

**Appendix D – Development Framework & Development
Framework Justification**





Development Framework

Te Kowhai East Industrial Development

Unless otherwise specified in this Development Framework, the district-wide rules of the Hamilton City Council Operative District Plan (HCC ODP) apply to the Te Kowhai East (TKE) area as if the land were zoned Industrial under the HCC ODP. The below activities apply to the TKE area.

ACTIVITIES TABLE¹

Location	Activities
All sites outside of the identified Neighbourhood Centre land	• Industrial activity • Ancillary retail and offices • Public transport facilities • Parking lots and parking buildings • Emergency service facilities • Battery storage facilities • Data centres • One ancillary residential unit per site and per principal industrial activity of < 70 m² Gross Floor Area (GFA) • Food and beverage outlets • Boarding kennels and catteries
Within non-industrial land use precinct ²	All the activities listed above and: • Places of worship • Gymnasium • A childcare facility • Wholesale membership retail • Wholesale retail trade and supplier • Yard-based retail • Outdoor golf driving range
Within the Neighbourhood Centre	• Retail < 200 m² GFA • A supermarket < 1000 m²

¹ For clarify, the activity rules in Section 9.3 of the HCC ODP do not apply

² The non-industrial land use precinct is defined in Figure 12 – Land Use Concept of the Adapt Studio Folio of Masterplan Figures



	• Restaurants, cafes and licensed premises < 500 m² GFA • Gymnasium < 500 m² GFA • Public transport facility • Health facility at ground level < 500 m² GFA • Health facility above ground level • A childcare facility • Community centres < 500 m² GFA • Places of worship • Tertiary education and specialised training facilities of < 250 m² GFA at ground floor level • Tertiary education and specialised training facilities above ground floor level • Residential unit (above ground floor) • Offices above ground level < 2000 m² total GFA with maximum size of 300 m² per office
Not provided for within the site by this development framework	• Any activity required an air discharge consent under the Waikato Regional Plan within 100m of residential activities. • Any noxious or offensive activity • Motor vehicle dismantling • Recycling plants including the associated storage and metals, plastics, glass, electronic components or batteries prior to processing • Processes involving the flaring or incineration of trade wastes or refuse. • The manufacture or blending of bulk fertiliser, animal feed, roading materials, gardening materials, concrete and aggregate.



INDUSTRIAL SITE PERFORMANCE STANDARDS

The development standards in the table below apply to the TKE Site outside of the identified Neighbourhood Centre.

Standards	Controls
Site coverage	75% of net site area
Building setbacks	Collector and arterial road = 5 m Local road = 3 m Adjoining rural zoned properties = 15 m Other boundaries = 0 m 40 m from the Waikato Expressway for noise-sensitive activities and 15 m from the designation boundary for other activities.
Building height	20 m
Height in relation to boundary	No part of a building shall penetrate a height control plane rising at an angle of 45° (or 28° on a southern boundary) beginning at 3 m above any boundary adjoining a vested reserve.
Permeable surfaces	0% where the site adjoins a vested reserve; otherwise minimum 10% of site area.
Site Landscaping (including landscape screening/buffer areas)	a) With the exception of areas required for driveway and vehicle crossing, land within 2m of local and collector roads is planted. b) This planting shall consist of a combination of groundcovers, shrubs and trees, with at least one tree planted for every 10m of road frontage at a grade of no less than PB35. c) For the avoidance of doubt, road frontages up to 10 m wide will require one tree at a grade no less than PB35. PB35 is equivalent to a tree that is 1.5 m to 2 m tall at the time of planting. d) Outdoor storage areas and/or any air conditioning unit visible from any road or other public place (including land that may be vested to Council) shall be screened by landscape planting of 2 m in height. e) Where appropriate, drainage management measures shall be integrated into the landscaping.
Site Layout	a) No plant or machinery (including air-conditioning units), goods, materials or waste shall be placed in front of the building or within any building setback. b) No parking, storage and loading space should be located within the required front setback. For corner sites, this only applies to the primary frontage. c) Visitor and staff parking areas should be located adjacent to areas of the building that are commonly accessed, and a pedestrian pathway should be provided to the entrance of the building. d) Outdoor staff areas should (where possible) be located to take advantage of northern aspect, connection to internal staff meals areas, and be landscaped with shade trees and seating. e) Fences and walls in the front yard setback from which vehicle access is obtained shall not exceed 1.2m in height. This provision excludes security fencing less than 2.5 m in height or cumulatively less than 2.5 m in height with a retaining wall. f) No storage, loading or unloading of containers shall take place forward of the front building line of any building fronting a transport corridor or State Highway boundary or land to be vested for recreational purposes.



