

SECTION 42A HEARING REPORT



To: Independent Commissioner
From: Hayley Thomas – Project Planner
Subject: Construction and establishment of a storage and distribution facility and three warehouses and ancillary offices in the Rural Zone
Hearing Date: 23 November 2023
File Reference: LU/0038/23

| | |
|---------------------------|---|
| APPLICANT: | Industre Property Rua Limited |
| AGENT: | Barker & Associates Ltd (Cambridge) |
| PROPERTY ADDRESS: | 16A Wickham Street Hamilton 3204 |
| LEGAL DESCRIPTION: | Lot 1 DP 396081 & Lot 1 DP 486522 [RT 704262] |
| SITE AREA: | 4.1774ha |
| ACTIVITY STATUS: | Non-Complying Activity |
| ZONING: | Rural Zone |
| POLICY AREA(S): | N/A |
| DESIGNATION(S): | Nil |
| PROPOSAL: | a) Construction and establishment of a storage and distribution facility and three warehouses and ancillary offices in the Rural Zone as a Non-Complying Activity; and b) Remediation of the site with regard to heavy metals and hydrocarbons as a Controlled Activity pursuant to the National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health. |

PART A – INTRODUCTION AND THE APPLICATION PROCESS

1 INTRODUCTION

- 1.1 Industre Property Rua Limited ('the Applicant') has applied for resource consent (land use) for the construction and establishment of a purpose-built Watty Ltd paint storage and distribution facility, and three warehouses and ancillary offices at 16A Wickham Street, Hamilton. A site location map is included in **Appendix 1**. A copy of the application for resource consent is attached to this report as **Appendix 2**.
- 1.2 The site to which this consent relates is a rural property 200m south of the district boundary with Hamilton City Council. A detailed description of the site is provided in Section 3 of this report.
- 1.3 The application is assessed as a Non-Complying Activity under the provisions of the Operative Waipā District Plan ('the District Plan') as 'industrial activities' to which this proposal is most suitably defined as, are not listed in the Activity Status Tables for the Rural Zone, defaulting to this activity status under Rule 4.4.1.5(b).
- 1.4 In addition to the District Plan consent, the site requires remediation due to contaminated soils being found across the site. This has been assessed under the National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health as a Controlled Activity.
- 1.5 Pursuant to Sections 95A & 95B of the Resource Management Act 1991, hereon referred to as "the Act", Council proceeded with limited notification of the application to six parties on 7 July 2023. A copy of the Council's Notification Report is attached to this report in **Appendix 3**.
- 1.6 During the submission period, four submissions in total were received, with three being in opposition and one in support in part. A copy of the submissions is included in **Appendix 4**.
- 1.7 On 18 October 2023, the applicant's agent provided Council with a suite of bespoke conditions to address matters raised in the submissions. A copy of these conditions is included in **Appendix 5**.
- 1.8 The application has been referred to an Independent Commissioner following the request of the applicant's agent on 24 August 2023.

2 PURPOSE OF THE REPORT

- 2.1 This report has been prepared by Hayley Thomas (Project Planner), in accordance with Section 42A of the Act, to provide a planning assessment and recommendation to the Independent Commissioner on the above resource consent application. The key purposes of this report are to:
- Describe the application and consent requirements;
 - Identify the issues and concerns raised by parties who have lodged submissions on this resource consent application;
 - Assess the environmental effects of the proposal, including those raised in submissions;
 - Determine the effectiveness and appropriateness of the measures proposed by the Applicant to avoid, remedy or mitigate those environmental effects;
 - Assess the proposal against the requirements of the Act and the provisions of the relevant planning instruments;
 - Make a recommendation for the consideration of the Independent Commissioner as to whether the resource consent should be approved or declined; and
 - Recommend conditions be imposed on the resource consent, if granted, to ensure that the adverse effects of the proposal can be appropriately managed.
- 2.2 **It should be noted that any of the conclusions reached, or the recommendations formed, are not binding on the Independent Commissioner. The Independent Commissioner will make their own conclusions and recommendations after having considered all the evidence from the Applicant and Submitters at the hearing.**

3 THE SITE

- 3.1 The subject site is located at the northern tip of the Waipā District, 200m from the district boundary with Hamilton City Council, at the southern end of Wickham Street. The site is held in one title with an area of 4.1774ha and split into two rectangular shaped areas which are located either side of Wickham Street. The proposed development subject to this application will be on the western side of Wickham Street occupying approximately 2.0ha.
- 3.2 The site currently consists of a number of existing yards used for various light industrial activities including, but not limited to Shaw Asphalters, Kiwi Designed Homes yard, and JK Concrete Services.

- 3.3 In terms of topography, the site is generally flat and largely compacted with metal and asphalt paving. The site has two accesses from Wickham Street with the northern most access being used by Shaw Asphalters towards the northern property boundary, and the southern access leading westward through the centre of the site servicing the other yard spaces.
- 3.4 Surrounding properties are a mix of industrial, residential and rural in nature. Directly adjacent to the northern boundary is the Waste Management Facility and the Garden Supplies Garden Centre, while west and south of the site is rural grazing land. North of the district boundary off Wickham Street is a variety of industrial activities and northwest of the site and Higgins Road is a residential area.
- 3.5 With regard to the Waipā District Plan ('District Plan'), the site is within the Rural Zone and is not subject to any policy overlay areas. Council's Special Features Maps identifies the site being within peat area and HAIL site area.



DIAGRAM 1: AERIAL PHOTOGRAPH OF SITE (SITE OUTLINED IN RED)



DIAGRAM 2: GOOGLE MAPS IMAGERY (2023) OF SITE (SITE OUTLINED IN RED)

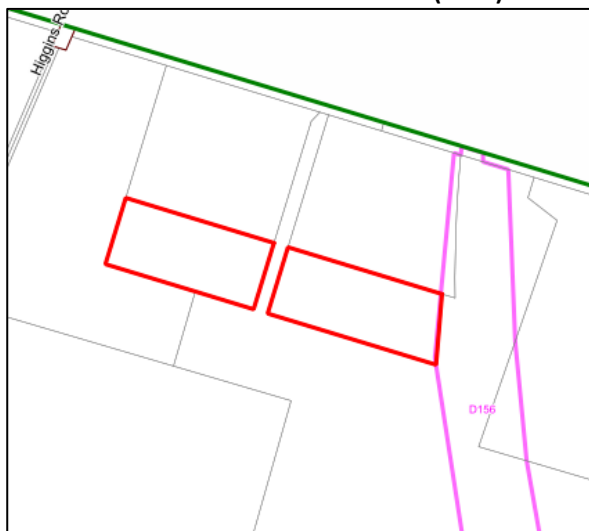


DIAGRAM 3: DISTRICT PLAN ZONE & POLICY OVERLAYS MAP (SITE OUTLINED IN RED)



DIAGRAM 4: COUNCIL'S SPECIAL FEATURES (PEAT SHOWN IN GREEN, HAIL AREAS SHOWN IN BROWN, LANDFILL SHOWN IN YELLOW)

4 BACKGROUND

4.1 The site has been subject to multiple resource consents which are outlined below in Table 1.

TABLE 1: EXISTING RESOURCE CONSENTS

| Consent No. | Description | Date Approved | Key Details |
|-------------|--|---------------|---|
| LU/0046/07 | To construct and operate a site office and overnight storage of vehicles and asphalt material | 29 June 2007 | <ul style="list-style-type: none"> ▪ Establishment of a site office and overnight storage of a maximum of 10 trucks, and excess asphalt material; ▪ No goods or services traded from site; ▪ Building coverage = 354m²; ▪ Hours of operation 7am to 6pm; ▪ Maximum of 9 staff; ▪ 1m² sign at entry to site (subject to HCC standards as within their boundary); ▪ Conditions included general accordancy, monitoring, stormwater design and management, dust, fencing, and hours of operation. |
| SP/0050/07 | Subdivision to create a landuse lot in the Rural Zone | 29 June 2007 | <ul style="list-style-type: none"> ▪ Creation of Lot 1 (being 2 ha) around the site being used under LU/0046/07; ▪ Access to the site via right of way from Wickham Street; ▪ Onsite services to be provided for water supply, wastewater, and stormwater. ▪ Written approvals provided from two other right of way users. |
| LU/0079/09 | To establish a transportable house depot, including construction of yard, offices and timber sales yard. | 24 June 2009 | <ul style="list-style-type: none"> ▪ Four dwellings to be stored onsite at any one time; ▪ Between 15-20 dwellings constructed a year; ▪ Proposed 6 staff and 8 car parks (i.e. for staff and 2 visitors); ▪ Hours of operation 7.30am to 5.00pm Monday to Friday and 8.00am to 12am on Saturday; ▪ Noting houses transported between midnight and 2am; ▪ Two portacoms on site for offices; ▪ Written approvals provided from eight adjacent properties; |

| Consent No. | Description | Date Approved | Key Details |
|-------------|--|-------------------|--|
| | | | <ul style="list-style-type: none"> ▪ Onsite services to be provided for water supply, wastewater, and stormwater. ▪ Conditions of consent included general accordance, monitoring, hours of operation, parking & manoeuvring, building conditions, dust, waste, signage, sale of goods, landscaping, glare and lighting, noise, stormwater management, effluent disposal and review. |
| PG/0137/22 | Pre-Application Meeting for proposed industrial warehouse for storage of paint | 27 September 2022 | <ul style="list-style-type: none"> ▪ Council's comments from pre-application: <ul style="list-style-type: none"> ▪ <i>"The existing landuse is already light industrial / mixed use and in general the proposal could be supported by Council.</i> ▪ <i>Traffic would be the main adverse effect, please provide a ITA.</i> ▪ <i>HCC approval would need to be sought for the landuse application as they are an affected party.</i> ▪ <i>Include a discussion about NES triggers, as part of the existing HAIL site.</i> ▪ <i>Discuss how the dangerous goods will be stored and distributed to ensure compliance with NES and Section 19 – Hazardous Substances."</i> |

5 THE PROPOSAL

- 5.1 Pursuant to Section 88 of the Resource Management Act 1991 ('the Act'), Barker and Associates Limited, on behalf of Industrie Property Rua Limited, have applied for land use consent to construct and establish a storage and distribution facility for Watty Ltd, and three warehouses and ancillary offices at the site known as 16A Wickham Street. This site is located within the Rural Zone and the application seeks dispensation with a number of the District Plan provisions including, but not limited to, internal boundary setbacks, building height, building coverage and daylight control.
- 5.2 The development of the site is proposed to be undertaken in two stages. Stage 1 will include the construction and establishment of the Watty Ltd paint facility on the most western portion of the site. Stage 2 involves the construction of three warehouses (tenancies currently unknown) within the eastern area of the site. Refer to Figures 8 and 9. As part of the development the site will be remediated with regard to heavy metals and hydrocarbons pursuant to the National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health.
- 5.3 In terms of traffic, the application includes an Integrated Transportation Assessment prepared by CKL. This Assessment concludes that the combined facilities (Stages 1 and 2) are anticipated to generate an average of 48 Heavy Commercial Vehicles (HCV) and 60 light vehicles per day, with a total of 117 trips.
- 5.4 With regard to servicing the site the application outlines for stormwater it is proposed to use *"a combination of piped reticulations including detention with treatment via stormwater 360 devices and grassed swales. For the building roof areas, piped reticulations conveying clean stormwater runoff will be connected to the rainwater harvesting tanks with the outflow draining to the underground detention system. The new carpark, road pavement and operation yard areas, the proposal low-impact design approach as per the Waikato Stormwater Management Guideline TR2018/01 has been adopted."*
- 5.5 For wastewater drainage and water supply, on site servicing is proposed. Water will be collected via on-site rainwater harvesting tanks, and trucked in when additional water is required. Wastewater will be collected in a central holding tank to be emptied as necessary.
- 5.6 Power and telecommunication services will be extended along Wickham Street to service each building.
- 5.7 The following paragraphs further outline each stage of development.

Stage 1 – Watty Facility

- 5.8 The first stage of the proposal is the development of the western portion of the site to establish a purpose-built facility for Watty Ltd for the storage and distribution of paint related products. The facility will include a dangerous goods building, breezeway, warehouse, mixing room and office. The following paragraphs further describe each of these facilities.
- 5.9 Access to this portion of the site will be via a new shared driveway adjacent to the northern property boundary from existing right of way off Wickham Street.
- 5.10 Refer to Diagrams 7 to 9.

