

**IN THE ENVIRONMENT COURT  
AT AUCKLAND**

**ENV-2024-AKL-**

**I TE KŌTI TAIAO O AOTEAROA  
TĀMAKI MAKAURAU ROHE**

**IN THE MATTER** of the Resource Management Act 1991  
(the “RMA”)

**AND**

**IN THE MATTER** of an appeal under Clause 14(1) of the  
First Schedule of the RMA against the  
decision of the Waikato Regional Council  
on the Proposed Change 1 to the  
Waikato Regional Policy Statement

**BETWEEN**

**TITANIUM PARK LIMITED AND  
RUKUHIA PROPERTIES LIMITED**

**Appellants**

**AND**

**WAIKATO REGIONAL COUNCIL**

**Respondent**

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**NOTICE OF APPEAL BY TITANIUM PARK LIMITED AND RUKUHIA PROPERTIES  
LIMITED AGAINST THE DECISION ON PROPOSED CHANGE 1 TO THE WAIKATO  
REGIONAL POLICY STATEMENT**

**22 December 2023**

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## **1 INTRODUCTION**

- 1.1 Titanium Park Limited (“TPL”) and Rukuhia Properties Limited (“RPL”) appeal against parts of the decision (“Decision”) by Waikato Regional Council (“WRC”) on Proposed Change 1 to the Waikato Regional Policy Statement (“PC1”).
- 1.2 TPL and RPL made a joint submission and joint further submission on PC1.
- 1.3 TPL and RPL are not trade competitors for the purposes of section 308D of the RMA.
- 1.4 TPL and RPL received notice of the Decision on 15 November 2023.
- 1.5 The Decision subject to appeal was made by WRC.
- 1.6 TPL and RPL are appealing those parts of the Decision identified in **Table One** below.

## **2 GENERAL REASONS FOR THE APPEAL**

- 2.1 TPL is a wholly owned subsidiary of Waikato Regional Airport Limited which operates Hamilton Airport. TPL has delivered Titanium Park – a master planned business park adjacent to Hamilton Airport. RPL owns a 29ha site located between State Highway 3 and Middle Road.<sup>1</sup>
- 2.2 TPL/RPL are the joint applicants for Plan Change 20 to the Waipā District Plan (“PC20”). PC20 proposes changes to the Waipā District Plan to expand Titanium Park, including:
  - (i) extending the Northern Precinct of the Airport Business Zone by approximately 89ha; and
  - (ii) establishing the planning framework for 130ha of the Northern Precinct for business activities.<sup>2</sup>
- 2.3 PC20 was approved by Waipā District Council in June 2023. The decision is currently subject to an Environment Court appeal by the Royal Forest and Bird Protection Society of New Zealand Incorporated.

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<sup>1</sup> 3463 Ohaupo Road.

<sup>2</sup> Approximately 41ha of the Northern Precinct is already zoned Airport Business Zone.

2.4 By way of joint submission on PC1, TPL/RPL supported the identification of Hamilton Airport and the surrounding Airport Business Zone as a Strategic Industrial Node and Urban Enablement Area. However, TPL/RPL sought that the Urban Enablement Area extend to the full 130ha extent of the land covered by PC20 (identifying that land for short-medium term development); plus provide for an additional long-term expansion to the Northern Precinct. TPL/RPL also submitted on concerns with the application of wāhi toitū and wāhi toiora areas.

2.5 The Decision responded to/accounted for some of the matters raised in TPL and RPL's submission and further submission on PC1. However, to the extent the Decision does not provide for the relief sought in this Notice of Appeal, TPL and RPL consider that the Decision:

- (a) Does not promote the sustainable management of resources, and does not achieve Part 2 and other provisions of the RMA;
- (b) Does not represent the efficient use and development of natural and physical resources;
- (c) Does not manage natural and physical resources in a manner that enables the community to provide for its social and economic wellbeing;
- (d) Does not represent sound resource management practice or integrated management.
- (e) Will not meet the reasonably foreseeable needs of future generations;
- (f) Does not represent the most appropriate means of exercising WRC's functions and is therefore not appropriate under s32 and other provisions of the RMA;
- (g) Does not give effect to the National Policy Statement on Urban Development ("NPS-UD").

2.6 Without derogating from the generality of the above, TPL and RPL appeal the following specific parts of the Decision on the grounds set out below and in **Table One**.

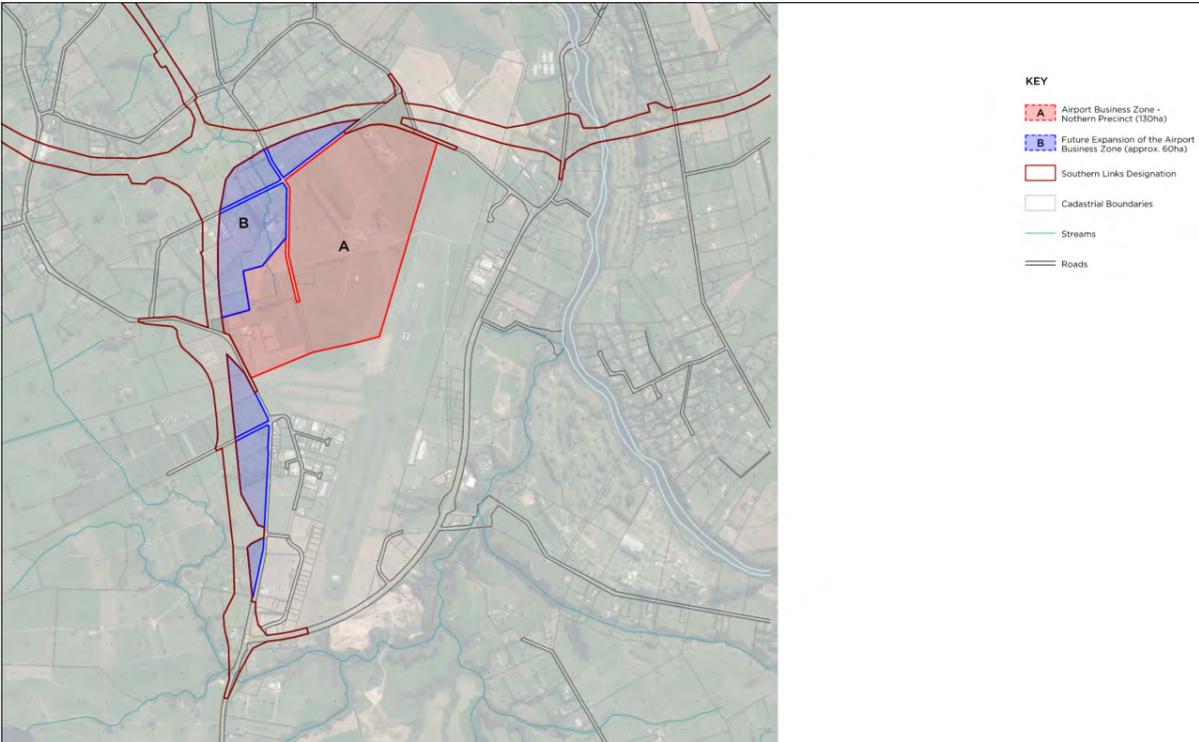
### **3 DETAILED REASONS AND RELIEF SOUGHT**

3.1 **Table One** sets out the relief sought by TPL and RPL and provides more specific reasons for the appeal.

3.2 TPL and RPL seek the relief described in **Table One**, and/or such consequential/related relief as may be necessary or appropriate to give effect to their concerns.

**TABLE ONE: RELIEF SOUGHT AND REASONS**

Appeal point reference	Proposed Provision reference	Explanation and reasons	Relief sought																				
<b>Timing and staging of development</b>																							
1	<p><b>APP12 – Future Proof tables</b></p>	<p>PC1 identified Hamilton Airport and the surrounding Airport Business Zone as a Strategic Industrial Node and Urban Enablement Area. TPL/RPL supported that identification. However, the Decision limits the Strategic Industrial Node and Urban Enablement Area to the extent of the Airport Business Zone under the operative Waipā District Plan. In so doing, the Decision fails to align with the Northern Precinct extent that is anticipated under PC20 (and approved by Waipā District Council in its PC20 decision) or to provide appropriate strategic direction for the logical longer-term expansion of the Northern Precinct beyond 2031.</p> <p>TPL/RPL say that the Strategic Industrial Node and Urban Enablement Area should extend to include:</p> <ul style="list-style-type: none"> <li>a) the full extent of the Northern Precinct proposed in PC20; and</li> <li>b) an additional Northern Precinct Expansion Area;</li> </ul> <p>so that APP12 includes both the blue and red shaded area in <b>Figure 1</b> (shown below) – identifying the blue area for short-medium term development and the red area as long-term development.</p> <p>In failing to provide for the full extent of PC20 and longer-term strategic direction for the expansion of the Northern Precinct beyond 2031 as sought by TPL/RPL, the Decision fails to provide sufficient business land capacity and accordingly fails to give effect to the NPS-UD. TPL/RPL further say the Decision is contrary to s61 of the RMA and sound resource management practice.</p> <p>The relief sought by TPL/RPL is appropriate for several reasons:</p> <ul style="list-style-type: none"> <li>a) It will provide additional business land that is plan-enabled and capable of being infrastructure ready in the short term.</li> <li>b) It will also provide additional business land that will be plan-enabled and infrastructure ready in the medium term. This is achieved by including the balance (approximately 90ha) of Northern Precinct proposed under PC20.</li> </ul>	<p>TPL and RPL seek APP12 be amended so that it is consistent with PC20 (short-term) and includes the Northern Precinct Expansion Area (long-term) by Amend the industrial land allocation and staging, as follows:</p> <p>(1) Amending the industrial land allocation and staging, as follows:</p> <table border="1" data-bbox="1671 759 2163 1249"> <thead> <tr> <th data-bbox="1671 759 1854 975">Strategic Industrial Nodes (based on gross developable area)</th> <th colspan="2" data-bbox="1854 759 2022 975">Industrial Land allocation and staging (ha)</th> <th data-bbox="2022 759 2163 975">Total allocation to 2050 (ha)</th> </tr> <tr> <td></td> <th data-bbox="1854 975 1939 1062">2020-2030</th> <th data-bbox="1939 975 2022 1062">2031-2050</th> <td></td> </tr> </thead> <tbody> <tr> <td data-bbox="1671 1062 1854 1094">...</td> <td></td> <td></td> <td></td> </tr> <tr> <td data-bbox="1671 1094 1854 1214">Hamilton Airport/Southern Links</td> <td data-bbox="1854 1094 1939 1214">94 <u>130</u></td> <td data-bbox="1939 1094 2022 1214">46 <u>60</u></td> <td data-bbox="2022 1094 2163 1214">140 <u>190</u></td> </tr> <tr> <td data-bbox="1671 1214 1854 1246">...</td> <td></td> <td></td> <td></td> </tr> </tbody> </table> <p>(2) TPL/RPL further seek the amendment to the APP12 explanation as follows:</p> <p><b><i>Hamilton Airport/Southern Links</i></b></p>	Strategic Industrial Nodes (based on gross developable area)	Industrial Land allocation and staging (ha)		Total allocation to 2050 (ha)		2020-2030	2031-2050		...				Hamilton Airport/Southern Links	94 <u>130</u>	46 <u>60</u>	140 <u>190</u>	...			
Strategic Industrial Nodes (based on gross developable area)	Industrial Land allocation and staging (ha)		Total allocation to 2050 (ha)																				
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...																							

