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FONTERRA LIMITED

**PROPOSED PLAN CHANGE 14:  
C10 GROWTH CELL**

Section 32 Evaluation Report

10 May 2024

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## REPORT INFORMATION

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## 1. INTRODUCTION

This Section 32 Evaluation Report has been prepared in support of a private plan change request to the Operative Waipā District Plan (“**District Plan**”) by Fonterra Limited (“**Fonterra**” or “**the Applicant**”).

The purpose of the Proposed Plan Change 14 to the District Plan (referred to as “**Plan Change 14**” or “**PC14**”) is to rezone approximately 79.2 hectares of land at Hautapu from Rural Zone to Industrial Zone (referred to as the “**Mangaone Precinct**” – being the name that has been gifted by Ngāti Hauā and Ngāti Korokī Kahukura). The Mangaone Precinct is within the C10 Industrial Growth Cell (bounded by Swayne Road and Zig Zag Road) earmarking it for future industrial development as shown in **Figure 1** below.

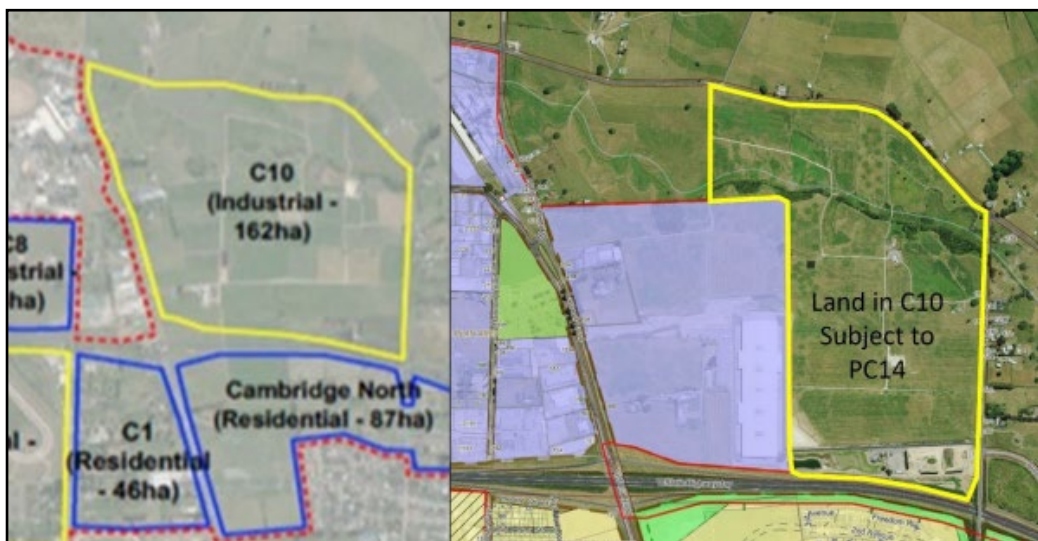


Figure 1: Land subject to Plan Change 14 – Mangaone Precinct

Plan Change 14 is effectively Stage 2 of the of the C10 Industrial Growth Cell being rezoned to Industrial Zone. Stage 1 was the creation of the Bardowie Industrial Precinct located immediately to the west of the Mangaone Precinct (shown in purple on **Figure 1**). It involved rezoning approximately 56 ha of land owned by Bardowie Investments Limited (“**BIL**”) and Shoof Properties Limited (“**Shoof**”) within the C10 Industrial Growth Cell to Industrial Zone by way of Plan Change 11 to the District Plan in 2018.

The majority of the land to be rezoned as part of Plan Change 14 is known as the “Bardowie Farm” (comprising 71.4 ha) owned by Fonterra Limited (“**Fonterra**”) located on the corner of Swayne Road and Zig Zag Road. It is one of several farms owned by Fonterra used for the spray irrigation of wastewater as part of the operation of the Hautapu Dairy Factory located at Hautapu approximately 4km north of Cambridge. The southern portion of the area proposed to be rezoned Industrial is an area of land known as the “Kiwifruit Block” (comprising 7.8 ha) owned by BIL that adjoins the Waikato Expressway and has now been largely developed and/or consented for industrial purposes (i.e. for stormwater management purposes and a maintenance facility) in conjunction with existing

and proposed activities within the Bardowie Industrial Precinct which adjoins the Kiwifruit Block to the west (**Figure 2**). For that reason, the various technical reports supporting Plan Change 14 relate to the undeveloped / unconsented part of the Mangaone Precinct (i.e. the Bardowie Farm).



**Figure 2: Bardowie Farm and Kiwifruit Block**

### **Plan Change 14 Summary**

In summary, Plan Change 14 proposes to make changes to the following sections of the Waipā District Plan:

- Planning Maps
- Definitions
- Section 7 - Industrial Zone
- Section 15 - Infrastructure, Hazards, Development and Subdivision
- Section 16 - Transportation
- Section 21 - Assessment Criteria and Information Requirements
- New Appendix S27 – Mangaone Precinct Structure Plan
- Appendix S20 – Bardowie Industrial Precinct Structure Plan and Urban Design Guidelines



## Structure Plan and Design Principles and Guidelines

In addition to rezoning the land to Industrial Zone, Plan Change 14 proposes to introduce a Structure Plan into the District Plan to guide the future development of the Mangaone Precinct Structure Plan Area (i.e. the “**Bardowie Farm**”). It is proposed that the Kiwifruit Block will be incorporated into the Bardowie Industrial Precinct on the basis that the activities already developed and/or consented on the Kiwifruit Block are related to activities in the Bardowie Industrial Precinct. The Mangaone Precinct Structure Plan relating to the Bardowie Farm is presented as follows (**Figure 3**).

