

Summary of Decisions Requested to Proposed Private Plan Change 20: Airport Northern Precinct Extension By Submitter

11th November 2022

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Reader's Guide

This document is a summary of the 26 submissions received and the relief sought/decision(s) requested. This summary is ordered by submitter number. This summary helps readers to see all the decisions requested by submitter. If you would like to see all the submissions lodged by topic on the proposed plan change, then refer to "Summary of Decisions Requested to Proposed Private Plan Change 20: Airport Northern Precinct Extension by Topic".

NOTE: *Submissions were received seeking to rezone additional land beyond the area proposed to be rezoned in the plan change. Requests for additional or extended zoning are likely to be out of scope and unable to be considered*

Call for further submissions opens on **11 November 2022**. The closing date for making further submissions is **25 November 2022** . **No late further submissions will be accepted.**

In the summary, every submitter has been allocated a submitter number and each submission point is referenced by a unique number. This whole number (e.g. 1.3) is required to be referenced when you make a further submission. **EXAMPLE:**

Submission 1.3

1 is the submitter number

3 is the submission point number

How to read the summary:

- This summary is ordered by submitter number. The summary lists all of the submission points made by all the submitters.
- If after looking at this summary you wish to look at all the submission points to a particular topic then you need to refer to the "Summary of Decisions Requested to Proposed Private Plan Change 20: Airport Northern Precinct Extension by Topic".
- For your information separate spell checks have been carried out on the Topic and Submitter reports. In the event of there being any discrepancy the "Summary of Decisions Requested to Proposed Private Plan Change 20: Airport Northern Precinct Extension by Submitter" will prevail.

How to make a further submission

People can make a further submission if they represent a relevant aspect of the public interest and/or have an interest in Proposed Private Plan Change 20 greater than the interest of the general public.

A further submission can only be made in support or opposition of matters raised in the submissions. No new points can be raised.

Further submissions should be set out in the format shown in the submission form. Copies of the further submission form are available at Council offices or Libraries at Cambridge and Te Awamutu as well as online at www.waipadc.govt.nz/plan-change-20.

In accordance with the Resource Management Act 1991 a copy of the further submission must be sent to the person who made the original submission within five (5) working days of sending the further submission to the Waipā District Council. To assist you with this an address list of all submitters is included in this report.

Submissions can be:

Posted to: Waipā District Council
Private Bag 2402
Te Awamutu 3840

Delivered to: Waipā District Council – Te Awamutu Office
101 Bank Street
Te Awamutu

Delivered to: Waipā District Council – Cambridge Office
23 Wilson Street
Cambridge

Emailed to: districtplan@waipadc.govt.nz

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Tabby Tiger Ltd	mark.chrisp@mitchellldaysh.co.nz / 027 475 8383	15
Go Eco	ellen@envirocentre.org.nz / 022 523 9560	16
Fire and Emergency NZ	alec.duncan@beca.com / 07 960 7259	17
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Waikato Regional Economic Development Agency	fiona.carrick@tewaka.co.nz / 027 217 9226	26

Jennifer McDowall (1)

Submission Point	Topic	Plan Change Reference	Support/Oppose	Submission Summary	Decision Requested
01.1	Rural amenity	All	Oppose	Re-zoning will reduce the amenity value of my neighbourhood from a pleasant semi-rural area to a quasi industrial area.	Council to reject the proposal.
01.2	Traffic	All	Oppose	Raynes Road is an accident hotspot and there have been recent fatal accidents at both ends, where it connects to SH 3 Ohaupo Rd and to Airport Rd. Not seen as a good idea to put more traffic onto Raynes Rd. Would be trucks as well as cars of workers. Visibility is poor turning into and out of Lowe Rd onto Raynes Rd and accidents at this intersection are likely to increase. People will still use Raynes Rd/ Airport Rd as a shortcut to SH1 Waikato Expressway. The increase in traffic at these high-speed intersections will significantly increase the risk of additional fatal accidents.	Council to reject the proposal. If it does go ahead, would like the timing to be delayed until the Southern Links roading upgrade is in place so traffic will not be added to the current dangerous situation.
01.3	Elite soils	All	Oppose	Soils in this area are flat and fertile and are currently used for growing maize as well as for grazing. NZ is facing a crisis of loss of high-quality soils close to cities, and councils have been asked to identify these soils and put a plan in place to prevent their loss to development.	Council to reject the proposal.

Submission Point	Topic	Plan Change Reference	Support/Oppose	Submission Summary	Decision Requested
01.4	Land supply	All	Oppose	Latent demand for industrial land – with the implication this demand would not be met by the Ruakura development. At 490ha, surely this is more than enough space in the region to meet demand.	Council to reject the proposal.

Raewyn Cals (2)

Submission Point	Topic	Plan Change Reference	Support/Oppose	Submission Summary	Decision Requested
02.1	Traffic	All	Oppose	Mystery Creek Road has already seen significant increases in traffic and in particular heavy traffic. There is no doubt this will further increase, particularly given the road is viewed as a shortcut for trucks and private vehicles. The road is struggling to cope now, let alone with additional traffic. The state of the full length of Mystery Creek Road from Airport Road needs attention and all surfaces, repairs undertaken and ground movement. The bridge towards the intersection at Airport Road is also in need of urgent upkeep, and is unsafe for motorists and pedestrians.	<ol style="list-style-type: none"> 1. Complete the upgrade of road to that of a main road including cycling lane and upgrade of bridge; or 2. Speed limit of 60km for length of road with speed bumps to deter traffic from using as a main road; or 3. Some other suggestion from Council to deter road being used as a main road

Bruce McDowall (3)

Submission Point	Topic	Plan Change Reference	Support/Oppose	Submission Summary	Decision Requested
03.1	Traffic	All	Oppose	Item 4 point 1 of Plan Change: Transport effects on the wider road network. Raynes Road has significant congestion which will be exacerbated by increased traffic. Health and safety concerns for the risk and recent occurrence of fatal accidents. Intersections need upgrading to meet traffic demands and reduce risk of fatal incidents.	Modern roundabouts at each end of Raynes Road would be the responsible health and safety (OSH) response. Saying that this safety issue will be sorted when the Southern Links is implemented, simply isn't good enough. Intersection upgrades are required.

Stephen & Karen Besley (4)

Submission Point	Topic	Plan Change Reference	Support/Oppose	Submission Summary	Decision Requested
04.1	Support	All	Support	We support a community development initiative.	Re-zoning of 141 Middle Road from Rural to Industrial zoning.

Middle Narrows Focus Group (5)

Submission Point	Topic	Plan Change Reference	Support/Oppose	Submission Summary	Decision Requested
05.1	Traffic	All	Oppose	The Northern Precinct development does not need access/egress to Middle Road to operate successfully. This proposed amendment is ambiguous. The residential neighbours wish to maintain their present lifestyle without extra traffic on a rural road.	Clauses S10.2, subclause 2.1 and clause 10.4.2.10 of the Waipa District Plan remain as defined and no amendment made.
05.2	Pedestrian access	All	Oppose	Pedestrian access to Narrows and Middle Road is not necessary for the functioning of the Northern Precinct business.	No pedestrian or vehicle access be allowed to Narrows or Middle Road
05.3	Stormwater management / groundwater	All	Oppose	Land in this area is subject to a high-water table and is serviced by a variety of ditches, some flowing to the river via adjacent properties. There needs to be a plan for retention of water to moderate flows for the increased surface water anticipated.	Developers coordinate with neighbours regarding stormwater flows.
05.4	Timing and sequencing	All		The Southern Links project has been postponed indefinitely and planning north of the Northern Precinct should be a Waipa District Plan consideration.	No decisions be made about areas outside of the Northern Precinct's northern boundaries until the new Waipa District Plan is discussed and there is no more information regarding Southern Links (particularly the Eastern arm of the project).

