

Contents

Appendices	1
1.0 Overview	1
1.1 National Policy Statement for Freshwater Management 2020	2
1.2 National Policy Statement on Urban Development 2020	15
1.3 National Policy Statement for Highly Productive Land 2022	31
1.4 National Policy Statement for Indigenous Biodiversity 2024	49
1.5 National Policy Statement for Infrastructure 2025	64
1.6 National Policy Statement for Natural Hazards 2025	82
2.0 Waikato Regional Policy Statement	89
3.0 Waikato Regional Plan	127
4.0 Waipa District Plan	152

Appendices

Refer to Volume 3 Industrial North AEE and supporting appendices.

1.0 Overview

The national direction instruments objectives and policies assessment has been completed for the Southern Links 1 – Industrial North portion of the substantive Fast-track application, including all key components of the Industrial North proposal such as industrial development, infrastructure, and open space. The assessment focuses on relevant national direction and, in particular, the applicable objectives and policies. Where full national direction instruments or specific objectives and policies have not been addressed, this reflects their lack of relevance to the proposal. Further detail, including broader commentary and assessment, is provided in **Volume 3** of the AEE.

1.1 National Policy Statement for Freshwater Management 2020

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Objective: The objective of this National Policy Statement is to ensure that natural and physical resources are managed in a way that prioritises: (a) first, the health and well-being of water bodies and freshwater ecosystems (b) second, the health needs of people (such as drinking water) (c) third, the ability of people and communities to provide for their social, economic, and cultural well-being, now and in the future.	The existing Industrial North Site is a highly modified environment comprising predominantly intensively managed pasture, existing industrial and fill areas, the Hamilton refuse transfer station and an artificial farm drainage network, including drains along the southern and eastern boundaries of the development area. The Ecological Impact Assessment (EclA) (refer to Industrial North EclA Appendix 23) identifies a high level of ecological disturbance across the Site, with minimal indigenous terrestrial vegetation and limited habitat value for indigenous lizards, birds and bats. The freshwater features within the Site are predominantly artificial watercourses of negligible to low ecological value, with shortfin eel the only fish species recorded, and no natural inland wetlands have been identified within the Industrial North Site (Ecological Assessment – Industrial North Appendix 23). Notwithstanding this modified existing environment, the proposal has been designed around a comprehensive and integrated freshwater, groundwater and stormwater management response that seeks to protect the health and well-being of freshwater and downstream receiving environments while enabling the Site to transition to a comprehensively planned industrial area. The Site falls immediately outside the draft Mangakootukutuku Integrated Catchment Management Plan (“ICMP”) area and ultimately discharges to the Waitawhiriwhiri West Stream. While an ICMP has not yet been prepared specifically for the Site's receiving catchment, its proximity to the Mangakootukutuku catchment has informed the proposed design response. Accordingly, the stormwater management strategy has adopted an approach generally consistent with the principles and performance expectations of the Mangakootukutuku ICMP. The Stormwater Management Plan (refer to

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	Industrial North - Appendix 14) applies a treatment-train and Water Sensitive Urban Design approach incorporating source control and initial abstraction, grass-lined swales, forebays, three constructed stormwater wetlands, extended detention and controlled discharge, together with on-lot measures such as soakage or rainwater harvesting, soakage trenches, rain gardens, swales and the use of appropriate roofing materials. Collectively, these measures are intended to manage both stormwater quality and quantity, maintain the hydraulic function of the wider drainage network and protect downstream receiving environments. In particular, the system is designed to provide water-quality treatment, retain or soak the initial abstraction volume, attenuate frequent rainfall events to pre-development discharge rates and attenuate the 100-year climate-change event to no more than 80% of the pre-development peak discharge. The proposed constructed wetlands will therefore perform both treatment and attenuation functions, while also introducing additional planted freshwater habitat and ecological structure within an environment that presently contains little freshwater habitat of significant ecological value. The EclA also identifies positive freshwater effects arising from the removal of stock access and stock-effluent inputs from the Site and the replacement of the existing rural drainage regime with a higher-quality, comprehensively designed stormwater management system. The proposal also addresses the potential interaction between groundwater and connected surface-water systems. The Hydrogeological Effects Assessment (refer to Industrial North – Appendix 20) concludes that groundwater effects associated with construction will be temporary and localised, while operational effects are expected to comprise minor localised redistribution of groundwater rather than any material reduction in

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	groundwater resources at a catchment scale. No measurable long-term change to the overall catchment water balance is anticipated. Potential effects associated with temporary dewatering, groundwater mounding and sediment mobilisation will be managed through standard construction methodologies, erosion and sediment controls and targeted monitoring. This provides further assurance that the freshwater management response considers the wider hydrological system rather than treating stormwater, surface water and groundwater as isolated components. The freshwater response has also been informed by tangata whenua values. Tangata whenua have been involved through the SL1 Tangata Whenua Working Group, and the Cultural Impact Assessment(refer to Industrial North – Appendix 24) has considered the technical stormwater, hydrogeological and ecological responses through the framework of Te Awa Koiora, Te Ture Whaimana o Te Awa o Waikato and the Waikato-Tainui Environmental Plan. The Cultural Impact Assessment identifies the integrated stormwater approach as providing opportunities to support the mauri of wai through improved water quality, reduced contaminant loads, more resilient catchment processes and ecological enhancement, while also providing for ongoing mana whenua involvement through detailed design, implementation and monitoring. Overall, the proposal responds appropriately to the hierarchy of obligations embodied in Te Mana o te Wai. First priority is given to the health and well-being of water bodies and freshwater ecosystems through the treatment-train approach, attenuation and flow management, ecological enhancement, removal of existing stock-related effects and protection of the receiving environment. The proposal also provides for the health needs of people through coordinated reticulated water and wastewater servicing. Subject to

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	those first two priorities, the development then enables the substantial social and economic benefits associated with approximately 60 ha of comprehensively planned industrial development, including employment, industrial land supply and associated regional economic benefits. Having regard to the highly modified condition of the existing environment, the comprehensive stormwater and groundwater management response, the anticipated freshwater and ecological improvements, and the incorporation of tangata whenua values and ongoing involvement, the proposal is considered consistent with the objective of the NPS-FM and the hierarchy of obligations expressed through Te Mana o te Wai.
Policy 1: Freshwater is managed in a way that gives effect to Te Mana o te Wai.	The proposal gives effect to Te Mana o te Wai through an integrated design response that places the protection of freshwater and receiving environments at the forefront of stormwater, earthworks and ecological management. The existing freshwater environment is highly modified and consists of artificial drains, but the proposal does not rely on that low existing value as a reason to avoid management. Instead, stormwater is managed through source controls, swales, treatment wetlands, extended detention and controlled discharge, with erosion and sediment controls during construction and fish-management measures where artificial drains are reclaimed (refer to the Stormwater Management Plan – Industrial North Appendix 14 and the Infrastructure Assessment – Industrial North Appendix 13). The Cultural Impact Assessment(refer to Industrial North – Appendix 24) has been prepared with the SL1 Tangata Whenua Working Group and specifically evaluates water, stormwater, freshwater ecology and hydrogeology through Te Awa Koiora and Te Ture Whaimana. It concludes that the stormwater approach supports the mauri of wai by improving water quality, reducing

Provision	Comment
	contaminant loads and supporting more natural hydrological processes, and recommends continued mana whenua involvement in catchment restoration, stormwater implementation and ecological management. Together, these measures demonstrate that the health and well-being of wai and freshwater ecosystems have informed the design and management of the development, rather than being treated solely as effects to be addressed after design. The proposal is therefore considered consistent with Policy 1.
Policy 2: Tangata whenua are actively involved in freshwater management (including decision making processes), and Māori freshwater values are identified and provided for.	Tangata whenua have been actively involved in the planning and assessment of SL1 through the SL1 Tangata Whenua Working Group, comprising representatives of Ngaati Wairere, Ngaati Maahanga, Ngaati Tamainupoo, Ngaati Hauaa, Ngaati Koroki-Kahukura and Ngaati Apakura, with the support of Waikato-Tainui as detailed in the Engagement and Consultation Report (refer to Industrial North – Planning Attachment 2). The Working Group has provided strategic cultural oversight, technical review and guidance across project planning, design development and the supporting technical assessments. The Cultural Impact Assessment(refer to Industrial North – Appendix 24) identifies the cultural relationships with wai, whenua, taonga species and the wider Waikato River system and has reconciled the stormwater, hydrogeological and ecological responses against Te Awa Koiora, Te Ture Whaimana and the Waikato-Tainui Environmental Plan. Its recommendations include continued mana whenua participation in stormwater implementation, freshwater habitat restoration, fish management, ecological monitoring and long-term adaptive management. The application therefore both identifies Māori freshwater values and provides an ongoing mechanism

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	for those values and mana whakahaere to continue informing implementation. The proposal is considered consistent with Policy 2.
Policy 3: Freshwater is managed in an integrated way that considers the effects of the use and development of land on a whole-of-catchment basis, including the effects on receiving environments.	The stormwater and freshwater response has been developed on a catchment basis rather than by considering individual industrial lots in isolation. The Site sits within the wider Waitawhiriwhiri drainage system and is traversed by artificial drains that connect with downstream Hamilton City drainage infrastructure and ultimately the wider Waikato River system. The Stormwater Management Plan (refer to Industrial North – Appendix 14) has been informed by the Draft Waitawhiriwhiri Integrated Catchment Management Plan, WRC guidance and RITS, and its hydraulic model extends through the Site to the downstream drainage network so that both upstream contributing flows and downstream effects are considered. The proposed treatment train combines on-lot retention/soakage, roadside swales, piped conveyance, constructed wetlands, attenuation and controlled outlets. Existing flow paths through the Site are maintained or deliberately re-provided, and each development stage is required to operate independently without relying on later stages for stormwater management. Modelling demonstrates reduced peak discharges relative to pre-development conditions across the assessed design events. The Hydrogeological Assessment (refer to Industrial North – Appendix 20) similarly considers the catchment water balance and concludes that the proposal will not materially alter the overall groundwater flow regime or cause a measurable long-term change in catchment water balance. The Cultural Impact Assessment (refer to Industrial North – Appendix 24) also emphasises the interconnected nature of the Waitaawhiriwhiri and Mangakootukutuku catchments and the need to understand tributaries and

Provision	Comment
	receiving environments as part of Te Awa o Waikato. Overall, the proposal manages the land-use change and its freshwater consequences in an integrated, receiving-environment and catchment-based manner and is consistent with Policy 3.
Policy 4: Freshwater is managed as part of New Zealand’s integrated response to climate change.	Climate change effects are expressly incorporated into the stormwater and flood-management design as set out in the Infrastructure Assessment (refer to Industrial North – Appendix 13). The Stormwater Management Plan (refer to Industrial North – Appendix 14) applies NIWA downscaled end-century SSP5-8.5/RCP8.5 rainfall projections and provides for the 10 year climate change event within the primary conveyance system and the 100-year climate-change event through safe overland flow paths and wetland attenuation. The design target for the 100-year climate change event is discharge at no more than 80% of the corresponding pre-development rate, providing additional downstream resilience rather than simply accommodating increased runoff within the Site. The development is also staged so that the stormwater infrastructure required to service each stage is delivered with that stage, while maintaining continuity of upstream and downstream flows. This provides a resilient and adaptable framework for managing future rainfall and flood conditions over the life of the industrial development. The proposal is therefore consistent with Policy 4.
Policy 5: Freshwater is managed (including through a National Objectives Framework) to ensure that the health and well-being of degraded water bodies and freshwater ecosystems is improved, and the health and well-being of all other water bodies and freshwater ecosystems is maintained and (if communities choose) improved.	The existing on-site freshwater environment is substantially modified. The EclA (refer to Industrial North – Appendix 23) describes the farm drains as artificial watercourses of negligible to low ecological value and identifies existing water quality pressures associated with catchment land use. The proposal will remove pastoral stock access and stock effluent inputs from the

Provision	Comment
	development area and introduce a comprehensive treatment train before runoff reaches the receiving drainage network. Compared to the existing highly modified environment, the proposed stormwater management strategy will provide improved treatment and attenuation of stormwater prior to discharge to the Waitawhiriwhiri catchment. The stormwater system is designed to provide source control, water quality treatment, extended detention and attenuation through swales, forebays and three constructed wetlands. This will materially improve the management of runoff from the Site compared with the existing pastoral and partly industrial environment. The EclA assesses post-management effects of stormwater discharge on catchment waterways as low, and identifies no significant residual ecological effects across the proposal. The Cultural Impact Assessment(refer to Industrial North – Appendix 24) likewise identifies the proposed stormwater and restoration measures as contributing to improved mauri and long-term catchment health. The proposal is therefore consistent with the direction to maintain and, where degraded, improve freshwater health and wellbeing.
Policy 6: There is no further loss of extent of natural inland wetlands, their values are protected, and their restoration is promoted.	The EclA (refer to Industrial North – Appendix 23) specifically investigated areas of potential wetland habitat using the applicable wetland delineation and pasture exclusion methodologies. It concludes that the potentially wet area within the Industrial North Site is a non-natural, highly modified pasture ecosystem and does not meet the definition of an RMA wetland or a 'natural inland wetland' under the NPS-FM. Accordingly, the proposal will not result in any loss of the extent or values of a natural inland wetland. Furthermore, the stormwater wetlands proposed as part of the development are constructed treatment and attenuation devices rather than existing

Provision	Comment
	natural inland wetlands. While their primary purpose is stormwater management, their planting and integration with the drainage network will provide additional wetland type habitat and ecological function within the developed landscape. The proposal is therefore consistent with Policy 6.
Policy 8: The significant values of outstanding water bodies are protected.	The protection and restoration of freshwater environments is summarised in the EclA (refer to Industrial North - Appendix 23). No outstanding water body is identified within the Industrial North Site. Nevertheless, the proposal has been assessed in the context of its downstream receiving environments and the wider Waikato River catchment. Stormwater will be treated and attenuated before controlled discharge, earthworks will be subject to erosion and sediment controls, and groundwater effects are assessed as temporary and localised, with no material long term reduction in catchment groundwater resources or substantial change to downstream hydrology (refer to the Stormwater Management Plan – Industrial North Appendix 14). The EclA (refer to Industrial North – Appendix 23) also identifies opportunities for ecological enhancement within the presently highly modified environment. The proposal will remove pastoral stock access and associated stock-effluent inputs and establish three constructed wetlands with associated indigenous planting. Together with wider restoration and enhancement planting, these measures will increase indigenous vegetation, improve habitat diversity and connectivity, and provide additional freshwater and terrestrial habitat relative to the existing artificial drainage environment. The Cultural Impact Assessment (refer to Industrial North – Appendix 24) recognises Te Awa o Waikato as the ultimate receiving environment and identifies the protection and restoration of connected waterways as

Provision	Comment
	contributing to the health and well-being of the River. Overall, the proposed stormwater treatment, ecological enhancement and removal of existing pastoral pressures will protect downstream freshwater values and contribute positively to catchment health. The proposal is therefore considered consistent with Policy 8.
Policy 9: The habitats of indigenous freshwater species are protected.	The on-site artificial drainage network is of negligible to low freshwater ecological value, but it does provide habitat for a small number of shortfin eels. Approximately 2.7 km of artificial watercourse will be reclaimed as part of the development, creating a potential direct risk to fish present during works as outlined in the EclA (refer to Industrial North – Appendix 23). The EclA therefore recommends a Fish Management Plan providing for fish capture and relocation prior to and during reclamation (refer to Industrial North – Appendix 23). With those measures, the residual effect on native freshwater fish is assessed as low. Protection is also provided at a broader habitat level. The proposed stormwater treatment system will reduce sediment and contaminant inputs to receiving watercourses, while constructed wetlands and associated planting will add freshwater habitat within the developed Site. The Cultural Impact Assessment(refer to Industrial North – Appendix 24) recognises tuna and other indigenous fish as taonga and recommends continued protection and enhancement of freshwater habitats, ecological connections and fish passage, together with mana whenua involvement in fish management and restoration. Considering the above, it is considered that the proposal protects indigenous freshwater species during construction and improves the quality and resilience of their receiving environment, and is considered consistent with Policy 9.

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Policy 11: Freshwater is allocated and used efficiently, all existing over-allocation is phased out, and future over-allocation is avoided.	No new direct take or allocation of groundwater or surface water for consumptive use is sought as part of the Industrial North application. Potable and firefighting water is proposed to be supplied through Hamilton City Council's reticulated network using a staged servicing strategy, with the infrastructure design providing minimum service pressures and firefighting supply appropriate to the industrial development. The Hydrogeological Assessment (refer to Industrial North – Appendix 20) confirms that temporary construction dewatering and long-term interaction with the proposed stormwater wetlands will not result in a material long-term reduction in catchment groundwater resources. Operational groundwater effects are characterised as localised redistribution within the Site catchment rather than a net loss. Detailed design will be undertaken through the Engineering Plan Approval process in accordance with HCC requirements. The proposal therefore does not contribute to freshwater over-allocation and is consistent with Policy 11.
Policy 12: The national target (as set out in Appendix 3) for water quality improvement is achieved.	The national target is to increase the proportion of specified rivers and lakes that are suitable for primary contact to at least 80% by 2030 and 90% no later than 2040, while also improving water quality across all categories. The proposal supports this broader direction by replacing the existing pastoral land use, including stock access and associated nutrient and effluent inputs to artificial drains, with an industrial development subject to a comprehensive stormwater management regime. As detailed in the Infrastructure Report (refer to Industrial North - Appendix 13) and Stormwater Management Plan (refer to Industrial North - Appendix 14), runoff will be managed through an integrated treatment train incorporating source controls, on-lot retention or soakage, grass-lined swales, forebays and constructed wetlands. The system

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	is designed to achieve a 75% total suspended solids removal target, together with extended detention of the water-quality volume, thereby improving the quality of stormwater discharged to the receiving environment compared with the existing situation. During construction, erosion and sediment controls will be implemented in accordance with WRC guidance and the project Earthworks and Construction Management Plan (refer to Industrial North – Appendix 31) to minimise sediment and contaminant discharges. The EclA (refer to Industrial North – 23) concludes that, with these controls and the permanent stormwater treatment system in place, effects on freshwater water quality and habitat will be low. Collectively, the removal of existing pastoral inputs, treatment of runoff and management of construction-related effects will protect receiving waters and contribute to the wider objective of improving freshwater quality. The proposal is therefore considered consistent with Policy 12.
Policy 13: The condition of water bodies and freshwater ecosystems is systematically monitored over time, and action is taken where freshwater is degraded, and to reverse deteriorating trends.	The proposal includes a suite of management, inspection and monitoring mechanisms proportionate to the nature and scale of the identified freshwater effects. During construction, erosion and sediment controls and environmental compliance inspections will be used to confirm that sediment and dewatering effects remain appropriately managed. The Hydrogeological Assessment (refer to Industrial North – Appendix 20) recommends targeted short-term groundwater monitoring during construction to confirm groundwater behaviour remains consistent with predictions and to support management of potential settlement effects. It concludes that permanent post-construction groundwater or surface water monitoring is not necessary from a hydrogeological perspective because predicted effects are localised,

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	temporary or minor and no substantial long-term change to downstream hydrology is expected. As the Stormwater Management Plan (refer to Industrial North – Appendix 14) confirms, long-term performance of stormwater infrastructure will also be secured through operation and maintenance requirements for public and private devices. The Cultural Impact Assessment(refer to Industrial North – Appendix 24) recommends that ecological restoration outcomes be reviewed over time and that mana whenua continue to participate in ecological restoration, implementation, monitoring and adaptive management. This provides an appropriate framework to identify any unexpected deterioration and respond through maintenance or adaptive management. The proposal is therefore consistent with Policy 13.
Policy 15: Communities are enabled to provide for their social, economic, and cultural wellbeing in a way that is consistent with this National Policy Statement.	The Industrial North development will provide approximately 60 ha of comprehensively planned industrial land adjoining Hamilton's existing industrial area, with a range of lot sizes, transport connections and three-waters infrastructure. It will materially increase industrial land supply and provide for future employment, business activity and associated economic benefits in a location identified for long-term urban growth. Those benefits are enabled within an environmental management framework that addresses freshwater health and cultural values through integrated stormwater treatment and attenuation, erosion and sediment controls, fish-management measures, groundwater assessment and monitoring, and ongoing mana whenua involvement. The Cultural Impact Assessment(refer to Industrial North – Appendix 24) also identifies opportunities for employment, procurement, capacity building and strengthened cultural identity as part of the wider SL1 programme. The proposal therefore enables social, economic

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	and cultural well-being without displacing the higher-order freshwater priorities of the NPS-FM and is considered consistent with Policy 15.

1.2 National Policy Statement on Urban Development 2020

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Objective 1: New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.	The proposed SL1 Industrial North development will make a significant contribution to a well-functioning urban environment by bringing forward a comprehensively planned and serviced employment precinct in a strategically identified growth location adjoining Hamilton. The Industrial Area forms part of the wider Southern Links Growth Cell and is contiguous with the established Frankton industrial area, with the North Island Main Trunk railway along its eastern edge and the designated Hamilton Southern Links corridor traversing the wider growth cell. This location enables employment growth to occur as a logical extension of an established industrial node and to be coordinated with existing and planned strategic transport and servicing infrastructure. In particular, the proposal will contribute to a well-functioning urban environment through: • Responding to identified industrial land demand: The Economic Assessment (refer to Industrial North – Appendix 29) identifies a strong need for additional industrial capacity. Hamilton's industrial vacancy was approximately 2.4% at the end of 2025, below the level generally associated with a balanced market, while approvals for new industrial supply across the region have reduced materially. The Future Proof Strategy also projects a long-term shortfall in industrial

capacity and identifies demand for approximately 856 ha of additional business-zoned land across the sub-region over the next 30 years.

- **Providing substantial additional industrial capacity and choice:** The proposal will enable approximately 41.9 ha of net developable land, including approximately 41.4 ha of industrial land, and approximately 168,000 m² of future industrial and associated floorspace. The 22 serviced lots will provide a range of sizes and configurations capable of accommodating different industrial, trade, service, warehousing, logistics and distribution activities. This will increase the diversity and resilience of Hamilton's industrial land supply and provide businesses with greater choice of well-located and serviced premises. The Economic Assessment (refer to **Industrial North – Appendix 29**) estimates approximately \$35 million in consumer-surplus benefits associated with this increased supply and choice.
- **Providing significant employment and economic benefits:** Once fully developed and occupied, onsite activity is estimated to sustain approximately 1,540 ongoing FTE jobs and generate approximately \$144 million per annum in wages and salaries. Over the 50-year assessment period, future onsite GDP has an estimated net present value of approximately \$2.18 billion. Construction of the development will also support significant employment, wages and economic activity during the development period.
- **Integrating land use and infrastructure:** The development is comprehensively masterplanned and supported by an integrated and staged infrastructure strategy covering transport, stormwater, wastewater, potable water and utilities. The Infrastructure

Assessment (refer to **Industrial North – Appendix 13**) confirms that infrastructure can be progressively delivered alongside development, with each stage capable of being appropriately serviced and operating independently. This provides for an efficient and coordinated pattern of urban growth rather than fragmented or unserviced industrial development.

- **Providing an accessible and connected employment location:** The proposed transport network provides for efficient industrial and freight movements, including connections to Higgins Road, Wickham Street and the future Southern Links corridor, while also incorporating footpaths and shared walking and cycling facilities that connect with the existing and planned active-mode network. The location of substantial employment capacity close to existing and planned residential communities within the wider growth area also supports a more efficient spatial relationship between homes and employment.
- **Providing for health, safety, resilience and environmental quality:** The development incorporates measures to manage potential effects on surrounding environments, including operational noise controls and an integrated stormwater system incorporating source controls, swales, constructed wetlands, attenuation and dedicated overland flow paths designed having regard to future climate conditions. Landscape and visual effects have been assessed as low adverse (less than minor), with landscape planting and blue-green infrastructure providing structure, amenity and integration as the precinct develops. The stormwater response will also improve the management and treatment of runoff compared with the existing pastoral and partly industrial environment.

	Overall, the proposal will deliver a substantial increase in development-ready industrial and employment capacity in an appropriate and strategically connected location. It responds directly to an identified shortage of industrial land while integrating land use, infrastructure, transport accessibility, environmental management, resilience and amenity considerations within a comprehensively planned development. The resulting employment opportunities, increased business choice and competition, strategic infrastructure integration and substantial economic benefits will contribute materially to the social and economic wellbeing, health and safety of the wider urban community. The proposal will therefore contribute to a well-functioning urban environment and is considered consistent with Objective 1.
Objective 2: Planning decisions improve housing affordability by supporting competitive land and development markets.	Although the Industrial Development does not itself provide housing, it directly supports the competitive land and development market outcome sought by Objective 2 by enabling a substantial new supply of industrial land in a market where the Economic Assessment (refer to Industrial North – Appendix 29) identifies insufficient capacity to meet projected demand over the next 10–30 years. Bringing comprehensively planned and serviced industrial land to market will increase contestability and place competitive pressure on other landowners to advance development, price land efficiently and bring alternative sites forward in a timely manner. The proposal is estimated to generate approximately \$35 million in consumer-surplus benefits through increased industrial floorspace supply, while distributing industrial capacity across multiple independent sites and owners will reduce the risk of constrained or concentrated supply and improve the responsiveness of the market to changing business demand. The proposal will also complement planned residential growth within the wider SL1 Growth Cell by providing employment opportunities close to future housing, supporting a more balanced urban form and reducing pressure for longer-distance commuting. Accordingly, the proposal will materially increase industrial land supply and choice

	and is considered consistent with the competitive land and development market outcomes sought by Objective 2.
Objective 4: New Zealand's urban environments, including their amenity values, develop and change over time in response to the diverse and changing needs of people, communities, and future generations.	Industrial uses already occupy the majority of the proposed development area, including the Hamilton Transfer Station, a large truck depot and businesses associated with the supply of building equipment and aggregates, with the Rogerson horse stables being the principal remaining non-industrial use. Accordingly, while the proposal will enable the comprehensive development and intensification of the Site for industrial purposes, it will not represent the same degree of change in character and amenity as the conversion of an entirely rural environment. Rather, it will consolidate and extend an established industrial character in a location adjoining the Frankton industrial area, the North Island Main Trunk railway and the designated Southern Links corridor, and within the wider SL1 Growth Cell identified for urban growth. This change is appropriate in the context of the Site's strategic growth role and the identified need for additional industrial and employment land within greater Hamilton. The Landscape and Visual Assessment (refer to Industrial North – Appendix 12) recognises that the introduction of additional industrial buildings, service yards, hardstand, roads and infrastructure will further reduce rural openness, particularly at the southern and western interfaces where the transition is more apparent. However, the receiving environment is already highly modified and of low landscape value, and wider views are generally contained or filtered by existing development, vegetation, rail infrastructure and the low-relief landform. Consequently, both landscape and visual effects are assessed as low adverse (less than minor). Planted stormwater reserves, wetland and pond margins, swales, street and frontage trees and specimen planting will also establish a coherent blue-green framework that will progressively soften and integrate the expanded industrial development and improve the quality of the Site's internal amenity.

	Potential amenity conflicts associated with the more intensive industrial use of the Site have also been specifically addressed. The Noise and Vibration Assessment (refer to Industrial North – Appendix 27) confirms that industrial activities can be located, designed and operated to achieve compatibility with adjacent industrial, rural and residential receivers. Recommended operational noise controls, including appropriate limits between industrial lots and restrictions on noise-sensitive activities within the precinct, will protect neighbouring amenity while avoiding reverse sensitivity effects that could constrain legitimate industrial activities. Overall, the proposal represents a planned consolidation and expansion of an existing industrial environment rather than a wholesale change from rural to urban character. To the extent that amenity values will change, that change is anticipated and appropriate for the Site's strategic role in meeting identified industrial land supply needs, with potential effects on adjoining environments appropriately managed through the masterplan, landscape treatment and operational controls. The proposal therefore recognises that urban environments and their amenity values develop and change over time in response to the diverse and changing needs of people, communities and future generations, and is considered consistent with Objective 4.
Objective 5: Planning decisions relating to urban environments, and FDSs, take into account the principles of the Treaty of Waitangi (Te Tiriti o Waitangi).	The proposal has been informed by ongoing tangata whenua involvement through the Southern Links 1 Tangata Whenua Working Group (SL1 TWWG), which comprises representatives of Ngaati Wairere, Ngaati Maahanga, Ngaati Tamainupoo, Ngaati Hauaa, Ngaati Koroki-Kahukura and Ngaati Apakura, with the support of Waikato-Tainui. The Working Group has provided strategic cultural oversight, technical review and guidance across the development of the wider SL1 programme, enabling cultural values and maatauranga Maaori to inform the project rather than being considered only at the end of the design process (refer to the

	Engagement and Consultation Summary Report – Industrial North Planning Attachment 2). The Cultural Impact Assessment(refer to Industrial North – Appendix 24) applies the Te Awa Koiora framework and considers the interconnected relationships between wai, whenua, taiao and tangata. Its recommendations address matters including water and stormwater management, ecological restoration, earthworks, contaminated land, taonga species, cultural monitoring, cultural identity and design, employment and procurement, and the continuing exercise of mana whakahaere. The assessment also identifies opportunities for cultural narratives, indigenous planting, cultural interpretation and naming of public features to be developed with the SL1 TWWG Hapuu as detailed design proceeds. The proposal provides for this relationship to continue through implementation, including cultural monitoring and ongoing participation in relevant design, environmental management and restoration processes. This approach recognises the enduring relationship of mana whenua with the Southern Links landscape and provides practical mechanisms for kaitiakitanga and mana whakahaere to continue throughout the life of the project. On this basis, the proposal appropriately takes into account the principles of Te Tiriti o Waitangi and is consistent with Objective 5.
Objective 8: New Zealand’s urban environments: (a) support reductions in greenhouse gas emissions; and (b) are resilient to the current and future effects of climate change.	The proposal supports a more efficient urban form by locating a substantial employment precinct immediately adjoining Hamilton's existing industrial area and adjacent to strategic freight and transport infrastructure. The Economic Assessment (refer to Industrial North – Appendix 29) notes that co-locating employment and planned housing within the same growth cell can reduce commuting distances and improve the balance of jobs and homes, while the site's proximity to the Southern Links corridor places land-intensive industrial, logistics and distribution activities where they can efficiently access the strategic road network.

	The internal transport network also provides alternatives to private vehicle travel. The design includes safe and direct walking and cycling routes along key public streets, including shared paths associated with the collector and Higgins Road connections, and provides for integration with the wider planned active-mode network. While the proposal is an industrial development with an inherent freight function, these measures support mode choice for employees and contribute to the longer term transition toward lower emissions travel. The development has also been specifically designed for climate resilience. The Stormwater Management Plan (refer to Industrial North – Appendix 14) applies climate change adjusted rainfall assumptions and an integrated treatment train comprising on-lot retention and/or soakage, swales, three constructed wetlands, controlled outlets and overland flow paths. The system attenuates the 2-year and 10 year events to pre-development rates and the 100 year climate change event to no more than 80% of pre-development discharge. Overland flow is safely routed through road corridors and the post-development modelling demonstrates reduced peak flows at the assessed locations. Together with engineered development platforms, staged infrastructure delivery and ongoing stormwater operation and maintenance requirements, these measures provide a robust response to existing floodplain conditions and future increases in rainfall intensity. The proposal is therefore consistent with Objective 8.
Policy 1: Planning decisions contribute to well-functioning urban environments, which are urban environments that, as a minimum: (a) have or enable a variety of homes that: i. meet the needs, in terms of type, price, and location, of different households; and ii. enable Māori to express their cultural traditions and norms; and (b) have or enable a variety of sites that are suitable for different business sectors in terms of location and site size; and	The proposal will make a substantial contribution to a well-functioning urban environment by providing a comprehensively planned and serviced industrial precinct in a strategically appropriate location adjoining the established Frankton industrial area. While Policy 1(a) is principally directed to housing and is not directly engaged by the Industrial Development itself, the proposal forms part of the wider SL1 Growth Cell alongside planned residential development and will provide a substantial employment base in proximity to existing and future housing. In relation

- (c) have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and
- (d) support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and
- (e) support reductions in greenhouse gas emissions; and
- (f) are resilient to the likely current and future effects of climate change.

to the matters directly relevant to the Industrial North Site, the proposal responds to Policy 1 as follows:

- **Business land diversity and location – Policy 1(b):** The proposal will provide approximately 41.4 ha of industrial land, enabling approximately 168,000 m² of future industrial and associated floorspace across 22 serviced lots. This represents a substantial addition to industrial capacity within greater Hamilton and responds directly to the identified long-term shortfall in industrial land supply detailed in the Economic Assessment (refer to **Industrial North – Appendix 29**). The lots provide a range of sizes and configurations capable of accommodating a broad spectrum of anticipated industrial activities, from smaller trade and service businesses through to larger warehousing, distribution and logistics activities. This will increase both the supply and choice of development ready industrial land. The Site is also contiguous with the established Frankton industrial area and strategically located in relation to the Hamilton Southern Links corridor and North Island Main Trunk railway, making it well suited to industrial, employment and freight-generating activities.
- **Accessibility – Policy 1(c):** The Site is well located in relation to existing and planned transport infrastructure, with connections to Higgins Road and Wickham Street and provision for future integration with the Hamilton Southern Links corridor and wider SL1 transport network. The internal street network has been designed to accommodate efficient freight and service movements while also incorporating footpaths and shared walking and cycling facilities, providing future employees with alternative transport choices. The provision of a significant employment precinct within the same wider growth

cell as planned residential development will also improve the spatial relationship between homes and employment opportunities.

- **Competitive land and development markets – Policy 1(d):** The proposal will materially increase the supply and choice of industrial land within a relatively constrained market. The Economic Assessment (refer to **Industrial North – Appendix 29**) identifies industrial vacancy of approximately 2.4% at the end of 2025, a moderated supply pipeline and a projected long-term shortfall in industrial capacity. Bringing a substantial, independently owned and comprehensively serviced industrial precinct to market will increase contestability and choice, place competitive pressure on land pricing and release rates, and improve the ability of the market to respond to business demand. The Economic Assessment estimates approximately \$35 million in consumer-surplus benefits associated with the increased supply of industrial floorspace. Once fully developed and occupied, the proposal is also estimated to sustain approximately 1,540 ongoing FTE jobs, providing a significant additional employment base for greater Hamilton.
- **Greenhouse gas emissions – Policy 1(e):** The proposal consolidates employment growth as a logical extension of an established industrial area and in close proximity to existing and planned strategic transport infrastructure, rather than establishing a fragmented or isolated industrial location. The internal transport network incorporates walking and cycling infrastructure, providing alternatives to private vehicle travel for future workers. The proximity of the employment precinct to existing and planned residential development within the wider SL1 Growth Cell also has the potential to reduce travel distances between homes and employment and support a more efficient urban form.
- **Climate resilience – Policy 1(f):** The development will be comprehensively serviced by an integrated package of transport, stormwater, wastewater, potable water and utility infrastructure, with infrastructure delivered

	progressively alongside each stage of development (refer to the Infrastructure Assessment and Stormwater Management Plan, Industrial North – Appendix 13 and 14). Stormwater and flood management infrastructure has been informed by pre and post development modelling incorporating climate change adjusted rainfall assumptions. The proposed system includes on-lot retention or soakage, swales, constructed wetlands, attenuation, controlled discharges and dedicated overland flow paths, including attenuation of the 100 year climate change event to no more than 80% of the pre-development discharge. This provides a resilient stormwater response while the staged servicing strategy ensures that each stage is appropriately serviced and capable of operating independently. Overall, the proposal will provide a diverse and substantial addition to greater Hamilton's industrial land supply in a strategically connected location, while increasing employment opportunities, improving business land choice and competition, integrating with existing and planned transport infrastructure, providing for alternative transport modes and incorporating a coordinated and climate-resilient infrastructure response. The proposal will therefore contribute materially to a well-functioning urban environment and is considered consistent with Policy 1.
Policy 2: Tier 1, 2, and 3 local authorities, at all times, provide at least sufficient development capacity to meet expected demand for housing and for business land over the short term, medium term, and long term.	Waipā District and Hamilton City are Tier 1 local authorities under the NPS-UD. Although the Industrial Area is located within Waipā District, it is contiguous with the Hamilton City boundary and will function as part of the wider Hamilton urban environment. The Site forms part of the wider Southern Links Growth Cell, which is identified in the Waikato Future Proof Strategy 2024–2054 as part of Hamilton's urban enablement area under the NPS-UD. The Future Proof Strategy identifies the Industrial Area for industrial development and recognises the Hamilton Southern Links corridor as critical enabling infrastructure. The proposal therefore provides an opportunity to realise planned industrial capacity in a location that has been

strategically identified for urban growth and is well positioned to contribute to Hamilton's immediate and longer-term industrial land requirements.

The need for additional industrial development capacity is well evidenced. In particular:

- There is an identified long-term need for additional business land. The Future Proof Strategy anticipates demand for approximately 856 ha of additional business-zoned land across the sub-region over the next 30 years and identifies a long-term industrial capacity shortfall in Hamilton.
- Current market conditions reinforce the need to bring additional capacity forward. The Economic Assessment (refer to **Industrial North – Appendix 29**) records industrial vacancy of approximately 2.4% at the end of 2025, together with strong demand for modern industrial premises and a material reduction in the recent industrial supply pipeline. It also concludes that potential capacity associated with other proposed developments should not be assumed to be certain or available within the required timeframe, and that multiple independent sources of industrial land supply support greater market competition and responsiveness.
- The proposal will deliver a substantial addition to industrial capacity. Approximately 41.4 ha of industrial land will be provided, enabling around 168,000 m² of future industrial and associated floorspace. A range of lot sizes and configurations will accommodate different industrial activities and business requirements, materially increasing the supply and choice of development-ready industrial land available to the greater Hamilton market.

- The capacity will be comprehensively planned and capable of being serviced. The proposal is supported by an integrated and staged infrastructure strategy covering transport, stormwater, wastewater, potable water and utilities (refer to the Transport Assessment, Infrastructure Assessment and Stormwater Management Plan – **Industrial North Appendices 13, 14 and 16**). This is important in the context of Policy 2 because the proposal does not simply identify theoretical industrial capacity; it establishes the planning and infrastructure framework necessary to enable that capacity to be progressively realised.
- The location enables efficient integration with the wider urban environment. The development represents a logical extension of the established Frankton industrial area and is strategically located in relation to the North Island Main Trunk railway and existing and planned strategic transport infrastructure, including the Hamilton Southern Links corridor. The proposed transport and servicing networks will also support the staged development and longer-term integration of the wider Southern Links Growth Cell.

Overall, the proposal will convert strategically identified industrial growth capacity into a substantial supply of comprehensively planned, serviceable and development-ready industrial land. In doing so, it will directly respond to the identified industrial capacity shortfall, improve the range and choice of industrial land available to the market, and support the future growth and functioning of the greater Hamilton urban environment. The proposal will therefore make a significant contribution to ensuring sufficient business development capacity is provided and realised to meet expected demand over the short, medium and long term and is considered consistent with Policy 2.

Policy 6: When making planning decisions that affect urban environments, decision-makers have particular regard to the following matters:

- (a) the planned urban built form anticipated by those RMA planning documents that have given effect to this National Policy Statement
- (b) that the planned urban built form in those RMA planning documents may involve significant changes to an area, and those changes:
 - i. may detract from amenity values appreciated by some people but improve amenity values appreciated by other people, communities, and future generations, including by providing increased and varied housing densities and types; and
 - ii. are not, of themselves, an adverse effect
- (c) the benefits of urban development that are consistent with well-functioning urban environments (as described in Policy 1)
- (d) any relevant contribution that will be made to meeting the requirements of this National Policy Statement to provide or realise development capacity
- (e) the likely current and future effects of climate change.

The proposal is consistent with the matters to which particular regard is required under Policy 6. It represents a comprehensively planned extension of Hamilton's established industrial area in a location identified for future urban growth, responds directly to an identified need for additional business development capacity, and appropriately manages the effects and benefits associated with urban change.

Planned urban form and the significance of change – Policy 6(a) and (b)

The proposal will result in the further urbanisation and intensification of the Site as a planned industrial precinct. While this represents a permanent change, the significance of that change is moderated by the existing environment and strategic context. Industrial activities already occupy a substantial part of the Site, which immediately adjoins the established Frankton industrial area and is strongly influenced by existing industrial development, the North Island Main Trunk railway and the designated Hamilton Southern Links corridor. The Site also forms part of the wider SL1 Growth Cell identified for urban expansion. The proposal therefore represents a logical consolidation and extension of an established industrial environment rather than an isolated or unanticipated urban development.

The change in character and amenity has been specifically considered and managed through the design. The Landscape and Visual Assessment (refer to **Industrial North – Appendix 12**) assesses the resulting landscape and visual effects as low adverse (less than minor). A comprehensive blue green and landscape framework comprising planted stormwater reserves, constructed wetlands and pond margins, swales, street and frontage trees, specimen planting and ecological enhancement will provide structure, visual relief and progressive integration of the development, including at interfaces with adjoining rural and future urban areas. The Noise and Vibration Assessment (refer to **Industrial North – Appendix 26**) also confirms that appropriate operational controls can maintain compatibility with surrounding rural, residential and industrial receivers, while restrictions on noise-sensitive activities

within the precinct will avoid reverse-sensitivity effects on legitimate industrial activities.

Benefits of urban development – Policy 6(c)

The proposal will deliver substantial benefits that contribute to a well-functioning urban environment. Approximately 41.4 ha of industrial land and 168,000 m² of future industrial and associated floorspace will be enabled in a strategically connected location adjoining the established Frankton industrial area. The subdivision provides a range of lot sizes and configurations capable of accommodating different industrial, trade, warehousing, distribution and logistics activities, increasing the diversity and choice of development-ready industrial land available to the market.

The development will also provide substantial and enduring employment and economic benefits. At full build-out, the Economic Assessment (refer to **Industrial North – Appendix 29**) estimates that onsite activity will sustain approximately 1,540 ongoing FTE jobs and around \$144 million per annum in wages and salaries, with future onsite GDP having an estimated net present value of approximately \$2.176 billion. Its location also supports agglomeration with the existing Frankton industrial base, makes efficient use of existing and planned strategic transport investment, and provides a significant employment base in proximity to planned residential growth within the wider SL1 Growth Cell.

Contribution to development capacity – Policy 6(d)

The proposal responds directly to evidence of a constrained industrial property market and a projected long-term shortfall in business land within greater Hamilton. The approximately 41.4 ha of industrial land will be comprehensively planned and serviced by an integrated package of transport, stormwater, wastewater, potable water and utility infrastructure, as detailed in the Infrastructure Report (refer to Industrial North - **Appendix 13**). This is significant because the proposal does not

simply identify theoretical capacity; it establishes the subdivision, infrastructure and servicing framework necessary to convert strategically identified industrial land into feasible and serviceable development capacity.

The transport network will connect with Higgins Road and Wickham Street, provide for integration with the future Hamilton Southern Links corridor and enable future connections with the wider Southern Links Growth Cell. Footpaths and shared walking and cycling facilities will also connect with the existing and planned active transport network, providing future employees with alternatives to private vehicle travel.

Climate change – Policy 6(e)

The likely current and future effects of climate change have been incorporated into the design of the development rather than deferred to subsequent stages. Climate change adjusted rainfall assumptions have informed flood and stormwater modelling, development levels, wetland sizing, attenuation requirements and the design of dedicated overland flow paths. The integrated stormwater system incorporates source controls, swales, constructed wetlands, attenuation and controlled discharge, with the 100 year climate change event attenuated to no more than 80% of the pre-development discharge. The road network also provides secondary flow conveyance during extreme rainfall events. These measures will contribute to the long-term resilience of both the development and the downstream receiving environment.

Overall, the proposal represents a logical and comprehensively planned expansion of an existing industrial environment in a location already identified for urban growth and strategic infrastructure investment. It provides substantial additional business development capacity and significant employment and economic benefits, while appropriately managing the landscape, amenity and infrastructure

	consequences of urban change and incorporating a robust response to future climate conditions. The proposal is therefore considered consistent with Policy 6.
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1.3 National Policy Statement for Highly Productive Land 2022

Provision	Comment
Objective: Highly productive land is protected for use in land-based primary production, both now and for future generations.	The SL1 Industrial North site is located immediately adjacent to Hamilton’s existing urban boundary and established industrial areas, and forms part of a wider SL1 Growth Cell, a circa 440ha area that is earmarked for future urbanisation. The proposal provides for a comprehensively planned industrial development comprising 22 industrial lots and infrastructure. The application has taken a conservative approach to the NPS-HPL. The Soil and Land Use Capability Assessment (refer to Industrial North – Appendix 28) records that the Strategic Land Agreement between Hamilton City Council and Waipā District Council was entered into on 3 October 2022, before the NPS-HPL commenced, and identified the wider SL1 Growth Cell as land intended to transfer to Hamilton City for future urban development. Without relying on that, the assessment below has been carried out on the conservative basis adopted by Landsystems that the 55.3 ha Industrial Site is treated as highly productive land under the interim definition in clause 3.5(7). On that basis, the proposal will permanently convert land presently treated as highly productive land to industrial use and therefore has some inconsistency with the Objective of the NPS-HPL. However, the significance of that tension needs to be considered in the context of the actual productive characteristics, current condition, fragmentation and long-term function of this particular site, rather than the regional-scale LUC classification in isolation. In particular:

Provision	Comment
	• The site-specific soil assessment materially qualifies the regional-scale mapping. Although the 1:50,000 NZLRI mapping identifies the Industrial Site as LUC 2s5, detailed on-site assessment identifies approximately 16.3 ha (29%) as LUC Class 2, 12.5 ha (23%) as LUC Class 3, 0.3 ha (1%) as LUC Class 4, 8.5 ha (15%) as modified Anthropic soils classified LUC Class 7, and 17.6 ha (32%) as non-productive land. Accordingly, approximately 47% of the assessed Site is either non-productive or subject to severe soil limitations. • The productive land that remains is materially constrained. The approximately 29.1 ha of realistically productive land comprises peat and other Organic soils affected by poor to very poor drainage, seasonally high water tables and, in places, persistent ponding or inundation. The LUC 2 land is predominantly suitable for pastoral use and potentially seasonal cropping during drier periods, while the LUC 3 and 4 areas are subject to progressively greater wetness limitations. Any intensification of drainage would also need to be balanced against the risk of irreversible peat subsidence through oxidation and consolidation. • The Site does not function as a large, cohesive or versatile productive landholding. The Hamilton Southern Links designation bisects the remaining productive land into two disconnected blocks of approximately 13.0 ha and 16.1 ha. The Site is also divided across multiple titles and is bounded or strongly influenced by existing urban and industrial development, the North Island Main Trunk railway and strategic transport infrastructure. The Soil and LUC Assessment concludes that, together with the authorised bulk

Provision	Comment
	earthworks, these factors prevent the productive land from operating as a single conventional stand-alone dairy unit. • The Site has already been substantially modified and committed to non-rural activity. Existing industrial and associated activities occupy a significant proportion of the Site, and bulk earthworks consents LU/0263/10 and LU/0279/22 have been given effect to and together authorise extensive earthworks across most of the Industrial Site. The detailed soil assessment (refer to Industrial North – Appendix 28) also identifies 17.6 ha of non-productive land and 8.5 ha of truncated/fill Anthropic soils, with some of these modified areas not having been in productive use since at least 2008. • The Site is strategically located for urban industrial development. It sits immediately adjoining Hamilton’s existing urban boundary and established Frankton industrial area and forms part of the wider approximately 440 ha SL1 Growth Cell identified for future urbanisation. The proposal provides a comprehensively planned industrial precinct comprising 22 industrial lots and associated infrastructure, consolidating urban growth within an identified strategic growth area rather than creating dispersed rural-industrial development elsewhere. • The proposal responds to an identified industrial capacity shortfall. The Economic Assessment (refer to Industrial North – Appendix 29) identifies a need for additional industrial land within Hamilton and the wider Waikato sub-region. The proposal will enable approximately 42 ha of net developable industrial land and about 168,000 m² of industrial floorspace in a location capable of being efficiently serviced and integrated with the existing Frankton

Provision	Comment
	industrial area and the Hamilton Southern Links strategic transport corridor. • The opportunity cost of foregone rural production is comparatively small and has been expressly quantified. The Economic Assessment (refer to Industrial North – Appendix 29) adopts a deliberately conservative counterfactual of continued dairy farming across approximately 50 ha for 50 years, notwithstanding the smaller productive area identified through the detailed soil mapping and the future severance associated with Southern Links. Even on that basis, foregone rural production is estimated at approximately \$5 million NPV of GDP over 50 years, with a further approximately \$2 million attributed to indirect ecosystem-service value. • The economic benefits of conversion are substantial. At full operation, the proposal is estimated to support approximately 1,537 direct and indirect FTEs, generate around \$296 million of GDP per annum and approximately \$144 million in annual wages and salaries. The overall Total Economic Value assessment identifies approximately \$2.408 billion of net benefits over the 50-year assessment horizon, after accounting for foregone rural production, ecosystem service and option/bequest values. The Waipā Operative District Plan context also reinforces the distinction between the interim NPS-HPL classification and the actual productive characteristics of the Site. The detailed LUC assessment records that none of the Site qualifies as “High Class Soil” under the Waipā District Plan definition, principally because the relevant LUC 1 and 2 definition excludes peat soils and the other specified high-class soil categories are not present. While that does not displace the transitional NPS-HPL

Provision	Comment
	definition, it is relevant context when considering the actual versatility and productive quality of the land. Accordingly, the proposal cannot be described as fully consistent with the NPS-HPL Objective in isolation because it will result in the permanent conversion of land currently treated as highly productive land. However, the conflict is materially moderated by the Site’s constrained and fragmented productive capability, extensive prior modification, strategic urban-industrial location, existing and consented non-rural activities, and the comparatively modest productive opportunity cost of conversion. The proposal also avoids placing industrial development elsewhere on larger, more contiguous and versatile rural landholdings and instead consolidates growth within a location already identified for future urbanisation and strategic infrastructure investment. The operative pathways and exceptions within the NPS-HPL, including clause 3.10 in relation to subdivision, are addressed separately. Read in that broader context, the site-specific evidence materially reduces the weight of the productive-land conflict and supports the conclusion that conversion of this particular Site is justified in the circumstances of the proposal.
Policy 1: Highly productive land is recognised as a resource with finite characteristics and long term values for land-based primary production.	The Land Use Capability Assessment (refer to Industrial North - Appendix 28) expressly recognises the finite characteristics and long-term productive value of highly productive land and adopts a conservative approach to the application of the NPS-HPL. It records that the SL1 Strategic Boundary Agreement was entered into in October 2022, prior to commencement of the NPS-HPL, and that whether the Industrial Site was therefore already “identified for future urban development” for the purposes of clause 3.5(7)(b)(i) is a planning matter outside the scope of the soil assessment. Without relying on that threshold issue, the assessment proceeds on the basis that the whole 55.3 ha Industrial Site is treated as highly productive land

