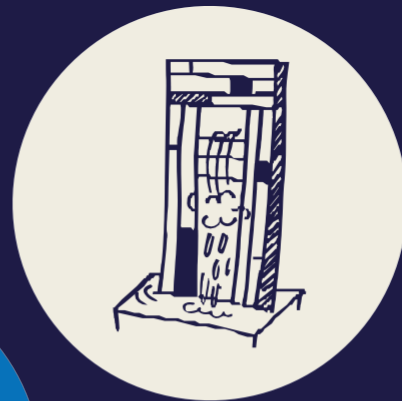


# HAMILTON CITY COUNCIL SUBMISSION

## Proposed Private Plan Change 20 - Airport Northern Precinct Extension

Waipā District Council



28 October 2022



**Hamilton  
City Council**  
Te kaunihera o Kirikiriroa

## Improving the Wellbeing of Hamiltonians

Hamilton City Council is focused on improving the wellbeing of Hamiltonians through delivering to our five priorities of shaping:

- **A city that's easy to live in**
- **A city where our people thrive**
- **A central city where our people love to be**
- **A fun city with lots to do**
- **A green city**

The topic of this submission is aligned to the priority '**A city where our people thrive**'.

## Council Approval and Reference

This submission was approved under delegated authority by Hamilton City Council's Chief Executive on 28 October 2022.

Hamilton City Council Reference D-4434780 - Submission # 708.

## Key Messages and Recommendations

1. Subject to the provisions being edited in accordance with the relief sought in this submission as set out at Appendix 1, Hamilton City Council supports the **Proposed Private Plan Change 20 - Airport Northern Precinct Extension**.
2. The Northern Precinct offers a significant opportunity to bring on-line much needed industrial land supply which will support employment opportunities for the sub-region, attract new businesses and support a southern employment node. There are few development opportunities of this scale existing around major airports in the upper-North Island. The Northern Precinct is in close proximity to Hamilton (less than 2km away) and therefore if approved, would provide local employment opportunities for the growing population in the south of the City.
3. We would like to see the planning controls proposed related to the Northern Precinct strengthened to support high-value industrial activities to occur here to leverage the unique strategic locational advantages this location offers. Coupled with this, we support controls which ensure a high amenity business park environment is created.
4. We question the extent of the Proposed Plan Change area and suggest a better long-term integrated planning outcome would be for the Proposed Plan Change to also encompass the block of land to the north-west of the site bounded by the Southern Links Designation. This would be a logical extension of the Northern Precinct, providing a defensible boundary in the form of Southern Links. It would also mean that reverse sensitivity issues can be better managed, provide certainty for nearby landowners, and that planning for the Northern Precinct at the outset can anticipate and account for this area being developed for industrial uses in future.
5. We are opposed to retail activity occurring in the Northern Precinct beyond those retail activities that are required to service the day-to-day needs generated by those working in and visiting the Northern Precinct. We are opposed to retail activities occurring here which would undermine the vitality and viability of other centers and increase out-of-centre trip generation.
6. The transport effects arising from this proposed re-zoning are likely to be great, both on the surrounding road network and within Hamilton City. We are supportive of interim staged transport solutions to enable development to occur but believe more analysis is required to demonstrate when Southern Links is, or stages of Southern Links are required based on other existing and planned growth within the wider catchment. To realise the full economic potential of the wider Airport precinct high quality transport linkages are required to allow efficient freight movements and to promote new businesses to locate here. Without new road linkages, the amenity and safety of the urban environments such as Glenview and Melville suburbs are likely to be significantly impacted due to the increased freight and commuter vehicle movements on these networks.
7. We support the requirement for the Northern Precinct to connect to a public wastewater solution in the form of the Southern Wastewater Treatment Plant. We support stronger triggers around this in the proposed plan provisions to ensure this occurs sooner to avoid inefficient short-term and/or private solutions occurring.

## Introduction

8. Hamilton City Council appreciates the opportunity to make a submission to **Proposed Private Plan Change 20 - Airport Northern Precinct Extension**.
9. We generally support the intention to:
  - Rezone approximately 89ha of land to the northwest of the Airport, from Rural to Airport Business Zone.
  - Amend the Airport Business Structure Plan contained in Appendix S10 of the Waipā District Plan.
  - Amend the Airport Business Zone (Titanium Park) provisions contained in section 10 of the Waipā District Plan.
  - Amend the infrastructure, Hazards, Development and Subdivision provisions contained in section 15 of the Waipā District Plan.
  - Amend the Assessment Criteria and information requirements contained within section 21 of the Waipā District Plan.
10. We have outlined high level context for key topics which then correlates to a more detailed explanation of the issues and relief sought in Appendix 1.

## Background

11. Hamilton City is the largest city in the sub-region with a population of 181,500 people as of 2021<sup>1</sup>. It is the fourth most populous and one of the fastest growing cities in New Zealand. Projections indicate that this growth is set to continue for the foreseeable future. There are a number of factors contributing to the growth of Hamilton, including its strategic location in respect to Auckland and Tauranga, its strong economic profile and relative ease to develop.
12. Hamilton City Council is a 50% shareholder in the Waikato Regional Airport Limited, the holding company of Titanium Park Limited, the entity, along with Rukuhia Properties Limited, with whom have lodged Proposed Private Plan Change 20 - Airport Northern Precinct Extension (Northern Precinct).
13. The Proposed Private Plan Change 20 - Airport Northern Precinct Extension is within 2km of the boundary of Hamilton City Council and Peacocke, Hamilton's southernmost greenfield growth cell which will be home to approximately 20,000 people – similar population size to Cambridge. Plan Change 5 to the Hamilton City Council Operative District Plan seeks to live zone Peacocke, concluded hearings in September 2022 and decisions are due in late 2022/early 2023.
14. An area referred to as SL1 and SL2 has been identified for further investigation by the Future Proof Implementation Committee in 2022 for possible inclusion in the upcoming Future Development Strategy. These areas, if identified for future urban development, would likely accommodate future residential and employment growth of Hamilton to the south of the City (refer to Appendix 2). If so, Hamilton City's urban area would be in future largely contiguous with the Proposed Private Plan Change 20 - Airport Northern Precinct Extension as proposed.

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1 IDEA, 2021. Population (Low, Medium and High) 2018 projection outputs.

15. SL1 and SL2 are bounded by the Southern Links Designation. Southern Links is currently unfunded, but once constructed, would provide a critical east-west link from the Waikato Expressway in the East to Kahakatea Drive in the west. Hamilton City Council see this as a critical link to support and unlock employment and residential growth in the south of the City and improve sub-regional freight and traffic movements. More analysis is required to determine when Southern Links is, or stages of Southern Links are, required.
16. Across the sub-region, Hamilton City's growth is projected to account for over 60 per cent of the total long-term household growth in the sub-region between (2020-2050)<sup>2</sup>. The Hamilton-Waikato Metropolitan Spatial Plan (MSP) (2020) anticipates that 70% of the forecast growth will occur within Hamilton over the next 100 years, and of that 50% will be infill. The recently released Draft Hamilton Urban Growth Strategy (HUGS) targets 70% infill over the long term.
17. The predominant demand for employment growth (based on GFA) is expected to be within Hamilton. The Housing Business and Capacity Assessment (HBA) (2021) for the sub-region showed over the long-term industrial demand for Hamilton City Council is estimated to be 2,569,000 GFA versus 700,000 GFA for Waikato District Council and 523,000 GFA for Waipā District Council. The Housing Business and Capacity Assessment (2021) for the sub-region showed that Hamilton City Council has 539.6 (ha) over the long term and 639.7 (ha) total vacant land. Te Rapa and Ruakura areas contribute the vast majority to these totals. However, Te Rapa is yet to go through a plan change and has a range of constraints. Ruakura, while zoned west of the Waikato Expressway, has infrastructure constraints. Ruakura East is not yet zoned or serviced and has only recently been identified in Future Proof (2022). Re-zoning the Airport Northern Precinct Extension would help meet demand and maintain a supply of industrial land to support a competitive industrial land supply market in the sub-region.
18. The gap between vacant business land supply and forecast land demand in Hamilton and Waipa is closer than that for retail and commercial. In the long term, 10-30-year horizon, demand for industrial land could be close to the total land supply in these TLAs. There are also limited quantities of land identified for industrial purposes beyond the 30-year horizon of the HBA, therefore limited opportunities for the councils to bring forward future greenfield sites to increase industrial capacity should actual demand exceed forecasts.
19. Commentary from the development and real estate sector suggests there are concerns about the quantum and nature of land available for industrial development purposes when compared to overall demand being experienced. This is supported by the evidence lodged in support of Plan Change 20. Industrial demand and take-up are not only driven from within the sub-region but also from the spill-over effects from the likes of Auckland and Tauranga due to industrial land supply shortages in those markets.

#### **Strategic Importance of the Airport**

20. Hamilton City Council recognises that the Airport and its surrounding area is a significant regional infrastructure resource and employment node. The airport is recognised in a number of key policy and strategy documents across the wider sub-region, including the Hamilton to Auckland Corridor Plan, the Hamilton-Waikato Metropolitan Spatial Plan (MSP), and the Future Proof Growth Strategy.
21. The MSP regards the Airport as the southern anchor of a strong and interconnected network of urban and rural areas that make up a metro area with Hamilton CBD at its core. The metro area plays an important role in the corridor as it is strongly linked to Auckland, Bay of Plenty and the wider Waikato region providing significant economic functions.