James & Marie Snowball (6)

Submission Point	Topic	Plan Change Reference	Support/Oppose	Submission Summary	Decision Requested
06.1	Rural amenity	All	Oppose	There does not appear to be a substantial proposed greenbelt between the northern precinct and existing homeowners which would also include bunding, trees and other planting.	Totally reject the extension as it is not needed and has not been thought through.
06.2	Stormwater management / groundwater	All	Oppose	It is noticeable already with what has been developed at the northern end that the water table levels on our properties are rising dramatically and this has not been factored in.	
06.3	Wastewater disposal	All	Oppose	There is no sewerage treatment plant supplied by the developer.	
06.4	Traffic	All	Oppose	The traffic impacts on surrounding roads will be major.	
06.5	Noise	All	Oppose	The plan doesn't indicate mitigation against noise levels emitted from the new proposed commercial area and business. The removal of one of the hills on the farm on Narrows Road will allow higher noise level to protrude across the district.	
06.6	Land supply	All	Oppose	There is already enough commercial land in the Waipa District around Te Awamutu and Cambridge without increasing this in the northern precinct.	

Royal Forest and Bird Protection Society of New Zealand (7)

Submission Point	Topic	Plan Change Reference	Support/Oppose	Submission Summary	Decision Requested
07.1	Biodiversity	Section 10.2 Resource Management Issues	Oppose	No mention of the impacts on biodiversity except in passing i.e. 10.2.3. The new paragraph is needed in order to give effect to the RMA Section 6(c).	A new paragraph is added to 10.2 specifying that any development does not negatively impact on long-tailed bats being able to persist in this area, including cumulative impacts.
07.2	Bat habitat	Policy 10.3.2.2A	Oppose	Long-tailed bats are critically endangered. Suitably qualified long-tailed bat ecologists are the only people with the knowledge to write an Ecological Management Plan which will enable bats to persist in this area.	Amend the first sentence to: Require the preparation of an Ecological Management Plan to protect roosting, foraging and commuting habitat for long-tailed bats and to ensure overall ecological values are enhanced. This Plan is to be prepared as part of this Plan Change process, and by a suitably qualified ecologist, who must consult with a DOC appointed ecologist, and must also take the wider landscape used by bats into account. Several consequential amendments are also requested to the subsequent bullet points.

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07.3	Ecological Management Plan	Rule/s 10.4.2.14A	Oppose	As above.	The Bat Management Plan is to be developed by a qualified, specialist bat ecologist, in consultation with a bat ecologist appointed by DOC. Identifying roost trees to be conducted over all 4 seasons and several years. The use of other trees in the landscape for commuting and foraging purposes also needs to be identified; also, over all 4 seasons and several years. Historic use by bats of trees recently removed from the area needs to be reviewed; and where this is deemed to have been important for bats, these trees are to be replaced. Commuting / migratory pathways are to be identified over 4 seasons and over several years, in order that these can be protected from light spill and other interference to bats such as roading. Hop overs are to be avoided. The use of other landscape features, such as pasture, for foraging also needs to be identified; also, over all 4 seasons and several years. Tree removal is very much a last resort. Mitigation of the loss of such trees needs to be planned for

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					decades ahead, for example by planting replacement habitat trees sufficiently well ahead of any felling of existing trees that they are mature enough to provide bat habitat by the time existing trees are felled. Night-time noise to be limited to [as determined by a qualified bat ecologist] dB Offsetting for bats is unlikely to be effective, and should not be being considered
07.4	Light Management Plan	Rule/s 10.4.2.14A	Oppose	This section requires a lot more detail; and the Lighting Management Plan needs to be included as an integral part of the Bat Management Plan. Appropriate lighting levels and distances from roost trees, commuting pathways, hop-overs and foraging areas to be determined by a suitably qualified bat ecologist and written into the Bat Management Plan. Light sources that impact bats are not just street lights.	A Lighting Management Plan be applied to on lot development within a 20m corridor applied from identified external boundary extents of the precinct and within the Hub. The Lighting Management Plan shall establish a dark zone within this area for the purpose of contributing to the long-tailed bat flyway network, and provide lighting outcomes (which could include, but are not limited to, specifying low light levels / directional lighting) that any lots within these dark areas must comply with. This section needs to include: Light levels of no more than 0.1 lux at [as determined by a qualified bat ecologist]m from

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					roost trees, commuting pathways and foraging areas, including existing trees and the shelterbelts which are to be replanted. Light from car headlights, security lights and other light sources must be taken into account in this plan.
07.5	Landscape planting	Rule/s 10.4.2.14A	Oppose	Trees need to be of a certain size before they are useful to bats for roosting or other functions such as commuting pathways. If they are not planted early enough they will not reach this size in time. If they are not maintained over time, they may cease to be functional for bats.	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. The time frame for planting also needs to be specified, in order that they reach a size functional for bats before any works commence. There also needs to be a requirement for maintaining these plantings over the long-term.
07.6	Pest control	Rule/s 10.4.2.14A	Oppose	Roads bring pests. People and our food waste (lunch scraps etc.) bring pests.	Pest control needs to be part of the Ecological Management Plan, covering all the introduced predators of bats: rats, stoats, cats and possums.

Sandra Forsyth (8)

Submission Point	Topic	Plan Change Reference	Support/Oppose	Submission Summary	Decision Requested
08.1	Climate Change	All	Oppose	Zoning rural land to business runs counter to one of the primary aims of New Zealanders and the NZ government in limiting climate change. The removal of vegetation directly decreases the uptake of CO2 and the replacement by concrete and asphalt will significantly contribute to local heat emission.	Rezoning of the rural land to business be denied. If the rezoning must go ahead, then provision for a green belt which offsets the heating/climate damage of the building materials and reading, and visual impact of the structures is undertaken. The green belt should be a minimum of 5m around the periphery of the site and planted with trees (including non-natives) rather than low level plants, and green islands (again trees rather than low lying vegetation) within the complex should be present.
08.2	Land supply	All	Oppose	There are already commercial hubs at Ruakura and Horotiu, and to minimise transport emissions, a single site is preferable to numerous sites scattered over the Waikato.	

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08.3	Visual impact / rural amenity	All	Oppose	The visual impact of the proposed development cannot be underestimated. Waikato, and particularly the Waipa district are attractive as a consequence of the rural outlook and in particular the large number of trees that are seen on rural and urban properties. These features are appealing to tourists and a reason to stop in the area rather than drive through. This has not been taken into account with the current development at the Airport. The view from the drive heading east from the airport exit is unattractive due to the recently built commercial buildings almost abutting the fence line. If the rezoning must go ahead, then provision for a green belt which offsets the heating/climate damage of the building materials and roading, and visual impact of the structures is imperative.	

Tainui Group Holdings (9)

Submission Point	Topic	Plan Change Reference	Support/Oppose	Submission Summary	Decision Requested
09.1	Intersection design (SH3/Ingram Road)	All	Oppose	There is insufficient certainty with respect to the design form concept for the staged transport infrastructure works at the SH3/Ingram Road intersection.	Not specified.
09.2	Timing & sequencing	All	Oppose	There is insufficient certainty with respect to the timing of the proposed intersection.	Not specified.
09.3	Funding of infrastructure works	All	Oppose	There is insufficient certainty with respect to funding for the SH3/Ingram Road intersection indicated as residing with Waka Kotahi and Waipa District Council	Not specified.
09.4	Traffic	All	Oppose	The Structure Plan will generate additional traffic movement demands on the SH3 corridor past the Ingram Rd intersection.	Not specified.

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09.5	Walking & cycling	All	Support with condition	The proposed walking/cycling link along the east side of SH3 linking the Northern Precinct with the Western Employment Precinct of Titanium Park appears to stop at Ingram Road and should be established to provide safe connectivity over the full length between the two precincts including either along the full length of Ingram Road or an alternative route.	Not specified.

Rex Mason (10)

Submission Point	Topic	Plan Change Reference	Support/Oppose	Submission Summary	Decision Requested
10.1	Lighting	All	Support with condition	We are keen to retain and promote 'Dark Skies' and oppose any visual darkness deterioration.	Significant restrictions are incorporated into the Plan to ensure minimal if no additional light emission/glare from buildings and or road access ways. i.e. light from both reflective sunlight and night lighting incorporating: a). Non-reflective and darkened outer claddings and non-reflective glass on buildings, b). Outdoor lighting at low level only,

Submission Point	Topic	Plan Change Reference	Support/Oppose	Submission Summary	Decision Requested
					c). Roadway lighting at low level only. d). Tall dense tree planting along Northern and Western boundaries. Include regular monitoring, measuring, and publicly reporting of the restrictions.
10.2	Noise	All	Support with condition	Noise restrictions are incorporated into the Plan.	Incorporate suitable restrictions on daytime noise emissions and incorporate curfews on night time operations and truck movements. Include regular monitoring, measuring, and publicly reporting of the restrictions.

