

Appendix B – Objectives and Policies Assessment





Objectives and Policy Assessment

Te Kowhai East Industrial Development

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Te Ture Whaimana o te Awa o Waikato – Vision and Strategy for the Waikato River

Vision and Strategy for the Waikato River Objective/Policy assessment	
Obj/Pol Provision	Comments
Objectives	
<i>The restoration and protection of the health and wellbeing of the Waikato River</i>	The Project aligns with the restoration and protection direction of Te Ture Whaimana through the restoration and enhancement of the Mangaheka Stream corridor, riparian planting, ecological restoration, black mudfish habitat creation, improved fish passage and an integrated stormwater management framework. These measures are intended to improve water quality, freshwater habitat, ecological function and the health and resilience of the wider catchment. Importantly, the Project does not rely on the degraded condition of the existing Mangaheka Stream and drainage network as justification for further degradation, but instead seeks improved freshwater outcomes over time. Overall, the Project is considered generally consistent with this objective.
<i>The restoration and protection of the relationship of Waikato-Tainui with the Waikato River, including their economic, social, cultural, and spiritual relationships</i>	The Project has been informed by engagement with tangata whenua through the TWWG, hui, technical engagement and preparation of the CIA. Freshwater values, the Mangaheka Stream, stormwater management, ecological restoration and Te Ture Whaimana have been central matters in that engagement. The proposed Tangata Whenua Management Plan will provide for ongoing mana whenua involvement during implementation, including cultural monitoring, cultural protocols and input into ecological restoration and environmental management.
<i>The restoration and protection of the relationship of Waikato River iwi according to their tikanga and kawa, with the Waikato River, including their economic, social, cultural and spiritual relationships.</i>	The Project also seeks to improve the environmental condition of freshwater environments that form part of the wider Waikato River catchment, supporting the ongoing relationship of tangata whenua and communities with those environments.
<i>The restoration and protection of the relationship of the Waikato region's communities with the Waikato River including their economic, social, cultural and spiritual relationships.</i>	The Project is therefore considered generally consistent with these objectives.
<i>The integrated, holistic and coordinated approach to management of the natural, physical, cultural and historic resources of the Waikato River.</i>	The Project adopts an integrated approach to land use, freshwater, groundwater, stormwater, flooding, ecology, infrastructure and cultural values. The stormwater framework has been developed at a catchment scale across the Mangaheka, Te Rapa and Te Otamanui catchments and considers downstream receiving environments. Ecological restoration, flood management, infrastructure and cultural outcomes have also been incorporated into the development outcome rather than addressed independently.



	The Project is therefore considered consistent with the integrated and holistic management direction of this objective.
<i>The adoption of a precautionary approach towards decisions that may result in significant adverse effects on the Waikato River, and in particular those effects that threaten serious or irreversible damage to the Waikato River.</i>	The Project recognises that the Waikato River and its tributaries are already degraded and should not be required to absorb further degradation. The stormwater and freshwater framework therefore incorporates source controls, treatment trains, attenuation, erosion control, stream restoration and ecological enhancement intended to manage development-related effects and improve freshwater outcomes over time.
<i>The recognition and avoidance of adverse cumulative effects, and potential cumulative effects, of activities undertaken both on the Waikato River and within its catchments on the health and wellbeing of the Waikato River.</i>	The assessment has also considered effects at a catchment scale, including downstream flood, water-quality and ecological effects. Where uncertainty remains, monitoring, management plans and adaptive responses are proposed. These measures are considered to respond appropriately to the precautionary and cumulative-effects direction of Te Ture Whaimana.
<i>The recognition that the Waikato River is degraded and should not be required to absorb further degradation as a result of human activities.</i>	
<i>The protection and enhancement of significant sites, fisheries, flora and fauna.</i>	The Project will affect parts of the existing freshwater environment, including artificial drains supporting black mudfish and one watercourse that will be reclaimed. Those effects are proposed to be managed through fish salvage and relocation, dedicated black mudfish habitat creation, stream creation and restoration, riparian planting and improved fish passage. The Mangaheka Stream corridor will also be substantially enhanced to improve habitat diversity and ecological connectivity. The Project is therefore considered generally consistent with the objective to protect and enhance fisheries, flora and fauna.
<i>The recognition that the strategic importance of the Waikato River to New Zealand's social, cultural, environmental and economic wellbeing is subject to the restoration and protection of the health and wellbeing of the Waikato River.</i>	The Project recognises that social and economic development within the Waikato River catchment must occur within a framework that prioritises restoration and protection of the health and wellbeing of the River. The Project will provide substantial industrial development capacity, employment and infrastructure investment, while also incorporating a significant programme of freshwater restoration, stormwater treatment and ecological enhancement. The Project is therefore considered generally consistent with this objective.
<i>The restoration of water quality within the Waikato River so that it is safe for people to swim in and take food from over its entire length.</i>	The Project incorporates an integrated stormwater treatment train including source controls, raingardens, vegetated conveyance systems, constructed wetlands and controls for higher-risk industrial activities. These measures, together with riparian restoration and enhancement of the Mangaheka Stream corridor, are intended to improve the quality of stormwater entering the freshwater receiving environment and contribute to improved water quality within the wider catchment. The Project is considered consistent with the restoration direction of this objective.



<i>The promotion of improved access to the Waikato River to better enable sporting, recreational, and cultural opportunities.</i>	The Project does not directly affect public access to the Waikato River and this objective is not directly engaged. The Project will, however, create an enhanced Mangaheka Stream and open-space corridor within the Site, including walking and cycling connections that improve access to and appreciation of freshwater environments at a local level.
<i>The application to the above of both mātauranga Māori and latest available scientific methods.</i>	The Project has been informed by both mātauranga Māori and contemporary scientific and technical assessment. Mana whenua input through the TWWG, hui and CIA has informed the understanding of cultural values, freshwater outcomes and ecological restoration priorities. That input has been considered alongside technical investigations and assessments relating to freshwater ecology, stormwater, hydrology, hydrogeology, geotechnical matters and environmental effects. The Project therefore reflects an integrated approach that draws on both mātauranga Māori and the latest available scientific methods, consistent with this objective.

Overall, the Project is considered generally consistent with Te Ture Whaimana. The Project will modify parts of the existing freshwater environment, but it incorporates a significant programme of stormwater treatment, stream restoration, riparian enhancement, habitat creation and fish-passage improvement. The Project has also been developed through active engagement with tangata whenua and provides for ongoing mana whenua involvement during implementation.

Importantly, the Project does not rely on the existing degraded condition of the Mangaheka Stream and associated drainage network as justification for further degradation. Rather, the proposed freshwater and stormwater framework seeks to improve the health, ecological function and resilience of those environments over time.



National Policy Statement for Urban Development 2020

NPS-UD Objective/Policy assessment	
Obj/Pol Provision	Comments
Objectives	
Objective 1: <i>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.</i>	The Project will contribute to a well-functioning urban environment by providing approximately 123 ha of net developable industrial land immediately adjoining the established Te Rapa industrial area. The Economic Assessment identifies industrial land demand in Hamilton at approximately 17–25 ha per annum and concludes that the Project represents approximately 7–11 years of future industrial land demand. It also identifies a spatial imbalance in remaining industrial land supply, with a substantial proportion of vacant land located at Ruakura while north-west Hamilton is more reliant on the more constrained Te Rapa industrial node. TKE will materially increase industrial land supply in the north-west, adjacent to Hamilton's largest industrial employment concentration and close to significant planned residential growth. The Project is comprehensively masterplanned and integrates transport, stormwater, water supply, wastewater, ecological enhancement and open space with future industrial development. The Project is therefore considered to support a well-functioning urban environment consistent with Objective 1.
Objective 4: <i>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.</i>	The Project will result in a substantial change to the existing rural character and amenity of the Site through its development as a large-scale industrial area. That change occurs in a locality that is already transitioning, with the established Te Rapa industrial area immediately adjoining the Site and further urban and industrial growth occurring across north-west Hamilton. The Project has been masterplanned to manage the interface between the new industrial environment and adjoining land through landscape buffers, stormwater and ecological corridors, setbacks, streetscape treatment and controls on the location of non-industrial activities. The change in character associated with the Project is therefore consistent with the NPS-UD's recognition that urban environments and their amenity values evolve over time in response to growth and changing community needs.
Objective 6 <i>Local authority decisions on urban development that affect urban environments are:</i> <i>integrated with infrastructure planning and funding decisions;</i>	The Project represents a significant addition to industrial development capacity within the Hamilton Tier 1 urban environment, providing approximately 123 ha of net developable industrial land. The Project has been comprehensively masterplanned and is supported by an integrated and staged infrastructure framework addressing transport, stormwater, water supply, wastewater and utilities. Infrastructure delivery is linked to development staging and capacity, ensuring that industrial development is coordinated with the infrastructure required to service it.



• <i>strategic over the medium term and long term; and</i> • <i>responsive, particularly in relation to proposals that would supply significant development capacity.</i>	The Project also responds to identified medium- and long-term industrial land demand. The Economic Assessment identifies demand at approximately 17–25 ha per annum and concludes that TKE represents approximately 7–11 years of future demand. Accordingly, the Project is considered consistent with Objective 6 because it represents a strategic and infrastructure-integrated response to a significant business land development opportunity.
Policies	
Policy 1: <i>Planning decisions contribute to well-functioning urban environments.</i>	The Project responds particularly to Policy 1(b), (c) and (d). TKE will provide a variety of industrial sites suitable for different business sectors in terms of both location and size. The proposed subdivision includes a range of lot sizes and provides flexibility for lots to be combined to accommodate larger industrial occupiers. The Project is located adjacent to the Te Rapa industrial area and close to major planned residential growth at Rotokauri/Te Kowhai and other northern growth areas. This improves the relationship between employment land and future population growth while maintaining access to the strategic transport network. The Economic Assessment also identifies that remaining vacant industrial land is concentrated in a limited number of locations and ownerships. TKE will provide a substantial additional source of industrial land in the north-west and therefore support the competitive operation of the industrial land and development market. The Project is therefore considered consistent with the relevant components of Policy 1.
Policy 2: <i>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.</i>	The Economic Assessment identifies approximately 452 ha of vacant industrial land within Hamilton and estimates industrial land demand at approximately 17–25 ha per annum. This equates to approximately 18–26 years of existing supply, with a long-term shortfall anticipated and a significant proportion of remaining vacant land concentrated in a small number of ownerships. Those findings are broadly consistent with the HCC Industrial Land Projections 2025, which identifies long-term industrial demand of approximately 20–25 ha per annum under the medium and high growth scenarios. TKE will provide approximately 123 ha of additional net developable industrial land and therefore make a material contribution towards meeting expected long-term business land demand within the Hamilton urban environment. The Project is considered consistent with the direction of Policy 2.
Policy 6: <i>When making planning decisions that affect urban environments, decision-makers must have particular regard to:</i> • <i>the planned urban built form;</i> • <i>the fact that urban development may result in significant changes to amenity values;</i>	The Project will result in significant change to the existing rural character and amenity of the Site. However, the NPS-UD expressly recognises that urban development may change amenity values and that such change is not, of itself, an adverse effect. The Project will provide substantial benefits associated with a well-functioning urban environment, including approximately 123 ha of additional industrial development capacity, a range of industrial sites suitable for different business sectors, improved spatial distribution of employment land and closer alignment between employment and future population growth.



• <i>the benefits of urban development consistent with well-functioning urban environments;</i> • <i>any contribution to providing or realising development capacity; and</i> • <i>climate-change effects.</i>	The Project also makes a material contribution to long-term industrial development capacity in Hamilton, with the Economic Assessment concluding that it represents approximately 7–11 years of future industrial land demand. The Project has nevertheless been designed to manage the interface with surrounding land through landscape buffers, ecological and stormwater corridors, setbacks and development controls. Accordingly, the Project is considered consistent with the relevant direction in Policy 6.
Policy 8: <i>Local authority decisions affecting urban environments are responsive to plan changes that would add significantly to development capacity and contribute to well-functioning urban environments, even if the development capacity is:</i> (a) <i>Unanticipated by RMA planning documents; or</i> (b) <i>Out-of-sequence with planned land release.</i>	Policy 8 requires local authority decisions affecting urban environments to be responsive to plan changes that add significant development capacity and contribute to well-functioning urban environments, including where that capacity is unanticipated or out of sequence. Clause 3.8 confirms that this policy is specifically implemented through plan changes. The Project is not a plan change and Policy 8 therefore does not directly govern the substantive application. Its direction is nevertheless relevant context because TKE represents a significant industrial development opportunity that is not presently enabled by the General Rural zoning of the Site. The Project will add approximately 123 ha of net industrial land, represents approximately 7–11 years of future Hamilton industrial demand, is well connected to the strategic transport network and adjoins the established Te Rapa industrial area. Accordingly, while Policy 8 is not directly relied upon, the Project is consistent with the broader responsive-planning direction reflected in that policy.

Overall, the Project is considered consistent with the Objective and relevant policies of the NPS-UD. It will provide a substantial addition to industrial development capacity within the Hamilton urban environment, in a location immediately adjoining the established Te Rapa industrial area and strategic transport network.

The Project responds to identified medium- and long-term demand for industrial land, improves the spatial distribution of industrial capacity within north-west Hamilton, and provides a range of sites capable of accommodating different business sectors and occupiers. It has also been comprehensively masterplanned and integrated with the transport, three-waters and other infrastructure required to service the Development.

The Project will result in significant change to the existing rural character and amenity of the Site. However, that change occurs within a locality that is already transitioning and is consistent with the NPS-UD's recognition that urban environments and their amenity values develop and change over time.

While Policy 8 is not directly engaged because the Project is not a plan change, its broader responsive-planning direction is relevant. TKE represents a significant development opportunity that is not presently anticipated by the General Rural zoning of the Site but would make a material contribution to a well-functioning urban environment and to meeting future industrial land demand.

Accordingly, the Project strongly supports the strategic direction of the NPS-UD for well-functioning urban environments, sufficient development capacity, integrated infrastructure planning and responsiveness to significant development opportunities.



National Policy Statement for Freshwater Management 2020

NPS-FM Objective/Policy Assessment	
Obj/Pol Provision	Comments
Objective	
<i>The objective of this National Policy Statement is to ensure that natural and physical resources are managed in a way that priorities:</i> <i>(a) First the health and well-being of water bodies and freshwater ecosystems</i> <i>(b) Second, the health needs of people (such as drinking water)</i> <i>(c) Third, the ability of people and communities to provide for their social, economic, and cultural well-being, now and into the future</i>	The NPS-FM provides national direction for the management of freshwater, including rivers, streams, groundwater and associated receiving environments. It is underpinned by Te Mana o te Wai, which establishes a hierarchy of obligations that prioritises first the health and wellbeing of water bodies and freshwater ecosystems, second the health needs of people, and third the ability of people and communities to provide for their social, economic and cultural wellbeing. The NPS-FM is directly relevant because the Project involves substantial land-use change, stormwater discharges, earthworks, stream modification, culverts, groundwater management and associated effects on freshwater environments within the Mangaheka, Te Rapa and Te Otamanui catchments. Freshwater values have been a significant influence on the Project design. The Mangaheka Stream corridor has been retained as a central element of the Masterplan and will be reconstructed and enhanced through a widened flood corridor, a meandering baseflow channel, riparian planting and habitat enhancement. The Te Otamanui Stream will also be retained and enhanced. The Project adopts an integrated catchment-based approach to freshwater and stormwater management. Stormwater will be managed through a treatment train incorporating source controls, raingardens, vegetated conveyance systems, constructed wetlands, attenuation and stream enhancement. The stormwater strategy has been developed having regard to the Mangaheka, Te Rapa and Te Otamanui catchments and their downstream receiving environments. This is consistent with Policy 3, which requires freshwater to be managed on a whole-of-catchment basis, including effects on receiving environments. The Project will modify existing freshwater environments. In particular, approximately 212 m of Watercourse M13 will be reclaimed. Clause 3.24 of the NPS-FM requires the loss of river extent and values to be avoided unless there is a functional need for the activity in that location and the effects are managed through the effects management hierarchy. The EclA applies that framework and proposes stream creation and enhancement within the Mangaheka Stream corridor to address the loss of M13, resulting in a net gain in stream length and habitat area. The Project will also affect freshwater habitat through modification of the Mangaheka Stream and parts of the wider drainage network. Those effects are proposed to be managed through stream restoration, riparian planting, fish salvage and relocation, black mudfish habitat creation and fish-passage measures. Existing culverts within the Site are generally of poor condition and some restrict fish passage. Replacement culverts will be designed to provide for fish passage in accordance with the NES-F and relevant fish-passage guidance.



	No natural inland wetlands have been identified within the Project Area for the purposes of the NPS-FM. The EclA records that the small areas of damp pasture and pooled water do not meet the RMA definition of wetland and therefore the natural inland wetland provisions in clause 3.22 are not directly engaged. The Project also incorporates climate-change allowances into its stormwater and flood-management framework and provides for ongoing mana whenua involvement in freshwater management through the TWWG, CIA and proposed Tangata Whenua Management Plan. Overall, while the Project will modify parts of the existing freshwater environment, it is assessed as being generally consistent with the relevant objective and policies of the NPS-FM. The Project prioritises freshwater health through integrated catchment management, stream restoration, water-quality treatment, habitat enhancement and fish passage, while managing unavoidable river effects through the effects management hierarchy.
Policies	
Policy 1: <i>Freshwater is managed in a way that gives effect to Te Mana o te Wai</i>	The Project has been designed having regard to Te Mana o te Wai, with freshwater health and ecological restoration integrated into the Masterplan and stormwater framework. The Mangaheka Stream corridor is retained and substantially enhanced, while stormwater treatment, riparian planting, habitat creation, fish passage and ecological management are intended to maintain and improve freshwater ecosystem health. While some modification of freshwater environments is unavoidable, the Project has sought to avoid or minimise adverse effects where practicable and otherwise manage them through restoration, remediation, habitat creation and other measures applied through the effects management hierarchy. Accordingly, the Project is considered generally consistent with Policy 1.
Policy 2: <i>Tangata whenua are actively involved in freshwater management (including decision-making processes), and Māori freshwater values are identified and provided for.</i>	Tangata whenua have been actively involved through the TWWG, hui, technical engagement and preparation of the CIA. Freshwater matters have been a central focus of that engagement, including the Mangaheka Stream, stormwater management, ecological restoration, fish habitat and Te Ture Whaimana. The proposed Tangata Whenua Management Plan will provide for ongoing mana whenua involvement during implementation, including cultural monitoring and involvement in ecological restoration and enhancement areas. The Project therefore provides for tangata whenua involvement and recognition of Māori freshwater values consistent with Policy 2.
Policy 3: <i>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.</i>	The Project adopts an integrated catchment-based approach to freshwater management, recognising the relationship between land use, stormwater, freshwater ecosystems, groundwater and downstream receiving environments. The stormwater framework has been developed having regard to the Mangaheka, Te Rapa and Te Otamanui catchments and relevant catchment-management planning. It incorporates source treatment, conveyance, constructed stormwater wetlands, attenuation and stream restoration, with the objective of managing water quality, flood effects and ecological outcomes on a catchment-wide basis. The Project is therefore considered consistent with Policy 3.



Policy 4: <i>Freshwater is managed as part of New Zealand's integrated response to climate change.</i>	The Project has incorporated climate change considerations into the design of its stormwater management and flood mitigation systems. Climate change-adjusted rainfall projections have been adopted for the design and assessment of the stormwater network, constructed stormwater wetlands and flood management framework to ensure the Development remains resilient to anticipated future rainfall intensity and flood risk.
Policy 5: <i>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.</i>	The Project has been designed to improve the condition and functioning of freshwater environments within the Site, particularly the Mangaheka Stream and associated drainage network, which are highly modified and generally have low ecological function. The Project incorporates reconstruction and enhancement of the Mangaheka Stream corridor, riparian planting, constructed stormwater wetlands, fish passage measures, black mudfish habitat creation and other ecological restoration initiatives. These measures are intended to improve stream health, habitat quality, water quality and ecological function over time. While parts of the existing freshwater environment will be modified as a result of the Development, the Project includes a comprehensive package of restoration, enhancement and management measures intended to improve degraded freshwater environments and maintain the health and wellbeing of other freshwater ecosystems. Accordingly, the Project is considered to be consistent with Policy 5.
Policy 6: <i>There is no further loss of extent of natural inland wetlands, their values are protected, and their restoration is promoted.</i>	Ecological investigations have not identified any natural inland wetlands within the Project Area for the purposes of the NPS-FM. Areas of damp pasture and pooled water identified during ecological investigations are highly modified and do not meet the relevant definition of a natural inland wetland. Accordingly, the Project will not result in the loss of extent or values of any natural inland wetland and Policy 6 is not directly engaged by the Project.
Policy 7: <i>The loss of river extent and values is avoided to the extent practicable.</i>	The Project has sought to avoid the loss of river extent and values where practicable through retention and enhancement of the Mangaheka and Te Otamanui Streams. The Project will, however, result in the reclamation of approximately 212 m of Watercourse M13. Clause 3.24 permits river loss only where there is a functional need for the activity in that location and the effects are managed through the effects management hierarchy. The EclA has applied the effects management hierarchy to the loss of M13 and has undertaken an Environmental Compensation Ratio assessment. Approximately 217 m of additional stream length is required to address the loss of extent and values. The proposed Mangaheka Stream restoration will create approximately 435 m of additional stream length and approximately 870 m² of additional stream habitat, resulting in a net gain in stream extent and ecological value. The Project is therefore considered consistent with Policy 7 and clause 3.24.
Policy 8: <i>The significant values of outstanding water bodies are protected.</i>	No freshwater body within the Project Area is identified as an outstanding water body under the relevant planning instruments. Policy 8 is therefore not directly engaged.
Policy 9:	The Project affects freshwater habitat supporting indigenous fish, including habitat within the Mangaheka Stream and artificial drains used by black mudfish.



<i>The habitats of indigenous freshwater species are protected.</i>	The Project incorporates stream restoration, riparian planting, fish salvage and relocation, black mudfish habitat creation, replacement of existing culverts and provision for fish passage. Existing culverts are generally in poor condition and some are perched or otherwise restrict connectivity. Replacement culverts will be designed to provide for fish passage in accordance with the NES-F and relevant fish-passage guidance, resulting in an improvement in connectivity within the Site.
Policy 13: <i>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.</i>	The Project provides for ongoing monitoring of freshwater, stormwater and ecological outcomes through the proposed consent conditions and management plans. Monitoring will be used to confirm the performance of stream restoration, stormwater treatment, ecological mitigation and other freshwater-management measures, with adaptive responses where required. This approach is consistent with Policy 13.
Policy 15: <i>Communities are enabled to provide for their social, economic, and cultural well-being in a way that is consistent with this National Policy Statement.</i>	The Project will provide substantial social and economic benefits through additional industrial land capacity, employment and infrastructure investment. Those benefits are provided for only after addressing freshwater ecosystem health and the health needs of people through the Project's stormwater, ecological and freshwater-management framework. The Project is therefore considered consistent with Policy 15.

Overall, the Project is considered generally consistent with the Objective and relevant policies of the NPS-FM. Freshwater values have been a significant influence on the Project design, with the Mangaheka Stream corridor retained as a central element of the Masterplan and supported by an integrated stormwater, ecological restoration and habitat-enhancement framework.

The Project will nevertheless modify existing freshwater environments, including reclamation of approximately 212 m of Watercourse M13 and modification of parts of the wider drainage network. Those effects have been assessed and are proposed to be managed through the effects management hierarchy, including stream creation and enhancement, riparian restoration, fish salvage and relocation, black mudfish habitat creation and improved fish passage.

The Project also provides for integrated management of land use, stormwater, groundwater and downstream receiving environments across the Mangaheka, Te Rapa and Te Otamanui catchments. Climate-change effects have been incorporated into the stormwater and flood-management framework, and tangata whenua have been actively involved in freshwater matters through the TWWG, CIA and proposed Tangata Whenua Management Plan.

No natural inland wetlands or outstanding water bodies are affected by the Project. The proposed restoration and enhancement measures are expected to improve the condition and ecological functioning of degraded freshwater environments within the Site over time.

Accordingly, while the Project will result in some unavoidable modification of freshwater environments, it is considered to respond appropriately to the hierarchy of obligations in Te Mana o te Wai and to the relevant direction of the NPS-FM through integrated catchment management, water-quality treatment, restoration, habitat enhancement and fish-passage improvements.



National Policy Statement for Highly Productive Land 2022

NPS-HPL Objective/Policy assessment	
Obj/Pol Provision	Comments
Objective	
<i>Highly productive land is protected for use in land-based primary production, both now and for future generations.</i>	The Project will result in the permanent conversion of land that falls within the interim definition of highly productive land from land-based primary production to industrial use. Until an operative regional policy statement contains maps of highly productive land, clause 3.5(7) applies. It generally treats General Rural or Rural Production zoned LUC 1, 2 and 3 land as highly productive land, subject to specified exclusions. Following the December 2025 amendments, LUC 3 land that is subject to a resource consent application for subdivision, use or development for an activity other than rural lifestyle, lodged at or after the commencement date, is excluded from the interim definition. Accordingly, the principal NPS-HPL issue for the Project relates to affected LUC 1 and 2 land. The Project does not directly align with the Objective insofar as it permanently removes that land from land-based primary production. This is an acknowledged policy tension. The significance of that tension is, however, informed by the productive characteristics of the Site. An earlier agricultural assessment undertaken by AgFirst (to inform the Referral Application) identified the former project area as being predominantly LUC 2w2 but found that much of the Site comprises very poorly drained organic soils with significant wetness limitations. Those characteristics reduce the versatility of the land and constrain its suitability for higher-value horticultural and arable production. Pastoral farming was identified as the principal practicable productive use across much of the Site. The Project also responds to a demonstrated demand for additional industrial land in a location adjoining Hamilton's principal industrial node. The Economic Assessment identifies demand of approximately 17–25 ha per annum and concludes that the approximately 123 ha of net developable industrial land proposed at TKE represents approximately 7–11 years of future Hamilton industrial demand. Accordingly, while the Project gives rise to a clear tension with the Objective, that tension needs to be considered as part of the overall statutory assessment alongside the productive characteristics of the Site and the significant strategic, economic and urban-development benefits of the Project.
Policies	
Policy 1: <i>Highly productive land is recognised as a resource with finite characteristics and long-term values for land-based primary production.</i>	The Project recognises that highly productive land is a finite resource with long-term productive value and that its permanent conversion to industrial use represents a loss of that resource. The productive capacity of the affected land is nevertheless not uniform. AgFirst identified that much of the Site is characterised by very poorly drained organic soils with significant wetness limitations and reliance on artificial drainage. While classified predominantly as LUC 2, those limitations constrain the versatility of much of the land and its suitability for higher-value horticultural and arable production.



