

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of Plan Change 17: Te Rapa North Industrial Private Plan Change to the Hamilton City Operative District Plan

**SUMMARY STATEMENT OF BRIAR ALAYNE BELGRAVE
ON BEHALF OF SAM AND ALISA COLEMAN, SCOTT MATHIESON, GRAEME
BODDY, HAYDEN PORTER, PAUL AND GLORIA STONE AND WEN SEN SHIH &
HSIU-JUNG HUANG**

1. INTRODUCTION

Background and experience

- 1.1 My name is Briar Alayne Belgrave. I am a partner at Barker & Associates Limited ('**B&A**'), an independent planning consultancy. My qualifications are set out in my evidence in chief ('**EiC**').
- 1.2 This summary statement provides a summary of my EiC and also responds to certain matters raised since my EiC was filed. It covers:
 - (a) The scope of proposed Private Plan Change 17 ('**PPC17**');
 - (b) A summary of my EiC prepared on behalf of the Submitters (Meadowview Lane Submitters);
 - (c) The Applicant's rebuttal evidence; and
 - (d) The s42A Addendum Report.

2. SCOPE OF PROPOSED PRIVATE PLAN CHANGE 17

- 2.1 The matters of scope are addressed in Section 4 of my EiC statements dated 30 October 2025.

2.2 Briefly, I note the following key matters which are relevant from a planning perspective:

- (a) Generally, with the exception of one objective under the Operative District Plan which I consider should be retained, the relief sought by the Meadowview Lane Submitters does not significantly alter the objectives of PPC17.
- (b) The relief sought by the Meadowview Lane Submitters respond directly to the changes that are proposed, and in particular, seek an option (removal of the entire Deferred Industrial Area) that was already identified as a reasonably practicable option within the section 32 Report relating to the notified Plan Change;
- (c) In my opinion, there is no real risk that persons potentially affected by the Submissions and relief sought would have been denied an effective opportunity to participate given the strategic context of the Deferred Industrial Area and submitters who engaged with the submissions and further submissions process under PPC17.

3. SUMMARY OF MY EVIDENCE IN CHIEF

- 3.1 My EiC prepared on behalf of the Meadowview Lane Submitters raises two key planning matters that I consider to remain outstanding.
- 3.2 The first key issue relates to potential strategic planning issues and associated effects arising from the proposed structure planning approach under PPC17.
- 3.3 Structure planning is a well-established tool for managing greenfield urban growth, providing an integrated framework for land use, open space, transport networks and infrastructure. Best-practice structure planning should be comprehensive and evidence-based across the whole development area (or a logically defined sub-area) so that coordinated outcomes are achieved and cumulative effects of urbanising can be comprehensively identified and managed. In my view, PPC17 in its current form does not follow that best-practice model. The proposed live zoning is a discrete industrial holding defined by ownership boundaries within the centre of the wider Deferred Industrial Area, which can risk ad-hoc and fragmented development.
- 3.4 I remain of the view that PPC17 in its current form has the potential to undermine integrated planning and create uncertainty for other landowners in the Deferred Industrial Area, including by shifting unresolved interface,

transport and servicing matters onto neighbouring sites. Notably, in the absence of having considered adjoining land parcels, it is unclear how PPC17 can ensure a robust and comprehensive approach that does not adversely affect surrounding landowners.

- 3.5 The second key issue relates to the section 32 evaluation that has been undertaken to date. While other reasonably practicable options were identified, to my knowledge, no assessment has been provided with respect to the costs and benefits, and efficiency and effectiveness of these options. The detail of the evaluation has generally been confined to the plan change that has been progressed.
- 3.6 In my view, excluding these other options from the section 32 analysis relating to the proposed plan change does not correspond to the scale and significance of the proposed change, and I consider that the entirety of the Deferred Industrial Area should have been assessed more comprehensively to determine the most efficient and effective option.
- 3.7 In evaluating practicable options in accordance with the requirements of Section 32, I consider that the most efficient and effective method is progressing a Structure Plan for the full Deferred Industrial Area and subsequently live zoning this land. The Section 32AA analysis attached to my evidence includes figures which demonstrate that this scale of structure planning is in keeping with the approach under the Operative District Plan, where existing structure plans have been prepared for entire and cohesive spatial areas.
- 3.8 I would support expert conferencing and consider agreement could reasonably be reached between the independent experts in terms of the further work that is required to enable a new structure Plan to be prepared to include the Deferred Industrial Area.