Waikato Regional Council (11)

Submission Point	Topic	Plan Change Reference	Support/Oppose	Submission Summary	Decision Requested
11.1	Future Proof Strategy	Rule 10.4.2.11A	Not stated	More detailed assessment of the plan change is needed in relation to Topic UFD –Urban Form and Development of the WRPS, and an assessment be prepared in relation to the Proposed Change 1 -National Policy Statement on Urban Development 2020 and Future Proof Strategy update to	a. That a more detailed assessment of the proposed plan change be undertaken in relation to Topic UFD –Urban Form and Development of the WRPS and the assumptions within the Economic

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				<p>the WRPS which was notified on 18 October 2022.</p> <p>The plan change proposes a total gross floor area (GFA) of 5,000m² for non-ancillary retail activities located within the Northern Precinct under new Rule 10.4.2.11A. This is in addition to the 5,300m² of GFA for non-ancillary retail activities provided for elsewhere in the Airport Business Zone under Rule 10.4.2.11. We are concerned that this GFA is significantly higher than that required to provide for the day-to-day needs of workers within the zone and has potential to undermine the centres hierarchy within Future Proof and the WRPS due to both the total GFA proposed and the potential size of individual retail units this would allow for. The amount of GFA proposed to be available to non-ancillary retail activities also represents an inefficient use of industrial land.</p>	<p>Assessment be clarified to assist this.</p> <ul style="list-style-type: none"> b. Amend Rule 10.4.2.11A to reduce the total GFA for non-ancillary retail activities to only the level necessary to cater to the day-to-day needs of workers and people visiting the precinct for business purposes. c. That an assessment of the proposed plan change be undertaken in relation to the Proposed Change 1 - National Policy Statement on Urban Development 2020 and Future Proof Strategy update to the WRPS.

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				It is strongly recommended that the plan change comprehensively considers the out of sequence development criteria within APP13.	
11.2	High class soils	All	Not stated	The WRPS seeks to avoid a decline in the availability of high class soils for primary production due to inappropriate subdivision, use or development (LF-O5, LF-P11). The above provisions are relevant to the proposed plan change given the proposal to rezone an area of high class soils from Rural to Airport Business Zone. However, they have not been assessed within the plan change application. The application mentions that the land is currently used for low-value rural purposes, is already fragmented, and will become further fragmented by Southern Links in the future. We do not consider this to be sufficient justification for removing high class soils from productive use. The application does not clarify what is meant by 'low-value rural'	A robust assessment of the proposed plan change be undertaken against both the WRPS provisions relating to high class soils and the NPS-HPL.

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				purposes.	
11.3	Bats and bat habitat	Rule 10.4.2.14A(b), Policy 10.3.2.2A, Rule 10.4.2.14A, Rule 10.4.2.14A(a)	Support in part	<p>We strongly recommend that the provisions for bats and bat habitat are strengthened to meet the direction of the WRPS, particularly Policies ECO-P1, ECO-P2 and ECO-P3 and Method ECO-M13.</p> <p>Policy 10.3.2.2A does not prioritise avoidance, instead using “mitigate” and “where practicable, support the maintenance or enhancement of”. This wording does not give effect to the WRPS which seeks district plans require activities to avoid loss of significant habitat of indigenous fauna in preference to remediation or mitigation (ECO-P2 and ECO-M13). It also conflicts with the first part of the policy and the objective it seeks to implement (24.3.1) which set out to maintain or enhance significant long-tailed bat habitat values and the existing level of biodiversity.</p> <p>Proposed Rule 10.4.2.14A</p>	<ul style="list-style-type: none"> a. Require further assessment to inform the proposed plan change to ensure that bat habitat will be sufficiently protected, through a collaborative approach with ecologists and other relevant stakeholders involved in this process. b. Consider mapping and setting aside a corridor to be maintained as bat habitat to ensure continued connectivity across the site and with neighbouring areas. Amend Rule 10.4.2.14A(b) to require buffers around habitat areas throughout the precinct. c. Define ‘bat habitat’ within the plan provisions. d. Amend Policy 10.3.2.2A to prioritise avoidance of bat habitat removal as signalled within the plan change application.

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				<p>requires an Ecological Management Plan (EMP) to be created for the Northern Precinct which includes a Bat Management Plan (BMP), a Lighting Management Plan, and recommendations for landscape planting. While we support the requirement for an EMP, we consider the current plan wording will not sufficiently protect bats and bat habitat or give effect to the WRPS.</p> <p>It is unclear why the elements of the EMP have been separated and we are concerned this means the BMP, Lighting Management Plan and planting recommendations may not align. It is our strong preference for there to be one integrated plan that incorporates elements of a BMP, lighting plan, and planting recommendations that work in conjunction.</p> <p>Rule 10.4.2.14A(a) sets out the requirements for the BMP which</p>	<p>e. Amend Rule 10.4.2.14A to require:</p> <ul style="list-style-type: none"> i. The EMP, and its different elements, to be prepared by a suitably qualified ecologist who specialises in long-tailed bats; ii. The elements of the EMP to be prepared at the same time; iii. If each part is prepared by a different specialist, the EMP to be reviewed as a whole by a suitably qualified ecologist; and iv. The EMP to be peer reviewed by DOC and WRC ecologists. <p>f. Reword Rule 10.4.2.14A(a) to prioritise avoidance of bat habitat removal and protect all functional bat habitat areas, not just roost trees.</p>

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				<p>we consider are insufficient to ensure thorough assessment and protection of bats and bat habitat. The Assessment of Ecological Effects acknowledges that the plan change area is used for bat roosting and foraging, so it is unclear why the BMP is only required to cover roost trees. We recommend assessment needs to extend to all functional bat habitat areas.</p> <p>The Current wording of Rule 10.4.2.14A(a) is framed in a way that does not prioritise avoidance of bat habitat removal, and already implies that trees will need to be removed.</p> <p>It is unclear why Rule 10.4.2.14A(b) sets out a 20m buffer around the perimeter of the precinct but no other buffers are proposed within the structure plan area. Buffers around bat habitat areas are a useful tool to manage potential adverse effects on bats and we recommend they</p>	

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				are also considered in the EMP.	
11.4	Transport/climate change	All	Not stated	<p>There are further opportunities to effect real change in relation to integrated land use and transport planning, and the required reduction of transport emissions which are a major contributor to climate change. Embedding climate change policies and requirements into this plan change is critical to supporting the transformational change that is necessary to address the effects of climate change that is included in national and regional policy.</p> <p>We support the final row of the table within Rule 10.4.2.13A relating to walking and cycling and seek that this be retained. The construction of walking and cycling infrastructure prior to subdivision and development in the Northern Precinct will help to encourage travel behaviour that is less car-reliant and may avoid embedding the use of private motor vehicles to travel to and from a large employment centre.</p>	<ul style="list-style-type: none"> a. Consider the internal road network and connectivity between the western and eastern sides of the airport to ensure there is easy and convenient access between the two locations. b. Add new objectives, policies, rules, and standards into the plan change to address climate change and carbon emission reduction goals in the context of increased industrial activity in this location/zone. c. Add provisions referencing CPTED principles and requiring provision of end of journey facilities and EV charging facilities, either in Section 10 –Airport Business Zone or Section 16 –Transportation (or other appropriate location within the plan).

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				<p>There is no reference to climate change and the contribution that transport makes to emissions within the plan change. We suggest that new objectives, policies, rules, and standards be added into the plan to address climate change and carbon emission reduction goals in the context of increased industrial activity in this location/zone.</p> <p>We recommend references to CPTED principles be added to the plan change provisions. When implemented, these principles provide actual and perceived safety outcomes, and therefore encourage walking and cycling.</p>	

Joan & Robin Cuff with L & M McDowell (12)

Submission Point	Topic	Plan Change Reference	Support/Oppose	Submission Summary	Decision Requested
12.1	Scope of Plan Change	All	Oppose	Plan Change should be Public and include wider catchment	Make plan change public and integrate with wider catchment planning of Rukuhia Neighbourhood centre including density and timing of developments.
12.2	Visual effects	All	Oppose	Visual effects not adequately assessed to Rukuhia Neighbourhood zone	Review and consult upon issues raised with immediate neighbours.
12.3	Traffic	All	Oppose	Traffic control measure to limit traffic to Raynes Road questionable	Development shall be limited until State Highway Rd works undertaken to minimise effect of increased traffic flow on local community unless further explanation as to how traffic generation mitigation measures actually achieved.
12.4	Infrastructure	All	Oppose	Infrastructure Assessment doesn't consider nearby Neighbourhood zone which should be considered concurrently; given proximity to industrial land, national shortage of housing, the creation of jobs to enable workers to live in immediate vicinity of employment opportunities as well as maximising residential yields so to limit effect of population growth on arable land.	Integrate infrastructure planning with cross district-boundary infrastructure planning.

