

Section 32AA Further Evaluation – Private Plan Change 17 (PPC17)

Section 32AA of the Resource Management Act requires that any changes made or proposed to a plan since its initial evaluation report must undergo a subsequent evaluation. This additional assessment is to be undertaken in accordance with sections 32(1) through 32(4), with the level of detail reflecting the extent and importance of the proposed changes.

This evaluation does not include an assessment of the restructured provisions (to better align with District Plan structure), minor wording changes to improve clarity or consistency, or any consequential amendments, due to their negligible impact.

Section 32(1)(a) Further Evaluation – Chapter 12

Section 32(1)(a) Examine the extent to which the objectives and/or policies of the proposal being evaluated are the most appropriate way to achieve the purpose of this Act	
Further Changes	Assessment
Policy 12.2.1f added to prevent direct access to the future Northern River Crossing.	<ul style="list-style-type: none">The change to Policy 12.2.1f adds strength to the protection of this future strategic route, giving effect also to the PPC17 Structure Plan and rules framework (e.g., Rule 12.3.1, 12.4.1 v.)
Updates to the Objective and Policy framework at 12.2.2 and 12.2.3, on the basis that the proposed objective and associated policies were somewhat narrow / limited and did not respond to the nature and complexity of the infrastructure matters relevant to the zone. Tailored objectives and associated policies which respond to and separate out the key three waters and transportation matters have been introduced.	<ul style="list-style-type: none">The introduction of Objective 12.2.2 and associated Policies 12.2.2 a-d reflect Hamilton City Council's current position, where development must be in accordance with the Integrated Catchment Management Plan (ICMP), need to align with water allocation and wastewater capacity constraints (noting water allocation will remain a challenge for the city until the current consent expires in 2044, and the upgrades to Pukete Wastewater Treatment Plant are currently unfunded). Hamilton City Council's preference is that PPC17 can proceed if infrastructure requirements are assessed and confirmed for each stage through the Infrastructure Plan and implemented before development occurs.Stream erosion is an existing issue, and PPC17 will result in increased stormwater volumes discharged to Te Rapa stream, exacerbating stream erosion in the reaches downstream of SH1C. The volume increase needs to be mitigated in accordance with the ICMP.The introduction of Objective 12.2.3 and associated Policies 12.2.3 a-d reflects the vision for Hamilton City Council, that suitable and appropriate transportation

Section 32(1)(a)

Examine the extent to which the objectives and/or policies of the proposal being evaluated are the most appropriate way to achieve the purpose of this Act

Further Changes	Assessment
	<p>must be designed and constructed in a coordinated and integrated manner, does not compromise of wider network interventions including protecting the Bus Rapid Transit.</p> <ul style="list-style-type: none"> • Clearly separating three waters and transportation matters aids in clarity and provides and important reinforcement of the proposed rules framework and the ability to provide a robust policy assessment when considering / processing a resource consent application.

Section 32(1)(b) Further Evaluation

Section 32(1)(b) requires examination whether the provisions in the proposal are the most appropriate way to achieve the objectives by:

- Identifying other reasonably practicable options for achieving the objectives; and
- Assessing the efficiency and effectiveness of the provisions in achieving the objectives; and
- Summarising the reasons for deciding on the provisions.

Section 32(1)(b) Further Evaluation – Chapter 12

Further Changes	Other reasonably practicable options	Efficiency and effectiveness (including costs and benefits and risks of acting or not acting)	Reasons for deciding on the provisions
Policy 12.2.1f added to prevent direct access to the future Northern River Crossing and to give effects to Objective 12.2.1.	Retain the version put forward in Rebuttal Evidence (dated 20 November 2025).	<u>Benefits</u> Ensures the Northern River Crossing is appropriately protected. <u>Costs</u> None. <u>Risks of acting/ not acting</u> The existing provisions do not give primacy	The existing provisions do not give primacy to the vision of the Northern River Crossing. The policies have been slightly expanded to provide this clarity and ensure this strategic corridor is appropriately protected.

