

# Waikato District Plan

## Proposed Plan Change 22 Builtsmart Limited Private Plan Change

### S42A Planning Report on Submissions

March 2020



Waikato District Council  
15 Galileo Street  
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Notice of Hearing  
Waikato District Council

NOTICE is hereby given that a hearing will be held in the Riverside Rooms, Huntly Service Centre, Main Street, Huntly on 5 MARCH 2020 at 9.30 am. The purpose of the Hearing is to hear submissions and further submissions on Proposed Plan Change 22 Private Plan Change by Builtsmart Limited

This notice is given under section 46 of the Local Government Official Information and Meetings Act 1987.

GJ Ion  
CHIEF EXECUTIVE

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# 1 Introduction

This report is prepared in accordance with section 42A of the Resource Management Act 1991 (RMA).

## 2 Summary of Plan Change

Waikato District Plan	Waikato Section of Waikato District Plan
Status of Document	Operative 5 <sup>th</sup> April 2013
Name of Plan Change	Plan Change 22 - Builtsmart Limited Private Plan Change
Date of notification	23 October 2019
Number of submissions received	5
Date summary of submissions notified	4 December 2019
Number of further submissions received	0
Main issues emerging from submissions	<ul style="list-style-type: none"> <li>• Support plan change provided transport issues are appropriately addressed</li> <li>• Support plan change as it ensures lower residual risk from natural hazards.</li> <li>• Positive economic benefits &amp; addresses negative effects on neighbours</li> <li>• Potential for dust nuisance</li> <li>• Access for operational traffic</li> <li>• Property values adversely affected</li> </ul>

## 3 Hearing Report

### 3.1 Purpose of the Plan Change

Builtsmart Property Partnership (BPP) has applied to the Waikato District Council to rezone an area of land on the southern edge of Huntly from Living Zone to Light Industrial Zone. The proposed plan change covers an area of 2.45 hectares located between the current State Highway One and the Waikato River and adjacent to 496 Great South Road where Builtsmart is currently located.

BPP have been constructing prefabricated affordable transportable houses on its site at 496 Great South Road for approximately 35 years. Due to the demand for these houses and the fact that the current BPP site cannot accommodate the growth required to meet that demand, BPP have either purchased (or agreed to lease) land immediately adjacent and to the north of its current operation to expand its business activities.

The current BPP operation is located on land that is zoned Industrial, while the land onto which BPP wish to expand is zoned Living Zone. The Operative Waikato District Plan Living Zone rules contained in Section 21.5 states that an Industrial activity is prohibited in the Living Zone, meaning that an application cannot even be lodged with Council. On this basis, BPP has lodged its application for a private plan change to alter the zoning to Light Industrial and authorise the expansion of its prefabricated house building operation onto the plan change area.



The private plan change applies to 5 properties located between the current BPP site, State Highway 1 (Great South Road), the Waikato River and Jackson Road. BPP have requested that the Operative Waikato District Plan Light Industrial Zone provisions be applied to the plan change area along with some site-specific provisions relating to noise levels, setbacks from the adjacent Living Zone boundary and a definition of the Builtsmart Expansion Area.

### 3.2 Submissions and late submissions

PC22 was publicly notified on 23 October 2019, with a closing date for submissions of 21 November 2019. The summary of submissions was publicly notified on 4 December 2019. The period for further submissions closed on 18 December 2019.

There were 5 original submissions received. No further submissions were received.

The names of all submitters are listed in Appendix 5. The submissions are currently available on Council's website and copies will be available at the hearing.

### 3.3 Statutory requirements (including Section 32)

BPP provided a s32 analysis at the time of notification of PC22. The Section 32 evaluation forms an integral part of the decision making, including the hearing process, and this report is a further extension of the Section 32 process.

The relevant statutory tests when assessing the merits of the provisions of a plan change are found in sections 31, 32, 72, 74, 75 and 76 of the RMA. These tests have been summarised by the Environment Court in decisions such as *Long Bay-Okura Great Park Society Incorporated v North Shore City Council*<sup>1</sup>.

Given that the District Plan objectives and policies are operative, and are not subject to PC22, the relevant requirements are whether the provisions of PC22:

- a) have regard to the actual and potential effect of activities on the environment (in relation to rules) under s76;
- b) give effect to the Waikato Raupatu Claims (Waikato River) Settlement Act 2010 and the Waikato Regional Policy Statement as required by s75(3);
- c) have regard to the Future Proof Implementation Strategy, Waikato District Development Strategy, Waikato District Long Term Plan and the Regional Land Transport Plan as required by s74(2)(b);
- d) implement the policies and therefore the objectives of the District Plan in accordance with s32;
- e) are the most appropriate method for achieving the objectives of the District Plan, having regard to their efficiency and effectiveness (taking into account the benefits and costs, the opportunities for economic and employment growth, and the risk of acting or not acting if there is uncertain or insufficient information);
- f) have been designed to accord with and assist the Council to carry out its functions under Section 31 so as to achieve the purpose of the RMA; and
- g) are in accordance with the provisions of Part 2 of the RMA (which covers the purpose of the act; matters of national importance; matters that must be given particular regard and taking account of Treaty of Waitangi principles).

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<sup>1</sup>EnvC Auckland A078/08, 16 July 2009 at [34]

This report addresses each of the above.

### 3.4 Decision Making

When making its decision, the Council is required, under clause 10 of the First Schedule of the RMA to give reasons for accepting or rejecting any submissions. The Decision of the Council may also include consequential amendments arising out of submissions and any other matters the Council considers relevant and within the scope of aspects raised in submissions.

### 3.5 Background to the plan change

BPP formally lodged the initial plan change request with Waikato District Council on 9 September 2019. The plan change request seeks to amend the zoning of 2.45 hectares of land to the north of the existing Huntly township from 'Living Zone' to Operative District Plan Light Industrial Zone with some bespoke provisions addressing specific noise, yard setback and site referencing issues.

After requests for further information were addressed, the plan change was notified on 23 October 2019.

### 3.6 Other relevant documents

#### 3.6.1 Vision and Strategy under the Waikato Raupatu Claims (Waikato River) Settlement Act 2010.

The Waikato Raupatu Claims (Waikato River) Settlement Act 2010 ('The Settlement Act') gives effect to the 2009 Deed of Settlement in respect of the Raupatu claims over the Waikato-Tainui area. This legislation also records that the Waikato River and its contribution to New Zealand's cultural, social, environmental and economic wellbeing is of national importance. The overarching purpose of the Settlement Act is to restore and protect the health and well-being of the Waikato River for future generations and provides for the establishment of a Vision and Strategy for the Waikato River and co-governance and co management arrangements to achieve the overarching purpose of the Settlement Act.

The proposed plan change is within the Waikato River Catchment and is therefore subject to the 'Vision and Strategy'. BPP have consulted with tangata whenua throughout the development of the plan change and specifically consulted with representatives of Waikato Tainui and the Waahi Whaanui Trust. As outlined in the plan change report, general support was provided by both Waikato Tainui and the Waahi Whaanui Trust.

The Vision and Strategy for the Waikato River is set out in the schedules to the Waikato-Tainui Raupatu Claims Settlement Act 2010, the Ngati Tuwharetoa, Raukawa and Te Arawa River Iwi Waikato River Act 2010 and the Nga Wai o Maniapoto (Waipa River) Act 2012. As stated in the Waikato Regional Policy Statement (WRPS): "the Vision and Strategy is the primary direction-setting document for the Waikato and Waipa Rivers and their catchments." Under the Acts listed above, the Vision and Strategy is deemed, in its entirety, to be part of the Regional Policy Statement and the RPS cannot be inconsistent with the Vision and Strategy. In the event of any inconsistency, the Vision and Strategy prevails.

Section 2.5.2 of the WRPS sets out the Objectives for the Waikato River which include the overarching provision for the restoration and protection of the health and wellbeing of the Waikato River and the relationships of Waikato River iwi and the communities of the Waikato

Region with the river. Other objectives set out the importance of an integrated and holistic approach to managing the rivers' resources, adopting a precautionary approach towards decisions that may result in adverse effects on the river and the protection of significant sites, fisheries, flora and fauna. Improving the water quality within the river along with promoting improved access to it for recreation, sporting and cultural opportunities is also contained in the Objectives.

It is considered that the BPP proposal is generally consistent with the Vision and Strategy as set out in section 2.5.2 of the WRPS for the following reasons:

- a) The proposal will ensure that the development earthworks and subsequent activities on the site will be carefully managed so as to avoid construction stage stormwater and operational stormwater discharging directly into the adjacent Waikato River. This will ensure that the health and wellbeing of the Waikato River is not adversely affected.
- b) The proposed activity will be physically set back from the adjacent residential neighbours to the north ensuring that their amenity will not be adversely affected.
- c) The resource consents that will be lodged subsequent to the plan change will have conditions requiring accidental discovery protocols to be followed in the event of any unknown archaeological sites to be discovered during earthworks activities.
- d) The site layout has been designed to ensure that the overall flood balance is retained and the Huntly South Ponding area is not adversely affected by the filling of the site required for the Builtsmart activity to commence.

Waikato-Tainui have been consulted and were provided with a copy of the draft plan change. Feedback provided by Waikato Tainui was incorporated into the plan change. The Waahi Whaanui Trust were also consulted during the development of the proposed plan change and their feedback was also included in the plan change.