Submission Point	Topic	Plan Change Reference	Support/Oppose	Submission Summary	Decision Requested
12.5	Consultation	All	Oppose	Consultation completed inadequate and information not made available when contacted.	Review and consult upon issues raised with immediate neighbours.
12.6	Sequencing and timing	All	Oppose	The plan change submission refers future development rights and an extension of industrial land area towards the Neighbourhood Centre - but no assessment of effects included.	Confirm/limit future growth of Precinct alluded to in submission.
12.7	Stormwater management		Oppose	Stormwater solutions do not consider wider catchment (comprehensive stormwater) and effect of future Waka Kotahi Road works (overlay shows this will compromise proposed solution) and other developments in wider catchment.	Require specific outcomes from Waka Kotahi's new Highway works as a condition of Northern Precinct Expansion.

Riverlea Environment Society (13)

Submission Point	Topic	Plan Change Reference	Support/Oppose	Submission Summary	Decision Requested
13.1	Bat habitat	All	Oppose	We are concerned that the proposed development will further contribute to the local extinction of pekapeka-tou-roa, the long-tailed bat, which is at nationally critical risk of extinction. The ecology report by Tonkin & Taylor	Not specified.

Submission Point	Topic	Plan Change Reference	Support/Oppose	Submission Summary	Decision Requested
				is not prepared by a bat ecologist and skips over major aspects of the mitigation required. Paving over pasture, removing trees, and introducing light and noise, will comprise an enormous change to habitat used for foraging, roosting and breeding. Section 6c of the RMA requires protection of significant habitat of indigenous fauna, and this plan change will achieve the opposite.	

Titanium Park Ltd Rukuhia Properties Ltd (14)

Submission Point	Topic	Plan Change Reference	Support/Oppose	Submission Summary	Decision Requested
14.1	Bat habitat	Policy 10.3.2.2A, Rule 10.4.2.14A(a)	Support in part	The submission requests that the terminology used in the policies and rules more appropriately reflects the expected nature of the measures which will be required to manage more than minor residual effects on long-tailed bats, recognising that compensation (rather than offsetting) applies where biodiversity gains and losses are not measurable.	Amend Policy 10.3.2.2A as follows: <ul style="list-style-type: none"> Where any effects on long-tailed bats are unable to be avoided or mitigated, ensure that any more than minor residual effects are offset or compensated to achieve no net loss. Amend Rule 10.4.2.14A(a) as follows: <ul style="list-style-type: none"> Specifies best practice tree removal protocols and mitigation for any potential

Submission Point	Topic	Plan Change Reference	Support/Oppose	Submission Summary	Decision Requested
					<p>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 or compensated to achieve a no net loss outcome.</p>

Tabby Tiger Ltd (15)

Submission Point	Topic	Plan Change Reference	Support/Oppose	Submission Summary	Decision Requested
15.1	Zone extent	S10.1, S10.2, Section 10 Waipa District Plan, Section 15 Waipa District Plan, Section 21 Waipa District Plan, Planning Maps, Section 4.2 PPC, Section 10.1, Rule 10.4.2.13A, Appendix 03	Support in part	<p>The quantum of industrial zoned land proposed under Plan Change 20 is not considered sufficient to meet current and future demands for industrial land in the short to medium term. Additional land surrounding the airport is therefore required to be rezoned for this purpose.</p> <p>TTL seek that the area identified for rezoning under the Proposed Plan Change is expanded to also include additional land (including the three properties identified as 346, 356 and 356A Airport Road). Refer to Figures 2 and 3 of the submission for the land identified for inclusion.</p>	<p>In addition to supporting what is currently proposed, TTL is seeking to expand the area of land that is proposed to be rezoned from Rural to Airport Business under Plan Change 20 to also include additional land located on the eastern side of Airport Road. Specifically:</p> <ul style="list-style-type: none"> All of the land comprising the land located along the eastern side of Airport Road in the area bounded by Airport Road to the west; the State Highway 3 – Airport Road roundabout to the south, the Waikato River and the top of the western embankment of the gully system to the east; and the northern boundary of 356A Airport Road to the north) and with the possible exception of the land that is zoned Mystery Creek Events Zone (subject to the views of NZ Fieldays Society Inc. [Refer Figure 2 of the submission]) Alternatively, if the above relief sought is not granted by Council,

Submission Point	Topic	Plan Change Reference	Support/Oppose	Submission Summary	Decision Requested
					<p>and as a minimum, the properties comprising all of the land located along the eastern side of Airport Road in the area bounded by Airport Road to the west; 8 Lochiel Road and Lochiel Road to the south, 37A Lochiel Road and the Waikato River and the top of the western embankment of the gully system to the east; and the northern boundary of 356A Airport Road to the north shall be rezoned from Rural to Airport Business/Industrial. [Refer Figure 3 of the submission]. For the avoidance of doubt, this alternative relief includes the three properties identified in Figure 1 above, and located at 346, 356 and 356A Airport Road.</p>



Go Eco (16)

Submission Point	Topic	Plan Change Reference	Support/Oppose	Submission Summary	Decision Requested
16.1	Bats	All	Not stated	<p>Due to their critically endangered status, this makes the Hamilton long-tailed bat population important for national species management and conservation. This is the main reason we oppose the Proposed Private Plan Change. The proposal in its current form will not achieve section 6(c) of the RMA.</p> <p>The issues mentioned above also negatively impact most of our native species, this should also be taken into consideration with all management actions associated within this plan change.</p>	In the first instance, rejection of the plan change. Otherwise approve plan change with the comments, amendments and decisions sought as written by the Forest and Bird Waikato Branch adopted.
16.2	Climate Change	All	Not stated	By protecting and enhancing the floristic habitat through both retaining existing and increasing the planting within this area these actions will assist with mitigating climate change.	
16.3	Productive soils	All	Not stated	We support that re-zoning, subdivision or redevelopment be avoided until such time as a report to address the effect of the NPSHPL on PC20.	

Fire and Emergency New Zealand (17)

Submission Point	Topic	Plan Change Reference	Support/Oppose	Submission Summary	Decision Requested
17.1	Firefighting water supply	15.4.2.87	Oppose	<p>Fire and Emergency oppose the private plan change request given unsatisfactory levels of firefighting infrastructure in some instances. There does not appear to be a requirement in the Waipā District Plan or the proposed plan change provisions that requires subdivision and development in the Business Airport Zone to provide a firefighting water supply in accordance with SNZ PAS 4509:2008.</p> <p>Support of the plan change is possible if a satisfactory framework of provisions requiring firefighting water supply are incorporated into the plan change.</p>	<p>Fire and Emergency request that Council do not enable development within the proposed zone extension of the Airport Business Zone unless it is matched with the delivery of key water strategic infrastructure (reservoirs, network extensions or upgrades), or development is not enabled where there is potential or known infrastructure capacity constraints in relation to the water supply network (unless the development itself includes necessary upgrades).</p> <p>Fire and Emergency also seek to include the following Rule: <u>Airport Business Zone 15.4.2.87 All development and subdivision in the Airport Business Zone shall comply with:...e. Water supply for firefighting purposes, to be provided in accordance with the New Zealand Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008.Advice Note: SNZ PAS 4509:2008 New Zealand Fire Service</u></p>

Submission Point	Topic	Plan Change Reference	Support/Oppose	Submission Summary	Decision Requested
					<p><u>Firefighting Water Supplies Code of Practice sets out a number of options to provide water for the New Zealand Fire Service's operational requirements and shall be used as a guide when designing firefighting water protection.</u></p> <p>Alternatively, the reticulated water network could be designed to provide a higher level of service through the upsizing of infrastructure to either meet the likely requirements of SNZ PAS 4509:2008 for anticipated future developments or at least reduce volume of additional onsite water storage required by future developments.</p>

Waka Kotahi (18)