Further Changes	Other reasonably practicable options	Efficiency and effectiveness (including costs and benefits and risks of acting or not acting)	Reasons for deciding on the provisions
		to the vision for the future Northern River Crossing. Not acting could result in unintended consequences and associated effects where access directly to the future NRC is enabled.	
Policies 12.2.2a-d added to account for three waters-related policies, with more emphasis on water allocation and wastewater capacity issues.	<p>Retain the version put forward in Rebuttal Evidence (dated 20 November 2025).</p> <p>Do nothing and rely on existing policies in other chapters of the District Plan that broadly achieved the Objective.</p>	<p>Benefits</p> <p>Ensures that three waters infrastructure is provided in an integrated and coordinated manner. The introduction of Policies 12.2.2 a-d reflect Hamilton City Council's current position, where water allocation will remain a challenge for the city until the current consent expires in 2044, and the upgrades to Pukete Wastewater Treatment Plant are currently unfunded. Hamilton City Council's preference is that PPC17 can proceed if infrastructure requirements are assessed and confirmed for each stage through the Infrastructure Plan and implemented before development occurs.</p> <p>Additionally, stream erosion is an existing issue, and PPC17 will result in increased stormwater volumes discharged to the stream, exacerbating stream erosion in the reaches downstream of SH1C. The volume increase needs to be mitigated in accordance with the ICMP.</p> <p>Costs</p> <p>Reduced flexibility and costs to progress assessments (including the Infrastructure</p>	<p>The changes reflect the challenges that Hamilton City Council is currently facing. Water allocation is a significant challenge for Hamilton until the current consent expires in 2044, and the upgrade to Pukete Wastewater Treatment Plant are currently unfunded. Management of an existing issue (being the downstream erosion associated with Te Rapa Stream) requires an integrated / coordinated response as part of development.</p> <p>The changes provide greater clarity and support the proposed objective and associated rules framework and an ability to assess and control/constrain three-waters related matters and ensure that key infrastructure considerations can be resolved.</p>

Further Changes	Other reasonably practicable options	Efficiency and effectiveness (including costs and benefits and risks of acting or not acting)	Reasons for deciding on the provisions
		<p>Plan) at the consent stage.</p> <p>Risks of acting/ not acting</p> <p>The current provisions could prevent future developments from being appropriately serviced without a thorough and proper assessment, adversely impact on Hamilton's three waters network and ultimately the receiving environment. PPC17 will result in increased stormwater volumes discharged to Te Rapa stream, exacerbating stream erosion in the reaches downstream of SH1C.</p>	
Policies 12.2.3a-d added to account for transport-related issues.	<p>Retain the version put forward in Rebuttal Evidence (dated 20 November 2025).</p> <p>Do nothing and rely on existing policies in other chapters of the District Plan that broadly achieved the Objective.</p>	<p>Benefits</p> <p>Ensures that suitable and appropriate transport upgrades are designed and constructed in a coordinated and integrated manner and which do not compromise wider network interventions (transport upgrades and improvements) including protecting the Bus Rapid Transit.</p> <p>Costs</p> <p>None.</p> <p>Risks of acting/ not acting</p> <p>The existing wording does not give primacy to the vision of the Bus Rapid Transit.</p>	The dynamic nature of land use and the transport environment in and around Te Rapa is an acknowledged challenge. The changes provide greater clarity and support the proposed objectives and associated rules framework and an ability to assess and resolve key infrastructure upgrade requirements.
The inclusion of 'Wet Industry' at 12.3.1 along with a definition based on known water allocation constraints in the	Do nothing.	<p>Benefits</p> <p>Restrictions to wet industry will prevent future developments adversely affecting Hamilton's three waters network.</p>	Water allocation is a significant challenge for Hamilton until the current consent expires in 2044, and the upgrades to Pukete Wastewater Treatment Plant are currently

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area.		<p>Costs Reduced flexibility.</p> <p>Risks of acting/ not acting Omitting wet industry could prevent future developments from being serviced or adversely impact Hamilton's three waters network.</p>	unfunded. Restriction to wet industries will prevent future developments adversely affecting Hamilton's three waters network.
In the absence of any transportation assessment of industrial traffic accessing Hutchinson Road from Lot 1 DP551065, access restrictions have been amended in 12.5.1.	Retain the version put forward in Rebuttal Evidence (dated 20 November 2025).	<p>Benefits Improved clarity.</p> <p>Costs None.</p> <p>Risks of acting/ not acting The current provision does not recognize the full extent of the proposed sub-blocks or specific properties within them and the associated access arrangements. Clarity as to these arrangements / restrictions ensures the management of potential effects associated with heavy vehicle traffic.</p>	The change recognizes the full extent of the proposed sub-blocks and associated access arrangements.

