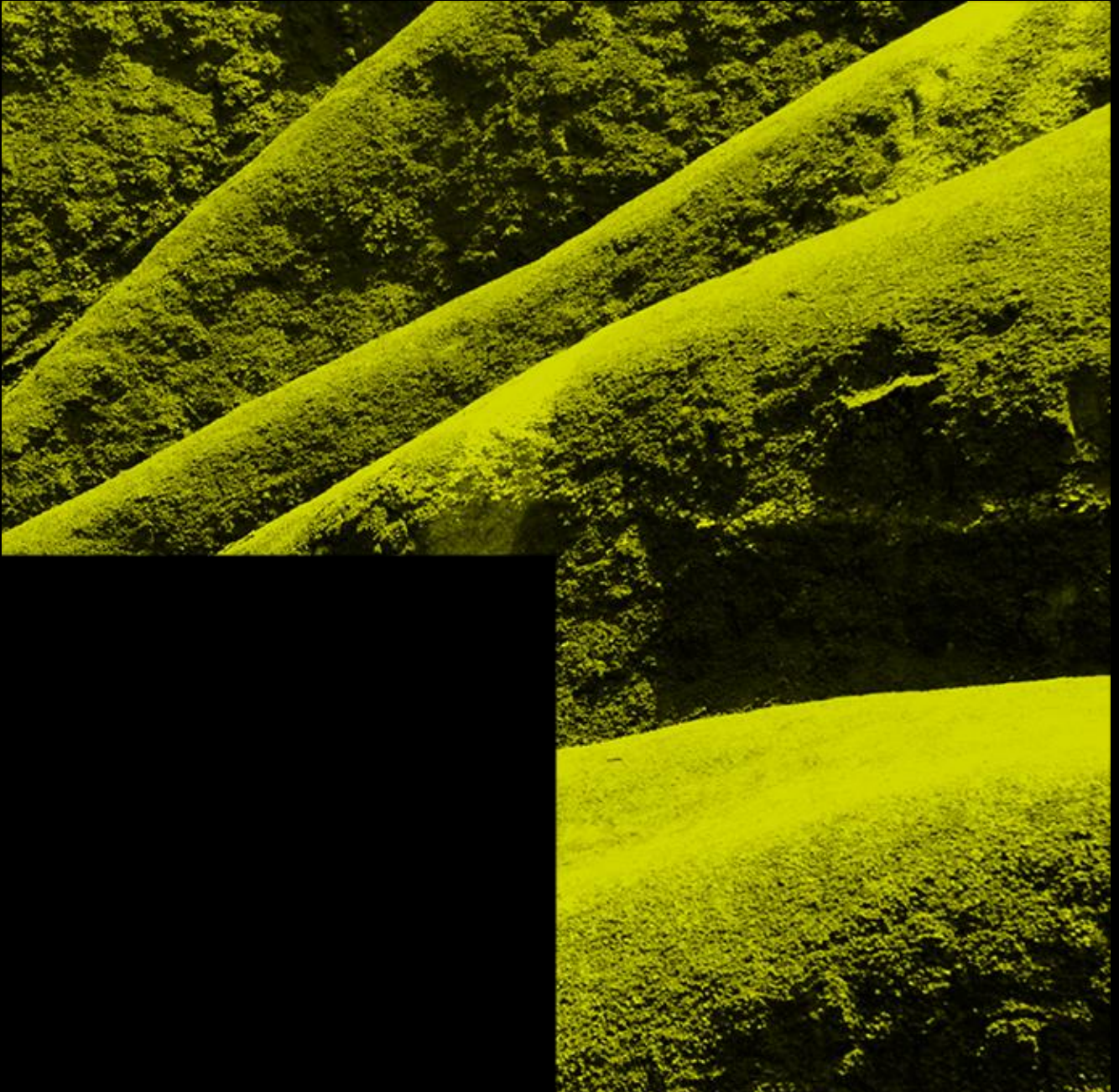


NORTHERN PRECINCT

Section 32 Evaluation

Titanium Park Limited & Rukuhia Properties
Limited





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1.0 INTRODUCTION

This Section 32 Evaluation Report has been prepared in support of a private plan change request to the Operative Waipa District Plan (the WDP) by Titanium Park Limited and Rukuhia Properties Limited (the 'applicants').

The request (proposal) is seeking to expand the Northern Precinct of the Airport Business zone, amend the Structure Plan for the Airport Business zone and make several amendments to objectives and supporting provisions of the WDP. The extent of the site that is subject to the request is set out within **Figure 1** below.



FIGURE 1: The extent of the plan change request is shown in red outline

Further details of the plan change request are included within the plan change request application and supporting reports, which should be read in conjunction with this evaluation report.

In summary, the proposal is seeking the following changes to the WDP:

1. The rezoning of approximately 89ha of land from Rural to Airport Business zone (refer **Figure 2** below).
2. Amendments to the Airport Business Structure Plan contained in Appendix 10 (refer **Figure 3** below).
3. Amendments to the provisions that are contained within 'Section 10 -Airport Business Zone (Titanium Park)'.
4. Amendments to the objectives and supporting provisions that are contained within 'Section 15- Infrastructure, Hazards, Development and Subdivision'.
5. Amendments to the provisions contained within 'Section 21 - Assessment Criteria and Information Requirements'.