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<sup>2</sup> M.E. consulting for Future Proof, 2021. NPS-UD Housing Development Capacity Assessment

22. The MSP notes that the airport is home to a significant industrial precinct which has a logistics focus with further stages of land to be developed in the area. The Plan notes that access to frequent public transport in the future will strengthen the role of the Airport Business Centre.

## Higher Order Planning Documents

23. There are a number of higher order planning documents which this plan change must take account of: the Hamilton-Waikato Metropolitan Spatial Plan (MSP) (2020) and the Future Proof Strategy (2022).
24. The Proposed Private Plan Change 20 Hearings Panel is required to have regard to the MSP and the Future Proof Strategy (2022) as per the Resource Management Act (1991) section 74(2)(b)(i)<sup>3</sup>. Case law has established<sup>4</sup> the degree to which non-RMA documents involve public consultation and are expected to influence RMA processes. The extent of consultation and public engagement influences the degree to which they are relevant and the weight they should be given in RMA processes.

### Hamilton-Waikato Metropolitan Spatial Plan

25. The Hamilton-Waikato Metropolitan Spatial Plan (HWMSP) was approved by the Future Proof Implementation Committee in September 2020. The purpose of the HWMSP is to Hamilton City and the neighbouring communities within Waipā and Waikato districts will grow and develop over the next 100 + years creating one of the most liveable places in New Zealand.
26. MSP was developed on the growth scenario that would see the metropolitan area growing to 500,000 population underpinned by the fact that the metro area is one urban system where development and resources are connected and are not limited by local government boundaries. An important consideration in the context of this private plan change request.
27. There are several transformational moves which the strategy sets out relevant to Proposed Private Plan Change 20, these include:
- a. A radical transport shift - a multi-modal transport network, connecting the metro area and facilitating a radical shift to using public transport through the establishment of a rapid and frequent public transport network shaped around where and how our communities will grow.
  - b. A vibrant metro core and lively metropolitan centres - growing Hamilton central city as our civic, administrative, cultural and commercial metro core, alongside lively metropolitan centres, well connected by public transport and safe walking and cycling networks, where people can afford to live, work and play.
  - c. A strong and productive economic corridor - establishing an economic corridor that links the highly productive employment areas between Ruakura, Hamilton central city and north to Horotiu and Ngaaruwaahia.
28. Within the strategy the Airport is identified as an existing 'business centre' with expansion anticipated to occur in the future. A directive associated with this, relevant in the context of this plan change is that "existing and new centres have a high-quality public realm to attract investment and capture agglomeration benefits". We expect the plan change provisions to give rise to this directive.

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<sup>3</sup> "when preparing or changing district plans, territorial authorities shall have regard to ... management plans and strategies prepared under other Acts"

<sup>4</sup> Ruakura Board of Inquiry Decision (vol 1, September 2014); A and A King Family Trust v Hamilton City Council [2016] NZEnvC229; Sade Developments No.2 Ltd v Taupo District Council [A033/09];

## Future Proof

29. The Future Proof Partnership and Strategy is a 30-year growth management and implementation plan specific to the Hamilton, Waipā and Waikato sub-region within the context of the broader Hamilton-Auckland Corridor and Hamilton-Waikato Metropolitan areas. The strategy provides a framework to manage growth in a collaborative way for the benefit of the Future Proof sub-region both from a community and a physical perspective. This sub-regional approach is needed to manage growth in a staged and coordinated manner and to address complex planning issues, especially cross-boundary matters.
30. The Future Proof Strategy 2022 recognises the Airport specifically as a ‘Strategic Industrial Node’ [*underlined for emphasis*] and a priority development area (under Focus Area 5 for the Hamilton-Auckland Corridor Plan). Guiding principle 2.7 of the strategy is particularly relevant in this context:

*Ensure commercial and industrial development is located in key growth areas and that it is not located where it undermines the areas of influence of established centres.*

31. In relation to the proposed plan change for the Airport, consideration of the relevant guiding principles of the Future Proof Strategy are appropriate. Key guiding principles that are relevant to the plan change are:
- Ensure commercial and industrial development is located in key growth areas and that it is not located where it undermines the areas of influence of established centres.
  - Align the staging and timing of the settlement pattern with the partners’ infrastructure and investment plans.
  - Ensure that planning is integrated with infrastructure and funding decisions.
32. We have concerns that as proposed, the Plan Change may not deliver on these principles, specifically in relation to the alignment of funding and infrastructure provision with land use.
33. Waikato Regional Airport Limited submitted on the recent Future Proof Strategy, seeking recognition of the Northern precinct in the Strategy. However, as the lodgement of the Northern Precinct Plan Change (to the Waipa DC) was known to be imminent, Future Proof elected not to make a decision/recognise this area in the Strategy as it was more appropriate that the RMA plan change process was resolved before consideration of any recognition in the Strategy.

## Transport

34. Hamilton City Council’s Long-Term Plan ensures our transport network integrates different modes of transport including freight, rail, private vehicles, buses, biking, micro-mobility and walking. We manage and operate the transport network and work to manage demand on the system ensuring the maintenance and renewal of existing transport infrastructure as well as plan and invest in new transport infrastructure. Meeting our legislative obligations relating to the way we manage the road corridor and transport network within our boundaries is key and will need to take strong consideration of regional linkages to ensure Hamilton’s vitality is sustained.
35. The MSP recognises Transport as one of the largest shapers and influencers of land use and the metropolitan-scale network will improve access and connectivity across the metro area. Hamilton City’s proximity to the Airport means that the transport effects that would result from this plan change are likely to be significant for Hamilton City Council and its obligations as a road controlling authority.
36. Hamilton City Council seek to ensure a safe and efficient transport network in and around the Airport precinct which also takes account of planned growth within the wider catchment.



Transport is a key enabler of economic development. If this plan change site is not well serviced by a safe and efficient transport network, then the economic potential of rezoning this area is unlikely to be fully realised. This economic benefit extends beyond the Airport company itself, in terms of attracting new businesses to the sub-region and providing new jobs.

37. To implement the MSP, a Transport Programme Business Case has recently been completed. This sets a very clear direction on transport links to the Airport node, especially the provision of PT. It would be beneficial for the Proposal Plan Change to respond to and align with these directions.

## Wastewater

38. Our Long-Term Plan ensures there is reliable and sustainable wastewater services to protect both the health of our people and our waterways, which includes collection, treatment and disposal of wastewater in a safe, healthy and sustainable way.
39. The Southern Metro Wastewater Detailed Business Case (DBC) recommended a preferred option for wastewater treatment in the catchment. This option includes the construction of a new Wastewater Treatment Plant (WWTP) in the south of Hamilton and connecting the villages of Matangi and Tamahere in time. The DBC has been endorsed by the three partner councils (Hamilton City, Waipā District and Waikato District) and Waikato-Tainui as sub-regional partners.
40. The preferred option has a number of stages. The proposed capacity of Stage 1 is based on the extent of land currently developed or consented in and around the Airport and:
- Avoids investment in short-term servicing solutions that do not achieve the agreed investment objectives, including many packaged treatment plants, or storage and tankering options that do not provide longterm sustainable solutions.
  - Provides certainty for land use planning and development.
  - Provides for wastewater reticulation and conveyance systems in and around the Airport that supports land development and is compatible with the medium to long-term wastewater servicing solution for the Waikato Metro Area.
  - A new site and WWTP offers the opportunity to masterplan an operationally efficient treatment facility future proofed to provide for growth and future demands. A buffer area around the WWTP will be required to mitigate potential visual, odour and noise issues.
41. The DBC is anchored on the assumption that the Waikato Regional Airport will be serviced by the Southern Wastewater Treatment Plant. It is the partner councils intention to deliver the Southern WWTP in the foreseeable future to avoid the need for the Airport to invest in a private package plant solution that only services their site.
42. Hamilton City Council, as the lead council in the process, has commenced pre-implementation activities, including appointing a Project Manager and developing project documentation, establishing a Project Governance Framework with mana whenua, and commissioning a site feasibility and due diligence assessment across a number of shortlisted sites. Council intends to quickly move to securing the preferred site and the necessary designations and resource consents to enable Stage 1 of the WWTP to be constructed in a timely manner.
43. Council supports the indications given within the Plan Change in which the Airport is committed to connecting to the Southern Wastewater Treatment Plant when it is available but seek that these commitments be strengthened.



