

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

**STATEMENT OF EVIDENCE 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 and relevant experience are set out below.
- 1.2 I am a Full Member of the New Zealand Planning Institute. I have a Masters in Resource and Environmental Planning (Hons) from Massey University, and a Bachelor of Arts from Canterbury University. I have 13 years' experience working as a planning in New Zealand and Australia for private and public clients.
- 1.3 As part of the wide and varied range of plan changes that I have been involved with, my key relevant experience includes: RMA policy development and implementation, drafting and implementation central government national direction instruments, district and regional plan reviews; preparation of private plan changes, strategic spatial planning and the preparation of resource consents.
- 1.4 I confirm that the issues addressed in this statement of evidence are within my area of expertise.

Code of conduct

- 1.5 I have read the Environment Court Code of Conduct for expert witnesses contained in the Environment Court Practice Note 2023 and agree to comply with it. I confirm that the opinions expressed in this statement are within my area of expertise except where I state that I have relied on the evidence of other persons. I have not omitted to consider any material fact known to me that might alter or detract from the opinions I have expressed.

2. SCOPE OF EVIDENCE

- 2.1 This evidence is provided on behalf of the following submitters (referred to herein as **'the Submitters'**):

- (a) Sam and Alisa Coleman (Submitter 4);
- (b) Scott Mathieson (Submitter 5);
- (c) Graeme Boddy (Submitter 8);
- (d) Hayden Porter (Submitter 9);
- (e) Paul and Gloria Stone (Submitter 12);
- (f) Wen Sen SHIH & Hsiu-Jung Huang (Paul & Gloria) (Submitter 17).

- 2.2 This evidence relates to the spatial extent of structure planning and live zoning that is proposed under Plan Change 17 – Te Rapa North Industrial Private Plan Change (**'PPC17'**)

- 2.3 My evidence will address the following:

- (a) The scope of proposed PPC17; and
- (b) The most appropriate approach to structure planning and live zoning land within the TRNIZ.

- 2.4 I have also prepared a separate brief of evidence on behalf of Empire Corporation and Porter Group (Submitter 7). My views on the scope of PPC17 and wider structure planning considerations set out below are consistent with what is set out in that brief of evidence.

3. EXECUTIVE SUMMARY

- 3.1 The Submitters made submissions to PPC17 seeking that PPC17 address the Te Rapa North Industrial Zone ('**TRNIZ**') comprehensively and live zone the entire Deferred Industrial Zone. In my view, the submissions directly relates to the changes proposed by PPC17 to the planning framework. The submissions satisfy the established two-limb legal test for determining whether a submission is "on" a plan change.
- 3.2 I consider that a comprehensive structure plan covering the entire TRNIZ would improve environmental, economic, and social benefits and be an efficient and effective means of achieving the relevant objectives. In my opinion PPC17 in its current form represents a piecemeal approach to structure planning that is inconsistent with best practice and with the objectives of both the Operative District Plan and the Waikato Regional Policy Statement ('**RPS**').

4. SCOPE OF PROPOSED PLAN CHANGE 17

- 4.1 The Submitters' submissions on PPC17 broadly sought the relief that PPC17 should address the TRNIZ comprehensively and relate to land which is located outside of the notified PPC17 area but within the TRINZ.
- 4.2 The Joint Memorandum of Counsel on behalf of Hamilton City Council and Fonterra Limited, and Direction #1 issued by the Independent Hearing Panel, raises a question as to whether the Submission is 'on' PPC17 and therefore whether there is jurisdiction for the Hearings Panel to consider and potentially grant the relief sought in the Submission.
- 4.3 The principles and tests for whether a submission or relief sought are 'on' a place change have been well established. I address below the planning principles and factual matters which underpin the legal tests in the specific circumstances of this case.
- 4.4 The established two-limb test is whether:
- (a) the submissions address the change to the status quo advanced by the proposed plan change. In other words, the submission must relate to the plan change itself; and

- (b) there is a real risk that persons potentially affected by such a change would be denied an effective opportunity to participate in the plan change process.¹

4.5 With respect to the first limb of the test in (a) above, concerning whether the Submission relates to the matters addressed in PPC17:

- (a) PPC17 proposes amendments to the Hamilton City Operative District Plan ('**ODP**') to live zone one part of the TRNIZ and proposes to introduce the Te Rapa North Industrial Structure Plan ('**the Structure Plan**') to guide development of the plan change area.
- (b) The Submissions relate to land that sits within the TRNIZ and immediately adjoins the PPC17 area. The effects of a zoning proposal are not generally limited to the land and activities located within the area covered by the plan change. They typically extend beyond the plan change area to adjacent landholdings and activities. The Structure Plan that has been prepared for the PPC17 area has the potential to create effects at the interface with surrounding landholdings. Such effects are anticipated to arise from the location of structuring elements identified in the Structure Plan and the way in which they extend into adjoining land, for example riparian and stormwater reserves or key transport connections.
- (c) The Submissions seek that PPC17 address the TRNIZ in a comprehensive and cohesive manner to ensure the potential effects of enabling urban industrial development can be managed in an integrated way. In this respect, the relief directly relates to the proposed Plan Change itself and the changes to the status quo advanced by PPC17, which propose the live zoning of parts of the TRINZ.
- (d) With respect to the objectives proposed under PPC17, the Submissions generally support the urbanisation of land within the TRNIZ. However, they raised concerns that a sufficiently detailed section 32 evaluation has not been undertaken with respect to the option of live zoning the entire TRNIZ² to achieve the relevant objectives. The Submissions therefore do not seek to significantly alter or add to the key objectives of PPC17. Rather, they identify that

¹ Established in *Clearwater Resort Limited v Christchurch City Council* AP34/02, 14 March 2003.

² Identified as Option 4 within the PPC17 section 32 evaluation.

an alternative method would be more efficient and effective in achieving those objectives. In my view, given the option of live zoning the entire TRNIZ was identified as a reasonably practicable option in the PPC17 section 32 evaluation, the relief sought is within scope and a matter that the PPC17 section 32 analysis could be reasonably expected to address in accordance with the requirements of section 32. Notably, the s32 report did address that option, but in my opinion (for the reasons explained further below) did not assess it sufficiently to meet the requirements of section 32.

- (e) For the above reasons, I consider that the relief sought by the Submitters directly relate to the notified Plan Change and the changes to the status quo advanced by PPC17. Accordingly, I consider that the issues raised can be considered to be within the scope of PPC17, based on my understanding of the relevant legal tests.

4.6 With respect to the second limb of the test in (b) above, relating to whether potentially affected parties may have missed an opportunity to participate, I consider the following to be relevant:

- (a) PPC17 seeks amendments to the TRINZ area, which is a spatially defined and discrete area that affects a limited number of land owners.
- (b) The Submissions seek that the entire TRNIZ area be live zoned for industrial purposes. In my view, the relief sought is not unusual and can reasonably be anticipated to be advanced by a landowner within the current statutory planning framework, particularly when a private plan change seeks to “spot zone” part of a wider deferred zoning such as proposed under PPC17.
- (c) This is reflected in the fact that numerous submitters sought similar relief to live zone all deferred land within the TRNIZ.
- (d) The summary of primary submissions made on PPC17 was notified on 24 June 2025. All submissions in full were also made publicly available via the Hamilton City Council website. The further submissions process provides for people to support or oppose the view expressed in the primary submission.
- (e) Given that people who would be affected by the plan change if modified as requested are already participating in the PPC17

process, I therefore consider that there is no real risk that persons potentially affected by the Submission (if the relief sought is granted) would have been denied an effective opportunity to participate in the plan change process.

- 4.7 For the reasons identified above, I consider that the Submission can properly be considered to be 'on' PPC17 and therefore the relief sought is within scope and able to be assessed on its merits by the Hearings Panel.

5. STRUCTURE PLANNING AND LIVE ZONING LAND WITHIN THE TRNIZ

- 5.1 This section of my evidence addresses the planning matters raised in the Submissions and responds to the relevant assessments contained within the section 42A Report.
- 5.2 The Submissions seek the deletion of the Deferred Industrial Zone Overlay from the entirety of the TRNIZ, as well as consequential amendments to the Structure Plan and chapters of the District Plan.
- 5.3 The analysis contained at paragraph 5.8 of the Section 42A Report does not recommend any changes to PPC17 in response to submissions which sought to expand the TRNIZ live zoning.
- 5.4 I consider that amendments are required to live zone and structure plan the entire TRNIZ in order to appropriately manage potential effects of urbanisation and to ensure an efficient and effective planning framework.
- 5.5 In considering the relief sought by the Submitters, I agree with the section 42A Report that a key consideration is whether the staged uplift of the TRINZ under PPC17 gives rise to adverse effects that are either not appropriate and/or not able to be managed. I consider that PPC17 in its current form does not include a sufficient level of detail and that the current proposal is likely to create adverse environmental effects.
- 5.6 In addition, I consider the obligations under section 32 of the RMA, as they apply to making changes to the District Plan, to be of particular relevance.
- 5.7 I address these matters below.