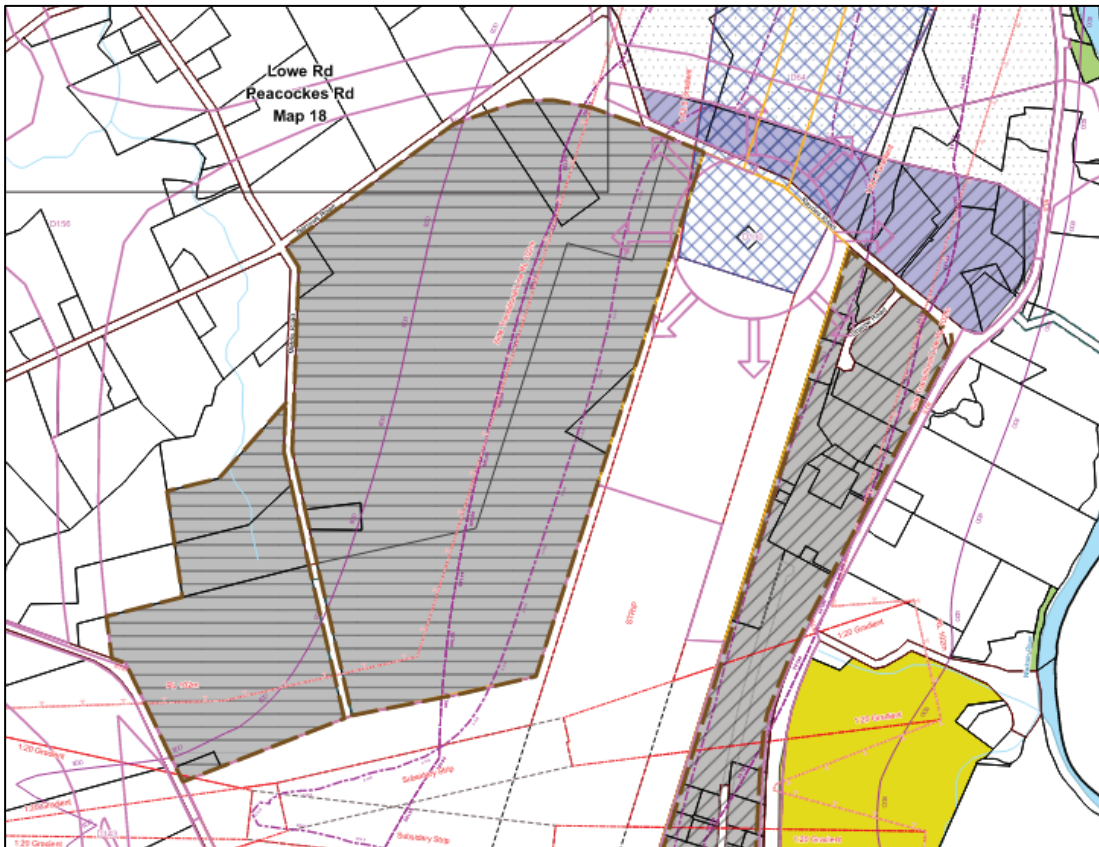


FIGURE 2: The proposed extent of the rezoning

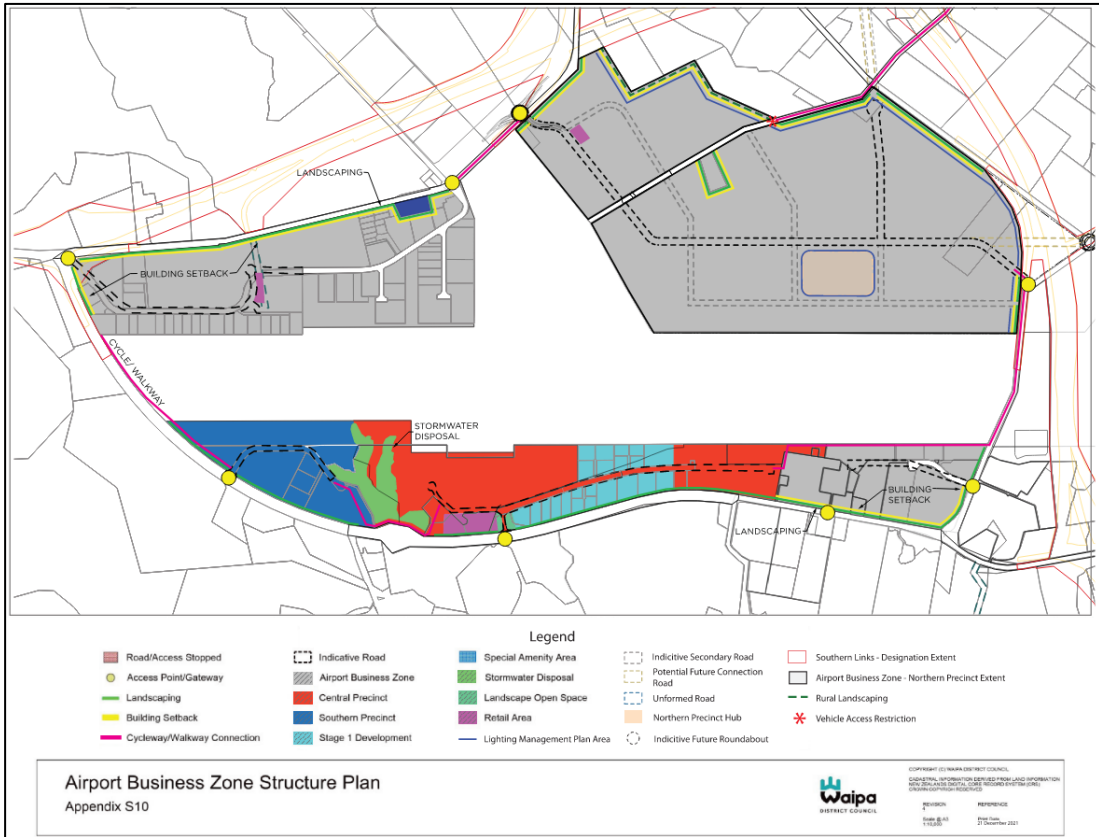


FIGURE 3: The proposed updated Airport Business Structure Plan

Section 32(1)(a) of the Resource Management Act 1991 (the 'Act') requires an evaluation to examine the extent to which the objectives of the proposal are the most appropriate way to achieve the purpose of the Act. The objectives are defined within s32(6) to mean:

- a. For a proposal that contains or states objectives, those objectives); and
- b. For all other proposals, the purpose of the proposal

In addition, s32(1)(b) of the Act requires an examination of whether the provisions in the proposal are the most appropriate way to achieve the objectives by:

- (i) identifying other reasonably practicable options for achieving the objectives; and
- (ii) assessing the efficiency and effectiveness of the provisions in achieving the objectives; and
- (iii) summarising the reasons for deciding on the provisions.

Further requirements for the assessment required under s32(1)(b) are set out in s32(2), including requirements to identify and assess relevant benefits and costs.¹

The following sections provide the evaluation that is prescribed by s32 of the Act:

- Section 2 provides details of the objectives of the plan change request (the proposal) and assesses the appropriateness of the proposal to achieve the purpose of the Act.
- Section 3 then assesses the appropriateness of the provisions to achieve the relevant objectives. It does this by identifying the other reasonably practicable alternative options to achieve the objectives, assessing the provisions' efficiency and effectiveness as well as their costs and benefits. It also includes an assessment of the risks of not acting, and the reasons for deciding on the provisions. The remaining aspects of S32 are also addressed within this section.

¹ See also s32(3).

2.0 THE PLAN CHANGE OBJECTIVES

2.1 THE OBJECTIVES OF THE PLAN CHANGE

The proposed plan change (the proposal) is seeking to:

- Retain objectives that are contained within Section 10 – Airport Business Zone (Titanium Park) within the WDP; and
- Amend one existing objective and include a new objective within Section 15– Infrastructure, Hazards, Development and Subdivision’ of the WDP.

These changes are summarised within section 2.1.1 below.

