

**Section 32 Report
Part 2**

**Industrial Zone
&
Heavy Industrial Zone**

prepared for the

**Proposed Waikato District
Plan**

July 2018



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I OVERVIEW AND PURPOSE

This s32 analysis should be read in conjunction with Part I Section 32 Report – Introduction to the Evaluation Report for the District Plan Review. Part I provides the context and approach for the evaluation and consultation undertaken in the development of the whole proposed plan. This more detailed analysis addresses the provisions of the Industrial Zone (IZ) and Heavy Industrial Zone (HIZ).

I.1 Topic Description

The District Plan’s industrial zones cater for Waikato District’s industrial land uses. The scale of industrial land use varies throughout the district and these industrial activities are located in a number of different environments.

Some industrial activity is carried out within urban industrial areas with other industrial activities located on the surrounding sites. Other industrial activities are adjacent to more sensitive land uses and need to be managed to strike the right balance between enabling economic activity and ensuring that surrounding properties are not adversely affected. The district also has a number of industrial activities that are legally established and located in a rural context which also need to be recognised and provided for.

Some industrial sites are of local, regional, or in some cases national significance such as the Huntly Power Station. The provisions related to heavy industry enable a range of activities to occur in the zone at a large scale whilst managing the effects of these larger industries on the receiving environment and ensuring the amenity of adjacent sites is maintained.

In order to consistently manage industrial activity throughout the district these zones should be rationalised. Having more than a single industrial zone to cater for different scales of industrial operation is still considered appropriate. It is therefore proposed to create an Industrial Zone and a Heavy Industrial Zone that will apply across the entire district.

This s32 report addresses the management of industrial activities throughout the Waikato District. It also provides the background to the formulation of the Industrial Zone and Heavy Industrial Zone chapters, which has been determined as the most appropriate way of achieving the purpose of the RMA.

I.2 Significance of this Topic

The industrial zones seek to address the following issues:

- Providing for industrial activities at a range of scales in different locations.
- Managing the effects of industry on surrounding land uses.
- Identifying and providing for heavy industrial land use and ensuring the effects of these activities are able to be efficiently and effectively managed.

Industrial activities provide economic and social benefits to the wider community through employment, however they need to be carefully managed to ensure that they do not adversely affect the wider environment.

The provision of large scale employment is significant for the district, ensuring that residents are able to live and work in close proximity and not have to travel outside of the Waikato District to Auckland or Hamilton (for example) for employment. The effects of enabling the industrial land uses are, however, generally restricted to the areas adjacent to existing industrial activity.

1.3 Resource Management Issues to be Addressed

There is a need to provide for a range of industrial and commercial activities to accommodate growth in these sectors and to provide a range of employment opportunities in the Waikato District. While these need to be provided for, some of these uses have the potential to adversely affect the quality of the environment and amenity values. These activities need to be located in appropriate locations to ensure that they do not impact on the provision of more sensitive areas throughout the Waikato District such as the Residential Zone and the natural environment.

The arrangement of industrial use within the zone can also cause adverse effects on other industrial land uses within the zone, through effects such as noise, odour and dust. There is also a need to ensure that industrial land is used for industrial purposes and is not eroded by non-industrial activity. This will ensure conflicting land uses are separated and the operational requirements of industrial land uses are not unduly compromised by issues of reverse sensitivity.

1.4 Current Objectives, Policies, Rules and Methods

Industrial activity is currently managed through a number of zones in the Franklin and Waikato Sections of the Operative Waikato District Plan (OWDP).

Waikato Section

The existing Waikato Section provides for industrial activities via two zones. The Industrial Zone and Heavy Industrial Zone are generally similar in their policy direction, however are distinguished by different standards relating to the management of amenity effects. Differences between the zones arise in relation to noise standards, building and aerial height, building setbacks, subdivision allotment sizes, and hours of operation in the Light Industrial Zone adjoining the Living Zone.

The objectives of the Waikato Section zones seek to protect industrial sites from the effects of reverse sensitivity, otherwise they are generally concerned with the quality, character and vitality of the urban environment and ensuring the efficient use of infrastructure and services.

Franklin Section

The existing Franklin Section has a number of zones that manage industrial activity. These include the Industrial 2 Zone, the Light Industrial Zone and two zones specific to Tuakau (Tuakau Industrial Zone and Tuakau Industrial Service Zone). Industrial activity is also provided for in the Business Zone. The Franklin Section also includes a number of zones that manage other industrial related activity such as the Timber Treatment Zone, the Maoro Mining Zone and the Aggregate Extraction and Processing Zone.

The objectives of the Franklin Section seek to enable a range of business activities to occur in this part of the Waikato District's established urban industrial areas where performance standards are achieved. They also seek to accommodate industrial activities in locations appropriate to their anticipated effects on amenity and ensure activities avoid, remedy or mitigate effects on amenity values and quality of environment in adjacent areas. Further objectives include ensuring retail and other activities are limited in industrial zones to ensure the industrial zone continues to function economically for industrial land use.

There are differing levels of development enabled as of right across multiple industrial zones within the Waikato District. For example, the Tuakau Industrial Zone and Tuakau Industrial Services Zone in the Franklin Section require resource consent for any development, with a controlled activity being the starting point. In contrast, the Industrial Zone in the Waikato Section allows for a broad range of permitted activities where compliance with performance standards is demonstrated. As a further contrast, the Business Zone in the Franklin Section is even more enabling in the range of permitted commercial and industrial activities.

1.5 Information and Analysis

When undertaking the Tuakau Structure Plan, background reports were commissioned and utilised for the compilation of that document and the later Plan Change 16 (PC16). PC 16 was withdrawn but the information that informed that plan change has been considered in the development of the Proposed Waikato District Plan (PWDP)

1.6 Consultation Undertaken

This matter has been canvassed through the comprehensive consultation and engagement on the wider District Plan review, as well as specific engagement with landowners in respect to the industrial component of the Tuakau Structure Plan 2014 and consequently the work undertaken for PC16.

In addition, a series of open days and stakeholder information days were held during 2015 and the third phase during 2017, these are listed below:

02/06/2015 – Open day Raglan
 03/06/2015 – Open day Te Uku
 04/06/2015 – Open day Te Kowhai
 09/06/2015 – Open day Tamahere
 10/06/2015 – Open day Puketaha
 11/06/2015 – Open day Ngaruawahia
 16/06/2015 – Open day Whitiakahu
 17/06/2015 – Open day Orini
 18/06/2015 – Open day Te Akau
 23/06/2015 – Open day Matangi
 24/06/2015 – Open day Huntly
 25/06/2015 – Open day Tuakau
 30/06/2015 – Open day Waerenga
 01/07/2015 – Open day Mangatani
 02/07/2015 – Open day Pokeno

07/07/2015 – Open day Te Kauwhata
 08/07/2015 – Open day Port Waiakto
 09/07/2015 – Open day Otaua
 23/07/2015 – Extended working group workshop
 25/03/2015 – Extended working group workshop
 27/08/2015 – Consultants workshop
 19/01/2015 – Presentation to Extended Working Group
 17/10/2017 – Stakeholder information day in Ngaruawahia town hall;
 19/10/2017 – Stakeholder information day in Tuakau town hall;
 20/11/2017 – Open day Tuakau;
 22/11/2017 – Open day Mangatangi;
 23/11/2017 – Open day Pokeno;
 28/11/2017 – Open day Te Kauwhata;
 29/11/2017 – Open day Huntly;
 30/11/2017 – Open day Raglan;
 05/12/2017 – Open day Te Kowhai;
 06/12/2017 – Open day Tamahere; and
 07/12/2017 – Open day Ngaruawahia.

In the main verbal feedback from these information days was confined to the existing industrial locations of Tuakau. Owners in this area lobbied Council to have provisions that would enable development rather than hinder industrial investment. The first section of the following table refers to informal feedback received generally on the Industrial Zone. The second section of the table specifically refers to the Heavy Industrial.

Table I Specific consultation processes

Section I General Comments – Industrial Zone	
Subject Matter	Feedback
Industrial Zone provisions at Horotiu	Requested involvement in the development of industrial provisions at Horotiu.
Reverse sensitivity	Requested that the Fonterra Dairy Factory be specifically mentioned in objectives and policies as Hamilton Airport has, that noise contours from the factory operation be mapped and that reverse sensitivity be considered as an assessment matter for restricted discretionary applications concerning surrounding land.
Industrial provisions Horotiu	Requested that existing Schedule 24B be retained, albeit with amendments to recognise existing and consented developments and bespoke provisions that include changes to the Noise Control Boundary.

Provision for community correction facilities	Requested that community correction facilities be permitted in the Industrial Zone, that specific objectives and policies be provided to enable correction facilities and that the definition of 'community activity' incorporates this activity.
Landscaping rule	Support for the landscaping rule subject to an amendment to encourage the use native species.
Change of zoning	Two requests for their existing industrial zoning to be replaced with the Residential Zone.
Extent of proposed industrial zoning on Ridge Road property	Amend the extent of the proposed Industrial Zone to include the full extent of yard and processing areas and wastewater and stormwater treatment and disposal areas.
Zoning of Maioro Mine site	Request for existing Maioro Mining Zone to be retained otherwise rezone to Industrial.