### 3.6.2 Waikato Regional Policy Statement (RPS)

The Waikato Regional Policy Statement was made operative on 20 May 2016. Waikato District Council is required to give effect to an operative regional policy statement. The WRPS provides an overview of the resource management issues of the region and establishes policies and methods to achieve integrated management of the region's natural and physical resources. The following chapters are considered relevant to the proposed plan change:

- Section 2 includes the Vision and Strategy for the Waikato River. This has been addressed above.
- Section 6 of the WRPS addresses the Built Environment. This includes the allocation and staging of Industrial growth throughout the region – adopting the Future Proof Sub Regional Growth Strategy.
- Section 8 addresses Fresh Water Bodies and the integrated management of catchments including the effects of subdivision, use and development. This is of relevance due to the BPP site being adjacent to the Waikato River.
- Section 10 addresses Heritage.
- Section 12 – Landscape, natural character and amenity
- Section 13 addresses natural hazards which includes flooding. This is relevant due to the topography of the plan change area and its location with respect to the Huntly South Ponding Area in the Operative Waikato District Plan.

These are addressed in detail below.

## Section 6: Built Environment

Policy 6.1 requires subdivision and development to have regard to the development principles in section 6A, recognise and address potential cumulative effects of subdivision, land use and development, based on sufficient information to understand the potential long-term effects of subdivision and have regard to the existing built environment.

The WRPS identifies that these principles are not absolutes, however need to be considered when managing the built environment. It is considered that the proposed plan change generally meets those principles. The BPP site is located within the existing Huntly urban area and seeks to amend the BPP expansion area from Living Zone to Light Industrial Zone. The plan change does not involve an extension of the Huntly urban area nor does it require any extension of infrastructural services. The development principles of 6A have been assessed by the applicant in the plan change report, however a separate high-level assessment has been carried out below.

Assessment of Schedule 6A		
a)	support existing urban areas in preference to creating new ones;	The proposed BPP plan change area is located within the existing Huntly urban area. The rezoning seeks to alter an area of Living Zone to Light Industrial Zone and is located adjacent to the existing BPP operational base on Great South Road.
b)	occur in a manner that provides clear delineation between urban areas and rural areas;	Complies and the plan change area is located within the existing Huntly urban area.
c)	make use of opportunities for urban intensification and redevelopment to minimise the need for urban development in greenfield areas;	Complies. The plan change is intensifying the landuse potential of an area of Living Zone land within the Huntly urban area by rezoning it to Light Industrial. The change is zone will also reduce the sensitivity of the landuse to potential flooding events.
d)	not compromise the safe, efficient and effective operation and use of existing and planned infrastructure, including transport infrastructure, and should allow for future infrastructure needs, including maintenance and upgrading, where these can be anticipated;	The BPP proposal will result in a small increase in vehicular traffic onto Great South Road, however the technical traffic assessment confirms that with the construction of a compliant access from the expansion area directly onto Great South Road any adverse effects of the proposal will be appropriately addressed. In addition, Great South Road will shortly revert to a local road under the control of the Waikato District Council given that the Huntly Section of the Waikato Expressway will be opening to the public in mid-February 2020.
e)	connect well with existing and planned development and infrastructure;	The BPP proposal will connect well to the existing Great South Road and is already in an area serviced for water, wastewater and stormwater.
f)	identify water requirements necessary to support development and ensure the availability of the volumes required;	The applicant has provided confirmation that reticulated water supply is available for the BPP proposal.
g)	be planned and designed to achieve the efficient use of water;	It is expected that the BPP proposal will use water efficiently.

h)	be directed away from identified significant mineral resources and their access routes, natural hazard areas, energy and transmission corridors, locations identified as likely renewable energy generation sites and their associated energy resources, regionally significant industry, high class soils, and primary production activities on those high-class soils;	The BPP proposal will not compromise any of these matters given that it is located within the existing Huntly urban area.
i)	promote compact urban form, design and location to: i) minimise energy and carbon use; ii) minimise the need for private motor vehicle use; iii) maximise opportunities to support and take advantage of public transport in particular by encouraging employment activities in locations that are or can in the future be served efficiently by public transport; iv) encourage walking, cycling and multi-modal transport connections; and v) maximise opportunities for people to live, work and play within their local area;	The BPP proposal will provide for a more intensive urban form in that it will enable Light Industrial landuse to develop in an area that is currently zoned for Living zone. It will also promote additional local employment which will improve the ability for people from Huntly to live, work and play in their local area.
j)	maintain or enhance landscape values and provide for the protection of historic and cultural heritage;	The BPP proposal will be located within the existing Huntly urban area and adjacent to an area of existing industrial activity and next to Great South Road. There are no known historic features on the site and an accidental discovery protocol will be added as a condition of the future consents to ensure that this issue is also addressed. Landscape values will not be compromised.
k)	promote positive indigenous biodiversity outcomes and protect significant indigenous vegetation and significant habitats of indigenous fauna. Development which can enhance ecological integrity, such as by improving the maintenance, enhancement or development of ecological corridors, should be encouraged;	The BPP site does not contain significant indigenous vegetation.
l)	maintain and enhance public access to and along the coastal marine area, lakes, and rivers;	The BPP proposal will not preclude access to the Waikato River.
m)	avoid as far as practicable adverse effects on natural hydrological characteristics and processes (including aquifer recharge and	The BPP site is located within the Huntly South Assessment Area. This area has been identified as a flood risk area with the important function of mitigating the adverse effects of floods by holding

	flooding patterns), soil stability, water quality and aquatic ecosystems including through methods such as low impact urban design and development (LIUDD);	water temporarily during and after flood events. The available flood storage in the Huntly South Assessment Area has been significantly reduced over time due to historic filling. The applicant has demonstrated the manner in which the overall flood storage balance will be maintained on site following the completion of the site expansion. Stormwater off the site will be managed according to appropriate standards.
n)	adopt sustainable design technologies, such as the incorporation of energy efficient (including passive solar) design, low-energy street lighting, rain gardens, renewable energy technologies, rainwater harvesting and grey water recycling techniques where appropriate;	It is anticipated that the proposal will be consistent with this provision.
o)	not result in incompatible adjacent land uses (including those that may result in reverse sensitivity effects), such as industry, rural activities and existing or planned infrastructure;	<p>Potential reverse sensitivity effects associated with the BPP activity relate to the adjacent residential landowners immediately north of the site. These reverse sensitivity effects would likely comprise dust and noise during construction earthworks and noise and traffic arising from the operational activity. The applicant has demonstrated the manner in which dust and noise during construction will be managed in accordance with the controls contained in a construction management plan condition imposed on the future resource consent.</p> <p>Operational noise will be managed by a combination of a site layout that retains a 25-30 metre setback between the nearest residential neighbours and the Builtsmart activities and the adoption of the Proposed District Plan noise limits instead of the Operative District Plan noise limits. This would see a daytime noise limit of 50 dBA (L10) from 7.00 am to 7.00 pm and then 45 dBA (L10) from 7.00 to 10.00 pm Monday to Saturday. At all other times including public holidays, the limit would be 40 dBA (L10) and 65 dBA (Lmax). This combination of setback and noise limits will ensure that the adjacent residential landowners are protected from adverse noise effects.</p>
p)	be appropriate with respect to projected effects of climate change and be designed to allow adaptation to these changes;	The BPP proposal is located on land that is flood prone and located within the Huntly South Assessment Area. However, the applicant has provided sufficient technical information to confirm that the flood storage available within the Huntly South Assessment Area will not be reduced.

q)	consider effects on the unique tāngata whenua relationships, values, aspirations, roles and responsibilities with respect to an area. Where appropriate, opportunities to visually recognise tāngata whenua connections within an area should be considered;	The BPP proposal has been extensively discussed with local iwi, the Waahi Whaanui Trust and Waikato Tainui. Both groups have supported the plan change process.
r)	support the Vision and Strategy for the Waikato River in the Waikato River catchment;	It is considered that the BPP proposal will support the Vision and Strategy for the Waikato River catchment.
s)	encourage waste minimisation and efficient use of resources (such as through resource-efficient design and construction methods); and	It is anticipated that the BPP proposal will be consistent with this proposal in that the proposal will enable the expansion of a resource efficient method of house construction to produce a greater number of affordable houses.
t)	recognise and maintain or enhance ecosystem services.	The BPP proposal has considered stormwater management, localised flooding and ground conditions in developing the site concept.

As per the above comments, it is considered that the proposed plan change is broadly aligned with the principles of 6A.

Policy 6.1 b) requires development to recognise and address potential cumulative effects of subdivision and development. The plan change area is located within the existing Huntly urban area but the change of zoning will intensify the development level within the site. Cumulative effects can be expected to include increased stormwater flows, increased traffic and noise arising from activities on the site itself. The combination of the Operative District Plan Industrial provisions plus the bespoke noise and setback rules will address the potential for noise and reverse sensitivity issues. Stormwater flows will be addressed through conditions of consent imposed at the time of processing the consent applications that will follow this plan change process.

Policy 6.1 c) requires sufficient information to have been provided to understand the potential long-term effects of subdivision, use and development. Implementation method 6.1.8 provides an outline of the level of information expected for the proposed rezoning. These are addressed below.