The purpose / overall intent of the plan change is:

“To achieve the co-ordinated expansion of the Northern Precinct within the Airport Business zone and to enable it to be developed in line with what has been envisaged by the Northern Precinct Masterplan.”

2.1.1 THE OBJECTIVES OF THE AIRPORT BUSINESS ZONE

The proposal is seeking to retain the following objectives of the Airport Business zone without change:

Objective 10.3.1 - Strategic physical resource

To support the economic and social well-being of the Waikato Region through providing for the integrated future development of the Airport and its surrounding land as a transport hub and business location, taking advantage of its strategic location and infrastructure while managing adverse effects on Airport operations.

Objective 10.3.2 - Provide for business park

To provide for industrial and business activities, including offices and limited retail activities in an integrated mixed use business park within a defined area.

Objective 10.3.3 - Development within the Southern Precinct

To enable the development of the Southern Precinct while maintaining the safety and efficiency of State Highway 21.

The proposal is seeking to make minor amendments to Objectives 15.3.17 and 15.3.18 to remove the reference to ‘International’ from the Airport title and to remove the requirement for Comprehensive Development Plans (CDP) within the Airport Business zone² (proposed additions underlined):

Objective 15.3.17 - Comprehensive development plans

To achieve integrated development of land surrounding Hamilton ~~International~~ Airport through the requirement for comprehensive development plans (excluding the Airport Business zone).

Objective 15.3.18 - Comprehensive development plans: integrated development

² We note that the CDP process still applies to both the Industrial zone at Raynes Road as well as the Mystery Creek zone which could be considered to be land surrounding the Airport. As such we have excluded the ABZ from this objective rather than seeking it to be deleted altogether.

To achieve the efficient and cost effective infrastructure for land within the comprehensive development plan areas located in the ~~Hamilton Airport Strategic Node and the Agri-activities Overlay of the Mystery Creek Events Zone~~ by ensuring that the servicing provided is appropriate to the land use and future development.