Section 32(1)(b) Further Evaluation – Chapter 3.9

Further Changes	Other reasonably practicable options	Efficiency and effectiveness (including costs and benefits and risks of acting or not acting)	Reasons for deciding on the provisions
Revision to 3.9.2.5.c. to better reflect the criticality of the Northern River Crossing and the role that the East-West Road will play in doing that.	Retain the version put forward in Rebuttal Evidence (dated 20 November 2025).	<p>Benefits Ensures the Northern River Crossing is appropriately recognized within the Structure Plan construct.</p> <p>Costs None</p> <p>Risks of acting/ not acting The existing wording does not give primacy to the vision of the Northern River Crossing.</p>	Gives clear recognition to the Northern River Crossing.
<u>Revision to 3.9.2.5.e. to update the cross-section to provide a flush median and walking and cycling facilities in the berm but is reduced from the District Plan standard to fit within the existing road reserve (20.1m).</u>	<u>Retain the version put forward in Rebuttal Evidence (dated 20 November 2025).</u>	<p>Benefits The updated cross-section will provide space for vehicles accessing the existing industrial vehicle crossings along Old Ruffell Road and any new vehicle crossings to PPC17 where it has frontage to Old Ruffell Road.</p> <p>Costs Preparation of design and implementation of upgrades.</p> <p>Risks of acting/ not acting The existing carriageway width is insufficient, potentially leading to head-on crashes.</p>	<p>Old Ruffell Road does not currently meet the District Plan standards for an industrial collector, which requires 11m carriageway with footpath and cycle facilities within a 26.5m corridor width.</p> <p>The function of Old Ruffell Road will be the same as the Spine Road within PPC17 and will carry 325vph (initially). The cross-section should be consistent along the entire length of Old Ruffell Road and the Spine Road.</p> <p>The existing carriageway width is around 8.4m and insufficient to allow a through vehicle to pass a turning vehicle without crossing the centreline which could lead to head-on crashes.</p>

Further Changes	Other reasonably practicable options	Efficiency and effectiveness (including costs and benefits and risks of acting or not acting)	Reasons for deciding on the provisions
Inclusion at 3.9.2.5.g to include the upgrade of Old Ruffell Road to Collector status and including walking and cycling as an upgrade as part of the first stage of development because of introduced traffic volumes and associated safety requirements.	Retain the version put forward in Rebuttal Evidence (dated 20 November 2025).	<p>Benefits</p> <p>The changes reflect Hamilton City Council's vision to provide a safe and efficient roading network and to support and encourage use of public transport. The changes are based on what the applicant has proposed but strengthened to provide clarity.</p> <p>Costs</p> <p>Preparation of design and implementation of infrastructure.</p> <p>Risks of acting/ not acting</p> <p>Poor transportation outcomes (including reduced safety) along Old Ruffell Road.</p>	Supports the early delivery of a safe and efficient Collector Road servicing the first stage and ultimate development of the Structure Plan area.
A new provision 3.9.2.5.o has been inserted to provide safe crossing places across Te Rapa Road at bus stops and adjacent land use integration to/from the Te Rapa North Structure Plan area.	<u>Retain the version put forward in Rebuttal Evidence (dated 20 November 2025).</u>	<p>Benefits</p> <p>The addition will ensure that safe crossing will be provided regardless of development order.</p> <p>Costs</p> <p>Preparation of design and implementation of upgrades.</p> <p>Risks of acting/ not acting</p> <p>Relying on the TAL consent condition for the signalised intersection upgrade may result in the PPC17 development occurring ahead of the intersection upgrade leading to adverse safety effects from the additional PPC17 traffic using the existing intersection.</p>	Until the signals are installed pedestrians walking between the bus stops on Te Rapa Road and the PPC17 area will need to use the existing pedestrian crossing at the Te Rapa Road/ Ruffell Road signalised intersection to safely cross Te Rapa Road. This would require new footpath connections along Te Rapa Road and crossing of McKee Street to connect to the bus stops. McKee Street has footpath along the southern side with planted median and no dedicated crossing location for pedestrians or path on the north side to connect to.
Updating 3.9.2.6.b. and c. to	Retain the version put forward in	Benefits	The changes reflect the challenges that