Assessment of 6.1.8 Information to support new urban development and subdivision		
Information		Comment
a)	the type and location of land uses (including residential, industrial, commercial and recreational land uses, and community facilities where these can be anticipated) that will be permitted or provided for, and the density, staging and trigger requirements;	Information related to land use is included. The proposal will not be staged and will be developed as a single package of works.
b)	the location, type, scale, funding and staging of infrastructure required to service the area;	The application contains information relating to the infrastructure needs of the BPP proposal.

c)	multi-modal transport links and connectivity, both within the area of new urban development, and to neighbouring areas and existing transport infrastructure; and how the safe and efficient functioning of existing and planned transport and other regionally significant infrastructure will be protected and enhanced;	Transportation has been addressed within the plan change documentation. All traffic accessing the expansion area will utilise a new entrance directly off Great South Road and no traffic will utilise Jackson Road. The proposed entranced design and location has the support of NZTA as the managers of the current Great South Road.
d)	how existing values, and valued features of the area (including amenity, landscape, natural character, ecological and heritage values, water bodies, high class soils and significant view catchments) will be managed;	The change from Living Zone to Light Industrial Zone is not expected to adversely impact the values of the area, given the proximity to Great South Road, the railway line and Huntly Quarry located directly across the road to the East. The site has already been compromised with the development of several houses and will be subject to additional intensification.
e)	potential natural hazards and how the related risks will be managed;	The site is adjacent to the Waikato River and is located within the Huntly South Assessment Area for flood ponding. The applicant has demonstrated the manner in which the flood storage volumes will not be reduced but will be maintained with the development of a large pond across the northern and eastern flanks of the site.
f)	potential issues arising from the storage, use, disposal and transport of hazardous substances in the area and any contaminated sites and describes how related risks will be managed;	The site was previously used for residential activities. The NES for Contaminated Soil will apply during the consenting process.
g)	how stormwater will be managed having regard to a total catchment management approach and low impact design methods;	BPP have provided a conceptual Stormwater Management Plan that sets out the manner in which stormwater will be managed across the site and this has been reviewed as acceptable by Council staff.
h)	any significant mineral resources (as identified through Method 6.8.1) in the area and any provisions (such as development staging) to allow their extraction where appropriate;	There are no significant natural mineral resources within the BPP site.
i)	how the relationship of tāngata whenua and their culture and traditions with their ancestral lands, water, sites, wāhi tapu, and other taonga has been recognised and provided for;	Tangata Whenua have been consulted as part of the plan change process. They have provided support for the plan change.
j)	anticipated water requirements necessary to support development and ensure the availability of volumes	The applicant has consulted with Council engineering staff who have confirmed that



	required, which may include identifying the available sources of water for water supply;	there is sufficient water available for the needs of the proposed expanded activity.
k)	how the design will achieve the efficient use of water;	The development is likely to be consistent with this provision through the use of low flow fixtures in the buildings that will be constructed on site.
l)	how any locations identified as likely renewable energy generation sites will be managed;	There are no renewable energy sites identified.
m)	the location of existing and planned renewable energy generation and consider how these areas and existing and planned urban development will be managed in relation to one another; and	There are no existing or planned renewable energy sites.
n)	the location of any existing or planned electricity transmission network or national grid corridor and how development will be managed in relation to that network or corridor, including how sensitive activities will be avoided in the national grid corridor.	The site is not affected by the national grid corridor.

Policy 6.1d) the proposed plan change represents a change from the existing environment in that the plan change is currently covered with some residential houses and is proposed for light industrial activities. However, the change is not significant in that the immediate locality is already characterised by the existing Builtsmart site to the south and Great South Road and the Railway and Huntly Quarry site to the east. This means that in terms of existing amenity levels, the locality already experiences elevated noise and traffic levels and is surrounded by industrial type activities.

With regard to reverse sensitivity, the applicant has acknowledged the presence of residential neighbours immediately to the north of the proposed expansion site. However, the combination of a specific 25 metre setback and a bespoke noise rule applied through the plan change proposed provisions will address this issue.

Policy 6.3 relates to the co-ordination of growth and infrastructure. It directs the nature, timing and sequencing of new development to be co-ordinated with the development funding and implementation of transport and other infrastructure. This includes ensuring new development doesn't occur until provision for appropriate infrastructure necessary to service the development is in place.

Specialist reports have been prepared by BPP to address the level of infrastructure required by the development. The area is already serviced for water, wastewater and stormwater and there is sufficient capacity in Council's Three waters system to accommodate the proposed plan change activities. This was confirmed by Council staff in a letter included in Appendix F of the Plan Change application.

Policy 6.5 Energy Demand Management directs development to minimise transport, energy demand and waste production. The location of the BPP Plan Change area within the existing Huntly Urban area means that the site will be well placed to minimise additional transport and energy demand factors.

Policy 6.14 addresses the adoption of the future proof land use pattern. As per 6.14a) urban development in Huntly is required to occur within the indicative urban limits shown on Map 6.2 (section 6C). Given that the BPP site is located entirely within the existing Huntly Urban limits as shown on Map 6.2, the proposed plan change will be consistent with this Policy. This also means that there is no requirement to review the proposed plan change for consistency against the alternative land release patterns contained in Policy 6.14.

## 8 Fresh Water Bodies

Section 8 of the WRPS deals with Fresh Water Bodies of which the Waikato River, adjacent to the BPP proposal site, is one. The approach taken through the plan change is to locate the proposed light industrial activities approximately 80 metres from the Waikato River, ensure that the activities are consistent with those adjacent thus retaining the existing amenity of this portion of the river. There will be no additional point source discharge of stormwater to the river and any stormwater discharged from the site will be appropriately slowed and treated through the proposed stormwater management system.

It is considered that the BPP proposal will be consistent with the policy direction contained in Section 8.

## Section 10 – Heritage

Policies 10.1, 10.2 and 10.3 relate to heritage matters. While there are no recorded archaeological sites on the BPP site, the consent applications that follow this plan change will require the imposition of accidental discovery protocols to be implemented. Policy 10.2 also specifically relates to the relationship of tangata whenua with their ancestral lands, water, sites, waahi tapu and other taonga. The applicant has provided evidence of proactive engagement with local tangata whenua and they have provided their support for the plan change process.

On this basis, it is considered that the BPP proposal will be consistent with the policy direction contained in section 10 of the RPS.

## Section 12 – Landscape, natural character and amenity

This section of the WRPS deals with Landscape, natural character and amenity and seeks to protect the identified values and characteristics of outstanding natural features of regional or district significance from adverse effects arising from inappropriate development. While there are no outstanding natural landscapes directly associated with the BPP proposal and the site itself has been highly modified by development over time, the proximity of the site to the adjacent Waikato River is an important aspect for consideration. The separation distance of the proposed BPP activity (approximately 80 metres) means that the activity will be physically and visually separated from the Waikato River. The existing character of the area will not be compromised and there will be no adverse effects on public access to the river. It is considered that the proposal will be consistent with the policy requirements of section 10 of the RPS.

## Section 13 - Natural Hazards

This section aims to ensure that natural hazard risks are managed using an integrated and holistic approach. As set out above, the BPP proposal to retain the flood storage volume required as part of the Huntly South Assessment Area through the creation of a specific stormwater detention pond which will double as a flood storage area. The Three Waters report prepared by the applicant has been peer reviewed by Constantinos Fokianos of BBO.

The conclusion of that technical peer review is that there is agreement over the proposed approach to flood management and the change of activity along with the subsequent filling will not compromise the operation of the Huntly South Assessment Area. It is considered that the BPP proposal appropriately recognises the existing risks from natural hazards and will avoid the creation of new risks while allowing the flood balance in the Huntly South Assessment Area to be retained.

### 3.6.3 Tai Tumu Tai Pari Tai Ao

Tai Tumu Tai Pari Tai Ao, the Waikato Tainui Environmental Plan (WTEP) was lodged with the Waikato District Council on 1 July 2013. BPP have proactively engaged with representatives of Waikato Tainui through the development of the plan change to ensure that it aligns with the objectives and policies of the WTEP as much as possible. The Plan Change report covers a large number of matters relative to the WTEP and I concur with the conclusions reached in the report. In summary:

- a) The plan change proposal will not adversely impact on the Waikato River given the separation of the activity from the river margin and the approach to stormwater and flood management;
- b) The resource consents that will follow this plan change will consider the issue of accidental discovery of items of significance to Maori and an accidental discovery protocol imposed by way of condition will address this matter;
- c) The change from a sensitive residential landuse to a less sensitive light industrial landuse aligns with the intent of the WTEP to not increase the risks associated with natural hazards;
- d) The proposal will address stormwater management appropriately therefore not adversely affecting freshwater resources in the vicinity (Waikato River);

In conclusion I consider that the proposal will align with the intent of the Waikato Tainui Environmental Plan.

### 3.6.4 Waikato Regional Plan (WRP)

The provisions of the WRP are primarily relevant in relation to stormwater management and filling activities which will follow the plan change as authorised by resource consent. Consents will be required under the Waikato Regional Plan and have already been lodged with Council for processing. These will be assessed on their merits and issued with appropriate conditions

### 3.6.5 Waikato District Plan (WDP)

The Waikato District Plan was declared operative in March 2013 and is of relevance to the consideration of the plan change. The BPP plan change seeks to alter the zoning of the subject site from Living Zone to Light Industrial with the adoption of the full Operative Light Industrial zoning provisions along with bespoke provisions relating to noise levels and a separation distance from the nearest residential neighbour to the north. The key objectives and policies that are of relevance to the plan change are those relating to managing growth, developing sustainable settlements, landscape and amenity values, natural character, development near water and natural hazards.