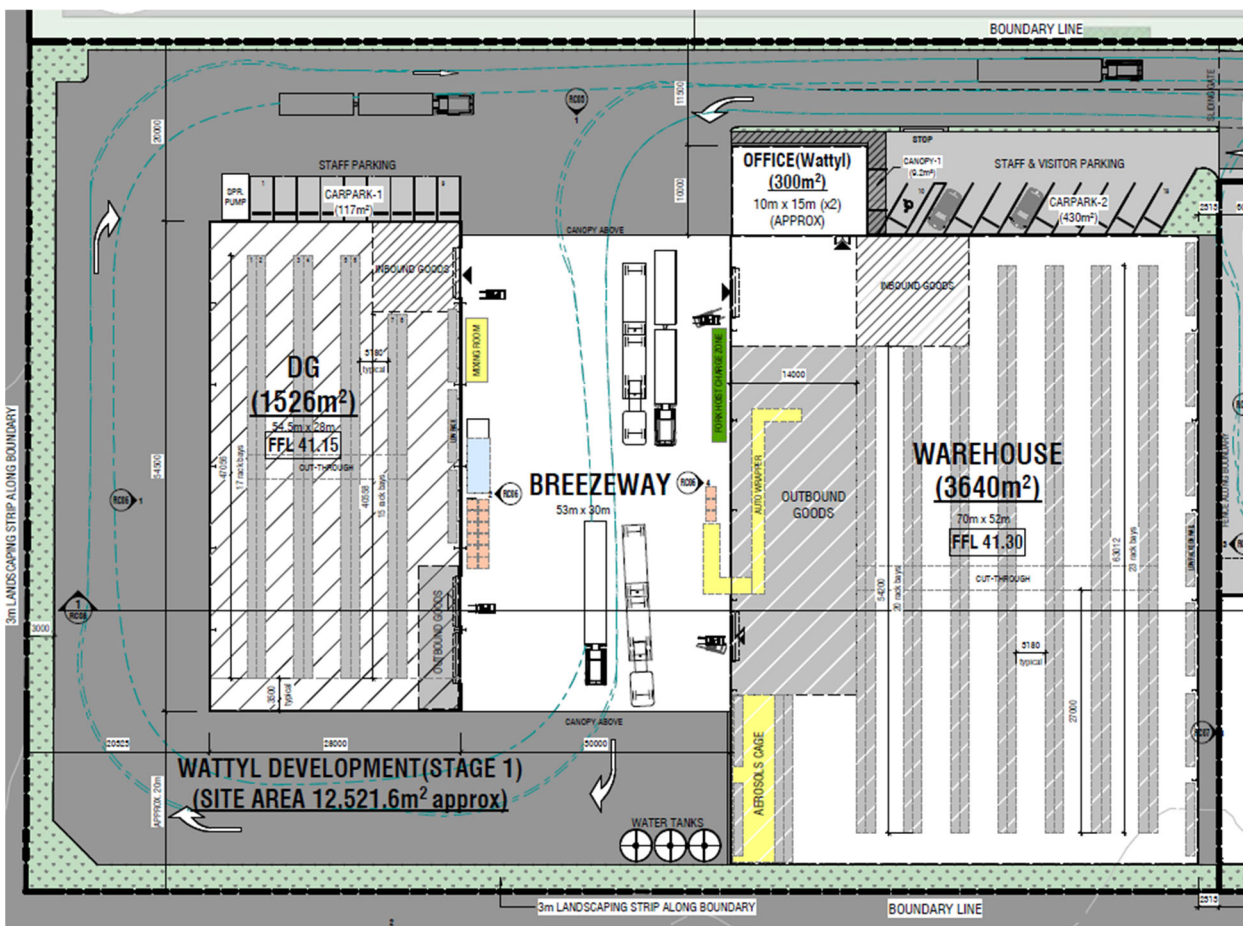


DIAGRAM 7: SNIPPET SHOWING STAGE 1 OF SITE PLAN

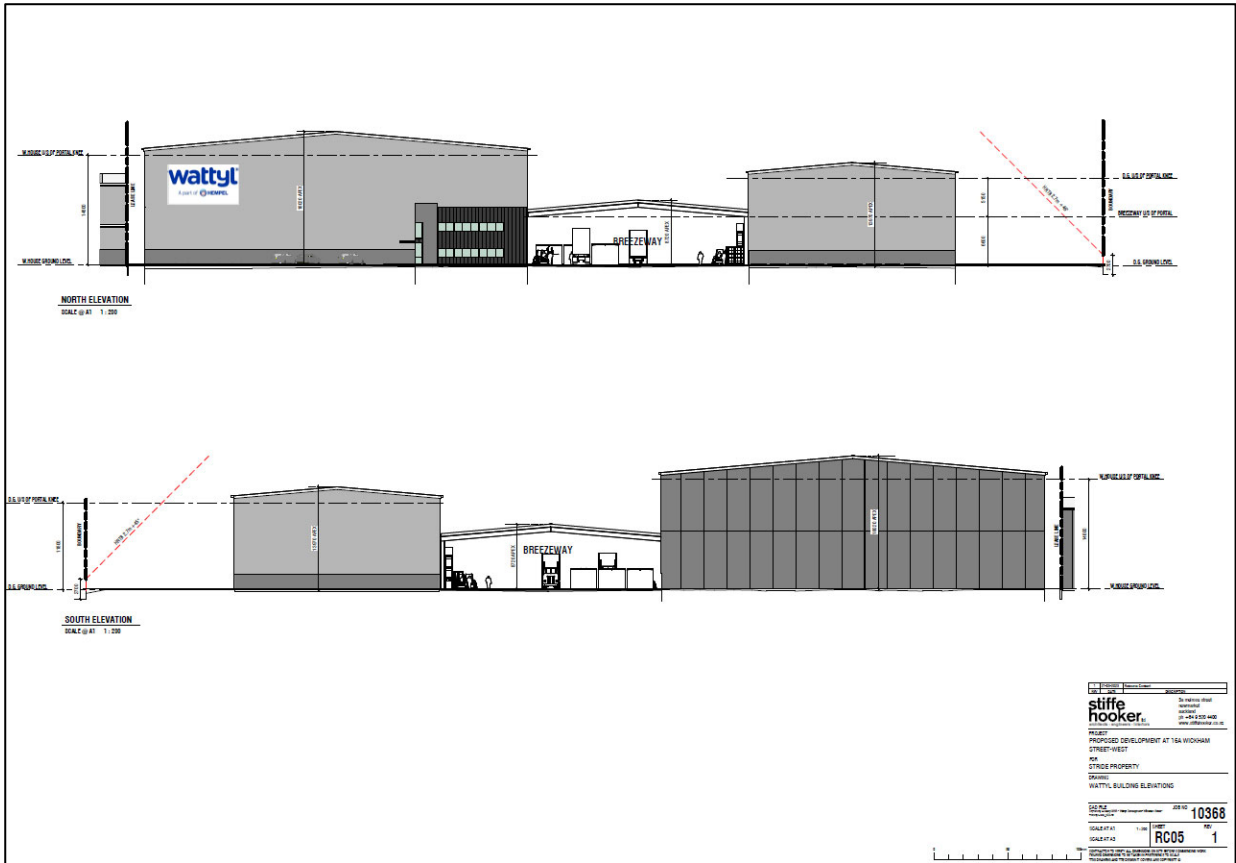


DIAGRAM 8: PROPOSED WATTYL FACILITY ELEVATION PLAN

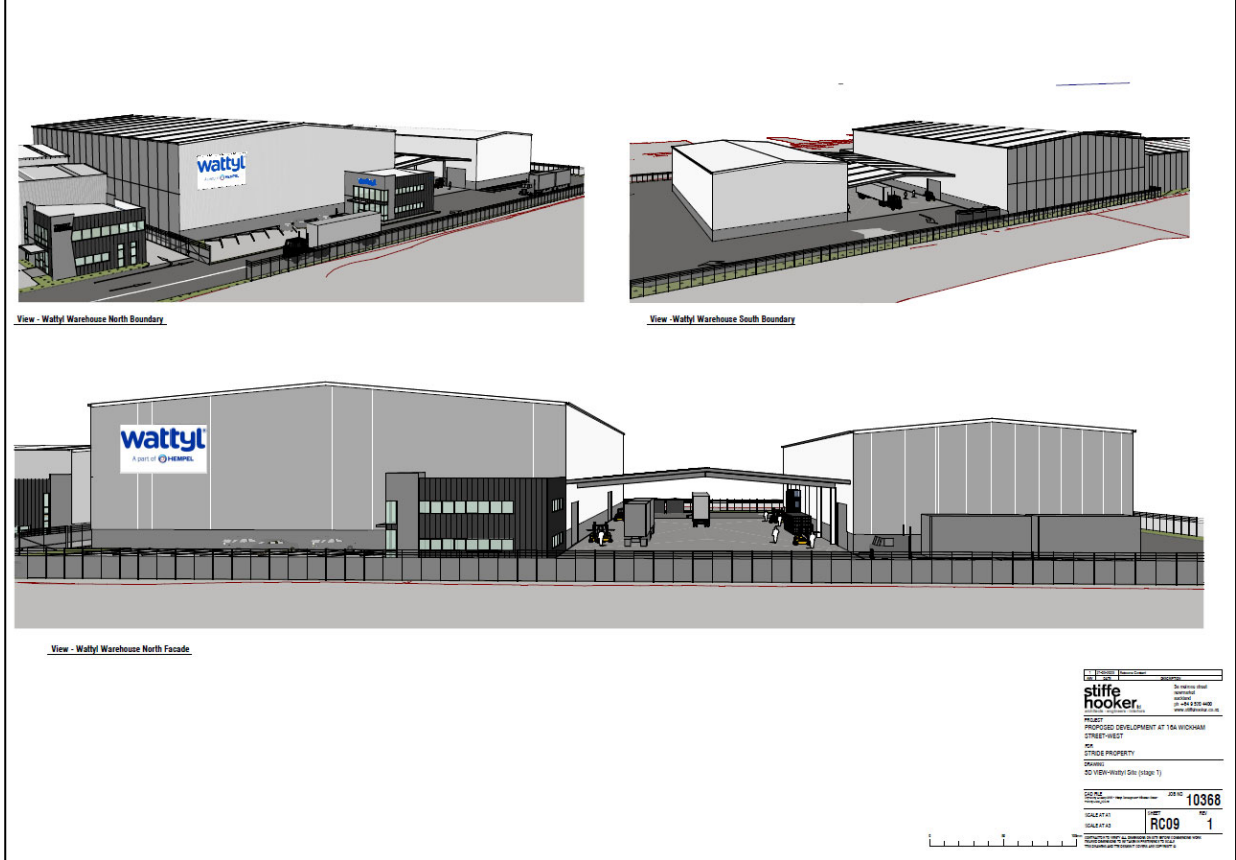


DIAGRAM 9: PROPOSED WATTYL FACILITY 3D PERSPECTIVE

Dangerous Goods Building

- 5.11 The Dangerous Goods Building will be constructed at the northwestern end of the site, 41.15m from the western boundary. The building will be 1,526m² in area and be 13.97m in height.
- 5.12 The purpose of the Dangerous Goods Building is for the storage and distribution of flammable liquids. The positioning on the western side of the site is for safety reasons, to separate it from the main Warehouse and Breezeway in-order to comply the specifications for storage and distribution of dangerous goods.

Breezeway

- 5.13 The Breezeway will be located in the centre of the site, positioned between the Dangerous Goods Building (to the west) and the Warehouse (to the east). The Breezeway will cover 1,590m² in area and stand 8.73m in height.
- 5.14 The Breezeway will be used as a transit area for deliveries and dispatch of product and the unloading and dispatchment of outwards goods. Traffic will enter from the north and exit from the south in a clockwise direction. The Breezeway will also be used to temporarily hold hazardous paint related substances for periods up to 72 hours.

Warehouse

- 5.15 The Warehouse will be the largest and tallest building within the development, with an area of 3,604m² and an apex height of 18.02m tall. The Warehouse will be located to the east of the Breezeway and adjacent to the Stage 2 development. The Warehouse will be the primary storage area and will also include a caged area in the southwest corner to store flammable aerosols.

Mixing Room

- 5.16 The Mixing Room will be located on the western side of the Breezeway up against the Dangerous Goods Building. The purpose of the Mixing Room is for blending and repacking paints before they are distributed.

Office

- 5.17 The Office is a two storied 300m² building attached to the northern side of the Warehouse. The Office will be used for general staff amenities for Stage 1 of the development.

Stage 2

- 5.18 The second stage of the proposal is for the construction of three independent warehouses and ancillary offices in the eastern portion of the site adjacent to the existing right of way. The layout and elevations of the three warehouses as shown below in Diagrams 10 to 13.
- 5.19 The following paragraphs further describe the three warehouses. As noted above, the future tendencies are currently unknown.

Warehouse 1

- 5.20 Warehouse 1 is located within the south-eastern corner of the Stage 2 site, east of the proposed Watty Ltd Warehouse. The warehouse will occupy 1,800m² with a height of 12.27m. Warehouse 1 has been provided with eight carparks and an office area both of which are located to the east of the warehouse and adjacent to the existing right of way. A 3m landscaping strip is proposed along both the eastern property boundary and the southern property boundary.
- 5.21 Visitor and staff access (i.e. cars) will be from Wickham Street, with a secondary heavy vehicle access west of Warehouse 2, circulating around Warehouse 2, north of Warehouse 1, and back out onto the existing right of way.