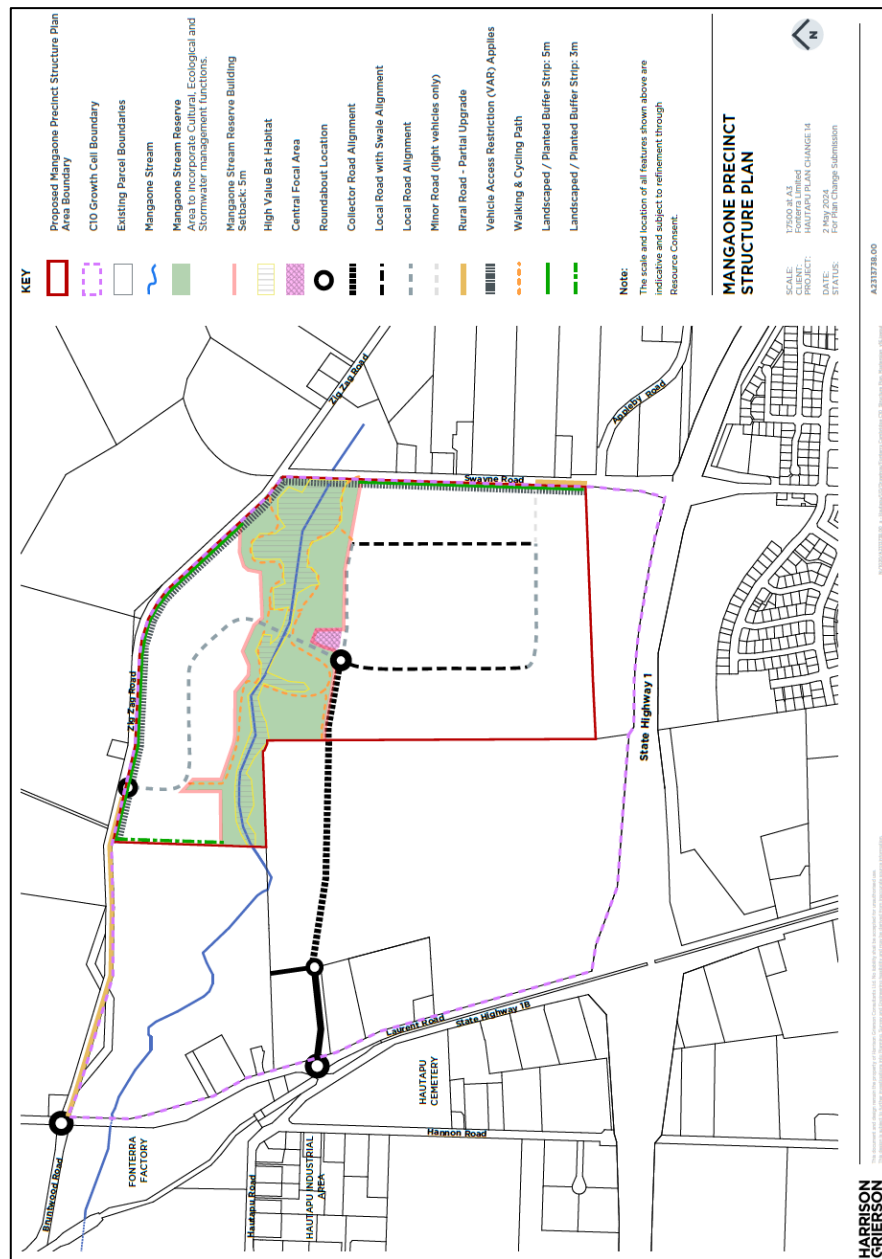


Figure 3: Mangaone Precinct Structure Plan



The key elements of the Structure Plan are:

- Protection and enhancement of the Mangaone Stream and associated wetlands and ecology (including bats) with the potential for a network of pedestrian and cycle paths to be provided;
- The identification of a Collector Road, and Local Roads, as well as points of connectivity to the wider roading network;
- Stormwater detention and management devices (precise locations to be confirmed at the subdivision consenting phase);
- A Central Focal Area that will provide for small-scale retail and service activities to establish that will service the day-to-day needs of the industrial businesses in the area; and
- Proposed landscaping treatments at the site edges (particularly along the Mangaone Stream, Swayne Road and Zig Zag Road).

### **Key Issues**

The two key issues which have been the focus of significant attention as part of the preparation of Plan Change 14 are the management of the Mangaone Stream environment and the interface with the rural-residential properties on the opposite side of Swayne Road and Zig Zag Road.

In relation to the Mangaone Stream environment, Plan Change 14 proposes to create a substantial reserve area comprising approximately 16 ha of land (shaded green on the Structure Plan on **Figure 3**) which will be vested in Council. As a result of consultation with Ngāti Hauā and Ngāti Korokī Kahukura, it is proposed that the reserve area be called the “Mangaone Stream Reserve”. Key features of the Mangaone Stream Reserve are:

- It encompasses a significant riparian margin on both sides of the Mangaone Stream including natural inland wetlands;
- Stormwater ponds within the Mangaone Stream Reserve will be designed to integrate with the existing environment including potentially enhancing the wetland areas;
- It identifies, protects and enhances a High Value Bat Habitat Area within the Mangaone Stream Reserve (including additional planting and controls on lighting);
- There is provision for only one road to cross the Mangaone Stream Reserve linking the northern and southern parts of the Mangaone Precinct;
- There is provision for pedestrian and cycle paths throughout the Mangaone Stream Reserve;
- The amenity of the area will be able to be enjoyed as the northern outlook from the Central Focal Area (within which it is expected that a café and other supporting activities will locate).



In relation to the interface with the rural-residential properties on the opposite side of Swayne Road and Zig Zag Road, Plan Change 14 includes the following features and controls:

- A 5m wide planted landscape strip along Swayne Road and Zig Zag Road;
- A 10m setback for buildings along Swayne Road and Zig Zag Road;
- A rule to control the height of buildings in relation to Swayne Road and Zig Zag Road so that any part of a building able to be up to the maximum height of 20m would need to be positioned well back from the boundary along Swayne Road and Zig Zag Road;
- A rule requiring that there be no signage on the façade of buildings facing Swayne Road or Zig Zag Road;
- A rule requiring that, apart from one point of roading access onto each of Swayne Road and Zig Zag Road in accordance with the Mangaone Precinct Structure Plan, there shall be no direct access to industrial lots within the Mangaone Precinct Structure Plan Area directly from Swayne Road or Zig Zag Road; and
- A limitation on only light vehicles using Swayne Road to access the Mangaone Precinct.

#### **Consequential Amendments to Bardowie Industrial Precinct Structure Plan**

Three consequential changes are required to the Structure Plan relating to the Bardowie Industrial Precinct as follows:

- The Kiwifruit Block is proposed to form part of the Bardowie Industrial Precinct Area (identified as part of Node 1A) and be subject to the Bardowie Industrial Precinct Structure Plan and Urban Design and Landscape Guidelines contained in Appendix S20 of the District Plan;
- A change is required to reflect the updated position proposed in relation to the alignment of the roading connection (a proposed Collector Road) between Victoria Road and the Mangaone Precinct Structure Plan Area; and
- A pedestrian and cycle link is proposed along the eastern edge of Node 1B.

These changes are shown on **Figure 4** below. This forms part of Plan Change 14.







## Regulatory Requirements

The request to advance Plan Change 14 has been made in accordance with the requirements of Sections 32, 74 and 75, and Schedule 1 of the RMA. The assessment has:

- Demonstrated that the objectives of Plan Change 14 are the most appropriate way to give effect to the purpose of the RMA and the proposed provisions are the most appropriate way to achieve the objectives;
- Demonstrated that Plan Change 14 will have positive environmental, social and economic effects and that any potential adverse effects can be managed through the amended District Plan provisions and subsequent resource consent applications; and
- Found that the request will give effect to the relevant National Policy Statements and the Waikato Regional Policy Statement.

Section 32(1) of the RMA requires an evaluation report for PC14 to:

- Contain detail that corresponds to the scale and significance of the anticipated effects of the implementation of the proposal;
- Examine whether the objectives of the proposed plan change are the "most appropriate" way to achieve the purpose of the RMA; and
- Examine whether the proposed provisions are the "most appropriate" way of achieving the plan change objectives, having regard to efficiency and effectiveness and other reasonably practicable options for achieving the objectives.

Examining whether the proposed provisions are the "most appropriate" way of achieving the plan change objectives requires:

- Identification and assessment of the benefits and costs of the effects anticipated from the implementation of the provisions, including opportunities for economic growth and employment;
- If practicable, quantification of the benefits and costs referred to directly above; and
- Assessment of the risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the provisions.

