

Technical Memo

NORTHERN PRECINCT PPC20



Feedback from Waipa DC

TPL & RPL

TO: Nick Williamson, Waipa District Council
FROM: Nick Grala

HG PROJECT NO : A2000079.00
DATE: 20 July 2022

Thank you for your feedback on the Northern Precinct Private Plan Change Request (PPC20) that we lodged on behalf of Titanium Park Limited (TPL) and Rukuhia Properties Limited (RPL). We recently requested PPC20 be placed on hold while we awaited the Cultural Impact Assessment and updated Ecology Report. We now have these two reports and resubmit PPC20 with these documents included as well as updated versions of the:

- Plan Change Request and Assessment of Environmental Effects
- Integrated Transport Assessment;
- Infrastructure Assessment; and
- Section 32 Evaluation and Proposed plan Provisions.

These reports have also been updated to reflect your feedback as well as the Cultural Impact Assessment and updated Ecology Report. We also provided the following responses to your feedback. The processing of PPC20 can now be resumed.

ITEM	CATEGORY	WDC COMMENT / FEEDBACK	RESPONSE
1	Stormwater	To manage stormwater from the development of the precinct you will likely require Regional Council consent at the implementation stage. If in due course the SW management is to be incorporated in the Council's comprehensive consent the installation should be consistent with Councils comprehensive consent renewal to be submitted in July 22 and the associated Operation & Maintenance provisions (i.e., no novel devices or O&M practices).	We acknowledge that resource consent is likely to be required from Waikato Regional Council. Our stormwater management approach to the Northern Precinct does not include any novel devices that would need to be vested.
2	Stormwater	Correspondingly, where the airport operations include restrictions, the extent to which these would this limit future O&M also?	The presence of the Airport does not expressly preclude any stormwater devices, but it is something that needs to be managed to maintain aeronautical safety. The proposed stormwater management approach ensures that all devices/systems needing maintenance would be in accessible public road corridors or have access easements provided.

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3	Stormwater	As the solution is heavily reliant on soakage devices for initial storm events, we would look for the developer to operate and maintain these devices in the initial years and especially during building activities. Council has had significant sediment issues on soakage devices previously post vesting to Council.	Noted and we also note that a three-year maintenance period (for similar reasons of protection from sediment) is common on projects.
4	Stormwater	We assume that the various technical studies have been reviewed internally on your side to confirm the discharge will not cause erosion or have detrimental effect on present stream ecology.	Yes, this assumption is correct. The details will be refined later in the process but as a minimum the design will ensure that predevelopment stormwater flows from the site are not exceeded. With soakage to ground, there would be less SW runoff leaving the site for up to a 1 in 10 year storm which would reduce likelihood of erosion from these storms.
5	Stormwater	We also assume that the combined soakage effect on groundwater of SW and WW has been considered	Any wastewater and stormwater soakage areas will be appropriately separated, with setbacks provided as needed to avoid conflict. Any land-based WW disposal system would be at or near ground level and would be mostly through transpiration, whereas SW soakage at the bottom of the swales would be ~1m below ground level. This provides both vertical and horizontal separation between systems
6	Water Supply	There is an agreement between Titanium and Waipa DC regarding water supply which requires Titanium to fund infrastructure upgrades in Council's Pukerimu scheme (reticulation not treatment plant) once certain triggers are exceeded. Such upgrades would take a period to implement and wouldn't be available immediately, so it would be necessary to understand how the existing agreement would be impacted by this proposal, and what changes would be required.	We agree that upgrades will be needed to enable the full development of the precinct. The timing of the upgrades would depend on the timing of the industrial users getting established and the speed to which the precinct is developed. TPL and RPL will continue to engage with Waipa DC to inform the speed of uptake and to identify the required lead-in time to complete the upgrade works.
7	Water Supply	The predicted water usage rate is much less than RITs requirements, so can you give an indication of how present and future water demand will be limited, i.e. zone rules or other methods such as covenants?	The design assumptions in the report are based upon the current usage rates recorded on the occupied industrial sites in other precincts within the Airport Business Zone (dry industry only). Options would be to: 1. Include covenants to limit water supply/usage per lot, based on area (such that the currently agreed supply limit of 600m ³ /d isn't exceeded). Usage would be monitored and any users needing more water would have to utilise