Effects of Private Plan Change 17

- 5.8 Structure planning is a well-established tool for managing urban growth in greenfield areas and guiding urbanisation and rezoning. It provides a

framework to establish the spatial pattern of land use, open space and transport networks, and infrastructure within a future development area. Through the structure planning process, wider strategic outcomes can be identified and achieved while ensuring environmental effects can be appropriately managed. Within greenfield areas, structure plans can also set out the methods in which urban edges or zoning interfaces and transitions are managed.

- 5.9 In my view, best practice structure planning requires a comprehensive and integrated evidence-based approach, undertaken across the whole of a development area, or at least sub-area that can be logically separated. An integrated approach is necessary to identify and manage development outcomes across the deferred area and ensure that cumulative effects of urbanising the TRNIZ can be appropriately identified and managed. That approach has been undertaken for the six structure plans currently incorporated under Appendix 2 of the ODP, which cover significant spatial areas as illustrated in **Figure 2** below.

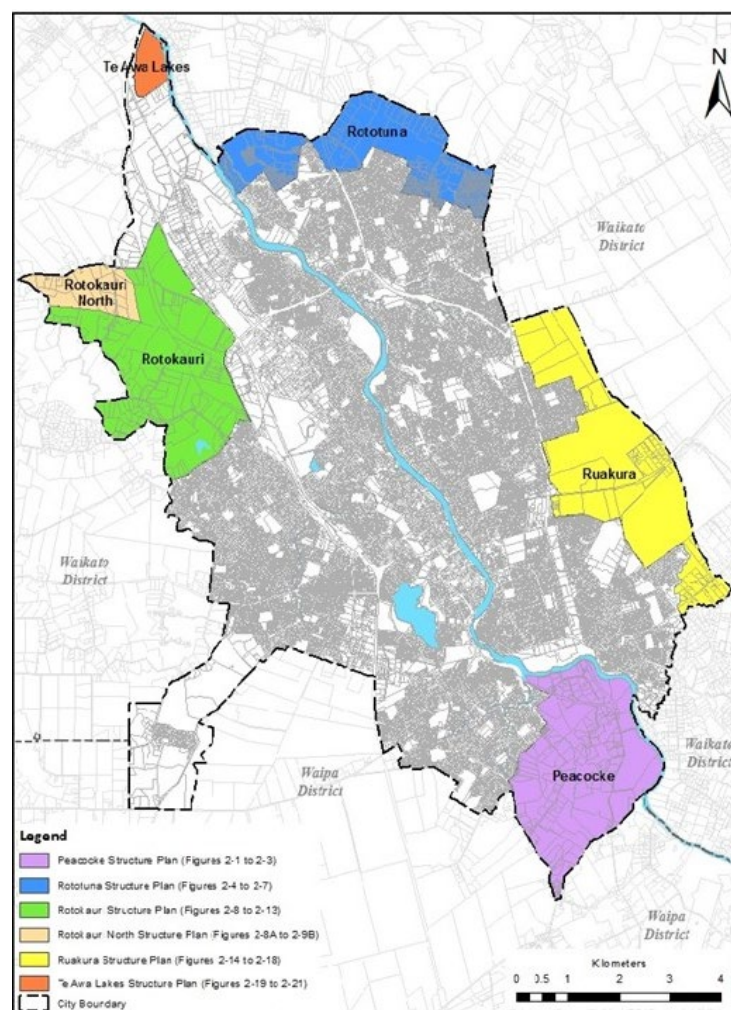


Figure 1: Structure Plans Locality Guide under Appendix 2 of the ODP, showing the spatial extent of existing structure plan areas.

