

29 October 2025

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Plan Change 17 – Te Rapa North Industrial Hearing Panel
Hamilton City Council

Attn: Hearing Administrator
Email: planchange@hcc.govt.nz

Dear Vanessa Hamm (Chairperson),

Waikato Regional Council Submission to Proposed Private Plan Change 17 – Te Rapa North Industrial to the Operative Hamilton City District Plan

I request that this letter is tabled at the hearing for Proposed Private Plan Change 17 (PC17) on 2-4 December 2025 confirming Waikato Regional Council's (WRC's) position on the recommendations presented in the Section 42A Hearing Report.

WRC made a submission (submission 13) on PC17. The submission supported the proposed "live zoning" of the plan change area by removing the Deferred Industrial Zone overlay within the district plan, but sought further assessment in relation to some aspects and specific amendments to proposed provisions.

WRC staff acknowledge the position of the section 42A officer that further information is needed before a final recommendation is provided on the plan change, particularly in relation to transport, water, wastewater and stormwater. We agree it is important that infrastructure and servicing effects are properly assessed and that the plan change provides clear staging direction and triggers to ensure that urban development and infrastructure provision occur in a well-integrated, coordinated manner. This is necessary to give effect to Objective UFD-O1 and Policies UFD-P1 and P2 of the Waikato Regional Policy Statement (WRPS).

WRC staff generally support the recommendations set out in the section 42A report and consider that these satisfy most of WRC's submission points and align with the WRPS. WRC staff's position on specific recommendations within the section 42A report are listed below. Where relevant, we also detail our position on responses within the evidence on behalf of Fonterra.

- a) We support the recommended amendments to Policy 12.2.1b and c within the section 42A report, in accordance with the WRC submission. These better align with existing policy direction within the Operative District Plan, WRPS and Proposed WRPS Change 1 (National Policy Statement on Urban Development 2020 and Future Proof Strategy Update) - Decisions version, in relation to maintaining industrial land for industrial uses and protecting the commercial centres hierarchy.
- b) We support the recommended amendments to Rules 12.5.2a and 12.5.3 within the section 42A report, in accordance with the WRC submission. These better give effect to Policy UFD-P13 of the WRPS in relation to protecting the commercial centres hierarchy.

- c) We support the recommendation that provisions requiring the preparation of an Infrastructure Plan for three waters should be reintroduced to the plan change, to address alignment of the proposed development with wastewater and water supply capacity and ensure that stormwater is appropriately managed.

We note that Mr Grala, in his evidence on behalf of Fonterra recommends that Infrastructure Plan requirements be reintroduced through a new Rule 3.9.3.4b; we support this approach. In relation to stormwater management and erosion susceptibility in the Te Rapa Stream, we support the requirement within clause v. of Rule 3.9.3.4b that the Infrastructure Plan must demonstrate how it is consistent with the Te Rapa Integrated Catchment Management Plan and the requirement under clause vii. to include evidence of consultation with WRC and other relevant stakeholders and how feedback from these organisations has been addressed.

- d) We support the recommendation that HCC take over management of the land drainage scheme within the plan change area at the appropriate time, in accordance with the WRC submission. We note the recommendation within the section 42A report that this aspect could be dealt with as part of a reintroduced Infrastructure Plan requirement. We suggest this could be addressed as part of the consultation required with WRC under Rule 3.9.3.4b.vii. recommended by Mr Grala.
- e) We support the recommendation that a new policy be added in relation to adverse effects on indigenous fauna and their habitats, including long-tailed bats, in accordance with the WRC submission.

We note the section 42A report does not provided recommended wording for such a policy, however, Mr Grala on behalf of Fonterra recommends the introduction of two new policies (Policies 12.2.5f and 12.2.5g) in response to this submission point, which we support. Including these policies would create a better linkage between the proposed rules and the outcome sought by proposed Objective 12.2.5.

- f) We support the recommended amendments to Rules 25.2.5.4a.ii.A.1 and 1.2.2.30a.iii. to refer to the latest version of the Department of Conservation 'Protocols for Minimising the Risk of Felling Bat Roosts', in accordance with the WRC submission.

Please note that should the section 42A officer or technical experts for Hamilton City Council change their position or recommendations on the above, WRC's position outlined in this letter may be subject to change.

Should you have any queries regarding the content of this letter please contact Katrina Andrews – Senior Policy Advisor, Strategic and Spatial Planning on (07) 8590 929 or by email Katrina.Andrews@waikatoregion.govt.nz

Yours sincerely,

Lisette Balsom

Lisette Balsom
Manager, Strategic Policy Implementation