ACTIVITY SPECIFIC STANDARDS

Standards	Controls
Ancillary retail and office	a) Ancillary retail and/or office activity shall not occupy, either individually or combined, more than 10% of the gross floor area or 250m², whichever is the lesser, and shall be ancillary to, and form an integral part of the principal activity on the site. b) Retail and/or office ancillary to industrial buildings shall be located at the front of the building and facing the road. On corner sites, they are only required to face the primary frontage.
Ancillary residential units	Ancillary residential units are enabled where the principal activity generates 250 or more vehicle movements per day, and provided they comply with the site performance standards. Ancillary residential units shall also be designed, insulated, constructed and maintained to ensure that: a) Noise received shall not exceed 35 dB LAeq (15min) in bedrooms and 40 dB LAeq (15min) to all other habitable rooms from noise not on the same site; and b) If windows are required to be closed to achieve the noise limits in clause (a) above, the building shall be designed and constructed to provide an alternative means of ventilation in accordance with Clause G4 of the New Zealand Building Code; and c) An acoustic design report prepared by an appropriately qualified practitioner confirming compliance with clause (a) and (b) above shall be submitted to Council as part of resource or building consent application.
Outdoor golf driving range up to 30,000m ² (excluding parking)	Outdoor golf driving range shall: a) Have natural grass surfaces b) Accommodate overland flow paths with no change where the overland flow path enters and exits the property boundary. c) Meet stormwater detention requirements onsite.
Food and Beverage Outlets	Up to 250m ² GFA per site.
Wholesale membership retail	One wholesale membership retail activity exceeding 1,500 m² GFA is provided for. For a wholesale membership retail activity exceeding 1,500 m² GFA, a building consent application needs to be accompanied by a Traffic Management Plan that: a) Demonstrates how traffic will be managed when entering and exiting the site onto the public road network. The purpose of the Traffic Management Plan is to manage queuing on the public road network and to avoid or mitigate effects on the safe and efficient operation of the road network; and b) Includes consideration of short-stay and long-stay active mode facilities and public transport measures. A site plan shall be provided that: a) Demonstrates that wayfinding measures are incorporated for all transport modes; and b) Parking, internal accessways and loading spaces comply with the applicable HCC ODP formation standards; and c) Service and loading areas are screened from public spaces.



Subdivision - minimum net site area and shape	The following standards apply to any subsequent subdivision, including variations or proposed changes to the approved subdivision: a) Minimum 1000 m² for front lots and 500m² for rear lots except where subdivision is undertaken to create separate titles for individual units within an established or consented development. b) Front lots must have a road frontage of at least 15m. c) Be connected to public-reticulated water supply and wastewater.
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NEIGHBOURHOOD CENTRE PERFORMANCE STANDARDS