Provision	Comment
	under the interim clause 3.5(7) definition, based on the regional-scale NZLRI mapping of LUC 2s5. Importantly, Policy 1 does not require the actual characteristics and productive function of that land to be ignored. The site specific assessment demonstrates that the regional mapping materially overstates both the extent and versatility of land realistically available for production. Detailed on-site mapping identifies approximately 16.3 ha (29%) as LUC Class 2, 12.5 ha (23%) as LUC Class 3 and 0.3 ha (1%) as LUC Class 4, while 8.5 ha (15%) comprises modified Anthropogenic soils classified as LUC 7 and 17.6 ha (32%) is non-productive land. In practical terms, only approximately 29.1 ha, or 53% of the Site, is presently productive LUC 2-4 land, while 26.1 ha, or 47%, is either non-productive or severely modified. The productive component of the Site is also subject to material physical and operational constraints. The soils are predominantly peat or peaty loams affected by poor to very poor drainage, seasonally high water tables and, in places, persistent ponding or inundation. The LUC 7 areas are characterised by truncated and fill soils with shallow or absent developed topsoil and severe limitations. The long-term productive value of the Site is further constrained by the Hamilton Southern Links designation, which bisects the remaining productive land into two disconnected blocks of approximately 13.0 ha and 16.1 ha, and by the Site's location adjoining established urban and industrial development and the North Island Main Trunk railway. The existing and consented land use environment is also relevant. Significant bulk earthworks have already been authorised and given effect to across much of the Industrial Site, including resource consent LU/0263/10 for approximately 517,000 m³ of bulk earthworks and LU/0279/22 for approximately 101,900 m³. The Site is already substantially modified by existing industrial activities, artificial drainage, historical fill and previous earthworks, and parts of the modified land have not been

Provision	Comment
	in productive use for many years. These factors materially affect the Site's current and future productive function and distinguish it from a large, intact and highly versatile rural land resource. Notwithstanding those constraints, the application has not assumed that the rural productive value of the Site is negligible. The Economic Assessment (refer to Industrial North – Appendix 29) expressly values the opportunity cost of continued dairy production over a 50-year period, thereby recognising the long-term value of the remaining productive land rather than discounting it altogether. Accordingly, while the proposal will permanently convert land that is presently treated as highly productive land under the transitional NPS-HPL provisions, the finite productive resource has been explicitly identified, assessed and accounted for. The Site is a significantly modified, physically constrained and fragmented landholding at the urban-industrial edge, rather than a large, cohesive and highly versatile productive block. In that context, and having regard to the detailed site-specific evidence and the separate assessment under the operative NPS-HPL pathways, including clause 3.10, the proposal is considered consistent with the evaluative intent of Policy 1, notwithstanding the permanent conversion of the remaining productive land.
Policy 2: The identification and management of highly productive land is undertaken in an integrated way that considers the interactions with freshwater management and urban development.	The proposal has been assessed in an integrated manner that directly addresses the three matters identified by Policy 2: productive land, freshwater management and urban development. • Productive land: the Soil and LUC Assessment provides both the statutory regional scale LUC position and a detailed property scale assessment of the site's actual soils, drainage, modification and productive potential. This allows the NPS-HPL to be applied

Provision	Comment
	conservatively while still informing the decision-maker about the true physical characteristics of the land. • Urban development: Industrial North is not an isolated rural-industrial incursion. It is contiguous with Hamilton's established Frankton industrial area, lies within the wider SL1 Growth Cell, and is bisected by the designated Southern Links corridor. The masterplan provides a coordinated industrial precinct with roading, walking and cycling connections, and three-waters infrastructure capable of staged delivery. • Freshwater management: the development integrates stormwater source controls, swales, forebays, constructed wetlands, detention and attenuation measures as part of the urban form. This allows the effects of increased imperviousness and urbanisation on downstream receiving environments to be addressed as part of the same comprehensive development rather than through piecemeal site-by-site conversion. The proposal therefore demonstrates the type of integrated consideration contemplated by Policy 2: the productive-land implications are identified transparently, while the relationship of that land with the site's freshwater constraints and its strategic urban-development function is assessed as a whole.
Policy 4: The use of highly productive land for land-based primary production is prioritised and supported.	Policy 4 seeks to prioritise the use of highly productive land for land-based primary production. As the proposal will permanently convert land presently treated as highly productive land under the transitional NPS-HPL provisions to industrial use, there is an inherent degree of tension with the policy. However, the significance of that tension is materially moderated by the site-specific evidence regarding the

Provision	Comment
	actual productive capability, versatility and practical ability of the land to support ongoing primary production. The Land Use Capability Assessment (refer to Industrial North - Appendix 28) identifies that only approximately 29.1 ha of the 55.3 ha Industrial Site comprises productive LUC 2–4 land, with the remaining approximately 26.1 ha being either non-productive or severely modified LUC 7 land. The productive soils are predominantly peat or peaty soils subject to poor to very poor drainage, seasonally high water tables and ponding, which materially constrain their versatility. While the LUC 2 land can support pastoral farming and potentially seasonal cropping during drier periods, the LUC 3 and 4 areas are subject to progressively greater wetness limitations. None of the Site also qualifies as “High Class Soil” under the Waipā Operative District Plan definition, including because the relevant LUC 2 soils are peat/Organic soils. The practical ability to prioritise the Site for efficient and sustainable long-term primary production is further constrained by its existing and consented land use context. The Site is already substantially modified by existing industrial activities, historical fill, artificial drainage and implemented bulk earthworks consents. It also adjoins the established Frankton industrial area and North Island Main Trunk railway, while the Hamilton Southern Links designation bisects the remaining productive land into two disconnected blocks of approximately 13.0 ha and 16.1 ha. The Soil and LUC Assessment concludes that these factors prevent the remaining productive land from functioning as a single conventional stand-alone dairy unit. Accordingly, while the proposal is not consistent with Policy 4 in the narrow sense of retaining and prioritising the affected land for land-based primary production, the extent of that policy conflict is materially reduced by the relatively limited area of genuinely productive land, its constrained versatility, fragmentation and wetness limitations, and the Site's extensive existing and consented modification and

Provision	Comment
	strategic urban-industrial context. These factors significantly limit the practicality and long-term value of retaining the Site for primary production. In this context, the proposal is considered to have a degree of tension with Policy 4, rather than being fundamentally contrary to its broader intent.
Policy 5: The urban rezoning of highly productive land is avoided, except as provided in this National Policy Statement.	Policy 5 is directed specifically to the rezoning of highly productive land for urban development. The substantive application does not seek to rezone the Industrial North Site under the Waipā District Plan; the underlying Rural zoning will remain and the proposal instead seeks approval for the industrial development through the Fast-track Approvals Act 2024. Accordingly, Policy 5 and the urban rezoning pathway in clause 3.6 are not directly engaged as the operative pathway for the proposal. Nevertheless, given that the Site is conservatively treated as highly productive land under the transitional NPS-HPL provisions and the proposal will enable its use for industrial development, the matters underpinning Policy 5 and clause 3.6 provide relevant context. Clause 3.6 contemplates urban rezoning of highly productive land where there is a need to provide sufficient development capacity, there are no other reasonably practicable and feasible options for providing that capacity, and the environmental, social, cultural and economic benefits of rezoning outweigh the long term costs associated with the loss of highly productive land for land based primary production. While those criteria are not determinative of this application, the proposal aligns with the underlying considerations in a number of respects: • Industrial land demand: The Economic Assessment (refer to Industrial North - Appendix 29) identifies a tight industrial property market and a projected long-term shortfall in industrial development capacity within greater Hamilton. Industrial vacancy was approximately 2.4% at the end of 2025 and the recent pipeline of

Provision	Comment
	additional industrial supply has reduced materially. The proposal responds directly to that identified need by providing approximately 41.4 ha of industrial land and around 168,000 m² of future industrial and associated floorspace. • Strategically appropriate location: The Site immediately adjoins the established Frankton industrial area and forms part of the wider Southern Links Growth Cell identified for future urban development. It is also closely associated with the Hamilton Southern Links corridor, the North Island Main Trunk railway and existing and planned infrastructure networks. The proposal therefore consolidates additional industrial capacity at an established urban-industrial edge where it can be efficiently serviced and integrated with strategic infrastructure, rather than dispersing industrial activities across unrelated rural locations. • Existing environment and productive characteristics: The Land Use Capability Assessment (refer to Industrial North - Appendix 28) identifies considerable variability in the actual productive capability of the Site, including peat soils, poor drainage, seasonal wetness and substantial areas of modified or non-productive land. The Site is also already substantially modified, with existing industrial activities occupying a significant proportion of the Site and further areas affected by historical fill, artificial drainage and implemented bulk earthworks consents. The Hamilton Southern Links designation further fragments the remaining productive land. These characteristics materially constrain the practicality and long-term value of retaining the entire Site for land-based primary production.

Provision	Comment
	• Long-term costs of conversion: The application has expressly considered the opportunity cost associated with the loss of rural production rather than assuming that the Site has no productive value. The Economic Assessment (refer to Industrial North – Appendix 29) adopts a conservative counterfactual of continued dairy farming across approximately 50 ha over a 50-year period and estimates approximately \$5 million NPV of foregone rural GDP, together with approximately \$2 million of ecosystem-service value and an additional allowance for option and bequest values within its Total Economic Value assessment. • Benefits of development: Against those costs, the proposal will provide substantial additional industrial capacity, employment and economic activity. At full operation, the development is estimated to support approximately 1,537 direct and indirect FTEs, around \$296 million of GDP per annum and approximately \$144 million in annual wages and salaries. The overall Total Economic Value assessment identifies approximately \$2.408 billion of net benefits over the 50-year assessment horizon, after accounting for the costs associated with foregone rural production, ecosystem services and option/bequest values. Overall, Policy 5 and clause 3.6 are not directly applicable because the proposal does not seek an urban rezoning. It would therefore be inappropriate to treat clause 3.6 as a statutory test that the substantive application must satisfy. Nevertheless, the proposal is broadly aligned with the considerations underpinning that urban development pathway. It responds to an identified need for additional industrial capacity; locates that capacity at a strategically appropriate and established urban-industrial edge; involves land with materially constrained and modified productive

Provision	Comment
	characteristics; and delivers substantial long-term social and economic benefits relative to the quantified opportunity cost of foregone primary production. The proposal is therefore considered not inconsistent with the intent of Policy 5, while the NPS-HPL provisions that directly regulate the proposed subdivision and use of the Site, including clause 3.10 and Policy 8, are addressed separately.
Policy 6: The rezoning and development of highly productive land as rural lifestyle is avoided, except as provided in this National Policy Statement.	Policy 6 does not apply to the proposal in any substantive sense because the application neither rezones nor develops the land for rural lifestyle purposes. It provides for a comprehensively planned industrial precinct adjoining an established industrial area. The proposal also avoids the particular fragmentation outcome that Policy 6 is directed at. Rather than creating a dispersed pattern of small rural-residential holdings across productive land, it consolidates urban industrial development within a strategically identified growth cell and provides an integrated road, servicing and stormwater structure. The proposal is therefore consistent with Policy 6.
Policy 7: The subdivision of highly productive land is avoided, except as provided in this National Policy Statement.	Policy 7 is directly relevant because the proposal includes subdivision to create industrial lots, roads, infrastructure and associated lots on land that is conservatively treated as highly productive land under the transitional NPS-HPL provisions. The application therefore relies on the subdivision pathway provided by clause 3.10, which is assessed separately in detail. Clause 3.10 provides a pathway for subdivision where, among other matters, highly productive land is subject to permanent or long-term constraints affecting the economic viability of land-based primary production and the subdivision appropriately manages effects including fragmentation, reverse sensitivity and the loss of productive capacity. The technical and economic evidence supporting that assessment should be considered collectively, rather than as a series of isolated site constraints.

Provision	Comment
	In this case, there are a combination of enduring physical, operational and locational constraints affecting the productive use of the Site: • Actual productive capability is materially lower than the regional-scale mapping suggests. While the interim NPS-HPL definition treats the 55.3 ha Industrial Site as highly productive land based on the regional-scale NZLRI mapping, the detailed Land Use Capability Assessment (refer to Industrial North – Appendix 28) identifies approximately 16.3 ha (29%) as LUC Class 2, 12.5 ha (23%) as LUC Class 3 and 0.3 ha (1%) as LUC Class 4. A further 8.5 ha (15%) comprises modified Anthropic soils classified as LUC Class 7 and approximately 17.6 ha (32%) is non-productive land. Accordingly, only approximately 29.1 ha (53%) comprises productive LUC 2–4 land, while approximately 26.1 ha (47%) is non-productive or severely modified land. While the site-specific assessment does not alter the interim application of the NPS-HPL, it provides important evidence as to the actual characteristics and productive capability of the resource. • The remaining productive land is subject to enduring physical limitations. The productive soils are predominantly peat or peaty soils affected by poor to very poor drainage, seasonally high groundwater and persistent ponding or inundation. These conditions constrain trafficability, stocking intensity and cropping versatility and largely limit the land to pastoral production and, in some areas, seasonal cropping during drier periods. Improving the drainage regime is not necessarily a practicable solution, as deeper artificial drainage of the Organic soils would itself increase the risk of irreversible peat oxidation, consolidation and subsidence. The Waipā

Provision	Comment
	Operative District Plan context is also relevant in understanding the nature of the resource, with none of the Site qualifying as “High Class Soil” under the District Plan definition, including because the relevant LUC 2 soils are peat/Organic soils. • The productive land is permanently and strategically fragmented. The Hamilton Southern Links designation bisects the remaining productive area into two disconnected blocks of approximately 13.0 ha and 16.1 ha. The Site is also divided across multiple titles and influenced by the adjoining established urban and industrial environment and the North Island Main Trunk railway. The Land Use Capability Assessment concludes that, together with existing and authorised earthworks, these constraints prevent the productive land from functioning as a single conventional stand-alone dairy unit. • The existing and consented environment further reduces the realistic productive base. The Site is already substantially modified by existing industrial activities, historical fill, artificial drainage and earthworks. Bulk earthworks consents covering most of the Industrial Site have been given effect to. The site-specific mapping identifies approximately 17.6 ha as non-productive land and a further 8.5 ha as modified LUC 7 soils, with the latter areas not having been in productive use since at least 2008. • Alternative mechanisms for maintaining a viable productive unit are materially constrained. The combination of the relatively small effective productive area, multiple titles and ownership, parcel configuration, Southern Links severance, wetness and drainage constraints, existing industrial activities and consented modifications limits the realistic value of alternative arrangements such as leasing,

Provision	Comment
	boundary adjustments or amalgamation for primary production. These are not simply temporary management issues but collectively constrain the ability to establish or maintain an economically viable and efficient long-term farming unit. • The economic opportunity cost of conversion is comparatively low, even under a deliberately conservative counterfactual. The Economic Assessment (refer to Industrial North – Appendix 29) assumes continued dairy farming across approximately 50 ha for 50 years, notwithstanding the smaller 29.1 ha area identified as realistically productive and the future severance associated with Southern Links. On that basis, the foregone rural activity is estimated at approximately \$5 million NPV of GDP and 72 FTE-years over 50 years. This confirms that the remaining productive use has been expressly recognised and valued rather than assumed to have no economic value. • The proposed subdivision is comprehensive and avoids creating further inefficient rural fragmentation. Rather than subdividing highly productive land into smaller rural or rural-residential holdings while retaining an expectation of primary production, the proposal establishes an integrated industrial precinct at Hamilton's existing industrial edge. The subdivision is comprehensively planned around coordinated transport, three-waters, stormwater and utility infrastructure and provides a clear long-term urban function for the Site. It therefore avoids creating a residual pattern of small and inefficient rural lots and avoids introducing rural-lifestyle activities that could generate additional reverse-sensitivity effects on adjoining productive land.

Provision	Comment
	The strategic context reinforces those conclusions. The Site immediately adjoins the established Frankton industrial area and forms part of the wider SL1 Growth Cell identified for future urbanisation. The proposed subdivision therefore represents a logical consolidation and expansion of Hamilton's existing industrial area in a location associated with existing and planned strategic infrastructure, rather than an isolated subdivision of a large, cohesive and versatile productive land resource. The Land Use Capability Assessment (refer to Industrial North – Appendix 28) consequently concludes that the proposal will have less than minor adverse effects on the productive capacity of land. Accordingly, subject to the separate clause 3.10 assessment demonstrating that the applicable statutory criteria are satisfied, the proposed subdivision falls within the circumstances for subdivision of highly productive land contemplated by Policy 7. The Site is affected by a combination of long-term physical, operational and strategic constraints on viable primary production, while the comprehensive form of subdivision appropriately addresses fragmentation, productive capacity and reverse-sensitivity considerations. On that basis, the proposal is considered consistent with Policy 7.
Policy 8: Highly productive land is protected from inappropriate use and development.	Policy 8 is relevant as the application enables industrial use and development on land that, on the conservative clause 3.5(7) approach, is treated as highly productive land. The assessment should therefore not rely solely on the site's strategic location or economic benefits to characterise the proposal as automatically consistent with Policy 8. The significance of the conflict is nevertheless materially reduced by the site-specific circumstances. Almost half of the assessed site (47%) is non-productive or severely modified LUC 7s land, while the remaining productive area is constrained by peat soils, poor to very poor drainage, high water tables and fragmentation. The

Provision	Comment
	productive land cannot operate as a single stand alone dairy unit once the Southern Links severance, existing/authorised earthworks and adjoining urban-industrial context are taken into account. The industrial use is also not a speculative or isolated encroachment into an otherwise intact rural production area. The site is contiguous with Frankton's industrial area, located within the SL1 Growth Cell and integrated with the Southern Links corridor and planned infrastructure. The Economic Assessment (refer to Industrial North – Appendix 29) identifies a demonstrable industrial land supply need and substantial regional benefits, while explicitly accounting for the long-term economic value of the foregone rural use. Accordingly, while the proposed industrial use will result in the conversion of land presently treated as HPL, the significance of that conversion is materially reduced by the Site's constrained productive capability, extensive modification, fragmentation and strategic location at Hamilton's established urban industrial edge. The proposal forms part of a comprehensively planned urban growth area and will deliver substantial regional economic and employment benefits, while the subdivision of the Site is addressed through the specific pathway provided by clause 3.10. In this context, the proposal is considered to broadly align with the intent of Policy 8, as the loss of productive capacity is limited and justified by the particular characteristics, constraints and strategic function of the Site.
Policy 9: Reverse sensitivity effects are managed so as not to constrain land-based primary production activities on highly productive land.	The proposal is unlikely to create material reverse sensitivity effects that would constrain land based primary production on adjoining rural land. Industrial activities are generally less sensitive than residential or rural lifestyle activities to the normal effects of farming, and the proposal does not introduce new dwellings or other rural-residential activities along the rural interface.

Provision	Comment
	The development is concentrated within a comprehensively planned industrial precinct at Hamilton's existing industrial edge, rather than inserting sensitive activities into a wider productive landscape. The site is already influenced by the North Island Main Trunk railway, established industrial activity and the Southern Links designation, which further differentiates the receiving environment from a predominantly rural production setting. The masterplan also provides defined road and infrastructure interfaces and landscape treatment at the rural edge. These measures provide spatial separation and a managed transition between industrial development and adjoining rural land. Importantly, the proposal does not depend on imposing new restrictions on lawful farming activities on neighbouring properties in order to manage its own amenity expectations. Overall, the proposal is not expected to constrain the continued operation of land-based primary production on surrounding land and is consistent with Policy 9.

1.4 National Policy Statement for Indigenous Biodiversity 2024

Provision	Comment
Objective The objective of this National Policy Statement is: (a) to maintain indigenous biodiversity across Aotearoa New Zealand so that there is at least no overall loss in indigenous biodiversity after the commencement date; and (b) to achieve this: i. through recognising the mana of tangata whenua as kaitiaki of indigenous biodiversity; and	The Industrial North Site is a highly modified rural-industrial environment. The EclA (Industrial North – Appendix 23) records that vegetation is dominated by exotic pasture, weeds and common exotic specimen trees of negligible botanical value. Bird habitat is assessed as low value, potential lizard habitat as moderate, and bat habitat as low to moderate. Long tailed bats (Threatened – Nationally Critical) were confirmed using the Site, although activity was low compared with other parts of southern Hamilton and the Site is not considered likely to be important bat habitat.

Barker & Associates

+64 375 0900 | admin@barker.co.nz | barker.co.nz

Kerikeri | Whangārei | Warkworth | Auckland | Hamilton | Cambridge | Tauranga | Havelock North | Wellington | Christchurch | Wānaka & Queenstown

Provision	Comment
ii. by recognising people and communities, including landowners, as stewards of indigenous biodiversity; and iii. by protecting and restoring indigenous biodiversity as necessary to achieve the overall maintenance of indigenous biodiversity; and iv. while providing for the social, economic, and cultural wellbeing of people and communities now and in the future.	Freshwater values are also limited. The drainage network comprises artificial farm drains of negligible ecological value, with only shortfin eel recorded during fish surveys. No RMA wetlands or natural inland wetlands were identified. Notwithstanding that modified context, the proposal has applied the effects management hierarchy and provides species specific management for the indigenous fauna values that are present or may be present. The Bird Management Plan avoids vegetation clearance during the principal breeding season where practicable and otherwise requires nest checks and setbacks; the Lizard Management Plan provides for pre-clearance capture, salvage, relocation and habitat enhancement; the Bat Management Plan applies DOC bat roost protocols and bat sensitive lighting; and the Fish Management Plan provides for staged capture, relocation and ecological supervision during drain reclamation. Following these measures, the EclA assesses ecological effects as very low to low and identifies no significant residual effects (refer to Industrial North – Appendix 23). The proposal also provides an opportunity to improve indigenous biodiversity within the Site over time through indigenous restoration and ecological planting associated with the stormwater and blue-green network. The Cultural Impact Assessment(refer to Industrial North – Appendix 24) recommends that restoration prioritise resilient indigenous ecosystems, use eco-sourced material where practicable, strengthen habitat connectivity, and be supported by long term ecological management, monitoring and adaptive management with ongoing SL1 Tangata Whenua Working Group involvement. Tangata whenua have been actively involved through the SL1 Tangata Whenua Working Group, comprising representatives of Ngaati Wairere, Ngaati Maahanga, Ngaati Tamainupoo, Ngaati Hauaa, Ngaati Koroki-Kahukura and Ngaati Apakura, with Waikato Tainui support. The Cultural Impact Assessmentexpressly frames indigenous biodiversity and taonga species through Te Awa Koiora, mauri and mana

Provision	Comment
	whakahaere and provides for continued mana whenua involvement in restoration, fauna management and monitoring. Accordingly, the proposal recognises mana whenua as kaitiaki while also enabling the substantial social and economic benefits of comprehensively planned industrial development. Overall, having regard to the low existing habitat quality across much of the Site, the targeted protection of higher-value fauna, the application of the effects management hierarchy, the proposed restoration and enhancement measures, and the ongoing role of tangata whenua, the proposal is considered to maintain indigenous biodiversity in the context of the Site and to be consistent with the Objective of the NPS-IB.
Policy 1: Indigenous biodiversity is managed in a way that gives effect to the decision making principles and takes into account the principles of the Treaty of Waitangi.	The proposal has been developed through an ongoing partnership approach with tangata whenua rather than ecological matters being considered solely as a technical exercise. The SL1 Tangata Whenua Working Group has provided strategic cultural oversight and technical input throughout the wider SL1 planning process, including in relation to ecological restoration, freshwater management, taonga species and long-term stewardship (refer to Industrial North Planning Attachment 2 – Engagement and Consultation Summary Report). The Cultural Impact Assessment (refer to Industrial North – Appendix 24) recognises the mana and responsibilities of the participating hapuu as kaitiaki and reconciles the ecological evidence with Te Awa Koiora, Te Ture Whaimana o Te Awa o Waikato and the Waikato Tainui Environmental Plan. It recommends continued tangata whenua involvement in ecological restoration planning, implementation, monitoring and adaptive management, as well as specific participation in fish, bat and other fauna management. Those recommendations provide a practical mechanism for maatauranga Maaori, tikanga and mana whakahaere to continue to

Provision	Comment
	inform implementation of the project. The proposal is therefore considered consistent with Policy 1.
Policy 2: Tangata whenua exercise kaitiakitanga for indigenous biodiversity in their rohe, including through: (a) managing indigenous biodiversity on their land; and (b) identifying and protecting indigenous species, populations and ecosystems that are taonga; and (c) actively participating in other decision-making about indigenous biodiversity.	The proposal is consistent with Policy 2 through the early and ongoing involvement of tangata whenua and the meaningful opportunities provided for mātauranga Māori and the role of tangata whenua as kaitiaki to inform the protection, restoration and management of indigenous biodiversity (refer to the Engagement Summary and Consultation Report – Industrial North Planning Attachment 2). Engagement through the SL1 Tangata Whenua Working Group (TWWG) has informed the development of the wider SL1 masterplan and the approach to ecological restoration, freshwater and stormwater management, landscape design and cultural values. This has been supported by the Cultural Impact Assessment (refer to Industrial North - Appendix 24), which recognises the relationships of tangata whenua with the whenua, wai and indigenous biodiversity and considers biodiversity and taonga species as components of an interconnected cultural landscape. In particular, freshwater fish, pekapeka, mokomoko and manu are considered through the Piko Taiao framework, providing a culturally informed basis for understanding and responding to ecological effects. These cultural and ecological considerations are reflected in the physical design and management of the proposal. Indigenous and riparian planting, ecological enhancement, constructed stormwater wetlands and habitat restoration will increase indigenous vegetation and habitat connectivity across the Site. These measures provide opportunities for mātauranga Māori to inform restoration outcomes and contribute to strengthening mauri, ecological connectivity and the long-term resilience of indigenous biodiversity. Importantly, tangata whenua involvement is intended to continue through implementation rather than ending at consenting. The Cultural Impact

Provision	Comment
	Assessment recommends ongoing consultation with the SL1 TWWG in implementing relevant ecological management measures, including the Fish and Bat Management Plans, together with opportunities for tangata whenua to observe or participate in fish salvage and relocation where practicable and to be involved where threatened or At Risk fish species are encountered. Continued participation is also anticipated through habitat restoration, ecological monitoring, adaptive management and cultural monitoring during relevant stages of earthworks and construction. Collectively, these measures provide meaningful and ongoing opportunities for tangata whenua to exercise kaitiakitanga, apply mātauranga Māori and participate in decisions affecting indigenous biodiversity within their rohe. The proposal is therefore considered consistent with Policy 2.
Policy 3: A precautionary approach is adopted when considering adverse effects on indigenous biodiversity.	The proposal adopts a precautionary approach to the management of potential effects on indigenous biodiversity. The ecological values of the site and potential effects of the development have been assessed in the EclA (refer to Industrial North - Appendix 23), with species-specific management measures provided through the Ecological Management Plans (refer to Industrial North - Appendix 23). In particular: • Long-tailed bats: Bat activity has been recorded within the site. Potential effects associated with vegetation clearance, lighting and disturbance will be managed through the Bat Management Plan (refer to Industrial North - Appendix 23), including pre-clearance assessment and appropriate lighting controls. • Lizards: While no indigenous lizards were detected during surveys, suitable habitat is present and copper skink presence has been

Provision	Comment
	conservatively assumed. The Lizard Management Plan (refer to Industrial North - Appendix 23) provides for pre-clearance surveys, salvage and relocation where required, and habitat enhancement. • Avifauna: Potential effects associated with vegetation clearance will be managed through the Bird Management Plan (refer to Industrial North - Appendix 23), including appropriate measures to avoid or manage effects on nesting indigenous birds. Overall, the proposal appropriately recognises uncertainty regarding the presence and use of habitat by indigenous fauna and applies species-specific management measures in response.
Policy 4: Indigenous biodiversity is managed to promote resilience to the effects of climate change.	The Site contains no identified SNA and is dominated by highly modified industrial land, intensively managed pasture and exotic vegetation. Nevertheless, the proposal recognises the value of strengthening ecological resilience as part of the transition to an urban industrial environment. Notwithstanding the absence of an SNA, the proposed blue-green and stormwater network provides opportunities for indigenous revegetation and habitat enhancement, while the Cultural Impact Assessment (refer to Industrial North – Appendix 24) specifically recommends restoration that prioritises resilient indigenous ecosystems, uses eco-sourced plant material where practicable, and strengthens habitat connectivity across the wider SL1 area. For pekapeka, indigenous restoration planting is recommended to provide long-term habitat opportunities and improve connectivity, supported by bat-sensitive lighting so that movement and foraging functions are not unnecessarily compromised by urbanisation.

Provision	Comment
	These measures will increase the diversity, connectivity and long-term robustness of habitat within a presently simplified landscape, improving the ability of indigenous biodiversity to respond to future environmental change. The proposal is therefore consistent with Policy 4.
Policy 5: Indigenous biodiversity is managed in an integrated way, within and across administrative boundaries.	The proposal adopts an integrated approach to indigenous biodiversity that considers terrestrial fauna, freshwater ecology, stormwater, drainage, landscape restoration and cultural values together rather than as isolated matters. The EclA and the Bird, Lizard, Bat and Fish Management Plans (refer to Industrial North – Appendix 23) provide a coordinated effects-management framework, while the stormwater and blue-green network provides the principal structure for ecological enhancement within the developed Site. This integrated approach also extends beyond the Site boundary. The Industrial North Site lies within Waipaa District but is contiguous with Hamilton City, and highly mobile species such as long-tailed bats use a landscape that extends across territorial boundaries. The Bat Management Plan has regard to wider Hamilton bat distribution information and Hamilton City bat management guidance, while the Fish Management Plan and Cultural Impact Assessment (refer to Industrial North – Appendix 24) address the wider receiving catchment and long-term resilience of indigenous fish populations. The SL1 TWWG likewise provides cultural oversight across the wider Southern Links landscape. The proposal is therefore consistent with the integrated, cross-boundary direction of Policy 5.
Policy 7: SNAs are protected by avoiding or managing adverse effects from new subdivision, use and development.	No Significant Natural Areas (SNAs) are identified within the Industrial North Site, as confirmed by the EclA (refer to Industrial North - Appendix 23). The nearest identified SNAs include Lake Rotoroa, Grove Park Kahikatea and the proposed Mangakootukutuku Gully South, all located approximately 1 km or more from the

Provision	Comment
	Site. Accordingly, the proposal does not involve development within an SNA and Policy 7 is not directly engaged. Nevertheless, the proposal recognises and appropriately manages indigenous biodiversity values within the Site and their potential connections with the wider ecological network. Detailed ecological investigations have identified the terrestrial and freshwater values present within what is otherwise a highly modified environment, including values associated with indigenous fauna and, in particular, the use of the wider landscape by highly mobile long-tailed bats (pekapeka). Potential effects on indigenous fauna will be managed through the Bat, Bird, Lizard and Fish Management Plans (refer to Industrial North - Appendix 23). These provide species specific measures including pre-clearance surveys and checks, ecological supervision, salvage and relocation where required, and habitat enhancement. For long tailed bats, this includes DOC compliant protocols for the management of potential roost trees and bat-sensitive lighting measures, particularly along the eastern and south-eastern boundaries of the Site, to minimise potential effects on bat movement, foraging and habitat connectivity. The proposal will also provide positive ecological outcomes through the establishment of indigenous and riparian planting, constructed stormwater wetlands and wider habitat restoration and enhancement. These measures will increase indigenous vegetation and habitat diversity within the Site and strengthen ecological connectivity through an environment currently dominated by industrial activities, pasture and other highly modified habitats. Potential indirect effects on biodiversity values beyond the development footprint will also be managed. The integrated stormwater system provides for treatment and attenuation of runoff, while erosion and sediment controls will manage construction-related effects on downstream receiving environments. Together with

Provision	Comment
	ecological planting and the species-specific management measures, these provisions will assist in protecting ecological values both within the Site and across the wider receiving environment. The EclA concludes that, following implementation of the proposed effects-management measures, the residual ecological effects of the development will be very low to low, with no significant residual effects. Accordingly, while Policy 7 is not directly engaged because no SNA is located within the Industrial North Site, the proposal appropriately recognises and manages potential effects on indigenous biodiversity and ecological connectivity and is therefore considered consistent with the protective intent of Policy 7.
Policy 8: The importance of maintaining indigenous biodiversity outside SNAs is recognised and provided for.	Policy 8 is directly relevant because, although no Significant Natural Areas (SNAs) are identified within the Industrial North Site, indigenous fauna use or may use habitats within this highly modified environment. The EclA (refer to Industrial North – Appendix 23) recognises the importance of maintaining indigenous biodiversity outside SNAs and assesses the terrestrial and freshwater biodiversity values present across the Site. The EclA identifies bird habitat as having low ecological value, potential lizard habitat as moderate, and freshwater fish values as low. Long tailed bats (pekapeka) are assessed as a very high value species due to their Threatened – Nationally Critical conservation status, although the habitat provided by the Site is assessed as low to moderate value and recorded bat activity is comparatively low. The Site is also considered significant under the WRPS on the basis of the presence of long tailed bats, notwithstanding the relatively low level of recorded activity. The artificial drainage network and modified terrestrial habitats also provide or potentially provide habitat for indigenous freshwater fish, birds and lizards.

Provision	Comment
	These indigenous biodiversity values have been expressly recognised in the design and management of the proposal. Effects on indigenous fauna will be managed through the Bat, Bird, Lizard and Fish Management Plans (refer to Industrial North – Appendix 23), which establish species-specific measures including: • management of vegetation clearance to protect nesting indigenous birds, including seasonal clearance controls and nest checks where required; • pre-clearance management, salvage and relocation of native skinks, together with habitat enhancement at the identified release site; • management of potential bat roost trees in accordance with DOC protocols, together with bat-sensitive operational lighting to minimise potential effects on bat movement, foraging and habitat connectivity; and • ecological supervision and the salvage and relocation of shortfin eel prior to the reclamation of approximately 2.7 km of artificial farm drains, together with measures to appropriately manage freshwater fauna during works. The proposal will also provide positive biodiversity outcomes through the establishment of indigenous and riparian planting, constructed stormwater wetlands and wider ecological restoration and habitat enhancement within the blue green network. These measures will increase indigenous vegetation and habitat diversity and improve ecological connectivity across a Site that is presently dominated by industrial activities, pasture, exotic vegetation and artificial drainage features. In this respect, the proposal does not simply manage the effects of development on existing biodiversity values, but provides an opportunity to

Provision	Comment
	establish more extensive and better-connected indigenous habitat than currently exists. Freshwater biodiversity values will similarly be managed through the combination of the Fish Management Plan, ecological supervision during drain reclamation, and the integrated stormwater treatment system. Importantly, the EclA confirms that no natural inland wetlands are present within the Industrial North Site, removing the uncertainty suggested in the earlier assessment as to the status of potential wetland areas. Overall, the proposal recognises that indigenous biodiversity outside SNAs remains important and provides a comprehensive package of avoidance, management, species protection and habitat enhancement measures. The EclA concludes that, following implementation of these measures, effects on indigenous biodiversity will be very low to low, with no significant residual effects. The proposal will also increase indigenous vegetation and provide opportunities to improve habitat quality and ecological connectivity relative to the existing highly modified environment. The proposal therefore appropriately provides for the maintenance of indigenous biodiversity outside SNAs and is considered consistent with Policy 8.
Policy 10: Activities that contribute to New Zealand’s social, economic, cultural, and environmental wellbeing are recognised and provided for as set out in this National Policy Statement.	The proposal is consistent with Policy 10 by recognising the contribution of indigenous biodiversity to the social, economic, cultural and environmental wellbeing of people and communities: • Social wellbeing: The proposal will provide substantial additional industrial capacity and employment opportunities within greater Hamilton. Once fully developed and occupied, the Economic Assessment (refer to Industrial North – Appendix 29) estimates approximately 1,540 ongoing FTE jobs.

Provision	Comment
	• Economic wellbeing: The proposal responds to an identified need for additional industrial capacity and will provide approximately 41.4 ha of industrial land, supporting business growth, employment and wider economic activity. • Cultural wellbeing: The proposal has been informed by ongoing engagement with tangata whenua through the SL1 Tangata Whenua Working Group and the Cultural Impact Assessment (refer to Industrial North – Appendix 23), including recognition of cultural relationships with whenua, wai and indigenous biodiversity and opportunities for kaitiakitanga. • Environmental wellbeing: The proposal incorporates measures to manage effects on indigenous biodiversity, including species-specific ecological management plans, indigenous and riparian planting, ecological enhancement associated with drainage corridors, and constructed stormwater wetlands. These measures are detailed in the EclA and associated Ecological Management Plans (refer to Industrial North – Appendix 23). Overall, the proposal enables industrial and economic development while recognising and providing for indigenous biodiversity and its contribution to community wellbeing. Subject to resolution of the ongoing assessment of potential wetlands, the proposal is considered consistent with Policy 10.
Policy 13: Restoration of indigenous biodiversity is promoted and provided for.	The proposal provides a meaningful opportunity for ecological restoration within a landscape that is presently dominated by industrial areas, intensively managed exotic pasture, weeds and artificial drainage. Restoration is proposed through indigenous planting and habitat enhancement associated with the stormwater and blue green network, together with species specific habitat enhancement where

Provision	Comment
	required, including enhancement of the lizard release site (refer to Industrial North – Appendix 23). The Cultural Impact Assessment(refer to Industrial North – Appendix 24) provides a more detailed long term restoration framework. It recommends that ecological restoration prioritise indigenous ecosystems that strengthen ecological resilience and function, utilise eco-sourced plant material where practicable, strengthen habitat connectivity across the wider SL1 area, and be supported by a long-term Ecological Management Plan prepared in consultation with the SL1 TWWG. For pekapeka, it specifically recommends indigenous restoration planting that strengthens connectivity and provides long-term habitat opportunities. These measures move beyond short-term construction mitigation and provide for progressive improvement in habitat quality and ecological function. The proposal is therefore consistent with Policy 13.
Policy 14: Increased indigenous vegetation cover is promoted in both urban and nonurban environments.	Existing vegetation across the Industrial North Site is predominately exotic. The EclA (refer to Industrial North – Appendix 23) identifies pasture, weeds and common exotic specimen trees as having negligible botanical value, with large areas of existing industrial and storage land containing little or no vegetation. The proposal will therefore occur in an environment with very limited existing indigenous vegetation cover. Within that context, the development provides opportunities to increase indigenous cover through restoration and ecological planting associated with the stormwater and blue-green network and through habitat enhancement measures. The Cultural Impact Assessment(refer to Industrial North – Appendix 24) recommends indigenous revegetation using eco-sourced plant material where practicable and restoration designed to strengthen ecological connectivity and long-term ecosystem resilience. This will increase the presence and function of

Provision	Comment
	indigenous vegetation within the future urban industrial environment relative to the existing baseline. The proposal is therefore consistent with Policy 14.
Policy 15: Areas outside SNAs that support specified highly mobile fauna are identified and managed to maintain their populations across their natural range, and information and awareness of highly mobile fauna is improved.	Policy 15 is directly relevant to long tailed bats (pekapeka), which are a specified highly mobile fauna species under the NPS-IB and have been confirmed through acoustic monitoring to use the Industrial North Site. The EclA (refer to Industrial North – Appendix 23) assesses long tailed bats as having very high species value due to their Threatened – Nationally Critical conservation status, while the habitat provided by the Site itself is assessed as having low to moderate ecological value. Two acoustic monitoring surveys were undertaken to understand the extent and nature of bat activity across the Site. These recorded a comparatively low level of activity, with the EclA (refer to Industrial North – Appendix 23) concluding that the Site is not likely to represent important bat habitat when compared with other parts of southern Hamilton. Nevertheless, long tailed bats have been confirmed to use the Site and the wider landscape, and potential roost trees, open pasture and vegetation within and around the Site may provide occasional roosting, foraging and commuting opportunities. The proposal has therefore adopted a precautionary approach to managing potential effects on this highly mobile species. A dedicated Bat Management Plan (refer to Industrial North – Appendix 23) provides the principal mechanism for managing those effects. Potential roost trees will be identified and managed in accordance with the Department of Conservation's Bat Roost Protocols, with clearance of potential roost trees restricted to the period between 1 October and 30 April and undertaken under the supervision of an appropriately qualified bat ecologist. Where a confirmed roost is identified, the tree will not be felled while occupied. These measures provide a precautionary framework for avoiding direct effects on roosting bats notwithstanding the relatively low level of activity recorded across the Site.

Provision	Comment
	Artificial lighting has also been specifically addressed because of its potential to affect bat foraging and movement through the wider landscape. Bat sensitive lighting measures include downward directed and appropriately baffled fittings, low mounting heights where practicable, warm-colour LEDs, time-limited security lighting and a maximum illuminance of 0.3 lux at relevant external Site boundaries. These measures will minimise unnecessary light spill into adjoining habitats and retain opportunities for bats to move through and use the wider landscape. The proposal also provides opportunities to improve the quality and connectivity of habitat over time. Indigenous restoration and ecological planting associated with the wider blue-green network will increase indigenous vegetation and strengthen habitat connections through what is currently a highly modified industrial and pastoral environment. The Cultural Impact Assessment(refer to Industrial North – Appendix 24) further recognises pekapeka as a taonga species and recommends restoration that supports habitat connectivity and long term habitat opportunities, together with continued involvement of the SL1 Tangata Whenua Working Group in implementation, monitoring and adaptive management. The ecological investigations undertaken for the proposal also contribute to the information base for long tailed bats by documenting their presence, relative level of activity, potential roost habitat and use of the Site within the wider Hamilton bat landscape. This information has directly informed the species specific management incorporated into the proposal and provides an appropriate basis for ongoing monitoring and management. While long tailed bats are the principal highly mobile fauna species relevant to Policy 15, the proposal also provides complementary management for other indigenous fauna. The Lizard, Bird and Fish Management Plans (refer to Industrial North – Appendix 23) provide for measures including pre-clearance checks, seasonal nesting controls, salvage and relocation and habitat enhancement. These

Provision	Comment
	measures contribute to the broader maintenance and enhancement of indigenous biodiversity and habitat connectivity across the Site. Overall, the proposal has taken a proactive and precautionary approach to long tailed bats notwithstanding the comparatively low level of activity recorded within the Site. Through DOC compliant roost management, bat-sensitive lighting, habitat restoration and connectivity, ongoing tangata whenua involvement and the improved ecological information obtained through project investigations, the proposal appropriately manages effects on long-tailed bats and supports their continued use of the wider landscape. The EclA assesses post-management effects on bats and bat habitat as low. The proposal is therefore considered consistent with Policy 15.

1.5 National Policy Statement for Infrastructure 2025

Objective / Policy	Comment
Objective (1) The objective of this National Policy Statement is to: (a) ensure the national, regional and local benefits of infrastructure are provided for; (b) enable infrastructure to support the social, economic and cultural wellbeing of people and communities and their health and safety; (c) enable infrastructure to support the development and change of urban and rural environments to meet the diverse and changing needs of present and future generations; (d) ensure infrastructure is well-functioning, resilient and compatible, as far as practicable, with other activities; and	The SL1 Industrial North proposal includes a comprehensive and integrated package of infrastructure required to enable the staged development of the approximately 60 ha Industrial North precinct. This includes the internal and connecting road network, stormwater conveyance, treatment and attenuation devices, wastewater reticulation and two pump stations, staged potable water supply, and underground power and telecommunications. The infrastructure strategy is detailed in the Infrastructure Report (refer to Industrial North - Appendix 13) and Stormwater Management Plan (refer to Industrial North - Appendix 14). The infrastructure has been planned as an enabling framework for both the Industrial North development and its integration with the wider Southern Links Growth Cell and

Objective / Policy	Comment
(e) ensure infrastructure is delivered in a timely and efficient manner while managing adverse effects from or on infrastructure.	Hamilton urban networks. The road network provides connections to Higgins Road, Wickham Street and the future Hamilton Southern Links corridor; wastewater servicing is staged and incorporates substantial on-site storage and off-peak discharge to manage known downstream constraints; water supply is staged through existing mains and, for later stages, a new bulk connection from Kahikatea Drive; and the stormwater system is designed as a gravity-based treatment train using source controls, swales, forebays and three constructed wetlands. • The infrastructure will provide local and regional benefits by enabling a substantial new supply of comprehensively planned industrial land adjoining the established Frankton industrial area and supporting future employment and business activity; • The staged servicing framework supports timely delivery, with each development stage designed to operate independently and to include the infrastructure necessary for that stage, reducing reliance on future stages before development can function safely and effectively; • Resilience is embedded into the design. Wastewater pump stations provide N+1 duty and enhanced emergency storage; stormwater modelling incorporates climate-change-adjusted rainfall and attenuates the 100-year climate-change event to no more than 80% of pre-development discharge; and road and infrastructure corridors incorporate ground improvement and preloading to respond to compressible peat soils; • The infrastructure is integrated with strategic networks rather than operating in isolation. In particular, the proposal coordinates with the Hamilton Southern Links corridor, existing Hamilton three-waters

Objective / Policy	Comment
	networks, future strategic wastewater upgrades, and power and telecommunications providers; and • Potential adverse effects associated with construction and operation are addressed through engineering design, erosion and sediment controls, stormwater treatment, landscape integration, network capacity management, management plans and proposed conditions. Overall, the proposal will deliver well-functioning, resilient and coordinated infrastructure in a manner that enables planned industrial growth, supports social and economic wellbeing and manages effects on existing networks and the environment. It is therefore considered consistent with the Objective of the NPS-I.
Policy 1: Providing for the benefits of infrastructure (1) Decision-makers must ensure that the national, regional or local benefits of infrastructure, relative to any localised adverse effects on the environment, are recognised and provided for. (2) Decision-makers must recognise that the benefits of infrastructure include: (a) providing for the social, cultural and economic wellbeing of present and future generations; (b) creating, supporting and enhancing well-functioning urban and rural environments; (c) supporting sufficient development capacity to meet demand for housing and business land; (d) providing services that are essential to support human life and the development, growth and functioning of districts, regions, New Zealand and the economy; (e) helping to protect and restore the natural environment;	The proposed infrastructure will deliver substantial local and regional benefits by enabling the coordinated development of SL1 Industrial North and supporting the wider Southern Links Growth Cell. It will service approximately 41.4 ha of industrial land and provide the roads, stormwater, wastewater, potable water, power and telecommunications infrastructure necessary to convert planned industrial capacity into land that is capable of being developed and occupied. In particular, the infrastructure package will: • Enable planned industrial growth and economic activity by supporting the development of the approximately 60 ha Industrial North site adjoining the established Frankton industrial area. The infrastructure will facilitate additional industrial development capacity, employment and business activity within the wider Hamilton urban environment. • Integrate with existing and planned strategic transport infrastructure. The proposed network connects with Higgins Road and Wickham Street and provides for arterial connectivity via the Kahikatea Drive

Objective / Policy	Comment
(f) supporting New Zealand's emissions reduction targets and mitigating the effects of climate change; and (g) reducing the risks from, and improving resilience to, natural hazards and climate change. (3) Decision-makers must recognise: (a) the significant risks to, and impacts on, public safety, the wellbeing of people and communities, and the environment that may occur when infrastructure services are compromised; and (b) that infrastructure networks can be both independent and interconnected.	extension and future Hamilton Southern Links corridor. Internal collector and local roads will provide for freight movement, walking and cycling facilities, and coordinated service corridors, improving connectivity within the wider Southern Links Growth Cell. • Support the coordinated delivery of wider strategic infrastructure. The Economic Assessment (refer to Industrial North – Appendix 29) identifies the development as providing a defined demand base that supports the delivery and sequencing of regionally significant infrastructure, including Hamilton Southern Links and future strategic wastewater infrastructure. In this respect, the proposal has benefits beyond the Industrial North site itself and contributes to the broader servicing and development framework for the SL1 Growth Cell. • Provide an integrated and resilient three-waters response. The servicing strategy recognises the interconnected nature of infrastructure networks. Wastewater storage and off-peak pumping are proposed to manage downstream network capacity constraints, staged water connections respond to existing network capacity and future bulk infrastructure, and the gravity based stormwater system provides source control, water quality treatment, attenuation, constructed wetlands and maintained drainage connectivity before controlled discharge to the wider network. Emergency redundancy within the wastewater system and climate-resilient stormwater design also reduce the risk of service disruption or overloading of individual infrastructure components. • Provide essential utility infrastructure through underground power and telecommunications and coordinated servicing within the road

Objective / Policy	Comment
	reserve, supporting the safe and efficient operation of future industrial activities. The infrastructure has been comprehensively planned and staged to integrate with existing and future networks, with each stage supported by the infrastructure necessary for it to operate effectively. This staged approach provides flexibility to respond to existing network capacity and planned strategic upgrades while avoiding premature or inefficient infrastructure investment. Any localised construction, landscape, ecological or amenity effects associated with the infrastructure will be managed through the specialist design response, management plans and proposed conditions and are proportionate to the scale and significance of the benefits provided. Overall, the proposal gives practical effect to Policy 1 by enabling substantial industrial development capacity and essential infrastructure services, supporting the coordinated delivery of strategic infrastructure within the wider Southern Links Growth Cell, and appropriately managing localised adverse effects. The infrastructure benefits are therefore significant at both the local and regional scale.
Policy 2: Operational need or functional need of infrastructure to be in particular locations and environments (1) Decision-makers must recognise that infrastructure may have an operational need or functional need to operate in, be located in, or traverse particular locations and environments. (2) Decision-makers must recognise that the operational need or functional need of infrastructure includes, but is not limited to, the need to: (a) provide services to people and communities in a timely, effective and efficient manner;	The location and form of the proposed infrastructure is directly influenced by the operational and functional requirements of Industrial North and the need to connect efficiently with existing and planned networks. The infrastructure cannot be considered independently of those networks or of the physical characteristics of the Site. The transport network must connect to Hamilton’s existing road system and the designated Hamilton Southern Links corridor. The proposed access framework therefore includes the upgrade of the Kahikatea Drive/Greenwood Street intersection, an approximately 520 m extension of Kahikatea Drive along the Southern

Objective / Policy	Comment
(b) operate effectively and efficiently as linear and/or interconnected infrastructure networks within and across district and regional boundaries; (c) access or connect to particular natural or physical resources, including other infrastructure; (d) be accessible so infrastructure activities can be undertaken effectively and efficiently; (e) locate where the services are required, including in areas at risk to natural hazards, whether the infrastructure has been spatially identified in advance; and (f) manage risks from natural hazards.	Links corridor, a new roundabout and an east-west collector road through the Industrial Area, with longer term connections to Higgins Road and Wickham Street. This location also enables the development to function as an extension of the established Frankton industrial area. Wastewater and potable water infrastructure similarly require connection to the existing Hamilton networks (refer to Industrial North – Appendix 13). The preferred wastewater arrangement uses two on-site pump stations and rising mains with discharge toward the Karen Crescent system, supported by significant on-site storage and off-peak pumping. Water supply is staged, using existing Higgins Road and Wickham Street mains for early stages and a future DN450 bulk main from Kahikatea Drive for later stages. These locations are driven by network availability, capacity and the need to provide safe and efficient services. • The stormwater system is necessarily located and configured in response to the Site’s low-lying topography, artificial drainage network, receiving catchment and floodplain setting. Three constructed wetlands, swales, pipes and overland flow routes maintain hydraulic connectivity while treating and attenuating runoff. • Infrastructure design responds to peat soils, shallow groundwater and settlement risk through ground improvement, preloading and appropriate formation levels. • Road, water, wastewater, stormwater, power and telecommunications are coordinated within common corridors where practicable to support efficient construction, operation and future maintenance.