## Managing Growth & Developing Sustainable Settlements

These objectives and policies focus on the importance of development being located within existing urban settlements in an integrated manner. Development should be appropriate for the existing character of the area, able to be serviced and avoid adverse effects on regionally significant infrastructure. The location of the BPP site within the urban area of Huntly and adjacent to an existing area of light industry and the fact that it can be adequately serviced with three waters infrastructure means that it aligns well with the objectives and policies from these sections of the plan. The setback of the proposed activity from the residential sites to the north in combination with the bespoke noise limit sought as a new rule pertaining only to the BPP site will ensure that adverse effects are appropriately managed on adjacent residential neighbours. I concur that the proposal will be consistent with these objectives and policies.

## Landscape and Visual Amenity Values, Natural Character and Subdivision near Water

These objectives and policies focus on the importance of avoiding or remedying adverse effects on amenity and natural character. The BPP site is located approximately 80 metres back from the Waikato River and the resultant activity will not adversely affect the values and characteristics associated with the River. The amenity of the locality is already largely set by the existing Builtsmart activities immediately to the south of the plan change area, the State Highway and the nearby Huntly Quarry. The additional plan change area will alter the amenity but not in an inappropriate manner. The expanded activity will be consistent with the current amenity and activity occurring in the area. In my view the proposal will be consistent with these objectives and policies.

## Natural Hazards, Health, Safety and Property

These objectives and policies are key in the assessment of this plan change given the location of the site within the Huntly South Assessment Area, an area of known flood hazard.

- Objective 5.2.1: "Risks from natural hazards to health, safety and property, resulting from use, development or protection of land, are minimised".
- Policy 5.2.2: "Use or development of land subject to significant natural hazards should be avoided"
- Policy 5.2.2A: "Use or development of other land subject to natural hazards should be required to mitigate the related risks to health, safety and property."

The plan change area is currently zoned as Living Zone and has a number of residential dwellings located on it. The proposed activity following the rezoning to Light Industrial consists of developing a flood ponding area that will double as a stormwater treatment pond, constructing buildings that are designed in a flood resilient manner and setting aside large areas of the site to be free of buildings.

The proposed Light Industrial zone and resultant activity is an appropriate response to the natural hazard from flooding that exists on the site by managing the risk associated with that hazard. The risks from flooding associated with residential dwellings that are inhabited 24 hours per day, 7 days per week are higher than the risks associated with flooding associated with flood resilient designed industrial buildings that are occupied only during working hours and in a managed way. The provision of a flood ponding area sufficient to retain the existing flood balance along with flood resilient design of the industrial buildings will ensure that the risks to people associated with the flooding are reduced when compared with the existing residential activity. The risk to property outside the plan change area is avoided through the level for level compensation while the risk to property inside the plan change area is managed by created flood resilient buildings.

Some additional clarity around the issue of avoidance rather than mitigation is contained in section 5.3.2 “reason and explanation” where it states that: “Some development might be allowed in lower-risk areas, where the development will not worsen the effects of the hazard either on-site or off-site, and where mitigation measures will be effective to preserve health and safety.” In relation to the BPP plan change, the applicant has demonstrated that the development will lower the risk level to people and buildings on and off site and therefore appropriately manage the risk arising from the hazard that already exists.

The technical peer review of the Three Waters report prepared by Mr Constantinos Fokianos of BBO confirms that he agrees with the technical evaluation by the applicant. I am satisfied that the proposal aligns with the intent of the Objective and Policies relating to natural hazards and that the risks to people and property will be reduced from the risks that currently exist.

### 3.7 Assessment of Environmental Effects

#### Positive Effects

The applicant has provided an assessment of the positive effects along with the potential adverse effects arising from the plan change. Positive effects are agreed in that the plan change will facilitate the expansion of the existing Builtsmart activity in a manner that will enable it to undertake a five-fold increase in the production of transportable houses. This will have flow on benefits in terms of increased local employment and opportunities for local businesses. It would also enable the greater production of houses that are more affordable (given that the Builtsmart houses are able to be built in a shorter timeframe and at a lower cost than the traditional methods of house construction).

#### Access & Traffic Effects

The primary access and traffic effects associated with the plan change result from the closing of three existing accesses onto Great South Road and the formation of new heavy vehicle entrance. While there will be additional vehicle movements associated with the increased level of activity on site, these will also utilise the new entrance and there will be no Builtsmart Limited generated vehicle use of Jackson Road immediately north of the site. This will be retained for emergency use and for the use of Regional Council staff accessing the stopbanks.

Ms Kathy Tao of BBO has reviewed the Integrated Transport Assessment (ITA) prepared by Gray Matter on behalf of Builtsmart and her technical review report is included as Appendix 4. Ms Tao concurs with the conclusions of the Gray Matter report and notes the following in her technical review:

- The opening of the Waikato Expressway Huntly section will significantly reduce through traffic volumes on Great South Road therefore decrease the exposure of road users to risk;
- While there will be an increase in vehicle use (both light and heavy vehicles) of the site however this will be mitigated by the new heavy vehicle entrance and the closure of three existing entrances;
- The existing section of Great South Road outside the BPP site is sufficiently wide and has enough sight distance to accommodate the additional vehicle movements;

- Over-dimension loads (such as transportable houses) can be appropriately managed via the conditions of over-dimension permits;
- The increased parking demand can be met by the provision of additional onsite parking spaces;
- Temporary construction traffic can be managed through site traffic management plans;

Ms Tao agrees with the conclusions of the Gray Matter ITA and considers that the traffic related effects associated with the BPP plan change can be appropriately managed. A number of conditions have been recommended which could be applied to subsequent resource consents when they are processed.

Given that the requested rezoning is to Light Industrial Zone, the traffic effects need to reflect that the site could be rezoned by Builtsmart Limited and then sold to a third party as a Light Industrial zoned site. The permitted activities possible in the Light Industrial Zone are wide ranging given that Rule 24.10 states that any activity is a permitted activity that complies with all building and effects rules except for hazardous waste storage facilities, extractive industries, offices (except ancillary to an industrial use), hospitals, day care or educational facilities and retail activities (except for small food outlets). However, an estimate of the scale and type of permitted activities can be gained from Rule 24.15 which states that a permitted activity is anything with less than 250 vehicle movements. The Traffic Impact Assessment provided with the plan change states that the total trip generation for the BPP activity at full capacity is 420 vehicles per day (including 20 Heavy Vehicles). On this basis, it is my view that the traffic effects arising from the BPP activity will be well in excess of those that could be generated by a permitted activity in the Light Industrial Zone. Given that the proposed new entrance and other mitigation proposed by the applicant will be acceptable for the BPP activity, they will also be acceptable for any future permitted activities, should the site be used by another business activity.

### Infrastructure servicing and Three Waters effects

The applicant has provided a Three Waters servicing report by Te Miro Water and McCaffrey Engineering. These technical reports have been peer reviewed by Constantinos Fokianos and Eugene Vojdanský of BBO and a copy of their technical peer review report is included as Appendix 3.

In relation to both water and wastewater provision, the applicant has confirmed that sufficient capacity is provided in the existing system to supply the site with both of these services. This has also been confirmed in writing by Waikato District Council engineers. Given the increase in the amount of impervious surfaces there will be an increase in the amount of stormwater generated from the site. Stormwater will be detained in the new stormwater pond to be constructed at the northern end of the site while treatment will occur within the basin and prior to discharge at the pipe outlet.

The critical issue of flood management has been addressed in the technical reporting and a level for level flood volume compensation approach has been taken. This means that the increase in site coverage and building area on the site (both of which take up some capacity of the Huntly South Assessment Area flood area) will be compensated for by the development of the new ponding area along the northern boundary of the BPP site. This means that the

amount of overall flood capacity available in the Huntly South Assessment Area will not be reduced. The Three Waters Technical review report by BBO concurs with the approach taken regarding the provision of water, wastewater, stormwater and flood management. A number of matters of detail have also been raised in the report but these are more appropriately addressed at the time of resource consents being lodged for the development of the site. In reliance on the technical reporting of Mr Fokianos, I consider that the issues of water, wastewater, stormwater and flood management have been appropriately addressed in the plan change.

#### Noise effects

The site is located in an area which already has State Highway One (Great South Road) along with the railway and Huntly Quarry located nearby. The combination of these existing activities set an environment typified by high noise levels. Noise effects arising from the proposed BPP activity would be those expected from the construction of the site and its buildings (temporary) and then the ongoing house construction activity on site including the transportation offsite of the completed houses and the delivery of building materials. Other types of light industrial activities that could operate from the site should its ownership change in the future are wide ranging given the way in which the Operative District Plan Industrial Zone rules are written. However, an estimate of the scale and type of permitted activities can be gained from the following:

- Rule 24.15 - permitted activity is anything with less than 250 vehicle movements,
- Rule 24.42 – Any building 10 metres or less is permitted
- Rule 24.44 – up to 70% site coverage is permitted
- Rule 24.45 – any building is set back 10 metres from the road and 7.5 metres from a boundary with another zone

While BPP have proposed that all of the provisions of the Operative District Plan (Light Industrial Zone) be applied to the site, they have proposed that the Proposed District Plan Light Industrial noise limits be applied instead of the Operative District Plan noise limits. The alternative of simply applying the Operative District Plan Light Industrial noise limits would potentially mean that the adjacent residential properties to the north could be exposed to a noise change of between 5 to 10 dBA, which would be an appreciable to significant difference.