Section 2 General Comments – Heavy Industrial Zone

Landscaping rule	Support for the landscaping rule subject to an amendment to encourage the use of native species.
Ash water pipeline and ash disposal ponds	Roll over existing provisions in relation to these but with improved wording. Extend the existing 'Energy Surface Facility Area' so it incorporates this pipeline and disposal ponds. Alternatively, show this existing pipeline on the planning maps and zone the ash pond area.
Building height	Request for a specific rule for maximum height of 60m on the Huntly Power Station site and a maximum of 35m over 90% of this site.
Traffic generation	Support for the existing traffic generation rule.
Zoning of Huntly Power Station site	Support for the existing Heavy Industrial zone.
Non-renewable resources	Request for amendment to framework of objectives and policies to recognise the value of non-renewable resources.

1.7 Iwi Authority Consultation and Advice

1.7.1 Consultation

Clause 3 in Schedule 1 of the RMA sets out the requirements for local authorities to consult with tangata whenua through iwi authorities. Clause 3 also requires local authorities to consult with any person, group or ministry that may be affected by changes made to the District Plan.

Council used the following methods to establish an Iwi Reference Group.

- Joint Management Agreement
- Tai Tumu Tai Pari Tai Ao (Waikato Tainui Environmental Plan)
- Partnerships
- Collaboration

The purpose of the Iwi Reference Group is to provide Council with a single forum to socialise the proposed changes to the OWDP.

The Iwi Reference Group is made up of all Iwi and Hapuu within the Waikato District that Council currently consults with via the resource consent process.

Engagement and consultation with the Iwi Reference Group took place between December 2014 and December 2017. (See Part 1 Section 32 Report – Introduction to the Evaluation Report).

1.7.2 Advice

Clause 4A in Schedule 1 of the RMA sets out the requirements for local authorities to consult with iwi authorities before notifying a proposed plan. Clause 4A(1)(b) requires Council to have particular regard to any advice received on a draft proposed policy statement or plan from those iwi authorities.

Council undertook consultation with the relevant Iwi and Hapuu and through Te Kahui Mangai website and included the following:

Iwi authorities within Waikato District:

- Waikato Tainui
- Ngaati Tamaoho

Iwi for the purpose of the RMA listed on Te Kahui Mangai website:

- Tainui o Tainui

Iwi that have relationships with other districts:

- Hauraki
- Ngaati Maniapoto
- Ngaati Paoa - Hauraki

A summary of the issues identified through consultation and Council's consideration of those issues is listed in Part I Section 32 Report – Introduction to the Evaluation Report.

1.8 Decision-making

A series of workshops were held with Councillors which focused on the following:

- Discussion document
- Issue Statement
- Objectives
- Policies
- Rules
- PC 16 implications
- Specific areas and incorporation of large industrial activities
- Staff workshops canvassing industrial specific issues

Table 2 Summary of decision-making processes

Meeting/Feedback	Document	Decision/direction
Councillors' Workshop	Workshop notes 11 July 2017	Discussion on issues – noise, dwellings or accommodation for workers/caretakers, height, landscaping, prohibited rules.

1.9 Reference to Other Relevant Evaluations

This s32 topic report should be read in conjunction with the following evaluations:

- Strategic Development and Management of Growth
- Infrastructure
- Tangata Whenua
- Transport
- Water supply, stormwater and wastewater
- National Grid
- Renewable electricity generation
- Historic Heritage
- Biodiversity
- Landscape and Natural Character

2 ISSUES, OBJECTIVES, POLICIES AND RULES

2.1 Higher Level Planning Documents and Legislation

2.1.1 National Policy Statement on Urban Development Capacity (NPS-UDC)

The National Policy Statement on Urban Development Capacity (NPS-UDC) directs local authorities to quantify, in broad terms, how much feasible development capacity should be provided in resource management plans and supported with development infrastructure, to enable the supply of housing and business space to meet demand over the short term (1-3 year period), medium term (3-10 year period) and long term (10-30 year period).

The NPS-UDC identifies the Future Proof sub-region as a high-growth urban area. As such, the Future Proof councils (of which the Waikato District Council is one) are required to meet all of the requirements in the NPS-UDC. In order to give effect to the requirements of the NPS-UDC, Waikato District Council, as a high growth area, must ensure the provision of sufficient business development capacity.

The Future Proof Partnership, has undertaken a Business Capacity Assessment as required by the NPS-UDC¹. In terms of industrial land, that assessment identified that there is 299ha of vacant industrial land under its District Plan. This is sufficient industrial land for the entire district over the short, medium and long term. However, with long term demand projected to be 209.4ha, this is close to the total supply available. When considered in more detail, the assessment identifies that there is insufficient capacity in some wards of the Waikato District. The report recommends that Council should monitor demand growth and uptake of industrial land in order to ensure that appropriate volumes are available in appropriate locations.

The Market Economics (ME) report emphasises that industrial land is particularly sensitive to being used for other purposes due to its lower land value. This reiterates the position of the Waikato Regional Policy Statement (WRPS) and the need to protect industrial land for industrial land use.

2.1.2 Waikato Regional Policy Statement 2016

The WRPS provides strong direction on industrial land and industrial activities within the Waikato Region. The Waikato District Plan is required to give effect to the WRPS. The WRPS provides an overview of the resource management issues of the region and states the policies and methods to achieve integrated management of the natural and physical resources. Section 6 of the WRPS relates to the topic of the 'Built Environment' and seeks the development of the built environment in an integrated, sustainable and planned manner consistent with the provisions of the regional growth strategy, Future Proof.

¹ Business Development Capacity Assessment 2017 Future Proof Partners: Hamilton City, Waikato District, Waipa District 12 February 2018; ME Consulting

Policy 6.16 ‘Commercial development in the Future Proof area’ promotes the consolidation of commercial activities within existing commercial centres. A clear mandate is presented in Policy 6.16 which states that “Commercial activities are to be managed to:

- f) *maintain industrially zoned land for industrial activities unless it is ancillary to those industrial activities, while also recognising that specific types of commercial development may be appropriately located in industrially zoned land.*

The Industrial Zone directly provides for this strategic outcome by avoiding non-industrial uses within industrial areas. Policy 6.14 refers to the identification of strategic industrial nodes for future industrial development and avoiding industrial development elsewhere at a scale that could undermine the role of the strategic nodes.

These strategic matters and provisions that have been specifically given effect or had regard to in this chapter are summarised in Table 5 below. These documents broadly identify the resource management issues for the Waikato District and provide the higher level policy direction to resolve these issues

2.1.3 Future Proof Growth Strategy

Future Proof is a growth strategy specific to the Hamilton, Waipa, and Waikato sub-region and has been developed jointly by Hamilton City Council, Waikato Regional Council, and Waipa and Waikato District Councils, as well as Tangata Whenua, the NZ Transport Agency (NZTA) and Matamata-Piako District Council. The strategy aims to manage growth in a collaborative way for the benefit of the Future Proof sub-region both from a community and a physical perspective and, as such, when considering any planning documents, the Future Proof Growth Strategy must be taken into consideration

Table 3 Higher order and guiding documents

Document (Statutory obligation in italics)	Relevant provisions the Industrial topic is required to take into account/give effect to
National Policy Statement Urban Development Capacity (<i>Give effect to</i>)	Entire NPS
Waikato Regional Policy Statement (<i>Give effect to</i>)	Chapter 6 Built Environment 6.14 Adopting Future Proof land use pattern 6.16 Commercial development in the Future Proof area
Future Proof Growth Strategy (<i>Have regard to</i>)	Chapter 7.4 Allocation of Industrial Business Land

2.2 Issues

2.2.1 Issue 1

The evaluation of objectives and provisions in the following sections relate to the resource management issue stated below:

Issue Statement	Chapter 7.4 Allocation of Industrial Business Land
<p>Industrial activities provide an important employment base in the Waikato District and there is a need to ensure that industrial activity is provided for within the District Plan. There is also a need to ensure that industrial activities are able to locate in an industrial zone and operate in an efficient manner without being compromised by non-industrial activities establishing in the zone raising issues of reverse sensitivity and reducing the amount of industrial land that is available.</p> <p>There are also a number of industrial land uses outside of the urban areas of Waikato District that contribute to the economic and social wellbeing of Waikato's communities. These need to be enabled, whilst managing the effects on the surrounding environment.</p>	

2.2.2 Issue 2

The evaluation of objectives and provisions in the following sections relate to the resource management issue stated below:

Issue Statement	Manage the potential effects of industrial land use on the surrounding environment
<p>Industrial activity can give rise to a range of adverse effects, particularly on sensitive environments such as the Residential Zone or Significant Natural Areas. It is important that while industrial activities are facilitated and provided for, that the actual and potential effects of these are managed. This is particularly important where the industrial zone interfaces with other zones.</p> <p>The Nau Mai Business Park is outside of Council's strategic industrial nodes. However, it is a consented and operating industrial area that services Raglan. It is therefore important that this specific location is appropriately managed given its location and context.</p>	

3 SCALE AND SIGNIFICANCE EVALUATION

The level of detail undertaken for the evaluation of the PWDP provisions has been determined by an assessment of the scale and significance of the implementation of these provisions. The scale and significance assessment considered the environmental, economic, social and cultural effects of the provisions. In making this assessment regard has been had to the following, namely whether the provisions:

- (a) are of regional or district wide significance;
- (b) have effects on resources that are considered to be a matter of national importance in terms of section 6 of the RMA;
- (c) adversely affect people's health and safety;
- (d) result in a significant change to the character and amenity of local communities;
- (e) adversely affect those with particular interests including Maaori;
- (f) limit options for future generations to remedy effects;
- (g) whether the effects have been considered implicitly or explicitly by higher order documents; and
- (h) include regulations or other interventions that will impose significant costs on individuals or communities.