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			<p>rainwater collection tanks to supplement supply; or</p> <p>2. TPL and RPL liaise with Waipa DC for an increased supply. The report notes that 800m³/d could be supplied by Waipa DC, and that would be sufficient to meet RITS standards.</p>
8	Wastewater	It is noted that you already have regional consent for wastewater disposal for the precinct	The existing consent noted in report is for the Southern and Central Precinct only, not the Northern Precinct (and was noted in the report simply as part of 'setting the scene').
9	Wastewater	Is our understanding correct, that the package plant system can deal with stages 1 and 2 of development? The sequencing and timing of these stages relative to expectations on when a sub-regional plant would be available will require some further consideration	<p>As per answer to Item 8 above, the Stages 1 & 2 referred to are related to the Southern and Central Precinct only, and are not directly relevant to the Northern Precinct (and was noted in the report simply as part of 'setting the scene').</p> <p>In terms of the Northern Precinct the use of a package plant and treatment beds on the Northern Precinct would be a matter of timing (in relation to when it was needed compared to the availability of the sub-regional plant).</p> <p>We have revised the Infrastructure Report to make it clear that the preferred option (Plan A) is to connect to the planned sub-regional plant once available, and in the interim period to utilise a low pressure wastewater system discharging to a central collection chamber. From here the untreated flows from the chamber would be collected and trucked to the Cambridge WWTP. The central collection chamber then reverts to a WWPS to pump flows to the sub-regional plant (when available).</p> <p>We have made it clear that the alternative scenario (or Plan B) is in case of significant delay (or complete abandonment) of the provision of a sub-regional plant. This alternative would be to provide the central WW collection chamber with a privately owned package plant and disposal bed area (this would require allocation of ~1ha of land for the purposes.)</p>

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			We expect that details around likely timing of the sub-regional plant will be clearer once the final business case is released and as discussions with TPL, RPL and Waipa DC progress.
10	Wastewater	We assume the developer would operate and maintain the package plant system and associated disposal fields (especially if they are next to the runway and free access cannot be ensured). If the developer is looking for Council to operate the package plants (there is apparently a letter in place where Council agreed to do so?) then there would be several detail technical requirements we would require associated with access, designation, odour, layout etc.	Further to the response to Item 9, TPL and RPL operating and maintaining the treatment plant and disposal beds (if utilised as Plan B) would be an option. The alternative option (if Plan B is needed) is the system becomes vested to Waipa DC and they take ownership and O & M responsibilities. In that scenario any land related to the treatment plant and disposal beds would need legal access for maintenance granted to Waipa DC by means of an easement.
11	Wastewater	Note the sub-regional MOU that Waipa is about to sign has minimum treated effluent standards for land disposal which any plant vested in Council would need to comply with or exceed irrespective of any regional consent.	The package treatment plant size noted in the report has been indicatively sized based on it achieving the same design requirements that related to the Central Precinct. If the plant and beds were to vest to Waipa DC, and this necessitated meeting higher standards, then adjustment to the spec of the treatment plant or increase in size of the disposal fields would be straight forward and achievable given the availability of land within the airport. Please provide a copy of the MoU so we are able to review and understand any implications.
12	Wastewater	It is suggested that the package plant system can be reconfigured such that it can pump to the new southern wastewater treatment plant in the future. The process and mechanism proposed for achieving this will require some further consideration.	Yes, we believe this is clearly noted in the report. In this scenario the main WW central collection chamber would continue to operate for collection and disposal, whilst the WWPS (and associated emergency storage chambers etc) was constructed. On completion of the WWPS the collection chamber would revert to being the Terminal Manhole for the WWPS.
13	Wastewater	Similar to water supply, how will you ensure that land development within the precinct will not exceed the design capacity and assumptions of the package treatment system? There is no obvious and explicit mention of dry industry only that we can see	At present the design assumptions in the report are based on the same assumptions of dry industry only and are in line with RITS requirements. (Refer also to Item 7.)