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<p>highlight the importance of providing an Infrastructure Plan at each stage of development to manage three waters servicing. The first Infrastructure Plan must also consider the full development (e.g., masterplan approach)</p>	<p>Rebuttal Evidence (dated 20 November 2025).</p>	<p>Enables three waters infrastructure requirements to be identified and appropriately assessed as part of the consenting process across all stages. This requirement ultimately ensures development can proceed in a coordinated and integrated manner while key three-waters infrastructure considerations are resolved.</p> <p>Costs</p> <p>Requires upfront effort to prepare and peer-review the Infrastructure Plan.</p> <p>Risks of acting/ not acting</p> <p>The current provision is limited in terms of breadth and could prevent future developments from being serviced or adversely impact Hamilton's three waters network and lead to adverse effects on the receiving environment.</p>	<p>Hamilton City Council is currently facing. Water allocation is a significant challenge for Hamilton until the current consent expires in 2044, and the upgrades to Pukete Wastewater Treatment Plant are currently unfunded. The revision provides further clarity and a process to assess and resolve the issue. Additionally, erosion of Te Rapa stream is an existing issue, and PPC17 will result in increased stormwater volumes discharged to the stream, exacerbating stream erosion in the reaches downstream of SH1C. The volume increase needs to be mitigated in accordance with ICMP, and the details of strategic stormwater infrastructure and how this will be delivered will need to be embedded within the Infrastructure Plan.</p> <p>As there is currently no funding allocated for the physical works (related to stream erosion) in Hamilton City Council's Long Term Plan, it is critical that the requirement to prepare an Implementation and Funding Plan be included as a provision in PPC17.</p> <p>Strongly supports and gives effect to the objectives and policy framework.</p>
<p>Inclusion of a range of additional minimum infrastructure requirements at Rule 3.9.3.2 (Transport Upgrades) to reflect important early requirements in</p>	<p>Retain the version put forward in Rebuttal Evidence (dated 20 November 2025).</p>	<p>Benefits</p> <p>Enables transportation infrastructure requirements to be identified and appropriately assessed as part of the</p>	<p>Provides a clear framework that ties infrastructure upgrades to staged development, supported by a Board ITA post-20-hectares to manage potential uncertainties and cumulative effects</p>

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<p>the first stage to respond to traffic generation and safety requirements and additional requirements for later stages, including a requirement for a Broad ITA to respond to uncertainties and cumulative effects as development across the zone.</p>		<p>consenting process across all stages. This requirement ultimately ensures development can proceed in a coordinated and integrated manner while key infrastructural considerations are resolved. Requiring a Borad ITA after 20ha has been developed enables the dynamic nature of land use and the transport network in Te Rapa to be reconsidered, including cumulative effects.</p> <p>Costs</p> <p>Requires upfront effort to prepare and peer-review transport upgrade designs at each consent stage and produce a Borad ITA after 20 hectares of development. Reduced flexibility.</p> <p>Risks of acting/ not acting</p> <p>The current provision is limited in terms of breadth and could prevent future developments from being serviced or adversely impact Hamilton's transportation network and lead to adverse effects on the receiving environment. Could lead to uncoordinated development and uncertainty for consent processing and potential delay in timely delivery of necessary upgrades.</p>	<p>associated with the dynamic land use pattern in and around Te Rapa.</p> <p>Strongly supports and gives effect to the objectives and policy framework.</p>
<p>A substantial reworking of Rule 3.9.3.3 (Strategic Three Waters Infrastructure):</p> <ul style="list-style-type: none"> • The Infrastructure Plan 	<p>Retain the version put forward in Rebuttal Evidence (dated 20 November 2025).</p>	<p>Benefits</p> <p>Enables three waters infrastructure requirements (triggers) to be identified including Enabling Works and three waters</p>	<p>Requirements have been expanded to manage the actual and potential effects on the receiving environment, both internal and external to the site, associated with the</p>