Building setbacks	Collector road = 2 m Local road = 0 m Other boundaries = 0 m
Building height	18m
Service area	a) Any building shall provide service areas as follows: (i) At least one service area of not less than 10 m² or 1% of the gross floor area of the building, whichever is greater. (ii) Any additional service areas shall not: • Be less than 5 m² • Have a minimum dimension of less than 2.5 m (iii) Any outdoor service areas shall be maintained with an all-weather, dust-free surface. (iv) Any outdoor service area may be located within a building provided that it is separately partitioned with an exterior door directly accessible by service vehicles. (v) Any service area shall not encroach on to areas required by this District Plan for other purposes (e.g. parking, loading, landscaping and screening). (vi) Be located away from public view or otherwise screened by fencing and landscaping.
Outdoor storage	a) Any outdoor storage area used for the storage of goods or material shall: (i) Be laid out and used in a manner that does not conflict with vehicle access (ii) Be maintained with an all-weather, dust-free surface (iii) Be located away from public view or otherwise screened by fencing and landscaping (iv) Not encroach on areas required by this District Plan for other purposes (parking, loading, landscaping and screening).
Residential unit	a) Each residential unit shall be provided with an outdoor living area that is: (i) For the exclusive use of each residential unit; and (ii) Readily accessible from a living area inside the residential unit; (iii) Is 8m² in size, per residential unit, and has a dimension no less than 1.5m b) Each residential unit shall be provided with a storage area that is: (i) Located at or below ground-floor level, readily accessible to that residential unit, secure and weatherproof; and (ii) Provides a minimum storage volume of: • Studio Unit – 3m³



	• One bedroom unit - 4m³ • Two bedroom unit - 5m³ • Three or more-bedroom unit 6m³ c) The minimum dimensions for width and depth of the storage areas shall be 1.2m and provided storage areas should have a minimum height of 1.8m. d) Residential units are to be orientated parallel to a transport corridor or open space within the Neighbourhood Centre that is in common ownership (e.g. a pedestrianised mall). e) External outlook space shall be provided from habitable room windows as follows: (i) A principal living room of a dwelling must have an outlook space with a minimum dimension of 3m depth and 3m width. (ii) All other habitable rooms must have an outlook space of 1m in depth and 1m in width. (iii) The depth of the outlook space is measured at right angles to and horizontal from the window to which it applies. (iv) The width of the outlook space is measured from the centre point of the largest window on the building face to which it applies. (v) The height of the outlook space is the same as the floor height, measured from floor to ceiling, of the building face to which the standard applies. (vi) Outlook spaces may be over driveways and footpaths within the site or over a public street or other public open space. (vii) Outlook spaces required from different rooms within the same building may overlap, and may also overlap where they are on the same wall plane in the case of a multi-storey building. (viii) Outlook spaces may be under or over a balcony. (ix) Outlook spaces must: • Be clear and unobstructed by buildings; and • Not extend over an outlook space or outdoor living space required by another dwelling.
Active frontages	No roller doors, or similar, which may obscure windows or entranceways, may be installed on the front of any building fronting a vested reserve, or a vested road, or road/ transport corridor.



TE KOWHAI EAST SPECIFIC DEFINITIONS

If the definition is not included in this Development Framework, the definitions in Volume 2, Section 1.1 of the HCC ODP and Section 2 of the Resource Management Act 1991 will apply.

Ancillary residential unit: Means a self-contained dwellinghouse and held in common ownership with the primary activity on the site and ancillary to that activity (e.g. accommodation for a caretaker, live-in employee or security staff). To be self-contained, the ancillary residential unit must have a kitchen, bathroom, bedroom(s), living room and laundry facilities. The ancillary residential unit must be attached to the principal building.

Battery storage facility: Means land, buildings and infrastructure used for the storage of electrical energy in batteries and its subsequent discharge to an electricity network or on-site electricity system, together with associated electrical and ancillary infrastructure.

Boarding kennels and catteries: means any land, structures or buildings used for the purpose of accommodating dogs or cats on a commercial basis, but does not include the keeping of dogs or cats as an ancillary activity for domestic purposes, or the keeping of dogs to assist in the management of a farm or other rural activity.

Data centre: Means land and buildings used principally to house computer systems, servers and associated equipment for the storage, processing, management or transmission of digital data, and includes associated telecommunications equipment, cooling systems, backup power generation, battery systems and other ancillary infrastructure.