	The existing rural use and its economic contribution have also been considered. The Economic Assessment estimates the current dairy farming use across the Site to generate approximately \$2.2 million in annual farm revenue, contribute approximately \$1.0 million to GDP and support approximately six FTE jobs. The finite characteristics and long-term productive value of the affected land have therefore been recognised as part of the assessment. However, because the Project will permanently remove highly productive land from land-based primary production, it is not directly aligned with the protection direction in Policy 1.
Policy 2: <i>The identification and management of highly productive land is undertaken in an integrated way that considers the interactions with freshwater management and urban development.</i>	The Project has been developed through an integrated assessment of land productivity, urban-development demand, freshwater management, infrastructure and environmental effects. The Site's productive characteristics have been considered alongside the identified need for additional industrial development capacity within the Hamilton urban environment. The Economic Assessment identifies a long-term demand for industrial land, a spatial imbalance in remaining supply and a particular constraint in the north-west Hamilton / Te Rapa market. At the same time, the Masterplan integrates the proposed industrial land use with stormwater treatment, catchment-based flood management, stream reconstruction and restoration, constructed stormwater wetland establishment and black mudfish habitat creation, riparian planting and ecological enhancement. The Project therefore reflects the integrated consideration of highly productive land, freshwater management and urban development contemplated by Policy 2.
Policy 4: <i>The use of highly productive land for land-based primary production is prioritised and supported.</i>	The Project will permanently convert affected highly productive land from land-based primary production to industrial development and therefore does not align directly with the direction in Policy 4. The significance of that tension is informed by the actual productive characteristics of the Site. AgFirst identified significant drainage and wetness constraints across much of the Site and concluded that pastoral farming represents the principal practicable productive use across those areas, with limited opportunity for higher-value horticultural or arable production. The Project also occurs immediately adjoining the established Te Rapa industrial area and represents a consolidated extension of an existing urban employment node rather than dispersed development into an otherwise intact rural environment. The tension with Policy 4 is therefore acknowledged and forms part of the overall assessment of the Project.
Policy 5: <i>The urban rezoning of highly productive land is avoided, except as provided in the NPS-HPL.</i>	Policy 5 is not directly engaged because the Project does not involve the rezoning of the Site from General Rural to an urban zone. The Site will remain zoned General Rural under the WDP-OiP, with the proposed industrial subdivision, land use and associated activities authorised through the approvals sought under the FTAA. The urban rezoning pathway in clause 3.6 is therefore not relied upon for the Project. Policy 5 is nevertheless relevant context in demonstrating the wider protective direction of the NPS-HPL.
Policy 7: <i>The subdivision of highly productive land is avoided, except as provided in the NPS-HPL.</i>	Policy 7 is directly relevant because the Project includes subdivision of land that falls within the interim definition of highly productive land. Clause 3.8 requires subdivision of highly productive land to be avoided unless one of the specified circumstances applies, including where the proposed lots will retain the overall productive capacity of the land over the long term, subdivision is on specified Māori land, or subdivision is required for specified infrastructure with a functional or



	operational need. The clause also requires cumulative loss of productive capacity and reverse sensitivity effects to be avoided where possible or otherwise mitigated. The industrial subdivision proposed by TKE will not retain the productive capacity of the affected highly productive land. The Project therefore gives rise to a direct tension with Policy 7 and the direction in clause 3.8. Insofar as the subdivision creates lots for future industrial development, it will not retain the productive capacity of the affected highly productive land and does not fall within the exceptions in clause 3.8(1). That component of the Project therefore gives rise to a direct tension with Policy 7 and clause 3.8. Some subdivision required for specified infrastructure may fall separately within clause 3.8(1)(c) where the relevant functional or operational need test is met. That does not, however, alter the position in relation to the subdivision principally undertaken to enable industrial development. That tension is inseparable from the proposed industrial land use itself. The subdivision is the mechanism by which the comprehensively masterplanned industrial development will be implemented and is not proposed as rural lifestyle or fragmented rural subdivision. The Development Framework maintains industrial primacy across the Site and controls sensitive activities, while the perimeter landscape, stormwater and open-space framework assists in managing interfaces with adjoining rural land. The Project is therefore not anticipated to materially constrain the continued operation of surrounding primary production activities. The inconsistency with the protective direction of Policy 7 is nevertheless acknowledged and must be weighed as part of the overall statutory assessment.
Policy 8: <i>Highly productive land is protected from inappropriate use and development</i>	The Project will result in permanent industrial development on land that falls within the interim definition of highly productive land. Policy 8 is therefore directly relevant. Clause 3.9 identifies the circumstances in which use or development of highly productive land may be considered appropriate and requires territorial authorities to manage the loss of availability and productive capacity and reverse sensitivity effects associated with such development. The principal industrial land use does not fall within any of the activities identified in clause 3.9(2) as an appropriate use or development of highly productive land. It therefore gives rise to a clear tension with the protective direction of Policy 8 and clause 3.9. Some individual components of the Project may separately fall within clause 3.9(2), including works associated with specified infrastructure or the protection, restoration or enhancement of indigenous biodiversity. Those exceptions do not extend to the industrial development of the Site as a whole. In considering the significance of that tension, the characteristics and context of the Site are relevant. Much of the Site is affected by significant drainage and wetness limitations which reduce its productive versatility despite its predominantly LUC 2 classification. Earlier comparative agricultural work undertaken by AgFirst also identified potential alternative expansion areas west of Burbush and southwest of Horotiu as generally containing land of higher productive capacity, including better-drained soils, LUC 1 land, established commercial vegetable production and larger viable dairy operations.



	The Site is also immediately adjacent to the established Te Rapa industrial area and key strategic transport infrastructure. The Economic Assessment identifies it as functionally part of the Hamilton industrial market and a logical extension of Te Rapa. It identifies approximately 17–25 ha per annum of industrial land demand and concludes that TKE will make a material contribution to addressing the identified long-term supply constraint, particularly in north-west Hamilton. The locational relationship between the identified industrial land demand and the Site is also important. The Economic Assessment identifies the north-west Hamilton / Te Rapa area as a distinct part of the industrial market, with comparatively constrained remaining supply and significant existing and projected employment and population growth. The benefits associated with the Project therefore arise not simply from the conversion of rural land to a higher-value use, but from providing additional industrial capacity in a location that is functionally integrated with Hamilton's principal industrial node and strategic transport network. The Project therefore has strong strategic and economic reasons for locating on the Site. Those matters do not remove the inconsistency with the protective direction of Policy 8. They are, however, relevant to the wider statutory assessment under the FTAA, including the weight to be given to the Project's regional benefits relative to the adverse consequence of permanently removing highly productive land from primary production. The scale of the resulting loss of highly productive land, including its cumulative effect on the availability and productive capacity of highly productive land within the district, is also relevant to the assessment.
Policy 9: <i>Reverse sensitivity effects are managed so as not to constrain land-based primary production activities on highly productive land.</i>	The Project has been designed to minimise the potential for reverse sensitivity effects on surrounding rural and primary production activities. The development is predominantly industrial and the Development Framework maintains industrial primacy across the Site. Sensitive activities are either excluded or specifically limited and controlled so that they do not establish a significant sensitive population at the interface with adjoining rural activities. The Masterplan also incorporates landscape, stormwater and open-space treatments around much of the Site perimeter, providing physical separation between industrial development and adjoining rural properties. Accordingly, the Project is unlikely to constrain the continued lawful operation of land-based primary production on surrounding land and is considered consistent with Policy 9.

Overall, the Project will result in the permanent subdivision, use and development of highly productive land for industrial purposes and therefore gives rise to a clear tension with the Objective and Policies 1, 4, 7 and 8 of the NPS-HPL. While some individual infrastructure and ecological components may fall within the exceptions provided by clauses 3.8 and 3.9, the subdivision and development of the Site for industrial purposes does not.

The productive characteristics of the Site, including the significant drainage and wetness constraints identified by AgFirst, are relevant to understanding the significance of the loss of productive land. However, those characteristics do not of themselves establish the exemption in clause 3.10. That clause requires a demonstration that permanent or long-term constraints mean land-based primary production is not able to be economically viable for at least 30 years, that those constraints cannot be addressed through reasonably practicable options that would retain productive capacity, and that the other requirements of clause 3.10 are satisfied.



Accordingly, unless the exemption in clause 3.10 is relied upon and supported by current expert evidence, the Project should be recognised as not fully consistent with the protective direction of the NPS-HPL. That inconsistency is an adverse consideration that must be weighed within the wider FTAA statutory assessment. In that context, the significance of the Project's regional benefits, the demonstrated need for additional industrial development capacity, and the strong functional relationship between that demand and the Site's location adjoining Te Rapa are particularly relevant.



National Policy Statement on Indigenous Biodiversity

NPS-IB Objective/Policy assessment	
Obj/Pol Provision	Comments
Objective	
<i>The objective of this National Policy Statement is:</i> (a) <i>To maintain indigenous biodiversity across Aotearoa New Zealand so that there is at least no overall loss in indigenous biodiversity after the commencement dates; and</i> (b) <i>To achieve this:</i> (i) <i>Through recognising the mana of tangata whenua as kaitiaki of indigenous biodiversity; and</i> (ii) <i>By recognising people and communities, including landowners, as stewards of indigenous biodiversity and</i> (iii) <i>By protecting and restoring indigenous biodiversity as necessary to achieve the overall maintenance of indigenous biodiversity; and</i> (iv) <i>While providing for the social, economic, and cultural wellbeing of people and communities now and in the future.</i>	The Project is located within a highly modified rural environment dominated by pasture, cropping, exotic shelterbelts, hedgerows and other exotic vegetation. The EclA identifies generally low terrestrial ecological values across much of the Site and does not identify any SNA within the Project Area. The Project will nevertheless result in the modification and removal of vegetation and potential habitat for indigenous fauna. Those effects have been assessed through the EclA and have informed the design of the Project and the ecological management measures proposed. The Project incorporates restoration and enhancement measures including indigenous riparian planting, restoration of the Mangaheka Stream corridor, habitat enhancement and establishment of additional indigenous vegetation within the Development. These measures are intended to improve habitat quality, ecological connectivity and indigenous biodiversity values within a landscape that is currently substantially modified. The Project also recognises the mana of tangata whenua as kaitiaki through engagement undertaken through the TWWG and CIA process and through ongoing opportunities for mana whenua involvement in ecological restoration and environmental management. Long-tailed bats are also specifically relevant to the assessment. Although no bats were detected during Project-specific surveys, the Site contains some trees with potential roost features and linear vegetation that may provide potential commuting or foraging habitat. Specific management measures are proposed to address those potential effects. Overall, while the Project will result in some adverse effects on existing biodiversity values, those effects are proposed to be managed and accompanied by substantial restoration and enhancement measures. The Project is therefore considered generally consistent with the Objective of the NPS-IB.
Policies	
Policy 1: <i>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.</i>	The Project has been informed by the decision-making principles of the NPS-IB, including recognition of the role of tangata whenua as kaitiaki and the need to maintain indigenous biodiversity while enabling people and communities to provide for their wellbeing. Tangata whenua have been involved through the TWWG, project hui and preparation of the CIA. The EclA has identified indigenous biodiversity values within the Project Area and informed measures to avoid and minimise adverse effects where practicable and to restore and enhance biodiversity values. The Project therefore provides an integrated response to ecological and cultural values and is considered generally consistent with Policy 1.
Policy 2:	Tangata whenua have been actively involved in development of the Project through the TWWG, project hui and preparation of the CIA. Biodiversity, freshwater, ecological restoration and cultural values have formed part of that engagement.



<i>Tangata whenua exercise kaitiakitanga for indigenous biodiversity in their rohe, including through:</i> <i>(a) Managing indigenous biodiversity on their land; and</i> <i>(b) Identifying and protecting indigenous species, populations and ecosystems that are taonga; and</i> <i>(c) Actively participating in other decision-making about indigenous biodiversity.</i>	The Project provides for ongoing mana whenua involvement through the proposed Mana Whenua Management Plan, including involvement in ecological restoration and enhancement, cultural protocols and environmental management during implementation of the Project. These measures recognise and provide for the exercise of kaitiakitanga and ongoing participation in decisions affecting indigenous biodiversity. The Project is therefore considered generally consistent with Policy 2.
Policy 3: <i>A precautionary approach is adopted when considering adverse effects on indigenous biodiversity.</i>	The Project has adopted a precautionary approach where uncertainty remains regarding the presence or use of habitat by indigenous fauna. Detailed ecological investigations have been undertaken across the Site, including surveys for vegetation, indigenous birds, lizards and long-tailed bats. Where those investigations have not conclusively excluded the presence or future use of habitat, management measures are nevertheless proposed. In particular, no lizards were identified during manual habitat searches, but suitable habitat remains present and the possibility of copper skink occurring within the Site has not been excluded. The separate Wildlife Approval and Lizard Management Plan therefore provide for precautionary management of vegetation and habitat clearance. Similarly, no long-tailed bats were detected during Project-specific acoustic surveys, but potential roost trees and possible commuting and foraging habitat have been identified. A Bat Management Plan and DOC Bat Roost Tree Protocols are proposed to manage the residual risk associated with vegetation clearance. The Project therefore adopts a precautionary approach to identified ecological uncertainty and is considered consistent with Policy 3.
Policy 4: <i>Indigenous biodiversity is managed to promote resilience to the effects of climate change.</i>	The Project incorporates measures that will improve the resilience of indigenous biodiversity within the Site over time, including increased indigenous vegetation cover, restoration and enhancement of the Mangaheka Stream corridor, riparian planting and improved ecological connectivity. The proposed green network will establish larger and more connected areas of habitat than are presently available across the highly modified pastoral landscape. Increased vegetation cover and improved connectivity will assist indigenous flora and fauna to respond to changing environmental conditions. The Project's stormwater and flood-management framework also incorporates climate-change-adjusted design and supports the long-term functioning of the ecological and open-space network. Accordingly, the Project is considered consistent with Policy 4.
Policy 5: <i>Indigenous biodiversity is managed in an integrated way, within and across administrative boundaries.</i>	The Project has been developed through an integrated approach to land use, ecology, landscape, freshwater, stormwater and infrastructure planning. Ecological restoration and habitat enhancement are integrated with the Mangaheka Stream corridor, stormwater network, open-space system and landscape framework rather than being treated as isolated mitigation measures. This provides opportunities to improve ecological connectivity within the Site and its relationship with habitats beyond the Site.



	The Project has also been developed through engagement with WDC, HCC, WRC, mana whenua and other relevant parties, recognising that ecological systems and fauna movement are not confined by administrative boundaries. Accordingly, the Project is considered generally consistent with Policy 5.
Policy 8: <i>The importance of maintaining indigenous biodiversity outside SNAs is recognised and provided for.</i>	No SNA has been identified within the Project Area. However, the Project recognises that indigenous biodiversity outside SNAs remains important and has assessed terrestrial vegetation and potential habitat for indigenous birds, lizards and long-tailed bats accordingly. The Site is predominantly highly modified and terrestrial habitat values are generally low. Nevertheless, some vegetation provides potential fauna habitat, including mature trees with potential bat-roost features, shelterbelts and hedgerows that may provide movement or foraging habitat, and areas potentially suitable for indigenous lizards. Effects on those values are proposed to be managed through vegetation-clearance protocols, fauna-specific management measures, the Lizard Management Plan, Bat Management Plan and ecological restoration and planting. The Project will also establish substantial new indigenous vegetation and improve habitat connectivity through the Mangaheka Stream corridor and wider green network. Accordingly, the Project recognises and provides for the maintenance of indigenous biodiversity outside SNAs and is considered generally consistent with Policy 8.
Policy 10: <i>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.</i>	The Project will provide substantial social and economic benefits through the provision of additional industrial land, employment and investment and support for Hamilton's longer-term growth. Those benefits are accompanied by measures to manage the Project's effects on indigenous biodiversity in accordance with the NPS-IB. The Site is a predominantly modified production landscape and the Project incorporates vegetation-clearance controls, fauna-management measures, ecological restoration, indigenous planting and habitat enhancement. The Project also provides environmental benefits through restoration of the Mangaheka Stream corridor, increased indigenous vegetation cover and improved ecological connectivity, while cultural wellbeing is recognised through mana whenua involvement and the CIA process. Accordingly, the Project provides for social, economic, cultural and environmental wellbeing within the biodiversity-management framework established by the NPS-IB and is considered consistent with Policy 10.
Policy 13: <i>Restoration of indigenous biodiversity is promoted and provided for.</i>	The Project provides significant opportunities for restoration of indigenous biodiversity within a landscape that currently contains limited and fragmented indigenous terrestrial vegetation. The Project includes restoration and enhancement of the Mangaheka Stream corridor, extensive indigenous riparian planting, habitat enhancement and establishment of additional indigenous vegetation within the green and open-space network. Those measures will improve habitat quality, ecological connectivity and ecosystem function over time and will establish indigenous vegetation within areas currently dominated by pasture, cropping and exotic vegetation. Freshwater restoration measures will also contribute to wider biodiversity outcomes, although the effects on rivers, aquatic habitat and freshwater species are principally assessed under the NPS-FM. The Project therefore actively promotes and provides for restoration of indigenous biodiversity and is considered consistent with Policy 13.
Policy 14:	The Project will substantially increase indigenous vegetation cover across the Site through riparian restoration, planting of the Mangaheka Stream corridor, habitat enhancement areas and wider indigenous landscape planting.



<i>Increased indigenous vegetation cover is promoted in both urban and non urban environments.</i>	While some existing vegetation will be removed to enable development, much of the affected vegetation is exotic or occurs within highly modified habitats. The proposed planting programme will establish substantial areas of indigenous vegetation within areas presently dominated by pasture, cropping and exotic vegetation. The planting will also improve ecological connectivity and provide additional habitat for indigenous fauna as it establishes. Clause 3.22 of the NPS-IB requires regional councils to assess indigenous vegetation cover within urban and non-urban environments and to set a target of at least 10% indigenous vegetation cover where existing cover is below that level. It also requires local authorities to promote increased indigenous vegetation cover through their planning frameworks. This is a broader strategic obligation rather than a site-specific requirement for the Project. However, the substantial indigenous planting proposed as part of TKE will contribute positively to that direction and is also consistent with wider local biodiversity initiatives, including Hamilton City Council's Nature in the City programme. Accordingly, the Project is considered consistent with Policy 14.
Policy 15: <i>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.</i>	Long-tailed bat (<i>Chalinolobus tuberculatus</i>) is a specified highly mobile fauna species and is classified as Threatened – Nationally Critical. Long-tailed bats are known from the wider Hamilton landscape and the EclA specifically assessed the potential for the Project Area to provide habitat for the species. Project-specific surveys involved deployment of 21 automatic bat monitors across the Project Area for 28 nights between 17 December 2025 and 14 January 2026. No long-tailed bats were detected. The EclA also refers to predictive modelling which indicates a low probability of bat activity within the Project Area, reflecting the fragmented vegetation pattern and dominance of high-producing exotic grassland. Notwithstanding the absence of recorded activity, the Site contains habitat features that could potentially be used by long-tailed bats, including mature trees with potential roost features, shelterbelts and hedgerows that may provide linear commuting habitat, and open and aquatic areas that may provide foraging opportunities. The EclA assigns bats and bat habitat an overall Moderate ecological value. While habitat quality and ecological context are relatively low, the conservation status of long-tailed bats substantially increases their ecological value. The principal potential effect arises from the removal of trees containing suitable roost features. Although no bats were detected, those trees could potentially be occupied in the future. The EclA therefore recommends a Bat Management Plan and implementation of the DOC Bat Roost Tree Protocols, including appropriate assessment and ecologist input before removal of potential roost trees. The Project will also alter some existing potential commuting and foraging habitat. However, the proposed restoration of the Mangaheka Stream corridor, indigenous planting and constructed wetland network will establish and improve potential movement and foraging habitat over time. On that basis, the Project has appropriately identified and assessed areas outside SNAs that may support long-tailed bats and provides specific measures to manage potential effects. The Project is therefore considered generally consistent with Policy 15.
Policy 17: <i>There is improved information and regular monitoring of indigenous biodiversity.</i>	The Project is supported by detailed ecological investigations that have improved the information available regarding terrestrial and freshwater biodiversity values within the Site. These investigations include vegetation and habitat mapping and surveys for indigenous birds, lizards, bats and freshwater fauna.



	Further information will be obtained through the ecological management measures proposed for the Project. These include fauna-specific survey and management requirements associated with vegetation clearance, together with monitoring of ecological restoration, planting and habitat enhancement. In particular, the Bat Management Plan and Bat Roost Tree Protocols provide for additional investigation where potential roost habitat is affected, while the Lizard Management Plan includes survey, salvage and monitoring requirements relevant to potential lizard habitat. Monitoring of restoration and habitat establishment will also provide information on the effectiveness of the ecological measures implemented as part of the Project. Accordingly, the Project supports improved ecological information and ongoing monitoring and is considered consistent with Policy 17.
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Overall, the Project is considered generally consistent with the Objective and relevant policies of the NPS-IB. The Site is a highly modified rural environment and no SNA has been identified within the Site. The Project will nevertheless affect some vegetation and potential habitat for indigenous fauna, including potential long-tailed bat roosting, commuting and foraging habitat and potential lizard habitat.

Those effects have been assessed and are proposed to be managed through Project design, vegetation-clearance controls, fauna-specific management measures and conditions. The precautionary approach adopted for lizards and long-tailed bats appropriately responds to the residual uncertainty regarding use of the Site by those species.

The Project will also provide substantial positive biodiversity outcomes through restoration of the Mangaheka Stream corridor, increased indigenous vegetation cover, habitat enhancement and improved ecological connectivity across the Site. Tangata whenua involvement in the identification and implementation of ecological outcomes further supports the direction of the NPS-IB.

Accordingly, the Project is considered to maintain indigenous biodiversity while providing for the social, economic and cultural wellbeing contemplated by the NPS-IB.



National Policy Statement for Natural Hazards 2025

NPS-NH Objective/Policy assessment	
Obj/Pol Provision	Comments
Objective	
<i>Natural hazard risk to people and property associated with subdivision use and development is managed using a risk-based proportionate approach.</i>	Natural hazard risk associated with the Project has been assessed through the Geotechnical Investigation Report, hydraulic modelling, Stormwater Management Plan, Hydrogeological Effects Assessment and supporting infrastructure assessments. These investigations have informed the Masterplan, earthworks strategy, finished ground levels, stormwater and flood management system and geotechnical design requirements. The natural hazards of principal relevance to the Project are flooding, liquefaction and landslip / slope instability. The GIR also considers related geotechnical hazards including lateral spreading, settlement, bearing capacity, cut and fill batter instability and dewatering effects. CMW has undertaken a specific natural hazard risk assessment using the likelihood, consequence and risk matrix derived from Appendix 1 of the NPS-NH. The assessment considers both latent risk associated with the developed Site and residual risk following implementation of the proposed geotechnical controls. The Project also incorporates a comprehensive flood-management response, including attenuation wetlands, conveyance channels, overland flow paths, reconstruction of the Mangaheka Stream corridor and finished development levels that locate industrial development outside the principal flood conveyance areas. Hydraulic modelling has assessed existing and post-development flood behaviour for the 2-, 10- and 100-year ARI events. The Project therefore adopts the risk-based and proportionate approach required by the NPS-NH and is considered consistent with the Objective.
Policies	
Policy 1: <i>When considering natural hazard risk associated with subdivision, use or development, the risk level must be assessed using the risk matrix.</i>	The GIR includes a specific natural hazard risk assessment for the proposed subdivision and development using the likelihood, consequence and risk matrix derived from Appendix 1 of the NPS-NH. The assessment identifies both the latent risk and the residual risk following implementation of the proposed geotechnical controls. The assessment identifies, among other matters, liquefaction and lateral spreading as Medium latent risks that reduce to Low residual risk, and cut and fill batter instability and bearing-capacity failure as High latent risks that reduce to Low residual risk following the proposed engineering controls. Landslip / global slope instability remains a Medium residual risk following mitigation. Flood risk has also been assessed through detailed hydraulic modelling of the existing and post-development conditions, including flood extent, depth, velocity, overland flow behaviour and downstream effects. Accordingly, the relevant natural hazard risks have been identified and assessed using the NPS-NH risk framework and the Project is considered consistent with Policy 1.



Policy 2: <i>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.</i>	The Project responds to the assessed level of natural hazard risk through a combination of site layout, earthworks, stormwater and flood management, geotechnical controls and future detailed-design requirements. The CMW risk assessment identifies no Very High residual geotechnical risk. A number of hazards reduce to Low residual risk following the proposed controls, including liquefaction, lateral spreading, cut and fill batter instability and bearing-capacity failure. Landslip / global slope instability and some groundwater-related effects remain Medium residual risks and are proposed to be managed through further geotechnical design, slope stability controls, groundwater management and construction monitoring. Flood risk is addressed through eight attenuation wetlands, dedicated conveyance corridors, overland flow paths, modifications to the Mangaheka Stream corridor and finished platform levels. The stormwater system is designed to safely convey major flood events and attenuate post-development peak flows to or below the relevant pre-development rates. The scale and nature of these measures reflects the level of natural hazard risk identified within the Project Area. Accordingly, the Project is considered consistent with Policy 2.
Policy 3: <i>Subdivision, use and development must avoid very high natural hazard risk.</i>	The natural hazard assessments do not identify any Very High residual natural hazard risk associated with the proposed development. The GIR identifies several latent Medium or High geotechnical risks, but those risks are reduced through the proposed engineering controls. Following mitigation, the assessed residual geotechnical risks are Low or Medium. Flood modelling similarly informs the proposed development layout and stormwater system so that future industrial development is located outside the principal flood conveyance areas and flood flows are safely managed through the public road, stormwater and Mangaheka Stream corridors. Accordingly, the Project does not create or expose people or property to Very High natural hazard risk and is considered consistent with Policy 3.
Policy 4: <i>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.</i>	The Project has been specifically designed to avoid creating or increasing significant flood risk on adjoining and downstream land. Te Miro Water has undertaken integrated hydraulic modelling of the Site and downstream receiving environment for existing and post-development conditions. The modelling assesses peak flows, water levels, flood extent, velocities, drainage performance and overland flow behaviour at key locations within the Mangaheka and Te Rapa catchments. The proposed attenuation wetlands mitigate post-development peak flows from the Site to or below pre-development levels for the 2-, 10- and 100-year ARI events. The Mangaheka Stream works and attenuation structures also manage the interaction between improved on-site conveyance and downstream flows. The stormwater framework further requires no increase in flood risk, flood levels or ponding duration upstream or downstream of the Development and seeks to maintain the performance of the WRC-administered drainage network. Geotechnical controls also address the potential for cross-boundary effects associated with slope instability, settlement, groundwater drawdown and lateral spreading. Accordingly, the Project is designed so that significant natural hazard risk is not created or increased on other sites and is considered consistent with Policy 4.



Policy 5: <i>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.</i>	The natural hazard assessment is based on a substantial body of site-specific information, including geotechnical investigations, boreholes and cone penetration testing, groundwater monitoring, liquefaction and slope-stability analysis, detailed hydraulic modelling, flood mapping and hydrogeological assessment. The hydraulic model has been developed using site and catchment topography, surveyed hydraulic structures, NIWA HIRDS rainfall, mapped land use and soil conditions and the proposed development landform and stormwater infrastructure. The model has also undergone independent peer review. The hydrogeological assessment is supported by site-specific groundwater monitoring and hydraulic testing and assesses both construction and long-term groundwater effects associated with the stormwater and wastewater systems. Where uncertainty remains, the technical assessments identify appropriate further investigation, monitoring and detailed design requirements. This includes site-specific geotechnical design for future buildings and structures, settlement monitoring, slope and retaining-wall design, groundwater management and confirmation of detailed stormwater infrastructure. Those matters are typical of detailed design and do not prevent a decision being made on the suitability of the Project or the level of natural hazard risk on the basis of the information presently available. Accordingly, the Project is considered consistent with Policy 5.
Policy 6: <i>The potential impacts of climate change to at least 100 years into the future must be considered.</i>	Climate change has been expressly incorporated into the Project's stormwater and flood assessment. The SWMP and hydraulic modelling adopt NIWA HIRDS rainfall adjusted using the SSP5-8.5 climate-change scenario, based on an assumed 4°C increase in temperature by the end of the 21st century. Climate-adjusted rainfall depths are used for post-development stormwater design and assessment of the 2-, 10- and 100-year ARI events. The stormwater management system, including wetlands, conveyance infrastructure, overland flow paths and the Mangaheka Stream corridor, has therefore been designed and assessed having regard to the increased rainfall intensity and flood risk anticipated as a result of climate change. This provides for the long-term resilience and performance of the Development and is considered consistent with Policy 6.

Overall, the Project is considered consistent with the Objective and relevant policies of the NPS-NH. Natural hazard risks have been identified and assessed using the NPS-NH risk framework and a comprehensive suite of geotechnical, hydraulic and hydrogeological investigations.

The assessment identifies no Very High residual natural hazard risk. Where Medium or High latent risks are identified, the Project incorporates design and engineering controls proportionate to those risks, with residual risks generally reduced to Low or Medium levels. Remaining detailed-design requirements do not represent unresolved feasibility constraints and will be addressed through the relevant engineering, management-plan and building-consent processes.

Flood risk has been incorporated into the Masterplan and stormwater design, with the Project designed to avoid increasing significant natural hazard risk on adjoining and downstream sites. Climate change has also been expressly incorporated into the hydraulic assessment and infrastructure design.