The clearest way to explain this approach is to compare the different approaches to noise limits adopted by the Operative District Plan and the Proposed District Plan (and recommended by the applicant in respect of the BPP site for the plan change):

(A) Operative District Plan Light Industrial Zone Noise Rule	(B) Proposed District Plan Light Industrial Zone Noise Rule
<ul style="list-style-type: none"> <li>• 55 dBA (L10) 7 am to 10pm</li> <li>• 40 dBA (L10) 10 pm to 7am the following day</li> <li>• 70 dBA (Lmax) 10pm to 7am the following day</li> </ul>	<ul style="list-style-type: none"> <li>• 50 dBA (L10) 7 am to 7 pm Monday to Saturday</li> <li>• 45 dBA (L10) 7 pm to 10 pm Monday to Saturday; and</li> <li>• 40 dBA (L10) and 65 dBA (Lmax) at all other times and public holidays</li> </ul>

The noise provisions in Column B set a lower noise level during the working day (7am to 7pm) of 50 dBA (L10) with a “shoulder period” during the evening period (7pm to 10pm) of 45 dBA (L10). The noise provisions through the night time (10pm to 7am) drop to a 40 dBA (L10) and a 65 dBA (Lmax). The impact of applying the Proposed District Plan noise limits is significant in that the daytime noise limit would be 5 dBA lower and the evening shoulder period would be 10 dBA lower than the Operative District Plan limits. The night time noise

limit would be the same at 40 dBA (L10) however the night time Lmax level would be 5 dBA lower. The adoption of the Proposed District Plan noise limits is a significant reduction in the noise level permitted at the boundary of the BPP site and the adjacent residential properties to the north.

In addition to the application of this bespoke noise rule, the applicant is also proposing a site specific 25 metre setback of the light industrial activities from the Living Zone boundary. In my view this combination of approaches will ensure that the noise effects arising from the industrial activity on site will be appropriately managed.

### Visual and Amenity Effects

The change to Light Industrial activities will be a change for the local residents, however BPP have purchased all of the properties directly required for the site expansion. The change to industrial zone will mean that the permitted activity standards associated with buildings will be significantly increased from 40% site coverage (Living Zone) to 70% site coverage and from 7.5 m height limit (Living Zone) to a 10 metre height limit. This will enable a significant increase in both the bulk and height of buildings able to be developed on site such that the site could be dominated by buildings as opposed to the smaller scale, lower height residential scale of buildings currently permitted in the zone.

In my view, the increase in the bulk and height of the buildings needs to be seen in context with the proposed 25 metre minimum setback offered by the applicant. This requirement will be over three times greater than the 7.5 m setback currently imposed through the Operative District Plan Light Industrial Zone provisions (Rule 24.45 (b) (i)). In addition, Rule 24.17 (b) requires that any land within 5 metres of any boundary adjoining a Living Zone is planted with indigenous species that will achieve an average height of 3 metres after 5 years and visually screen the industrial activity. While the zone change will introduce a greater bulk of buildings than would be possible under a Residential Zone, the combination of extended setback and visual screening will provide adequate mitigation to offset this change.

I have already discussed above in this report the approaches taken by BPP to address traffic, three waters and flooding and noise effects arising from the proposed activity. The combination of these approaches along with the existing amenity means that I consider the development will not be inappropriate and local amenity will not be adversely affected.

## 3.8 Options and Evaluation

The applicant via their consultants, have undertaken extensive consultation with a number of stakeholders in the preparation of this plan change. This consultation included meetings and the exchange of information with Waikato District Council, Waikato Regional Council, Waahi Whaanui Trust, Waikato Tainui, NZTA, Future Proof and Mercury Energy along with neighbouring landowners. Following the consultation with stakeholders additional information was provided as requested. Meetings and information was shared with adjacent landowners and the process and details of the plan change was explained. A total of 5 submissions were received within the submission period while no further submissions were received.

The issue being evaluated in this plan change is how to effectively enable an increase in the land available to expand the Builtsmart transportable house business. Given that this is an amending proposal under s32 (3), the s32 analysis must assess the provisions



and objectives of the amending proposal to see if it is the most appropriate way to achieve the purpose of the Act.

The applicant has provided a s32 analysis along with an analysis of the proposal against the relevant statutory documents. Section 2.11 of the BPP plan change document assesses the proposal against the relevant objectives and policies in the ODP. I have discussed this in section 3.6.5 of my report and concur with the applicant that the BPP plan change will be consistent with the relevant objectives and policies through the ODP. In particular, the recommendation of bespoke noise and yard setback provisions is appropriate to the specific circumstances of the site, the proposed activity and the surrounding landuse. This will ensure that noise and amenity levels are maintained to an appropriate level.

Given the extent of the evaluation that has been provided in the BPP, particularly with respect to the Operative District Plan Objectives and Policies, I concur with the conclusion reached by the applicant. In my view the BPP plan change is the most efficient and effective method to address the objective of expanding the Builtsmart business to build more affordable homes and create more local employment on a well serviced site within the Huntly urban area. It also provides a method of imposing bespoke planning provisions relating to noise limits and yard setbacks that address the unique aspects of the site in a manner that protects the amenity of the adjacent residential neighbours.

#### 4 Consideration of submissions and further submissions

This section contains a summary presentation of the submissions and further submissions received on PC 22. Submissions have been grouped under the proposed plan provision numbers to assist the Hearing Panel consider the submissions made and the Planning Officer's report. A summary of the submissions is included as Appendix 5 to this report and with copies of the five submissions received to the plan change. There were no further submissions received.

Sub No	Submitter	Plan Provision	S/O	Submission Summary	Recommendation	Reasoning
1	NZ Transport Agency	NA	Support with conditions	The proposed plan change is supported provided a number of specific conditions relating to entrances closing, new entrance standards, and construction and stormwater management are met.	Accept in part.	The conditions sought are appropriate for the control of traffic entering and exiting the site. However, the conditions are not appropriate for the plan change and could instead be imposed on the subsequent resource consents sought by BPP for the activity.  No changes are recommended.
2	Waikato Regional Council	NA	Support with conditions	The submitter considers the plan change appropriate because it will reduce the level of residual risk from natural hazards through a change to a less sensitive landuse. It is also consistent with the Waikato Regional Policy Statement that requires that industrial development locate within a Strategic Industrial Node. In addition, maintenance access to the Waikato River stopbank will be maintained.  The submitter also notes that the assumption that the stormwater discharge from the site will	Accept	The plan change will reduce the level of residual risk through the shift to a less sensitive land use in light industrial versus residential. The location of the activity is within the Huntly urban area.  The issues with the WDC Comprehensive Stormwater Discharge

				be authorised under the WDC Comprehensive Stormwater Discharge consent for Huntly may not be correct. This matter should be discussed further with the submitter at the time of seeking resource consent.		consent are not matters for the plan change but are relevant for consideration when the resource consents are sought by BPP.  No changes are recommended.
3	Huntly Community Board (David Whyte)	NA	Support with conditions	3.1 The submitter considers that the economic benefits flowing from the proposed plan change will be significant but notes that potential adverse effects on adjacent members of the community need to be considered in the process.	Accept.	The economic benefits have been clearly established and the manner in which the adverse effects will be addressed have also been set out in the plan change.  No changes are recommended.
		NA	Support with conditions	3.2 The submitter considers that the proposed plan change has been well thought through and incorporates changes made in consultation with local residents. These changes include the following:  a) Zone change only applies to land that is to be occupied by Builtsmart;  b) There will be no construction traffic on local roads;  c) The self-imposed setback of 25 metres between the activity and the nearest residential neighbours to the north will assist in reducing adverse effects;	Accept.	The changes stated in the submission are appropriate and incorporated into the plan change document.  No changes are recommended.

				d) The applicant has taken a careful approach to the management of stormwater and localised ponding issues.		
		NA	Support with conditions	<p>3.3 Submitter is concerned that dust arising from the on-site activities of house construction could build up over time in the river close to where the Huntly water supply intake is located. Submitter seeks the following conditions to be applied to any activity on site:</p> <p>a) Active dust extraction to minimize dust;</p> <p>b) Dust producing activities to be undercover;</p> <p>c) Any work carried out that is not undercover is to include the prompt removal of dust to avoid it getting into the stormwater system.</p>	Accept in part.	<p>The matter of dust arising from the house construction activities are a matter for the subsequent resource consents and the management of the site activities, not the plan change. The issue of dust is addressed by a combination of Waikato District Council (addressing nuisance dust) and Waikato Regional Council (addressing a discharge to air). The applicant is invited to respond to this matter further at the hearing in terms of their approach to the issue of dust management from house construction activities.</p> <p>No changes are recommended.</p>
4	Megan and William Rhyder	NA	Support with conditions	4.1 Submitter is concerned with the potential for dust from demolition and building activity on site and wants to ensure that adequate dust mitigation is in place.	Accept in part.	<p>See comments above for submission 3.3.</p> <p>No changes are recommended.</p>
		NA	Support with conditions	4.2 Submitter wishes to ensure that Jackson Road will not be opened to Great South Road	Accept in part.	The applicant has confirmed that all site activities will utilise the new entranceway

				and that no operational traffic associated with the activity utilises Jackson Road.		to be constructed on the Great South Road boundary of the plan change area and that no activities will utilise Jackson Road.
5	Carol Trevelyan	NA	Oppose	5.1 Submitter is concerned that the plan change will alter the value of her property as it was purchased for her retirement. Her property will be affected by noise and dust from the building activity on the site.	Reject.	<p>Property valuation is not a matter that can be addressed through this plan change process. The applicant has confirmed the manner in which noise arising from the activity will be managed through a combination of a bespoke noise rule and the 25 metre setback for all site activities from the northern boundary of the site (the nearest residential neighbour).</p> <p>Dust management is an operational matter and not a specific issue to be considered as part of the plan change process. Dust issues associated with activities on the site will be managed through the District Plan provisions and monitoring. However, the applicant is invited to provide additional comment on this issue at the hearing.</p>

		NA	Oppose	5.2 Concerned at the use of the accessway adjacent to her property for access to the site.	Reject	The applicant has confirmed that all building related activity will utilise the new entranceway to be constructed onto Great South Road and no traffic will use Jackson Road for access. This is a matter to be addressed through any subsequent resource consents.
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## 5 Conclusion and Recommendations

The BPP plan change seeks to change the zoning of 2.45 hectares of land from Living Zone to Light Industrial Zone to achieve the objective of expanding the existing Builtsmart business. The applicant is seeking to change the zone and impose the Operative District Plan provisions with the exception of bespoke noise and yard setback provisions to protect the amenity of the adjacent residential neighbours. The applicant has consulted widely with affected parties and stakeholders and this is reflected in the small number of submissions (five) with no further submissions. My recommendations on the submissions received are set out above.

