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13 March 2023

Plan Change 17 – Hautapu Industrial Zones Hearings Panel
Waipā District Council

Attn: Hearing Administrator
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Dear Councillor St Pierre (Chair),

Waikato Regional Council Submission to Proposed Plan Change 17 – Hautapu Industrial Zones to the Operative Waipā District Plan

I request that this letter is tabled at the hearing for Proposed Plan Change 17 (PC17) on 29 March 2023, confirming Waikato Regional Council's (WRC) position on the recommendations presented in the Section 42A hearing report.

WRC did not lodge a submission to PC17, but made a further submission on 16 December 2022. The further submission responded to submission points relating to two topics: the definition of 'dry industry' and the associated policy and rules, and additional rezoning.

As the part of the Hautapu Landowners' Group submission requesting additional rezoning has since been determined by the Panel as outside the scope of PC17, only those points relating to dry industry remain a 'live' issue for the hearing.

WRC staff's position on the Section 42A report recommendations is as follows:

- We support the recommended amendment to Rule 7.4.1.1(a). This ensures the rule framework aligns with the relevant policies for industrial activities within the Hautapu Industrial Structure Plan area. We note that the revised rule framework does not specifically provide for dry industry activities, except under Rule 7.4.1.1(w).
- We support the recommendation to retain Policy 7.3.4.10 as notified. We agree that the notified wording should be retained to restrict and dissuade wet industry within the Hautapu Industrial Structure Plan area given the infrastructure constraints identified by Waipā District Council.
- We do not support the recommended amendment to the definition of 'dry industry'. The reasons for this are set out below. The notified definition of 'dry industry' should be retained.

'Dry industry' definition

As outlined in the further submission, WRC does not support ground disposal for process waste streams, particularly from operations such as concrete batching plants. To avoid contaminants infiltrating groundwater, industrial activities should ideally discharge to a trade waste system. Any discharges that are disposed to ground need to be treated prior; the ground should not be used as a water quality treatment device to remove contaminants.

The revised definition as recommended in the Section 42A report only mentions treatment of stormwater and only via soakage disposal. This definition could have the impact of encouraging more disposal of process water to ground soakage, which does not reflect best practice, and reads as implying that soakage disposal is an adequate primary treatment method for stormwater.

This does not address our concerns that discharge of either process water, or stormwater without prior treatment, may lead to groundwater contamination, which can then eventually migrate into nearby streams. Such impacts would not give effect to Te Ture Whaimana o Te Awa o Waikato (the Vision and Strategy for the Waikato River). Therefore, we consider the notified definition of 'dry industry' should be retained.

If the Panel were to consider revising the definition in line with the Section 42A report recommendation, we consider an amendment is needed to clarify that any stormwater disposed to ground soakage must be treated *prior* to soakage.

Please note that should the Section 42A author for Waipā District 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 – Policy Advisor, Strategic and Spatial Planning on (07) 859 0929 or by email Katrina.Andrews@waikatoregion.govt.nz.

Yours sincerely,



Lisette Balsom
Manager, Strategic Policy Implementation