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14	Development Contributions / Funding / Financial Contributions	A review of the present water supply trigger levels and financial contributions will be necessary due to the time that has elapsed since they were set up. For instance, contract rates have substantially increased since the agreement was first entered into	Noted. Such matters can be explored between TPL and the asset team at Waipa District Council as part of negotiating any variation to the existing agreement or new agreement for future arrangements. It is further noted that TPL and RPL do not favour the use of financial contributions under the RMA and consider the provision of infrastructure can be more effectively dealt with through a Development Agreement and Development Contributions, if needed.
15	Development Contributions / Funding / Financial Contributions	The installation of a package wastewater plant solution would generally require a bespoke wastewater rating regime (on the assumption that it is vested in Council). The rate is likely to be substantive to reflect location and need to tanker sludge to Cambridge (unless an alternative funding or contribution regime is in place). It may also be necessary to explore the options for contribution towards the sub-regional wastewater plant. Waipa will be contributing to land purchase and build of the new plant to make it available for use by the airport, so the short- and medium-term solutions may require different funding regimes).	Refer our responses above in relation to the preferred wastewater solution and the intent to enter into a Development Agreement.
16	Development Contributions / Funding / Financial Contributions	The relative merits of the short- and medium-term solutions (such as the ability to leverage a one-off early contribution to the new treatment plant) require a bit more clarity. Waipa is expecting any costs for the new treatment plant are carried by the airport and associated industrial growth that will benefit from it without rates supplement	Refer our responses above in relation to the preferred wastewater solution and the intent to enter into a Development Agreement.
17	Development Contributions / Funding / Financial Contributions	The level of DC will be related to the suggested water use and wastewater generation therefore there need to be certainty that these won't be exceeded	Refer our responses above in relation to the preferred wastewater solution and the intent to enter into a Development Agreement.
18	Development Contributions / Funding / Financial Contributions	Once the sub-regional plant is built provision needs to be made for the cost of reconfiguring the system and install reticulation to the new treatment plant location. It is Waipa DC's view that this should be borne by the developer as a cost of developing the precinct ahead of the sub-regional solution.	Refer our responses above in relation to the preferred wastewater solution and the intent to enter into a Development Agreement.
19	Development Contributions / Funding / Financial Contributions	The Council is preparing a plan change (PC26) to the Financial Contributions in Section 18 of the District Plan to give effect to the RMA s77T changes resulting from the Housing Supply Amendment Act. As discussed previously, further consideration	We do not consider that financial contributions should be used for PPC20 as a Development Agreement and Development Contributions (as required) under the LGA is more effective and preferred.

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		<p>should be given to whether the infrastructure funding for PPC20 could use these provisions instead of (or in addition to) the LGA DC provisions (including developer agreements).</p>	
20	Planning / District Plan Mechanics	<p>Most of the 'triggers' and design parameters for the Precinct are contained in Appendix S10. Recognising that you have tried to keep changes to the district-wide provisions to a minimum for reasons of scope, there have been relatively few changes to Section 10 (Airport Business Zone) and Section 15 (Infrastructure, Hazards, Development and Subdivision). The approach has been to cross reference those primary chapters back to Appendix S10. As a result, subdivision is either controlled (where in accordance with the Structure Plan) or discretionary where it is not, with matters of control and assessment criteria being the degree of conformity with the Structure Plan.</p> <p>The difficulty with this approach is that subdivision and development 'in accordance with' the structure plan requires a higher level of certainty (given that this triggers a change in activity status) that it presently has. The 'preamble' in S10 (at S10.2) contains the road upgrade triggers, but these have no clear statutory context in terms of the RMA consenting process. Same goes for the S10.3 Principles – they are not issues, objectives, policies, or rules in that sense.</p> <p>This method can work well for subjective aspects (such as urban design or even form and layout of infrastructure), but is not well suited to rules, particularly where the delineation between activity status requires an absence of any subjectivity. Instead, we suggest that any critical 'triggers' or other fundamental design pre-requisites be relocated to Chapters 10 and 15 as appropriate (or even both). This does not necessarily require them to be at the same 'top-level' as the existing policy provisions in those chapters - they can be subordinate (precinct specific) in those chapters.</p> <p>As a matter of principle, and for ease of interpretation and administration of the plan, it should be clear which aspects (triggers and design parameters) of the structure plan are fundamental its approval, and which are to achieve quality outcomes. The former should be encapsulated in the policies, the latter could development & performance standards and guidelines. This will ensure that appropriate weight is given to the</p>	<p>We have revised the planning provisions to include the transport upgrades and ecology requirements within both Sections 10 and 15 of the District Plan and removed them from Appendix 10 (Airport Business Structure Plan).</p> <p>We have also updated the s32 Evaluation Report.</p>

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21	Transport	<p>respective aspects in cases were a development trips out of the PA or CA status into DA status and give sufficient policy framework for non-conforming proposals to be refused where necessary.</p> <p>The information provided does not include the base data, so it is difficult to compare the proposed effects of the development against the current situation. All the modelling provided shows the proposed volumes in 2031 in multiple scenarios.</p>	<p>We understand that you are requesting baseline 2022 data, which would comprise of the existing traffic volumes on the adjoining road network plus trips generated by all the existing development + the potential for the yet to be established (but live zoned) precincts within the Airport Business Zone.</p> <p>We would like to understand the rationale for needing this baseline 2022 data given that Northern Precinct will not be developed in 2022 and the volumes on the road currently are likely to change considering the changes to the surrounding road network (i.e. opening of HamWEX, Peacocke Growth Cell, etc).</p> <p>We note that the ITA has been based on a 2031 year scenario, which consider is a more appropriate baseline. This enable us to determine the extent of effects by considering all the consented / zoned precincts within ABZ and the planned road network changes.</p> <p>We note that If the you are actually requesting a Baseline 2031 data (i.e. without Northern Precinct but with all other consented / zoned precincts and road network changes), we did undertake some initial modelling to understand the effects at the SH3 / Raynes Road intersection as well as the SH21 / Raynes Road which we could provide.</p>
22	Transport	<p>The scenarios provided are developed using the Waikato Regional Transport Model (WRTM) (2017 version) using '2013 census data, with future forecast models for years 2021, 2031, 2041 and 2051'. The ITA did state that the peak periods forecast in the model 'show much lower traffic volumes' 'than was recorded from traffic counts in 2019'. This model is shown to include the Southern Links. However, there are three options without southern links (Section 7.3). Each of these options show higher volumes of traffic on the proposed precinct network (e.g. Raynes Road 12903, vs.</p>	<p>We are unsure what is requested in this item. Can you please clarify what further information the feedback is seeking.</p>

