.
- (e) Te Rapa Road is retained as an arterial route, supporting bus and cycle movements and a landscaped edge. Future industrial activity can be serviced by a new internal road network that enables efficient movement and quality frontages for new activities within the Plan Change Area.
- (f) The internal roads are shown where required and adopt an efficient loop system. This acknowledges potential phasing of development and further internal roads to be developed as required. The route also minimises crossings of the Te Rapa Stream, and partially adjoins the riparian reserve to enhance the Te Rapa Stream as a character-defining element within the site. Proposed road cross sections provide good urban design in the form of walking, cycling, and landscaping.
- (g) Rail Integration is supported via a proposed rail siding / spur line to encourage rail-connected industrial activity. Block sizes respond to this opportunity.
- (h) A Focal Area hub for worker amenities is located adjacent to the Te Rapa Stream, incorporating potential retail, food / beverage outlets, and recreational space.

6.7 The elements of the proposed Structure Plan, which was co-developed with and informed by the Master Plan, were refined through technical assessments

and workshops held by the project team. More recently elements were informed through stakeholder engagement.

- 6.8 I had limited involvement in determining the precise detail of each Structure Plan element, however, there is close alignment between the urban design Key Moves and the final PC17 proposal.

7. ASSESSMENT OF PC17

- 7.1 My Urban Design Report prepared in 2024 included a full assessment of PC17 prior to notification. My assessment of PC17 incorporating recent modifications as attached to Mr Grala's evidence has not materially changed, so I continue to refer to the assessment made in my report.

- 7.2 The objectives and policies within the following documents formed the statutory basis to my assessment:

- (a) NPSUD;
- (b) Future Proof Strategy: Future Development Strategy Update 2024-2054; and
- (c) ODP (in particular chapter 25.15 - Urban Design).

- 7.3 My assessment also drew upon topics described within the Ministry for the Environment's Urban Design Protocol (Seven Cs).

- 7.4 The urban design-related elements of the Structure Plan are identified and assessed in summary form below.

- (a) **Plan change extents** – PC17 seeks to rezone land primarily owned by Fonterra. The Plan Change Area is a contiguous area that includes buffered edges, and industrial zone on land surrounding the Manufacturing Site (this excludes any potentially sensitive activities).
- (b) **Te Rapa Stream Corridor** – the extent and definition of the edges of the corridor, and its status in the Structure Plan, are consistent with the design approach to protect and enhance the Te Rapa Stream as a focal point within the Plan Change Area. While ownership and specific design of any amenities within the corridor is not required to be addressed at plan change stage, it will be addressed appropriately at the consenting stage, when more information about adjacent activities is available. The Structure Plan

places a Collector Road along one edge that will provides visibility to the Te Rapa Stream and activation of the riparian corridor.

- (c) **Transport hierarchy and alignments** – the design and layout of key routes is identified clearly and includes strategic connections to the SH1C and potential NRC that can be delivered through subdivision in future. The proposed transport connections to / from and within the Plan Change Area are based on a clear hierarchy of movement functions, supported by appropriate cross sections that cater for all transport modes, including active modes and rail.
- (d) **Road cross sections** – the road cross sections are based on the ODP criteria but appropriately modified for PC17 to support cycling and amenity landscaping.
- (e) **Urban structure** – the proposed structure of the urban development of the Plan Change Area is aligned with the site boundaries and natural topography to create efficient future parcels for development. The Structure Plan's proposed urban block pattern is appropriate as a basis to set out future subdivision.
- (f) **Edge conditions** – Te Rapa Road is maintained as a through-route, supporting landscaped edges to the Plan Change Area. The internal collector is aligned with the Te Rapa Stream and support an internally-serviced development.
- (g) **Focal Area provision** – the Focal Area hub provides amenities for workers within the future development, supportive of a well functioning environment. The hub is conveniently located and provides interfaces to the proposed main road and Te Rapa Stream, giving it a positive urban context. Its scale, at 2 ha, allows flexibility in the specific placement and nature of activities within the mapped overlay.
- (h) **Buffer treatments** – I have reviewed the buffer treatments proposed by the project Landscape Architect and I am comfortable that they would be effective at protecting amenity values at the boundaries of the Plan Change Area, until urbanisation occurs on neighbouring land. The context of the neighbouring land (DIZ) is a factor in determining the appropriate scale of the protection.

