

21 May 2025

Hamilton City Council  
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Dear Mark Davey

**PLAN CHANGE 17: TE RAPA NORTH INDUSTRIAL PRIVATE PLAN CHANGE**

Thank you for the opportunity for the Waikato District Council to submit on the proposed Plan Change 17: Te Rapa North Industrial Private Plan Change. Please find attached the Waikato District Council's submission, formally approved under delegated authority, on 9 October 2023.

Should you have any queries regarding the content of this document, please contact Elsa Snyders, Senior Spatial Planner, on [spatial.planning@waidc.govt.nz](mailto:spatial.planning@waidc.govt.nz).

Kind Regards



**Will Gauntlett**

**General Manager – Strategy and Growth**

**WAIKATO DISTRICT COUNCIL**

**To: Hamilton City Council**

**Submitter Details:**

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**This is a submission on:**

Plan Change 17 – Te Rapa Private Plan Change

**I could not gain an advantage in trade competition through this submission.**

The Waikato District Council **is directly affected** by an effect of the subject matter of the submission that:

- a) adversely affects the environment; and
- b) does not relate to trade competition.

**The specific provisions of the proposal that my submission relates to are:**

- Planning Direction
- Stormwater / Integrated Catchment Plan
- Wastewater
- Transportation / Roading Network
- Ecological Value and Effects (terrestrial and freshwater)

**My submission is:**

The following are the Waikato District Council's submission points:

Planning Direction

1. Although this proposed Private Plan Change sits outside the Waikato District Council's jurisdiction, Waikato District Council (WDC) is a partner of Future Proof that has agreed on the future settlement pattern of the Sub-Region set out in both the Waikato Regional Policy Statement and the 2024 Future Proof Strategy.

**Waikato Regional Policy Statement and Future Proof**

2. Fonterra has submitted a private plan change seeking to rezone 91 ha of land surrounding its Te Rapa dairy manufacturing site, currently zoned "deferred industrial" to "Te Rapa North Industrial Zone". The proposed land area is identified in the 2024 Future Proof Strategy and Waikato Regional Policy Statement for development in the long term. Given the proposal's timing being brought forward, it is considered as an out-of-sequence development and is subject to a range of considerations, which are identified in the Waikato Regional Policy statement Appendix 11: Development Principles and Appendix 13: Responsive Planning Criteria - Out-of-sequence and Unanticipated Developments (Future Proof local authorities) or Future Proof Strategy Out-of-sequence and Unanticipated developments Criteria A in the 2024 Future Proof Strategy.
3. Out-of-sequence developments raise concerns around serviceability - the ability to service the out-of-sequence development without precluding existing or planned work within the area. This is considered below under the infrastructure-related sections.
4. Other considerations include its alignment with the overall growth direction of the sub-region as set out in the Future Proof Strategy 2024. The Future Proof Strategy identifies key locations for future growth, referred to as urban enablement areas. Over time, it is intended that most residential and industrial/business growth will occur within the identified future urban enablement areas. Te Rapa North is located within an identified urban enablement area and is also a strategic industrial node within the sub-region. The proposed Plan Change 17 thus aligns with the intended strategic outcomes of the area.
5. This Future Proof strategic direction aligns with the policy guidelines set out by the Waikato Regional Policy Statement, particularly UFD-P11: Adopting the Future Proof land use pattern. Accordingly, it is anticipated that there will be limited to no misalignments between PC17 and its considerations under the Future Proof Strategy. Additionally, UFD-P2: Coordinating growth and infrastructure indicates the need for the management of the built environment, ensuring that infrastructure is developed efficiently and appropriately. It is anticipated that through detailed planning and information availability, infrastructure provision can be managed adequately, as noted in the infrastructure sections below.

**Waikato District Growth and Economic Development Strategy (Waikato 2070)**

6. The proposal is located outside the geographic area Waikato 2070 relates to; however, given its proximity to Horotiu (an employment growth node identified within Waikato 2070), it is important to consider the implications PC 17 may have on WDC. Within the context of Waikato 2070, it is anticipated that the expected growth from the proposed PC 17 will not have a negative effect on Horotiu's development but rather complement the sub-regional industrial growth. Any issues that could arise around serviceability are considered under the Water and Transportation section.

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*Clause 6 of Schedule 1, Resource Management Act 1991*

### Stormwater / Integrated Catchment Plan

7. The infrastructure report prepared by Harrison & Grierson does not address how stormwater volume will be mitigated to reduce downstream effects on the Horotiu Stream. The Te Rapa North Integrated Catchment Management Plan (ICMP) developed (under consultation) by Hamilton City Council (HCC) proposes a relief pipeline to divert higher stormwater flows directly to the Waikato River. This was slightly favored over significant stream armoring and land acquisition at the downstream. This plan change should be considered and align with the recommendations of the Te Rapa North ICMP to ensure integrated and effective stormwater management across the catchment.
8. WDC request that stormwater designs at the subdivision consent stage are provided to WDC for review.
9. If WDC consider that the Stormwater designs submitted at the subdivision consent stage may have an adverse effect on the downstream stream system and/or Waikato River discharge (within the WDC district), WDC will request that design changes are made by the developer to mitigate those effects and/or make financial contributions to WDC to mitigate those effects.

### Wastewater

10. Northern Metro Detail Business Case future plans for Wastewater at Taupiri, Ngaruawahia, Horotiu, and Te Kowhai to be pumped to Pukete wastewater treatment plant interceptor. This plan change should consider opportunities for receiving these future flows at the "Terminal Wastewater Pumpstation" or upstream gravity network. However, it should also be acknowledged that the interceptor has not yet been planned. Concept design, land purchase, mitigation, consultation and funding still need to be completed. On this basis, traditional gravity main and rising main back to Te Rapa or Horotiu should be explored to enable servicing.