Submission Point	Topic	Plan Change Reference	Support/Oppose	Submission Summary	Decision Requested
18.1	Scope of assessment	All	Supports	The trip rates used are some 30% higher than would be typical for the proposed land use, a point noted within the ITA. And so, whilst this is	ication and/or commitment from the applicant is requested in relation to:

Submission Point	Topic	Plan Change Reference	Support/Oppose	Submission Summary	Decision Requested
				conservative for the purposes of assessing effects (i.e., they may be overstated), and reduces the risks on Waka Kotahi in terms of the need for unanticipated mitigations in the future, a risk that presents from this approach is if at some point in the future there is a desire to consent alternate uses, and the 'baseline' is taken from this higher assessed value. However, we consider that whilst this may raise wider issues, in terms of transport if the triggers for the infrastructure required to provide a safe and efficient use of the State Highway network are robust, this does not impact the current proposal.	<ul style="list-style-type: none"> The mechanism for funding, designing and implementing the single and dual lane roundabouts at SH21/Raynes Road as included in Table 9 Item 2 of the ITA (and subsequently proposed Rule 10.4.2.13A) and confirmation that there is sufficient land under the control of the applicant or Waka Kotahi to accommodate the roundabouts. The mechanism for funding/implementing a multilane roundabout at SH3/Raynes Road and the inclusion of such as a line in Table 9 of the ITA (and subsequently proposed Rule 10.4.2.13A); Confirming that the delivery of the SH3/GTL access is achievable within land under the control of the applicant or Waka Kotahi.
18.2	Emissions	All	Supports	PPPC20 is located close to planned and existing residential areas to the south of the city and therefore can undertake mitigation to improve its ability to reduce reliance on private car travel to and from the site. However, it is acknowledged that due to the industrial uses on the site, vehicular access will still be important and therefore the assessment of effects in the	

Submission Point	Topic	Plan Change Reference	Support/Oppose	Submission Summary	Decision Requested
				submitted ITA is considered to be suitably conservative around the impact of the proposal at intersections and the required mitigation approach.	<ul style="list-style-type: none"> The mechanism for Waka Kotahi to retain oversight and approval of the Raynes Road restricted movement access, and the retention of this as a restricted intersection into the future.
18.3	Sequencing & timing	All	Supports	In light of the form and function review being undertaken for Southern Links, and the potential for this to lead to an amended proposal to come forward, the ability or desirability to provide for this additional direct connection has not been assessed. It would seem prudent to consider this in the review, but for the purposes of the current proposal Waka Kotahi recommend that the assessment be based on a no connection future scenario.	<ul style="list-style-type: none"> Further detail on the Tamahere Intersection operation and possible mitigations to address the level of service decline. The inclusion of references to the infrastructure support for Public Transport and active mode access between the Airport Precincts within Table 9 of the ITA (and subsequently proposed Rule 10.4.2.13A);
18.4	Traffic	All	Supports	<p>State Highway 21/Raynes Road intersection:</p> <ul style="list-style-type: none"> To protect the intersection from declining safety and efficiency from increasing development related trips to and from Raynes Road, and increased through traffic on SH21, an existing MOA agreed that the Raynes 	<ul style="list-style-type: none"> Justification of the GFA quantum for non-ancillary retail activities located in the Northern Precinct.

Submission Point	Topic	Plan Change Reference	Support/Oppose	Submission Summary	Decision Requested
				<p>Rd/SH21 intersection shall be upgraded by the Airport (at that time being the Joint Venture) at such time that either delays or the injury crash rate at the intersection exceed the values identified in the MOA. It is however acknowledged that the MOA was prepared in 2010 and as such is no longer entirely fit for purpose.</p> <p>State Highway 3/Raynes Road</p> <ul style="list-style-type: none"> The roundabout is anticipated to have a single lane on the State Highway 3 approaches, and therefore not provide the capacity to allow for the additional through trips related to PPPC20. An additional line should be added to Table 9 of the ITA (as 3b) (and corresponding table in Rule 10.4.2.13A) to refer to the provision of the additional lanes by the applicant, 	

Submission Point	Topic	Plan Change Reference	Support/Oppose	Submission Summary	Decision Requested
				<p>essentially mirroring item no. 2 for SH21/Raynes Road.</p> <p>State Highway 3/Northern Precinct Spine Road (GTL)</p> <ul style="list-style-type: none"> It is unclear if the concept design can be provided within the road reserve or requires land outside of the control of the Applicant or Waka Kotahi. Clarity on this issue is required to understand the viability of the infrastructure proposals to support access for PPPC20. However, the proposals for the access have been predicted to provide the appropriate level of capacity, and also to provide layouts that we would expect to deliver appropriate safety for all users. <p>Raynes Road Access</p> <ul style="list-style-type: none"> There is the potential for increased load on the SH3/Raynes Road intersection, above that 	

Submission Point	Topic	Plan Change Reference	Support/Oppose	Submission Summary	Decision Requested
				<p>currently assessed. This could be challenging due to the land available to increase the size (capacity) of the roundabout at this location.</p> <p>Other intersections</p> <ul style="list-style-type: none"> The Tamahere interchange is the one that identifies the worst level of service according to the ITA. Some further understanding of the factors leading to this modelled queue is required, the potential diversion routes that drivers may take, and the potential to mitigate the safety risk at the north-east roundabout. Whilst a Level of Service of E is proposed at the southwest roundabout in 2031, we consider that this level of delay is not beyond that which would be expected, and unlikely to lead to a safety risk significantly above any similar roundabout. 	

Submission Point	Topic	Plan Change Reference	Support/Oppose	Submission Summary	Decision Requested
18.5	Transport (Public)	All	Supports	<p>It is expected that the ability to provide access for public transport and active modes is demonstrated, and the phasing of infrastructure is shown in the same way as that to support other vehicular traffic.</p> <p>The ITA identifies some of the opportunities that could be offered to support public transport access, and whilst this would require the collaboration of Waikato Regional Council, Waipa DC and Hamilton City Council, the applicant could assist to support and facilitate the delivery of the public transport services in several ways.</p> <p>The best mechanism to provide for this would be for inclusion of Public Transport infrastructure within the Staging of Transport Infrastructure Table 9 (and Rule 10.4.2.13A) alongside that for private vehicles. Waka Kotahi supports the provision of a public transport link via Faiping Road and Middle Road, whilst noting that this may add complexity to the construction sequencing for</p>	

Submission Point	Topic	Plan Change Reference	Support/Oppose	Submission Summary	Decision Requested
				Southern Links.	
18.6	Transport (Active)	All	Supports	<p>It is important that the infrastructure to support active mode connections both between the Northern Precinct and the other employment opportunities within PPPC20 are considered alongside that of other modes. It is noted that the upgrade of the new walking and cycling connection to Peacocke Rd is included in Rule 10.4.2.13A as a transport upgrade.</p> <p>The cycleway/walkway connections connecting the airport precincts are incorporated within the Staging of Transport Infrastructure Table 9 (and Rule 10.4.2.13A) so these are guaranteed to be constructed with appropriate timing.</p>	
18.7	Retail activities	All	Supports	<p>There is the potential for non-industrial related activities in the Airport Business Zone to compete with existing and planned retail centres in relatively close proximity within the Hamilton City urban area. It is important that the vitality of existing local centres is maintained and enhanced, and not eroded by</p>	

Submission Point	Topic	Plan Change Reference	Support/Oppose	Submission Summary	Decision Requested
				<p>out of centre activities occurring in the Northern Precinct.</p> <p>The GFA of non-ancillary retail activities located in the Northern Precinct be limited to support only the day to day needs of the work force and visitors within the plan change area to reduce the likelihood of the retail area drawing customers away from local amenities in Hamilton City, and to minimise the associated trip generation.</p>	
18.8	Construction	All	Supports	The scale of the proposed change has the potential for some construction activities to have a significant impact on the network external to the PPPC20 area. This is a concern that can be raised through subsequent Resource Consent processes, but equally given the high speed environment and relatively poor access points in their existing form, a formalisation of the need for adequate construction planning that includes Waka Kotahi would be beneficial.	
18.9	Funding	All	Supports	Construction of any infrastructure on the State Highway network is subject	