Objective / Policy	Comment
	Accordingly, the proposal demonstrates clear operational and functional reasons for the location, alignment and staging of the proposed infrastructure and is consistent with Policy 2.
Policy 3: Considering spatial planning (1) Decision-makers must: (a) have regard to the extent to which the infrastructure has been identified within a strategic planning document, while recognising that not all infrastructure can be spatially identified in advance; and (b) consider relevant spatial plans and master plans prepared by the infrastructure provider and provided to the decision-maker.	The infrastructure proposed for Industrial North has been developed within a wider spatial and strategic growth context rather than as an isolated servicing response. The SL1 Growth Cell Concept Plan pack (refer to Industrial North – Appendix 6) sets out the intended relationship between land use, transport, wastewater, stormwater, water and other supporting infrastructure across the wider growth cell. While that Concept Plan is not itself embedded within a statutory strategic planning document, it provides a coordinated spatial framework for understanding how the individual SL1 projects and their infrastructure fit together. The wider strategic context is also reinforced by the South Hamilton-North Waipā spatial work and by the designated Hamilton Southern Links corridor. Industrial North is deliberately integrated with that corridor and with Hamilton’s existing urban infrastructure networks. The Infrastructure Report (refer to Industrial North – Appendix 13) identifies staged connections and upgrades that allow early development to proceed while maintaining compatibility with longer-term strategic infrastructure, including future wastewater and bulk water upgrades. • The Industrial North masterplan identifies the principal road hierarchy, strategic stormwater areas, wastewater pump-station locations and infrastructure connections in a coordinated manner. • The infrastructure strategy has been prepared with regard to existing Hamilton networks and planned strategic upgrades, rather than relying on standalone or uncoordinated systems.

Objective / Policy	Comment
	• The staged design preserves the ability for later infrastructure, including Southern Links-related connections, to be integrated as the wider growth cell develops. Overall, the proposal is consistent with Policy 3 because the infrastructure has been planned within a coherent wider growth cell framework and has been spatially coordinated with existing and planned strategic networks.
Policy 4: Enabling the efficient and timely operation and delivery of infrastructure activities (1) Decision-makers must: (a) enable the efficient and timely delivery of infrastructure activities; (b) enable cross-boundary infrastructure networks; (c) provide flexibility for infrastructure providers to use new or innovative technologies and methods to improve the delivery of infrastructure services and/or improve environmental outcomes; (d) enable opportunities to make more effective use of existing infrastructure; (e) consider opportunities for continuous improvement in service delivery and environmental outcomes when renewing or replacing resource consents; and (f) enable the upgrading of infrastructure where this will: (i) improve the resilience of infrastructure to the risks from natural hazards and effects of climate change; (ii) maintain or improve its level of infrastructure service, including to meet increasing demand; or (iii) improve environmental outcomes. (2) Decision-makers must:	The Industrial North infrastructure strategy has been structured to support the efficient and timely delivery of infrastructure, while integrating with existing networks and preserving clear pathways to longer-term strategic upgrades across the wider SL1 Growth Cell. As outlined in the SL1 Growth Cell Concept Plan pack (refer to Industrial North – Appendix 6), infrastructure planning for the wider growth area has been undertaken holistically, including transport, wastewater, stormwater, water supply and other supporting infrastructure that connects into the existing Hamilton urban environment. While the Concept Plan is not itself embedded in a statutory strategic planning document, the major components of the SL1 Growth Cell, including SL1 Residential South, SL1 Industrial North, SL1 Rogerson Block and SL1 Houchens, are being progressed through the FTAA and collectively establish a coordinated framework for the delivery of urban growth and supporting infrastructure. For Industrial North, development is staged so that each stage can operate independently with the infrastructure necessary to manage its own transport, stormwater, wastewater and water demands, while remaining consistent with the ultimate network strategy. This enables infrastructure to be delivered progressively alongside development rather than requiring all strategic infrastructure to be completed upfront. Key stormwater infrastructure will be established progressively, with interim construction measures replaced by permanent systems as development advances.

Objective / Policy	Comment
(a) recognise it is the role of the infrastructure provider to identify the preferred location for the infrastructure activity; and (b) have regard to existing information and assessments undertaken by the infrastructure provider, including, but not limited to, information prepared using the Better Business Cases methodology developed by The Treasury New Zealand, infrastructure strategies prepared under the Local Government Act 2002, or the Infrastructure Priorities Programme developed by New Zealand Infrastructure Commission Te Waihanga.	The proposal also makes effective use of existing infrastructure while providing for future network enhancement. Early water supply stages utilise the existing Higgins Road and Wickham Street networks, with later stages transitioning to a new bulk supply connection from Kahikatea Drive. Wastewater servicing incorporates enhanced on-site storage and off-peak pumping to manage known constraints in the existing Dinsdale network while retaining a pathway to participation in wider strategic upgrades. This approach allows existing network capacity to be used efficiently in the short term without compromising longer-term servicing outcomes. The transport strategy similarly provides for both interim and ultimate integration with the Hamilton Southern Links corridor. The Kahikatea Drive extension and proposed roundabouts enable early access to the development, while the ultimate transport network can be integrated with the future Road of National Significance. Detailed design of the Southern Links interface will be coordinated between the project transport engineers, NZTA and Hamilton City Council, supporting a cross-boundary and integrated approach to network delivery. Other infrastructure measures further support efficient and resilient delivery: • the stormwater system adopts a gravity based treatment train comprising on-lot retention or soakage, swales, forebays and constructed wetlands, avoiding reliance on stormwater pump stations and reducing operational complexity; • infrastructure corridors will be preloaded and pavement subgrades improved to respond to peat settlement and improve long term network reliability;

Objective / Policy	Comment
	• public assets will be vested progressively where appropriate, while privately owned stormwater devices will remain subject to defined operation and maintenance responsibilities; and • power and telecommunications will be coordinated with utility providers and installed underground within road reserves to efficiently service future industrial lots. • The wider strategic benefits are also significant. Private developer agreements and funding mechanisms are being pursued to front-load infrastructure where appropriate and support coordinated outcomes across the SL1 Growth Cell. Industrial North will also provide a defined development and demand base that can assist the sequencing and delivery of wider strategic infrastructure, including Hamilton Southern Links, future wastewater infrastructure, the Southern Wastewater Treatment Plant and the proposed southern water reservoir. Overall, the staged, adaptable and cross-boundary infrastructure strategy enables the timely development of Industrial North while making efficient use of existing networks and maintaining compatibility with future strategic infrastructure. It also supports the coordinated delivery of infrastructure across the wider SL1 Growth Cell and is therefore considered consistent with Policy 4.
Policy 5: Recognising and providing for infrastructure supporting activities (1) Decision-makers must recognise and provide for the role of infrastructure supporting activities, including by: (a) recognising the importance of infrastructure supporting activities to enable the benefits of infrastructure activities to be realised; (b) recognising the operational need or functional need of some infrastructure supporting activities, including supporting quarrying	The proposal includes a range of activities that are necessary to construct, operate and maintain the primary infrastructure network, including bulk earthworks, ground improvement and preloading, temporary and permanent drainage works, service corridors, pump-station reserves, stormwater forebays and wetlands, utility trenches, road formation and associated construction access and management activities.

Objective / Policy	Comment
activities to operate in, be located in, or traverse particular environments and locations; and (c) enabling the timely delivery of infrastructure supporting activities.	These supporting activities are integral to the infrastructure outcome rather than ancillary in a minor sense. For example, preloading and subgrade improvement are necessary to establish reliable road and infrastructure corridors over compressible peat; bulk earthworks establish serviceable industrial platforms and appropriate drainage grades; and temporary swales, bunds and conveyance routes maintain drainage during construction until the permanent stormwater system is completed. The supporting works are staged alongside the primary infrastructure so that each phase can be delivered safely and efficiently. Erosion and sediment controls are to be implemented in accordance with Waikato Regional Council guidance and the project Construction Management Plan. Utility installation is coordinated within road corridors to facilitate future access, maintenance and connection to individual industrial lots. Accordingly, the proposal appropriately recognises and provides for the supporting activities necessary to realise the benefits of the core infrastructure and is consistent with Policy 5.
Policy 6: Recognising and providing for Māori interests (1) Decision-makers must recognise and provide for Māori interests in relation to infrastructure activities and infrastructure supporting activities, including by: (a) taking into account the outcome of any engagement with tangata whenua on any relevant resource consent, notice of requirement, or request for a private plan change; (b) recognising the opportunities tangata whenua may have in developing and operating their own infrastructure at any scale or in partnership; and (c) local authorities:	The proposal has been informed by substantial and ongoing engagement with tangata whenua through the SL1 Tangata Whenua Working Group (TWWG), comprising representatives of Ngaati Wairere, Ngaati Maahanga, Ngaati Tamainupoo, Ngaati Hauaa, Ngaati Koroki-Kahukura and Ngaati Apakura, with support from Waikato-Tainui. The Cultural Impact Assessment(refer to Industrial North - Appendix 24) records that the TWWG has provided strategic cultural oversight, technical review and guidance throughout planning and assessment of the wider SL1 programme. This engagement has included the earlier municipal water-take process for the wider SL1 Growth Cell, which resulted in a project specific Memorandum of Understanding establishing a framework for ongoing cultural input and freshwater management. For

Objective / Policy	Comment
(i) providing opportunities for tangata whenua involvement where infrastructure and infrastructure supporting activities may affect a site of significance or issue of cultural significance to Māori; and (ii) operating in a way that is consistent with any relevant iwi participation legislation or Mana Whakahono ā Rohe.	the Stage 1 proposal, mātauranga Māori and cultural values have been integrated alongside technical assessments through the Te Awa Koiora framework, which treats wai, whenua, taiao and tangata as interconnected and provides a basis for considering infrastructure effects and opportunities holistically. • Tangata whenua input has informed stormwater and freshwater management, ecological restoration, landscape and cultural design, earthworks and archaeological management. • The Cultural Impact Assessment(refer to Industrial North – Appendix 24) recommends continued TWWG involvement through detailed design, construction, monitoring and adaptive management, including culturally informed accidental-discovery and archaeological management processes. • The proposal incorporates stormwater wetlands, indigenous planting and ecological restoration that respond to both technical requirements and cultural aspirations relating to mauri and the health of the receiving environment. • Ongoing engagement provides a mechanism for infrastructure design and implementation to continue responding to mana whenua values as detailed design progresses. Overall, Māori interests have been actively recognised and integrated into project planning and infrastructure design, with mechanisms for continued involvement through implementation. The proposal is therefore consistent with Policy 6.
Policy 7: Assessing and managing the effects of proposed infrastructure activities	All infrastructure required within the SL1 Industrial North site to service the proposed development has been appropriately designed and sized for the anticipated industrial activities. The proposed infrastructure includes roads, stormwater wetlands and

Objective / Policy	Comment
(1) When assessing and managing the effects of infrastructure activities, decision-makers must: (a) have regard to the extent to which adverse effects have been avoided, remedied or mitigated through the selection of the route, site or method of undertaking the work; (b) consider the technical and operational requirements and constraints of infrastructure activities; (c) take into account the extent to which the effects of the infrastructure activities are different in scale, intensity, duration and frequency from the effects of existing infrastructure; (d) take into account relevant international standards (that are recognised or used in New Zealand), national standards and recognised best practice standards and methodologies to assess and manage adverse effects; and (e) ensure that the mitigation measures and consent conditions are proportionate to the scale of adverse effects generated by the activity.	swales, wastewater reticulation and pump stations, water supply and utility infrastructure. The design and siting of above-ground infrastructure, together with the proposed landscaping strategy, will ensure potential visual and amenity effects are appropriately managed. In addition, the infrastructure strategy for SL1 Industrial North has been underpinned by connections to the existing Hamilton City infrastructure networks. Through consultation with Hamilton City Council and Waikato Waters, network modelling has been, and continues to be, undertaken to confirm the preferred wastewater and water servicing solutions. For wastewater, a new public reticulation network, including two wastewater pump stations, rising mains and emergency storage, is proposed. The Infrastructure Report (refer to Industrial North - Appendix 13) identifies a range of connection options to the existing Hamilton City wastewater network, including connection via the Karen Crescent pump station or Higgins Road network. For water supply, a range of servicing options have similarly been considered. The preferred approach provides for staged servicing, with Stage 1A supplied through the existing network via Higgins Road, Stage 1B via Wickham Street, and Stages 2 and 3 through a new connection from the Kahikatea Drive trunk main along the Hamilton Southern Links corridor. This approach provides flexibility for the development to respond to existing network capacity and planned strategic infrastructure upgrades. For water, with the approved surface water take, the modelling with Hamilton City and IAWAI focused on the levels of service and pressure within the existing network to service the SL1 Residential South site. As outlined in the Infrastructure Report refer to Industrial North - Appendix 13 a staged approach to water servicing can be adopted which limits the potential effects within the adjoining catchment. Localised

Objective / Policy	Comment
	improvements and upgrades have been identified and are expected as part of a phased development occurring. Stormwater will be managed within the development through an integrated treatment and attenuation system comprising on-lot source controls, swales, forebays, artificial stormwater wetlands, detention storage and controlled discharge to the existing drainage network within the Waitawhiriwhiri catchment. Modelling confirms that the proposed system can accommodate the required design events without generating unacceptable effects on upstream or downstream properties. Overall, the proposed staged servicing approach, together with ongoing network modelling and detailed design, provides flexibility to respond to existing infrastructure capacity and wider servicing constraints. Appropriate staging and consent conditions will ensure that infrastructure is available to service each stage of development and that adverse effects on existing infrastructure networks are appropriately managed.
Policy 8: Operation, maintenance and minor upgrade of existing infrastructure (1) Decision-makers must enable the efficient operation and maintenance and minor upgrade of existing infrastructure, provided that, where practicable, adverse effects are avoided, remedied or mitigated.	Policy 8 is principally directed to existing infrastructure rather than the new infrastructure that forms the core of this application. It is nevertheless relevant because the Industrial North servicing strategy relies on connections to, and in some cases coordinated upgrades of, existing Hamilton transport, water, wastewater, stormwater and utility networks. The proposal has been designed so that these connections do not unnecessarily compromise the operation or maintenance of the receiving networks. Wastewater is buffered through enhanced on-site storage and off-peak pumping; water supply is staged to match existing and future network capacity; stormwater discharges are treated and attenuated before entering existing drainage infrastructure; and road connections are coordinated with the existing street network and the future Southern

Objective / Policy	Comment
	Links corridor. Public assets will be vested where appropriate and operation and maintenance plans will be provided for relevant stormwater devices. Accordingly, while Policy 8 is not the principal enabling policy for the proposal, the staged connection and upgrade strategy supports the continued efficient operation and maintenance of existing infrastructure and manages effects on those networks. The proposal is consistent with the intent of Policy 8.
Policy 9: Managing the effects of new infrastructure and major upgrades (1) Decision-makers must enable new infrastructure or major upgrades of existing infrastructure activities in all environments. (2) Where infrastructure activities are proposed to locate in or are likely to have adverse effects on environments and values provided for in section 6 of the Act, the provisions of this policy must be read alongside other relevant national direction, regional policy statements and regional and district plans. (3) Where (2) does not apply, the adverse effects of new infrastructure and major upgrades must be, where practicable, avoided, remedied or mitigated.	The application includes substantial new infrastructure required to enable the Industrial North development, including new roads and intersections, stormwater wetlands and conveyance systems, two wastewater pump stations and associated reticulation, new and upgraded water supply connections, and underground power and telecommunications. The proposal therefore falls squarely within the enabling direction of Policy 9. The project infrastructure is not proposed within an identified outstanding natural feature, outstanding natural landscape, significant natural area or other identified section 6 environment within the Site. Nevertheless, the wider AEE and specialist assessments address effects on ecological, freshwater, landscape, archaeological and cultural values, and the proposal includes management measures appropriate to those values. • Stormwater is treated and attenuated through an integrated WSUD treatment train, with climate change adjusted flood management and controlled discharge. • Earthworks effects are managed through erosion and sediment controls and construction management.

Objective / Policy	Comment
	• Potential visual and amenity effects of above ground infrastructure are integrated through the landscape and blue-green framework, while utilities are predominantly underground. • Infrastructure effects on existing networks are managed through staging, storage, capacity modelling and connection conditions. • Tangata whenua values are addressed through the Cultural Impact Assessment(refer to Industrial North – Appendix 24) and continued TWWG involvement in detailed design and implementation. Overall, the proposal enables necessary new infrastructure while avoiding, remedying or mitigating adverse effects where practicable. It is therefore consistent with Policy 9.
Policy 10: Planning for and managing the interface and compatibility of infrastructure with other activities (1) Decision-makers on planning instruments must manage the interface between existing and planned infrastructure and other activities to ensure: (a) infrastructure and other activities are as compatible as practicable; (b) the safe, efficient and effective operation, maintenance and minor upgrades, and major upgrades of existing or planned infrastructure are not compromised by the adverse effects of other activities; and (c) infrastructure activities that are compatible with each other are co-located, while recognising that some types of infrastructure are not compatible. (2) Decision-makers on planning instruments must: (a) engage with infrastructure providers to: (i) understand their existing and planned infrastructure activities and medium to long-term plans;	Policy 10 is framed primarily as direction for planning instruments rather than as a specific resource consent test. Nevertheless, its underlying principles of compatibility, integration and coordination between infrastructure and surrounding activities are directly relevant to Industrial North, particularly given the Site's relationship with the North Island Main Trunk railway, Hamilton's existing urban infrastructure networks and the designated Hamilton Southern Links corridor. The proposal has been comprehensively masterplanned so that the proposed industrial activities and supporting infrastructure are compatible and can function efficiently together. The road hierarchy and lot layout have been designed to integrate with the existing transport network and future Southern Links corridor; three waters infrastructure is incorporated within dedicated corridors and reserves; and power and telecommunications will be installed underground and coordinated within road reserves where practicable. Road, stormwater and utility corridors have

Objective / Policy	Comment
(ii) identify appropriate buffers and other methods to protect existing and planned infrastructure from the adverse effects of new or intensified sensitive and incompatible activities, including direct effects, reverse sensitivity effects, and risks to health and safety; (iii) support the strategic integration of infrastructure with land use activities; (b) identify: (i) activities that are particularly sensitive to the effects of infrastructure; (ii) activities that are compatible with infrastructure, or potentially compatible with appropriate buffers, design standards or mitigation measures; (iii) infrastructure activities that are sensitive to the effects of other infrastructure; (c) apply a range of methods, including, where appropriate: (i) the use of buffers in plans to manage sensitive activities, including new or intensified sensitive activities, and incompatible activities near infrastructure; (ii) design standards to manage the effects of infrastructure on other activities; (iii) special purpose zoning and other spatial-planning layers; and (d) ensure that measures to avoid, remedy or mitigate the effects of other activities on infrastructure are consistent with relevant international standards (that are recognised or used in New Zealand), national standards and recognised best practice standards and methodologies.	also been designed to provide appropriate access for ongoing operation and maintenance. The industrial nature of the development is inherently compatible with the freight, transport and servicing functions of the surrounding infrastructure network. Importantly, the proposal does not introduce new noise-sensitive activities within the industrial precinct that could generate reverse sensitivity effects or constrain the ongoing operation, maintenance or future development of transport and industrial infrastructure. Landscape and stormwater reserves also provide separation and transition at selected interfaces while maintaining the functional requirements of infrastructure. The proposal provides for the timely and coordinated delivery of infrastructure alongside development. Infrastructure will be progressively delivered through the staging framework, with each stage provided with the transport, stormwater, wastewater, water and utility infrastructure required to operate effectively. Future interfaces with Hamilton Southern Links, including intersection and network integration, will be coordinated with NZTA and Hamilton City Council through detailed design. This ensures that development of Industrial North does not compromise the future delivery or operation of the designated corridor and can integrate with it as the wider network is implemented. The infrastructure will also provide significant local and regional benefits. It will extend and connect with existing urban networks, enable substantial additional industrial development capacity and associated employment, and contribute to the social and economic wellbeing of the wider Hamilton community. More broadly, Industrial North and the wider SL1 Growth Cell will establish a significant development and demand base that supports the sequencing and delivery of strategic infrastructure, including Hamilton Southern Links, future strategic wastewater infrastructure including the Southern Wastewater Treatment Plant, and

Objective / Policy	Comment
	the proposed southern water reservoir. The proposal therefore contributes to a coordinated approach to the staging and delivery of infrastructure across the wider growth area. Overall, although Policy 10 is principally directed to plan-making, the Industrial North masterplan and infrastructure strategy give practical effect to its underlying principles. The proposal provides for infrastructure and land use to be compatible, integrated and delivered in a coordinated manner, while protecting the function of existing and planned infrastructure and supporting the delivery of wider regionally significant infrastructure. The proposal is therefore considered consistent with the intent of Policy 10.
Policy 11: Assessing and managing the interface between infrastructure and other activities (1) When assessing and managing the interface between existing and planned infrastructure with other activities, including new or intensified sensitive activities, through planning instruments, decision-makers must: (a) recognise that noise, vibration, dust and visual effects are all typical effects associated with infrastructure activities that can be managed where practicable but not completely avoided; (b) recognise that: (i) amenity values change due to a range of factors; (ii) changes in amenity values from infrastructure activities can be necessary to achieve well-functioning urban and rural environments; and (c) apply the general principle that the primary responsibility for managing adverse effects is on the new activity (including infrastructure) while allowing flexibility for site- and project-specific circumstances.	The SL1 Industrial North development and supporting infrastructure includes best practice adoption of management plans and conditions to avoid, remedy and mitigation potential effects associated with the staged and phased implementation of the development. Construction and operation of roads, pump stations, stormwater devices and other infrastructure will inevitably generate some temporary or ongoing effects such as noise, vibration, dust, traffic activity and visual change. The proposal accepts responsibility for managing those effects through project-specific design, management plans and conditions rather than relying on surrounding land uses to absorb them. The Site is already strongly influenced by existing industrial activities, transport infrastructure and the North Island Main Trunk railway, and the proposal represents a planned consolidation of that industrial/infrastructure character. The Landscape and Visual Assessment (refer to Industrial North – Appendix 12) identifies the receiving environment as highly modified and of low landscape value, while the infrastructure is integrated through planted stormwater reserves, swales, street trees

Objective / Policy	Comment
	and other landscape treatment. Construction effects are to be managed through the Construction Management Plan and erosion and sediment controls. • Pump stations and other infrastructure are located within dedicated reserves and designed to meet relevant servicing and amenity requirements. • Road and utility infrastructure is designed to recognised engineering standards, with underground utilities reducing visual clutter and exposure. • Stormwater infrastructure is integrated as part of the blue-green network, providing treatment and attenuation while contributing landscape and ecological value. • Conditions and management plans provide a proportionate mechanism to manage temporary construction effects and ongoing operational interfaces. Overall, the proposal appropriately recognises the nature of infrastructure effects and provides a site-specific framework to manage those effects while enabling necessary infrastructure. It is considered consistent with the intent of Policy 11.

1.6 National Policy Statement for Natural Hazards 2025

Objective / Policy	Comment
Objective	The Industrial North proposal adopts the risk-based and proportionate approach sought by the NPS-NH. The natural hazards relevant to the Site have been assessed through the Infrastructure Report (refer to Industrial North - Appendix 13) and

Barker & Associates

+64 375 0900 | admin@barker.co.nz | barker.co.nz

Kerikeri | Whangārei | Warkworth | Auckland | Hamilton | Cambridge | Tauranga | Havelock North | Wellington | Christchurch | Wānaka & Queenstown

Objective / Policy	Comment
(1) Natural hazard risk to people and property associated with subdivision use and development is managed using a risk-based proportionate approach.	Geotechnical Investigation Report (refer to Industrial North - Appendix 17), supported by the Stormwater Management Plan (refer to Industrial North - Appendix 14) and the Geotechnical Effects Preliminary Management Plan (refer to Industrial North - Appendix 18). The assessments address flooding and inundation, seismicity and liquefaction, slope and batter stability, soft-soil subsidence and load induced settlement, groundwater drawdown/dewatering effects, erosion and other geotechnical hazards relevant to the proposed industrial subdivision. The geotechnical natural hazard assessment applies the NPS-NH likelihood/consequence risk matrix and distinguishes between latent risk in the proposed developed state without controls and residual risk following mitigation. This is important for the Site because some hazards have elevated latent risk, including very high latent risk from soft-soil subsidence and high latent risk from dewatering effects and flooding. Those risks are reduced through site-specific engineering responses including preloading and consolidation, engineered fill, lot-specific foundation design, slope design and stabilisation, groundwater and settlement monitoring, a Trigger Action Response Plan, stormwater attenuation, maintained hydraulic connectivity and safe overland flow paths. The Geotechnical Investigation Report concludes that the Site is suitable for the proposed Industrial Development from a geotechnical/geohazards perspective, subject to the identified recommendations and controls. The stormwater modelling likewise demonstrates that the proposed system reduces post-development peak flows and manages extreme event conveyance. Accordingly, natural hazard risk has been identified, assessed and reduced through measures proportionate to the nature and severity of each hazard, and the proposal is considered consistent with the Objective.

Objective / Policy	Comment
Policy 1 When considering natural hazard risk associated with subdivision, use or development, the risk level must be assessed using the risk matrix.	The natural hazard assessment has expressly applied a risk matrix derived from Appendix 1 of the NPS-NH, combining likelihood and consequence to determine the risk rating for each relevant hazard. The assessment considers both the latent risk of the proposed developed state without geotechnical controls and the residual risk after the proposed engineering and management measures are implemented. The risk assessment identifies, amongst other matters, very high latent risk from soft-soil subsidence, reducing to medium residual risk following preloading and consolidation; high latent risk from dewatering effects, reducing to low residual risk following drawdown assessment, monitoring and controls; and high latent flood risk, reducing to medium residual risk following the proposed stormwater and flood-management response. Other geotechnical hazards, including erosion, slope instability, bearing-capacity failure and cut/fill batter instability, are reduced to low residual risk through specific design controls. Liquefaction is also addressed through the geotechnical design response, including preloading/capping and future lot-specific foundation design. This provides a transparent and proportionate basis for identifying which hazards require more intensive mitigation and monitoring. The proposal therefore directly follows the risk-assessment methodology required by Policy 1.
Policy 2 Natural hazard risk associated with subdivision, use and development must be managed using an approach that is proportionate to the level of natural hazard risk.	The proposal applies mitigation that is proportionate to the identified level and nature of natural hazard risk rather than adopting a uniform response across the Site. The more significant geotechnical risks are addressed through targeted engineering measures. In particular, potentially excessive settlement within peat and other soft soils is managed through preloading/surcharging of road and infrastructure corridors, engineered fill and future lot-specific foundation solutions such as further surcharge, ground improvement or deep piles. Potential slope and wetland batter instability is managed through detailed geotechnical design, flatter batters or toe buttressing

Objective / Policy	Comment
	where required, appropriate building setbacks and specific foundation design for buildings close to wetlands. Groundwater drawdown and settlement risks are subject to the Geotechnical Effects Preliminary Management Plan, including groundwater and groundsettlement instrumentation, monitoring and a Trigger Action Response Plan that provides defined responses and contingency measures if agreed thresholds are approached or exceeded. This allows construction phase risk to be actively managed and mitigation to be escalated where monitoring demonstrates that this is necessary. Flood risk is managed through an integrated stormwater system comprising on-lot retention or soakage, swales, forebays, three artificial wetlands, attenuation, controlled outlets, maintained hydraulic connectivity and designated overland flow paths. Extreme event flows are routed through road corridors to safe performance criteria, and post-development peak flows are reduced relative to pre-development conditions. The wastewater pump stations are also located above the 1% AEP flood level and clear of identified overland flow paths. These measures are commensurate with the assessed risk and provide greater intervention where latent risk is higher. The proposal is therefore considered consistent with Policy 2.
Policy 3 Where subdivision, use or development is assessed as having very high natural hazard risk, that risk must be avoided.	The geotechnical assessment (refer to Industrial North – Appendix 17) identifies that soft-soil subsidence would present a very high latent risk if the proposed developed landform were established without geotechnical controls. The proposal does not leave that risk unmanaged. Excessive settlement is addressed as an integral part of the development methodology through preloading and consolidation of road and infrastructure corridors, engineered fill and future foundation design appropriate to

Objective / Policy	Comment
	individual industrial lots. The residual subsidence risk is consequently assessed as medium rather than very high. Other elevated latent risks, including dewatering effects and flooding, are assessed as high rather than very high and are reduced through the groundwater, geotechnical and stormwater measures described above. No natural hazard remains at a very high residual risk level once the proposed controls are implemented. In this sense, the proposal avoids exposing people or property to very high natural hazard risk by ensuring that development cannot proceed in the unmitigated form that gives rise to that risk. The proposal is therefore consistent with Policy 3.
Policy 4 Where subdivision, use or development, including any associated mitigation measures, will create or increase significant natural hazard risk on other sites, that risk must be avoided or mitigated using an approach that is proportionate to the level of natural hazard risk.	Potential effects on adjoining land and infrastructure have been specifically considered in the technical assessments (refer to Industrial North – Appendix 13, Appendix 14, Appendix 17 and Appendix 18). The stormwater strategy is designed to maintain hydraulic connectivity through the Site and to avoid transferring flood risk to surrounding properties. A comprehensive HEC-RAS 2D model extends through the Site and into the downstream drainage network. Modelling demonstrates that post-development peak flows are reduced across the assessed design events, including the 100 year climate change event, and that wider flood behaviour remains largely unchanged, with only localised changes requiring management. The system incorporates attenuation, flood storage, controlled discharge, backflow prevention and safe overland flow paths. Geotechnical cross-boundary effects have also been assessed. The Geotechnical Effects Preliminary Management Plan (refer to Industrial North – Appendix 18) records that drawdown associated with Wetland 1 is not predicted to extend to the closest building to the east, while load-induced settlement is expected to occur within the Industrial Area and have negligible effects on neighbouring properties. The NIMT rail corridor is protected through offset distances and proposed boundary settlement

Objective / Policy	Comment
	monitoring. Groundwater drawdown and settlement are also subject to monitoring and TARP procedures so that any unexpected response can be identified and addressed promptly. Accordingly, the proposal has been designed so that mitigation undertaken within the Site does not create or materially increase significant natural hazard risk elsewhere. The combination of modelling, physical design, monitoring and contingency measures provides a proportionate response and is consistent with Policy 4.
Policy 5 Natural hazard risk assessment and decisions must be based on the best available information and must be made even when that information is uncertain or incomplete.	The natural hazard assessment is based on a substantial body of site-specific technical information. This includes boreholes, CPT testing, test pits and laboratory data, groundwater monitoring, liquefaction and seismic assessment, settlement and preload modelling, static and seismic slope-stability analysis, hydrogeological drawdown assessment, catchment hydrology, and 2D flood modelling. These investigations are brought together through the Geotechnical Investigation Report (Industrial North - Appendix 17), Infrastructure Report (Industrial North - Appendix 13), Stormwater Management Plan (Industrial North - Appendix 14) and the Geotechnical Effects Preliminary Management Plan (Industrial North – Appendix 18). The assessments also appropriately acknowledge where further refinement is required at detailed design. For example, future industrial buildings will require lot-specific foundation design; wetland and batter details will be confirmed through detailed geotechnical design, groundwater and settlement monitoring will validate predicted responses, and the GEMP is expressly intended to be reviewed and updated as design and monitoring information develops. Similarly, the stormwater strategy identifies detailed-design matters such as final wetland geometry, soakage confirmation and culvert refinement without treating those matters as impediments to feasibility.

Objective / Policy	Comment
	This is consistent with Policy 5, where decisions are informed by the best information presently available, while residual uncertainty is managed through conservative assumptions, detailed design verification, monitoring and adaptive response rather than being deferred or ignored.
Policy 6 The potential impacts of climate change to at least 100 years into the future must be considered.	Climate change has been expressly incorporated into the stormwater and flood assessment. The Stormwater Management Plan (refer to Industrial North – Appendix 14) uses NIWA downscaled end-century SSP5-8.5 / RCP8.5 rainfall projections and assesses the 100 year ARI climate change event. The design targets include attenuation of that event to no more than 80% of the pre-development discharge, while the piped network and overland flow system are designed to safely manage climate-adjusted design events. The HEC-RAS modelling assesses post-development flood behaviour under the climate change scenario across the wider hydraulic system, including existing upstream and downstream flow paths. This has informed the location and sizing of the wetlands, controlled discharge arrangements, overland flow corridors and development levels. The stormwater system is also designed to operate by gravity and to fully drain following design events, improving operational resilience and reducing reliance on mechanical flood management infrastructure. Long term geotechnical performance has also been considered. Preloading of road and infrastructure corridors is designed to reduce post-construction settlement over the 100 year design life of services, with settlement monitoring and future foundation design providing additional resilience for the developed landform. Taken together, the proposal has considered both future climate related effects and long term ground performance requirements and is considered consistent with Policy 6.

2.0 Waikato Regional Policy Statement

Objective / Policy	Comment
Part 2: Resource Management Overview	
<i>Integrated Management</i>	
Objective IM-O1 – Integrated Management Natural and physical resources are managed in a way that recognises: 1. the inter-relationships within and values of water body catchments, riparian areas and wetlands, the coastal environment, the Hauraki Gulf and the Waikato River; 2. natural processes that inherently occur without human management or interference; 3. the complex interactions between air, water, land and all living things; 4. the needs of current and future generations; 5. the relationships between environmental, social, economic and cultural wellbeing; 6. the need to work with agencies, landowners, resource users and communities; and 7. the interrelationship of natural resources with the built environment.	The development achieves integrated management through the coordinated provision of industrial land, transport connections, three-waters infrastructure, stormwater management and ecological enhancement within a comprehensively planned development. The proposal responds to the relationship between the land resource, the existing drainage network, groundwater, flood processes and freshwater ecology, while providing additional industrial and employment capacity to meet the needs of current and future generations. The existing freshwater environment is highly modified and principally comprises artificial farm drains and drainage canals. The proposal integrates these features with the development through a comprehensive stormwater management system comprising treatment wetlands, forebays, swales, detention and attenuation infrastructure, together with riparian planting and ecological enhancement. These measures recognise the interconnected relationship between land development, stormwater, receiving environments and ecological values. The development is also coordinated with existing and planned physical infrastructure. It adjoins the established Frankton industrial area, the North Island Main Trunk railway and the Hamilton Southern Links corridor, and provides a

	connected industrial road network, walking and cycling facilities and staged three-waters servicing. The proposal therefore provides for industrial development while integrating the management of natural resources, infrastructure and environmental effects.
Objective IM O2-Resource use and development Recognise and provide for the role of sustainable resource use and development and its benefits in enabling people and communities to provide for their economic, social and cultural wellbeing, including by maintaining and where appropriate enhancing: 1. access to natural and physical resources to provide for regionally significant industry and primary production activities that support such industry; 2. the life supporting capacity of soils, water and ecosystems to support primary production activities; 3. the availability of energy resources for electricity generation and for electricity generation activities to locate where the energy resource exists; 4. access to the significant mineral resources of the region; and 5. the availability of water for municipal and domestic supply to people and communities.	The proposal is considered consistent with Objective IM-O2. SL1 Industrial North will convert land into a comprehensively planned industrial precinct comprising 22 serviced industrial lots with supporting roads, infrastructure and stormwater management. The SL1 Industrial North site forms part of the wider SL1 Growth Cell and is located within the strategically identified Hamilton Airport/Southern Links industrial node, immediately adjoining the established Frankton industrial area. This location enables the proposal to make efficient use of strategically located land and existing and planned infrastructure while providing significant economic and employment benefits. In relation to clause (1), the proposal will materially improve access to physical resources needed to support industrial activity in the sub-region. SL1 Industrial North is intended to provide approximately 42 ha of net developable industrial land and around 168,000 m² of future industrial floorspace across the 22 lots. The Future Proof Partners Business Development Capacity Assessment identifies insufficient industrial land and available industrial space in Hamilton over the next 10–30 years, and the proposal directly responds to that shortfall in a location specifically identified for industrial growth. The Economic Assessment (refer to Industrial North – Appendix 29) also identifies broader regional benefits, including sustained employment across a range of skill levels and support for the delivery and sequencing of regionally significant infrastructure such as Hamilton Southern Links and the Southern Wastewater Treatment Plant. There is some tension with clause (2), as the proposal will permanently remove the Site from primary production and substantially modify the existing soil resource.

However, the detailed soil and geotechnical assessments identify extensive peat, shallow groundwater, modified or filled areas and significant wetness and drainage constraints, and confirm that a substantial proportion of the Site is modified or non-productive. The proposal also includes staged erosion and sediment controls, reuse of suitable excavated material where practicable, engineered fill, preloading and ground improvement to manage the physical limitations of the soils. Accordingly, while the existing productive use will cease, the proposal responds to the actual capability and constraints of the soil resource rather than assuming uniform productive value across the Site.

Clauses (3) and (4), relating to energy resources for electricity generation and significant mineral resources, are not directly relevant to Industrial North.

Clause (5) is relevant to the servicing of the development. SL1 Industrial North will be serviced through a staged public water supply network coordinated with existing capacity and planned infrastructure upgrades. A separate surface water take from the Waikato River has already been approved for the SL1 Consortium, including Industrial North, at the existing Hamilton City Council take point to support potable water use (refer to **Industrial North – Appendix 30**). The proposal therefore relies on an approved allocation and reticulated infrastructure rather than seeking an additional freshwater allocation through the Industrial North application.

Overall, SL1 Industrial North strongly supports the resource use and development direction of IM-O2 by enabling substantial new industrial capacity, employment and economic activity in a strategically identified industrial location, while coordinating that growth with significant transport and three-waters infrastructure. Although the proposal will result in the loss of existing rural productive use, the Site's productive constraints are well established and the development represents a more efficient long-term use of the land in the context of the planned Hamilton Airport/Southern Links industrial node. On balance, the proposal is considered consistent with Objective IM-O2.

Objective IM-O4 – Health and wellbeing of the Waikato River

The health and wellbeing of the Waikato River is restored and protected and Te Ture Whaimana o Te Awa o Waikato (the Vision and Strategy for the Waikato River) is achieved.

Although the Industrial North site is not located directly adjoining the Waikato River, it forms part of the wider Waikato River catchment. The site's existing drainage network ultimately connects with the wider Waitawhiriwhiri catchment and therefore forms part of the broader receiving environment relevant to the health and wellbeing of the Waikato River.

The proposal is considered consistent with and supports the objectives and principles of Te Ture Whaimana o Te Awa o Waikato for the following reasons:

- Early engagement has occurred with iwi to ensure a holistic and integrated approach which allowed for iwi input into the design of the project;
- It provides necessary industrial land and related infrastructure to enable development that will improve economic, employment, and in particular environmental outcomes – specifically freshwater quality;
- The project has the potential to strengthen environmental resilience and risk management from natural hazards, including flooding;
- Appropriate management of risks and adverse effects through a comprehensive stormwater management plan and a series of Management Plans through the project construction phase;
- Stormwater treatment wetlands, forebays, swales and associated treatment devices will manage contaminants associated with the proposed industrial development, while riparian planting and ecological enhancement will improve the function of the existing highly modified drainage environment.

	Overall, the development will help to enhance mauri and improve ecosystem functioning from its current degraded state.
Objective IM-O5 – Climate Change Land use is managed to: 1. avoid the potential adverse effects of climate change induced weather variability and sea level rise on: (a) amenity; (b) the built environment, including infrastructure; (c) indigenous biodiversity; (d) natural character; (e) public health and safety; and (f) public access. 2. support reductions in greenhouse gas emissions within urban environments and ensure urban environments are resilient to the current and future effects of climate change.	The proposal responds to Objective IM-O5 through both its location and the design of the supporting infrastructure. The Industrial North site / proposal consolidates additional employment land at Hamilton's established southern industrial edge, adjacent to the Frankton industrial area and existing and planned strategic transport infrastructure. This supports a more compact urban form and avoids establishing a dispersed industrial location that would generate additional infrastructure and travel demand. Climate resilience is embedded into the stormwater and flood-management response. The Stormwater Management Plan (refer to Industrial North - Appendix 14) uses climate change adjusted rainfall assumptions, including RCP8.5 scenarios, and provides for on-lot retention or soakage, swales, forebays, three constructed wetlands, controlled discharge and dedicated overland flow paths. The 2 year and 10 year events are attenuated to pre-development rates and the 100 year climate change event is attenuated to no more than 80% of pre-development discharge. The proposal also incorporates walking and cycling connections and integrates employment growth with the wider SL1 Growth Cell, including planned residential development. These measures support a more resilient urban form and provide alternatives to private vehicle travel. Overall, the proposal appropriately anticipates future climate conditions and is consistent with Objective IM-O5.
Objective IM-O6 – Ecosystem services The range of ecosystem services associated with natural resources are recognised and maintained or enhanced to enable their ongoing contribution to regional wellbeing.	The proposal is considered consistent with Objective IM-O6. The SL1 Industrial North Site is a highly modified rural industrial environment, with limited indigenous terrestrial vegetation and habitat value and an artificial farm-drain network of generally low ecological value. Nevertheless, the proposal has recognised the ecosystem services associated with the Site's land, water, drainage and ecological

systems and incorporates measures to maintain and, in a number of respects, enhance those functions as part of the future industrial development.

A key component of the proposal is the integrated stormwater and ecological response. The stormwater system incorporates source control, swales, forebays and three constructed stormwater wetlands providing water quality treatment, extended detention and attenuation before discharge. This system will perform multiple functions, including managing runoff and flood effects, improving water quality and contributing to ecological and landscape outcomes. The WRPS assessment similarly identifies that the proposed wetlands and riparian planting will provide ecosystem services through stormwater treatment, flood attenuation and improved habitat values, while contributing to the health and wellbeing of the wider Waikato River catchment.

The proposal will also increase indigenous vegetation and habitat within a Site that presently contains limited ecological values. Indigenous and riparian planting is proposed along drainage corridors and around the new stormwater wetlands, with the intention of enhancing freshwater and terrestrial habitat and strengthening ecological connectivity. Potential effects on long-tailed bats, birds, lizards and indigenous freshwater fish will be managed through species-specific ecological management plans. The Ecological Impact Assessment (refer to **Industrial North – Appendix 23**) concludes that, following implementation of these measures, ecological effects will be very low to low with no significant residual effects.

The development will necessarily replace some ecosystem services associated with the Site's existing rural use, including pasture and soil based productive functions. However, the proposed industrial use introduces a more deliberate and managed blue-green network that improves stormwater treatment, habitat provision, ecological connectivity and indigenous vegetation cover compared with the existing highly modified environment.

	Overall, the proposal recognises the ecosystem services provided by the Site's natural resources and incorporates stormwater, planting and ecological management measures that will maintain and enhance important water quality, flood management, habitat and ecological connectivity functions. It is therefore considered consistent with Objective IM-O6.
Objective IM-O7 – Relationship of tangata whenua with the environment 1. The relationship of tangata whenua with the environment is recognised and provided for, including: 2. the use and enjoyment of natural and physical resources in accordance with tikanga Māori, including mātauranga Māori; and 3. the role of tangata whenua as kaitiaki.	The relationship of tangata whenua with the environment has been recognised and provided for through the SL1 Tangata Whenua Working Group, ongoing engagement and the Cultural Impact Assessment(refer to Industrial North – Appendix 24). The cultural assessment applies an integrated methodology that brings together maatauranga Maaori, the collective knowledge of the Working Group and the technical assessments, recognising the interconnected relationships between wai, whenua, taiao and tangata. Tangata whenua input has informed the approach to stormwater management, freshwater ecology, ecological restoration, landscape design and cultural monitoring. The proposal includes indigenous and riparian planting, planted stormwater wetlands and ecological restoration measures that provide opportunities to strengthen mauri, habitat connectivity and long-term environmental resilience. The Cultural Impact Assessment(refer to Industrial North – Appendix 24) also provides for ongoing tangata whenua involvement through implementation and monitoring, including participation in relevant ecological management measures and cultural monitoring during earthworks and construction. These arrangements provide meaningful opportunities for tangata whenua to exercise kaitiakitanga and for maatauranga Maaori to continue to inform the development. The proposal is therefore consistent with Objective IM-O7.
Objective IM-O8 – Sustainable and efficient use of resources	The proposal makes efficient use of land and infrastructure by locating additional industrial capacity immediately adjoining the established Frankton industrial area

Use and development of natural and physical resources, excluding minerals, occurs in a way and at a rate that is sustainable, and where the use and development of all natural and physical resources is efficient and minimises the generation of waste.	and within the wider SL1 Growth Cell identified for urban growth. The approximately 60 ha development is comprehensively masterplanned as serviced industrial lots with coordinated transport, stormwater, wastewater, potable water and utility infrastructure, allowing infrastructure to be delivered progressively alongside each stage of development. Resource efficiency is also reflected in the engineering response. The stormwater system performs multiple functions through source control, water quality treatment, attenuation, flood storage and ecological enhancement. Existing and planned transport and three waters networks are used where practicable, with staged upgrades provided as demand increases. Suitable excavated and stockpiled material may also be reused on site where it meets geotechnical and contamination requirements, reducing unnecessary off-site disposal and imported fill. The proposal therefore enables a substantial increase in industrial land and floorspace supply in a strategically appropriate location while integrating infrastructure, environmental management and resource efficiency. It is considered consistent with Objective IM-O8.
Objective IM-O9 – Amenity 1. The qualities and characteristics of areas and features, valued for their contribution to amenity, are maintained or enhanced; and 2. Where intensification occurs in urban environments, built development results in attractive, healthy, safe and high-quality urban form which responds positively to local context whilst recognising that amenity values change over time in response to the changing needs of people, communities and future generations, and such changes are not, of themselves, an adverse effect.	The proposal aligns with Objective IM-O9 by delivering a high-quality, master-planned industrial environment that appropriately manages amenity effects and supports industrial growth in a way that is context-responsive and future-focused. The development incorporates a comprehensive landscaping strategy, including street planting, landscaped interfaces, indigenous planting and the establishment of vegetated stormwater wetlands and drainage corridors. These measures will increase greening across the site and contribute to the amenity and visual quality of the proposed industrial environment. The proposal is located adjoining the established Frankton industrial area and within a strategically identified industrial node. The resulting change in character and

	amenity is therefore consistent with the planned long-term development of this location for industrial activities. The development acknowledges that amenity values evolve as urban areas grow and land uses change. While the proposal will result in a significant change from the existing environment, it will establish a comprehensively planned industrial environment with landscaping, ecological enhancement and appropriate interface treatments. This is consistent with the RPS direction that changes in amenity associated with anticipated development are not necessarily adverse effects.
Policy IM-P1 – Integrated approach An integrated approach to resource management will be adopted that: recognises the interconnected nature of natural and physical resources; maximises the benefits and efficiencies of working together; recognises multiple resource values and ecosystem services; responds to the nature and values of resources and the diversity and cumulative effects that can occur; maximises opportunities to achieve multiple objectives; takes a long-term strategic approach; applies consistent and best-practice standards; and establishes clear limits and thresholds where appropriate.	The proposal adopts an integrated approach to the development and management of the Industrial North site. The subdivision, industrial land use, transport network, three-waters servicing, earthworks, stormwater management, ecological mitigation, landscaping and interface treatments have been considered together through the masterplanning and technical assessment process rather than as separate development components. This approach recognises the interconnected nature of the site's land, groundwater, drainage, ecological and infrastructure systems. In particular, stormwater infrastructure performs multiple functions by providing attenuation and water-quality treatment while also contributing to ecological enhancement, riparian restoration and landscape outcomes. Transport infrastructure is similarly coordinated with the industrial subdivision and the existing and future strategic transport network, including the Hamilton Southern Links corridor. The staged development approach also provides for the infrastructure required to service each stage while maintaining an integrated long-term development outcome. The proposal is supported by specialist assessments and management plans addressing infrastructure, stormwater, hydrology, ecology, geotechnical conditions, contaminated land, transport, landscape and cultural values.

Policy IM-P3 – Tangata Whenua

Tangata whenua are provided appropriate opportunities to express, maintain and enhance the relationship with their rohe through resource management and other local authority processes.

The wider project has actively provided for meaningful involvement of tangata whenua in the planning and design process, including opportunities to participate in design and environmental management considerations. The development has recognised the mana of tangata whenua as kaitiaki, including of indigenous biodiversity, as further set out in the Engagement and Consultation Report at (refer to **Industrial North – Planning Attachment 2**) and the Cultural Impact Assessment at **Industrial North – Appendix 24**. In particular:

- The proposed landscaping and ecological enhancement measures will increase indigenous vegetation and habitat values across the site, including through riparian planting and enhancement associated with the drainage corridors and proposed stormwater wetlands.
- Potential impacts on indigenous fish within the existing artificial drainage network will be managed in accordance with the proposed Fish Management Plan (**Industrial North – Appendix 23**).
- Potential impacts on copper skinks are addressed through the Lizard Management Plan (**Industrial North – Appendix 23**), including measures for salvage, location and habitat enhancement.
- Effects on long-tailed bats are addressed through the Bat Management Plan (**Industrial North – Appendix 23**), including appropriate protocols for vegetation clearance and lighting controls.
- The proposal recognises tangata whenua relationships with whenua, wai and the wider taiao through the integrated approach to stormwater management, ecological enhancement and landscape design. The Cultural Impact Assessment (refer to **Industrial North – Appendix 24**) recognises the wider SL1 area as a culturally significant

	landscape and identifies the relationships between tangata whenua, waterways, whenua and natural systems. • The establishment and enhancement of indigenous planting, drainage corridors and stormwater wetlands provide opportunities for the ongoing involvement of tangata whenua in environmental management and supports their role as kaitiaki. • The process for SL1 Industrial North has been structured to allow tangata whenua values and perspectives to inform the development and associated environmental management, consistent with the principles of Te Tiriti o Waitangi. • Overall, the SL1 Industrial North development has recognised the mana of tangata whenua as kaitiaki and provided for their relationship with natural and physical resources.
Policy IM-P5 – Maintain and enhance areas of amenity value Areas of amenity value are identified, and those values are maintained and enhanced. These may include: 1. areas within the coastal environment and along inland water bodies; 2. scenic, scientific, recreational or historic areas; 3. areas of spiritual or cultural significance; 4. other landscapes or seascapes or natural features; and 5. areas adjacent to outstanding natural landscapes and features that are visible from a road or other public place.	The Landscape and Visual Assessment (refer to Industrial North - Appendix 12) identifies the Industrial North area as a highly modified rural industrial edge of low landscape value, influenced by existing industrial activity, the railway corridor, hardstand, storage areas and planned strategic infrastructure. The proposal will change the remaining rural openness of the Site, particularly at the southern and western interfaces, but this change occurs within a growth area where a stronger urban industrial character is anticipated. Amenity effects are addressed through a coherent blue-green and landscape framework comprising planted stormwater reserves, wetland and pond margins, swales, street and frontage trees and specimen planting. These measures will provide visual relief, soften roads and internal edges and improve integration as planting matures. The Landscape and Visual Assessment concludes that landscape

	and visual effects are low adverse (less than minor), with effects concentrated within the Site and its immediate interfaces. Operational noise is also managed through conditions that maintain compatibility with nearby residential, rural and industrial receivers and avoid reverse-sensitivity effects from noise-sensitive activities within the precinct. On this basis, the proposal appropriately maintains and manages the amenity values relevant to this transitioning urban edge and is consistent with Policy IM-P5.
Part 3: Domains and Topics	
<i>Land and freshwater</i>	
Objective LF-O1 – Mauri and values of fresh water bodies Maintain or enhance the mauri and identified values of fresh water bodies including by: 1. maintaining or enhancing the overall quality of freshwater within the region; 2. safeguarding ecosystem processes and indigenous species habitats; 3. safeguarding the outstanding values of identified outstanding freshwater bodies and the significant values of wetlands; 4. safeguarding and improving the life supporting capacity of freshwater bodies where they have been degraded as a result of human activities, with demonstrable progress made by 2030; 5. establishing objectives, limits and targets, for freshwater bodies that will determine how they will be managed; 6. enabling people to provide for their social, economic and cultural wellbeing and for their health and safety; 7. recognising that there will be variable management responses required for different catchments of the region; and 8. recognising the interrelationship between land use, water quality and water quantity.	The project overall has considered and embeds freshwater protection, enhancement and integrated catchment management into the design, particularly through the management and enhancement of the existing artificial drainage network and the establishment of new stormwater treatment wetlands. These features ultimately discharge to the Waitawhiriwhiri West Stream and form part of the wider Waikato River catchment. Te Mana o te Wai recognises the fundamental importance of water and that protecting the health of freshwater supports the health and wellbeing of the wider environment. The proposed Industrial North development has been designed and planned to respond to these principles through integrated land and water management, ecological enhancement and cultural engagement. The existing site is highly modified and contains an artificial drainage network. The proposal will establish new vegetated stormwater wetlands and enhance drainage corridors through indigenous and riparian planting, providing opportunities to improve water quality and ecological habitat. The proposed stormwater management system will provide treatment and attenuation of runoff before discharge to the receiving environment. In addition:

- The development adopts a catchment-based approach to water management, recognising the relationship between industrial development, stormwater quality and quantity, groundwater, existing drainage systems and downstream receiving environments. The proposed Stormwater Management Plan (refer to **Industrial North - Appendix 14**) identifies the measures that will be implemented to manage stormwater quantity and quality associated with runoff from the development.
- The development recognises tangata whenua relationships with freshwater and provides for ongoing tangata whenua involvement in environmental management, as further detailed in the Engagement and Consultation Report (refer to **Industrial North Planning Attachment 2**) and Cultural Impact Assessment (refer to **Industrial North – Appendix 24**).
- Potential effects on freshwater ecological values within the existing drainage network will be managed through the ecological management measures identified in the EclA (refer to **Industrial North – Appendix 23**) and associated Ecological Management Plans (refer to **Industrial North – Appendix 23**).
- Construction-related effects on freshwater will be managed through erosion and sediment controls and other construction management measures to minimise sediment and contaminant discharges to the receiving environment.
- The proposal will enable strategically identified industrial development that provides for the social and economic wellbeing of current and future generations while appropriately managing effects on freshwater resources.