Health Facility: Means a facility for the care or welfare of people. It includes non-residential day hospitals or facilities used by any of the following practitioners:

- (a) Medical practitioners,
- (b) Dentists,
- (c) Optometrists,
- (d) Acupuncturists,
- (e) Osteopaths, or
- (f) Persons involved in alternative forms of medicine.

Industrial Activity in this Development Framework includes:

- a. All types of processing, manufacturing, service and repair activities
- b. Laboratories and research facilities
- c. Transport depots.

Office Activity in this Development Framework means premises used for administration, consultation, or management of and shall include:

- a. Administrative offices for the purposes of managing the affairs of an organisation, whether or not trading is conducted.
- b. Commercial offices such as banks, insurance agents, or real estate agents where trade (other than for the immediate exchange of money for goods) is transacted.



- c. Professional offices such as the offices of accountants, solicitors, architects, engineers, surveyors, stockbrokers, and consultants where a professional service is available and carried out.

Outdoor golf driving range: Means land and buildings used principally for the practice of golf, including the hitting of golf balls from designated bays or teeing areas into an outdoor range, and may include ancillary indoor golf simulators, golf coaching and training facilities, equipment hire, a golf retail shop, administration areas, changing facilities, food and beverage activities, lighting, and safety netting.

Primary frontage: Primary frontage is the longest frontage and/or the frontage where the main access is from.

Supermarket: In this Development Framework includes:

An individual retail outlet having a store footprint of less than 1,000m² GFA that sells, primarily by way of self service, a comprehensive range of:

- a. domestic supplies, fresh food, groceries, such as fresh meat and produce; chilled, frozen, packaged, canned and bottled foodstuffs and beverages; and general housekeeping and personal goods, including (but not limited to) cooking, cleaning and washing products; kitchenwares; toilet paper, diapers and other paper tissue products; pharmaceutical, health and personal hygiene products and other toiletries; cigarettes, magazines and newspapers, greeting cards and stationery, batteries, flashlights, light bulbs and related products; and
- b. non-domestic supplies and comparison goods comprising not more than 20 per cent of all products offered for sale as measured by retail floor space, including (but not limited to) clothing and footwear; furniture; electrical appliances; office supplies; barbecue and heating fuels; audio visual products.

Wholesale membership retail: Means a large-format retail activity where access to purchase goods is generally limited to members or account holders, and goods are sold primarily in bulk quantities or larger package sizes for business, household or institutional use.

Wholesale retail and trade supplier: Means premises that engage primarily in the storage, distribution and sale of goods to other businesses (rather than the general public, although it may include a minor proportion of its sales to the general public), including premises engaged in supplying the construction and building industries, such as plumbing and building materials, farming and primary production supplies (including seed and grain merchants, farming and horticultural equipment suppliers, and equestrian and veterinary suppliers).

Yard-based retailing: Means a retail activity selling or hiring products where more than half of the display area (not including any parking, servicing, landscaping or manoeuvring areas) is located outside of an enclosed building. Such activities include, but are not limited to car, boat and heavy machinery sales yards; garden centres and landscaping supplies; automotive and boating accessories; trailer and caravan sales yards, building and farm supply outlets, and hire pools.





Development Framework Justification

Te Kowhai East Industrial Development

1. Purpose

This document provides the planning justification for the Te Kowhai East Development Framework (Development Framework), which forms part of the substantive application and is embedded in the proposed land use consent conditions.

The Development Framework establishes the ongoing planning framework for the future use and development of TKE, including the activities provided for within different parts of the Site and the development standards applying to those activities.

As described in Section 3.1.2 of Volume A, the Development Framework uses the Industrial Zone provisions of the Hamilton City Council Operative District Plan (HCC ODP) as its starting point, with amendments to reflect the Site's location, Masterplan and intended development outcomes. In developing the Development Framework, consideration was also given to relevant provisions of the Waikato District Plan, where these provided useful comparators for the activities and development standards proposed at TKE.