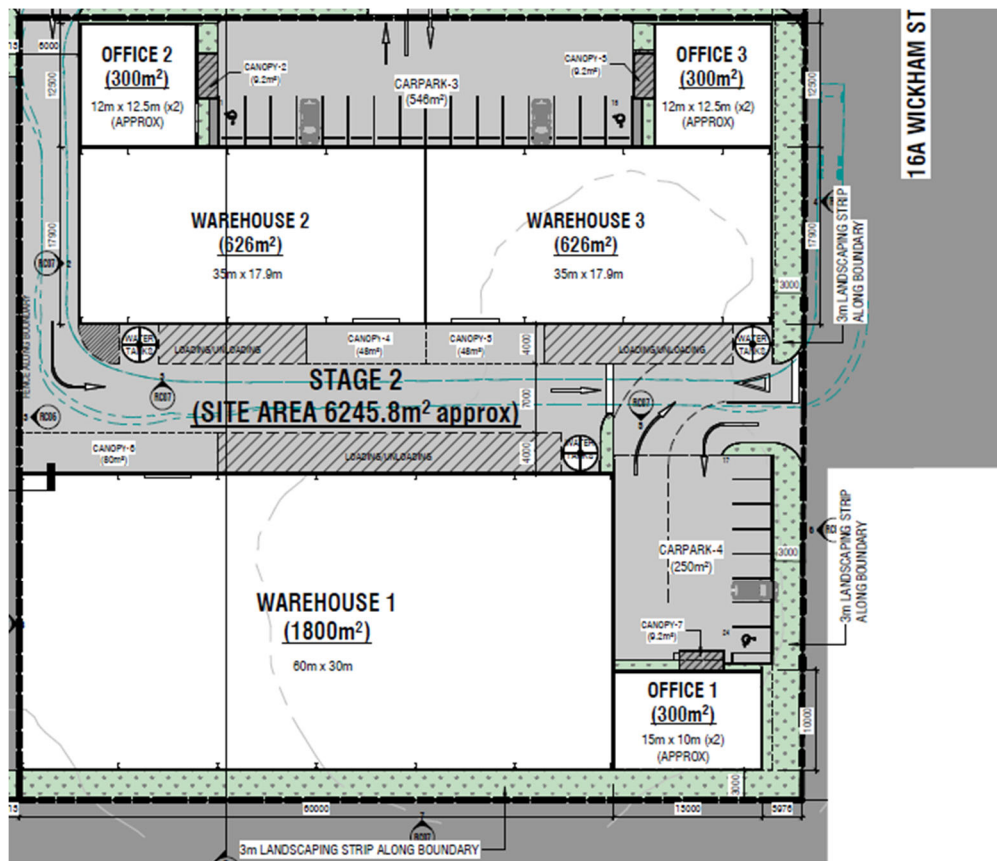


DIAGRAM 10: SNIPPET SHOWING STAGE 2 OF SITE PLAN

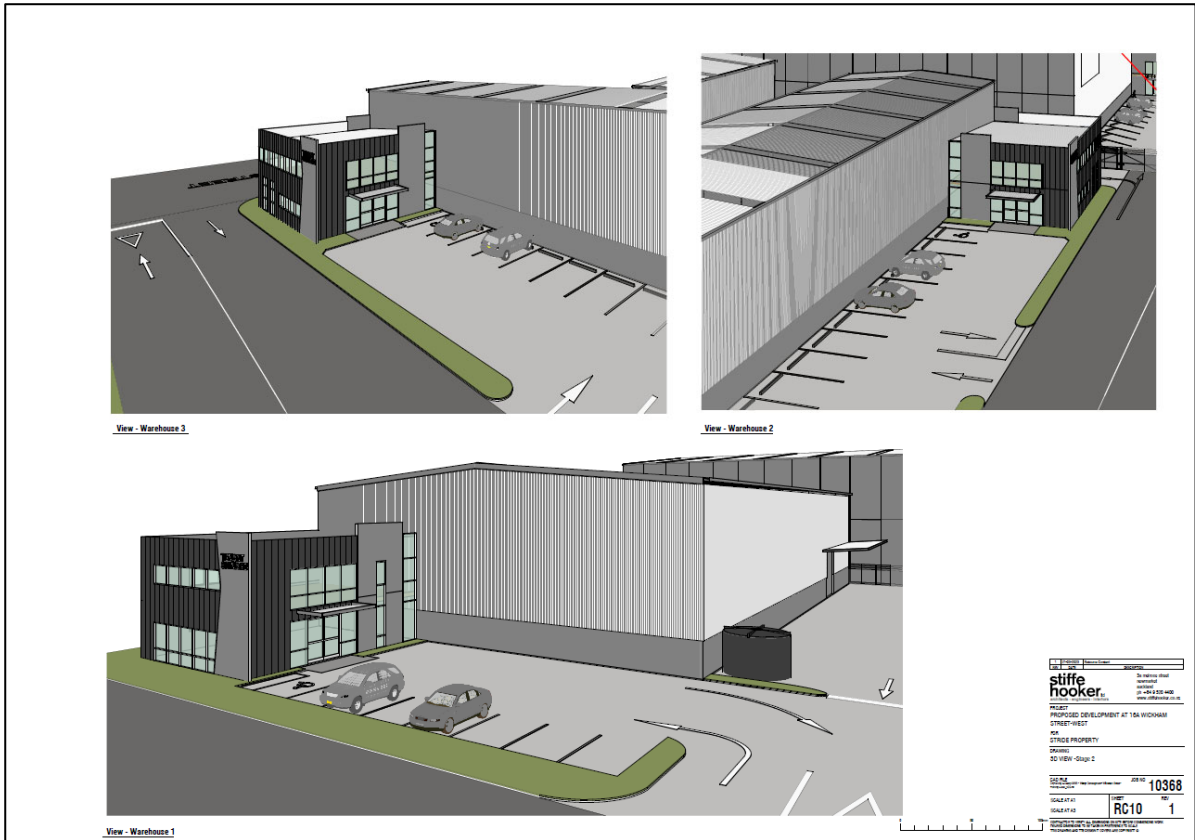


DIAGRAM 11: 3D VIEW OF PROPOSED DEVELOPMENT

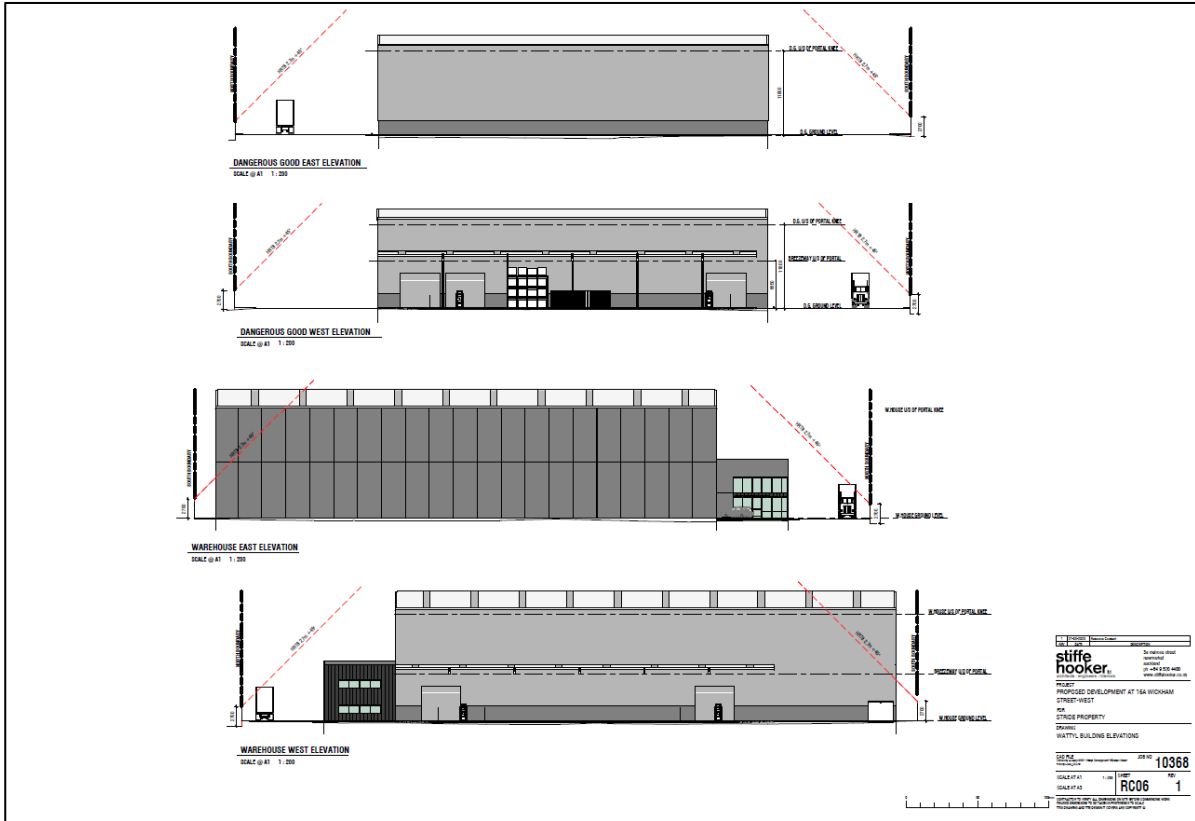


DIAGRAM 12: PROPOSED ELEVATIONS PLAN OF STAGE 2 BUILDINGS

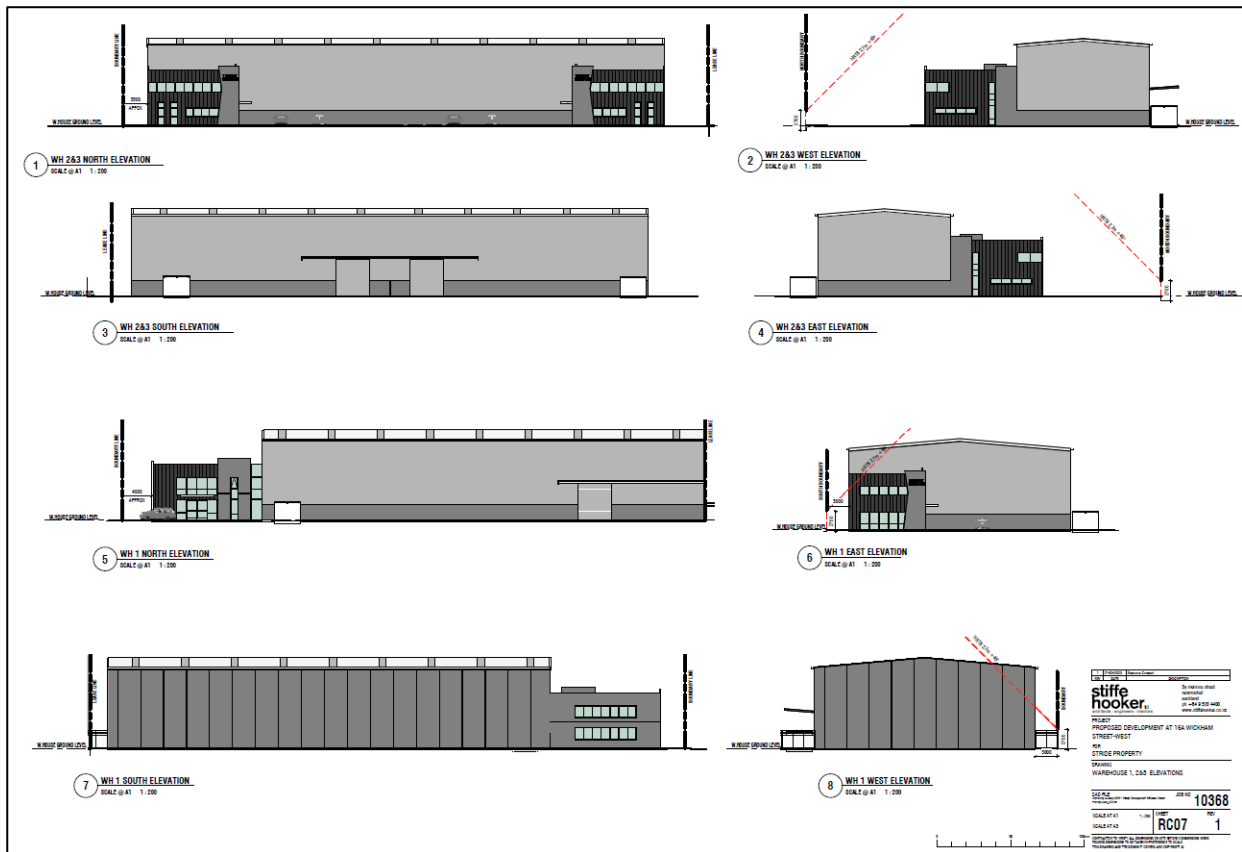


DIAGRAM 13: PROPOSED ELEVATIONS PLAN OF STAGE 2 BUILDINGS

Warehouse 2 & 3

5.22 Warehouses 2 and 3 will be positioned in the north-eastern portion of the Stage 2 site. This will have frontage to the access to Stage 1 and be located north of Warehouse 1. A 3m landscaping strip is proposed along the property boundary between the existing right of way and Warehouse 3. Warehouse 2 and 3 will be connected to one another holding a combined area of 1,252m² with a height of 11.74m. An ancillary office will be located at each end of the warehouses with a central carpark of 16 spaces provided between the offices.

5.23 Visitor and staff access (i.e. cars) will be from the Stage 1 access way, with a secondary heavy vehicle access west of Warehouse 2, circulating around to the rear of the building and back out onto the existing right of way.

6 ACTIVITY STATUS

6.1 Section 5 of the Assessment of Environmental Effects report prepared by Barker & Associates, on behalf of the Applicant, dated 24 March 2023 provides an assessment of the proposal against the relevant provisions of the District Plan. Section 2 of the Notification Report (included as **Appendix 3**) provides my assessment. In summary,

both parties conclude that the proposal requires resource consent as the proposed activities are not provided for in the Rural Zone.

6.2 Overall, the application is deemed to be a Non-Complying Activity.

7 SUMMARY OF NOTIFICATION ASSESSMENT

7.1 Under the Act, the notification provisions are contained in Sections 95A to 95F. Specifically, Sections 95A to 95F set out the process for determining whether or not public notification or limited notification of the application is required. Having regard to the notification provisions, a notification assessment has been completed and is contained in **Appendix 3**.