Accordingly, the Project is considered to manage natural hazard risk using the risk-based and proportionate approach required by the NPS-NHL



WRPS Objective/Policy assessment	
Obj/Pol Provision	Comments
Integrated management – Objectives	
IM-01 – Integrated management <i>Natural and physical resources are managed in a way that recognises:</i> <i>the inter-relationships within and values of water body catchments, riparian areas and wetlands, the coastal environment, the Hauraki Gulf and the Waikato River;</i> <i>natural processes that inherently occur without human management or interference;</i> <i>the complex interactions between air, water, land and all living things;</i> <i>the needs of current and future generations;</i> <i>the relationships between environmental, social, economic and cultural wellbeing;</i> <i>the need to work with agencies, landowners, resource users and communities; and</i> <i>the interrelationship of natural resources with the built environment.</i>	The Project adopts an integrated approach to land use, freshwater, groundwater, stormwater, flooding, ecology, infrastructure and cultural values. The stormwater framework has been developed at a catchment scale across the Mangaheka, Te Rapa and Te Otamanui catchments and considers downstream receiving environments. Ecological restoration, flood management, infrastructure and cultural outcomes have also been incorporated into the development outcomes rather than addressed independently. The Project has been developed through engagement with relevant local authorities, infrastructure providers, tangata whenua, adjoining landowners and other stakeholders, recognising that the environmental and infrastructure systems affected by the Project extend beyond the Site. The Project is therefore considered consistent with the integrated-management direction of Objective IM-01.
IM-02 – Resource use and development <i>Recognise and provide for the rule 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:</i> <i>access to natural and physical resources to provide for regionally significant industry and primary production activities that support such industry;</i> <i>the life supporting capacity of soils, water and ecosystems to support primary production activities;</i>	The Project will provide approximately 123 ha of net developable industrial land immediately adjoining the established Te Rapa industrial area. The Economic Assessment identifies industrial land demand in Hamilton at approximately 17–25 ha per annum and concludes that the Project represents approximately 7–11 years of future industrial land demand. The Project will therefore provide substantial economic and development benefits through additional business land capacity, employment, infrastructure investment and improved spatial distribution of industrial land within north-west Hamilton. Those benefits are provided within an integrated framework addressing transport, three-waters infrastructure, freshwater, ecological restoration, natural hazards and cultural values. Accordingly, the Project is considered consistent with Objective IM-02.



3. <i>the availability of energy resources for electricity generation and for electricity generation activities to locate where the energy resource exists;</i> 4. <i>access to the significant mineral resources of the region; and</i> 5. <i>the availability of water for municipal and domestic supply to people and communities.</i>	
IM-03 – Decision making <i>Resource management decision making is holistic and consistent and:</i> 1. <i>is aligned across legislation and national and regional strategies;</i> 2. <i>takes an integrated approach to managing resources that cross regional and functional boundaries;</i> 3. <i>adopts an appropriate planning timeframe;</i> 4. <i>adopts a precautionary approach, including the use of adaptive management, where appropriate, towards any proposed activity whose effects may be significant or irreversible but are as yet uncertain, unknown or little understood;</i> 5. <i>is transparent;</i> 6. <i>has regard to the potential for cumulative effects from activities;</i> 7. <i>is based on the best available information, including mātauranga Māori;</i> 8. <i>allows for flexible solutions for local variations;</i> 9. <i>recognises that time may be needed for change to occur;</i> 10. <i>includes working with tangata whenua;</i> 11. <i>includes working with key stakeholders;</i> 12. <i>considers a mix of methods to achieve objectives; and</i> 13. <i>results in solutions which include processes to minimise conflicts.</i>	The Project has been informed by a substantial body of site-specific technical information, including transport assessment, hydraulic modelling, ecological investigations, geotechnical and hydrogeological assessment, landscape and visual assessment, infrastructure design and the CIA. The Project has also been developed through engagement with WDC, HCC, WRC, IAWAI, NZTA, tangata whenua and other relevant stakeholders. That engagement has informed the development outcome, infrastructure staging, consent conditions and management plans. Potential cumulative effects have been considered, including catchment-wide stormwater and flooding effects, freshwater effects, infrastructure capacity and the relationship of the Project with existing and planned urban development. Where detailed design or residual uncertainty remains, this is addressed through conditions, monitoring, management plans and adaptive responses. Those matters do not prevent the effects and suitability of the Project being assessed on the information presently available. The Project therefore responds appropriately to the holistic, precautionary and evidence-based decision-making direction of Objective IM-03.
IM-04 – Health and wellbeing of the Waikato River <i>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 of the Waikato River) is achieved.</i>	The Project lies within the wider Waikato River catchment and will modify parts of the existing freshwater environment. It nevertheless incorporates a significant programme of stormwater treatment, stream restoration, riparian enhancement, habitat creation and fish-passage improvement. Importantly, the Project does not rely on the existing degraded condition of the Mangaheka Stream and associated drainage network as justification for further degradation. Rather, the freshwater and stormwater framework seeks to improve the health, ecological function and resilience of those environments over time.



	The Project has also been developed through active engagement with tangata whenua and provides for ongoing mana whenua involvement during implementation. The Project is therefore considered generally consistent with Objective IM-O4 and the direction of Te Ture Whaimana.
IM-O5 – Climate Change <i>Land use is managed to:</i> 1. <i>avoid the potential adverse effects of climate change induced weather variability and sea level rise on:</i> a. <i>amenity</i> b. <i>the built environment, including infrastructure</i> c. <i>indigenous biodiversity</i> d. <i>natural character</i> e. <i>public health and safety and</i> f. <i>public access</i> 2. <i>Support reductions in greenhouse gas emissions within urban environments and ensure urban environments are resilient to the current and future effects of climate change.</i>	Climate change has been expressly incorporated into the Project's stormwater, flood-management and infrastructure framework. Climate-adjusted rainfall has been adopted for the design and assessment of the stormwater network, attenuation wetlands, overland flow paths and flood-management system. The Project also incorporates restoration of the Mangaheka Stream corridor, riparian planting and ecological enhancement measures that support the resilience of freshwater and biodiversity values. Accordingly, the Project is considered consistent with Objective IM-O5.
IM-O6 – Ecosystem services <i>The range of ecosystem services associated with natural resources are recognised and maintained or enhanced to enable their ongoing contribution to regional wellbeing.</i>	The Project recognises the ecosystem services provided by freshwater systems, riparian vegetation, constructed stormwater wetlands and indigenous habitat and incorporates those functions into the development outcome. The Mangaheka Stream corridor and stormwater network are designed to provide multiple outcomes, including stormwater treatment, flood attenuation and conveyance, freshwater habitat, ecological connectivity, riparian restoration, amenity and cultural benefits. The Project will modify parts of the existing environment but will also substantially increase indigenous riparian vegetation, restore and enhance stream habitat and create additional freshwater habitat. These measures maintain and enhance ecosystem services within the Site and contribute to wider catchment wellbeing. The Project is therefore considered generally consistent with Objective IM-O6.
IM-O7 – Relationship of tangata whenua with the environment <i>The relationship of tangata whenua with the environment is recognised and provided for, including:</i> 1. <i>The use and enjoyment of natural and physical resources in accordance with tikanga Māori, including mātauranga Māori; and</i> 2. <i>The role on tangata whenua as kaitiaki</i>	Tangata whenua have been actively involved in development of the Project through the TWWG, hui, technical engagement and preparation of the CIA. Freshwater, ecological restoration, cultural values and the Mangaheka Stream have been central matters in that engagement. The proposed Mana Whenua Management Plan will provide for ongoing mana whenua involvement during implementation, including cultural monitoring, cultural protocols and input into ecological restoration and environmental management.



	The Project therefore recognises and provides for the relationship of tangata whenua with the environment and opportunities for the exercise of kaitiakitanga, consistent with Objective IM-07.
IM-08 – Sustainable and efficient use of resources <i>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.</i>	The Project has been comprehensively masterplanned to enable efficient use of land and infrastructure and to coordinate development with the transport, three-waters and utility networks required to service it. The Site immediately adjoins the established Te Rapa industrial area and strategic transport network, allowing future industrial development to make use of and integrate with existing and planned infrastructure rather than establishing an isolated employment area. The earthworks strategy seeks to balance cut and fill within the Site so far as practicable, reducing the need for significant off-site import or disposal of material. Infrastructure is also staged to align with development demand and network capacity. The Project therefore promotes the efficient use of land, material and infrastructure resources and is considered generally consistent with Objective IM-08.
IM-09 – Amenity 1. <i>The qualities and characteristics of areas and features, valued for their contribution to amenity, are maintained or enhanced; and</i> 2. <i>Where intensification occurs in urban environment, built development results in attractive, healthy, safe and high-quality urban form which response 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.</i>	The Project will result in substantial change to the existing rural character and amenity of the Site through its development as a large-scale industrial area. That change occurs in a locality that is already transitioning, with the established Te Rapa industrial area immediately adjoining the Site and further urban and industrial growth occurring across north-west Hamilton. The Project has been masterplanned to manage the interface with surrounding land through landscape buffers, stormwater and ecological corridors, setbacks, streetscape treatment and development controls. While existing amenity values will change, the resulting industrial environment has been designed to achieve an appropriate level of amenity for its intended use and context. The Project is therefore considered generally consistent with Objective IM-09.
IM-010 – Public access <i>Public access to and along the coastal marine area, lakes and rivers is maintained and enhanced.</i>	The Project does not affect existing public access to the Waikato River or other major public freshwater environments. The development outcome will, however, provide an integrated open-space, walking and cycling network associated with the Mangaheka Stream corridor, improving public access to and appreciation of the restored freshwater environment within the Site. The Project is therefore considered generally consistent with Objective IM-010.
Integrated management – Policies	
IM-P1 – Integrated approach <i>An integrated approach to resource management will be adopted that:</i> 1. <i>recognises the inter-connected nature of natural and physical resources (including spatially and temporally) and the benefits of</i>	The Project adopts an integrated approach to subdivision, industrial land use, transport, three-waters infrastructure, freshwater, ecology, natural hazards, landscape and cultural values.



<i>aligning the decisions of relevant management agencies across boundaries;</i> <i>2. maximises the benefits and efficiencies of working together;</i> <i>3. recognises the multiple values of natural and physical resources including ecosystem services;</i> <i>4. responds to the nature and values of the resource and the diversity of effects (including cumulative effects) that can occur;</i> <i>5. maximises opportunities to achieve multiple objectives;</i> <i>6. takes a long-term strategic approach which recognises the changing environment and changing resource use pressures and trends;</i> <i>7. applies consistent and best practice standards and processes to decision making; and</i> <i>8. establishes, where appropriate, a planning framework which sets clear limits and thresholds for resource use.</i>	The Project has been planned over the long term and recognises the interconnected nature of the Site, the Mangaheka, Te Rapa and Te Otamanui catchments, downstream receiving environments and the wider Hamilton urban and infrastructure network. The development outcome, infrastructure staging, consent conditions and management plans provide a coordinated framework for managing environmental effects while enabling the social and economic benefits of the Project. The approach also provides opportunities to achieve multiple outcomes through the same infrastructure and environmental network, particularly through the Mangaheka Stream corridor, stormwater wetlands, riparian planting and open-space system. The Project is therefore considered consistent with Policy IM-P1.
IM-P2 – Collaborative approach <i>Waikato Regional Council will:</i> <i>1. recognise and provide for the unique role that territorial authorities have in the implementation of the provisions of the Waikato Regional Policy Statement; and</i> <i>2. encourage collaboration, participation and information sharing between resource management agencies, tangata whenua and relevant stakeholders, particularly where there are shared or overlapping responsibilities or functions for issues or resources, and including when resources or issues cross boundaries.</i>	The Project has been developed through an extensive programme of engagement with WDC, HCC, WRC, IAWAI, NZTA, tangata whenua, network utility providers, adjoining landowners and other relevant stakeholders. The Project also requires coordination across local-authority and infrastructure boundaries, particularly in relation to transport, wastewater, water supply, stormwater and the wider freshwater catchment. The Project therefore reflects the collaborative and coordinated approach sought by Policy IM-P2.
IM-P3 – Tangata whenua <i>Tangata whenua are provided appropriate opportunities to express, maintain and enhance the relationship with their rohe through resource management and other local authority processes.</i>	Tangata whenua have been provided ongoing opportunities to participate in development of the Project through the TWWG, hui, technical engagement, site visits and preparation of the CIA. That engagement has informed the consideration of freshwater values, ecological restoration, cultural values, the Mangaheka Stream, stormwater management and the management of indigenous species. The proposed Mana Whenua Management Plan will provide for continuing involvement during implementation of the Project. The Project is therefore considered consistent with Policy IM-P3.



Land and Freshwater - Objectives

LF-O1 – Mauri and values of freshwater bodies

Maintain or enhance the mauri and identified values of freshwater 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.*

Freshwater values have been a significant influence on the Project design. The Mangaheka Stream corridor has been retained as a central element of the Masterplan and will be reconstructed and enhanced through a widened flood corridor, a meandering baseflow channel, riparian planting and habitat enhancement. The Te Otamanui Stream will also be retained and enhanced.

The Project adopts an integrated catchment-based approach to freshwater and stormwater management across the Mangaheka, Te Rapa and Te Otamanui catchments. Stormwater will be managed through a treatment train incorporating source controls, raingardens, vegetated conveyance systems, constructed wetlands, attenuation and stream enhancement.

The Project will nevertheless modify parts of the existing freshwater environment, including reclamation of Watercourse M13 and modification of parts of the wider drainage network. Those effects are proposed to be managed through stream restoration and enhancement, riparian planting, fish salvage and relocation, black mudfish habitat creation and fish-passage measures.

Overall, the Project is considered generally consistent with Objective LF-O1.

LF-O2 – Allocation and use of freshwater

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.*

The Project's water-supply strategy is based on a new internal reticulation network connected to an approved external bulk water-supply source. The strategy provides for interim servicing arrangements to enable staged development, with ultimate water-supply infrastructure comprising a strategic reservoir and bulk main connection to service the full Development.

The Project also has a relationship with the separate Waikato River water-allocation framework that has been considered through engagement with WRC and the relevant infrastructure providers. The proposed servicing strategy is staged and will be refined through detailed design and hydraulic modelling to ensure that water supply is aligned with development demand and available network capacity.

Accordingly, the Project recognises the need for efficient and sustainable use and allocation of freshwater and is considered generally consistent with Objective LF-O2.

LF-O3 – Riparian areas and wetlands

Riparian areas (including coastal dunes) and wetlands are managed to:

The Project incorporates a comprehensive programme of riparian restoration, stream enhancement, constructed stormwater wetlands, black mudfish habitat creation and



1. <i>maintain and enhance:</i> a. <i>public access; and</i> b. <i>amenity values.</i> 2. <i>maintain or enhance:</i> a. <i>water quality;</i> b. <i>indigenous biodiversity;</i> c. <i>natural hazard risk reduction;</i> d. <i>cultural values;</i> e. <i>riparian habitat quality and extent; and</i> f. <i>wetland quality and extent.</i>	ecological enhancement centred on the Mangaheka Stream corridor and associated stormwater network. These measures are intended to improve water quality, indigenous biodiversity, riparian habitat quality, ecological function, flood management and amenity values. The constructed stormwater wetlands form part of the stormwater treatment and attenuation network and are distinct from natural inland wetlands. While the Project will modify parts of the existing highly modified freshwater environment, it incorporates substantial restoration and enhancement measures intended to improve the long-term condition and function of riparian and freshwater habitats. The Project is therefore considered generally consistent with Objective LF-O3.
LF-O5 – High class soils <i>The value of high class soils for primary production is recognised, and high class soils are protected from inappropriate subdivision, use or development.</i>	The Project will result in the permanent conversion of land containing high class soils from primary production to industrial use. It therefore does not directly align with the protection direction of Objective LF-O5. The significance of that tension is informed by the actual productive characteristics of the Site. The agricultural assessment identifies that much of the Site is affected by very poor drainage, organic soils and significant wetness limitations, which constrain its versatility and suitability for higher-value horticultural and arable production. The Project also responds to a demonstrated demand for additional industrial land in a location immediately adjoining Hamilton's established Te Rapa industrial area and strategic transport network. The tension with Objective LF-O5 is therefore acknowledged and must be considered as part of the overall statutory assessment alongside the productive characteristics of the Site and the strategic, economic and urban-development benefits of the Project.
Land and Freshwater - Policies	
LF-P1 – Approach to identifying freshwater body values and managing freshwater bodies <i>Waikato Regional Council will facilitate a process that will involve regional communities, to identify values and establish subsequent freshwater objectives, limits and targets for freshwater bodies. The value setting process will:</i> 1. <i>provide for variability in catchment management response;</i> 2. <i>assist in ensuring that adverse effects of activities on the identified values of water bodies are managed in an integrated manner;</i>	The Project has been informed by an integrated assessment of freshwater values within the Mangaheka, Te Rapa and Te Otamanui catchments and their downstream receiving environments. Freshwater values have informed the development outcome, stormwater design, stream restoration, riparian enhancement, flood management and ecological management measures. The Project therefore responds consistently with the integrated freshwater-management direction reflected in Policy LF-P1.



3. <i>determine any outstanding freshwater bodies and significant values of wetlands; and</i> 4. <i>recognise that where a freshwater body is currently used for the purposes of renewable electricity generation or domestic or municipal supply, those uses are recognised as being values associated with that water body.</i>	
LF-P3 – All freshwater bodies <i>Manage the effects of activities to maintain or enhance the identified values of freshwater bodies and coastal water including by:</i> 1. <i>reducing:</i> a. <i>sediment in freshwater bodies and coastal water (including bank instability) that is derived from human based activities;</i> b. <i>accelerated sedimentation of estuaries;</i> c. <i>microbial and nutrient contamination;</i> d. <i>other identified contaminants; and</i> 2. <i>Where appropriate, protection and enhancement of:</i> a. <i>riparian and wetland habitat;</i> b. <i>instream habitat diversity;</i> c. <i>indigenous biodiversity; and</i> 3. <i>providing for migratory patterns of indigenous freshwater species up and down rivers and streams and to the coastal marine area where practicable; and</i> 4. <i>avoiding:</i> a. <i>physical modification of freshwater bodies where practicable; and</i> b. <i>inappropriate development in flood plains; and</i> 5. <i>managing:</i> a. <i>groundwater and surface water flow/level regimes, including flow regime variability;</i> b. <i>linkages between groundwater and surface water; and</i> c. <i>pest and weed species where they contribute to freshwater body and coastal water degradation.</i>	The Project has sought to avoid or minimise modification of freshwater bodies where practicable through retention and enhancement of the Mangaheka and Te Otamanui Streams. The Project will nevertheless result in reclamation of Watercourse M13 and modification of parts of the wider drainage network, including habitat used by black mudfish. Those effects have been assessed and are proposed to be managed through the effects management hierarchy, including stream creation and enhancement, riparian restoration, fish salvage and relocation, dedicated black mudfish habitat creation and improved fish passage. The Project also incorporates an integrated stormwater treatment train to manage sediment, contaminants and hydrological effects associated with future industrial development. Construction effects will be managed through erosion and sediment controls and relevant management plans. On that basis, the Project is considered generally consistent with the relevant direction of Policy LF-P3.



LF-P4 – Catchment-based intervention <i>Identify catchments, including Waikato River and Lake Taupō, that require specific intervention to address the adverse effects of activities and land use changes. In identifying catchments that require intervention, and in undertaking that intervention the following will be considered:</i> <i>1. national or legislative direction;</i> <i>2. the identified values of the freshwater bodies;</i> <i>3. tangata whenua values;</i> <i>4. the degree of improvement in water quality able to be attained by changes to land use practices and discharge practices;</i> <i>5. existence and ongoing operation of significant renewable electricity generation activities;</i> <i>6. the degree and purpose of intervention or modification that has already occurred along the freshwater body;</i> <i>7. the availability of water to meet the existing and reasonably justified and foreseeable future domestic and municipal water supply requirements;</i> <i>8. the existence of regionally significant industry;</i> <i>9. the potential to address more than one environmental issue through the intervention;</i> <i>10. the vulnerability and values of the whole catchment and its receiving environment (including the coastal marine area);</i> <i>11. the consequences of inaction and delay; and</i> <i>12. the social and economic benefits and costs to the community.</i>	The Project adopts a catchment-based approach to freshwater management across the Mangaheka, Te Rapa and Te Otamanui catchments, recognising the interrelationship between land use, water quality, water quantity, freshwater ecology, groundwater, flood management and cultural values. The Project provides an opportunity to address multiple environmental issues through an integrated package of stormwater treatment, stream restoration, riparian enhancement, flood management and ecological restoration. The Project also recognises the downstream relationship between the Site, the Waipā River and the wider Waikato River catchment, while providing substantial social and economic benefits. The Project is therefore considered generally consistent with Policy LF-P4.
LF-P5 – Waikato River catchment <i>Recognise Te Ture Whaimana o Te Awa o Waikato – the Vision and Strategy for the Waikato River – as the primary direction-setting document for the Waikato River and develop an integrated, holistic and co-ordinated approach to implementation.</i>	Te Ture Whaimana is recognised as the primary direction-setting document for the Waikato River catchment. The Project has been developed using an integrated approach to freshwater management that recognises the relationship between the Mangaheka Stream, the Waipā River and the wider Waikato River system. The Project incorporates stormwater treatment, stream restoration, riparian enhancement, habitat creation, fish-passage improvement and ecological restoration intended to improve freshwater outcomes over time. The Project has also been informed by engagement with tangata whenua and the CIA, including consideration of cultural values associated with freshwater and the wider Waikato River catchment.



	The Project is therefore considered generally consistent with Policy LF-P5 and the direction of Te Ture Whaimana.
LF-P11 – High class soils <i>Avoid a decline in the availability of high class soils for primary production due to inappropriate subdivision, use or development.</i>	The Project will permanently convert high class soils from primary production to industrial use and therefore gives rise to a clear tension with Policy LF-P11. The productive capacity of the affected land is not uniform. The agricultural assessment identifies significant drainage and wetness constraints across much of the Site, which reduce its productive versatility despite its land-use capability classification. The Site is also immediately adjacent to the established Te Rapa industrial area and key strategic transport infrastructure, and the Economic Assessment identifies a demonstrated long-term demand for additional industrial capacity, particularly in north-west Hamilton. Those matters do not remove the tension with the protective direction of Policy LF-P11. They are, however, relevant to the significance of that tension and to the wider statutory assessment of the Project.
Ecosystem and indigenous biodiversity - Objectives	
ECO-O1 – Ecological integrity and indigenous biodiversity <i>The full range of ecosystem types, their extent and the indigenous biodiversity that those ecosystems can support exist in a healthy and functional state.</i>	The Site is a highly modified rural environment dominated by pasture, cropping, artificial drains and exotic vegetation. Terrestrial ecological values are generally low and the EclA does not identify any significant terrestrial indigenous vegetation or habitat within the Project Area. The EclA does, however, identify artificial drains supporting black mudfish as significant habitat of indigenous fauna under the WRPS APP5 criteria. Black mudfish are classified as At Risk – Declining and parts of the drainage network provide important habitat for the species. The Project will affect parts of that habitat, together with other freshwater and terrestrial ecological values. Those effects have informed the Project design and are proposed to be managed through fish salvage and relocation, dedicated black mudfish habitat creation, restoration and enhancement of the Mangaheka Stream corridor, riparian planting, fauna-specific management measures and wider ecological restoration. The Project will therefore result in some adverse effects on existing indigenous biodiversity values, but also substantial restoration and enhancement outcomes intended to improve ecological function, habitat quality and connectivity over time. Overall, the Project is considered generally consistent with Objective ECO-O1.
Ecosystem and indigenous biodiversity - Policies	
ECO-P1 – Maintain or enhance indigenous biodiversity <i>Promote positive indigenous biodiversity outcomes to maintain the full range of ecosystem types and maintain or enhance their spatial extent as</i>	The Project has sought to maintain and enhance indigenous biodiversity through an integrated package of avoidance, effects management, restoration and habitat creation measures.



<i>necessary to achieve healthy ecological functioning of ecosystems, with a particular focus on:</i> <i>1. working towards achieving no net loss of indigenous biodiversity at a regional scale;</i> <i>2. the continued functioning of ecological processes;</i> <i>3. the re-creation and restoration of habitats and connectivity between habitats;</i> <i>4. supporting (buffering and/or linking) ecosystems, habitats and areas identified as significant indigenous vegetation and significant habitats of indigenous fauna;</i> <i>5. providing ecosystem services;</i> <i>6. the health and wellbeing of the Waikato River and its catchment;</i> <i>7. contribution to natural character and amenity values;</i> <i>8. tangata whenua relationships with indigenous biodiversity including their holistic view of ecosystems and the environment;</i> <i>9. managing the density, range and viability of indigenous flora and fauna; and</i> <i>10. the consideration and application of biodiversity offsets.</i>	The Project will affect significant habitat for black mudfish within parts of the artificial drainage network. Those effects are proposed to be addressed through capture and translocation, creation and establishment of dedicated replacement black mudfish habitat, monitoring and adaptive management. The Project will also restore and enhance the Mangaheka Stream corridor, increase indigenous vegetation cover and improve habitat connectivity across the Site. Those measures contribute positively to ecological processes, freshwater health, natural character and the relationship of tangata whenua with indigenous biodiversity. Terrestrial ecological effects are comparatively limited. No significant terrestrial indigenous vegetation or habitat has been identified within the Project Area, although potential habitat for indigenous fauna including lizards and long-tailed bats is recognised and managed through fauna-specific measures. On balance, the Project is considered generally consistent with the direction of Policy ECO-P1.
<i>ECO – P2 – Protect significant indigenous vegetation and significant habitats of indigenous fauna</i> <i>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.</i>	The EclA identifies parts of the artificial drainage network supporting black mudfish as significant habitat of indigenous fauna under the WRPS APP5 criteria. ECO-P2 is therefore directly relevant. The Project will result in the loss or modification of some existing significant black mudfish habitat. The effects-management response includes capture and translocation of black mudfish, creation and establishment of dedicated replacement habitat before affected habitat is lost, hydrological and ecological monitoring, and adaptive management. The replacement habitat is intended to provide the hydrological, vegetation, refuge and habitat characteristics necessary to support black mudfish and to establish and maintain a self-sustaining population within the Project Area. While the Project will modify existing significant habitat, the proposed management framework is intended to retain the ecological characteristics and population values that contribute to the significance of that habitat. On that basis, the Project is considered generally consistent with the direction of Policy ECO-P2.