This document does not provide a clause-by-clause assessment of provisions adopted directly or substantially from the HCC ODP. Rather, it explains the overall approach and provides further justification for provisions that materially differ from the HCC ODP or have been the subject of particular discussion during preparation of the substantive application.

2. Development Framework Approach

2.1 Purpose of the Development Framework

The Development Framework forms part of the land use consent decision for TKE and provides the ongoing planning framework for development across the Site.

It identifies the activities authorised within different parts of TKE, together with the relevant development standards, thresholds and locational restrictions that will apply as individual lots are developed.



This approach was contemplated through the TKE Planning and Infrastructure Brief¹ which identified the Development Framework and Masterplan as key components of the substantive application and anticipated that the Development Framework would identify the activities authorised or excluded by the land use consent and include appropriate development standards.

Embedding the Development Framework within the consent conditions provides an enduring mechanism for administering future development while retaining control over the nature, scale and location of activities authorised through the substantive application.

2.2 Relationship with Masterplan

The Development Framework operates alongside the TKE Masterplan.

The Masterplan establishes the principal spatial structure for TKE, including the Mangaheka Stream corridor, movement network, industrial development blocks, Neighbourhood Centre, Non-industrial Precinct, stormwater areas and landscape framework.

The Development Framework translates that spatial structure into the ongoing land use controls applying to future development. The two therefore perform complementary functions: the Masterplan establishes the spatial form of TKE, while the Development Framework regulates the nature, scale and location of activities within it.

2.3 Use of the HCC Operative District Plan

The HCC ODP Industrial Zone provisions have been used as the principal regulatory reference point for the Development Framework. This reflects TKE's location adjoining Hamilton City and the established Te Rapa industrial area and provides a familiar basis for the future administration of industrial development within the Site.

However, the Development Framework was not intended to simply replicate the HCC ODP Industrial Zone provisions. Earlier work on the planning framework recognised the need to maintain industrial primacy while allowing a limited range of supporting activities necessary for the effective functioning of a modern industrial area, together with activities whose scale or operational requirements mean they cannot reasonably be accommodated within conventional business zones.

The approach also responds to HCC's concern with the uncoordinated establishment of commercial and community activities within existing industrial areas. TKE instead uses a combination of spatial controls and performance standards to maintain industrial primacy while providing for appropriate supporting activities. Accordingly, some activities are confined to defined locations (i.e. the non-industrial precinct), while others with operational characteristics comparable to industrial activities are managed through activity-specific standards. Existing HCC provisions and definitions have been retained where appropriate.

¹ Prepared by HCC in collaboration with the Fast Track Action Team and the TKE development team. Current version dated 30 July 2026



The Neighbourhood Centre provisions have similarly been developed using the HCC ODP Business 6 Zone provisions as the principal reference point, with amendments to reflect the intended scale, function and location of the TKE Neighbourhood Centre.

The Development Framework does not rezone the Site and is not a plan change. The underlying zoning remains General Rural under the WDP OiP. Rather, the Development Framework forms part of the land use consent conditions and provides the site-specific planning framework necessary to implement the industrial development authorised.

The departures from the HCC ODP are therefore targeted, site-specific modifications to an established planning framework.

3. Specific Development Framework Provisions

The Development Framework generally adopts the relevant HCC ODP Industrial Zone and Business 6 Zone provisions, with targeted amendments to reflect the Site, Masterplan and intended development outcomes.

The following sections address those provisions that materially differ from the HCC ODP or have been the subject of particular discussion with HCC. The focus is on the reason for the departure and the controls included within the Development Framework to manage the relevant effects.

3.1 Industrial Activities Table

The Industrial Activities Table generally reflects the range of activities anticipated within an industrial environment. However, a small number of activities differ from HCC's current position or require specific explanation.