The proposal is also seeking to include one new objective that will effectively retain the intent of achieving the integrated development of land and infrastructure while avoiding reference to a CDP process which has now been found to be ultra vires. The new objective is proposed as:

Objective 15.3.19 – Integrated Transport within the Northern Precinct of the Airport Business zone

To enable the integrated development of the Airport and its surrounding land as a transport hub and business location, taking advantage of its strategic location and infrastructure.

2.2 ASSESSMENT OF OBJECTIVES AGAINST PART 2 OF THE ACT

Section 32(1)(a) of the Resource Management Act 1991 (the 'Act') requires an evaluation to examine the extent to which the objectives of the proposal are the most appropriate way to achieve the purpose of the Act.

The purpose of the Act is to promote the sustainable management of natural and physical resources.

The minor amendments that are proposed to Objectives 15.3.17 and 15.3.18 to remove the requirement for Comprehensive Development Plans within the Airport Business zone are an appropriate way to achieve the purpose of the Act because the CDP process has been found to be ultra vires on the basis of recent case law³. Those decisions held that:

- (a) Plans (including Framework Plans, Comprehensive Development Plans and Master Plans) are not activities for which consent can be obtained; and
- (b) An activity's status is derived from the RMA and its subsidiary planning instruments. Activity status cannot be determined by whether (or not) another resource consent has been granted.

The proposed new objective (15.3.19) is an appropriate way to achieve the purpose of the Act because it will effectively retain the intent of achieving the integrated development of land and infrastructure while avoiding any reference to the CDP mechanism and process. This ensures that the objectives applying to the Northern Precinct of the Airport Business zone (the subject of this plan change) will be consistent with current planning case law.

³ *Queenstown Airport Corporation v Queenstown Lakes District Council* [2014] NZEnvC 93
Re Auckland Council [2016] NZEnvC 56, (2016) 19 ELRNZ 425

A detailed assessment of the objectives of the plan change as set out within section 2 above (and the wider plan change request itself) against the purpose of the Act has been undertaken within the plan change request application report. This demonstrated that what is proposed is the most appropriate way to achieve the purpose of the Act because⁴:

- It will enable the efficient use and development of a scarce land resource.
- It will enable people and communities to provide for their economic well-being by releasing industrial land for development and employment creation, for which there is a demonstrated and proven demand in the greater Waipa/Hamilton area.
- Parts of Northern Precinct land comprise high ecological values associated with their use by long-tailed bats for foraging and feeding, specifically around the proposed Hub area located near the centre of the precinct, and the potential for bat roost trees within the precinct. These values meet the Waikato Regional Policy Statement criteria for significant indigenous biodiversity (significant habitat of indigenous fauna), and as such the proposal responds by requiring the preparation an Ecological Management Plan will be used to manage and inform the development of the precinct. The EMP will contain:
 - A Bat Management Plan that identifies all potential bat roost trees within the Northern Precinct and includes an analysis of the practicability of retaining each potential roost tree as part of the development of the Northern Precinct in line with the Structure Plan and identifies any trees that need to be removed (including specifying reasons). It then is required to specify best practice tree removal protocols and specify mitigation for any potential roost trees that have been identified as needing to be removed, and methods to mitigate associated ecological effects. Where any ecological effects are unable to be mitigated, the Bat Management Plan shall set out methods to ensure that any more than minor residual ecological effects are offset to achieve a no net loss outcome.
 - A Lighting Management Plan that will inform on lot development within an east-west corridor through the northern boundary of the precinct and within the Hub (as defined on the proposed Airport Business Zone Structure Plan). The objective of the plan is to contribute to the long-tailed bat flyway network by setting lighting outcomes (which could include specifying low light levels / directional lighting) that any lots within these areas will need to comply with.
 - Ecological recommendations for landscape planting to be implemented throughout the precinct, including specimen, sizing and design requirements to encourage long-tailed bat foraging and/or commuting.
- There are no natural wetlands or streams, only artificial channels which are in an ecologically degraded state.
- There is no recorded or identified archaeology in the area, and it is considered highly unlikely that archaeology exists within the area or landscape. This means that effects on archaeology will be avoided.
- While the central hub area will provide day-to-day amenities for workers in the Business Park, this onsite retail will be focussed on meeting the daily needs of local business and workers (not nearby centres) and so will not have any discernible impact on the vitality of other centres. As such adverse economic effects will be avoided.

⁴

Section references below are to sections in Part 2 of the Resource Management Act 1991.