7.2 This report concludes:

- The information contained within the application is substantially suitable and reliable for the purpose of making a recommendation of and decision on notification;
- The applicant did not request that the application be publicly notified and there are no rules in the District Plan relevant to this proposal that require that the application must be notified;
- There are no rules in the District Plan relevant to this proposal that preclude public or limited notification;
- In terms of the permitted baseline, the District Plan provides for rural and farming activities. The proposed activities are best defined by the District Plan as 'industrial activities' which do not have a permitted baseline in the Rural Zone.
- The receiving environment is subject to a number of granted consents, which result in the area being described as semi-industrial without a typical farming character. With the exception of 16 Wickham Street, the surrounding properties have an open character, noting that large buildings in the wider area are limited to those properties within the Hamilton City boundary.
- The assessment of effects considered the proposal with regard to:
 - Character and Amenity;
 - Roothing;
 - Infrastructure;
 - Construction and earthworks;
 - Reverse Sensitivity;
 - Contaminated Soils; and

- Hazardous Substances.
- The adverse effects were assessed to be below the ‘more than minor’ threshold and the proposal could be considered without the need for public notification.
- There are no special circumstances that warrant public notification.
- The property subject to this application is not within, adjacent to, or directly affected by a statutory acknowledgment area.
- Pursuant to Section 95B, it was considered that the proposal warrants limited notification to the following parties:
 - Hamilton City Council;
 - Hamilton Organic, occupier at 18 Wickham Street;
 - South Park Agricultural at 20 Wickham Street;
 - Waste Management Hamilton Transfer Station, occupier at 16 Wickham Street;
 - Complete Landscaping Supplies, occupier at 16 Wickham Street; and
 - Waka Kotahi – New Zealand Transport Agency.

7.3 The application proceeded to limited notification on 7 July 2023.

8 SUBMISSIONS

8.1 A total of four submissions were received during the statutory submission period, three of which were in opposition and one in support in part. The submissions are attached at **Appendix 4**. The location of these parties is shown below in Diagram 14.

8.2 The opposing submissions raise the following matters:

- Strategic Planning Matters;
- Traffic (including but not limited to the entrance to right of way, the state of access leg, effectiveness of the Travel Management Plan, and the implications for the State Highway 1C intersections);
- Three Waters (Wastewater Disposal, Water Supply and Stormwater Disposal);
- Reverse Sensitivity; and
- Building setbacks.

8.3 In their submission Hamilton City Council raises concerns with ‘strategic planning matters’ stating the proposal is inconsistent with a number of planning instruments and strategic documents. Section 11 to 13 of this report provides further discussion

regarding the District Plan Objectives and Policies, Other Statutory Planning Documents and Other Matters pursuant to Section 104(1)(c).

8.4 Traffic, Three Waters, Reverse Sensitivity and Building Setback Effects are discussed further in Section 10 of this report.

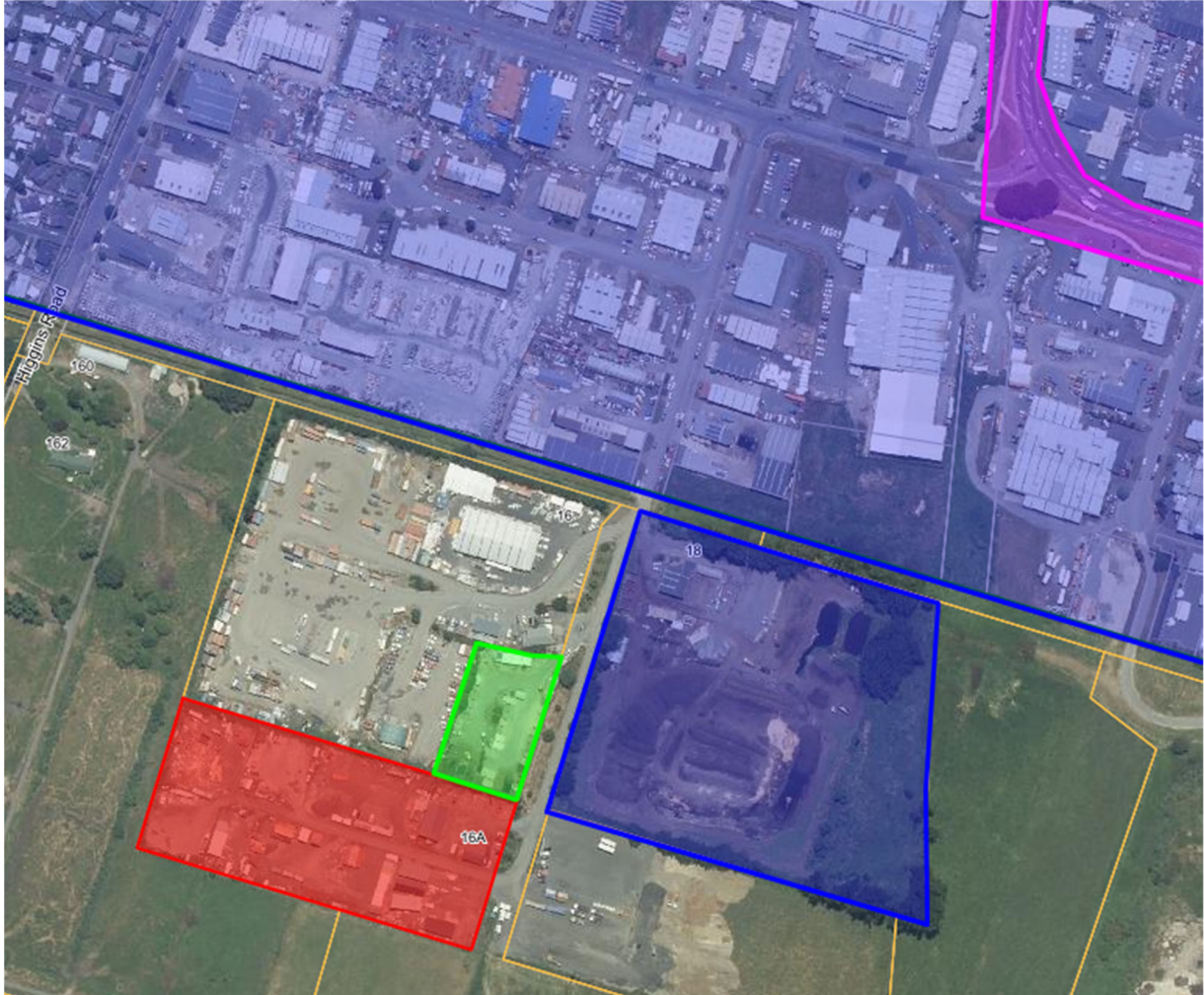


DIAGRAM 14: LOCATION OF SUBMITTERS DIAGRAM (SUBJECT SITE HIGHLIGHTED IN RED, SUBMITTERS IN OPPOSITION SHOWN IN BLUE, SUBMITTER IN SUPPORT IN PART SHOWN IN GREEN AND STATE HIGHWAY SHOWN IN MAGENTA)

PART B – RESOURCE MANAGEMENT ACT 1991 ASSESSMENT

9 SECTION 104 ASSESSMENT

9.1 A consent authority must have regard to a number of matters under Section 104 of the Act when making a decision on an application for resource consent. Those matters include:

- The actual and potential effects of an activity on the environment (Section 104(1)(a)) and relevant provisions of an operative and / or proposed District Plan;
- Any measure proposed or agreed to by the Applicant for the purpose of ensuring positive effects on the environment to offset or compensate for any adverse environmental effects that may or will result from the activity (Section 104(1)(ab));
- The provisions of National Directions, the Regional Plan or the Regional Policy Statement, or any other relevant statutory documents (Section 104(1)(b)); and
- Any other matter the consent authority determines relevant and reasonably necessary to determine the application (Section 104(1)(c)).

9.2 On 18 October 2023, the applicant’s agent provided Council with a suite of bespoke conditions to address matters raised in the submissions. The conditions have been considered in the following assessment.

9.3 The application is for a Non-Complying Activity under the District Plan. The Council may therefore grant or refuse consent under Section 104B and, if granted, may impose conditions under Section 108 of the Act only if it is satisfied that either the adverse effects will be minor, or the activity will not be contrary to the objectives and policies of the District Plan (Section 104D).

9.4 The following provides my assessment of all relevant matters under Section 104.

10 ASSESSMENT OF ENVIRONMENTAL EFFECTS (SECTION 104(1)(A))

10.1 The meaning of ‘effect’ is defined under the Act as:

In this Act, unless the context otherwise requires, the term effect includes—

- (a) *any positive or adverse effect; and*
- (b) *any temporary or permanent effect; and*
- (c) *any past, present, or future effect; and*

- (d) *any cumulative effect which arises over time or in combination with other effects —regardless of the scale, intensity, duration, or frequency of the effect, and also includes—*
- (e) *any potential effect of high probability; and*
- (f) *any potential effect of low probability which has a high potential impact.*

10.2 With the above definition in mind, and the assessment of adverse effects in the approved Notification Report, which is also relevant for the purposes of the assessment required under Section 104(1)(a), the actual and potential effects of the proposed activity requiring further examination relate to those matters raised in submissions. These matters are:

- Traffic;
- Three Waters (Wastewater Disposal, Water Supply and Stormwater Disposal);
- Reverse Sensitivity; and
- Building setbacks.

Traffic

10.3 As noted in the Notification Report, traffic and the effects on the roading network are an instrumental to ensure an integrated approach to land use and transport, and that the roading network can continue to function in a safe and efficient manner. In this instance, the subject site does not have access to Waipā District Council’s roading network, and instead has access to Wickham Street and use of the Hamilton City Council roading network. The nearest large intersections are also part of the State Highway Network and under the jurisdiction of Waka Kotahi.

10.4 All four submitters have raised concern with regard to the effects of the proposal and the associated traffic, including the safety and use of the existing entrance to the site, the state of the access leg, the effectiveness of the proposed Travel Management Plan and the implementation of this, and the impact and safety effects of the anticipated vehicle movements on the State Highway intersections.

Existing entrance from Wickham Street

10.5 The end of Wickham Street branches into three access ways which serve the existing properties and activities. There is no physical definition of each access or a change in the legal roadway to distinguish the public/private interface. Submissions have raised current safety issues as a concern noting the *“lack of control on the road end, with no give ways or management for each driveway user”* has the potential to *“exacerbate these issues leading to accidents at the road end. Safety improvements to the road*

end need to be undertaken, with improvements agreed with the other road end owners and tenants.”

- 10.6 The Application, including the Integrated Transportation Assessment, and the proposed consent conditions prepared by the Agent, have not suggested any changes or mitigation to the existing entrance arrangement at the end of Wickham Street.
- 10.7 While I understand the concerns raised in the submission and agree the existing entrance arrangement within the access leg is less than ideal, the Integrated Transportation Assessment included with the application has not suggested the current arrangement will be affected in such a way that mitigation by the applicant is required. As the access leg is privately owned, and used by a number of parties, it would be my recommendation that the matter is raised with the landowner and private agreements reached for the upgrading and enhancement of this entrance between the various users.

State of the Access Leg

- 10.8 With regard to the state of the access leg, the application does not propose any upgrades or changes between the end of Wickham Street to the site boundary. Submissions have raised this as a concern requesting upgrading of the private access road to the new site. Should consent be granted, consent conditions could be used to upgrade the state of access leg from the end of Wickham Street to the subject site. While I note that this would be beneficial to other users of the access leg, I consider that the existing state is the responsibility of the current landowner and occupiers. In terms of any potential effects on the access leg as a result of the proposed activity, the Integrated Transportation Assessment included with the application has not suggested the effects will be such that mitigation such as upgrading the access leg is required.

Effectiveness of the Travel Management Plan

- 10.9 Both submissions from Waka Kotahi and Hamilton City Council, the road controlling authorities over the routes proposed to be used by the activity, have queried the effectiveness of the proposed Travel Management Plan and its implementation. Council’s Development Engineers, while noting these submissions, consider that the road controlling authorities are best placed to make a determination of the effects on the wider roading network. Having reviewed the submissions from both parties, and considering how the proposed Travel Management Plan will be implemented, monitored and enforced, I am of the opinion that it is not clear how the two road controlling authorities, and Council, will be able to enforce the Travel Management Plan as a potential condition of consent.

Impact of vehicle movements on State Highway Intersections and Safety Effects

10.10 In terms of the additional movements on the highway intersections, the applications Integrated Transportation Assessment acknowledges the existing safety concerns at these intersections and recommended a Travel Management Plan as a mitigation measure to minimise vehicles using these intersections. As noted in the Notification Report, both the assessments by CKL and Council’s Development Engineer have demonstrated that the proposed Travel Management Plan will mitigate potential adverse effects related to anticipated traffic volume generated by the activity.

10.11 The proposed consent conditions prepared by the Agent have included Condition 18 which states:

“A Travel Management Plan shall be developed in consultation with Hamilton City Council and remain in place until such a time as the State Highway 1C/Kahikatea Drive Intersection is upgraded (or Hamilton City Council confirms in writing that it is no longer necessary). The Travel Management Plan is to include (but not limited to) measures to avoid right turn demand from Kahikatea Drive onto State Highway 1C and be generally in accordance with the draft Traffic Management Plan prepared by CKL dated 14-03-2023.”