	Overall, the proposal provides an integrated approach to industrial development and freshwater management and is considered consistent with Objective LF-O1.
Objective LF-O2 – Allocation and use of fresh water The allocation and use of fresh water is managed to achieve freshwater objectives (derived from identified values) by: 1. avoiding any new over-allocation of ground and surface waters; 2. seeking to phase out any existing over-allocation of ground and surface water bodies by 31 December 2030; 3. increasing efficiency in the allocation and use of water; and 4. recognising the social, economic and cultural benefits of water takes and uses.	A separate surface water take from the Waikato River has been approved, refer Industrial North - Appendix 30, which provides the SL1 Consortium, inclusive of SL1 Industrial North, with a surface water take from the Waikato River at the existing HCC take point to support potable water use. The Industrial North development will be serviced through an extension of the existing public water supply network. A staged approach to water servicing is proposed, responding to existing network capacity and planned upgrades, with the preferred servicing option providing connections via Higgins Road and Wickham Street for the initial stages and a future connection to the Kahikatea Drive trunk main for later stages. The Infrastructure Report (refer to Industrial North - Appendix 13) confirms that a range of viable servicing options are available and can be refined through detailed design and staging. The proposal therefore utilises an approved water allocation and existing and planned reticulated infrastructure to meet the water requirements of the development. No additional surface water or groundwater allocation is proposed as part of the Industrial North application. Accordingly, the proposal is considered consistent with Objective LF-O2.
Objective LF-O3 – Riparian areas and wetlands Riparian areas (including coastal dunes) and wetlands are managed to: 1. maintain and enhance: (a) public access; and (b) amenity values. 2. maintain or enhance: (a) water quality; (b) indigenous biodiversity;	The development will establish new vegetated stormwater wetlands and enhance riparian areas associated with the existing artificial drainage network. These features will contribute to the amenity of the Industrial North development while increasing indigenous vegetation and habitat across the site. The three proposed stormwater wetlands will provide treatment and attenuation of stormwater prior to discharge to the existing drainage network. Riparian planting around the wetlands, drainage corridors and outlet structures will further assist with

(c) natural hazard risk reduction; (d) cultural values; (e) riparian habitat quality and extent; and (f) wetland quality and extent.	water quality, ecological enhancement and the long-term stability of the drainage system. The wetlands will also provide flood attenuation and contribute to the management of natural hazard risk. The development will therefore increase the extent of vegetated wetland habitat and enhance riparian habitat within what is currently a highly modified environment. This will provide opportunities to improve indigenous biodiversity, ecological connectivity and the quality of the site's freshwater environment.
Objective LF-O4 – Values of soil The soil resource is managed to safeguard its life supporting capacity, for the existing and foreseeable range of uses. Objective LF-O5 – High class soils The value of high class soils for primary production is recognised and high class soils are protected from inappropriate subdivision, use or development.	Objectives LF-O4 and LF-O5 seek to safeguard the life supporting capacity of the soil resource for existing and foreseeable uses, while recognising the value of high class soils for primary production and protecting them from inappropriate subdivision, use and development. The proposal has been assessed conservatively having regard to both the actual characteristics and condition of the soil resource and the transitional NPS-HPL framework. The detailed Soil and Land Use Capability Assessment (refer to Industrial North – Appendix 28) demonstrates that the regional scale mapping does not fully reflect the site-specific productive characteristics of the Industrial North Site. Approximately 29.1 ha (53%) is identified as productive LUC Classes 2-4, while the balance comprises modified LUC Class 7 soils or non-productive land. The productive component is predominantly peat or peaty soils affected by poor to very poor drainage, high groundwater levels and seasonal wetness, which materially constrain versatility and long-term productive potential. None of the Site also qualifies as "High Class Soil" under the Waipaa Operative District Plan definition, including because the relevant LUC Class 2 soils are peat/Organic soils. The remaining productive land is further constrained by the existing and consented environment. The Hamilton Southern Links designation separates the productive component into two disconnected blocks of approximately 13.0 ha and 16.1 ha, while significant areas of the Site are already affected by industrial activities, fill,

	artificial drainage and implemented bulk earthworks consents. These factors materially reduce the ability of the Site to function as a cohesive and efficient primary-production unit and are relevant to both the existing value of the soil resource and its reasonably foreseeable long term use. The proposal will nevertheless manage the soil resource in a manner appropriate to its future industrial use. Earthworks, contaminated soils and unsuitable fill will be managed through the proposed earthworks and remediation framework, including controlled soil handling, validation and appropriate reuse or disposal of material where required. This will ensure that soil quality and associated effects on human health, water and the surrounding environment are appropriately managed as the Site is developed. The wider landscape and stormwater response also retains areas of vegetated land within planted stormwater reserves, wetlands and riparian corridors, supporting ongoing soil, water and ecological functions within the completed industrial environment. Accordingly, while the proposal will permanently convert land presently treated as highly productive land under the transitional NPS-HPL provisions, the site specific evidence demonstrates that the affected soil resource is variable in quality, constrained by wetness and peat conditions, fragmented and substantially modified. The detailed NPS-HPL assessment addresses the applicable statutory pathways separately. In the context of LF-O4 and LF-O5, the proposal appropriately recognises and manages the actual values and limitations of the Site's soil resource and is not considered to represent inappropriate development of a highly versatile, intact or cohesive high-class soil resource.
Policy LF-P2 – Outstanding fresh water bodies and significant values of wetlands Ensure that the outstanding values of a fresh water body that result in that water body being identified as an outstanding fresh water body, and the	No outstanding freshwater body or natural inland wetland has been identified within the Industrial North Site. The EclA (refer to Industrial North - Appendix 24) describes the existing freshwater environment as a network of artificial farm drains of negligible to low ecological value, with shortfin eel the only fish species recorded.

significant values of wetlands, are protected and where appropriate enhanced.	Notwithstanding the modified baseline, the proposal provides a substantive freshwater enhancement response. Three constructed stormwater wetlands, forebays, swales and associated riparian planting will provide water quality treatment, extended detention and attenuation before controlled discharge to the receiving drainage network. The planted wetland and drainage margins will also increase indigenous vegetation and habitat diversity within the Site. Potential effects on freshwater fauna during reclamation of artificial drains will be managed through the Fish Management Plan, including fish recovery and relocation, while construction related sediment effects will be managed through erosion and sediment controls. The EclA (refer to Industrial North – Appendix 23) concludes that, following effects management, freshwater effects are low and no significant residual ecological effects remain. The proposal is therefore consistent with the protective intent of Policy LF-P2.
Policy LF-P3 – All fresh water bodies Manage the effects of activities to maintain or enhance the identified values of fresh water bodies and coastal water including by: 1. reducing: (a) sediment in fresh water bodies and coastal water (including bank instability) that is derived from human based activities; (b) accelerated sedimentation of estuaries; (c) microbial and nutrient contamination; (d) other identified contaminants; and 2. Where appropriate, protection and enhancement of: (a) riparian and wetland habitat; (b) instream habitat diversity; (c) indigenous biodiversity; and (d) providing for migratory patterns of indigenous freshwater species up and down rivers and streams and to the coastal marine area where practicable; and	The proposal has been designed to manage the effects of industrial development on freshwater bodies and the downstream receiving environment. The existing freshwater environment within Industrial North is highly modified and principally comprises an artificial drainage network, which ultimately discharges to the Waitawhiriwhiri West Stream. The proposed stormwater management strategy provides an integrated treatment train to manage the quantity and quality of stormwater runoff before discharge to the receiving environment. This includes on-lot source controls, swales, forebays, stormwater treatment wetlands, detention and controlled discharge. The approach is detailed in the Stormwater Management Plan (refer to Industrial North – Appendix 14) and Infrastructure Report (refer to Industrial North – Appendix 13). In addition:

2. avoiding: (a) physical modification of fresh water bodies where practicable; and (b) inappropriate development in flood plains; and 3. managing: (a) groundwater and surface water flow/level regimes, including flow regime variability; (b) linkages between groundwater and surface water; and (c) pest and weed species where they contribute to fresh water body and coastal water degradation.	• indigenous and riparian planting associated with the drainage corridors and proposed wetlands will contribute to freshwater habitat and ecological enhancement; • potential effects on indigenous freshwater species will be managed through the measures identified in the EclA (refer to Industrial North – Appendix 23) and associated Ecological Management Plans (refer to Industrial North – Appendix 23); • construction-related sediment and contaminant effects will be managed through erosion and sediment controls and construction management measures; and • the stormwater system has been designed to manage post-development flows and water quality, recognising the relationship between land-use intensification and the downstream freshwater environment.
Policy LF-P6 – Allocating fresh water Manage the increasing demand and competition for water through the setting of allocation limits, efficient allocation within those limits, and other regional plan mechanisms which achieve identified freshwater objectives and: 1. maintain and enhance the mauri of fresh water bodies; 2. retain sufficient water in water bodies to safeguard their life-supporting capacity and avoid any further degradation of water quality; 3. enable the existing and reasonably justified foreseeable domestic or municipal needs of people and communities and an individual's reasonable animal drinking water requirements to be met (with discretion to consider additional allocations for those particular uses in fully and over-allocated catchments);	A separate surface water take from the Waikato River has been approved (Industrial North – Appendix 30) which provides the SL1 Consortium, including SL1 Industrial North, with a surface water take from the Waikato River at the existing Hamilton City Council take point to support potable water supply. The Industrial North development will be serviced through the public water supply network, with a staged servicing approach proposed to respond to existing network capacity and planned infrastructure upgrades. The Infrastructure Report (Industrial North - Appendix 13) identifies the available servicing options and the infrastructure required to provide an appropriate level of service as development proceeds. The proposal therefore relies on an existing approved water allocation and reticulated infrastructure rather than seeking an additional allocation of freshwater through the Industrial North application. This approach supports the efficient

4. avoid any reduction in the generation of electricity from renewable electricity generation activities, including the Waikato Hydro Scheme; and 5. recognise that lawfully existing water takes (including those for regionally significant industry and primary production activities supporting that industry) contribute to social, economic and cultural wellbeing and that significant investment relies on the continuation of those takes.	allocation and use of freshwater while providing for the water requirements of the proposed industrial development.
Policy LF-P7 – Efficient use of fresh water Ensure that the allocated water resource is used efficiently.	A separate surface water take from the Waikato River has been approved, Industrial North - Appendix 30, which provides the SL1 Consortium, inclusive of SL1 Industrial North, with a surface water take from the Waikato River at the existing HCC take point to support potable water use. The approved consent includes appropriate conditions to manage the efficient use of the allocated water resource. The Industrial North development will be serviced through a staged public water supply network, with the servicing approach responding to existing network capacity and planned infrastructure upgrades, as detailed in the Infrastructure Report (Industrial North – Appendix 13).
Policy LF-P8 – Maintain or enhance the life supporting capacity of the soil resource Manage the soil resource to: 1. minimise sedimentation and erosion; 2. maintain or enhance biological, chemical and physical soil properties; and 3. retain soil versatility to protect the existing and foreseeable range of uses of the soil resource.	The proposal will substantially modify the existing soil resource through earthworks required to establish stable industrial platforms, roads and infrastructure. The physical characteristics of the soils have been investigated through the Soil and Land Use Capability Assessment (refer to Industrial North - Appendix 28) and Geotechnical Investigation Report (refer to Industrial North - Appendix 17), which identify extensive peat, shallow groundwater and areas of modified or fill material. Earthworks will be staged and undertaken with erosion and sediment controls designed in accordance with Waikato Regional Council guidance to minimise soil loss and sediment discharge. Suitable excavated material will be retained and reused on site where practicable and where it meets geotechnical and contamination requirements. Engineered fill, preloading and ground improvement

	will be used to manage settlement and maintain the long term performance of development platforms and infrastructure. While the proposal will result in the permanent conversion of the remaining rural soil resource, the detailed LUC assessment confirms that a substantial proportion of the Site is modified or non-productive and that the remaining productive soils have significant wetness and drainage constraints. The proposal therefore appropriately manages soil disturbance, erosion and the physical limitations of the soil resource in the context of its foreseeable urban-industrial use.
Policy LF-P9 – Soil contaminants Ensure that contaminants in soils are minimised and do not cause a reduction in the range of existing and foreseeable uses of the soil resource. Particular attention will be given to the potential for effects on: 1. human health; 2. animal health; 3. suitability of soil for food production; 4. micro-nutrient availability; 5. soil ecology; and 6. groundwater.	The Detailed Site Investigation (refer to Industrial North - Appendix 21) and the area specific Contaminated Soils Management / Remediation Action Plans (refer to Industrial North - Appendix 22) identify and provide a clear framework for managing the localised contamination associated with historical fill, storage, transport and industrial activities across parts of the Site. The investigations identified localised hydrocarbon contamination in shallow soils within storage yard areas, isolated elevated metals, and variable fill materials. The wider investigations conclude that, outside these identified areas, contaminant concentrations generally do not present a significant risk for the proposed commercial/industrial land use. The remediation plans adopt commercial/industrial human-health and environmental criteria and a risk-based approach to residual uncertainty. Management measures include controlled excavation and soil handling, segregation and validation testing, reuse of suitable material where demonstrated to be appropriate, off-site disposal of contaminated or unsuitable material to an authorised facility, dust and stormwater controls, equipment decontamination and an Unexpected Discovery Protocol. These measures will protect human health and prevent unacceptable effects on soil, groundwater, surface water and air quality

	during and following development. The proposal is therefore consistent with Policy LF-P9.
LF-P10 – Peat soils Manage the adverse effects of activities resulting from use and development of peat soils, including by slowing the rate of subsidence and the loss of carbon by oxidation from peat soils.	The proposal is considered generally consistent with Policy LF-P10. Peat soils are a physical constraint across substantial parts of SL1 Industrial North and have been specifically identified through the geotechnical and land-capability investigations. The peat is associated with shallow groundwater, poor drainage, settlement and long-term subsidence risk, and these characteristics have directly influenced the proposed development levels, earthworks strategy, ground improvement and infrastructure design. The proposal will involve substantial earthworks to establish stable industrial platforms, roads and infrastructure. The engineering response includes preloading, engineered fill, ground improvement, settlement and groundwater monitoring, and lot-specific foundation design to manage the effects of developing on peat soils. The Infrastructure Report identifies that preloading of road and infrastructure corridors will specifically be used to mitigate peat settlement. The potential effects of groundwater change have also been recognised. Groundwater and settlement monitoring, including trigger and action procedures, are proposed to manage dewatering and cross-boundary effects. This is relevant to the policy direction to slow subsidence and peat oxidation, because maintaining control over groundwater drawdown reduces the potential for peat to dry out and oxidise. The land capability assessment also recognises that deeper drainage should not be assumed to be an appropriate means of increasing productive use of the peat soils, given the associated oxidation and subsidence risks. While the proposed industrial development will permanently modify the existing peat resource, the proposal has been designed around those constraints rather than disregarding them.

	The supporting material does not appear to quantify the amount of carbon that may be lost through peat oxidation. Accordingly, it would be inappropriate to conclude that carbon loss will be entirely avoided. Rather, the proposal manages the key processes that could accelerate peat oxidation and subsidence through controlled earthworks, ground improvement, groundwater management and monitoring. Overall, while SL1 Industrial North will result in substantial modification of peat soils, the risks of settlement, subsidence and groundwater-related effects have been specifically assessed and incorporated into the engineering design and monitoring framework. The proposal therefore appropriately manages the adverse effects of developing peat soils and is considered generally consistent with Policy LF-P10.
LF-P11 – High Class Soils Avoid a decline in the availability of high class soils for primary production due to inappropriate subdivision, use or development.	The proposal will result in the permanent conversion of land that is conservatively treated as highly productive land under the transitional NPS-HPL provisions. However, the detailed Soil and Land Use Capability Assessment (refer to Industrial North – Appendix 28) demonstrates that the Site does not contain 'High Class Soil' as defined in the Waipa Operative District Plan and that the regional scale mapping materially overstates the extent and versatility of the land actually available for productive use. Only approximately 29.1 ha (53%) of the Site comprises productive LUC Classes 2-4 land, while approximately 47% is modified LUC Class 7 or non-productive land. The productive soils are predominantly peat or peaty soils affected by poor to very poor drainage and high water tables. Their practical use is further constrained by existing industrial and modified land, implemented earthworks consents and the Hamilton Southern Links designation, which divides the productive area into two disconnected blocks and prevents it functioning as a single conventional stand-alone farming unit. Industrial North consolidates urban growth at Hamilton's established industrial edge within a strategically identified growth area, rather than creating dispersed

	urban development across larger and more cohesive productive rural landholdings. The detailed NPS-HPL assessment addresses the applicable statutory pathways separately. In this context, the proposed conversion is considered appropriate and the extent of conflict with the underlying intent of LF-P11 is materially limited by the Site's constrained, fragmented and modified productive resource.
<i>Ecosystems & Indigenous Biodiversity</i>	
Objective ECO-O1 – Ecological integrity and indigenous biodiversity The full range of ecosystem types, their extent and the indigenous biodiversity that those ecosystems can support exist in a healthy and functional state.	The EclA (refer to Industrial North - Appendix 23) identifies the existing Industrial North site as highly modified, with limited indigenous terrestrial vegetation and habitat values. Notwithstanding the modified nature of the site, ecological values associated with indigenous fauna and the existing artificial drainage network have been identified and appropriately considered. The proposal incorporates avoidance, minimisation, remediation and mitigation measures to manage effects on indigenous biodiversity. Species-specific measures are proposed for bats, birds, lizards and indigenous freshwater fish through the Ecological Management Plans (refer to Industrial North - Appendix 23). The proposed landscaping and ecological enhancement strategy will also increase indigenous vegetation and habitat across the site through: • indigenous and riparian planting associated with the existing drainage corridors; • establishment and planting of new stormwater wetlands; • enhancement of freshwater and terrestrial habitat and ecological connectivity; and • implementation of species-specific management measures during construction and operation.

Policy ECO-P1 – Maintain or enhance indigenous biodiversity Promote positive indigenous biodiversity outcomes to maintain the full range of ecosystem types and maintain or enhance their spatial extent as necessary to achieve healthy ecological functioning of ecosystems, with a particular focus on: 1. working towards achieving no net loss of indigenous biodiversity at a regional scale; 2. the continued functioning of ecological processes; 3. the re-creation and restoration of habitats and connectivity between habitats; 4. supporting (buffering and/or linking) ecosystems, habitats and areas identified as significant indigenous vegetation and significant habitats of indigenous fauna; 5. providing ecosystem services; 6. the health and wellbeing of the Waikato River and its catchment; 7. contribution to natural character and amenity values; 8. tangata whenua relationships with indigenous biodiversity including their holistic view of ecosystems and the environment; 9. managing the density, range and viability of indigenous flora and fauna; and 10. the consideration and application of biodiversity offsets.	The project overall embeds positive biodiversity outcomes into the design, contributing to the maintenance and enhancement of indigenous biodiversity at both the site and catchment scale. The Industrial North site is highly modified with limited existing indigenous vegetation and habitat; however, the proposal provides opportunities to enhance indigenous biodiversity through native planting, riparian enhancement and the establishment and planting of stormwater wetlands. These measures will support ecological connectivity, the creation and enhancement of habitat and the continued functioning of local ecological processes. The proposed wetlands and riparian planting will also provide ecosystem services through stormwater treatment, flood attenuation and improved habitat values, while contributing to the health and wellbeing of the wider Waikato River catchment. Potential effects on indigenous fauna, including long-tailed bats, lizards, birds and indigenous freshwater fish, will be managed through the measures identified in the EclA (refer to Industrial North - Appendix 23) and associated Ecological Management Plans (refer to Industrial North - Appendix 23). The proposal also recognises tangata whenua relationships with indigenous biodiversity through ongoing engagement and the incorporation of cultural values into the landscape, freshwater and ecological response, as detailed in the Engagement and Consultation Report (refer to Industrial North Planning Attachment 2) and Cultural Impact Assessment (refer to Industrial North – Appendix 24).
Policy ECO-P2 – Protect significant indigenous vegetation and significant habitats of indigenous fauna Significant indigenous vegetation and the significant habitats of indigenous fauna shall be protected by ensuring the characteristics that contribute to its significance are not adversely affected to the extent that the significance of the vegetation or habitat is reduced.	The EclA (Industrial North - Appendix 23) confirms that the Industrial North Site is highly modified and contains no identified area of significant indigenous vegetation. The Site is, however, considered significant under the WRPS criteria because long-tailed bats (Threatened - Nationally Critical) have been recorded using the wider

	Site. The EclA records comparatively low bat activity and concludes that the Site is unlikely to be important bat habitat relative to other areas of southern Hamilton. The proposal nevertheless adopts a precautionary, species specific management response. Potential bat roost trees will be managed in accordance with DOC roost protocols and bat-sensitive lighting controls will minimise effects on movement and foraging. Bird nesting will be protected through seasonal clearance controls or nest checks; native lizards will be subject to salvage, relocation and habitat enhancement measures; and shortfin eel will be recovered and relocated before works affecting artificial drains. The proposal will also establish additional indigenous habitat through riparian planting, stormwater wetland planting and wider ecological restoration, improving habitat diversity and connectivity within a predominantly exotic and modified environment. The EclA (Industrial North - Appendix 23) concludes that post-management ecological effects range from very low to low and that no significant residual effects remain. Accordingly, the characteristics that give rise to ecological significance are appropriately protected and managed, and the proposal is considered consistent with Policy ECO-P2.
Hazards & Risks	
Objective HAZ-O1 – Natural hazards The effects of natural hazards on people, property and the environment are managed by: 1. increasing community resilience to hazard risks; 2. reducing the risks from hazards to acceptable or tolerable levels; and 3. enabling the effective and efficient response and recovery from natural hazard events.	The Industrial North site is generally low-lying and includes areas subject to flooding during the 1% AEP (100-year) flood event. Flooding is generally concentrated within the existing watercourses, while lower-lying areas outside these features are predominantly subject to shallow sheet flows of approximately 100–300 mm. The proposal incorporates earthworks, flood storage and stormwater management measures to manage this risk and ensure that development does not increase flood hazards on adjoining land. These measures are detailed in the Infrastructure Report (refer to Industrial North - Appendix 13) and Stormwater Management Plan (refer to Industrial North - Appendix 14).

	• The site is also underlain by peat soils and has been assessed for seismicity, fault rupture, liquefaction and settlement. The Geotechnical Investigation Report (refer to Industrial North - Appendix 17) confirms that these risks can be appropriately managed through engineered earthworks, preloading, ground improvement, foundation design and ongoing geotechnical oversight. • The proposed stormwater management approach also takes into account climate change, with future rainfall conditions incorporated into the assessment and design of the stormwater and flood management system. Overall, the proposal does not expose people or property to very high residual natural hazard risk. Identified risks associated principally with flooding, seismicity and peat settlement can be reduced to acceptable or tolerable levels through the proposed engineering and stormwater mitigation measures.
Policy HAZ-P1 – Natural hazard risk management approach Natural hazard risks are managed using an integrated and holistic approach that: 1. ensures the risk from natural hazards does not exceed an acceptable level; 2. protects health and safety; 3. avoids the creation of new intolerable risk; 4. Reduces intolerable risk to tolerable or acceptable levels; 5. enhances community resilience; 6. is aligned with civil defence approaches; 7. prefers the use of natural features over man-made structures as defences against natural hazards; 8. recognises natural systems and takes a ‘whole of system’ approach; and	High impact, low probability hazards have been expressly considered through the geotechnical assessment. This includes seismic shaking, liquefaction, lateral ground movement and slope stability during ultimate limit state earthquake events, together with volcanic, geothermal and other low-probability hazards relevant to the Hamilton setting. The principal high impact risk is associated with seismic effects on peat and shallow Hinuera Formation soils. The Geotechnical Investigation Report (refer to Industrial North – Appendix 17) identifies a high potential liquefaction risk under ULS conditions, but confirms that this can be reduced through preloading, capping with engineer-certified fill, ground improvement and building specific foundation design.

9. seeks to use the best available information/best practice.	
Policy HAZ-P2 – Manage activities to reduce the risks from natural hazards Subdivision, use and development are managed to reduce the risks from natural hazards to an acceptable or tolerable level including by: 1. ensuring risk is assessed for proposed activities on land subject to natural hazards; 2. reducing the risks associated with existing use and development where these risks are intolerable; 3. avoiding intolerable risk in any new use or development in areas subject to natural hazards; 4. minimising any increase in vulnerability due to residual risk; 5. avoiding the need or demand for new structural protection works; and 6. discouraging hard protection structures and promoting the use of alternatives to them, including natural defences in the coastal environment.	Stormwater wetland batters and significant fills are also subject to specific seismic stability requirements, setbacks or flatter slopes where required. Critical infrastructure is designed with resilience in mind, including elevated wastewater pump station platforms, emergency storage and staged servicing. The proposal therefore recognises low probability/high consequence events and incorporates proportionate design measures to protect people, property and infrastructure and support recovery, consistent with HAZ-P3.
HAZ-P3 – High impact, low probability natural hazard events The risks associated with high impact, low probability natural hazard events such as tsunamis, volcanic eruptions, earthquakes and debris flows are considered, having particular regard to: 1. personal health and safety; 2. damage and/or disruption to essential community services; 3. the ability of a community to respond and recover; and 4. civil defence readiness, response and recovery planning.	
HAZ-P4 – Contaminated land Identify and manage contaminated land to ensure human, plant and animal health, and water, air and soil quality are protected from unacceptable risk.	Contaminated land has been identified and assessed through the Detailed Site Investigation (Industrial North - Appendix 21) and the area specific remediation and contaminated soils management plans (Industrial North - Appendix 22). Historical activities include waste and fill placement, storage and transport-related uses, with investigations identifying localised hydrocarbons, elevated metals and variable fill requiring management.

	The proposed remediation framework is risk-based and tailored to the future commercial/industrial use. It provides for controlled earthworks, segregation and testing of suspect material, validation of remediated areas, reuse of suitable soil where appropriate, off-site disposal of contaminated or unsuitable material, dust and stormwater controls, and an Unexpected Discovery Protocol. The plans also address worker protection, equipment decontamination and management of contaminated water where encountered. These measures ensure that contamination is not mobilised or allowed to create unacceptable risk to human health, groundwater, surface water, air, soil ecology or adjoining land. The proposal is therefore consistent with HAZ-P4.
Historical & Cultural Values	
Objective HCV-O1 – Historic and cultural heritage Sites, structures, landscapes, areas or places of historic and cultural heritage are protected, maintained or enhanced in order to retain the identity and integrity of the Waikato region’s and New Zealand’s history and culture.	
HCV-P2 – Relationship of Māori to taonga Recognise and provide for the relationship of tangata whenua and their culture and traditions with their ancestral lands, water, sites, wāhi tapu and other taonga.	The proposal recognises that tangata whenua relationships with ancestral lands, wai, taonga species and the wider cultural landscape extend beyond formally scheduled archaeological or heritage sites. The Cultural Impact Assessment (Industrial North – Appendix 24), prepared on behalf of the SL1 Tangata Whenua Working Group, identifies the wider SL1 area as an interconnected cultural landscape and assesses the proposal through the relationships between wai, whenua, taiao and tangata. Tangata whenua involvement has informed the stormwater, freshwater ecology, ecological restoration and landscape responses. Indigenous and riparian planting, constructed wetlands and habitat restoration provide opportunities to strengthen mauri and reconnect ecological and cultural values within a substantially modified landscape. The proposal also provides for continued tangata whenua involvement in environmental monitoring and implementation of relevant ecological management measures. An Accidental Discovery Protocol and cultural monitoring provisions will manage the possibility of previously unidentified archaeological or cultural material being

	encountered during earthworks. Taken together, these measures recognise and provide for tangata whenua relationships with ancestral lands, water and taonga and are consistent with HCV-P2.
Natural Character	
Objective NATC-O1 – Natural character The natural character of the coastal environment, wetlands, and lakes and rivers and their margins are protected from the adverse effects of inappropriate subdivision, use and development.	The Industrial North site is highly modified by historic and existing land uses and contains an artificial drainage network along the southern and eastern boundaries. Accordingly, the existing natural character values of the site are limited compared with less modified freshwater environments.
Policy NATC-P1 – Preserve natural character Ensure that activities within the coastal environment, wetlands, and lakes and rivers and their margins are appropriate in relation to the level of natural character and: 1. where natural character is pristine or outstanding, activities should avoid adverse effects on natural character; 2. where natural elements/influences are dominant, activities should avoid significant adverse effects and avoid, remedy or mitigate other adverse effects on natural character; 3. where man-made elements/influences are dominant, it may be appropriate that activities result in further adverse effects on natural character, though opportunities to remedy or mitigate adverse effects should still be considered; 4. promote the enhancement, restoration, and rehabilitation of the natural character of the coastal environment, wetlands and lakes and rivers and their margins; and 5. regard is given to the functional necessity of activities being located in or near the coastal environment, wetlands, lakes, or rivers and their margins where no reasonably practicable alternative locations exist.	The proposal will establish new vegetated stormwater wetlands and provide indigenous and riparian planting associated with the existing drainage network. These measures will increase vegetation cover, enhance freshwater and terrestrial habitat and improve the natural character of the drainage corridors within the developed industrial environment. The proposed ecological enhancement measures are detailed in the EclA (Industrial North – Appendix 23), with the wider landscape response detailed in the Landscape Drawings and Design Statement (Industrial North – Appendix 11 and 12). The proposed stormwater management system will also provide treatment and attenuation of stormwater prior to discharge to the receiving environment, supporting the ecological and natural character values of downstream freshwater environments. The stormwater approach is detailed in the Stormwater Management Plan (Industrial North – Appendix 14). Overall, the proposal provides opportunities to enhance the natural character of the existing highly modified drainage environment through wetland establishment, riparian planting and ecological enhancement.
Urban Form & Development	

Objective UFD-O1 – Built environment

Development of the built environment (including transport and other infrastructure) and associated land use occurs in an integrated, sustainable and planned manner which enables positive environmental, social, cultural and economic outcomes, including by:

1. promoting positive indigenous biodiversity outcomes;
2. preserving and protecting natural character, and protecting outstanding natural features and landscapes from inappropriate subdivision, use, and development;
3. integrating land use and infrastructure planning, including by ensuring that development of the built environment does not compromise the safe, efficient and effective operation of infrastructure corridors;
4. integrating land use and water planning, including to ensure that sufficient water is available to support future planned growth;
5. recognising and protecting the value and long-term benefits of regionally significant infrastructure;
6. protecting access to identified significant mineral resources;
7. minimising land use conflicts, including minimising potential for reverse sensitivity;
8. anticipating and responding to changing land use pressures outside the Waikato region which may impact on the built environment within the region;
9. providing for the development, operation, maintenance and upgrading of new and existing electricity transmission and renewable electricity generation activities including small and community scale generation;
10. promoting a viable and vibrant central business district in Hamilton city, with a supporting network of sub-regional and town centres; and
11. providing for a range of commercial development to support the social and economic wellbeing of the region.; and
12. strategically planning for growth and development to create responsive and well-functioning urban environments, that:

The development will achieve the following built environment outcomes that are consistent with Objective UFD-O1:

- SL1 is identified as a priority site for industrial development in Waikato's future development strategy - *the Waikato Future Proof Strategy (2024-2054)* and the RPS Change 1 which gives effect to the future proof strategy and the NPS-UD.
- The *Future Proof Partners Business Development Capacity Assessment 2023* identifies insufficient industrial land and available industrial space in Hamilton City over the medium to long term. The proposal will contribute additional industrial capacity in a location strategically identified for this purpose.
- The development area has also been identified as an 'Emerging Growth Area' by HCC in the Hamilton Urban Growth Strategy (HUGS). SL1 has been identified by HCC and Waipā District Council through a Strategic Land Agreement dated 3 October 2022 as an area intended to become part of Hamilton City, subject to terms to be agreed between the councils. A Memorandum of Understanding between the SL1 Consortium and HCC also establishes an agreed process and timeline to progress the boundary transfer.
- The proposal represents a logical extension of the established Frankton industrial area and will integrate with the existing and planned urban environment, including the Hamilton Southern Links corridor.
- Development is coordinated with infrastructure servicing. New stormwater wetlands and associated infrastructure will be established to manage stormwater quality, quantity and flood risk, while transport improvements will manage the effects of additional

- (a) support reductions in greenhouse gas emissions and are resilient to the current and future effects of climate change;
- (b) improve housing choice, quality, and affordability;
- (c) enable a variety of homes that enable Māori to express their cultural traditions and norms;
- (d) ensure sufficient development capacity, supported by integrated infrastructure provision, for identified housing and business needs in the short, medium and long term;
- (e) improves connectivity within urban areas, particularly by active transport and public transport;
- (f) take into account the values and aspirations of hapū and iwi for urban development.

traffic. The proposed transport improvements include upgrades to local intersections and connections with existing and planned walking and cycling networks. The infrastructure approach is detailed in the Infrastructure Report (**Industrial North – Appendix 13**) and Stormwater Management Plan (**Industrial North – Appendix 14**).

- The proposal will contribute to ecological outcomes through indigenous and riparian planting, enhancement of drainage corridors and the establishment of vegetated stormwater wetlands. Potential effects on indigenous biodiversity will be managed through the EcIA and Ecological Management Plans (**Industrial North – Appendix 23**).
- The proposed stormwater management strategy has been informed by allowance for climate change and incorporates treatment, attenuation and flood-management measures to support a resilient urban environment.
- The proposal will contribute to social and economic wellbeing through increased industrial land and floorspace supply, supporting business growth and employment opportunities within the wider Hamilton urban environment.
- Cultural wellbeing has been recognised through ongoing engagement with tangata whenua and consideration of cultural values in the planning, design and environmental management of the development, as detailed in the Engagement and Consultation Report (**Industrial North Planning Attachment 2**) and Cultural Impact Assessment (**Industrial North – Appendix 24**).

Overall, the proposal will deliver a comprehensively planned industrial environment in a location strategically identified for industrial growth. It integrates land use with infrastructure provision, transport, stormwater management, ecological

	enhancement and cultural values, while providing additional industrial capacity to meet identified demand.
Policy UFD-P1 – Planned and co-ordinated subdivision, use and development Subdivision, use and development of the built environment, including transport, occurs in a planned and co-ordinated manner which: 1. has regard to the principles in APP11; 2. recognises and addresses potential cumulative effects of subdivision, use and development; 3. is based on sufficient information to allow assessment of the potential long-term effects of subdivision, use and development; and 4. has regard to the existing built environment.	The development is coordinated with infrastructure servicing. New wetlands will be built to manage stormwater and transport infrastructure improvements will be undertaken to manage transport effects. The proposed transport improvements target local intersections and key roundabouts and upgrade local cycle and pedestrian paths and crossings. The proposed development delivers a well-planned and considered masterplan for industrial land use that is comprehensively coordinated with infrastructure delivery, land use strategy, and the existing built environment. The proposal is underpinned by a suite of technical assessments that provide a robust understanding of long-term effects and cumulative impacts, consistent with the principles of APP11. The development is located adjacent to the existing Frankton Industrial node, enabling a logical and efficient extension of a key strategic industrial area servicing Hamilton City that is identified in the Future Development Strategy and the RPS to deliver additional industrial floorspace.
Policy UFD-P2 – Co-ordinating growth and infrastructure Management of the built environment ensures: (a) the nature, timing and sequencing of new development is co-ordinated with the development, funding, implementation and operation of transport and other infrastructure, in order to: (b) optimise the efficient and affordable provision of both the development and the infrastructure; (c) maintain or enhance the operational effectiveness, viability and safety of existing and planned infrastructure; (d) protect investment in existing infrastructure; and (e) ensure new development does not occur until provision for appropriate infrastructure necessary to service the development is in place;	The site's development supports integrated and coordinated land use. The development is coordinated with infrastructure servicing. New stormwater wetlands will be built to manage stormwater and transport infrastructure improvements will be undertaken to manage transport effects. The proposed transport improvements target local intersections and key roundabouts and provide connections with existing and planned cycle and pedestrian networks. The proposed industrial development delivers a well-planned and considered masterplan for urban development that is comprehensively coordinated with infrastructure delivery, land use strategy and the existing built environment. The proposal is underpinned by a suite of technical assessments that provide a robust

(f) the spatial pattern of land use development, as it is likely to develop over at least a 30-year period, is understood sufficiently to inform reviews of the Regional Land Transport Plan. As a minimum, this will require the development and maintenance of growth strategies where strong population growth is anticipated or as required for tier 3 local authorities as set out in UFD-P18 and its associated methods; (g) the efficient and effective functioning of infrastructure, including transport corridors, is maintained, and the ability to maintain and upgrade that infrastructure is retained; and (h) a co-ordinated and integrated approach across regional and district boundaries and between agencies; and (i) that where new infrastructure is provided by the private sector, it does not compromise the function of existing, or the planned provision of, infrastructure provided by central, regional and local government agencies.	understanding of long-term effects and cumulative impacts, consistent with the principles of APP11. The development is located adjacent to the existing Frankton industrial area, allowing for a logical and efficient extension of the existing industrial environment that is identified for future industrial development in the <i>Future Proof Strategy 2024–2054</i> and the RPS. The proposal is also coordinated with existing and planned strategic infrastructure, including Hamilton Southern Links. Overall, the proposed Industrial North development represents planned and coordinated urban development that integrates land use with infrastructure provision and has regard to the existing built environment.
Policy UFD-P4 – Energy Demand Management Development should minimise transport, energy demand and waste production, encourage beneficial re-use of waste materials, and promote the efficient use of energy.	The development supports efficient transport and energy use by consolidating additional industrial capacity immediately adjoining the established Frankton industrial area and within the strategically identified Southern Links growth area. This enables employment growth to utilise and reinforce existing and planned strategic transport and three-waters infrastructure rather than establishing a dispersed industrial location with duplicated servicing requirements. The internal transport network provides footpaths and shared walking and cycling facilities connecting with existing and planned active-mode networks, providing future employees with alternatives to private vehicle travel. The proximity of the industrial precinct to planned residential growth within the wider SL1 Growth Cell also improves the spatial relationship between homes and employment and has the potential to reduce travel distances. The proposal also promotes resource efficiency during construction and operation. Suitable excavated and stockpiled material can be reused on Site where it meets

	geotechnical and contamination requirements, while coordinated underground utility corridors and a gravity-based stormwater system reduce operational complexity. These measures are consistent with the direction in Policy UFD-P4 to minimise transport and energy demand and encourage efficient resource use.
UFD-P11 – Adopting Future Proof land use pattern Within the Future Proof area: 1. new urban development shall occur within the Urban and Village Enablement Areas indicated on Map 43 and outlined in Table 341; 2. new residential (including rural-residential) development shall be managed in accordance with the timing indicated on Map 43 or in accordance with the timing provided for within an operative Future Development Strategy for the Future Proof sub-region in accordance with the National Policy Statement on Urban Development 2020); 3. new residential (including rural-residential) development and sensitive activities shall not be located in a strategic industrial node on land either zoned for industrial uses, or deferred industrial uses or identified as a future industrial growth area; 4. new industrial development should predominantly be located in the strategic industrial nodes in Table 34 (APP12) and Map 43 and in accordance with the indicative timings in that table except as set out in clause (8) below; 5. other industrial development should only occur within the Urban Enablement Areas indicated on Map 43, unless there is a need for the industry to locate in the rural area in close proximity to the primary product source. Industrial development in urban areas other than the strategic industrial nodes indicated by Table 34 (APP12) and Map 43 shall be provided for as appropriate in district plans; 6. new industrial development outside the strategic industrial nodes or outside the allocation limits set out in Table 34 and Map 43 shall not	The proposal is considered consistent with Policy UFD-P11. SL1 Industrial North is located within the Hamilton Airport/Southern Links strategic industrial node, where the WRPS and Future Proof Strategy anticipate substantial industrial growth. The relevant strategic framework provides for approximately 94 ha of industrial land from 2020–2030 and a further 46 ha from 2031–2050 within this node. Industrial North will contribute approximately 49.7 ha of industrial land and around 182,000 m² of industrial floorspace, directly supporting that planned growth pattern. The proposal is therefore strongly aligned with clause (4), which directs new industrial development predominantly to identified strategic industrial nodes. It also represents a logical extension of the established Frankton industrial area rather than dispersed industrial development within the wider rural environment. The development is coordinated with existing and planned infrastructure, including Hamilton Southern Links (HSL), three waters infrastructure and upgrades to the surrounding transport network. The HSL designation passes through Industrial North and has directly informed the industrial layout, road hierarchy and future connections, while the proposal is designed to function without relying on HSL being completed from the outset. Clauses (2), (3), (5)–(9) are either not directly applicable or of limited relevance because the proposal is for industrial development within an identified strategic industrial node rather than residential development, an alternative industrial location or airport runway-dependent activity. Overall, SL1 Industrial North gives effect to the Future Proof land-use pattern by concentrating new industrial development within the identified Hamilton

be of a scale or location where the development undermines the role of any strategic industrial node as set out in Table 34 and Map 43; - new industrial development outside the strategic industrial nodes must avoid, remedy or mitigate adverse effects on the transport system, and on other infrastructure; - where alternative urban land release patterns are promoted, either out-of-sequence or unanticipated on Map 43 or in Table 34, including proposals outside of the urban or village enablement areas indicated on Map 43, through district plan and development area processes, justification shall be provided to demonstrate consistency with the principles of the Future Proof land use pattern and particular regard shall be had to the proposed development capacity only where the local authority determines that the urban development proposal is significant, by assessing the proposal for consistency with the operative Future Development Strategy for the Future Proof sub-region and responsive planning criteria in APP13; and where land is required for activities that require direct access to Hamilton Airport runways and where these activities cannot be accommodated within the industrial land allocation in Table 34, such activities may be provided for within other land adjacent to the runways, providing adverse effects on the transport network and other infrastructure are avoided, remedied or mitigated.	Airport/Southern Links strategic industrial node, adjoining the established Frankton industrial area and coordinated with planned strategic infrastructure. It is therefore considered consistent with Policy UFD-P11.
Policy UFD-P13 – Commercial Development in the Future Proof Area Management of the built environment in the Future Proof area shall provide for varying levels of commercial development to meet the wider community’s social and economic needs, primarily through the encouragement and consolidation of such activities in existing commercial centres, and predominantly in those centres identified in Table 37 (APP12). Commercial development is to be managed to: support and sustain the vitality and viability of existing commercial centres identified in Table 37 (APP12);	The SL1 Industrial North development is primarily an industrial development and does not seek to establish a new commercial centre that would compete with the existing commercial centres identified within the Future Proof area. The proposal includes a small food and beverage node, which is intended to provide supporting services for employees and businesses within the Industrial North development rather than function as a standalone commercial centre. The scale and function of this activity is therefore complementary to the proposed industrial

2. support and sustain existing physical resources, and ensure the continuing ability to make efficient use of, and undertake long-term planning and management for the transport network, and other public and private infrastructure resources including community facilities;
3. recognise, maintain and enhance the Hamilton Central Business District as the primary commercial, civic and social centre of the Future Proof area, by:
 - (a) encouraging the greatest diversity, scale and intensity of activities in the Hamilton Central Business District;
 - (b) managing development within areas outside the Central Business District to avoid adverse effects on the function, vitality or amenity of the Central Business District beyond those effects ordinarily associated with trade competition on trade competitors; and
 - (c) encouraging and supporting the enhancement of amenity values, particularly in areas where pedestrian activity is concentrated.
4. recognise that in addition to retail activity, the Hamilton Central Business District and town centres outside Hamilton are also centres of administration, office and civic activity. These activities will not occur to any significant extent in Hamilton outside the Central Business District in order to maintain and enhance the Hamilton Central Business District as the primary commercial, civic and social centre;
5. recognise, maintain and enhance the function of sub-regional commercial centres by:
 - (a) maintaining and enhancing their role as centres primarily for retail activity; and
 - (b) recognising that the sub-regional centres have limited non-retail economic and social activities;
6. maintain industrially zoned land for industrial activities unless it is ancillary to those industrial activities, while also recognising that specific types of commercial development may be appropriately located in industrially zoned land; and

activities and will not detract from the vitality and viability of established commercial centres.

The food and beverage node will also be integrated with the proposed transport and infrastructure networks servicing Industrial North, supporting the efficient use of infrastructure provided for the development.

Overall, the limited commercial component is appropriately scaled to support the immediate Industrial North catchment and is not intended to compete with established centres within the Future Proof area.

7. ensure new commercial centres are only developed where they are consistent with (1) to (6) of this policy. New centres will avoid adverse effects, both individually and cumulatively on: (a) the distribution, function and infrastructure associated with those centres identified in Table 37 (APP12); (b) people and communities who rely on those centres identified in Table 37 (APP12) for their social and economic wellbeing, and require ease of access to such centres by a variety of transport modes; (c) the efficiency, safety and function of the transportation network; and (d) the extent and character of industrial land and associated physical resources, including through the avoidance of reverse sensitivity effects. 8. recognise that in the long term, the function of sub-regional and town centres listed in Table 37 may change.	
Policy UFD-P14 – Rural-residential Development in Future Proof Area Management of rural-residential development in the Future Proof area will recognise the particular pressure from, and address the adverse effects of, rural-residential development in parts of the sub-region, and particularly in areas within easy commuting distance of Hamilton and: 1. the potential adverse effects (including cumulative effects) from the high demand for rural-residential development; 2. the high potential for conflicts between rural-residential development and existing and planned infrastructure and land use activities; 3. the additional demand for servicing and infrastructure created by rural-residential development; 4. the potential for cross-territorial boundary effects with respect to rural-residential development; and 5. has regard to the principles in APP11.	N/A – No residential development is proposed.

Policy UFD-P18 – Tier 3 Local Authority Areas Outside the Future Proof Strategy

New urban development in tier 3 local authority areas shall be managed in a way that:

1. recognises and provides for the intended urban development pattern as set out in any agreed council-approved growth strategy or equivalent council-approved strategies and plans;
2. contributes towards sufficient development capacity required to meet expected demand for housing and for business land over the short term, medium term, and long term as set out in the National Policy Statement on Urban Development;
3. focuses new urban development in and around existing settlements;
4. prevents a dispersed pattern of settlement and the resulting inefficiencies in managing resources that would arise from urban and rural residential development being located in the rural environment outside of identified urban growth areas;
5. avoids the cumulative effect that subdivision and consequent fragmented land ownership can have on the role of identified urban growth areas in providing a supply of land for urban development;
6. ensures that any development is efficient, consistent with, and supported by, appropriate infrastructure necessary to service the area;
7. has particular regard to the principles in APP11;
8. recognises environmental attributes or constraints to development and addresses how they will be avoided or managed including those specifically identified in UFD-M8, high class soils as identified in LF-M41, and planning in the coastal environment as set out in CE-M1;
9. in relation to urban environments:
 - (a) concentrates urban development through enabling heights and density in those areas of an urban environment with accessibility by active or public transport to a range of commercial activities, housing

N/A – Hamilton City Council and Waipa District Council are Tier 1 local authorities¹.

¹ *National Policy Statement on Urban Development 2020 – Updated May 2022*. Appendix: Tier 1 and tier 2 urban environments and local authorities. P. 31.

and community services, and where there is demand for housing and business use; (b) provides for high-quality urban design which responds positively to local context whilst recognising and allowing for amenity values of the urban and built form in areas planned for intensification to develop and change over time, and such change is not, in and of itself, an adverse effect; (c) enables a diverse range of dwelling types and sizes to meet the housing needs of people and communities, including for: i. households on low to moderate incomes; and ii. Māori to express cultural traditions and norms; (d) enables a variety of site sizes and locations in urban environments suitable for different business sectors; (e) supports reductions in greenhouse gas emissions including through providing for an increasingly compact urban form that supports less carbon intensive transport modes such as active and public transport.	
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3.0 Waikato Regional Plan

The following chapters are not considered relevant, and are not assessed:

- Chapter 1 (Approaches to Resource Management) is administrative and does not include objectives and policies.
- Chapter 6 (Air Module) is not relevant to this application as resource consent; the proposal does not include industrial activities which require discharge to air triggering resource consent approval.
- Chapter 7 (Geothermal Module) is not relevant to this application as no activities are proposed in relation to geothermal activities.

Provision	Comment
Chapter 2: Matters of Significance to Māori	

Barker & Associates

+64 375 0900 | admin@barker.co.nz | barker.co.nz

Kerikeri | Whangārei | Warkworth | Auckland | Hamilton | Cambridge | Tauranga | Havelock North | Wellington | Christchurch | Wānaka & Queenstown

2.3 Tangata Whenua Relationship with Natural and Physical Resources

Objective 2.3.2

1. Uncertainty for all parties regarding the relationship between tangata whenua and resources for which they are Kaitiaki minimised.
2. Tangata whenua able to give effect to kaitiakitanga

Extensive engagement with tangata whenua has been undertaken as part of the wider SL1 project through the SL1 Tangata Whenua Working Group, with the outcomes recorded in the Engagement and Consultation Report (**Industrial North Planning Attachment 2**) and Cultural Impact Assessment (**Industrial North – Appendix 24**). The engagement process has enabled tangata whenua to identify their relationships with whenua, wai, taonga species and other natural and physical resources affected by the development, and to inform the planning, design and environmental management response.