Appeal point reference	Proposed Provision reference	Explanation and reasons	Relief sought
		<p>c) The Structure Planning that has been prepared for PC20 also contemplates the longer term Northern Precinct Expansion Area to ensure that a well-functioning urban environment can be achieved.</p> <p>d) Including the full extent of the PC20 Northern Precinct as Strategic Industrial Node and Urban Enablement Area improves the ability to strategically plan for and develop the full extent of the Northern Precinct in an integrated and comprehensive way. It also provides a balanced settlement pattern for the growth that is planned between Hamilton and the Hamilton Airport/Southern Links, providing a clear direction for establishing new residential areas that are near future business land / employment opportunities. This will improve the ability to strategically plan the growth of the Hamilton Airport / Southern Links area over the 2031-2050 period.</p>  <p><b>KEY</b></p> <ul style="list-style-type: none"> <li><span style="color: red;">■</span> A Airport Business Zone - Northern Precinct (130ha)</li> <li><span style="color: blue;">■</span> B Future Expansion of the Airport Business Zone (approx. 60ha)</li> <li><span style="color: red;">▭</span> Southern Links Designation</li> <li><span style="border: 1px solid black;">▭</span> Cadastrial Boundaries</li> <li><span style="color: blue;">—</span> Streams</li> <li><span style="color: grey;">—</span> Roads</li> </ul>	<p><i>The land identified in Table 35 for the Airport /Southern Links is based on the amount of land currently provided growth direction that is set out within for in the Waipā District Plan and the Waipā growth strategy, Waipā 2050 as well as an additional 60 ha beyond this.</i></p> <p><i>The Airport Urban Enablement Area includes 130ha within the Northern Precinct as shown in the Waipā District Plan that is plan-enabled and infrastructure ready in the short term. A further 60ha is provided as the Northern Precinct expansion area between the Northern Precinct (to the east) and the Southern Links designation (to the west) that provides longer term supply.</i></p> <p><i>The node is currently affected by infrastructure constraints, particularly in the surrounding transport network. The Southern Links project will address some of the transport capacity issues but is currently a long term solution. Infrastructure solutions which are consistent with, and work towards a long term infrastructure pattern will be required to enable development in advance of the construction of Southern Links</i></p>
<p><b>Figure 1: Northern Precinct under PC20 and the Northern Precinct Expansion Area.</b></p>			

Appeal point reference	Proposed Provision reference	Explanation and reasons	Relief sought
2	Map 43 – Future proof indicative urban and village enabled areas	<p>For the reasons set out above, TPL/RPL seek Map 43 be amended so that it is consistent with PC20. This requires the location and spatial extent of the Strategic Industrial Node and Urban Enablement Areas that are shown on Map 43 to reflect the short-term development capacity enabled by PC20 and the long-term development capacity enabled by the Northern Precinct Expansion Area.</p>	<p>TPL/RPL seek the amendment of Map 43 so that it is consistent with the amended Map 43 set out in <b>Annexure A</b> to this Notice of Appeal.</p> <p>The amended Map 43 sought by TPL/RPL:</p> <ul style="list-style-type: none"> <li>a) Includes all of the Northern Precinct and Northern Precinct Expansion Area within the extent of the 'Urban Enablement Area';</li> <li>b) Includes the PC20 extent of the Northern Precinct (130ha) as 'Short – Medium term development: 2020-2030'; and</li> <li>c) Identifies the Northern Precinct Expansion Area (60ha) as a 'Long-term development: 2031-2050' area;</li> <li>d) Retains the identification of the Airport as a 'Strategic Industrial Node'; and</li> <li>e) Retains the identification of the Southern Links designation.</li> </ul>
3	Map 44 – Future Proof wāhi toitū and wāhi toiora areas	<p>TPL/RPL seek that Map 44 also be amended so that it is consistent with the location and spatial extent of the Urban Enablement Areas that are shown on amended Map 43 set out in <b>Annexure A</b>.</p> <p>The relief sought by TPL/RPL is appropriate and consistent with Part 2 of the RMA and the NPS-UD in the context of the introduction of wāhi toitū and wāhi toiora areas by PC1 (the former of which requires development 'avoid or mitigate' adverse effects in respect of relevant values within these areas (Criteria A(O) of APP13)).</p>	<p>Amend Map 44 so that all of the PC20 Northern Precinct and Northern Precinct Expansion Area are within the extent of the 'Urban Enablement Area'.</p>

Appeal point reference	Proposed Provision reference	Explanation and reasons	Relief sought
4	<b>APP13 - Responsive Planning Criteria – Out-of-sequence and Unanticipated Developments (Future Proof local authorities)</b>	<p>TPL and RPL submitted that the criteria related to wāhi toitū and wāhi toiora in Clauses P and Q be amended so that:</p> <ul style="list-style-type: none"> <li>• they do not apply to development proposals inside Urban Enablement Areas;</li> <li>• proposals for urban development must consider the values that make the area wāhi toitū and wāhi toiora and demonstrate that associated effects can be avoided, remedied or mitigated;</li> </ul> <p>TPL/RPL also sought in their submission that Map 44 be amended to remove wāhi toitū and wāhi toiora from Urban Enablement Areas in the same way that they are not shown within Urban Areas.</p> <p>The Decision addressed in part the TPL and RPL submissions, however Clause P still does not exclude development needed to cater for long term growth. That is inconsistent with and does not give effect to the NPS-UD. Further, the Decision does not demonstrate sufficient analysis to justify the absence of recognition for long-term growth areas in this context.</p> <p>Clause P limits consideration of urban development on areas identified as wāhi toitū to limited circumstances (during a review of the Future Proof Strategy, development of a Future Development Strategy, or a comprehensive district plan review). Clause P excludes from its listed mechanisms council-initiated plan changes, private plan change requests, and resource consent applications. This is inappropriately narrow and contrary to s32 and Part 2 of the RMA.</p> <p>Inclusion of the wording “strong precautionary approach” and a “precautionary approach” such that if the land is not needed in the short-medium term it should not be considered for urban development in Clauses P and Q is unnecessary, inappropriate and not reasonable.</p>	<p>Amend Clauses P and Q so that they do not apply to Urban Enablement Areas (including those needed in the short, medium and long term); <b>OR</b></p> <p>amend Clauses P and Q to read:</p> <p><i>“P. During a review of the Future Proof Strategy (including the development of a Future Development Strategy under the National Policy Statement on Urban Development 2020 and its subsequent 3-yearly review), or a comprehensive district plan review, or council-initiated plan change or private plan change, or resource consent application, consideration may be given to urban development on areas identified as wāhi toitū. A strong precautionary approach will be taken such that if the land is not needed to fill an identified shortfall of development capacity in the short-medium term, it should not be considered for urban development. Preference will be given to urban development proposals which are not located on areas identified as wāhi toitū. Relevant considerations include Criteria O and the need to fill an identified shortfall of development capacity over the short-medium and long term.”</i></p> <p><i>Q That a precautionary approach be taken when considering development on areas identified as wāhi toiora, such that if the land is not needed in the short-medium term it should not be considered for urban development.</i></p>

## 4 ANNEXURES

4.1 The following documents are attached to this notice:

- (a) Amended Map 43 (as sought by TPL/RPL);
- (b) A copy of TPL and RPL's submission;
- (c) A copy of TPL and RPL's further submission;
- (d) A list of names and addresses of persons to be served with a copy of this notice of appeal.

4.2 [Here](#) is a link to the Decision.

**TITANIUM PARK LIMITED AND RUKUHIA  
PROPERTIES LIMITED** by their solicitors,  
ChanceryGreen:



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JR Welsh  
22 December 2023

**Address for service:** ChanceryGreen  
C/- Jason Welsh  
PO Box 47516, Ponsonby  
Auckland 1144  
(09) 357 0600  
jason.welsh@chancerygreen.com

**To:** The Registrar at the Environment Court in Auckland

**And to:** Waikato Regional Council

**And to:** Submitters on Proposed Change 1

## **Advice to recipients of copy of notice of appeal**

### *How to become party to proceedings*

You may be a party to the appeal if you made a submission or a further submission on the matter of this appeal.

To become a party to the appeal, you must -

- within 15 working days after the period for lodging a notice of appeal ends, lodge a notice of your wish to be a party to the proceedings (in form 33) with the Environment Court and serve copies of your notice on the relevant local authority and the appellant; and
- within 20 working days after the period for lodging a notice of appeal ends, serve copies of your notice on all other parties.

Your right to be a party to the proceedings in the court may be limited by the trade competition provisions in section 274(1) and Part 11A of the Resource Management Act 1991.

You may apply to the Environment Court under section 281 of the Resource Management Act 1991 for a waiver of the above timing or service requirements (see form 38).

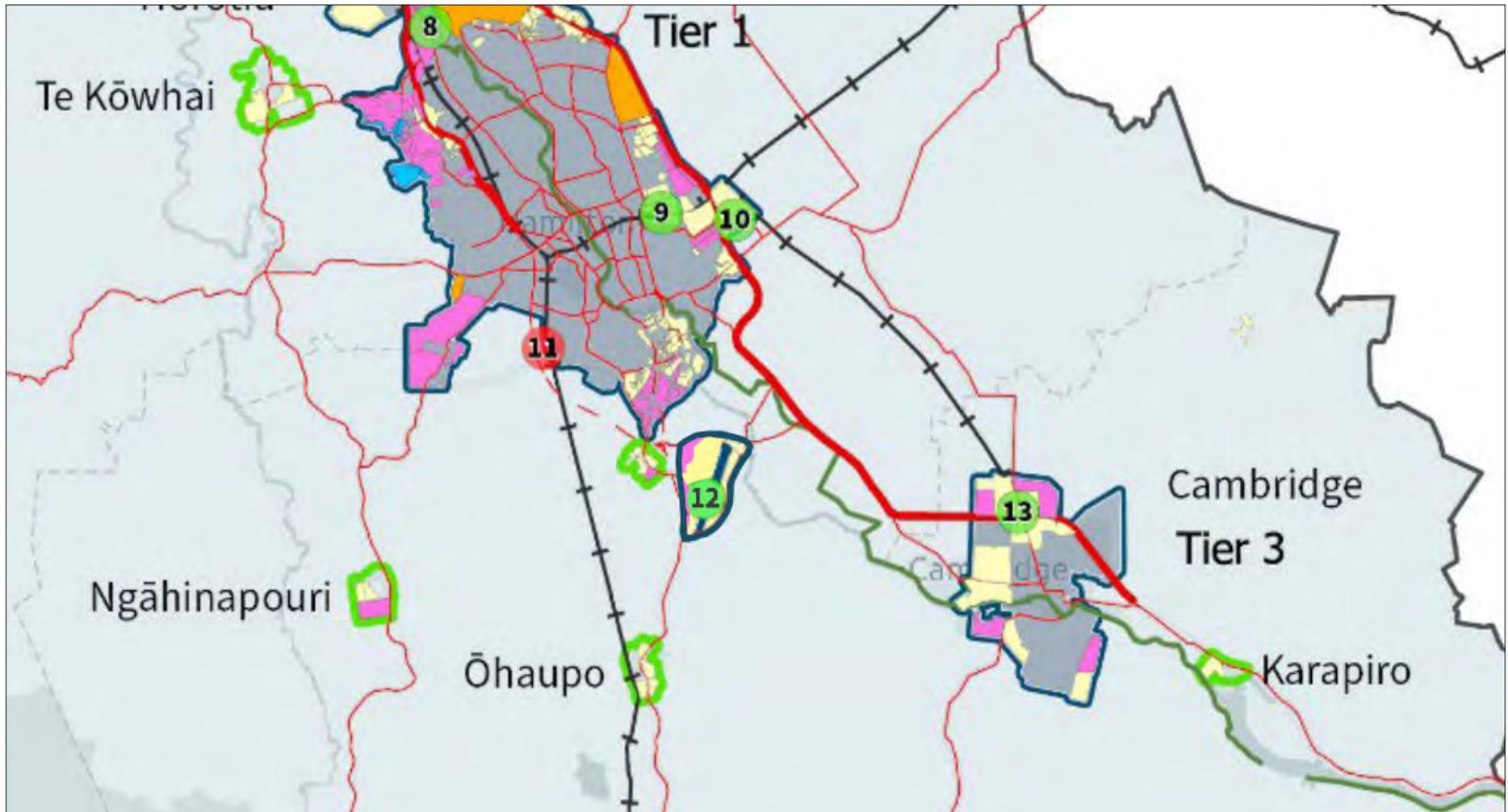
### *How to obtain copies of documents relating to appeal*

The copy of this notice served on you does not attach a copy of the appellant's submission/further submission or the decision appealed. These documents may be obtained, on request, from the appellant.

### *Advice*

If you have any questions about this notice, contact the Environment Court in Auckland.

ANNEXURE A



Amendment sought to Map 43: Future Proof indicative urban and village enablement areas (indicated within Area 12)

## ANNEXURE B

## Submission

# ON A PUBLICLY NOTIFIED PROPOSED POLICY STATEMENT OR PLAN



Under Clause 6 of the First Schedule to the Resource Management Act 1991

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**TO** Waikato Regional Council  
**SUBMISSION ON** Waikato Regional Policy Statement Proposed Change 1 – National Policy Statement on Urban Development 2020 and Future Proof Strategy update ('PC1')  
**NAME OF SUBMITTER** Titanium Park Limited ('TPL') and Rukuhia Properties Limited ('RPL')

Neither TPL nor RPL could gain an advantage in trade competition through this submission.

### SUBMISSION IN SUPPORT SUBJECT TO THE FOLLOWING

#### 1.0 SCOPE OF THE SUBMISSION

This submission will:

- a) Provide background on TPL and RPL
- b) Provide an overview of the Northern Precinct.
- c) Set out the parts of PC1 that both TPL and RPL support and are seeking to be retained
- d) Set out the parts of PC1 that both TPL and RPL oppose, including the relief that they are seeking instead.

#### 2.0 BACKGROUND

Waikato Regional Airport Ltd (WRAL) is the owner and certified operator of Hamilton Airport. The Airport and its surrounding land are a key regional transport hub. It is also an economic growth driver located on the southern corner of the golden triangle that connects Auckland, Hamilton and Tauranga.