The following sections of this report provide an evaluation prescribed by section 32 of the RMA as follows:

- Section 2 describes the objectives of Plan Change 14 and assesses the appropriateness of the proposal to achieve the purpose of the RMA.
- Section 3 assesses the appropriateness of the proposed provision to achieve the objectives of Plan Change 14. It does this by identifying reasonably practicable alternatives to achieve the objectives and then assessing the efficiency, effectiveness, costs, and benefits of the preferred option. This section also includes an assessment of the risks of not acting and the reasons for deciding on the provisions.



For completeness, it is noted that this assessment is undertaken at a scale corresponding to the scale and significance of the environmental, economic, social, and cultural effects that are anticipated from the implementation of Plan Change 14.

Further details of Plan Change 14 are included in the plan change application and supporting reports, which should be read alongside this evaluation report.



## 2. APPROPRIATENESS OF THE OBJECTIVES

### 2.1 OVERALL OBJECTIVE OF PLAN CHANGE 14

The overall objective of Plan Change 14 is to enable the industrial development of the C10 Industrial Growth Cell to be brought forward so that it adds to the availability of industrial land ready for development in the Cambridge area in the medium term, while ensuring that the effects of industrial development can be appropriately managed.

The C10 Industrial Growth Cell is an area that has been earmarked for industrial development for many years and the District Plan identifies it as being suitable for industrial development 'beyond 2035'. However, the Economics Assessment (refer to Appendix I of the plan change application) highlights that the Future Proof Business Development Capacity Assessment 2021 ("BDCA") is likely to have underestimated the shortfall of vacant industrial land within the Cambridge-Karapiro area by 2050. There is also an ongoing shortage of industrial land being available to the market in the Cambridge / Hautapu area (as distinct from merely being "plan enabled").

This also impacts the ability for the Waipā District Council ("District Council") to give effect to the National Policy Statement on Urban Development 2020 ("NPS-UD"), which requires the District Council to provide an oversupply of business land in the medium to long term. There is not enough land zoned and available to market to meet anticipated demand.

The District Council has, for some years, been encouraging Fonterra to allow the Bardowie Farm to be developed for industrial purposes in line with the District Council's identification of the land as a future industrial area and statutory obligations.

### 2.2 PROPOSED CHANGES TO DISTRICT PLAN OBJECTIVES

The proposal retains the following relevant objectives of the Industrial Zone without change.

*7.3.1 The Industrial Zone is developed in a manner that:*

- a. Avoids a reduction in industrial land supply by the establishment of non-industrial activities; and*
- b. Protects industrial activities from incompatible land uses that could result in reverse sensitivity effects; and*
- c. Protects the ability for the Hautapu and Te Awamutu Dairy Manufacturing Sites to continue to operate and expand within their respective sites.*

*7.3.2 To maintain a level of amenity along road boundaries within the Industrial Zone.*

*7.3.3 To manage actual or potential adverse effects on people, buildings, and activities beyond the Industrial Zone.*

*7.3.7 To enable signs which relate to the activities carried out on the site and which do not create adverse effects through either location or design.*

*7.3.8 To ensure that earthworks are carried out in a manner that avoids adverse effects between properties and on water bodies.*



Plan Change 14 proposes to make minor amendments to Objective 7.3.4 of the District Plan to include reference to the Mangaone Precinct Structure Plan Area. This objective relates to the manner in which the Hautapu Industrial Structure Plan Area and the Bardowie Industrial Precinct Structure Plan Area should be developed. Changes are presented in **blue text** - new text underlined and deleted text ~~struck through~~.

***“Objective - Hautapu Industrial Structure Plan Area, ~~and the Bardowie Industrial Precinct Structure Plan Area~~ and Mangaone Precinct Structure Plan Area***

7.3.4 *Development of the Hautapu Industrial Structure Plan Area, ~~and the Bardowie Industrial Precinct Structure Plan Area~~ and the Mangaone Precinct Structure Plan Area occurs in a manner that:*

- a. *Is visually attractive and has landscaping that reflects Cambridge’s character; and*
- b. *Enables within the Hautapu Industrial Structure Plan Area and the Mangaone Precinct Structure Plan Area the development of a central focal area with a reserve and retail activities and commercial services that principally meet the needs of workers; and*
- c. *Avoids or mitigates any actual or potential adverse effects on surrounding rural properties and public spaces, including the Hautapu Cemetery; and*
- d. *Is co-ordinated with infrastructure provision; and*
- e. *Contributes to the development of a ‘gateway’ to Cambridge; and*
- f. *Is aligned with the land allocation table for industrial land within Hautapu and/or the criteria for alternative land release both as outlined within the Regional Policy Statement; and*
- g. *Enables within the Bardowie Industrial Precinct the development of a Campus Hub that avoids or mitigates any actual or potential adverse effects on the commercial hierarchy of the Cambridge Central Business District. and;*
- h. *Within the Mangaone Precinct Structure Plan Area, enables industrial development whilst protecting and enhancing the ecological values of the Mangaone Stream and natural wetlands.*

No new objectives are proposed to be inserted into the District Plan.

## **2.3 ASSESSMENT OF THE OBJECTIVES AGAINST PART 2 OF THE ACT**

The purpose of the RMA is to promote the sustainable management of natural and physical resources.

Existing objectives of the District Plan have been subject to a Schedule 1 process under the RMA and their appropriateness in achieving the purpose of the RMA are not challenged by Plan Change 14. It is noted that their retention will ensure industrial development within the Mangaone Precinct will align with the development of other industrial land in the broader Hautapu area.

The proposed amendments to Objective 7.3.4 are the most appropriate way to achieve the purpose of the RMA because:



- It will enable the efficient use and development of a scarce land resource.
- It will enable people and communities to provide for their economic well-being by releasing industrial land for development and employment creation, for which there is a demonstrated and proven demand.
- The proposal supports the retirement of the land from rural activities, including the spraying of wastewater from the Hautapu Dairy Factory, and enables more efficient use of the land area and contributes to improving the quality of downstream water bodies through reduced nutrient loading and soil erosion (that would be associated with horticultural or agricultural activities).
- Parts of the site contain significant ecological values, including potential habitat for long-tailed bats and areas meeting the National Policy Statement for Indigenous Biodiversity (“**NPS-IB**”) criteria for significant indigenous vegetation and the National Policy Statement for Freshwater Management (“**NPS-FM**”) criteria for natural inland wetlands. The proposed Structure Plan has been iteratively designed to ensure potential adverse effects of the development of the area are managed with respect to s6(a) and (c).
- The site is a highly modified rural environment and there are no outstanding natural features or landscapes present. Planted buffers are proposed for riparian margins of Mangaone Stream and natural inland wetlands to ensure the natural character of these features is preserved and enhanced (s6(a) and (b)).
- The proposed Mangaone Precinct Structure Plan includes the establishment of the Mangaone Stream Reserve which including the provision of public cycling and pedestrian access along the Mangaone Stream (s6(d)).
- With regard to s6(e) and (g), particular regard has been given to relevant iwi management plans and the Mangaone Precinct Structure Plan has been iteratively designed to ensure the mauri of Mangaone Stream and the Waikato River is maintained and enhanced.
- Potential areas of archaeology have been identified and recommendations adopted to ensure development in proximity to these areas is managed with respect to s6(f).
- The site is not subject to significant risk from natural hazards, and flooding management and geotechnical advice has been obtained and adopted with respect to s6(h).
- There are no unmanageable hazards identified on the site that could preclude the proposed rezoning accommodating future industrial growth in respect of s6(h).
- In terms of s7(aa), (d), (f), and (h) the proposal has particular regard to protection of the natural environment, noting proposed protection and enhancement to areas of indigenous vegetation and natural inland wetlands, and that appropriate stormwater management will be incorporated into the future development of the site.



