



FONTERRA LIMITED

PROPOSED PLAN CHANGE 2 (TE AWA LAKES) TO THE HAMILTON CITY DISTRICT PLAN FURTHER SUBMISSIONS

To: Economic Growth and Planning Unit
Hamilton City Council
Private Bag 3010
HAMILTON 3240

Via Email: districtplan@hcc.govt.nz

SUBMITTER: FONTERRA LIMITED

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Fonterra wishes to be heard in support of this submission.

I confirm that I am authorised on behalf of Fonterra Limited to make this submission.

1. Fonterra Limited (Fonterra) is a person who has an interest in the proposal that is greater than the interest of the general public. Fonterra has significant assets and operational interests within the Te Rapa North locality that may be affected by the plan change, including the Te Rapa Dairy

Factory and adjacent industrial zoned land. The locality is defined as a Strategic Industrial Node and the Factory falls within the definition of Regionally Significant Industry within the Waikato Regional Policy Statement.

2. Fonterra made submissions on Plan Change 2, listed as Submission 46. The attached schedule sets out Fonterra's further submissions in respect of submission points made by other parties.
3. Fonterra wishes to be heard in support of its submission points and would be prepared to consider presenting a joint case with submitters raising similar concerns.
4. I can confirm that copies of this further submission have been served on the person making the original submission.

Dated: 2 February 2018

A handwritten signature in blue ink that reads "Brigid Buckley". The signature is written in a cursive style and is placed on a light-colored rectangular background.

BRIGID BUCKLEY

National Policy Manager – Global Sustainability and Resources
Fonterra Limited

Further Submission Points on Proposed Plan Change 2 to the Hamilton City District Plan

2 February 2018

REF	SUBMITTER	SECTION	RELIEF SOUGHT	SUPPORT / OPPOSE	REASONS	DECISION SOUGHT
17.00	Waikato District Council	Strategic	Requests evidence on whether there is an over or under supply of industrial land, the effect on the Te Rapa North and Horotiu Industrial Nodes, precedent effects and if this is the best place for residential development.	Support	For the reasons outlined in Fonterra's original submission.	Allow the submission
17.01	Waikato District Council	General	Seeks provisions to address reverse sensitivity, visual amenity, traffic and noise effects on neighbours.	Support in part	For the reasons outlined in Fonterra's original submission, Fonterra is concerned to ensure that issues relating to reverse sensitivity, traffic and noise effects are appropriately addressed.	Allow the submission
17.02	Waikato District Council	General	Seeks clarification on stormwater and meeting the vision and strategy objectives about discharges to Waikato River.	Support	Fonterra is responsible for ensuring compliance with its own discharge consents to the Waikato River, which could be affected by discharges from the plan change area within the mixing zone downstream of the Factory.	Allow the submission
17.03	Waikato District Council	General	Requests evidence that the cost of remediating the site for industrial use is uneconomic.	Support	For the reasons outlined in Fonterra's original submission.	Allow the submission

REF	SUBMITTER	SECTION	RELIEF SOUGHT	SUPPORT / OPPOSE	REASONS	DECISION SOUGHT
19.01	Open Country Dairy	General	Reject the plan change in its totality	Support	For the reasons outlined in Fonterra's original submission.	Allow the submission
23.01	Future Proof Implementation Committee	Strategic	Provide evidence that it is not economic to develop the site for industrial purposes.	Support	For the reasons outlined in Fonterra's original submission. In addition, Fonterra considers that such evidence should also consider the additional economic costs that may be arise in respect of the continued operation and expansion of industrial activities elsewhere within the Te Rapa North Strategic Industrial Node.	Allow the submission
23.02	Future Proof Implementation Committee	Strategic	Provide evidence to understand the loss of strategic industrial land and impacts on other industrial nodes	Support	For the reasons outlined in Fonterra's original submission. In addition, Fonterra considers that such evidence should also consider the impacts on the balance of the Te Rapa Strategic Industrial Node.	Allow the submission
31.00	AFFCO New Zealand Ltd	General	Reject the plan change in its entirety.	Support	For the reasons outlined in Fonterra's original submission.	Allow the submission

