

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of a hearing for Proposed Plan Change 14 –
Mangaone Precinct and C10 Industrial Growth Cell –
Hautapu to the Waipā District Plan

SUMMARY STATEMENT OF KATRINA ROSE ANDREWS

For the Waikato Regional Council

PLANNING

DATED 5 MARCH 2025

INTRODUCTION

1. My name is Katrina Rose Andrews. I am a Senior Policy Advisor in the Strategic and Spatial Planning Team at the Waikato Regional Council (WRC). My qualifications and experience are set out in my evidence in chief (EIC) dated 17 February 2025.
2. The purpose of this statement is to provide summary of my EIC for presentation at the hearing for Proposed Plan Change 14 – Mangaone Precinct and C10 Industrial Growth Cell – Hautapu (PC14).
3. I reconfirm the statement in my EIC that I have read and agree to comply with the Code of Conduct for Expert Witnesses as set out in the Environment Court Practice Note 2023.

SCOPE OF EVIDENCE

4. The WRC submission to PC14 supported development of the plan change site for industrial purposes as per the Future Proof Strategy, subject to further analysis and amendments, with a view to ensuring the proposed plan change aligns with the relevant higher-order policy direction under the Resource Management Act 1991 (RMA). This includes the Waikato Regional Policy Statement (WRPS) and Proposed Waikato Regional Policy Statement Change 1 – National Policy Statement on Urban Development 2020 and Future Proof Strategy Update (Proposed WRPS Change 1) – Decisions version.
5. I am supportive of most of the assessments and recommendations presented in the Section 42A Hearing Report for PC14 ('section 42A report') as they relate to the WRC submission.
6. My EIC briefly comments on the assessment of PC14 against the National Policy Statement for Highly Productive Land 2022 (NPS-HPL) and the Urban form and development (UFD) chapter of the WRPS and Proposed WRPS Change 1 – Decisions version, before focusing on a limited number of recommended amendments relating to long-tailed bats and their habitat, and transport emissions reduction.

NPS-HPL

7. In paragraph 19 of my EIC, I note that I agree with the assessment of the NPS-HPL presented in the section 42A report, which concludes that the PC14 land is exempt from the transitional definition of highly productive land under Clause 3.5(7)(b) of the NPS-HPL. This is due to the site being "identified for future urban development" as defined in the NPS-HPL, as it was identified in the Future Proof Strategy 2022 as being suitable for commencing urban development within 10 years from the commencement date of the NPS-HPL.
8. I note that the Market Economics peer review of the PC14 Economic Assessment agrees with some of the points raised in the WRC submission in relation to this assessment. However, as the plan change site does not meet the transitional definition of highly productive land, I agree that PC14 is exempt from the tests under Clause 3.6 of the NPS-HPL, which require detailed assessment of development capacity and sufficiency.

WRPS AND PROPOSED WRPS CHANGE 1 – DECISIONS VERSION

9. In paragraphs 21-25 of my EIC, I address the UFD chapter of the WRPS and Proposed WRPS Change 1 – Decisions version.
10. I highlight that a key aspect of the Proposed WRPS Change 1 – Decisions version assessment, is the assessment against Policy UFD-P11, Method UFD-M49 and APP13 (Responsive Planning Criteria), relating to out-of-sequence or unanticipated developments. PC14 represents an out-of-sequence development, as it proposes to bring forward the development of part of the C10 growth cell from the long-term to the medium-term.
11. Overall, I generally agree with the assessment of the UFD chapter of the WRPS and Proposed WRPS Change 1 – Decisions version presented in the section 42A report.

LONG-TAILED BATS AND THEIR HABITAT

12. The next section of my EIC relates to the management of actual and potential effects on long-tailed bats and their habitat. I begin (under paragraph 28) by briefly outlining the statutory context for PC14 in relation to bats and their habitat. This includes national and regional policy direction under the National Policy Statement for Indigenous Biodiversity 2023 and the Ecosystems and Indigenous Biodiversity (ECO) chapter of the WRPS.
13. I then turn (at paragraph 34) to address the section 42A report and recommended amendments to the plan change provisions.
14. I support all of the amendments recommended within the section 42A report in relation to the bats topic. In particular, I support the addition of new provisions S27.2.26 and S27.2.27 which provide a description of the High Value Bat Habitat Area identified on the structure plan and the purpose of associated provisions.
15. I also support the new Objective 7.3.9 and Policies 7.3.9.1 and 7.3.9.2, relating to long-tailed bat habitat values within the Mangaone Precinct. In my view, the addition of this objective and policies will achieve better alignment with the policy direction of the WRPS and assist with the assessment of future resource consent applications against the intended outcomes for the High Value Bat Habitat Area.
16. I then outline two further amendments that I consider are necessary in relation to management of effects of PC14 on long-tailed bats and their habitat.
17. These amendments relate to the provision of a 20m buffer around the High Value Bat Habitat Area, which is to be included as part of the Mangone Stream Reserve. This buffer area formed part of the advice provided by Bluewattle Ecology for PC14.¹