- The proposal supports the retirement of the land from continued grazing, farming/rural activities and enables progress towards urbanisation that can make more efficient use of the land area and improve the quality of downstream water bodies through reduced nutrient loading and soil erosion (that would be associated with horticultural or agricultural activities).
- There are no identified outstanding natural features or landscapes within the proposal extent in relation to section 6(b) or significant indigenous vegetation or significant habitats of indigenous fauna (other than long-tailed bats) in relation to section 6(c).
- The proposal has responded to feedback provided by mana whenua as part of the masterplan development and plan change request drafting phases. A Cultural Impact Assessment (CIA) is being prepared by Nga Iwi Toopu o Waipa that will enable a greater understanding of the relationship that mana whenua have with the land, water, sites, waahi tapu, and other taonga in relation to Section 6(e).
- At this stage there are no known historic heritage features relevant in terms of section 6(f) and no known customary rights issues with respect to Section 6(g) within the site.
- There are no unmanageable hazards identified on the site that could preclude the proposed rezoning accommodating future industrial growth in respect of Section 6(h).
- In terms of Section 7(a), the proposal will have regard to protection of the natural environment, noting that appropriate stormwater management will be incorporated into the future development of the site.
- In terms of Section 7(b), the proposal will enable the efficient use and development of the land, noting:
 - The area is a direct continuation of other industrial growth around Hamilton Airport.
 - The Structure Plan will provide for effective connectivity between the Northern Precinct and other precincts, the future Southern Links and will enable integration with several required transport upgrades in the area.
 - The central hub within the Northern Precinct will provide for day-to-day needs of future employees in the area, meaning they will not have to travel to other centres as regularly.
 - The land is in a strategic location in the southern corner of the Golden Triangle, enabling cross-regional industrial efficiency.
 - The proposed street pattern will allow for a flexible development pattern that will ensure the site will support good built form outcomes and can accommodate various development opportunities.
- In terms of section 7(c), the maintenance and enhancement of amenity values, the plan change will unavoidably result in some change in character from rural to urban, however, this urban growth is a direct extension of existing airport business development. The proposed extension will manage this impact on amenity values by incorporating landscaping and building setbacks around the external boundaries of the precinct to improve the transition from rural to airport business.

- With regards to sections 7(d), 7(f) and 7(h), the site does not contain any natural watercourses or wetlands. It does, however, comprise high ecological values associated with its use by long-tailed bats for foraging and feeding, specifically around the proposed Hub area located near the centre of the precinct. The proposal responds to these by requiring the preparation of an Ecological Management Plan that will be used to manage and inform the development of the precinct.
- With regard to section 7(i), the proposal promotes active transport methods through the incorporation of cycle ways. The Plan Change will result in a reduction of pastoral rural land which drains through a network of artificial watercourses and eventually into the Waikato River. Appropriate stormwater mitigation will be incorporated into any future development to avoid adverse stormwater quality effects on the Waikato River. In addition to this, there is no risk of flooding to the site from the Waikato River.
- With regard to section 8, there has been a history of engagement with mana whenua regarding activities at and surrounding Hamilton Airport. Specific to this proposal, the applicants have held two separate hui with Nga Iwi Toopu o Waipa – firstly early in the masterplanning process and secondly in the final stages of preparing the Plan Change Request and one with Waikato-Tainui earlier this year. The applicants have endeavoured to respond to the feedback that was received (including to maintain views of Pirongia) as well as investigating the ecological values on the site. A Cultural Impact Assessment has been commissioned and is currently being prepared to further understand cultural matters and enable the proposal to accord with the principles of the Treaty of Waitangi.

3.0

THE APPROPRIATENESS OF THE PROVISIONS

The proposal is also seeking to expand the extent of the Northern Precinct of the Airport Business zone and update the Airport Business Zone Structure Plan that is contained within Appendix S10 of the District Plan.

The updates to the Airport Business Structure Plan include specifying the various transport upgrades that will be required to enable the full development of the Northern Precinct (along with when they will be required) and the requirement for an Ecological Management Plan to be prepared that will manage and inform the development of the precinct. These are both linked to rules within Sections 10 and 15 of the District Plan that require them to be complied with by any subsequent subdivision, development or activities.

3.1 AN ASSESSMENT OF ALTERNATIVE OPTIONS

We have identified four reasonably practicable alternative options to achieve the objectives of the plan change.

3.1.1 OPTION 1: STATUS QUO (RETAIN THE CURRENT ABZ ZONING AND PROVISIONS)

This option involves retaining the existing extent of the Northern Precinct (approximately 41ha) and developing it in accordance with the current Airport Business Zone Structure Plan and Airport Business Zone provisions.

This option would:

- Enable approximately 41ha of business zoned land to be developed that would meet short - medium term demand.
- Require the development to be integrated with infrastructure provision (including funding) but would do so via the CDP framework that has been found to be ultra vires.
- Fail to include any recognition of the high ecological values within the site, enabling tree removal and development to occur without mitigation or offsetting.
- Require transport access to be provided through the Southern Precinct via the roundabout intersection at State Highway 3 and State Highway 21. It would prevent any more direct access to either state highway as well as either Middle, Narrows or Raynes Road. It would increase travel distance and time for any workers, visitors or freight movement that needed to travel northward from the precinct.
- Result in the creation of a series of cul-de-sacs that do not connect to the surrounding road network nor create an urban form that could efficiently be scaled to accommodate the precinct growing over time.
- Preclude the placemaking opportunity that exists in the Hub that is proposed to be located within the centre of the Northern Precinct. This would be precluded because the current zoning extent does not extend sufficiently into this part of the site.
- Retain the current rural land uses within the balance of the land. This would include the growing of maize on the balance of the TPL land and the Pioneer operation on the RPL land.
- Result in only part of TPL's land being used for Airport Business zone activities, leaving a smaller portion that would be retained as a rural zoning. The smaller scale of this area along with the uncertainty that would exist around the long-term likelihood of this land having a rural zoning (given the growth predicted within the 'Hamilton Airport Strategic Node map' contained in Appendix S1 of the WDP specifically) would compromise and limit the ability of this land to be economically used for rural purposes.