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<p>requirement has been moved from the Note section to the table to give primacy.</p> <ul style="list-style-type: none"> • The intent of the staging framework has been clarified. • Description has been further developed to strengthen the requirement for an Infrastructure Plan. • More emphasis on water allocation and wastewater capacity issues in the description and staging table. • Key enabling works requirements specified in the table, including ability to align with HCC on an interim solution (all Three Waters). • Required culverts indicated in Mr King's Stormwater Evidence (paragraph 7.16) have been added to the table. 		<p>infrastructure, allocation and capacity matters to be considered and interventions implemented as part of the consenting process across all stages. This includes engaging with other relevant stakeholders as appropriate. This requirement ultimately ensures development can proceed in a coordinated and integrated manner with key infrastructure provided.</p> <p>Costs</p> <p>Requires upfront effort to prepare and peer-review the Infrastructure Plan.</p> <p>Risks of acting/ not acting</p> <p>The current provision is limited in terms of breadth and could prevent future developments from being serviced or adversely impact Hamilton's three waters network and lead to adverse effects on the receiving environment. Could lead to uncoordinated development and uncertainty for consent processing and potential delay in timely delivery of necessary upgrades.</p>	<p>uncertainty around staging and the 'plug and play' approach proposed by the applicant.</p> <p>Strongly supports and gives effect to the objectives and policy framework.</p>

Section 32(1)(b) Further Evaluation – Appendix 1.2

Further Changes	Other reasonably practicable options	Efficiency and effectiveness (including costs and benefits and risks of acting or not acting)	Reasons for deciding on the provisions
<p>1.2.2.30 amendments:</p> <ul style="list-style-type: none"> • Requirements strengthened with emphasis on water allocation and wastewater capacity. • Alignment with Te Rapa Integrated Catchment Management Plan strengthened. 	<p>Retain the version put forward in Rebuttal Evidence (dated 20 November 2025).</p>	<p>Benefits</p> <p>Identifies the requirement for inclusion and appropriate assessment as part of the consenting process across all stages. This requirement ultimately ensures development can proceed in a coordinated and integrated manner while key transportation infrastructure considerations are resolved.</p> <p>This requirement ultimately ensures development can proceed in a coordinated and integrated manner while key three-waters infrastructure considerations are resolved.</p> <p>Costs</p> <p>Requires upfront effort to prepare and peer-review the Infrastructure Plan.</p> <p>Risks of acting/ not acting</p> <p>The current provision is limited in terms of breadth and could prevent future developments from being serviced or adversely impact Hamilton's three waters network and lead to adverse effects on the receiving environment. Could lead to uncoordinated development and uncertainty for consent processing and potential delay in timely delivery of necessary upgrades.</p>	<p>Requirements have been expanded for clarity and to manage the actual and potential effects on the receiving environment, to reflect the indicative 'plug and play' staging proposed, but also having consideration of water availability and allocation and wastewater treatment capacity alongside the infrastructure itself. The requirements will also ensure a high degree of engagement with stakeholders to reach alignment on appropriate interventions (including how they might be funded) or critical allocation and capacity matters.</p> <p>Strongly supports and gives effect to the objectives and policy framework.</p>
1.2.2.31d added to require	Retain the version put forward in	Benefits	It is important that the engagement with

Further Changes	Other reasonably practicable options	Efficiency and effectiveness (including costs and benefits and risks of acting or not acting)	Reasons for deciding on the provisions
engagement with Mana Whenua.	Rebuttal Evidence (dated 20 November 2025).	<p>Ensure engagement with mana whenua is explicit within the requirements to uphold the principles set within Te Ture Whaimana.</p> <p>Costs None.</p> <p>Risks of acting/ not acting The existing wording is inconsistent with other provisions, where engagement with mana whenua is properly recognized.</p>	mana whenua is explicit within the requirements to uphold the principles set within Te Ture Whaimana.

