

# HCC submission

Waikato District Proposed Plan - Hearing 7  
Industrial and Heavy Industrial Zone

January 2020

Sub	HCC Submission	S.42A response	HCC Response
535.24	Retain Policy 4.6.3 Maintain sufficient supply of industrial land.	<p>Eleven submissions have been received in respect to Policy 4.6.3. Of these, seven seek that the notified policy be retained. Others sought reference to NPS-UDC</p> <p>Should additional industrial land be required within the life of the PWDP as a result of the NPS-UDC requirements to constantly monitor the uptake of land within the two industrial zones, then plan changes can be initiated following a required robust analysis to support rezoning for industrial growth.</p>	<p>Retention of this policy is welcomed although ensuring a sufficient supply of industrial land warrants a precautionary approach with existing planned enable capacity unless there is up to date monitoring on uptake.</p> <p>HCC concur with the S42A authors statement that location of industrial land may need to be reviewed as a consequence of changing demand and the Hamilton to Auckland Corridor Plan.</p>
535.25	Retain Policy 4.6.4 Maintain industrial land for industrial purposes	Hamilton City Council supports Policy 4.6.4 because of the sub-regional need for industrial land to be managed and maintained and not lost to other non-industrial purposes, such as large format retail. I agree that this policy should be retained in order to signal the priority to provide for industrial land for industrial purposes.	These changes address the issues raised by HCC and HCC welcomes the priority to provide industrial land for industrial purposes.
535.68	<p><b>Delete</b> 20.1.2 'D6 An office' and 'D7 A retail activity' from the list of discretionary activities. AND</p> <p><b>Add</b> an office and a retailing activity to Rule 20.1.3 Non-Complying Activities, so that they are instead considered as non-complying activities.</p>	In my view, it is appropriate that offices and retail activities have a discretionary activity status. This is because the nature and scale of retail activities can vary considerably.	HCC do not support this approach as it considers a Non-complying activity sends a stronger signal that such activities are not anticipated. The priority is to provide industrial land for industrial purposes as mentioned by the S42A author above.

Table 1

# Key points

- Is there a sufficient supply of industrial land in accordance with the NPS-UDC? If so how is this zoned land to be **maintained** for industrial purposes?
- The S42A gives no mention as to the range of activities or floor area thresholds that could potential occur under the definition of 'office' or 'retail activity'. This (for retail) could range from individual standalone cafes, restaurants, smaller retail outlets or much larger department stores.
- There is a contention in the S42A rebuttal that 'big box retail' is more appropriately located in industrial zones.
- Big box retail is not defined in the proposed plan. Stand alone retail (or offices) can attract pedestrian traffic easily and can be designed to accommodate pedestrians and street frontages in business or town centres

## Key points cont.

- The S42A rebuttal evidence contends the onus is on the resource consent applicant to demonstrate a compelling need to use industrial-zoned for non industrial uses– how is this assessed if there are no assessment criteria in which to assess merits or compelling need?
- There is no consideration of the loss of industrial land to non-industrial activities set out in Attachment 6: Provision cascade for the industrial zone.
- There is a difference between an office or retail activity establishing as a supportive ancillary on-site to an industrial activity (as referred in Policy 4.6.4) compared to stand-alone regional office or large department store in its own right.
- Industrial activities should be able to locate in an industrial zone and operate in an efficient manner without being compromised by non-industrial activities establishing in the zone.