The evaluation has focused on those provisions that will result in a substantial change to the industrial zones and are of greater importance to ensure the objective of the industrial zone chapters (and other objectives where relevant) are achieved. The majority of changes proposed to the current provisions involve the consolidation of the multiple industrial zones into two zones in the PWDP. This is a significant change for the northern area of the district (ie: the Franklin Section).

As the objectives and policies for the proposed industrial zones are the same, with differentiation addressed in the policies, the suite of industrial provisions has been assessed as a bundle. The policies and rules have been evaluated as a package, as together they address a particular issue and seek to meet a specific objective. The assessment has provided more detail where the rules of the Industrial Zone and the Heavy Industrial Zone deviate from one another.

The following table contains a summary of the policies and rules considered to be of a scale and significance to justify a more comprehensive evaluation of options.

Table 4 Scale and significance assessment

Issue	Provisions evaluated	Scale and Significance Reasoning
<p>Provide for the growth and management of all industrial activities in the Waikato District.</p>	<p>4.6.1 Objective – Economic Growth of Industry The economic growth of the district’s industry is supported and strengthened in industrial zones</p> <p>Policies: 4.6.2 - Provide Industrial Zones with Different Functions 4.6.3 - Maintain a Sufficient Supply of Industrial Land 4.6.4 - Maintain Industrial Land for Industrial Purposes 4.6.5 - Recognition of Industrial Activities outside of Urban Areas</p> <p>4.6.6 Objective – Manage Adverse Effects The amenity values of sensitive activities and ecosystem values outside of industrial zones are protected from the significant adverse effects of industrial activities.</p> <p>4.6.8 - Specific activities within Nau Mai Business Park</p> <p>Zone: Industrial Zone Chapter 20</p>	<p>Industrial activity within the Waikato District is provided for under the existing district plan provisions. A fragmented approach to addressing and managing industrial activity, particularly within the Franklin Section means that there are several different suites of provisions relating to similar activities and effects across the district.</p> <p>The proposed district plan seeks to consolidate the management of industrial activity into two different zones, the Industrial Zone and Heavy Industrial Zone.</p> <p>While the Industrial Zone is located throughout the district, the majority of this zone is already established and operating. The consolidation of the management of industrial land use within the district is not considered to be of a high scale or significance to how industrial activity is managed and therefore the level of detail in this s32 corresponds accordingly.</p> <p>Industrial land use is managed by two</p>

	<p>Heavy Industrial Zone Chapter 21</p> <p>Activity Status Tables: 20.1 Industrial; 20.5 Nau Mai Business Park; and 21.1 Heavy Industrial</p>	<p>different sections in the OWDP and the new provisions will constitute change in the management of industrial land, particularly for sites currently located in the Franklin Section.</p>
<p>Manage the potential effects of industrial land use on the surrounding environment.</p>	<p>4.6.1 Objective – Economic Growth of Industry The economic growth of the district’s industry is supported and strengthened in industrial zones</p> <p>4.6.6 Objective – Manage Adverse Effects The amenity values of sensitive activities and ecosystem values outside of industrial zones are protected from the significant adverse effects of industrial activities.</p> <p>Policies: 4.6.7 - Management of Adverse Effects within Industrial Zones 4.6.9 - Management of Adverse Effects within Nau Mai Business Park</p> <p>Zone: Industrial Zone Heavy Industrial Zone</p> <p>Activity Status Tables 20.1 Industrial; 20.5 Nau Mai Business Park; and 21.1 Heavy Industrial</p>	

	<p>Land Use – Effects 20.2 Industrial; and 20.5 Nau Mai Business Park; and 21.2 Heavy Industrial</p> <p>Land Use – Building 20.3 Industrial; 20.5 Nau Mai Business Park; and 21.3 Heavy Industrial</p>	
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4 EVALUATION OF OBJECTIVES

The following assessment consists of an examination of all reasonably practicable options for achieving Objectives 4.6.1 and 4.6.6. This high-level screening process considers the effectiveness of each option. Only those options considered to be reasonably practicable are evaluated in this section.

Table 5 Reasonably Practicable Options for Achieving Objectives

Objective	Summary of evaluation
<p>4.6.1 Objective – Economic Growth of Industry</p> <p>(a) The economic growth of the district’s industry is supported and strengthened in industrial zones.</p>	<p>This objective addresses the need to support the growth and development of the district’s industrial activities. It ensures that the economic and subsequent social benefits of providing for industrial activity within Waikato District will be enabled.</p> <p>The chosen objective sets a broad policy direction that provides certainty for industrial businesses seeking to establish in the zone, giving effect to the direction of the WRPS.</p>
<p>4.6.6 Objective – Manage Adverse Effects</p> <p>(a) The amenity values of sensitive activities and ecosystem values outside of industrial zones are protected from the significant adverse effects of industrial activities</p>	<p>This objective recognises the need to manage the effects associated with industrial activity. This will ensure that surrounding land uses, people and environment are not adversely affected by industrial activity meeting s5(2)(c) of the RMA.</p>

5 EVALUATION OF PROPOSED POLICIES, RULES AND METHODS

Section 32 (1)(b) requires an evaluation of whether the provisions are the most appropriate way to achieve the objectives by identifying other reasonably practicable options, assessing the efficiency and effectiveness of the provisions in achieving the objectives, and summarising the reasons for deciding on the provisions. The assessment must identify and assess the benefits and costs of environmental, economic, social and cultural effects that are anticipated from the implementation of the provisions, including opportunities for economic growth and employment. The assessment must, if practicable, quantify the benefits and costs and assess the risk of acting or not acting if there is uncertain or insufficient information available about the subject matter.

5.1 Identification of Reasonably Practicable Options – for Achieving Objectives

The following assessment consists of an examination of all reasonably practicable options for achieving Objectives 4.6.1 and 4.6.6. This high-level screening process considers the effectiveness of each option for each objective. Only those options considered to be reasonably practicable will be evaluated in this section.

The existing OWDP is divided into two sections (the Waikato Section and Franklin Section) which contain multiple industrial zones in the Waikato Section that cater for industrial land uses. The Franklin Section also contains a Timber Processing Zone, Maoro Mining Zone and an Aggregate Extraction and Processing Zone.

It is appropriate to determine whether the status quo for managing industrial activity across the district remains the most appropriate way of achieving the objectives of the plan or whether this could be achieved in a more effective and efficient manner.

In addressing the number of industrial zones, there are a number of possible options available to achieve the chosen objectives. These range from implementing a do-nothing position - rolling over the provisions from the existing two sections of the Waikato District Plan, consolidating the existing zones into one industrial zone or consolidating the existing zones to a smaller number of industrial zones.

Table 6 Reasonably Practicable Options for Achieving Objective

Objectives	<p>4.6.1 The economic growth of the district’s industry is supported and strengthened in industrial zones.</p> <p>4.6.6 The amenity values of sensitive activities and ecosystem values outside of industrial zones are protected from the significant adverse effects of industrial activities.</p>				
Options	Description (brief)	Relevance	Feasibility	Acceptability	Recommendation
Approach to achieve objectives	Describe the option and acknowledge the source of this option (if there is one e.g. feedback from consultation, suggestions from workshops with elected members etc).	How effective provisions are in achieving the objective(s).	Within council’s powers, responsibilities and resources, degree of risk and uncertainty of achieving objectives, ability to implement, monitor and enforce.	Level of equity and fair distribution of impacts, level of community acceptance. Where possible identify at a broad level social, economic, environmental, cultural effects	Discard or evaluate further (with brief explanation).
Option 1: Do nothing – remove all policies and associated methods	Remove all policies and associated methods for the industrial zones.	Likely to be ineffective, as no further direction or detail is provided.	Unlikely to achieve the objective as there would be a lack of certainty regarding the outcome of any development	A lack of direction would either result in unrestrained development or no development due to uncertainty on behalf of the development community. Each of these outcomes is considered to be	<p>Discard.</p> <p>This option would not deliver certain outcomes for industrial land use.</p>

				undesirable.	
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Objectives	<p>4.6.1 The economic growth of the district's industry is supported and strengthened in industrial zones.</p> <p>4.6.6 The amenity values of sensitive activities and ecosystem values outside of industrial zones are protected from the significant adverse effects of industrial activities.</p>				
Options	Description (brief)	Relevance	Feasibility	Acceptability	Recommendation
Approach to achieve objectives	Describe the option and acknowledge the source of this option (if there is one e.g. feedback from consultation, suggestions from workshops with elected members etc).	How effective provisions are in achieving the objective(s).	Within council's powers, responsibilities and resources, degree of risk and uncertainty of achieving objectives, ability to implement, monitor and enforce.	Level of equity and fair distribution of impacts, level of community acceptance. Where possible identify at a broad level social, economic, environmental, cultural effects	Discard or evaluate further (with brief explanation).
Option 2: Status quo: Waikato Section – retain existing policies	Retain the existing Waikato Section framework relying on the broad policies associated with the suite of objectives that relate to the urban environment and the Industrial Zone and Heavy	The provisions of the current Waikato Section do enable industrial development to occur throughout the Waikato District. There have however, been a number of changes in higher order	Council is able to roll over provisions. However the district plan is required to give effect to the WRPS and therefore there are changes that are required from the operative version of the plan in order to	This option would enable development to continue for the duration of the life of the operative district plan. This is likely to have little resistance from the community as it would retain a framework that is	Discard. While known and understood by the community, the district plan is required to give effect to a number of higher order policy documents that were not in effect during the