## Land Use and Retail Activities

44. The Airport Northern Precinct extension should aim to attract a complementary range of high-value industrial activities such as logistics, specialised manufacturing, airside and related aeronautical activities to leverage off its locational advantages. To achieve this, it is critical that a strong rule framework is put in place to a) ensure a high-quality amenity industrial environment is created in line with the MSP and b) that non-industrial activities and industrial activities that do not align with providing first and foremost industrial land for industrial activities are discouraged from locating here. The objective for the zone seeks to combine business, industrial, retail and offices. In our view this needs to be refocused.
45. We also believe there is a risk associated with the permissive nature of the proposed rule framework that it will lead to a sub-optimal mix of land use activities in a strategic location. Low value industrial activities have a risk over time of driving out or deterring higher value industrial activities to co-locate. We believe the rule framework needs to be significantly strengthened to reflect a new, refocused objective for the Plan Change area.
46. While we are supportive of ancillary retail activity, we believe given the additional 5,000m<sup>2</sup> of non-terminal retail/commercial services proposed from 5,300m<sup>2</sup> to 10,300m<sup>2</sup> and the increased size of the Airport Business zone, that stronger thresholds are required to limit the extent of this relative to the size of the primary activity that could potentially occur across the wider zone.
47. We support the aspects of the plan change relating to landscaping and believe the visual aspect of the Northern precinct is in line with similar industrial precincts within the region. The setbacks and landscape depths which include minimum heights for specimen trees and screening vegetation is appropriate in addressing the need for a quality visual aesthetic.
48. One of our key concerns is regarding the proposed retail area reflected in the proposed structure plan. A boundaryless approach to planning for growth across the Future Proof sub-region should be recognised to ensure commercial and industrial development is located in key growth areas and that its location does not undermine the areas of influence of established centres. The Northern Precinct area is in close proximity to the Glenview centre, the planned Peacocke suburban centre, and the Tamahere Village centre. The form, function and location of these centres mean that they are best suited to cater to local day-to-day needs of residents living in these areas. The retail offering proposed in the Northern Precinct must be limited in GFA and range of activities to only service the day-to-day needs and demand generated from within the Northern Precinct. If a greater allowance for GFA is enabled than what is required to support the Precinct alone risks undermining the vitality of other centres, the range of services they offer, which would in turn lead to increased trip generation to alternate centres.
49. A commercial centre is planned within Peacocke, this is proposed to be 4.1 ha and can accommodate 12,700m<sup>2</sup> GFA. The range of activities at this centre is proposed to include a supermarket, office, retail, medical, and other service activities to cater for the community's day-to-day needs and offer some employment opportunities. Existing nearby commercial centres include Glenview with an existing 11,880m<sup>2</sup> GFA situated approximately 5km from the Airport Northern precinct and Tamahere with 2,000m<sup>2</sup> of GFA situated approximately 4km from the Northern precinct.
50. The Operative Hamilton City Council District Plan has a well-established Centres Hierarchy which was borne out of the previous district plan review in 2012. This hierarchy sought to re-establish the central city's primacy as the key centre for the sub-region and where office, retail and higher order services are predominantly located. This policy approach has limited out-of-centre developments occurring, instead directing retail, office and accommodation activities to primarily occur within the central city. This has boosted the vibrancy, amenity and economic viability of the central city and supported the realization of the benefits of agglomeration.

51. Allowing a retail GFA allocation greater than the day-to-day demand created from within the Northern Precinct would undermine the centre's hierarchy and be in conflict with the direction set out in the MSP, Future Proof (2022) and contrary to Policy UFD-P13 of the Waikato Regional Policy Statement. Given the proximity of Proposed Private Plan Change 20 to Hamilton, the effects on existing and planned centres within Hamilton are likely to be most acute.
52. The Northern Precinct's Economic Assessment Report suggests that the proposed 5,000m<sup>2</sup> gross floor area (GFA) cap of non-ancillary retail in the Northern Precinct is relatively insignificant in relation to Hamilton's City centre. We disagree for the reasons set out above and believe further analysis is required to justify the quantum and range of activities enabled in the context of overall GFA demand in response to local growth projections for the MSP area.
53. We believe the geographic extent of Proposed Private Plan Change 20 should be reconsidered. We believe that the plan change area should extend to include the properties in the north-western corner bounded by the Southern Links Designation. Currently, the road layout in the indicative structure plan does not anticipate this area of land becoming industrial in future and therefore risks it being land-locked in future. Inclusion of this area would achieve a range of beneficial outcomes including enabling integrated master planning to occur and providing certainty to nearby property owners of the future uses from day one.

## Bats and Bat Habitat

54. The Waikato Bat Alliance (Alliance) is a partnership between Waikato-Tainui, THaWK, Ngā Iwi Tōpū O Waipā, Waikato Regional Council, Hamilton City Council, Waipā District Council, Waikato District Council, and the Department of Conservation. In establishing the Alliance, the group agreed its role was "to coordinate the collaboration of its members (all with a mandate to protect bat habitat or the bats themselves) and engage productively with stakeholders maximising opportunities to achieve its vision".
55. The need for a coordinated regional approach to bat and bat habitat protection was recently highlighted through the resource consent process for the Amberfield development in Peacocke, and the recent Hamilton City Council Peacocke Plan Change 5 – Peacocke Structure Plan. Both processes emphasised the need to work more collaboratively and develop a unified approach to protecting bat habitat at a landscape scale.
56. Hamilton City Council supports the Airport Plan Change, including measures that require an appropriate consideration of bat habitat protection, restoration and enhancement to assist in ensuring the continued presence of the Long-Tailed Bat in the area. This may include biodiversity mitigation, offset or compensation to address the loss of bat habitat.

## Further Information and Hearings

57. Should Waipā District Council require clarification of the submission from Hamilton City Council, or additional information, please contact **Mark Davey** (City Planning Unit Manager) on 07 838 6995 or email [mark.davey@hcc.govt.nz](mailto:mark.davey@hcc.govt.nz) in the first instance.
58. Hamilton City Council **do wish** to speak at the hearings of Waipā District Council in support of this submission.

Yours faithfully



**Lance Vervoort**  
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## Appendix 1: Submission Points Table

**Table 1: Transport**

Issue	Description of Issue/Concern	Reasons for submission	Relief Sought
<b>Southern Links</b>	<ul style="list-style-type: none"> <li>Full or staged delivery of Southern Links is a key enabler for future expansion of the Airport Precinct</li> <li>Without this new corridor being fully constructed the local road networks performance may be compromised through additional demand created by the Northern Precinct build-out</li> </ul>	<ul style="list-style-type: none"> <li>The long-term viability and 'market attractiveness' of industrial zoning in this location is likely to be affected if efficient and effective road connections are not provided.</li> <li>There are a number of pinch-points with the existing network – while some of these can be mitigated through interventions e.g. intersection upgrades, there will be an overall decline in network performance.</li> <li>In the absence of Southern Links, increased vehicle movements and heavy vehicle freight movements will be pushed onto local and urban road networks – these will negatively affect the urban amenity of areas such as Glenview (SH3/Ohaupo Road)</li> </ul>	<ul style="list-style-type: none"> <li>Re-modelling is undertaken to update the baseline based on current demand and various scenarios are run based on different land-use activities within Northern Precinct.</li> <li>Confirm if modelling takes account of the build-out of Peacocke (Plan Change 5)</li> <li>Based on revised modelling scenarios, re-consider plan change triggers, based on Northern Precinct build-out relative to Southern Links construction.</li> </ul>

Issue	Description of Issue/Concern	Reasons for submission	Relief Sought
<b>Walking and Cycling Connectivity</b>	<ul style="list-style-type: none"> <li>Proposed new walking and cycling shared path connecting Peacocke Road to the Northern Precinct via Middle Road and Faiping Road</li> <li>Providing a new walking and cycling facility along Faiping Road does not align with HCC future plans for this area. We are also unclear how this would be funded and delivered.</li> <li>The grades on Faiping Road may mean that cycling is not attractive for commuter cyclists.</li> <li>Section 5.6 of ITA states that the shared path should be 3m wide for the full length to cater for e-bike speeds. However, this is not included in the provision table.</li> <li>There is limited evidence to suggest the level of demand/patronage would support the investment required for this type of solution, in the short-term, prior to the construction of southern links. An on-demand PT service is likely to be more practical short-term solution.</li> <li>Data showing where the future labour force might reside would help inform where and what type of PT and walking/cycling solution is required – determining the origin of trip destination of employees to the Northern Precinct is critical.</li> </ul>	<ul style="list-style-type: none"> <li>Results in a treatment which does not align with HCC's future land use intentions in particular on Faiping Road (i.e. Waste-water treatment plant).</li> <li>Faiping Road grades at the northern end are steep which means that commuter cyclists may not use this route. This could result in investment which may not be used.</li> <li>Proposed shared path will end at Peacocke Road. Therefore, it is not a safe and continuous route for commuters or the rural residential residents on Faiping or Middle Road travelling further north within Peacocke.</li> </ul>	<ul style="list-style-type: none"> <li>Walking and cycling connection should be continuous to urban centre within Peacocke or delayed until there is a safe connection along Peacocke Road.</li> <li>We seek clarity regarding how a walking cycling solution would be funded and delivered.</li> <li>There may be scope to provide an alternative connection to Faiping Road with the use of the watercourse buffers or alternatively provide a connection from Narrows Road through to Peacocke Road parallel to the Southern links designation (refer to Appendix 3). This route assumes that in the interim the route will also be used as a recreational route prior to development in Peacockes. Further investigation is required. HCC is open to working with the proposed plan change proponent and Waipa District Council on a solution if this option is deemed viable.</li> <li>Travel demand analysis is undertaken to understand likely origin of employee trips to the Northern Precinct from across the sub-region in order to inform the required PT and walking-cycling interventions.</li> </ul>

