

IN THE MATTER

of the Resource Management Act 1991

AND

IN THE MATTER

of a Hearing to consider Variation 1 – Ruakura to
the Hamilton City Council Proposed District Plan

**Statement of Evidence of Peter Raymond Hall on behalf of
Tainui Group Holdings Ltd**

15 July 2016

Summary

1. My name is Peter Raymond Hall. I present this planning evidence on behalf of Tainui Group Holdings Ltd (TGH). TGH owns the largest landholdings in the variation area: some 478ha of land.
2. The submission by TGH strongly supported the variation but sought a number of changes, primarily to the specific methods of the variation (rules and maps) and its objectives, policies and explanatory text to better achieve the outcomes outlined in the submission.
3. I have read the evidence prepared on behalf of the Council and broadly agree with the conclusions of the Council's planning experts, except where identified in this evidence.
4. In my evidence I summarise the outstanding matters, propose revised provisions that would satisfy the matters raised in the TGH submission, and set out my planning opinion as to why these revised provisions better achieve the sustainable management purpose of the RMA 1991, including in terms of s32 of the Act.
5. My evidence proposes revisions to the variation provisions relating to the following matters and the planning reasons for these changes:
 - (a) Reverse sensitivity arising from the Percival-Ryburn Road Large Lot Residential Area;
 - (b) Managing effects on the amenity values of the Percival-Ryburn Road Large Lot Residential Enclave;
 - (c) Percival-Ryburn Road screen planting;
 - (d) Inland Port landscape screening rule;
 - (e) Direct connection to Percival and Ryburn Roads from the Logistics and Industrial Park Zones;
 - (f) Amendments to the Land Development Rule;
 - (g) Removal of the plan which maps LDP Areas;

- (h) Third party approval requirements and non-notification rules;
 - (i) Ruakura Industrial Park Zone minimum lot size;
 - (j) Deletion of a New Subdivision Policy;
 - (k) Location of the Ruakura Retail Centre;
 - (l) Resource consent for duplex dwellings;
 - (m) Indicative open space;
 - (n) Infrastructure provisions; and
 - (o) Noise provisions.
6. Subject to the changes I set out in in my evidence and as sought in the evidence of Ms Parekawhia Mclean on behalf of Te Whakakitenga o Waikato in relation to papakaainga, the variation will assist the Hamilton City Council to achieve the purpose of the RMA

Introduction

7. My name is Peter Raymond Hall. I am a Planner and Director at Boffa Miskell Limited, a national firm of consulting planners, ecologists and landscape architects.
8. I hold the qualifications of Bachelor of Planning (Auckland) and am a full member of the New Zealand Planning Institute. I have over 20 years' planning experience. During this time I have had positions in both local government and as a consultant planner.
9. I have undertaken a wide range planning policy and consenting work throughout New Zealand, with a particular emphasis on the Waikato, Auckland and Northland. This work has included planning policy preparation, district plan review and plan change preparation and assessment work.
10. I presented planning evidence to the 2014 Board of Inquiry ('BOI') on the Private Plan Change request by Tainui Group Holdings Limited ('TGH') and Chedworth Properties Limited ('CPL') jointly on behalf of both of these

parties. Others in Boffa Miskell undertook the original drafting of the Plan Change provisions for Ruakura which were submitted for consideration by the BOI. I was responsible significantly redrafting these provisions following expert caucusing and preparing s32AA assessments in support of these redrafted provisions.

11. I drafted the submissions and further submissions to Variation 1 ('the variation') on behalf of TGH, as well as provided feedback to Council officers on the preliminary draft version at its invitation.
12. I peer reviewed the Area A Inland Port Land Development Plan ('LDP') consent application which was prepared by others at Boffa Miskell, which was granted consent in March of this year and is discussed later in my evidence.
13. I appear on behalf of TGH.

Code of Conduct

14. I confirm that I have read the 'Code of Conduct for Expert Witnesses' as contained in the Environment Court Practice Note 2014. I agree to comply with this Code of Conduct. In particular, unless I state otherwise, this evidence is within my sphere of expertise and I have not omitted to consider material facts known to me that might alter or detract from the opinions I express.

Background

15. I have read the evidence prepared on behalf of the Council and broadly agree with the conclusions of the Council's planning experts, except where identified below.
16. TGH own the largest landholdings in the variation area: some 478ha of land (see the TGH ownership plan in relation to the variation area at **Attachment A**).
17. Ms Parekawhia Mclean on behalf of Te Whakakitenga o Waikato sets out in her evidence the background of the Ruakura land that is the subject of the variation. The land was returned to Waikato-Tainui as part of its Raupatu settlement in 1995 which saw the return of approximately 1.5%

of the land area that had been confiscated. The land remains very significant to Waikato-Tainui.

18. The submission by TGH supports the variation on the basis that the land represents a unique long term investment and development opportunity for Waikato-Tainui. It is a springboard of opportunity that will enable Waikato-Tainui to develop a strong economic base that is capable of providing growth, financial independence and social self-reliance. These points are further discussed in the evidence of Ms Mclean.
19. The TGH submission on the variation notes that the land use and zoning enabled by the variation and the associated structure plan:
 - (a) maximises the opportunities to create a range of land uses that in turn provide for a range of employment opportunities at Ruakura, and therefore achieving the role of a primary employment area in eastern Hamilton;
 - (b) maximises the synergies between existing and proposed land uses, as well as the relationships between land use, infrastructure and locational needs (e.g. inland port to rail network, the Waikato Expressway, and employment to residential);
 - (c) implements and effectively realises the live-work-play philosophy contained within the Hamilton Urban Growth Strategy and Future Proof, including providing a range of residential housing choices in close proximity to employment areas; and
 - (d) maximises a resident population within an easily accessible distance from the Hamilton CBD, while at the same time providing land uses which fulfil needs for residents in eastern Hamilton.
20. As described in the evidence of Mr Luke O'Dwyer for the Council, the variation gives effect to the BOI decision on the Ruakura Private Plan Change, a project declared to be of national significance by the Minister for the Environment¹. I agree with Mr O'Dwyer that the variation also includes provisions and a structure plan which have been the subject of

¹ Para 26, Section 42A Hearing Report of Luke O'Dwyer – Strategic Overview

considerable scrutiny by the BOI and confirmed to be appropriate by thorough significant expert investigation².

21. In my opinion, the variation subject to the change I have set out in this evidence, achieves integrated resource management by:

- (a) Providing a planning regime that responds to and coordinates the urbanisation objectives for Ruakura, including the industrial land allocation outcomes dictated by the Waikato Regional Policy Statement;
- (b) Ensuring a coordinated and comprehensive approach to the development of Ruakura, including for example connections to an overall road and open space network, and land use aligns with the overall allocation and pattern of the Structure Plan;
- (c) Providing appropriate objectives, policies and methods to manage all anticipated environmental effects arising from the land uses provided for; and
- (d) The variation will enable the nationally significant inland port to develop that will provide freight distribution efficiencies and increase employment in the City and Region.

22. Subject to the changes I seek in my evidence and as sought in the evidence of Ms Parekawhia Mclean on behalf of Te Whakakitenga o Waikato, the variation will assist the Hamilton City Council to achieve the purpose of the RMA by:

- (a) Promoting the sustainable management of natural and physical resources by enabling development of the land at Ruakura in a way that enables Waikato-Tainui and the wider Hamilton and Waikato communities to provide for their social, cultural and economic wellbeing (RMA s5(2)).
- (b) Meeting the reasonably foreseeable needs of future generations by responding to existing and anticipated future needs for land

² Para 28, Ibid

- demand at Hamilton, taking a long term approach to the development of this land and protecting natural resources at Ruakura (including for example, an industrial land allocation regime and creating an extensive network of new Open Space) (s5(2)(a)).
- (c) Including new provisions to ensure that the life-supporting capacity of air, water and ecosystems are safeguarded and ensuring that adverse effects on the environment are avoided, remedied or mitigated (including for example the LDP provisions in relation to ecological outcomes) (s5(2)(b) and (c)).
 - (d) Providing for the relationship of Maori and their culture and traditions with their ancestral lands, water, sites, waahi tapu and other taonga, by enabling development by Waikato-Tainui of their own land in a way that gives rise to the significant benefits to the tribe, thus recognising and providing for this matter of national importance (s6(e)), while also providing for the kaitiakitanga role of Waikato-Tainui (s7(a)).
 - (e) Providing for the efficient use and development of natural and physical resources and their finite characteristics, including by developing the variation area in a staged manner that accords with a Structure Plan, accords with a comprehensive growth approach for Hamilton City, and maximises the benefits of existing and planned infrastructure investment (s7(b) and (g)).
 - (f) Promoting efficiency of the end use of energy by agglomerating complementary land uses such as the Inland Port in immediate proximity to road and rail and promoting transport efficiency through land use (s7(ba)).
 - (g) Enhancing amenity values and the quality of the environment through the provision of a well-planned new urban area, incorporating an extensive network of open space (s7(c) and (f)).
 - (h) Enhancing the intrinsic value of ecosystems by enabling a significant improvement to the currently degraded waterways within the Plan Change area (s7(d)).

- (i) Enabling development of Treaty of Waitangi settlement land in a manner that provides significant benefits to Waikato-Tainui, thus taking into account the principles of the Treaty (s8). In my opinion, subject to the provision for papakainga in the Medium Density Residential Zone as requested in the evidence of Ms Mclean, the Plan Change also takes into account the Waikato-Tainui Environmental Plan - Tai Tumu, Tai Pari, Tai Ao, being a relevant planning documents recognised by an iwi authority, as required by section 74(2A) of the RMA.