Submission Point	Topic	Plan Change Reference	Support/Oppose	Submission Summary	Decision Requested
				<p>to design review and acceptance by Waka Kotahi through the Corridor Access Request process, as well as the signing of a Developer Agreement that sets out the protocols for planning and construction. The applicant will need to allow sufficient time to enter into any Developer Agreement and work through the design details ahead of construction. Waka Kotahi is interested in how the applicant and Council will monitor the percentage of development so that there is appropriate lead in time ahead of triggers for infrastructure being met. It is again noted that Waka Kotahi has no discretionary budget for the proposed infrastructure, including detailed design.</p>	

Katherine Hay - Royal Forest and Bird Society (Waikato Branch) (19)

Submission Point	Topic	Plan Change Reference	Support/Oppose	Submission Summary	Decision Requested
19.1	Bats	All	Oppose	The Assessment of Ecological Effects for bats is inadequate. For example, its findings focus on mature trees and shelters belts, without addressing the use of the site by bats for foraging and commuting. It does not appear that bat surveys were done during the breeding season of December/January or that adequate surveys were done on the Rukuhia Properties Limited property. We believe it is likely that bats may roost in neighbouring properties and use the affected area as foraging grounds. A wider landscape approach to the assessment of impacts on bats is needed. We strongly believe that a more comprehensive assessment is needed to determine the true impact on bats of this plan change.	Decline the application in its current form.
19.2	Productive soils	All	Oppose	The National Policy Statement for Highly Productive Land (NPS-HPL) is now in effect to protect highly productive land for use in primary production. The proposed plan change needs to consider and address the relevant objectives, policies, and methods of the NPS-HPL. The Waikato Regional Policy Statement	

Submission Point	Topic	Plan Change Reference	Support/Oppose	Submission Summary	Decision Requested
				also has provisions related to soils that do not seem to have been considered in the proposal.	
19.3	Climate change	All	Oppose	We found no reference to climate change or transport emissions within the plan change. Surely, if increased industrial activity is being facilitated by this plan change it should include provisions to address climate change and carbon emission reduction goals. New Zealand must include climate change in all policy documents or plan changes to help achieve the transformational changes necessary to avoid climate disaster.	

Department of Conservation (20)

Submission Point	Topic	Plan Change Reference	Support/Oppose	Submission Summary	Decision Requested
20.1	Bats and habitat	10.2.5, Policy 10.3.2.2A, Appendix 18, Planning Map 19, Planning Map 49,	Support in part	Protection of long-tailed bats and their habitat is a core resource management issue to be recognised and provided for in PC20. The Director-General considers that any separate policy should focus on	Insert the following or words to the like effect: <u>Protection of long-tailed bats and their habitat 10.2.5 Development within the Airport Business Zone has the potential to adversely affect the</u>

Submission Point	Topic	Plan Change Reference	Support/Oppose	Submission Summary	Decision Requested
		Appendix N5.		<p>the maintenance, restoration, and enhancement of functional habitat for bats. The consequential provisions, and identification of significant habitat in planning maps, including the Airport Business Zone Structure Plan and Northern Precinct Map should implement 24.3.1.1, and/or the revised Policy 10.3.2.2A recommended by the Director-General.</p> <p>Will be necessary to spatially identify and protect all roosting and foraging sites within the PC20 site and set aside additional areas of land for the movement of bats so that their core habitat remains functional and does not lose its significance.</p> <p>Mapping should occur through a collaborative approach with ecologists and other relevant stakeholders involved in accordance with WRPS Policy ECO-P3.</p> <p>There is also limited consideration</p>	<p><u>habitat and survival of the threatened, nationally critical long-tailed bat.</u></p> <p><u>The relevant provisions must recognise and provide for the identification and protection of significant bat habitat, in addition consideration must be given to (but not limited to) the potential impact of lighting effects, noise and habitat loss on long-tailed bats.</u></p> <p>Delete: proposed policy 10.3.2.2A and reference Policy 24.3.1.1 Maintenance and enhancement of indigenous biodiversity in Section 10 –Airport Business Zone.</p> <p>If a new policy is considered necessary, the following or wording to like effect is requested:</p> <p><u>10.3.2.2A To achieve maintenance, restoration and enhancement of bat habitat in the Northern Precinct by:</u> <u>a) Linking core bat habitat with corridors of natural open space b) Buffering sensitive sites such as bat</u></p>

Submission Point	Topic	Plan Change Reference	Support/Oppose	Submission Summary	Decision Requested
				of integrated management and how PC20 applies the Future Proof Strategy 2022 and no consideration of the Waikato Bat Alliance Strategy.	<p><u>habitat and corridors from intensive land use, development and subdivision. c)Ensuring habitat for at-risk and threatened indigenous species is maintained, restored and enhanced.</u></p> <p>Amend Appendix 18 Titanium Park Airport Urban Business Zone Proposed Structure Plan (northern Precinct) Map to show SNA overlay and areas of reserve zoning, set aside as commuting habitat for bats.</p> <p>Amend Planning Map 19 to show bat habitat SNAs within the operative Airport Business Zone and Possible Future Airport Growth Area.</p> <p>Amend Planning Map 49 to show bat habitat SNAs within the operative Airport Business Zone and Possible Airport Future Growth Area.</p> <p>Amend Appendix N5 to add the additional SNAs.</p>
20.2	Lighting	10.4.2.14A	Support in part	Lighting Management Plan (LMP)	Insert wording in Section 10 Airport

Submission Point	Topic	Plan Change Reference	Support/Oppose	Submission Summary	Decision Requested
				<p>defers protection of significant bat habitat to the consent application stage, with no certainty as to how development will avoid, remedy and mitigate adverse ecological effects as is required by the higher order policy instruments and the RMA.</p> <p>Bespoke provisions, including performance standards are required for the management of lighting effects on bats. The spatial extent of the “lighting management plan area”, 20m buffer and deferment of lighting effects management to the LMP are considered insufficient to avoid, remedy or mitigate potential lighting effects on bats.</p>	<p>Business Zone to explain that the rules in 24.4., including 24.4.1 – Activity Status Table, will apply.</p> <p>For activities that will be proposed outside of SNAs or Bat Habitat Corridors, Rule 10.4.2.14A is still required. The Director-General seeks amendments to Rule 10.4.2.14A to ensure the EMP (and BMP, LMP contained therein):</p> <ul style="list-style-type: none"> • Have an objective specified in the PC20 provisions against which its effectiveness can be measured. • Extend beyond roosting sites and manage effects on foraging and commuting sites to protect the functionality of core bat habitat. • The Ecology, Bat and Lighting management plan be prepared by the same suitably qualified ecologist/s to ensure they integrate to achieve the specified objective.

Submission Point	Topic	Plan Change Reference	Support/Oppose	Submission Summary	Decision Requested
					<ul style="list-style-type: none"> • The Ecology, Bat and Lighting management plan be peer reviewed by DOC and WRC ecologists. • Consider roosting tree removal as a last resort but include best practice tree removal protocols and mitigation for any potential trees that have been identified for removal. • Set out how protected, restored or enhanced habitat will link to other areas immediately outside of the PC20 site. It is important that connectivity to the wider landscape is accounted for. <p>Insert the following or wording to like effect: <u>Bespoke provisions to manage lighting effects on bats across the proposed Airport Business Zone. Performance standards should include, at minimum, a requirement that light (lux) levels will not exceed 0.1 lux at the boundary of any area</u></p>

Submission Point	Topic	Plan Change Reference	Support/Oppose	Submission Summary	Decision Requested
					<p><u>set aside for bat protection, including any such SNAs and/or corridor, as recommended in the Eurobats Guidelines for consideration of bat in lighting projects.</u></p> <p><u>Performance standards should manage colour temperature, directing that fixed lighting in the Airport Business Zone will be white and not exceed 2700 kelvins with as little blue light as possible. All lighting should emit zero upward light, be installed with the light emitting surface directly down and be mounted as low as practical.</u></p> <p>The D-G requests other lighting effects mitigation such as low-reflectance surfaces, light trespass from windows, luminous intensity, luminance, screening from vehicle headlights, and flicker also be addressed in provisions.</p>
20.3	Environmental offsetting	All	Support in part	The principles for biodiversity offsetting and biodiversity compensation in Appendices 3 and 4 of the NPSIB exposure draft are	Insert a method to ensure proposals for biodiversity offsetting and biodiversity compensation are in accordance with appropriate