The proposal also provides for the ongoing exercise of kaitiakitanga rather than limiting involvement to the consenting stage. In particular, tangata whenua values and mātauranga Māori have informed the approach to freshwater management, ecological restoration, indigenous planting and the management of taonga species. The Cultural Impact Assessment supports continued SL1 Tangata Whenua Working Group involvement in restoration, monitoring and adaptive management, including implementation of relevant ecological management plans.

These measures provide a clear and ongoing framework for tangata whenua participation in decisions affecting resources for which they are kaitiaki and minimise uncertainty regarding those relationships. The proposal is therefore considered consistent with Objective 2.3.2.

Chapter 3: Water Module

3.1 Water Resources

Objective 3.1.2

The management of water bodies in a way which ensures:

- (a) That people are able to take and use water for their social, economic and cultural wellbeing

The proposal is considered consistent with Objective 3.1.2 because it enables the use and development of land and water resources for social and economic wellbeing while incorporating an integrated response to water quality, aquatic ecosystems, groundwater, flood processes and tangata whenua values.

(b) Net improvement of water quality across the Region (c) The avoidance of significant adverse effects on aquatic ecosystems (d) The characteristics of flow regimes are enhanced where practicable and justified by the ecological benefits (e) The range of uses of water reliant on the characteristics of flow regimes are maintained or enhanced (f) The range of uses of water reliant on the characteristics of flow regimes are maintained or enhanced (g) Inefficient use of the available ground surface water resources is minimised (h) An increase in the extent and quality of the Region's wetlands (i) That significant adverse effects on the relationship tangata whenua as Kaitiaki have with water and their identified taonga such as waahi tapu, and native flora and fauna that have customary and traditional uses in or on the margins of water bodies, are remedied or mitigated (j) The cumulative adverse effects on the relationship tangata whenua as Kaitiaki have with water their identified taonga such as waahi tapu, and native flora and fauna that have customary and traditional uses that are in or on the margins of water bodies are remedied or mitigated (k) The management of non-point source discharges of nutrients, faecal coliforms and sediment to levels that are consistent with the identified purpose and values for which the water body is being managed (l) The natural character of the coastal environment, wetlands and lakes and rivers and their margins (including caves), is preserved and protected from inappropriate use and development (m) Ground water quality is maintained or enhanced and ground water takes managed to ensure sustainable yield (n) Shallow ground water takes do not adversely affect values for which any potentially affected surface water body is managed (o) Concentrations of contaminants leaching from land use activities and non-point source discharges to shallow ground water and surface waters	The existing freshwater environment within Industrial North is highly modified and principally comprises artificial farm drains that ultimately discharge to the Waitawhiriwhiri catchment. The proposed stormwater system adopts a Water Sensitive Urban Design and treatment train approach incorporating retention of the initial abstraction volume, source controls, swales, forebays, constructed treatment wetlands, extended detention and controlled discharge. The design targets include 75% total suspended solids removal, attenuation of the 2 year and 10 year events to pre-development discharge rates, and attenuation of the 100 year climate change event to no more than 80% of pre-development discharge. These measures will manage both stormwater quality and quantity before discharge to the receiving environment. The proposal will also provide positive freshwater and ecological outcomes through the establishment and planting of new stormwater wetlands and indigenous and riparian planting associated with the drainage network. These measures will increase habitat and ecological connectivity within a presently modified environment. The EclA (refer to Industrial North – Appendix 23) identifies the artificial watercourses as having negligible to low ecological value and concludes that, following effects management, freshwater effects will be low with no significant residual effects. Fish salvage and relocation will be undertaken before affected drains are reclaimed or diverted. Groundwater effects have also been specifically assessed. The Hydrogeological Assessment (Industrial North – Appendix 20) concludes that construction related effects will be temporary and localised, while operational effects will involve minor localised redistribution rather than a material reduction in catchment groundwater resources. Potential effects associated with groundwater drawdown, mounding and sediment mobilisation will be managed through appropriate construction controls and targeted monitoring.
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do not reach levels that present significant risks to human health or aquatic ecosystems (p) That the positive effects of water resource use activities and associated existing lawfully established infrastructure are recognised, whilst avoiding, remedying or mitigating adverse effects on the environment. (q) Refer to Objective 3.A.1.	The relationship of tangata whenua with wai and their role as kaitiaki has been recognised through engagement undertaken as part of the wider SL1 project, including through the SL1 Tangata Whenua Working Group and the Cultural Impact Assessment (Industrial North – Appendix 24). This engagement has informed the freshwater, ecological and environmental management response and provides for ongoing tangata whenua involvement in relevant restoration and monitoring outcomes. In addition, potable water will be supplied through the approved SL1 Consortium surface water allocation from the Waikato River and associated reticulated infrastructure, rather than through a new water allocation sought as part of the Industrial North application. Overall, the proposal provides for the beneficial use of water resources while appropriately managing effects on water quality, aquatic ecosystems, groundwater and tangata whenua values, and is therefore considered consistent with Objective 3.1.2.
3.2 Management of Water Resources	
Policy 3.2.3.1 Management of Water Bodies Manage all water bodies to enable a range of water use activities, whilst ensuring that a net improvement in water quality across the Region is achieved over time through: (a) Classifying and mapping water bodies based on the characteristics for which they are valued and implementing the classification through a mixture of regulatory and non-regulatory methods. (b) Maintaining overall water quality in areas where it is high, and in other water bodies, avoiding, remedying or mitigating cumulative degradation of water quality from the effects of resource use activities. (c) Enhancing the quality of degraded waterbodies.	The development has been designed to enable planned industrial growth while maintaining and, where practicable, improving the quality and functioning of the receiving freshwater environment. The proposed stormwater management system adopts an integrated treatment train approach comprising retention or soakage of the initial abstraction volume, source controls, grass-lined swales, forebays, constructed treatment wetlands, extended detention and controlled discharge. The system is designed to achieve 75% total suspended solids removal, attenuate the 2 year and 10 year events to pre-development discharge rates, and attenuate the 100 year climate change event to no more than 80% of pre-development discharge. Hydraulic connectivity through the wider drainage network will also be maintained through retained drainage corridors,

- (d) Providing for the mitigation and remediation of adverse effects in accordance with Section 1.3.3 of the Waikato Regional Policy Statement.
- (e) Recognising the positive benefits to people and communities arising from use or development of water resources and by taking account of existing uses of water and the associated lawfully established infrastructure.

swales, culverts and controlled outlets. These measures will manage both stormwater quality and quantity before discharge to the receiving environment.

Compared with the existing highly modified pastoral and industrial environment, the permanent stormwater system will provide a material improvement in the treatment and attenuation of runoff before discharge to the Waitawhiriwhiri catchment. The proposal will also establish vegetated stormwater wetlands and indigenous and riparian planting associated with drainage corridors, providing additional habitat and ecological connectivity within a presently modified environment. Potential effects on aquatic ecosystems and indigenous freshwater species will be managed through the EclA (**Industrial North – Appendix 23**) and associated Ecological Management Plans (**Industrial North – Appendix 23**), with the EclA concluding that post management effects on freshwater values will be low and that no significant residual ecological effects are expected.

Construction related effects on water quality, particularly sediment mobilisation from earthworks, will be managed through erosion and sediment controls implemented in accordance with Waikato Regional Council guidance and the relevant project management plans. This will minimise the discharge of sediment and other contaminants to receiving waters during construction.

The proposal also recognises the positive social and economic benefits associated with the use and development of water resources and supporting infrastructure to enable strategically located industrial development within the wider Southern Links growth area. This is consistent with Policy 3.2.3.1(e), which expressly recognises the benefits to people and communities arising from the use and development of water resources and associated lawfully established infrastructure.

Overall, the proposal provides for industrial development while appropriately managing water quality, aquatic ecosystem and hydraulic effects, and delivering

	opportunities for freshwater enhancement. It is therefore considered consistent with Policy 3.2.3.1.
Policy 3.2.3.2 Manging Degraded Water Bodies Enhance the quality of degraded water through improved management of activities that affect water bodies so that: (a) For activities controlled by rules in the Plan: (i) discharges to water will not further degrade water quality with respect to those parameters of the relevant class(es) for that water body that are not currently met (ii) land-based treatment systems will be promoted where soil type and drainage will allow, and where adverse effects are less than the adverse effects of direct discharges into water (iii) water allocation takes into account the additional adverse effect of reduced flow in degraded waters on aquatic ecosystems and human uses and values. (b) For activities covered by non-regulatory methods in the Plan, promote: (i) land management methods that reduce non-point source discharges (ii) riparian management that mitigates the effect of non-point source discharges on water bodies.	The proposal is considered consistent with Policy 3.2.3.2. Industrial North is located within the wider Waikato River catchment, where maintaining and improving water quality requires careful management of contaminant discharges. The existing freshwater environment within the Site is highly modified, comprising principally artificial farm drains influenced by historic pastoral and industrial land uses. The development therefore provides an opportunity to improve the management and treatment of runoff before it reaches downstream receiving waters. The permanent stormwater system adopts an integrated treatment train and Water Sensitive Urban Design approach, incorporating source controls and retention or soakage of the initial abstraction volume, grass-lined swales, forebays, constructed treatment wetlands, extended detention and controlled discharge. The system is designed to achieve 75% total suspended solids removal, attenuate the 2 year and 10 year events to pre-development discharge rates and attenuate the 100 year climate change event to no more than 80% of the pre-development discharge. Together, these measures will reduce sediment and contaminant loads and manage both the quality and quantity of stormwater before it enters the downstream receiving environment. The change in land use will also remove existing sources of diffuse contaminant input associated with pastoral activity, including stock access and associated nutrient and stock-effluent inputs to the artificial drainage network. In their place, the proposal will establish vegetated stormwater wetlands and indigenous and riparian planting associated with the drainage corridors. These measures will provide additional treatment and filtration functions while improving habitat and ecological connectivity within the presently modified freshwater environment.

	Construction related effects are also specifically addressed. Given the scale of earthworks required, staged erosion and sediment controls will be implemented in accordance with Waikato Regional Council guidance and the relevant project management plans to minimise the discharge of sediment and other contaminants during construction. The EclA (refer to Industrial North – Appendix 23) concludes that, following implementation of the proposed effects management measures, effects on catchment waterways will be low and no significant residual ecological effects are anticipated. Overall, the proposal will avoid further degradation of receiving waters through comprehensive stormwater treatment and construction controls, while the removal of existing pastoral contaminant sources and establishment of vegetated wetlands and riparian planting provide opportunities to improve water-quality and ecological outcomes within the receiving catchment. The proposal is therefore considered consistent with Policy 3.2.3.2.
Policy 3.2.3.3 Natural Character Recognise, and where relevant provide for, the following characteristics when considering the preservation of the natural character of lakes and rivers and their margins and the protection of them from inappropriate use and development: (a) Diversity and composition of aquatic and riparian habitat. (b) Topography and physical composition of river and lake beds and the course of the river. (c) The natural flow characteristics and hydraulic processes (such as sediment transport) of rivers and streams or the pattern and range of water level fluctuations that occur naturally in rivers and lakes. (d) Any significant natural features of the lakes and rivers and their margins.	The Industrial North site is a highly modified rural industrial edge. Natural character is limited and fragmented and is primarily associated with artificial drains, ponded water, pasture and scattered vegetation rather than intact natural freshwater systems. No natural inland wetlands have been identified within the Site. The proposal will replace parts of this modified environment with a deliberately designed blue-green framework comprising constructed stormwater wetlands, swales, planted margins and indigenous/riparian vegetation. Although the drainage system will become more engineered, the new wetlands and planting will increase the expression of water and indigenous vegetation, provide habitat, and improve the legibility and amenity of freshwater features within the developed industrial environment. Hydraulic connectivity and external catchment flows will be maintained through retained drainage corridors, diversion channels, culverts and controlled outlets.

	Stormwater will be treated and attenuated before discharge, while fish salvage and relocation measures will manage effects where artificial drains are reclaimed or diverted. The Landscape and Visual Assessment (refer to Industrial North – Appendix 12) also identifies the existing natural character as low and modified and concludes that the overall landscape effects of the development are low adverse (less than minor). Having regard to the existing level of modification and the proposed restoration, treatment and connectivity measures, the proposal appropriately recognises the natural character characteristics identified in Policy 3.2.3.3 and is considered consistent with the policy.
Policy 3.2.3.4 Waikato Region Surface Water Class Enable the use of all surface water bodies in the Region, provided that: (a) Any significant adverse effects on existing aquatic ecosystems are avoided, remedied or mitigated. (b) Intake structures are designed to minimise fish entrapment. (c) Any conspicuous change in visual colour or clarity is avoided, remedied or mitigated. (d) The water body is not tainted or contaminated to the extent that it is unpalatable or unsuitable for consumption by humans after treatment (equivalent to coagulation, filtration and disinfection). (e) The water body is not tainted or contaminated to the extent that it is unsuitable for irrigation or stock watering.	Policy 3.2.3.4 is not directly engaged as the Industrial North application does not seek a surface-water take or other use of a surface water body under this provision. Stormwater discharges, drain reclamation/diversion and associated freshwater effects are instead addressed under the specific discharge, damming/diversion and ecological provisions assessed elsewhere in this table. Those assessments demonstrate that significant adverse effects on aquatic ecosystems will be avoided or appropriately managed and that water-quality effects will be treated before discharge.
3.3 Water Takes	
Objective 3.3.2 (a) Giving effect to the overarching purpose of the Vision and Strategy to restore and protect the health and wellbeing of the Waikato River for present and future generations. (b) The availability of water to meet the existing and the reasonably justified and foreseeable future domestic or municipal supply requirements of	Objective 3.3.2 is not directly engaged because the Industrial North application does not seek a new surface water or groundwater take. A separate surface water take from the Waikato River has already been approved for the SL1 Consortium, including Industrial North, to support potable water supply through the reticulated network (refer to Industrial North – Appendix 30).

individuals and communities and the reasonable needs for an individual's animal drinking water requirements. (c) The recognition of the significant community benefits that derive from domestic or municipal supply takes. (d) The efficient allocation and the efficient use of water. (e) No further allocation of water that exceeds the primary allocation in Table 3-5 that reduces the generation of electricity from renewable energy sources. (f) The recognition that existing water takes contribute to social and economic wellbeing and in some cases significant investment relies on the continuation of those takes, including rural-based activities such as agriculture, perishable food processing and industry. (g) The continued availability of water for cooling of the Huntly Power Station. (h) Sufficient water is retained instream to safeguard the life supporting capacity of freshwater, including its ecosystem processes and indigenous species and their associated ecosystems. (i) That decisions regarding the allocation and use of water take account of the need to avoid the further degradation of water quality, having regard to the contaminant assimilative capacity of water bodies. (j) Subject to Objectives a) to h) above, the availability of water to meet other future social, economic and cultural needs of individuals and communities (including rural-based activities such as agriculture, perishable food processing and industry). (k) Refer to Objective 3.A.1.	The approved take is subject to its own allocation, efficiency and water-management requirements. Industrial North will therefore rely on an existing approved allocation rather than creating additional allocation pressure through this application. In that context, the proposal is not inconsistent with Objective 3.3.2.
3.3 Efficient Use of Water	
Policy 3.4.3.1 Manage the Use of Water Manage, through permitted activities and resource consents, the use of water, any associated discharge of water onto or into land in a manner that ensures that:	The policy is relevant principally as context because no new water take is sought through this application. Potable water for Industrial North will be supplied through the separately approved SL1 Consortium surface water take from the Waikato River and associated reticulated network. That authorised take is subject to a Water

(a) The overarching purpose of the Vision and Strategy to restore and protect the health and wellbeing of the Waikato River for present and future generations is given effect to (b) The further degradation of water quality is avoided (c) Any adverse changes to natural flow regimes are avoided as far as practicable and otherwise mitigated (d) Adverse effects on the relationship tangata whenua as Kaitiaki have with water are avoided, remedied or mitigated (e) Adverse effects on in-stream ecological values are avoided, remedied or mitigated (f) Adverse effects on wetlands that are habitats for significant indigenous vegetation and significant habitats for indigenous fauna are avoided, remedied, or mitigated (g) Adverse effects on groundwater quality are avoided as far as practicable and otherwise mitigated (h) Does not result in an adverse effect relating to the objectives in Chapter 5.2 of this plan (i) The benefits to be derived from the efficient take and use of water for reasonably foreseeable future uses, and in particular for domestic or municipal supply, are maintained and/ or enhanced.	Management Plan and consent conditions addressing the efficient use and management of the allocated water resource. The water related activities forming part of the Industrial North proposal have also been designed to protect the receiving environment. Stormwater will be managed through an integrated treatment train approach incorporating source controls, retention or soakage of initial abstraction, swales, forebays, constructed treatment wetlands, extended detention and controlled discharge. This will manage both the quality and quantity of runoff before discharge to the downstream receiving environment. The Hydrogeological Assessment (refer to Industrial North – Appendix 20) also confirms that construction related groundwater effects will be temporary and localised, while operational effects will comprise minor localised redistribution rather than any material long term reduction in catchment groundwater resources. Potential groundwater effects will be managed through appropriate construction practices and targeted monitoring. The relationship of tangata whenua with wai and their role as kaitiaki has also informed the project through engagement with the SL1 Tangata Whenua Working Group and preparation of the Cultural Impact Assessment (refer to Industrial North – Appendix 24), including the development of the freshwater, ecological and environmental management response. Accordingly, the proposal does not seek any additional allocation of freshwater and incorporates measures to avoid further degradation of water quality and appropriately manage effects on freshwater ecosystems, groundwater and tangata whenua values. It is therefore considered consistent with the intent of Policy 3.4.3.1.
Policy 3.4.3.2 Efficient Use of Water Ensure the efficient use of water by: (a) Requiring the amount of water taken and used to be reasonable and justifiable with regard to the intended use and where appropriate:	Policy 3.4.3.2 is not directly engaged by a new take because no additional water allocation is sought as part of Industrial North. The development will rely on the separately approved SL1 Consortium surface water take from the Waikato River and the associated Water Management Plan (refer to Industrial North – Appendix 30),

(i) For domestic or municipal supplies is justified by way of a water management plan. (ii) For industry, implementation of industry good practice, in respect of the efficient use of water for that particular activity/industry. (iii) For irrigation, the following measures in relation to the maximum daily rate of abstraction, the irrigation return period and the seasonal or annual volume of the proposed take: - A maximum seasonal allocation reliability of up to 9 out of 10 years - A minimum application efficiency of 80 percent (even if the actual system being used has a lower application efficiency), or on the basis of a higher efficiency where an application is for an irrigation system with a higher efficiency (b) Requiring consideration of water conservation and minimisation methods, such as leak detection and loss monitoring as integral parts of water take and use consent applications to ensure no significant wastage of water resources (c) Raising awareness amongst the regional community about water efficiency issues and techniques (d) Facilitating the transfer of water take permits, provided the transfer does not result in effects that are inconsistent with the purpose of the relevant Water Management Class, as identified by the policies in Section 3.2.3 and the water classes in Section 3.2.4 (e) Promoting investigation of alternatives to the water take, alternative water sources, water harvesting (excluding the Waikato River catchment above Karapiro Dam) and seasonal storage, as an integral part of water take and use consent applications. (f) Promoting shared use and management of water through water user groups or other arrangements where there is increased efficiency in the use and allocation of water.	which provides the framework for efficient use, conservation and monitoring of the authorised supply. The staged servicing strategy also makes use of existing and planned reticulated infrastructure rather than establishing a separate project-specific abstraction. On that basis, the proposal is considered consistent with the efficient-use intent of Policy 3.4.3.2.
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3.5 Discharges

Objective 3.5.2 Discharges of contaminants to water undertaken in a manner that: (a) does not have adverse effects that are inconsistent with the water management objectives in Section 3.1.2 (b) does not have adverse effects that are inconsistent with the discharges onto or into land objectives in Section 5.2.2 (c) Ensures that decisions regarding the discharge of contaminants to water do not reduce the contaminant assimilative capacity of the water body to the extent that allocable flows as provided for in Chapter 3.3 are unable to be utilised for out of stream uses.	The proposal is considered consistent with Objective 3.5.2. Stormwater generated by the industrial development will be managed through a comprehensive treatment and attenuation system before discharge to land, the existing drainage network and the wider Waitawhiriwhiri catchment. The Stormwater Management Plan (refer to Industrial North – Appendix 14) adopts a treatment train approach incorporating initial abstraction/retention, source controls, swales, forebays, constructed wetlands, extended detention and controlled discharge. The design targets 75% total suspended solids removal, attenuation of the 2 year and 10 year events to pre-development rates and attenuation of the 100 year climate change event to no more than 80% of pre-development discharge. These measures will reduce contaminant loads and manage both water-quality and water-quantity effects associated with the increase in impervious area. Construction discharges will be managed through staged erosion and sediment controls in accordance with Waikato Regional Council guidance. The EclA (refer to Industrial North – Appendix 23) concludes that post management effects of stormwater discharge on catchment waterways will be low. Wastewater will be discharged to the reticulated wastewater network rather than directly to water. Groundwater interactions have also been assessed, with the Hydrogeological Assessment (refer to Industrial North – Appendix 20) concluding that effects will be temporary/localised during construction and minor during operation, with no material long term reduction in catchment groundwater resources. Overall, the proposed discharges will not give rise to effects inconsistent with the water-management objectives.
Policy 3.5.3.1 Enabling Discharges to Water that will have only Minor Adverse Effects Enable through permitted and controlled activity rules, discharges to water that due to their nature, scale and location will:	This policy is of limited relevance to SL1 Industrial North because it principally provides for discharges to water that can be enabled through permitted or controlled activity rules. The principal operational stormwater discharges from SL1 Industrial

(1) avoid adverse effects on surface water bodies that are inconsistent with policies in Section 3.2.3 of this Plan (2) not increase the adverse effects of flooding or erosion on neighbouring properties (3) ensure that any adverse effects of sediment on aquatic habitats are confined to a small area relative to the habitat as a whole or are temporary, and the area will naturally re-establish habitat values comparable with those prevailing before commencement of the activity (4) not result in significant effects on the Coastal Marine Area as identified in the Waikato Regional Coastal Plan, wetlands¹⁸ that are areas of significant indigenous vegetation and/or significant habitats of indigenous fauna, cave ecosystems or lakes (5) not have adverse effects that are inconsistent with the policies for air quality provided in Section 6.1.3 of this Plan.	North require discretionary activity consent under Rule 3.5.11.8 due to the scale and nature of the proposed catchment. Notwithstanding this, the proposal is consistent with the environmental outcomes sought by the policy. The stormwater system incorporates source controls, swales, forebays, constructed treatment wetlands, detention and controlled discharge to manage both stormwater quality and quantity and minimise effects on downstream water bodies. Construction related sediment effects will also be managed through staged erosion and sediment controls. The Ecological Impact Assessment (refer to Industrial North – Appendix 23) identifies the receiving artificial drainage network as having negligible to low ecological value and concludes that, following management, freshwater effects will be low or very low with no significant residual effects. Overall, while Policy 1 is not the primary policy applying to the consented stormwater discharges, the proposal is consistent with its underlying direction to avoid or minimise adverse effects on water quality, flooding, erosion and aquatic habitat.
Policy 3.5.3.2 Managing Discharges to Water with More than Minor Adverse Effects Control, through resource consents, discharges to water that are likely to have more than minor adverse effects so that: (1) adverse effects on surface water bodies that are inconsistent with the policies in Section 3.2.3 of this Plan are avoided as far as practicable and otherwise remedied or mitigated (2) the discharge causes no significant adverse effects from flooding or erosion (3) there are no significant adverse effects from downstream siltation	Policy 2 is directly relevant because the principal operational stormwater discharges from SL1 Industrial North require resource consent. The policy provides the relevant management framework for discharges that are not enabled through the permitted or controlled activity provisions. The proposed stormwater system has been specifically designed to manage effects on the receiving environment through an integrated treatment train comprising retention or soakage of initial runoff, source controls, grass-lined swales, forebays, constructed treatment wetlands, extended detention and controlled discharge. The system is designed to achieve 75% total suspended solids removal, attenuate the 2 year and 10 year events to pre-development discharge rates, and attenuate the 100 year climate-change event to no more than 80% of the pre-development discharge.

(4) there are no significant adverse effects on the Coastal Marine Area, wetlands¹⁹ that are areas of significant indigenous vegetation and/or significant habitats of indigenous fauna, cave ecosystems or lakes (5) any subsequent discharges to air do not have adverse effects that are inconsistent with the policies for air quality provided in Section 6.1.3 of this Plan.	These measures address the policy requirements relating to water quality, flooding, erosion and downstream sedimentation. The receiving freshwater environment has also been specifically considered. The Site contains a highly modified artificial drainage network rather than natural streams or natural inland wetlands, with the artificial watercourses assessed as having negligible to low ecological value. Fish salvage and relocation will occur before affected drains are reclaimed or diverted, fish passage will be provided where required, and indigenous and riparian planting around the constructed wetlands and drainage corridors will provide additional freshwater habitat. Construction related water-quality effects will be managed through erosion and sediment controls in accordance with Waikato Regional Council guidance, while the permanent stormwater system is expected to provide a substantial improvement in the treatment and attenuation of runoff compared with the existing modified pastoral and industrial environment. Overall, the proposal is considered consistent with Policy 2. The stormwater system has been designed to avoid, remedy and mitigate adverse effects on water quality, flooding, erosion, downstream sedimentation and freshwater ecological values, with the supporting assessments concluding that no significant residual freshwater ecological effects are expected.
Policy 3.5.3.4 Discharges to Land Ensure that the discharge of contaminants onto or into land maximises the reuse of nutrients and water contained in the discharge.	The proposal includes land based management of stormwater through retention and soakage where appropriate, including retention of the initial abstraction volume and soakage via roadside swales and/or unlined wetland systems where ground conditions allow. The balance of runoff is conveyed through the treatment train to constructed wetlands and controlled outlets. Policy 3.5.3.4 is principally directed toward discharges containing nutrients or water capable of beneficial reuse. Industrial stormwater is not a nutrient rich discharge for which nutrient recovery is relevant. Nevertheless, the proposed approach makes

	beneficial use of land-based retention and infiltration to reduce runoff volumes and support groundwater recharge where practicable, rather than relying solely on direct discharge to surface water. This is consistent with the intent of the policy.
Policy 3.5.3.5 Ground Water Minimise the adverse effects of discharges onto or into land on ground water quality by ensuring that they: (a) do not compromise existing or reasonably foreseeable uses of ground water (b) avoid adverse effects on surface water bodies that are inconsistent with the policies in Section 3.2.3 of this Plan as far as practicable and otherwise, remedy or mitigate those effects (c) are not inconsistent with the policies in Section 3.8.3 that manage the effects of drilling and discharges associated with drilling on ground water quality.	Stormwater discharged to land will be managed through an integrated treatment train incorporating source controls, retention or soakage, swales, forebays, constructed wetlands, attenuation and controlled discharge. Treatment prior to infiltration or discharge will reduce the potential for contaminants from industrial lots and roads to enter shallow groundwater or connected surface waters. The Hydrogeological Assessment (refer to Industrial North – Appendix 20) confirms a shallow groundwater system within the peat overlying the Hinuera Formation and specifically assesses construction drawdown and operational interactions with the proposed wetlands. It concludes that construction related groundwater effects will be temporary and localised, operational effects will comprise minor localised redistribution rather than a material reduction in catchment groundwater resources, and no effects on nearby bores or surface water features are expected. Potential drawdown, mounding and sediment mobilisation will be managed through standard construction practices, erosion and sediment controls and targeted monitoring. Contaminated soils are separately managed through the remediation framework so that existing contamination is not mobilised into groundwater during earthworks. Overall, the proposal will not compromise existing or reasonably foreseeable groundwater uses and will minimise potential effects on groundwater quality and connected surface-water bodies, consistent with Policy 3.5.3.5.
Policy 3.5.3.6 Tangata Whenua Uses and Values Ensure that the relationship of tangata whenua as Kaitiaki with water is recognised and provided for to avoid significant adverse effects and remedy or mitigate cumulative adverse effects on: (a) the mauri of water	The relationship of tangata whenua as kaitiaki with water has been a substantive component of the wider SL1 planning process. Engagement has occurred through the SL1 Tangata Whenua Working Group and is documented in the Engagement and Consultation Report (Industrial North Planning Attachment 2) and Cultural Impact Assessment (Industrial North- Appendix 24). The Cultural Impact Assessment

(b) waahi tapu sites (c) other identified taonga.	considers wai, whenua, taiao and tangata as an interconnected cultural landscape and has reconciled the technical stormwater, ecological and hydrogeological responses through a cultural lens. The proposal responds through a treatment train stormwater system intended to improve water quality, manage contaminant loads and support the mauri of receiving waters, together with indigenous/riparian planting and ecological restoration. The Cultural Impact Assessment also supports ongoing tangata whenua involvement in implementation, monitoring and adaptive management, including opportunities relating to freshwater fish salvage and habitat restoration. These measures provide for the relationship of tangata whenua with wai, mauri and taonga through both project design and ongoing management. The proposal is therefore considered consistent with Policy 3.5.3.6.
Policy 3.5.3.7 Stormwater Discharges Encourage at-source management and treatment of stormwater discharges to reduce water quality and water quantity effects of discharges on receiving waters.	The proposal directly implements the at-source management approach promoted by Policy 3.5.3.7. The stormwater system uses a treatment train beginning with retention or soakage of the initial abstraction volume and source controls on lots and roads, followed by grass-lined swales, forebays, constructed treatment wetlands, extended detention and controlled discharge. The design targets 75% total suspended solids removal and provides extended detention of the water-quality volume. The 2 year and 10 year events will be attenuated to pre-development discharge rates, while the 100 year climate change event will be attenuated to no more than 80% of pre-development discharge. Existing external catchment flows will continue to be conveyed through the Site using retained drainage corridors, diversion channels, culverts and the road network so that hydraulic connectivity is maintained. This approach treats runoff close to source, reduces contaminant loads and peak flows before they reach the wider drainage network, and provides additional

	treatment and ecological functions through the vegetated wetlands. It is therefore strongly consistent with Policy 3.5.3.7.
3.6 Damming and Diverting	
Objective 3.6.2 Damming and/or diverting of water undertaken in a manner that: (a) Does not have adverse effects that are inconsistent with the water management objectives in Section 3.1.2. (b) Does not have adverse effects that are inconsistent with the river and lake bed structures objectives in Section 4.2.2. (c) Does not obstruct fish passage where it would otherwise occur in the absence of unnatural barriers, so that trout or indigenous fish can complete their lifecycle. (d) Results in no increase in the adverse effects of flooding or land instability hazards. (e) Results in no loss of existing aquatic habitats as a consequence of channelisation of rivers. (f) Increases the use of off-stream dams for water supply purposes as an alternative to dams in perennial streams. (g) ensures that decisions regarding the damming and diverting of water take account of the consequent loss of water quality and any associated reduction in contaminant assimilative capacity, minimum flows and allocable flows for out of stream uses as provided by Section 3.3.3 Policy 1 and Table 3-5 of Chapter 3.3. (h) Refer to Objective 3.A.1.	The proposal includes the diversion and reclamation of parts of the existing artificial farm drain network and the construction of stormwater wetlands, culverts, swales and associated conveyance infrastructure. These works have been comprehensively designed as an integrated stormwater system to maintain hydraulic connectivity through the Industrial North Site while managing post-development flows, water quality, aquatic ecology and flood risk. The proposed approach is detailed in the Infrastructure Report (Industrial North – Appendix 13) and Stormwater Management Plan (Industrial North – Appendix 14). Hydraulic connectivity and external catchment flows will be maintained through retained drainage corridors, diversion channels, culvert crossings, swales and road based overland flow paths. The constructed stormwater wetlands will provide water quality treatment, extended detention, attenuation and flood storage before controlled discharge to the receiving environment. The system is designed to attenuate the 2 year and 10 year events to pre-development discharge rates and the 100 year climate change event to no more than 80% of the pre-development discharge, thereby ensuring that the development does not increase downstream flood risk. Potential effects on aquatic ecosystems have also been specifically assessed. The EclA (Industrial North – Appendix 23) confirms that the affected waterways comprise artificial farm drains of negligible to low ecological value, with shortfin eel being the only fish species recorded within Industrial North. Effects associated with reclamation and diversion of these drains will be managed through the Ecological Management Plans (Industrial North – Appendix 23), including fish salvage and relocation prior to works. Culverts and crossings will also provide for fish passage where required.

	Importantly, no natural inland wetlands have been identified within the Industrial North Site, and the proposed stormwater wetlands will establish new vegetated aquatic and riparian habitat within the presently highly modified environment. Overall, the proposed diversions and associated stormwater works will maintain catchment and drainage function, appropriately manage effects on freshwater habitat and indigenous fish, and avoid increasing downstream flooding effects. The proposal is therefore considered consistent with Objective 3.6.2.
Policy 3.6.3.1 Off-Stream Dams and Dams or Diversions on Ephemeral Systems Enable through permitted activity rules the use of off-stream dams, or dams and diversions on ephemeral streams where: (a) Adverse effects on surface water bodies that are inconsistent with the policies in Section 3.2.3 of this Plan are avoided. (b) The use, erection, reconstruction, placement, alteration or extension of structures on the beds of lakes or rivers associated with the activity avoid adverse effects that are inconsistent with the policies in Section 4.2.3. (c) The damming and diversion does not increase the adverse effects of flooding or erosion on neighbouring properties. (d) Changes in the catchment and sediment transport processes have no significant adverse effects on water quality, aquatic habitat and flow regimes in perennial streams. (e) Any significant adverse effect on cave systems are avoided or mitigated. (f) Any adverse effects on wetlands that are areas of significant indigenous vegetation and/or significant habitats of indigenous fauna are avoided, remedied or mitigated in accordance with Policies 1 and 2 of Chapter 3.7. (g) Existing legal public access to and along lakes and rivers is maintained where appropriate.	This policy is not applicable because the proposal does not include construction of an off-stream dam or dam on an ephemeral stream. The constructed stormwater wetlands are treatment and attenuation devices rather than water supply dams. Diversion and reclamation of the existing artificial farm drains are addressed under Objective 3.6.2 and the relevant resource consent provisions.
Policy 3.6.3.3 Tangata Whenua Uses and Values	The relationship of tangata whenua as kaitiaki with water has been recognised through the SL1 Tangata Whenua Working Group and the Cultural Impact Assessment

Ensure that the relationship of tangata whenua as Kaitiaki with water is recognised and provided for, to avoid significant adverse effects and remedy or mitigate cumulative adverse effects on: (a) the mauri of water, (b) waahi tapu sites, (c) other identified taonga.	(Industrial North – Appendix 24). The cultural assessment treats wai, whenua, taiao and tangata as interconnected and has informed the approach to stormwater, freshwater ecology, restoration and the management of taonga species. For the proposed drain diversions and reclamation works, the Fish Management Plan provides for salvage and relocation of indigenous freshwater fish, with the Cultural Impact Assessment supporting ongoing tangata whenua involvement in implementation and monitoring where practicable. The wider stormwater and restoration strategy is intended to improve water quality, strengthen mauri and provide additional indigenous habitat within the developed Site. Accordingly, the diversion works are accompanied by measures that recognise and provide for tangata whenua relationships with wai and taonga and are considered consistent with Policy 3.6.3.3.
Policy 3.6.3.4 Wetlands and Peat Lakes Enhance or maintain the extent and quality of the Region’s wetlands by encouraging activities that will either maintain or reinstate agreed water levels in wetland areas or peat lakes.	The EclA (Industrial North – Appendix 23) confirms that no natural inland wetlands are present within the Industrial North Site. The existing freshwater features are artificial farm drains and constructed/modified water features rather than natural wetlands for the purposes of the relevant freshwater provisions. The proposal will nevertheless establish three new vegetated stormwater wetlands as part of the treatment and attenuation system. These constructed wetlands will increase the extent of wetland type habitat within the Site and will be complemented by indigenous and riparian planting. While Policy 3.6.3.4 is therefore not directly engaged in relation to an existing natural wetland or peat lake, the proposal is consistent with its broader enhancement intent.
3.7 Wetlands	
Policy 3.7.3.1 Control Land Drainage in Areas Adjacent to Identified Wetlands and Within Wetlands Ensure that land drainage activities within wetlands that are areas of significant indigenous vegetation and/or significant habitats of indigenous	The EclA (Industrial North – Appendix 23) confirms that there are no natural inland wetlands within the Industrial North Site and no identified wetland listed in Section

fauna, or immediately adjacent to wetlands identified in Section 3.7.7, are undertaken in a manner that avoids changes in water level that lead to: (a) shrinking or loss of the wetland, or (b) accelerated dewatering and oxidation, or (c) significant adverse effects on tangata whenua values of the wetland, or (d) adverse effects of flooding on neighbouring properties, or (e) significant adverse effects on the relationship tangata whenua as Kaitiaki have with the wetland, or (f) adverse effects on the natural character of wetlands or (g) adverse effects on the ability to use the wetlands for recreational purposes (h) and remedy or mitigate otherwise.	3.7.7 is affected by the proposed drainage works. Policy 3.7.3.1 is therefore not directly engaged. Groundwater and drainage effects have nevertheless been assessed because of the peat soils and shallow groundwater conditions. The Hydrogeological Assessment (Industrial North – Appendix 20) concludes that construction related drawdown will be temporary and localised and that operational wetland effects will involve only minor localised groundwater redistribution. Targeted monitoring and construction controls are proposed. The development also introduces constructed vegetated stormwater wetlands and associated planting, increasing wetland-type habitat within the Site.
Drilling	
Objective 3.8.2 Drilling activities undertaken in a manner that: (a) is consistent with the objectives in Section 3.1.2, (b) is consistent with the objectives in section 5.2.2, (c) prevents significant adverse effects from the mixing of previously isolated aquifers, (d) does not result in significant adverse effects from a loss of aquifer pressure/level, (e) is consistent with the objectives in Section 7.2.2, (f) does not result in blow-outs in geothermal wells.	The proposal is considered consistent with Objective 3.8.2. Drilling below the water table may be required for temporary dewatering associated with the construction of stormwater wetlands, wastewater pipelines, wastewater pump stations and other below ground infrastructure. The proposed drilled installations will be constructed, operated and abandoned so as to prevent leakage and cross-contamination between groundwater layers, with appropriate construction materials used and drilling records provided to Waikato Regional Council. The wider hydrogeological and geotechnical assessments have also considered groundwater conditions and the effects of temporary dewatering, with groundwater and settlement monitoring and associated management measures proposed to manage changes in groundwater levels. The drilling activities are temporary construction activities and do not involve geothermal wells or geothermal resources. Overall, the drilling required for Industrial North can be undertaken in a controlled manner that protects groundwater quality, avoids significant cross-contamination

	between groundwater layers and manages effects on groundwater levels. The proposal is therefore considered consistent with Objective 3.8.2.
Policy 1: Effects of Drilling Activities Manage the effects of drilling and any associated discharges in a manner that avoids significant adverse effects on the quality of ground water, surface water and soils from: (a) contamination by drilling fluids, (b) contamination of ground water by contaminants in surface water, (c) mixing of previously isolated aquifers, (d) loss of aquifer pressure/level, (e) disturbance of waahi tapu and other identified sites of significance to tangata whenua as Kaitiaki, (f) inappropriate drilling in geothermal systems.	The proposal is considered consistent with Policy 1. Any drilling fluids associated with geotechnical investigations, foundation works or temporary dewatering wells will be contained and discharged to land where contaminants cannot enter surface water. Freshwater or air based drilling fluids and permitted non hazardous additives will be used. Drilled installations extending below the water table will also be designed, constructed and abandoned to prevent leakage and cross-contamination between groundwater layers and to appropriately manage groundwater pressure and level effects. Potential effects on waahi tapu and other culturally significant features are addressed through the Cultural Impact Assessment (refer to Industrial North – Appendix 24), which recommends ongoing involvement of the SL1 Tangata Whenua Working Group, a Cultural Landscape and Waahi Tapu Assessment, an Accidental Discovery Protocol and an Archaeological Site Management Plan. No drilling into geothermal water or near a Significant Geothermal Feature is proposed. Overall, the proposed drilling activities incorporate appropriate controls to avoid significant adverse effects on groundwater, surface water, soils and cultural values and are therefore considered consistent with Policy 1.
Chapter 5: Land and Soil Module	
5.1 Accelerated Erosion	
Objective 5.1.2 A net reduction of accelerated erosion across the Region so that: (a) soil productivity, versatility and capability is maintained	The proposal involves substantial bulk earthworks and therefore directly engages the accelerated erosion provisions. The earthworks will be undertaken in accordance with the Waikato Regional Council Guidelines for Soil Disturbing Activities (TR2009/02 or current applicable guidance), the Earthworks Management Plan and Construction

(b) there are no adverse effects on water quality, aquatic ecosystems and wetlands that are inconsistent with Water Management Objective 3.1.2 (c) there is no increase in the adverse effects of flooding or land instability hazards (d) accelerated infilling of lakes, estuaries, rivers, wetlands and cave systems is avoided and the rate of infilling of artificial watercourses, excluding structures designed to trap sediment, is minimised (e) significant adverse effects on the relationship tangata whenua as Kaitiaki have with their identified ancestral taonga such as ancestral lands, water and waahi tapu are avoided (f) cumulative adverse effects on the relationship tangata whenua as Kaitiaki have with their identified taonga such as ancestral lands, water, waahi tapu are remedied or mitigated. (g) significant adverse effects on natural character and ecological values associated with land and the coastal environment including dune systems is avoided (h) there are no adverse effects on air quality that are inconsistent with Air Quality Objective 6.1.2, Objectives 2 and 3 (i) damage to property and infrastructure is avoided	Management Plan (Industrial North – Appendix 31), with detailed erosion and sediment control measures established and maintained throughout each stage of works. The principal erosion related risk is mobilisation of fine sediment from exposed earthworks into the artificial drainage network and downstream receiving waters. Controls will be staged to the active earthworks footprint and will include appropriate clean water diversion, sediment retention/treatment, stabilised access and progressive stabilisation, with a pre-construction meeting and ongoing monitoring to confirm measures are appropriate to site conditions. The EclA (refer to Industrial North – Appendix 23) records that, with appropriate erosion and sediment controls, construction effects on freshwater water quality and habitat will be low. The permanent stormwater system will also assist by formalising conveyance, attenuating runoff and maintaining external catchment flow paths, reducing the potential for erosion, flooding and instability following development. Potential cultural and ecological effects are addressed through the Cultural Impact Assessment (refer to Industrial North – Appendix 24), ecological management plans and accidental-discovery/cultural monitoring procedures. Overall, the proposal incorporates good practice measures to minimise accelerated erosion, sediment discharge and associated off-site effects and is considered consistent with Objective 5.1.2.
Policy 5.1.3.2 Managing Activities that Cause or Have the Potential to Cause Accelerated Erosion and Encouraging Appropriate Land Management Practices Through permitted activities and non-regulatory methods manage activities that cause or have the potential to cause accelerated erosion, with particular regard to:	The proposed earthworks have the potential to generate accelerated erosion and sediment runoff because of their scale and the extent of disturbed ground. These effects will be managed through the Earthworks Management Plan, Construction Management Plan and erosion and sediment controls designed in accordance with Waikato Regional Council guidance. Controls will be staged to the active earthworks footprint and adapted to site conditions, with measures for clean water diversion, sediment retention and

(a) the potential for the activity to adversely affect the purpose of the water management classes as identified in the policies in Section 3.2.2, and the coastal marine area (b) the risk of downstream sedimentation leading to accelerated infilling of lakes, estuaries, artificial watercourses, rivers, wetlands and caves (c) the erosion potential of soil when it is disturbed or vegetation is cleared (d) the potential to increase the adverse effects of flooding (e) the potential to adversely affect waahi tapu and archaeological sites or other identified sites of importance to tangata whenua as Kaitiaki (f) the potential to adversely affect natural character of the coastal environment and the margins of rivers, lakes and wetlands and areas of significant indigenous vegetation and significant habitats of indigenous fauna (g) the potential to compromise air quality objectives as identified in Module 6 Air (h) the potential to damage property and infrastructure.	treatment, stabilised access, progressive stabilisation and inspection/maintenance. The receiving environment is principally an artificial drainage network, and the EclA (refer to Industrial North – Appendix 23) concludes that construction effects on freshwater quality and habitat will be low following implementation of the proposed controls. The permanent stormwater system also maintains hydraulic connectivity and provides formalised conveyance, treatment and attenuation, reducing the potential for downstream erosion, flooding and sedimentation. Cultural and ecological values will be managed through the relevant project management plans and tangata whenua involvement. The proposal is therefore consistent with Policy 5.1.3.2.
Policy 5.1.3.3 Promote Good Practice Promote, through environmental education, good practice guides and incentives, soil and land management practices that avoid adverse effects on soil productivity, capability and versatility and the off-site effects of sediment discharge, and remedies or mitigates these effect if they do occur.	The proposal adopts good-practice soil and land management through the staged erosion and sediment control framework described for Objective 5.1.2 and Policy 5.1.3.2. Earthworks will be undertaken in accordance with Waikato Regional Council guidance and the project Earthworks and Construction Management Plans, with controls maintained, monitored and progressively adjusted as works advance. The approach prioritises prevention of erosion and sediment generation, treatment of sediment laden runoff before discharge, progressive stabilisation of completed areas and appropriate management of soil and fill. In addition, suitable materials will be reused onsite where practicable, while contaminated or unsuitable soils will be managed separately under the remediation plans. These measures are consistent with the good-practice outcome promoted by Policy 5.1.3.3.

5.2 Discharges Onto or Into Land

Barker & Associates

+64 375 0900 | admin@barker.co.nz | barker.co.nz

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Objective 5.2.2

Discharges of wastes and hazardous substances onto or into land undertaken in a manner that:

- (a) does not contaminate soil to levels that present significant risks to human health or the wider environment
- (b) does not have adverse effects on aquatic habitats, surface water quality or ground water quality that are inconsistent with the Water Management objectives in Section 3.1.2
- (c) does not have adverse effects related to particulate matter, odour or hazardous substances that are inconsistent with the Air Quality objectives in Section 6.1.2
- (d) is not inconsistent with the objectives in Section 5.1.2
- (e) avoids significant adverse effects on the relationship that tangata whenua as Kaitiaki have with their taonga such as ancestral lands, water and waahi tapu
- (f) remedies or mitigates cumulative adverse effects on the relationship that tangata whenua as Kaitiaki have with their identified taonga such as ancestral lands, water and waahi tapu.

Objective 5.2.2 is not directly engaged by an intentional discharge of wastes or hazardous substances onto or into land. The proposal does not seek to dispose of industrial waste or hazardous substances to land as part of the future industrial development.

Existing contaminated soils encountered during redevelopment will instead be managed under the Contaminated Soils Remediation Action Plans (refer to **Industrial North - 22**). Material will be assessed and either appropriately reused or contained onsite where demonstrated suitable, or removed to an authorised disposal facility. Controls include segregation, dust and runoff management, validation and an Unexpected Discovery Protocol. These measures ensure that redevelopment does not create a new discharge that would present unacceptable risks to soil, water, human health or tangata whenua values.

5.3 Contaminated Land

Objective 5.3.2

Discharges of contaminants from contaminated land shall be managed so that they:

- (a) do not present significant risk of chronic or acute toxic effects on human health, flora or fauna due to the contamination of soil and ground or surface water
- (b) do not have adverse effects on water quality or aquatic ecosystems that are inconsistent with the water management objectives in Section 3.1.2
- (c) there are no adverse effects on air quality that are inconsistent with air quality objectives in Section 6.1.2

A Preliminary Site Investigation and Detailed Site Investigation (refer to **Industrial North – Appendix 21**) have been undertaken by a Suitably Qualified and Experienced Practitioner for Industrial North. The investigations confirm a history of HAIL activities and identify localised contamination requiring management, rather than widespread contamination across the Site. Relevant findings include asbestos containing material within heterogeneous historic fill at 'Latham's Mountain', hydrocarbon contamination in shallow storage yard soils and an isolated elevated zinc concentration. Other sampled soils generally comply with the applicable commercial/industrial human-health criteria, and the Detailed Site Investigation

(d) avoid significant adverse effects on the relationship that tangata whenua as Kaitiaki have with their identified taonga such as ancestral lands, water and waahi tapu (e) remedy or mitigate cumulative adverse effects on the relationship that tangata whenua as Kaitiaki have with their identified taonga such as ancestral lands, water and waahi tapu.	concludes that the Site is unlikely to represent a significant ongoing contaminant source beyond the identified areas. The Contaminated Soils Remediation Action Plans (Industrial North – Appendix 22) establish a risk-based framework for remediation and earthworks. Measures include controlled excavation and soil handling, segregation and validation, dust suppression, management of sediment/runoff, an Unexpected Discovery Protocol, and off-site disposal to authorised facilities where material is unsuitable for reuse or containment. Asbestos affected works will be undertaken under specialist supervision with appropriate exclusion, air-monitoring and clearance procedures. Where contaminated material is retained onsite, it will be appropriately capped and subject to long-term management requirements. These measures will prevent mobilisation of contaminants to soil, groundwater and surface water and protect human health, flora and fauna during and after development. The remediation process also provides an opportunity to improve the existing environmental condition of affected parts of the Site. The proposal is therefore consistent with Objective 5.3.2.
Policy 5.3.3.1 Priorities for the Management of Contaminated Land List and prioritise land uses that present significant risk of contamination and give priority to managing those with the greatest risk.	The site investigations have identified and prioritised the areas and contaminant sources requiring active management, including the heterogeneous fill at 'Latham's Mountain', hydrocarbon affected shallow soils in the storage yard and the isolated elevated zinc location. The remediation plans apply controls proportionate to the nature and level of risk, with specialist asbestos procedures for ACM affected material and targeted remediation or management of hydrocarbon affected soils. This risk-based approach focuses management effort on the parts of the Site presenting the greatest potential risk while allowing soils demonstrated to be suitable for the proposed commercial/industrial use to be managed accordingly. The proposal is therefore consistent with Policy 5.3.3.1.

Policy 5.3.3.3 Remediation

Through rules in this Plan and resource consent processes, enable the remediation of contaminated land where the technology to be used and associated discharges are unlikely to have adverse effects that are inconsistent with the objectives or the requirements of the RMA.

The proposal will enable remediation of identified contaminated land as an integral part of redevelopment. The Contaminated Soils Remediation Action Plans (refer to **Industrial North – Appendix 22**) provide for controlled excavation and handling, validation, reuse or containment of suitable material, off-site disposal of unsuitable material, dust and runoff controls, specialist asbestos procedures and an Unexpected Discovery Protocol.

The Detailed Site Investigation (refer to **Industrial North – Appendix 21**) concludes that contamination is localised and that the wider Site is unlikely to represent a significant ongoing contaminant source. Implementing the remediation framework will reduce existing risks while ensuring that remediation activities themselves do not create unacceptable effects on human health, air, soil, groundwater or surface water. The proposal is therefore consistent with Policy 5.3.3.3.

4.0 Waipa District Plan

The relevant chapters are assessed below:

Provision	Comment
Volume 1: Part C – Strategic Policy Framework	
Section 1.3 - Strategic policy Framework	
<i>Objective - Implementation of Te Ture Whaimana</i>	
Objective 1.3.1 The health and well-being of the Waikato River is restored and protected and Te Ture Whaimana is realised.	The proposal is considered consistent with and supportive of the objectives and principles of Te Ture Whaimana o Te Awa o Waikato for the following reasons: • Early and ongoing engagement has occurred with tangata whenua through the SL1 Tangata Whenua Working Group, with cultural values and aspirations informing the planning and environmental

Barker & Associates

+64 375 0900 | admin@barker.co.nz | barker.co.nz

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management of the proposal. This is further detailed in the Engagement and Consultation Report (**Industrial North Planning Attachment 2**) and Cultural Impact Assessment (**Industrial North – Appendix 24**).