- 5.10 This approach to structure planning is also reinforced under Objectives UFD-O1 of the Waikato Regional Policy Statement ('RPS') and the Chapter 3 objectives of the ODP, including in particular Objectives 3.3.2, 3.3.3, and 3.3.4,
- 5.11 As outlined above, PPC17 proposes to live zone a discrete industrial landholding within the centre of the TRNIZ that is surrounded by deferred land. The PPC17 area is defined by ownership boundaries rather than by a logical or defensible spatial boundary. In my experience, best practice structure planning would define these boundaries with reference to zoning patterns, transport corridors, natural features, or infrastructure servicing catchments. Except for its north-western edge adjoining the State Highway network, the PPC17 site is bound in all directions by land that remains under the Deferred Industrial Zone Overlay. In my view, this creates the risk of an ad-hoc and fragmented development pattern that can undermine the delivery of strategic integrated development outcomes for the TRNIZ, leaving uncertainty with respect to how land use, open space provision, and transport and infrastructure networks will be planned and will function across the TRNIZ.
- 5.12 In terms of managing zoning interfaces between the TRNIZ and surrounding area, the PPC17 Structure Plan identifies temporary interface landscape buffers at the periphery of the PPC17 area. In my view, this is not an efficient or effective method of achieving Objectives 3.3.1, 3.3.4, 12.2.1, and 12.2.3. I anticipate that the temporary interfaces will create uncertainty for adjoining land users and their placement has not been informed by the ultimate urban form of the TRNIZ and its relationship with adjoining sensitive uses. I consider that a more robust approach would be to use the structure planning process to identify necessary interface controls at the adjoining zoning interfaces with the Business 6 Zone and the Sports and Recreation Open Space Zone. These controls should be informed by the form of development that would be enabled within the TRNIZ, including but not limited to the PPC17 area. This can only be determined by structure planning the entire TRNIZ. A cohesive approach would ensure that the need to manage development effects at zoning interfaces, whether this is through landscape buffers or other mitigation measures, can be accurately identified within necessary locations and directly linked to the developments that would generate potential effects. This would also provide greater certainty to all landowners within the TRNIZ.
- 5.13 For these reasons, I consider that PPC17 and the Structure Plan approach in their current form has the potential to create adverse effects with respect to the

integrated planning and delivery of the development within the TRNIZ. In my view, the current proposal is not an efficient or effective method to achieve the relevant objectives ODP identified above or Objective UFD-O1 under the RPS.

- 5.14 In particular, PPC17 is likely to create implications for the other landowners within the TRNIZ who may wish to advance their own development or plan change applications. The incomplete information supporting PPC17 in relation to the interface with and strategic transport connections affecting surrounding TRINZ land may leave uncertainties regarding infrastructure provision. It can also transfer critical servicing considerations onto neighbouring landowners and constrain the ability of these landowners to progress with development in an integrated and coordinated way. For these reasons, I am of the view that the more limited Structure Plan approach currently proposed under PPC17 has the potential to hinder wider development outside of the plan change area.

Section 32 Evaluation

- 5.15 Section 32 of the Act sets out the evaluation requirements that apply when a Council is proposing to change the District Plan (whether through a Council led or private plan change proposal). Of particular relevance to the consideration of PPC17 are the requirements to evaluate:
- (a) The efficiency and effectiveness of reasonably practicable options in accordance with section 32(1)(b)(ii); and
 - (b) The costs and benefits of the environmental, economic, social, and cultural effects that are anticipated from the implementation of provisions under reasonably practicable options in accordance with section 32(2)(a).
- 5.16 The section 32 evaluation contained within PPC17 is generally limited to the proposed plan change area, and does not comprehensively assess the efficiency and effectiveness or costs and benefits associated with the identified options. In my view, this level of assessment is required under section 32 of the Act to correspond to the scale and significance of changes anticipated from the implementation of PPC17, particularly with respect to Option 4 identified in the section 32 evaluation to live zone the entirety of the TRNIZ.
- 5.17 Overall, I generally agree with the objectives proposed to be amended under PPC17 and included at Attachment 1 of Mr Grala's evidence, with the exception of Objective 12.2.3 which is proposed to be deleted under PPC17. I consider that notwithstanding the deletion of the Concept Development

Consent approach, Objective 12.2.3 remains relevant and an appropriate way to achieve the sustainable management purpose of the Act.