The following table summarises those differences, the approach adopted in the Development Framework and the planning and effects justification for that approach.

Matter	HCC ODP/HCC position	TKE Development Framework	Planning/effects justification
Battery storage facilities and data centres	Neither activity is specifically provided for in the HCC ODP. HCC has sought justification for their inclusion.	Battery storage facilities and data centres are specifically listed as activities within the industrial area.	Both activities are logically suited to an industrial environment and are increasingly forming part of the modern industrial and infrastructure development. Their specific inclusion provides certainty that the land uses are contemplated within TKE rather than relying on interpretation of older activity definitions. Their inclusion does not override other applicable Development Framework or district-wide controls. In particular, where a data centre triggers provisions relating to high water-user activities, those provisions continue to apply. This is a separate consideration from whether data centres are an appropriate land use within the



			industrial area.
Ancillary residential units	HCC's current feedback is to limit ancillary residential accommodation to boarding kennels and catteries. The HCC ODP nevertheless provides for ancillary residential activity more broadly within the Industrial Zone as a controlled activity. The relevant assessment matters include character and amenity, and hazards and safety.	TKE provides for one ancillary residential unit per site and per principal industrial activity, subject to the 250 vehicle movement per day threshold and the applicable site performance standards. Activity-specific standards also apply to internal noise, acoustic insulation, alternative ventilation and acoustic certification.	TKE seeks a broader role for ancillary residential accommodation than HCC's current feedback, but the approach is consistent with the HCC ODP in principle. The 250 vehicle movement threshold adopts an established HCC ODP benchmark, while activity-specific standards manage reverse-sensitivity, internal amenity, character and amenity, and hazards and safety. The controls ensure the accommodation remains ancillary and does not undermine the predominant industrial function of TKE.

3.2 Non-industrial land uses table

The Non-industrial Precinct provides for a limited complementary range of non-industrial activities that are compatible with, and complementary to, the wider industrial development.

Most of the activities within the precinct are either agreed or subject to specific controls within the Development Framework. In particular, the outdoor golf driving range is subject to activity-specific standards, which are accepted by TKE. Wholesale membership retail is the principal activity that differs from HCC's current position and requires further explanation.

The following table summarises the relevant difference, the approach adopted in the Development Framework and the planning and effects justification for that approach.

Matter	HCC ODP/HCC position	TKE Development Framework	Planning/effects justification
Wholesale membership retail	HCC has sought specific controls for wholesale membership retail, including traffic management and site layout requirements. TKE accepts those controls. HCC	One wholesale membership retail activity is provided for within the Non-industrial Precinct, subject to the specific performance standards proposed by HCC. TKE does not propose to limit the activity to	The Non-industrial Precinct provides an appropriate location for this large-format wholesale activity while maintaining the industrial primacy of the wider Site. The ITA specifically tested a 5 ha wholesale membership retail activity in both 2035 and 2045 and found its effect on the WRTM outputs to be negligible. It also tested alternative locations within the Site and found that location had minimal effect on trip distribution. Accordingly, the



	has also proposed that the activity be limited to Stages 3 and 4.	Stages 3 and 4 (even though part of the non-industrial precinct is within those stages).	transport assessment does not identify a need to restrict the activity to Stages 3 and 4. The accepted activity-specific standards provide the appropriate mechanism for managing site-specific transport effects, including assessment of traffic generated by the particular scale and type of activity.
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3.3 Within the Neighbourhood Centre

The Neighbourhood Centre activity framework is based on the HCC ODP Business 6 Zone provisions, with targeted amendments to reflect the intended scale and function of the TKE Neighbourhood Centre. The activities provided for are generally consistent with that framework, with a number subject to specific scale or built-form standards within the Development Framework. No Neighbourhood Centre activities require further justification.