- 23. The submission from TGH sought a number of changes, primarily to the specific methods of the variation (rules and maps) and its objectives, policies and explanatory text to better achieve the outcomes outlined above.

- 24. I have attended a number of meetings with Council officers with TGH since its submission on the variation. The amended variation provisions attached to the 42A evidence of Council addresses many of the matters raised in the submission.

- 25. In this evidence, I summarise the outstanding matters, propose revised provisions that would satisfy the matters raised in the TGH submission that are as yet unresolved, and set out my planning opinion as to why these revised provisions better achieve the sustainable management purpose of the RMA 1991.

- 26. I identify in my evidence where I have relied on evidence or background reports prepared by others in forming my own planning opinions. I also provide references to any documents that I have relied on in preparing my evidence.

Scope of Evidence

- 27. My evidence addresses the following matters:
 - (a) Reverse sensitivity arising from the Percival-Ryburn Road Large Lot Residential Area;
 - (b) Managing effects on the amenity values of the Percival-Ryburn Road Large Lot Residential Enclave;

- (c) Percival-Ryburn Road screen planting;
 - (d) Inland Port landscape screening rule;
 - (e) Direct connection to Percival and Ryburn Roads from the Logistics and Industrial Park Zones;
 - (f) Amendments to the Land Development Rule;
 - (g) Removal of the Figure which maps LDP Areas;
 - (h) Third party approval requirements and non-notification rules;
 - (i) Ruakura Industrial Park Zone minimum lot size;
 - (j) Deletion of a New Subdivision Policy;
 - (k) Location of the Ruakura Retail Centre;
 - (l) Resource consent for duplex dwellings;
 - (m) Indicative open space;
 - (n) Infrastructure provisions; and
 - (o) Noise provisions.
28. TGH lodged very similar submissions to CPL on the variation, with many relief points in common. In this regard, together they represent the two largest land owners in the variation area and both have land that is represented by the full range of zones under the variation (the exception being that only TGH has land in the Logistics Zone and Knowledge Zone).
29. I have prepared separate briefs of planning evidence on behalf of both TGH and CPL. To avoid repetition in my separate briefs of evidence I have cross referenced evidence between both briefs where appropriate.
30. Throughout my evidence where I have proposed changes to the Council's s42A version of the provisions, I have shown my changes as (grey highlighted underlines and ~~strikeouts~~).

Withdrawal/Clarification of Submission Points

31. In light of the evidence of Mr Styles, TGH no longer wishes to pursue its submission point which sought to add a new rule 4.4.3 requiring internal insulation on buildings and additions and alterations to buildings in the Ryburn/Percival Road area, but wishes to retain the relief pertaining to no-complaints covenants.
32. TGH also withdraws its relief which seeks to change the maximum site coverage from 50% to 45% in rule 4.6.6.
33. Following consultation with Transpower, TGH also confirms support for the as-notified provisions at Rule 25.7.5 Rules-Activity Status-Electricity National Grid Corridor and the related definitions and withdraws its submission which sought minor drafting changes to the rule and definitions.

Reverse Sensitivity arising from the Percival-Ryburn Road Large Lot Residential Area

34. I support the general policy approach proposed in the variation for the zoning of the Percival-Ryburn Road 'enclave' as it is referred to in Council evidence. This approach defers its rezoning as Logistics until a future District Plan review and includes acknowledgement both on the Structure Plan and in the text of this future zoning³.
35. While it could be argued that this approach is not immediately giving effect to the land release strategy of the WRPS, recognition of the long development timeframe at Ruakura is appropriate, with the area unlikely to be required for Logistics in the next planning period.
36. A two-fold risk remains however with this planning approach:

³ Presumably in error the Structure Plan Figure attached to Council's s42A evidence shows the Percival-Ryburn Road enclave as Large Lot Residential Zone. While this remains its zoning, my understand of the Council's 42A reporting is that should be shown as Logistics on the Structure Plan to denote its future zoning. I have marked up the plan at **Attachment B** to correct this error.

- (a) Firstly, continued development and fragmentation through subdivision of the Percival-Ryburn Road area will mean that its eventual conversion to Logistics will only be more difficult to achieve in the future⁴.
- (b) Secondly, if further residential development and subdivision is allowed, there is the risk of existing and future residential owners and occupiers seeking greater restrictions on the efficient development and use of the adjoining Logistics and Industry Park land (reverse sensitivity effects).
37. I note the valuation evidence of Mr Doug Saunders for the Council where he states that allowing the minimum lot size to be reduced from the 2 ha in the PDP would potentially create:
- 25 additional (58 in total) properties if subdivision was allowed to go to 5000m² minimum lot size; or
 - 92 additional titles (126 in total) if subdivision was allowed to go to a 2500m² minimum lot size⁵.
38. The residential land-use will however progressively become something of an anomaly given the urbanisation to Logistics and Industrial uses occurring around it. The enclave otherwise shares the same strategic advantages as the balance of the Logistics Zoned land: a location immediately north of the ECMT line, flat land and immediately accessible to major arterials including the future Ruakura Interchange of the Waikato Expressway.
39. In my opinion, the allowance of subdivision to 5000m² is a reasonable compromise in all of these circumstances, between a restriction on further subdivision at one end (almost the effect of the 2ha PDP minimum), and

⁴ Therefore running contrary to variation Objective 4.2.11 that *“Further development within the Large Lot Residential Enclave does not compromise and long-term future employment zoning of that land”*.

⁵ Section 5.2 of the Evidence of Doug Saunders on behalf of the Council

a more generous allowance (the 2500m² minimum sought by some other submitters). I agree with Ms Rolfe in this respect⁶.

40. This risk of reverse sensitivity effects on future Logistics and Industrial land uses which will hem the Percival-Ryburn Road enclave remains. Therefore, I only support the subdivision allowance where this reverse sensitivity risk is also appropriately managed.
41. The submission by TGH sought a two-fold approach to manage such reverse sensitivity risks: seeking new rules requiring both no-complaints covenants and controls on internal acoustic insulation for future dwellings.
42. For the latter, I accept the expert conclusions of both Mr Hunt on behalf of the Council and Mr Styles on behalf of TGH, that internal acoustic insulation is not necessary in this case given the relatively stringent noise controls that will exist between the Logistics and Industrial Park zones and the Percival-Ryburn Road enclave.
43. I agree however with Mr Styles (and disagree with Mr Hunt) that no-complaints covenants would in this instance be a useful planning method to deal with reverse sensitivity.
44. With reference to s32 of the RMA, the management of reverse sensitivity effects arising from the Percival-Ryburn Road enclave is necessary in the above circumstances to achieve the objectives of the District Plan (as amended by the variation) including to '*optimise the long term positive environmental, economic and social benefits of the Ruakura Logistics Zone*⁷ and industrial land uses are '*able to establish and operate in an efficient and effective manner*⁸.
45. Although the associated policies do not specifically refer to reverse sensitivity, managing such effects is critical if these objectives of optimising an efficient use of the Industrial land adjoining the Percival-

⁶ Section 42A Report on Subdivision, Ms Paula Rolfe, section 4.3.2

⁷ Objective 10.2.2

⁸ Objective 11.2.1

Ryburn Road enclave are to be met. Its existence in immediate proximity to new Industrial and Logistics Areas (including the inland port) means future risk of reverse sensitivity conflict between the two may be very real. This is particularly so where the subdivision provisions of the District Plan provide for further intensification. The greater number of people, the greater the expectation of amenity standards which may not exist.

46. I have proposed below a set of provisions to manage this risk of reverse sensitivity.
47. My deletions to the Explanation below are intended to remove text which references the current situation at Percival-Ryburn Road. Having detailed reference to the current environment where change is enabled is not good plan drafting practice in my opinion (for example, *‘there are approximately twenty-three existing houses...’*).
48. My replacement of policy 4.2.10b corrects what in my opinion is an out of place policy. As included in the variation, the policy deals with activities in the Inland Port, and is therefore out of place in the Residential section. In any event, the Logistics and Industrial Park Zones have policies which deal with the management of effects on residential activities, and in this context it is unhelpful to re-cast these in the residential section.
49. Policy 4.2.10b should more appropriately deal with effects arising from residential uses on logistics and industry, rather than the other way around as is currently drafted. I have therefore redrafted this policy as a reverse sensitivity policy. The policy seeks to avoid reverse sensitivity effects of existing and future residential use, development and subdivision in the Ryburn-Percival Large Lot enclave on the establishment and operation of industrial and logistics activities (including the inland port) at Ruakura.
50. My new reverse sensitivity policy is given effect to in part by the subdivision rules discussed above. Given however that the 5000m² minimum lot size will still enable some further subdivision (25 additional properties by Mr Saunders’ assessment) it is necessary to include in the Plan a mechanism which both alerts future landowners to the future land use change that will occur around them, and that limits their ability to restrict the optimisation and efficient development and operation of the adjoining Industrial Park and Logistics land through complaint. To this

end, I have drafted a new rule at 4.3.1 Activity Status Table that incorporates a requirement for a no complaints covenant.