ECO – P3 – Collaborative management <i>Maintaining and enhancing indigenous biodiversity shall be promoted in an integrated and efficient manner including by working collaboratively with landowners, resource managers, tangata whenua and other stakeholders.</i>	The Project has been developed through a collaborative approach involving tangata whenua, ecologists, engineers, landscape architects, planners, local authorities and other relevant stakeholders. Ecological outcomes have been developed through the EclA, CIA and associated management plans and are integrated with freshwater management, stormwater treatment, flood management, landscape and cultural outcomes. The Project also provides for continuing collaboration during implementation through the relevant ecological management plans, monitoring requirements and mana whenua involvement. The Project is therefore considered consistent with Policy ECO-P3.
Hazards and risk - Objectives	
HAZ-O1 – Natural hazards <i>The effects of natural hazards on people, property and the environment are managed by:</i> <i>1. increasing community resilience to hazard risks;</i> <i>2. reducing the risks from hazards to acceptable or tolerable levels; and</i> <i>3. enabling the effective and efficient response and recovery from natural hazard events.</i>	Natural hazard risk associated with the Project has been assessed through the Geotechnical Investigation Report, hydraulic modelling, Stormwater Management Plan, Hydrogeological Effects Assessment and supporting infrastructure assessments. The principal natural hazards relevant to the Project include flooding, liquefaction, lateral spreading, settlement and slope instability. The GIR assesses those hazards using the risk framework in the NPS-NH and identifies appropriate engineering and design controls. No Very High residual geotechnical risk is identified, with residual risks generally assessed as Low or Medium following implementation of the proposed controls. Flood risk has also been incorporated into the development outcome, including finished platform levels, attenuation wetlands, dedicated conveyance corridors, overland flow paths and reconstruction of the Mangaheka Stream corridor. Hydraulic modelling has assessed existing and post-development flood behaviour for the 2-, 10- and 100-year ARI events. Remaining site-specific investigation and detailed-design requirements are normal for a development of this scale and do not represent unresolved feasibility constraints. The Project is therefore considered consistent with Objective HAZ-O1.
Hazards and risk - Policies	
HAZ-P1 – Natural hazard risk management approach <i>Natural hazard risks are managed using an integrated and holistic approach that:</i> <i>1. ensures the risk from natural hazards does not exceed an acceptable level;</i> <i>2. protects health and safety;</i> <i>3. avoids the creation of new intolerable risk;</i> <i>4. Reduces intolerable risk to tolerable or acceptable levels;</i>	The Project adopts an integrated and risk-based approach to natural hazard management, informed by site-specific geotechnical, hydrogeological and hydraulic investigations. Geotechnical risks associated with liquefaction, lateral spreading, settlement, bearing capacity and slope instability are proposed to be managed through earthworks design, ground improvement where required, retaining and slope-stability measures, settlement monitoring and future site-specific building and foundation design. Flood risk is addressed through attenuation wetlands, conveyance channels, overland flow paths, finished platform levels and reconstruction of the Mangaheka Stream corridor. The



5. <i>enhances community resilience;</i> 6. <i>is aligned with civil defence approaches;</i> 7. <i>prefers the use of natural features over man-made structures as defences against natural hazards;</i> 8. <i>recognises natural systems and takes a 'whole of system' approach; and</i> 9. <i>seeks to use the best available information/best practice.</i>	flood-management framework also incorporates climate-change-adjusted rainfall and considers effects on adjoining and downstream land. The Project therefore manages natural hazard risk using an integrated and proportionate approach based on the best available information and is considered consistent with Policy HAZ-P1.
HAZ-P2 – Manage activities to reduce the risks from natural hazards <i>Subdivision, use and development are managed to reduce the risks from natural hazards to an acceptable or tolerable level including by:</i> 1. <i>ensuring risk is assessed for proposed activities on land subject to natural hazards;</i> 2. <i>reducing the risks associated with existing use and development where these risks are intolerable;</i> 3. <i>avoiding intolerable risk in any new use or development in areas subject to natural hazards;</i> 4. <i>minimising any increase in vulnerability due to residual risk;</i> 5. <i>avoiding the need or demand for new structural protection works; and</i> 6. <i>discouraging hard protection structures and promoting the use of alternatives to them, including natural defences in the coastal environment.</i>	The Project has been designed to avoid creating intolerable natural hazard risk and to reduce identified risks to acceptable or tolerable levels. The GIR identifies no Very High residual geotechnical risk following implementation of the proposed engineering controls. Where further site-specific design is required, including for retaining walls, slope stability, settlement and future building foundations, the available investigations establish that feasible engineering solutions are available. Flood modelling has informed the development outcome so that future development platforms are located outside the principal flood-conveyance areas and flood flows are managed through the public road, stormwater and Mangaheka Stream corridors. The proposed stormwater system attenuates post-development peak flows and is designed to avoid a material increase in flood risk on adjoining or downstream properties. The Project is therefore considered consistent with Policy HAZ-P2.
HAZ-P4- Contaminated land <i>Identify and manage contaminated land to ensure human, plant and animal health, and water, air and soil quality are protected from unacceptable risk.</i>	The Project has been informed by a combined Preliminary and Detailed Site Investigation, which assessed the potential for contamination associated with historical land uses. The investigation concludes that contaminant concentrations are generally below the applicable commercial/industrial soil contaminant standards and do not present an unacceptable risk to the proposed industrial land use. Potential risks associated with soil disturbance will be managed through the proposed Site Management Plan, including requirements for soil handling, reuse and disposal and procedures for unexpected contamination encountered during earthworks. The Project is therefore considered consistent with Policy HAZ-P4.
Historical and cultural values - Objectives	
HCV-O1 – Historic and cultural heritage <i>Sites, structures, landscapes, areas or places of historic and cultural heritage are protected, maintained or enhanced in order to retain the</i>	The Project has been informed by archaeological assessment and engagement with tangata whenua, including preparation of the CIA.



<i>identity and integrity of the Waikato region's and New Zealand's history and culture.</i>	No recorded archaeological sites or scheduled historic heritage features have been identified within the Project Area that require specific protection. The archaeological assessment nevertheless recognises the potential for previously unidentified subsurface archaeological material to be encountered during earthworks. Cultural values associated with the Site and wider landscape, including freshwater and the Mangaheka Stream catchment, have been identified through engagement with tangata whenua and the CIA and have informed the design and environmental management framework for the Project. Accidental discovery protocols and the archaeological authority framework provide for the management of any previously unidentified archaeological material encountered during construction. The Project is therefore considered generally consistent with Objective HCV-O1.
Historical and cultural values - Policies	
<i>HCV-P2 – Relationship of Māori to taonga</i> <i>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.</i>	Tangata whenua have been actively involved in development of the Project through the TWWG, hui, site visits, technical engagement and preparation of the CIA. That engagement has identified cultural values associated with ancestral land, freshwater, the Mangaheka Stream catchment, indigenous species and the wider Waikato River system and has informed the Project design, freshwater and ecological restoration framework and proposed management measures. The proposed Mana Whenua Management Plan will provide for ongoing mana whenua involvement during implementation, including cultural monitoring, cultural protocols and input into ecological restoration and environmental management. The Project therefore recognises and provides for the relationship of tangata whenua and their culture and traditions with ancestral lands, water and other taonga, consistent with Policy HCV-P2.
<i>HCV-P3 – Effects of development on historic and cultural heritage</i> <i>Manage subdivision, use and development to give recognition to historic and cultural heritage and to integrate it with development where appropriate.</i>	The Project has been informed by archaeological assessment and the CIA. No recorded archaeological sites or scheduled historic heritage features within the Project Area have been identified as requiring specific avoidance or integration into the subdivision layout. The potential for previously unidentified archaeological material to be encountered during large-scale earthworks is nevertheless recognised. That risk will be managed through the relevant archaeological authority and accidental discovery protocols. Cultural values identified through engagement with tangata whenua are also incorporated through the freshwater and ecological restoration framework, cultural monitoring and the proposed Mana Whenua Management Plan.



	The Project therefore provides an appropriate framework for recognising and managing historic and cultural heritage values during subdivision and development and is considered generally consistent with Policy HCV-P3.
Natural character - Objectives	
NATC-O1 – Natural character <i>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.</i>	The Project will affect the natural character of the Mangaheka Stream, Watercourse M13 and parts of the wider drainage network through stream reconstruction, reclamation, culverts, stormwater infrastructure and associated earthworks. The affected freshwater environments are, however, already highly modified. The Mangaheka Stream and associated drainage network have been substantially influenced by historical pastoral drainage, channel modification, vegetation clearance and surrounding rural land use and do not exhibit pristine or outstanding natural character. The Project has been designed to respond to that existing level of modification while providing substantial opportunities for restoration and enhancement. The Mangaheka Stream corridor will be reconstructed with a meandering baseflow channel, varied instream habitat, riparian planting and a wider vegetated corridor, while the wider stormwater and ecological network will increase indigenous vegetation and improve freshwater habitat and connectivity. Accordingly, while the Project will result in further physical modification of freshwater environments, it also provides for significant restoration and enhancement of natural elements within an already highly modified setting. The Project is therefore considered generally consistent with Objective NATC-O1.
Natural character - Policies	
NATC-P1 – Preserve natural character <i>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:</i> <i>1. where natural character is pristine or outstanding, activities should avoid adverse effects on natural character;</i> <i>2. where natural elements/influences are dominant, activities should avoid significant adverse effects and avoid, remedy or mitigate other adverse effects on natural character;</i> <i>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;</i>	The freshwater environments affected by the Project are predominantly modified and human-influenced. The Mangaheka Stream and artificial drainage network have been altered through historical drainage, channelisation, vegetation clearance and surrounding pastoral land use, and neither the technical assessments nor the planning framework identify them as having pristine or outstanding natural character. NATC-P1 recognises that where man-made elements and influences are dominant, further adverse effects on natural character may be appropriate, while opportunities to remedy, mitigate, restore and enhance natural character should still be pursued. The Project will result in further modification through reconstruction of the Mangaheka Stream, reclamation of Watercourse M13, culverts and associated stormwater infrastructure. These effects are proposed to be addressed through restoration and enhancement of the Mangaheka Stream corridor, creation of a more naturalised meandering low-flow channel, instream habitat features, extensive indigenous riparian planting and integration of the stream with the wider ecological and open-space network.



4. <i>promote the enhancement, restoration, and rehabilitation of the natural character of the coastal environment, wetlands and lakes and rivers and their margins; and</i> 5. <i>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.</i>	The location and form of stream and stormwater works are also influenced by their functional requirements for flood conveyance, stormwater management, infrastructure servicing and ecological restoration. On balance, the Project is considered generally consistent with Policy NATC-P1 because the affected environments have relatively low existing natural character and the Project incorporates substantial measures to restore and enhance natural elements and ecological function.
Urban form and development - Objectives	
UFD-O1 – Built environment <i>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:</i> 1. <i>promoting positive indigenous biodiversity outcomes;</i> 2. <i>preserving and protecting natural character, and protecting outstanding natural features and landscapes from inappropriate subdivision, use, and development;</i> 3. <i>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;</i> 4. <i>integrating land use and water planning, including to ensure that sufficient water is available to support future planned growth;</i> 5. <i>recognising and protecting the value and long-term benefits of regionally significant infrastructure;</i> 6. <i>protecting access to identified significant mineral resources;</i> 7. <i>minimising land use conflicts, including minimising potential for reverse sensitivity;</i> 8. <i>anticipating and responding to changing land use pressures outside the Waikato region which may impact on the built environment within the region;</i> 9. <i>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;</i>	The Project represents a significant addition to industrial development capacity within the Hamilton urban environment, providing approximately 123 ha of net developable industrial land immediately adjoining the established Te Rapa industrial area. The Project has been comprehensively masterplanned and is supported by an integrated and staged infrastructure framework addressing transport, stormwater, water supply, wastewater and utilities. Infrastructure delivery is linked to development staging and capacity. The development outcome also integrates freshwater restoration, ecological enhancement, landscape and open-space outcomes, natural-hazard management and tangata whenua values. The Project therefore represents a strategic and infrastructure-integrated response to an identified business land development opportunity and is considered generally consistent with Objective UFD-O1.



10. <i>promoting a viable and vibrant central business district in Hamilton city, with a supporting network of sub-regional and town centres; and</i> 11. <i>providing for a range of commercial development to support the social and economic wellbeing of the region.; and</i> 12. <i>strategically planning for growth and development to create responsive and well-functioning urban environments, that:</i> <i>a. support reductions in greenhouse gas emissions and are resilient to the current and future effects of climate change;</i> <i>b. improve housing choice, quality, and affordability;</i> <i>c. enable a variety of homes that enable Māori to express their cultural traditions and norms;</i> <i>d. ensure sufficient development capacity, supported by integrated infrastructure provision, for identified housing and business needs in the short, medium and long term;</i> <i>e. improves connectivity within urban areas, particularly by active transport and public transport;</i> <i>f. take into account the values and aspirations of hapū and iwi for urban development.</i>	
Urban form and development - Policies	
<i>UFD-P1 – Planned and co-ordinated subdivision, use and development</i> <i>Subdivision, use and development of the built environment, including transport, occurs in a planned and co-ordinated manner which:</i> <i>1. has regard to the principles in APP11;</i> <i>2. recognises and addresses potential cumulative effects of subdivision, use and development;</i> <i>3. is based on sufficient information to allow assessment of the potential long-term effects of subdivision, use and development; and</i> <i>4. has regard to the existing built environment.</i>	The Project has been informed by a comprehensive suite of technical assessments and management plans which have considered the long-term and cumulative effects of the proposed subdivision and development. Those assessments have informed a coordinated development outcome integrating land use, transport, three-waters infrastructure, freshwater, ecology, landscape, natural hazards and open-space outcomes. The Project also responds to the existing built environment and strategic transport network, including its relationship with Te Rapa, SH1C, SH39 and surrounding planned growth areas. The development outcome reflects the relevant APP11 principles, including coordinated infrastructure provision, management of natural hazards, enhancement of indigenous biodiversity and freshwater values, recognition of tangata whenua values, climate resilience and management of interfaces with surrounding land. The Project is therefore considered consistent with Policy UFD-P1.



UFD-P2 – Co-ordinating growth and infrastructure <i>Management of the built environment ensures:</i> 1. <i>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:</i> a. <i>optimise the efficient and affordable provision of both the development and the infrastructure;</i> b. <i>maintain or enhance the operational effectiveness, viability and safety of existing and planned infrastructure;</i> c. <i>protect investment in existing infrastructure; and</i> d. <i>ensure new development does not occur until provision for appropriate infrastructure necessary to service the development is in place;</i> 2. <i>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;</i> 3. <i>the efficient and effective functioning of infrastructure, including transport corridors, is maintained, and the ability to maintain and upgrade that infrastructure is retained; and</i> 4. <i>a co-ordinated and integrated approach across regional and district boundaries and between agencies; and</i> 5. <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.</i>	The Project is supported by an integrated and staged servicing framework addressing transport, stormwater, water supply, wastewater and utilities. The technical assessments establish that the development is serviceable, with infrastructure delivery linked to development staging, network capacity and identified infrastructure triggers. The Project has also been developed through coordinated engagement with WDC, HCC, WRC, IAWAI and NZTA to address interfaces with existing and planned infrastructure. That engagement has informed the transport connections, three-waters servicing strategy, infrastructure staging and proposed conditions. Development is therefore coordinated with the infrastructure necessary to service it, while maintaining the operational effectiveness of existing and planned infrastructure. The Project is considered consistent with Policy UFD-P2.
UFD-P4 – Energy demand management <i>Development should minimise transport, energy demand and waste production, encourage beneficial re-use of waste materials, and promote the efficient use of energy.</i>	The Project is located immediately adjoining the established Te Rapa industrial area and strategic transport network and will provide employment land in proximity to existing and planned urban growth areas. The internal transport network provides for walking, cycling and future public transport, while the Project's location supports efficient access to the strategic freight network. The development outcome also enables coordinated and efficient provision of utilities and infrastructure across the Site.



	These measures contribute to the efficient use of transport and energy resources and are generally consistent with Policy UFD-P4.
UFD-P11 – Adopting Future Proof land use pattern <i>Within the Future Proof area:</i> <i>1. new urban development shall occur within the Urban and Village Enablement Areas Limits indicated on Map 43 (5.2.10 Future Proof map (indicative only));</i> <i>2. new residential (including rural-residential) development shall be managed in accordance with the timing indicated on Map 43 (5.2.10 Future Proof map (indicative only)) 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) timing and population for growth areas in Table 34 (APP12);</i> <i>3. new industrial development should predominantly be located in the strategic industrial nodes in Table 35 (APP12) and in accordance with the indicative timings in that table except as set out in clause (7) below;</i> <i>4. other industrial development should only occur within the Urban Limits Enabled Areas indicated on Map 43 (5.2.10 Future Proof map (indicative only)), 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 in Table 35 (APP12) shall be provided for as appropriate in district plans;</i> <i>5. new industrial development outside the strategic industrial nodes or outside the allocation limits set out in Table 35 shall not be of a scale or location where the development undermines the role of any strategic industrial node as set out in Table 35;</i> <i>6. new industrial development outside the strategic industrial nodes must avoid, remedy or mitigate adverse effects on the transport system arterial, and on other infrastructure;</i> <i>7. where alternative industrial and residential urban land release patterns are promoted, either out-of-sequence or unanticipated on Map 43 or in Table 35, including proposals outside of the urban or village enablement areas indicated on Map 43, through</i>	The Site is not presently identified for industrial urban development within the operative Future Proof land-use pattern and remains zoned General Rural under the WDP-OiP. The Project therefore does not directly implement the mapped land-use pattern anticipated by Policy UFD-P11. The broader strategic context is nevertheless relevant. TKE immediately adjoins the established Te Rapa industrial area, is well connected to the strategic transport network and will provide approximately 123 ha of net developable industrial land in a part of the Hamilton industrial market where remaining supply is comparatively constrained. The Economic Assessment identifies industrial land demand of approximately 17–25 ha per annum and concludes that the Project represents approximately 7–11 years of future Hamilton industrial demand. The Project is also supported by an integrated and staged transport and three-waters servicing framework. The WRPS and Future Proof framework contemplate coordinated consideration of alternative or unanticipated urban development where the relevant strategic, infrastructure and environmental considerations are addressed. In that context, TKE responds positively to the broader direction for coordinated, infrastructure-supported growth. The Project nevertheless gives rise to a tension with the mapped Future Proof land-use pattern, and that tension must be considered alongside the Project's strategic location, infrastructure integration, contribution to business land capacity and the identified adverse effects associated with urbanisation, including the loss of high class soils. Accordingly, the Project is considered to respond generally to the strategic direction underlying Policy UFD-P11, while not directly implementing the mapped Future Proof land-use pattern.



<i>district plan and structure plan 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 responsive planning criteria in APP13; and</i> 8. <i>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 35, 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.</i>	
Relevant Appendices	
APP11- Development Principles <i>The general development principles for new development are:</i> <i>a. support existing urban areas in preference to creating new ones;</i> <i>b. occur in a manner that provides clear delineation between urban areas and rural areas;</i> <i>c. make use of opportunities for urban intensification and redevelopment, particularly within urban centres and along future rapid transit routes, to minimise the need for urban development in greenfield areas;</i> <i>d. not compromise the safe, efficient and effective operation and use of existing and planned infrastructure, including transport infrastructure, and should allow for future infrastructure needs, including maintenance and upgrading, where these can be anticipated;</i> <i>e. connect well with existing and planned development and infrastructure;</i> <i>f. identify water requirements necessary to support development and ensure the availability of the volumes required;</i> <i>g. be planned and designed to achieve the efficient use of water;</i> <i>h. be directed away from identified significant mineral resources and their access routes, natural hazard areas, energy and transmission corridors, locations identified as likely</i>	The Project has been assessed against the development principles in APP11. It responds positively to many of those principles through its location adjoining the established Te Rapa industrial area, integration with existing and planned transport and three-waters infrastructure, provision for walking, cycling and future public transport, catchment-based stormwater management, ecological restoration, climate-resilient infrastructure and recognition of tangata whenua values. The Project also provides for efficient use of infrastructure and land through a comprehensively masterplanned industrial development rather than dispersed development. There are, however, identifiable tensions with APP11, particularly the direction to avoid development on high class soils. The Project will permanently convert high class soils to industrial use, and that tension is acknowledged elsewhere in this assessment. The Project also modifies parts of the existing freshwater environment, although those effects are proposed to be managed through restoration, habitat creation, stormwater treatment and ecological enhancement. Overall, while the Project does not align with every APP11 principle, it responds positively to the majority of the relevant development principles and provides an integrated, infrastructure-supported urban development outcome.



renewable energy generation sites and their associated energy resources, regionally significant industry, highly productive land, and primary production activities on highly productive land except in accordance with the National Policy Statement for Highly Productive Land 2022;

- i. promote compact urban form, design and location to:
 - i. minimise energy and carbon use;*
 - ii. minimise the need for private motor vehicle use;*
 - iii. maximise opportunities to support and take advantage of public transport in particular by encouraging employment activities in locations that are or can in the future be served efficiently by public transport;*
 - iv. encourage walking, cycling and multi-modal transport connections; and*
 - v. maximise opportunities for people to live, work and play within their local area;**
- j. maintain or enhance landscape values and provide for the protection of historic and cultural heritage;*
- k. promote positive indigenous biodiversity outcomes and protect significant indigenous vegetation and significant habitats of indigenous fauna. Development which can enhance ecological integrity, such as by improving the maintenance, enhancement or development of ecological corridors, should be encouraged;*
- l. maintain and enhance public access to and along the coastal marine area, lakes, and rivers;*
- m. avoid as far as practicable adverse effects on natural hydrological characteristics and processes (including aquifer recharge and flooding patterns), soil stability, water quality and aquatic ecosystems including through methods such as low impact urban design and development (LIUDD);*
- n. adopt sustainable design technologies, such as the incorporation of energy-efficient (including passive solar) design, low-energy street lighting, rain gardens, renewable energy technologies, rainwater harvesting and grey water recycling techniques where appropriate;*



<i>o. not result in incompatible adjacent land uses (including those that may result in reverse sensitivity effects), such as industry, rural activities and existing or planned infrastructure;</i> <i>p. be appropriate with respect to current and projected future effects of climate change and be designed to allow adaptation to these changes and to support reductions in greenhouse gas emissions within urban environments;</i> <i>q. consider effects on the unique tangata whenua relationships, values, aspirations, roles and responsibilities with respect to an area. Where appropriate, opportunities to visually recognise tangata whenua connections within an area should be considered;</i> <i>r. support the Vision and Strategy for the Waikato River in the Waikato River catchment;</i> <i>s. encourage waste minimisation and efficient use of resources (such as through resource-efficient design and construction methods); and</i> <i>t. recognise and maintain or enhance ecosystem services.</i>	
APP13 – Responsive Planning Criteria	
Criteria A	
<i>A. That the development would add significantly to meeting a demonstrated need or shortfall for housing or business floor space, as identified in a Housing and Business Development Capacity Assessment or in council monitoring.</i>	Met. The Economic Assessment identifies industrial land demand in Hamilton of approximately 17–25 ha per annum and concludes that the approximately 123 ha of net developable industrial land proposed at TKE represents approximately 7–11 years of future Hamilton industrial demand. The Project will therefore make a significant contribution to meeting identified medium- and long-term business land demand, particularly within the comparatively constrained north-west Hamilton / Te Rapa industrial market.
<i>B. That the development contributes to a well-functioning urban environment. Proposals are considered to contribute to a well-functioning urban environment if they:</i> <i>i. have or enable a variety of homes that: meet the needs, in terms of type, price, and location, of different households; and/or enable Māori to express their cultural traditions and norms; and/or have or enable a variety of sites that are suitable for different business sectors in terms of location and site size; and</i>	Met. TKE will provide a range of industrial lot sizes capable of accommodating different business sectors and occupiers, including flexibility for lots to be combined for larger industrial activities. The Project is immediately adjacent to the established Te Rapa industrial area and close to significant existing and planned residential growth. It will also provide a substantial additional source of industrial land and therefore support greater choice and competition within the industrial land market.



ii. <i>support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets.</i>	
C. <i>That the development is consistent with the Future Proof Strategy guiding principles, and growth management directives (as set out in Sections B2, B3, B5, B6, B7, B8, B9, B10 and B11 of the strategy).</i>	Generally met. The Project is not presently identified within the mapped Future Proof urban land-use pattern and therefore does not directly implement that pattern. It nevertheless responds positively to the broader Future Proof direction through consolidation adjacent to an established industrial node, significant additional business land capacity, integrated infrastructure delivery, multimodal transport provision, freshwater restoration and tangata whenua involvement. The tension with the mapped land-use pattern is acknowledged.
D. <i>That the development has good accessibility for all people between housing, jobs, educational facilities, community services, natural spaces, and open spaces, including by way of public or active transport.</i>	Met. The Project is located adjacent to the established Te Rapa employment area and close to significant existing and planned residential growth in north-west Hamilton. The internal transport network provides walking and cycling connections, links to the external active-mode network and provision for future public transport. The proposed Neighbourhood Centre and open-space network will also provide supporting services and recreational opportunities within the Development.
E. <i>In cases where development is being brought forward, whether it can be demonstrated that there is commitment to and capacity available for delivering the development within the advanced timeframe.</i>	Met. TKE is being advanced through a substantive Fast-track application and is supported by a comprehensively developed Masterplan, detailed technical assessments, infrastructure design, staging controls, management plans and proposed conditions. The infrastructure framework identifies the servicing required at each stage and provides an established pathway for implementation of the Development.
F. <i>In cases where the development is proposing to replace a planned land use with an unanticipated land use, whether it can be demonstrated that the proposal will not result in a shortfall in residential, commercial or industrial land, with robust data and evidence underpinning this analysis.</i>	Not directly applicable. The Site is currently zoned General Rural and is not land already allocated within the Future Proof framework for an alternative residential, commercial or industrial urban use. The Project therefore does not displace planned urban development capacity. It will, however, permanently remove rural production land, including high class and highly productive land, which is separately assessed under the relevant WRPS and NPS-HPL provisions.
G. <i>That the development protects and provides for human health.</i>	Met. Potential effects relevant to human health and safety have been assessed through the contaminated-land, noise, transport, natural-hazard, stormwater, geotechnical and infrastructure assessments. The combined PSI/DSI concludes that soil contaminant concentrations are below the applicable criteria for the proposed industrial land use and are highly unlikely to pose a risk to human health. The Project also incorporates appropriate design measures, management plans and consent conditions to manage construction and operational effects.
H. <i>That the development would contribute to the affordable housing stock within the sub-region, with robust data and evidence underpinning this analysis.</i>	Not applicable. TKE is predominantly an industrial development and does not provide residential housing capacity.