- The proposal incorporates an integrated stormwater management approach including source controls, swales, forebays, treatment wetlands, attenuation and controlled discharge to manage stormwater quality and quantity before it enters the wider receiving environment.
- The proposal includes indigenous and riparian planting associated with the existing drainage network and proposed stormwater wetlands, which will contribute to ecological enhancement and improved freshwater habitat within a highly modified environment.
- Earthworks and construction activities will be managed through erosion and sediment control measures and associated management plans to minimise sediment and contaminant discharges to downstream receiving waters. The wider SL1 stormwater strategy specifically seeks to provide water-quality treatment, manage peak flows and maintain flood-carrying capacity.
- The proposal supports integrated catchment management by coordinating industrial land use, stormwater, ecology, infrastructure and flood management, thereby reducing the potential for adverse cumulative effects on downstream freshwater environments.

Overall, the proposal supports the restoration and protection of the health and wellbeing of the Waikato River through integrated stormwater management, ecological enhancement and ongoing tangata whenua involvement. It is therefore

	considered consistent with Objective 1.3.1 and supportive of the realisation of Te Ture Whaimana o Te Awa o Waikato.
Policy Health and well-being of the Waikato and Waipā Rivers.	N/A – The application site is not within the Te Ture Whaimana catchment area.
1.3.1.1 To achieve the Objectives and Strategies of Te Ture Whaimana within the catchment area identified on the Planning Maps by District Plan provisions relating to: (a) Building setbacks and earthworks; and (b) Activities on the surface of water; and (c) Peat lake catchments; and (d) Esplanade reserves; and (e) Landscapes; and (f) Environmental Benefit Lot provisions for significant natural areas and in some circumstances riparian areas; and (g) Significant natural areas and indigenous biodiversity generally; and (h) Intensive farming activities; and (i) Public access; and (j) Customary activities; and (k) Marae and papakāinga; and (l) Cultural sites and cultural landscapes.	
Policy Maintaining and enhancing public views and public access	N/A – The site does not provide access to the Waikato and Waipā Rivers.
1.3.1.2 To maintain and, where appropriate, enhance public views and public access by development actively facing and providing access to the Waikato and Waipā Rivers.	
Objective - Settlement pattern	

Objective 1.3.2

To achieve a consolidated settlement pattern that:

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

The proposal is considered consistent with Objective 1.3.2 because it provides for a consolidated extension of Hamilton’s established urban and industrial environment in a location identified through the more recent sub-regional growth framework for industrial development. The Industrial North site directly adjoins the established Frankton industrial area, is traversed by the Hamilton Southern Links designation and forms part of the wider SL1 Growth Cell. The proposal will enable approximately 42 ha of net developable industrial land and around 168,000 m² of future industrial floorspace across 22 serviced industrial lots, materially contributing to identified industrial capacity needs within greater Hamilton.

The proposal therefore supports a consolidated settlement pattern by concentrating additional industrial development at an established urban industrial edge, rather than establishing isolated or dispersed industrial development elsewhere within the Waipā rural environment. This is consistent with the strategic direction in the Waikato Future Proof Strategy (2024–2054) and the Waikato Regional Policy Statement, which identify the wider Hamilton Airport/Southern Links area for future industrial growth and strategic infrastructure investment.

The development is also closely coordinated with existing and planned regionally and nationally significant infrastructure. The internal transport network connects to Higgins Road and Wickham Street and provides for integration with the future Hamilton Southern Links corridor, while water, wastewater, stormwater and utility infrastructure will be delivered progressively alongside each stage of development. The proposal has been designed so that industrial development does not compromise the operation, maintenance or future upgrading of the North Island Main Trunk railway, Hamilton Southern Links or surrounding urban infrastructure networks. Rather, Industrial North provides a defined development and demand base that supports the sequencing and delivery of strategic infrastructure across the wider SL1 Growth Cell.

	The Landscape and Visual Assessment (refer to Industrial North – Appendix 12) also supports the appropriateness of the location, identifying the Site as a highly modified rural industrial edge and assessing the proposal as a logical extension of Hamilton’s industrial area. With the embedded landscape response, including planted stormwater reserves, wetland margins, swales, street and frontage planting, landscape and visual effects are assessed as low adverse (less than minor). Overall, it is considered that the Industrial North represents a well-planned and consolidated urban growth at an established industrial edge, in a location strategically identified for future industrial development and coordinated with existing and planned significant infrastructure. The proposal therefore supports the anticipated settlement pattern and is considered consistent with Objective 1.3.2.
Policy Settlement pattern	Industrial North is located immediately adjoining Hamilton's established Frankton industrial area and within the wider Southern Links Growth Cell identified through the Waikato Future Proof Strategy 2024-2054 for future urban growth. The proposal therefore implements the anticipated sub-regional settlement pattern by concentrating new industrial capacity at an existing urban industrial edge rather than establishing dispersed industrial development elsewhere in the rural environment. The proposal will enable approximately 42 ha of net developable industrial land and around 168,000 m² of future industrial floorspace across 22 serviced lots. The Economic Assessment (refer to Industrial North – Appendix 29) identifies a tight industrial market and a long-term shortfall in industrial capacity, so bringing a substantial, comprehensively planned and serviced precinct forward will materially contribute to meeting identified business land demand. The masterplan is also coordinated with strategic infrastructure. It integrates with Higgins Road, Wickham Street and the future Hamilton Southern Links corridor, while the staged servicing strategy provides for transport, stormwater, wastewater, water supply and utilities to be delivered alongside development. The Urban Design
1.3.2.1 To ensure that all future development and subdivision in the District contributes towards achieving the anticipated settlement pattern in the Future Proof Growth Strategy and Implementation Plan 2022 and the District Growth Strategy (or any subsequent replacement).	

	Assessment (refer to Industrial North – Appendix 10) and Landscape and Visual Assessment (refer to Industrial North – Appendix 12) both support the Site's role as a logical and coherent extension of Hamilton's existing industrial structure. The proposal is therefore consistent with Policy 1.3.2.1.
Policy Towns	Although the Site is presently within the Waipā Rural Zone and outside the urban limits identified in the operative District Plan, it lies directly on the Hamilton City boundary and adjoins the established Frankton industrial area. In that context, the Site is more appropriately understood as part of the planned expansion of the greater Hamilton urban environment rather than as an isolated industrial activity within rural Waipā.
1.3.2.2 To provide for a consolidated settlement pattern by ensuring that new urban activities are focused within the urban limits of the towns of the District and in particular: (a) Residential developments and subdivision being located within the residential zones of Cambridge, Te Awamutu and Kihikihi, and also above ground floor level within the Commercial Zone; provided that this policy does not limit further development within the Residential Zone at Karāpiro identified on Planning Map 31. (b) To provide for medium density residential development in relevant residential zones located within the urban environs of Cambridge, Kihikihi and Te Awamutu, except where qualifying matters require modification of the medium density residential standards. (c) A range of accommodation facilities and services to support the long term accommodation and care requirements for the existing and future elderly population, some of which may need to occur on the periphery of towns outside of the current urban limits as well as within the Residential Zone and Medium Density Residential Zone. (d) Retail activities, offices and commercial services being located within the Commercial Zones of the District, in a manner that ensures the vitality of the identified pedestrian frontage areas, and maintains Cambridge and Te Awamutu as the primary commercial centres of the District. (e) To recognise the potential for the following new areas of commercial zoning:	The more recent strategic planning framework supports that interpretation. The wider Southern Links Growth Cell has been identified for future urban development, and the Hamilton Airport/Southern Links area is recognised as a strategic industrial location through the Waikato Regional Policy Statement and the <i>Waikato Future Proof Strategy (2024–2054)</i>. The proposal will provide approximately 42 ha of net developable industrial land and around 168,000 m² of industrial floorspace, directly responding to identified short-, medium- and long-term industrial land demand within greater Hamilton. The proposal is also supported by a comprehensive suite of technical assessments that consider long-term and cumulative effects and demonstrate that the development can be efficiently serviced without creating unacceptable conflicts with existing or planned infrastructure. The Industrial North proposal will integrate with the Hamilton Southern Links corridor and with existing and planned transport, water, wastewater, stormwater and utility networks. The development will also support infrastructure upgrades and contribute to the coordinated servicing of the wider SL1 Growth Cell.

i. The deferred Commercial Zone in Carter’s Flat, Cambridge will be considered for rezoning to once a new Industrial Zone at Hautapu is in place, and the Cambridge bypass is complete; and ii. A possible motorway service centre at Hautapu; and iii. Local and neighbourhood centres within Deferred Zones and future growth areas. (f) Industrial Zoned land being maintained for industrial activities and new Industrial Zoned land being provided for within the urban limits at Hautapu (96ha gross), Bond Road (21ha gross) and Paterangi Road (8.5ha). (g) Developments within the Commercial Zone and Industrial Zone that increase the type and range of employment opportunities within the District and reduce the level of commuting traffic into Hamilton will be supported.	There is an acknowledged tension with the operative policy framework insofar as it focuses urban development within the District Plan’s existing town urban limits. However, the proposal is consistent with the underlying objective of achieving a consolidated settlement pattern. It locates new industrial development immediately contiguous with an existing urban area and established industrial node, rather than dispersing industrial activities into unrelated rural locations, and provides a clear transition between Hamilton’s existing and planned urban environment and the remaining rural land within Waipā District. Overall, while the Site sits outside the operative District Plan urban limits, its development is consistent with the more recent strategic direction for future urban growth, represents a logical and efficiently serviced extension of the established Frankton industrial area, and supports a consolidated urban form.
Policy Large Lot Residential 1.3.2.3 To maintain the natural and physical resources of the rural area and rural character by focusing: (a) Large lot residential developments into Large Lot Residential Zones; and (b) New retail activities and commercial services being located within the village commercial centres in Pirongia and Ōhaupo as a means for providing for the needs of those communities.	N/A – The site is in the rural zone.
Policy Hamilton Airport Strategic Node 1.3.2.4 To enable a defined mixed use, industrial and business area that: (a) Supports the Hamilton International Airport’s role as a transport hub; and	N/A – The site is not within the Hamilton Airport Strategic Node.

(b) Is consistent with the Hamilton Airport Industrial Node in the Waikato Regional Policy Statement, and is not of a large enough size or diverse enough function to compromise the primary commercial centres of Cambridge and Te Awamutu and the Hamilton central business district in the context of the sub-region; and (c) Fulfils its role as an industrial node and employment area for the sub-region.	
Policy Subdivision and development within the Rural Zone 1.3.2.5 To ensure that the natural resources of the Rural Zone, including high class soils, continue to be used for rural activities by: (a) Avoiding residential developments and dwellings that are at a density greater than that anticipated by the Rural Zone; and (b) Avoiding commercial activities and industrial activities, except for rural based industries and nature tourism; and (c) Ensuring that development and subdivision activities within the Rural Zone do not reduce the area of land available for farming activities in the District; and (d) Rural based industries not being of a size or location where they undermine the role of a strategic industrial node identified in the Proposed Waikato Regional Policy Statement, or have an adverse effect on the strategic road network or other infrastructure. Rural based industries shall have a functional and compelling needs to locate in the Rural Zone; and (e) Managing actual or potential adverse effects on the health and well-being of water bodies; and (f) Avoiding sensitive subdivision, use and development that could result in reverse sensitivity effects on rural activities or existing lawfully established rural based industries.	The proposal is not directly consistent with the operative Rural Zone direction in Policy 1.3.2.5, as it will establish urban industrial activities that exceed the anticipated activities and performance standards of the Rural Zone and will permanently remove part of the Site from rural production. In particular, this is contrary to the specific direction in clause (b) to avoid industrial activities within the Rural Zone other than rural based industries and nature tourism, and does not maintain the affected land for farming activities as anticipated by clause (c). This tension with the operative policy is acknowledged. However, the particular location, characteristics and more recent strategic planning context of Industrial North materially distinguish the proposal from the ad hoc or dispersed industrial development within the wider Rural Zone that the policy seeks to avoid. The Site directly adjoins the established Frankton industrial area, is traversed by the Hamilton Southern Links designation and forms part of the wider SL1 Growth Cell. The Hamilton Airport/Southern Links area has subsequently been identified through the Waikato Regional Policy Statement and <i>Waikato Future Proof Strategy (2024–2054)</i> as a strategic industrial location for accommodating future industrial growth. The Site is also subject to the strategic agreement between Hamilton City Council and Waipā District Council for its future transfer to Hamilton City. It is therefore more appropriately understood as part of the planned expansion and consolidation of Hamilton's urban and industrial environment than as an isolated industrial incursion into the wider Waipā rural environment.

(g) Managing the effects of development on on-going access to mineral resources.	The existing and productive characteristics of the Site also provide important context. Industrial and waste-management activities already occupy substantial parts of the northern Site, while the detailed Soil and Land Use Capability Assessment (refer to Industrial North – Appendix 28) identifies the remaining productive land as a constrained, fragmented and significantly modified resource, affected by peat soils, poor drainage and wetness limitations, existing modification and future severance by Southern Links. While the loss of land from rural production remains an adverse outcome in terms of the operative Rural Zone policy, the proposal concentrates industrial development in this strategically identified location and thereby reduces pressure for dispersed industrial development elsewhere in the Rural Zone, where land may have stronger rural productive values and fewer urban influences. Importantly, the proposal is for a comprehensive and masterplanned industrial precinct rather than incremental industrial development. The industrial lots, internal road network, three waters infrastructure, stormwater wetlands, landscape framework and connections to existing and future strategic infrastructure have been planned as an integrated whole. Potential interface and reverse sensitivity effects will be managed through operational noise controls, the exclusion of noise-sensitive activities from the industrial lots, building setbacks, landscape buffers and screening. Stormwater treatment, ecological management and construction controls will similarly manage effects on freshwater, biodiversity and the wider receiving environment. Accordingly, while the proposal departs from and cannot be described as directly consistent with Policy 1.3.2.5 in terms of its Rural Zone land use and productive land outcomes, that conflict needs to be considered in the particular context of the Site. Industrial North consolidates development immediately adjoining an established industrial area and within a subsequently identified strategic growth location, rather than establishing a dispersed pattern of rural-industrial development. The significance of the policy tension is therefore materially reduced by the Site's existing
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	characteristics, subsequent strategic planning direction and the comprehensive effects-management framework proposed.
Policy Agritourism	N/A – The proposed development does not involve agrotourism.
1.3.2.6 To enable agritourism where the activity supports a hub of activities within the immediate environs of the Mystery Creek Events Zone and Lake Karāpiro Events Zone, and where the: (a) Scale and nature of the adverse effects from the activity, including servicing and connections with the transport network can be appropriately mitigated; and (b) Activity will not adversely affect the health and well-being of the Waikato River.	
Policy Protection of regionally important sites	N/A – The proposed development will not impact the operation of these land uses.
1.3.2.7 To protect the ability of Hamilton International Airport, the Mystery Creek Events Centre, the Tokanui Dairy Research Centre and the existing dairy manufacturing sites located at Hautapu and Te Awamutu to continue to operate, grow and develop by limiting noise sensitive activities on surrounding sites.	
Policy Regionally significant and nationally significant infrastructure	The Industrial North proposal has been designed to protect and integrate with existing and planned regionally and nationally significant infrastructure. The Hamilton Southern Links designation traverses the Site and the North Island Main Trunk railway forms the eastern edge. The masterplan, road hierarchy and lot layout have been developed around these corridors rather than constraining their operation or future development.
1.3.2.8 To ensure that new development does not adversely affect the ongoing operation maintenance, upgrading and development of existing and planned regionally significant infrastructure and nationally significant infrastructure.	

	The transport strategy provides for early access through the Kahikatea Drive/Higgins Road network and future integration with Southern Links, with detailed interfaces to be coordinated with NZTA and Hamilton City Council. Industrial activities are inherently compatible with the freight and transport function of these corridors, and proposed conditions preclude noise sensitive activities within the industrial precinct, avoiding reverse-sensitivity constraints on transport and adjoining industrial infrastructure. The proposal will also contribute to the delivery of wider strategic infrastructure by establishing a substantial development and demand base for Southern Links and future strategic water and wastewater investment. The staged servicing strategy preserves compatibility with longer-term network upgrades while allowing each stage to be appropriately serviced. The proposal is therefore consistent with Policy 1.3.2.8.
Objective - Planned and integrated development	
Objective 1.3.3 To ensure that development and subdivision happens in a way and at a rate that is consistent with the anticipated settlement pattern, maximises the efficient use of zoned and serviced land, and is co-ordinated with cost-effective infrastructure provision.	The proposal is considered consistent with Objective 1.3.3. The Industrial North forms part of the wider SL1 Growth Cell and is a comprehensively masterplanned and staged industrial precinct immediately adjoining the established Frankton industrial area. The wider Southern Links area is identified through the <i>Waikato Future Proof Strategy (2024–2054)</i> as a strategic location for future industrial growth, and the proposal will enable approximately 42 ha of net developable industrial land and around 168,000 m² of anticipated industrial floorspace across 22 serviced industrial lots. It therefore represents a logical extension of Hamilton's existing industrial environment and responds directly to identified demand for additional industrial capacity within greater Hamilton. This demand is supported by the <i>Future Proof Partners Business Development Capacity Assessment 2023</i>, which identifies a shortfall in industrial land and available industrial space in Hamilton over the medium to long term. Locating additional

industrial capacity within an identified strategic growth area adjoining an established industrial node will make efficient use of the locational advantages of the Site, including its proximity to existing employment areas and the future Hamilton Southern Links strategic transport corridor, while avoiding a dispersed or piecemeal pattern of industrial development.

Development is coordinated with a staged infrastructure strategy covering transport, stormwater, wastewater, potable water and utilities, as detailed in the Infrastructure Report (refer to **Industrial North – Appendix 13**). The staging approach enables existing network capacity and connections to be utilised where appropriate in the earlier stages, with later stages coordinated with planned strategic upgrades so that each stage is appropriately serviced without compromising the ultimate network solution. The transport network provides connections to Higgins Road and Wickham Street, incorporates improvements to the surrounding network and integrates with existing and planned walking and cycling connections and the future Southern Links corridor.

Stormwater will similarly be managed through an integrated treatment and attenuation system incorporating on-lot retention or soakage, swales, forebays and three constructed wetlands, while wastewater and potable water infrastructure will be progressively delivered alongside development. This coordinated approach provides for the efficient sequencing of development and infrastructure investment across Industrial North and supports the longer-term servicing of the wider SL1 Growth Cell.

Overall, the proposal converts strategically identified industrial growth capacity into feasible and appropriately serviced industrial land, while coordinating development with existing and planned strategic infrastructure. It therefore supports the anticipated settlement pattern, responds to identified industrial land demand and promotes the efficient and cost-effective provision of infrastructure sought by Objective 1.3.3.

Policy Implement Waikato Regional Policy Statement: Te Tauākī Kaupapahere Te-Rohe O Waikato, Future Proof and Waipā District Growth Strategy	The Industrial North gives practical effect to the more recent strategic direction in the Waikato Regional Policy Statement and Waikato Future Proof Strategy 2024-2054 by enabling planned industrial growth at Hamilton's south-western urban edge. The Site directly adjoins the established Frankton industrial area and forms part of the wider Southern Links Growth Cell associated with the future Hamilton Southern Links corridor. The proposal will enable approximately 42 ha of net developable industrial land and around 168,000 m² of future industrial floorspace, providing a substantial contribution to identified industrial capacity needs. It is comprehensively masterplanned and coordinated with transport, stormwater, wastewater, water and utility infrastructure, including future integration with Southern Links and strategic three-waters upgrades. The staged approach allows development to proceed in a manner that is compatible with existing network capacity while preserving the ultimate strategic infrastructure solution. Accordingly, the proposal represents planned growth that is aligned with the contemporary regional and sub-regional settlement strategy rather than an unplanned expansion into the wider rural environment and is considered consistent with Policy 1.3.3.1.
Policy Out of sequence and out of zone plan changes 1.3.3.2 To have regard to potential plan changes that are otherwise not enabled or not in sequence with the planned release of land where that plan change would: (a) Contribute to a well-functioning urban environment; and (b) Provide the necessary infrastructure required for the proposed development; and (c) Be well connected to public transport and transport corridors; and	No plan change is sought, so Policy 1.3.3.2 is not directly engaged as a plan-change test. However, its underlying considerations are relevant because the proposal enables urban industrial development on Rural zoned land through the Fast-track process. The Industrial North contributes to a well-functioning urban environment by: • Providing substantial new business land and employment capacity adjoining the established Frankton industrial area;

(d) Provide significant development capacity.	• Comprehensively servicing the site through staged transport and three waters infrastructure; • Directly associated with existing and future strategic transport corridors, including Southern Links; and • Providing significant additional development capacity in response to an identified industrial shortfall. Based on the above, it is considered that the proposal therefore broadly aligns with the considerations that the policy applies to out-of-sequence or out-of-zone growth, notwithstanding that no rezoning is proposed.
Policy Co-ordination of Subdivision and Development in Deferred Zones 1.3.3.3 To avoid subdivision and development in Deferred Zones that is not generally in accordance with Appendix S1 unless: (a) The development can be adequately serviced at the cost of those parties undertaking the development and does not undermine committed infrastructure investments made by Council to support other growth areas; and (b) The development meets the relevant criteria for alternative land release in the Regional Policy statement. Advice Note: This Policy does not apply to developments under {Link,16813, Policy 1.3.3.4} below.	N/A – The site is not within a deferred zone.
Policy Sequencing and Staging: accommodation for the aging population 1.3.3.4 A range of accommodation facilities and services for the long-term accommodation and care requirements of the existing and future elderly	N/A – The proposal is not for aged care.

population may be considered in future growth areas where it can be shown that: (a) Sufficient zoned and serviced land is not available for the specific nature of the development; and (b) The development can be adequately serviced at the cost of those parties undertaking the development and does not undermine committed infrastructure investments made by Council to support other growth areas; and (c) The development provides heritage, archaeological, recreational or ecological features (preferably within the site) which benefit the wider community and are protected in perpetuity for public use and/or access.	
Policy Efficient use of zoned and serviced land	N/A – No residential development is proposed.
1.3.3.5 Maximise the efficient use of existing physical resources by requiring all new serviced residential greenfield development and subdivisions to have a range of lot sizes that achieve an overall target density of 12 to 15 dwellings per ha of gross developable area.	
Policy Avoid development and subdivision that compromises the development of Deferred Zones and future growth areas	N/A - The site is not within a deferred zone.
1.3.3.6 To ensure that development and subdivision within Deferred Zones and future growth areas does not compromise anticipated future uses.	
Policy Co-ordination between subdivision and development and infrastructure	The proposal is strongly aligned with Policy 1.3.3.7 because subdivision and development are expressly coordinated with the infrastructure required to service each stage. The Infrastructure Report (refer to Industrial North – Appendix 13) provides an integrated strategy for transport, stormwater, wastewater, potable water, power and telecommunications, with staging structured so that each
1.3.3.7 To manage the increased demand on infrastructure from development and subdivision by requiring all subdivision and development to be co-ordinated with the provision of infrastructure including utility services, and integrated	

with the transport network and the District’s road hierarchy. If subdivision and development is likely to occur in areas currently supplied, or intended to be supplied by municipal services, but in advance of the provision of municipal services, then the provision of infrastructure by developers shall be to a design and standard that will enable integration with public service provision. The provision of infrastructure by developers must take into account the available or planned network capacity.	development stage can operate with the necessary infrastructure while remaining compatible with the ultimate network solution. Early water stages utilise existing Higgins Road and Wickham Street networks before transitioning to future bulk supply infrastructure. Wastewater servicing incorporates pump stations, storage and off-peak pumping to manage existing downstream constraints pending wider strategic upgrades. Stormwater is managed through a gravity based treatment train comprising on-lot retention or soakage, swales, forebays and constructed wetlands. The transport network provides connections to Higgins Road and Wickham Street and is designed to integrate with future Southern Links, while walking and cycling facilities are incorporated within the street network. This staged and adaptable servicing approach makes efficient use of existing capacity, provides for planned network upgrades and avoids infrastructure being delivered in an isolated or uneconomic manner. The proposal is therefore consistent with Policy 1.3.3.7.
Policy Co-ordinated infrastructure at the Hautapu and Te Awamutu Dairy Manufacturing Sites 1.3.3.8 To ensure the increased demand on infrastructure near the Hautapu and Te Awamutu Dairy Manufacturing Sites is managed in an integrated manner by allowing the provision of private on-site infrastructure where it cannot practicably be provided through municipal supply because of timing, design, operational constraints or because other more sustainable methods are available (i.e. land disposal).	N/A – The site is not located within the Hautapu and Te Awamutu Dairy Manufacturing Sites.
Policy Uneconomic expansion of existing infrastructure 1.3.3.9	The proposal will not result in uneconomic expansion of existing infrastructure. Industrial North is supported by a coordinated and staged servicing strategy that makes use of existing capacity where practicable while preserving clear pathways to future strategic upgrades. Water, wastewater, stormwater, transport and utility

Subdivision and development which results in the uneconomic expansion of existing infrastructure shall be avoided.	infrastructure will be delivered progressively with development rather than through ad hoc extensions solely serving isolated activities. • Wastewater storage and off-peak pumping manage current downstream capacity constraints; • Early water connections utilise existing networks before transition to future bulk infrastructure; • The stormwater system operates primarily by gravity through source controls, swales, forebays and constructed wetlands; • Transport upgrades are coordinated with the wider network and future Southern Links; • The infrastructure will also support the wider SL1 Growth Cell and contribute to the demand base for strategic infrastructure investment. On that basis, the proposal is considered consistent with Policy 1.3.3.9.
Objective - Tāngata whenua	
Objective 1.3.4 To uphold, and assist tāngata whenua to uphold, the partnership principles inherent within Te Tiriti o Waitangi, by assisting tāngata whenua to maintain and enhance their culture, traditions, economy and society, in order that their well-being (mauri) and health (hauora) is maintained.	The proposal recognises and promotes the cultural and historic relationships of tangata whenua with the District through the SL1 Tangata Whenua Working Group and the Cultural Impact Assessment (refer to Industrial North – Appendix 24). The assessment treats the Site as part of a wider cultural landscape and recognises relationships with whenua, wai, ecological systems and taonga species, rather than limiting cultural values to recorded archaeological sites. Tangata whenua input has informed stormwater, ecological restoration, landscape and environmental management responses. The Cultural Impact Assessment also recommends continued involvement in ecological restoration, fish and bat management, monitoring and adaptive management, providing a practical
Policy Cultural and historic relationship	
1.3.4.1 To recognise and promote the cultural and historic relationships tāngata whenua have with the District.	

	mechanism for kaitiakitanga to continue through implementation. This ongoing partnership approach is considered consistent with Policy 1.3.4.1.
Policy Role of marae and papakāinga	N/A – The proposal does not include papakāinga or marae.
1.3.4.2 To recognise that marae and papakāinga are the focus of, and an essential part of the development of Māori culture, traditions, society and economy.	
Policy Functions of papakāinga	
1.3.4.3 To enable a diverse range of social and educational activities that meet the needs of people living within the papakāinga development, and to recognise the wider community function that marae and papakāinga serve.	
Policy Planning for marae and sustainable papakāinga	
1.3.4.4 To encourage and assist in the integrated and holistic planning for marae and papakāinga developments and to ensure that marae and papakāinga developments are sustainable, and that any development is co-ordinated with infrastructure provision.	
Objective - Environmental and heritage protection and recreation values	
Objective 1.3.5 To ensure that development and subdivision activities maintain and where possible enhance the environmental, heritage and recreational values of the District.	The proposal has been designed to maintain and, where practicable, enhance environmental, heritage and recreational values within what is presently a highly modified rural-industrial edge environment. The EclA (refer to Industrial North - Appendix 23) identifies limited indigenous terrestrial vegetation, artificial watercourses of negligible to low ecological value and no natural inland wetlands within Industrial North. Notwithstanding this modified

baseline, ecological values associated with indigenous fauna are present, including long-tailed bats, indigenous birds, potential lizard habitat and indigenous freshwater fish, and these values have informed the design and effects management response. Potential effects will be managed through the avoidance, minimisation, remediation and mitigation measures identified in the EclA and Ecological Management Plans (refer to **Industrial North - Appendix 23**). Species specific Bat, Bird, Lizard and Fish Management Plans provide for measures including pre-clearance surveys and checks, seasonal controls, salvage and relocation where required, DOC compliant bat roost protocols and bat sensitive lighting.

The proposal will also deliver positive ecological outcomes through the establishment of indigenous and riparian planting and three vegetated stormwater wetlands. Together with the wider blue-green network, these measures will increase indigenous vegetation and habitat diversity, improve ecological connectivity and provide additional freshwater and terrestrial habitat within the future industrial environment. The EclA concludes that, following implementation of the proposed management measures, ecological effects will be very low to low with no significant residual effects.

Heritage and cultural values have also been specifically considered. The Archaeological Assessment (refer to **Industrial North – Appendix 25**) identifies no recorded archaeological sites within the application area, with accidental discovery procedures proposed to appropriately manage any previously unidentified archaeological material encountered during construction. Cultural values and tangata whenua relationships with the whenua, wai and wider environment have been addressed through ongoing engagement with the SL1 Tangata Whenua Working Group, as documented in the Engagement and Consultation Report (**Industrial North Planning Attachment 2**) and Cultural Impact Assessment (**Industrial North – Appendix 24**), and have informed the environmental and ecological response to the development.

	The proposal will also provide an integrated walking and cycling network associated with the internal road and blue-green networks, connecting with existing and planned routes in the surrounding area. This will improve opportunities for active movement and connectivity through Industrial North and the wider SL1 Growth Cell. Overall, the proposal appropriately recognises and manages the environmental and heritage values present within the Site while providing opportunities for ecological enhancement and improved active-mode connectivity. It is therefore considered consistent with Objective 1.3.5.
Policy Management of adverse effects	
1.3.5.1 To ensure that development and subdivision is undertaken in a manner that: (a) Does not result in a net loss of indigenous biodiversity; and (b) Protects areas of outstanding landscape; and (c) Maintains cultural landscapes and other identified landscape areas and features of high amenity; and (d) Protects listed heritage items; and (e) Retains and where possible enhances recreation values.	The proposal appropriately manages the environmental, landscape, cultural and heritage matters addressed by Policy 1.3.5.1. The Site is not located within an identified Outstanding Natural Landscape or viewshaft, and the Landscape and Visual Assessment characterises the receiving environment as a highly modified rural-industrial edge of low landscape value. While the proposal will increase the extent and intensity of industrial development, its landscape and visual effects are assessed as low adverse (less than minor). The proposed site layout, building setbacks and landscape response will assist in integrating industrial built form, with planted stormwater reserves, wetland margins, swales, frontage planting and street trees establishing a coherent blue-green framework and progressively softening the development within its receiving environment. The EclA (refer to Industrial North – Appendix 23) similarly identifies Industrial North as a highly modified environment with limited existing indigenous vegetation, artificial watercourses of negligible to low ecological value and no natural inland wetlands. Notwithstanding this modified baseline, ecological values associated with indigenous fauna and freshwater habitats have been identified and appropriately considered. Potential effects on long-tailed bats, indigenous birds, lizards and indigenous freshwater fish will be managed through the avoidance, minimisation, remediation and mitigation measures identified in the EclA and the species-specific

	Ecological Management Plans (refer to Industrial North – Appendix 23). Following implementation of these measures, residual ecological effects are assessed as very low to low, with no significant residual effects. The proposal will also provide opportunities for ecological enhancement through indigenous restoration and riparian planting and the establishment of three vegetated stormwater wetlands. Together with the wider blue-green network, these measures will increase indigenous vegetation and habitat diversity and improve ecological connectivity relative to the existing modified environment. This provides an integrated response to managing biodiversity effects while enhancing ecological values within the future industrial environment. Heritage and archaeological values have also been assessed. The Archaeological Assessment (refer to Industrial North – Appendix 25) identifies no recorded archaeological sites within the application area, with accidental discovery procedures proposed to appropriately manage any previously unidentified archaeological material encountered during construction. Cultural landscape values and tangata whenua relationships with the whenua and wai have separately been considered through ongoing engagement as part of the wider SL1 project and preparation of the Cultural Impact Assessment (refer to Industrial North – Appendix 24), with these values informing the development and environmental management response. Overall, the proposal appropriately manages identified effects on indigenous biodiversity, landscape, cultural and heritage values while also providing for ecological and landscape enhancement within the future industrial environment. The proposal is therefore considered consistent with Policy 1.3.5.1.
Policy Environmental, recreational and heritage protection	N/A – The site is not identified as an SNA and there are no heritage sites or places on the site in the Waipa District Plan. The site is not within the Te Awa cycleway or an Incentivised Cycleway.
1.3.5.2	

To consider additional development and subdivision opportunities in circumstances where: (a) Significant natural areas, located within the indigenous forest corridors, are permanently protected; or (b) Significant heritage sites and places are permanently protected; or (c) Land provided for the Te Awa cycleway or an Incentivised Cycleway is permanently protected. Provided that the anticipated settlement pattern is not compromised, reverse sensitivity effects are avoided and that any other adverse effects on the environment are appropriately mitigated.	
Policy Nature tourism	N/A – The proposal does not include nature tourism activities.
1.3.5.3 Nature tourism activities that are directly reliant on and either within, or immediately adjoining outstanding natural features and landscapes, high amenity landscapes, significant landscape features at a District level, and significant natural areas that are nationally significant will be encouraged where the scale and nature of the adverse effects from the activity, including on the landscape or feature itself and connections with the transport network can be appropriately mitigated.	
Policy Promoting new recreation experiences	The proposed development provides walking and cycling connections through the site into the surrounding roading network along Higgins Road.
1.3.5.4 To promote new recreation experiences in the District, in particular the Te Awa Cycleway and Incentivised Cycleways, and activities located on existing reserves, where adverse effects are appropriately managed.	The sites are not located in the Te Awa Cycleway and Incentivised Cycleways. The development supports the reduction of greenhouse gas emissions by supporting industrial land use in an already established industrial node near Hamilton city and key transport routes including the future planned Hamilton Southern Links roading corridor. The proposed site location mitigates against the need to locate industrial activities on greenfield sites without a high level of servicing.

Policy Enhancing existing recreation and conservation values	No reserves are present on the site, and the proposed development will create net environmental gains by enhancing and restoring the ecological values of the site.
1.3.5.5 To enhance the recreation and ecological values of the District, by improving the function and access to existing reserves whilst ensuring areas of historic and ecological importance are protected and the development or subdivision results in net environmental gains. Advice Note: Refer also to the environmental benefit lot provisions in Section 15 - Infrastructure, Hazards, Development and Subdivision.	The proposed new wetlands will support the management and treatment of stormwater and enable ecological enhancement and restoration. The development prioritises the health and well-being of the existing significant terrestrial and freshwater ecological values within the proposed development area and the wider catchment.
Policy Implement Environment Strategy	The proposal incorporates environmental protection and enhancement as an integral part of the industrial masterplan. The EclA (refer to Industrial North - Appendix 23) identifies the Site as a highly modified environment with limited indigenous terrestrial vegetation and artificial drainage features of negligible to low freshwater value. No natural inland wetlands have been identified within Industrial North.
1.3.5.6 To enable activities that are consistent with the outcomes and probable actions in the Environment Strategy subject to the appropriate management of site-specific adverse effects.	Potential effects on long-tailed bats, birds, lizards and freshwater fish will be managed through the Ecological Management Plans, including pre-clearance protocols, seasonal controls, salvage and relocation where required, bat-sensitive lighting and habitat enhancement. Indigenous and riparian planting and three constructed stormwater wetlands will increase indigenous vegetation, habitat diversity and ecological connectivity across the Site. The permanent stormwater system will also provide improved treatment and attenuation of runoff before discharge to the Waitawhiriwhiri catchment. The EclA concludes that, following the proposed effects-management measures, ecological effects will be very low to low with no significant residual effects. The proposal therefore appropriately manages site-specific effects while delivering environmental enhancement consistent with Policy 1.3.5.6.
<i>Objective - Energy and resource efficiency, design, character and amenity</i>	

Objective 1.3.6 To ensure that developments and subdivisions maintain and where possible enhance key elements of character and incorporate design and sustainability principles.	
Policy Urban design, character and amenity	The proposal is considered consistent with the urban design, character and amenity direction of Policy 1.3.6.1. Industrial North has been comprehensively masterplanned to create a functional, coherent and high-quality industrial environment that responds to its location adjoining the established Frankton industrial area while appropriately managing its interfaces with the surrounding rural environment, strategic infrastructure corridors and public streets.
1.3.6.1 Urban developments and subdivisions shall: (a) Maintain and where possible enhance key elements of character through building and infrastructure design, and the layout of sites; and (b) Actively incorporate sustainability principles within the design and layout of the development and subdivision as well as the infrastructure servicing the development.	The Urban Design Assessment (refer to Industrial North – Appendix 10) identifies a connected and legible road hierarchy, 22 serviced industrial lots of varying sizes and attributes, and an integrated blue-green stormwater and landscape network. The movement network connects with Higgins Road and Wickham Street, provides for integration with the future Hamilton Southern Links corridor, and incorporates walking and cycling facilities through the development. This provides a clear structure for the precinct and supports connectivity with the surrounding transport and active-mode networks. Future development will be managed through Core Controls based on relevant industrial zone standards and adapted to the particular characteristics of the Site. These address matters including building scale and placement, setbacks, frontage landscaping, permeable surfaces, screening, outdoor storage, loading and servicing areas, pedestrian access and ancillary office and retail activities. More sensitive rural and public street interfaces receive additional setback and landscape treatment, while appropriate separation is provided from the railway and Southern Links corridors. This framework provides sufficient flexibility for the functional and operational requirements of industrial activities while ensuring that larger buildings, yards, storage and servicing areas are appropriately integrated into the streetscape and surrounding environment. Landscape treatment is an important component of this response. As detailed in the Landscape Drawings and Design Statement (refer to Industrial North – Appendix 11 and 12), planting is proposed along road corridors, Site boundaries, drainage

	corridors and around the proposed stormwater wetlands. Together with street and frontage planting, this will establish a coherent landscape framework, soften and integrate industrial built form and provide an appropriate level of amenity within the future industrial environment. The proposal recognises that the character of the Site will change through the consolidation and intensification of industrial development; however, that change is appropriate given the existing industrial activities on the Site, its direct relationship with the established Frankton industrial area and its location within an area strategically identified for future industrial growth. The proposal also incorporates sustainability and resilience principles into the infrastructure and landscape design. As detailed in the Infrastructure Report (Industrial North – Appendix 13) and Stormwater Management Plan (Industrial North – Appendix 14), stormwater will be managed through an integrated system incorporating source controls, retention or soakage, swales, forebays, treatment and attenuation through three constructed wetlands, with allowance made for the future effects of climate change. Indigenous and riparian planting associated with the wetlands and wider blue-green network will provide additional ecological, landscape and amenity benefits. Overall, the masterplan and associated Core Controls provide an integrated framework for achieving a functional, connected and attractive industrial environment while appropriately managing built form, streetscape, landscape, servicing, amenity and environmental effects. The proposal is therefore considered consistent with Policy 1.3.6.1.
Policy Rural character and amenity	The proposal will result in a permanent change in character from the existing mixed rural industrial edge to a comprehensively planned industrial environment, and therefore will not maintain the rural character of the Site itself as anticipated by the Rural Zone. This change is acknowledged. However, the Site is not located within a Significant Natural Area or an identified outstanding or high amenity landscape, and
1.3.6.2 To maintain key elements of rural character and amenity by restricting the number and location of buildings, and to maintain the values associated with identified landscapes and significant natural areas.	

its existing character is already substantially influenced by industrial, waste-management and transport related activities across the northern parts of the Site, the adjoining Frankton industrial area, the NIMT railway and the Hamilton Southern Links designation.

The Landscape and Visual Assessment (**Industrial North – Appendix 12**) characterises the receiving environment as a highly modified rural industrial edge of low landscape value and assesses the resulting landscape and visual effects of the proposal as low adverse (less than minor). The proposed change in character also needs to be considered in the Site's wider strategic context. Industrial North forms part of the SL1 Growth Cell and is located within the Hamilton Airport/Southern Links strategic industrial node, where future industrial development is anticipated through the more recent regional and sub-regional strategic planning framework. The proposal therefore represents the consolidation and planned extension of an established industrial environment rather than an isolated industrial incursion into the wider Waipā rural environment.

The comprehensive masterplan will assist in establishing a clearly defined and appropriately managed urban-rural edge. Setbacks and planting along Site boundaries and road corridors, together with landscaped stormwater reserves, wetland and drainage corridor planting and screening of outdoor storage and servicing areas, will soften and integrate industrial built form and manage views from surrounding rural areas. These measures, detailed through the Landscape Drawings and Design Statement (**Industrial North – Appendix 11**), will be particularly important at those interfaces where the development adjoins land that will retain a rural character and function.

Concentrating industrial development within the comprehensively planned SL1 Growth Cell also avoids an ad hoc, ribbon or dispersed pattern of industrial development that would result in greater fragmentation of the wider rural environment. In this respect, the proposal establishes a more coherent boundary

	between Hamilton's existing and planned urban industrial environment and the rural land that remains to the south and west, while supporting the retention of rural land beyond the identified growth area for primary production and other rural purposes. Overall, while the proposal will not retain the existing rural character within the Site, that change occurs within an already modified rural-industrial edge and in a location strategically identified for future industrial growth. Through comprehensive masterplanning, setbacks, landscaping and screening, effects on the character and amenity of the remaining rural environment will be appropriately contained and managed.
Policy Energy and resource efficiency	The proposal incorporates resource and energy efficient design principles at the subdivision and infrastructure scale. Industrial growth is consolidated adjacent to an existing industrial node and strategic transport infrastructure, reducing the need for a separate, dispersed employment location. The street network includes footpaths and shared walking and cycling facilities and will integrate with future transport connections across the wider SL1 Growth Cell. The stormwater strategy uses Water Sensitive Urban Design principles, including on-lot retention or soakage, grass-lined swales, forebays and gravity-fed constructed wetlands, reducing reliance on pumped stormwater infrastructure and providing water quality, attenuation and ecological benefits. Infrastructure is staged so that existing network capacity is used efficiently before transition to future strategic upgrades. Core Controls also include permeable surface and landscape requirements that contribute to stormwater performance and urban greening. These measures are consistent with the intent of Policy 1.3.6.3.
1.3.6.3 To ensure high levels of energy and resource efficiency by: (a) Requiring roading layouts to achieve high levels of connectivity; and (b) Requiring all residential developments to be orientated to achieve maximum solar access for new dwellings; and (c) Where it is appropriate, requiring multi-modal transport options to be incorporated into developments and subdivisions; and (d) Encouraging infrastructure which takes account of the sustainability of the life cycle of the utility, for example, stormwater runoff, storage and treatment, the selection of construction materials, ongoing energy and maintenance costs, renewal opportunities for retention devices on individual sites, as well as the active incorporation of water conservation measures; and (e) Enabling the establishment of on-site renewable electricity generation systems, subject to the management of adverse effects.	
Policy Implement visions and strategies in Town Concept Plans	N/A – the proposed site is not located within a town centre concept plan.
1.3.6.4	

To enable the opportunities and outcomes in the Town Concept Plans subject to the provision of infrastructure and the adequate management of adverse effects.	
Section 4.3 - Rural Zone	
<i>Objective - Rural resources</i>	
Objective 4.3.1 To maintain or enhance the inherent life supporting capacity, health and well-being of rural land, ecosystems, soil and water resources.	The proposal has been informed by detailed assessments of soil, groundwater, freshwater ecology, stormwater and land stability and incorporates measures to protect the life supporting capacity and health of the receiving environment as the Site transitions to industrial use. The Site is highly modified, with existing industrial and waste management activities, artificial drainage, fill and consented bulk earthworks across substantial areas. The stormwater treatment train will improve the management of runoff through source controls, swales, forebays and constructed wetlands, while erosion and sediment controls will manage construction discharges. The EclA (refer to Industrial North - Appendix 23) identifies the artificial drains as negligible to low value and concludes that, following management, freshwater and terrestrial ecological effects will be low or very low with no significant residual effects. Groundwater effects are assessed as temporary and localised during construction and minor during operation. The proposal will permanently alter the rural soil resource and that tension is addressed under the specific productive-land provisions below. However, the actual soil resource is variable and constrained by peat, wetness, modification and fragmentation. Overall, the proposal appropriately manages the health and functioning of the remaining environmental resources and is broadly consistent with Objective 4.3.1.
Policy Avoid adverse effects on Water Catchment Areas	The proposal is supported by a comprehensive stormwater management approach and the staged construction of stormwater treatment wetlands. The proposed
4.3.1.2	stormwater management strategy will enable effective stormwater treatment and

To avoid, remedy or mitigate the adverse effects of development, subdivision and activities on Water Catchment Areas as identified on the Planning Maps.	attenuation and appropriately manage the potential effects of the proposed industrial development on the downstream receiving environment. The approach is detailed in the Infrastructure Report (Industrial North – Appendix 13) and Stormwater Management Plan (Industrial North – Appendix 14). The Industrial North stormwater system incorporates source controls, conveyance and treatment measures, stormwater wetlands, detention and controlled discharge. These measures will manage both stormwater quality and quantity generated from the increased impervious surfaces associated with the industrial development and minimise potential adverse effects on downstream water bodies. The proposal also incorporates indigenous and riparian planting associated with the existing drainage network and proposed stormwater wetlands. These measures will contribute to the management of stormwater effects while providing ecological and freshwater habitat enhancement within the existing highly modified environment.
Policy Avoid adverse effects on aquatic and riparian ecosystems (including lakes) 4.3.1.3 To avoid, remedy or mitigate adverse effects of development, subdivision and activities on the quality of the District’s ground and surface water resource, and promote the enhancement of their ecological and cultural values by: (a) Maintaining or enhancing the life supporting capacity of water bodies; and (b) Maintaining or enhancing the ability to use aquatic ecosystems as mahinga kai (a food source); and (c) Where appropriate, maintaining or enhancing the availability of water bodies for recreation; and (d) Enhancing ecological corridors and riparian margins. Advice Note: See also the objectives, policies and rules of the Waikato Regional Plan.	The Site contains a highly modified artificial drainage network rather than natural streams or natural inland wetlands. The EclA (refer to Industrial North – Appendix 23) identifies the artificial watercourses as having negligible to low ecological value and records shortfin eel as the only fish species captured within the Industrial North site. Nevertheless, potential effects on aquatic values have been specifically addressed. Fish salvage and relocation will occur before affected drains are reclaimed or diverted, and culverts will provide for fish passage where required. Construction related sediment effects will be managed through staged erosion and sediment controls. The permanent stormwater system will treat and attenuate runoff through source controls, swales, forebays and constructed wetlands before discharge to the receiving catchment. Indigenous and riparian planting around the new wetlands and drainage corridors will also provide additional aquatic and riparian habitat. The proposal is therefore considered consistent with Policy 4.3.1.2.