51. Compared to the alternative of having no such rule, the new no complaints rule is the most appropriate way to achieve the existing objectives of the Plan I have outlined above⁹. They are a simple but effective method of alerting future land owners to the change that will occur around them. While I understand that no-complaints covenants may not be a fail-safe mechanism to avoid all complaints to the Council, they are an effective way of setting the expectations of future owners by providing an alert on titles. Registering a no complaints covenant on a title is not a significant cost, and in my opinion this cost is outweighed by the benefits of future owners in the Percival-Ryburn Road enclave being fully informed and restricted in their ability to complain against the Industrial and Logistics land use that will occur around them.
52. Without such a mechanism, I would support TGH's alternative relief sought in its submission of retaining the 2ha minimum lot size, thereby largely avoiding the increased reverse sensitivity risks I have outlined above.

(The changes I propose to the tracked variation provisions are shown as highlighted underlines and ~~strikeouts~~):

a) Amend Clause 4.1.4 Large Lot Residential as follows:

ii. Ruakura Structure Plan (Percival/Ryburn Roads)

The area bounded by Percival, Ryburn Roads and the designation for the Waikato Expressway, the East Coast Main Trunk railway (ECMT) and the approved inland port (Logistics Zone, Sub-Area A), is characterised by a range of large lot residential uses and some rural activities. This area is not serviced and is not intended to be serviced while it retains the Large Lot Residential zoning.

~~There are approximately twenty three existing houses and a number of subdivided but undeveloped properties in the enclave. The houses and~~

⁹ RMA Section 32(1)(b)

outdoor living areas tend to be oriented to the north and north-east and away from the western leg of Percival Road, and to the north-west and north in relation to the northern leg of Percival Road. Typically the houses are more than 30 metres from the zone boundary. Percival Road has the character of a quiet country road being a cul de sac. It joins to Ruakura Road to provide the sole link to the wider City network and the community facilities in the eastern suburbs.

A feature of the area is a more-or-less continuous row of plane trees adjacent to the western leg of Percival Road and a more limited and shorter row of plane trees on the northern leg of Percival Road.

This area is also planned in the Ruakura Structure Plan to transition to the Ruakura Logistics Zone in future district plans. Future subdivision of this area into further large lot residential lots, therefore, is not encouraged. Future subdivision of this area into further large lot residential lots, therefore, is not encouraged. However, to protect manage effects on amenity a buffer will be necessary at the interface between the land intended to support the expansion of the inland port and future development in the Industrial Park Zone and the residential area. Interface design control measures are therefore adopted in 10.5.4 and 11.5.3 to mitigate avoid, remedy or mitigate significant adverse effects on the potential and actual effects on residential amenity resulting from the development of the inland port and related activities adjacent to the enclave.

In order to avoid adverse reverse sensitivity effects from the residential area on the establishment and operation of the inland port and the Logistics and Industrial Park Zones, requirements for no-complaints covenants are placed on subdivision in the residential area

Establishment of the buffer Compliance with these rules is a pre-condition to future development of the inland port in this area and is a requirement of the relevant Land Development Plan.

The conversion of the rural residential area to a Logistics zoning will require a change or variation to be made to the District Plan when there is sufficient information and certainty about the timing and need for the

'new' zoning. This is consistent with the staged industrial land allocation provided in the Regional Policy Statement.

b) Delete Policy 4.2.10b and replace as follows:

4.2.10b

~~Minimise future adverse amenity effects on the surrounding environment associated with the development of the inland port and its facilities.~~

~~Avoid reverse sensitivity effects of existing and future residential use, development and subdivision in the Ryburn-Percival Large Lot enclave on the establishment and operation of industrial and logistics activities (including the inland port) at Ruakura.~~

c) Amend 4.3.1 Activity Status Table – General Residential Zone, Residential Intensification Zone and Large Lot Residential Zone to add the following:

~~The use of buildings for any residential activity in the Percival/ Ryburn Roads Ruakura Structure Plan Area is a permitted activity where the site is subject to a restrictive no-complaint covenant* in favour of adjoining Industrial Park and Logistics Zoned land.~~

~~The use of buildings for any residential activity in the Percival/ Ryburn Roads Ruakura Structure Plan Area is a discretionary activity where the site is not subject to a restrictive no-complaint covenant* in favour of adjoining Industrial Park and Logistics Zoned land.~~

~~* For the purposes of this rule a 'restrictive no-complaint covenant' is defined as a restrictive covenant registered on the Title to the property or a binding agreement to covenant, in favour of Ruakura Limited¹⁰ or successors in title of the adjoining Industrial Park and Logistics Zoned land, by the landowner (and binding any successors in title) not to complain as to effects generated by the lawful establishment and~~

¹⁰ Note (not for the rule): The TGH land around the Percival/Ryburn enclave is held by "Ruakura Limited".

operation of the Industrial Park and Logistics Zoned land (including the inland port).

Managing Effects on the Amenity Values of the Percival-Ryburn Road Large Lot Residential Enclave

53. The variation includes a policy approach to managing adverse effects which seeks to 'protect' the amenity values of the Percival-Ryburn Road Large Lot Residential enclave¹¹.
54. This policy approach of protecting amenity sets the bar too high, where urbanisation of the type and scale provided for by the variation is proposed to effectively encircle the Percival-Ryburn Road Large Lot Residential enclave.
55. At present, this area's amenity values are characterised by large rural-residential properties surrounded by paddocks on three sides, with the ECMT line to the south.
56. This predominantly rural amenity will not be able to be maintained with urbanisation. It is reasonable to expect however that future development will be able to guarantee at least an appropriate level of residential amenity for the enclave through mitigation of effects such as lighting, glare and noise.
57. The risk in my view is that the term 'protect' can be read in absolute terms. For example 'by being visible to us, the new industrial building has not protected our existing outlook'.
58. This would appear to be Mr Lister's read of the policy approach where he promotes provisions which 'maintain' existing amenity values (in other words, keep the same). This certainly will not be achievable in relation to

¹¹ Variation objective 4.2.10 as amended in the s42 report seeks to "*Protect the amenity values of the Percival-Ryburn Road Large Lot Residential Enclave, while providing for the urbanisation of the balance area consistent with the vision for the Ruakura Structure Plan*".

the Percival-Ryburn Road Large Lot Residential enclave given the extent of change proposed around¹².

59. This in my view illustrates the importance of ensuring the wording of the policy is accurate and that it clearly prescribes the anticipated outcome. This policy approach has particular relevance when considering the landscape buffer provisions I discuss below.
60. In my opinion, a requirement to 'avoid, remedy or mitigate adverse effects' on the amenity values of the enclave is more appropriate.
61. While I acknowledge that the requirement to either 'protect' is qualified by 'while providing for the urbanisation', the starting point of the policy as drafted is to protect amenity values and I read that as still the ultimate requirement.
62. I acknowledge that the policy, with its requirement to protect amenity values, comes from the BOI decision. There is an important difference however. The BOI decision only dealt with the relationship of the Inland Port to the Percival-Ryburn Road enclave along its southern boundary and not the balance of the Logistics and Industrial Park land on its western and northern boundaries provided for under this variation.
63. The Inland Port is separated from the nearest residential properties at Percival-Ryburn Road by Ryburn Road itself, then the ECMT, then the 20-metre landscape buffer area of the Inland Port. Protecting amenity is a more realistic objective in these circumstances, whereas in the case of the plan change the BOI dealt with, the balance of land around the enclave remained rural. Now with it converting to Industrial and Logistics on three sides, protection of amenity no longer remains an appropriate objective.
64. I therefore support the wording sought by TGH in its submission as follows:

(The changes I propose to the tracked variation provisions are shown as highlighted underlines and ~~strikeouts~~):

¹² Paragraph 3.8 of the evidence of Gavin Lister on the variation

Amend Objective 4.2.10 as follows:

4.2.10

~~Protect~~ Avoid, remedy or mitigate adverse effects on the amenity values of the Percival – Ryburn Road Large Lot Residential enclave, while providing for the urbanisation of the balance area consistent with the vision for the Ruakura Structure Plan Area.

Percival-Ryburn Road Screen Planting

65. TGH sought in its submission the following changes to the Landscape Buffer Rule which applies in the Logistics and Industrial Park zones along the western and northern sides of the Percival-Ryburn Road enclave:
- a) A reduction from a 20-metre landscape requirement to a 10-metre landscape requirement;
 - b) Removal of specific references to the composition of the landscaping buffer in the rule (for example '*retention of the existing pine trees*' and '*a dense evergreen hedge*'); and
 - c) The removal of the requirement to establish landscaping 'prior to development of any land' within the Logistics Zone (sub area B) and the Industrial Park Zone (north of Percival Road).
66. The reasons for these changes sought were that the width and specificity of this landscaping rule is unnecessary to achieve its purpose of screening the majority of large buildings. The landscaping strip and setback proposed in the variation will impose considerable costs in the form of opportunity lost for the development of adjoining logistics land and significantly impact on the efficient use and development of that land. Such costs will outweigh any additional marginal benefits from the wider buffer area proposed. The length of the boundaries on which the control will apply, at a depth of 30-metres (20-metre landscaping + 10 metre building setback), will result in the loss of some 3.5ha of logistics and industrial land to buffers.
67. The TGH submission notes that its proposed alternative landscape buffer of 10 metres, plus a 10-metre yard, will allow for both high

vegetation and under planting to succeed, as well as ample building setback for amenity purposes. The existing Percival Road provides a generous separation distance in addition to this buffer.