	Industrial Zone.	policy documents that need to be	meet these requirements and	familiar to developers and the	development of the OWDP, and
Objectives	<p>4.6.1 The economic growth of the district's industry is supported and strengthened in industrial zones.</p> <p>4.6.6 The amenity values of sensitive activities and ecosystem values outside of industrial zones are protected from the significant adverse effects of industrial activities.</p>				
Options	Description (brief)	Relevance	Feasibility	Acceptability	Recommendation
Approach to achieve objectives	Describe the option and acknowledge the source of this option (if there is one e.g. feedback from consultation, suggestions from workshops with elected members etc).	How effective provisions are in achieving the objective(s).	Within council's powers, responsibilities and resources, degree of risk and uncertainty of achieving objectives, ability to implement, monitor and enforce.	Level of equity and fair distribution of impacts, level of community acceptance. Where possible identify at a broad level social, economic, environmental, cultural effects	Discard or evaluate further (with brief explanation).
	Retain the existing Waikato Section framework relying on the broad policies associated with the suite of objectives that relate to the urban environment and the Industrial Zone and Heavy Industrial Zone.	addressed in the district plan. The proposed changes to the objectives which are more directive than those in the operative district plan means that the associated policies and methods need to be reviewed. It is also	make the plan consistent.	wider community alike.	including the Franklin Section.

		not practicable to retain two different planning regimes.			
Objectives	<p>4.6.1 The economic growth of the district's industry is supported and strengthened in industrial zones.</p> <p>4.6.6 The amenity values of sensitive activities and ecosystem values outside of industrial zones are protected from the significant adverse effects of industrial activities.</p>				
Options	Description (brief)	Relevance	Feasibility	Acceptability	Recommendation
Approach to achieve objectives	Describe the option and acknowledge the source of this option (if there is one e.g. feedback from consultation, suggestions from workshops with elected members etc).	How effective provisions are in achieving the objective(s).	Within council's powers, responsibilities and resources, degree of risk and uncertainty of achieving objectives, ability to implement, monitor and enforce.	Level of equity and fair distribution of impacts, level of community acceptance. Where possible identify at a broad level social, economic, environmental, cultural effects	Discard or evaluate further (with brief explanation).
Option 3: Status quo: Franklin Section – retain existing policies	Retain the existing Franklin Section framework relying on the broad policies associated with the suite of objectives that relate to the urban environment and the multiple industrial zones.	The existing Franklin Section enables industrial development to occur in this part of the Waikato District. There have, however, been a number of changes in higher order policy	Council is able to roll over the Franklin Section provisions. However, the district plan is required to give effect to the WRPS and there are changes that are required to the	This is likely to have little resistance from the community as it would retain a framework that is familiar to developers and the wider community alike.	Discard. While known and understood by the community, the district plan is required to give effect to a number of higher order policy documents that were not in effect during the

		documents that need to be addressed in the district plan. The	Franklin Section to meet those		development of the OWDP, including the Franklin Section.
Objectives	<p>4.6.1 The economic growth of the district's industry is supported and strengthened in industrial zones.</p> <p>4.6.6 The amenity values of sensitive activities and ecosystem values outside of industrial zones are protected from the significant adverse effects of industrial activities.</p>				
Options	Description (brief)	Relevance	Feasibility	Acceptability	Recommendation
Approach to achieve objectives	Describe the option and acknowledge the source of this option (if there is one e.g. feedback from consultation, suggestions from workshops with elected members etc).	How effective provisions are in achieving the objective(s).	Within council's powers, responsibilities and resources, degree of risk and uncertainty of achieving objectives, ability to implement, monitor and enforce.	Level of equity and fair distribution of impacts, level of community acceptance. Where possible identify at a broad level social, economic, environmental, cultural effects	Discard or evaluate further (with brief explanation).
		proposed changes to the objectives which are more directive than those in the Franklin Section means that the associated policies and methods need to be reviewed. It is also			

		not practicable to retain two different planning regimes.			
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Objectives	<p>4.6.1 The economic growth of the district's industry is supported and strengthened in industrial zones.</p> <p>4.6.6 The amenity values of sensitive activities and ecosystem values outside of industrial zones are protected from the significant adverse effects of industrial activities.</p>				
Options Approach to achieve objectives	Description (brief) Describe the option and acknowledge the source of this option (if there is one e.g. feedback from consultation, suggestions from workshops with elected members etc).	Relevance How effective provisions are in achieving the objective(s).	Feasibility Within council's powers, responsibilities and resources, degree of risk and uncertainty of achieving objectives, ability to implement, monitor and enforce.	Acceptability Level of equity and fair distribution of impacts, level of community acceptance. Where possible identify at a broad level social, economic, environmental, cultural effects	Recommendation Discard or evaluate further (with brief explanation).
Option 4 One Industrial Zone	Consolidate all multiple industrial zones into one industrial zone	The provisions would be able to achieve the broad objectives for industrial activity. This option would however reduce the ability to respond in a consistent manner to a range of different contexts	Council is able to consolidate the existing plethora of industrial zones and rationalise these down to one zone. This would create a consistent approach to industrial development throughout the district.	This approach would ensure industrial development is consistent throughout the district. It may however lack the ability to respond to different contexts in an efficient and consistent manner. This would mean a	Discard. The rationalisation of the multiple industrial zones represents an efficient approach to development across the district, however it is considered to reduce the flexibility of the multi zone approach. One size does not necessarily

				need to adopt a	fit all and it is
Objectives	<p>4.6.1 The economic growth of the district's industry is supported and strengthened in industrial zones.</p> <p>4.6.6 The amenity values of sensitive activities and ecosystem values outside of industrial zones are protected from the significant adverse effects of industrial activities.</p>				
Options	Description (brief)	Relevance	Feasibility	Acceptability	Recommendation
Approach to achieve objectives	Describe the option and acknowledge the source of this option (if there is one e.g. feedback from consultation, suggestions from workshops with elected members etc).	How effective provisions are in achieving the objective(s).	Within council's powers, responsibilities and resources, degree of risk and uncertainty of achieving objectives, ability to implement, monitor and enforce.	Level of equity and fair distribution of impacts, level of community acceptance. Where possible identify at a broad level social, economic, environmental, cultural effects	Discard or evaluate further (with brief explanation).
				conservative approach to enabling and managing industrial development in order to ensure effects on neighbouring properties are well managed.	considered that a middle ground will be more effective.

Objectives	<p>4.6.1 The economic growth of the district’s industry is supported and strengthened in industrial zones.</p> <p>4.6.6 The amenity values of sensitive activities and ecosystem values outside of industrial zones are protected from the significant adverse effects of industrial activities.</p>				
Options Approach to achieve objectives	Description (brief) Describe the option and acknowledge the source of this option (if there is one e.g. feedback from consultation, suggestions from workshops with elected members etc).	Relevance How effective provisions are in achieving the objective(s).	Feasibility Within council’s powers, responsibilities and resources, degree of risk and uncertainty of achieving objectives, ability to implement, monitor and enforce.	Acceptability Level of equity and fair distribution of impacts, level of community acceptance. Where possible identify at a broad level social, economic, environmental, cultural effects	Recommendation Discard or evaluate further (with brief explanation).
Option 5: Multiple Industrial Zones	Consolidate the existing industrial zones into a lesser number of industrial zones.	The provisions would be able to achieve the broad objectives for industrial activity. This option would enable the plan to respond to a range of different contexts in an efficient and consistent manner.	Consolidating the industrial zones would enable a more consistent approach to industrial development throughout the district, whilst providing sufficient flexibility to managed these.	This would ensure there is a level of consistency in managing industrial activities throughout the district whilst enabling Council to cater for different types of industrial activity and different locations.	Evaluate further. This option achieves consistency over the district.

5.2 Evaluation of Selected Options

This section contains an assessment of those options identified above for further evaluation. The short list of options has been developed further to include (where relevant) policies, rules and methods. In some instances, provisions have been bundled where they are expected to work together to achieve the objectives.

For efficiency, this second tier evaluation focuses on the approach and the policies and rules which implement that approach as a package, rather than a detailed analysis of every policy and every rule. How this section is approached in terms of level of detail depends to what extent the options are departing from the existing OWDP and the significance of the alternative options. The following table provides a summary of the evaluation results.

The earlier options analysis weighed the most appropriate response to achieving the objectives and are determined to be the most appropriate for managing industrial activities within the Waikato District.

Due to the range of industrial zones in the Waikato and Franklin Sections of the Operative District Plan, the initial options analysis focused on the best way to manage industrial land use in the future. The options considered the retention of multiple industrial zones, the complete rationalisation of industrial zones to one zone or a rationalisation of the existing zones to a lesser number to provide more efficiency whilst retaining the ability to manage different industrial activities through different zones.