WRAL is wholly owned by five territorial authorities; Hamilton City Council, Waikato District Council, Matamata-Piako District Council, Waipa District Council and Otorohanga District Council. To undertake its airport operations, WRAL owns approximately 170ha of aeronautical land between State Highway 21 (SH21) near the southern end of the existing runway, extending north to Raynes Road towards the northern end of the runway.

The Airport is defined as Regionally Significant Infrastructure' under the Regional Policy Statement (RPS) and correspondingly it is afforded a high degree of recognition in the RPS.

WRAL have established Titanium Park Limited (TPL) to manage and develop the Airport Business zone that encase the Airport. The Airport Business zone is separated into several Precincts, with only the Northern Precinct left to be developed.

## The Northern Precinct

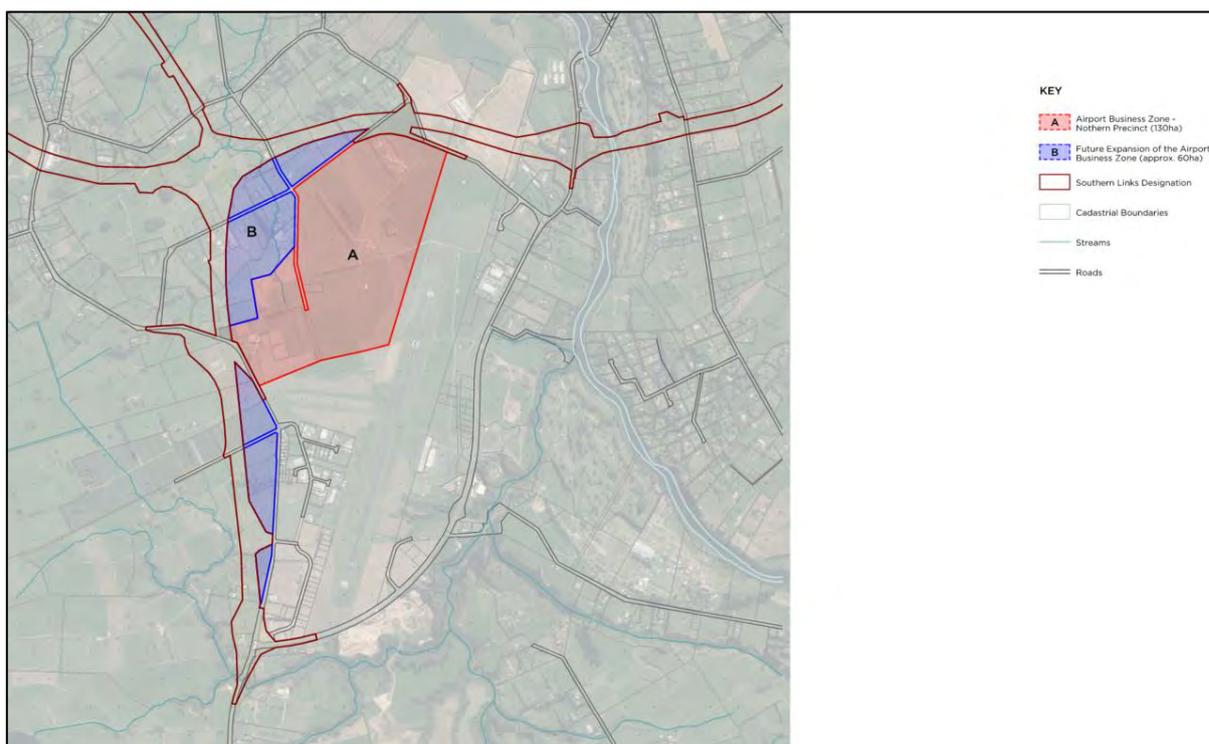
The Northern Precinct borders the Airport's main runway to the east, the secondary grass runway to the south, Ohaupo (SH3) and Narrows Road to the west and Raynes Road (SH21) to the north.

In the context of this submission, there are three elements of the Northern Precinct;

1. The current extent of the Northern Precinct under the Waipa District Plan. This comprises of 40ha of Airport Business zoned land (as identified in Figure 2 below) that is wholly owned by TPL.
2. The proposed extent of the Northern Precinct under Private Plan Change 20 (PPC20) to the Waipa District Plan. PPC20 is proposing to increase the size of the Northern Precinct to 130ha along with other changes to the Structure Plan and plan provisions. The extent of the Northern Precinct proposed under PPC20 is shown by the red shaded area in **Figure 1**. TPL and Rukuhia Properties Limited ('RPL') are the majority landowners of this area.
3. The Northern Precinct Expansion Area is long term future growth area that comprises the remaining rural zoned land between the Northern Precinct proposed under PPC20 and the Southern Links designation. The extent of this area is denoted by the blue shading in **Figure 1**. Both TPL and RPL own land in this area along with several other landowners.

TPL and RPL have already commissioned the development of a Masterplan, Structure Plan and all the necessary supporting reports to form an evidence base that will be used to inform the future development of the extent of the Northern Precinct proposed under PPC20.

PPC20 was lodged with Waipa District Council earlier this year and was notified in September 2022. Submissions and further submissions have now closed, and a hearing has been set for March 2023. Further details of PPC20 can be found at <https://www.waipadc.govt.nz/our-council/waipadistrict-plan/wpdc-variations/current-plan-changes/proposed-plan-change-20-airport-northern-precinct-extension>.



**FIGURE 1:** The extent of Northern Precinct shown in red, with the future growth area for Northern Precinct shown in blue.

We note that a 'future extension direction' beyond the extent of the Northern Precinct proposed under PPC20 has already been identified in the Waipa District Plan as a Future Growth Cell. The area is identified on the Hamilton Airport Growth Map, which is contained in Appendix S1 of the WDP (refer **Figure 2** below).

The map outlines where any further development should be located given the alignment of Southern Links. It is anticipated within the WDP that this future extension is to provide for future industrial land beyond 2035. TPL and RPL have identified that, based on current and projected demand for industrial land, this is needed to be brought forward significantly (i.e., it is required within the short and medium term rather than long term).



FIGURE 2: Appendix S1 of the Waipa District Plan

### 3.0 OUR SUBMISSION

#### 3.1 THE AIRPORT AS A STRATEGIC INDUSTRIAL NODE AND URBAN ENABLEMENT AREA

TPL and RPL support the identification of the Airport and surrounding Airport Business zone as a Strategic Industrial Node and Urban Enablement Area. The Urban Enablement Area should show the full extent of Northern Precinct so that it includes both the blue and red shaded area in Figure 1 – identifying the blue area for short-medium term development and the red area as long-term development. .

Including the full extent of Northern Precinct as an Urban Enablement Area is appropriate for several reasons:

1. It will provide additional business land that is plan-enabled and capable of being infrastructure ready in the short term. This is achieved by a portion (approximately 40ha) of Northern Precinct already having an operative Airport Business zoning under the WDP and there being adequate and feasible infrastructure solutions available to service the land.
2. It will provide additional business land that will be plan-enabled and infrastructure ready in the medium term. This is achieved by including the balance (approximately 90ha) of Northern Precinct proposed under PPC20. A Structure Planning process has already been completed for this area and has demonstrated that there are adequate and feasible infrastructure solutions available to service the land.
3. The Structure Planning that has taken place for Northern Precinct to date has been based on the extent proposed under PPC20 (130ha approximately) but is scalable to include the Northern Precinct Expansion Area (60ha approximately). This long term and strategic approach has been followed to ensure that a well-functioning urban environment can be achieved vs. what would otherwise be possible if TPL were to only focus on the 40ha of Northern Precinct that has an operative Airport Business zoning.
4. Including the full extent of Northern Precinct as Urban Enablement Area improves the ability to strategically plan for and develop the full extent of Northern Precinct in an integrated and comprehensive way. It also provides a balanced settlement pattern for the growth that is planned between Hamilton and the Airport, providing a clear direction for establishing new residential areas that are near future business land / employment opportunities (refer **Figure 3** below).

In the previous section we also provided the background to the Northern Precinct as well how the WDP has signalled that this area will expand in the medium to long term.

The demand for industrial land at the Airport has been significant over the past several years, with uptake being far greater than was predicted when the Northern Precinct was rezoned as part of preparing the WDP. The WDP anticipated that the 40ha extent of the Northern Precinct would accommodate all

medium-term demand and that any extension of the Precinct (as foreshadowed in the District Plan and expanded on in greater detail below) would only be required sometime after 2035.

The significant uptake on demand has meant almost all the industrial land within Southern, Western and Central Precincts has been sold and developed, meaning that the operative Airport Business zoned land within Northern Precinct (40ha) is required to meet demand in the short term (being somewhere between 1-10 years) and the remaining 90ha is needed to accommodate medium term demand (being somewhere between 5-15 years).

TPL and RPL expect that the full 130ha of Northern Precinct will be developed by 2035; a stark contrast to what was predicted to occur even 8 years ago in the 'Airport and Adjacent Land Study (2013)' that was commissioned by the Future Proof Partners where it was expected that the first 40ha would provide enough supply until 2035 (with the additional 90ha only required to be supplied after 2035).

This accelerated demand means that it is also prudent to identify how the Northern Precinct could be expanded in the longer term. Both Waipa District Council and TPL have identified an area of approximately 60ha that sits between Northern Precinct (to the east) and the Southern Links designation (to the west) as a logical and plan enabled expansion area. Identifying the Northern Precinct Expansion Area for long term development and including it within the Urban Enablement Area will; (1) ensure it is plan-enabled; and (b) improve the effectiveness and efficiency of integrated infrastructure planning and funding.

Signalling the Northern Precinct expansion area as a Future Urban area provides greater certainty to the community of growth areas in the long term (therefore making urbanisation more effective and efficient and less sporadic). It also strengthens the need to protect medium – long term infrastructure such as Southern Links and alternative transport connections (and modes) to the Airport.

The planned development staging (and therefore allocation sought by TPL and RPL) is set out within **Table 1** below. The proposed industrial land allocation for the Airport has been supported by the Insight Economics assessment that is included as **Appendix 1**.

<b>Table 1 – Industrial land allocation</b>			
Strategic Industrial Node	Industrial land allocation and staging		Total allocation to 2050
	2020-2030	2031-2050	
Airport (comprising Northern Precinct and Northern Precinct expansion area)	130ha	60ha	190ha

### **3.2 THE IMPORTANCE OF SOUTHERN LINKS**

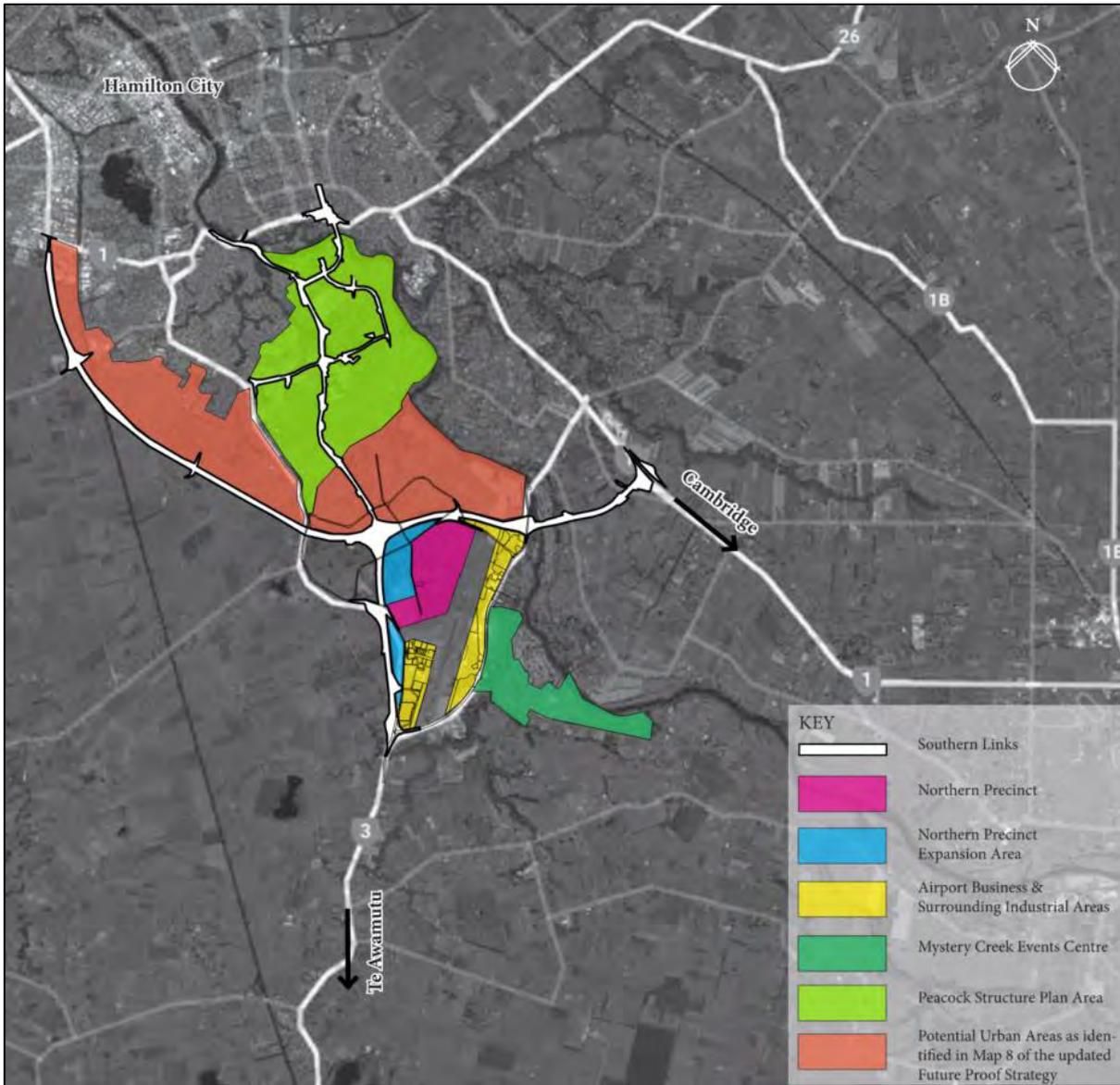
The long-term vision for the growth of the Airport employment node and Southern Links is embedded into various strategic city/district, regional and national policy documents. As set out in those documents, the Southern Links transport network is integral to the growth of Hamilton City including the Peacockes growth cell and is important to the continued growth and development of the Airport and surrounding Airport Business zone.