Policy Protect the rural soil resource	The proposal will result in the permanent conversion of the remaining rural soil resource and therefore does not retain the Site for farming. However, the detailed Soil and Land Use Capability Assessment (refer to Industrial North – Appendix 28) materially qualifies the regional scale understanding of the resource. Approximately 29.1 ha of the assessed Site is productive LUC 2-4 land, while the balance is modified LUC 7 soil or non-productive land. The productive component is predominantly peat or peaty soil affected by poor drainage, high groundwater and seasonal wetness, and none of the Site qualifies as 'High Class Soil' under the Waipā District Plan definition. The productive land is also fragmented by the Southern Links designation into disconnected blocks and affected by existing industrial activities, fill, artificial drainage and implemented bulk earthworks consents. These matters substantially constrain the practical long-term productive use of the Site. While the proposal changes the use of the soil resource, the effects on productive land have been specifically assessed and are addressed in greater detail under Objective 15.3.5 and the NPS-HPL assessment.
4.3.1.4 The versatility and life supporting capacity of the District's rural land and soil resource, particularly high class soils and peat soils, are protected from development, subdivision or activities that would prevent its future use for primary production, or its ability to maintain the District's ecological/biodiversity values.	
Policy Solid and liquid waste management	N/A – No storage or disposal of solid or liquid waste is proposed as part of the Industrial North development.
4.3.1.5 The storage and disposal of solid and liquid waste is undertaken in a manner that remedies or mitigates effects on the environment and adjacent properties that cannot be avoided. Advice Note: Rules relating to the location of disposal fields for domestic wastewater are found in Section 15 - Infrastructure, Natural Hazards, Development and Subdivision and in the Waikato Regional Plan. The Waikato Regional Plan also contains rules relating to discharges of solid and liquid waste to the environment.	Wastewater generated by the development will be managed through the proposed reticulated wastewater network rather than disposed of to land on-site. Accordingly, Policy 4.3.1.5 is not directly applicable to the proposal.
Policy Earthworks	

4.3.1.6 To ensure that earthworks are carried out in a manner that avoids adverse effects on infrastructure, between properties and on water bodies.	The proposal involves substantial bulk earthworks and ground improvement to establish stable industrial platforms and infrastructure corridors. The scale and staging of those works have been specifically assessed through the Infrastructure Report, Geotechnical Investigation and Earthworks/Construction Management Plans (refer to Industrial North – Appendix 13, 17 and 31). Erosion and sediment controls will be implemented in accordance with Waikato Regional Council guidance and staged so that exposed areas are limited, clean and dirty water are separated, sediment-laden runoff is treated and completed areas are progressively stabilised. Groundwater and settlement effects associated with peat and dewatering will be managed through engineered earthworks, preloading, targeted monitoring and trigger/action procedures. Contaminated soils will be separately managed under the Remediation Action Plans. These measures provide a comprehensive framework to avoid or minimise off-site sediment, instability and contamination effects and are considered consistent with Policy 4.3.1.4.
Objective - Rural activities: farming	
Objective 4.3.2 The capacity of rural areas and rural resources to support farming activities and lawfully established rural based activities is maintained.	The Land Use Capability Assessment (Industrial North – Appendix 28) identifies the capacity of the Industrial North site to support farming activities. The site includes LUC 2 land and is therefore treated as highly productive land under the transitional provisions of the NPS-HPL. The proposal will consequently result in the loss of land currently available for primary production. In this respect, there is some tension with Objective 4.3.2. Notwithstanding this, the site is located adjacent to the established Frankton industrial area and within the Hamilton Airport/Southern Links strategic industrial node identified for future industrial development. The site and wider SL1 Growth Cell are also increasingly separated from the wider productive rural environment by existing and planned urban development and the Hamilton Southern Links corridor.
Policy Management of rural resources	
4.3.2.1 Manage rural resources so that farming activities can continue to establish and operate.	
Policy Rural environment	
4.3.2.2	

Recognise and protect the continued operation of the Rural Zone as a pastoral working environment.	Overall, while the proposal will reduce the capacity of the site itself to support farming activities, concentrating industrial development within this strategically identified growth area assists in retaining other rural land that is better positioned to support primary production. Accordingly, the proposal has some tension with Objective 4.3.2, but this needs to be considered in the context of the strategic direction for industrial development of the site.
Policy Farming activities to avoid adverse effects	N/A – The proposal does not enable farming activities.
4.3.2.3 Manage farming activities so that they do not result in adverse effects on the environment or adjacent sites by ensuring: (a) Buildings are located appropriately; and (b) Adverse effects, are avoided, remedied or mitigated.	
Policy Farm buildings and activities to internalise adverse effects	
4.3.2.4 Farm buildings and activities shall be located and scaled to minimise adverse effects on rural character and amenity.	N/A – The proposal does not enable equine activities.
Policy Equine industry	
4.3.2.5 To enable the activities of the equine industry to be undertaken within the rural areas of the District.	
Policy Storage and processing of horticultural and agricultural produce grown on the holding	N/A – No storage or processing of horticultural or agricultural produce is proposed.
4.3.2.6	

To enable the storage and initial processing of horticultural or agricultural produce grown on the same holding as part of a farming activity.	
Policy Goat and deer fencing	N/A – No goat or deer fencing is proposed.
4.3.2.7 To ensure that good practice fencing standards for deer and goat populations are undertaken in proximity to significant natural areas.	
Objective - Rural character	
Objective 4.3.7 Rural character and amenity is maintained.	The proposal will establish industrial activities on land currently zoned Rural and therefore represents a departure from the activities generally anticipated within the Rural Zone. Notwithstanding this, Industrial North directly adjoins the established Frankton industrial area and is located within the Hamilton Airport/Southern Links strategic industrial node, which is identified for future industrial development. The proposal therefore represents a logical extension of existing industrial activities rather than dispersed industrial development within the wider rural environment. Overall, while there is some tension with Objective 4.3.7 due to the underlying Rural Zone, the proposal is supported by the more recent strategic direction for industrial development of the site.
Policies Rural character	
4.3.7.1 Land use activities should be at a density, scale, intensity and location to maintain rural character	
4.3.7.2 Rural character and associated amenity values shall be maintained by ensuring rural land uses predominate in the Rural Zone, and buildings are of an appropriate scale and location.	
4.3.7.3 Ribbon development or residential cluster development shall be avoided.	
Policy Character of Rangiaowhia Ridge	N/A- The site is not located in the Rangiaowhia Ridge.
4.3.7.4	

To maintain the open nature of the Rangiāowhia Ridge by managing the bulk and location of development.	
Policy Rural character of entrance roads	The proposed site is not located next to an entrance road to a town or village; however, the development does support the delineation between the urban and rural areas of the Waipa District and Hamilton City's urban fringe.
4.3.7.5 To preserve the rural character of entrance roads to towns and villages and maintain a distinct delineation between urban and rural areas by avoiding aggregations of buildings and non-farming uses.	The development of the site is supported by a strategic agreement to expand the urban periphery of Hamilton City Council to include the site for urban development as part of the strategic land agreement for the SL1 growth cell. The proposed industrial activity on the site is consistent with the RPS and the region's future development strategy and supports the strategic growth priorities for Hamilton City and Waipa District Council.
Policies Rural dwellings	N/A – no dwellings are proposed.
4.3.7.6 To maintain the rural character and to meet the anticipated future settlement pattern in the Rural Zone by limiting the number of dwellings in the Rural Zone.	
4.3.7.7 Any farm workers dwelling shall be directly associated with the scale and intensity of the farming activities on-site, and should not exceed one dwelling per 40ha of holding. Advice Note: Please also refer to Policy 15.3.4.3 – Avoiding subdivision of secondary dwellings.	N/A – No farm workers dwellings are proposed.
Policy Marae and papakāinga development	N/A- No marae or papakāinga are proposed.
4.3.7.8	

To enable sustainable marae and papakāinga development as a recognised part of rural character, subject to providing for adequate servicing and managing potential adverse effects.	
Policy Community centres	N/A – No community centres are proposed.
4.3.7.9 To enable the use and development of community centres (i.e. halls) as a recognised part of rural character where activities provide for the health and well-being of the community and service or support an identified local need	
Policy Temporary events	N/A – No temporary events are proposed.
4.3.7.10 Temporary events associated with rural character are enabled subject to control of potential and actual adverse effects.	
Policy Fortified sites	N/A – The site is not a fortified site; it does not include a platform or structure that would inhibit access by the police or any authorised officer.
4.3.7.11 To ensure that rural amenity is not adversely affected by the presence of fortified sites.	
Policy Rangiāowhia Ridge: building setback area	N/A – The site is not within the Rangiāowhia Ridge building setback area.
4.3.7.12 Buildings within the Rangiāowhia Ridge building setback area shall complement and maintain the low and open scale of existing development, particularly in relation to St Paul’s Church and other heritage buildings.	
Policy Relocated buildings	N/A – The proposal does not involve the relocation of any buildings on site.
4.3.7.13	

Relocated buildings shall not detract from the amenity of the area they are located within by ensuring that exterior maintenance and painting is undertaken.	
Policy Residential Based Visitor Accommodation	N/A – Residential visitor accommodation is not proposed.
4.3.7.14 Residential Based Visitor Accommodation is enabled where the scale of the activity is such that it: (a) Maintains rural character, including in the scale and design of buildings and their location on the site; and (b) Provides for on-site parking and vehicle manoeuvring areas; and (c) Mitigates adverse effects related to traffic generation, access and noise to the extent that they do not result in adverse effects on rural character and amenity or on the surrounding transport network; and (d) Internalises adverse effects and should not cause adverse effects that would result in farming activities being prevented or constrained from operating.	
Objective - Rural amenity: setbacks	
Objective 4.3.8 To maintain rural character and amenity and avoid reverse sensitivity effects.	The proposal will change the existing rural character of the site to an industrial environment. However, the site directly adjoins the established Frankton industrial area and is within the Hamilton Airport/Southern Links strategic industrial node identified for future industrial development. The proposed masterplan incorporates appropriate setbacks and landscape treatment along site boundaries to manage visual and amenity effects and provide separation from adjoining rural activities. These measures will also assist in avoiding reverse sensitivity effects on surrounding rural land.

	Overall, while the character of the site will change, the proposed setbacks and landscaping will appropriately manage effects on the amenity and operation of the surrounding rural environment.
Policy Transport network boundaries	The proposed Industrial North masterplan provides appropriate setbacks between buildings and road boundaries to maintain the safe and efficient operation of the transport network. Landscaping along key road boundaries will also assist in managing visual and amenity effects associated with the proposed industrial development.
4.3.8.1 Buildings and activities are set back from road boundaries and railway tracks to maintain safety, rural character and amenity, and to avoid reverse sensitivity effects.	The proposal has been designed to integrate with the existing road network and future Hamilton Southern Links corridor, with appropriate separation between industrial activities and transport infrastructure to avoid reverse sensitivity effects. Overall, the proposed setbacks and landscape treatments will appropriately manage safety, amenity and reverse sensitivity effects and are considered consistent with Policy 4.3.8.1.
Policy Internal boundaries	The proposed masterplan provides appropriate setbacks and landscape treatment along internal and external boundaries to manage amenity and potential reverse sensitivity effects between industrial activities and adjoining land uses.
4.3.8.2 Buildings and activities are set back from rear boundaries and side boundaries to maintain rural character and amenity and avoid reverse sensitivity effects.	The comprehensive masterplanned approach enables building locations, landscaping and boundary treatments to be coordinated across the development, rather than resulting in ad hoc development at sensitive interfaces. Overall, the proposed setbacks and landscape treatments will appropriately manage effects between adjoining activities and are considered consistent with Policy 4.3.8.2.
Policy Buildings, enclosures and pens for the keeping of animals	N/A – No farming activities are proposed.
4.3.8.3	

Enclosures for the housing, keeping, and/or feeding of animals are set back from boundaries to avoid adverse effects on adjoining sites.	
Objective - Rural amenity: noise and vibration	
Objective 4.3.10 To maintain rural amenity while enabling the operation of noise and vibration generating farming activities within the Rural Zone.	The proposed industrial activities will be subject to specific operational noise controls designed to protect surrounding amenity. The Noise and Vibration Assessment (Industrial North – Appendix 26) confirms that the relevant Rural Zone noise limits can be achieved at existing and potential rural notional boundaries and that Hamilton City Residential Zone receivers can also be protected to the corresponding residential standards. There are no proximate Rural Zone dwellings adjoining the Site, with the closest existing Rural Zone dwelling more than 800 m from the southern boundary. Within the precinct, a 65 dB LAeq limit is recommended between industrial lots to establish an appropriate industrial acoustic environment. Noise sensitive activities will be precluded to avoid creating new notional boundaries and reverse sensitivity constraints. These controls appropriately internalise industrial noise effects and are consistent with the amenity-management intent of Policy 4.3.10.2. N/A – No frost fans are proposed. N/A – No residential development is proposed.
Policy Noise: rural farming activities	
4.3.10.1 Enable the generation of noise and vibration arising from legitimate farming activities, while mitigating adverse effects as far as practicable.	
Policy Noise: rural activities	
4.3.10.2 To ensure that the adverse effects of noise generated by rural activities are avoided, remedied or mitigated.	
Policy Noise: frost fans	
4.3.10.3 Frost fans shall be located and operated to minimise adverse effects on adjacent properties.	
Policy Noise: reverse sensitivity: strategic roads and railways	
4.3.10.4 Dwellings and associated residential development located adjacent to strategic roads and/or railways shall provide sufficient acoustic treatment to protect the level of amenity anticipated in the Rural Zone.	
Objective - Non-farming activities	

Objective 4.3.12 Only non-farming activities that have a functional and compelling requirement to locate in the Rural Zone should be enabled to locate in the Rural Zone.	The proposal will establish industrial activities on Rural zoned land and those activities do not have a functional requirement to locate in the Rural Zone. There is therefore an acknowledged tension with Objective 4.3.12 when read solely through the operative zoning framework. However, Industrial North is not an isolated non farming activity in the wider countryside. It directly adjoins the established Frankton industrial area, is traversed by Southern Links and forms part of a growth cell identified through the subsequent regional and Future Proof strategic framework for future urbanisation. The development is comprehensive rather than ad hoc, with 22 serviced industrial lots, an integrated transport network, three-waters infrastructure, ecological and stormwater areas, and Core Controls managing built form and interfaces. The detailed soil assessment also demonstrates that the remaining productive land is constrained by peat, wetness, modification and fragmentation. Accordingly, the operative policy tension should be weighed in the context of the Site's subsequent strategic identification and its clear functional relationship with Hamilton's existing industrial edge.
Policies Non-farming activities	
4.3.12.1 To limit non-farming activities in rural areas except for activities that: (a) Have a functional and compelling reason to establish in a rural area; and (b) Do not result in any further loss of land from primary production purposes; and (c) Maintain rural character. Activities that do not meet these criteria should be accommodated in urban areas.	The proposal does not meet the first limb of Policy 4.3.12.1 because the industrial activities do not require a Rural Zone location and the development will permanently change the rural character and productive use of the Site. That conflict is acknowledged. However, the proposal consolidates urban industrial development at Hamilton's established industrial edge in a growth area subsequently identified for urbanisation, rather than introducing a stand-alone non-farming activity into the wider rural environment. The Site's productive function is already constrained by existing industrial uses, consented earthworks, peat and drainage limitations and the Southern Links

	designation. The comprehensive masterplan, landscape buffers, stormwater reserves, Core Controls and staged infrastructure strategy also ensure that effects on the remaining rural environment are managed and that the development does not create a ribbon or scattered pattern. In this context, the proposal is considered a planned urban transition rather than the type of dispersed rural non-farming activity the policy is primarily directed at.
4.3.12.2 The introduction of non-farming activities in rural areas shall not prevent or constrain intensive farming activities from operating.	The proposal has been designed to avoid constraining the operation of surrounding rural and industrial activities. The nearest existing Rural Zone dwelling is more than 800 m from the southern Site boundary, and the adjoining northern/eastern environment is already industrial or transport-related. Setbacks, landscape buffers and Core Controls manage the interface with remaining rural land, while operational noise conditions require industrial activities to meet the relevant Rural and Residential Zone limits at sensitive receivers. Importantly, noise sensitive activities will be precluded within the industrial precinct so that new sensitive receivers do not create reverse-sensitivity constraints on adjoining farming, established industrial activities, the NIMT railway or Southern Links. The proposal therefore internalises its principal operational effects and is not expected to prevent or materially constrain lawfully established rural activities from continuing.
Policy Reverse sensitivity	The proposal has been designed to avoid constraining the operation of surrounding rural and industrial activities. The nearest existing Rural Zone dwelling is more than 800 m from the southern Site boundary, and the adjoining northern/eastern environment is already industrial or transport related. Setbacks, landscape buffers and Core Controls manage the interface with remaining rural land, while operational noise conditions require industrial activities to meet the relevant Rural and Residential Zone limits at sensitive receivers.
4.3.12.3 Non-farming activities in rural areas shall internalise adverse effects and should not cause adverse effects that would result in farming activities being prevented or constrained from operating.	The proposal has been designed to avoid constraining the operation of surrounding rural and industrial activities. The nearest existing Rural Zone dwelling is more than 800 m from the southern Site boundary, and the adjoining northern/eastern environment is already industrial or transport related. Setbacks, landscape buffers and Core Controls manage the interface with remaining rural land, while operational noise conditions require industrial activities to meet the relevant Rural and Residential Zone limits at sensitive receivers.

	Importantly, noise sensitive activities will be precluded within the industrial precinct so that new sensitive receivers do not create reverse-sensitivity constraints on adjoining farming, established industrial activities, the NIMT railway or Southern Links. The proposal therefore internalises its principal operational effects and is not expected to prevent or materially constrain lawfully established rural activities from continuing.
Volume 1: Part E – District Wide Provisions	
Section 15.3 - Infrastructure, Hazards, Development and Subdivision	
<i>Objective - Integrated development: site design and layout</i>	
Objective 15.3.1 To achieve integrated development within the District, that contributes to creating sustainable communities and enhances key elements of character and amenity.	The proposal is considered consistent with Objective 15.3.1 because it has been developed through an integrated masterplanning process that responds to the Site's opportunities and constraints rather than treating subdivision, land use and infrastructure as separate components. The masterplan provides 22 industrial lots of varying sizes, a connected road hierarchy, walking and cycling facilities, three waters and utility infrastructure, stormwater wetlands and landscape interfaces within a coherent precinct. The Urban Design Assessment (refer to Industrial North – Appendix 10) concludes that the lot structure, frontage arrangements and Core Controls provide appropriate flexibility for industrial activities while managing streetscape, landscaping, screening, servicing and storage outcomes. The Landscape and Visual Assessment (refer to Industrial North – Appendix 12) identifies low adverse (less than minor) effects and a coherent blue-green framework of wetland, swale, frontage and street planting. Ecological, geotechnical, stormwater, transport and noise constraints have all informed the layout and proposed conditions. Overall, the proposal represents integrated development that supports a functional and sustainable industrial community while appropriately managing character and amenity.
Policy	

Understanding the constraints and opportunities of a site by undertaking a site and surrounding area analysis

15.3.1.1

Development and subdivision should integrate with and acknowledge the constraints and opportunities of the site and surrounding area.

The proposed Industrial North masterplan has been informed by a comprehensive analysis of the Site and its surrounding environment, ensuring that the subdivision layout, infrastructure network and development controls respond appropriately to identified constraints and opportunities. Technical investigations have addressed geotechnical conditions and peat settlement, flooding and stormwater, groundwater, ecology, contaminated land, transport, noise and vibration, landscape and visual effects, urban design and cultural values.

The masterplan responds to these matters through an integrated design approach. The existing drainage network and proposed stormwater system have been incorporated into the industrial lot and road layout, including dedicated drainage corridors, swales and constructed stormwater wetlands. These features also provide opportunities for indigenous and riparian planting, ecological enhancement and landscape relief within the future industrial environment. Geotechnical and peat constraints are addressed through staged ground improvement and appropriate development controls, while ecological values are managed through species specific management measures. Core Controls, landscaping and interface treatments will manage built form, servicing and amenity effects, particularly where development adjoins remaining rural land and other sensitive interfaces.

The masterplan also responds to the wider physical and strategic context of the Site, including the established Frankton industrial area to the north and east, the NIMT railway, the Hamilton Southern Links designation, surrounding rural land and the future development of the wider SL1 Growth Cell. The road and subdivision pattern has been designed to integrate with the existing transport network and provide for future connections, including to the Southern Links corridor, while recognising the Site's strong functional relationship with the adjoining Frankton industrial area.

Overall, the constraints, opportunities and characteristics of both the Site and surrounding area have directly informed the layout and design of Industrial North, resulting in a comprehensively planned development that provides for current

	functionality while enabling future integration with the wider urban and infrastructure network. The proposal is therefore considered consistent with Policy 15.3.1.1.
Policy Sustainable design and layout development principles	The development takes into consideration climate change, particularly through the management of flooding hazards via the proposed stormwater management strategy. The proposal also incorporates measures that support reduced greenhouse gas emissions, including walking and cycling connections throughout Industrial North that integrate with existing and planned active transport networks. Overall, the proposal incorporates sustainable design principles and measures that support energy efficiency and climate resilience.
15.3.1.2 Development and subdivision within the urban limits and the Large Lot Residential Zones, should occur in accordance with the principles of sustainable design, and enable energy efficiency.	
Policy Low impact design	Low impact and water sensitive design principles are embedded in the stormwater and landscape response. The treatment train includes on-lot retention or soakage, grass lined swales, forebays and three constructed wetlands providing water-quality treatment, extended detention, attenuation and flood storage. The system retains the initial abstraction volume, targets 75% total suspended solids removal and attenuates the 2 year and 10 year events to pre-development rates and the 100 year climate change event to no more than 80% of pre-development discharge. Existing external catchment flows and hydraulic connections are maintained through retained drainage corridors, diversion channels, culverts and overland-flow routes. Indigenous and riparian planting around wetlands and drainage areas also provides ecological and landscape benefits. This integrated approach is consistent with Policy 15.3.1.3.
15.3.1.3 The design and layout of development and subdivision should recognise the landform and processes of the natural environment of the site and surrounding land, and avoid or minimise alterations to the landform and ecosystems.	
Policy All zones: ensuring boundary adjustments and boundary relocations do not compromise amenity	N/A – No boundary adjustments or relocations are proposed.

15.3.1.4 Boundary adjustments and boundary relocations shall not create or increase any non compliance with rules for new lots in the zone within which the subdivision is taking place.	
<i>Objective - Integrated development: natural hazards and site suitability</i>	
Objective 15.3.2 To ensure that sites proposed as part of a development or subdivision will be capable of accommodating activities anticipated within the applicable zone.	The proposal is supported by detailed geotechnical, hydrogeological and stormwater investigations demonstrating that the Site can accommodate the proposed industrial activities subject to the identified engineering and management measures. The principal hazards and constraints include peat settlement, soft soils, seismic shaking and liquefaction potential, shallow groundwater and flooding. The engineering response includes preloading and ground improvement, engineered fill, lot specific foundation design, monitoring of groundwater and settlement, appropriate batter and wetland design, stormwater attenuation, flood storage, overland-flow corridors and minimum development levels. The NPS-NH risk assessment identifies elevated latent risks in some categories but confirms that these can be reduced to acceptable residual levels through the proposed controls. The Site is therefore considered suitable for the proposed industrial use, subject to the proposed conditions and detailed design.
Policy Land to be suitable for use	The suitability of the Site and relevant natural hazards have been assessed through the Geotechnical Investigation, Hydrogeological Assessment, Infrastructure Report and Stormwater Management Plan (refer to Industrial North – Appendices 13, 14,17 and 20). The main constraints are peat settlement and soft soils, shallow groundwater, seismic effects and flooding. These matters have directly informed development levels, earthworks, ground improvement, infrastructure design and the staging framework. Preloading, engineered fill and lot specific foundation design will manage settlement and liquefaction risks. Groundwater and settlement monitoring, including
15.3.2.1 Land to be developed or subdivided must be physically suitable to accommodate the permitted land use activities for that zone in accordance with the rules of this Plan.	

	trigger/action procedures, will manage dewatering and cross-boundary effects. Flood risk is addressed through stormwater wetlands, attenuation and flood storage, controlled discharge, maintained overland flow paths and minimum development levels. With these measures, the proposal provides a risk-based and proportionate response to natural hazards and the land is considered suitable for the intended industrial activities.
Policy Consideration of natural hazards	The suitability of the Site and relevant natural hazards have been assessed through the Geotechnical Investigation, Hydrogeological Assessment, Infrastructure Report and Stormwater Management Plan (refer to Industrial North – Appendices 13, 14, 17 and 20). The main constraints are peat settlement and soft soils, shallow groundwater, seismic effects and flooding. These matters have directly informed development levels, earthworks, ground improvement, infrastructure design and the staging framework.
15.3.2.2 Development and subdivision design should avoid natural hazards, or provide for the mitigation of the hazard within the development or subdivision design.	Preloading, engineered fill and lot-specific foundation design will manage settlement and liquefaction risks. Groundwater and settlement monitoring, including trigger/action procedures, will manage dewatering and cross-boundary effects. Flood risk is addressed through stormwater wetlands, attenuation and flood storage, controlled discharge, maintained overland-flow paths and minimum development levels. With these measures, the proposal provides a risk-based and proportionate response to natural hazards and the land is considered suitable for the intended industrial activities.
Policy Consideration of climate change	Climate change has been expressly incorporated into the stormwater and flood design. The Stormwater Management Plan (refer to Industrial North – Appendix 14) uses climate change adjusted rainfall assumptions for end-century conditions and assesses the 2 year, 10 year and 100 year events. The system is designed to attenuate the 100 year climate change event to no more than 80% of the pre-development

	discharge, with excess flows safely conveyed through road-based overland-flow paths and dedicated storage areas. The proposal is not exposed to coastal hazards or sea level rise. Its principal climate related risk is increased rainfall intensity and associated flooding, and this has been addressed through development levels, wetlands, attenuation, hydraulic connectivity and secondary-flow design. The proposal is therefore considered consistent with Policy 15.3.2.3.
15.3.2.3 Development and subdivision design should avoid areas that may be subject to the known effects of climate change, or provide for the mitigation of the effects of climate change within the development or subdivision design.	Climate change has been expressly incorporated into the stormwater and flood design. The Stormwater Management Plan (refer to Industrial North – Appendix 13) uses climate change adjusted rainfall assumptions for end-century conditions and assesses the 2 year, 10 year and 100 year events. The system is designed to attenuate the 100 year climate-change event to no more than 80% of the pre-development discharge, with excess flows safely conveyed through road-based overland-flow paths and dedicated storage areas. The proposal is not exposed to coastal hazards or sea-level rise. Its principal climate related risk is increased rainfall intensity and associated flooding, and this has been addressed through development levels, wetlands, attenuation, hydraulic connectivity and secondary-flow design. The proposal is therefore considered consistent with Policy 15.3.2.3.
Policy Consideration of reverse sensitivity	Reverse sensitivity and compatibility effects have been specifically addressed because the Site interfaces with established industrial activities, remaining rural land, the NIMT railway and the future Southern Links corridor. The Noise and Vibration Assessment confirms (refer to Industrial North – Appendix 26) that industrial activities can comply with the relevant Rural, Residential and Industrial Zone noise limits and recommends that noise-sensitive activities be precluded within the industrial precinct.
15.3.2.4 Development and subdivision design should not result in reverse sensitivity effects on adjacent sites, adjacent activities, or the wider receiving environment.	

	The Urban Design Core Controls provide setbacks, landscaping and screening at public and rural interfaces and manage outdoor storage, servicing and loading areas. Larger setbacks are provided adjoining the rail and Southern Links corridors. Together, these measures avoid introducing sensitive uses that could constrain existing or planned infrastructure and appropriately manage the effects of the industrial activities themselves.
Policy Dairy manufacturing sites	N/A – The site is not located in the vicinity of the Hautapu and Te Awamutu Dairy Manufacturing sites.
15.3.2.5 To ensure that the potential reverse sensitivity issues of locating new development in the vicinity of the Hautapu and Te Awamutu Dairy Manufacturing sites are taken into account.	
Policy Proximity to poultry farming activities	N/A – The site is not located near a poultry farm.
15.3.2.6 To ensure that the potential reverse sensitivity issues of locating new dwellings in the vicinity of a poultry farming activity are taken into account.	
Objective - Integrated development: efficient servicing	
Objective 15.3.3 Achieving the efficient and cost-effective servicing of land by ensuring that servicing is provided to areas proposed to be developed.	The proposal is considered consistent with Objective 15.3.3 because servicing has been planned as an integral part of the subdivision and staging framework. Transport, wastewater, water supply, stormwater, power and telecommunications are coordinated so that each stage can operate effectively while remaining compatible with the ultimate strategic network. The strategy makes efficient use of existing infrastructure where practicable and provides clear transitions to planned upgrades: • Wastewater storage and off-peak pumping manage downstream constraints;

	• Early water connections use existing Higgins Road and Wickham Street networks before future bulk supply; • Stormwater is managed primarily by gravity through a treatment train and constructed wetlands; and • transport access is coordinated with existing roads and future Southern Links. This approach avoids isolated or premature infrastructure expansion and supports both Industrial North and wider SL1 growth.
Policy Servicing requirements 15.3.3.1 All proposed urban development and subdivision shall be serviced to a level that will provide for the anticipated activities approved in a structure plan, or otherwise anticipated within the zone. Servicing requirements shall include: (a) Reserves for community, active and passive recreation; and (b) Pedestrian and cycle connections; and (c) Roads; and (d) Public transport infrastructure, e.g. bus stops; and (e) Telecommunications; and (f) Electricity; and (g) Stormwater collection, treatment and disposal; and (h) Wastewater treatment and reticulation, water provision for domestic and fire fighting purposes; and (i) Anticipating and providing for connections to identified adjacent future growth areas. Advice Note: There are significant servicing constraints in some areas of the District. Early discussion on the serviceability of a site is recommended.	The Industrial North proposal will be comprehensively serviced to support the anticipated industrial activities, with infrastructure planned and delivered as an integrated part of the staged development. The proposal includes five public roads, walking and cycling facilities, stormwater collection, treatment and attenuation infrastructure, wastewater pump stations and reticulation, potable water and firefighting supply, and underground power and telecommunications. The servicing strategy is staged so that each stage is provided with the infrastructure necessary to operate effectively, while also integrating with and providing for the ultimate strategic infrastructure network. Stormwater will be managed through an integrated treatment train approach incorporating source controls, retention or soakage where appropriate, swales, forebays and constructed wetlands to manage both water quality and quantity. Wastewater servicing will be provided through new pump stations and rising mains, incorporating storage and off-peak pumping to manage downstream network constraints. Potable water supply will similarly be delivered progressively, transitioning from existing network connections in the earlier stages to planned strategic infrastructure as development proceeds. These measures provide a

	coordinated and resilient three-waters servicing solution appropriate to the scale and staging of the development. The proposed road network has been designed to accommodate the functional requirements of an industrial precinct, including freight movements, while connecting with Higgins Road and Wickham Street and providing for future integration with the Hamilton Southern Links corridor. Walking and cycling facilities will be incorporated within the movement network and connect with existing and planned active-mode routes in the surrounding area. Power and telecommunications infrastructure will also be provided underground as part of the coordinated servicing of the precinct. Overall, the proposal demonstrates that Industrial North can be appropriately and efficiently serviced in a coordinated and staged manner, with infrastructure delivered alongside the development it serves and without compromising planned longer-term network solutions. The proposal is therefore considered consistent with Policy 15.3.3.1. The proposed servicing arrangements and staging are detailed in the Infrastructure Report (refer to Industrial North – Appendix 13).
Policy Co-ordination between servicing and development and subdivision	
15.3.3.2 Development and subdivisions shall: (a) Be located in areas where infrastructural capacity has been planned and funded; and (b) In areas subject to an approved structure plan, provide sufficient infrastructural capacity to meet the demand identified in the structure plan; and (c) Achieve the lot yield anticipated in an approved structure plan; and	New stormwater wetlands will be established to manage stormwater and transport infrastructure improvements will be undertaken to manage transport effects. The proposed transport improvements target the surrounding road network and provide for walking and cycling connections. The site is not subject to an approved structure plan. Notwithstanding this, the Industrial North development has been comprehensively masterplanned and infrastructure provision has been coordinated with the staged development of the site, including both strategic infrastructure and local connections.

(d) Include infrastructure provision for both the strategic infrastructure network and local infrastructure connections.	The development is also strategically aligned with the future Hamilton Southern Links Road of National Significance, with the proposed transport network designed to integrate with this future strategic infrastructure. Overall, the proposal coordinates subdivision and development with the infrastructure required to service it and is considered consistent with Policy 15.3.3.2.
Policies Roothing infrastructure	
15.3.3.3 The design, location, alignment, and dimensions of new roads shall ensure that safe vehicle, pedestrian, and cycling access and manoeuvring can be provided to every site/lot.	Proposed off-site infrastructure upgrades to key intersections within the surrounding road network will ensure that the additional traffic generated by Industrial North can be appropriately accommodated. All new roads within the development will be designed to provide safe and suitable vehicle, pedestrian and cycling access to each industrial lot. The proposed road network also integrates with Greenwood Street, Kahikatea Drive and the wider strategic transport network, with provision for active modes and future transport infrastructure. These matters are assessed in the Integrated Transport Assessment (refer to Industrial North – Appendix 16).
15.3.3.4 The roading pattern shall ensure connectivity to adjacent land identified as Deferred Zones or future growth areas, and the provision of public transport infrastructure, such as bus stops.	The proposed roading network connects into the existing road network surrounding the Industrial North site, including connections to Higgins Road, Wickham Street, Kahikatea Drive Extension, Kahikatea Drive and Greenwood Street. The site is also strategically located adjacent to the future Hamilton Southern Links corridor. The transport network provides for walking and cycling connections and has been designed to support future public transport provision. The Integrated Transport Assessment (refer to Industrial North – Appendix 16) recognises that increased uptake of public transport, walking and cycling will be progressively enabled through subdivision design, staged infrastructure delivery and wider strategic transport investment.

Policy Standard of infrastructure	The proposed transport network provides for walking and cycling connections throughout Industrial North, connecting the development with existing and planned pedestrian and cycle infrastructure within the surrounding transport network. The proposed road design incorporates pedestrian and cycle facilities to provide safe and convenient active transport connections for employees and visitors. These connections will also integrate with the wider SL1 Growth Cell and future strategic transport network, as detailed in the Integrated Transport Assessment (refer to Industrial North – Appendix 16).
15.3.3.5 Infrastructure services shall be provided to a standard that will allow the service to be extended to Deferred Zones or future growth areas.	
Objective - Urban consolidation	
Objective 15.3.4 To ensure urban consolidation will be achieved within the District, while also contributing to character and amenity outcomes.	The proposal supports urban consolidation by locating industrial development immediately adjacent to the existing Hamilton urban area and established Frankton industrial area, rather than providing for dispersed industrial development within the wider rural environment. Industrial North is located within the Hamilton Airport/Southern Links strategic industrial node, which is identified for future industrial development. The proposal therefore provides for a logical and consolidated extension of the existing urban environment in a location strategically identified for this purpose. The proposed masterplan also incorporates landscaping, setbacks, stormwater wetlands and a connected transport network to provide appropriate character and amenity outcomes within the future industrial environment and manage the interface with surrounding rural land. These measures are detailed in the Landscape Drawings and Design Statement (refer to Industrial North – Appendix 11 and 12). Overall, the proposal supports urban consolidation while providing appropriate character and amenity outcomes and is therefore considered consistent with Objective 15.3.4.
Policy	

Achieving density, design and character	The proposed subdivision provides a range of industrial lot sizes and dimensions that respond to the anticipated requirements of future industrial activities and enable efficient use of the Industrial North site. While the site is currently zoned Rural and the proposed lots therefore do not reflect the density outcomes anticipated by that zone, the subdivision has been comprehensively masterplanned to establish an industrial development within the Hamilton Airport/Southern Links strategic industrial node. Overall, the proposed lot sizes and dimensions are appropriate for the intended industrial character and function of the development. While there is some tension with the underlying Rural Zone provisions, the proposal is consistent with the strategic direction for future industrial development of the site.
15.3.4.1 The minimum and maximum lot size and dimension of vacant lots have been established so that they achieve the character and density outcomes of each zone.	
Policy Achieving sufficient development density to support the provision of infrastructure services	The Industrial North site is located outside the urban limits identified in the Waipā District Plan and therefore Policy 15.3.4.2 is not directly applicable to the proposal. Notwithstanding this, the proposed subdivision has been comprehensively masterplanned to provide industrial lot sizes and development yields that support the efficient provision and use of infrastructure across the site. Overall, while the specific maximum lot size direction of Policy 15.3.4.2 does not apply to the site, the proposal is broadly consistent with its underlying intent of achieving efficient development yields that support infrastructure provision.
15.3.4.2 Within the urban limits, where there is no structure plan, the maximum lot size for the zone shall be achieved in order provide a development yield to support infrastructure provision. For some developments where there are proven geotechnical constraints the maximum net lot area may be exceeded.	
Policy Subdivision of land containing a surplus dwelling	N/A – No residential lots are proposed.
15.3.4.4 To only provide for the subdivision of land containing a surplus dwelling where:	

(a) The surplus dwelling is demonstrably no longer required; and (b) The surplus dwelling does not create a demand for public infrastructure; and (c) The surplus dwelling does not result in reverse sensitivity effects on adjacent rural activities; and (d) The layout of the lot does not reduce the productivity of the land. Advice Note: See also Objective 15.3.5 and associated policies Integrated Development: reduce the fragmentation of rural land and retain rural land for production, and Policy 15.3.4.3 Subdivision of land containing a secondary dwelling.	
Policy Rural Zones: ensuring the productive potential of rural land	
15.3.4.6 The minimum rural lot size requirement has been established to ensure the productive potential of rural land is retained for a range of farming activities.	The proposed subdivision does not seek to retain the site for farming activities and will create lots below the minimum rural lot size. Accordingly, the proposal does not directly align with Policy 15.3.4.6, as the productive potential of the land within Industrial North will not be retained. Notwithstanding this, the site directly adjoins the established Frankton industrial area and is located within the Hamilton Airport/Southern Links strategic industrial node, which is identified for future industrial development. The subdivision is comprehensively masterplanned for industrial development rather than representing ad hoc fragmentation of the wider rural environment. Overall, there is some tension with Policy 15.3.4.6; however, this needs to be considered in the context of the more recent strategic direction for industrial development of the site.
Policy Rural Zones: maintaining amenity and rural character	
15.3.4.7	The proposed subdivision will change the existing rural character and amenity of the site through its development for industrial purposes. However, the proposal represents a comprehensively masterplanned extension of the existing Frankton

To ensure that development does not compromise the predominant character and amenity of the Rural Zone, subdivision design and layout shall: (a) Avoid de facto settlements such as ribbon, or residential cluster development; and (b) Maintain the visual and environmental values of the area, including but not limited to, maintaining the integrity of landscape areas and viewshafts; and (c) Not compromise the ecological functioning of significant natural areas, e.g. peat lakes and biodiversity (indigenous forest) corridors, as defined on the Planning Maps; and other areas of biodiversity value.	industrial area rather than ad hoc ribbon or clustered development within the wider Rural Zone. The site is not located within an identified significant landscape, viewshaft or Significant Natural Area. Landscape and visual effects will be managed through the proposed layout, setbacks and landscaping detailed in the Landscape Drawings and Design Statement (refer to Industrial North – Appendix 11 and 12). Ecological values have been assessed through the EclA (refer to Industrial North – Appendix 23), with measures proposed to manage effects on indigenous biodiversity and provide enhancement through indigenous and riparian planting and stormwater wetlands. Overall, while the proposal will change the rural character of the site, it avoids ad hoc rural development and appropriately manages landscape, amenity and ecological effects.
Policy Rural Zones: infrastructure 15.3.4.8 To ensure that development does not give rise to demand or potential demand for the uneconomical and unplanned expansion of infrastructure services, or the upgrade of existing infrastructure, by avoiding residential cluster, ad hoc and ribbon development.	The development has a comprehensive infrastructure strategy, including significant upgrades and investment in the existing infrastructure network. The proposed wastewater connections, water supply infrastructure and integrated approach to stormwater management ensure the SL1 Industrial North development appropriately contributes and ties into medium to longer-term infrastructure solutions. The proposed servicing approach is detailed in the Infrastructure Report (refer to Industrial North – Appendix 13). This is further evident through the proposed transport improvements, including upgrades to key intersections, walking and cycling connections and wider improvements to the surrounding transport corridors. The development is also strategically aligned with the future Hamilton Southern Links corridor. Overall, the proposal represents comprehensively planned development supported by coordinated infrastructure investment and will not result in uneconomic or

	unplanned expansion of infrastructure services. It is therefore considered consistent with Policy 15.3.4.8.
Policy Avoiding reverse sensitivity on adjacent zones and infrastructure	The proposed Industrial North development has been comprehensively planned to ensure it does not compromise the function of adjacent zones or existing and planned nationally or regionally significant infrastructure. The site directly adjoins the established Frankton industrial area, and appropriate setbacks, landscaping and boundary treatments will manage the interface with adjoining rural land. The development is also coordinated with the Hamilton Southern Links Road of National Significance, ensuring the operation and future development of this strategic transport corridor is not compromised. The development has a comprehensive infrastructure strategy, with water, wastewater, stormwater and transport infrastructure coordinated with the staged development of the site, as detailed in the Infrastructure Report (refer to Industrial North – Appendix 13).
15.3.4.11 Development and subdivision shall not compromise the function of adjacent zones, existing nationally or regionally significant infrastructure, or the provision of infrastructure and services.	
Objective - Integrated development: reduce the fragmentation of rural land and retain rural land for production	
Objective 15.3.5 To ensure that the primary productive potential of the rural land resource is retained and enhanced.	The proposal will permanently convert the remaining rural land within Industrial North to urban industrial use, so there is an acknowledged tension with Objective 15.3.5. However, the detailed Soil and Land Use Capability Assessment (refer to Industrial North – Appendix 28) demonstrates that the productive resource is materially more constrained than regional-scale mapping suggests. Approximately 29.1 ha of the assessed Site is productive LUC 2-4 land, while the balance comprises modified LUC 7 soils or non-productive land. The productive soils are predominantly peat or peaty soils affected by poor drainage, high groundwater and seasonal wetness. The remaining productive land is also fragmented by Southern Links into two disconnected blocks and affected by existing industrial activities, historical fill,

	artificial drainage and implemented bulk earthworks consents. None of the Site qualifies as 'High Class Soil' under the Waipā District Plan definition. These enduring constraints substantially reduce the practical ability of the Site to function as a cohesive, versatile primary production unit. The proposal instead consolidates industrial growth at Hamilton's existing industrial edge in a location subsequently identified for urbanisation, reducing pressure for equivalent development to occur across larger and more intact rural landholdings elsewhere. The specific tension with the objective is therefore materially moderated by the actual characteristics and strategic context of this Site.
Policy Maintaining productive potential of the rural land	The proposed industrial subdivision does not retain the Rural Zone's 40 ha minimum lot pattern and will convert the Site to a comprehensive industrial precinct. It therefore departs from the literal rural subdivision outcome sought by Policy 15.3.5.1. However, the subdivision is not creating small rural or rural residential holdings that would further fragment an otherwise viable farming unit. It creates a single, comprehensively planned urban industrial precinct with coordinated roads, three-waters infrastructure and defined long-term land use. The detailed land capability assessment (refer to Industrial North – Appendix 28) identifies only approximately 29.1 ha of productive LUC 2-4 land, constrained by peat, wetness, existing modification and Southern Links severance. The remaining productive area cannot function as a conventional stand-alone dairy unit. In that context, the proposal avoids the inefficient residual rural fragmentation that the policy is primarily directed at, notwithstanding the permanent change in land use.
15.3.5.1 To ensure the productive potential of the Rural Zone is retained by: (a) Maintaining a minimum rural lot size of 40ha; and (b) Limiting and controlling the location of smaller lots.	
Policy Ensuring boundary relocations and amalgamations maximise the productive potential of the zone and do not fragment rural land	N/A – No boundary relocations are proposed.
15.3.5.2 Boundary relocations and amalgamations, shall not:	

(a) Increase the number of dwellings (excluding farm workers dwellings) on the holding beyond one dwelling per 40ha; and (b) Create a lot layout that reduces the productivity of the land; and (c) Create ad-hoc, ribbon development or residential cluster development; and (d) Create a demand for public infrastructure; and (e) Result in reverse sensitivity effects on adjacent rural activities.	
Policy High class soils	
15.3.5.3 To protect high class soils from fragmentation by: (a) Ensuring that rural lot sizes can accommodate a range of farming activities; and (b) Allowing limited adjustment or relocation of title boundaries within a holding or between holdings, that result in more efficient use of high class soils; and (c) Ensuring that subdivision rights transfer to non-sensitive locations as specified in this Plan; and (d) Restricting the use of high class soils for activities other than primary production; and (e) Restricting the level of impermeable surfaces on high class soils; and (f) Facilitating and encouraging the amalgamation of small titles.	The detailed Soil and Land Use Capability Assessment (refer to Industrial North – Appendix 28) confirms that none of the Industrial North Site meets the Waipā District Plan definition of 'High Class Soil'. Although regional-scale NZLRI mapping identifies much of the Site as LUC Class 2 for the transitional NPS-HPL framework, the District Plan definition expressly excludes peat soils from the relevant LUC 1 and 2 category, and the other specified high-class soil categories are not present. The site specific assessment also identifies substantial modified and non-productive areas and significant wetness and drainage limitations. Accordingly, the proposal does not fragment a District Plan-defined high-class soil resource. The separate NPS-HPL assessment addresses the broader national highly productive land provisions and transitional mapping.
Policy Peat soils	
15.3.5.4 To protect peat soils by: (a) Recognising that peat soils may limit the location of development; and (b) Recognising the productive capacity of peat soils; and	Peat soils are a defining physical constraint across substantial parts of the Industrial North site and have been specifically recognised in both the geotechnical and land capability assessments. The peat is associated with shallow groundwater, poor drainage, settlement and long-term subsidence risks and has materially influenced the development levels, earthworks strategy, ground improvement and infrastructure design.

(c) Encouraging the sustainable management and where possible, the enhancement of peat soils.	The engineering response includes preloading, engineered fill, settlement and groundwater monitoring and foundation design appropriate to the residual ground conditions. The land capability assessment (refer to Industrial North – Appendix 28) also recognises the productive limitations of the peat soils and the need to avoid assuming that deeper drainage is a simple means of increasing productivity, given the associated oxidation and subsidence risk. While the proposal will convert the Site from rural production, the characteristics and limitations of the peat resource have been expressly considered and will be managed through the proposed engineering and monitoring framework.
Objective – Subdivision in areas that are not serviced	
Objective 15.3.6 Avoid significant adverse effects on people, property, infrastructure and the environment arising from any subdivision in areas that are not serviced by Council infrastructure.	N/A – The site is serviced.
Policy Health and safety on rural properties	
15.3.6.1 Health and safety for residents in areas that are not serviced by Council infrastructure should be provided through appropriate design and mitigation measures.	
Objective - Integrated development: environmental enhancement	
Objective 15.3.7 Maintain and enhance the District’s natural environment, including the natural functioning of the environment, natural features and landscapes, and significant natural areas.	The proposal is considered consistent with Objective 15.3.7 because the masterplan integrates environmental management and enhancement with the industrial subdivision. The Site is presently a highly modified rural industrial edge with limited indigenous vegetation, artificial drainage and existing hardstand and industrial uses. The proposal will establish three planted stormwater wetlands, riparian and indigenous planting, swales and landscape corridors that provide stormwater, ecological and landscape functions. Species specific management plans address bats,

	birds, lizards and freshwater fish, and the EclA (refer to Industrial North – Appendix 23) concludes that post management effects will be very low to low with no significant residual effects. The Landscape and Visual Assessment (refer to Industrial North – Appendix 12) also concludes that landscape and visual effects will be low adverse (less than minor). These measures improve habitat diversity, ecological connectivity and the legibility of the blue-green network while managing the effects of industrialisation, supporting the maintenance and enhancement outcome sought by Objective 15.3.7.
Policy Minimise impacts on the natural environment: low impact design methods	The development uses an integrated low impact and Water Sensitive Urban Design approach to minimise effects on the natural environment. Stormwater source controls, initial abstraction retention/soakage, grass lined swales, forebays and constructed wetlands manage runoff quality and quantity, while retained drainage corridors and overland-flow paths preserve hydraulic connectivity. The same blue-green system is used to deliver ecological and landscape benefits through indigenous and riparian planting and habitat enhancement. Construction effects are managed through erosion and sediment controls and species-specific ecological plans. This approach reduces reliance on purely engineered end of pipe solutions and embeds environmental function into the subdivision structure, consistent with Policy 15.3.7.1.
15.3.7.1 To maintain and enhance the natural environment, the existing land forms, vegetation, and water bodies, through the use of low impact design methods at the time of development and subdivision.	
Policies Minimising adverse effects on the landscapes, protected trees, and natural areas identified in this Plan, at time of development and subdivision	
15.3.7.2 To maintain and enhance the landscape values stated in this Plan, for the identified landscapes on the Planning Maps, by avoiding development and subdivision patterns that would lead to the inappropriate siting of buildings, associated infrastructure, or driveways in identified landscape areas,	N/A – No identified landscape areas, viewshafts, SNA's, SEA's or other areas of biological or ecological value are identified on the planning maps for this site.

viewshafts, significant natural areas, or other areas of biodiversity or ecological value.	
15.3.7.3 To protect trees which have been identified in this Plan as having high historic, botanic, or amenity value by avoiding development and subdivision patterns that would lead to the inappropriate siting of buildings and lot boundaries within the Root Protection Zone of a Protected Tree.	N/A – No protected trees are listed on site.
Policies Achieving the permanent protection of the natural environment	
15.3.7.4 To achieve the permanent protection of identified significant natural areas, Maungatautari Ecological Island, ecological features, lakes and water bodies, the Te Awa Cycleway route and any Incentivised Cycleway, through the incentive of an environmental benefit lot.	N/A – The site does not feature any of these features and an environmental benefit lot is not proposed.
15.3.7.5 Incentivised Cycleways may be created by Council resolution once Council is satisfied that granting environmental benefit lot eligibility for that cycleway is consistent with the District Plan, Regional Policy Statement and any Council, regional, or sub-regional, growth strategy.	N/A –an environmental benefit lot is not proposed.
Policy Managing the future effects of development and subdivision on lakes and water bodies	The layout and design of Industrial North have considered the existing drainage network and associated freshwater and ecological values within the site. The proposed stormwater management strategy incorporates new stormwater wetlands, treatment and attenuation measures to appropriately manage the effects of development on downstream water bodies.
15.3.7.6 To ensure that the layout and design of subdivision and subsequent development and any development on a site acknowledges and avoids adverse effects on the sensitive environment of the water bodies.	Indigenous and riparian planting is also proposed in association with the drainage network and stormwater wetlands, providing opportunities to enhance freshwater habitat and ecological values. Potential effects on indigenous freshwater species will

	be managed through the EclA (refer to Industrial North - Appendix 23) and Ecological Management Plans (refer to Industrial North - Appendix 23). The proposed stormwater response is detailed in the Infrastructure Report (refer to Industrial North - Appendix 13) and Stormwater Management Plan (refer to Industrial North - Appendix 14).
Policy Identification of sensitive locations	N/A – The proposed site is not in a sensitive location.
15.3.7.7 Subdivision entitlement that creates an additional lot in identified sensitive locations shall be directed to less sensitive locations as specified in this Plan.	
Policy Additional subdivision opportunities in limited circumstances to permanently protect important areas of biodiversity value	The Industrial North site does not contain an identified Significant Natural Area and is not located within the other priority areas identified by the policy. Accordingly, Policy 15.3.7.8 is of limited direct relevance to the proposed subdivision.
15.3.7.8 Consider additional subdivision opportunities where significant biodiversity gains can be achieved in the following priority areas or locations: (a) Peat lakes and rivers: by permanently providing significant buffer areas around peat lakes and rivers; or (b) Wetlands, kahikatea stands, riparian margins and bush stands on the low lands, by providing permanent protection; or (c) Significant natural areas on the forested lower slopes of the western hills of Pirongia, the Kapamahunga Range, Maungatautari, Kakepuku, Maungakawa, Te Miro, and Te Tapui being permanently protected; or (d) Significant natural areas being aggregated to form one large more ecologically sustainable area and being permanently protected; or (e) Biodiversity corridors: by the permanent protection of significant areas of indigenous forest within biodiversity (indigenous forest) corridors; or	Notwithstanding this, the proposal will provide biodiversity gains through indigenous and riparian planting associated with the existing drainage network and the establishment and planting of new stormwater wetlands. These measures will increase habitat and improve ecological connectivity within the currently highly modified site, as detailed in the EclA (refer to Industrial North - Appendix 23).

(f) Biodiversity corridors: by permanently protecting significant riparian or wetland areas within the identified biodiversity (river or stream) corridors.	
Objective - Maintaining cultural landscapes	
Objective 15.3.8 To maintain the District’s cultural landscapes, identified in this Plan.	Extensive consultation with Tangata Whenua has been undertaken as part of the preparation of the Southern Links 1 substantive application, as further detailed in the Engagement and Consultation Report included at Industrial North Planning Attachment 2 . A Cultural Impact Assessment (refer to Industrial North – Appendix 24) and letters of support have been provided by Ngaati Wairere, Ngaati Maahanga, Ngaati Tamainupoo, Ngaati Hauaa, Ngaati Koroki-Kahukura and Ngaati Apakura. Overall, it is considered that the proposal gives effect to Treaty principles by partnering with tangata whenua and providing genuine, practical opportunities for iwi and hapū to exercise kaitiakitanga over indigenous biodiversity within and around the development site. This supports both environmental outcomes and cultural wellbeing.
Policy Manage adverse effects on the values of the cultural landscape	
15.3.8.1 To maintain the values of the cultural landscapes identified in this Plan, the layout and design of development and subdivision should not result in buildings, earthworks and wastewater systems adversely affecting the cultural values of the landscape.	
Objective - Protection of cultural sites, and archaeological sites	
Objective 15.3.9 To protect the District’s cultural sites identified in this Plan and to manage the effects of development and subdivision on archaeological sites.	No specific cultural sites as identified within the CVA, and ongoing partnership with iwi and hapu is continuing, through the tangata whenua working group. A Cultural Impact Assessment and letters of support have been provided by Ngaati Wairere, Ngaati Maahanga, Ngaati Tamainupoo, Ngaati Hauaa, Ngaati Koroki-Kahukura and Ngaati Apakura. Overall, it is considered that the proposal gives effect to Treaty principles by partnering with tangata whenua and providing genuine, practical opportunities for iwi and hapū to exercise kaitiakitanga over indigenous biodiversity within and around the development site. This supports both environmental outcomes and cultural wellbeing.
Policy Avoid disturbance of cultural sites	

15.3.9.1 To manage the actual and potential effects on cultural sites by assessing the layout and design of development and subdivision including buildings, earthworks, infrastructure and driveways within 20m of the boundary of an identified cultural site(s) to ensure that sites are not disturbed.	N/A. No significant cultural sites identified, notwithstanding this, a focus on water bodies and separation, earthwork controls and cultural considerations have been adopted.
Policy Management of effects on archaeological sites	N/A. Accidental discovery protocols have been adopted, as per HNZPT advice and the Archaeological Report, refer Industrial North – Appendix 25 .
15.3.9.2 To manage effects on the archaeological resource of the District at the time of development and subdivision.	
Policy Management of cultural sites and archaeological sites at the time of subdivision	
15.3.9.3 To retain cultural sites and archaeological sites within one lot, where practicable or possible.	
Objective - Protection of heritage items	
Objective 15.3.10 To protect the District's heritage items identified in this Plan.	N/A.
Policies Avoid adverse effects on heritage items	
15.3.10.1 To enable the protection of the heritage items identified in this Plan, development and subdivision layout and design should not result in the location of buildings adversely affecting the heritage item and their surroundings.	
15.3.10.2 To retain heritage items and their surroundings within one lot.	