3.4 Not provided for within Development Framework

The activities identified as not provided for within TKE generally reflect activities that are non-complying within the HCC ODP Industrial Zone. Their exclusion is therefore consistent with the industrial framework used as the basis for the Development Framework. HCC has additionally sought the exclusion of wet industry. This is the only matter requiring further explanation, as per the following table.

Matter	HCC ODP/HCC position	TKE Development Framework	Planning/effects justification
Wet industry	HCC has sought to include wet industry as an activity not provided for within TKE. The Planning and Infrastructure Brief similarly records an intended outcome that there be no wet industries, including high water-user data centres.	TKE does not propose a blanket exclusion of “wet industry”. Instead, the Development Framework addresses the relevant issue through the specific controls applying to high water-user activities.	TKE considers there is an important distinction between “wet industry” and a “high water-user activity”. Wet industry is a broad description of a type of industrial activity, whereas high water use relates to the actual water demand generated by an activity. The two may overlap, but they are not synonymous. The relevant planning issue is whether an activity generates a level of water demand that requires specific management, rather than whether an activity falls within a broad description of “wet industry”. High water-user controls already address



			that issue, without needing to be specified in this Development Framework.
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3.5 Industrial site performance controls

The industrial site performance standards establish the built-form, setback, landscaping and site-layout controls applying to development within the industrial areas of TKE. The standards have been developed principally from the HCC ODP Industrial Zone provisions, with targeted amendments to reflect the Site, Masterplan and adjoining environment.

The standards address site coverage, building setbacks and height, height in relation to boundary, permeable surfaces, landscaping and site layout. Where the standards are consistent with, or have been agreed through engagement with HCC, no further justification is required.

The following table addresses those standards that materially differ from the HCC ODP or otherwise require specific explanation.

Matter	HCC ODP/HCC position	TKE Development Framework	Planning/effects justification
Building setbacks	HCC has sought clarification on how the proposed 15 m setback relates to the perimeter landscape buffer, whether buildings are setback from the buffer, and whether the buffer is intended to vest in HCC. HCC has also sought a 3 m building setback from land vested for drainage or recreational reserve purposes to align with the HCC ODP provisions.	A 15 m building setback applies where industrial sites directly adjoin Rural-zoned land. Around the majority of the Site, a 16 m wide landscape/stormwater buffer is provided between industrial sites and the Site boundary. The 15 m setback does not additionally apply in these locations. The buffer will vest in Council due to its stormwater function. TKE does not propose a further 3 m building setback from the internal edge of the vested buffer.	The 16 m landscape/stormwater buffer provides physical separation and landscape treatment between industrial development and adjoining rural land and exceeds the separation otherwise achieved by the 15 m building setback. Where no such buffer is provided and an industrial site directly adjoins Rural-zoned land, the 15 m building setback applies. The Masterplan and stormwater approach result in a significantly greater extent of land being set aside and vested for drainage and reserve purposes than would typically occur within an industrial area. Requiring an additional 3 m building setback from the internal edge of those areas would result in a further loss of developable land without a corresponding effects-management benefit. Given the size and scale of the proposed reserves and landscape/stormwater corridors, no particular CPTED or amenity issues are anticipated that would justify the additional setback.
Height in relation to boundary	HCC has sought that the height in relation to boundary control applies to	The Development Framework applies the control to boundaries adjoining vested reserves. Reference to land “zoned for open space	The Development Framework is not a plan change and does not rezone land within the Site. Accordingly, there will be no land within TKE that is zoned for open space purposes under the Development



	any boundary adjoining a vested reserve or land zoned for open space purposes.	purposes” is not included.	Framework. The relevant interface is instead land that is vested as reserve, and the height in relation to boundary control appropriately applies to those boundaries.
Permeable surfaces	The HCC ODP Industrial Zone requires a minimum 10% permeable surface area.	The Development Framework provides for 0% permeable surface where a site adjoins a vested reserve, with a minimum 10% permeable surface requirement otherwise.	The Masterplan and stormwater approach provide a significant extent of dedicated stormwater, landscape and reserve land across the Site. Where an industrial site directly adjoins those areas, requiring a further 10% permeable area within the lot would duplicate functions already provided at a wider site level and further reduce developable land. The 0% provision is therefore limited to sites adjoining vested reserve land, with the 10% minimum retained elsewhere.