Issue	Description of Issue/Concern	Reasons for submission	Relief Sought
<b>Public Transport</b> <ul style="list-style-type: none"> <li>Short Term (2-7years), Pre-Southern Links, Northern Precinct Spine Road not connected between SH3 and Raynes Rd.</li> </ul>	<ul style="list-style-type: none"> <li>Provision for bus stops both sides of SH 3. However, no details of crossing facilities and paths to accommodate pedestrians walking to and from the bus stops to the site are provided</li> <li>Provision for future bus route serving the Peacocke Structure Plan Area into Raynes Road to the Airport and Titanium Park precincts then back to Hamilton via SH3. This service may not be attractive if it is not direct for commuters.</li> </ul>	<ul style="list-style-type: none"> <li>Details of crossing facilities and paths connecting the site to the bus stops is unclear.</li> <li>Unclear if bus bay and bus stop can be accommodated within the road reserve</li> <li>At-grade crossing within a 100km/h speed limit is not considered to be safe or appropriate.</li> <li>Proposal needs to provide appropriate PT facilities to and from the Northern Precinct to encourage mode shift.</li> </ul>	<ul style="list-style-type: none"> <li>Provisions table or PDA needs to specify footpath connection and form of SH3 crossing.</li> <li>Need to provide safe crossing facility on SH3 to support proposed bus stops.</li> <li>May need to review speed limit if pedestrians are crossing SH 3.</li> <li>Confirm what public transport infrastructure will be provided within the internal road network to encourage mode shift in the short term. For example, will bus stops and shelters be provided when the internal roads are constructed?</li> <li>Make provision for a primary PT node within the Hub and ensure planning provisions require built form is designed to support use.</li> </ul>
<b>Public Transport</b> <ul style="list-style-type: none"> <li>Medium Term (7-15 years), Pre-Southern Links, Northern Precinct Spine Road connected between SH3 and Raynes Rd</li> </ul>	<ul style="list-style-type: none"> <li>Public transport service connecting Hamilton via SH3 and Ohaupo Road to the Airport and surrounding Airport Business Zone.</li> <li>A potential future service serving the Peacocke Structure Plan Area and Airport/Titanium Park precincts via Peacocke Road, Faiping Road and Middle Road</li> <li>Investigation of Faiping Road for public transport.</li> </ul>	<ul style="list-style-type: none"> <li>Results in a use of Faiping Road which does not align with HCC's future intentions.</li> <li>If the journey results in longer than expected travel times, then the service may not be attractive for users and will not result in mode shift.</li> <li>Unclear if grades along Faiping Rd are acceptable for buses (there is an existing sign warning of steep grades).</li> </ul>	<ul style="list-style-type: none"> <li>Consider alternative routes if Faiping Road cannot be used.</li> <li>Provisions table or PDA needs to specify infrastructure required to facilitate the medium-term option</li> </ul>
<b>Public Transport</b> <ul style="list-style-type: none"> <li>Long term (15-30 years), Southern Links Arterials, Northern Precinct Spine Road</li> </ul>	<ul style="list-style-type: none"> <li>Use of Southern Links corridor for a public transport connection to the Airport</li> <li>New strategic road connection to the central interchange.</li> </ul>	<ul style="list-style-type: none"> <li>Unclear how this strategic connection will be limited to public transport only. May result in additional vehicular traffic at the interchange.</li> <li>No assessment has been provided to assess the effects of this connection to the interchange.</li> <li>Relies on third parties to provide the infrastructure.</li> </ul>	<ul style="list-style-type: none"> <li>Provisions table or PDA needs to specify infrastructure required to facilitate the long-term option</li> </ul>

Issue	Description of Issue/Concern	Reasons for submission	Relief Sought
<b>Ingram Road</b>	<ul style="list-style-type: none"> <li>Current structure plan indicates access via Ingram Road</li> <li>Figure 2 of the ITA shows no access through to the SH3/21 roundabout via Ingram Road.</li> <li>Alternative options provided i.e. new roundabout at SH 3 and a restricted movements intersection on Raynes Road.</li> <li>Future could result in left-in/left-out movements at Ingram Road/SH3 intersection.</li> <li>No details on walking and cycling connections on Ingram Road have been provided.</li> </ul>	<ul style="list-style-type: none"> <li>Likely effects on Waipa DC and Waka Kotahi.</li> <li>There will be benefits with providing walking and cycling connections to and from Ingram Road and the proposed Northern Precinct as well as the bus stops proposed on SH3.</li> <li>It's unclear what the implications are at the SH3/ Ingram Rd intersection, but relates to existing zoned development and related to H3</li> </ul>	<ul style="list-style-type: none"> <li>Provide a walking and cycling connection from Ingram Road to the Northern Precinct access on SH 3 and the bus stops proposed on SH 3.</li> </ul>
<b>Raynes Road</b>	<ul style="list-style-type: none"> <li>The proposal results in a new access onto Raynes Road which is contrary to the WDC District Plan rules and current Airport Business Zone Structure Plan.</li> </ul>	<ul style="list-style-type: none"> <li>May result in additional traffic on surrounding HCC roads prior to urbanisation of the Peacockes Road network.</li> <li>The predicted increase in traffic on Raynes Rd is unclear</li> </ul>	<ul style="list-style-type: none"> <li>Applicant should confirm the scale of traffic increase on Raynes Road north of the Narrows Road/Raynes Road intersection.</li> <li>Confirm what mitigation is required to address the effects of the increase in traffic on Raynes Road.</li> </ul>
<b>Proposed Northern Precinct/Raynes Road intersection</b>	<ul style="list-style-type: none"> <li>The proposal includes a new priority controlled intersection on Raynes Road with left out and right in movements banned.</li> <li>The current alignment of intersection and development road means that banning left turn movements out for light vehicles will be difficult.</li> <li>Could result in light vehicles turning left onto Raynes Road and heading to Hamilton via Peacocke Road.</li> <li>Will require removal of intersection to allow for proposed future intersection once Southern Links is completed.</li> </ul>	<ul style="list-style-type: none"> <li>Vehicles may try and turn left out onto Raynes Road instead of using the SH3 roundabout intersection as layout does not prevent left turn by cars.</li> <li>Could result in additional left turning vehicles than what is anticipated</li> <li>Could result in unanticipated effects at the Raynes Road/SH3 intersection and on Peacockes Road.</li> <li>Potential for u-turns on Raynes Rd at the end of the proposed islands</li> </ul>	<ul style="list-style-type: none"> <li>This layout could be in place for a significant period of time as construction of Southern Links is not currently funded</li> <li>Concerned that proposed layout will not be effective and more traffic than expected will use Raynes Rd north and west of the intersection.</li> <li>Consider further physical interventions to restrict turning through design changes. This could include realignment of the connection into the Northern Precinct or investigation in other forms of traffic control i.e. signals (with RSP) to enforce movements bans.</li> <li>Consider construction of the permanent future intersection on the realigned Raynes Rd to provide access into the Northern Precinct from Raynes Road.</li> </ul>



Issue	Description of Issue/Concern	Reasons for submission	Relief Sought
<b>Future connection to Realigned Raynes Road/Narrows Road Intersection</b>	<ul style="list-style-type: none"> <li>Proposal states that once Southern Links is complete the Raynes Road left-in/right-out intersection will be removed and replaced with a new intersection. However, the form of this intersection is unclear.</li> <li>Future intersection may lead to additional trips within the HCC local road network through the Peacocke Structure Plan area if the proposed design does not discourage these movements.</li> </ul>	<ul style="list-style-type: none"> <li>The future intersection form once Southern Links is completed is uncertain. This may potentially result in additional traffic on Raynes Road heading north.</li> <li>Additional traffic on Raynes Road heading north may put additional pressure on the HCC local road network within the Peacocke Structure Plan area</li> </ul>	<ul style="list-style-type: none"> <li>The effects on Raynes Road are unclear and no upgrade/ changes are proposed to Raynes Rd</li> <li>Confirm future intersection form. Including if turning restrictions will be applied to this intersection as well.</li> <li>Confirm future effects and if mitigation is required once Southern Links is constructed and the new connection to the Northern Precinct is provided.</li> </ul>
<b>Raynes Road/SH21 Intersection</b>	<ul style="list-style-type: none"> <li>ITA states that up to 70ha of development could be accommodated by a single lane roundabout.</li> <li>Once 70ha is exceeded then capacity upgrades at the intersection are required.</li> <li>Capacity upgrades are unlikely to be as straightforward as adding additional lanes to the roundabout. Careful consideration of vehicle tracking, sight distance and fastest path geometry will be required. This could result in significant construction works.</li> </ul>	<ul style="list-style-type: none"> <li>If delays and queues become excessive prior to capacity increases at the roundabout then vehicles may use alternative routes which could include routes through HCC's local road network.</li> <li>Vehicles may detour via HCC local roads during any capacity improvement works at the future SH21/Raynes road roundabout putting pressure on the local road network.</li> </ul>	<ul style="list-style-type: none"> <li>Consider providing a dual lane roundabout at the outset to minimise effects during construction to upgrade roundabout from single to dual lane.</li> </ul>
<b>SH3/ Northern Precinct Roundabout</b>	<ul style="list-style-type: none"> <li>The proposal is for a new roundabout on SH3 approximately 350m north of the Ingram Road intersection.</li> <li>Change in speed limit may be required</li> </ul>	<ul style="list-style-type: none"> <li>The roundabout appears to be located in the best practicable location.</li> <li>Not detail of facilities to support PT – pedestrian facilities or bus stop</li> <li>If this access is not attractive, then commuters may choose alternate routes which may result in pressure on other parts of the transport system that may not have been accounted for.</li> </ul>	<ul style="list-style-type: none"> <li>Confirm details of proposed roundabout including: <ul style="list-style-type: none"> <li>If there is likely to be a change in speed limit at this location,</li> <li>location of bus stops</li> <li>If pedestrian facilities are to be provided to support access to bus stops. If so, what form of pedestrian facilities will be provided.</li> <li>Confirmation of approach grades to future Southern Links alignment</li> </ul> </li> </ul>