In my view, the proposed plan change is the most appropriate method of achieving the objective. The proposal is located within the Huntly urban area on a site that is well serviced for three waters infrastructure along with frontage to Great South Road. Importantly, the proposal sets out the manner in which the flood ponding requirements of the site will be maintained so as not to affect the other properties located within the Huntly South Assessment Area.

It is recommended that the plan change and the submissions be put before the Commissioners delegated to make decisions on the submissions. Following that process and the resolution of any subsequent appeals, the plan change will then need to be sent to Council to approve subject to clause 17 (1) of Schedule 1 of the RMA.

K:\132022 Waikato District Planning Advice (III)\38 Huntly Private Plan Change\Reporting\s42A report\Final s42A report + Appendices\Builtsmart PP s42a Report (10 February 2020) FINAL.docx

# Appendix 1

## Builtsmart Site overlaid with Aerial Photograph







## Appendix 2

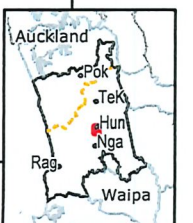
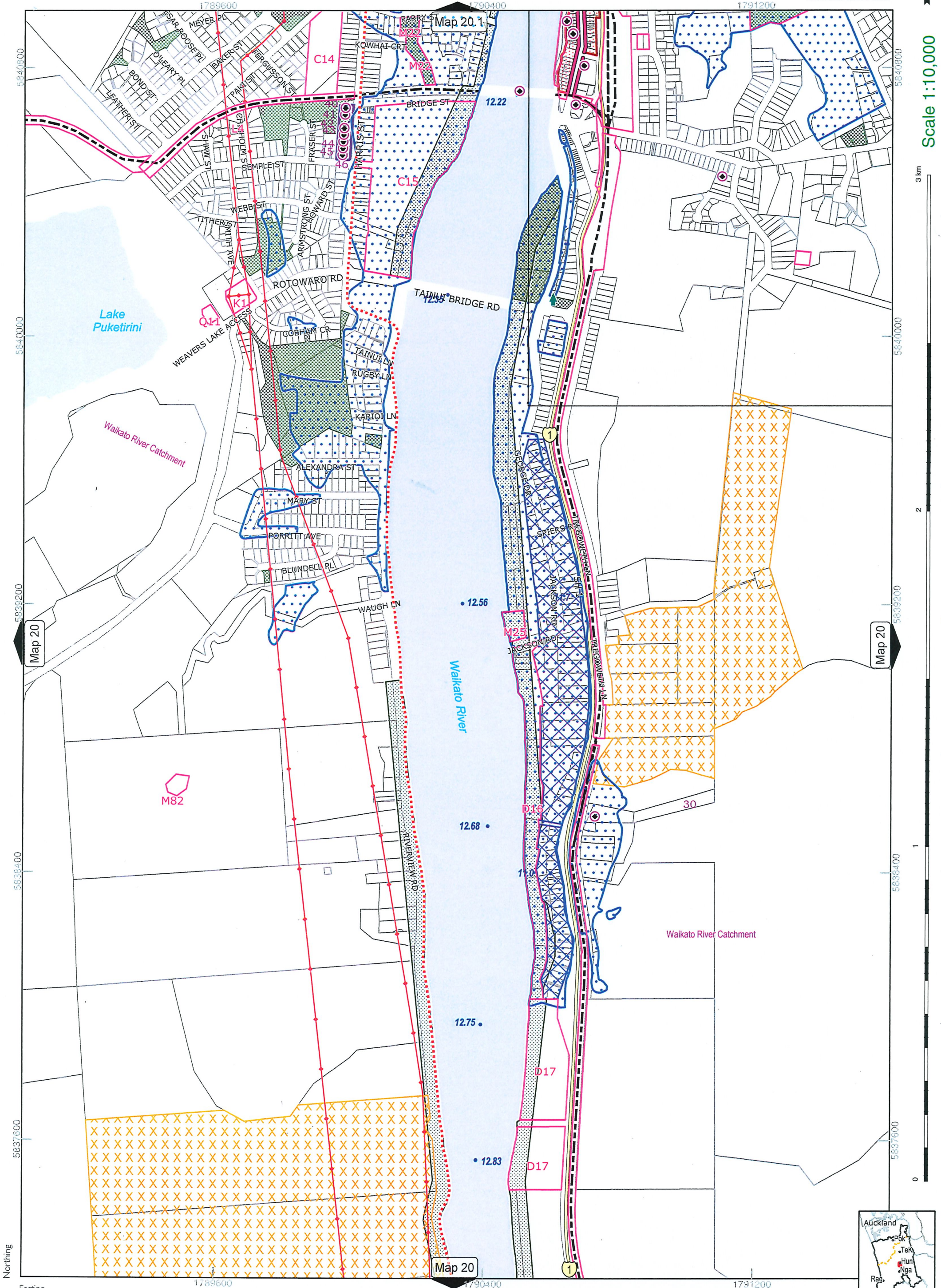
# Operative Waikato District Planning Maps



# 20.3 Huntly South



Scale 1:10,000







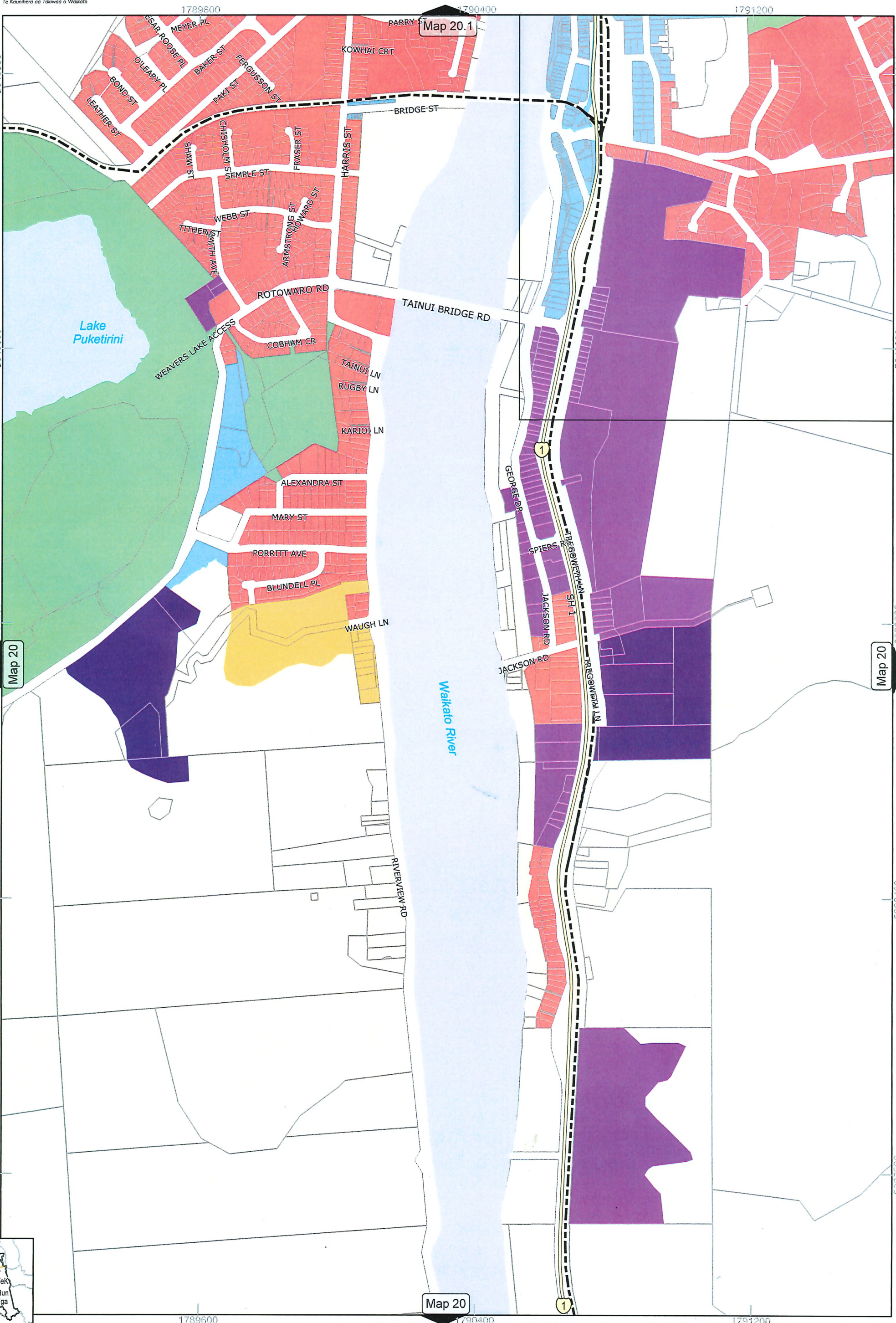
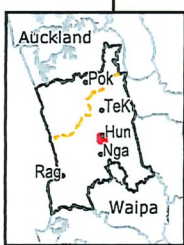
Scale 1:10,000