68. Mr Lister has responded to this issue in his s42A evidence for the Council and that is addressed in turn by Mr Goodwin for TGH.
69. Mr Lister has accepted the 10-metre landscape buffer in his evidence, subject to retention of the plane trees, the ability to establish a 12 metre high hedge, gaps in the plane trees to be filled in, and avoiding access through the buffer.
70. Mr Goodwin agrees with this approach and I accept their landscape evidence in this regard.
71. Several points remain that require clarification and further refinement in the rule.
72. First, Mr Lister in his discussion of the TGH submission states at paragraph 3.8 that the purpose of the buffer is to *“maintain amenity rather than simply “screening the majority of large buildings”*. As I note in my discussion above about amenity, it is an important principle that the purpose of the buffer is not to maintain amenity. That would require a form of buffer that either retained existing rural outlook or completely screened new Industrial and Logistics from view. That is not a realistic outcome. In fact policy 4.2.10d specifically refers to establishing and maintaining a buffer of screen planting capable of screening *‘most of the building bulk of development’* associated with activities in the Logistics Zone and Inland Port Zone.
73. Secondly, the ‘prior to any development’ trigger for the establishment of the landscape buffers remains in the s42A version. This is not a practical requirement in the circumstances where ground levels of the Industrial and Logistics sites may need to alter before construction, and in any event whole site earthworks would be required prior to construction.
74. Thirdly, a new subclause c) has been added to both versions of the rule in the Logistics and Industrial Park Zones. The content of this new subclause which restricts vehicular access from the new industrial areas to

the existing Ryburn and Percival Roads is acceptable as I discuss below in my evidence. The sub-clause also adds a restriction on car parking within the buffer.

75. While this is a sensible outcome in relation to the 10-metre landscape section of the buffer, as drafted, it would prevent carparking and access also from the building setback area. I would envisage that such areas behind the Industrial and Logistics buildings would be used as yards and it would certainly be desirable that they are available for vehicle circulation and access around the building and potentially for parking. This is particularly the case where the amenity standards sought for the Logistics and Industrial Park Zones tend to dictate a building form that discourages street front parking. Consequential changes are necessary to reflect the fact that the buffer area is comprised of both landscape and yard area, rather than just being a 'Landscape Buffer Area'.
76. Lastly, while the cumulative 30-metre requirement from the rule (20m+10m) has been removed from the Logistics Zone version of the Rule (10.5.4.3) it remains in the Industrial Park Zone version of the Rule (11.5.3). I assume this is a drafting error and a carryover from when the rule required 20 metres of landscaping plus 10 metres of setback, rather than 10 metres and 10 metres as now proposed.
77. I propose the following changes to rules 10.5.4 and 11.5.3 to address the above matters:

(The changes I propose to the tracked variation provisions are shown as highlighted underlines and ~~strikeouts~~):

Amend Rule 10.5.4 as follows:

~~10.5.4 Stage Three (North of East Coast Main Trunk railway)~~

- a) ~~Prior to the development of any land within the Ruakura Logistics Zone Sub Area B (north of East Coast main trunk railway) the A Landscape Buffer Area outlined in Appendix 2-~~

14 and Appendix 17 Planning Maps shall be established provided in accordance with the rule below.

- b) The Landscape Buffer Area (as indicated in Figure 10.5.4.3a below) is to include:
- i. Retention of the existing plane trees (and planting of additional trees to fill the gaps) and replacement planting where necessary;
 - ii. On the boundary of landscape buffer area (i.e. the furthest furthest from Percival Road) a dense evergreen hedge to no less than 12m in height;
 - iii. A 210m setback consisting of an informal band of indigenous vegetation to provide understory planting between the hedge and the road boundary;
 - iv. A 10m building setback within the relevant Ruakura Logistics Zone from the edge of the 210m indigenous vegetation outlined in 10.5.4.3 b) iii. above.
 - v. A 30m setback from Percival Road consisting of 10.5.4.3 b) i., ii., iii. and iv.
- c) No vehicle access is to be provided to any site through the 10m landscape width of the buffer area identified in b)iii) above and no car parking is permitted within this section of the buffer. Any departure of this rule c) is to be considered as a non-complying activity (see 10.3bb)

11.5.3 Landscape Screening

North of eastEast coastCoast mainMain trunkTrunk railway

- a) Prior to the development of any land within the Ruakura Industrial Park Zone (north of Percival Road) the following applies within the A Landscape Buffer Area outlined in Appendix 2 Figure 2-14 and Appendix 17 Planning Maps shall be established provided in accordance with the rule below.
- b) Landscape Buffer Area (as indicated in Figure 11.5.3a below) to include:

- i. Retention of the existing plane trees (and planting of additional trees to fill the gaps) and replacement planting where necessary;
- ii. On the boundary of Landscape Buffer Area (i.e. the furthestest furthest from Percival Road) a dense evergreen hedge to no less than 12m in height;
- iii. A 10m setback consisting of an informal band of indigenous vegetation to provide understory planting between the hedge and the road boundary;
- iv. A 10m building setback within the relevant Ruakura Industrial Park Zone from the edge of the 20m-10m indigenous vegetation outlined in 11.5.3b) iii. above;
- v. A 30m setback from Percival Road consisting of 11.5.3b) i., ii., iii. and iv.

c) No vehicle access is to be provided to any site through the 10m landscape width of the buffer area identified in b)iii above and no car parking is permitted within this section of the buffer. Any departure of this rule c) is to be considered as a non-complying activity (see 11.3kk).

Inland Port Landscape Screening Rule

- 78. The submission by TGH sought to amend rules 10.5.4.1 and 10.5.4.2 to remove specific references to staging, landscaping shown on Figure 2-17 and to specific locations of landscaping.
- 79. The purpose of this submission was to update the BOI decision version of the rule, to ensure it aligned with the layout, staging and landscaping from the LDP for the Inland Port which was granted on 1 March 2016¹³ (“the Inland Port LDP Consent”) (see consented Inland Port LDP Plans at **Attachment C**) while still maintaining the purpose of the rule which is to screen the inland port from sensitive land uses.

¹³ Land Use Resource Consent 010.2015.00008413.001 – Land Development Plan for LDP Area A and Part Area C, E & F.

80. The LDP for the Inland Port provides for an initial two stage roll-out of the inland port from the west, before future expansion area to the east is taken up. I have in **Attachment C** two of the consented LDP plans which show these first two stages, and their associated landscaping.
81. Consented **Stage 1** provides for a truck based inland port which extends as far east as the existing Percival Road.
82. Consented **Stage 2** provides for a rail siding off the ECMT, with a footprint extending further eastwards and the existing alignment of Percival Road closed and moved to the east.
83. In order to accommodate this consented staging, rules 10.5.4.1 and 10.5.4.2 need to be amended, together with their associated figure 2-17. Figure 2-17 as included in the variation also shows an underlying configuration of container stacks which is now out of date, and in any event serves no purpose on the figure as it is not related to a rule.
84. I attach accordingly at **Attachment D** to my evidence a redraft of rules 10.5.4.1 and 10.5.4.2 which aligns with the approved staging. I have also included the updated Figure 2-17 (this is the same as that previously provided to the Council and included as Appendix D to the s42A report of Sam Le Heron). In summary, the revised rules and associated figure:
- a) Remove the underlying configuration of container stacks.
 - b) Provide for landscaping requirements which align with the west to east roll out of the Inland Port as follows:
 - Stage 1:** Up to the existing Percival Road (the first 5-metre landscape strip).
 - Stage 2:** Up to the consented eastern extent of the Inland Port (the second eastward 5-metre landscape strip on the new Percival Road), allowing for the removal of the first 5-metre landscape strip (Interim Landscaping with the red cross-hatch) on Percival Road as this will now be built over.
 - Stage 3:** the balance of the Inland Port to its full eastward extent provided for by the zoning.

85. In answer to the questions raised in the officers' reports, the landscape requirements remain the same. They are simply allowed to be staged according to the west to east roll out of the Inland Port. The northern edge requirements remain the same. For these reasons I consider appropriate that the variation incorporate these updated rules and Figure. In particular:

- a) The tapering 20-metre buffer area adjoining Ryburn Road remains the same, although this is now allowed to be done in stages. A dark green stage 3 section of the tapered landscape section is included to allow for the eventual removal of the stage 2 siding connection to the ECMT when it is moved eastwards with stage 3.
- b) The intent of the BOI decision version of providing a northern edge landscape strip to the Inland Port is retained and strengthened in the provisions. A northern interim landscape strip is now required with the first stage of the Inland Port in a position adjacent the noise wall and entirely outside of the National Grid Yard.
- c) The 100 metre zone setback from Ryburn Road where containers are only allowed to be stacked to 12 metres is retained.
- d) The National Grid Yards and Corridors remain the same, with the same restrictions on under planting from the BOI decision version.
- e) The intent of the BOI decision version of also screening the eastern end of the Inland Port with a 5m wide edge is maintained, with this now being allowed to move eastwards with the stages of the Inland Port, and redundant internal interim landscaping removed.

Direct Connection to Percival and Ryburn Roads from the Logistics and Industrial Park Zones

86. A number of submitters sought that heavy vehicles be prohibited from Percival and Ryburn Roads noting the potential effects that would arise from the new Industrial and Logistics land use adjoining. I agree with the sentiments of these submissions, but not the methods proposed in the submissions to resolve the concern. A ban on heavy vehicles on these roads would impact equally on the submitters' own use of their properties

(for example a landowner may have their own truck and for deliveries and construction). In addition, the rural land on the eastern side of the proposed expressway will be served by a new Ryburn Road underpass. Being rural land, this will require access by heavy vehicles.