Issue	Description of Issue/Concern	Reasons for submission	Relief Sought
<b>Future Connection to Southern Links</b>	<ul style="list-style-type: none"> <li>Section 5.8 of the ITA states that the Applicants propose a new strategic transport link connecting the Southern Links Central Interchange directly to the Airport Hub via the Northern Precinct Spine Road</li> <li>The direct access connection to Southern links will be for accessing future PT, walking and cycling and freight</li> </ul>	<ul style="list-style-type: none"> <li>Typically, five leg roundabouts are considered undesirable.</li> <li>The effect is related to Waka Kotahi and the Southern Links Designation</li> </ul>	<ul style="list-style-type: none"> <li>Effects relate to Waka Kotahi designation not on HCC.</li> </ul>
<b>Peacockes Road</b>	<ul style="list-style-type: none"> <li>Development could increase traffic on Peacocke Road if proposed infrastructure upgrades are not attractive or commuters do not comply with proposed turning movement restrictions.</li> </ul>	<ul style="list-style-type: none"> <li>Risk of additional traffic on Peacockes Road in particular if intersections such as the Raynes Road intersection are not well designed to restrict movements to and from the north.</li> <li>The effects could occur prior to full urbanisation of Peacockes Road.</li> <li>Even if traffic exits the plan change area through the proposed new SH3 roundabout they will still be able to access Peacocke Rd via Raynes Rd</li> </ul>	<ul style="list-style-type: none"> <li>Confirm the likely scale of increase in traffic on Peacockes Road as a result of the development.</li> <li>Confirm if any mitigation is required to address the increase in vehicles on this corridor.</li> </ul>
<b>SH 3/Raynes Road Roundabout</b>	<ul style="list-style-type: none"> <li>Preferred option in BBO ITA to accommodate full development is for a secondary through lane on the northbound approach.</li> <li>The intersection improvements planned are based on a single lane roundabout with the focus of improving safety at the intersection.</li> </ul>	<ul style="list-style-type: none"> <li>Current concept design is for a single lane roundabout which could result in efficiency issues at the Raynes Road intersection and SH3.</li> <li>Clarity needed as to what intersection form is required to accommodate the development. The need for the additional lane is not clearly stated in the provisions.</li> </ul>	<ul style="list-style-type: none"> <li>Transport provisions table needs to be more specific and detail what form of roundabout is required to accommodate the traffic from the development.</li> <li>Transport provisions are unclear on what the proposed intersection form is i.e. is the change limited to dual approach lanes for northbound traffic.</li> </ul>

Issue	Description of Issue/Concern	Reasons for submission	Relief Sought
<b>SH3/Normandy Avenue Intersection</b>	<ul style="list-style-type: none"> <li>There could be an increase in traffic at this intersection as a result of the proposed plan change.</li> <li>The modelling indicates LOS A-B at the intersection during AM and PM peak post development</li> </ul>	<ul style="list-style-type: none"> <li>Assessment provided in the ITA. However, there is risk that the ITA may underestimate queues and delays at the intersection.</li> <li>There is a lot of competing priorities on these networks, giving rise to conflicts between freight movement, pedestrians, cyclists etc. These are critical parts of the network which already under significant pressure.</li> <li>Increasing the vehicle movements/thoroughfare in these urban environments and intersections is likely to detract the urban amenity and the safety for cyclists and pedestrians.</li> </ul>	<ul style="list-style-type: none"> <li>Confirm the scale of traffic increase expected at the intersection.</li> <li>Provide an assessment of effects of this intersection as a result of the plan change.</li> <li>Confirm if any mitigation is required to address the increase in vehicles at this intersection</li> <li>Implement required mitigation to ensure these intersections are not adversely affected.</li> </ul>
<b>SH3/Saxbys/Tomin Intersection</b>	<ul style="list-style-type: none"> <li>There could be an increase in traffic at this intersection as a result of the proposed plan change.</li> </ul>	<ul style="list-style-type: none"> <li>No assessment is provided in the ITA. The effects at this intersection are uncertain.</li> <li>There is a lot of competing priorities on these networks, giving rise to conflicts between freight movement, pedestrians, cyclists etc. These are critical parts of the network which already under significant pressure.</li> <li>Increasing the vehicle movements/thoroughfare in these urban environments and intersections is likely to detract the urban amenity and the safety for cyclists and pedestrians.</li> </ul>	<ul style="list-style-type: none"> <li>Confirm the scale of traffic increase expected at the intersection.</li> <li>Provide an assessment of effects of this intersection as a result of the plan change.</li> <li>Confirm if any mitigation is required to address the increase in vehicles at this intersection</li> <li>Implement required mitigation to ensure these intersections are not adversely affected.</li> </ul>
<b>Ohaupo Road</b>	<ul style="list-style-type: none"> <li>The proposal could increase the number of trips on Ohaupo Road.</li> <li>The effects prior to Southern Links are not clear.</li> </ul>	<ul style="list-style-type: none"> <li>Potential for increased traffic within HCC as a result of the development.</li> <li>The scale of increase is unclear.</li> <li>Increasing the vehicle movements/thoroughfare in these urban environments and intersections is likely to detract the urban amenity and the safety for cyclists and pedestrians.</li> </ul>	<ul style="list-style-type: none"> <li>Confirm the scale of traffic increase expected on Ohaupo Road (north of Raynes Rd) as a result of the Northern Precinct Development. Provide an assessment of effects of on this corridor as a result of the plan change.</li> <li>Confirm if any mitigation is required to address the increase in vehicles on this corridor.</li> <li>Implement required mitigation to ensure the urban amenity of this road corridor is not adversely affected.</li> </ul>

Issue	Description of Issue/Concern	Reasons for submission	Relief Sought
<b>Trip Generation Assessment</b>	<ul style="list-style-type: none"> <li>The ITA adopts a total trip generation of 2,500 veh/hr.</li> <li>The trip generation assessment in Table 5 states that the proposal could generate 2,560 veh/hr</li> <li>The Northern Precinct includes non-ancillary retail of up to 5,000m<sup>2</sup> which has been assessed at 4 trips/ 100m<sup>2</sup> GFA/ hr. Depending on the type of retail that is established in the area the trip generation assessment may underestimate the trips generated by the retail activity.</li> <li>The plan provisions include ancillary office and ancillary retail as a permitted activity within the Airport Business Zone.</li> <li>Non-ancillary retail is limited to within the Hub/retail area in the Airport Business Zone Structure Plan area and a total area of 5,000m<sup>2</sup>.</li> </ul>	<ul style="list-style-type: none"> <li>The trip generation rate of 20.9 trips/ha (dev)/hr for the industrial activities is considered to be reasonable for the industrial activities and is considered conservative.</li> <li>Potential for increased traffic on surrounding roads if retail activities generate more than what the ITA anticipates. The ITA anticipates trip generation of 4 trips/100m<sup>2</sup> GFA/hr. Based on published trip generation rates a retail shop<sup>1</sup> could generate 42.5 trips/100m<sup>2</sup> GFA or a medium sized shopping centre<sup>2</sup> could generate 17.2 trips/100m<sup>2</sup> GFA</li> <li>Depending on what retail activities are proposed, the retail activities may be attractive for residents in Peacockes which could result in more trips to the Northern Precinct from the Peacockes area.</li> </ul>	<ul style="list-style-type: none"> <li>There are provisions that limit retail to being within the Hub and a total cap of 5,000m<sup>2</sup>.</li> <li>However, could still apply for retail failing those rules as a non-complying activity.</li> <li>The ITA assessment may underestimate retail trips. Further sensitivity testing of the retail activity is sought to determine the effects of higher retail trip generation activities proposed within the Northern Precinct.</li> <li>Confirm if further mitigation is required to address the effects of higher trip generating activities developing within the Northern Precinct.</li> </ul>
<b>Internal road Layout</b>	<ul style="list-style-type: none"> <li>The internal road layout includes a central spine road, a local road and internal road connections.</li> <li>The spine road will function as a collector road and will provide a connection to the site from the SH3 roundabout and the Raynes Road intersection.</li> </ul>	<ul style="list-style-type: none"> <li>The Northern Precinct is located within in a strategic sub-regional area. It is important to ensure that development includes appropriate infrastructure including appropriate roads and walking and cycling facilities to support mode shift.</li> <li>The internal road layout is considered appropriate. However, the layout results in multiple cross-roads intersections.</li> <li>Crossroads intersections are typically considered undesirable and staggered intersections are preferred. Where a crossroads intersection is unavoidable then a roundabout should be constructed.</li> </ul>	<ul style="list-style-type: none"> <li>No relief sort as part of the plan change process but confirmation of internal intersections will be required at the consenting stage.</li> <li>Where possible crossroads intersections should be avoided but if crossroads intersections cannot be avoided then a roundabout should be provided.</li> <li>An alternative to a roundabout would be to provide raised safety platforms or raising the intersection.</li> <li>The internal road layout needs to accommodate for future road closures as a result of Southern Links construction and operation.</li> </ul>