- 5.18 Objective 12.2.3 seeks to ensure development in the TRNIZ achieves the long-term land use pattern and occurs in an integrated, efficient, and co-ordinated manner. The objective is relevant to ensuring development gives effect to any structure plan for the TRNIZ and to ensure transport and infrastructure networks in particular can be integrated and co-ordinated across the area. This is of particular relevance due to the staged approach of development and given landholdings are held under different ownership. This will ensure that the effects of development on the built environment can be avoided or mitigated.
- 5.19 I therefore consider the following objectives are of particular relevance under section 32(6) when considering the appropriate spatial extent of the PPC17 area. All objectives, with the exception of Objective 12.2.3, are set out as they are proposed to be amended under PPC17:
- (a) Objective 3.3.1 (objective under the ODP) Optimised, long-term, positive environmental, economic, social and cultural effects of greenfield development;
 - (b) Objective 3.3.2 (objective under the ODP) New urban development is appropriately serviced and properly integrated to minimise City network impacts;
 - (c) Objective 3.3.3 (objective under the ODP) Effective and integrated management of Three Waters so as to sustainably manage the impact of development on the City's natural and physical resources;
 - (d) Objective 3.3.4 (objective under the ODP) An integrated and efficient pattern of land use and transportation so as to sustainably manage the impact of development on existing and planned transport infrastructure;
 - (e) Objective 12.2.1 (objective under the ODP) Industrial land uses are able to establish and operate within the zone in an efficient and effective manner;
 - (f) Objective 12.2.3 (objective under the ODP proposed to be deleted but I consider should remain) Industrial development is consistent with the long-term land use pattern for the Te Rapa North Industrial Zone and occurs in an integrated, efficient and co-ordinated manner; and

- (g) Objective 12.2.6 (new objective proposed under PPC17) Industrial development is integrated with the efficient provision of infrastructure.

- 5.20 An assessment in terms of section 32AA of the RMA is included at **Attachment 1** and evaluates spatial options for live zoned land within the TRNIZ, including Options 3 and 4 identified within the PPC17 section 32 evaluation.
- 5.21 Overall, I consider that the most efficient and effective option to achieve the objectives is to prepare a structure plan and live zone the entirety of the TRNIZ. It will ensure that land use, transportation, and three waters infrastructure can be strategically planned across the TRNIZ while also achieving improved environmental, economic, and social benefits in comparison to PPC17 in its current form.
- 5.22 A Structure Plan for the entire TRNIZ has not been prepared at this stage given the scale of technical work that would be required and an understanding that further technical work from Fonterra Limited will become available during the PPC17 hearing. I recommend that this this work is undertaken in a comprehensive manner to ensure PPC17 or any other future Plan Change to advance the live zoning of this land achieves the most efficient and effective outcomes for future development of the TRNIZ.

6. CONCLUSION

- 6.1 The Submissions to PPC17 are within the scope of the plan change to rezone Fonterra-owned land and neighbouring parcels within the Deferred Industrial Area in Te Rapa North.
- 6.2 Further amendments to PPC17 are necessary to ensure that PPC17 accords with the relevant planning and statutory framework, including in relation to the efficient and effective management of cumulative development and transportation and three waters infrastructure servicing effects, and achieves the evaluation requirements under section 32 of the RMA.
- 6.3 I consider that structure planning and live zoning the entire TRNIZ are the most efficient and effective provisions to achieve the relevant objectives of the plan change proposal advanced by Fonterra.

Briar Alayne Belgrave

30 October 2025

Attachment 1 – Section 32AA Evaluation

This assessment is provided in accordance with sections 32AA and 32 of the Resource Management Act 1991 ('RMA') with respect to the appropriate spatial extent of Plan Change 17 – Te Rapa North Industrial Private Plan Change ('PPC17') and within the Te Rapa North Industrial Zone ('TRNIZ'). The objectives of particular relevance are:

The objectives which have particular relevance to PPC17 are:

Strategic Planning and Integrated Development

- Objective 3.3.1 (objective under the ODP) Optimised, long-term, positive environmental, economic, social and cultural effects of greenfield development;
- Objective 12.2.1 (objective under the ODP) Industrial land uses are able to establish and operate within the zone in an efficient and effective manner; and
- Objective 12.2.3 (objective under the ODP proposed to be deleted but I consider should remain) Industrial development is consistent with the long-term land use pattern for the Te Rapa North Industrial Zone and occurs in an integrated, efficient and co-ordinated manner.

Infrastructure Servicing

- Objective 3.3.2 (objective under the ODP) New urban development is appropriately serviced and properly integrated to minimise City network impacts;
- Objective 3.3.3 (objective under the ODP) Effective and integrated management of Three Waters so as to sustainably manage the impact of development on the City's natural and physical resources; and
- Objective 3.3.4 (objective under the ODP) An integrated and efficient pattern of land use and transportation so as to sustainably manage the impact of development on existing and planned transport infrastructure;
- Objective 12.2.6 (new objective proposed under PPC17) Industrial development is integrated with the efficient provision of infrastructure.