87. I support the alternative and more targeted method proposed by officers in the s42A report to not allow direct connections across the landscape buffer from the new Industrial Park and Logistics Areas directly to Percival and Ryburn Roads – in effect a vehicle access restriction which applies to these roads (the restriction might be usefully mapped as one as well for completeness). The new recommend policy 3.7.2.4e which supports this vehicle access restriction requires some further refinement to be more accurate.
88. As drafted in the s42A version of the variation provisions, policy 3.7.2.4e states that there will be no direct connection to properties in the Ruakura Logistics Zone and the Industrial Park Zone from the currently formed Percival and Ryburn Roads.
89. I understand that the use of the ‘currently formed’ Percival and Ryburn Roads is intended to address the fact that the existing section of Percival Road where it crosses the ECMT line will be closed to allow for the inland port¹⁴.
90. I would prefer a tighter description of the Percival and Ryburn Roads, given the change that could occur in the life of the Plan and the fact that the Logistics land to the south of the ECMT could access a remnant section of Percival Road. I have suggested alternative wording for proposed new policy 3.7.2.4e below.
91. The changes I recommend more accurately define the Percival and Ryburn Roads as north of the ECMT line, and therefore will apply the vehicle restriction only to these sections of road. I have deleted the reference to land development areas, consistent with the relief sought below in my evidence.

(The changes I propose to the tracked variation provisions are shown as highlighted underlines and strikeouts)

Amend Policy 3.7.2.4e as follows:

“There will be no direct connection to properties in the Ruakura Logistics (Land Development Plan Area P) and the Ruakura Industrial Park Zone (Land Development Plan Area F) from the currently formed Percival and Ryburn Roads north of the East Coast Main Trunk Railway”.

Amendments to the Land Development Rule

92. I support the Land Development method in the variation. The rule is an extension of that developed during expert planning caucusing during the BOI process and ultimately included in the BOI’s decision. My support is subject to some refinements which I set out in my evidence.
93. With reference to the recent Environment Court declaration¹⁵, in my opinion the Land Development rule 3.7.3.2 correctly consents uses of land (e.g. ‘preparation of land for land development purposes including earthworks and vegetation removal’ etc.) rather than consenting a ‘plan’. The Land Development Plan itself is required as an information requirement rather than being consented as a separate activity. Correctly in my opinion, there is no rule which seeks to bind subsequent consents to the content of the Land Development Plan.
94. The variation has added a rule to 3.7.3.2 Land Development Plans which makes land development and new buildings in the absence of a Land Development Plan as a non-complying activity:

“c) Land development and new buildings in the absence of a Land Development Plan is Non Complying”.

¹⁵ Interim Decision [2016] NZEnvC 056/Decision [2016] NZEnvC 065

95. This approach is repeated for subdivision in the Ruakura Medium Density Residential Zone in Subdivision table 23.3b in the s42a revisions version as follows:

“xiii Any subdivision within an approved LDP, or an LDP and subdivision activity, except for I and iv above”. – NC (Non Complying).

96. In my opinion both rules should be deleted (with consequential amendments elsewhere as set out in the TGH and CPL submissions) for the following reasons:

- a) My understanding of the RMA 1991 is that activity status cannot be determined by the existence of a consent that itself is not part of the District Plan. A resource consent is not a requirement specified in the Plan (such as a rule), but instead is something that is issued. Activity status is derived from the RMA, plans and proposed plans, not from resource consents. I understand that the final version of the Auckland Unitary Plan Framework Plan provisions that were handed to the Court after its interim decision and before its final decision responded to this issue by removing the equivalent provisions.
- b) From a planning perspective it can be desirable, and provide for more integrated outcomes, to lodge both subdivision consent applications and LDP applications at the same time. They essentially provide for the same subject matter. The s42A drafting of the subdivision section would trigger a non-complying activity consent for the subdivision rather a restricted discretionary activity. The LDP application for Medium Density area J which has been granted to CPL was lodged and processed simultaneously with its subdivision consent, allowing for integrated consideration of LDP and subdivision matters.
- c) In section 32 RMA terms there is no real risk of subdivision and development occurring before an LDP is granted. I address this further below in my discussion of the LDP demarcation question, but in summary there is every incentive for landowners to first obtain LDP consent and in practical terms, given the broad reach of LDP triggers (for example earthworks) no real prospect of a stand-alone development slipping through the LDP consent net.

97. As a further minor revision, and to be consistent with the approach to consent ‘activities’ rather than a ‘plan’, I also recommend that the word ‘plan’ be deleted from the rule heading at 3.7.3.2 as follows:

“3.7.3.2 Land Development ~~Plan~~”

98. I note also that this heading will be consistent with the BOI version of the provision.

Removal of the Plan which Maps LDP Areas

99. The submission by TGH sought the deletion of Figure 2-16 Land Development Plan Areas and associated plan text references in the variation. Figure 2-16 Land Development Plan Areas¹⁶ divides the Ruakura Structure Plan area into 22 “Land Development Areas”.
100. The background to the provision is set out in the s42A evidence of Mr O’Dwyer, Mr Kivell and Ms Rolfe in their section 42A reports. In practice the Land Development Areas has proved to be an impractical division of the Structure Plan area and unnecessary for resource management purposes.
101. By way of illustration, two of the three LDPs that have been lodged with the Council have deviated from the mapped LDP areas.
102. In my opinion, these deviations illustrate why the technique of mapping LDP areas is impractical. In particular:
- (a) The mapped LPD areas do not necessarily follow internal cadastral boundaries; meaning in whatever form, they are an arbitrary division of much larger land holdings;
 - (b) The factors influencing the extent of LDP areas are many and multi-layered and more complex than a single mapped overlay can accommodate (for example earthworks and stormwater

¹⁶ Renumbered 2-17 Land Development Areas in the 42A report.

considerations), meaning the demarked areas quickly become redundant (and in some instances already are);

Example 1: Consented LDP Area A by TGH is for the first stage of the Inland Port and associated logistics and stormwater pond. It spans areas Area A and Part Area C, E & F of the operative LDP areas. The extent of this LDP was dictated by: the anticipated demand for inland port land and logistics land area meaning not the full inland port extent of area A was taken up; the practicalities of infrastructure provision and associated developments staging; and the land required to manage stormwater through the provision of a large stormwater control pond in the south eastern corner of the site.

Example 2: The LDP which has been lodged for areas M, I, L and K (“area MILK”) traverses four of the LDP’s identified in the variation, rendering the separation into these individual areas as unnecessary. This wider area for this LDP was chosen for reasons of earthworks, stormwater and efficiency.

103. While I acknowledge that the variation has addressed the Example 1 situation by expanding the extent of area A to cover the consented area A, this in my opinion proves the point that fixing the extent of LDP areas in the District Plan is an inappropriate method. The District Plan through the variation has had to ‘play catch up’ with only the second LDP resource consent that has been issued.
104. District Plans do not normally prescribe the extent of a site that may be subject to a resource consent at any one time. This is for good reason, as it is recognised that there are complex range of development and market reasons which dictate the extent of development.
105. Mr Kivell summarises in his report that the Council wish to retain the LDP demarcation method so as to avoid the breakdown of greenfields areas on an ad hoc and potentially incremental basis, and thereby not achieve the vision set out in section 3.7a for Ruakura¹⁷.

¹⁷ Page 21 of Appendix A to Mr Kivell’s S42A report

106. In my opinion, there is no real risk of ad hoc and incremental development if the demarcation of the LDP areas are removed for the following reasons:
- (a) There are significant incentives for landowners to obtain consent for a larger comprehensive LDP area rather than smaller areas on an ad-hoc basis.
 - (b) The nature of the Land Development consent triggers means that very little, if any, development whatever its size could occur at Ruakura without a Land Development consent. The broad scope of one of these activity triggers at 3.7.3.2.1 Consent for Land Development includes the *“Preparation of land for land development purposes including earthworks and vegetation removal”*. With this Land Development consent trigger ground could not be turned on a new development, no matter the size, with the need for the Land Development consent. Therefore there is no risk of the objectives not being achieved without this method.
 - (c) The land at Ruakura is in limited ownership and not fragmented, such that encouragement of agglomeration of the sites through LDP areas is not required to achieve the comprehensive development vision for Ruakura.
 - (d) The infrastructure required to service the land at Ruakura is required to be developer funded and therefore this is a further incentive to consent larger LDP areas (eg. The wastewater line needs to run from the top of the growth cell down to the Inland Port).
107. In section 32(1)(a) terms the demarcation of the LDP areas is not the most appropriate nor is it an efficient or effective way to achieve the comprehensive development objectives for Ruakura. While the ability remains under the variation to apply for an ‘entire or staged section’ of an LDP Area¹⁸, the demarcation of these areas has been shown already by LDP consents consented and applied for to be incorrect and serves

¹⁸ Rule 3.7.3.2.1 (b) – note sub-clause (b) is missing in the variation mark-up version of this rule attached to the s42A reports

little resource management purpose given the circumstances I have set out above.

108. I therefore propose the following revisions to the LPD provisions:

a) Deletion of Figure 2-16 Ruakura Land Development Plan Areas from Appendix 2 Structure Plans

b) Revision of the header of Rule 3.7.3.2 as follows:

3.7.3.2 Land Development Plan”

c) Deletion of Clauses b) and c) of the Rule 3.7.3.2 as follows:

b) The Ruakura Structure Plan is divided into a number of Land Development Plan Areas (as shown in Figure 2-16 Appendix 2 Structure Plans) that provide the general basis for the preparation of these plans.

....

c) Land development and new buildings in the absence of a Land Development Plan is Non Complying

d) Deletion of rule xiii in table 23.3b of the Subdivision Chapter as follows:

“xiii Any subdivision within an approved LDP, or an LDP and subdivision activity, except for i and iv above”.—NC (Non Complying).