Section 32(1)(b) Further Evaluation – Appendix 1.3.3

Further Changes	Other reasonably practicable options	Efficiency and effectiveness (including costs and benefits and risks of acting or not acting)	Reasons for deciding on the provisions
Q3b amended to account for water allocation and wastewater capacity.	Retain the version put forward in Rebuttal Evidence (dated 20 November 2025).	<p>Benefits Ensures that water allocation and wastewater treatment capacity are available as matters for consideration when assessment applications for resource consent</p> <p>Costs Additional assessment requirements.</p> <p>Risks of acting/ not acting The lack of a current criterion limits the Council's ability to control or constrain development where this issue has not been considered or resolved.</p>	It reflects the challenges that Hamilton City Council is currently facing. Water allocation is a significant challenge for Hamilton until the current consent expires in 2044, and the upgrades to Pukete Wastewater Treatment Plant are currently unfunded. The Council needs to have the ability to manage and control this matter as part of the consenting process.

Further Changes	Other reasonably practicable options	Efficiency and effectiveness (including costs and benefits and risks of acting or not acting)	Reasons for deciding on the provisions
Q5c amended to reflect the changes proposed on 3.9.3.2b.	Retain the version put forward in Rebuttal Evidence (dated 20 November 2025).	<p>Benefits</p> <p>The amendments reflect the changes in 3.9.3.2b and create a more coherent assessment criterion.</p> <p>Costs</p> <p>None.</p> <p>Risks of acting/ not acting</p> <p>The current provision is limited in terms of breadth and could prevent future developments from being serviced or adversely impact Hamilton's transportation network and lead to adverse effects on the receiving environment. Could lead to uncoordinated development and uncertainty for consent processing and potential delay in timely delivery of necessary upgrades.</p>	For the reasons stated in the assessment of Rule 3.9.3.2 (Transport Upgrades), changes are made to ensure consistency.
Q5e revised to allow assessment of connections between the PPC17 area and bus stops on Te Rapa Rd.	Retain the version put forward in Rebuttal Evidence (dated 20 November 2025).	<p>Benefits</p> <p>The addition will ensure that safe crossing will be provided regardless of development order.</p> <p>Costs</p> <p>Preparation of design and implementation of upgrades.</p> <p>Risks of acting/ not acting</p> <p>Relying on the TAL consent condition for the signalised intersection upgrade may result in the PPC17 development occurring ahead of the intersection upgrade leading to adverse safety effects from the additional</p>	Until the signals are installed pedestrians walking between the bus stops on Te Rapa Road and the PPC17 area will need to use the existing pedestrian crossing at the Te Rapa Road/ Ruffell Road signalised intersection to safely cross Te Rapa Road. This would require new footpath connections along Te Rapa Road and crossing of McKee Street to connect to the bus stops. McKee Street has footpath along the southern side with planted median and no dedicated crossing location for pedestrians or path on the north side to connect to.

Further Changes	Other reasonably practicable options	Efficiency and effectiveness (including costs and benefits and risks of acting or not acting)	Reasons for deciding on the provisions
		PPC17 traffic using the existing intersection.	
Q5f revised to provide for right turning at Access 2 and avoid the adverse effects of U-turning at the Te Rapa Road / Hutchinson Road intersection.	Retain the version put forward in Rebuttal Evidence (dated 20 November 2025).	<p>Benefits Providing right turning at Access 2 will ensure all development traffic is accommodated at the intersection and avoid the need for any U-turning at the Hutchinson Road roundabout.</p> <p>Costs Preparation of design and implementation of upgrades.</p> <p>Risks of acting/ not acting There is a risk that development occurring ahead of the upgrade could lead to adverse safety effects from the additional PPC17 traffic.</p>	Ensures a safe transport network is established to service PPC17 without compromising neighbouring developments.