Submission Point	Topic	Plan Change Reference	Support/Oppose	Submission Summary	Decision Requested
				<p>reflective of the Business and Biodiversity Offsets Programme (BBOP), similar guidance for aquatic ecosystems in the NPS-FM2020 and the Local Government Biodiversity Offsetting Guidance document.</p> <p>As the management plan approach proposed in PC20 may require the management of significant residual effects inclusion of biodiversity offsetting and compensation guidance is considered necessary.</p> <p>If financial contributions are necessary to fund any biodiversity offsetting or compensation this should be clearly signalled through a transparent planning framework, in PC20 provisions, as required under section 77E of the RMA.</p>	<p>criteria, such as the principles in appendices 3 and 4 of the NPSIB exposure draft.</p>

New Zealand National Fieldays Society Inc (21)

Submission Point	Topic	Plan Change Reference	Support/Oppose	Submission Summary	Decision Requested
21.1	Traffic	Section 10 Objectives and Policies	Support in part	<p>The roading infrastructure in the area needs to be upgraded to not only support the expansion of the Airport Business Zone, but also the existing and ongoing activities associated with the Mystery Creek Events Centre.</p> <p>The inclusion of these polices will further ensure that future developments need to take to account and avoid/mitigate any potential adverse effects of the functionality of NZNFS.</p>	<p>The objectives and policies listed in Section 10 –Airport Business Zone be amended and propose the following policies to be included:</p> <p>1) “Future industrial development shall take into account the existing operation and functionality of the Mystery Creek Events Centre. Any potential adverse effects on the existing and future operation of the Mystery Creek Events Centre shall be avoided”.</p> <p>2) “Future development of the Northern Precinct cannot adversely impact on the safety and functionality of the existing roading infrastructure.”</p> <p>This proposed Polices will fall under the wider objective relating to the envelopment of the Northern Precinct.</p>
21.2	Transport	Appendix 18 Structure Plan	Support in part	<p>Public transportation infrastructure is a key component to ensuring the sustainability of the surrounding area and the existing and proposed activities and business that operate out of them.</p>	<p>The Structure Plan should be amended to provide for all forms of transport, which particular regards to public transportation such as bus and potential light rail.</p>

Christopher Hickey (22)

Submission Point	Topic	Plan Change Reference	Support/Oppose	Submission Summary	Decision Requested
22.1	Water quality	All	Oppose	Sewage and industrial waste disposal. Our drinking water supply for our dwelling is from groundwater. The aquifer supplying our house is in the likely downstream area for this industrial development. The very large number of proposed industrial sites will be highly likely to contaminate groundwater and surface waters with chemicals and microbial contaminants unless full reticulated treatment systems are in place. Surface waters are also at very high risk from untreated stormwater runoff.	Only undertake development if fully reticulated wastewater and stormwater treatment systems can be provided.
22.2	Traffic	All	Oppose	Traffic density. (i) Raynes Road currently has no walking paths or safe provision for cycle use. The suitability for recreational use will be greatly reduced with traffic density increases associated with this proposed development. (ii) Peak time traffic density will also challenge the current roading infrastructure for access to local highways. The intersections and road widening will need to be improved.	Only undertake development if Cycle and walkways are provided along Raynes Road and Airport Road to connect with Hamilton/Cambridge cycleways. Improved roading infrastructure for local highway access.

Submission Point	Topic	Plan Change Reference	Support/Oppose	Submission Summary	Decision Requested
22.3	Lighting	All	Oppose	Ecologically sensitive lighting needs to be used to minimise adverse effects on birds, bats and aquatic/terrestrial insects.	Only undertake development if Low impact lighting systems are included

Hamilton City Council (23)

Submission Point	Topic	Plan Change Reference	Support/Oppose	Submission Summary	Decision Requested
23.1	Sequencing and timing	All	Support in part	Full or staged delivery of Southern Links is a key enabler for future expansion of the Airport Precinct. Without this new corridor being fully constructed the local road networks performance may be compromised through additional demand created by the Northern Precinct build-out	<ul style="list-style-type: none"> • Re-modelling is undertaken to update the baseline based on current demand and various scenarios are run based on different land-use activities within Northern Precinct. • Confirm if modelling takes account of the build-out of Peacocke (Plan Change 5) • Based on revised modelling scenarios, re-consider plan change triggers, based on Northern Precinct build-out relative to Sothern Links construction.

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23.2	Transport (Walking & Cycling Connectivity)	All	Support in part	<p>Proposed new walking and cycling shared path connecting Peacocke Road to the Northern Precinct via Middle Road and Faiping Road</p> <p>Providing a new walking and cycling facility along Faiping Road does not align with HCC future plans for this area. We are also unclear how this would be funded and delivered.</p> <p>The grades on Faiping Road may mean that cycling is not attractive for commuter cyclists.</p> <p>Section 5.6 of ITA states that the shared path should be 3m wide for the full length to cater for e-bike speeds. However, this is not included in the provision table.</p> <p>There is limited evidence to suggest the level of demand/patronage would support the investment required for this type of solution, in the short-term, prior to the construction of southern links. An on-demand PT service is likely to be more practical short-term solution.</p>	<ul style="list-style-type: none"> Walking and cycling connection should be continuous to urban centre within Peacocke or delayed until there is a safe connection along Peacocke Road. We seek clarity regarding how a walking cycling solution would be funded and delivered. There may be scope to provide an alternative connection to Faiping Road with the use of the watercourse buffers or alternatively provide a connection from Narrows Road through to Peacocke Road parallel to the Southern links designation (refer to Appendix 3). This route assumes that in the interim the route will also be used as a recreational route prior to development in Peacockes. Further investigation is

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				Data showing where the future labour force might reside would help inform where and what type of PT and walking/cycling solution is required – determining the origin of trip destination of employees to the Northern Precinct is critical.	<p>required. HCC is open to working with the proposed plan change proponent and Waipa District Council on a solution if this option is deemed viable.</p> <ul style="list-style-type: none"> Travel demand analysis is undertaken to understand likely origin of employee trips to the Northern Precinct from across the sub-region in order to inform the required PT and walking-cycling interventions.
23.3	Transport (Public)	All	Support in part	<p>Short Term:</p> <ul style="list-style-type: none"> Provision for bus stops both sides of SH 3. However, no details of crossing facilities and paths to accommodate pedestrians walking to and from the bus stops to the site are provided. Provision for future bus route serving the Peacocke Structure Plan Area into Raynes Road to the Airport and Titanium Park precincts then back to Hamilton via SH3. This service may not be 	<ul style="list-style-type: none"> Provisions table or PDA needs to specify footpath connection and form of SH3 crossing. Need to provide safe crossing facility on SH3 to support proposed bus stops. May need to review speed limit if pedestrians are crossing SH 3. Confirm what public transport infrastructure will be provided within the internal road network to

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				<p>attractive if it is not direct for commuters.</p> <p>Medium Term:</p> <ul style="list-style-type: none"> Public transport service connecting Hamilton via SH3 and Ohaupo Road to the Airport and surrounding Airport Business Zone. A potential future service serving the Peacocke Structure Plan Area and Airport/Titanium Park precincts via Peacocke Road, Faiping Road and Middle Road Investigation of Faiping Road for public transport. <p>Long Term:</p> <ul style="list-style-type: none"> Use of Southern Links corridor for a public transport connection to the Airport New strategic road connection to the central interchange. 	<p>encourage mode shift in the short term. For example, will bus stops and shelters be provided when the internal roads are constructed?</p> <ul style="list-style-type: none"> Make provision for a primary PT node within the Hub and ensure planning provisions require built form is designed to support use. Consider alternative routes if Faiping Road cannot be used. Provisions table or PDA needs to specify infrastructure required to facilitate the medium-term option Provisions table or PDA needs to specify infrastructure required to facilitate the long-term option
23.4	Transport (Layout)	All	Support in part	Hamilton City Council seek to ensure a safe and efficient transport network in and around the Airport precinct which also takes account of planned growth within the wider catchment. Specific	<ul style="list-style-type: none"> Further information and comment are sought in relation to these matters, or consideration of alternative