The initial analysis determined that the most appropriate way to manage industrial land use moving forward is to rationalise the industrial zones. Furthermore, and taking into account the range of industrial activities in the Waikato District, it is considered that one industrial zone represents an approach that would either be too rigid in managing industrial activity across the district or it would need to have a range of rules to address heavier or more intrusive industrial activities.

In considering the use of multiple industrial zones, the options include implementing a light or service industrial zone, a general industrial zone and a heavy industrial zone.

The Franklin Section includes a Light Industrial Zone at Pokeno. In terms of managing activities, this zone enables non-industrial uses to establish rather than restricting it to just industrial uses. It also implements more stringent controls over performance standards relating to amenity such as height and noise limits.

The difference between light industry and general industry activities can be difficult to distinguish and effects on sensitive surrounding land uses are likely to be similar or be able to be controlled through performance standards that relate to the interface with adjacent sites depending on their land use category. By restricting non-industrial activities from locating within the industrial zone, as per the direction of the WRPS, the level of amenity within the zone is expected to be lower than if a range of non-industrial activities were allowed to establish. Taking the above into account, it is considered that there is no need to include a light industrial zone in the PWDP.

The Waikato District is home to a number of heavy industrial sites and activities such as a number of dairy factories, the Horotiu meatworks and the Huntly Power Station. Activities such as these tend to operate for longer hours, require large buildings and can be noisier than smaller industrial activities. For this reason, it is considered there is a need to retain the Heavy Industrial Zone. This will enable such activities to continue to operate and provide certainty of investment for the operators of those larger sites.

Taking the above into account, it is proposed to manage the industrial land through two different industrial zones; a general purpose 'Industrial Zone' and a 'Heavy Industrial Zone'. It is considered that this approach most appropriately achieves the objectives determined to best give effect to the purpose of the RMA.

Further analysis is therefore required to address the policy and methods most appropriate to implement the optimum outcome.

This will be assessed in stages. Firstly, by establishing policies that most appropriately achieve the determined objectives. Secondly, by analysing the most appropriate methods to achieve the objectives and maintain consistency with the chosen policy and zoning framework in relation to land use activities, the built form, effects of activities and subdivision for both the Industrial Zone and Heavy Industrial Zone.

5.3 Objective 4.6.1

The economic growth of the district's industry is supported and strengthened in industrial zones.

This objective seeks to provide certainty to Waikato District's industrial land uses. The objective needs to be supported by related policies that provide direction on how this is to be achieved, with appropriate methods that enable industrial activities to locate in an industrial zone.

5.3.1 Identification of Options

In considering options for managing and enabling industrial land uses, a number of factors were taken into account including:

- The need to ensure industrial land is used for industrial purposes as per the directions of the WRPS.
- The need to ensure a sufficient supply of industrial land as per the requirements of the NPS-UDC.
- The diversity of industrial land use and the need to recognise heavy industrial land use.
- The need to consider the Future Proof Growth Strategy.
- The need to provide a consistent framework across the district as envisaged in the now withdrawn PCI6.
- The need to consider existing uses on already zoned sites.

Options considered for providing for industrial land use included:

- A policy framework that provides clear direction on the use of industrial land versus one that stayed silent.
- An enabling activity status table that provides for industrial land uses as permitted activities or an activity status table that requires resource consent for a range of activities.
- An activity status table that restricts non-industrial development versus one that enables industrial development.

5.3.2 Policy, Rule and Method Evaluation

This section assists to identify the provisions (i.e. policies, rules and methods) that are the most appropriate to achieve the objective.

Table 6 Reasonably Practicable Options for Achieving Objective

Provisions most appropriate	Effectiveness and Efficiency	
	Benefits	Costs
<p>A suite of policies that provide clear direction to the use of industrial land.</p> <ul style="list-style-type: none"> - Policy 4.6.2 – Provide Industrial Zones with Different Functions. - Policy 4.6.3 – Maintain a sufficient Supply of Industrial Land. - Policy 4.6.4 – Maintain Industrial Land for Industrial Purposes. - Policy 4.6.5 – Recognition of Industrial Activities outside of Urban Areas. - 4.6.8 Policy – Specific activities within Nau Mai Business Park 	<p>Environmental:</p> <ul style="list-style-type: none"> - The consolidation of industrial activities into the industrial zone mitigates the likelihood of industrial activities being subject to the effects of reverse sensitivity. - The provision of an industrial zone creates an expectation of lower amenity providing a suitable location for industrial development. 	<p>Environmental:</p> <ul style="list-style-type: none"> - The retention of industrial land for only industrial uses consolidates activities that may result in a lower level of amenity in the zone.
	<p>Economic:</p> <ul style="list-style-type: none"> - The recognition and provision of specific defined areas protected for industrial development ensures the security of land supply is maintained in accordance with the Waikato District Growth Strategy and direction of Future Proof. Land zoning encourages 	<p>Economic:</p> <ul style="list-style-type: none"> - Zoning and enablement of land for industrial development requires the significant upfront investment of both Council and developers in relation to roading and associated water, wastewater and stormwater infrastructure, including ongoing

Provisions most appropriate	Effectiveness and Efficiency	
	Benefits	Costs
	<p>investment in industrial sites where development is generally permissive and fosters the development of future employment opportunities.</p> <ul style="list-style-type: none"> - The recognition of previous investment into industrial activities provides economic certainty for the continued operation of those industrial activities. - The suite of provisions is responding to accommodating a range of industrial uses. - The establishment of industrial activities will provide employment opportunities. 	<p>maintenance costs for Council where that infrastructure is vested.</p> <ul style="list-style-type: none"> - The restriction of non-industrial uses in industrial areas has an economic cost for landowners and commercial developers. As with any form of regulation that restricts the ability of the market to establish land uses in the District, there is some associated economic cost. - Limits the type of activities that can establish to genuine industrial activities.
	<p>Social:</p> <ul style="list-style-type: none"> - Enabling the consolidation of industrial land for development will result in the creation of ongoing employment opportunities within the District. 	<p>Social:</p> <ul style="list-style-type: none"> - There are not considered to be any significant social costs as a result of these provisions.
	<p>Cultural:</p> <ul style="list-style-type: none"> - There are not considered to be any significant cultural benefits as a result of these provisions. 	<p>Cultural:</p> <ul style="list-style-type: none"> - There are not considered to be any significant cultural costs as a result of these provisions.
<p>Zoning</p> <ul style="list-style-type: none"> - Heavy Industrial Zone. 	<p>Environmental:</p> <ul style="list-style-type: none"> - The consolidation of industrial activities 	<p>Environmental:</p> <ul style="list-style-type: none"> - The retention of industrial land for only

Provisions most appropriate	Effectiveness and Efficiency	
	Benefits	Costs
- Industrial Zone.	<p>into an industrial zone mitigates the likelihood of industrial activities being subject to the effects of reverse sensitivity.</p> <p>- The provision of an industrial zone creates an expectation of lower amenity providing a suitable location for industrial development.</p>	<p>industrial uses consolidates activities that may result in a lower level of amenity in the zone.</p>
	<p>Economic:</p> <p>- The use of two zones provides for different industrial activities to establish and recognises the different requirements needed for heavier industry to operate.</p>	<p>Economic:</p> <p>- The use of two zones means that the general industrial zone is more restrictive in the activities allowed. This creates an economic restriction however it is not considered to be so restrictive to be overly detrimental to the economic wellbeing of industrial land users.</p>
	<p>Social:</p> <p>- The use of zoning provides certainty for industrial land users therefore assists in creating certainty of an employment base.</p>	<p>Social:</p> <p>- Increased chance of reverse sensitivity and conflict between incompatible uses.</p>
	<p>Cultural:</p> <p>- There are not considered to be any significant cultural benefits as a result of these provisions.</p>	<p>Cultural:</p> <p>- There are not considered to be any significant cultural benefits as a result of these provisions.</p>
An activity status table that enables industrial land use while restricting	<p>Environmental:</p> <p>- The activity status table identifies those</p>	<p>Environmental:</p> <p>- The retention of industrial land for only</p>

Provisions most appropriate	Effectiveness and Efficiency	
	Benefits	Costs
non-industrial activities. - Activity Status Table 20.1 - Activity Status Table 21.1	activities that are suitable for the industrial zone. By enabling industrial activity in the appropriate zone, it enables the effects of activities with lower amenity to be effectively and efficiently managed.	industrial uses consolidates activities that may result in a lower level of amenity in the zone.
	Economic: - The Activity Status table enables industrial activity through the use of permitted activities, providing certainty in the zone.	Economic: - The activity status table restricts the establishment of non-industrial activities. This represents an economic cost to land owners as it restricts various industrial activities on land zoned for this purpose.
	Social: - The Activity Status table enables industrial activity through the use of permitted activities, providing certainty in the zone.	Social: - The activity status table restricts the establishment of non-industrial activities. This represents an economic cost to land owners as it restricts various industrial activities on land zoned for this purpose.
	Cultural: - The Activity Status table enables industrial activity through the use of permitted activities, providing certainty in the zone.	Cultural: - The activity status table restricts the establishment of non-industrial activities. This represents an economic cost to land owners as it restricts various industrial activities on land zoned for this purpose.