Southern Links is also an important transport network for maintaining and improving efficient connections between the Airport and Hamilton city without undue congestion (i.e., an efficient land transport system) and adds resilience into the Hamilton strategic transport network.

The implementation of Southern Links will ultimately release the full potential of the Northern Precinct (including Northern Precinct expansion area) as a well-functioning urban environment and strategic industrial node. This includes the ability to establish a direct connection from the Northern Precinct to the new Southern Links central interchange, just north of Middle Road. The benefits that Southern Links provides to the Airport and Airport Business zone therefore plays an important role in enabling the growth of the Southern Metro Corridor and Waikato Region.

Southern Links also supports several safety objectives. It comprehensively addresses the known safety issues at the Narrows Bridge, the SH21/Raynes Road intersection and the SH3/Raynes Road intersection, amongst others. It represents an efficient investment in a comprehensive long-term solution, rather than 'stop-gap' safety treatments.

Southern Links will provide economic and employment benefits to the existing and future growth of the Airport, surrounding Airport Business zone and Southern Metro Corridor. Figure 4 below provides the context of Southern Links in relation to the growth that has occurred and is planned to occur within the Southern Metro Corridor. It demonstrates that Southern Links is vital for achieving a well-functioning urban environment within the corridor.



**FIGURE 4:** Shows the growth that has already occurred and what is planned to occur between the Airport and Hamilton City.

Southern Links can be and should be built in stages. With the development in the Peacockes growth cell, there is an opportunity to dovetail with the work being undertaken by Hamilton City Council and enable the Central interchange and northern network to that intersection to be constructed. Construction of this portion of Southern Links will connect the Airport to the Peacockes growth cell (and central Hamilton) for employment and living opportunities, will enable the full potential of Northern Precinct to be realised and will provide improved public transport opportunities to and from the Airport. The east-west connections of Southern Links can be segmented separate to this package.

Southern Links can only be built if funding is provided for it and if strategic documents, such as the Future Proof strategy, recognise its importance and advocate for it. Without it, the continued economic growth at the Airport and housing opportunities within Peacockes will increase pressure on the local transportation network.

Southern Links will also help foster public transport connections between Hamilton City and the Airport as it includes provision for multiple travel modes. Both the Metro Spatial Plan and the Future Proof strategy seeks to achieve a 'radical transportation shift' to a multi-modal transport network that includes the establishment of rapid and frequent public transport.

Projects that give effect to that objective and the vision of the Metro Spatial Plan, such as Southern Links, should be supported and advocated for. Access to frequent public transport in the future will also better enable the development and functioning of the Airport Business zone as a Strategic Industrial Node within the region.

#### **4.0 TPL & RPL SEEK THE FOLLOWING DECISION FROM THE WAIKATO REGIONAL COUNCIL**

- a) The retention and amendments to the provisions set out within **Appendix 2** and **3**;  
and
- b) Such other additional or consequential relief as is necessary to achieve consistency with the above and to satisfy the concerns of the submitter.  
or
- c) Such other alternative relief to satisfy the concerns of the submitter.

4. TPL and RPL wish to be heard in support of my submission.

5. If others make a similar submission RPL and TPL will not consider presenting a joint case with them at a hearing.

Signature:



Nick Grala – National Planning & Environment Manager

Date: 16 December 2022

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# APPENDIX 1



Final Report: 15 December 2022

## Assessment of the Amount of Industrial Land Allocated to the Airport in PC1 to the WRPS

Prepared for:  
**TPL & RPL**

**Authorship**

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# 1. Introduction

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## 1.1 Context & Purpose of Report

Proposed Change 1 to the WRPS (PC1) was recently notified and seeks to update various aspects of the RPS to reflect the requirements of the NPS-UD, and to align with the updated Future Proof strategy. It results in the revised industrial land allocation reproduced below.

Table 1: Proposed New WRPS Industrial Land Allocations via PC1 (Ha of Gross Development Area)

Strategic Industrial Nodes	2020-2030	2031-2050	Total (30 yrs)
Pōkeno	5	48	53
Tuakau	26	77	103
Huntly/Rotowaro/Ohinewai	77	-	77
Horotiu/Te Rapa North/Rotokauri	189	50	239
Ruakura/Ruakura East	172	245	417
Hamilton Airport/Southern Links	94	46	140
Hautapu	67	160	227
<b>Totals</b>	<b>630</b>	<b>626</b>	<b>1,256</b>

Titanium Park Limited (TPL) & Rukuhia Properties Limited ('RPL') are the largest owners within the industrial node at the Airport. They consider that the new allocations fail to acknowledge the merits and importance of the airport as a sub-regional hub of future economic activity. Accordingly, they seek relief that increases the airport's industrial land allocation from 94 ha to 130 ha over the first 10 years, and a further 46 hectares to 60 hectares over the following 30 years (i.e. from a total of 140 ha to a total of 190 ha). This report considers the need for, and economic merits of, the proposed new airport land allocations.

## 1.2 Key Findings of this Report

The key findings of this report are that:

- Our economic assessment for PC20, and the latest business capacity assessment for Future Proof, both reveal significant pending shortfalls in industrial land, especially in the long term.
- This is reinforced by new (2022) employment data, which show a huge uptick in industrial activity in both Hamilton City and Waipa District.
- Expanding the airport's northern precinct to meet the Southern Links designation, which would provide about 60 hectares of land, is one logical way to help address the shortfall.
- Plus, it makes economic sense because the airport is an accessible, regionally significant asset that is located right next to the city's largest growth cell (Peacocke).
- The rapid uptake of prior land releases at the airport also demonstrates a strong demand for establishing there, which will only strengthen over time as aircraft movements begin to regain momentum in a post-pandemic world.

- Finally, expanding the airport’s northern precinct will also secure significant and enduring economic advantages, including agglomeration benefits, greater infrastructure efficiency, synergies with planned investments in roading and wastewater capacity, and increased certainty to underpin ongoing investment in and around the airport.
- Accordingly, we strongly support the proposed expansion of the airport’s industrial land allocations on economic grounds.

### **1.3 Structure of Report**

The remainder of this report is structured as follows:

- **Section 3** considers the need for additional sub-regional industrial capacity be identified and rezoned to meet future needs;
- **Section 4** explains why the airport is an ideal place to accommodate extra industrial land; and
- **Section 5** lists the likely economic benefits of such an expansion.
- **Section 6** provides an overall summary and conclusion.

## 2. Need for Extra Airport Industrial Land

### 2.1 Summary of PC20 Economic Assessment

Earlier this year, we provided a detailed economic assessment for the proposed expansion of the airport’s northern precinct (i.e. PC20). It acknowledged that the airport is in Waipa District but focussed on the potential need for additional industrial land to meet the needs of Hamilton City as the airport is very close and effectively forms part of its broader property market. Our assessment found that extra industrial land will be required in and around Hamilton over all NPS-UD timeframes to meet the sub-region’s obligations (to provide at least sufficient business land capacity at all times). PC20 recognises and responds to that requirement.

### 2.2 Findings of 2021 Business Capacity Assessment (BCA)

The latest Business Capacity Assessment (BCA) for the sub-region was published in June 2021 after our assessment for PC20 was finalised. It notes that much of Hamilton City’s previous industrial floorspace capacity has been absorbed since the last assessment in 2017, with 96% of the city’s remaining vacant industrial land residing in only 2 areas (Te Rapa and Ruakura)<sup>1</sup>. However, according to HCC’s submission on PC20, both areas face binding constraints that limit their industrial land supply over the short-medium term (which HCC suggest PC20 can and should help address).

Given the high concentration of the city’s industrial land in two nodes that are both materially constrained, it is no surprise that the BCA identified insufficient industrial capacity across all city nodes, except Ruakura. Figure 1 provides the details.

Figure 1: Hamilton City Long Term Industrial Sufficiency Summary (ha)

Name	Demand Growth + Margin (ha)			Estimated Land Availability (ha)			Sufficiency Measure		
	Short Term (+20%)	Medium Term (+20%)	Long Term (+15%)	Short Term	Medium Term	Long Term	Short Term	Medium Term	Long Term
Te Rapa	51.4	177.0	328.7	99.3	99.3	278.0	Insufficient	Insufficient	Insufficient
Chartwell	0.5	1.7	4.8	-	-	-	Insufficient	Insufficient	Insufficient
Frankton	0.8	25.8	92.3	21.1	21.1	21.1	Insufficient	Insufficient	Insufficient
CBD	5.2	21.0	64.5	-	-	-	Insufficient	Insufficient	Insufficient
Ruakura	0.3	6.0	22.0	145.8	212.6	336.6			
Other	4.5	34.2	108.2	4.1	4.1	4.1	Insufficient	Insufficient	Insufficient
<b>Total</b>	<b>62.7</b>	<b>265.8</b>	<b>620.6</b>	<b>270.3</b>	<b>337.0</b>	<b>639.7</b>			

The BCA goes on to state that localised industrial land demand exceeds available capacity by the greatest margin across all business land types assessed, especially in Hamilton City.<sup>2</sup> Accordingly, it suggests that, where significant localised industrial land shortfalls exist, “demand apportioned to specific reporting areas could easily be met in other parts of the TA or the wider sub-region.”<sup>3</sup>

In other words, there is a degree of flexibility in the matching of industrial land demand to locations. That proposition then leads to the following conclusion about the ability for other areas to help address shortfalls:

<sup>1</sup> Page 84

<sup>2</sup> Page 89

<sup>3</sup> Ibid.

“It makes sense to look at demand and capacity as somewhat trans-locational and see the sub-region as a reasonably well-connected network of nodes. In most cases areas where there are insufficiencies will have adjacent areas with ample capacity which are easy to access or make sense from a co-location point of view.”<sup>4</sup>

We agree, and consider this conclusion to be particularly relevant to PC20, which is less than three kilometres from the area expected to experience the largest industrial land deficits – Hamilton City – and is even closer to the sub-region’s largest population growth node (Peacocke).

## 2.3 Problems with the BCA’s Methodology and Conclusions

Although we strongly support and endorse the BCA’s conclusions about needing additional industrial land to meet the city’s looking shortfalls, we consider the BCA to significantly understate the extent of those deficits for several reasons. The appendix provides the details, but to summarise:

- the BCA assumes that all vacant industrial land will be feasible to develop, and will be developed, over the next 30 years. In practice, significant tracts won’t be feasible to develop and/or won’t be developed regardless, because of various factors that limit market supply. These factors include lack of owner development intentions and/or abilities, land banking, site and infrastructure constraints, owner operational and financial constraints, and so on. Consequently, actual future market supply will only ever be a fraction of the BCA’s capacity estimates, especially over the short to medium term.
- The BCA implicitly treats all sources of capacity as the same, which masks subtle yet important differences across sites and locations. For example, some industrial land users may need very large sites, or to be located near specific customers and/or suppliers. Others require a high stud and/or a large yard capable of handling regular truck movements. Many will also seek a freehold site, and therefore be deterred by leasehold opportunities, such as those at Ruakura. However, the BCA naturally can’t address these fine-grained considerations and instead effectively assumes that all plots of land are perfectly substitutable.
- The BCA uses a multi-criteria analysis (MCA) to compare industrial land nodes across the sub-region and to assess whether vacant land resides in desirable areas. Notwithstanding the failure to explicitly consider feasibility the MCA itself is based on sector views garnered nearly five years ago in January 2018. Clearly, we are in a different market now, both from a macroeconomic perspective, and also in terms of the property market cycle, so relying on such old information won’t help choose where and when to best add new capacity over time.
- The BCA implicitly assumes that most of the land earmarked for investigation under the Waikato 2070 strategy could/will become capacity into the future. However, they immediately qualify that by noting there is no guarantee that the areas under investigation will be re-zoned or result in capacity, but this important caveat is not captured in the broader narrative of the report.