3.1.2 OPTION 2: EXPAND THE ABZ ZONE AND UPDATE THE STRUCTURE PLAN, BUT RETAIN THE EXISTING PLAN PROVISIONS

This option involves expanding the Northern Precinct of the Airport Business zone from 41ha to approximately 130ha, which would also require the consequential updating of the Airport Business Structure Plan to align with the increased extent but retaining the same roading pattern as the existing structure plan (including access arrangements). It would involve retaining the existing WDP provisions (including Section 10, 15 and 21).

This option would:

- Enable the full 130ha of business zoned land to be developed that would go toward meeting short - medium term and long term demand.
- Fail to include any recognition of the high ecological values within the site, enabling tree removal and development to occur without mitigation or offsetting.
- Require transport access to be provided through the Southern Precinct via the roundabout intersection at State Highway 3 and State Highway 21. It would prevent any more direct access to either state highway as well as either Middle,

Narrows or Raynes Road. It would increase travel distance and time for any workers, visitors or freight movement that needed to travel northward from the precinct.

- Result in the creation of a series of cul-de-sacs that do not connect to the surrounding road network nor create an urban form that could efficiently be scaled to accommodate the precinct growing over time.
- Require the development to be integrated with infrastructure provision (including funding) but would do so via the CDP framework that has been found to be ultra vires.
- Preclude the ability to establish limited retail within the Hub or the western corner of the precinct by retaining the current rule framework (that would cause these to be Non-Complying as well as retaining the existing GFA cap).
- Preclude the ability to apply tailored noise and landscaping requirements to the external boundaries of the precinct, including sections of boundaries that adjoin the Rural zone.

3.1.3 OPTION 3: EXPAND THE ABZ, UPDATE THE STRUCTURE PLAN AND AMEND THE PROVISIONS

This option involves expanding the Northern Precinct of the Airport Business zone from 41ha to approximately 130ha, updating the Airport Business Structure Plan to align with the increased extent and in line with the Northern Precinct Masterplan and updating the plan provisions to align with the structure plan and remove the CDP requirements.

This option would:

- Enable the full 130ha of business zoned land to be developed that would go toward meeting short - medium term and long term demand.
- Enable the Northern Precinct to be developed using a more efficient and effective roading structure that would also be more readily be expanded over time.
- Enable a roading pattern that is aligned with distant Maunga to aid way finding, creating a sense of place and respecting cultural values.
- Adopt a structure planning process that was based on the full 130ha extent of the Northern Precinct. This enables a longer term and more strategic approach to be taken for the precinct (compared to what would otherwise be possible if the plan change request only focussed on the 41ha of Northern Precinct that currently has an operative Airport Business zoning).
- Recognise the high ecological value of the site by requiring an Ecological Management Plan that will be used to manage and inform the use and development of the Northern Precinct, including specifying mitigation and offsetting measures to be adopted.
- Remove the requirement for a CDP process that has been found to be ultra vires, and replace it with a requirement for the development of the Northern Precinct to be integrated with the delivery of specific transport upgrades. These are specified in Table S10 along with when they are required.
- Enable the creation of the Hub within the precinct that will aid with placemaking, wayfinding and support the needs of visitors and workers within the Northern Precinct by providing a limited scale of retail and services.

- Enable the provision of a limited amount of retail within the western side of the precinct to provide for the convenience needs of workers and visitors that are local to that portion of the precinct.
- Enable the ability to apply tailored noise and landscaping requirements to the external boundaries of the precinct, including sections of boundaries that adjoin the Rural zone.

3.1.4 OPTION 4: ESTABLISH ON AN ALTERNATIVE SITE

This option would involve establishing an industrial area of a comparable scale and form in a different part of the Waipa District.

The option would:

- If a suitable site(s) was available, potentially enable a similar scale of business zoned land to be developed that would go toward meeting short - medium term and long term demand for the District.
- Theoretically enable a similar scale and outcome to be achieved on land which may be less constrained by the need for transport upgrades and/or ecological management.
- Importantly, result in the underutilisation of land that is highly suitable for business and industrial use given its existing Airport Business zoning; site attributes of flat topography, strong transport connections and co-location with the Airport and other industrial zoned land; and available infrastructure capacity.
- Importantly, not implement the strategic direction given by Future Proof, the Regional Policy Statement or the District Plan.
- Likely also need to respond to development constraints that would apply to the particular site, which lead to any development creating its own set of adverse effects.