Provisions most appropriate	Effectiveness and Efficiency	
	Benefits	Costs
Subdivision standards that enable subdivision of industrial land whilst managing the size of future lots to ensure they are able to accommodate industrial activities.	Environmental: - Allowing subdivision to occur will enable large sites to be subdivided for other activities, enabling more efficient use of land.	Environmental: - Concentrating industrial land use may result in concentrations of effects from multiple activities creating effects on amenity, and infrastructure.
Subdivision standards: - 20.4.1 Subdivision – General - 20.4.2 Subdivision – Boundaries for Records of Title - 20.4.3 Subdivision – Road Frontage	Economic: - Requiring minimum lot sizes in the industrial zone ensures that future industrial land use will not be compromised by sites that are too small to accommodate industrial activity.	Economic: - Restricting subdivision will result in an economic cost to land owners who may be able to subdivide their sites if less restrictive provisions were to apply.
	Social: - Requiring minimum lot sizes in the industrial zone ensures that future industrial land use will not be compromised by sites that are too small to accommodate industrial activity.	Social: - Restricting subdivision will result in an economic cost to land owners who may be able to subdivide their sites if less restrictive provisions were to apply.
	Cultural: - Requiring minimum lot sizes in the industrial zone ensures that future industrial land use will not be compromised by sites that are too small to accommodate industrial activity.	Cultural: - Restricting subdivision will result in an economic cost to land owners who may be able to subdivide their sites if less restrictive provisions were to apply.

Opportunities for economic growth and employment

The Industrial Zone and Heavy Industrial Zone will create economic growth and employment. Generally, these zones are located adjacent to, or within, existing towns and villages. This creates opportunities for people to work in close proximity to where they live. The range of activities enabled in these two zones will provide a range of employment opportunities.

Options less or not as appropriate to achieve the objective

Retain the status quo – providing a broad policy suite and an activity status regime that reflects the multiple industrial zones in both sections of the operative district plan.

Appropriateness:

The current policy framework does not adequately address the requirements of the WRPS. The lack of policy direction does not provide sufficient certainty of outcome to the community. It is considered that retaining the existing range of industrial zones is not an efficient way to manage the industrial land resource and this could be more effectively managed through the rationalisation of the industrial zone and the consistency of one planning regime.

Option 2: Adopt a more enabling policy framework that enables a wider range of land uses to establish in an Industrial Zone.

Appropriateness:

This option is contrary to the direction of the WRPS which the district plan must give effect to.

Risk of acting or not acting

Uncertainty or insufficiency of information:

It is considered there is sufficient information available and the current effects of enabling industrial activity to occur are adequately understood. The proposed changes to the plan differ from the current approach as they seek to rationalise provisions relating to industrial land use. It seeks to establish a framework that manages the location and effects of industrial development to ensure that industrial activities are able to operate and establish in the Waikato District, providing economic and social benefits without unduly affecting the surrounding environment. The risk of not acting would potentially result in inefficient use of industrial land for

industrial purposes. The provisions manage the expectations arising from PCI6 and manage industrial land and activities across the district in a comprehensive and consistent manner.

Risk of acting or not acting:

It is considered the risks associated with the preferred option are low. It represents a change to simplify how industrial land uses are managed in the Waikato District. The range of activities enabled in an industrial zone reflects the policy direction of the WRPS and serves to ensure industrial land is used for industrial purposes.

Efficiency and effectiveness

Efficiency

Providing a clear policy direction on the types of industrial activity provided for in the Industrial Zone provides certainty to industrial land owners and activities, which assists in enabling industrial development. The clear direction to maintain industrial land for industrial purposes will ensure that it is not undermined by non-industrial activity, ensuring that land is available for industrial uses and its cost is not influenced by commercial development.

Reinforcing this policy position with an activity status table that enables industrial development and restricts non-industrial development in both the Industrial Zone and Heavy Industrial Zone will reinforce the policy position and effectively and efficiently achieve the objective of supporting industrial development in the Waikato District.

The use of these two industrial zones represents a more efficient management of industrial land. This means that industrial investors do not have to anticipate the requirements of multiple industrial zones.

Effectiveness

The proposed changes to the management of industrial activity provide an effective approach to achieving this objective. The rationalisation of industrial zones provides a clear and straight forward framework for industrial activity within the district.

- The policies provide a strong framework for industrial development.
- The policies provide an opportunity to align all the current industrial zones in the district.
- Clearly identify the location of the industrial zones provides the opportunity for economic development to be considered.

5.4 Objective 4.6.6

The amenity values of sensitive activities and ecosystem values outside of Industrial Zones are protected from the significant adverse effects of industrial activities. This objective seeks to ensure that the effects of industrial land use are managed so that more sensitive land uses and areas outside of the industrial zone are not adversely impacted. The objective needs to be supported by related policies that provide direction on how this is to be achieved, with appropriate methods that establish appropriate performance standards for industrial activities.

The Nau Mai Business Park is a site-specific light industrial business park located near Raglan. This business park was established via a number of resource consents and formalised through Plan Change 14 to the OWDP.

The PWDP seeks to retain the Nau Mai Business Park and enable its continued development, despite this being outside of the district's strategic industrial nodes. The effects of the business park on surrounding land also need to be managed to ensure that activities within it do not adversely affect other land users or the surrounding zone. The Nau Mai Business Park is proposed to be managed through a specific set of provisions that generally roll over the existing provisions that are contained with Schedule 24F of the Waikato Section.

5.4.1 Identification of Options

In considering options for managing the effects of industrial activity, a number of factors were taken into account including:

- The need to ensure industrial land is able to be used for industrial purposes as per the directions of the WRPS.
- The need to manage the effects of industrial activity on:
 - o Other industrial sites.
 - o Other more sensitive activities outside the industrial zone.
 - o The wider environment.
- The diversity of industrial land use and the need to recognise heavy industrial land use.

In considering the management of the Nau Mai Business Park the following aspects were considered.

- The recent plan change to formalise the Nau Mai Business Park through zoning and the Schedule 24F provisions.
- The need to ensure industrial land is able to be used for industrial purposes as per the directions of the WRPS.
- The need to manage the effects of land use in the Nau Mai Business Park on:
 - o Other sites.
 - o Other more sensitive activities outside the Nau Mai Business Park.
 - o The wider environment.

Options considered for managing the effects of industrial land use included:

- A policy framework that provides clear direction on the effects of industrial land to be managed versus one that addresses effects at a broad level.
- An activity status table that restricts non-industrial development within the zone versus one that provides for some non-industrial uses as of right.
- One industrial zone or multiple industrial zones.
- General performance standards that manage the effects of industrial land use including bulk and location standards and environmental performance standards versus performance standards for heavy industry and general industrial zones.

Options considered for managing the operation and development of the Nau Mai Business Park included:

- The adoption of the previous provisions versus drafting new provisions for the Nau Mai Business Park.

5.4.2 Policy, Rule and Method Evaluation

This section assists to identify the provisions (i.e. policies, rules and methods) that are the most appropriate to achieve the objective.

Table 8 Evaluation of provisions

Provisions most appropriate	Effectiveness and Efficiency	
	Benefits	Costs
<p>A suite of policies that provide clear direction to managing the effects of industrial land.</p> <ul style="list-style-type: none"> - Policy 4.6.7 – Management of Adverse Effects within Industrial Zones. - 4.6.9 Policy - Management of Adverse Effects within Nau Mai Business Park 	<p>Environmental: Industrial land use can result in a range of adverse effects due to the types of operations associated with industrial activities. This is particularly true of heavy industrial activities. Managing the effects of industrial development ensures that an acceptable level of effects are enabled with anything above the determined level requiring scrutiny and careful management to ensure the effects are avoided, remedied or mitigated.</p>	<p>Environmental: Having no management of effects from industrial activities may result in degradation of ecosystems.</p>

	<p>Economic: Managing the effects of industrial activity has long term economic benefits to ensure that industrial activities do not create long term environmental issues.</p>	<p>Economic: There is a level of cost associated with managing effects, whether this restricts industrial activities from operating in the most straight forward manner or the compliance costs associated with meeting requirements of the plan or mitigating adverse effects.</p>
	<p>Social: Managing effects creates a safe environment for communities to live and work.</p>	<p>Social: There are not considered to be any significant social costs of amenity requirements on industrial development as a result of implementing these policies.</p>
	<p>Cultural: There are not considered to be any significant cultural benefits as a result of these provisions.</p>	<p>Cultural: There are not considered to be any significant cultural costs as a result of these provisions.</p>
<p>Zoning - Heavy Industrial Zone Industrial Zone</p>	<p>Environmental: This recognises the different needs of heavy industrial activities and provides for them in appropriate locations.</p>	<p>Environmental: Concentrating heavy industrial activities in the Heavy Industrial Zone, may concentrate their effects rather than spreading them out across the entire industrial zone.</p>
	<p>Economic: This approach enables heavy industry to establish and operate in appropriate locations.</p>	<p>Economic: Restricting land use to appropriate zones may have some economic effects on land and business owners.</p>
	<p>Social: Providing certainty of outcome in terms of where different types of industrial activities may locate would provide a level of certainty regarding amenity for communities who live or work near industrial activities.</p>	<p>Social: Areas adjacent to industrial zones may not recognise their full social potential or vision.</p>