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<sup>4</sup> Page 90

- The BCA also does not appear to incorporate the impacts of other national policy statements that have recently been enacted or updated, and which significantly curtail future development opportunities. Specifically, it does not mention the NPS on Freshwater, and it was published prior to the NPS HPL, so the impacts of both naturally are not reflected in BCA's assessment of industrial development capacity either.
- Page 35 of the BCA states that the airport business zone has been included, but it does not appear in any of the subsequent maps, figures, or tables. This makes it difficult to assess whether or how it has adequately recognised the strategic importance of the airport in meeting future industrial land needs.
- The BCA assumes a floor are ratio (FAR) of 38% for industrial land based on recent development patterns, but the latest data from Core Logic reveals a much lower FAR for industrial buildings developed in the city since 2010 of only 23%. This factor alone reduces the floorspace capacity of vacant industrial land in the BCA by 40%.

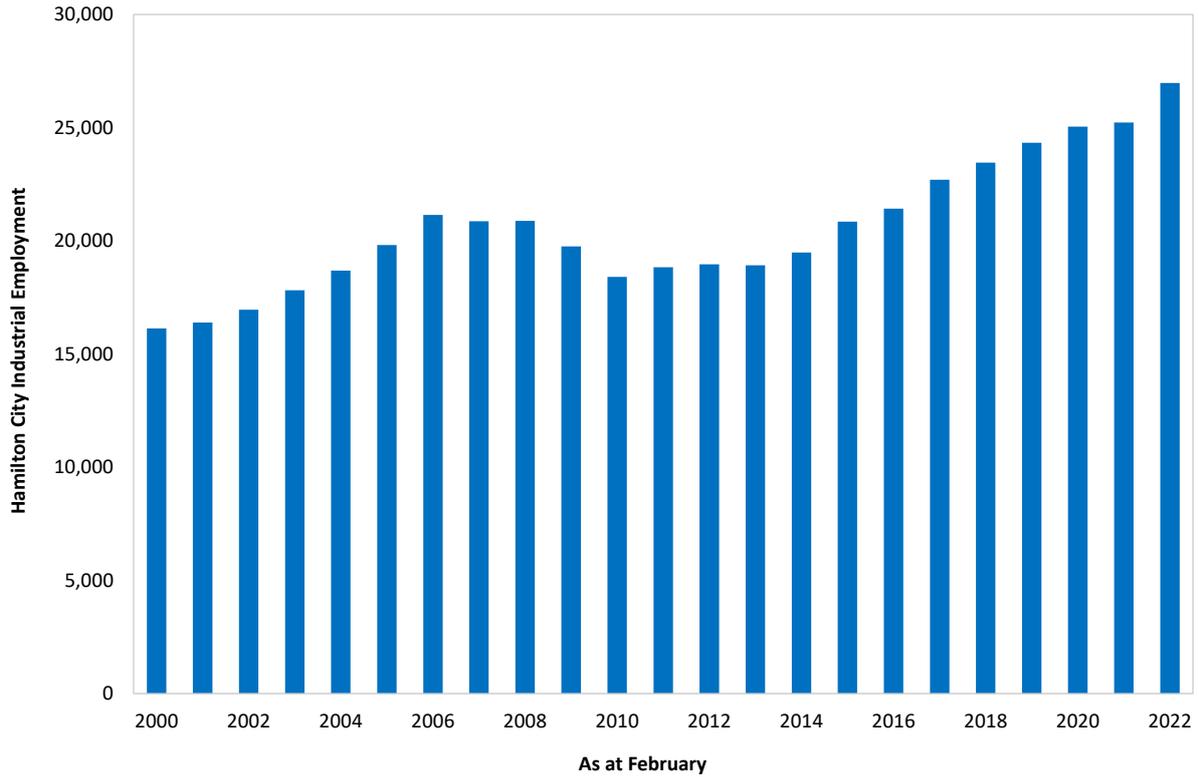
Accordingly, the BCA is likely to significantly understate the additional industrial land required to serve future demand and meet NPS-UD obligations.

## 2.4 Implications of New Employment Data

The BCA is now 18 months old, and many of its core datasets are even older. For example, its estimates of future industrial land demand are based on employment from February 2020. Fortunately, new employment data are now available, and they signal that industrial land demand will be stronger than the projections in our previous assessment and the 2021 BCA.

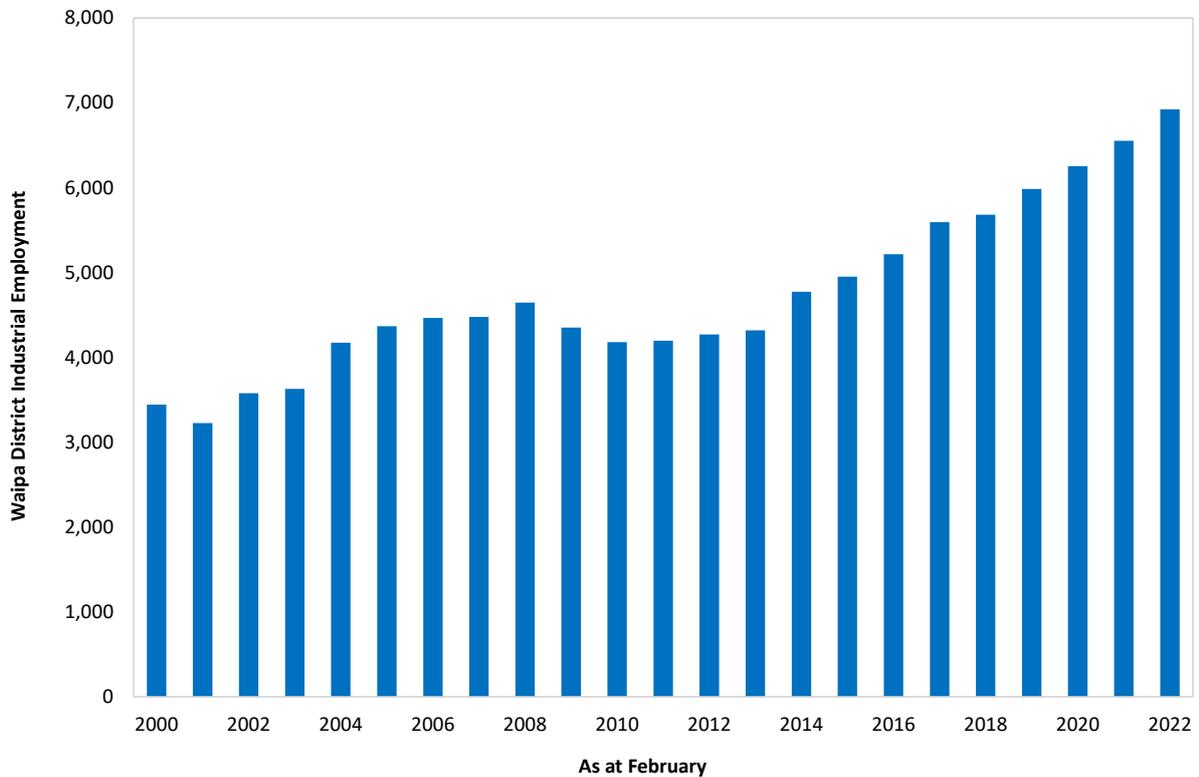
To summarise: in our PC20 assessment, we projected city industrial employment to increase from 25,300 workers in 2021 to 26,900 by 2026, an increase of 1,600 jobs. However, our estimate of 26,900 workers by 2026 was already surpassed in February 2022 (i.e. four years early) due to an unparalleled surge in industrial activity since the pandemic. This is demonstrated in the figure below, which plots the city's industrial employment since 2000. The uptick in 2022 is evident, and represents the largest annual percentage change in the city's industrial employment over the last 22 years.

Figure 2: **Hamilton City** Industrial Employment



A similar trend has occurred in Waipa, too, as shown in the corresponding industrial employment chart. It is also experiencing significant, sustained growth in industrial employment that is unlikely to be fully reflected in the BCA’s demand estimates, which further reinforces the need for PC20.

Figure 3: **Waipa District** Industrial Employment



## **2.5 Summary and Conclusion**

With industrial employment growing much faster than forecast (by us and in the BCA), and with both assessments (ours and the BCA) already identifying the need for significant boosts in supply to meet pending shortfalls, it seems clear that additional industrial land will indeed be required in and around Hamilton over time. And, as we explain in the next section, the Airport is ideally placed to fill the gap.

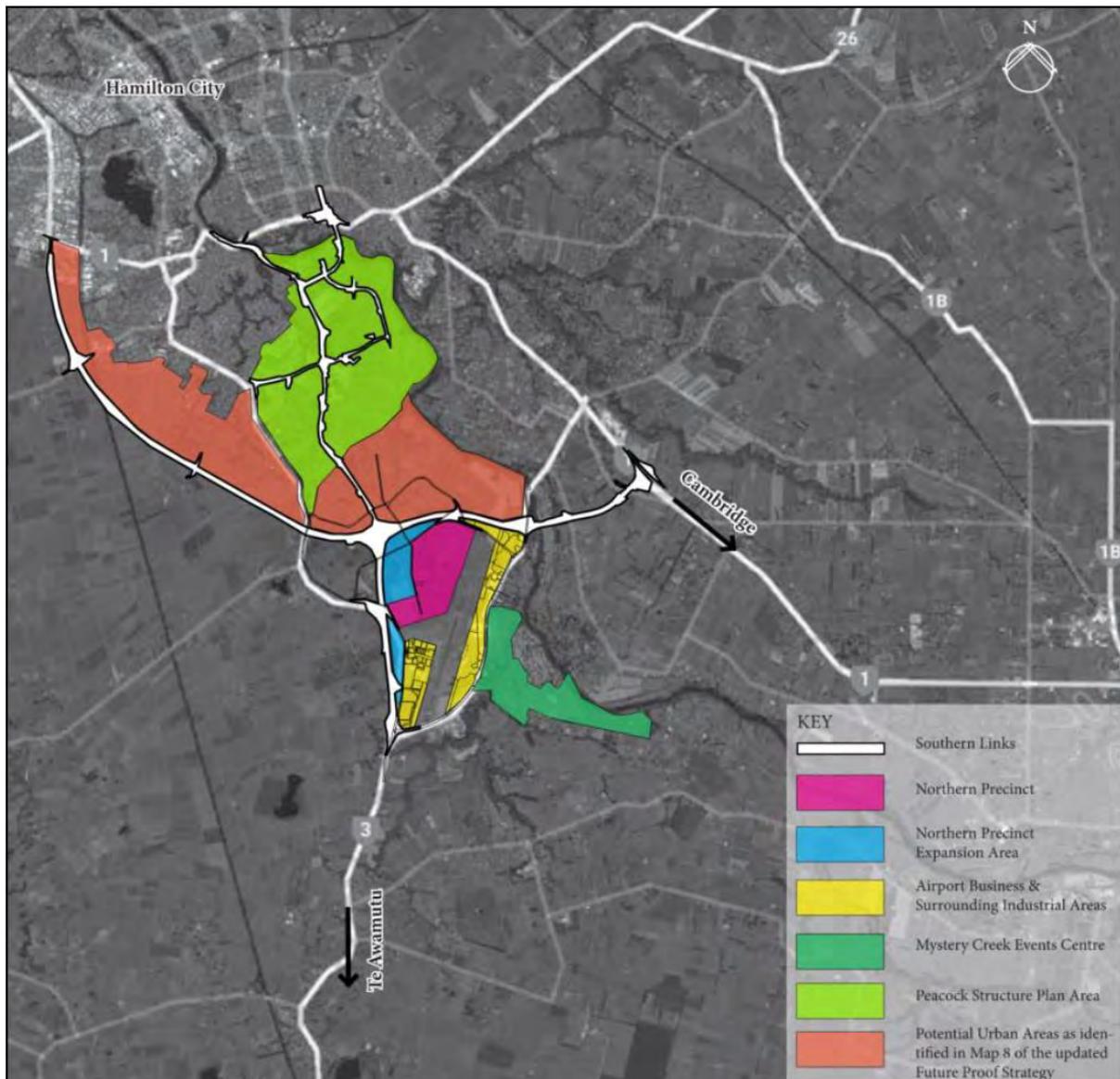
### 3. Merits of the Airport for Industrial Use

This section explains why the airport is an ideal location to accommodate additional industrial growth.