- The proposal will enable the efficient use and development of the land (s7(b)), noting the site has been earmarked for industrial development for some years, connects to existing industrial land and regional transport corridors, and meets demand for industrial land. In this regard, it is also noted that the NPS-UD identifies Waipā District as a high-growth urban area and a Tier 1 urban environment.
- While amenity values associated with the site will undoubtedly change, permitted conditions, performance standards, assessment criteria, and the Structure Plan have been developed to ensure particular regard will be had to the maintenance and enhancement of amenity values (s7(c)).
- With regard to s7(i), the proposal promotes active transport methods through the incorporation of cycle ways. The Structure Plan promotes resilience to current and future effects of climate change through consideration of flood risk and stormwater management.
- With regard to s8, the proposal has responded to feedback provided by mana whenua and mātauranga shared during site visits, and incorporates recommendations provided through the Cultural Impact Assessment (Appendix M of the PC14 application document).

It is considered the plan change objective is the most appropriate way to achieve the purposes of the RMA through providing additional industrial development capacity in the Waipā District.



### 3. APPROPRIATENESS OF THE PROVISIONS

Sections 32(1)(b), (2) and (3) set out the matters that must be considered when assessing the appropriateness of the provisions in achieving the objectives, including:

- Identifying and assessing other reasonably practicable options;
- Identifying and assessing the benefits and costs of new provisions, including opportunities for economic growth and employment;
- Assessing the risks of acting or not acting if there is uncertain or insufficient information;
- Assessing the efficiency and effectiveness of proposed provisions; and
- Summarising the reasons for deciding on the proposed provisions.

The objectives of the District Plan are given effect to through the following proposed changes:

- Amend all relevant planning maps to show the rezoning of the site from Rural Zone to Industrial Zone and to extend the Cambridge Urban Limits Boundary to encompass the site;
- Insert two new definitions for the terms 'Innovation and Advanced Technology Activities' and 'Gymnasium' to Part B – Definitions;
- Amend existing and insert new issue statements, policies, rules and performance standards in Section 7 – Industrial Zone to refer to and provide for industrial development in the Mangaone Precinct Structure Plan Area and to ensure development of the site is undertaken in accordance with the Structure Plan and results in high quality urban design;
- Amend Rule 15.5.2.69 and insert new rules into Section 15 - Infrastructure, Hazards, Development and Subdivision to include references to the Mangaone Precinct Structure Plan Area (Appendix S27) and control subdivision within the Mangaone Precinct Structure Plan Area;
- Amend Rule 16.4.2.12 and insert a new rule in Section 16 – Transportation to control vehicle access to the Mangaone Precinct Structure Plan Area;
- Include additional assessment criteria in Section 21 – Assessment Criteria and Information Requirements to ensure development of the site is undertaken in accordance with the Mangaone Precinct Structure Plan and results in high quality urban design;
- Insert new Appendix S27 to incorporate the Mangaone Precinct Structure Plan into the District Plan; and
- Make a consequential amendment to Appendix 20 – Bardowie Industrial Precinct Structure Plan and Design Guidelines to include the Kiwifruit Block as part of the Bardowie Industrial Precinct and show a new proposed position and alignment of the





roading connection (a proposed Collector Road) between Victoria Road and the Mangaone Precinct Structure Plan Area.

The proposed changes are set out in full in Section 4 of the Mangaone Precinct application document.

Section 32(2)(b) also requires an assessment of the risk of acting or not acting if there is uncertain or insufficient information. In this case, there is considered to be sufficient information to determine the range and nature of effects of the options set out, and so that assessment has not been undertaken.

### **3.1 OPTIONS IDENTIFICATION AND EVALUATION**

Section 32(1)(b)(i) of the RMA, requires this report to identify “other reasonably practicable options” to promote sustainable management, including retaining the status quo, non-regulatory methods, and plan changes.

We have identified four reasonably practicable options that could have been utilised to achieve the objectives of the District Plan.

**Option 1:** Maintaining the status quo.

**Option 2:** Waiting for the next review of the District Plan and making submissions to seek the rezoning.

**Option 3:** Rezoning the land via a private plan change (preferred option).

**Option 4:** Establishing industrial activities on an alternative site.

Each option is discussed in the sections below.

#### **3.1.1 Option 1: Maintain the Status Quo**

This option involves retaining the existing Rural Zone and District Plan provisions and progressing industrial development at Bardowie Farm via resource consents. The Kiwifruit Block, which is already developed and/or consented for industrial purposes, would also remain zoned Rural Zone.

The development would trigger the need for resource consents under the following key rule:

- Rule 4.4.1.5 (b): All other activities not listed in activity status table Rules 4.4.1.1 to 4.4.1.4 and not listed as a prohibited activity – non-complying activity.

As a non-complying activity, any resource consent application would need to pass one of the two section 104D gateway tests; that the adverse effects on the environment will be minor or that the activity will not be contrary to the objectives and policies of relevant plans or proposed plans. Demonstrating either of these tests has been met could be challenging. The cumulative effect of rezoning almost 80 ha of land from rural to industrial



land has the potential to give rise to adverse effects that are considered to be more than minor (in a rural context), and the relevant plan provisions are focused on maintaining rural character and amenity. Non-farming activities are limited to those that have a functional or compelling reason to establish in the area and do not result in the loss of rural primary production land (for example, Objectives 4.3.7 and 4.3.12).

As such, it is anticipated that piecemeal and sporadic industrial development would occur as developers or industrial businesses were motivated to do so. Such an approach would:

- Not meet the expected medium-term demand for industrial land at Cambridge. The District Council would therefore not be able to meet their obligations to provide at least sufficient industrial land over the medium-term as required of Tier 1 urban environments by the NPS-UD.
- Be an inefficient and ineffective method of assessing potential adverse effects. Each individual application would be required to assess the same or similar potential effects and the quality of these assessments may vary between application.
- Result in inconsistent mitigation approaches to managing potential adverse effects at the boundary with rural-residential land uses.
- Produce sub-optimal servicing and connectivity outcomes. The site is currently not serviced with stormwater, public sewer mains, public potable or water supply. There is also a need to ensure sufficient power connectivity. A resource consent approach to industrial development may result in inefficient infrastructure development projects that do not align with the future needs of the industrial business community and are provided at increased cost to the Waipā community.
- Preclude the placemaking opportunity and maintenance of amenity, character and ecological values that exists in applying a consistent Structure Plan approach to urban design to all industrial development in the Mangaone Precinct Structure Plan Area.
- Not achieve the purpose of existing objectives of the District Plan which are relevant to Plan Change 14 and will remain when Plan Change 14 takes effect.

It is also noted that the status quo would maintain a consenting burden for non-complying industrial activities in the Rural Zone and does not provide certainty for industrial businesses.