I. <i>That the development does not compromise the efficiency, affordability or benefits of existing and/or proposed infrastructure, including additional infrastructure, in the sub-region.</i>	Met, subject to the proposed staging and infrastructure controls. Transport and three-waters effects have been specifically assessed. The development is staged in accordance with network capacity and identified upgrades, including external transport works and interim and ultimate water and wastewater servicing arrangements. The Infrastructure Report establishes that TKE is serviceable and can be integrated with existing and planned networks without compromising their operation, subject to the identified triggers and upgrades. The upgrades, and TKE's contribution to those upgrades, are to be secured by the Private Development Agreement.
J. <i>That the development can be serviced without undermining committed infrastructure investments made by network utility operators, local authorities or central government (including NZ Transport Agency). Development must be shown to be adequately serviced without undermining committed infrastructure investments made by network utility operators, local authorities or central government to support other growth areas.</i>	Generally met. The servicing framework has been developed through coordinated engagement with WDC, HCC, WRC, IAWAI and NZTA and provides for staged interim and ultimate infrastructure solutions. The Project does not rely on infrastructure identified as being committed exclusively to another growth area. However, the final timing and funding of some strategic infrastructure will continue to require coordination with the relevant infrastructure providers.
K. <i>That the development demonstrates efficient use of local authority and central government financial resources, including prudent local authority debt management. This includes demonstration of the extent to which cost neutrality for public finances can be achieved.</i>	Generally met, subject to final funding arrangements. The Project is privately initiated and infrastructure required specifically to enable TKE is intended to be delivered through the Development and associated infrastructure and funding arrangements. The application identifies the infrastructure upgrades and staging triggers required to service development. Final funding arrangements will continue to be agreed with the relevant infrastructure providers, and complete cost neutrality should not be assumed unless confirmed through those arrangements.
L. <i>The compatibility of any proposed land use with adjacent land uses including planned land uses.</i>	Generally met. The Project immediately adjoins the established Te Rapa industrial area and represents a logical extension of the existing industrial employment area. Interfaces with adjoining rural land are managed through landscape buffers, stormwater and ecological corridors, setbacks and controls on sensitive and non-industrial activities. The Development Framework maintains industrial primacy and is intended to avoid materially constraining the continued operation of adjoining rural activities.
M. <i>That the development would contribute to mode-shift that supports the medium and long-term transport vision for the sub-region being the creation of a rapid and frequent multi-modal transport network and active mode network.</i>	Met. The development outcome incorporates a multimodal internal transport network, segregated walking and cycling facilities, connections to the wider active-mode network, a grade-separated crossing of SH39 and provision for future public transport. The transport assessment concludes that the Project is well aligned with broader objectives relating to integrated land use and transport, accessibility and network resilience.
N. <i>That the development would support reductions in greenhouse gas emissions and would be resilient to the likely current and future effects of climate change, with robust evidence underpinning this assessment.</i>	Generally met. Climate-change-adjusted rainfall has been incorporated into the stormwater and flood-management framework, including the design of attenuation wetlands, conveyance corridors, overland flow paths and the Mangaheka Stream corridor. The Project also provides active-mode and future public-transport infrastructure and



	locates employment land adjacent to an established industrial node and significant planned residential growth. While an overall reduction in greenhouse-gas emissions has not been separately demonstrated, the Project provides an integrated land-use and transport framework capable of supporting lower-emission travel and is designed to be resilient to future climate-change effects.
O. <i>That the development provides for the values that make the area wāhi toitū and can avoid or mitigate any adverse effects arising in respect of those values as a result of the proposed development.</i>	Not applicable. No part of the Site appears to be mapped wāhi toitū, this criterion is not directly applicable.
P. <i>During a review of the Future Proof strategy (including the development of a Future Development Strategy under the National Policy Statement on Urban Development 2020 and its subsequent 3-yearly review), or a comprehensive district plan review, consideration may be given to urban development on areas identified as wāhi toitū. A strong precautionary approach will be taken such that if the land is not needed to fill an identified shortfall of development capacity in the short-medium term, it should not be considered for urban development. Preference will be given to urban development proposals which are not located on areas identified as wāhi toitū.</i>	Not applicable. No part of the Site appears to be mapped as wāhi toitū, this criterion is not directly applicable.
Q. <i>That a precautionary approach be taken when considering development on areas identified as wāhi toiora, such that if the land is not needed in the short-medium term it should not be considered for urban development.</i>	Generally met. The Project Site is located within a mapped wāhi toiora area and this criterion is therefore directly relevant. The criterion does not preclude urban development within wāhi toiora, but requires a precautionary approach, particularly where the land is not required in the short to medium term. The Economic Assessment identifies current and future demand for additional industrial land within Hamilton, including comparatively constrained industrial land supply within the north-west Hamilton / Te Rapa market. TKE will provide approximately 123 ha of net developable industrial land and represents approximately 7–11 years of future industrial demand. The Project is also being progressed as a substantive Fast-track application supported by detailed technical assessments, a staged infrastructure framework and a clear implementation pathway. Accordingly, there is a demonstrated need for additional industrial capacity within the relevant planning horizon and the Project is considered to respond appropriately to the precautionary direction of Criteria A(q).
Criteria B	
A. <i>The development will not affect the feasibility, affordability and deliverability of planned growth within Urban or Village Enablement Areas over the short, medium and long term.</i>	Generally met. The Project adds industrial development capacity rather than replacing planned urban capacity. The Economic Assessment identifies an existing medium- and long-term demand for industrial land and a particular constraint within the north-west Hamilton / Te Rapa market. The Project therefore supplements planned business land supply rather



	than displacing it. The staged servicing framework is also intended to ensure that TKE does not compromise the delivery of infrastructure required for other planned growth areas.
<i>B. Value capture can be implemented and cost neutrality for public finance can be achieved.</i>	Generally met, subject to final funding arrangements. The Project is privately initiated and infrastructure required specifically to enable TKE is intended to be delivered through the Development and associated development and funding arrangements. However, complete value capture and cost neutrality have not been separately demonstrated in the application and will depend on the final infrastructure funding arrangements agreed with the relevant authorities and providers.
<i>C. The development will not adversely affect the function and vitality of existing rural settlements and/or urban areas.</i>	Met. TKE is predominantly industrial and the Development Framework maintains industrial primacy. The Neighbourhood Centre and other non-industrial activities are limited in scale and intended principally to support the Development and its workforce rather than establish a competing metropolitan or town centre. The Project is therefore not expected to undermine the role or vitality of existing centres or surrounding rural settlements.
<i>D. The development addresses an identified housing type, tenure or price-point need.</i>	Not applicable. The Project is an industrial development and does not provide housing.



WRP Objective/Policy assessment	
Obj/Pol Provision	Comments
Water Module: Water Resources - Objective	
Objective 3.A.1: <i>Fish Passage The passage of fish is maintained, or is improved, by instream structures, except where it is desirable to prevent the passage of some fish species in order to protect desired fish species, their life stages, or their habitats.</i>	The Project includes new and replacement structures within the Mangaheka and Te Otamanui Streams, including culvert crossings and associated stream works. Existing culverts within the Site are generally in poor condition and some currently restrict fish passage. The proposed replacement culverts will be designed and installed to maintain fish passage in accordance with the NES-F and relevant fish passage guidance. The EclA assesses the effect of the proposed culvert replacement on fish passage as positive following mitigation, reflecting the improvement in connectivity compared with the existing environment. The Mangaheka Stream Enhancement Plan similarly requires the proposed Mangaheka culverts to provide for upstream and downstream fish passage, including appropriate embedment, bed substrate and hydraulic conditions. Fish passage and continuity of flow will also be maintained during stream works where practicable, together with fish capture and relocation requirements under the Fish Management Plan and Stream Works Management Plan. Accordingly, the Project is considered consistent with Objective 3.A.1.
Policy 3.A.3 – Rivers <i>The loss of river extent and values is avoided, unless the Council is satisfied that:</i> a. <i>there is a functional need for the activity in that location; and</i> b. <i>the effects of the activity are managed by applying the effects management hierarchy.</i>	The Project has sought to avoid the loss of river extent and values where practicable through retention and enhancement of the Mangaheka and Te Otamanui Streams. The Project will nevertheless result in the reclamation of approximately 212 m of Watercourse M13. The EclA identifies M13 as a highly modified intermittent watercourse with low ecological values and applies the effects management hierarchy to the proposed loss. The reclamation is required to enable the integrated development layout and associated earthworks and infrastructure. The EclA identifies that the residual loss of stream extent and ecological values is to be addressed through stream creation and enhancement within the Mangaheka Stream corridor. An Environmental Compensation Ratio assessment identifies approximately 217 m of additional stream length as being required to address the loss, while the proposed Mangaheka Stream works will create approximately 435 m of additional stream length and approximately 870 m² of additional stream habitat.



	The Project will also modify the Mangaheka Stream itself. Those works retain the stream corridor and incorporate a meandering baseflow channel, instream habitat features, riparian planting and a widened flood conveyance corridor. Accordingly, while the Project will result in some unavoidable loss and modification of river extent and values, the effects management hierarchy has been applied and the proposed stream creation and restoration measures are expected to result in a net gain in stream extent and ecological value. The Project is therefore considered generally consistent with Policy 3.A.3.
Objective 3.1.2 <i>The management of water bodies in a way which ensures:</i> <i>a. That people are able to take and use water for their social, economic and cultural wellbeing</i> <i>b. Net improvement of water quality across the Region</i> <i>c. The avoidance of significant adverse effects on aquatic ecosystems</i> <i>d. The characteristics of flow regimes are enhanced where practicable and justified by the ecological benefits.</i> <i>e. The range of uses of water reliant on the characteristics of flow regimes are maintained or enhanced</i> <i>f. The range of reasonably foreseeable uses of ground water and surface water are protected</i> <i>g. Inefficient use of the available ground surface water resources in minimised</i> <i>h. An increase in the extent and quality of the Region's wetlands</i> <i>i. That significant 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 in or on the margins of water bodies are remedied or mitigated</i> <i>j. The cumulative adverse effects on the relationship tangata whenua as Kaitiaki have with water their 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</i> <i>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.</i> <i>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</i>	The Project has been developed within an integrated freshwater, stormwater and groundwater management framework that addresses the effects of urbanisation on surface water, groundwater, freshwater ecology and downstream receiving environments. The Development will result in modification of parts of the existing freshwater environment, including reconstruction of the Mangaheka Stream, reclamation of Watercourse M13, modification of the existing drainage network, stormwater discharges and temporary water-management activities associated with construction. These effects have been assessed through the EclA, SWMP, hydraulic modelling, hydrogeological assessment and supporting management plans. The Project incorporates a comprehensive stormwater treatment and attenuation system comprising source controls, raingardens, vegetated conveyance systems and constructed stormwater wetlands. The stormwater system is designed to manage both water quality and quantity, including attenuation of post-development peak flows and management of erosion effects within downstream receiving environments. The freshwater framework also incorporates substantial restoration and enhancement of the Mangaheka Stream corridor. The existing modified stream will be reconstructed to provide a meandering baseflow channel, increased stream length, instream habitat features, indigenous riparian planting and improved ecological connectivity. The Te Otamanui Stream will be retained and enhanced. The Project will affect habitat used by indigenous freshwater species, including black mudfish habitat within parts of the existing artificial drainage network. Those effects are proposed to be managed through fish capture and relocation, dedicated black mudfish habitat creation, stream restoration, riparian planting and improved fish passage. Groundwater and surface-water interactions associated with construction and development have also been assessed, with monitoring and management measures proposed where required to manage effects on groundwater levels, neighbouring users and connected freshwater environments.



m. <i>Ground water quality is maintained or enhanced and ground water takes managed to ensure sustainable yield</i> n. <i>Shallow ground water takes do not adversely affect values for which any potentially affected surface water body is managed</i> o. <i>Concentrations of contaminants leaching from land use activities and non-point source discharges to shallow ground water and surface waters do not reach levels that present significant risks to human health or aquatic ecosystems</i> p. <i>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.</i> q. <i>Refer to Objective 3.A.1.</i>	The Project recognises tangata whenua values associated with freshwater through the TWWG, CIA and ongoing mana whenua involvement in implementation and environmental management. While the Project will result in substantial modification of the existing freshwater environment, the proposed stormwater treatment, stream restoration, habitat creation and management measures are intended to avoid significant adverse effects on aquatic ecosystems and improve freshwater outcomes within the Site and wider receiving environment over time. Overall, the Project is considered generally consistent with Objective 3.1.2.
Management of Water Bodies	
Policy 3.2.3 Policy 1: Management of Water Bodies <i>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:</i> a. <i>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.</i> b. <i>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.</i> c. <i>Enhancing the quality of degraded waterbodies.</i> d. <i>Providing for the mitigation and remediation of adverse effects in accordance with Section 1.3.3 of the Waikato Regional Policy Statement.</i> e. <i>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.</i>	The Project has been designed to enable urban development while managing the resulting effects on surface water quality and freshwater values. The existing freshwater environment within the Site is highly modified, reflecting historic drainage, channel modification and pastoral land use. The proposed stormwater framework incorporates source controls, raingardens, vegetated conveyance systems and constructed stormwater wetlands to manage contaminants generated by future industrial development and avoid cumulative degradation of downstream water quality. The Project also provides for substantial restoration of the Mangaheka Stream corridor, including stream reconstruction, increased stream length, indigenous riparian planting and instream habitat enhancement. These measures, together with black mudfish habitat creation and improved fish passage, are intended to improve the ecological condition and resilience of the freshwater environment over time. Accordingly, the Project enables the use and development of the Site while incorporating measures intended to maintain and improve water quality and freshwater values, and is considered generally consistent with Policy 1.
Policy 2: Managing Degraded Water Bodies	The Mangaheka Stream and wider drainage network within the Site are highly modified by historic drainage, channelisation, vegetation clearance and pastoral land use.



<i>Enhance the quality of degraded water through improved management of activities that affect water bodies so that:</i> <i>a. For activities controlled by rules in the Plan:</i> <i>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</i> <i>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</i> <i>iii. water allocation takes into account the additional adverse effect of reduced flow in degraded waters on aquatic ecosystems and human uses and values.</i> <i>b. For activities covered by non-regulatory methods in the Plan, promote:</i> <i>i. land management methods that reduce non-point source discharges</i> <i>ii. riparian management that mitigates the effect of non-point source discharges on water bodies.</i>	The Project does not rely on that existing condition as justification for further degradation. The stormwater management framework has been designed to manage contaminant loads from future urban development through a treatment-train approach, while the Mangaheka Stream corridor will be restored and enhanced through stream reconstruction, riparian planting and habitat improvement. Construction effects will also be managed through erosion and sediment controls and associated environmental management requirements to minimise sediment and contaminant discharges to receiving waters. These measures are intended to avoid further degradation of water quality and to improve the condition and ecological function of the existing modified freshwater environment over time. The Project is therefore considered generally consistent with Policy 2.
Policy 3: Natural Character <i>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:</i> <i>a. Diversity and composition of aquatic and riparian habitat.</i> <i>b. Topography and physical composition of river and lake beds and the course of the river.</i> <i>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.</i> <i>d. Any significant natural features of the lakes and rivers and their margins.</i>	The natural character of the freshwater environments within the Site has been substantially modified through historical drainage, channelisation, vegetation clearance and pastoral land use. The Project will result in further physical modification of parts of that environment, including reconstruction of the Mangaheka Stream, reclamation of Watercourse M13 and installation of culverts and stormwater infrastructure. The design has considered aquatic and riparian habitat, stream form, hydraulic processes and the existing modified character of the waterways. In particular, the Mangaheka Stream will be reconstructed as a more naturalised meandering channel with varied instream habitat, indigenous riparian planting and a wider vegetated corridor, while flood conveyance and sediment transport functions are retained. Accordingly, while physical modification will occur, the Project provides substantial opportunities to restore and enhance natural elements and ecological function within the existing modified freshwater environment and is considered generally consistent with Policy 3.



Policy 4: Waikato Region Surface Water Class <i>Enable the use of all surface water bodies in the Region, provided that:</i> <i>Any significant adverse effects on existing aquatic ecosystems are avoided, remedied or mitigated.</i> <i>Intake structures are designed to minimise fish entrapment.</i> <i>Any conspicuous change in visual colour or clarity is avoided, remedied or mitigated.</i> <i>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).</i> <i>The water body is not tainted or contaminated to the extent that it is unsuitable for irrigation or stock watering.</i>	The Project incorporates measures to ensure that use and development of surface water bodies does not result in significant adverse effects on aquatic ecosystems or unacceptable deterioration in receiving-water quality. Operational stormwater will be managed through an integrated treatment train comprising source controls, raingardens, vegetated conveyance systems and constructed stormwater wetlands. Controls are also proposed for higher-risk industrial activities to prevent contaminants entering the public stormwater network. Construction discharges will be managed through erosion and sediment controls and associated management plans. The stormwater and stream design also incorporates erosion protection, flow attenuation and monitoring to manage effects on downstream receiving environments. Freshwater ecological effects are addressed through stream restoration, riparian planting, black mudfish habitat creation, fish salvage and relocation and maintenance or improvement of fish passage. On that basis, the Project is considered generally consistent with the purpose of the Waikato Region Surface Water Class and Policy 4.
Water Takes – Objective	
Objective 3.3.2 <i>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</i> <i>The availability of water to meet the existing and the reasonably justified and foreseeable future domestic or municipal supply requirements of individuals and communities and the reasonable needs for an individual's animal drinking water requirements.</i> <i>The recognition of the significant community benefits that derive from domestic or municipal supply takes.</i> <i>The efficient allocation and the efficient use of water</i> <i>No further allocation of water that exceeds the primary allocation in Table 3-5 that reduced the generation of electricity from renewable energy sources.</i> <i>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 agricultural, perishable food processing and industry</i> <i>The continued availability of water for cooling of the Huntly Power Station</i>	The Project requires temporary surface water and groundwater takes for construction dewatering associated with excavations, service trenches and other below-ground works. Groundwater is expected to be encountered at shallow depth across the low-lying parts of the Site, and localised dewatering using sump pumps or wellpoint systems may therefore be required during construction. The proposed takes are temporary and construction-related rather than consumptive water-supply takes. The potential effects of dewatering, including groundwater drawdown, effects on connected surface water environments, neighbouring users and settlement risk, have been assessed through the Hydrogeological Assessment and supporting geotechnical investigations. The proposed consent conditions limit the groundwater take to wellpoint dewatering and the surface water take to water intercepted within trenches and excavations. They also provide for measurement and reporting of water taken and review of the authorised volumes where necessary. The takes will therefore occur only to the extent required to facilitate construction and will be subject to monitoring and management measures intended to avoid significant adverse effects on groundwater and surface water resources. Accordingly, the Project is considered generally consistent with Objective 3.3.2.



<i>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> <i>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</i> <i>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</i> <i>k. Refer to Objective 3.A.1.</i>	
Water Take - Policies	
Policy 4: Establish sustainable yields from Groundwater <i>Establish, set and review sustainable yields from groundwater resources which are to be used when assessing authorised water takes and resource consent applications from aquifers while having particular regard to the following matters:</i> <i>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.</i> <i>b. The recognition of the relationship between tangata whenua with groundwater resources and providing for tangata whenua input in determining their values and interests, and reviewing the sustainable yields for those groundwater resources.</i> <i>c. The protection of groundwater resource from salt intrusion</i> <i>d. The need to ensure that any groundwater discharges into surface waters are not reduced such that there is a resultant significant adverse effect on in-stream uses and values (including wetlands and karst systems) and on other allocated use</i> <i>e. The need to ensure groundwater depletion or dewatering of aquifers does not result in significant adverse effects on resource availability</i> <i>f. The maintenance of groundwater quality in accordance with the policies in Chapter 3.2 of this Plan</i> <i>g. The benefits derived from the take and consumptive use of groundwater for people's social, economic and cultural wellbeing</i>	The Project requires temporary groundwater dewatering associated with excavations and service trenching in areas of shallow groundwater. The Hydrogeological Assessment has considered the potential effects of that dewatering on groundwater levels, surrounding groundwater users, connected surface water environments and settlement. The groundwater take is proposed to be limited to wellpoint spears used for dewatering and will be monitored through continuous measurement and reporting requirements. The consent framework also provides for review of the authorised volume where required. The temporary and localised nature of the take, together with the proposed monitoring and management framework, is intended to ensure that groundwater dewatering does not result in significant adverse effects on resource availability or connected freshwater values. The Project is therefore considered generally consistent with Policy 4.



h. <i>The loss of benefits derived from the generation of electricity that can result from groundwater takes above Karapiro</i> i. <i>The benefits to be derived from the efficient take and use of groundwater for reasonably foreseeable future consumptive uses, and in particular for domestic or municipal supply and the reasonable needs for an individual's animals drinking water</i> j. <i>The maintenance of security of existing, efficient take and use of water and the associated lawfully established infrastructure</i> k. <i>Maintenance of tangata whenua uses and values</i> l. <i>The effects of climate change on groundwater resources</i> m. <i>The avoidance of a reduction in recharge groundwater flows to Geothermal Systems.</i>	
Policy 10: How groundwater takes will be classified <i>The Waikato Regional Council shall manage the taking of groundwater resources in a manner that meets the criteria for establishing Sustainable Yields from groundwater resources listed in Policy 4 by:</i> a. <i>Classifying takes as being authorised without the need for resource consent if such takes:</i> i. <i>Are allowed by s14(3)(b) RMA purposes, except as restricted in part c) of this policy and in any associated rules, or</i> ii. <i>Do not exceed 15 cubic metres per day except as provided for in part d) of this policy and in any associated rules, or</i> iii. <i>Are temporary takes up to 150 cubic metres per day except as provided for in part d) of this policy and in any associated rules; or</i> iv. <i>Are takes for well and aquifer testing up to 2500 cubic metres per day and a pumping duration of less than three days</i> b. <i>Classifying as a controlled activity any take existing at 15 October 2008 that was for the purposes of milk cooling or dairy shed wash down provided the effects of the take are avoided, remedied or mitigated.</i> c. <i>Classifying as a non-qualifying s14(3)(b) take and a discretionary activity any take which was not existing prior to 15 October 2008</i>	The proposed groundwater take is required for temporary construction dewatering where excavations extend below the shallow groundwater table. The take will be undertaken using wellpoint spears and will be limited to the volume necessary to enable construction. The potential effects of the take have been assessed through the Hydrogeological Assessment, including effects on groundwater levels, neighbouring groundwater users, connected surface water bodies and ground settlement. The proposed consent conditions require continuous measurement and reporting of groundwater taken and require dewatering systems and associated excavations to be designed and operated so as to avoid damage to buildings, structures and services on the Site and adjoining properties. The Project also provides for management of groundwater effects through detailed design, construction methodologies and monitoring, with additional mitigation or groundwater controls to be incorporated where required by final hydrogeological modelling. Accordingly, the proposed temporary groundwater take is considered generally consistent with Policy 10.



and would otherwise be allowed under s14(3)(b) of the RMA except that when assessed in combination with all other existing authorised water takes within the same aquifer it exceeds the Sustainable Yield in Table 3-6

- d. Classifying as a discretionary activity any supplementary take or temporary take which might otherwise be a permitted activity when the take, assessed in combination with all other existing authorised water takes within the same aquifer, is for a rate greater than 100 percent of the Sustainable Yield identified in Table 3-6.*
- e. Using Management Levels to indicate when there is increasing demand from an aquifer.*
- f. Classifying as a discretionary activity all applications for domestic or municipal supply takes for groundwater where a water management plan which meets the requirements of Method 8.1.2.2 has been provided.*
- g. Classifying all other applications for takes of groundwater in the following manner:*
 - i. As a discretionary activity, or*
 - ii. As a non-complying activity if a relevant Sustainable Yield is provided in Table 3-6 and the rate of take in combination with all other existing authorised water takes within the same aquifer is greater than the relevant Sustainable Yield value.*
- h. Classifying all new and existing resource consent holders a priority level(s) for the whole or part of the consent to apply when water shortage restrictions occur.*
- i. Notwithstanding Policies a) to h), assessing the nature of hydraulic connection (if any) between groundwater takes and surface water bodies and, if there is such a connection as defined by Policy 12w), having regard to relevant parts of Policy 11 and Policy 12 when making decisions on groundwater takes.*
- j. Including Sustainable Yields by way of a Plan Change when sufficient information is available and when needed to address significant adverse effects of groundwater takes.*
- k. Classifying all applications for groundwater takes for domestic or municipal supply as a non-complying activity where a water*



management plan which meets the requirements of Method 8.1.2.2 has not been provided.	
Water Module: Discharge - Objectives	
Objective 3.5.2 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. ensure 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 Project will result in operational stormwater discharges from the developed industrial area, together with temporary construction-related discharges associated with earthworks, dewatering and stream works. The stormwater management system has been designed as an integrated treatment train comprising source controls, raingardens, vegetated conveyance systems and constructed stormwater wetlands. These measures are intended to manage contaminant loads and stormwater volumes before discharge to the Mangaheka Stream and wider receiving environment. The hydraulic and stormwater assessments also address the potential effects of the discharges on downstream flooding, erosion and receiving-water conditions. The system provides attenuation of post-development peak flows, dedicated conveyance corridors and erosion protection measures, together with monitoring and maintenance requirements. Construction discharges will be managed through erosion and sediment controls and associated construction management requirements to minimise sediment and other contaminants entering surface water. The Project therefore provides an integrated framework for managing the quality and quantity effects of discharges so that they do not result in effects inconsistent with the wider water-management objectives of the Regional Plan. The Project is considered generally consistent with Objective 3.5.2.
Water Module: Discharge - Policies	
Policy 3: Alternatives to direct discharge to water <i>Land-based treatment systems will be promoted where soil types and drainage will allow and where adverse effects are minor or are less than those from a direct discharge to water. If the economic burden of adopting land treatment is unacceptable, provision will be made for a phased introduction of land treatment over an agreed period of time.</i>	The operational stormwater discharges have been assessed through the SWMP and hydraulic modelling and will be managed through a comprehensive treatment, attenuation and conveyance system. The proposed stormwater system is intended to avoid significant adverse effects on receiving-water quality, flooding, erosion and downstream siltation. Post-development peak flows are attenuated through constructed stormwater wetlands and associated storage, while conveyance channels, overland flow paths and the reconstructed Mangaheka Stream corridor provide for safe conveyance of larger events. Water-quality effects will be managed through a treatment-train approach incorporating source controls, raingardens, vegetated conveyance and constructed stormwater wetlands. Construction-phase sediment discharges will be managed through erosion and sediment control measures and associated management plans.



	The receiving environments are not coastal waters, significant natural wetlands or lakes, and the Project incorporates specific freshwater ecological measures including stream restoration, riparian planting, fish-passage improvements and black mudfish habitat creation. Accordingly, the Project is considered generally consistent with Policy 2.
Policy 5: Ground Water <i>Minimise the adverse effects of discharges onto or into land on ground water quality by ensuring that they:</i> <i>do not compromise existing or reasonably foreseeable uses of ground water</i> <i>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</i> <i>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.</i>	Potential effects on groundwater quality have been considered through the hydrogeological and contaminated-land assessments and the Project's stormwater and construction management framework. Operational stormwater will generally be collected and treated through the public stormwater system rather than discharged uncontrolled to land. Construction activities will also be subject to erosion, sediment and contaminant controls, including requirements for the management of potentially contaminated soils and unexpected contamination. These measures are intended to avoid or minimise contaminant migration to groundwater and effects on connected surface-water environments and foreseeable groundwater uses. The Project is therefore considered generally consistent with Policy 5.
Policy 6: Tangata Whenua uses and values <i>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:</i> <i>the mauri of water</i> <i>waahi tapu sites</i> <i>other identified taonga</i>	The relationship of tangata whenua with freshwater has been recognised through engagement undertaken through the TWWG, hui and preparation of the CIA. That engagement has identified cultural values associated with freshwater, the Mangaheka Stream, indigenous species and the wider Waikato River system. These values have informed the stormwater, stream-restoration and ecological framework for the Project. The Project provides for ongoing mana whenua involvement through the proposed Mana Whenua Management Plan, including cultural monitoring and input into environmental management and restoration. The proposed discharge framework therefore recognises tangata whenua values associated with water and provides measures to avoid, remedy or mitigate adverse effects on those values. The Project is considered generally consistent with Policy 6.
Policy 7: Stormwater discharges <i>Encourage at-source management and treatment of stormwater discharges to reduce water quality and water quantity effects of discharges on receiving waters.</i>	The Project adopts an at-source and treatment-train approach to stormwater management. Source controls will be applied to higher-risk industrial activities to manage contaminants before they enter the public stormwater system. Stormwater will then be conveyed and



	treated through a combination of raingardens, vegetated conveyance systems and constructed stormwater wetlands before discharge to the receiving environment. The system also addresses stormwater quantity through attenuation storage, dedicated conveyance corridors and overland flow paths, with hydraulic modelling used to assess downstream flood and erosion effects. The stormwater framework therefore responds directly to Policy 7 by managing both water-quality and water-quantity effects at source and prior to discharge to receiving waters. The Project is considered consistent with Policy 7.
Water Module: Damming and Diverting - Objectives	
Objective 3.6.2 <i>Damming and/or diverting of water undertaken in a manner that:</i> <i>Does not have adverse effects that are inconsistent with the water management objectives in Section 3.1.2.</i> <i>Does not have adverse effects that are inconsistent with the river and lake bed structures objectives in Section 4.2.2.</i> <i>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.</i> <i>Results in no increase in the adverse effects of flooding or land instability hazards.</i> <i>Results in no loss of existing aquatic habitats as a consequence of channelisation of rivers.</i> <i>Increases the use of off-stream dams for water supply purposes as an alternative to dams in perennial streams.</i> <i>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.</i> <i>Refer to Objective 3.A.1.</i>	The Project involves temporary and permanent diversion of surface water associated with stream reconstruction, culvert installation, stormwater infrastructure and construction works within the Mangaheka and Te Otamanui Stream catchments. The potential effects of those activities have been assessed through the EclA, SWMP, hydraulic modelling and supporting stream works and fish management plans. The Project has been designed so that damming and diversion activities do not result in unacceptable increases in flooding or erosion on neighbouring or downstream properties and do not compromise the wider water-management outcomes sought by the Regional Plan. Fish passage will be maintained during and following the works where practicable. Permanent culverts will be designed to maintain fish passage, while temporary stream diversions will be managed through the Stream Works Management Plan and Fish Management Plan, including fish salvage and relocation where required. The Project will also modify existing aquatic habitat, particularly through reconstruction of the Mangaheka Stream and reclamation of Watercourse M13. Those effects are proposed to be addressed through stream creation and enhancement, riparian planting, instream habitat creation and dedicated black mudfish habitat. Overall, the proposed damming and diversion activities are considered generally consistent with Objective 3.6.2.
Water Module: Damming and Diverting – Policies	
Policy 2: Damming and Diverting of water in perennial water bodies <i>Manage the damming and diverting of water in perennial water bodies in a manner that ensures:</i>	The Project involves damming and diversion activities associated with works in and around the Mangaheka and Te Otamanui Streams, including temporary diversions required to enable stream reconstruction and culvert installation.



a. <i>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.</i> b. <i>Adverse effects of the use, erection, reconstruction, placement, alteration or extension of structures on the beds of lakes or rivers associated with the activity that are inconsistent with the policies in Section 4.2.3 are avoided as far as practicable and otherwise remedied or mitigated.</i> c. <i>That the activity will not obstruct fish passage of trout and/or indigenous fish to complete their lifecycle where it would otherwise occur in the absence of unnatural barriers.</i> d. <i>The adverse effects of flooding or erosion on neighbouring properties are avoided, remedied or mitigated.</i> e. <i>Changes in the catchment and sediment transport processes have no significant adverse effects on water quality, habitat and flow regimes in perennial streams.</i> f. <i>Any significant adverse effect on cave systems are avoided or mitigated.</i> g. <i>Any adverse effects on wetlands²⁸ 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</i>	These activities have been designed and will be managed to avoid adverse effects on water quality, aquatic habitat, flow regimes and neighbouring properties as far as practicable, and otherwise to remedy or mitigate those effects. Temporary diversions will be constructed and operated in accordance with the Stream Works Management Plan, including requirements for maintaining flow, erosion and sediment control, stabilisation and reinstatement. Fish salvage and relocation will be undertaken where required before affected reaches are isolated or dewatered. Permanent stream crossings and culverts will be designed to maintain fish passage. The wider stream design also incorporates naturalised channel form, instream habitat and riparian planting to improve freshwater connectivity and ecological function. Hydraulic modelling has assessed the effects of the proposed drainage and stream modifications on flood levels, flow paths and velocities, and the design incorporates attenuation and conveyance measures intended to avoid or mitigate adverse flooding and erosion effects on adjoining and downstream properties. The Project is therefore considered generally consistent with Policy 2.
Policy 3: Tangata Whenua uses and values <i>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:</i> a. <i>The mauri of water</i> b. <i>Waahi tapu sites</i> c. <i>Other identified taonga</i>	The Project has been developed through engagement with tangata whenua, including through the TWWG, hui and preparation of the CIA. Freshwater values associated with the Mangaheka Stream, indigenous species and the wider receiving environment have informed the stream restoration, fish-management and ecological framework for the Project. The proposed Mana Whenua Management Plan will also provide for ongoing mana whenua involvement during implementation, including cultural monitoring and input into stream works and ecological restoration. The Project therefore recognises and provides for the relationship of tangata whenua as kaitiaki with freshwater and provides measures to avoid, remedy or mitigate adverse effects on identified cultural values. The Project is considered generally consistent with Policy 3.