4. THE APPLICANT'S REBUTTAL PLANNING EVIDENCE AND ADDENDUM SECTION 42A HEARING REPORT

- 4.1 The Applicant's rebuttal planning evidence dated 20 November 2025 and the Addendum Section 42A Hearing Report identify certain further assessments or engagement that would need to be undertaken in order to extend the live zoning to land outside of the current PPC17 area.
- 4.2 With respect to the relief sought by the Meadowview Lane Submitters, I do not anticipate the further assessments required to give effect to the relief sought

would be particularly onerous or time consuming, and could build upon the work already undertaken by Council when planning for the original industrial zone, and by Fonterra in relation to PPC17. This would include building upon the engagement with Tangata Whenua already undertaken by Fonterra, and an assessment against the Waikato RPS, being a relatively simple exercise.

- 4.3 This work has not been progressed in the interim on the understanding that additional technical work from Fonterra would be made available following the filing of their primary evidence and on the basis that until the release of the Addendum Section 42A Report on 27 November, the Reporting Officer was not in a position to make a recommendation on PPC17 due to a number of gaps in the information provided by Fonterra. The issue of scope has also been flagged as a point for determination by the Hearings Panel prior to it being in a position to consider the relief sought by Submitters on the merits. Given this level of uncertainty, I consider that undertaking this level of work prior to the hearing would be an unreasonable cost to submitters.
- 4.4 However, there is nothing precluding this work from being undertaken if the Hearings Panel consider that it would be worthwhile in order to make a final determination on the scope of the Plan Change. I consider that the scope of the additional technical work required could be reasonably agreed through expert conferencing with relevant parties and without creating lengthy delays to the plan change process.
- 4.5 Paragraph 4.12 of the Addendum Report identifies that the inclusion of the Meadowview Lane Submitters' properties only within PPC17 would result in an incoherent zoning pattern. While these landowners are those who have continued to pursue inclusion within PPC17, the section 32AA analysis attached to my EiC confirmed that the most efficient and effective method is to consider the entirety of the Deferred Industrial Area, rather than isolated landholdings.
- 4.6 Additionally, paragraph 4.8 of the Applicant's rebuttal planning evidence identifies that rezoning land at Meadowview Lane in the absence of a confirmed route for the Northern River Crossing would likely result in inefficient land use and may frustrate the future delivery of the NRC. In my view, this is not consistent with the approach adopted in the section 42A amendments to provisions, where 3.9.2.5.c has been amended to identify that the extension of Koura Drive indicated on the Structure Plan is to "protect the future NRC between Te Rapa Road and Koura Drive". This provision also confirms that the intent is for the East-West Road shown in the PPC17 Structure Plan to form part of the NRC.

4.7 I consider that it is not necessary or efficient to defer live zoning on the basis that detailed design for the NRC has not occurred. Given the NRC has yet to be designated and there is no confirmed alignment of that road, the same argument of potentially frustrating the designation process could be applied to the Fonterra land proposed to be rezoned.

5. CONCLUSION

5.1 In summary, I remain of the view that from a planning perspective, addressing the entirety of the Deferred Industrial Area is necessary to achieve an efficient and effective planning framework.

5.2 In my view, an updated Structure Plan could be prepared efficiently should effective conferencing between experts be able to be undertaken.

Briar Alayne Belgrave

3 December 2025