#### 3.1 Airport is Highly Accessible & Regionally Significant

As noted earlier, the latest HBA identified large shortfalls in sub-regional industrial capacity, especially in the city, and suggested that these be addressed by taking a broader view of supply and demand that transcends local Government boundaries. We agree with this conclusion and note that the airport is a regionally significant transport hub adjacent to key road and rail networks, and located only 2km from the city’s southern boundary. It is also very close to the city’s largest future growth node (Peacocke), which may drift even closer to the airport if potential new growth areas south of Peacocke – known as SL1 and SL2 – proceed. This proximity is demonstrated in Figure 4 below.

Figure 4: Proximity of the Northern Precinct to Peacocke & its Potential Southward Expansion

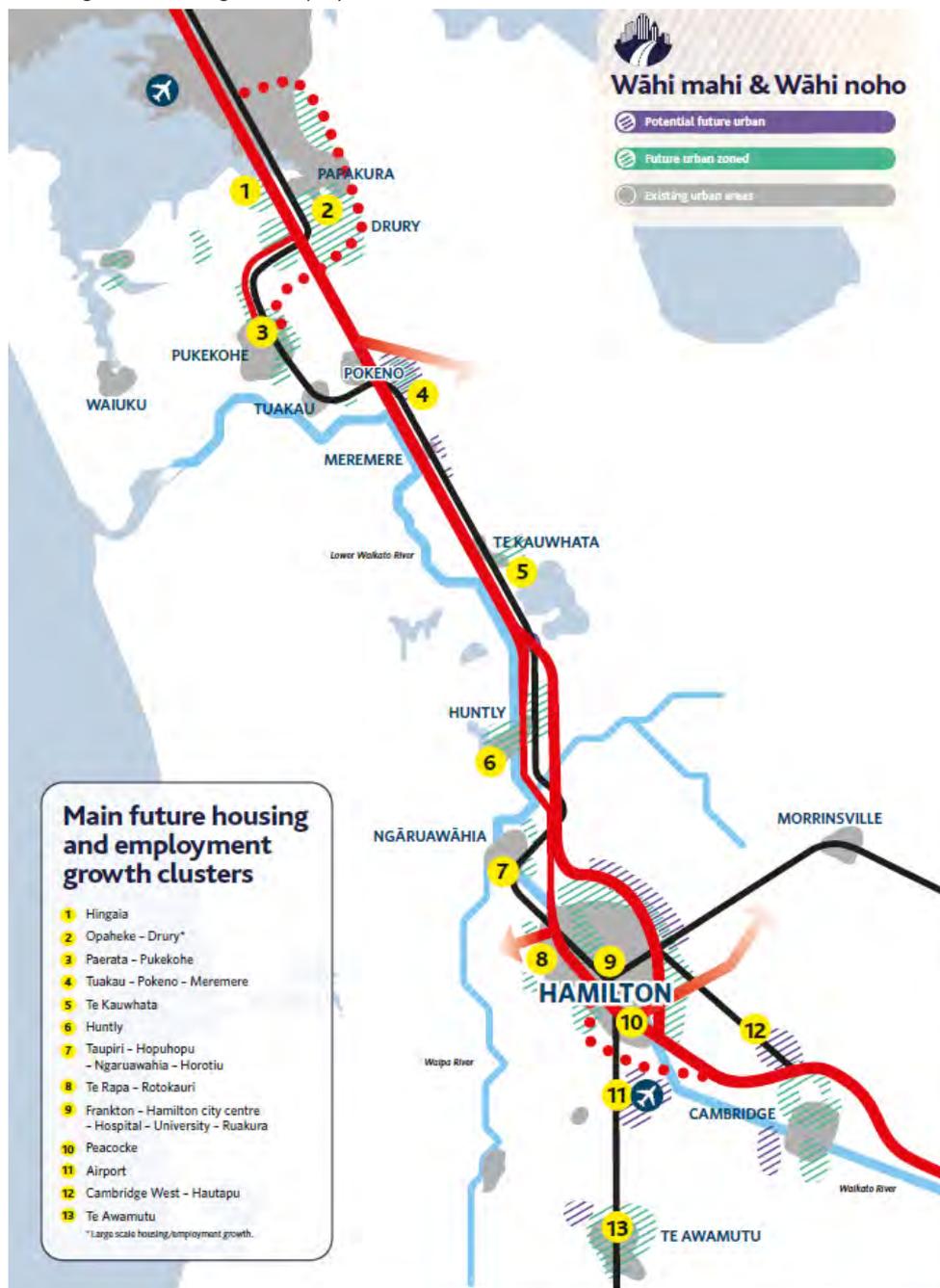


The airport is also a key economic driver whose influence extends far beyond the Waipa district. Accordingly, its strategic role and importance have been acknowledged in both the WRPS itself, and

several other strategies and reports, including the Waipa District Plan, Waipa 2050, the Metro Spatial Plan, and the Auckland-Hamilton Corridor Plan & Implementation Programme

Given the airport’s highly accessible location and its sub-regional role and function, expansion of its northern precinct – from a total of 130 to 180 hectares. as sought by TPL & RPL – will also help give effect to multiple strategic imperatives. For example, the Metro Spatial Plan envisions a metro area growing to 500,000 people where development and resources are connected and not artificially limited by local Government boundaries. Similarly, the Corridor Plan identifies the airport as one of only a handful of future employment growth clusters, as illustrated in the map below.

Figure 5: Housing and Employment Growth Clusters in Auckland-Hamilton Corridor Plan



### 3.2 Proven Demand for the Site

Demand for industrial land at the airport has surpassed all expectations over the last few years, with no land left that isn't held for specific aeronautical uses. For example, when the first 40 hectares of the northern precinct were rezoned as part of the last Waipa District Plan process, it was expected to absorb all medium-term demand, with any future extensions not required until sometime after 2035. However, the need to expand the northern precinct has now been reached 12 years earlier than that.

At this stage, TPL expect 130 hectares of the northern precinct to be required to meet demand over the next 10 or so years, with another 60 hectares needed beyond that to meet longer term demand. This makes sense to us and, importantly, there are few – if any – other places to accommodate additional industrial land beyond the 30-year horizon of the BCA.<sup>5</sup>

### 3.3 Impacts of Future Air Traffic Growth

Hamilton Airport is the only commercial airport in the Waikato region, so it serves a truly regional role and function. It has the third-longest civilian runway in New Zealand and caters for scheduled domestic services plus a wide range of general aviation traffic. Pre-Covid, it was the second-busiest regional airport for certified air movements, attracting over 140,000 aircraft movements per annum.

Like virtually every airport in the world, Hamilton Airport was hit hard by the pandemic and the consequent decline in air travel. However, activity has started to pick up again with the most recent projections indicating that December 2022 will be the busiest month in more than three years.<sup>6</sup> This surge in activity will be met by a refreshed terminal that ensures a more comfortable and seamless travel experience, thereby helping to induce further travel growth. The upgrades include:<sup>7</sup>

- a plush new departure area;
- brand new furniture, fittings, and flooring;
- more dedicated work-spaces for travellers; and
- a modern, new colour scheme that reflects the natural colour pallet of the Waikato region.

Over time, as the world recovers from the pandemic and the airport's passenger and freight volumes continue to rebuild, the increased activity create further demands for airside and landside activities to support it. The expansion of the northern precinct will assist to absorb some of the additional landside demand arising from this renewed travel activity

### 3.4 TPL & RPL are a Willing and Able Developer

Finally, we note that both TPL and RPL are a willing and able developer that wants to bring its land to the market as quickly as possible. Thus, it will be in a high state of readiness once rezoning is complete, enabling it to provide a sustained and reliable increase in supply to help meet ongoing growth in demand.

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<sup>5</sup> As noted by HCC in their submission on PC20.

<sup>6</sup> <https://hamilton.govt.nz/your-council/news/growing-hamilton/hamilton-airport-ready-to-reach-new-heights>

<sup>7</sup> <https://www.hamiltonairport.co.nz/blog/post/92478/hamilton-airports-15m-post-covid-makeover/>

## 4. Benefits of Northern Precinct Expansion

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TPL and Waipa District Council have both previously identified the merits of expanding the northern precinct to meet the edge of the southern links (SL) designation. This was echoed in HCC's submission on PC20, which independently reached the same conclusion. In our view, and especially given the airport's unique strategic role and location (as per the previous section), its proposed expansion will generate significant economic benefits while avoiding any material economic costs.

For example, expansion will:

- Enable greater critical mass to establish around the airport over time, which will help achieve agglomeration benefits. These are a type of economic efficiency that arises through the co-location of economic activities, which helps reduce transport costs and lift the average productivity of firms (for example, through the sharing of labour, assets, and ideas);
- Maximise infrastructure efficiency by spreading the costs of bulk network upgrades over a greater land area and/or a larger number of lots;
- Create synergies with planned investments in roading and wastewater capacity, particularly the Southern Links, while ensuring a planned and integrated approach to land use and infrastructure provision;
- Enable the site's locational benefits to be maximised, including its multimodal potential (connecting road and rail with air);
- Provide an easily accessible employment node to meet employment growth arising from the adjacent Peacocke growth cell; and
- Provide certainty to encourage investment in the airport.

## 5. Summary and Conclusion

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This report has shown that the sub-region needs to identify and rezone additional industrial land to keep pace with demand, and that the airport is an ideal place to locate some of that by expanding the northern precinct to meet the Southern Links designation.

This report has shown that, given the airport's strategic role and highly accessible location, expanding the northern precinct will unlock a wide range of enduring economic benefits. Accordingly, we support it on economic grounds.

## 6. Appendix: 2021 BCA Critique

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While we acknowledge the significant body of work informing the BCA and agree with its overall conclusions on industrial land sufficiency, we consider it to significantly understate the likely magnitude of this shortfall. There are several reasons, as briefly explained below.

### 6.1 Market Supply vs Vacant Land

Unlike residential land, whose ability to meet demand is assessed by explicitly modelling the feasibility of development on a parcel-by-parcel basis, the BCA simply assumes that all vacant industrial land will be feasible to develop, and will be developed, over the next 30 years. This is an extreme and highly unlikely assumption. In practice, significant tracts of land won't be feasible to develop and/or won't be developed regardless, because of several factors that limit market supply, particularly over the short to medium term. They include:

- *Developer intentions* - some landowners have no clear intention to develop their land, particularly over the short- to medium-term, nor to sell to others that may have clearer development intentions and capabilities.
- *Land banking and drip-feeding* – other landowners may intend to develop in future, but are currently withholding supply to capitalise on inevitable land price inflation, while some are drip-feeding supply to maintain prices and hence maximise returns.
- *Constraints* – the BCA appears to consider only infrastructure as a potential constraint, thereby overlooking several other factors that affect may also affect the developability of land, such as reverse sensitivity, contamination, difficult access, and/or awkward topography.
- *Operational capacity* – some landowners face operational capacity constraints, which limit the number of new sections/dwellings that they can supply per annum.
- *Financing* – similarly, some landowners face capital/financing constraints that also limit their ability to supply.

We also note that the BCA implicitly treats all sources of capacity as the same, which can mask subtle yet important differences across sites and locations. For example, some industrial land users may need very large sites, or to be located near specific customers and/or suppliers. Others require a high stud and/or a large yard capable of handling regular truck movements. Many will also seek a freehold site, and therefore be deterred by leasehold opportunities, such as those at Ruakura.

However, the BCA naturally can't address these fine-grained considerations. Instead, it simply provides an aggregated assessment of supply and demand, where all plots of land are treated as perfectly substitutable. In doing so, it masks the specific site and location requirements of many industrial land users and therefore overstates the adequacy of the current land inventory

## **6.2 Reliance on Old Information**

The BCA uses a multi-criteria analysis (MCA) to compare the suitability and desirability of different industrial land nodes across the sub-region to assess whether vacant land resides in areas that are likely to be developed. Notwithstanding our earlier reservations, namely that this tells us nothing about the feasibility or likely uptake of said land, the MCA itself is based on sector views garnered nearly five years ago in January 2018.

Clearly, we are in a different market now, both from a macroeconomic perspective, and also in terms of the property market cycle, so relying on old such information won't help choose where and when to best add new capacity to meet future demand.

For example, the sector feedback and views embedded in the BCA predate the Covid-19 pandemic, which wrought unprecedented economic turmoil and caused construction costs to balloon. The impacts of those cost spikes on development viability have since been compounded by the recent rapid recovery of interest rates, which are another key piece of the development feasibility puzzle. However, these effects postdate and hence elude the BCA.

## **6.3 Inclusion of Indicative Future Capacity from Waikato 2070**

On page 75 of the BCA in a discussion about its limitations, the authors disclose their implicit assumption that most of the land earmarked for investigation under the Waikato 2070 strategy could become capacity into the future. However, they immediately qualify that by noting there is no guarantee that the areas under investigation will be re-zoned or result in capacity, but this important caveat is not captured in the broader narrative of the report.