Drilling - Objective	
Objective 3.8.2: Drilling activities undertake 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.	Drilling associated with the Project is principally related to geotechnical and hydrogeological investigation and, where required, construction activities below the groundwater table. The potential effects of drilling are limited and can be appropriately managed through standard drilling, sealing and abandonment practices. In particular, drilling methods will be required to avoid contamination of groundwater and surface water, prevent hydraulic connections between previously isolated aquifers, and avoid significant loss of aquifer pressure or groundwater level. Drilling fluids and other materials associated with drilling will be managed so that they do not result in significant adverse effects on soil or water quality. Where holes penetrate the groundwater table, they will be appropriately constructed, managed and sealed or abandoned following completion. The Project is not located within a geothermal system and does not involve geothermal drilling. Accordingly, the drilling activities associated with the Project are considered consistent with Objective 3.8.2.
Drilling – Policies	
Policy 1: Effects of drilling activities <i>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:</i> 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.	Drilling associated with the Project will be undertaken using appropriate industry-standard methods to manage effects on groundwater, surface water and soils. Where drilling extends below the groundwater table, drill holes will be constructed, managed and subsequently sealed or abandoned so that they do not create pathways for contaminants or hydraulic connections between separate groundwater units. Drilling fluids and other substances will also be managed to avoid contamination of groundwater, surface water and soil. The archaeological and cultural management framework for the Project also provides for the management of any previously unidentified wāhi tapu, archaeological material or other sites of significance encountered during works. On that basis, the Project is considered consistent with Policy 1.
River and Lake Bed Structures - Objective	
Objective 4.2.2: <i>The use, erection, reconstruction, placement, alteration, extension, removal or demolition of structures in, on, under or over the beds of rivers and lakes managed in a manner that:</i>	The Project includes new structures within the beds of rivers, principally culverts associated with road crossings and infrastructure connections across the Mangaheka and Te Otamanui Streams. The location, design and construction of those structures have been informed by the EclA, hydraulic modelling, SWMP and supporting stream works and fish management plans. The



a. produces a net reduction in the adverse effects of the destabilisation of river and lake beds b. does not have adverse effects on water quality, flow regimes, aquatic ecosystems and wetlands that are inconsistent with Water Management Objective 3.1.2 c. does not obstruct fish passage for trout and indigenous fish to complete their life cycle d. preserves the natural character of river and lake beds and their margins and protects them from inappropriate use and development e. there is no increase in the adverse effects of flooding f. provides for navigation of water bodies where appropriate g. remedies or mitigates adverse effects of existing structures on the relationship tangata whenua as kaitiaki have with identified taonga, such as waahi tapu, native flora and fauna and access to their customary fisheries h. avoids significant adverse effects of new structures on the relationship tangata whenua as kaitiaki have with identified taonga, such as waahi tapu, native flora and fauna and access to their customary fisheries i. remedies or mitigates cumulative adverse effects on the relationship tangata whenua as kaitiaki have with their identified taonga, such as waahi tapu, native flora and fauna and access to their customary fisheries j. maintains existing legal public access to and along river and lake beds and their margins. k. Refer to Objective 3.A.1.	structures will be designed and constructed to avoid significant destabilisation of river beds and banks and to avoid effects on water quality, flow regimes and aquatic ecosystems that are inconsistent with the Water Module. Fish passage is a particular consideration for the proposed culverts. Existing structures within the Site currently restrict fish passage in some locations, and replacement culverts will be designed to maintain or improve passage for indigenous fish, including through appropriate embedment, bed substrate and hydraulic conditions. Hydraulic modelling has assessed the effects of the proposed structures and associated stream works on flood levels and flow behaviour. The proposed design is intended to ensure that the structures do not increase adverse flooding effects on neighbouring or downstream properties. The affected streams are already highly modified, but the design has nevertheless sought to preserve and enhance natural character through integration of structures with the reconstructed stream channels, riparian planting and habitat restoration. Tangata whenua values associated with freshwater and indigenous species have informed the Project through engagement, the CIA and the proposed Mana Whenua Management Plan. Existing legal public access is not materially affected. Overall, the proposed structures are considered generally consistent with Objective 4.2.2.
River and Lake Bed Structures - Policies	
Policy 2: Management of structures Control through resource consents the use, erection, reconstruction, placement, alteration, extension, removal and demolition of those structures in, on, under or over river and lake beds that: a. cause or accentuate the significant adverse effects of destabilisation of the beds and the banks of rivers and lakes, or	The proposed culverts and other structures have been assessed for their potential effects on bed and bank stability, water quality, flow regimes, aquatic ecosystems, fish passage, natural character and flooding. The structures will be designed to avoid causing or accentuating significant bed or bank instability and to avoid adverse effects on water quality, flows and aquatic ecosystems that are inconsistent with the Water Module. Culverts will be designed to maintain or improve fish passage, including through appropriate embedment and provision of suitable bed substrate and hydraulic conditions.



b. <i>have the potential to cause significant adverse effects on water quality, flow regimes and aquatic ecosystems in a manner that is inconsistent with the policies in Section 3.2.3 of this Plan, or</i> c. <i>occur in natural state areas as identified in the Water Management Class Maps of this Plan, or</i> d. <i>obstruct fish passage for trout and indigenous fish, or</i> e. <i>may cause significant adverse effects on the natural character of river and lake beds (including caves), or</i> f. <i>increase the adverse effects of flooding on neighbouring properties, or</i> g. <i>cause obstruction to navigation, or</i> h. <i>cause significant adverse effects on the relationship tangata whenua as kaitiaki have with river and lake beds, or</i> i. <i>cause cumulative adverse effects</i> j. <i>obstruct existing legal public access.</i>	Where existing structures currently restrict passage, replacement provides an opportunity to improve freshwater connectivity. Hydraulic modelling has considered the structures as part of the wider stream and drainage network and confirms that the design can manage flood conveyance without increasing adverse flooding effects on neighbouring properties. Construction effects will be managed through the Stream Works Management Plan, Fish Management Plan and erosion and sediment control requirements. The affected waterways are already highly modified, but the structures will also be integrated with the wider stream restoration and riparian planting framework to manage effects on natural character. The Project has also been informed by engagement with tangata whenua, and measures are proposed to manage effects on freshwater, indigenous fauna and associated cultural values. Accordingly, the Project is considered generally consistent with Policy 2.
Policy 5: Natural character <i>Recognise and, where relevant, provide for the following characteristics when considering the preservation of the natural character of river and lake beds and their margins and the protection of them from the inappropriate use, erection, reconstruction, placement, extension, removal or demolition of structures in, on, under or over river and lake beds:</i> a. <i>Diversity and composition of aquatic and riparian habitat.</i> b. <i>Topography and physical composition of river and lake beds and the course of the river.</i> c. <i>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.</i> d. <i>Any significant natural features of the bed or banks.</i>	The streams affected by the proposed structures are already substantially modified through historical drainage, channelisation, vegetation clearance and surrounding pastoral land use. The design of the proposed structures has nevertheless had regard to the diversity and composition of aquatic and riparian habitat, stream-bed form and channel alignment, natural flow characteristics and hydraulic processes. Culverts will be integrated with the proposed stream form and will incorporate measures to maintain bed continuity and fish passage. The wider Project also provides substantial restoration of the Mangaheka Stream corridor, including a more naturalised meandering channel, instream habitat and indigenous riparian planting. Accordingly, while new structures will introduce additional built elements within the stream environment, they have been designed in the context of the existing modified environment and the wider stream restoration framework. The Project is therefore considered generally consistent with Policy 5.
Policy 6: Positive benefits of resource use <i>Recognise the positive benefits that can arise from the use, development and protection of river and lake beds whilst ensuring that any adverse effects are controlled in accordance with Policy 2 of this Chapter.</i>	The proposed structures are required to provide transport and infrastructure connections across the Development and enable the efficient use and development of the Site. Those positive social and economic benefits are recognised alongside the environmental effects of the structures, which are proposed to be controlled in accordance with Policy 2. The Project is considered generally consistent with Policy 6.



River and Lake Bed Disturbances – Objective

Objective 4.3.2:

Physical alteration to the beds or banks of waterways, the deliberate introduction of vegetation to the beds or banks of rivers or lakes, the destruction or removal of vegetation from the beds and banks of rivers and lakes, and the access of livestock to the banks and beds of rivers and lakes managed so that:

- a. *loss of adjacent land is avoided*
- b. *adverse effects on aquatic habitat, downstream water uses and on the passage of trout and indigenous fish of elevated suspended solids and temperature levels in surface water bodies are not inconsistent with objectives in Chapter 3.1*
- c. *accelerated infilling of estuaries, harbours and wetlands³³ that are areas of significant indigenous vegetation and/or significant habitats of indigenous fauna is avoided, excluding structures designed to trap sediment*
- d. *bank stability and channel stability is maintained*
- e. *there is no increase in the adverse effects of flooding*
- f. *significant adverse effects on the relationship tangata whenua as kaitiaki have with their identified taonga such as waahi tapu, native flora and fauna and access to their customary fisheries are avoided*
- g. *cumulative adverse effects on the relationship tangata whenua as kaitiaki have with their identified taonga such as waahi tapu, native flora and fauna and access to their customary fisheries are remedied or mitigated*
- h. *significant adverse effects on the natural character of the margins of wetlands, lakes and rivers are avoided*
- i. *there is no introduction of any plant pest identified in the Waikato Regional Pest Management Strategy*
- j. *competition by introduced vegetation to existent desirable plant species is avoided*
- k. *obstruction of river channels by introduced vegetation is avoided*
- l. *faecal contamination does not have adverse effects that are inconsistent with objectives in Chapter 3.1*

The Project involves physical alteration of stream beds and banks through reconstruction of the Mangaheka Stream, reclamation of Watercourse M13, excavation, channel reshaping, vegetation clearance and associated construction activities.

The works have been assessed through the EclA, hydraulic modelling, SWMP and supporting stream works and fish management plans. Construction methodologies and erosion and sediment controls will be used to avoid loss of adjoining land and manage suspended sediment and other effects on aquatic habitat and downstream water uses.

Stream design and construction measures will maintain bed and bank stability, while hydraulic modelling has assessed changes to flood levels, velocities and flow paths to ensure that the works do not increase adverse flooding effects.

Fish passage will be maintained or improved where relevant, and fish salvage and relocation will be undertaken before affected reaches are isolated or disturbed.

The Project will result in permanent loss and modification of some existing freshwater habitat, including reclamation of Watercourse M13. Those effects are proposed to be managed through the effects management hierarchy, including additional stream creation, Mangaheka Stream restoration, riparian planting, instream habitat enhancement and dedicated black mudfish habitat creation.

Vegetation establishment will use appropriate species and will be designed to avoid plant pest introduction, obstruction of channels and adverse hydraulic effects.

Tangata whenua values associated with freshwater and indigenous species have informed the Project through engagement, the CIA and the proposed Mana Whenua Management Plan.

Overall, the proposed river-bed disturbances are considered generally consistent with Objective 4.3.2.



m. damage to lawfully established structures and drainage districts and river control scheme areas is avoided n. existing legal public access to and along river and lake beds and their margins is maintained, where appropriate. o. Refer to Objective 3.A.1.	
River and Lake Bed Disturbances - Policies	
Policy 1: Bed and bank alterations and extractions of sand, gravel and other bed material Ensure that the physical alteration of the river bed and banks including the extraction of sand, gravel and other material in, on or under the bed of a river or lake: a. does not result in loss of adjacent land, or b. does not degrade water quality and aquatic ecosystems in a manner that is inconsistent with policies in Section 3.2.3, or c. does not result in the accelerated infilling of estuaries, harbours and wetlands³⁴ that are areas of significant indigenous vegetation and/or significant habitats of indigenous fauna, or d. does not obstruct fish passage, or e. does not significantly adversely affect bed and channel stability, except in those instances where the disturbance will provide environmental benefits, or f. does not result in an increase in the adverse effects of flooding on neighbouring properties, or g. does not affect the integrity of existing lawfully established structures or drainage districts and river control scheme areas, or h. avoids significant adverse effects on the relationship tangata whenua as kaitiaki have with river and lake beds, or i. does not degrade natural character in a manner that is inconsistent with Policy 6 in Section 4.3.3 j. does not obstruct existing legal public access where appropriate.	The Project involves physical alteration of stream beds and banks through reconstruction of the Mangaheka Stream, reclamation of Watercourse M13 and associated excavation and channel works. These activities have been assessed through the EclA, hydraulic modelling and supporting stream works and fish management plans. The works are proposed to be undertaken so that they do not result in loss of adjoining land, unacceptable degradation of water quality or aquatic habitat, obstruction of fish passage, significant bed or bank instability, or increased adverse flooding effects on neighbouring properties. Construction effects will be managed through erosion and sediment controls, temporary diversion and dewatering methodologies, fish salvage and relocation where required, and stabilisation and revegetation following completion of works. The reclamation of Watercourse M13 will result in permanent loss of an existing stream reach. That effect has been assessed through the effects management hierarchy and is proposed to be addressed through stream creation and enhancement within the Mangaheka Stream corridor. The Mangaheka Stream reconstruction will retain and enhance the principal stream corridor through creation of a more naturalised channel form, increased stream length, instream habitat and indigenous riparian planting. The Project has also been informed by engagement with tangata whenua and incorporates measures to recognise and manage effects on freshwater and cultural values. Overall, the proposed bed and bank alterations are considered generally consistent with Policy 1.
Policy 2: Introduction of vegetation Ensure that the deliberate introduction or planting of plants in, on or under the bed or bank of any river or lake and the ongoing maintenance of such plantings:	The Project includes indigenous planting within reconstructed stream margins and the Mangaheka Stream corridor. Planting will use appropriate species and will be designed and managed so that it does not introduce plant pests, obstruct stream channels, materially increase flood levels, redirect flows causing erosion or displace desirable existing vegetation.



a. does not result in the introduction of aquatic plant pests as noted in Waikato Regional Council's Regional Pest Management Strategy, or b. does not result in an increase in the adverse effects of flooding on neighbouring properties, or c. does not cause or accentuate bed and bank erosion, or d. does not overgrow, invade, smother, replace, or damage desirable species* already present in areas adjacent to, and downstream from, where the plants are introduced.	The planting is expected to improve riparian habitat, shading, bank stability and ecological connectivity. The Project is therefore considered consistent with Policy 2.
Policy 6: Natural character Recognise, and where relevant provide for, the following characteristics when considering the preservation of the natural character of river and lake beds and their margins and the protection of them from the inappropriate disturbance of river and lake beds: 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 bed or banks.	The natural character of the affected streams is already substantially modified through historical drainage, channelisation, vegetation clearance and pastoral land use. The proposed bed disturbances have nevertheless been designed having regard to aquatic and riparian habitat, stream-bed form and channel alignment, natural flow characteristics and hydraulic processes. In particular, the Mangaheka Stream will be reconstructed with a more naturalised meandering channel, varied instream habitat and indigenous riparian planting, while retaining its flood-conveyance and sediment-transport functions. While the Project will result in further physical alteration of parts of the freshwater environment, the wider restoration framework provides substantial opportunities to restore and enhance natural elements and ecological function. The Project is therefore considered generally consistent with Policy 6.
Policy 7: Positive Benefits of resource use Recognise the positive benefits that can arise from the use, development and protection of river and lake beds whilst ensuring that any adverse effects are controlled in accordance with Policies 1 and 2 of this Chapter.	The proposed stream-bed disturbances are required to enable the integrated development of the Site, including the transport, stormwater and infrastructure network, while also facilitating restoration and enhancement of the Mangaheka Stream corridor. The works therefore provide social and economic benefits associated with the proposed industrial development together with environmental benefits arising from stream restoration, habitat creation and riparian enhancement. Those benefits are recognised alongside the adverse effects of bed disturbance, which are proposed to be managed in accordance with the preceding policies. The Project is considered generally consistent with Policy 7.
Land and Soil: Accelerated Erosion - Objectives	
Objective 5.1.2 A net reduction of accelerated erosion across the Region so that: a. soil productivity, versatility and capability is maintained	The Project involves substantial bulk earthworks, road construction, infrastructure installation and stream works which have the potential to cause accelerated erosion and sediment discharges during construction.



b. <i>there are no adverse effects on water quality, aquatic ecosystems and wetlands that are inconsistent with Water Management Objective 3.1.2</i> c. <i>there is no increase in the adverse effects of flooding or land instability hazards</i> d. <i>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</i> e. <i>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</i> f. <i>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.</i> g. <i>significant adverse effects on natural character and ecological values associated with land and the coastal environment including dune systems is avoided</i> h. <i>there are no adverse effects on air quality that are inconsistent with Air Quality Objective 6.1.2, Objectives 2 and 3</i> i. <i>damage to property and infrastructure is avoided</i> <i>in particular in High Risk Erosion Areas together with:</i> i. <i>Catchments of estuaries that are areas of significant conservation value on the Coromandel Peninsula</i> ii. <i>Karst and cave systems.</i>	The potential effects of those activities have been assessed through the earthworks, geotechnical, stormwater and freshwater assessments. Construction will be undertaken in accordance with erosion and sediment control measures and associated management plans designed to minimise exposed areas, manage clean and dirty water separately, stabilise completed works and reduce sediment discharges to downstream receiving environments. Particular attention will be required where earthworks occur adjacent to streams and drainage channels, where accelerated erosion could affect water quality, aquatic habitat, bank stability and downstream sedimentation. The earthworks and stormwater framework also manages surface-water flows so that soil disturbance does not increase adverse flooding or land-instability effects or cause damage to adjoining property and infrastructure. Effects on freshwater ecological and cultural values will be managed through the wider stream works, fish management, erosion and sediment control and mana whenua framework. While the Project will result in extensive disturbance of the existing soil resource, the proposed construction controls are intended to minimise accelerated erosion and associated off-site effects during earthworks. The Project is therefore considered generally consistent with Objective 5.1.2.
Land and Soil: Accelerated Erosion - Policies	
<i>Policy 1 – Managing activities that cause or have the potential to cause accelerated erosion and encouraging appropriate land management practices</i> <i>Through permitted activities and non-regulatory methods manage activities that cause or have the potential to cause accelerated erosion, with particular regard to:</i> a. <i>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</i>	The Project involves activities with the potential to cause accelerated erosion, including bulk earthworks, road construction, infrastructure installation, vegetation clearance and works adjacent to watercourses. Those activities will be managed through an integrated erosion and sediment control framework, including staged earthworks, clean-water diversion, sediment-retention devices, stabilisation of completed areas and monitoring and maintenance requirements. Particular regard has been given to the potential for sediment discharges to affect downstream water quality and aquatic ecosystems, the erosion susceptibility of disturbed soils, effects on flooding, natural character and freshwater margins, and the potential for damage to adjoining property and infrastructure.



b. <i>the risk of downstream sedimentation leading to accelerated infilling of lakes, estuaries, artificial watercourses, rivers, wetlands and caves</i> c. <i>the erosion potential of soil when it is disturbed or vegetation is cleared</i> d. <i>the potential to increase the adverse effects of flooding</i> e. <i>the potential to adversely affect waahi tapu and archaeological sites or other identified sites of importance to tangata whenua as Kaitiaki</i> f. <i>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 fauna²⁸</i> g. <i>the potential to compromise air quality objectives as identified in Module 6 Air</i> h. <i>the potential to damage property and infrastructure.</i>	Works adjacent to streams will also be coordinated with the Stream Works Management Plan and Fish Management Plan, while cultural and archaeological discovery protocols will apply where relevant. The proposed management framework is intended to minimise accelerated erosion and associated off-site sediment effects during construction. The Project is therefore considered generally consistent with Policy 1.
Land and Soil: Contaminated land - Objectives	
5.3.2 Objective <i>Discharges of contaminants from contaminated land shall be managed so that they:</i> a. <i>do not present significant risk⁷⁰ of chronic or acute toxic effects on human health, flora or fauna due to the contamination of soil and ground or surface water</i> b. <i>do not have adverse effects on water quality or aquatic ecosystems that are inconsistent with the water management objectives in Section 3.1.2</i> c. <i>there are no adverse effects on air quality that are inconsistent with air quality objectives in Section 6.1.2</i> d. <i>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</i> e. <i>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.</i>	The Project has been informed by a combined Preliminary and Detailed Site Investigation (PSI/DSI) which assessed historical and current land uses, identified potential HAIL activities and investigated the nature and extent of contamination across the Site. The investigation identified localised elevated concentrations of heavy metals, hydrocarbons and asbestos associated with historical rural activities and buildings. However, contaminant concentrations do not exceed the applicable soil contaminant standards for the proposed commercial/industrial land use, and the PSI/DSI concludes that soils across the Site do not meet the definition of contaminated land under the WRP. Soils are considered highly unlikely to pose a risk to human health and are generally suitable to remain on-site. Soil disturbance will nevertheless occur within discrete areas identified as HAIL pieces of land. Those works will be managed through a Contamination Site Management Plan, including procedures for soil disturbance, stockpiling, segregation, unexpected discoveries and off-site disposal. Soils that exceed cleanfill acceptance criteria will be directed to an appropriately authorised receiving facility. These measures will minimise the potential for mobilisation or discharge of contaminants during earthworks and protect human health, ecological receptors and surface and groundwater quality. Accordingly, the Project is considered generally consistent with Objective 5.3.2.



Land and Soil: Contaminated land - Policies

Policy 5 – Other potentially contaminated land

Ensure that resource users are aware of the risk associated with contaminated land and the steps required to manage these risks.

The Project has been informed by a combined PSI/DSI which identifies the historical activities with the potential to have resulted in soil contamination and confirms the nature and extent of contamination identified across the Site.

Discrete areas associated with historical HAIL activities have been identified, including localised heavy metal enrichment, hydrocarbons and asbestos. While the investigation concludes that soils do not present an unacceptable human health or environmental risk for the proposed industrial land use and the Site does not meet the definition of contaminated land under the WRP, appropriate controls are required during earthworks.

A Contamination Site Management Plan will therefore establish procedures for soil disturbance, stockpiling and segregation, unexpected discoveries, asbestos-containing material and off-site soil disposal. Material that does not meet cleanfill acceptance criteria will be disposed of to an appropriately authorised facility.

The Project therefore demonstrates that the potential contamination risks have been identified and that appropriate measures will be implemented to manage those risks and is considered consistent with Policy 5.



Waikato Conservation Management Strategy 1996

The Waikato Conservation Management Strategy 1996 (CMS) is a statutory conservation planning document prepared under the Conservation Act 1987. The CMS provides objectives for the integrated management and protection of natural and historic resources within the Waikato Conservancy. DOC confirms that the 1996 CMS remains operative for the relevant part of the Waikato Region.

The Project Site is privately owned and is not public conservation land. However, Chapter 8 of the CMS expressly recognises DOC's responsibilities for indigenous freshwater fisheries, freshwater fish habitat and wildlife irrespective of land tenure, and identifies conservation advocacy as an important mechanism for protecting these values on private land. The provisions most relevant to the Project are assessed below.

CMS assessment	
CMS provision	Comments
8.1.1 – General management objectives for protection of natural and historic resources <i>To preserve the health and diversity of existing indigenous terrestrial, freshwater and marine ecosystems, maintain or increase the variety and abundance of indigenous species, and develop an effective partnership between DOC and tangata whenua in protecting and managing indigenous ecosystems and species.</i>	The Project Site is a highly modified rural environment and terrestrial ecological values are generally low. However, the Project affects freshwater habitat used by indigenous fish, including black mudfish, and includes potential habitat for indigenous fauna including lizards and bats. These values have been assessed through the EclA and species-specific investigations and management plans. The Project seeks to manage effects through avoidance where practicable, fish and wildlife management measures, habitat creation and restoration, extensive indigenous planting and ongoing monitoring. Tangata whenua have also been involved through the TWWG, CIA and development of the environmental management framework. While the Project will result in modification and loss of some existing habitat, the proposed measures seek to maintain and enhance indigenous ecological values over time. The Project is therefore considered generally consistent with the management direction in section 8.1.1.
8.2.3 – Significant indigenous vegetation and significant habitats of indigenous fauna <i>To identify and promote the protection of all other areas of significant indigenous vegetation and significant habitats of indigenous fauna.</i>	The Site does not contain significant indigenous terrestrial vegetation and its terrestrial habitat values are generally low. Potential habitat for indigenous fauna nevertheless occurs within shelterbelts, scrub, buildings and other modified habitat. Ecological investigations have considered potential effects on indigenous fauna, including lizards and long-tailed bats. No bats were detected during acoustic monitoring, while targeted lizard surveys did not detect indigenous lizards, although potential copper skink habitat remains. The Project adopts a precautionary approach through species management plans and DOC protocols, including pre-clearance checks and management procedures where protected wildlife is encountered. The Project is considered to respond appropriately to the conservation direction in section 8.2.3.
8.3.1 – Key indigenous freshwater ecosystems and habitats <i>To identify and protect key indigenous freshwater ecosystems and habitats.</i>	The Project affects an already highly modified freshwater environment comprising the Mangaheka Stream and associated artificial and modified drainage channels. The EclA identifies freshwater ecological values within that system, including habitat occupied by black mudfish. The Project has sought to retain and enhance the principal Mangaheka Stream corridor and incorporates substantial restoration through stream reconstruction, increased stream length, instream habitat, riparian planting and improved ecological connectivity. Dedicated black mudfish habitat will also be created. While parts of the existing freshwater system will be modified or lost, the Project incorporates specific restoration, habitat-creation and monitoring measures intended to maintain and enhance



	freshwater ecosystem values over time. This is generally consistent with the conservation direction in section 8.3.1.
8.3.2 – Significant indigenous freshwater ecosystems and habitats of indigenous aquatic fauna <i>To identify and promote the protection of all other areas of significant indigenous freshwater ecosystems and significant habitats of indigenous aquatic fauna.</i>	This objective is directly relevant because parts of the existing drainage network provide habitat for black mudfish, an indigenous freshwater species of conservation significance. The Project will result in loss and modification of some existing habitat. Those effects are proposed to be managed through the effects management hierarchy, including fish salvage and relocation, establishment of dedicated replacement black mudfish habitat before affected habitat is removed, restoration of the Mangaheka Stream corridor and ongoing monitoring and adaptive management. The Project does not rely on the existing modified condition of the drainage network as justification for habitat loss. Rather, the proposed management framework seeks to maintain a viable habitat resource and improve the quality and resilience of freshwater habitat available within the Site. The Project is therefore considered generally consistent with section 8.3.2.
8.3.3 – Native fish and freshwater fish habitat <i>To promote the conservation of native fish and protect areas important for their life cycle, including fish passage, spawning and juvenile rearing areas and general habitat.</i>	This is the CMS provision most directly relevant to the freshwater approvals sought for the Project. The Project will affect habitat occupied by indigenous freshwater fish, including black mudfish, through stream works, reclamation, culvert installation and modification of the existing drainage network. The proposed Fish Management Plan provides for fish salvage and relocation before affected reaches are isolated or disturbed, while dedicated black mudfish habitat will be established to provide replacement habitat. Existing culverts that restrict fish passage will be replaced with structures designed to maintain or improve fish passage, and the Mangaheka Stream restoration will increase stream length and provide improved instream and riparian habitat. These measures directly respond to the CMS direction to conserve native fish, restore fish access and protect freshwater habitat. The Project is therefore considered generally consistent with section 8.3.3.
Freshwater protection and restoration implementation direction under sections 8.3.1–8.3.2 <i>The CMS promotes protection of rivers, streams and wetlands, reduction of pollution and sediment entering freshwater environments, rehabilitation of riparian vegetation and restoration of degraded indigenous habitat.</i>	The Project's freshwater and stormwater framework responds positively to this direction. Operational stormwater will be managed through source controls and a treatment train incorporating raingardens, vegetated conveyance and constructed stormwater wetlands. Construction effects will be managed through erosion and sediment controls. The Mangaheka Stream corridor will be reconstructed and extensively planted with indigenous riparian vegetation, while additional freshwater habitat will be created and monitored. These measures are intended to reduce contaminant and sediment effects and improve the condition, connectivity and resilience of freshwater habitat within the Site.



