

**From:** [info@waipadc.govt.nz](mailto:info@waipadc.govt.nz)  
**To:** [Policy Shared](#)  
**Subject:** External Sender: Waipā District Plan - Plan Change Submission Form 5 - Kama Trust  
**Date:** Rāmere, 19 Hōngongoi 2024 11:15:51 AM

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**Full name of submitter** Kama Trust

**Contact name (if different from above)**

**Email address**

**Address for service**

**Contact phone number**

**This is a submission on the following proposed plan change to the Waipā District Plan**

PLAN CHANGE 14 – REZONING PART OF C10 GROWTH CELL

**Could you gain an advantage in trade competition through this submission?** I could not

**Are you directly affected by an effect of the subject matter that - (a) adversely affects the environment; and (b) does not relate to trade competition or the effects of trade competition?** I am

**Do you wish to be heard (attend and speak at the Council hearing) in support of your submission?** I do

**If others make a similar submission, will you consider presenting a joint case with them at the hearing?** Yes

**Do you support the proposed change(s)?** I support in part

**The specific provisions of the plan change my submission relates to are (give details):**

Please refer to the Kama Trust submission document attached.

**My submission is**

Please refer to the Kama Trust submission document attached.

**I seek the following decision/s from Council**

Please refer to the Kama Trust submission document attached.

**Attachments**

[Kama Trust Submission on Proposed Plan Change 14.pdf](#) (167 kb)

## SUBMISSION ON PROPOSED PLAN CHANGE 14 – REZONING PART OF C10 GROWTH CELL

<b>To:</b>	<p>Proposed Plan Change 14 – Rezoning part of C10 Growth Cell</p> <p>Waipa District Council Private Bag 2402 Te Awamutu 3840</p> <p>Email: <a href="mailto:districtplan@waipadc.govt.nz">districtplan@waipadc.govt.nz</a></p>
<b>Submitter:</b>	Kama Trust
<b>Address for Service:</b>	<p>C/- [REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>P: [REDACTED]</p> <p>E: [REDACTED]</p>
<p>Kama Trust wishes to be heard in support of its submission.</p> <p>Kama Trust could not gain an advantage in trade competition through this submission. Kama Trust is directly affected by an effect of the subject matter that adversely affects the environment and does not relate to trade competition or the effects of trade competition.</p> <p>If others make a similar submission, Kama Trust would consider presenting a joint case with them at any hearing.</p>	

**INTRODUCTION**

1. Kama Trust welcomes the opportunity to submit on Proposed Plan Change 14 (**PC14**) to the Waipa District Plan.

**BACKGROUND**

2. Kama Trust owns approximately 15ha of industrial zoned land within the C9 Growth Cell.

**SCOPE OF SUBMISSION**

3. Kama Trust is interested in PC14 in its entirety.

**KAMA TRUST'S SUBMISSION**

4. Kama Trust conditionally supports PC14 but only if transport effects (both construction and operational) on the already constrained local network are properly mitigated. Unless these effects are properly mitigated it opposes PC14.
5. Kama Trust's conditional support for PC14 is subject to incorporating plan provisions which protect against adverse effects on the Kama Trust land within the C9 Growth Cell by ensuring:
  - a) Any potential adverse amenity effects on Kama Trust's land arising from PC14 are appropriately mitigated;
  - b) Any potential adverse effects on the transport network arising from PC14 are appropriately mitigated;
  - c) Any potential adverse stormwater effects arising from PC14, including downstream flooding, are appropriately mitigated; and
  - d) Appropriate staging provisions:
    - i. Which ensure that development is timed to occur when adequate infrastructure capacity is available to support the level of development that PC14 will enable; and
    - ii. Which control any risk of adverse economic effects from oversupply of industrial land in the market.

**REASONS FOR SUBMISSION**

6. Kama Trust is concerned about development being enabled under PC14:
  - a) When there are potential or known infrastructure capacity constraints; and
  - b) Which may give rise to adverse economic effects arising from oversupply of industrial-zoned land; and

- c) The impact that this could have on development already enabled within the C9 Growth Cell, including on the Kama Trust land.

### **Oversupply of industrial land**

7. The economic analysis completed by BCDA after Plan Change 17 showed that there is sufficient supply of industrial land in Cambridge in the medium-term. However, in the longer-term, it is anticipated that there will be insufficient supply of industrial land to meet expected demand. The C10 Growth Cell was included in the district plan for 2035. Currently there is at least 66ha of vacant industrial zoned land in the catchment. Enabling an additional 79ha of industrial-zoned land to be developed now in the C10 Growth Cell could have a significant impact on stakeholders in the C9 Growth Cell if the industrial land supply exceeds demand.
8. Kama Trust seeks appropriate staging provisions which control any risk of adverse economic effects arising from an oversupply of industrial zoned land.

### **Insufficient infrastructure capacity**

9. The Integrated Transport Assessment states that the roading network does not currently have capacity for PC14. That would require Victoria Road to be upgraded to a dual carriageway from the new Hautapu/Victoria/Hannon roundabout to the expressway. This upgrade is still some way from completion. PC14 could have a major impact on businesses and stakeholders in the C9 Growth Cell if the development enabled under PC14 is able to progress before this roading infrastructure upgrade has been completed.
10. Accordingly, Kama Trust seeks plan provisions which ensure that no construction or operational traffic within the C10 Growth Cell is enabled until the necessary transport network upgrades are in place.
11. The Civil Infrastructure Assessment states that the electricity network is currently operating near capacity and is not capable of supplying the C10 Growth Cell without network upgrades taking place. While it is anticipated that construction of a new substation will provide the capacity necessary under PC14, it is not programmed to be constructed until 2027 (once the new Forrest Road substation becomes operational, expected in 2025). Kama Trust is concerned about the impact on businesses and stakeholders in the C9 Growth Cell if development is enabled to occur under PC14 prior to the electricity network upgrades occurring.
12. Kama Trust seeks appropriate staging provisions to ensure that the necessary infrastructure is in place prior to any development enabled by PC14 commencing, and that this infrastructure has adequate capacity available to service that development.

### **Stormwater, Transport, Amenity effects**

13. Kama Trust is concerned about:

- a) The manner in which stormwater is proposed to be managed which could have adverse effects on land downstream, and may result in flooding;
  - b) Any adverse amenity effects on the Kama Trust land arising under PC14; and
  - c) Any adverse effects on the wider transport network arising under PC14.
14. Kama Trust seeks appropriate provisions to mitigate any adverse stormwater, transport and amenity effects arising under PC14.
15. Kama Trust seeks any such consequential relief necessary to give effect to this submission.

**DECISION SOUGHT**

16. Only approve PC14, subject to the above matters being satisfactorily addressed through specific plan provisions. Unless these issues are satisfactorily addressed, decline PC14.