## **6.4 Impacts of Other Policy Statements**

The BCA also does not appear to incorporate the impacts of other national policy statements that have recently been enacted or updated, and which significantly curtail future development opportunities. Specifically, it does not mention the NPS on Freshwater, and it was published prior to the NPS HPL, so the impacts of both naturally are not reflected in BCA's assessment of industrial development capacity either.

## **6.5 Exclusion of the Airport Business Zone**

Page 35 of the BCA states that the airport business zone has been included, but it does not appear in any of the subsequent maps, figures, or tables. This makes it difficult to assess whether or how it has adequately recognised the strategic importance of the airport in meeting future industrial land needs.

## **6.6 Assumed Development Intensity**

The BCA adopts what it calls "realistic industrial supply" estimates by assuming a floor are ratio (FAR) of 38% for industrial uses based on recent development outcomes across the sub-region. It notes that this is significantly lower than the FAR enabled by planning rules, and thus reduces capacity. We acknowledge this, but the latest property-level data for Hamilton City (from Core Logic) reveals a much lower FAR for industrial buildings developed since 2010, as tabulated below. This directly reduces the development capacity of vacant land identified in the BCA.

Table 2: Industrial Building Floor Area Ratios for the Broader Hamilton City Market (built since 2010)

<b>Industrial Land Uses by Core Logic Classification</b>	<b>Land Area ha</b>	<b>GFA m<sup>2</sup></b>	<b>FAR</b>
Industrial, Food Processing and Food Storage, Provincial	1	2,840	40.0%
Industrial, Food Processing and Food Storage, Suburban	1	2,910	28.2%
Industrial, Heavy Manufacture, suburban	22	19,020	8.6%
Industrial, Light Manufacture, provincial	2	6,560	29.1%
Industrial, Light Manufacture, suburban	7	33,930	48.2%
Industrial, Other/Mixed, Provincial	0	870	27.9%
Industrial, Other/Mixed, suburban	4	15,180	40.4%
Industrial, Service, Provincial	3	9,870	37.7%
Industrial, Service, Suburban	13	54,650	42.6%
Industrial, Warehouse, Province	33	10,750	3.2%
Industrial, Warehouse, Suburban	19	88,690	46.7%
<b>All Industrial Land Uses</b>	<b>105</b>	<b>245,260</b>	<b>23.3%</b>

# APPENDIX 2

SUBMISSION TABLE: WAIKATO REGIONAL POLICY STATEMENT PROPOSED CHANGE 1 – NATIONAL POLICY STATEMENT ON URBAN DEVELOPMENT 2020 AND FUTURE PROOF STRATEGY UPDATE			
SUBMISSION POINT	PROVISION	TPL& RPL SUBMISSION	RELIEF SOUGHT (DELETIONS UNDERLINED, ADDITIONS IN STRIKETHROUGH)
<b>1.6 Definitions</b>			
1	Urban Environment	Support	Retain as notified
2	Well-functioning urban environments	Support	Retain as notified
<b>2.1 Proposed Changes to ‘SRMR – Significant resource management issues for the region’ section</b>			
3	SRMR-I4-Managing the built environment	Support	Retain as notified
4	SRMR-PR4-Managing the built environment	Support	Retain as notified
<b>2.2 Proposed changes to ‘IM – Integrated management’ section</b>			
5	IM-O5 – Climate change	Support	Retain as notified
<b>4.1 Proposed changes to ‘EIT -Energy, infrastructure and transport’ section</b>			
<b>Principle reasons</b>			
6	EIT-PR1 – Significant infrastructure and energy resources	Support	Retain as notified
<b>4.2 Proposed changes to ‘UFD – Urban form and development’ section</b>			
7	UFD-O1 – Built environment	Support	Retain as notified
8	UFD-P11 – Adopting Future Proof land use pattern	Oppose in part  The alternative land release requirements in clause (7) of the policy are clear that justification must be provided for out-of-sequence or unanticipated development by demonstrating consistency with the principles of the Future Proof land use pattern (which are contained in APP11). Clause (7) also refers to the responsive planning criteria in APP13 but only in terms of determining whether an urban development proposal is ‘significant’. This is consistent with the clause 3.8 and Policy 8 of the NPS-UD. However, other provisions in WRPS Change 1 are inconsistent with Policy UFD-P11(7).	Retain as notified
9	UFD-P12 – Density targets for Future Proof area	Support	Retain as notified
10	UFD-P15 – Monitoring and review in the Future Proof area	Support	Retain as notified
11	UFD-M33 – Keeping records on development and infrastructure trends	Support	Retain as notified
12	UFD-M47 – District plan provisions to implement the Future Proof land use pattern	Support	Retain as notified
13	UFD-M48 – Land release in the Future Proof area	Support	Retain as notified
14	UFD-M49 – Out-of-sequence or unanticipated urban development	Oppose in part  The approach set out in UFD-M49 is inconsistent with UFD-P11.  While clause (7) of UFD-P11 is clear that justification must be provided for out-of-sequence or unanticipated development by demonstrating consistency with the principles of the Future Proof land use pattern (APP11), the policy only refers to APP13 being relevant to determining whether an urban development proposal is ‘significant’. Method UFD-M49 introduces additional requirements for out-of-sequence or unanticipated urban development by requiring assessments against APP13 as part of the determination of whether alternative land release should be allowed at all.  The approach in UFD-M49 conflates the requirement for regional policy statements to include criteria for determining what plan changes will be treated as adding	Amend UFD-M49 to make it consistent with UFD-P11.

**SUBMISSION TABLE: WAIKATO REGIONAL POLICY STATEMENT PROPOSED CHANGE 1 – NATIONAL POLICY STATEMENT ON URBAN DEVELOPMENT 2020 AND FUTURE PROOF STRATEGY UPDATE**

SUBMISSION POINT	PROVISION	TPL& RPL SUBMISSION	RELIEF SOUGHT (DELETIONS UNDERLINED, ADDITIONS IN STRIKETHROUGH)																
		significantly to development capacity (clause 3.8(3) of the NPS-UD) with consideration of whether out-of-sequence or unanticipated urban development should be allowed at all. The same criteria are proposed to be applied to both matters. However, some of the criteria in APP13 are not relevant to determining whether additional development capacity is significant and some of the criteria are not relevant to alternative land release.																	
15	UFD-M62 – Future Proof governance process for out-of-sequence or unanticipated urban development	Support	Retain as notified																
16	UFD-M64 – Public transport	Support	Retain as notified																
17	UFD-M65 – Blue-Green network	Support	Retain as notified																
18	UFD-M66 – Changing amenity values within urban environments	Support	Retain as notified																
19	UFD-M58 – Reporting on development in the Future Proof area	Support	Retain as notified																
20	UFD-M68 – Review of provisions	Support	Retain as notified																
21	UFD-M72 – Interim arrangements	Support	Retain as notified																
22	Principle reasons UFD-PR1 – Planned and co-ordinated subdivision, use and development	Support	Retain as notified																
23	UFD-PR11 – Adopting Future Proof land use pattern	The references to APP13 conflate the requirement for regional policy statements to include criteria for determining what plan changes will be treated as adding significantly to development capacity (clause 3.8(3) of the NPS-UD) with consideration of whether out-of-sequence or unanticipated urban development should be allowed at all. The same criteria are proposed to be applied to both matters. However, some of the criteria in APP13 are not relevant to determining whether additional development capacity is significant and some of the criteria are not relevant to alternative land release.  The submitter generally supports the explanation of the reasons for UFD-M65 in the final paragraph in UFD-PR11 and the directive for the Future Proof partners to develop a cross-boundary blue-green network. However, the explanation should also refer to the importance of preparing the strategy with input from the community and stakeholders, including affected landowners.	Amend UFD-PR11 to make it consistent with UFD-P11. Retain reference to the criteria in APP13 needing to be weighted.  Amend the final paragraph of UFD-PR11 as follows, or similar wording to achieve the outcome sought by the submitter:  “UFD-M65 sets out how the Future Proof partners will collaborate <u>with one another with community, affected landowner and stakeholder involvement</u> to develop a multi-functional, cross-boundary blue-green network which will be a defining spatial concept that aims to restore, enhance, connect and improve the natural environment within the Future Proof sub-region in a way that can integrate with new urban development and improve the liveability of urban areas.”																
24	UFD-PR15 – Monitoring and review in the Future Proof area	Support	Retain as notified																
<b>5.1. Proposed changes to ‘5.1 Appendices’ section</b>																			
25	APP12 – Future Proof tables Table 35 – Future Proof industrial land allocation Hamilton Airport/Southern Links (explanation)	Oppose in part	<p>...</p> <p>Table 35 – Future Proof industrial land allocation</p> <table border="1"> <thead> <tr> <th data-bbox="1852 1409 2228 1524">Strategic Industrial Nodes (based on gross developable area)</th> <th colspan="2" data-bbox="2237 1409 2665 1524">Industrial Land allocation and staging (ha)</th> <th data-bbox="2674 1409 2819 1524">Total allocation 2050 (ha)</th> </tr> <tr> <td></td> <th data-bbox="2237 1482 2377 1524">2020-2030</th> <th data-bbox="2386 1482 2665 1524">2031-2050</th> <td></td> </tr> </thead> <tbody> <tr> <td>...</td> <td></td> <td></td> <td></td> </tr> <tr> <td>Hamilton Airport/Southern Links</td> <td>94 <u>130</u></td> <td>46 <u>60</u></td> <td>140 <u>190</u></td> </tr> </tbody> </table>	Strategic Industrial Nodes (based on gross developable area)	Industrial Land allocation and staging (ha)		Total allocation 2050 (ha)		2020-2030	2031-2050		...				Hamilton Airport/Southern Links	94 <u>130</u>	46 <u>60</u>	140 <u>190</u>
Strategic Industrial Nodes (based on gross developable area)	Industrial Land allocation and staging (ha)		Total allocation 2050 (ha)																
	2020-2030	2031-2050																	
...																			
Hamilton Airport/Southern Links	94 <u>130</u>	46 <u>60</u>	140 <u>190</u>																

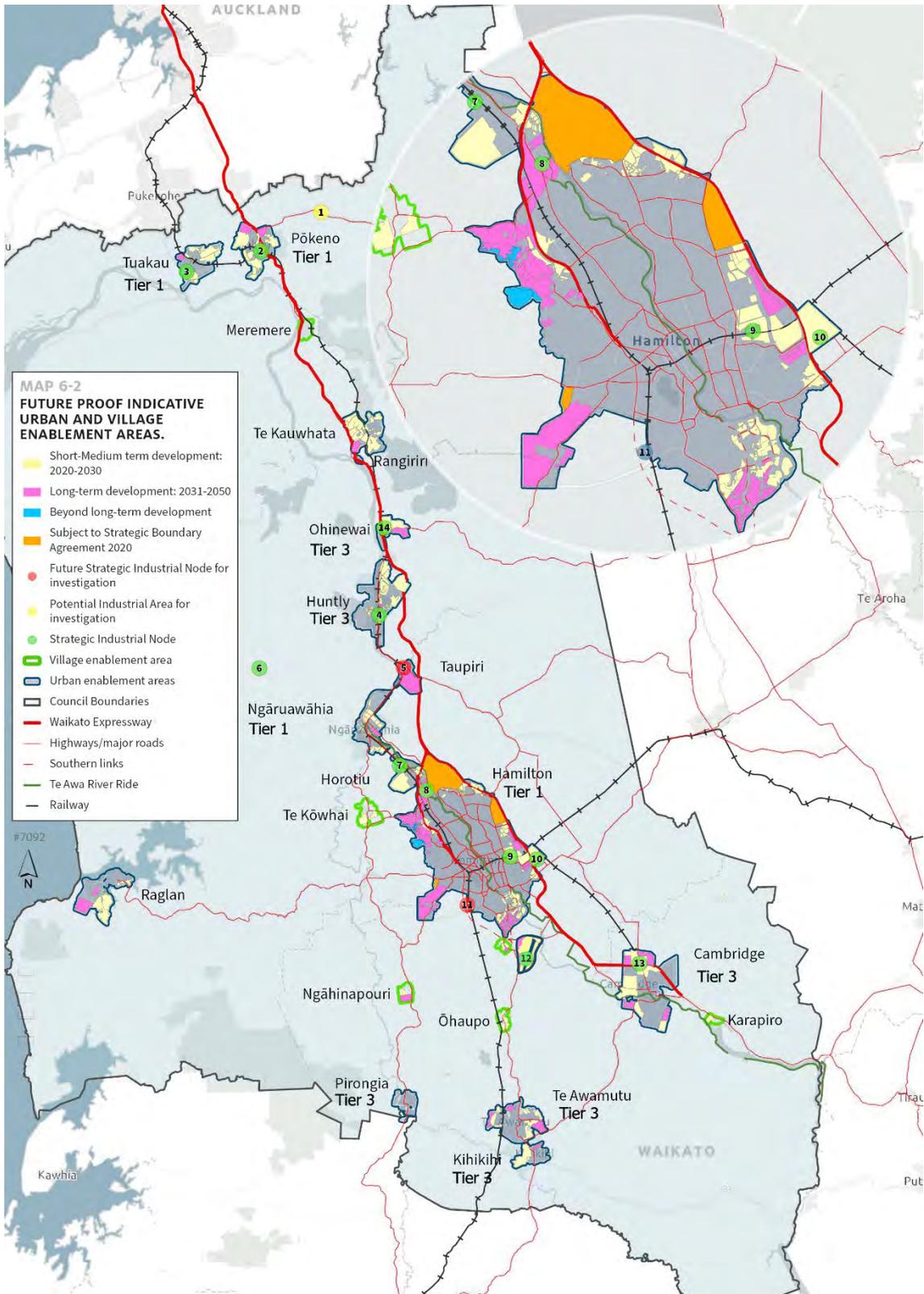
**SUBMISSION TABLE: WAIKATO REGIONAL POLICY STATEMENT PROPOSED CHANGE 1 – NATIONAL POLICY STATEMENT ON URBAN DEVELOPMENT 2020 AND FUTURE PROOF STRATEGY UPDATE**