	<p>Cultural: There are not considered to be any significant cultural benefits as a result of these provisions.</p>	<p>Cultural: There are not considered to be any significant cultural costs as a result of these provisions.</p>
<p>An activity Status table that enables industrial land use while restricting non-industrial activities.</p> <ul style="list-style-type: none"> - Activity Status Table 20.1 Activity Status Table 21.1 	<p>Environmental: This identifies which activities are appropriate to establish in the industrial zone. This reduces the effects of reverse sensitivity.</p>	<p>Environmental: There are not considered to be any significant environmental costs associated with controlling the types of activities that locate in the zone.</p>
	<p>Economic: The Activity Status table enables industrial activity through the use of permitted activities, providing certainty in the zone.</p>	<p>Economic: The activity status table restricts the establishment of non-industrial activities. This represents an economic cost to land owners as it restricts the types of activities enabled on industrial zoned land.</p>
	<p>Social: By providing for industrial land uses in the industrial zone, it provides direction for where the community can expect these activities to locate and operate.</p>	<p>Social: There are not considered to be any significant social costs of managing activities in the industrial zones.</p>
	<p>Cultural: - There are not considered to be any significant cultural benefits as a result of these provisions.</p>	<p>Cultural: There are not considered to be any significant cultural costs as a result of these provisions.</p>
<p>Performance Standards that manage the effects of industrial land use:</p> <ul style="list-style-type: none"> - 20.2 Land Use – Effects - 21.2 Land Use – Effects 	<p>Environmental: Setting performance standards relating to the effects of industrial land use means that they are able to be appropriately managed, ensuring industrial activity does not adversely affect the surrounding environment.</p>	<p>Environmental: The standards provide for a higher level of effects to the adjacent sites and may have a greater impact than other activities.</p>

	<p>Economic: There are not considered to be any significant economic benefits associated with the enforcement of amenity provisions on development within an industrial zone.</p>	<p>Economic: Enforcing performance standards comes at the cost of restricting some forms of industrial activity and any associated mitigation costs.</p>
	<p>Social: Managing the effects of industrial activity ensures the wider community is not adversely affected by industrial land use. It also provides certainty to the community on the level of effects anticipated in the zone.</p>	<p>Social: There are not considered to be any significant social costs with managing the effects of industrial activities.</p>
	<p>Cultural: There may be cultural benefits of appropriately managing the effects of industrial activity ensuring that the wider environment is not compromised.</p>	<p>Cultural: There are not considered to be any significant cultural costs of managing the effects of industrial activities.</p>
<p>Performance Standards that manage the effects of heavy industrial land use where they differ from those included in the Industrial Zone:</p> <ul style="list-style-type: none"> - Heavy Industrial Land Use – Effects 21.2 - 21.2.3 Noise – General - 21.2.3.2 Noise – Huntly Power Station <p>21.2.7.1 Signs – General</p>	<p>Environmental:</p> <ul style="list-style-type: none"> - Setting specific noise standards that are more permissive than other zones enables heavy industry to operate with fewer constraints on development. <p>Allowing for larger signs within the Heavy Industrial Zone is consistent with the provision for large scale buildings.</p>	<p>Environmental:</p> <ul style="list-style-type: none"> - The standards provide for a higher level of noise on the boundaries of sites adjacent to the Heavy Industrial Zone. This may have a greater impact on the amenity of adjacent sites. However, these standards in the Waikato Section have been place for a considerable period of time. - The standards provide for longer hours of operation and therefore the effects of the industry operating outside accepted business

		hours are greater. Enabling higher signs may have an adverse effect on the amenity of the surrounding environment.
	<p>Economic:</p> <ul style="list-style-type: none"> - There are not considered to be any significant economic benefits associated with the enforcement of amenity provisions on development within the Heavy Industrial Zone. <p>Recognising and enabling a higher noise limit on the boundaries of Rural sites recognises the importance of enabling the power station to continue to function.</p>	<p>Economic:</p> <p>Enforcing performance standards comes at the cost of restricting some forms of heavy industrial activity and any associated mitigation costs.</p>
	<p>Social:</p> <ul style="list-style-type: none"> - Managing the effects of heavy industrial activity ensures the wider community are not adversely affected by heavier industrial land use. It also provides certainty to the community on the level of effects anticipated in the zone. <p>Recognising and enabling a higher noise limit on the boundaries of the Heavy Industrial Zone also recognises the importance of enabling these activities, particularly the Huntly Power Station.</p>	<p>Social:</p> <p>There are not considered to be any significant social costs with managing the effects of industrial activities.</p>
	<p>Cultural:</p> <p>There may be cultural benefits with appropriately managing the effects of industrial activity ensuring that the wider environment is not compromised.</p>	<p>Cultural:</p> <p>There are not considered to be any significant cultural costs with managing the effects of industrial activities.</p>

<p>Performance Standards that manage the bulk and location of buildings:</p> <ul style="list-style-type: none"> - 20.3 Land Use – Building - 21.3 Land Use – Building 	<p>Environmental: Management of industrial development and the setting of design controls in relation to the general bulk and layout of development will avoid adverse reverse sensitivity or amenity effects on adjoining land use.</p>	<p>Environmental: - Restriction to, or enforcement of, singular design principles within the land use – building and land use – effects provisions is unlikely to result in the most efficient outcome for the use and development of land that would otherwise respond to environmental or site-specific challenges to enable innovative design under flexible provisions.</p>
	<p>Economic: Controlling effects of building within the zone will ensure that other operators are also able to establish and operate in the zone in an efficient manner.</p>	<p>Economic: - Regulation or imposition of strict amenity requirements on industrial development places costs on design and operation for new industry which can be an uneconomic cost in attracting industrial development into defined industrial zones.</p>
	<p>Social: The management of industrial development and enforcement of provisions relating to design controls, in particular within areas where industrial development adjoins sensitive land uses, will protect the overall health and wellbeing of people and enhance the visual amenity of industrial areas when viewed from public spaces.</p>	<p>Social: There are no significant social costs associated with enforcing built form performance standards.</p>

	<p>Cultural: There are not considered to be any significant cultural benefits as a result of these provisions.</p>	<p>Cultural: There are not considered to be any significant cultural costs as a result of these provisions.</p>
<p>Performance Standards that manage the bulk and location of the Heavy Industrial Zone use where they differ from those included in the Industrial Zone:</p> <p>- 21.3.1 Height - General</p>	<p>Environmental:</p> <ul style="list-style-type: none"> - Management of heavy industrial development and the setting of design controls in relation to the general bulk and layout of development will avoid adverse reverse sensitivity or amenity effects on adjoining land use. <p>Providing for increased height in the Heavy Industrial Zone will ensure that these activities are able to establish and operate in specifically zoned locations.</p>	<p>Environmental:</p> <ul style="list-style-type: none"> - Restriction to, or enforcement of, singular design standards may restrict the ability to respond to site specific challenges. <p>The more permissive standards for building height may have an adverse effect on visual amenity in the vicinity of the Heavy Industrial Zone.</p>
	<p>Economic: Controlling the height of buildings within the zone will ensure that other operators are also able to establish and operate in the zone in an efficient manner.</p>	<p>Economic: Regulation of amenity requirements on industrial development can place an economic cost on design and operation for industrial land uses.</p>
	<p>Social: The management of industrial development and enforcement of provisions relating to design controls, in particular within areas where industrial development adjoins sensitive land uses, will protect the overall health and wellbeing of people and enhance the visual amenity of industrial areas when viewed from public spaces.</p>	<p>Social: There are no significant social costs associated with enforcing built form performance standards.</p>

	<p>Cultural: There are not considered to be any significant cultural benefits as a result of these provisions.</p>	<p>Cultural: There are not considered to be any significant cultural costs as a result of these provisions.</p>
<p>Subdivision Standards that require the provision of esplanade reserves and esplanade strips</p> <p>- 20.4.4 Subdivision – Esplanade reserves and esplanade strips</p> <p>21.4.4 Subdivision – Esplanade reserves and esplanade strips</p>	<p>Environmental: The provision of esplanade reserves or strips through subdivision allows for Council to manage the riparian margin of streams, rivers and lakes</p>	<p>Environmental: There are not considered to be any significant environmental costs as a result of these provisions.</p>
	<p>Economic: This provides Council with an effective means of attaining management over esplanade reserves or strips.</p>	<p>Economic: The provision of an esplanade reserve or strip may reduce the size of the proposed subdivision and result in an economic cost to land owners.</p>
	<p>Social: The taking of esplanade reserves or strips provide a social benefit to the community so that waterways may be accessed.</p>	<p>Social: There are not considered to be any significant social costs as a result of these provisions.</p>
	<p>Cultural: There may be cultural benefits of being able to access waterways.</p>	<p>Cultural: There are not considered to be any significant cultural costs as a result of these provisions.</p>
<p>Subdivision standards that manage subdivision of heritage sites</p> <p>- 20.4.5 Subdivision of land containing a heritage item</p>	<p>Environmental: The provisions allow Council to manage the effects of development on heritage items addressing its s6 responsibilities.</p>	<p>Environmental: There are not considered to be any significant environmental costs associated with controlling the subdivision of sites heritage items.</p>
	<p>Economic: Enabling subdivision of land that contains heritage items where appropriate allows for economic opportunities to occur.</p>	<p>Economic: Subdivision may be restricted due to adverse effects on a heritage item, resulting in an economic cost.</p>

<p>Social: Controlling subdivision on land containing a heritage item will ensure that the heritage values are not adversely affected.</p>	<p>Social: There are not considered to be any significant social costs as a result of these provisions.</p>
<p>Cultural: There may be cultural benefits with being able to access waterways.</p>	<p>Cultural: There are not considered to be any significant cultural costs as a result of these provisions.</p>

Opportunities for economic growth and employment

This objective is concerned with managing the effects of development. While it does not specifically provide for economic growth and employment, management of the effects of industrial activity will help to achieve sustainable management, ensuring activities locate and operate where they do not adversely affect the environment or other land users therefore providing certainty for continued operations.