### **3.1.2 Option 2: Rezone through a District Plan Review**

For this option, the applicant could seek to advance the rezoning sought by way of a submission on a wider District Plan review (or change) process. This option would be similar to the private plan change option in that any submission would need to be supported by technical evidence confirming that the land is suitable for the intended land use.

This option would result in the realisation of many of the benefits of a private plan change process due to the integrated and holistic nature of District Plan reviews.



The timeframes for this option, however, are uncertain as it is unclear when the next District Plan review will occur. As the District Plan was made fully operative in 2017, it is unlikely that a full District Plan review will occur in the near future.

This approach would not enable the District Council to meet its obligations to provide at least sufficient industrial land over the medium-term as required by the NPS-UD.

### **3.1.3 Option 3: Rezone through a Private Plan Change**

This option is to re-zone part of the C10 Industrial Growth Cell from Rural Zone to Industrial Zone and to insert a Structure Plan into the District Plan via a private plan change process. This is the preferred option. It involves amending existing District Plan provisions for the Industrial Zone to provide for development in the Mangaone Precinct. This approach would:

- Align with the District Council's clear preference and existing strategies to develop this land for industrial uses;
- Enable land to be developed for industrial activities in the medium-term, supporting the District Council to meet their obligations under the NPS-UD;
- Achieve the purpose of existing objectives of the District Plan which are relevant to Plan Change 14 and will guide subsequent consenting processes when Plan Change 14 takes effect;
- Allow for the consideration of the cumulative effect of potential adverse effects on the environment, including the maintenance and enhancement of Mangaone Stream, natural inland wetlands and bat habitat;
- Provide consistent mitigation and management of potential adverse effects at the boundary with rural-residential land uses along Swayne and Zig Zag Roads through requirements for landscaped setbacks, height in relation to boundary standard which effectively results in a maximum building height of 8.8m for buildings adjacent to the boundary, and traffic movements on Swayne Road limited to light vehicles.
- Establishment of a Central Focal Area (within which it is expected that a café and other supporting activities will locate) to meet the needs of workers;
- Provide for effective, efficient, and integrated transport and infrastructure servicing solutions that meet the future needs of occupants; and
- Ensure amenity and significant ecological effects are maintained and enhanced through the application of the Mangaone Precinct Structure Plan.

### **3.1.4 Option 4: Establish industrial development at an alternative location**

This option would involve establishing an industrial precinct of a comparable scale and form in a different part of the Waipā District.



As noted above, demand for industrial land in the vicinity of Cambridge is increasing at a faster rate than anticipated with industrial land required earlier than originally thought. Much of the land surrounding Cambridge is classified as Highly Productive Land (being LUC classes 1-3), therefore options for undertaking urban development on rurally zoned land are largely restricted to those areas already identified in the Waipā 2050 Growth Strategy.

Other areas identified in Cambridge for short-term industrial development (Growth Cell C8) have already been rezoned to industrial, and Proposed Plan Change 17 has recently rezoned an area of approximately 20ha north of Hautapu Rd from Rural Zone to Industrial Zone. These rezonings better reflect current land use, rationalises the Industrial Zone boundary, and assists in meeting demand for industrial land. Despite these changes, demand for market available land is anticipated to outstrip capacity in the short to medium term.

Alternative sites would therefore need to be located outside the Cambridge area and would not meet the anticipated demand.

Plan Change 14 provides a unique opportunity to liven up industrial land in Cambridge which will be available to the market in the medium term. It is noted that the landowner of the remaining area of Growth Cell C10 declined an invitation to participate in this private plan change process.

Therefore, there are no realistic alternatives for land that is not only plan-enabled, but available to market in the vicinity of Cambridge to meet medium-term demand.

## **3.2 EVALUATION OF PLAN CHANGE PROVISIONS**

The following section assesses the appropriateness of the proposed provisions in accordance with sections 32(1)(b)(ii) and 32(2).

### **3.2.1 Appropriateness of Plan Change 14 Provisions**

As detailed above, Plan Change 14 proposes to make changes to the following sections of the District Plan:

- Planning Maps
- Definitions
- Section 7 - Industrial Zone
- Section 15 - Infrastructure, Hazards, Development and Subdivision
- Section 16 - Transportation
- Section 21 – Assessment Criteria and Information Requirements
- New Appendix S27 – Mangaone Precinct Structure Plan
- Appendix S20 – Bardowie Industrial Precinct Structure Plan and Urban Design Guidelines.



The appropriateness of the proposed provisions to achieve Objective 7.3.4 and the relevant objectives of the District Plan is discussed in the context of the following themes:

- Mangaone Stream, natural inland wetlands and bat habitat;
- Interface with rural-residential neighbours;
- Enablement of a Central Focal Area;
- Transport and access;
- Urban design; and
- Management of activities near transmission lines.

### **Mangaone Stream, Natural Inland Wetlands and Bat Habitat**

Proposed amendments to Objective 7.3.4 require the development of the Mangaone Precinct to occur in a visually attractive manner and proposed clause (h) introduces a requirement for protecting and enhancing the ecological values of the Mangaone Stream and natural wetlands. Objective 7.3.8 (which is not being amended) requires that earthworks are carried out in a manner that avoids adverse effects on water bodies.

Plan Change 14 proposes to create the Mangaone Stream Reserve (shaded green on the Structure Plan in **Figure 3**) which will be vested in Council and provide a high level of amenity while protecting and enhancing ecological and cultural values. Key features of the Mangaone Stream Reserve are:

- It encompasses a significant riparian margin on both sides of the Mangaone Stream including natural inland wetlands and buffers the High Value Bat Habitat;
- Design of the Mangaone Stream Reserve will include District Council and Mana Whenua engagement;
- Stormwater ponds within the Mangaone Stream Reserve will be designed to integrate with the existing environment including potentially enhancing the wetland areas;
- It identifies, protects, and enhances a High Value Bat Habitat Area within the Mangaone Stream Reserve. PC14 proposes to restrict artificial outdoor lighting, retain existing indigenous vegetation and encourage additional planting, and require a building setback of 5m in addition to planted buffer areas along the High Value Bat Habitat;
- There is provision for only one road to cross the Mangaone Stream Reserve linking the northern and southern parts of the Mangaone Precinct;
- There is provision for pedestrian and cycle paths throughout the Mangaone Stream Reserve;
- The amenity of the area will be able to be enjoyed as the northern outlook from the Central Focal Area (within which it is expected that a café and other supporting activities will be located).



Appendix D to the main application sets out the various recommendations for protecting, maintaining, and enhancing the High Values Bat Habitat. The Applicant has adopted these recommendations in full.

Doing nothing is not considered a reasonably practicable alternative, as it would not provide for the protection and enhancement of Mangaone Stream and natural wetlands. The Applicant recognises the necessity of taking a precautionary approach to protect bat habitat at the site,<sup>1</sup> despite the limited activity recorded.

Alternatives, such as a smaller or unvegetated setbacks from Mangaone Stream and natural wetlands, are not considered to provide sufficient protection or enable the enhancement of ecological values associated with these features.

Additional controls, such as controlling lighting on industrial sites that may shine towards the Mangaone Reserve, is not required because there is already a planted buffer area around the high value bat habitat. It is also considered that the combination of proposed provisions, when implemented, will result in additional building setbacks from the Mangaone Reserve.