REF	SUBMITTER	SECTION	RELIEF SOUGHT	SUPPORT / OPPOSE	REASONS	DECISION SOUGHT
37.02	SC & AJ Hodgkinson	Strategic	Retain existing zoning due to isolated pocket of residential land with lack of infrastructure including capacity in local schools, water, electricity and broadband.	Support	For the reasons outlined in Fonterra's original submission, Fonterra considers that the establishment of an isolated enclave of residential land adjoining strategically important heavy industry is inappropriate and unsustainable.	Allow the submission
41.00	Waikato Regional Council	Strategic	Seeks robust and comprehensive evidence on whether the plan change gives effect to the policies in the RPS, particularly those in Section 6 Built Environment (RPS 6.1, 6.3, 6C, 6D and 6.16). These provisions promote a compact urban form which can accommodate the Future Proof area's growth and establish a settlement pattern that provides certainty about timely and efficient provision of infrastructure.	Support	For the reasons outlined in Fonterra's original submission. In addition, Fonterra considers that such evidence should also address the matters in Policy 4.4 of the RPS which provides specifically for the continued operation and expansion of regionally significant industry.	Allow the submission

REF	SUBMITTER	SECTION	RELIEF SOUGHT	SUPPORT / OPPOSE	REASONS	DECISION SOUGHT
41.01	Waikato Regional Council	Strategic	Reject the plan change unless there is economic evidence to address the loss of industrial land, the current demand for residential and industrial land, the wider implications of residential activities, comparative costs and benefits given geotechnical constraints; and the impact of commercial aspects on other commercial centres.	Support	For the reasons outlined in Fonterra's original submission. In addition, Fonterra considers that such evidence should also address the effects on the continued operation and expansion of the existing Te Rapa Dairy Factory, and the effects on the potential future development of industrial activities within the balance of the Te Rapa Strategic Industrial Node.	Allow the submission
41.02	Waikato Regional Council	Strategic	Oppose the plan change as it proposes an alteration to the agreed land use pattern in a strategic industrial node. This challenges the agreed Future Proof land use pattern and provides uncertainty about the efficient and effective provision of infrastructure. If approved it could set a precedent for further challenges to the sub-region's agreed strategic direction.	Support	For the reasons outlined in Fonterra's original submission. In addition, Fonterra also considers that the proposal has inadequately assessed the potential effects on the Te Rapa Dairy Factory as regionally significant industry and establishes an unacceptable precedent in terms of the approach that is adopted towards the protection of such activities.	Allow the submission
41.03	Waikato Regional Council	Strategic	Requires evidence that includes information from the NPS-UDC.	Support	For the reasons outlined in Fonterra's original submission.	Allow the submission

REF	SUBMITTER	SECTION	RELIEF SOUGHT	SUPPORT / OPPOSE	REASONS	DECISION SOUGHT
41.04	Waikato Regional Council	General	Include provisions to address reverse sensitivity.	Support	For the reasons outlined in Fonterra's original submission.	Allow the submission
41.05	Waikato Regional Council	Strategic	Reject unless information can be provided to demonstrate that the plan change gives effect to Policy 6.3 of the RPS as the residential component could result in the Waikato Expressway investment not being realised.	Support	For the reasons outlined in Fonterra's original submission. In addition, Fonterra considers that such information should also demonstrate how the proposal gives effect to Policy 4.4 of the RPS as the development could compromise the continued operation and expansion of regionally significant industry.	Allow the submission
41.06	Waikato Regional Council	Strategic	Reject due to limited opportunities to utilise pedestrian/cycle connections to more established parts of city.	Support	For the reasons outlined in Fonterra's original submission.	Allow the submission
41.07	Waikato Regional Council	General	Reject due to difficulty in providing passenger transport facilities and multi modal transport network. Development should be compact to minimise need for motor vehicles.	Support	For the reasons outlined in Fonterra's original submission.	Allow the submission
45.00	New Zealand Transport Agency	Strategic	Reject the plan change as it is counter to the principles and objectives of the RPS, Future Proof Growth Strategy, Hamilton Urban Growth Strategy and proposed Access Hamilton Strategy, in relation to the strategic integration of land use planning and infrastructure investment.	Support	For the reasons outlined in Fonterra's original submission.	Allow the submission