10.12 Submissions on this matter state:

- *“Hamilton City Council engaged Grey Matter consultants to review the applicant’s Integrated Transport Assessment (ITA). From this review, Hamilton City Council is concerned that the proposal will give rise to adverse traffic effects that cannot be addressed via consent conditions”*
- *“no supporting information that demonstrates that the additional vehicle movements at the Higgins Road/Kahikatea Drive intersection will not result in adverse safety effects.”*
- *“no supporting information that demonstrates the additional vehicle movements at the Higgins Road/Killarney Road intersection will not result in significant adverse safety effects”*
- *“Waka Kotahi considers that even with a Travel Management Plan in place, (notwithstanding the question of the effectiveness of this as discussed above) the applicant should undertake an assessment of the intersection capacity which assesses whether the average delays for introducing additional vehicle movements with left turns using SH1C/Kahikatea Drive and SH1C/Duke Street intersections would have any additional safety effects.”*
- *“The proposed Travel Management Plan provides for vehicles travelling east to turn right from Higgins Road onto Killarney Road and then right again at the signalised intersection with SH1C. While it is recognised that the*

Higgins/Killarney intersection is a local road intersection, it is entirely within the Waka Kotahi highway designation E81 (Figure 1), and approximately 100m from the SH1C/Killarney Rd intersection.

Given it is within a Waka Kotahi designation and in close enough proximity to impact the operation of the state highway intersection, Waka Kotahi considers it appropriate that the applicant addresses the safety effects associated with increased right turn movements from Higgins Road onto Killarney Road.”

- 10.13 Based on the submissions received, it is my planning opinion, that the proposed Travel Management Plan is not likely to mitigate the potential safety effects at the state highway intersections. Should the Applicant present evidence that satisfies Waka Kotahi and Hamilton City Council concerns, resulting in effect management that is to an acceptable level, I am happy to revisit my opinion.

Three Waters (Wastewater Disposal, Water Supply and Stormwater Disposal)

- 10.14 In their submission, Hamilton City Council raised concerns with the onsite servicing of the development, stating they consider the development is an “urban activity” and the activity should be held “*against standards for similar activities in an urban environment as opposed to those in a rural zone*”. The submission further notes Hamilton City Council’s Three Waters Connections Policy and notes the City “*will not provide Three Waters Services to this development*”.
- 10.15 In terms of the Waipā District Council three waters services, the site is outside of any reticulated areas, and due to its Rural Zoning, is expected to have onsite servicing. The application has therefore provided onsite infrastructure solutions in keeping with the zoning of the site. The proposed servicing has been reviewed by Council’s Development Engineer, who, should consent be granted, have confirmed their support subject to conditions of consent regarding detailed design and construction of the infrastructure.
- 10.16 Based on the information provided in the application, and the support from Council’s Development Engineer, it is my opinion the effects of the servicing of the site in terms of the Three Waters can be mitigated to an acceptable level.

Reverse Sensitivity

- 10.17 The site is located within the Rural Zone and used for semi-industrial uses. In terms of proposed activities on the site, the Notification Report considered the potential for adverse reverse sensitivity effects to arise. Two submitters have raised reverse sensitivity effects as a concern noting existing activities on adjacent sites can lead to discharges of odour, dust and noise, of which new owners/occupiers of the warehouses and offices may be sensitive to.

- 10.18 In terms of the concern regarding odour, dust and noise from the existing activity at 18 Wickham Street, I note this activity is subject to existing consents (RC/1131, RC/1394 & RC/2359) which include conditions regarding management of the effects generated by this activity. Additionally Rule 20.4.2.1 of the Waipā District Plan seeks to ensure odour producing activities do not cause nuisance beyond the boundaries of the site. Should the activity at 18 Wickham Street be acting in accordance with the granted consents, and the provisions of the District Plan, then its effects, including odour, beyond the property boundary, should be already mitigated.
- 10.19 Within the submissions regarding reverse sensitivity, the following are suggested as mitigating measures that could be used:
- Consent condition restricting any use of the site for residential dwellings and retail activities;
 - Relocation of the proposed offices away from the existing organic operations at 18 Wickham Street; and
 - Implementation of a ‘no complaint’ covenant in terms of the operations at 18 Wickham Street.
- 10.20 With regard to the request for a condition restricting the use of the site for residential dwellings and retail activities, I note within the Rural Zone provisions of the District Plan dwellings and residential activities are a permitted activity, while ‘retail activities’ are not listed within the activity status tables so would require consent under Rule 4.4.1.5(b) as a Non-Complying Activity. As the proposed activity does not include residential or retail activities, I do not consider it appropriate, should consent be granted, to include such a condition.
- 10.21 In terms of the submission requesting the relocation of the proposed offices, this is a matter the Applicant may wish to consider. In my opinion, the existing separation between the two sites, and the existing consent conditions for the activity at 18 Wickham Street, should mitigate the potential reverse sensitivity effects to an acceptable level, therefore should consent be granted no further mitigation is required.
- 10.22 The proposed consent conditions prepared by the Agent have included Condition 21 which states:
- “The consent holder shall enter into a no-complaints covenant with the adjoining Hamilton Organic Waste Centre which shall be registered on the certificate of title for the site. The no-complaints covenant shall provide that any owners or occupiers of the site will not lodge any complaints with the Hamilton*

City Council regarding any odours or noise generated from the lawful operation of the existing organic waste facility.”

- 10.23 While the abovementioned condition may alleviate the submitters concern regarding potential complaints against the existing operations at 18 Wickham Street, I note this refers to complaints to Hamilton City Council, which are the landowner of 18 Wickham Street. Any complaints made to the Waipā District Council would therefore still be required to be investigated.
- 10.24 In summary, it is my opinion the existing activities on neighbouring sites are subject to consents which control and manage their effects, and should consent be granted, further mitigation measures sought through submissions with regard to reverse sensitivity are not necessary.

Building setbacks

- 10.25 The District Plan includes building setback provisions which aid in mitigating the effects of activities on character and with the separation of activities which may reduce potential reverse sensitivity effects. A submitter has raised concerns with the non-compliance with the building setback provision, noting that the setback breaches further contribute to possible reverse sensitivity effects, and is not in keeping with the rural character.
- 10.26 In terms of the building setback and potential reverse sensitivity effects, I note the property at which the submission has come from is located northeast of the subject site, separated by a 20m wide access leg. While breaching the boundary setback provision, the proposed new building is located 16.1m from the northern boundary and 3.0m from the eastern boundary. Therefore there is a separation distance between the proposed building and the existing activity at 18 Wickham Street of at least 25m. The physical separation as a result of the access leg, provides the separation typically required by the boundary setback provision. I am of the opinion that increasing this building setback (i.e. changing the location to a compliant position as suggested by the submitter) will not provide any further mitigation in this instance.
- 10.27 With regard to the second point of the submission regarding the rural character, I note in the Notification Report, this area has a character that *“is best described as light industrial, with scattered buildings and large areas of hard surfacing... the wider area north of the site is split by Higgins Road with residential dwellings on the western side and industrial activities on the eastern side. The industrial area is characterised by medium to large warehouse sized buildings, and mostly paved or sealed yard areas.”* With this character in mind, I consider the proposed buildings are in keeping with the large warehouse style buildings along Wickham Street which are located much closer to the road boundary.

10.28 Overall, while the proposed building setbacks do not comply with the District Plan provisions and having considered the points raised in the submission, I consider that the resulting effects of the building location in terms of character and mitigation of reverse sensitivity effects are deemed to be acceptable.

Positive Effects

10.29 Having had regard to the adverse effects of an activity, the Act provides for the consideration of the benefits and positive effects of an activity. In this instance, the proposal will give rise to positive effects, including but not limited to:

- Increased employment opportunities during the construction; and
- Increased employment opportunities post construction; and
- Increased warehousing and office facilities within the District and in close proximity to Hamilton City.

10.30 I note that any positive effects cannot be realised without causing adverse effects as outlined in the preceding sections of this report. In order for the application to be granted, the Resource Management Act 1991 requires these effects to be suitably avoided, remedied or mitigated.

Summary of Effects Assessment

10.31 The above assessment has considered the actual and potential effects of the proposed activity raised in the application, Council's notification assessment and the submissions received. Having due regard to the information provided, I consider the proposed traffic safety effects of the activity have not been demonstrated to be appropriately avoided, remedied or mitigated to an acceptable level.

10.32 With regard to the proposed Three Waters, Reverse Sensitivity and Building Setback effects, as raised through submissions, I consider the associated effects are either acceptable, or can be mitigated, should consent be granted, through the imposition of conditions to an acceptable level.

11 DISTRICT PLAN OBJECTIVES AND POLICIES ASSESSMENT (SECTION 104(1)(B))

11.1 The District Plan contains a number of objectives and policies that directly relate to this land use consent application. Those objectives and policies are contained in Section 1 -Strategic, Section 4 – Rural Zone, Section 15 – Infrastructure, Hazards, Development and Subdivision and Section 16 – Transportation.

- 11.2 The applicant's agent has provided an assessment of the relevant objectives and policies in Section 10.1 of the application. In addition to their assessment the relevant objectives and policies from each of these sections is discussed further in the following paragraphs.

Section 1 – Strategic

- 11.3 Section 1 contains the strategic direction of the Plan and provides the basis upon which growth within the District will be managed and protected. These objectives and policies demonstrate the strategic focus to carefully manage the district's growing population, infrastructure demands, and protection of environmental, heritage and recreation values. The objectives and policies that are specifically relevant to this proposal are as follows:

Objective – Settlement pattern

1.3.1 *To achieve a consolidated settlement pattern that:*

- a) *Is focused in and around the existing settlements of the District; and*
- b) *Supports the continued operation, maintenance, upgrading and development of regionally important sites and regionally significant infrastructure and nationally significant infrastructure, and provides for on-going access to mineral resources.*

Policy - Settlement pattern

1.3.1.1 *To ensure that all future development and subdivision in the District contributes towards achieving the anticipated settlement pattern in the Future Proof Growth Strategy and Implementation Plan 2009 and the District Growth Strategy.*

Policy - Subdivision and development within the Rural Zone

1.3.1.5 *To ensure that the natural resources of the Rural Zone, including high class soils, continue to be used for rural activities by: ...*

- c) *Ensuring that development and subdivision activities within the Rural Zone do not reduce the area of land available for farming activities in the District; and...*
- f) *Avoiding sensitive subdivision, use and development that could result in reverse sensitivity effects on rural activities or existing lawfully established rural based industries...*

Objective - Planned and integrated development

1.3.2 *To ensure that development and subdivision happens in a way and at a rate that is consistent with the anticipated settlement pattern, maximises the*

efficient use of zoned and serviced land, and is co-ordinated with cost-effective infrastructure provision.

Policy - Implement Proposed Waikato Regional Policy Statement, Future Proof 2009 and Growth Strategy

1.3.2.1 To allow subdivision and development that will give effect to the settlement pattern and directions of the Proposed Waikato Regional Policy Statement and that is consistent with the settlement pattern and directions in the Future Proof Growth Strategy and Implementation Plan 2009 and the Growth Strategy, and avoid unplanned developments which are inconsistent with these directions.

Objective - Energy and resource efficiency, design, character and amenity

1.3.6 To ensure that developments and subdivisions maintain and where possible enhance key elements of character and incorporate design and sustainability principles.

Policy - Rural character and amenity

1.3.6.2 To maintain key elements of rural character and amenity by restricting the number and location of buildings, and to maintain the values associated with identified landscapes and significant natural areas.

11.4 The abovementioned objectives and policies seek to ensure development occurs in a location in which it is provided for. Objective 1.3.2 and its associated policies highlight the association of development with the wider strategic direction of both the district and region. Policy 1.3.6.2 particularly seeks to maintain the elements of the rural character by restricting the number and location of buildings.

11.5 The proposal seeks to establish an industrial activity within the Rural Zone, and in close proximity to the district boundary. As the site is not identified within an area for future industrial development, it is my opinion the proposal is not consistent with Objective 1.3.2 and Policy 1.3.2.1. I also do not consider the proposal to be consistent with restricting the number and location of buildings in the rural zone as sought by Policy 1.3.6.2.

Section 4 – Rural Zone

11.6 The objectives and policies within Section 4 – Rural Zone, provide a framework to enable continued use of the Rural Zone for a wide range of rural productive activities while continuing to emphasise the need to internalise adverse effects, and avoid cumulative adverse effects of land use activities on the environment. The objectives and policies further seek to find a balance between economically driven farming practice and amenity, landscape, biological, cultural and social values.

11.7 The objectives and policies specifically relevant to this proposal are as follows:

Objective - Rural resources

4.3.1 *To maintain or enhance the inherent life supporting capacity, health and well-being of rural land, ecosystems, soil and water resources.*

Policy - Protect the rural soil resource

4.3.1.4 *The versatility and life supporting capacity of the District's rural land and soil resource, particularly high class soils and peat soils, are protected from development, subdivision or activities that would prevent its future use for primary production, or its ability to maintain the District's ecological/biodiversity values.*

11.8 Objective 4.3.1 and Policy 4.3.1.4 highlight the significance of the rural resource for its life supporting capacity. The proposed use of the site for industrial activities will continue the non-farming use of the site and restrict its future use for any primary productive use, therefore being inconsistent with this objective and policy. I note the soil has a Class 2 categorisation under the NZLRI LUC 2021.