### **Interface with Rural-Residential Neighbours**

Objective 7.3.4 requires the avoidance or mitigation of actual or potential adverse effects on surrounding rural properties and public spaces and development to occur in a visually attractive manner with landscaping that reflects Cambridge's character. Plan Change 14 includes the following features and controls in relation to the interface with the rural-residential properties on the opposite side of Swayne Road and Zig Zag Road:

- A 5m deep landscaped buffer strip and a timber post and rail fence, which complements the Cambridge rural aesthetic, along Swayne Road and Zig Zag Road;
- The landscaped buffer strip along any boundary with Swayne Road and Zig Zag Road is to include a hedge with a minimum height of 2m at maturity and a row of trees, spaced at 10m apart or less, with a minimum height of 12m at maturity;
- Security fencing is to be a maximum height of 3m and located within sites, inside the planted buffer strip;
- A 3m deep landscaped buffer strip, which includes a hedge with a minimum height of 2m at maturity along the interface with the Rural Zone within the C10 Industrial Growth Cell;
- A 3m deep landscaped amenity strip, which includes specimen trees planted at regular spacings of 20m or less and groundcover planting or shrubs, along the frontage of any lots adjoining an internal road within the Mangaone Precinct Structure Plan Area (except where site accessways are formed);

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<sup>1</sup> As established by the objective (clause 2.1) and precautionary approach (clause 3.7) of the National Policy Statement for Indigenous Biodiversity 2023.



- The Zig Zag Road and Rural Zone interface are to be landscaped at the time of the first subdivision and/or development of the land within the Mangaone Precinct to the north of the Mangaone Stream;
- The Swayne Road interface is to be landscaped at the time of the first subdivision and/or development of the land within the Mangaone Precinct to the south of the Mangaone Stream;
- A 10m setback for buildings along Swayne Road and Zig Zag Road;
- Where a site adjoins Swayne Road or Zig Zag Road no building or stored materials shall penetrate through a recession plane at right angles to the road boundary inclined inwards and upwards at an angle of 30° from 3m above ground level at the road boundary (this means that the maximum height of a building 10m from the boundary would be 8.8m);
- A rule requiring that there be no signage on the façade of buildings facing Swayne Road or Zig Zag Road; and
- A limitation on only light vehicles using Swayne Road to access the Mangaone Precinct.

The key purpose of these provisions is to maintain the rural character and amenity in accordance with the recommendations of the Urban Design Statement attached to the main PC14 application document as Appendix N.

It is considered a planted buffer strip with a depth of 2.5m or less would not provide sufficient, sustainable screening of industrial activities, and therefore a 5m deep landscape buffer strip is considered the most appropriate way to ensure adverse effects at the interface are mitigated over the long-term. Proposed controls on fencing will ensure that the rural character of Cambridge is retained and provide an attractive streetscape.

Alternatives to the proposed implementation programme have been considered, including requiring landscaping to occur on a site-by-site basis. This approach would result in patchy, piecemeal landscaping and would not maximise the opportunity for vegetation to establish and provide mitigation benefits as the site is developed.

Shorter setbacks and less acute recession planes were considered inappropriate as they may result in buildings and industrial activities being located close to the boundary and would not provide sufficient mitigation for the amenity of rural residents along Zig Zag and Swayne Road.

#### **Enablement of a Central Focal Area**

Objective 7.3.4 requires the development of the Mangaone Precinct to occur in a manner which enables the development of a Central Focal Area with small scale retail activities and commercial services that principally meet the needs of workers. In addition, Objective 7.3.1 requires that Industrial Zone development avoids the reduction of industrial land



supply due to the establishment of non-industrial activities and protects industrial activities from incompatible land uses.

Giving effect to both these objectives requires careful consideration of the nature and scale of non-industrial activities that should be provided for in the Industrial Zone.

Plan Change 14 provides for a Central Focal Area by:

- Providing for non-industrial services, such as food providers, gyms, carparking and public amenities, that are primarily focussed on servicing the needs of workers in the Industrial Zone;
- Not providing for takeaway outlets with drive through facilities;
- Identifying a specific location where these activities shall be located in the Structure Plan (i.e. the Central Focal Area); and
- Requiring other non-industrial activities to avoid adverse effects on the transport network, High Value Bat Habitat, and the vitality, function, and amenity of other retail centres in the district.

The proposed activities are considered to support a well-functioning environment, in that they provide for the needs of workers in the area but are unlikely to draw business away from established commercial zones.

The Applicant considered including proposed ground floor areas in the rule to ensure the non-industrial activities remain at a scale appropriate to the Industrial Zone. Given that non-industrial activities are limited to a specified list of activities and must occur within the Central Focal Area, which is limited to an area of 4,000m<sup>2</sup> at the location specified on the Mangaone Precinct Structure Plan Area, it is considered the risk of any non-industrial activities occurring on an inappropriate scale is low and it is not efficient to specify ground floor areas for each non-industrial activity.

A consent pathway is available for other non-industrial uses that may be appropriate in the Industrial Zone. These uses will need to display consistency with the purpose of the Central Focal Area by demonstrating that they will only service the day-to-day needs of the local workforce, and will avoid adverse effects on the vitality, function and amenity of other retail centres and the transport system. This is considered to provide an appropriate balance between providing for the needs of workers and avoiding adverse effects from non-industrial development within the Industrial Zone.

### **Transport and Access**

Objective 7.3.4 requires industrial development to occur in a manner which is coordinated with infrastructure provision and avoids or mitigates adverse effects on surrounding rural properties. It is noted that the Integrated Transport Assessment (Appendix H to the main PC14 application document) includes a comprehensive assessment of the proposed roading and access for the Mangaone Precinct against the objectives and policies of the District Plan.





Most notably, the Mangaone Precinct Structure Plan supports good transport and access outcomes by:

- Connecting to the existing roading network at three points producing an effective local transport network distribution;
- Appropriately connecting to the existing roading network hierarchy, primarily via a new Collector Road from Victoria Road;
- Connecting to existing and planned walking and cycling networks;
- Providing a clear roading hierarchy within the Mangaone Precinct; and
- Restricting use of Swayne Road to light vehicles only.

The option of enabling heavy vehicles or multiple access points from Swayne Road or Zig Zag Road would not respond to concerns regarding the rural-residential interface. Likewise, the provision of multiple roads crossing the proposed Mangaone Stream Reserve would not protect or enable the enhancement of the ecological and cultural values associated with the Mangaone Stream, natural inland wetlands and High Value Bat Habitat.

Plan Change 14 does not propose changes to Section 16 – Transportation of the District Plan. These provisions have been subject to a Schedule 1 process under the RMA and their appropriateness in achieving the purpose of the RMA are not challenged by Plan Change 14. Rather, it is considered effective and efficient to ensure that future activities within the Mangaone Precinct are subject to provisions which are consistent across the District.

### **Urban Design**

Objectives 7.3.2 relates to maintaining amenity along road boundaries with the Industrial Zone and Objective 7.3.3 requires the management of actual and potential adverse effects on people, buildings and activities beyond the Industrial Zone. Objective 7.3.7 enables signs which relate to the activities carried out on site and do not create adverse effects through location or design. Objective 7.3.4 sets out the manner in which the development of the Mangaone Structure Plan Area must occur.