3.1.5 THE REASONS FOR DECIDING ON THE PROVISIONS

For the reasons outlined in this evaluation report and the other documents supporting the plan change request, we have concluded that Option 3 is the most appropriate approach for achieving the relevant objectives. The zoning, structure plan and provisions are all interlinked, and all require updating in order to fully achieve the objectives.

3.2 COST - BENEFIT ASSESSMENT

This section provides an assessment of the costs and benefits of the environmental, economic, social and cultural effects (including economic growth and employment) that are anticipated from the implementation of the provisions as required under sections 32(2)(a) and (b) of the Act.

TABLE 1: COST BENEFIT ANALYSIS IN ACCORDANCE WITH SECTION 32(2) OF THE ACT

	BENEFITS	COSTS
Environmental	<p>Benefits associated with retiring the land from agricultural and/or horticultural land use. Including reduced nutrient loading into receiving waterways and groundwater (through a reduction in fertiliser use) and reduced soil erosion (that would be associated with horticultural or agricultural activities).</p> <p>Introduction of stormwater treatment to improve the quality of water entering receiving waterways.</p> <p>Maintain the high ecological values on the site through the development of an Ecological Management Plan, which will comprise a Bat Management Plan, Lighting Management Plan and ecological recommendations on landscape planting within the precinct.</p> <p>Opportunities to introduce locally sourced native vegetation through street planting, landscape features, landscape screening and landscaping planned within the Hub.</p> <p>Removal and/or the management of potentially contaminated soils that would be required through the development of the site for industrial / business purposes.</p> <p>The potential for a reduction in commuter distances through the creation of employment opportunities close to the Peacocke growth cell and Tamahere. This will be further supported by the promotion of a walking and cycling connection between Peacocke and the Northern Precinct.</p>	<p>The proposal will result in the loss of productive soils, although it is noted that the ownership of the site is already fragmented and approximately 40ha is already zoned for Airport Business use, with the remainder also indicated as a growth area under the WDP.</p> <p>Potential for loss of existing vegetation (and therefore habitat) within the site that is either unsuitable or is not practical to be retained as part of site development – although we note that the Ecological Management Plan will specify appropriate ecological mitigation or offsetting for any such loss.</p> <p>Enabling new impervious surfaces that will both increase the volume of stormwater being generated as well as the level of contaminants within the stormwater (associated with roads and yard areas). This has the potential to enter the receiving waterways if not managed appropriately, which would then cause increased stream erosion and a reduction in water quality.</p> <p>Soil erosion associated with land modification required to develop the site for industrial / business use. This can be readily managed though the implementation of best practice sediment and erosion control measures during development.</p>

TABLE 1: COST BENEFIT ANALYSIS IN ACCORDANCE WITH SECTION 32(2) OF THE ACT

	BENEFITS	COSTS
Economic (including employment)	<p><u>Job creation and employment opportunities</u> Benefits arising from additional job creation and employment opportunities.</p> <p><u>Synergies/Agglomeration with Existing Uses</u> The proposal will expand an existing urbanised/developed Airport Business Zone and the Airport and enable agglomeration benefits to be realised. Agglomeration benefits refer to the economic efficiencies that may arise when economic activities cluster together. This clustering of economic activity, in turn, can help to reduce transport costs and lift the average productivity of firms (for example, through the sharing of labour, specialised assets, and ideas).</p> <p>The provisions will also enable agglomeration benefits associated with channelling retail into the Hub as well as a smaller pocket on the western extent of the precinct.</p> <p><u>Infrastructure Efficiency</u> The development will largely be self-sufficient with respect to infrastructure, and therefore will not incur significant infrastructure costs for the Council, that would later have to be recouped through funding tools such as development contributions. By avoiding the imposition of infrastructure costs on the Council, the development will help Waipa District to better manage its debt and remain within prudential debt limits set through legislation. In addition, the absence of Council-funded infrastructure will eliminate the risk that Councils take when they provide capacity ahead of demand, the exact nature and timing of which is uncertain.</p>	<p>The financial cost of providing the necessary infrastructure to support the proposal. This includes the necessary upgrades to provide water, wastewater and stormwater services along with the necessary upgrades that are required for the transport network.</p> <p>Opportunity cost associated with the loss of productive soils and associated rural business operations.</p> <p>The financial cost of the plan change process to enable the proposal.</p>

TABLE 1: COST BENEFIT ANALYSIS IN ACCORDANCE WITH SECTION 32(2) OF THE ACT		
	BENEFITS	COSTS
	<p><u>Economic Stimulus of Construction</u></p> <p>Including flow-on effects, it is estimated that the development of the additional GFA enabled by the proposal (estimated to be a yield of 189,000m² of additional GFA) could:</p> <ul style="list-style-type: none"> • Generate a one-time boost in regional GDP of \$130 million; • Create employment for 1,440 people-years⁵; and • Boost household incomes by \$70 million 	
Social	<p>Benefits arising from additional job creation and employment opportunities.</p> <p>The financial cost of the plan change request largely is being borne by the applicants rather than Waipa District Council (and ratepayers). This is beneficial by avoiding an opportunity cost associated with funding a public plan change that could otherwise be spent on providing for people's social wellbeing within the District.</p>	<p>A portion of the financial cost of the infrastructure may be borne by Waipa District Council (and ratepayers) although a significant proportion is expected to be funded by the applicant. This may preclude spending on other Council projects or initiatives that would derive a social benefit.</p>
Cultural	<p>To be confirmed following the receipt of the Cultural Impact Assessment from Nga Iwi Toopu o Waipa.</p>	<p>To be confirmed following the receipt of the Cultural Impact Assessment from Nga Iwi Toopu o Waipa.</p>

⁵ One person-year means one person employed for a full year. Hence, 100 people-years could mean 100 people employed for one year, 50 people employed for 2 years, and so on.