109. As a consequence to the above, the Spine Road Construction trigger rule at 3.7.3.3 e) is no longer appropriate. Rule 3.7.3.3 e) Staging and Traffic Requirements ties the commencement of activities to the construction of Spine Road relating to various mapped LDP areas and requires it to be ‘constructed as part of the LDP application’.

110. Setting aside the incorrect requirement for something to be constructed as part of an application, neither sub clause is required and should be deleted. For the Industrial land and development in the Knowledge Zone, rule 3.7.3.3.1 already includes various triggers for the construction of the Spine Road. The Spine Road has been advanced in relation to

the CPL medium density residential area already through the Area J and Area MILK LDPs.

111. I therefore also propose **deletion of rule 3.7.3.3 e).**

Third Party Approval Requirements and Non-Notification Rules

112. The submission by TGH sought changes to Notification Rule 3.7.3.2. The rule provides that except as provided under the specified clauses of the RMA, activities identified with an asterisk (*) in the relevant zone chapter shall be considered without notification or the need to obtain approval from affected persons. The exception given is for applications generating 1500 or more vehicle movements per day shall be limited notified to the New Zealand Transport Agency (NZTA), Waikato Regional Council (WRC) and the Waikato District Council (WDC) unless they have given their affected party approval status.

113. Several structural issues arise with the rule:

(a) Structurally the rule would appear to be out of place in the provisions. It sits as a sub-clause to section 3.7.3.2 Land Development Plan, yet has notification provisions which apply to many other chapters in the Plan. Each of the zone chapters relevant to Ruakura lists restricted discretionary activities with an asterisk (*) and these need to be supported by a generally applicable non-notification rule, rather than one which is a subset to the Land Development Rule.

(b) In isolation, the rule can be interpreted as only requiring the written approval of NZTA, WRC and WDC for applications generating 1500 or more vehicle movements per day. My reading of the discussion of Mr Kivell's s42A evidence is that the intention is to make the rule consistent with the BOI decision, which would mean LDP applications also require the written approval of these parties¹⁹. This might be the case by virtue of the rule's placement under rule 3.7.3.2 Land Development Plan, but it is unclear drafting. It is also potentially

¹⁹ Page 91 Appendix A S42A Evidence of Mr Kivell on Chapter 3.7 Structure Plans

inconsistent with the BOI decision version where, apart from LDP applications and those generating 1500 or more vehicle movements per day, other restricted discretionary activities marked with an asterisk (*) do not require the written approvals of NZTA, WRC and WDC to be dealt with non-notified. I suspect this is an error of transplanting the generally applicable BOI decision version of the rule into the LDP section.

114. Those structural issues aside I support the removal of WRC and WDC from the list of parties whose written approvals are required for LDP applications and those generating more than 1500 or more vehicle movements per day. For such applications in the Medium Density Residential Zone, I also support the removal of NZTA in addition to WDC and WRC.

115. My reasons are as follows:

(a) The background to the requirements is that it was introduced through the BOI at expert caucusing to allow relevant road controlling authorities to consider LDP applications. WDC and WRC sought status as an affected party through this process when the status of the WEX designation, and its impact on the wider network and the roads of the adjoining Waikato District was not finally determined through the designation process. There is no longer uncertainty in that respect with the designation and associated road layout confirmed.

(b) Both the WDC and the WRC have provided their written approvals for the Area J (CPL) and Area A (TGH) LDP applications (both significant areas of development), without any adverse effects identified on or by either party. The written approval for area MILK was being sought at the time of filing this evidence.

(c) The WRC is able to consider the regional consent implications of Land Development when those applications are made to them (for example regional earthworks, water diversion and discharge consents). Removal of affected party status does not remove the Council's duties in this respect.

(d) The NZTA, WDC and WRC are not excluded from being identified as affected parties for any discretionary activity applications which step outside the provisions for Ruakura. In particular, under rule 3.7.3.3.6 Staging Activity Status, any application not in accordance with the staging rules (including the sequencing and allocation of Industrial land) is a fully discretionary activity. In my opinion, full affected party consideration is appropriate for the NZTA, WDC and WRC given their wider regional transport focus. However, involvement with LDP applications within the prescribed staging limits is unnecessary.

(e) For LDP applications for residential development in the Medium Density Residential Zone, my understanding of the transport analysis is that the traffic from these developments can be readily accommodated in the existing and planned road network. Take for example the agreed position between the Council's, TGH's and CPL's traffic experts that the medium density residential staging rule is no longer required due to the connection to Wairere Drive already being in place.

116. The rule should be recast and/or repositioned in the provisions to ensure it is generally applicable to each of the chapters relevant to Ruakura which list restricted discretionary activities with an asterisk (*), with these activities being consistent with those provided in the BOI decision version. This includes for example the affected party status triggered by such activities if they generate 1500 or more vehicle movements per day.

117. As it relates to Land Development applications under section 3.7.3.2, I propose that the rule be redrafted as follows:

3.7.3.2.2 Notification Rule

a) Except as provided for by sections 95A(2)(b) and (c), 95B(3) and 95C(1) to (4) of the Act, applications for a Land Development consent under rule 3.7.3.2 shall be considered without notification or the need to obtain approval from affected persons except that:

i) the application shall be limited notified to New Zealand Transport Agency unless it has given its written approval or the application for a Land Development consent applies to the Medium Density Residential Zone.

Ruakura Industrial Park Zone Minimum Lot Size

118. The submission by TGH sought that the Ruakura Industrial Park Zone minimum lot size in Chapter 23 Subdivision be decreased from 3000m² to 500m².
119. The BOI applied the Operative Plan Industrial standards to both the Ruakura Industrial Park and Ruakura Logistics Zones, which provides for a minimum lot size of 500m² or 1000m² if fronting a major arterial road under the operative provisions²⁰. The variation as-notified proposed to increase this minimum lots size to 3000m².
120. The s42A prepared by Paula Rolfe on Chapter 23 Subdivision sets out the rationale for applying a larger minimum lots size to the Ruakura Industrial Zones than applies to other Industrial Zones in the City²¹. I accept those reasons insofar as they relate to the Ruakura Logistics Zone. Here the agglomeration benefits of logistics associated with the Inland Port are best served by large allotment sizes which can accommodate warehousing. Aside from the rule in the Plan, this is an outcome the market will dictate in any event (a single logistics warehouse building can be several hectares in area).
121. For the Ruakura Industrial Park Zone, I do not consider that a 3000m² minimum lot size is necessary to achieve the objectives of the Plan, having regard to the matters set out in s32 of the Act. Nor do I agree with the alternative method put forward by Ms Rolfe in her 42A revised provisions at 23.7.1 Allotment Size and Shape (v) and w)) which seek to apply either a minimum lot size of 500m² or 1000m², depending on the activity provided for.
122. Having considered the evidence of Ms Rolfe, including her comparison of how the PDP (after mediation) deals with other Industrial Zones in the City, I consider that a minimum lot size of 1000m² for front, corner or

²⁰ Hamilton City Operative District Plan Rule 6.3.2b)

²¹ Page 1, Appendix A, S42A Report of Paula Rolfe on Chapter 23 Subdivision

through sites and 500m² for rear sites is appropriate for the Ruakura Industrial Park Zone.

123. In my opinion, there is no resource management justification to apply minimum lot sizes for the Ruakura Industrial Park Zone that differ from other Industrial Zones in the City (Industrial Zone, Rotokauri Employment Area, Riverlea Industrial Area and Frankton Employment Area). The section 32 cost will be to disadvantage the Ruakura Industrial Park Zone compared to these other Industrial Zones, whereby it is not able to offer the same parcel size range to the market. Given the fact that large majority of the Ruakura Industrial Park Zone is in a single ownership (TGH) and that this is in close proximity to the Inland Port, there is little risk that the overall pattern of landuse will differ from that sought in the Zone's objectives.
124. While it is anticipated that allotment sizes in the Ruakura Industrial Park Zone will be larger than the minimums specified, there still needs to be the ability to subdivide down to 1000m² or 500m² to provide for the range of activities provided for.
125. An examination of the Ruakura Industrial Park Zone activity table at 11.3 shows that a wide range of industrial and associated uses are provided for (excluding noxious or offensive activities). This wide range of activities requires a mixture of allotment sizes. By way of example, the site size requirements of a permitted small industrial service activity such as small machinery repair differ considerably to those of a large warehousing operation. Providing for this full range of permitted activities with lot sizes to suit is critical for the success of the zone – including its ability to accommodate activities which serve and enjoy agglomeration benefits to the Inland Port. Controlling land use through allotment size, as is sought in the variation, is a blunt tool which will not achieve the objective of the zone.
126. The lot size restriction proposed by the variation is not supported by the zone's Objectives or Policies, nor by the specified purpose of the zone. These seek to establish a zone with provisions that ensure it is not

occupied by land uses that are non-industrial²², that are appropriate to the Industrial Park and surrounding environment and able to operate in an efficient and effective manner²³, that create a high amenity industrial environment²⁴, and that avoid or mitigate adverse effects²⁵. None of these outcomes are disputed; however they do not support a rule which specifies a larger minimum lot size compared to other Industrial Zones in Hamilton.