<sup>1</sup> Waka Kotahi Research Report 453, Table C.1

<sup>2</sup> Waka Kotahi Research Report 453, Table C.1 – medium size shopping centre is 4,001-10,000m<sup>2</sup> GFA

Issue	Description of Issue/Concern	Reasons for submission	Relief Sought
<b>Spine Road Sections</b> (Primary) Cross	<ul style="list-style-type: none"> <li>The cross section consists of: <ul style="list-style-type: none"> <li>26m Road reserve</li> <li>7m carriageway</li> <li>3m shared path</li> </ul> </li> <li>No on-street parking is provided</li> <li>No on-road cycling facilities are provided</li> <li>The proposed spine road does not include any facilities to facilitate turning movements. It is unclear whether direct property access will be provided via the Spine Road. Given the likely mix of heavy and light vehicles there is a safety risk associated with not providing any turning facilities.</li> <li>Unclear what the likely posted speed will be</li> <li>Gateway</li> </ul>	<ul style="list-style-type: none"> <li>The Northern precinct is located within in a strategic sub-regional area. It is important to ensure that development includes appropriate infrastructure including appropriate roads and walking and cycling facilities to support mode shift.</li> <li>We support the provision of walking and cycling facilities within the Spine Road. The proposal includes 3m shared paths however, there may be a greater mix of active modes users in the future i.e. electronic scooters, e-bikes along with pedestrians.</li> </ul>	<ul style="list-style-type: none"> <li>Provide additional space for active modes and micro mobility users so all users can use the space safely. The options that could be considered include providing 4m wide shared paths or providing separated cycle facilities on both sides of the road.</li> <li>Confirm the likely posted speed on the spine road.</li> <li>Confirm if direct property access is provided for from the spine road, if so, we seek that this is limited</li> </ul>

Issue	Description of Issue/Concern	Reasons for submission	Relief Sought
<b>Local Road Cross Sections (Secondary)</b>	<ul style="list-style-type: none"> <li>The cross section consists of: <ul style="list-style-type: none"> <li>22.5m Road reserve</li> <li>9.5m carriageway including a 2.5m median</li> <li>1.5m footpaths on both sides</li> </ul> </li> <li>No cycling facilities are proposed on the local road</li> <li>No on-street parking facilities are proposed on the local road</li> <li>Unclear what the likely posted speed will be. The ITA (Section 5.5) states that <i>low speeds and volumes on such roads means cyclists are intended to share the road with vehicles.</i></li> </ul>	<ul style="list-style-type: none"> <li>The Northern Precinct is located within in a strategic sub-regional area. It is important to ensure that development includes appropriate infrastructure including appropriate roads and walking and cycling facilities to support mode shift.</li> <li>The local road does not include cycling facilities which means that cyclists would have to cycle in the lane. This is undesirable given the likely presence of heavy vehicles.</li> <li>The lack of cycling facilities within the internal local road network creates a safety risk for cyclist and it may also deter commuters from cycling to site which is undesirable and would not assist with achieving mode share objectives and goals</li> <li>The proposed footpaths are 1.5m wide which are considered to be too narrow.</li> <li>Potential for vehicles to park within the traffic lane resulting in potential safety risks in particular for on-road cyclists.</li> </ul>	<ul style="list-style-type: none"> <li>Provide appropriate cycling facilities on the local road network to encourage mode shift. This could include providing mono directional cycleways on both sides of the road in addition to the footpaths or shared paths on both sides of the road.</li> <li>Provide wider footpaths. The 1.5m wide footpaths are considered to be too narrow. The footpaths should be 1.8m or wider.</li> <li>Confirm the likely posted speed on the local roads.</li> </ul>

Issue	Description of Issue/Concern	Reasons for submission	Relief Sought
<b>Internal Walking and Cycling Provisions</b>	<ul style="list-style-type: none"> <li>The ITA includes a map showing the primary, secondary and internal walking and cycling connections within the development. However, this map is not included in the Plan Provisions, nor shown on the structure plan map.</li> <li>Figure 10 of the ITA indicates that on most of the internal roads it is expected that cyclist will share the lane with vehicles.</li> <li>There is uncertainty on the likely posted speeds on the internal roads.</li> </ul>	<ul style="list-style-type: none"> <li>There is no framework included in the District Plan provisions which outline the proposed walking and cycling hierarchy and location of connections i.e. primary and secondary cycling routes and how these routes connect to the network.</li> <li>We have concerns that an appropriate level of service may not be achieved for cyclists if the only provisions within the local roads are for cyclists to share the road with vehicles. The lack of cycling facilities within the internal local road network creates a safety risk for cyclist and it may also deter commuters from cycling which is undesirable and does not assist with achieving mode share objectives and goals</li> </ul>	<ul style="list-style-type: none"> <li>Show the internal walking and cycling routes and hierarchy i.e. the primary and secondary routes on the structure plan maps.</li> <li>Confirm the likely posted speeds within the internal road network.</li> <li>Provide appropriate cycling facilities within the local road network to encourage mode shift. This could include providing mono directional cycleways on both sides of the road in addition to the footpaths or shared paths on both sides of the road.</li> <li>Include provisions that require the provision of end-of-journey facilities for all activities. This should include covered cycle stands, lockers, showers, etc</li> </ul>
<b>Staging</b>	<ul style="list-style-type: none"> <li>The ITA states that staging is not confirmed for the Northern Precinct, and it is unclear which access will be formed first (Raynes Road or the new SH3 roundabout).</li> <li>Details on the likely location of construction access is unclear as well</li> <li>No general traffic access is provided to Middle Road. However, walking and cycling access is provided to Middle Road</li> <li>There is a risk that key infrastructure may not be in place to accommodate traffic from the development. The Plan provision triggers are based on area irrespective of industrial vs retail land use. There is a risk that if a higher trip generating activities are established early then the infrastructure may not be suitable to accommodate the increase in traffic.</li> </ul>	<ul style="list-style-type: none"> <li>There is no clarity on the anticipated effects of access during the initial staged of the development</li> <li>If the Raynes Road access is constructed first then there is a risk of increased traffic within the HCC local road network.</li> <li>There is a risk that higher trip generating activities such as retail are established prior to key infrastructure being constructed.</li> </ul>	<ul style="list-style-type: none"> <li>Confirm which intersection will be constructed first for access into the Northern Precinct. HCC's preference would be initial access via a new SH3 roundabout.</li> <li>Provide a staging framework in the District Plan provisions which addresses the risk of high trip generating activities such as retail being established prior to key infrastructure being constructed to accommodate the additional traffic.</li> </ul>



Issue	Description of Issue/Concern	Reasons for submission	Relief Sought
<b>Narrows Bridge</b>	<ul style="list-style-type: none"> <li>The ITA does not include an assessment of effects at the Narrows Bridge.</li> <li>The existing bridge is narrow and already unattractive for walking and cycling trips. Adding additional traffic to the bridge is likely to make walking and cycling less attractive.</li> </ul>	<ul style="list-style-type: none"> <li>There is the potential for additional traffic may have adverse impacts on active modes in particular active mode commuters.</li> </ul>	<ul style="list-style-type: none"> <li>Confirm the scale of traffic increase expected at the Narrows Bridge.</li> <li>Confirm if any mitigation is required to address safety and efficiency concerns related to the increase in vehicles on the bridge.</li> </ul>
<b>Airport Road (SH21)</b>	<ul style="list-style-type: none"> <li>The Plan Change is likely to result in additional traffic on SH21.</li> <li>While the ITA provides an assessment of intersection on SH21 the effects of additional traffic on the corridor are unclear.</li> <li>Very limited walking and cycling facilities on SH21</li> </ul>	<ul style="list-style-type: none"> <li>Increase in traffic on SH21 may make alternative routes more attractive.</li> <li>This may result in commuters using other local roads which may not have sufficient capacity, or the infrastructure may not be appropriate to accommodate an increase in traffic.</li> </ul>	<ul style="list-style-type: none"> <li>Confirm the scale of traffic increase expected along SH21.</li> <li>Confirm if any mitigation is required to address safety and efficiency concerns related to the increase in vehicles on SH 21</li> </ul>