<i>Objective - Provision of reserves</i>	
Objective 15.3.11 To ensure the ongoing provision of reserves through the subdivision process, including opportunities to add land to existing reserves or land owned by Council, to enhance or provide for public recreation, conservation and amenity needs. Local purpose reserves may also need to be provided at the time of subdivision.	The Industrial North development is primarily an industrial subdivision and does not generate the same demand for neighbourhood reserves and recreational open space as residential development. Notwithstanding this, the masterplan incorporates open space associated with the stormwater network, including new stormwater wetlands, drainage corridors and associated landscaping. These areas will provide amenity and ecological benefits within the development, while local purpose reserves will be provided where required to accommodate infrastructure. The proposed walking and cycling network will also provide connections through the site and to the wider transport and open space network.
Policy Ensuring each greenfield subdivision provides reserve areas	
15.3.11.1 To ensure that subdivision processes to create new lots, contribute to the provision of reserves within the District.	
Policies Reserve location and design	
15.3.11.2 All urban neighbourhood reserves and sports reserves shall be designed and located to ensure that they are of shape, size, and contour to provide for the anticipated recreational demands of the community and District, and can be accessed by both pedestrians and vehicles.	
15.3.11.3 All conservation reserves shall recognise an existing natural feature, or contribute to the protection or access to the natural feature.	N/A.
15.3.11.4 In the instances where a reserve serves a dual function, for example a local purpose reserve, this shall be recognised within the layout and design of the subdivision.	All dual purpose reserves are identified as such, and notated on the scheme plan. This includes the local purpose reserve with riparian planting, where accessibility for amenity and recreation is included, whilst providing wider attention and
Policy Securing land adjoining or adjacent to existing reserves	N/A
15.3.11.5	

Subdivisions in an area that either adjoin or are adjacent to an identified significant recreation or conservation reserve as identified in Appendix O5, shall contribute to the improved functioning and use of that reserve, including access to the reserve, ecological enhancement within the reserve, or improved passive surveillance through the addition of residential activity adjoining the reserve.	
Objective - Provision of esplanade reserves	
Objective 15.3.12 To ensure that subdivision of properties adjoining lakes and rivers provide for public access, and associated riparian benefits, where required.	N/A
Policy Esplanade reserves, esplanade strips, and access strips	
15.3.12.1 To ensure esplanade reserves, esplanade strips, and access strips are provided at the time of subdivision, where relevant, along the margins of lakes and rivers. Advice Note: See the Act for other instances where esplanade reserves, and access strips are required	
Policy Enhanced public access to the District's lakes and rivers	
15.3.12.2 Enhancing public access to the District's lakes and rivers by requiring esplanade reserves, strips, or access strips.	
Policy Contribute to natural functioning adjoining lakes and rivers	The existing drainage features within the Industrial North site have been considered as part of the subdivision design and the wider stormwater and ecological response.
15.3.12.3 Contribute to the maintenance and enhancement of natural functioning, water quality and habitats adjoining lakes and rivers by requiring esplanade reserves, esplanade strips or access strips.	While the proposal does not rely on esplanade reserves or strips as the primary mechanism for achieving freshwater enhancement, the development incorporates riparian planting, new stormwater wetlands and ecological enhancement measures

	that will contribute to maintaining and enhancing natural functioning, water quality and freshwater habitat. These measures are detailed in the Stormwater Management Plan (refer to Industrial North – Appendix 14) and EclA (refer to Industrial North – Appendix 23).
Objective - Giving effect to Te Ture Whaimana	
Objective 15.3.13 To ensure that Te Ture Whaimana is given effect to by all development and subdivision.	The proposal has been developed to recognise and give effect to Te Ture Whaimana o Te Awa o Waikato, including through the integrated management of land, freshwater, stormwater and ecological values within the wider Waikato River catchment. Engagement with tangata whenua has been undertaken through the SL1 Tangata Whenua Working Group, with cultural values and aspirations informing the planning and environmental management of the proposal. This is detailed in the Engagement and Consultation Report (Industrial North Planning Attachment 2) and Cultural Impact Assessment (refer to Industrial North – Appendix 24). The proposal also incorporates stormwater treatment and attenuation, new stormwater wetlands, riparian and indigenous planting and ecological enhancement measures that will assist in protecting downstream freshwater values and the health and wellbeing of the wider Waikato River catchment. Overall, the proposal recognises the relationship of tangata whenua with freshwater and incorporates measures to protect and enhance freshwater and ecological values.
Policy Maintaining the health and well-being of land and water bodies	
15.3.13.1 To give effect to the directions and outcomes in Te Ture Whaimana and the Waipā River Accord, by ensuring that all development and subdivision shall include the following elements: (a) Low impact design for stormwater, drainage and earthworks; and (b) Building setbacks from lakes and water bodies; and (c) Access to water bodies where appropriate; and (d) Provision for the Te Awa Cycleway, where relevant; and (e) Minimal indigenous vegetation removal and requirements for restoration and enhancement of indigenous vegetation and natural character; and (f) Restricting locations of earthworks, building and wastewater systems within cultural landscapes.	
Objective - Existing consent notices, bonds and other legal instruments	
Objective 15.3.14	

To ensure the integrity of existing consent notices that regulate further subdivision and that are registered on the certificates of titles of land within the District.	Where relevant, any existing consent notices will be removed and appropriate interests will be registered on certificates of title.
Policy Maintaining existing consents notices, bonds and other legal instruments	
15.3.14.1 To avoid fragmentation of the land resource by ensuring that subdivision processes continue to enforce historic restrictions that have been placed on certificates of titles.	Where relevant, existing consent notices or other legal instruments registered on the certificates of title will be appropriately addressed through the subdivision process, with appropriate interests registered on the new titles. The Hamilton Southern Links designation and planned urbanisation of the wider SL1 Growth Cell already influence the relationship of Industrial North with the wider rural land resource. The proposal provides for comprehensively planned industrial development within an area identified in the region's future development strategy for industrial growth, ensuring development is strategic and coordinated rather than resulting in ad hoc fragmentation of the wider rural environment.
Section 16.3 - Transportation	
<i>Objective - Ensuring sustainable, integrated, safe, efficient and affordable multi-modal land transport systems</i>	
Objective 16.3.1 All new development, subdivision and transport infrastructure shall be designed and developed to contribute to a sustainable, safe, integrated, efficient (including energy efficient network design), accessible and affordable multi-modal land transport system.	The proposal is considered consistent with Objective 16.3.1. The Industrial North transport network is designed as an integrated hierarchy serving freight, service vehicles, workers, pedestrians and cyclists and connecting with both existing and future strategic networks. Access is provided through Higgins Road and Wickham Street, with the Kahikatea Drive extension and future Southern Links interface forming part of the wider transport strategy. The 22 industrial lots are served by public roads designed for industrial vehicle movements, while footpaths and shared walking/cycling facilities provide active-mode choice and future connections across the wider SL1 Growth Cell. The transport assessment (refer to Industrial North – Appendix 16) addresses intersection performance, safety and staging, and detailed Southern Links interfaces will be

	coordinated with NZTA and Hamilton City Council. The proposal therefore supports a safe, integrated and efficient multi-modal transport system.
Policy Design elements	The proposed transport network has been designed to integrate land use and transport planning and provide safe and efficient movement for vehicles, freight, pedestrians and cyclists. The road layout reflects the intended road hierarchy and provides appropriate connections to the surrounding transport network. Transport improvements will be undertaken to manage the additional traffic generated by Industrial North, including upgrades to local intersections and key roundabouts. The development also provides walking and cycling connections that integrate with existing and planned active transport networks, encouraging alternative modes of transport. The location of Industrial North adjacent to the established Frankton industrial area and strategically aligned with the future Hamilton Southern Links corridor will also support efficient freight movement and accessibility to the wider strategic transport network. These matters are detailed in the Integrated Transport Assessment (refer to Industrial North – Appendix 16).
16.3.1.1 Development, subdivision and transport infrastructure shall be designed and located to: (a) Minimise energy consumption in construction, maintenance and operation of the network; and (b) Accommodate and encourage alternative modes of transport; and (c) Give effect to the road hierarchy; and i. Contribute to: ii. Integrated transport and land use planning and a safe road system approach; and iii. Reducing deaths and serious injuries on roads; and iv. An effective and efficient road network; and v. Efficient movement of freight; and vi. Providing good accessibility for people.	
Policy Ensuring future connections	The proposed Industrial North transport network will connect with the existing surrounding road network and provide walking and cycling connections that integrate with existing and planned active transport infrastructure. The development has also been designed to accommodate future transport connections associated with the wider SL1 Growth Cell and is strategically aligned with the future Hamilton Southern Links Road of National Significance. The proposed road hierarchy and active mode connections will enable integration with future growth areas and provide opportunities for future passenger transport services.
16.3.1.2 Development, subdivision and transport infrastructure shall be designed and located to: (a) Link to existing transport networks, including roads, walking, cycling and passenger transport; and (b) Accommodate future transport network connections and walking, cycling and passenger transport options to Deferred Zones and future growth areas.	

	These transport connections and improvements are detailed in the Integrated Transport Assessment (refer to Industrial North – Appendix 16).
Policy The timing and availability of planned funding for transport infrastructure	The development of Industrial North will be coordinated with the staged delivery of the transport infrastructure required to support the development. Transport improvements will be undertaken as required to manage the effects generated by each stage, including upgrades to local intersections and key roundabouts and improvements to walking and cycling infrastructure.
16.3.1.3 The provision of transport infrastructure for any development or subdivision shall be managed in such a way that it takes into account the timing and availability of planned funding for transport infrastructure.	The proposed transport strategy also recognises the timing of wider planned transport investment, including the future Hamilton Southern Links Road of National Significance, and provides a transport network that can integrate with this infrastructure as it is delivered. The proposed staging and transport improvements are detailed in the Integrated Transport Assessment (refer to Industrial North – Appendix 16).
<i>Objective - Integrating land use and transport: ensuring a pattern of land uses and a land transport system which is safe, effective and compatible</i>	
Objective 16.3.2 Land use and transport systems successfully interface with each other through attention to design, safety and amenity.	The land use and transport strategy has been developed together so that the proposed industrial activities are compatible with the function and safety of the surrounding network. Industrial lots are arranged around a clear road hierarchy and future Southern Links interface, with access, freight movement, active modes and servicing considered at masterplan stage rather than left to individual lots. The proposal is also compatible with the noise environment created by the NIMT railway and future Southern Links because noise-sensitive activities are excluded from the industrial precinct. Landscape and frontage controls manage the visual and amenity relationship between roads and industrial development. Overall, the proposal achieves an appropriate interface between land use and transport and is consistent with Objective 16.3.2.

Policy Integrating land use and transport	The Industrial North transport network has been designed to provide safe and appropriate access while minimising potential conflicts with the surrounding arterial road network. Proposed intersection and road upgrades will manage additional traffic generated by the development and maintain the safe and efficient operation of the wider network. The development provides safe access for all road users, including walking and cycling connections throughout the site. Its location adjacent to the existing Frankton industrial area and within the Hamilton Airport/Southern Links strategic industrial node also supports integration between industrial land use and the strategic transport network, including efficient freight movements. The Integrated Transport Assessment (refer to Industrial North – Appendix 16) also provides for travel demand management through active transport connections and future opportunities for public transport.
16.3.2.1 Development, subdivision and transport infrastructure shall be located, designed and managed to: (a) Minimise conflict on and across arterial routes and provide appropriate access; and (b) Include access that is safe and appropriate for all road users, including those with restricted mobility; and (c) Minimise the need for travel and transport where practicable; and (d) Facilitate travel demand management opportunities where practicable.	
Policy Enhancing pedestrian safety	The Industrial North development is not located in proximity to a school or significant community facility. However, given the scale of the proposed industrial development, a safe and connected pedestrian network is provided throughout the site.
16.3.2.2 To improve pedestrian safety in proximity to schools and other community facilities, and commercial areas including pedestrian frontage areas; the standard of pedestrian networks shall be enhanced to accommodate and encourage greater use.	The proposed transport network incorporates footpaths, shared paths and pedestrian crossing facilities that connect with the surrounding walking and cycling network and provide safe pedestrian access for employees and visitors. These measures are detailed in the Integrated Transport Assessment (refer to Industrial North – Appendix 16).
Policy Safe roads	The Industrial North transport network has been designed to provide a safe road environment for vehicles, pedestrians and cyclists. Vehicle access points, internal roads, pedestrian paths and cycle routes have been located and designed to minimise potential conflicts between transport modes.
16.3.2.3 Development and subdivision design and construction shall contribute to a safe road environment, by:	

(a) Providing safe and appropriate locations for vehicle entrances, driveways, pedestrian and cycle routes; and (b) Designing and locating transport networks, lighting, street furniture and landscaping to minimise conflict, maintain visibility, and provide for maintenance activities.	The proposed road layout, intersection treatments, lighting, landscaping and pedestrian and cycling facilities will maintain appropriate visibility and provide for the safe and efficient operation of the transport network. These matters are detailed in the Integrated Transport Assessment (refer to Industrial North – Appendix 16).
Policy Managing effects on character and amenity	
16.3.2.4 Development, subdivision and transport infrastructure shall be located, designed and managed to: (a) Avoid, remedy, or mitigate adverse effects of transport on character and amenity; and (b) Facilitate opportunities to enhance character and amenity; and (c) Ensure that the outcomes sought in the Waipā Growth Strategy, Town Concept Plan 2010 Plans, and the Character Precinct statements in Section 6 – Commercial Zone of this Plan are achieved. Advice Note: The Character Descriptions in Appendix DG2 to DG6 contain a description of the existing character of each precinct area and a series of design statements. Section 21.2.6.1 contains the information requirements for a Site Analysis Statement: Precinct Areas.	The proposed transport network has been integrated with the Industrial North masterplan to appropriately manage potential effects on character and amenity. Landscaping along road corridors, site boundaries and key interfaces will assist in integrating transport infrastructure within the future industrial environment and provide opportunities to enhance amenity. The proposal will change the existing rural character of the site; however, this occurs adjacent to the established Frankton industrial area and within an area strategically identified for future industrial development. The transport network will contribute to a coherent and well-connected industrial environment, as detailed in the Integrated Transport Assessment (refer to Industrial North – Appendix 16) and Landscape Drawings and Design Statement (refer to Industrial North – Appendix 11 and 12). The specific references to Town Concept Plans and Commercial Zone Character Precincts are not directly relevant to Industrial North.
Objective - Maintaining transport network efficiency	
Objective 16.3.3 To maintain the ability of the transport network to distribute people and goods safely, efficiently and effectively.	The proposed Industrial North transport network has been designed to ensure the safe, efficient and effective movement of people and goods. The development includes upgrades to key intersections and the surrounding road network to appropriately manage the additional traffic generated by the proposal. The site's location adjacent to the established Frankton industrial area and future Hamilton Southern Links corridor supports efficient freight movement and access to

	the wider strategic transport network. Walking and cycling connections are also incorporated to provide alternative transport choices for employees and visitors. These matters are detailed in the Integrated Transport Assessment (refer to Industrial North – Appendix 16).
Policy Effects of development or subdivision on the transport network	The potential effects of Industrial North on the operation and maintenance of the transport network, including the volume and nature of traffic generated by the proposed industrial activities and associated freight movements, have been assessed in the Integrated Transport Assessment (refer to Industrial North – Appendix 16). Transport improvements, including upgrades to key intersections and the surrounding road network, are proposed to ensure that additional traffic can be safely and efficiently accommodated. Stormwater generated from the proposed transport network will also be appropriately collected, treated and managed through the development's stormwater system, as detailed in the Infrastructure Report (refer to Industrial North – Appendix 13). The proposal also responds to existing and planned transport infrastructure, including the future Hamilton Southern Links corridor, and is not expected to create reverse sensitivity effects that would compromise its ongoing operation or development.
16.3.3.1 Avoid, remedy or mitigate the adverse effects of development or subdivision on the operation and maintenance of the transport network, including from: (a) Traffic generation, load type, or vehicle characteristics; and (b) The collection and disposal of stormwater; and (c) Reverse sensitivity effects where development or subdivision adjoins existing and planned roads.	
Policy Location of network utilities	Network utilities required to service Industrial North will be coordinated with the design and construction of the proposed transport network. Where new or upgraded utilities are located within road reserves, they will be designed and installed to avoid or minimise conflicts with the operation, maintenance and future development of the transport network. Utility infrastructure will also be coordinated with proposed footpaths, shared paths, street lighting and landscaping to ensure these features are not compromised. The
16.3.3.2 When significant alterations to existing utilities occur in the road reserve, or new network utilities locate in the road reserve, the network utilities must avoid, remedy, or mitigate impacts on: (a) The operation, renewal and development of the transport network; and (b) Existing and planned landscaping, tree planting, footpaths, lighting, bus bays, indented car parks, and any other amenity enhancements.	

	coordinated infrastructure approach is detailed in the Infrastructure Report (refer to Industrial North – Appendix 13).
Objective - Provision of vehicle entrances, parking, loading and manoeuvring areas	
Objective 16.3.4 The provision of adequate and well located vehicle entrances and parking, loading and manoeuvring areas that contribute to both the efficient functioning of the site and the adjacent transport network.	The Industrial North development has been designed to provide safe and efficient vehicle access, parking, loading and manoeuvring appropriate to the proposed industrial activities. The proposed industrial lots are of sufficient size and configuration to accommodate vehicle access and on-site parking, loading and manoeuvring, including for heavy vehicles, without adversely affecting the operation of the surrounding transport network. The Integrated Transport Assessment (refer to Industrial North – Appendix 16) confirms that the proposed access arrangements and transport network can appropriately accommodate the anticipated vehicle and freight movements associated with the development.
Policy Location of vehicle entrances	Vehicle entrances within Industrial North will be designed and located to provide safe sight distances and appropriate entry and egress for the anticipated vehicle types, including heavy vehicles associated with industrial activities.
16.3.4.1 To maintain the safe and efficient functioning of adjoining roads and railways, vehicle entrances to all activities shall be located and formed to achieve safe sight lines and entry and egress from the site. In some locations, adjoining rail lines, State Highways, and the District’s Commercial Zones; vehicle entrances will be limited and will require assessment due to the complexity of the roading environment, or the importance of provision for pedestrians.	The proposed access arrangements have been considered as part of the wider transport network design to ensure they do not compromise the safe and efficient operation of adjoining roads. The Integrated Transport Assessment (refer to Industrial North – Appendix 16) confirms that appropriate access can be provided to the proposed industrial lots.
Policies Ensuring adequate parking, loading and manoeuvring areas on-site	

16.3.4.2 To maintain the efficient functioning of adjoining roads, all activities shall provide sufficient area on-site to accommodate the parking, loading and manoeuvring area requirements of the activity, except in the Residential Zone and Medium Density Residential Zone where the provision of on-site manoeuvring for dwellings is enabled within the setbacks.	The proposed industrial lots are of sufficient size and configuration to accommodate the parking, loading and manoeuvring requirements of future industrial activities on-site, including heavy vehicle movements, thereby maintaining the safe and efficient operation of adjoining roads.
16.3.4.3 Activities that operate at different times and have adjoining sites may be able to share the use of the same parking spaces.	Where appropriate, future activities may also utilise shared parking arrangements or travel demand management measures to reduce parking demand and encourage alternative modes of transport. The proposed walking and cycling network support these alternative transport opportunities.
16.3.4.4 Certain activities may be able to demonstrate through the provision of a travel plan, that staff or occupants of the activity can access the activity through alternative means of travel, thus reducing the necessity for car parks. Advice Note: Appendix T1 of this Plan outlines the loading space requirements for activities.	Overall, the proposal provides sufficient flexibility to appropriately manage parking, loading and manoeuvring requirements
Policy On-site vehicle manoeuvring areas in the Residential Zone and Medium Density Residential Zone	
16.3.4.5 The requirement for dwellings to provide an on-site manoeuvring area may be dispensed with in specific and limited circumstances, where any adverse effects on safety can be avoided, remedied or mitigated.	N/A
Policy Encouraging the adaptive re-use of heritage items	
16.3.4.6 To achieve the adaptive re-use of heritage items, as listed in Appendix N1, a reduction in the requirement for vehicle entrances, and on-site loading space and manoeuvring areas can be considered where these cannot practicably be incorporated on-site due to the location of the heritage item on the site and the size of the site.	N/A

<i>Objective - Minimising adverse effects of the transport network</i>	
Objective 16.3.5 The transport network can have effects on the adjacent environment that must be mitigated through design.	The proposed transport network has been integrated with the Industrial North masterplan to appropriately manage effects on the surrounding environment. Road design, earthworks, stormwater management and landscaping have been coordinated to avoid, remedy or mitigate potential effects on adjoining land. Construction effects associated with the transport network, including earthworks, sediment, dust, noise and vibration, will be managed through the Construction Management Plan, Earthworks Management Plan (refer to Industrial North – Appendix 31) and Construction Noise and Vibration Management Plan (refer to Industrial North – Appendix 27). These plans provide specific controls for erosion and sediment management, construction activities, noise and vibration, monitoring and adaptive management. Stormwater generated from roads will be collected, treated and managed through the proposed stormwater system, including the new stormwater wetlands. Ecological effects will also be managed through the Fish Management Plan, Bat Management Plan, Bird Management Plan and Lizard Management Plan, where relevant. Industrial North does not propose noise-sensitive activities adjacent to strategic roads or railway lines. Accordingly, Policy 16.3.5.2 is of limited direct relevance. Overall, the proposed transport network and associated management plans provide appropriate measures to manage effects on the adjacent environment, and the proposal is considered consistent with Objective 16.3.5 and Policies 16.3.5.1–16.3.5.2.
Policy Natural environment	
16.3.5.1 Transport infrastructure, including its layout within a development and subdivision, shall be designed and located to avoid, remedy or mitigate adverse effects on the adjacent environment, having regard to stormwater collection, treatment and disposal, earthworks, noise and the landscape areas identified within this Plan and on the Planning Maps.	
Policy Noise and vibration	
16.3.5.2 Noise sensitive activities, adjacent to strategic roads, including State Highways, collector roads in the Rural Zone and Large Lot Residential Zones, and railway lines; will require acoustic attenuation to ensure the continuation of the ability to achieve acoustic privacy.	
Section 18.3 - Financial Contributions	
<i>Objective - Planned, financed growth</i>	
Objective 18.3.1	

To ensure that the adverse environmental effects on the District's network infrastructure are addressed in order to cater for the additional demand generated by new development or subdivision.	A private development agreement is being progressed and is expected to cover any relevant financial or development contribution (but not both) as part of this process.
Policy Early recognition of costs	
18.3.1.1 The adverse environmental effects of development or subdivision that can be addressed by requiring a financial contribution, shall be clearly identified at the planning and consenting stage of the development or subdivision.	
Policy Planned growth	Given the proposed growth is outside planned growth within Waipa, a private development agreement is being progressed and is expected to cover any relevant financial or development contribution (but not both) as part of this process.
18.3.1.2 To ensure that planned growth is adequately financed by taking financial contributions up to 10 years in advance of Council undertaking infrastructure works for Council provided infrastructure.	
Policy Recovering historical costs	
18.3.1.3 In circumstances where Council has already undertaken capital expenditure on its infrastructure networks, the capacity of those infrastructure networks which is consumed by a proposed development or subdivision shall be recovered by taking financial contributions.	
Objective - Equitable sharing of costs	
Objective 18.3.2 To ensure that there is a fair and reasonable share of the costs of upgrading or providing new infrastructure to meet demands generated by the development or subdivision, and to enable future growth.	Given the proposed growth is outside planned growth within Waipa, a private development agreement is being progressed and is expected to cover any relevant financial or development contribution (but not both) as part of this process.
Policy Costs to developers	

18.3.2.1 Requiring payment of the total cost of new and off-site infrastructure associated with the development or subdivision; including linkages, where the additional infrastructure is required solely to serve the proposed development or subdivision.	
Policy Contribution to consumption of installed infrastructure capacity	
18.3.2.2 Requiring a contribution towards any previous upgrading of off-site infrastructure when a new development or subdivision will utilise installed infrastructure capacity.	
Policy Costs relating to effects	
18.3.2.3 Ensuring that the amount of financial contribution required reasonably reflects the cost of avoiding, remedying or mitigating the adverse effects.	
Objective - Heavy vehicle impact fee	
Objective 18.3.3 To ensure the community is adequately protected from any unpredictable adverse effects of heavy vehicles on the District's road network due to land use activities.	
Policy To make provision for a heavy vehicle impact fee	The proposed industrial development will generate additional heavy vehicle movements on the surrounding road network. These effects have been assessed in the Integrated Transport Assessment (refer to Industrial North – Appendix 16), with transport improvements identified to ensure the additional traffic generated by Industrial North can be safely and efficiently accommodated.
18.3.3.1 A heavy vehicle impact fee will be required where a development creates adverse effects on the District's road network which: (a) Requires the construction or upgrading of any routes or other infrastructure for vehicles and pedestrians off the site; and/or	The proposal includes upgrades to key intersections and the surrounding transport network, with the timing of these improvements coordinated with the staged development of Industrial North. This will ensure that transport effects associated with industrial and heavy vehicle movements are appropriately managed.

(b) Generates increases in heavy traffic which are likely to lead to infrastructure renewal being required earlier than planned in Council's Long Term Plan.	Where the development generates effects on the District's road network that meet the criteria in Policy 18.3.3.1, any applicable heavy vehicle impact fee can be addressed through the consent and development process.
Section 19.3 - Hazardous Substances and Contaminated Land	
<i>Objective - Hazardous substances and facilities: prevention or mitigation of adverse environmental and human health effects and minimisation of risk</i>	
Objective 19.3.1 To avoid or mitigate the risks of adverse effects created by the transport, use, storage and disposal of hazardous substances and/or the management of hazardous facilities on the environment.	The proposal is for subdivision and development of Industrial North and does not seek approval for specific hazardous facilities or the storage, use or disposal of hazardous substances associated with future industrial occupiers.
Policy Management of adverse effects of hazardous facilities	Any future industrial activity involving hazardous substances will be required to comply with the relevant regulatory requirements and ensure that hazardous facilities are appropriately designed, located and operated to minimise risks to human health and the environment. This will include consideration of surrounding land uses, sensitive receiving environments and identified natural hazards. Existing contamination within the site has separately been identified and assessed through the Detailed Site Investigation (refer to Industrial North – Appendix 21), with remediation and management measures set out in the Contaminated Soils Remedial Action Plan (refer to Industrial North – Appendix 22).
19.3.1.1 To ensure that hazardous facilities are designed, located, constructed and operated to avoid or mitigate adverse effects, including minimising risks to human health and the environment.	
Policy Location of hazardous facilities	
19.3.1.2 To ensure that the establishment of hazardous facilities are prevented where the risks created by the facilities cannot be adequately avoided or mitigated, when having regard to: (a) Surrounding land use activities; and (b) The sensitivity of the surrounding natural environment; and (c) Potential future use of adjacent land areas where these areas have been identified by Council as suitable for growth; and (d) The potential for sensitive land uses anticipated by the zone; and	

(e) The cumulative effects of activities involving the use of hazardous substances; and (f) The potential for effects from hazards such as flooding or unstable ground. Advice Note: Please also refer to the objectives and policies of the zone, in particular consistency of the proposal with the objectives and policies of the zone in which it is locating.	
Policy Transport and disposal of hazardous substances and waste	
19.3.1.3 To ensure that hazardous substances and hazardous waste are transported and disposed of using methods and facilities which: (a) Are specifically designed to handle the disposal of hazardous substances; and (b) Use techniques that avoid adverse effects on human health and the environment.	
Policy Risk management for hazardous facilities	
19.3.1.4 To ensure that all hazardous facilities have emergency contingency plans and/or strategies capable of avoiding, remedying or mitigating adverse environmental or human health effects upon failure of a facility, primary storage device, or accidental spill or release during handling or transfer.	
<i>Objective - Managing risks of potentially contaminated land</i>	
Objective 19.3.2 To ensure that significant risks to human health and the environment posed by potentially contaminated land are identified and addressed as part of development, or change of use.	A Preliminary Site Investigation and Detailed Site Investigation (refer to Industrial North – Appendix 21) have been undertaken for the Industrial North site by a Suitably Qualified and Experienced Practitioner (SQEP). The investigations identified localised soil contamination associated with historical activities, including asbestos-containing
Policy	

Investigation of potentially contaminated land	material within historic fill, hydrocarbon contamination associated with the existing storage yard and an isolated elevated zinc concentration.
19.3.2.1 To ensure that development sites that have a history of land use that may have resulted in contamination of the soil shall be subject to a preliminary site investigation to confirm whether further investigation, remediation or management is required. This will ensure that the land is suitable for the intended exposure to humans and the environment. Advice Note: For the effects on human health the requirements of the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 must be followed.	The investigations identify the measures required to appropriately manage contaminated soils during earthworks and development. Remediation and management will be undertaken in accordance with the Contaminated Soils Remedial Action Plan (refer to Industrial North – Appendix 22) to ensure potential risks to human health and the environment are appropriately managed. Overall, potential contamination has been appropriately investigated and a clear framework established for its remediation and management.
Objective - Managing risks of contaminated land	
Objective 19.3.3 To ensure that unacceptable risk to human health and the environment posed by remediation, development, use and redevelopment of contaminated land is prevented or mitigated.	The Detailed Site Investigation (Industrial North – Appendix 21) identifies localised areas of soil contamination within Industrial North, including asbestos-containing material within historic fill, hydrocarbon contamination associated with the existing storage yard and an isolated elevated zinc concentration.
Policy Avoid or mitigate of adverse effects of contaminated land	Potential risks to human health and the environment associated with disturbance and future use of contaminated land will be managed through the Contaminated Soils Remedial Action Plan (Industrial North – Appendix 22). This provides procedures for the remediation, excavation, handling, validation, reuse or disposal of contaminated soils to ensure the land is suitable for its intended industrial use.
19.3.3.1 By ensuring that all development, use, and redevelopment of land affected by soil contamination avoids, remedies or mitigates adverse effects and risk on human health.	
Policy Management measures for contaminated land	Overall, the proposed remediation and management measures will appropriately avoid or mitigate risks to human health and the environment associated with contaminated land.
19.3.3.2 By ensuring that management measures for contaminated land, that provide for remediation, management, or disposal of contaminated soil, ensure that the level of contamination is appropriate for any proposed future use of the land. Policy	

Risk management for use of contaminated land	
19.3.3.3 By ensuring that exposure from the on-going use of land affected by soil contaminants is managed in a way that prevents or mitigates any adverse effects on human health. Advice Note: For the effects on human health the requirements of the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 must be followed.	
Section 20.3 - Health and General Amenity	
<i>Objective - Air and water quality</i>	
Objective 20.3.1 To maintain and where possible improve existing air and water quality.	The proposal is considered consistent with Objective 20.3.1 and Policy 20.3.1.1, as potential adverse effects on air and water quality and the surrounding environment will be managed through an integrated suite of design measures, management plans and operational controls.
Policy Contain adverse effects	
20.3.1.1 To ensure that activities avoid, remedy or mitigate nuisance effects beyond the boundary of the site and on any water bodies in order to maintain and enhance amenity and a healthy and safe environment.	
Policy Reduce carbon dioxide discharges	
20.3.1.2 Encourage the reduction of discharges, particularly of carbon dioxide, to air from vehicle emissions and heating sources through encouraging development and subdivision to address strategic settlement pattern, urban design and integrated transport objectives, policies and rules.	

	minimise reverse-sensitivity effects. Controls relating to outdoor storage, loading and servicing areas, screening and frontage treatment will further assist in containing effects generated by industrial activities within the Site. The proposal also provides a comprehensive response to stormwater and water quality. Runoff will be managed through an integrated treatment train incorporating source controls, retention or soakage where appropriate, swales, forebays and constructed treatment wetlands before controlled discharge to the Waitawhiriwhiri catchment. This represents a substantial improvement in the treatment and attenuation of runoff relative to the existing modified pastoral and industrial environment. The Hydrogeological Assessment also concludes that groundwater effects will be temporary and localised during construction and minor during operation, with no material long-term reduction in groundwater resources anticipated. More broadly, the strategic location of Industrial North immediately adjoining an established industrial area supports a consolidated urban form, while the provision of walking and cycling connections will improve transport choice and connectivity with the surrounding network. Overall, potential effects generated by the development can be appropriately contained, treated and managed, while the permanent stormwater system is expected to improve the treatment of runoff relative to the existing environment. The proposal is therefore considered consistent with Objective 20.3.1 and Policy 20.3.1.1.
Objective - Artificial lighting and reflected glare	
Objective 20.3.2 To avoid, remedy or mitigate adverse effects from artificial lighting and reflected glare from buildings or building materials.	The proposal is considered consistent with Objective 20.3.2 and Policy 20.3.2.1, as future external lighting will be designed and managed to provide the illumination necessary for safe vehicle, pedestrian and operational activities while avoiding or
Policy Artificial lighting	

20.3.2.1 To ensure that artificial lighting is installed and utilised so as to avoid, remedy or mitigate adverse effects on adjoining and adjacent properties and roads.	minimising adverse effects from light spill and glare on adjoining activities and ecological values.
Policy Glare from buildings	Lighting has been considered through both the urban design and ecological response. External lighting associated with industrial buildings, roads, yards, parking and servicing areas will be appropriately located, oriented and designed to minimise unnecessary illumination beyond the areas requiring lighting. The proposed Core Controls, together with landscape buffers and the orientation and layout of industrial sites, will provide additional management of lighting at public and rural interfaces and assist in limiting effects on surrounding properties.
20.3.2.2 To minimise reflective glare from buildings.	Particular consideration has been given to potential effects on long-tailed bats, which are known to use the wider landscape. The Bat Management Plan incorporates specific bat-sensitive lighting requirements, including downward directed and appropriately baffled fittings, warm-colour LEDs, low mounting heights where practicable and time-limited security lighting. A maximum illuminance of 0.3 lux at relevant external Site boundaries will further limit light spill into adjoining areas and potential bat habitat. Together, these measures provide an integrated framework for ensuring that external lighting remains functional and appropriate for an industrial environment while minimising unnecessary light spill, glare and effects on adjoining land uses and ecological values. The proposal is therefore considered consistent with Objective 20.3.2 and Policy 20.3.2.1.
Objective - Maintenance of buildings, sites and infrastructure	
Objective 20.3.3 To ensure that buildings, sites and infrastructure are maintained.	The Industrial North development will provide new buildings, infrastructure, roads and landscaped areas that will be maintained to ensure they continue to function effectively and contribute positively to the amenity of the industrial environment.
Policy Maintaining amenity values	
20.3.3.1	

To ensure that buildings, sites and infrastructure are maintained and do not detract from amenity values or result in any adverse effects on roads.	The proposed landscaping and streetscape treatment will assist in maintaining a high-quality industrial environment, while infrastructure will be designed and maintained to avoid adverse effects on the surrounding road network.
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Volume 1: Part F – District Wide Natural and Cultural Heritage

Section 22.3 - Heritage and Archaeology

Objective - Protection of heritage items

Objective 22.3.1 To protect the District’s heritage items from inappropriate subdivision, use and development.	There are no listed heritage items identified within the Industrial North development site that would be directly affected by the proposed subdivision and development.
Policy Providing protection for listed heritage items	The Archaeological Assessment (refer to Industrial North – Appendix 25) has also assessed the archaeological and historic heritage values of the site and identifies no recorded archaeological sites within the application area. Appropriate accidental discovery procedures are proposed to manage any previously unidentified archaeological material encountered during construction.
22.3.1.1 To protect the heritage values associated with heritage items, (Appendix N1) so that the national, regional or local significance of the item is retained. The basis of the significance of an item is wide ranging and can be its built features or the role that an item has played in the community over time. The categories that apply are: (a) Category A: National Significance - Heritage items of national significance that are classed as Category I Historic Places under the Heritage New Zealand Pouhere Taonga Act 2014. (b) Category B: Regional and District wide Significance - Significant regional heritage items are items which have importance to the history of the region or district or have a high level of built integrity and are a good example of a type of building, and includes buildings or structures classed as Category II Historic Places under the Heritage New Zealand Pouhere Taonga Act 2014. Buildings considered to be of particular importance are denoted as B+. This also includes the Karāpiro Hydro Electric Village Heritage Item. This is a precinct that provides a significant and unique representative group of twenty-one English revival cottages and six	The proposal will therefore not result in the modification, removal or loss of any identified heritage item. Overall, the proposal appropriately recognises and provides for heritage and archaeological values and is considered consistent with Objective 22.3.1 and Policy 22.3.1.1.

former community buildings that were associated with the construction and operation of Karāpiro Hydroelectric Power Station. The precinct is inclusive of the reserve and a portion of Ariki Street. (c) Category C: Community Significance - Local significance heritage items are of local importance, contribute to the community's history and are noteworthy as community heritage places. (d) Groups of heritage buildings: To protect the heritage value/s associated with groups of heritage buildings by maintaining the integrity, special character, and features of the group, including the social and historic significance of the group as a whole. Advice Note: If any of the items are listed with a 'G' beside it, this denotes the building is part of a 'group' of listed historic buildings. Groups of heritage buildings include groups of commercial buildings in town centres or groups of buildings on homesteads such as a house, barn and sheds.	
Section 24.3 - Indigenous Biodiversity	
<i>Objective - Managing effects on district wide indigenous biodiversity</i>	
Objective 24.3.1 To maintain and enhance the existing level of biodiversity within the District.	The proposal is considered consistent with Objective 24.3.1. Industrial North is a highly modified environment with limited indigenous vegetation, but the EclA (refer to Industrial North – Appendix 23) identifies indigenous fauna values associated with bats, birds, potential lizard habitat and freshwater fish. Long-tailed bats have very high species value because of their Threatened - Nationally Critical status, although recorded use of the Site is low and on-site bat habitat is assessed as low to moderate. Effects will be managed through dedicated Bat, Bird, Lizard and Fish Management Plans, including nesting controls, lizard salvage and relocation, DOC compliant bat roost protocols, bat-sensitive lighting and fish salvage before drain reclamation. The proposal also establishes indigenous and riparian planting and three planted stormwater wetlands, increasing habitat and ecological connectivity relative to the existing modified environment. The EclA concludes that post-management effects will be very low to low with no significant residual effects.

Policy Maintenance and enhancement of indigenous biodiversity 24.3.1.1 To achieve the maintenance and enhancement of indigenous biodiversity values in the District by ensuring that removal of indigenous vegetation or disturbance of wetland areas only occurs where: (a) Connectivity to link core habitats along biodiversity corridors is supported; and (b) Sensitive sites remain buffered from intensive land use, development and subdivision; and (c) Habitat is retained for at risk and threatened indigenous species; and (d) Customary activities do not adversely affect at risk or threatened indigenous species; and (e) Consideration has been given to opportunities that contribute to no net loss at a regional scale.	The Industrial North site is highly modified; however, it contains ecological values associated with freshwater habitats and indigenous fauna, including long-tailed bats, indigenous birds, lizards and freshwater fish. These values have informed the design and ecological management response for the development. Potential effects will be managed through the EclA (refer to Industrial North – Appendix 23) and Ecological Management Plans (refer to Industrial North – Appendix 23), including species specific measures to protect and manage habitat for indigenous fauna. The proposal will also provide ecological enhancement through indigenous and riparian planting, habitat creation and the establishment and planting of new stormwater wetlands, contributing to improved habitat connectivity and biodiversity values across the site. Overall, the proposal provides for the maintenance and enhancement of indigenous biodiversity and opportunities to contribute to no net loss.
Policy Indigenous vegetation removal for tracks 24.3.1.2 To ensure that the effects of indigenous vegetation removal for the creation of new tracks is remedied or mitigated in accordance with the identified indigenous biodiversity values of the area.	The Industrial North site contains limited indigenous vegetation and the proposal does not involve the creation of tracks requiring significant indigenous vegetation removal. Where any indigenous vegetation removal is required in association with access or transport infrastructure, potential effects on identified biodiversity values will be managed through the EclA and Ecological Management Plans (refer to Industrial North – Appendix 23), including appropriate remediation and mitigation measures. Accordingly, Policy 24.3.1.2 is of limited direct relevance, and any vegetation removal associated with the development will be appropriately managed consistent with the intent of the policy.

Policy Te Awa cycleway	N/A
24.3.1.3 To provide for the removal of indigenous vegetation for the construction of the Te Awa cycleway where the indigenous biodiversity values and connectivity are appropriately avoided, remedied or mitigated.	
Policy Sustainable harvesting of indigenous vegetation	N/A
24.3.1.4 To provide for sustainable harvesting of indigenous vegetation where the indigenous biodiversity values and ecological characteristics of the area are maintained or enhanced.	
Policy Conservation activities	N/A
24.3.1.5 Conservation activities that require minor disturbance or removal of indigenous vegetation are enabled.	
Policy Removal of manuka or kanuka	N/A
24.3.1.6 To provide for the removal of small amounts of manuka or kanuka on a sustainable basis.	
Policy Electricity transmission and distribution	N/A
24.3.1.7 To provide for appropriate management of indigenous vegetation in accordance with the National Environmental Standard for Electricity Transmission.	

Policies Non-regulatory methods	
24.3.1.8 To encourage planting of indigenous vegetation to enhance indigenous biodiversity values.	The proposal incorporates a range of measures that will enhance indigenous biodiversity within the Industrial North site, including indigenous and riparian planting, habitat creation and the establishment and planting of new stormwater wetlands.
24.3.1.9 To ensure stock and pests are appropriately managed.	These measures will increase indigenous vegetation, improve habitat connectivity and provide additional habitat for indigenous fauna within the currently highly modified environment. Ongoing ecological management, including pest management where required, will be addressed through the Ecological Management Plans (refer to
24.3.1.10 To promote enhancement of indigenous biodiversity in the District through a range of both regulatory and non-regulatory methods. Advice Note: Please refer to Environmental Benefit Lot Rules 15.4.2.50 to 15.4.2.55.	Industrial North – Appendix 23).
Section 26.3 - Lakes and Water bodies	
<i>Objective - Protecting the natural character of lakes and water bodies and their margins, from inappropriate use, and development</i>	
26.3.1 Ensure that activities that occur on and adjacent to lakes and water bodies are managed to avoid, and where possible enhance, natural character and water quality.	The proposal is considered consistent with Objective 26.3.1. The freshwater environment within the Industrial North site is highly modified and does not contain any natural lakes or natural inland wetlands. Freshwater features within the Site principally comprise straight artificial farm drains and existing artificial ponds that connect to the wider downstream receiving environment. While parts of this artificial drainage network will be reclaimed or diverted to enable development, the proposal has been designed to maintain drainage function and appropriately manage effects on water quality, freshwater ecology and natural character. As detailed in the Infrastructure Report (Industrial North – Appendix 13) and Stormwater Management Plan (Industrial North – Appendix 14), hydraulic connectivity through the Site will be maintained through retained drainage corridors, diversion channels, culverts, swales and overland flow paths. The permanent stormwater system will incorporate source controls, treatment, extended detention and attenuation through constructed stormwater wetlands before controlled

	discharge to the downstream receiving environment. This integrated approach will manage both water quality and flood risk associated with the transition to industrial development. Freshwater ecological effects have also been specifically considered through the EclA (refer to Industrial North – Appendix 23). Fish salvage and relocation will be undertaken before affected drains are reclaimed or diverted, while the establishment of three vegetated stormwater wetlands and associated indigenous and riparian planting will provide additional aquatic and riparian habitat within the presently modified environment. These measures will increase indigenous vegetation, improve ecological connectivity and provide opportunities to enhance freshwater habitat and water-quality outcomes relative to the existing environment. Overall, while the proposal will modify parts of the existing artificial drainage network, it will maintain hydraulic connectivity, appropriately manage effects on downstream water quality and freshwater ecology, and establish new vegetated wetland and riparian habitat. In the context of the highly modified existing freshwater environment, the proposal appropriately manages the natural character and ecological values of water bodies relevant to Objective 26.3.1.
Policy Ensuring activities are setback from lakes and water bodies	The layout of Industrial North has considered the existing drainage network and associated freshwater values. Appropriate setbacks and riparian planting will be provided where required to maintain separation between development and water bodies and to protect water quality and ecological values. The proposed stormwater management system, including new stormwater wetlands and associated riparian planting, will further assist in managing effects on water quality and enhancing freshwater habitat, as detailed in the Stormwater Management Plan (Appendix 3I) and EclA (Appendix 3S).
26.3.1.1 To ensure that adverse effects on public access to lakes and water bodies, and on the natural character and quality of the water in lakes and water bodies are avoided, through establishing setbacks for a range of activities that may cause adverse effects, except within the Karāpiro and Arapuni Hydro Power Zone.	
Policy	

Managing effects	
26.3.1.2 Buildings, paved areas and wastewater treatment systems shall be located to avoid, remedy or mitigate adverse effects on remnant areas of indigenous flora and fauna, including, significant natural areas, peat lakes, and wetlands.	Potential effects on the Site's artificial watercourses and the downstream receiving environment are managed through the integrated stormwater and ecological response. Runoff will be treated and attenuated before discharge, external catchment flows will be maintained through the Site, and the 100 year climate change event will be attenuated to no more than 80% of pre-development discharge. Fish salvage and relocation will precede drain reclamation or diversion, and construction sediment controls will protect downstream habitat and water quality. These measures appropriately manage effects on waterbody values and are consistent with Policy 26.3.1.2.
Policy Customary activities	
26.3.1.3 To enable customary activities to be undertaken within and adjacent to the lakes and water bodies of the District	Extensive consultation with Tangata Whenua has been undertaken as part of the preparation of the Southern Links 1 substantive application, as further detailed in the Engagement and Consultation Report included at Industrial North Planning Attachment 2 . A Cultural Impact Assessment and letters of support have been provided by Ngaati Wairere, Ngaati Maahanga, Ngaati Tamainupoo, Ngaati Hauaa, Ngaati Koroki-Kahukura and Ngaati Apakura (refer to Industrial North – Appendix 24). Opportunities for customary activities are intertwined into the riparian planting and ecological outputs onsite. This supports both environmental outcomes and cultural wellbeing.
Policy Managing ecological effects	
26.3.1.4 To ensure that users undertaking activities on the surface of lakes and water bodies and within their margins do not adversely affect water quality, or significant natural areas, other indigenous vegetation, or habitats of significant indigenous fauna.	The EclA (refer to Industrial North – Appendix 23) identifies the artificial drains as having negligible to low ecological value. The existing drainage network and associated freshwater habitats within Industrial North have been considered as part of the design and ecological assessment of the development. Potential effects on water quality, indigenous vegetation and habitats of indigenous freshwater fauna will be managed through the proposed stormwater treatment

	system and the measures identified in the EclA and Ecological Management Plans (refer to Industrial North – Appendix 23). Riparian planting and new stormwater wetlands will also provide opportunities to enhance freshwater habitat and ecological values. The development has recognised the mana of tangata whenua as kaitiaki, including of indigenous biodiversity, as further set out in the Consultation Report (refer to Industrial North Planning Attachment 2) and the Cultural Impact Assessment at Industrial North – Appendix 24. Any potential impacts on indigenous fish which may reside within the existing farm drains will be managed in accordance with the proposed Fish Management Plan. The SL1 Residential South development has recognised the mana of tangata whenua as kaitiaki, including of indigenous biodiversity, as further set out in the Consultation Report at and the Cultural Impact Assessment.
Policy Recreational activities	The Industrial North development does not propose recreational activities adjoining lakes or water bodies. Accordingly, Policy 26.3.1.5 is of limited direct relevance to the proposal.
26.3.1.5 To enable recreation activities adjoining lakes and water bodies, and ensure that they do not have adverse effects on the health and well-being of lakes and water bodies.	Notwithstanding this, the proposed walking and cycling network and landscaped stormwater areas will provide amenity benefits within the development, while the stormwater and ecological management measures will ensure these activities do not adversely affect freshwater values.
Policy Enhancing natural character	The proposal is considered consistent with the enhancement intent of Policy 26.3.1.6. The existing freshwater environment within Industrial North is highly modified, comprising principally artificial farm drains with limited and fragmented natural character. While development will alter and, in places, reclaim or divert these existing
26.3.1.6 Promote the restoration and enhancement of the natural character of lakes, water bodies and their margins.	

	drainage features, it also provides an opportunity to establish a more coherent and ecologically functional blue-green network across the Site. As detailed in the Stormwater Management Plan (Industrial North – Appendix 14) and EcIA (Industrial North – Appendix 23), the proposal will establish constructed stormwater wetlands, swales, planted margins and indigenous and riparian vegetation associated with the drainage network. These features will provide stormwater treatment and attenuation functions while also increasing the extent and visibility of water and vegetation within the future industrial environment, providing additional aquatic and riparian habitat and improving ecological connectivity across the Site. The Landscape and Visual Assessment (Industrial North – Appendix 12) similarly recognises that existing natural character is limited and fragmented. Although the proposed stormwater system will necessarily have an engineered component, the integrated wetland, swale and planting network will establish a more legible and coherent expression of water and vegetation within the completed development. This will provide a defined landscape structure through the industrial precinct and improve the ecological and landscape qualities of waterbody margins relative to the existing modified drainage environment. Overall, the proposal will replace a fragmented artificial drainage environment with a deliberately designed blue-green stormwater and landscape network that combines functional stormwater management with indigenous planting, habitat creation and ecological connectivity. In this context, the proposal provides meaningful opportunities to restore and enhance the natural character and ecological values of water bodies and their margins and is therefore considered consistent with Policy 26.3.1.6.
Policy Good practice: lakes, water bodies and wetlands	

26.3.1.7 To promote good land use practice adjoining lakes, water bodies and wetlands; including promoting the value of wetlands for both their biodiversity importance and the ecological services they provide (e.g. controlling sediment and nutrients runoff from intensively managed land)	During construction with the implementation of construction management plans, erosion and soil controls, earthwork management plans and the like, the development will ensure there is a net positive outcome for ecology in the long term. The philosophy for stormwater will further improve water quality within waterbodies and support ecological enhancement.
Policy Good practice: peat lakes	N/A.
26.3.1.8 Promote good land use practice adjoining peat lakes including promoting less intensive land uses, maintaining and enhancing peat lake surrounds, and promoting the re-routing of drains into peat lakes.	
<i>Objective - Managing conflict on the surface of the water</i>	
26.3.2 To avoid, remedy, or mitigate conflict between users of the surface of the water.	No conflict is anticipated with the implementation of best practice conditions and management plans to manage any erosion and sediment control.
Policy Public safety	N/A.
26.3.2.1 All activities on lakes and water bodies must maintain and enhance public safety.	
Policy Managing adverse noise effects	N/A.
26.3.2.2 Minimise adverse noise effects on adjoining land uses from motorised activities undertaken on the surface of the water and the margins of lakes and rivers.	
Policy	

Effects on lake levels	N/A.
26.3.2.3 All activities on lakes and water bodies and their margins must recognise and provide for fluctuating water levels as determined by Waikato Regional Council as a result of hydro electricity generation and operating easements on Lake Karāpiro and Lake Arapuni.	