The Applicant has prepared an Urban Design Statement to inform the development of the Plan Change 14. This assessment is attached to the main PC14 application document as Appendix N. The recommended design responses clearly establish the expectations for development of the Mangaone Precinct as a high-quality, contemporary industrial precinct. They consider more than just the visual components of the development, but promote development which respects the cultural, ecological, and freshwater values of the Mangaone Stream and its margins, as well as the rural amenities of the surrounding area to the north and east.



High quality industrial urban design is achieved through Plan Change 14 by:

- The introduction of rules and performance standards which specify expected design outcomes for permitted activities, including:
  - the colour scheme to be utilised;
  - signage requirements specific to the Mangaone Precinct Structure Plan Area; and
  - landscape buffer strip planting requirements.
- The introduction of new Rule 15.4.2.91A which, among other matters, requires:
  - establishment works for landscaping and the Mangaone Reserve and the vesting of the Mangaone Stream Reserve with the District Council as part of the first subdivision consent;
  - assessment of effects on the heritage values of Swayne House for any subdivision or development within 50m of Swayne House; and
  - provision of a list of matters that will be the subject of private covenants.
- Assessment criteria are added to Schedule 21 which reflect the expectations of the design principles.

The Applicant has considered the manner in which the recommended design responses should be incorporated into Plan Change 14. The approach which seems to be common in private plan changes to the District Plan to date is to require new development to occur “in general accordance” with a set of Design Guidelines attached to the District Plan alongside a Structure Plan. This approach is considered *ultra vires* for determining permitted activity status of proposed activities as it does not provide sufficient certainty for the purposes of a rule.

The Design Guidelines developed as part of the Urban Design Statement have instead been adopted within the various planning provisions where appropriate (e.g. as permitted activity performance standards) or will otherwise be the subject of private covenants (where a higher standard of outcome is desired beyond what is necessary for the District Plan to meet the requirements of the RMA). This approach is considered to provide greater certainty for assessing compliance with permitted activity rules and will result in more consistent high-amenity outcomes.

Other matters which may contribute to high amenity outcomes, such as the control of dust, is managed by the Waikato Regional Plan and is outside the scope of this plan change.

### **Management of Activities near Transmission Lines**

Objective 7.3.4 requires development of the Mangaone Structure Plan Area to occur in a manner which is coordinated with the infrastructure provisions. As noted in the main PC14 application document, the northern part of the site is traversed by 110 kV transmission lines owned and operated by Transpower NZ Limited. A set of 33 kV power lines traverse



the site diagonally which are owned and operated by Waipa Networks Limited. These lines are not subject to a designation in the District Plan.

The site is currently zoned Rural Zone under the District Plan, which includes a set of rules managing activities within the vicinity of the National Grid Yard. These rules relate only to the 110kV transmission lines to the north. There are no rules managing activities within the National Grid Yard in the Industrial Zone because there are currently no high voltage lines in any area of land zoned Industrial Zone.

Plan Change 14 proposes to carry over the existing Rural Zone rules into the Industrial Zone, through the introduction of new Rule 7.4.2.43. As the Mangaone Precinct Structure Plan Area would be the only Industrial Zoned land traversed by high-voltage transmission lines, the practical implication of this amendment is that new Rule 7.4.2.43 will only apply to the Mangaone Precinct Structure Plan Area.

It is considered that the existing Rural Zone rules applying to these transmission lines have been tested by a Section 32 assessment when originally introduced into the District Plan and found appropriate. The Applicant considers there is no reason that the same conclusion could not be reached in relation to new Rule 7.4.2.43 relating to the Industrial Zone.

It is also noted that the Applicant has approached Transpower with a view to seeking their confirmation they agree this is an acceptable outcome.



### 3.2.2 Cost Benefits Analysis

The following table provides an assessment of the costs and benefits of the environmental, economic, social and cultural effects (including economic growth and employment) that are anticipated from the implementation of the provisions as required under sections 32(2)(a) and (b) of the RMA.

**Table 1: Cost Benefits Analysis**

	Benefits	Costs
<b>Environmental</b>	<p>The key environmental benefits of the proposed plan change include:</p> <ul style="list-style-type: none"> <li>➤ The restoration and protection of the water quality in the Mangone Stream through the reduction in diffuse discharges from farming activities and the introduction of planted buffers from the stream and natural inland wetlands;</li> <li>➤ Introduction of stormwater treatment to improve the quality of water entering receiving waters;</li> <li>➤ Mitigation of potential reverse sensitivity issues associated with the strategic location adjacent to existing industrial precincts;</li> <li>➤ Ecological benefits in respect of maintaining and enhancing riparian planting of the streams within the site;</li> <li>➤ Ecological benefits related to the protection and enhancement of a High Value Bat Habitat Area within the Mangaone Stream Reserve (in addition to lighting controls);</li> <li>➤ Ecological benefits in restoring and enhancing the existing natural wetlands (including the establishment of additional wetland areas) within the plan change area;</li> <li>➤ Opportunity for placemaking and establishment of high urban amenity through implementation of performance standards, the Mangaone Precinct Structure Plan, and development of a Central Focal Area;</li> </ul>	<p>The proposal results in the loss of productive soils, although it is noted that the land has been earmarked for several years to be developed for industrial activities and the Kiwifruit Block is already developed and/or subject to consents enabling industrial activities.</p> <p>Amenity and character of the area will change from rural to urban, although it is noted that this does not necessarily equate to an adverse effect.</p> <p>The development of the growth cell, if undertaken in an inappropriate manner, could adversely affect the water quality of receiving waterbodies and ecological values. However, these effects can be managed (avoided and mitigated) through being developed in accordance with the proposed Structure Plan, the design and layout of the future subdivision (subject of a separate consent process) and compliance with the relevant standards already included in the District Plan.</p>



	Benefits	Costs
	<ul style="list-style-type: none"> <li>➤ Improved resilience to the effects of climate change through consideration of flood risk and stormwater management; and</li> <li>➤ Opportunities for reductions in greenhouse gas emissions associated with provision of options for active modes.</li> </ul> <p>In addition, the structure plan has been developed to integrate with the existing industrial activities on the western boundary.</p>	
<p><b>Economic</b> (including opportunities for economic growth and employment to be provided or reduced)</p>	<p>The economic benefits of the proposed plan change include:</p> <ul style="list-style-type: none"> <li>➤ Provision of land to satisfy demand for industrial location in Hautapu;</li> <li>➤ Enablement of economies of scale and industrial agglomeration effects associated with the strategic location of the Mangaone Precinct adjacent to existing industrial precincts;</li> <li>➤ Improved land use efficiency associated with the strategic location of the Mangaone Precinct adjacent to existing industrial precincts;</li> <li>➤ Increased industrial employment and economic profile associated with industrial growth and the location of industrial activities that may not have otherwise considered Cambridge;</li> <li>➤ Additional employment opportunities during construction activities;</li> <li>➤ Reduction in marginal cost of infrastructure provision;</li> <li>➤ Ability to comprehensively develop the Structure Plan area to provide different lot sizes, to assist with affordability; and</li> <li>➤ The plan change has been prepared at Fonterra’s cost whereby those costs are not carried by the rate payer. In addition, the infrastructure required to develop the growth cell will likely be funded through development contributions (again, to reduce economic effects on the rate payer).</li> </ul>	<p>There is an opportunity cost associated with the loss of rural production land. However, it is noted that the C10 Industrial Growth Cell has been identified for industrial development for some years.</p> <p>Additional infrastructure investment and servicing requirements. It is noted that the plan change process is funded by the applicant, and it is anticipated that infrastructure will be funded through development contributions, such that there are limited costs to the general rate payer.</p> <p>Potential to undermine existing vacant land capacity. This effect is expected to be minimal and temporal since no actual industrial development is expected to take place until 2028 at the earliest.</p> <p>Reverse sensitivity effects could arise as a result of the plan change, which could have economic costs if land uses were constrained or curtailed. However, the location of the site being adjacent to existing industrial areas, layout of the structure plan, and compliance with existing rules in the District Plan, will manage and minimise the potential for reverse sensitivity.</p>