Waikato District Plan Operative in Part

District Plan Objective/Policy Assessment	
Obj/Pol Provision	Comments
Strategic Direction – Objectives	
SD-O1 – Socio-economic advancement <i>The District has a thriving economy</i>	The Project will make a significant contribution to the economic wellbeing of the Waikato District and wider region through the provision of approximately 123 ha of net developable industrial land adjoining the established Te Rapa industrial area. The Economic Assessment identifies significant demand for additional industrial land within Hamilton and the wider sub-region. The Project will increase the supply and choice of serviced industrial land, support business investment and provide substantial construction and operational employment and economic benefits. Accordingly, the Project is considered consistent with Objective SD-O1.
SD-O2 – Tangata Whenua <i>Tangata whenua's relationships, interests, including commercial interests, and associations with their culture, traditions, ancestral lands, waterbodies, sites, areas and landscapes, and other taonga are recognised and provided for.</i>	The Project recognises and provides for the relationship of tangata whenua with ancestral lands, waterbodies and other taonga through engagement undertaken through the TWWG, hui, preparation of the CIA and the incorporation of cultural values into the development outcome. That engagement has informed the freshwater and ecological restoration framework, including restoration of the Mangaheka Stream corridor, indigenous riparian planting, habitat creation and measures for the management of indigenous freshwater species. The proposed Tangata Whenua Management Plan will provide for ongoing mana whenua involvement during implementation of the Project, including cultural monitoring, cultural protocols and input into environmental management and restoration. Accordingly, the Project is considered consistent with Objective SD-O2.
SD-O5 – Integration of infrastructure and land use <i>New development is integrated with the provision of infrastructure.</i>	The Project represents a comprehensively masterplanned industrial development in which land use and infrastructure provision have been planned together from the outset. The development outcome integrates transport, water supply, wastewater, stormwater, utilities and flood-management infrastructure with the proposed subdivision and land-use pattern. Infrastructure delivery is staged and linked to development capacity and identified infrastructure triggers. The supporting technical assessments establish that the Project is serviceable and identify the interim and ultimate infrastructure required to enable development. The Project has also been developed through engagement with the relevant councils, infrastructure providers and NZTA.



	Accordingly, the Project is considered consistent with Objective SD-O5.
SD-O8 – Highly productive soils <i>High quality soils are protected from urban development, except in areas identified for future growth in the District Plan.</i>	The Project will result in the permanent conversion of land containing high quality and highly productive soils to industrial use. The Site is currently zoned General Rural and the proposed industrial development is not an urban development outcome presently enabled by the operative zoning. Accordingly, the Project does not directly achieve the direction in Objective SD-O8 to protect high quality soils from urban development except where that development occurs within areas identified for future growth in the District Plan. The effects on the productive soil resource are acknowledged and are assessed in greater detail under the NPS-HPL, WRPS and General Rural Zone provisions. Those assessments also recognise the identified industrial land demand, the Site's relationship with the established Te Rapa industrial area and the wider strategic and economic benefits of the Project. The Project is therefore not fully consistent with Objective SD-O8. This tension is a matter to be weighed alongside the broader strategic, economic, infrastructure and environmental considerations relevant to the Project.
SD-O10 – Reverse sensitivity <i>Existing activities and permitted land use and development are protected from reverse sensitivity effects.</i>	The Project is predominantly industrial and has been designed to minimise the potential for new development to constrain existing lawfully established industrial, infrastructure and rural activities. The development outcome provides for appropriate separation, boundary treatment and controls at interfaces with adjoining rural land and recognises the operational requirements of the surrounding strategic transport and infrastructure networks. Sensitive activities are limited within the Development Framework and are subject to controls intended to manage reverse-sensitivity effects and ensure that industrial activities remain the predominant land use. Accordingly, the Project is considered generally consistent with Objective SD-O10.
SD-O13 – Climate change <i>Land use is planned to recognise, and avoid, remedy or mitigate the potential adverse effects of climate change induced weather variability and sea level rise.</i>	The Project has been designed having regard to the potential effects of climate change, particularly increased rainfall intensity and associated flood risk. Climate-change-adjusted rainfall has been incorporated into the hydraulic modelling and stormwater design. The development outcome includes attenuation wetlands, conveyance corridors, overland flow paths, finished platform levels and reconstruction of the Mangaheka Stream corridor to manage future flood and stormwater effects. The Project also incorporates substantial riparian and ecological restoration that will contribute to the resilience of the freshwater and open-space network. Accordingly, the Project is considered consistent with Objective SD-O13.



SD-O14 – Well-functioning urban environment <i>(1) A well-functioning urban environment that enables all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.</i>	The Project will contribute to a well-functioning urban environment by providing approximately 123 ha of additional industrial land adjoining the established Te Rapa industrial area and strategic transport network. The Project responds to identified demand for additional industrial capacity and will provide a range of serviced industrial sites capable of accommodating different business sectors and occupiers. The development outcome integrates land use with transport and three-waters infrastructure and provides walking and cycling connections, provision for future public transport, a Neighbourhood Centre, open space and freshwater and ecological corridors. The Project will therefore increase business land capacity and choice while providing an integrated and infrastructure-supported urban development outcome. Accordingly, the Project is considered generally consistent with Objective SD-O14.
General Rural Zone – Objectives	
GRUZ-O1 – Purpose of the Zone <i>(1) Enable farming activities;</i> <i>(2) Protect high class soils for farming activities;</i> <i>(3) Provide for rural industry, infrastructure, rural commercial, conservation activities, community facilities and extractive activities;</i> <i>(4) Maintain rural character and amenity;</i> <i>(5) Limit development to activities that have a functional need to locate in the zone.</i>	The Project will result in the comprehensive industrial development of land currently zoned General Rural. It will therefore displace farming activities, permanently convert high class soils to urban use, alter the existing rural character of the Site and introduce activities that do not have a functional need to locate within the General Rural Zone. The Project is therefore not directly consistent with the principal purpose of the General Rural Zone. The Development does, however, represent a comprehensively planned industrial proposal adjoining the established Te Rapa industrial area and is supported by an integrated transport, three-waters and infrastructure framework. The wider strategic assessment also identifies substantial industrial land demand and significant economic and employment benefits. Accordingly, the tension with Objective GRUZ-O1 is acknowledged and must be weighed alongside the broader strategic direction and benefits of the Project.
GRUZ-O2 – Productive capacity of soils <i>The primary productive value of soils, in particular high class soils, is retained.</i>	The Project will permanently convert land containing high class soils from rural production to industrial use. The productive capacity of those soils will therefore not be retained. The Project is not consistent with Objective GRUZ-O2 in that respect. The effects on highly productive land are assessed in greater detail under the NPS-HPL, WRPS and Strategic Direction provisions. Those assessments recognise the productive characteristics and limitations of the Site alongside the identified need for additional industrial land, the Site's relationship with Te Rapa and the wider strategic and economic benefits of the Project. The inconsistency with Objective GRUZ-O2 is therefore acknowledged as a matter to be weighed in the overall assessment.
GRUZ-O3 – Rural character and amenity <i>(1) Maintain rural character and amenity</i>	The Project will fundamentally change the character of the Site from a predominantly rural environment to an urban industrial environment. It is therefore not consistent with the part of Objective GRUZ-O3 seeking to maintain rural character and amenity.



(2) <i>The attributes of areas and features valued for their contribution to landscape values and visual amenity are maintained or enhanced.</i>	The LVIA concludes that the effects of that change can be managed through the proposed development outcome, including landscape planting, riparian enhancement, stream restoration, open-space corridors and treatment of interfaces with adjoining rural properties. The Site is also influenced by the adjoining Te Rapa industrial area and strategic transport infrastructure, meaning the existing environment is not representative of an isolated rural landscape. While the resulting industrial character is not consistent with the rural character outcome sought by GRUZ-O3, the proposed landscape and ecological framework will assist in managing visual and amenity effects on the surrounding environment.
General Rural Zone – Policies	
GRUZ-P1 – High class soils <i>Ensure the adverse effects of activities do not compromise the physical, chemical and biological properties of high class soils.</i>	The Project will result in the permanent conversion of high class soils to industrial use and will therefore compromise their ongoing physical, chemical and biological function for primary production. The Project is not consistent with Policy GRUZ-P1. The significance of that policy tension is considered alongside the more detailed assessment of highly productive land under the NPS-HPL and WRPS, including the productive limitations of parts of the Site and the strategic and economic considerations supporting the proposed industrial development.
GRUZ-P2 – Effects of subdivision and development on soils <i>Subdivision, use and development minimise the fragmentation of productive rural land, particularly where high class soils are located.</i>	The Project will result in the subdivision and comprehensive urban development of productive rural land, including land containing high class soils. The proposal does not represent incremental or ad hoc fragmentation of rural land; rather, it provides for the coordinated development of a large contiguous area as a single masterplanned industrial development. However, the ultimate effect is still the permanent loss of that land from rural production. The Project therefore does not fully achieve the direction in GRUZ-P2 to minimise fragmentation and retain productive rural land. That tension is acknowledged and is considered alongside the wider strategic, infrastructure and economic considerations relevant to the Project.
GRUZ-P3 – Contributing elements to rural character and amenity values <i>Recognise that rural character and amenity values vary across the zone as a result of the natural and physical resources present and the scale and extent of land use activities.</i>	The Site's existing rural character is influenced by its location adjoining the Te Rapa industrial area, SH1C, SH39 and other urban and infrastructure influences. Its character therefore differs from more remote or predominantly productive rural environments. The Project will substantially change the character of the Site, but the development outcome responds to the attributes of the surrounding environment through landscape planting, riparian restoration, open-space corridors and treatment of interfaces with adjoining rural properties. The Project therefore recognises the varying character and amenity values present within the General Rural Zone and is considered generally consistent with Policy GRUZ-P3.
GRUZ-P6 – Industrial and commercial activities	The Project provides for industrial activities that are not dependent on the rural soil resource and do not have a functional or operational need to locate within the General Rural Zone.



(1) <i>Provide for rural industry and rural commercial activities provided they are either dependent on the rural soil resource or have a function or operation need for a rural location.</i> (2) <i>Such activities are to be managed to ensure that:</i> (a) <i>Their scale, intensity, and built form maintain rural character;</i> (b) <i>They maintain an appropriate level of amenity for neighbouring sites; and</i> (c) <i>They minimise reverse sensitivity effects on existing productive rural, intensive farming, quarrying, or rural industrial activities.</i> (3) <i>Avoid locating industrial and commercial activities in rural areas that do not have a genuine functional connection with the rural land or soil resource</i>	The scale and intensity of the proposed development will also fundamentally alter the rural character of the Site. The Project is therefore not consistent with the principal direction in GRUZ-P6, which seeks to avoid industrial and commercial activities in rural areas where they do not have a genuine functional connection with the rural land or soil resource. Effects on adjoining rural properties and existing activities are nevertheless proposed to be managed through landscape treatment, setbacks, infrastructure design and controls on sensitive activities. The inconsistency with GRUZ-P6 is acknowledged and must be considered alongside the broader strategic case for industrial development in this location.
GRUZ-P13 – Reverse sensitivity (1) <i>New or extended sensitive land uses avoid or minimise potential reverse sensitivity effects on lawfully established activities including (but not limited to) productive rural activities, intensive farming, rural industry, infrastructure, industrial activities, extractive activities, by achieving adequate separation distance from site boundaries and/or adoption of appropriate measures.</i>	The Project is predominantly industrial and is designed to minimise the potential for new development to constrain existing lawfully established rural, industrial and infrastructure activities. Sensitive activities within the development are limited and subject to controls intended to manage reverse-sensitivity effects. The development outcome also provides for appropriate setbacks, boundary treatment and landscape measures at interfaces with adjoining rural properties. The Project is therefore considered generally consistent with Policy GRUZ-P13.
GRUZ-P16 – Building scale and location (2) <i>Manage the size and location of buildings and structures to:</i> (a) <i>Maintain adequate levels of outlook, daylight, and privacy for adjoining existing sensitive land uses and public reserves; and</i> (b) <i>Maintain rural character, amenity, and landscape values, in particular where located in areas with high landscape values, the coastal environment and adjacent to waterbodies.</i>	The Project will enable industrial buildings of a scale and form that differ substantially from the built form typically anticipated within the General Rural Zone. The development outcome nevertheless incorporates setbacks, landscape treatment and interface controls intended to manage effects on adjoining sensitive land uses and public areas. The LVIA has also assessed the effects of the anticipated industrial built form on landscape and visual amenity and identifies mitigation through structural planting, riparian enhancement and landscape treatment of key interfaces. The Site is not located within an identified outstanding natural landscape or coastal environment, although buildings adjacent to watercourses and rural interfaces will require appropriate design and landscape treatment. While the Project does not maintain rural character in the manner anticipated by GRUZ-P16, the proposed development outcome provides measures to manage outlook, amenity and landscape effects on adjoining properties.



	The Project is therefore not fully consistent with Policy GRUZ-P16, although its adverse effects can be appropriately managed.
Earthworks – Objectives	
<i>EW-O1 – Earthworks in all zones except the MRZ1-Medium density residential zone 1 and MRZ2-Medium density residential zone 2.</i> <i>Earthworks facilitate subdivision, use and development</i>	The Project involves substantial earthworks associated with the creation of development platforms, roads, three-waters infrastructure, stormwater devices, stream works and associated servicing. Those earthworks are necessary to enable the proposed subdivision and industrial development of the Site and have been informed by the GIR, Civil Infrastructure Report, SWMP and supporting environmental assessments. Potential adverse effects associated with earthworks, including erosion and sediment discharges, dust, land instability, effects on groundwater and surface water, effects on freshwater habitats and effects on adjoining properties, will be managed through the proposed erosion and sediment control framework, construction management plans, stream works controls and geotechnical design requirements. The earthworks strategy also responds to the Site's ground conditions, including shallow groundwater, compressible soils, sensitive silts, settlement and liquefaction-related risks. Remaining site-specific geotechnical and earthworks design requirements will be addressed through detailed design and do not represent unresolved feasibility constraints. Accordingly, the Project is considered consistent with Objective EW-O1.
Transport – Objectives	
<i>AINF-O8 – Land Transport network</i> <i>(1) An integrated land transport network where:</i> <i>(a) All transport modes are accessible, safe and efficient; and</i> <i>(b) Adverse effects from the construction, maintenance, upgrading and operation of the transport network are avoided, remedied or mitigated;</i> <i>(c) Strategic road and rail corridors play an important role in the district for facilitating the movement of inter and intra-regional freight; and</i> <i>(d) There is an effective land transport system that enhances economic well-being and supports growth and productivity within the Waikato region and upper North Island.</i>	The Project provides for an integrated transport network designed to support the safe and efficient movement of people and freight associated with the proposed industrial development. Primary access will be provided from SH39 / Te Kowhai Road, with a secondary connection to Onion Road. The internal road network has been designed to accommodate industrial and heavy vehicle movements while also providing for walking, cycling and future public transport. The ITA assesses the effects of the Project on the surrounding transport network and identifies the infrastructure upgrades and development triggers required to maintain network safety and operational performance as development proceeds. The Site's location adjacent to Te Rapa and the strategic state highway network provides direct access to established freight routes and supports the movement of goods within Hamilton, the Waikato Region and the upper North Island. The Project is therefore considered generally consistent with Objective AINF-O8.



Transport – Policies

AINF-P29 – Construction, maintenance, upgrading and operation of the land transport network.

(1) Provide for the construction, maintenance, upgrading and operation of an efficient, effective, integrated, safe, resilient, accessible and sustainable transport network through:

- (a) Corridor, carriageway and intersection design which is appropriate to the road function as specified in the road hierarchy and in accordance with relevant guidelines;*
- (b) The appropriate design and location of sites' accesses;*
- (c) Traffic signage, road marking, lighting, rest areas and parking as appropriate;*
- (d) Safe and accessible provision for pedestrians and cyclists to maximise accessibility, including off-road facilities and connections;*
- (e) Corridor and carriageway design which enables provision for public transport;*
- (f) Provision for other infrastructure, including where suitable low impact design stormwater facilities;*
- (g) Provision for stock underpasses where suitable access is not readily available;*
- (h) Discouraging the installation of new at grade road and pedestrian rail level crossings:
 - (i) Controlling the location of buildings and other visual obstructions within the sightline areas of rail level crossings; and*
 - (ii) Railway crossing design in accordance with the requirements of the rail operation**
- (i) Protection and promotion of the development of the regional rail network for the transportation of freight; and*
- (j) Development of efficient processes and freight routes for the movement of high productivity motor vehicles through the region*

The proposed transport network has been designed to reflect the anticipated function of the internal industrial roads and their connections to the surrounding road network.

The development outcome provides appropriately designed road corridors, intersections and site access arrangements for industrial and heavy vehicle traffic, together with segregated walking and cycling facilities and provision for future public transport.

Stormwater and utility infrastructure will be integrated with the road corridors where appropriate, while road geometry, intersections, lighting, signage and landscaping will be developed through detailed design to maintain network safety and operational efficiency.

The ITA also identifies the external transport upgrades and staging triggers required as development proceeds, including works associated with the SH39 / Te Kowhai Road access and Onion Road connection.

Accordingly, the Project is considered generally consistent with Policy AINF-P29.



AINF-P30 – Road hierarchy and function (1) <i>Establish a road hierarchy and categorise roads in the district in accordance with their function.</i> (2) <i>Adopt the one network approach to ensure ‘whole of journey’ people and goods movements within the region</i> (3) <i>Protect the function of roads as identified in the road hierarchy from the adverse effects of subdivision, use and development.</i>	The Project has been designed having regard to the function of the surrounding road hierarchy and the role of the strategic transport network in accommodating regional and inter-regional movements. The internal road hierarchy distinguishes between primary industrial collector routes and local access functions, while external access arrangements have been assessed to ensure that development does not compromise the intended function of SH39, Onion Road or the wider strategic network. The ITA identifies staged network improvements and development triggers to manage increases in traffic demand and maintain the safe and efficient operation of the surrounding road network. The Project is therefore considered generally consistent with Policy AINF-P30.
AINF-P32 – Land transport safety <i>Ensure that structures, vehicle access, lighting, signage and vegetation are located and designed so as to not compromise the safe and efficient operation of the land transport network, or obscure RAPID numbers.</i>	The Project has been informed by the ITA and provides for appropriately designed intersections, accesses, road corridors and active-mode facilities. Detailed design of access points, sight distances, lighting, signage, landscaping and other roadside features will be undertaken so that they do not compromise the safe and efficient operation of the transport network. The Project is therefore considered consistent with Policy AINF-P32.
AINF-P34 – Vehicle access <i>Control the location of new vehicle accesses relative to other accesses, intersections and rail level crossings to maintain and improve the safety and efficiency of the land transport network.</i>	The Project provides a defined access hierarchy, with primary access via the proposed SH39 / Te Kowhai Road intersection and secondary access from Onion Road. The location and design of these connections have been assessed through the ITA having regard to intersection spacing, traffic volumes, heavy vehicle movements, network function and safety. Within the Development, access will be managed through the internal road hierarchy so that individual industrial sites can be served without creating an inefficient proliferation of direct accesses onto the higher-order roads. The proposed access arrangements, together with the identified staging triggers and network upgrades, are intended to maintain the safe and efficient operation of the surrounding transport network. The Project is therefore considered generally consistent with Policy AINF-P34.
AINF-P35 – Land transport network infrastructure (1) <i>Ensure that land transport network infrastructure is developed so that:</i> (a) <i>The design, location, alignment and dimensions of new land transport networks provide safe vehicle, pedestrian and cycling access and manoeuvring to every site;</i> (b) <i>The land transport network provides good connectivity to the site and integrates with adjacent developments and identified as future growth areas</i>	The Project provides an integrated internal transport network designed to accommodate the needs of industrial activities, including heavy vehicles, general traffic, pedestrians and cyclists. The road layout provides access to the proposed development sites and connects with the surrounding transport network through the SH39 / Te Kowhai Road and Onion Road connections. Walking and cycling infrastructure is incorporated throughout the Development and connects to the wider active-mode network, while provision is also made for future public transport. The road corridors have been designed to accommodate network utilities and stormwater infrastructure, with detailed design to provide appropriate vehicle access, manoeuvring and servicing for future industrial sites.



<i>including walking and cycling networks and facilities and public transport;</i> <i>(c) There is adequate provision of on-site parking and manoeuvring for land use activities;</i> <i>(d) Contaminants generated during construction are appropriately mitigated; and</i> <i>(e) Design, alignment and dimension of new roads will accommodate the installation of network infrastructure in accordance with technical and safety specifications.</i>	Construction-related effects, including sediment, dust and traffic disruption, will be managed through the relevant construction, erosion and sediment control and traffic-management plans. Accordingly, the Project is considered generally consistent with Policy AINF-P35.
Infrastructure, subdivision and development – Objectives	
AINF-O7 – Integration of infrastructure with subdivision, land use and development. <i>Infrastructure is provided for, and integrated with, subdivision, use and development.</i>	The Project has been comprehensively planned so that infrastructure provision is integrated with the proposed subdivision and land-use framework from the outset. The development outcome integrates transport, water supply, wastewater, stormwater, utilities, flood management and ecological infrastructure with the proposed industrial development. Infrastructure delivery is staged and linked to development capacity and identified upgrade triggers. The supporting technical assessments establish the servicing requirements for the Project and identify interim and ultimate infrastructure solutions required as development proceeds. Accordingly, the Project is considered consistent with Objective AINF-O7.
Infrastructure, subdivision and development – Policies	
AINF-P25 – Provide adequate infrastructure <i>Ensure adequate provision of infrastructure, including land transport networks, where land is subdivided creating one or more additional lots, excluding reserve or non-housing conservation lots, access and utility allotments, or its use is significantly changed or intensified, needing additional or upgraded infrastructure.</i>	The Project will create a substantial number of new industrial lots and significantly intensify the use of the Site. It therefore requires substantial new and upgraded infrastructure. The Project provides an integrated servicing framework addressing transport, water supply, wastewater, stormwater, electricity, telecommunications and other utilities. The scale and timing of infrastructure provision is linked to development staging and network capacity through identified infrastructure triggers and proposed conditions. The supporting technical assessments establish that the Project can be adequately serviced and identify the infrastructure required to support each stage of development. Accordingly, the Project is considered consistent with Policy AINF-P25.
AINF-P26 – Infrastructure location and services <i>(1) Ensure subdivision, use and development are provided with infrastructure and services to a level that is appropriate to its location and intended use including:</i> <i>(a) Three waters</i> <i>(b) Telecommunication services;</i> <i>(c) Electricity services; and</i>	The Project has been designed to provide infrastructure and services appropriate to the scale and intended industrial use of the Development. The servicing framework addresses water supply, wastewater, stormwater, electricity and telecommunications. Interim and ultimate servicing solutions have been identified where required, with infrastructure delivery coordinated with development staging and network capacity. Provision is also made for adequate firefighting water supply in accordance with the relevant engineering and servicing requirements.



(d) Adequate water supply within urban areas for firefighting purposes.	Accordingly, the Project is considered consistent with Policy AINF-P26.
AINF-P27 – Land transport network (1) Avoid, remedy or mitigate effects of subdivision, use and development that would compromise: (a) The road function, as specified in the road hierarchy; (b) The access by emergency services and their vehicles; or (c) The safety and efficiency, including the maintenance, upgrading, development and operation of the land transport network.	The Project has been designed to avoid, remedy or mitigate effects on the function, safety and efficiency of the surrounding land transport network. The ITA has informed the location and design of external access points, internal roads, intersections and staged transport upgrades. Transport infrastructure and staging triggers are proposed to ensure that development proceeds in a manner that maintains the safe and efficient operation of the surrounding network. The Project is therefore considered generally consistent with Policy AINF-P27.
AINF-P28 – Stormwater, drainage and flood management (1) Ensure that stormwater and drainage infrastructure for subdivision, land use and development manages adverse effects on the environment, community health, safety and amenity by: (a) Adopting, where appropriate, a best-practice lot impact design approach to the management of stormwater; (b) Managing stormwater in accordance with a drainage hierarchy, with a preference for at-source management; (c) Minimising impervious surfaces to reduce stormwater run-off; (d) Minimising changes to pre-development hydrological conditions by utilising the best practicable option; (e) Avoiding, remedying, or mitigating the adverse effects of: (i) Altering the frequency, volume, or duration of flow of stormwater runoff onto adjacent land or downstream sites; (ii) Altering flood plains, or overland flow paths; or (iii) Reducing flood and stormwater storage capacity on-site; (f) Mitigating upstream and downstream effects (including erosion and scour);	The Project incorporates an integrated stormwater, drainage and flood-management framework informed by the SWMP and hydraulic modelling. Stormwater will be managed using a treatment-train approach incorporating source controls, raingardens, vegetated conveyance systems and constructed stormwater wetlands. The framework prioritises at-source management and treatment of contaminants before discharge to the receiving environment. The stormwater system has also been designed to manage changes in runoff associated with urbanisation through attenuation storage, dedicated conveyance corridors, overland flow paths and reconstruction of the Mangaheka Stream corridor. Hydraulic modelling has assessed changes in peak flows, flood levels, velocities and downstream effects across a range of storm events. The development outcome seeks to minimise changes to pre-development hydrological conditions as far as practicable and incorporates measures to avoid or mitigate adverse effects on adjoining and downstream land, including flooding, erosion and scour. The SWMP has been informed by the relevant catchment management framework for the Mangaheka, Te Rapa and Te Otamanui catchments. The design also incorporates climate-change-adjusted rainfall and provides a coordinated framework for long-term stormwater management as development proceeds. The Project does not rely on new regional flood-management infrastructure. Rather, stormwater and flood effects associated with the Development are proposed to be managed within the Project's own infrastructure framework and through its integration with the wider receiving environment. Accordingly, the Project is considered generally consistent with Policy AINF-P28.