REF	SUBMITTER	SECTION	RELIEF SOUGHT	SUPPORT / OPPOSE	REASONS	DECISION SOUGHT
47.01	Hamilton City Council	Strategic	Seeks to ensure a strategic industrial node is not lost to, or compromised by, residential development, unless consistent with the NPS-UDC and an amended Regional Policy Statement.	Support	For the reasons outlined in Fonterra's original submission. Fonterra agrees that the proposal is premature in advance of clear supporting evidence provided through the assessments required under the NPS-UDC and an amended RPS framework which also ensures that an amended settlement pattern will not compromise the continued operation and expansion of regionally significant industry.	Allow the submission

REF	SUBMITTER	SECTION	RELIEF SOUGHT	SUPPORT / OPPOSE	REASONS	DECISION SOUGHT
47.02	Hamilton City Council	Strategic	Seeks evidence that there is a need for additional residential zoned land within the City.	Support	Fonterra agrees that it is essential that there is a clear analysis of the available residential land supply, noting that the NPS-UDC requires assessments of development capacity to relate to housing markets which may extend across local authority administrative boundaries. In this context, evidence of need should consider potential opportunities within land adjoining the City that has been previously identified as intended for residential expansion.	Allow the submission
47.03	Hamilton City Council	Strategic	Add provisions to ensure the developer provides the full cost of the infrastructure needed to service the development.	Support	For the reasons outlined in Fonterra's original submission, it is important to ensure that the needs of the development are provided for and that the costs of improvements do not fall on future development within the Te Rapa North Strategic Industrial Node.	Allow the submission

REF	SUBMITTER	SECTION	RELIEF SOUGHT	SUPPORT / OPPOSE	REASONS	DECISION SOUGHT
47.60	Hamilton City Council	3.8.3 Proposed Movement Network	Amend 3.8.3 to recognise need for urban standard shared use path, appropriate facilities for passenger transport and upgrading of Kapuni/Te Rapa Road and Ruffell Road/Te Rapa Road intersections.	Support	For the reasons outlined in Fonterra's original submission, it is important to ensure that the needs of the development are provided for and that the costs of improvements do not fall on future development within the Te Rapa North Strategic Industrial Node.	Allow the submission
47.61	Hamilton City Council	3.8.3 Proposed Movement Network	Resolve traffic safety concerns at Hutchinson Road/ Te Rapa Road roundabout.	Support	For the reasons outlined in Fonterra's original submission it is important to ensure that the needs of the development are provided for and that the costs of improvements do not fall on future development within the Te Rapa North Strategic Industrial Node.	Allow the submission
47.62	Hamilton City Council	3.8.3 Proposed Movement Network	Amend 3.8.3 to delete the trigger for road upgrades and replace with improvements when required.	Support	For the reasons outlined in Fonterra's original submission, it is important to ensure that the needs of the development are provided for and that the costs of improvements do not fall on future development within the Te Rapa North Strategic Industrial Node.	Allow the submission

REF	SUBMITTER	SECTION	RELIEF SOUGHT	SUPPORT / OPPOSE	REASONS	DECISION SOUGHT
47.63	Hamilton City Council	3.9 Rules	Amend to provide consistency with numbering and require the addition of staging rules for the development of the structure plan and transportation infrastructure improvements	Support	For the reasons outlined in Fonterra's original submission.	Allow the submission
47.65	Hamilton City Council	General	Update of traffic modelling to ensure most up to date information is used.	Support	For the reasons outlined in Fonterra's original submission.	Allow the submission
51.00	Contact Energy	General	Decline the plan change.	Support	For the reasons outlined in Fonterra's original submission.	Allow the submission
52.00	Ports of Auckland	General	Decline the plan change.	Support	For the reasons outlined in Fonterra's original submission.	Allow the submission

Further submission ends.