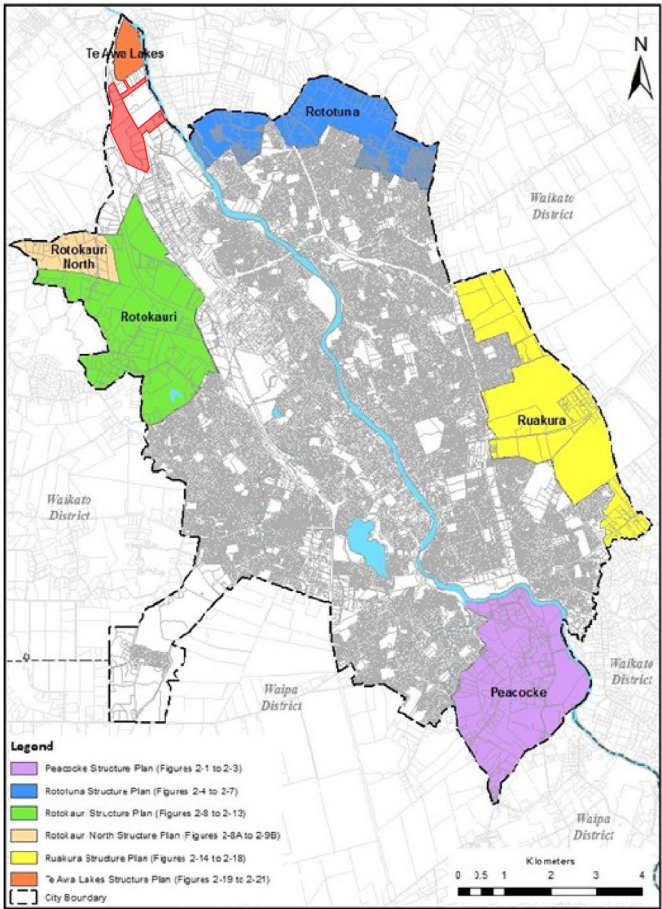
In determining the most appropriate provisions for achieving the objectives of the proposal, consideration has been given to the following other reasonably practicable options:

- Option 1: Proposed PC 17, which includes the preparation of a structure plan and live zoning the PPC17 area.
- Option 2: The preparation of a structure plan and live zoning the entire TRNIZ area.

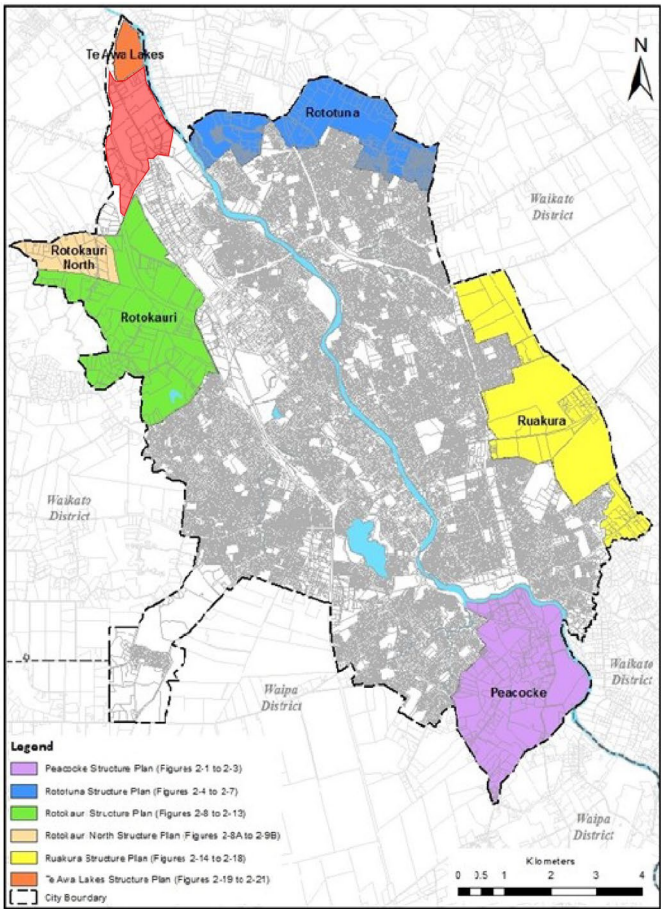
The table below evaluates these options against the requirements of section 32(1)(b).