3.6 Activity Specific Standards

The Development Framework includes a number of activity-specific and subdivision standards that supplement the general site performance standards. These controls respond to the particular characteristics of certain activities and are intended to manage their scale, location and potential effects, while retaining flexibility for future development within TKE.

The standards address ancillary retail and office activities, ancillary residential units, outdoor golf driving ranges, food and beverage outlets, wholesale membership retail and subsequent subdivision. Where relevant, the controls reflect matters raised through engagement with HCC and the technical assessments prepared for the Project. The following table addresses those standards that require specific explanation.

Matter	HCC ODP/HCC position	TKE Development Framework	Planning/effects justification
Ancillary residential units			See commentary in section 3.1 above.
ITA requirements for all activities	HCC has sought an ITA for all activities generating more than 100 vehicle movements per day.	TKE does not propose to adopt the 100 vehicle movement threshold. The HCC ODP threshold for requiring an ITA is 500 vehicle movements per day for a simple ITA and 1500 vpd for a broad ITA.	The 100 vehicle movement threshold would represent a significant departure from the HCC ODP and is not supported by the transport assessment for TKE. The ITA has comprehensively assessed the transport effects of the overall development, including full build-out, land-use distribution and effects on the wider network. It concludes that TKE can be accommodated within the existing and planned transport network



			without unacceptable adverse transport effects. Where a particular activity warrants additional assessment because of its characteristics, this can be addressed specifically, as proposed for wholesale membership retail. A blanket reduction of the HCC ODP thresholds from 500/1,500 vehicle movements per day to 100 vehicle movements per day is therefore not considered necessary or effects-based.
Wholesale membership retail	HCC has proposed a number of site-specific standards for this activity.	TKE supports those standards, apart from the requirement that wholesale membership retail be limited to Stages 3 and 4, as addressed in Section 3.2 above.	The accepted standards appropriately manage the site-specific transport and layout effects of the activity. The remaining point of difference is limited to staging. As set out in Section 3.2, the ITA sensitivity testing found that wholesale membership retail had negligible effects on the wider transport network in both the 2035 and 2045 scenarios, and that its location within the Site had minimal effect on trip distribution. Accordingly, a restriction to Stages 3 and 4 is not considered necessary to manage transport effects.
Subdivision	HCC has proposed additional subdivision standards applying to changes to the approved subdivision, including a minimum lot size of 1,000 m ² , a 10% limit on changes to consented lot areas, a 20 m shape factor, no new rear lots and no additional lots.	TKE proposes that the subdivision standards apply to any subsequent subdivision, including changes to the approved subdivision. A minimum net site area of 1,000 m ² applies to front lots and 500 m ² to rear lots, except where subdivision creates separate titles for individual units within an established or consented development. Front lots must have at least 15 m road frontage, and connect to public-reticulated water and wastewater.	The subdivision provision provides an ongoing framework for subsequent subdivision as TKE develops. This aligns with the consent conditions, which already allow changes to staging and lot layout subject to minimum lot size, frontage, access, servicing and stormwater requirements. Additional controls limiting lot-area changes to 10%, requiring a shape factor, prohibiting rear lots or preventing additional lots are therefore not considered necessary and would unnecessarily constrain the flexibility already built into the consent framework.

3.7 Neighbourhood Centre Performance Standards

The Neighbourhood Centre performance standards address building setbacks and height, service areas, outdoor storage, residential amenity and active frontages. They are generally based on the HCC ODP Business 6 Zone provisions, with targeted amendments to reflect the intended form and function of the TKE Neighbourhood Centre.

No specific departures or matters of contention have been identified that require further planning or effects justification.