3 km

2

1

0



Map 20.1

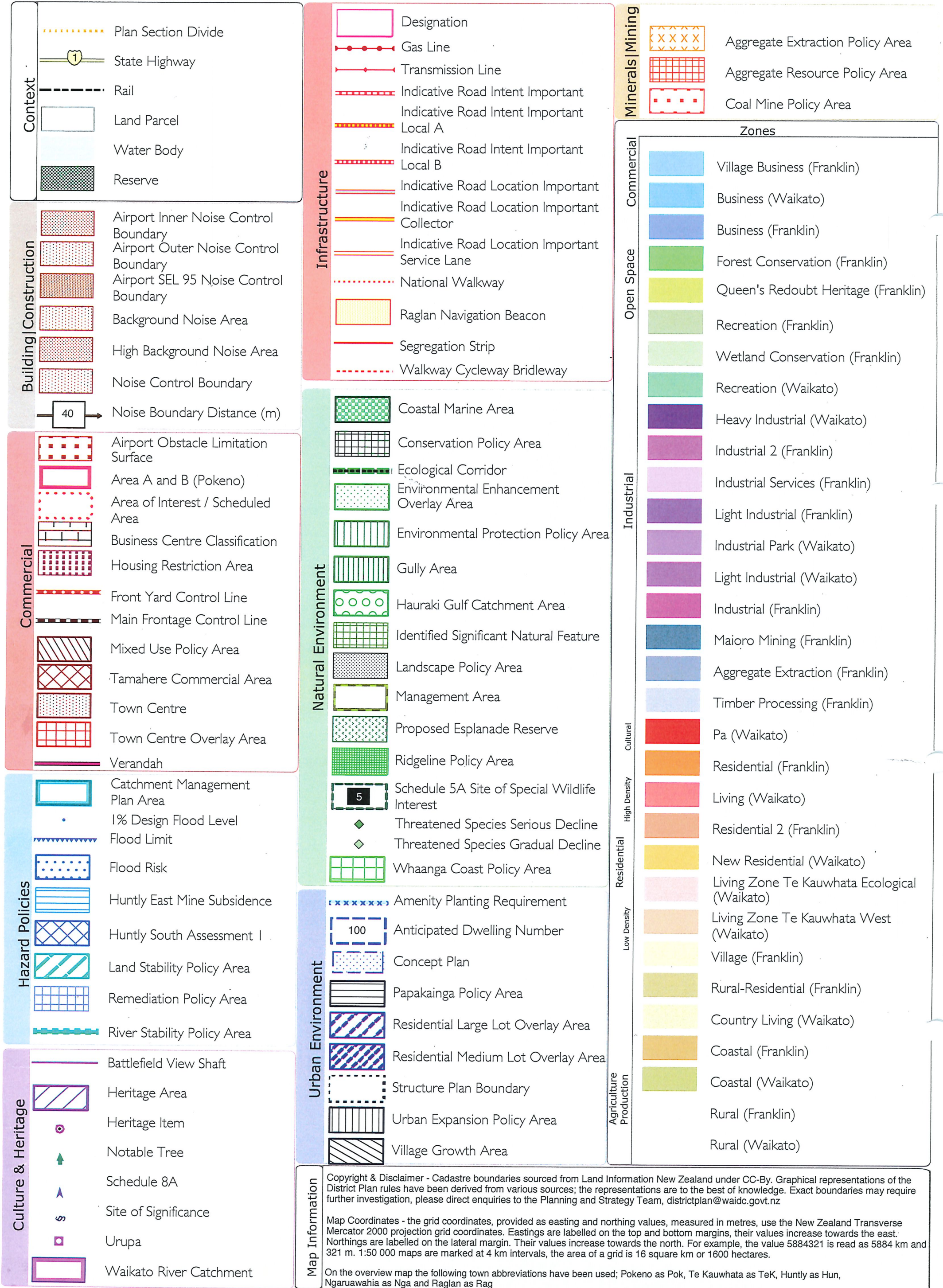
Map 20

Map 20

Map 20



# Legend





# Appendix 3

## Water Impact Assessment

### Peer Review

## MEMO

<b>TO:</b>	Chris Dawson		
<b>FROM:</b>	Constantinos Fokianos and Eugene Vodjansky		
<b>DATE:</b>	21.01.2020	<b>JOB NO.</b>	132022.38
<b>SUBJECT:</b>	<b>BuiltSmart Private Plan Change</b> <b>Water Impact Assessment Report</b> <b>Technical Peer Review</b>		

BuiltSmart Limited (BL) is proposing a Private Plan Change to the Waikato District Plan. This plan change seeks to rezone land from Living Zone to Industrial Zone to enable the expansion of the existing BuildSmart business onto an area of adjacent land to the north of the existing activity. A Three Waters assessment has been prepared by Te Miro Water to support the plan change in respect of stormwater management, flooding and potential impacts on the Lower Waikato River Flood Scheme.

BBO has been engaged to undertake a review of the 3 waters assessment report. The following documents have been reviewed:

- BuiltSmart Plan Change – Huntly, Three Waters Assessment-Draft. Prepared by Te Miro Water, June 2019.
- BuiltSmart Plan Change – Huntly, Three Waters Assessment-Final. Prepared by Te Miro Water, June 2019.

In general, we agree with the proposed approach regarding flood management. There are a few minor comments that are discussed below. Most of the comments were answered by the final report, but they are discussed in this memo in order to update the technical peer review. We also agree with the report's approach on water and wastewater and are satisfied that confirmation from the WDC Development Engineer has been provided over the capacity of the existing networks and the ability to cater for the additional flows arising from the proposed plan change.

The comments are discussed for each section separately:

### **Section 1.0 – Introduction**

The Introduction gives sufficient information on the background and the purpose of the project and the report. It also provides a brief description of the Huntly South Assessment Area and the challenges that the area faces.

Comments: There are no comments on Section 1.0

### **Section 2.0 – Existing Catchment Description**

This section provides information on the existing catchment characteristics, groundwater levels and soil properties. The information is limited due to the lack of geotechnical assessment and geological input. Although we agree with the initial assumption of soil type B for the overall catchment, we recommended that further investigation be conducted during the next stages of the detailed design to establish a better documentation for the soil characteristics. The Final report included a statement that further geotechnical and soil investigation will be undertaken in the next phase.

Comments:

- *Further investigation to be conducted in the next stages of the design to determine soil characteristics. – **Comment adopted in final report (section 2.4, page 5).***

### **Section 3.0 – Huntly South Ponding Area**

In Section 3.0 more detail is provided on the existing Huntly South ponding area and drainage scheme. The flood levels of the 10-year, 50-year and 100-year events have been derived from Huntly Management Plan in 1992. We confirm that a “water balance” approach was discussed during a meeting in order to define the 2-year level. The information given on the pump station properties is considered sufficient for the current level of detail required for the proposed rezoning.

Comments:

- *The catchment characteristics used in TP108 graphical runoff calculations (Appendix 8) should be documented with a catchment plan. Although there is a reference to Map SK-002, the map itself shows only the developments catchment and not the overall catchment. The only illustration of the overall sub-catchment is at figure 4, though its scale and size does not provide sufficient detail. More information should be provided on the way that impervious areas were measure as only 4.44% of the total catchment was considered impervious. **In the final report this comment was partially answered by the addition of a catchment map in Appendix 4. No more information on the impervious measurement was provided, though.***
- *A 2-year ARI (including climate change) flood level should be calculated to ensure that the proposed development level (11.10m) is set higher than the climate-change adjusted flood level for frequent events. **The comment was answered in the Final Report by adding the required information in table 1, page 7 (flood level RL 11.0m).***

### **Section 4.0 – Flood Risk Assessment**

Section 4.0 provides the objectives of the flood risk assessment as well as the proposed approach and solutions to mitigate that risk. It also provides with a description on how the level to level flood volume compensation is achieved through the proposed development. Finally, it discusses the need for a hazardous substance management plan to be set up during the resource consent and makes an estimate that residual risk is reducing due to changing the zoning from residential to a less vulnerable industrial activity.

Comments:

- *We agree with the proposed approach of level-to-level flood volume compensation. A larger scale contour plan should be included, though, during the detail design to demonstrate the achievement of the term. This can be addressed as part of any resource consent application. **Comment not answered, this matter is to be addressed as part of resource consent application.***



- A provision to maintain current flood flow from the northern boundary of the property should be made to make sure that the proposed design will not obstruct flooding flows coming into the proposed attenuation area. This will influence the attenuation design for intermediate storms as an offside catchment needs to be taken into consideration when sizing the control structures (weirs and/or orifice). A statement was added in the Final Report, section 4.2.1 (page 12) stating “A provision to maintain current flood flow from the northern boundary of the property should be made to make sure the design will not obstruct any flows coming from existing residential areas”.
- On drawings 19013-SK-002 and 19013-SK-006 there is a note (note 2) stating that 1% AEP FLOOD LEVEL of RLm=11.7m provided by Waikato Regional Council is yet to be confirmed. A clarification is needed if the RLm has been confirmed or not by WRC. In Final report, the comment in drawing 19013-SK-002 changed to “Flood depths are based on Preliminary 1% AEP flood level of RLm=11.7m and operative Waikato District Plan Map. In drawing 19013-SK-006 it is still mentioned the levels are still to be confirmed. As Appendix 11 contains correspondence with WRC where the level 11.7m is confirmed as the design levels for the pump station, it is considered that the comment has been answered.