127. Ms Rolfe's alternative approach is problematic, as it ties subdivision size to land use. Land titles endure, while land uses are subject to change. While the method may allow for initial comprehensive assessment of land use and subdivision to achieve compliance, difficulties arise when land use subsequently changes, as it should be allowed to in order to enable a thriving and competitive Industrial Zone. In effect, it will fix certain smaller sites to certain land uses. For this reason it is not good or normal planning practice to tie allotment sizes to land use. Again, the method will have the cost of disadvantaging Ruakura compared to other Industrial Areas.
128. I propose the following changes to Table 23.7.1 Allotment Size and Shape to make the Ruakura Industrial Park zone consistent with the majority of other Industrial Zones in Hamilton.

(The changes I propose to the tracked variation provisions are shown as highlighted underlines and ~~strikeouts~~):

²² Ruakura Industrial Park Zone "Purpose 11.1e)"

²³ Objective 11.2.1

²⁴ Objective 11.2.2

²⁵ Objective 11.2.3

Amend Table 23.7.1 as follows:

u) Ruakura Logistics Zone and Ruakura Industrial Park Zone	3500m ²			Rule 23.7.1 (xz) applies
v) Ruakura Industrial Park Zone	Front, corner or through site – 1000m ²			Rule 23.7.1 (z) applies
	Rear sites - 500m ²			
v) Ruakura Logistics and Ruakura Industrial Park Zones for food and beverage outlets to accommodate the established use	500m ²			Rule 23.7.1(z) applies
w) Ruakura Industrial Park Zone for wholesale retail and trade supplies, drive-through services, commercial motor vehicle sales and servicing, emergency service facilities, passenger transport facilities and childcare facilities to accommodate the established use.	1000m ²			Rule 23.7.1(z) applies

New Subdivision Policy

129. The s42A report introduces the following new policy in the subdivision section:

“23.2.3b Subdivision that creates additional allotments in the Medium Residential Zone [sic] at Ruakura shall ensure a mixture of section sizes and lot widths within each street to provide:

i. For a mixture of housing typologies

ii. For higher density housing in particular around public open spaces and retail centre

iii. For housing to face the street creating an interactive environment

iv. High quality public spaces, street and reserves for the community”.

130. The s42A report of Ms Rolfe at page 4 of Appendix A attributes the new policy to relief sought in CPL's and TGH's deferred PDP submission points D913.065 and D1171.029 which sought the deletion of the preceding objective 23.2.3 and policy 23.2.3a. That relief is no longer sought through the variation process. Notwithstanding this, Ms Rolfe attributes the addition of the new policy as acceptance in part of the original CPL and TGH relief. In my view, this change is outside of the scope of the relief originally sought.
131. Aside from that procedural issue, the new policy is in my opinion unnecessary and does not add to the consideration of subdivisions and LDP applications already available to the Council. Its requirement to achieve a 'mixture of section sizes and lot widths' has been shown by LDPs for Area J and MILK to be readily achievable overall, and results from master planning dealing with irregular super lots sizes and response to market demand to deliver a variety of product. Apply this to 'within each street' is furthermore unnecessarily prescriptive in these circumstances.
132. In my opinion the proposed new policy 23.2.3b should be **deleted**.

Location of the Ruakura Retail Centre

133. The submission from TGH sought that the location of the Ruakura Retail Centre shown on the variation Figure 2-14 Structure Plan be noted as 'Indicative' rather than fixed.
134. The size and makeup of the Ruakura Retail Centre (including retail consent thresholds) was the subject of considerable evidence before the BOI and was not otherwise sought to be changed by TGH in its submission.
135. As an overall comment, in my opinion the detail of Structure Plans should be shown and referred to as indicative rather than fixed. There are a number of submission points from TGH on this point and I support that general approach.
136. The Ruakura Structure Plan at Figure 2-14 is at a scale and level of specificity which precedes detailed master planning, Land Development Consent, subdivision, survey and zoning and therefore should only be regarded as an indicative arrangement of land uses, roads and open space.
137. The Ruakura Retail Centre is intended on the Structure Plan as an overlay to the Knowledge Zone, although it is not shown as such (shown as a dark blue instead of the Knowledge Zone's light blue).
138. The Ruakura Retail Centre is not a separate zone nor is it a sub-zone of the Knowledge Zone. Instead it sits within the Precinct C area of the Knowledge Zone.
139. The final extent, shape and location of the Ruakura Retail Centre is to be determined through Land Development Consent, with specific assessment criteria to achieve good urban design outcomes. This is within the overall GFA size thresholds specified in the rule (which for example limit to GFA of the activities specified to 15,000m² before a non-complying consent is triggered).
140. TGH has sought my advice recently as part of considering options for the design and location of the Ruakura Retail Centre. Such a location could include a shift of the centre from its current position, however still

within Precinct C of the Knowledge Zone (this being the only zone at Ruakura with provisions which enable the establish of this form of Retail Centre, other than a smaller local centre in the Medium Density Residential zone).

141. I agree with Mr Gray in his traffic evidence for the Council where he notes that changes (to the Ruakura Retail Centre location and access arrangements) could be put forward for assessment as part of LDP's and subdivision applications with appropriate reasoning and assessment to manage traffic effects²⁶.
142. In my view, the LDP process, with assessment process under the criteria I have footnoted below, is the most appropriate time to confirm the exact extent, location and access arrangements for the Retail Centre in the Knowledge Zone area C.
143. For these reasons, the Ruakura Retail Centre is appropriately shown as indicative on Figure 2-14 Structure Plan by amending it as shown in my **Attachment B**.

Resource Consent for Duplex Dwellings

144. In its submission on the variation, TGH sought to reduce the consent threshold for the Medium Density Residential buildings from a site area of 400m² to a site area of 250m² (irrespective also if it is semi-detached, duplex or terrace housing). This was the same relief sought by CPL.
145. My evidence on behalf of CPL discusses this in detail and seeks the following relief, which is consistent with that sought by TGH:
146. The **additional controls recommended in the s42A report** and included in the followings clauses should be **deleted**:
- a) 4.6.5 Permeable Surface
 - b) 4.6.7 Building Height

²⁶ Page 15, para 28, Statement of Evidence of Alastair Gray on the Proposed Variation

- c) 4.8.2 Building Setbacks
- d) 4.8.3 Interface between Public and Private
- e) 4.8.6 Service Areas

147. In addition, rule 4.5.4 Activity Status Table- Ruakura Medium-Density Residential Zone should be amended as follows:

(The changes I propose to the tracked variation provisions are shown as highlighted underlines and strikeouts):

Amend Table 4.5.4 as follows:

a) <i>Single dwelling Residential buildings on sites 400m² or greater</i>	<i>P</i>
b) <i>Residential buildings on sites 399m² or less</i>	<i>RD*</i>
c) <u><i>Semi-detached, dDuplex dwellings on sites 299m² or less and apartments terrace housing</i></u>	<u><i>RD*</i></u>
d) <u><i>Duplex dwellings on sites 300m² or greater</i></u>	<u><i>P</i></u>

Infrastructure Provisions

148. The submission by TGH sought changes to the Ruakura Strategic Infrastructure provisions at 3.7.1 Structure Plan Components and at 3.7.3.3. At a high level, the provisions as notified were unclear as to how they applied, with explanations of the future infrastructure provision drafted as requirements or rules, requirements for the provision of infrastructure needs outside of the Ruakura Structure Plan area, inaccurate description of infrastructure outcomes and staging. They also did not align with the current state of agreements between TGH and CPL on certain infrastructure matters pertaining to their respective LDPs, and did not provide sufficient flexibility of outcomes to allow for alternative, including interim, solutions.

149. Some of these matters have been attended to in the section 42A version of these provisions, however in my opinion several more changes are appropriate. I will set these out in turn below.

Overall Explanation

150. A new overall explanation to sections 3.7.1.7 to 3.7.1.12 has been added in the section 42A version as follows²⁷:

Ruakura Strategic Infrastructure

The Ruakura Strategic Infrastructure that is to be provided in advance of all urban development is set out below.

151. While the intent is useful, the explanation provided is inaccurate. The LDP process provides for Strategic Infrastructure to be developed in conjunction with land development, not in advance. I propose the following revision to this clause:

Ruakura Strategic Infrastructure

The Ruakura Strategic Infrastructure that is to be provided in ~~advance of~~ all conjunction with urban development is set out below.

Transport Network

152. The explanation of the Transport Network section at 3.7.1.7 specify that strategic water and wastewater infrastructure will locate in the road corridors identified. Mr Mitchelmore in his evidence for TGH notes that while the width of the road corridor has been agreed, the width of the strip required for drainage and open space are still subject to detailed design.
153. In these circumstances it is appropriate to provide flexibility to recognise that strategic water and wastewater infrastructure could also occupy the adjoining open space. I have amended these provisions accordingly.

²⁷ Page 3-53

154. In addition, there is a requirement for staged completion of sections of the Spine Road (central) prior to, instead of in conjunction with, development of Land Development Plan areas G and R.
155. I have also adopted the recommendations of Mr Apeldoorn to sub clause d) concerning the Spine Road where he considers that the description detracts from the integrity of the purpose of the road section. He notes that the PDP contains definitions of road hierarchy that are consistent on a city wide basis, and it is in accordance with this approach that the hierarchy for this section of road has been determined²⁸.
156. I have also adopted the change recommended by Mr Apeldoorn to clause 3.7.3.3 c) where in relation to the Knowledge Zone he notes there are other triggers for transportation upgrades in that Zone and these are not necessarily linked to the construction of the Spine Road. In other words, sub clause 3.7.3.3 c) is an over simplification of the detailed staging rules set out later in 3.7.3.3 insofar as they relate to the Knowledge Zone.