3.3 EFFICIENCY AND EFFECTIVENESS

This section of the report assesses the efficiency and effectiveness of the provisions in achieving the relevant objectives.

The provisions will enable the efficient use of a valuable and scarce land resource that is strategically located and well suited to industrial and business use, notably:

- The Northern Precinct (along with the Airport and other precincts within the Airport Business zones) are identified as a Strategic Industrial Node and Urban Enablement Area within the updated Future Proof Strategy 2021.
- The long-term vision for the growth of the Airport as an employment node and strategic industrial area is embedded into various strategic city/district and regional policy documents including the Waipa District Plan, Waipa 2050 (2009), the Metro Spatial Plan (September 2020) and the Hamilton-Auckland Corridor Plan and Implementation Programme (November 2020). In addition, the growth of this employment node can be considered consistent with the National Policy Statement on Urban Development 2020.
- The site is strategically located to take advantage of ongoing growth in freight movements, with strong connections to state highways on either side (SH3 and SH21) and only a short distance from SH1 to the east. Its also able to connect to the rest of the country through passenger and freight flights.

The site's gentle contour enables it to be efficiently developed for industrial and business use, with very little land modification required to achieve flat building platform and yard areas that industrial users require.

The provisions will enable an efficient procedural planning process through the removal of the CDP process, which would otherwise require a two staged resource consent process to be followed.

Efficiency gains are also achieved by developing an updated Airport Business Zone Structure Plan based on an integrated Masterplanning process for the full extent of the Northern Precinct. This has also included longer term growth potential that has been signalled by the WDP out towards the Southern Links designation. This strategic approach has been followed to ensure that a well-functioning urban environment can be achieved that is flexible enough to respond to changing market conditions and possible expansion over time.

The provisions are effective because:

- Structure Planning enables an effective urban form to be achieved across several parcels in different ownership.
- The updated Airport Business Zone Structure Plan has been based on an integrated masterplanning process that is consistent with best practice urban design principles whilst also delivering a pattern that is flexible to accommodate a wide range of industrial and business uses.
- The adoption of updated road cross sections enables a roading hierarchy to be achieved within, what will be, the largest of all precincts at the Airport. This assists in way finding throughout the development as well as ensuring that roads can be tailored to the volume of traffic they are intended to accommodate (and thereby avoiding either over designed or inadequate infrastructure provision).
- The provisions enable an appropriate type and level of retail to be established within the precinct, which will be channelled to within the Hub as well as a

smaller pocket on the western extent of the precinct. This will assist with placemaking within the development that will achieve a high-quality and well-functioning urban environment.

- The updated Structure Plan provides clarity and certainty around the various transport upgrades that are required to be delivered to support the full development of the Northern Precinct. This also enables development and infrastructure to be integrated, which was the objective of the prior CDP process.
- The updated Structure Plan requires the preparation of an Ecological Management Plan that will be used to inform and manage the use and development of the Northern Precinct so as to maintain the high ecological values of the site.

3.4 THE RISK OF NOT ACTING

Section 32(2)(c) requires an assessment of the risk of acting or not acting if there is uncertain or insufficient information about the plan change.

We are of the view that the information that supports the plan change request is sufficient and not uncertain. The request has been developed following an integrated masterplanning process that has involved stakeholder and mana whenua engagement.

The request has been supported by technical assessments including transport, ecology, urban design, infrastructure, landscape and visual, archaeology, geotechnical, contamination, acoustic and economic assessments. These form a robust evidence base for the request and as such, we are of the view that sufficient information has been collated.

4.0 CONCLUSION

The plan change proposes the co-ordinated expansion of the Northern Precinct within the Airport Business zone and to enable it to be developed in line with what has been envisaged by the Northern Precinct Masterplan.

This assessment has demonstrated that:

1. The objectives of the proposal are the most appropriate way to achieve the purpose of the Act;
2. The provisions of the plan change are the most appropriate way to achieve the relevant objectives and preferred to alternative options;
3. The overall benefits of the proposal outweigh the costs on the community, the economy and the environment; and
4. The provisions are an efficient and effective way of achieving the objectives.

5.0 LIMITATIONS

This report has been prepared for the particular project described and for the purpose of satisfying the statutory information requirements for an application being made under the Resource Management Act 1991. No responsibility is accepted by Harrison Grierson Consultants Limited (or its directors, agents or employees) for the use of the report or any part of it in any other context or for any other purpose.

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