Options less or not as appropriate to achieve the objective

Option 1: Status quo:

The current approach includes a number of different sets of standards to manage the effects of industrial activities across the district. The approach across the different zones has some overlap, however each zone represents a slightly different management regime.

Appropriateness:

It is considered that efficiency can be gained from consolidating the industrial zones in the Waikato District. Rolling over the multiple sets of provisions to manage the environment is inefficient and it may allow a more tailored response to each locational context. However, it is considered more effective to provide certainty across the industrial zone and set standards appropriate for all locations, relying on the resource consent process to manage those activities that seek to operate outside of the performance standards.

Risk of acting or not acting

Uncertainty or insufficiency of information:

It is considered that the effects of industrial activity are sufficiently understood to establish a management framework for the industrial zone. Using an approach that determines an acceptable level of effect before requiring resource consent means that effects on others can be considered once they reach a determined point.

Risk of acting or not acting:

If standards are not provided, then there is limited ability to manage the effects of industrial activities. It is considered that the risks of not acting outweigh those of acting and potentially limit the establishment of some activities or increase compliance costs.

Efficiency and effectiveness

Efficiency:

By establishing performance standards, the district plan determines a level of effect that is considered appropriate within the two industrial zones. The policies recognise that adverse effects can be generated by industrial activities on surrounding areas and the suite of provisions is the most effective way to manage these and provide a consistent framework across the district.

Effectiveness:

The proposed standards include provisions that are considered to adequately manage the effects of industrial activity across the district, recognising that different levels of amenity are anticipated in the Industrial Zone and Heavy Industrial Zone. The provisions are effective in that they avoid incompatible activities such as those of a residential nature or other sensitive land uses from establishing thus resulting in reverse sensitivity issues. This is in line with WRPS Policy 6.1 which provides direction for Council when managing reverse sensitivity. Activities that operate outside of these standards will be required to show how they meet the relevant objectives and policies. All industrial activities within the two zones will be required to meet the performance standards or require resource consent.

5.4.3 Policy, Rule and Method Evaluation (Nau Mai Business Park)

This section assists to identify the provisions (i.e. policies, rules and methods) that are the most appropriate to achieve the objective in relation to the Nau Mai Business Park.

Table 9 Evaluation of provisions

Provisions most appropriate	Effectiveness and Efficiency	
	Benefits	Costs
<p>A suite of policies that provide clear direction to managing the effects of industrial land.</p> <ul style="list-style-type: none"> - Policy 4.6.8 – Specific Permitted Activities within Nau Mai Business Park - Policy 4.6.9 – Management of Adverse Effects within the Nau Mai Business Park <p>Zoning</p>	<p>Environmental: Management of industrial development and the setting of design controls in relation to the general bulk and layout of development within the Nau Mai Business Park will avoid adverse reverse sensitivity or amenity effects on adjoining land use.</p>	<p>Environmental: Any restriction to, or enforcement of, singular design principles within the land use – building and land use – effects provisions is unlikely to result in the most efficient outcome for the use and development of land within the Nau Mai Business Park that would otherwise respond to environmental or site-specific challenges to promote or enable innovative design under</p>

<p>- Industrial Zone</p> <p>An activity Status table that enables specific land use activities in the Nau Mai Business Park.</p> <p>- Activity Status Table 20.5.2</p> <p>Performance Standards that manage the effects of industrial land use:</p> <p>- Land Use – Effects 20.5.6 -20.5.14</p> <p>Performance Standards that manage the bulk and location of buildings:</p> <p>- Land Use – Building 20.5.11-20.5.15</p> <p>Subdivision standards consistent with the Industrial Zone</p> <p>- 20.4 Subdivision</p>		flexible provisions.
	<p>Economic:</p> <ul style="list-style-type: none"> - The policies in relation to the Nau Mai Business Park do not specifically provide for the further growth of the Business Park as it is a restrictive identified area. However, development is generally more permissive than under the land use and subdivision standards for the Industrial Zone. - The establishment of the Nau Mai Business Park has economic benefits to the people in the surrounding area in respect to their 	<p>Economic:</p> <ul style="list-style-type: none"> - Enforcement of restricted development regulations creates compliance costs.

	<p>ability to access these activities which would not otherwise be easily available to them.</p> <ul style="list-style-type: none"> - Employment opportunities are made available. 	
	<p>Social:</p> <ul style="list-style-type: none"> - The management of industrial development within the Nau Mai Business park and enforcement of provisions relating to design controls, in particular within areas where industrial development adjoins sensitive land uses, will protect the overall health and wellbeing of people and enhances the visual amenity of industrial areas when viewed from public spaces. 	<p>Social:</p> <ul style="list-style-type: none"> - The location of the Nau Mai Business Park may have some social and amenity effects on surrounding neighbours.
	<p>Cultural:</p> <ul style="list-style-type: none"> - There are not considered to be any significant cultural benefits as a result of these provisions. 	<p>Cultural:</p> <ul style="list-style-type: none"> - There are not considered to be any significant cultural costs as a result of these provisions.

Opportunities for economic growth and employment

While it does not specifically provide for economic growth and employment, the suite of policies and specific provisions for the Nau Mai Business Park recognises that the development of this location needs to be managed and provided for. This represents an opportunity for economic growth and employment on the outskirts of Raglan.

Options less or not as appropriate to achieve the objective

Option I: Manage the Nau Mai Business Park through the general industrial zone provisions.

Appropriateness:

This would create consistency between the Nau Mai Business Park and the remainder of the Industrial Zone. However, it does not recognise the recent amendments to the Operative District Plan to formalise the Business Park. It is considered appropriate to continue to manage the Nau Mai Business Park through

similar provisions, providing certainty of outcome for land owners and the community.

Risk of acting or not acting

Uncertainty or insufficiency of information:

It is considered that the effects of the Nau Mai Business Park are sufficiently understood to continue to use the existing framework for its ongoing management. This suite of provisions has recently been tested through the Schedule 1 process.

Risk of acting or not acting:

There are minimal risks associated with implementing provisions relating to the Nau Mai Business Park as it is already established and provided for in the OWDP

Efficiency and effectiveness

Using the existing provisions of the operative district plan to continue to manage the Nau Mai Business Park will ensure efficiency as the provisions are already understood and being used. The provisions will manage this business park in a manner that achieves the aim of the objective which is to ensure industrial activities do not adversely affect surrounding activities and ecosystems.

6 CONCLUSION

After undertaking an evaluation as required by section 32 of the RMA, the objectives are considered the most appropriate way to achieve the purpose of the RMA (Section 5) to allow industrial activities in the Waikato District.

It is considered that the recommended policies and methods are the most appropriate way for achieving the objectives, having considered:

- (i) other reasonably practicable options for achieving the objectives; and
- (ii) assessing the efficiency and effectiveness of the provisions in achieving the objectives.

APPENDIX I PROVISION CASCADE

Issue to be addressed	Objective	Policies	Rules
Provide for the growth and management of all industrial activities in the Waikato District.	4.6.1 Objective – Economic Growth of Industry	4.6.2 Policy – Provide Industrial Zones with Different Functions 4.6.3 Policy – Maintain a Sufficient Supply of Industrial Land 4.6.4 Policy – Maintain Industrial Land for Industrial Purposes	Zone: Industrial 20.1 Land Use Activities 20.4 Subdivision Zone: Heavy Industrial 21.1 Land Use Activities 21.4 Subdivision
Manage the potential effects of industrial land use on the surrounding environment.	4.6.6 Objective – Manage Adverse Effects	4.6.7 Policy – Management of Adverse Effects within Industrial Zones	Zone: Industrial 20.2 Land Use Effects 20.3 Land Use Building 20.4 Subdivision Zone: Heavy Industrial 21.2 Land Use Effects 21.3 Land Use Building 21.4 Subdivision
Provide for and manage existing industrial uses that are outside of urban areas	4.6.1 Objective – Economic Growth of Industry	4.6.5 Policy - Provide for and manage existing industrial uses that are outside of urban areas	Zone: Industrial 20.1 Land Use Activities 20.4 Subdivision Zone: Heavy Industrial 21.1 Land Use Activities 21.4 Subdivision
Manage the development and growth of the Nau Mai Business Park	4.6.6 Objective – Manage Adverse Effects	4.6.8 Policy – Specific activities within Nau Mai Business Park 4.6.9 Policy - Management of Adverse Effects within Nau Mai Business Park	20.5 Nau Mai Business Park

APPENDIX 2 TUAKAU STRUCTURE PLAN