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		SH21 10,996), suggesting the impacts to the existing network is less than should be expected	
23	Transport	Anomalies in the intersection performance results shows an unexpected output on a key intersection (intersection 5: SH3 / Raynes Road), where there is a 307.1m queue in the AM peak which is expected, but with a 6.8 second delay and Level of Service (LOS).	There are approximately 1,400 vph arriving from the north on a single lane approach which explains the queue. However, the average delay achieved is minimal as these vehicles give-way to only approximately 60 right turning vehicles from the south. The average delay achieved has been chosen as the parameter to determine the LOS in this case.
24	Transport	Metro Spatial Plan – Aurecon are working with Hamilton City Council (HCC) to develop a Metro Spatial Plan, that is investigating opportunities and requirements for the implementation of a Metro system in Hamilton. This is under development and yet to be confirmed, however, the proposals suggest that the proposed Southern Links state highway project will not be implemented. One of the base assumptions of the BBO ITA is that Southern Links will be construction between 2031 and 2041. This has not been stated as a definite outcome but some of the development is dependent on the network capacity improvements provided by it. Therefore, the traffic modelling and development recommendations are based to some degree on the substantial road network capacity forecast post 2031.	The ITA states that without Southern Links, approximately 129 ha of the plan change area can be developed (out of 133 ha). The transportation infrastructure improvements that are required to enable the development of 129 ha (pre-Southern Links) have been summarised in Table 9 of the ITA. The intersection performances described in Section 8 of the ITA are all based on the pre-southern links scenario. Therefore, only the remaining 4 ha of the development could be stated as being dependent on the network capacity improvements provided by SL.
25	Transport	The ITA proposes that there will be little to no Public Transport, only the “on-demand” service called “Flex”, walking and cycling demand or use, and therefore have modelled volumes based on no use, producing 2,490 vehicles per hour in the peak. This is not in keeping with the recently produced Government Emissions Reduction Plan (ERP), which sets out a strategy to reduce emissions. This will require some optioneering as to how this development would meet these targets, including encouragement of active mode and public transport use, car-pooling, and working from home. These should be encouraged by the development of travel plans and financial contributions to infrastructure, for public transport and active modes.	The ITA does state that the proposed Northern Precinct development is likely to further increase demand for the Flex service and scheduled bus services. However, the ITA also discusses the short- and long-term public transport opportunities (which have been discussed with WRC) and proposes a new walking and cycling path through Faiping Road. These proposals do support and encourage active transport as viable travel choices for commuting to the wider Titanium Park and Airport Precincts. We consider that the detailed implementation of these proposals is more appropriate to be carried out at subsequent resource consent process for development within the Northern Precinct.

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26	Transport	There are no details provided regarding parking requirements of each development and required allocations, which could also be used as a mitigation method for vehicle demand	We are of the view that it would be more appropriate for parking generation / demand of each development to be addressed during subsequent resource consent application stages
27	Transport	As discussed in the introduction meeting, the proposed indicative cross sections in Figure 7 (section 5.5) show a narrow and restricted corridor for the spine roads, which is an appropriate level of intervention to discourage rat-running and encourage lower speeds. However, the Internal Road cross-section shows a wider corridor with painted central median, which will encourage higher vehicle speed and likely rat-running to avoid the Spine Roads. It is recommended that these cross-sections and resulting behaviour and access be considered further	The route to get from SH3 to Raynes Road via the secondary internal roads (local roads) is convoluted and unlikely to become a rat-running route. However, we will assess the effects of removing the painted central median and perhaps consider other traffic calming strategies.
28	Transport	Comments on funding and development contributions	Please refer to our comments on funding in Items 14-19 above.

Yours sincerely
Harrison Grierson



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