

Send to: Waipā District Council, Private Bag 2402, Te Awamutu 3840

Phone: 0800 924 723 | Online: [www.waipadc.govt.nz/planchanges](http://www.waipadc.govt.nz/planchanges) | Email: [districtplan@waipadc.govt.nz](mailto:districtplan@waipadc.govt.nz)

Please attach additional sheets if there is not enough space for your submissions. If you do not wish to use this form, please ensure that the same information required by this form is covered in your submission.

## COUNCIL USE ONLY

Date received

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**Note:** You must fill in ALL sections of this form.

Submissions close 5pm Friday, 11 November 2022.

## 1. Submitter details

Full name of submitter:

AML Limited

Contact name if different from above:

Nicky Hogarth

Contact phone number(s)

Email address:

Address for service:

(required if no email address is provided)

We will serve all formal documents electronically via the email address provided above. Where there is no email address provided the documents will be posted to the above address.

## 2. This is a submission on the following proposed plan change to the Waipā District Plan

Proposed Plan Change 17 - Hautapu Industrial Zones

## 3. Trade competition

Select one

I could

I could not

gain an advantage in trade competition through this submission.

Select one

I am

I am not

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

## 4. Attendance at Council hearing

Select one

I do

I do not

wish to be heard (attend and speak at the Council hearing) in support of my submission

If others make a similar submission, I will consider presenting a joint case with them at the hearing.

Yes

No

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

Select one	<input type="radio"/>	I SUPPORT
	<input checked="" type="radio"/>	I SUPPORT IN PART
	<input type="radio"/>	I OPPOSE

6. My submission is: (please include the reasons for your view)

See Attached.

7. I seek the following decision/s from Council: (give precise details – e.g. what you would like the wording of a specific provision (or map) to be changed to)

See Attached

8. Signature of submitter (note: a signature is not required if you make your submission by electronic means, however please type your name below)

Signature of submitter: (or person authorised to sign on behalf of submitter)		Dated 3/11/22
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**Submission on  
Plan Change 17  
Waipa District Plan**

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**To:** Waipa District Council

**Name of submitter:** AML Limited trading as Allied Concrete

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## **INTRODUCTION**

1. This is a submission on the Proposed Waipa District Plan Change 17
2. The submitter could not gain an advantage in trade competition through this submission.
3. AML Limited is part of the HW Richardson Group of companies and a joint venture between Holcim (New Zealand) Ltd and Allied Concrete Ltd – now operating as the brand Allied Concrete (Allied). Allied Concrete is one of New Zealand's largest concrete suppliers with a modern fleet of nearly 400 trucks and more than 50 plants, Allied Concrete supply all sectors of the New Zealand construction industry, from residential through to large scale commercial and infrastructure projects.
4. Allied currently operates a concrete batching plant at 166 Queen Street, Cambridge in an area known as Carters Flat. The Waipa District Council are currently in the process of undertaking consultation for Plan Change 19 (PC19) which is intended to incentivise the relocation of industrial activities from Carters Flat where Allied are currently located to allow it to be converted to a "Commercial/Business hub". WDC through (PC19) envisage that Industrial activities from this area of Cambridge are relocated to the Hautapu Industrial Area.

### **Relief**

5. Allied's relief and the reasons for it are outlined in table 1 below.

**RELIEF SOUGHT**

**Table 1: Relief Sought**

#	Proposed Plan Change 17	Support Oppose	Relief Sought	Reasons
<b>PART B - DEFINITIONS</b>				
1.	<p>Dry Industry</p> <p>Means any industrial operation that does not use water for processing, manufacturing or production purposes; and does not discharge nor generate any liquid effluent from its operations.</p>	Amendments proposed	<p>Amend the definition of Dry Industry to the following:</p> <p><i>"Means any industrial operation that does not use water for processing, manufacturing, or production purposes; and does not discharge nor generate any liquid effluent from its operation.</i></p> <p><i>Includes any industrial operation that uses and/or disposes of water from processing, manufacturing and production but is self-contained on site and does not require the use of council water infrastructure."</i></p>	<p>Allows for those industries which use and dispose of water where there is no use of council water infrastructure, and they are entirely self-sufficient.</p> <p>The relief sought allows for a wider range of industrial activities to be located within the proposed Hautapu Industrial Zone.</p>
<b>SECTION 7 - INDUSTRIAL ZONE</b>				
2.	<p>Ensure that activities within the Hautapu Structure Plan are restricted to dry industry activities due to infrastructure constraints.</p>	Amendments proposed	<p>Ensure that activities within the Hautapu Structure Plan are restricted to dry industries and in addition any other industry which are self-contained, and which do not require the use of council water infrastructure.</p>	<p>The relief sought allows for a wider range of industrial activities to be located within the proposed Hautapu Industrial Zone.</p> <p>Restricting the industrial area to those industries which are dry is a very short-term development view. There is an increasing requirement for industrial areas in the region, however they need to cater for all industry types.</p>

#	Proposed Plan Change 17	Support Oppose	Relief Sought	Reasons
<b>PROPOSED RULES</b>				
3.	<p>7.4.1.5 Non-Complying Activities</p> <p>Notwithstanding Rule 7.4.1.3(f), the following activities are non-complying activities within the Bardowie Industrial Precent Structure Plan Area and Hautapu Industrial Area 'Area 6'</p> <ul style="list-style-type: none"> <li>(i) Bitumen plants;</li> <li>(ii) Incineration activities;</li> <li>(iii) Concrete batching plants;</li> <li>(iv) Relocated buildings</li> </ul>	Object	<p>7.4.1.5 Non-Complying Activities</p> <p>Notwithstanding Rule 7.4.1.3(f), the following activities are non-complying activities within the Bardowie Industrial Precent Structure Plan Area and Hautapu Industrial Area and 'Area 6'</p> <ul style="list-style-type: none"> <li>(i) Bitumen plants;</li> <li>(ii) Incineration activities;</li> <li>(iii) Concrete batching plants;</li> <li>(iv) Relocated buildings</li> </ul>	<p>Firstly, it is unclear if this rule only applies in Area 6 or covers the whole of the Hautapu Industrial Area, please add more specific wording.</p> <p>There is no reason for concrete batching to be non-complying. If any proposal to establish a batching plant can manage water use and disposal within the site without requiring the use of external council infrastructure and there are no health or environmental impacts, then concrete batching should be excluded from this rule.</p> <p>Concrete batching is an appropriate activity for an "Industrial Zone". The activity is currently covered by rule 7.4.1.1(a) any infringement of performance standards should revert to Restricted discretionary (restricted to matters involving water use and management).</p>
<b>APPENDIX S1 - FUTURE GROWTH CELLS</b>				
4.	<p><b>Cambridge/Hautapu Industrial Growth Cells – now to 2035</b></p> <p>Intended for industrial development, the C9 growth cell is located within the Hautapu Structure Plan area. A combination of both the C8 and C9 areas has been identified as necessary to satisfy the industrial needs for Cambridge.</p>	Support	-	<p>Uplifting the deferred C9 industrial zone is appropriate given that the land has already progressively been developed for industrial uses.</p>

#	Proposed Plan Change 17	Support Oppose	Relief Sought	Reasons
	The area is currently unserviced, with the structure plan review identifying needed infrastructure			



Nicky Hogarth  
Address for service

National Environment and Sustainability Manager

**Allied Concrete Limited**



Date: 3 November 2022