¹ Plan Change 14 Application Appendix D2 – Opinion on protection of long-tailed bats and their habitat: Plan Change 14 – Management of Bat Habitat, Bluewattle Ecology, 2 May 2024 - [ECM 11223898 v1 Appendix D2 - Bat Management Provisions](#)

18. As the 20m buffer is part of the package of provisions upon which the Bluewattle Ecology opinion is based, in my view, it is important that the width of this buffer is not reduced during future detailed design of the Mangaone Stream Reserve. However, currently, I consider there is a risk that this could occur, as the 20m buffer is not referenced on the structure plan or in the proposed plan provisions.
19. To address this, I recommend (in paragraphs 46 and 47 of my EIC):
- a. An amendment to new provision S27.2.26, which describes the High Value Bat Habitat Area, to also reference the 20m buffer around this area where industrial activities cannot occur; and
 - b. That an additional assessment criterion be added to Rule 21.2.7.1 (Information Requirements for the Mangaone Stream Reserve Development and Operational Management Plan), requiring assessment of the extent to which a 20m buffer has been provided around the High Value Bat Habitat Area to protect this area and the bat population within it from adverse effects of adjacent industrial activities.
20. I consider these amendments are necessary to ensure that adverse effects on long-tailed bats and their habitat are addressed as intended in the plan change application and as directed by the higher-order statutory and policy framework, including the WRPS.
21. I note that the legal submissions on behalf of Fonterra² state that Mr Ussher is comfortable with these amendments. The Director-General of Conservation is also supportive of the amendments.³

TRANSPORT AND CLIMATE CHANGE

22. Turning now to transport and climate change, the WRC submission noted that PC14 is generally consistent with the Waikato Regional Land Transport Plan and the WRPS as it pertains to transport matters, however the submission sought further assessment in relation to transport emissions reduction and that new provisions be added to address climate change and transport emissions in the context of the proposed industrial rezoning.
23. The section 42A report⁴ recommends that these submission points be rejected, stating that Waipā District Council staff conclude that while the district plan as a whole would benefit from such provisions, it is not appropriate for these to be specific to development within the Mangaone Precinct only.
24. Whilst I agree that these matters would ideally be addressed at a district-wide level, I note that PC14 must still give effect to the relevant national and regional statutory direction relating to climate change and transport emissions reduction. In paragraph 51 of my EIC, I highlight some of the pertinent statutory direction under the RMA, National Policy Statement

² Legal Submissions on behalf of Fonterra, paragraph 6.24 - [Court](#)

³ Department of Conservation letter, dated 26 February 2025 - [03. Director-General of Conservation - Statement of Evidence](#)

⁴ Section 42A report, paragraphs 4.13.11 – 4.13.14.

on Urban Development 2020, WRPS and Proposed WRPS Change 1– Decisions version relating to urban development, transport and climate change.

25. In relation to the section 42A response that it would not be appropriate to include transport provisions specific to development within the Mangaone Precinct only, I note that provisions relating to electric vehicle (EV) charging equipment were included for the Northern Precinct of the Airport Business Zone as part of decisions on Private Plan Change 20 – Airport Northern Precinct Extension to the Waipā District Plan (PC20). In my view, it would be appropriate to also include these provisions for the Mangaone Precinct.
26. In paragraph 54 of my EIC, I set out a new Permitted Activity rule, standard and assessment criteria for EV supply equipment that I recommend be added to PC14.
27. These are enabling provisions that would support the provision of EV charging facilities as part of development of the PC14 site. In my view, including these provisions in PC14 would result in the plan change better giving effect to the relevant national and regional statutory direction relating to climate change and transport emissions reduction.

CONCLUSION

28. In summary, I support the majority of the assessments and recommendations presented in the section 42A report for PC14. I recommend further specific amendments to provisions relating to the 20m buffer around the High Value Bat Habitat Area and provision of EV charging equipment, which I consider will result in the plan change better giving effect to the relevant higher-order policy direction.



Katrina Andrews
5 March 2025