**Table 2: Land use and Retail**

Issue	Description of Issue/Concern	Reasons for submission	Relief Sought
<b>Land use activities within the Airport Business zone</b>	<ul style="list-style-type: none"> <li>The plan change area and wider Airport node is of significant strategic importance regionally.</li> <li>The composition of industrial activities must be complementary to the airside and aeronautical related activities.</li> <li>The industrial activities which occur in the PC20 area must be complementary to one-another</li> <li>Due to the proximity of Hamilton Airport to Hamilton City's urban area, there is a high-degree of co-dependence an interrelationship of land-use activities and functions.</li> </ul>	<ul style="list-style-type: none"> <li>HCC does not support low-value industrial activities occurring in this precinct.</li> <li>HCC also want to ensure that the planning provisions preclude non-industrial activities from occurring within the precinct</li> <li>Given the proximity to Hamilton city urban area, including Peacocke (Plan Change 5 to the Hamilton City Council Operative District Plan) it is important that the vitality of these local centres (eg Glenview, Central City) are maintained and enhanced, and not eroded by out of centre activities occurring in the Northern Precinct due to permissive rule/policy frameworks</li> <li>Accommodation activities which are intended to primarily service airport related activity should take place in close proximity</li> </ul>	<ul style="list-style-type: none"> <li>Develop Airport specific plan provisions through a precinct plan approach or other planning method to control activities to ensure only high-value and high-amenity industrial activities are enabled such as logistics, specialised manufacturing and airside related activities.</li> <li>Prevent "dirty industrial" activities from occurring.</li> <li>Consider provisions related to setbacks, building height, landscaping, hard-stand quantum's and internal site layout to ensure only high-value industrial activities occur and visual amenity is enhanced</li> <li>Residential and accommodation related activities are 'non-complying'.</li> <li>Ancillary retail activity shall not occupy more than 10% of GFA of the principal activity on the site.</li> <li>Office activities are 'non-complying' and ancillary offices are capped and/or controlled.</li> </ul>

		to the terminal – not in the Northern Precinct. Accommodation activities to support non-airport related activities should occur within the central city.	<ul style="list-style-type: none"> <li>The quantum of retail activities are capped to support only the day to day needs to the work force and visitors within the plan change area.</li> </ul>
<b>Retail activities within the Airport Business zone</b>	<ul style="list-style-type: none"> <li>Retail activities occurring in the Airport Business zone for non-industrial related purposes</li> </ul>	<ul style="list-style-type: none"> <li>HCC does not support non-industrial related activities occurring in the Airport Business zone as this would compete with existing and planned retail centres in relative close proximity.</li> <li>There is lack of evidence to demonstrate what level of retail activity has already been consented against the 5,300 GFA cap within the Airport Business Zones.</li> </ul>	<ul style="list-style-type: none"> <li>Limit maximum GFA in the northern precinct to a quantum which is commensurate with the local demand created by the day-to-day industrial activities as part of the PC20</li> <li>To justify the GFA quantum, a centres assessment and demand analysis is undertaken based on the profile of industrial activities which are likely to locate in the Northern Precinct and the number of employees who are likely to be working there.</li> <li>Update on how much retail GFA has been consented already out of the 5,300 in the Airport Business Zone</li> <li>Stage to retail development to ensure it is appropriately sequenced with the stages of the industrial development so local services and amenity are available from an early stage</li> <li>Ensure retail activities enabled are proportionate to the quantum of employment activities.</li> </ul>

<b>Amenity of Airport Business zone</b>	<ul style="list-style-type: none"> <li>• Amenity of the Northern precinct</li> </ul>	<ul style="list-style-type: none"> <li>• In order to attract and retain high-value businesses to this precinct, the amenity of the public and private realm is critical.</li> </ul>	<ul style="list-style-type: none"> <li>• Ensure generous setbacks of built form from road corridors, ensure landscaping treatment occurs within these setbacks</li> <li>• Limit vehicular access from main spine roads</li> <li>• Introduce precinct specific design controls to direct landscaping, signage, internal site layout etc</li> <li>• Ensure land is set aside at the key gateways to the site for signage and landscaping</li> </ul>
<b>Amenity of the 'retail area' and the Hub</b>	<ul style="list-style-type: none"> <li>• Amenity of the retail area and Hub</li> </ul>	<ul style="list-style-type: none"> <li>• It is important that the retail area and Hub is restricted to service only the needs of the day-to-day visitors of the precinct and does not generate/induce out of centre demand.</li> <li>• These retail nodes within the precinct are an attractive destination for those working within the precinct in order to avoid out of centre trips occurring.</li> </ul>	<ul style="list-style-type: none"> <li>• Introduce a masterplan with design specific controls and principles, with associated assessment criteria for the retail area and the Hub. Ensure visual contrast between industrial built form and these two proposed retail centres.</li> <li>• Undertake more in-depth economic analysis to determine the appropriate size of the retail centre and Hub (gross ha and GFA) – limit the total site area and GFA of both these areas accordingly in the plan provisions.</li> </ul>

<b>Protection for airside activities</b>	<ul style="list-style-type: none"> <li>There are no provisions which safeguard airside activities along the edge of the plan change area bordering the runway.</li> <li>We understand WRAL intend of retaining ownership as a mechanism to safeguard this land</li> </ul>	<ul style="list-style-type: none"> <li>The growth and demand for airport related activities is growing due to the strategic location of Hamilton Airport and the availability of land surrounding it.</li> <li>This is a unique point of difference for WRAL and the opportunity to attract new businesses to the sub-region.</li> </ul>	<ul style="list-style-type: none"> <li>An overlay method to control/safeguard land bordering the runway and the main spine road for airside activities</li> </ul>
<b>Extent of PC20</b>	<ul style="list-style-type: none"> <li>Based on the current proposed PC20 extent if accepted, an area of rural zoned land becomes 'land-locked' by Southern Links. This area includes 19 lifestyle blocks and covers approximately 42,3ha of land.</li> </ul>	<ul style="list-style-type: none"> <li>HCC are of the view that this land offers poor economic utility for rural activities given the current uses and fragmented ownership.</li> <li>A strategic view should be taken, that, over the long term, it makes sense for this area to also be industrial zoned. On this basis the plan change should respond to this.</li> <li>Certainty of future land use needs to be provided.</li> <li>We believe that the plan change area should extend to include the properties in the north-western corner bounded by the Southern Links Designation. Currently the road layout in the indicative structure plan does not anticipate this area of land becoming industrial in future and therefore risks it being land-locked in future.</li> </ul>	<ul style="list-style-type: none"> <li>The properties identified in Appendix 4 as part of the Proposal Plan Change be included in the process.</li> <li>Inclusion of this area would achieve a range of beneficial outcomes including enabling integrated master planning to occur with a roading pattern that responds accordingly which will provide certainty to nearby property owners of the future uses.</li> <li>Planning methods, such as an overlay, deferred zoning or staging with triggers be considered for the area of land labelled 'Northern Precinct B' in Appendix 4.</li> <li>Overcome accessibility issues in future into the rural area at the point when a change in zoning does occur.</li> <li>Avoid reverse sensitivity issues.</li> <li>Provide a natural defensible boundary.</li> </ul>

**Table 3: Wastewater**

Issue	Description of Issue/Concern	Reasons for submission	Relief Sought
<b>Connection to the Southern Wastewater Treatment Plant</b>	<ul style="list-style-type: none"> <li>The Northern Precinct must be serviced by a public wastewater solution</li> </ul>	<ul style="list-style-type: none"> <li>HCC supports a public infrastructure solution for the Northern Precinct. This represents a more sustainable long-term solution as opposed to private wastewater servicing solutions or a pump and truck solution.</li> <li>Given the strategic location of the Northern Precinct and the quantum of the plan change</li> </ul>	<ul style="list-style-type: none"> <li>Strengthen the plan provisions regarding requiring a public wastewater solution staging development to ensure water supply, wastewater and transport infrastructure with the necessary capacity is available prior to development therefore avoiding development not connected to a public reticulated wastewater network"</li> </ul>

		area, HCC support WRAL planning for a public wastewater solution from day one.	<ul style="list-style-type: none"> <li>Add triggers into the plan regarding the requirement to connect to a public wastewater treatment solution.</li> </ul>
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**Table 4: Ecology**