- 7.5 Overall, the level of detail in Structure Plan features is reasonably simple and effective in delivering the core design elements required to enable successful development.

Supplementary Report

- 7.6 The Supplementary Report dated 21 August 2025 provides a summary of the amendments made to the Structure Plan, following notification. I did not have a significant involvement in the post-notification work that led to these amendments, but I have reviewed them and updated the Structure Plan graphic accordingly. Notable is the Staging Boundary element on the Structure Plan that indicates how stormwater management areas can be developed in association with stages of industrial land.
- 7.7 I support these minor amendments and they do not materially affect the urban design assessment of the PC17 outcomes.

Proposed Planning Provisions

- 7.8 The specific PC17 planning provisions relevant to urban design are described below, with commentary summarising my assessment of the corresponding urban design outcome:
- (a) **12.4.2 Building Height** - The 20m building height is generally consistent with surrounding industrial development, while the 25m allowance for container stacks supports regional-scale logistics and rail freight operations that are appropriate in this context.
 - (b) **12.4.1 Building Setbacks** - Proposed reductions to building setbacks to Te Rapa Road are intended to improve land-use efficiency and would affect overall urban form. Large setback distances to buildings would be likely to be allocated for outdoor plant and equipment storage, which can have poor amenity outcomes compared with a building. The smaller building setback is appropriate as it produces a better amenity outcome for Te Rapa Road.
 - (c) **12.4.6 Landscaping** - Increased setbacks to buildings (10m) from the Te Rapa Stream to support ecological and cultural functions have been provided. Interfaces with the NIMT rail corridor, rural-residential areas, and Te Awa Lakes will be softened through landscape buffers (5m depth). These buffers are appropriate to

protect amenity values, given the expected future context of industrial development within adjacent land.

- (d) **12.4.7 Site Layout** - Restricting plant or machinery from the front yard of the buildings (or within any setback) is an appropriate standard to promote a high quality streetscape appearance.
- (e) **Street designs (cross sections)** - Includes street trees, cycle facilities, vehicle parking bays and shows consideration of adjacent land uses. These support good amenity and environmental outcomes and represent good urban design through a character that responds to the street hierarchy and future industrial activity.
- (f) **The Focal Area (overlay and Activity Status Table)** - Enables small-scale retail and other uses, including limiting the scale of food and beverage operations to 800m² gross floor area and making supermarkets a non-complying activity. This is assessed by Insight Economics as suitable to avoid the type of retail that would draw custom away from established retail centres.⁴ Therefore, the provision positively addresses good urban design by providing for the daily needs of workers within the industrial zone to improve their wellbeing, without diminishing the role of other retail centres.

7.9 Other than the examples above, detailed design provisions governing the form of development within private sites and buildings are not proposed as part of PC17. This approach is supported because it is consistent with the intended design outcome to enable a wide range of scales and types of industrial activities within the zoned land. There are not likely to be any significant adverse effects on established amenity values considering the Plan Change Area is contained with buffering to all sides. Influence over the architectural, landscaping and site layout elements of future activities is best managed through design guidelines and an assessment of development proposals on a case-by-case basis at the consenting stage.

7.10 The ODP provides for subdivision within the TRINZ as a discretionary activity and future development will be expected to comply with the objectives and policies of the ODP (including Objective 23.2.2) that promote good urban design outcomes.

⁴

Statement of Evidence of Fraser Colegrave dated 7 October 2025 at [10.5].

8. SECTION 42A REPORT

- 8.1 The Section 42A Report considers that PC17 aligns with sound urban design practice, is consistent with Future Proof Strategic Directive 10.6, and Objective 1 of the NPS-UD to achieve a well-functioning urban environment.

9. RESPONSE TO SUBMISSIONS

- 9.1 I have read the submissions received on PC17 that raise concerns relating to urban design matters. I address the topics raised in submissions below.