Objective - Rural character

4.3.7 *Rural character and amenity is maintained.*

Policies - Rural character

4.3.7.1 *Land use activities should be at a density, scale, intensity and location to maintain rural character.*

4.3.7.2 *Rural character and associated amenity values shall be maintained by ensuring rural land uses predominate in the Rural Zone, and buildings are of an appropriate scale and location.*

Objective - Rural amenity: setbacks

4.3.8 *To maintain rural character and amenity and avoid reverse sensitivity effects.*

Policy - Internal boundaries

4.3.8.2 *Buildings and activities are set back from rear and side boundaries to maintain rural character and amenity and avoid reverse sensitivity effects.*

11.9 Objective 4.3.7 and its associated policies outline the key elements for consideration for any activity within the Rural Zone with regard to character and amenity. I note Policy 4.3.7.1 refers to density, scale and intensity of activities, and the intent to maintain the rural zone for rural land uses. As the proposal is for warehousing and offices it is not consistent with the abovementioned objective and policies regarding rural character.

Objective - Non-farming activities

4.3.12 *Only non-farming activities that have a functional and compelling requirement to locate in the Rural Zone should be enabled to locate in the Rural Zone.*

Policies - Non-farming activities

4.3.12.1 *To limit non-farming activities in rural areas except for activities that:*

- a) *Have a functional and compelling reason to establish in a rural area; and*
- b) *Do not result in any further loss of land from primary production purposes; and*
- c) *Maintain rural character.*

Activities that do not meet these criteria should be accommodated in urban areas.

4.3.12.2 *The introduction of non-farming activities in rural areas shall not prevent or constrain intensive farming activities from operating.*

Policy - Reverse sensitivity

4.3.12.3 *Non-farming activities in rural areas shall internalise adverse effects and should not cause adverse effects that would result in farming activities being prevented or constrained from operating.*

11.10 Objective 4.3.12 and associated Policies 4.3.12.1 to 4.3.12.3 are instrumental with regards to considering the consistency of the proposal with the District Plan. The key consideration regarding Objective 4.3.12 is to determine whether the activity has a ‘*functional and compelling requirement*’ to be located at the subject site. The application has discussed this matter under Section 10.1.1 as follows:

“Given the site is currently used for industrial purposes (not rural related activities), has an existing underlying resource consents which permits a wider baseline of effects, and is located within close proximity to the urban limits of Hamilton, in our opinion the site exhibits a unique feature which conclude it has a functional and compelling reason to be located in this location.”

11.11 In terms of the application and the consideration of Objective 4.3.12, it is my opinion that the operation of the existing activities on the subject site provides a functional and practical justification for the location of the proposal on the site due to the existing consented activities. With regards to determining if there is a ‘*compelling requirement*’ for the location of the proposal, it is my opinion that the justification provided in the application, being the existing activities on site and the proximity to the Hamilton, are not compelling reasons.

- 11.12 Policy 4.3.12.1 uses the term ‘limit’ with regard to non-farming activities therefore some level of non-farming activity is anticipated by the Plan in this zone. The application notes that due to the established industrial activities on the site, the soil is considered to be *“compromised and it is unrealistic to think the site would ever be reinstated and converted back to rural production purposes”*. While there is no evidence to suggest reinstatement could not occur, it is considered that (b) of Policy 4.3.12.1 has been met as the proposal will not result in any further loss of land which is not currently being utilised for a primary production purpose.
- 11.13 Policy 4.3.12.3 requires the internalisation of adverse effects generated by non-farming activities in the rural zone to ensure farming activities are not prevented or constrained from operation. In this instance, the western and southern property boundaries adjoin an existing site that is used for grazing purposes. I note the adjacent property to the west and south of the site has consent for bulk earthworks which will include fill of up to 2.5m in depth across the site. This consent will also result in the nearby dwelling (at 162 Higgins Road) be used as a site office. Based on the information provided to Council it is understood that these consents will be implemented. On this basis, and in regard to Policy 4.3.12.3, there is not going to be a farming activity which the proposal would prevent or constrain, should consent be granted.
- 11.14 In summary, with regard to the objectives and policies within Section 4, the subject site and surrounds, have been described as semi-industrial given the consents granted for various activities on adjacent sites, and the existing uses established in the area. This has resulted in an existing environment that does not align itself with that described by the objectives and policies within Section 4 of the District Plan. Any further development or intensification of industrial activities on the site, in my opinion, are therefore contrary to the District Plan.

Section 15 – Infrastructure, Hazards, Development and Subdivision

- 11.15 Section 15 of the District Plan sets out the District Plan’s focus directing subdivision and development in accordance with the strategic growth objectives and policies in Section 1. Sustainable management of natural and physical resources is considered to occur where development and subdivision is planned and integrated to make the best use of the land resource. The objectives and policies that are specifically relevant to this application are as follows:

Objective - Integrated development: site design and layout

- 15.3.1 *To achieve integrated development within the District, that contributes to creating sustainable communities and enhances key elements of character and amenity.*

Objective - Integrated development: natural hazards and site suitability

15.3.2 *To ensure that sites proposed as part of a development or subdivision will be capable of accommodating activities anticipated within the applicable zone.*

Policy - Land to be suitable for use

15.3.2.1 *Land to be developed or subdivided must be physically suitable to accommodate the permitted land use activities for that zone in accordance with the rules of this Plan.*

Policy - Consideration of reverse sensitivity

15.3.2.4 *Development and subdivision design should not result in reverse sensitivity effects on adjacent sites, adjacent activities, or the wider receiving environment.*

Objective - Integrated development: efficient servicing

15.3.3 *Achieving the efficient and cost effective servicing of land by ensuring that servicing is provided to areas proposed to be developed.*

Policy - Co-ordination between servicing and development and subdivision

15.3.3.2 *Development and subdivisions shall:*

- a) *Be located in areas where infrastructural capacity has been planned and funded; and*
- b) *In areas subject to an approved structure plan, provide sufficient infrastructural capacity to meet the demand identified in the structure plan; and*
- c) *Achieve the lot yield anticipated in an approved structure plan; and*
- d) *Include infrastructure provision for both the strategic infrastructure network and local infrastructure connections.*

11.16 The abovementioned objectives and policies seek to ensure development is appropriately located to contribute to the community, enhances the character and amenity, and is located on site suitable for the intended use. With regard to Objective 15.3.1, I note the site design and layout is for an industrial activity in the Rural Zone, the nature of the activity, in my opinion, does not contribute or enhance the character and amenity of the Rural Zone, therefore the proposal is not consistent with this objective.

11.17 In terms of the site suitability and the capability to accommodate the activity under Objective 15.3.2 and its associated policies, the application has included an Engineering Infrastructure Report, prepared by Stiffe Hooker Ltd, which demonstrates the site can be used for the proposed development, therefore being

consistent with Policy 15.3.2.1. In terms of Policy 15.3.2.4, submissions have raised concern with regard to the application being able to address potential reverse sensitivity effects, as discussed above in Section 10 of this Report. It is my opinion that the existing consents under which the neighbouring activities operate addresses effects of the activities which could lead to complaints by new owners/occupiers of the subject site. Therefore the proposal is consistent with Policy 15.3.2.4.

- 11.18 With regard to Objective 15.3.3, this objective and its associated policies seek to ensure efficient and effective servicing of a site. In this instance, due to the Rural Zoning of the site, the proposal relies on on-site infrastructure to service any development as it is outside Council's reticulated network areas. Council's Development Engineers have confirmed the infrastructure can be designed and constructed to Council's necessary standards, and on this basis, the proposal is consistent with this objective and its associated policies.

Objective - Urban consolidation

15.3.4 To ensure urban consolidation will be achieved within the District, while also contributing to character and amenity outcomes.

Policy - Rural Zones: ensuring the productive potential of rural land

15.3.4.6 The minimum rural lot size requirement has been established to ensure the productive potential of rural land is retained for a range of farming activities.

Policy - Rural Zones: maintaining amenity and rural character

15.3.4.7 To ensure that development does not compromise the predominant character and amenity of the Rural Zone, subdivision design and layout shall:

- a) Avoid de facto settlements such as ribbon, or residential cluster development; and*
- b) Maintain the visual and environmental values of the area, including but not limited to, maintaining the integrity of landscape areas and viewshafts; and*
- c) Not compromise the ecological functioning of significant natural areas, e.g. peat lakes and biodiversity (indigenous forest) corridors, as defined on the Planning Maps; and other areas of biodiversity value.*

Policy - Rural Zones: infrastructure

15.3.4.8 To ensure that development does not give rise to demand or potential demand for the uneconomical and unplanned expansion of infrastructure services, or the upgrade of existing infrastructure, by avoiding residential cluster, ad hoc and ribbon development.

- 11.19 Objective 15.3.4 and its associated policies seek to ensure and encourage development within the existing urban framework, reducing the expansion of activities beyond the Waipā District's main centres and villages. Policies 15.3.4.6 and 15.3.4.7 outline the desire to retain the Rural Zone for rural activities, particularly noting farming activities and the maintenance of the rural character. Policy 15.3.4.8 acknowledges the intent to minimise undue expansion of infrastructure networks.
- 11.20 In terms of the proposal, it will add to or extend the existing industrial activities which are located along Wickham Street, within the Hamilton City boundary. While the receiving environment is semi-industrial, the proposal does not seek to consolidate industrial activities within the Industrial Zones of the District and is not consistent with the amenity or character of the Rural Zone. For this reason I consider the proposal to be inconsistent with Objective 15.3.4 and Policies 15.3.4.6 and 15.3.4.7.
- 11.21 With regard to Policy 15.3.4.8, the proposal seeks to utilise onsite servicing, however submissions have raised concern with anticipated future connections to the reticulated services within Hamilton City, hence this policy is noted here.

Section 16 – Transportation

- 11.22 Section 16 of the District Plan sets out its focus for an integrated approach to land use and transport. The objectives and policies within this section seek to ensure that the pattern of land use and that patterns interaction with the land transport system provides and maintains both a safe and efficient transport network for all users (i.e. vehicles, cyclists and pedestrians). The objectives and policies that are specifically relevant to this application are as follows:

Objective - Ensuring sustainable, integrated, safe, efficient and affordable multi-modal land transport systems

16.3.1 All new development, subdivision and transport infrastructure shall be designed and developed to contribute to a sustainable, safe, integrated, efficient (including energy efficient network design) and affordable multi-modal land transport system.

Objective - Integrating land use and transport: ensuring a pattern of land uses and a land transport system which is safe, effective and compatible

16.3.2 Land use and transport systems successfully interface with each other through attention to design, safety and amenity.

Policy - Integrating land use and transport

16.3.2.1 Development, subdivision and transport infrastructure shall be located, designed and managed to:

- a) *Minimise conflict on and across arterial routes and provide appropriate access; and*
- b) *Include access that is safe and appropriate for all road users, including those with restricted mobility; and*
- c) *Minimise the need for travel and transport where practicable; and*
- d) *Facilitate travel demand management opportunities where practicable.*

Policy - Safe roads

16.3.2.3 Development and subdivision design and construction shall contribute to a safe road environment, by:

- a) *Providing safe and appropriate locations for vehicle entrances, driveways, pedestrian and cycle routes; and*
- b) *Designing and locating transport networks, lighting, street furniture and landscaping to minimise conflict, maintain visibility, and provide for maintenance activities.*

Objective - Maintaining transport network efficiency

16.3.3 To maintain the ability of the transport network to distribute people and goods safely, efficiently and effectively.

Objective - Minimising adverse effects of the transport network

16.3.5 The transport network can have effects on the adjacent environment that must be mitigated through design.

11.23 The abovementioned objectives and policies all seek to maintain and support the transport network efficiency and effectiveness, while ensuring people are safe when using the network. Various submissions have raised traffic and safety effects as an area of concern. While noting the roading network utilised by the subject site is not within the Waipā District, it is my opinion, based on concerns raised in the submissions by both road controlling authorities, that safety effects cannot be mitigated through consent conditions, therefore the proposal would be inconsistent with these objectives and policies.

Summary of Objective and Policy Assessment

11.24 Overall, the above objective and policy summary has demonstrated the proposal is not consistent with the objectives and policies of Sections 1, 4, 15 and 16 of the District Plan. The existing environment is acknowledged as being semi-industrial, therefore does not align itself with the rural character described by the objectives

and policies within Section 4 of the District Plan. Additionally, as the site is not identified within an area for future industrial development, any further development or intensification of industrial activities on the site will therefore, in my opinion, be not consistent with Objective 1.3.2 and Policy 1.3.2.1. Overall, I consider the proposal to be contrary to the objectives and policies of the District Plan.

12 PROVISIONS OF OTHER STATUTORY PLANNING DOCUMENTS (SECTION 104(1)(B))

12.1 Pursuant to Section 104(1)(b), the consent authority must have regard to any relevant provisions of a national environmental standard, other regulations, a national policy statement, the regional policy statement and the regional plan. Below is an assessment of these provisions.

National Policy Statements

12.2 National Policy Statements (NPSs) are instruments issued under Section 52(2) of the Act that enable Government to prescribe objectives and policies for matters of national significance which are relevant to achieving the sustainable management purpose of the Act. An NPS may also give direction to local authorities as to how they need to give effect to the policies and objectives of the NPS. The current NPSs that are in effect are:

- National Policy Statement for Freshwater Management;
- National Policy Statement for Greenhouse Gas Emissions from Industrial Process Heat;
- National Policy Statement for Highly Productive Land;
- National Policy Statement for Indigenous Biodiversity;
- National Policy Statement for Renewable Electricity Generation;
- National Policy Statement on Electricity Transmission
- National Policy Statement on Urban Development; and
- New Zealand Coastal Policy Statement.