- (g) Providing a stormwater management plan for future urban development which is consistent with any catchment management plan;*
- (h) Promoting clean water reuse and groundwater recharge where practicable; and*
- (i) Avoiding, remedying or mitigating the generation of contaminants from urban development.*
- (2) Protect the continuing operation of existing regional flood management infrastructure from the adverse effects of other activities. In particular consideration shall be given to:*
 - (a) Maintain and enhancing the operational efficiency, effectiveness, viability and safety of regional flood management infrastructure;*
 - (b) Protecting investment in existing regional flood management infrastructure; and*
 - (c) Retaining the ability to maintain and upgrade regional flood management infrastructure.*
- (3) Ensure that new regional flood management infrastructure is considered having regard to:*
 - (a) The environment as it exists;*
 - (b) The duration, timing and frequency of the adverse effect;*
 - (c) The impact on other existing regional flood management infrastructure if the new work is not undertaken;*
 - (d) The need for the work in the context of the wider network or in the context of the provision of alternative infrastructure;*
 - (e) The avoidance, remediation or mitigation of anticipated adverse environmental effects to the extent practicable;*
 - (f) The demand for and benefits of new regional flood management infrastructure;*
 - (g) The route, site, and method selection process;*
 - (h) The technical and locational constraints; and*
 - (i) The benefits of the regional flood management infrastructure in terms of managing climate change effects.*



(4) <i>Provision of new regional flood management infrastructure occurs in a planned and coordinated manner which recognises and addresses potential cumulative effects and is based on sufficient information to allow assessment of the potential long-term effects on the environment.</i>	
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District Plan Objective/Policy Assessment	
Obj/Pol Provision	Comments
Subdivision – Objectives	
SUB-O1 – Subdivision <i>Subdivision layout and design promote the land use outcomes sought for the residential, business, industrial, open space and special purpose zones.</i>	The proposed subdivision forms part of a comprehensively planned industrial development and has been designed to support the long-term industrial use of the Site. The subdivision layout integrates the proposed road network, three-waters infrastructure, stormwater management, the Mangaheka Stream corridor, ecological restoration areas and open space within a coordinated manner. The proposed lots are intended to provide a range of industrial development opportunities while enabling the efficient delivery of infrastructure and environmental management measures across the Site. While the industrial land-use outcome is not presently enabled by the General Rural zoning, the subdivision itself provides a coherent framework for the proposed use and development of the Site. Accordingly, the Project is considered generally consistent with Objective SUB-O1.
Subdivision – Policies	
SUB-P1 – Subdivision location and design (1) <i>Ensure subdivision, is located and designed to:</i> (a) <i>Be sympathetic to the natural and physical qualities and characteristics of the surrounding environment;</i> (b) <i>Establish boundaries that minimises, to the extent practicable, buildings and structures dominating adjoining land or public places, the coast, or fresh waterbodies.</i> (c) <i>Average allotments to promote view sharing</i> (d) <i>Promote safe communities through quality urban design</i> (e) <i>Accommodate safe and stable building platforms and vehicle accesses; and</i>	The proposed subdivision has been designed having regard to the Site's physical and environmental characteristics, including the Mangaheka Stream corridor, existing drainage network, topography, ground conditions and interfaces with adjoining land. The layout integrates the transport network, three-waters infrastructure, stormwater management, ecological restoration areas and open-space corridors and provides for safe and stable development platforms and vehicle access. Lot boundaries and development areas have been coordinated with the proposed landscape and riparian framework to assist in managing the relationship between future industrial buildings, adjoining rural properties, public areas and freshwater environments. The road and subdivision layout establishes a logical and connected structure suitable for the scale and function of the proposed industrial development.



(f) <i>Promote consistent grid layout.</i>	Accordingly, the Project is considered generally consistent with Policy SUB-P1.
<i>SUB-P3 – Lot sizes</i> (1) <i>Minimum lot size and dimension of lots enable the achievement of the character and density outcomes of each zone; and</i> (2) <i>Prevent undersized lots in the SETZ – Settlement zone and LLRZ – Large lot residential zone.</i>	The proposed subdivision provides lots of a size, dimension and configuration suitable for the intended industrial activities, infrastructure requirements, access and manoeuvring and future development needs. The Development Framework establishes a minimum net site area of 1,000 m², subject to provision for subdivision of individual tenancies, while also enabling a range of larger industrial sites and flexibility in the final subdivision pattern. However, because the Site remains zoned General Rural, the proposed industrial lot pattern does not achieve the rural character and density outcomes presently anticipated by the operative zoning. The Project is therefore not fully consistent with Policy SUB-P3, although the proposed lot sizes are appropriate for the industrial land-use outcome sought through this application.
<i>SUB-P5 – Co-ordination between servicing and development and subdivision</i> (1) <i>Ensure development and subdivision:</i> (a) <i>Is located in areas where infrastructure capacity has been planned and able to be funded</i> (b) <i>Where located in areas subject to an approved structure plan, provides sufficient infrastructure capacity to meet the demand identified in the structure plan</i> (c) <i>Within urban areas (including Future Urban Zone), achieves the lot yield anticipated in an approved structure plan; and</i> (d) <i>Includes infrastructure provision for both the strategic infrastructure network and local infrastructure connections.</i>	The Project has been developed through a coordinated land-use, subdivision and infrastructure planning process. The development outcome identifies the transport, water supply, wastewater, stormwater and utility infrastructure required to support the proposed industrial development and links infrastructure delivery to development staging and capacity. The supporting technical assessments identify both interim and ultimate servicing solutions and the infrastructure upgrades and triggers required as development proceeds. The Site is not presently subject to an approved structure plan that provides for the proposed industrial development. Accordingly, those aspects of Policy SUB-P5 relating specifically to approved structure plans are not directly applicable. The Project nevertheless responds positively to the underlying direction of the policy by integrating strategic and local infrastructure provision with subdivision and development and ensuring that development does not proceed ahead of the infrastructure necessary to service it. The Project is therefore considered generally consistent with Policy SUB-P5.
<i>SUB-P6 – Achieving sufficient development density to support the provision of infrastructure services in areas without a structure plan</i> <i>In areas where there is no structure plan, ensure that the land is developed efficiently to support the provision of infrastructure services.</i>	The Site is not subject to an approved structure plan providing for the proposed industrial development. The Project has therefore been comprehensively masterplanned to ensure that land is developed efficiently and that the scale and configuration of subdivision supports efficient infrastructure provision. The proposed lot pattern provides a range of industrial development parcels within a connected road and servicing network, with transport, three-waters, stormwater and utility infrastructure planned across the Site as an integrated system.



	The development outcome therefore avoids fragmented or inefficient subdivision and provides sufficient development intensity to support the proposed infrastructure investment. Accordingly, the Project is considered consistent with Policy SUB-P6.
SUB-P7 – Staging of subdivision <i>Require any staging of subdivision to be undertaken in a manner that promotes efficient development and integration of infrastructure and community facilities.</i>	The Project will be developed in stages, with subdivision and development coordinated with the delivery of transport, water supply, wastewater, stormwater and other supporting infrastructure. The proposed staging framework links development to identified infrastructure capacity and upgrade triggers so that each stage can be appropriately serviced without compromising the operation of existing networks or the ability to deliver later stages. Environmental infrastructure, including stormwater facilities, stream works and ecological restoration, will also be delivered in a manner coordinated with subdivision and development. The Project is therefore considered consistent with Policy SUB-P7.
SUB-P10 – Reverse sensitivity (1) <i>Other than in the GIZ – General Industrial Zone and HIZ – Heavy Industrial Zone, development and subdivision design minimises the potential for reverse sensitivity effects on adjacent sites, adjacent activities, or the wider environment; and</i> (2) <i>Avoid, to the extent possible, and otherwise minimise, potential reverse sensitivity effects of locating new sensitive land uses in the vicinity of an intensive farming, extraction industry or industrial activity and regionally significant infrastructure.</i>	The proposed subdivision has been designed to minimise the potential for future development to create reverse-sensitivity effects on existing rural, industrial and infrastructure activities. The Development Framework is predominantly industrial and limits sensitive activities. Where sensitive or non-industrial activities are provided for, they are subject to location and performance controls intended to avoid or minimise reverse-sensitivity effects. The subdivision layout also provides for appropriate separation, landscape treatment and environmental corridors at interfaces with adjoining rural land and recognises the operational requirements of the surrounding strategic transport and infrastructure networks. Accordingly, the Project is considered generally consistent with Policy SUB-P10.
SUB-P15 – Effects of subdivision and development on soils in the GRUZ – General rural zone. <i>Subdivision, use and development minimises the fragmentation of productive rural land, particularly where high class soils are located.</i>	The Project will result in the subdivision and permanent conversion of productive rural land, including land containing high class soils, to industrial use. The proposed subdivision does not represent incremental or ad hoc fragmentation of productive land. Rather, it provides for comprehensive development of a large contiguous area. However, the ultimate effect is still the permanent loss of that land from productive rural use. The Project therefore does not fully achieve the direction in Policy SUB-P15 to minimise fragmentation of productive rural land, particularly where high class soils are present. That tension is acknowledged and is considered alongside the more detailed assessment of highly productive land under the NPS-HPL and WRPS and the wider strategic, infrastructure and economic considerations relevant to the Project.
SUB-P16 – Rural subdivision in the GRUZ – General rural zone (1) <i>Protect the productive capacity of land and soils.</i> (2) <i>Maintain an open and spacious rural character</i>	The Project proposes an urban industrial subdivision pattern within land currently zoned General Rural.



- (3) *Minimise adverse effects on the safe and efficient operation of infrastructure; by:*
- (a) *Avoiding subdivision that creates lots smaller than 0.8ha;*
 - (b) *Avoiding the creation of new lots that are wholly located on high class soils. For the sites that are partially located on high class soils, new lots are to be located primarily on that part of the site that does not include high class soils;*
 - (c) *Limiting potential reverse sensitivity effects on productive rural activities, intensive farming, rural industry, infrastructure, or extractive activities by ensuring new lots provide adequate setbacks from potential sensitive activities;*
 - (d) *Ensuring that the subdivision does not compromise public access to rivers and water bodies or the quality of these environments; and*
- (4) *Make only limited provision for small rural lifestyle lots, where in addition to the matters set out in (1), (2), and (3), the subdivision:*
- (a) *Provides public parks and reserves, located in accordance with a Council Parks Strategy; or*
 - (b) *Provides a balance lot greater than 40ha; or*
 - (c) *Involves a boundary relocation to create the same number of lots formed as a large balance lot greater than 40ha and a number of small rural lifestyle lots that are clustered to form a hamlet; and*
 - (d) *Where (4)(b) and (c) applies, avoids ribbon development and the cumulative effects of multiple small rural residential lots located on the same road frontage.*

It will permanently convert productive rural land, including high class soils, and will fundamentally change the open and spacious rural character of the Site. It therefore does not achieve the principal rural subdivision outcomes sought by Policy SUB-P16.

The proposal does, however, avoid the creation of rural lifestyle lots and associated reverse-sensitivity effects and has been designed so that the subdivision integrates with transport and infrastructure networks and does not compromise access to or the quality of freshwater environments.

The Project is therefore not consistent with the principal direction of Policy SUB-P16. That inconsistency reflects the fundamental change in land use sought through the application and is considered alongside the wider strategic case for industrial development in this location.



Strategic and Spatial Document

Future Proof Strategy

Future Proof Strategy Objective/Policy assessment	
Obj/Pol Provision	Comments
Key Actions – Transformational Move	
Transformational Move 1: Iwi aspiration <i>Enhancing the environmental health and wellbeing of the Waikato River in accordance with Te Ture Whaimana o Te Awa o Waikato – Vision and Strategy for the Waikato River, while supporting iwi and mana whenua in embracing social and economic opportunities within the sub-region. For Waikato Tainui this is a specific emphasis on Hopuhopu and Ruakura, and Meremere in the longer term after Ruakura, for other mana whenua groups within the sub-region will include land use aspirations to build papakaainga housing or horticulture/agri-culture farming transformations to name a few. Other iwi and mana whenua groups have high populations of their people living within the subregion and may also wish to pursue social, economic, and other opportunities within the sub-region.</i>	The Project recognises and provides for iwi and tangata whenua aspirations through ongoing engagement, the preparation of a CIA, and the incorporation of cultural values into the development outcome. The proposal includes restoration and enhancement of the Mangaheka Stream corridor, wetland creation, riparian planting and ecological restoration measures that seek to improve freshwater health, ecological function and the mauri of the receiving environment. The Project also facilitates social and economic opportunities through the development of a substantial new industrial area that will provide employment, business and infrastructure benefits to the wider region. Through the integration of cultural, environmental and economic outcomes, the Project aligns with the intent of Transformational Move 1 by supporting both environmental enhancement and opportunities for future prosperity.
Transformational Move 2: Waikato River <i>Give effect to Te Ture Whaimana o Te Awa o Waikato - the Vision and Strategy – including by celebrating the Waikato River as the defining ecological feature connecting the metro area to the heart of a blue-green network supporting environmental and recreational use and creating a sense of place. While our current focus is on the Waikato River catchment and Te Ture Whaimana, our approach also highlights the importance of other river catchments in the sub- region such as the Piako, Waitoa and Waihou.</i>	The Project aligns with the intent of Transformational Move 2 by recognising the importance of freshwater environments and incorporating significant investment in stream restoration, stormwater management, wetland creation and ecological enhancement within the Mangaheka Stream catchment. While the Site is not directly adjacent to the Waikato River, the Project contributes to broader catchment health through improvements to water quality, stream habitat, riparian margins and ecological function. The proposed stormwater management framework adopts an integrated treatment train approach and is supported by restoration of the Mangaheka Stream corridor, which contributes to the wider blue-green network within the sub-region. These measures are intended to improve freshwater outcomes, enhance biodiversity and support long-term environmental resilience. Accordingly, the Project is considered generally consistent with the broader intent of Transformational Move 2.



Transformational Move 5: Strong and productive economic corridors <i>Establishing economic corridors that connect our centres of production to our metro areas of employment and our ports and airports with a particular emphasis on access to the highly productive employment areas between Hautapu, Ruakura, Hamilton central city and north to Horotiu and Ngaaruawaahia.</i>	The Project directly supports the development of a strong and productive economic corridor through the provision of a substantial new industrial precinct on the north-western edge of Hamilton, adjoining the established Te Rapa industrial area and within the wider Hamilton–Te Rapa–Horotiu employment corridor. The Site is strategically located close to the Waikato Expressway and other strategic transport connections, providing efficient access to regional freight networks, employment areas, ports and airports. The Project will increase the supply of industrial land within one of the Waikato region’s key economic corridors, supporting business investment, freight movement, employment generation and long-term economic productivity. The Project also includes significant investment in transport, three-waters, stormwater and flood-management infrastructure, ensuring that future industrial development is supported by appropriate servicing and network capacity. Through its strategic location, integration with regional transport infrastructure and provision of employment-generating industrial land, the Project supports the broader intent of Transformational Move 5 and the continued development of the Hamilton–Te Rapa–Horotiu economic corridor.
Transformational Move 7: Water wise and water sensitive communities <i>Grow and foster waterwise communities through a fundamental shift and approach that places sustainability, resilience, and environmental protection at the heart of our urban water planning and ensuring that urban water management is sensitive to natural hydrological and ecological processes.</i>	The Project aligns with Transformational Move 7 through the adoption of an integrated stormwater, drainage and flood management framework that places environmental protection, resilience and long-term sustainability at the centre of the development. The proposed Stormwater Management Plan adopts a treatment train approach incorporating wetlands, raingardens, vegetated treatment systems, attenuation infrastructure and restoration of the Mangaheka Stream corridor. The Project has been designed to manage stormwater in a manner that responds to natural hydrological processes, maintains catchment function and protects downstream receiving environments. Stream restoration, riparian enhancement, wetland creation and ecological restoration measures are integrated with the stormwater management system to improve water quality, habitat values and overall catchment resilience. The proposed flood management and stormwater infrastructure also responds to future rainfall variability and climate change effects through attenuation, flood conveyance improvements and a coordinated catchment-wide approach to water management. The Project is therefore considered consistent with the broader direction of Transformational Move 7.

TKE is not specifically identified as a planned growth area, but it is well aligned with the broader transformational direction for the Hamilton–Te Rapa–Horotiu economic corridor, freshwater restoration, iwi aspirations and water-sensitive urban development.



Waikato Regional Land Transport Strategy Plan

Waikato Regional Land Transport Strategy Objective/Policy assessment	
Obj/Pol Provision	Comments
Resilience – Objective	
<i>An efficient and resilient land transport system that ensures communities have route security and access to essential services</i>	The Project supports the delivery of an efficient and resilient land transport system through the provision of new transport infrastructure integrated with the wider Te Rapa and Waikato Expressway network. The transport framework has been designed to accommodate future industrial development while maintaining network efficiency, supporting freight movement and providing reliable access to employment and services. The proposal includes new and upgraded transport infrastructure and supporting services that will improve connectivity and provide appropriate capacity for the proposed development. The coordinated delivery of transport, stormwater, flood-management and three-waters infrastructure also supports long-term resilience by ensuring that the Development is serviced through an integrated infrastructure framework. Through its strategic location, integration with regional transport corridors and provision of supporting infrastructure, the Project contributes to a resilient transport network that supports economic activity and reliable access.
Resilience - Policies	
• <i>Improve resilience and route security on key strategic corridors</i> • <i>Plan for anticipated effects of climate change impacts</i> • <i>Build community resilience</i>	The Project supports the resilience of the regional transport network through transport infrastructure integrated with the Te Rapa industrial area, Waikato Expressway and other strategic freight routes. The proposed network has been designed to accommodate future industrial growth while maintaining network performance and supporting reliable freight and employment access. Climate-change effects have also been incorporated into the wider stormwater and flood-management framework for the Development, reducing the potential for future flooding to compromise the function of the internal transport network.
Growth and economic development – Objectives	
• <i>An integrated transport system that supports compact urban form and planned future growth</i> • <i>An efficient and resilient strategic corridor network that advances regional economic and social wellbeing</i>	The Project will provide a substantial addition to industrial development capacity on the north-western edge of Hamilton, adjoining the established Te Rapa industrial area and within the wider Hamilton–Te Rapa–Horotiu employment corridor. While TKE is not presently identified as a planned industrial growth area in all relevant strategic documents, its location and scale mean that it will materially contribute to future employment growth and economic activity in this part of the metropolitan area. The development outcome integrates transport, three-waters, stormwater, flood management and ecological infrastructure to support coordinated development of the Site. The proposed transport network has been designed to connect efficiently with the surrounding road hierarchy and strategic freight routes, ensuring the development is supported by appropriate infrastructure.



	The Project will also contribute to the efficiency and resilience of the regional transport network through its proximity to the Waikato Expressway and wider strategic freight network. The development of a substantial new industrial precinct will strengthen the wider Hamilton–Te Rapa–Horotiu economic corridor by improving access to employment land, supporting freight movement and facilitating business investment. Accordingly, the Project is considered generally consistent with the growth and economic-development objectives of the RLTP.
Safety – Objective	
<i>A safe, accessible transport system in the Waikato region, where no-one is killed or seriously injured</i>	The Project supports this objective through a comprehensively planned transport network informed by detailed transport assessment and designed to provide safe and efficient movement for vehicles, freight, pedestrians and cyclists. The proposed access arrangements, intersection upgrades and internal road hierarchy have been developed to accommodate the anticipated demands of the Project while maintaining appropriate safety outcomes. Walking and cycling facilities are also incorporated into the transport network, including dedicated facilities along the principal internal routes and connections to the surrounding active-mode network. The Project is therefore considered consistent with the safety objective of the RLTP.



Hamilton-Waikato Metropolitan Spatial Plan

Hamilton-Waikato Metropolitan Spatial Plan Objective/Policy assessment	
Obj/Pol Provision	Comments
Objectives	
<i>Improve access to employment, education and services.</i>	The Project supports the objectives of the Hamilton-Waikato Metropolitan Spatial Plan through the provision of substantial additional industrial development capacity on the north-western edge of Hamilton, adjoining the established Te Rapa industrial area and within the wider Hamilton–Te Rapa–Horotiu employment corridor. The Project will provide significant employment opportunities, support economic development and improve access to jobs within the wider metropolitan area. The proposal adopts an integrated approach to land use, infrastructure and environmental management, including transport, stormwater, flood management and ecological restoration. This supports the Spatial Plan’s direction for coordinated growth, climate resilience and integrated planning across territorial boundaries. The Project will also contribute to the continued development of the Hamilton–Te Rapa–Horotiu economic corridor, while the restoration and enhancement of the Mangaheka Stream corridor will contribute to improved environmental outcomes. While the Site is not specifically identified in the Metropolitan Spatial Plan as a planned urban growth area, the Project is considered to be generally consistent with the broader objectives and strategic direction of the Hamilton-Waikato Metropolitan Spatial Plan.
<i>Assist emission reductions and build climate resilience.</i>	
<i>Enhancing the quality of the natural and built environments and the vitality of Auckland and Hamilton and the communities within the corridor.</i>	
<i>Improving access to employment, public services and amenities.</i>	
<i>Creating employment opportunities in the corridor.</i>	
<i>Trialling new urban planning tools to coordinate growth development.</i>	
<i>Planning in an integrated way based on communities of interest rather than existing council boundaries.</i>	



Waikato 2070 Objective/Policy assessment	
Obj/Pol Provision	Comments
Grow Our Communities	
<i>Direction: Promote sustainable and cost-effective land-use patterns</i> <i>Implementation</i> 1. <i>Take leadership and build our district to respond to climate change and help mitigate its effects.</i> 2. <i>Stage development and be adaptable to future growth scenarios.</i> 3. <i>Integrate land-use and transport to make better use of infrastructure and our transport connections, while interacting and protecting the environment.</i> 4. <i>Leverage existing transport networks, including walking and cycling infrastructure, and identify and protect sites and areas from future development.</i> 5. <i>Protect strategic sites, corridors and areas for future development.</i> 6. <i>Locate future development to capitalise on existing serviced network infrastructure and facilities of towns.</i> 7. <i>Ensure connectivity and integration of greenfield development to existing built-form (street-block design).</i> 8. <i>Encourage rural areas and villages to explore ways to remain sustainable.</i>	The Project aligns with this direction by providing a comprehensively planned industrial development that integrates land use, transport, three-waters infrastructure, stormwater management and environmental enhancement. The development outcome supports staged growth, efficient infrastructure provision and strong connectivity to the existing Te Rapa industrial area and strategic transport network. The proposal also incorporates flood management, stream restoration, ecological enhancement and climate-resilience measures. While the Site is not presently identified as a planned industrial growth area in all relevant strategic documents, its location adjoining the established Te Rapa industrial area and within the wider Hamilton–Te Rapa–Horotiu employment corridor supports a coordinated and infrastructure-integrated urban outcome.
Build Our Businesses	
<i>Direction: Supporting existing businesses to grow and attract new businesses to the district</i> <i>Implementation</i> 1. <i>Build on existing industrial clusters and promote the clustering of complementary businesses.</i> 2. <i>Identify and develop new strategically-located industrial clusters for secondary industries.</i> 3. <i>Create ease of access pathways and incentives for investors to locate in the district.</i> 4. <i>Strengthen collaboration and engagement with businesses.</i> 5. <i>Identify new areas for service industries to locate and expand while taking into account the local environment.</i>	The Project aligns with this direction through the development of a substantial new industrial precinct adjoining the established Te Rapa industrial area and within the wider Hamilton–Te Rapa–Horotiu employment corridor. The proposal will support business growth, attract new investment, improve access to strategic transport infrastructure and provide employment opportunities. The development outcome also includes coordinated provision of transport, three-waters, stormwater and environmental infrastructure to support future business activity and long-term economic growth. The Project also responds to the direction to build on existing industrial clusters and identify strategically located areas for industrial development. Rather than establishing an isolated industrial node, TKE will extend an existing employment



6. <i>Support primary industries which underpin the Waikato economy.</i> 7. <i>Recognise and promote the role that agriculture, horticulture and primary industries have within the district.</i> 8. <i>Encourage rural industrials to support sustainable rural communities and areas.</i> 9. <i>Ensure that businesses have access to social and physical infrastructure and services.</i> 10. <i>Create regional and local skills development training for our people (build people capital).</i> 11. <i>Develop business and economic relationships to support the community aspirations as identified in the Waikato District Council Blueprints.</i>	corridor and provide a significant additional source of industrial land in close proximity to established infrastructure and freight networks. Overall, the Project is considered generally consistent with this direction and its relevant implementation actions.
<i>Direction: Help deliver inclusive growth</i> <i>Implementation</i> 1. <i>Lead, support and coordinate initiatives focused on growing economic development activities for businesses within the district.</i> 2. <i>Adapt and respond promptly to changing business needs.</i> 3. <i>Link central and regional government initiatives to businesses.</i> 4. <i>Create economic and social opportunities that ensure our young people have access to employment and social activities that build a future in the district.</i> 5. <i>Grow and develop the social and economic potential of social enterprise.</i> 6. <i>Facilitate stronger communities and business partnerships using Open Waikato.</i> 7. <i>Promote the development of a diversified economy and increase employment opportunities in knowledge-based sectors.</i>	The Project aligns with this direction through the provision of substantial additional industrial development capacity that will support business investment, economic development and employment generation within the Waikato District and wider Hamilton metropolitan area. The proposal will expand opportunities for businesses to establish and grow within a well-served industrial precinct connected to key transport networks and established employment areas. Through the delivery of industrial land, supporting infrastructure and long-term employment opportunities, the Project contributes to inclusive economic growth and the ongoing prosperity of the district. The Project is therefore considered consistent with this direction.
Embrace Our Identity	
<i>Direction: Promote our culture</i> <i>Implementation</i> 1. <i>Continue to partner with local iwi to help realise their social, cultural, economic and environmental aspirations.</i> 2. <i>Build on the Open Waikato initiative to promote the district, especially the rural productive resources.</i> 3. <i>Support tourism development and work with tourism agencies and the community to promote the district's diverse culture.</i> 4. <i>Embrace the diversity of the cultures and history within the district through tourism opportunities.</i>	The Project aligns with this direction through ongoing engagement with tangata whenua, preparation of the CIA and incorporation of cultural values into the development outcome. The proposal includes restoration and enhancement of the Mangaheka Stream corridor, riparian planting, ecological restoration and ongoing mana whenua involvement through the proposed Tangata Whenua Management Plan. Through the combination of cultural engagement, environmental enhancement and employment and economic opportunities, the Project supports the social, cultural and economic wellbeing outcomes sought by this direction.



Direction: Protect our environment

Implementation

- 1. Encourage iwi and hapuu to identify with their culture and the environment.*
- 2. Encourage communities to be stewards of their environment.*
- 3. Encourage sustainable and resilient land use patterns that focus development in our key towns which are well connected and serviced by amenities.*
- 4. Promote ecological and environmental protection and restoration.*
- 5. Restrict residential development in areas at risk from natural hazards.*
- 6. Encourage and assist communities to adapt to climate change and to manage and adapt to its effects on the environment.*
- 7. Encourage land uses that utilise our highly productive land by promoting agriculture production and restrict those uses that reduce them and diminish their quality or the landscape.*
- 8. Restrict multi-lot residential subdivision in rural areas outside of identified growth areas.*
- 9. Cluster industrial activities in industrial zones and restrict them in rural areas.*
- 10. Encourage all industries to utilise environmental best practices.*

The Project supports a number of the environmental outcomes sought by this direction through restoration and enhancement of the Mangaheka Stream corridor, riparian planting, ecological restoration, integrated stormwater management, flood management and climate-resilience measures.

There is, however, clear tension with implementation actions 7 and 9. The Project will result in the permanent conversion of productive rural land to industrial use, and the Site remains zoned General Rural rather than Industrial. The Project therefore does not align with the direction to promote productive use of highly productive land or to cluster industrial activities within existing industrial zones.

That tension must be considered in the context of the Site's location immediately adjoining the established Te Rapa industrial area and within the wider Hamilton–Te Rapa–Horotiu employment corridor, the identified demand for additional industrial land, and the comprehensive and infrastructure-integrated nature of the Development.

The Project also incorporates substantial environmental restoration and enhancement measures and will function as an extension of an established industrial area rather than as an isolated industrial activity within the rural environment.

Overall, while the Project is not fully consistent with all implementation actions under this direction, it is considered generally consistent with the broader strategic direction of Waikato 2070 when considered as a whole.