Description of option for the Spatial Extent of PPC17

Option 1: Proposed PC17, including structure planning and live zoning the PC17 area, as shown in red below:



Option 2: Live zoning and structure planning for the entire TRNIZ area as shown in red below:



Benefits

Environmental

- The provisions proposed under PPC17 includes infrastructure triggers that will ensure development within the PPC17 area is integrated with infrastructure.
- Other development outcomes, including activities and the form of new buildings will occur in accordance with the provisions of the TRNIZ proposed under PPC17 and provisions under the ODP.

Cultural

- A Cultural Impact Assessment ('CIA') has been prepared to inform PPC17 and it is understood from the PC17 Private Plan Change Request Report prepared by Harrison Grierson that PPC17 is acceptable to mana whenua.

Economic

- Will not require significant additional costs to finalise the structure planning process.
- Will enable the development of land for industrial activities within the TRNIZ, though not to the same extent as Option 2.
- Will enable the live zoning of land at a lesser cost than Option 2.

Social

- Will provide development capacity for industrial activities within Hamilton City.

Environmental

- Will enable the TRNIZ to be structure planned in an integrated and cohesive way, enabling the co-ordination of land use and infrastructure deliver, maximising infrastructure design efficiencies, and providing guidance on land use outcomes, including to manage potential effects at the edge of the TRNIZ. This will ensure potential adverse effects of new industrial development can be appropriately addressed.
- Other development outcomes, including activities and the form of new buildings will occur in accordance with the provisions of the TRNIZ proposed under PPC17 and provisions under the ODP.

Cultural

- It is acknowledged that further engagement with mana whenua is required to identify cultural benefits under Option 2. However, it is anticipated that the benefits that can be achieved through the proposed PPC17 provisions will be carried over to the additional land.

Economic

- Will enable the greatest extent of development potential for industrial activities.
- Will enable infrastructure to be considered cohesively across the TRNIZ, creating efficiencies and avoiding duplication of physical works.

Social

- Will provide development capacity for industrial activities within Hamilton City.
- Will provide certainty to landowners and developers within the TRNIZ on development outcomes and key structuring elements that can be anticipated to be delivered as urbanisation occurs.