SUBMISSION POINT	PROVISION	TPL& RPL SUBMISSION	RELIEF SOUGHT (DELETIONS UNDERLINED, ADDITIONS IN STRIKETHROUGH)
			<p>...</p> <p>Explanation                      ...  <b>Hamilton Airport/Southern Links</b>                      The land identified in Table 35 for the Airport /Southern Links is based on the <del>amount of</del>  <del>land currently provided growth direction that is set out within for in</del> the Waipā District Plan and the Waipā growth strategy, Waipā 2050 <del>as well as an additional 60 ha beyond this.</del>  <u>The node includes 130ha within the Northern Precinct that is plan-enabled and infrastructure ready in the short term. A further 60ha is provided as the Northern Precinct expansion area between Northern Precinct (to the east) and the Southern Links designation (to the west) that provides longer term supply.</u>                      The node is currently affected by infrastructure constraints, particularly in the surrounding transport network. The Southern Links project will address some of the transport capacity issues but is currently a long term solution. Infrastructure solutions which are consistent with, and work towards a long term infrastructure pattern will be required to enable development in advance of the construction of Southern Links.</p> <p>...</p>
26	APP13 – Responsive Planning Criteria – Out-of-sequence and Unanticipated Developments (Future Proof local authorities)  General	Oppose in part  APP13 conflates the requirement for regional policy statements to include criteria for determining what plan changes will be treated as adding significantly to development capacity (clause 3.8(3) of the NPS-UD) with consideration of whether out-of-sequence or unanticipated urban development should be allowed at all. The same criteria are proposed to be applied to both matters. However, some of the criteria in APP13 are not relevant to determining whether additional development capacity is significant and some of the criteria are not relevant to alternative land release.	Amend the criteria in APP13 so that they distinguish matters which are relevant to determining significance in terms of clause 3.8(3) of the NPS-UD from other matters that are relevant to alternative land release.
27	APP13 – Responsive Planning Criteria – Out-of-sequence and Unanticipated Developments (Future Proof local authorities)  Clause A, Criteria A	Oppose in part  It would be appropriate to enable demonstrated need or shortfall for housing or business floor space to be demonstrated through a Housing and Business Development Capacity Assessment (HBA) or council monitoring or evidence presented by an applicant. There may be important factors known to an applicant that are unable to be foreseen in a HBA or through council monitoring. Although clause A is relevant for determining what plan changes will be treated as adding significantly to development capacity (clause 3.8(3) of the NPS-UD), it should not be a mandatory requirement for alternative land release. There may be some situations where alternative land release is appropriate to achieve consistency with the development principles in APP11 and to create a well-functioning urban environment despite a short or medium-term need or shortfall not existing.	Amend clause A in criteria A as follows:  “That the development would add significantly to meeting a demonstrated need or shortfall for housing or business floor space, as identified in a Housing and Business Development Capacity Assessment or in council monitoring <u>or in evidence prepared by an applicant</u> ”.

**SUBMISSION TABLE: WAIKATO REGIONAL POLICY STATEMENT PROPOSED CHANGE 1 – NATIONAL POLICY STATEMENT ON URBAN DEVELOPMENT 2020 AND FUTURE PROOF STRATEGY UPDATE**

SUBMISSION POINT	PROVISION	TPL& RPL SUBMISSION	RELIEF SOUGHT (DELETIONS UNDERLINED, ADDITIONS IN STRIKETHROUGH)
28	APP13 – Responsive Planning Criteria – Out-of-sequence and Unanticipated Developments (Future Proof local authorities)  Clauses O, P and Q, Criteria A	Oppose in part  Wahi toitu and wahi toiora are extensive and are mapped at a high level in WRPS Change 1 (Map 44). The use of the directive term ‘avoid’ in clause O means not allowing and there cannot be any exceptions (Environmental Defence Society Inc v New Zealand King Salmon Company Ltd [2014] NZSC 38). This creates a conflict between the WRPS provisions as some of the wahi toitu areas appear to be identified within Urban Enablement Areas where urban development is planned to occur. Clauses O, P and Q may be relevant for determining alternative land release but they are not relevant to determining whether additional development capacity is significant (clause 3.8(3) of the NPS-UD).	Either: a) Amend the criteria related to wahi toitu and wahi toiora in clauses O, P and Q in criteria A to state that they do not apply to development proposals outside of Urban Enablement Areas; or b) Amend the criteria related to wahi toitu and wahi toiora in clauses O, P and Q in criteria A to require that proposals for urban development must consider the values that make the area wahi toitu or wahi toiora and demonstrate that associated effects can be avoided, remedied or mitigated; or c) Amend Map 44 to remove wahi toitu and wahi toiora from Urban Enablement Areas in the same way that they are not shown within Urban Areas.
29	APP13 – Responsive Planning Criteria – Out-of-sequence and Unanticipated Developments (Future Proof local authorities)  Clause K, Criteria A and Clause B, Criteria B	Oppose in part  It is unclear what is meant by the extent to which cost neutrality for public finance can be achieved. It is also unclear how this would be readily demonstrated by plan change proponents. If infrastructure is required to enable an identified need for growth then councils are obliged to proactively plan for and fund the infrastructure. Growth infrastructure is typically funded from a range of sources, including council rates, development contributions and Government subsidies. It would be inappropriate to require the funding to achieve cost neutrality for public finances in all circumstances	Delete references to cost neutrality for public finance in clause K (criteria A) and clause B (criteria B).
5.2.8 Significant transport infrastructure maps			
30	Map 26: Significant transport corridors (Greater Hamilton)	Support	Retain as notified
5.2.10 Future Proof maps (indicative only)			
31	Map 43: Future Proof indicative urban and village enablement areas	Oppose in part	Amend the Map 43 in line with <b>Appendix 3</b> to: a) Include all of the Northern Precinct and Northern Precinct Expansion Area within the extent of the ‘Urban Enablement Area’; and b) Include the PPC20 extent of the Northern Precinct (130ha) as ‘Short – Medium term development: 2020-2030’; and c) Identify the Northern Precinct Expansion Area (60ha) as a ‘Long-term development: 2031-2050’ area; and And retain: d) The identification of the Airport as a ‘Strategic Industrial Node’; and e) Southern links.
32	Map 44: Future Proof wahi toitu and wahi toiora areas	Oppose in part	Amend Map 44 to: a) Include ‘Urban Enablement Areas’; and b) Identify all of the Northern Precinct and Northern Precinct Expansion Area within the extent of the ‘Urban Enablement Area’.

# APPENDIX 3



**Map 43: Future Proof indicative urban ~~limits~~ and village enablement areas**

## ANNEXURE C

# FURTHER SUBMISSION FORM: PROPOSED WAIKATO REGIONAL POLICY STATEMENT CHANGE 1 – NATIONAL POLICY STATEMENT ON URBAN DEVELOPMENT 2020 AND FUTURE PROOF STRATEGY UPDATE



**Important: Save this PDF to your computer before answering. If you edit the original form from this webpage, your changes will not save. Please check or update your software to allow for editing. We recommend Acrobat Reader.**

**We must receive your further submission by 5.00 pm, 15 February 2023**

## MANDATORY INFORMATION

Name of submitter (individual or organisation): \_\_\_\_\_

Contact person (if applicable): \_\_\_\_\_

Agent (if applicable): \_\_\_\_\_

Email address for service: \_\_\_\_\_

Postal address: \_\_\_\_\_

Phone number(s): \_\_\_\_\_

## REASON FOR FURTHER SUBMISSION(select appropriate)

- I/we represent a relevant aspect of the public interest; or
- I/we have an interest in the proposal that is greater than the interest of the general public; or
- I/we represent the Waikato Regional Council

Please specify the grounds for your selection above:

## APPEARANCE AT A HEARING

- I wish to be heard in support of my submission; or,       I do not wish to be heard in support of my submission.
- If others make a similar submission, I will consider presenting a joint case with them at a hearing.

## SIGNATURE

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

## MAILING DETAILS

Mailed to: Chief Executive, 160 Ward Street, Private Bag 3038, Waikato Mail Centre, Hamilton 3240

Delivered to: Waikato Regional Council, 160 Ward Street, Hamilton

Emailed to: [strategicandspatialplanning@waikatoregion.govt.nz](mailto:strategicandspatialplanning@waikatoregion.govt.nz) (*Submissions received by email must contain full contact details*)

**PLEASE CHECK** that you have provided all of the information requested and if you are having trouble filling out this form, phone Waikato Regional Council on 0800 800 401 for help.

Please use the attached table to make your submission to indicate the parts of Proposed Change 1 your submission relates to and the relief sought.

**Personal information is used for the administration of the further submission process and will be made public.** All information collected will be held by Waikato Regional Council, with submitters having the right to access and correct personal information.

FORM 6 Clause 8 of First Schedule, Resource Management Act 1991

**FURTHER SUBMISSION TO PROPOSED WAIKATO REGIONAL POLICY STATEMENT CHANGE 1:  
NATIONAL POLICY STATEMENT ON URBAN DEVELOPMENT 2020 AND FUTURE PROOF STRATEGY UPDATE**

<b>Submitter</b> <i>State the submitter number and submitter name of the original submission you support or oppose</i> <i>E.g., Submitter 123</i>	<b>Submission point</b> <i>State the number of the submission point from the original submission you support or oppose</i> <i>E.g., 123.1</i>	<b>Do you support or oppose the submission point?</b> <i>E.g., Support</i>	<b>Further submission</b> <i>State the reason for your support or opposition to the submission point</i> <i>E.g., I support this submission point because</i>	<b>Decision sought</b> <i>State clearly whether you seek that the submission point be allowed or disallowed</i> <i>E.g., Allow</i>

## ANNEXURE D

**Submitter contact details – Waikato Regional Policy Statement Proposed Change 1 – National Policy Statement on Urban Development 2020 and Future Proof Strategy Update**

Submitter number	First name	Last name	Organisation	Agent name (if relevant)	Email address	Street address	Suburb	Town	Postcode
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2	Sarah	Cameron	Horticulture New Zealand (HortNZ)		sarah.cameron@hortnz.co.nz	Level 4 Kiwi Wealth House, 20 Ballance Street		Wellington	6011
3	Brian	Croad	Tainui Group Holdings Limited	Peter Hall, Peter Hall Planning Limited	peter@phplanning.co.nz	Level 3, 43 High Street	Auckland Central	Auckland	1010
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6	Leslie	Vyfhuis	Thames-Coromandel District Council		leslie.vyfhuis@tcdc.govt.nz	515 Mackay Street		Thames	3500
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9	Tony	McLauchlan	Ohinewai Lands Limited	Ben Inger, Monocle	ben@monocle.net.nz	Panama Square, 14 Garden Place	Hamilton Central	Hamilton	3204
10	Tony	McLauchlan	Rangitahi Limited, Scenic Properties 2006 Limited and Raglan Land Company Limited	Ben Inger, Monocle	ben@monocle.net.nz	Panama Square, 14 Garden Place	Hamilton Central	Hamilton	3204

Submitter number	First name	Last name	Organisation	Agent name (if relevant)	Email address	Street address	Suburb	Town	Postcode
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23	Roderick	Aldridge			rod.aldrige1@gmail.com	33A Barrie Crescent	Silverdale	Hamilton	3216
24	Dr. Jim	Miller	Toi Te Ora Public Health		enquiries@toiteora.govt.nz	PO Box 2120		Tauranga	3140

Submitter number	First name	Last name	Organisation	Agent name (if relevant)	Email address	Street address	Suburb	Town	Postcode
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