12.3 With regard to the NPSs listed above, further consideration with regard to this application is required under the National Policy Statement for Highly Productive Land and National Policy Statement on Urban Development.

National Policy Statement on Highly Productive Land

- 12.4 The National Policy Statement for Highly Productive Land ('NPS-HPL') took effect on 17 October 2022. The NPS-HPL requires New Zealand's most productive land to be identified and managed to prevent inappropriate subdivision, use and development, with its one, and only, objective stating "*Highly productive land is protected for use in land-based primary production, both now and for future generations*".
- 12.5 Council must give effect to the NPS-HPL, as if references to highly productive land were references to land that, at the commencement date is either zoned general rural, and LUC 1, 2 or 3, but is not identified for future urban development, or subject to a plan change to rezone it from rural to urban.
- 12.6 In terms of the subject site, NZLRI Mapping shows the site has Class 2 Land Use Capability Class. Refer to Diagram 15 below. Given this classification, and the lack of the site being identified for future urban development or subject to a plan change, the proposal requires further assessment under the NPS-HPL.

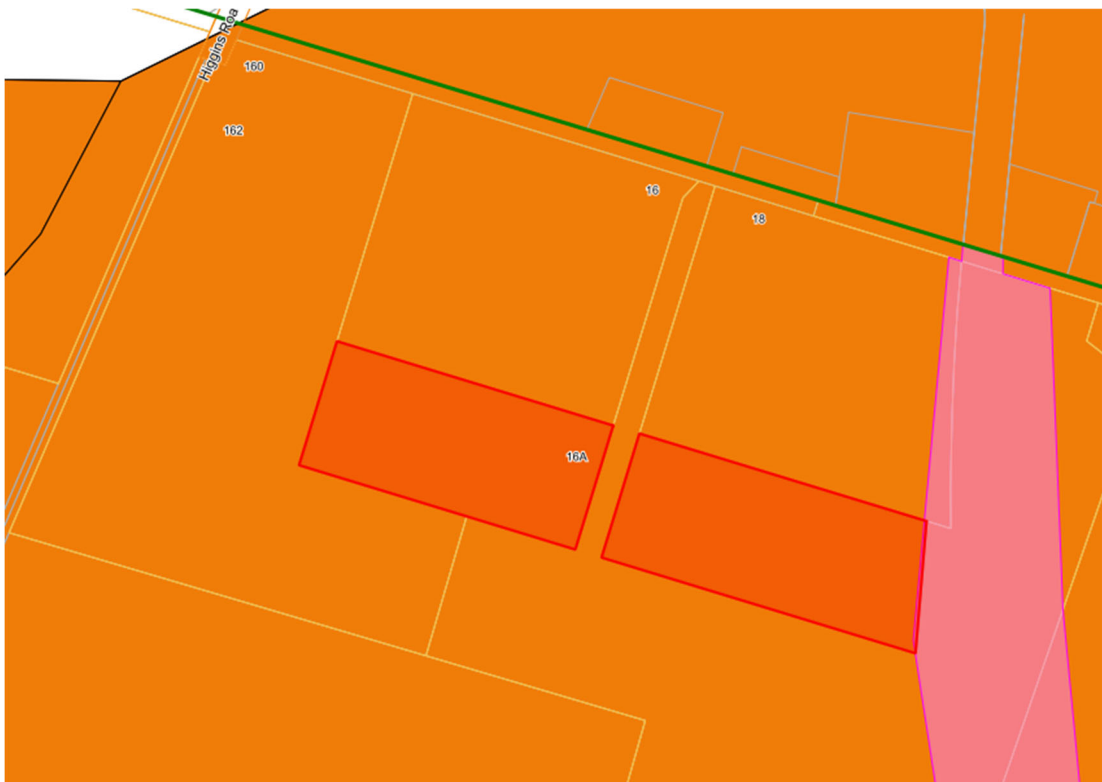


DIAGRAM 15: NZLRI LUC 2021 (LANDCARE RESEARCH) MAP (CLASS 2 SHOWN IN ORANGE, SITE HIGHLIGHTED IN RED)

- 12.7 In terms of the proposed development, the relevant policy for further consideration is Policy 8 which states "*Highly productive land is protected from inappropriate use and development*". Part 3.9(1) of the NPS clearly outlines authorities are to avoid inappropriate use of development of highly productive land, unless one of the criteria

within Section 3.9(2) apply. It is my opinion that none of the criteria within Part 3.9(2) apply to this site.

- 12.8 Part 3.10 of the NPS provides an exemption pathway for authorities to consider, subject to an applicant addressing Part 3.10(2) of the NPS. I note the application includes an assessment against the NPS-HPL in Section 10.4 of the application stating *“Given the site has already been established for consented industrial activities means the soil has already been compromised and it is unrealistic to think the site would ever be reinstated and converted back to rural production purposes. On this basis, we are satisfied that the proposal does not contravene the key directives of the NPSHPL.”* Unfortunately this does not satisfy the requirements of Part 3.10(1).
- 12.9 In summary, the application has not provided sufficient information demonstrating the proposal has considered the sites status with regard to highly productive land, and Council cannot be satisfied that the objective of the NPS-HPL is met.

National Policy Statement on Urban Development

- 12.10 The National Policy Statement on Urban Development 2020 (‘NPS-UD 2020’) was gazetted on 23 July 2020 and has legal effect from 20 August 2020. The NPS-UD 2020 has identified the Waipā District as a high-growth urban area and a tier 1 urban environment.
- 12.11 The NPS-UD 2020 recognises the national significance of:
- *“having well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future” and*
 - *“providing sufficient development capacity to meet the different needs of people and communities.”*
- 12.12 Council must give effect to the NPS-UD 2020 and the relevant objectives within the NPS are:
- *“Objective 1: New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.”*
 - *“Objective 3: Regional policy statements and district plans enable more people to live in, and more businesses and community services to be located in, areas of an urban environment in which one or more of the following apply:*
 - a) *the area is in or near a centre zone or other area with many employment opportunities*

- b) *the area is well-serviced by existing or planned public transport*
- c) *there is high demand for housing or for business land in the area, relative to other areas within the urban environment.”*
- *“Objective 4: New Zealand’s urban environments, including their amenity values, develop and change over time in response to the diverse and changing needs of people, communities, and future generations.”*
- *“Objective 6: Local authority decisions on urban development that affect urban environments are:*
 - a) *integrated with infrastructure planning and funding decisions; and*
 - b) *strategic over the medium term and long term; and*
 - c) *responsive, particularly in relation to proposals that would supply significant development capacity.”*

12.13 Throughout the supporting policies, the NPS-UD 2020 emphasises the need for local authorities to provide for well-functioning urban environments, that are integrated with infrastructure and strategic planning, and responsiveness to changing community demands. In terms of the proposed development, its location within the Waipā District, its roading connection to the Hamilton City Council roading network, and its physical location near the Hamilton City Council urban environment, leaves the future development of this area unknown. The identification of the site within the Strategic Boundary Agreement between the two Council’s (further discussed below in Section 11) provides some direction, however in terms of the NPS-UD, it is my opinion the proposal does not satisfy the objectives of the NPS-UD 2020.

National Environmental Standards

12.14 National Environmental Standards (‘NESs’) are regulations issued under Section 43 of the Act that prescribe technical and on-technical standards which apply across the country. The current NESs that are in effect are:

- National Environmental Standards for Air Quality;
- National Environmental Standards for Assessing and Managing Contaminants in Soil to Protect Human Health;
- National Environmental Standards for Electricity Transmission Activities;
- National Environmental Standards for Freshwater;
- National Environmental Standards for Greenhouse Gases from Industrial Process Heat;
- National Environmental Standards for Marine Aquaculture;

- National Environmental Standards for Commercial Forestry;
- National Environmental Standards for Sources of Human Drinking Water;
- National Environmental Standards for Storing Tyres Outdoors; and
- National Environmental Standards for Telecommunication Facilities.

12.15 Of the abovementioned NESs the NES for Assessing and Managing Contaminants in Soil to Protect Human Health requires further consideration with regard to this application.

National Environmental Standards for Assessing and Managing Contaminants in Soil to Protect Human Health

12.16 These regulations came into force on 1 January 2012 and apply when a person wants to do an activity described in Regulation 5(2) to 5(6) on a piece of land described in Regulation 5(7) or 5(8). Following a review of the information contained within Council’s records, the application site is identified on the Waipā District Council online maps as a potential HAIL site, being a verified A18 - Wood treatment or preservation including the commercial use of anti-sapstain chemicals during milling, or bulk storage of treated timber outside. The piece of land is therefore covered by Regulation 5(7)(c), being a piece of land on which *‘it is more likely than not that an activity or industry described in the HAIL has been undertaken’*.

12.17 The applicant has provided a Preliminary Site Investigation (‘PSI’) and Detailed Site Investigation (‘DSI’) prepared by Pattle Delamore Partners Ltd, dated 22 March 2023. This investigation has reviewed the site, the site history, investigated actual or potential areas of contamination across the site, determined if there is a risk to human health, and determined if consent is required under the NES.

12.18 The PSI and DSI conclude noting:

“In relation to the presence of soils above the relevant human health criteria for arsenic within the stockpile in Yard 6, it is considered that the stockpile soils (<5 m³) can be removed as a permitted activity under the NESCS as the volumes are within the allowable removal/disturbance volumes. In the interim (prior to removal), due to the elevated concentration of arsenic, this stockpile should not be disturbed and ideally covered with an impermeable layer until disposal to an approved facility (consented to accept the material) can be arranged. As outlined in Regulation 8(3)a, appropriate controls will need to be put in place to minimise the potential exposure of humans to mobilised contaminants.

Due to the investigation area soils reporting contaminant concentrations above background soil concentrations for heavy metals and laboratory LOR with

respect to hydrocarbons, it is likely a consent will be required under the NESCS should the permitted soil disturbance regulations not be able to be complied with for the proposed site development. If the permitted activity regulations cannot be complied with then a Controlled Activity consent would need to be sought under the NESCS regulations. It is not anticipated that the WRC Contaminated Land Rules for remediation are triggered for the site, on the basis that no adverse effects to the environment have been identified from the DSI.

A Contaminated Site Management Plan (CSMP) would likely be required under a Controlled Activity consent (as outlined in Regulation 9(2)b, to provide procedures and controls for disturbing/removing soils that contain contaminants above published background concentrations.

Overall, the contaminant concentrations detected within the investigation area are considered to be lot or limited in extent such that the potential risk to human health or for discharges to environmental receptors to occur are considered to be low.”

- 12.19 Section 5.2 of the application notes uncertainty regarding the volume of earthworks required, therefore an application has been made under Regulation 9(2)b of the National Environmental Standards for Assessing and Managing Contaminants in Soil to Protect Human Health for a Controlled Activity.

Waikato Regional Policy Statement: Te Tauākī Kaupapahere Te-Rohe O Waikato

- 12.20 Te Tauākī Kaupapahere Te-Rohe O Waikato provides an overview of the resource management issues in the Waikato Region, and the ways in which integrated management of the Region’s natural and physical resources will be achieved. It provides policies and a range of methods to achieve integrated outcomes for the region across resources, jurisdictional boundaries and agency functions, and guides development of sub-ordinate plans (regional as well as district) and consideration of resource consents. The objectives most relevant to this proposal are:

- **M-01 – Integrated management:** *Natural and physical resources are managed in a way that recognises:*
 1. *the inter-relationships within and values of water body catchments, riparian areas and wetlands, the coastal environment, the Hauraki Gulf and the Waikato River;*
 2. *natural processes that inherently occur without human management or interference;*
 3. *the complex interactions between air, water, land and all living things;*
 4. *the needs of current and future generations;*
 5. *the relationships between environmental, social, economic and cultural wellbeing;*

6. *the need to work with agencies, landowners, resource users and communities; and*
 7. *the interrelationship of natural resources with the built environment.*
- **IM-03 – Decision making:** *Resource management decision making is holistic and consistent and:*
 1. *is aligned across legislation and national and regional strategies;*
 2. *takes an integrated approach to managing resources that cross regional and functional boundaries;*
 3. *adopts an appropriate planning timeframe;*
 4. *adopts a precautionary approach, including the use of adaptive management, where appropriate, towards any proposed activity whose effects may be significant or irreversible but are as yet uncertain, unknown or little understood;*
 5. *is transparent;*
 6. *has regard to the potential for cumulative effects from activities;*
 7. *is based on the best available information, including mātauranga Māori;*
 8. *allows for flexible solutions for local variations;*
 9. *recognises that time may be needed for change to occur;*
 10. *includes working with tangata whenua;*
 11. *includes working with key stakeholders;*
 12. *considers a mix of methods to achieve objectives; and*
 13. *results in solutions which include processes to minimise conflicts.*
 - **IM-09 – Amenity**
 1. *The qualities and characteristics of areas and features, valued for their contribution to amenity, are maintained or enhanced; and*
 2. *Where intensification occurs in urban environments, built development results in attractive, healthy, safe and high-quality urban form which responds positively to local context whilst recognising that amenity values change over time in response to the changing needs of people, communities and future generations, and such changes are not, of themselves, an adverse effect.*
 - **UFD-01 – Built environment:** *Development of the built environment (including transport and other infrastructure) and associated land use occurs in an integrated, sustainable and planned manner which enables positive environmental, social, cultural and economic outcomes, including by:*
 1. *promoting positive indigenous biodiversity outcomes;*
 2. *preserving and protecting natural character, and protecting outstanding natural features and landscapes from inappropriate subdivision, use, and development;*