		<ul style="list-style-type: none"> Will ensure a fair and equitable allocation of infrastructure upgrade costs among landowners.
Costs	<p>Environmental</p> <ul style="list-style-type: none"> Without structure planning the entire TRNIZ or identifying all of the key structuring elements that have interdependencies within the TRNIZ, is uncertainty whether the potential cumulative adverse effects of development for new industrial activities have been adequately addressed. <p>Cultural</p> <ul style="list-style-type: none"> A Cultural Impact Assessment (‘CIA’) has been prepared to inform PPC17 and it is understood from the PC17 Private Plan Change Request Report prepared by Harrison Grierson that PPC17 is acceptable to mana whenua. <p>Economic</p> <ul style="list-style-type: none"> Creates potential for duplication and/or inefficiencies in the delivery of the infrastructure network. Creates temporary planning provisions such as landscaping requirements at the existing external boundaries of the PPC17 area which can be treated as ‘temporary’ under 3.9.2.9, resulting in potential inefficiencies in terms of implementation, compliance, and monitoring. <p>Social</p> <ul style="list-style-type: none"> By not identifying or implementing the most efficient development and infrastructure strategy, PPC17 has the potential to hinder wider development outside of the plan change area, and adversely affect other landowners. 	<p>Environmental</p> <ul style="list-style-type: none"> Development of new industrial activities and buildings within the TRNIZ has the potential to create adverse environmental effects, however be managed in accordance with provisions under the ODP and other bespoke provisions identified through a comprehensive Structure Planning process. <p>Cultural</p> <ul style="list-style-type: none"> It is acknowledged that further engagement with mana whenua is required to identify cultural costs under Option 2. However, it is anticipated that with respect to potential effects on cultural values, the land to be included will be managed consistently with the PPC17 area. <p>Economic</p> <ul style="list-style-type: none"> Will require the greatest upfront costs to complete structure planning for the entire TRNIZ. However, an integrated approach to structure planning will enable costs to be shared amongst those landowners wishing to participate. <p>Social</p> <ul style="list-style-type: none"> Landowners who are not the plan change applicant may feel less engaged with structure planning outcomes involving their land.
Efficiency and effectiveness in achieving the objectives	<p>Strategic Planning and Integrated Development</p> <ul style="list-style-type: none"> This option is less efficient and effective in achieving Objective 3.3.1. While PPC17 will enable long-term positive effects by providing for live zoning of the land for industrial activities, positive effects can be greater optimised under Option 2 through an integrated and coordinated approach to structure planning and the live zoning of a greater extent of land to meet demand for industrial land supply. This option is less efficient in achieving Objective 12.2.1. While industrial land uses will be enabled, the establishment of land use activities and overall land use pattern is less efficient when compared with the outcomes enabled by Option 2 as this option does not provide for the TRNIZ to be developed cohesively based on defensible spatial boundaries. This option is not efficient or effective in achieving Objective 12.2.3. The limited spatial extent of the structure plan area does not establish a framework to guide future development to ensure that land uses within the TRNIZ can occur in an integrated, efficient, and co-ordinated manner. <p>Infrastructure Servicing</p> <ul style="list-style-type: none"> This option is less efficient and effective in achieving Objectives 3.3.2 and 12.2.6. While development within the Structure Plan spatial extent can be serviced by infrastructure as development occurs, it is uncertain whether the infrastructure strategy is the most appropriate and whether it will enable an integrated approach across the TRNIZ as structure planning for the TRNIZ has not been undertaken. This option is less efficient and effective in achieving Objective 3.3.3, as while it will ensure development is suitably serviced by infrastructure, it leaves opportunities to further refine the three waters infrastructure strategy to achieve design and operational efficiencies. This option is less efficient or effective in achieving Objective 3.3.4. In comparison to Option 2, there is less certainty that the PPC17 Structure Plan will deliver an integrated and efficient pattern of land use and transportation within the TRNIZ. 	<p>Strategic Planning and Integrated Development</p> <ul style="list-style-type: none"> This option is the most efficient and effective in achieving Objectives 3.3.1 and 12.2.1. By undertaking a structure planning exercise for the TRNIZ area, this option will enable industrial land uses and deliver the greatest extent of positive environmental, economic, social and cultural effects. The Structure Plan will provide certainty with respect to the land use pattern, key structuring elements, and infrastructure servicing to ensure the TRNIZ are can be developed cohesively. This will support industrial activities operating efficiently and effectively in the long term. This option is efficient and effective in achieving Objective 12.2.3. Preparing a Structure Plan for the entire TRNIZ area will provide strategic direction for land use patterns and infrastructure servicing and staging. This will enable future development and land use to occur in an integrated, efficient and co-ordinated manner. <p>Infrastructure Servicing</p> <ul style="list-style-type: none"> This option is efficient and effective in achieving Objectives 3.3.2 and 12.2.6. Preparing a Structure Plan and identifying infrastructure triggers for the entire TRNIZ area will ensure that future urban development can be appropriately serviced and integrated with the provision of infrastructure as development occurs in stages. This option is the most efficient and effective in achieving Objectives 3.3.3 and 3.3.4. Structure planning for the entire TRNIZ area will enable the integrated management of three waters and transport infrastructure at a scale necessary enable infrastructure requirements, interdependencies and staging to be appropriately identified and subsequently implemented.
Summary	<p>Option 2 is preferred. The long-term benefits of integrated structure planning and infrastructure delivery and provision for the coordinated land use and development sequencing are considered to outweigh the upfront costs and added complexities with structure planning the entire TRINZ area. Although Option 2 may give rise to less formal engagement with landowners than a process which had involved their land being included at the outset, this does not preclude ongoing involvement and engagement in the implementation phase including through resource consent processes. There is likely to be a good awareness within the wider deferred TRNIZ regarding the potential for livezoning of the entire TRNIZ given that many submissions and further submissions sought or supported the relief sought set out the Submissions. A number of affected landowners are therefore already participating in the PPC17 process. In addition, the TRNIZ is subject to the Deferred Industrial Zone Overlay, and the outcome sought under Option 2 is not considered to be unusual or unanticipated under the current ODP Framework. Overall, Option 2 delivers a cohesive planning framework that gives effect to the integrated management outcomes which are broadly sought by the objectives.</p>	