	Benefits	Costs
<b>Social</b>	<p>There is a significant social benefit of providing additional industrial land within the Waipā District, as well as providing lots at different scales (i.e. including smaller lots) which assist with affordability. There are also social benefits through job creation and employment opportunities, including during construction activities.</p> <p>The development of Mangaone Stream Reserve on the edges of the Mangaone Stream, connected via a walking and cycling path, will enable people to connect with nature resulting in wellbeing benefits.</p> <p>The cost of the plan change is borne by the applicant, rather than the District Council and ratepayers. This avoids an opportunity cost associated with funding a public plan change process that could be spent on providing for community wellbeing in the Waipā District.</p>	<p>It is anticipated that there may be a social effect of the proposed plan change on the existing rural neighbours that live adjacent to the plan change area, in that the rural character will be replaced with an industrial character. However, industrial development is not unanticipated in the growth cell, having been identified for future industrial development for several years. Furthermore, standards are proposed to manage the interface with rural-residential uses on Swayne and Zig Zags Roads, including a 10m setback, 5m planted strip, and limitation on only light vehicles using Swayne Road to access the Mangaone Precinct.</p>
<b>Cultural</b>	<p>The Applicant recognises the significant heritage and cultural values associated with the Mangaone Precinct Structure Plan Area, and the Mangaone Stream in particular. As a result, Fonterra have agreed to adopt and implement the 15 recommendations set out in the Cultural Values Assessment attached as Appendix M to the main application.</p> <p>Cultural benefits associated with Plan Change 14 include:</p> <ul style="list-style-type: none"> <li>➤ Protection, enhancement and monitoring of the Mangaone Stream environment including natural inland wetlands and bat habitat;</li> <li>➤ Accidental discovery protocols for future development;</li> <li>➤ Stormwater management to achieve sustainable/best practice outcomes;</li> <li>➤ Providing for the extensive use of local native vegetation where appropriate with a particular focus on maintaining and improving indigenous biodiversity and water quality; and</li> <li>➤ Opportunities to work with local Māori artists to produce artworks and depictions of the cultural legacy of the site.</li> </ul>	<p>The proposal is located within a significant heritage area that spans a relatively large geographic area. For mana whenua, balancing the objectives of industrial progress with the preservation of the heritage elements distributed across this extensive region is a crucial aspect that requires careful planning and thoughtful execution.</p> <p>Ngāti Korokī Kahukura and Ngāti Hauā Iwi Trust have provided contact details so that direction may be sought if adverse cultural effects arise.</p>

### 3.2.3 Efficiency and Effectiveness

This section assesses the efficiency and effectiveness of the provisions in achieving the relevant objectives in accordance with section 32(b)(ii) of the RMA.

Plan Change 14 is considered an efficient method for achieving the plan change objectives because it is funded by the applicant.

The provisions will enable the efficient use of a strategically located land resource, which has been identified as an appropriate location for industrial development for some years. In addition:

- The proposed provisions fit seamlessly with existing Industrial Zone provisions to ensure development of the Mangaone Precinct Structure Plan Area is consistent with adjacent industrial areas and result in high quality urban design.
- The proposed provisions and Structure Plan ensure that development is coordinated with growth and also ensures that the growth cell is developed in an integrated manner.
- The existing provisions of the District Plan require a Structure Plan to be prepared prior to the development within a deferred zone. This proposed plan change inserts a Structure Plan into the District Plan and amends the provisions of the District Plan to link Sections 7 and 15 to the proposed Structure Plan.

Efficiency gains are also achieved through Plan Change 14 enabling the provision of integrated transport and servicing solutions of the Mangaone Precinct.

The plan change provisions are effective in achieving the objectives of the plan change for the following reasons:

- The land would be re-zoned in a timely manner such that land would be available to the development market in the medium term, subject to the funding and development of infrastructure (which will largely be undertaken via development contributions and the installation of infrastructure could be 'developer led' if appropriate).
- The proposed provisions and Structure Plan enable an effective urban form to be achieved across the site.
- The proposed provisions ensure the interface between industrial land uses within the Mangaone Precinct and rural-residential land uses on Swayne Road and Zig Zag Road are appropriately mitigated.
- The proposed provisions and Structure Plan were iteratively developed to incorporate the recommendations of various technical assessments and ensure that potential adverse effects on the environment are appropriately managed.

### **3.2.4 Risks of Acting or Not Acting**

Section 32(2)(c) of the RMA requires, in the evaluation of the proposed provisions, the consideration of the risk of acting or not acting if there is uncertain or insufficient information about the subject matter.

The proposal is supported by a number of technical assessments including landscape and visual, ecology, transport, infrastructure and servicing, geotechnical, archaeological, economic and cultural. The proposed provisions and Structure Plan have been iteratively developed to incorporate recommendations of these technical assessments.

It is therefore considered that there is sufficient and certain information supporting Plan Change 14, and there is little risk associated with the plan change going ahead.

For completeness, it is noted that the risk of not acting (not pursuing this plan change) is that the resource management issue remains unresolved and there is insufficient industrial development capacity available in Cambridge / Waipā District to cater for anticipated industrial growth (noting that the Waipā District has largely exceeded growth predictions / modelling in the past). In addition, having more sections available to the market is expected to positively impact affordability.

### **3.3 SUMMARY OF THE REASONS FOR DECIDING ON THE PROVISIONS**

Progressing a private plan change to the District Plan (Option 3) is the most appropriate way to achieve the objectives because it would provide market-ready industrial land in the medium term to meet anticipated demand in the Cambridge area.

The proposed provisions are effective and efficient in that the amendments to the District Plan, including the Structure Plan, provide an integrated approach that appropriately manages potential adverse effects arising from the implementation of the plan change.



## **4. CONCLUSION**

The main objectives of Plan Change 14 are to enable Waipā District Council to meet their obligations under the NPS-UD and provide sufficient capacity for anticipated industrial development over the medium term in a manner that manages potential adverse effects on the environment. These objectives are considered the most appropriate way to give effect to the purpose of the RMA in that they provide for the reasonably foreseeable needs of future generations while managing adverse effects and safeguarding the life-supporting capacity of the environment.

The proposed provisions, including the proposed Structure Plan, are the most appropriate way to achieve the objectives because they are efficient and effective, and the environmental, economic, social, and cultural benefits outweigh the costs.

There is certain and sufficient information to support Plan Change 14. The cost of implementation is low compared to the cost of not acting.