(The changes I propose to the tracked variation provisions are shown as highlighted underlines and ~~strikeouts~~):

Amend 3.7.1.7 Transportation Network as follows:

...

- d) *The Spine Road North is a minor arterial to the north of Greenhill Link Road and provides strategic connectivity to the future residential development in the north. This will be a two-lane minor arterial road, with direct property access on the western side and intersection only access on the eastern side of the Spine Road. The corridor will provide for public transport, on-street parking, a shared walking and cycle path and swales for stormwater management. Strategic wastewater and water infrastructure will co-locate within the corridor, including in*

²⁸ Appendix C of the Evidence for TGH of Mark Apeldoorn in the variation

adjoining open space, coupled with the underground 110kv Transpower transmission line.

- e) The **Spine Road (central)** will be a two-lane minor arterial road south of Greenhill Link Road to the Fifth Avenue extension. ~~The form and function of this road is to primarily service residential and industrial development through intersection access.~~ The corridor provides for public transport, parking, shared footpath and cycle path and a swale area for stormwater management. Strategic wastewater and water infrastructure will co-locate within this corridor, including in adjoining open space, coupled with the underground 110kv Transpower transmission line through the Medium Density Residential Zone north of Fairview Downs. There is a requirement for staged completion of sections of the Spine Road (central) ~~prior to~~ in conjunction with development of Land Development Plan areas G and R.
- f) **Fifth Avenue Extension** will initially be two-lane with provision for a four-lane major arterial road extending the Cross City Connector arterial network from Wairere Drive to the Spine Road. The corridor provides for public transport, a shared walking and cycle path and a swale area for stormwater management.
- g) The **Spine Road (south)** will initially be two-lane with provision for a four-lane major arterial road from Fifth Avenue south to Ruakura Road West. This extends the Cross City Connector arterial to the Ruakura Industrial Park area. This section includes a four-lane road bridge over the East Coast Main Trunk Railway. ~~At ground level. The~~ The corridor provides for public transport, shared footpath and cycleway and a swale area for stormwater management. Strategic wastewater and water infrastructure will co-locate within the corridor, including in adjoining open space.

Amend Clause 3.7.3.3 c) as follows:

- c) It is noted that the Industrial Stage 2 development ~~and the Precinct C development within the Knowledge Zone~~ are is subject to the Waikato Expressway (Hamilton section) being completed

and connected to the Ruakura Structure Plan or suitable arterial network capacity being demonstrated or established in a manner that maintains the efficiency, safety and functioning of the transport network. It is considered that where construction is underway and a completion date is available some flexibility on further land release may be appropriate to ensure benefits are obtained from infrastructure at the earliest possible date and development to cater for market demand is not unduly delayed.

Water and Wastewater

157. Clause 3.7.1.10(a) specifies that a single water reservoir will be provided to service the entire structure plan and sets out its indicative location and the location of the bulk trunk network. Mr Mitchelmore notes in his evidence that for both technical and funding reasons clause 3.7.1.10(a) no longer reflects the position the parties have agreed and should be amended accordingly. I understand that the current thinking is for two 12mgl reservoir, rather than a single reservoir.
158. Mr Mitchelmore notes that the reference in 3.7.1.10(b) to ‘whole of life costs’ is a detailed design matter that normally is considered by the Council at the time of engineering approval for each stage of development. I agree with him that this principal need not be specified in the District Plan and that there a range of other matters beyond whole of life costs which influence whether engineering approval is granted, including whether the proposal is the appropriate type of infrastructure, material specifications, optimal infrastructure capacity requirements, location as well as likely capital and operating costs. I agree with him that 3.7.1.10(b) should be deleted.
159. Mr Mitchelmore in his evidence notes that Wastewater sections 3.7.1.10(c) and (e) of the variation do not reflect the Council’s new requirements and these requirements do not need to be a prescribed in the District Plan because they can unnecessarily constrain the provision of fit for purpose infrastructure in other ways.
160. I propose the following amendments in response to these matters:

Amend 3.7.1.10 Water and Wastewater as follows:

- a) A single reservoir is proposed to meet the demand and level of service requirements for the entire development of the structure plan. The single reservoir will also need to support the wider existing and future City needs. Figure 2-15B Ruakura Strategic Infrastructure shows an indicative location for a reservoir, at the highest point of the structure plan area within the existing AgResearch site, and indicative bulk mains connecting to the City network at Wairere Drive and Peachgrove Road. The development of the strategic infrastructure and the supporting bulk and trunk network will be secured through Land Development Plans. It is expected the potable water supply needs of the Ruakura Structure Plan area will be satisfied by the extension of the citywide bulk water supply network in general accordance with Figure 2-15B, as approved from time to time by the Council. The potable water storage capacity needs of the Ruakura Structure Plan area will be provided by additional reservoir storage to be located in general accordance with Figure 2-15B. The bulk and trunk network will shall be located within the vested transport corridor, or otherwise provided by easement over private land.
- b) Any Land Development Plan application will need to be supported by an assessment of options taking account of the whole of life costs for any proposed public infrastructure.
- c) The strategic wastewater solution at Wairere Drive/Crosby Road has been developed to service future development needs for both the Ruakura Structure Plan and Peacocke Structure Plan areas. This strategic wastewater solution wastewater interceptor is to be extended east and then south along the Spine Road to a point south of the East Coast Main Trunk railway line and to Ruakura Road. Beyond the Ruakura Structure Plan the wastewater interceptor will continue to service planned intensification growth areas for the City.
- d) Provision shall be made to extend the wastewater interceptor across the Waikato River and into the Peacocke Structure Plan area in a manner envisaged by Council's Wastewater Master Plan.

~~e) It is Council's expectation that the entire structure plan area will be serviced in a manner that seeks to avoid the need for any vested pumping stations.~~

Indicative Infrastructure Development Programme

161. Mr Mitchelmore considers that clause 3.7.1.11 should either be deleted or amended to be less prescriptive, including to recognise that the assets may be either vested in or acquired by the Council.
162. In my opinion, a simple addition to clause b is all that is required to recognise that assets may be either vested in or acquired by the Council, rather than only vested as currently drafted:

Amend 3.7.1.11 b) as follows:

~~b) Where strategic infrastructure is developed on land not held by Council, easements in gross in favour of Hamilton City Council will be required to secure access to any public infrastructure. It is Council's expectation that all Ruakura Strategic Infrastructure will be vested in or acquired by the Council.~~

Connections to Ruakura Strategic Infrastructure

163. Mr Mitchelmore considers that 3.7.1.12c is factually incorrect where it specifies that there is no interim wastewater capacity within the City's existing wastewater network to accommodate growth in the Ruakura Structure Plan area. He notes that there is existing capacity to receive wastewater into the City network at the Crosby Road-Wairere Drive roundabout. The issue is that a gravity sewer needs to be connected to the existing interceptor sewer. I have adopted Mr Mitchelmore's revised wording below:

Amend 3.7.1.12 c as follows:

~~c) There is no interim wastewater capacity within the City's existing wastewater network to accommodate growth in the Ruakura Structure Plan area. All wastewater is to be disposed via a wastewater service which will be extended south along the Spine Road corridor through Land Development Plan applications. All Land Development Plan~~

~~applications shall demonstrate how they provide for immediate and or future connections to the Ruakura Strategic Infrastructure. Other than for any wastewater disposal solutions specifically agreed to by the Council on a case by case basis all development in the Ruakura Structure Plan Area must connect either directly or indirectly to the City's existing wastewater network in the vicinity of the Crosby Road-Wairere Drive roundabout.~~

Noise

164. Mr Styles explains the impact of measuring noise from the site boundary as opposed to zone boundary in his evidence. A site boundary is defined both by survey and typically on the ground by fencing etc., as opposed to zone boundaries which are only defined on planning maps. It therefore forms a more accurate basis for measurement. I have adopted Mr Styles' recommended change to rule 25.8.3.13a) accordingly below. I understand that the notional boundary change proposed in the evidence of Mr Styles (and sought in the TGH submission), has already been attended to in the s42A version of the provisions.

(The changes I propose to the tracked variation provisions are shown as highlighted underlines and ~~strikeouts~~):

Amend rule 25.8.3.13 (a) as follows:

~~a) Activities shall not exceed the following noise limits within the boundary of any other site in the:~~

i) At or within the ~~Notional~~ notional boundary of any residential unit on any other site within the Ruakura Logistics Zone or within the Ryburn Road and Percival Road Large Lot Residential Zone (as identified in Appendix 14-1).

ii. At or within the boundary of any site in the Residential Zones ~~or~~ and Knowledge Zone, ~~University Precinct (D)~~ except as provided for in I above.

...

Conclusions

165. Based on my own assessment and relying on the expert assessments and evidence of others where noted, I consider that subject to the changes identified in my evidence, the variation satisfies the RMA statutory framework.
166. Specifically, it includes appropriate objectives, policies, rules and other methods that accord with and will assist the Hamilton City Council to carry out its functions as set out in section 31 of the RMA, so as to achieve the purpose of the RMA, as set out in section 5.
167. The variation also gives effect to relevant national policy statements and the Operative Regional Policy Statement, through appropriate provisions.
168. The variation also has proper regard to the Waikato Regional Policy Statement (which directs at Ruakura the form of growth and development enabled by the variation) and also takes into account the Waikato-Tainui Environmental Plan, being a relevant planning document recognised by an iwi authority, as required by section 74(2A) of the RMA.
169. With the amendments I have recommended in my evidence I consider that the variation will achieve the purpose of the Act.

Peter Hall

15 July 2016