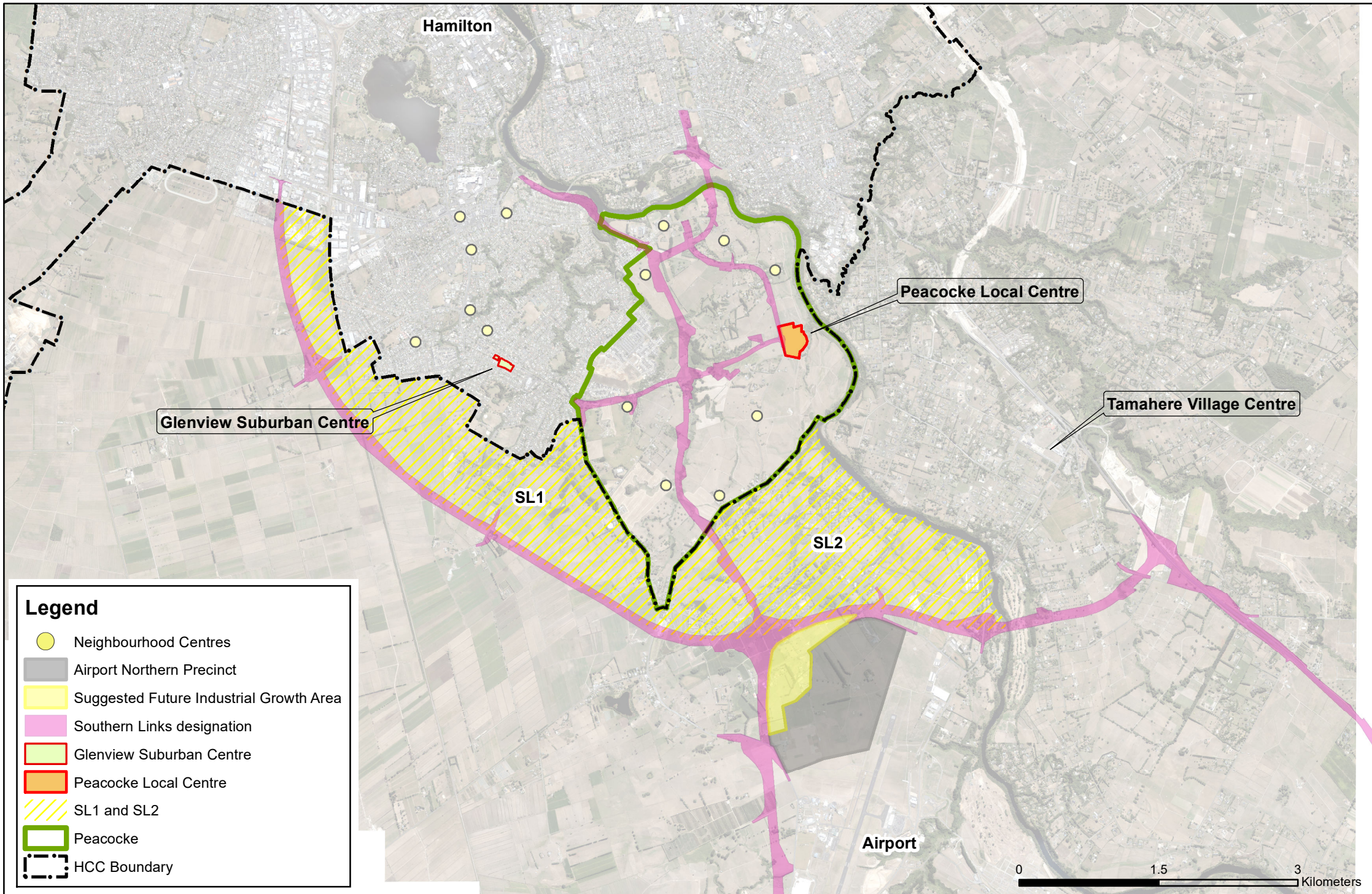
Issue	Description of Issue/Concern	Reasons for submission	Relief Sought
<b>Bats and Bat Habitat</b>	<ul style="list-style-type: none"> <li>The Northern Precinct will have to address how it is managing bats and bat habitat</li> </ul>	<ul style="list-style-type: none"> <li>HCC supports plan provisions which support the protection of bats.</li> <li>The need for a coordinated regional approach to bat and bat habitat protection was recently highlighted through the resource consent process for the Amberfield development in Peacocke, and the recent HCC Peacocke Plan Change 5 – Peacocke Structure Plan. Both processes emphasised the need to work more collaboratively and develop a unified approach to protecting bat habitat at a landscape scale.</li> </ul>	<ul style="list-style-type: none"> <li>Bat mitigation measures be aligned to those planned for in Peacocke:</li> <li>Identification of the key bat habitats within and adjacent to the proposed urban areas and an understanding of how bats utilise those habitats.</li> <li>Adopting cross-discipline mechanisms and performance standards in urban design and construction to address direct and indirect effects on bat habitats.</li> <li>Implementation of vegetation removal protocols and strategies to avoid or mitigate adverse effect of the loss of trees for bats.</li> <li>Creation of 'bat buffer zones' adjacent to key habitats, at least 20m wide with a 5m set back from buildings.</li> <li>Performance standards relating to artificial lighting and the design, composition, density and height of vegetation needed to create bat habitats, buffers and corridors.</li> </ul>
<b>Stormwater</b>	<ul style="list-style-type: none"> <li>Te Ture Whaimana is the primary direction setting document of the Waikato. As such, HCC support the inclusion of low impact urban design principles into this plan change which support the health and wellbeing of the Waikato River, its tributaries and catchment.</li> </ul>	<ul style="list-style-type: none"> <li>The health and wellbeing of the Waikato River</li> </ul>	<ul style="list-style-type: none"> <li>Planning provisions which manage the effects of stormwater and wastewater on the Waikato River and give effect to Te Ture Whaimana</li> </ul>



# MAP 1: FUTURE GROWTH AREAS SL1 AND SL2

1:50,000

Appendix 2: SL1 and SL2 Locality







Alternative walking and cycling connections to Faiping Road

Key

Property boundary

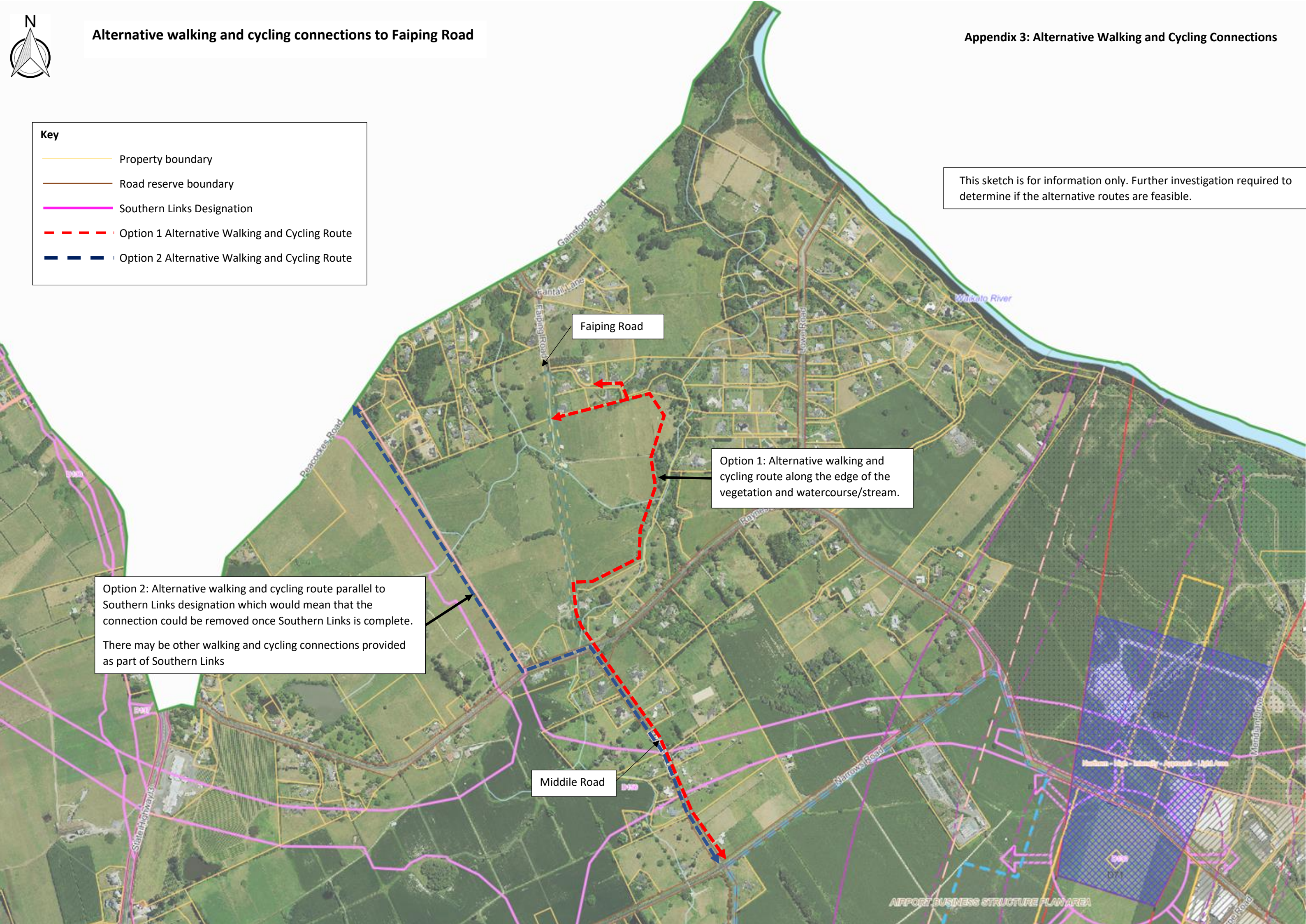
Road reserve boundary

Southern Links Designation

Option 1 Alternative Walking and Cycling Route

Option 2 Alternative Walking and Cycling Route

This sketch is for information only. Further investigation required to determine if the alternative routes are feasible.



Option 2: Alternative walking and cycling route parallel to Southern Links designation which would mean that the connection could be removed once Southern Links is complete.

There may be other walking and cycling connections provided as part of Southern Links

Option 1: Alternative walking and cycling route along the edge of the vegetation and watercourse/stream.

Middle Road

AIRPORT BUSINESS STRUCTURE PLAN AREA






Suggested Future Industrial Area



Appendix 4: Suggested Future Industrial

LEGEND

-  Proposed Southern Links
-  Future Growth Area – Northern Precinct B
-  Airport Northern Precinct