Restricting non-industrial activities or addressing the potential for proliferation of non-industrial activities in the Zone

- 9.2 Submissions 14.21, 14.22 and others sought the PC17 planning provisions restrict non-industrial activities.

- (a) My experience through designing numerous industrial developments is that the types of activities occurring within industrial zones are broad and evolve in response to technical and commercial trends. For example:
 - (i) Large-scale building material import and assembly, automotive and machinery services typically include a sales and integrated retail function; the two activities are often difficult to differentiate in terms of defining gross floor area between retail and non-retail areas.
 - (ii) Industrial-scale plants containing activities involving information technology, healthcare, food packing and distribution, or specialised education facilities often include multiple administrative and service functions within an integrated (campus-style) site.
 - (iii) Large scale recreational activities including indoor sports facilities are sometimes housed within large warehouse buildings, generate higher noise levels, and are attracted to locations near arterial and motorway corridors.
- (b) My view is that a wide range of activities should be enabled and that the effects of these activities alongside traditional (factory-based) industry can be harmonious. The industrial zone is often the only feasible zone that certain types of activities can establish in due to

their large site scale, noise generation, on site materials storage and / or infrastructure requirements.

Building height at interfaces to other zone boundaries

- 9.3 The submission lodged by Te Awa Lakes questioned the proposed building height at the interface to other zone boundaries.⁵
- 9.4 The information available about the Te Awa Lakes development (see Figure 3 below) shows the proposed development adjacent to the northern edges of the Plan Change Area as commercial / industrial land uses (including large areas of car parking).



Figure 3 – Plan showing Aerial Photo overlaid with Te Awa Lakes Masterplan
(excerpt retrieved from www.teawalakes.co.nz on 9 September 2025).

- 9.5 The building heights at 20m at the interface with Te Awa Lakes are not problematic in relation to anticipated amenity effects, and I do not believe a reduction in height will lead to better urban design outcomes.
- 9.6 This is due to the context of the area including non-residential activity and large scale development including roading and the Manufacturing Site. A 20m high built edge, even if it did eventuate, would not generate adverse shading effects,

⁵ Submission number 14.24.

or adversely impact significant views or sense of place outcomes for neighbours. A small strip of land at the northern boundary, near the Waikato River, is proposed to be zoned Natural Open Space Zone and may also contribute some space and amenity along this edge.

Extent of the Plan Change Area

- 9.7 Multiple submissions raised matters relating to the Plan Change Area not including all Te Rapa DIZ land and requesting inclusion of further land to be live-zoned.⁶
- 9.8 The zoning of this area remains as Te Rapa DIZ land so it is able to be rezoned in future plan change requests once the appropriate technical work has been undertaken. The scope of PC17 technical assessments was guided by land ownership (Fonterra) and is limited as to the consideration of land not included in the Plan Change Area. Notwithstanding that, I support the extent of the Plan Change Area from an urban design perspective.

10. CONCLUSION

- 10.1 Overall, PC17 reflects sound urban design practice and will establish the fundamental elements that enable a well-functioning environment to be delivered. I support PC17, primarily because:
- (a) The Plan Change Area is highly suitable for development of industrial activity. This is due to the presence of the Manufacturing Site, the strong strategic transport linkages, and the favourable topography of the Plan Change Area.
 - (b) The wider context of the Te Rapa location aligns well with the industrial intended use, being a “corridor” of industrial land alongside SH1C.
 - (c) Character and identity within future development is supported by the existing Manufacturing Site, the Waikato River, and the Te Rapa Stream, which are protected through PC17 and will contribute to a unique sense of place.
 - (d) A central Focal Area contributes to the functioning of the Plan Change Area to improve wellbeing. Street design, open spaces and

⁶ For example, submissions 3.1, 4.1–4.10, 5.1, 7.1–7.4, 8.1–8.4, 9.1–9.4, 12.1, 17.1, 18.1.

other elements in the structure plan are aligned to urban design best practice.

Samuel Coles
7 October 2025