### Transportation / Roading Network

11. An Integrated Transport Assessment (ITA) dated December 2024 has been provided with the Private Plan Change 17 – Te Rapa North consultation documentation. The ITA includes modelling outputs from the Waikato Regional Transportation Model which the Waikato District Council also relies on. Outputs from modelling in Sidra have been included in the ITA which are considered industry practice.
12. From a Transport perspective, Waikato District Council has no issues with the proposed plan change, as establishing additional areas of industrial land at a time when industrial land is in short supply will likely result in shorter journeys from residential areas to employment

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precincts. Furthermore, the proposed industrial area abuts cross-boundary with Waikato District Council's industrial zone in Horotiu, (refer Waikato District Council's "Waikato 2070" document) which is under development in the north-west sector which could present synergies.

13. The provision to construct an East – West Road to suitable standard to allow for a Northern River Crossing (NRC) is supported as the proposed future NRC will facilitate further connectivity between Waikato District and Hamilton City.
14. The consideration for pedestrian and cycling facilities is supported. Improving and expanding connectivity for pedestrian, cycling and micromobility modes between the proposed area and the Te Awa Lakes development and further northwards into Waikato District Council's growing residential zones can assist in enhancing connectivity for these modes of transport for our residents.
15. Installation of proposed traffic signals at intersections are supported as it will make it easier for vulnerable road users /pedestrians.
16. The report states that "...PC 17 increases feasibility of public transport...". This is supported as there are existing bus services between Hamilton and the Waikato District. The patronage includes those going to work, students, and travelling for medical and other services. It will be in the Waikato District's interest that the bus service remains efficient in terms of travel times and efforts to maintain or reduce travel times in the face of increasing traffic, intersection controls, etc., using facilities such as bus-friendly lanes and reducing public transport impediments are encouraged.
17. The consideration for stormwater management on the western side of the proposed development using on site retention is supported and future detailed design may identify further necessary mitigations. This point is included in this submission as the drainage on the western side connects drainage paths into Waikato District Council area. A number of Waikato road culverts/bridges carry the stormwater to discharge northwards of the proposed development area. These roads include:
  - Innovation Way 1200mm Dia culvert which is 11 years old at 103m, 1200mm culvert at 152m
  - Great South Road 2m height culvert with a 3 sqm waterway area which is 45 years old at 13652m,
  - Armco culvert across Horotiu Road with 2 m clearance and a 4 sqm waterway area is 30 years old.
  - Washer Road 3.0m square box culvert with 9m sq area which is 11 years old.

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18. There are inundation areas north of Washer Road. The extent and frequency of inundation effects, from the proposed development, may be a concern for stakeholders especially with extreme events becoming more frequent from effects of climate change.
19. Considering that already zoned areas in the adjacent Waikato District Council area may upon development in the future rely on using existing watercourses with higher runoff coefficients than now, this may test the discharge capacity of the channels and culverts. It is for this reason we are commenting specifically on this in this submission.
20. The consideration for rail is supported. A number of Waikato District towns are located along the North Island Main Trunk (NIMT), connecting the district with Hamilton and further south. The future will likely see rail being used more for freight and passenger transport. Such a shift could enable the reduction of road wear and congestion. Planning efforts where such a future is protected and enhanced from connectivity, efficiency and safety perspective are supported.

### Ecological Values and Effects (terrestrial and freshwater)

21. The area is currently used for pastoral agriculture and largely a result of historical deforestation and agricultural practices, leading to a highly modified landscape with degraded watercourses and mostly exotic vegetation. The ecological report identifies a few remaining ecological values including the Waikato River and some Significant Natural Areas (SNAs). Additionally, at-risk fish species include longfin eel, giant kookopu, and potentially iinanga and black mudfish, and several small, low-value wetlands.
22. Key ecological considerations should focus on enhancing connectivity, restoring ecological functions, preserving hydrology, and creating buffers around ecological features, particularly along streams and wetlands. The two SNAs identified in the Plan Change 17 area contain large amounts of exotic vegetation that could be removed and replanted with native species. Given the proximity to the Waikato River these areas offer a good buffer and opportunity for enhancement.
23. Any proposed industrial development will significantly increase the area of impervious surfaces (buildings, roads, carparks). This will lead to increased volume and velocity of stormwater runoff, potentially carrying pollutants (heavy metals, hydrocarbons, sediments) into the streams and the Waikato River. It is recommended that the SNAs, wetlands and watercourses are enhanced to buffer these potential impacts, including the following:
  - Generous Riparian setback and plantings with dense multi-tiered native plantings which is managed in perpetuity
  - Extensive and well-designed stormwater management systems incorporating existing wetlands and watercourses with added features like constructed wetlands or rain gardens to treat runoff before it enters them.

- Fish passage solutions should incorporate fish-friendly designs for culverts and bridges (comply with the National Environmental Standards – Freshwater).

24. If unavoidable adverse effects on ecological values occur, consider that appropriate ecological offsets can be secured to current or greater ecological value, ideally within the local catchment.

**WDC seek the following decision from the local authority:**

From the above submission points, related to planning direction, stormwater/integrated network plan, wastewater, transportation/roading, and the ecological value and effects, overall WDC support the Private Plan change, if the following considerations are managed:

- WDC requests that stormwater designs, including but not limited to constructed wetlands, ponds and swales, and rain gardens at the subdivision consent stage, are provided to WDC for review.

**I wish to be heard in support of my submission.**

**If others make a similar submission, I will consider presenting a joint case with them at a hearing.**

**Signature of submitter:**



**Will Gauntlett**

**General Manager – Strategy and Growth**

**WAIKATO DISTRICT COUNCIL**

**Date:**

21/05/20025