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				<p>comment is made in the submission about issues in the following locations:</p> <ul style="list-style-type: none"> • Ingram Road • Raynes Road • Proposed Northern Precinct/Raynes Road intersection • Future connection to Realigned Raynes Road/Narrows Road Intersection • Raynes Road/SH21 Intersection • SH3/ Northern Precinct Roundabout • Future Connection to Southern Links • Peacockes Road • SH 3/Raynes Road Roundabout • SH3/Normandy Avenue Intersection • SH3/Saxbys/Tomin Intersection • Ohaupo Road • Trip Generation Assessment • Internal road Layout • Spine (Primary) Road Cross Sections • Local (Secondary) Road Cross Sections • Internal Walking and Cycling Provisions 	<p>solutions to the issues raised in the submission. [Refer to the original submission attachments for specific comments].</p>

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				<ul style="list-style-type: none"> • Staging • Narrows Bridge • Airport Road (SH21) <p>[Refer to the original submission attachments for specific comments].</p>	
23.5	Retail activities	All	Support in part	<ul style="list-style-type: none"> • The plan change area and wider Airport node is of significant strategic importance regionally. • The composition of industrial activities must be complementary to the airside and aeronautical related activities. • The industrial activities which occur in the PC20 area must be complementary to one-another • Due to the proximity of Hamilton Airport to Hamilton City’s urban area, there is a high degree of co-dependence an interrelationship of land-use activities and functions. • Retail activities occurring in the Airport Business zone for non-industrial related purposes 	<ul style="list-style-type: none"> • Develop Airport specific plan provisions through a precinct plan approach or other planning method to control activities to ensure only high-value and high amenity industrial activities are enabled such as logistics, specialised manufacturing and airside related activities. • Prevent “dirty industrial” activities from occurring. • Consider provisions related to setbacks, building height, landscaping, hard-stand quantum’s and internal site layout to ensure only high-value industrial activities occur and visual amenity is enhanced • Residential and accommodation related activities are ‘non-complying’.

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					<ul style="list-style-type: none"> • Ancillary retail activity shall not occupy more than 10% of GFA of the principal activity on the site. • Office activities are ‘non-complying’ and ancillary offices are capped and/or controlled. • The quantum of retail activities are capped to support only the day to day needs to the work force and visitors within the plan change area. • Limit maximum GFA in the northern precinct to a quantum which is commensurate with the local demand created by the day-to-day industrial activities as part of the PC20 • To justify the GFA quantum, a centres assessment and demand analysis is undertaken based on the profile of industrial activities which are likely to locate in the Northern Precinct and

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					<p>the number of employees who are likely to be working there.</p> <ul style="list-style-type: none"> • Update on how much retail GFA has been consented already out of the 5,300 in the Airport Business Zone • Stage to retail development to ensure it is appropriately sequenced with the stages of the industrial development so local services and amenity are available from an early stage • Ensure retail activities enabled are proportionate to the quantum of employment activities.
23.6	Airside activities	All	Support in part	<ul style="list-style-type: none"> • There are no provisions which safeguard airside activities along the edge of the plan change area bordering the runway. • We understand WRAL intend of retaining ownership as a mechanism to safeguard this land 	An overlay method to control/safeguard land bordering the runway and the main spine road for airside activities.
23.7	Extent of Plan Change	All	Support in part	<ul style="list-style-type: none"> • Based on the current proposed PC20 extent if accepted, an area of rural zoned land becomes 'land-locked' by Southern Links. This area includes 	<ul style="list-style-type: none"> • The properties identified in Appendix 4 as part of the Proposal Plan Change be included in the process.

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				19 lifestyle blocks and covers approximately 42,3ha of land.	<ul style="list-style-type: none"> Inclusion of this area would achieve a range of beneficial outcomes including enabling integrated master planning to occur with a roading pattern that responds accordingly which will provide certainty to nearby property owners of the future uses. Planning methods, such as an overlay, deferred zoning or staging with triggers be considered for the area of land labelled 'Northern Precinct B' in Appendix 4. Overcome accessibility issues in future into the rural area at the point when a change in zoning does occur. Avoid reverse sensitivity issues. Provide a natural defensible boundary.
23.8	Amenity	All	Support in part	<p>In order to attract and retain high-value businesses to this precinct, the amenity of the public and private realm is critical.</p> <p>It is important that the retail area and</p>	<ul style="list-style-type: none"> Ensure generous setbacks of built form from road corridors, ensure landscaping treatment occurs within these setbacks

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				<p>Hub is restricted to service only the needs of the day-to-day visitors of the precinct and does not generate/induce out of centre demand. These retail nodes within the precinct are an attractive destination for those working within the precinct in order to avoid out of centre trips occurring.</p>	<ul style="list-style-type: none"> • Limit vehicular access from main spine roads • Introduce precinct specific design controls to direct landscaping, signage, internal site layout etc • Ensure land is set aside at the key gateways to the site for signage and landscaping • Introduce a masterplan with design specific controls and principles, with associated assessment criteria for the retail area and the Hub. Ensure visual contrast between industrial built form and these two proposed retail centres. • Undertake more in-depth economic analysis to determine the appropriate size of the retail centre and Hub (gross ha and GFA) – limit the total site area and GFA of both these areas accordingly in the plan provisions.

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23.9	Wastewater	All	Support in part	The Northern Precinct must be serviced by a public wastewater solution	<ul style="list-style-type: none"> Strengthen the plan provisions regarding requiring a
23.10	Bats and habitat	All	Support in part	<p>The need for a coordinated regional approach to bat and bat habitat protection was recently highlighted through the resource consent process for the Amberfield development in Peacocke, and the recent Hamilton City Council Peacocke Plan Change 5 – Peacocke Structure Plan. Both processes emphasised the need to work more collaboratively and develop a unified approach to protecting bat habitat at a landscape scale.</p> <p>Hamilton City Council supports the Airport Plan Change, including measures that require an appropriate consideration of bat habitat protection, restoration and enhancement to assist in ensuring the continued presence of the Long-Tailed Bat in the area. This may include biodiversity mitigation, offset or compensation to address the loss of bat habitat.</p>	<p>Bat mitigation measures be aligned to those planned for in Peacocke:</p> <p>Identification of the key bat habitats within and adjacent to the proposed urban areas and an understanding of how bats utilize those habitats.</p> <p>Adopting cross-discipline mechanisms and performance standards in urban design and construction to address direct and indirect effects on bat habitats.</p> <p>Implementation of vegetation removal protocols and strategies to avoid or mitigate adverse effect of the loss of trees for bats.</p> <p>Creation of ‘bat buffer zones’ adjacent to key habitats, at least 20m wide with a 5m set back from buildings.</p>

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					Performance standards relating to artificial lighting and the design, composition, density and height of vegetation needed to create bat habitats, buffers and corridors.
23.11	Stormwater	All	Support in part	Te Ture Whaimana is the primary direction setting document of the Waikato. As such, HCC support the inclusion of low impact urban design principles into this plan change which support the health and wellbeing of the Waikato River, its tributaries and catchment.	Planning provisions which manage the effects of stormwater and wastewater on the Waikato River and give effect to Te Ture Whaimana.

Salvador & Maryline Morales (24)

Submission Point	Topic	Plan Change Reference	Support/Oppose	Submission Summary	Decision Requested
24.1	Zone extent	Zoning map	Support in part	Between the proposed new road and the proposed zone extension and Narrows road, there are some lands left as residential life-style or farming, which does not make sense to me. It should be all included in the proposed zone extension.	I would like the extension of the proposed zone extension include my land at 114 Narrows road.

GHA (Gerry) Kessels (25)

Submission Point	Topic	Plan Change Reference	Support/Oppose	Submission Summary	Decision Requested
25.1	Bats and habitat	All	Oppose	The proposed plan provisions do not adequately mitigate offset or compensate for the loss of all bat habitats, including foraging and commuting habitats. The proposed plan provisions also do not provide enough specificity to ensure that the cumulative effects of land use change don't adversely affect bat habitats, including artificial lighting and commuting flyways.	Amend provisions of the proposed plan change to adequately mitigate offset or compensate for the loss of all bat habitats, including foraging and commuting habitats, as well as cumulative effects on bat habitats within the locality.

Waikato Regional Economic Development Agency (26)

Submission Point	Topic	Plan Change Reference	Support/Oppose	Submission Summary	Decision Requested
26.1	Land supply	All	Support	The request will expand an existing urbanised area and will enable agglomeration benefits to occur which arise by increasing economic activities to cluster together. This clustering of economic activity can help to reduce transport costs and lift the average productivity of firms (for example through sharing of labour, specialised assets, and ideas).	The Proposed Private Plan Change 20 be approved.