3. *integrating land use and infrastructure planning, including by ensuring that development of the built environment does not compromise the safe, efficient and effective operation of infrastructure corridors;*
4. *integrating land use and water planning, including to ensure that sufficient water is available to support future planned growth;*
5. *recognising and protecting the value and long-term benefits of regionally significant infrastructure;*
6. *protecting access to identified significant mineral resources;*
7. *minimising land use conflicts, including minimising potential for reverse sensitivity;*
8. *anticipating and responding to changing land use pressures outside the Waikato region which may impact on the built environment within the region;*
9. *providing for the development, operation, maintenance and upgrading of new and existing electricity transmission and renewable electricity generation activities including small and community scale generation;*
10. *promoting a viable and vibrant central business district in Hamilton city, with a supporting network of sub-regional and town centres; ~~and~~*
11. *providing for a range of commercial development to support the social and economic wellbeing of the region; and*
12. *strategically planning for growth and development to create responsive and well-functioning urban environments, that:*
 - a. *support reductions in greenhouse gas emissions and are resilient to the current and future effects of climate change;*
 - b. *improve housing choice, quality, and affordability;*
 - c. *enable a variety of homes that enable Māori to express their cultural traditions and norms;*
 - d. *ensure sufficient development capacity, supported by integrated infrastructure provision, for identified housing and business needs in the short, medium and long term;*
 - e. *improves connectivity within urban areas, particularly by active transport and public transport;*
 - f. *take into account the values and aspirations of hapū and iwi for urban development.*

12.21 Following on from the objectives are a number of supporting policies seeking to ensure an integrated approach to land use decision making and development of the built environment across the region. The proposed activity provides for an industrial use in the Rural Zone, abutting the territorial authority boundary. I do not consider the proposal to take an integrated approach to cross functional boundaries or provide for a land use to occur in an integrated, sustainable and planned manner. For

this reason, I consider the proposed application is in conflict with the provisions of Te Tauākī Kaupapahere Te-Rohe O Waikato.

Waikato Regional Plan

- 12.22 The Waikato Regional Plan 2007 ('the Regional Plan') is intended to provide direction regarding the use, development and protection of natural and physical resources in the Waikato Region. It gives effect to Te Tauākī Kaupapahere Te-Rohe O Waikato and helps the Regional Council carry out its functions under Section 30 of the Act. With regard to the Regional Plan, the applicant has sought and gained resource consent regarding the stormwater discharge pursuant to the provisions of the Regional Plan. A copy of the Regional Council consent is included in **Appendix 6**.

13 OTHER MATTERS (SECTION 104(1)(C))

Treaty Settlement Acts – Statutory Acknowledgement Areas and Areas of Interest

- 13.1 The property subject to this consent is not within a Statutory Acknowledgement Area. The site is within Ngāti Hauā Areas of Interest.

Tai Tumu, Tai Pari, Tai Ao – Waikato Tainui Iwi Environmental Management Plan

- 13.2 Tai Tumu, Tai Pan, Tai Ao purpose is to enhance collaborative participation between Waikato Tainui and agencies in resource and environmental management. It provides high level guidance on Waikato Tainui values, principles, knowledge and perspectives on, relationship with, and objectives for natural resources and the environment. The plan highlights the need for enhancement and protection of landscape and natural heritage values. The property is within the Waikato Tainui Joint Management Agreement Area and therefore the provisions of the Tai Tumu, Tai Pari, Tai Ao are relevant.
- 13.3 Section 21 – Te Whenua (Land) and Section 25 – Ngaa Whakaritenga Moo ngaa whenua o Waikato-Tainui (Land use planning) have been given particular regard in terms of this application. Section 25 outlines that as kaitiaki within their rohe, Waikato-Tainui seek to ensure environmental sustainability including consideration within the rural environment of the consequences of development on the environment. Policy 25.3.2.2 – Rural Development seeks to *“ensure that rural development is well planned, and the environmental, cultural, spiritual and social outcomes are positive”*.
- 13.4 The application has provided an assessment of the activity regarding Tai Tumu, Tai Pari, Tai Ao, and deemed the direction of the activity to *“not compromise the desired outcomes of”* Tai Tumu, Tai Pan, Tai Ao. I concur with this assessment.

Te Rautaki Tāmata Ao Turoa o Hauā — Ngāti Hauā Environmental Management Plan

- 13.5 Te Rautaki Tāmata Ao Turoa o Hauā explains the importance of communication between local authorities and Ngāti Hauā in terms of keeping the Iwi Trust informed about projects, providing a feedback loop and opportunity for relationship building. The plan clearly outlines that engagement is expected for earthworks activities and that the Iwi seek opportunities to participate in consent and site monitoring and restoration projects.
- 13.6 The property is within the Ngāti Hauā Area of Interest and therefore the provisions of Te Rautaki Tāmata Ao Turoa o Hauā are relevant. There is nothing in the application that will be in conflict with the desired outcomes of Te Rautaki Tāmata Ao Turoa o Hauā accordingly, I consider the proposal to be consistent with the plan.

Hamilton City Council and Waipā District Council Strategic Boundary Agreement

- 13.7 In September 2022, agreement was reached between Hamilton City Council and Waipā District Council regarding the land within the Waipā District north and west to the Southern Links Designation. Land within the identified areas, refer Diagram 16, has been agreed to be brought into Hamilton City jurisdiction at a future point in time. While it is acknowledged that the timeframe for the boundary change is unknown, the land resource within this area is agreed to be strategically managed, with a focus on retaining rural land for rural activities and use in the short term.

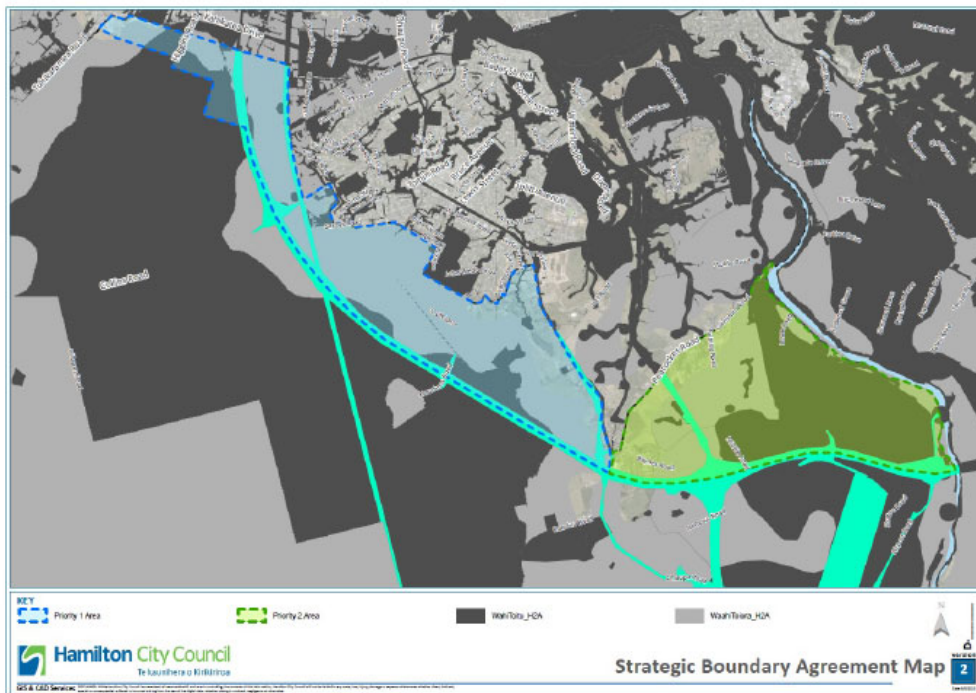


DIAGRAM 16: STRATEGIC BOUNDARY AGREEMENT MAP (PRIORITY AREA 1 SHOWN IN BLUE, PRIORITY AREA 2 SHOWN IN YELLOW)

13.8 The proposal to use the subject site for industrial purposes is contrary to the commitment made by Waipā District Council under this agreement.

14 SECTION 104D – THRESHOLD TEST

14.1 Section 104D of the Act establishes a ‘threshold’ or ‘gateway test’ that acts as an additional test for Non-Complying Activities to satisfy. In order to pass the threshold test, a consent authority must be satisfied that the adverse effects of the activity on the environment will be minor, or the activity will not be contrary to the objectives and policies of the District Plan.

14.2 The adverse effects of the proposed activity have been outlined and assessed in the application (refer Appendix 2), the Council’s Notification Report (refer Appendix 3), and Section 10 of this report. In summary:

- the Applicant’s Agent has concluded that the effects will be less the minor,
- Council’s Notification Report assessed the adverse effects to be below the ‘more than minor’ threshold and the proposal could be considered without the need for public notification; and
- Council’s Notification Report assessed the adverse effects with regard to industrial activity creep beyond the Hamilton City District boundary, traffic, building setback, and reverse sensitivity, on six of the surrounding parties will be minor.

14.3 Further assessment in Section 10 of this report concluded that the proposed traffic safety effects of the activity have not been demonstrated to be appropriately avoided, remedied or mitigated to an acceptable level. Based on this assessment, the adverse effects limb of the threshold test (i.e. the effects will be minor) is met.

14.4 With regard to the second limb of the threshold test, an assessment of the objectives and policies of the District Plan is outlined in Section 11 of this report. In conclusion, the proposed activity is deemed to be contrary to the objectives and policies of the District Plan, therefore the second limb of the threshold test is not met.

14.5 In summary, one limb of the ‘threshold test’ has been met, and Council may, pursuant to Section 104D, grant consent.

PART C – CONCLUSION & RECOMMENDATION

15 CONCLUSION

- 15.1 In conclusion, Industrie Property Rua Limited ('the Applicant') has applied for resource consent (land use) for the construction and establishment of a purpose-built Wattyl Ltd paint storage and distribution facility, and three warehouses and ancillary offices at 16A Wickham Street, Hamilton.
- 15.2 The application has been assessed as a Non-Complying Activity under the provisions of the Operative Waipā District Plan ('the District Plan') as 'industrial activities' to which this proposal is most suitably defined as, are not listed in the Activity Status Tables for the Rural Zone, defaulting to this activity status under Rule 4.4.1.5(b). In addition the site requires remediation due to contaminated soils being found across the site under the National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health as a Controlled Activity.
- 15.3 The application was processed with limited notification and received four submissions, with three being in opposition and one in support in part. Those submitters have raised valid concerns with the proposal which helped inform the effects assessment associated with traffic, three waters, reverse sensitivity and building setbacks.
- 15.4 An assessment of the environmental effects of the proposal is considered in Section 10 of this report pursuant to Section 104 of the Act. The conclusion of this assessment is that the proposed traffic safety effects of the activity, cannot be appropriately avoided, remedied or mitigated to an acceptable level.
- 15.5 An assessment of the objectives and policies of the District Plan has been undertaken in Section 11 of this report. The conclusion of that assessment is that the development is contrary to the objectives and policies of the District Plan.
- 15.6 The National Policy Statements, National Environmental Standards, the Regional Plan, Regional Policy Statement, and other non-statutory documents have been considered in this assessment. In summary, the proposal is not considered to be consistent with the National Policy Statement on Highly Productive Land, the National Policy Statement on Urban Development, the Waikato Regional Policy Statement or the Hamilton City Council and Waipā District Council Strategic Boundary Agreement.
- 15.7 An assessment of the application regarding Section 104D of the Act and the 'threshold' or 'gateway test' was undertaken in Section 14 of this report. The application is considered to pass part 104D(a), in that the effects will be minor, and

fail part 104D(b), as it will be contrary to the objectives and policies of the District Plan. Council may grant consent as one limb of the test has been met.

- 15.8 Having reviewed the application, submissions, and requirements under the Resource Management Act 1991, the proposal has qualities that lend itself to either grant or refusal, and the assessment in this case is very finely balanced. It is my opinion, based on the inability to mitigate traffic safety at known high risk intersections and lack of alignment with a number of the objectives and policy in the District Plan, Regional Policy Statement, and National Policy Statements, that the application should be refused consent.
- 15.9 In making this recommendation, I note the proposed site remediation under the provisions of the National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health could be granted separately from the landuse consent, and if the Commissioner wishes to do so, potential consent conditions are included in Appendix 7 of this report.

16 RECOMMENDATION

That:

- a) *The report of Hayley Thomas – Project Planner be received;*
- b) *In consideration of Sections 104, 104B, and 104D of the Resource Management Act 1991, the Waipā District Council **refuses** consent to Industre Property Rua Limited for the Construction and establishment of a storage and distribution facility and three warehouses and ancillary offices in the Rural Zone as a Non-Complying Activity under the Waipā District Plan at 16A Wickham Steet, Hamilton, legally described as Lot 1 DP 396081 & Lot 1 DP 486522; and*
- c) *In consideration of Sections 104 and 104A of the Resource Management Act 1991, the Waipā District Council grants consent to Industre Property Rua Limited for the Remediation of the site with regard to heavy metals and hydrocarbons as a Controlled Activity pursuant to the National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health and subject to the conditions in **Appendix 7**.*

Report prepared by:



Hayley Thomas
PROJECT PLANNER
Reviewed by:



Quentin Budd
CONSENTS TEAM LEADER

Approved for the Independent Hearing Commissioner by:



Wendy Robinson
MANAGER DISTRICT PLAN AND GROWTH