### **Section 5.0 – Stormwater Management Approach**

This Section provides a high-level description of the proposed stormwater management plan. The proposed drainage, conveyance and treatment components are included in the acceptable practices described in RITS and WRC Stormwater Guidelines. A preliminary calculation of the pre and post-development flows is presented to estimate the effect of the proposed development and climate change on the stormwater runoff. Finally, a table with the provisions of the proposed stormwater management plan is provided to demonstrate the design criteria on which the detail design will be based on.

#### **Comments:**

- The existing SW network on Drawing 19013-C-0012 differs than the surveyed network shown on Drawing 18056-00-PL-100. The proposed pipeline diversion will need to be revised due to this update. In the final report, the drawing has been updated. The comment has been answered.
- Gross Pollutant Traps are not shown on the proposed stormwater plan. Drawing 19013-C-0012 needs to be updated accordingly. In final report, the drawing has been updated and includes indicative gross pollutant trap positions. The comment has been answered.
- A confirmation over the capacity of the existing stormwater network to accommodate the proposed additional stormwater runoff needs to be obtained from WRC. A confirmation from WRC has not been obtained, but WRC has reviewed and commented on the draft report. The final report has incorporated WRC comments, according to Appendix 10 – Communication Timeline. Also, in its submission on the plan change application, WRC is stating satisfaction with the updated three waters assessment report, therefore, the comment is considered answered.

### **Section 6.0 – Water Supply**

Section 6.0 refers to the water supply aspect of the proposed development. It includes a brief description of the existing and available water mains that are located close to the development site. There is a design flow estimate for the existing zoning, based on the Operative Waikato District Plan subdivision rules and a design flow estimate for the proposed plan change, based on RITS criteria. There is also a discussion over the firefighting demands for the proposed development.

#### **Comments:**

- Detailed documentation will be needed to confirm whether the storage of flammable material will need sprinklers or not. This could be provided during the next design stage of

the development. **Comment not answered, this will be addressed as part of resource consent application.**

- A confirmation by the WDC Development Engineer is needed as to whether the existing network can accommodate the additional water supply requirements of the proposed rezoning. **Appendix 13 in Final report contains a WDC letter confirming water supply network capacity. The comment has been answered.**

### **Section 7.0 – Wastewater**

Section 7.0 refers to the wastewater aspect of the proposed development. It includes a brief description of the existing wastewater gravity pipelines. There is a design flow estimate for the existing zoning, based on Operative Waikato District Plan subdivision rules and a design flow estimate for the proposed plan change, based on RITS criteria.

#### **Comments:**

- The proposed diversion of the existing wastewater pipeline needs to be revised in order to meet the RITS minimum clearance requirements (clearance from buildings). **Comment not answered, updated drawing 19013-C-0012 still shows wastewater diversion to be positioned under proposed new building. This matter will need to be addressed as part of the resource consent process.**
- A confirmation by WDC Development Engineer is needed as to whether the existing network can accommodate the additional wastewater flows. **Appendix 13 in Final report contains a WDC letter confirming wastewater network capacity. The comment has been answered.**

### **Sections 8.0, 9.0 and 10.0**

**Comments:** There are no comments on Sections 8.0, 9.0 and 10.0.

#### **Conclusion:**

We agree with the proposed approach regarding stormwater/flood management, water supply, and wastewater. We are satisfied that most of our comments, requests or issues raised were answered and/or addressed by the Final Report.

We also propose that the following should be addressed during resource consent application process:

- More detailed design to be provided to demonstrate the achievement of level-to-level flood volume compensation, including a more detailed plan of the proposed basin.
- More detailed calculations on stormwater runoff treatment and attenuation to prove that the proposed stormwater management/treatment layout is capable of meeting RITS and WRC standards and requirements.
- Detailed documentation will be needed to confirm whether the storage of flammable material will need sprinklers or not.
- The proposed diversion of the existing wastewater pipeline needs to be revised in order to meet the RITS minimum clearance requirements (clearance from buildings).



**Constantinos Fokianos**  
*Senior Drainage Engineer*  
*Bloxam Burnett & Olliver*

*21 January 2020*

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Assessment Review for S42A - 21.01.2020.docx

## Appendix 4

### Transportation Peer Review

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Memorandum From: Kathy Tao

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To: Chris Dawson

Project No: 132022.38

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CC:

Date: 28/01/20

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Subject: Builtsmart Proposed Expansion Private Plan Change 22 – Traffic Assessment

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## 1. Introduction

- 1.1. Bloxam Burnett and Olliver Ltd (BBO) has been commissioned by Waikato District Council to peer review the Integrated Transport Assessment (ITA) dated 10 July 2017 by Gray Matter Limited for Builtsmart Limited (the Applicant) proposed private plan change.
- 1.2. The proposal involves rezoning an area of land located immediately north of Builtsmart's existing site at 494 and 496 Great South Road / State Highway One (SH1) in Huntly.
- 1.3. As part of that peer review, a visit to the Builtsmart factory site and the surrounding roads network was conducted. This allows the peer review to be carried out with an understanding of the Builtsmart proposed activities and relevant transport needs.
- 1.4. This peer review assessed the Masterplan and was completed in August 2019. Further information were requested regarding the following six aspects of the application:
  - a) Rear end collision is identified as a common crash type (10 out of 13) near the site, this should be taken into consideration when recommending mitigation measures;
  - b) Reassess the vehicle swept path at the proposed new vehicle crossing and within the site using a 23-metre B-train 50MAX configuration;
  - c) Reassess the lane configuration along Great South Road (SH1) to accommodate the design vehicle (23-metre B-train 50MAX);
  - d) Lighting assessment at the proposed new vehicle crossing;
  - e) Reassess the traffic volumes in the adjoining road network once the Waikato Regional Transport Model (WRTM) has been updated; and
  - f) Address the potential effects of development should the area proposed to be rezoned be developed for general industrial activity on each of the four records of title.
- 1.5. This memo is prepared based on the updated ITA, Issue 1, dated 4<sup>th</sup> September 2019 (the ITA).

## 2. Updated ITA – The Applicant’s Responses and Further BBO Comments

### 2.1. Further Analysis of Risk associated with Rear-End Collision Crashes

- a) The ITA included further detailed review of the crash records. It identified that the rear-end crashes appeared to relate to queuing vehicles at the signalised Tregoweth Lane/Great South Road intersection. It concluded that the risk of rear end crash will be mitigated by reduced traffic volume on Great South Road following the anticipated opening of the Waikato Expressway Huntly Section in early 2020.
- b) Current traffic volume on the Great South Road is approximately 27,000 vehicles per day. The Waikato Regional Model (WRTM<sup>5</sup>) predicts a significant (up to 40%) reduction in daily traffic volume on Great South Road by 2021. As a result, the crash risk exposure is also expected to reduce significantly.
- c) BBO considers the ITA’s analysis acceptable. Nonetheless, traffic calming measures should be considered and integrated into the final road layout at the site access detailed design stage to provide for improved road safety. Examples of these measures are lower speed limit, change of lane configuration using road markings or other features.

### 2.2. Reassess Road Corridor Lane Configuration

- a) As per clause 2.3.1 above, to maintain safe and efficient road network operation, it is critical that the appropriate provisions are made for turning movements associated with the proposed activity. The ITA has stated that suitability of the roadway configuration including, lanes, flush median and shoulders would be reviewed at detailed design stage. This will occur at the time of resource consent application for the earthworks and later stages of the physical works.
- b) BBO recommends that appropriate process should be utilised to review and approve the final layout of the proposed access. This will ensure that risks associated with large vehicle turning movements are sufficiently addressed in the design prior to construction.

### 2.3. Reassess Vehicle Swept Path

- a) The ITA has provided swept paths analysis for 25m B-train which is the longest High Productivity Motor Vehicle (HPVM) widely used by the transport operators. It confirmed that both the road reserve and the site will be able to accommodate this large HPMV combinations.
- b) A swept path drawing is provided in the ITA. It is noted that the carriageway configuration used in the swept path drawing does not reflect the existing roadway layout. Therefore, the swept path analysis should be rerun in the detailed design stage to ensure that the turning movements are sufficiently designed for.

#### 2.4. Lighting assessment at the proposed new vehicle crossing

- a) BBO's peer review raised the need to assess lighting requirement at the proposed new large vehicle access. This is because that following the opening of the Waikato Expressway, Great South Road will still be classified as High Volume / Level 2 Road and traffic volume is expected to be approximately 16,000 – 18,000 vpd with approximately 1,200 – 1,300 HCVs.
- b) Moreover, it appears that the final layout of the access may involve relocation of a street light located north of the proposed access. Therefore, it is considered appropriate to provide relevant lighting assessment and incorporate necessary safety provisions for oversize vehicle turning movements at the night. i.e. temporary extra lighting.
- c) Appropriate process should be utilised to review and approve the final lighting design to ensure that risks associated with large vehicle turning movements at night are sufficiently addressed in the detailed design stage.

#### 2.5. Reassess the traffic volumes in the adjoining road network with updated WRTM

- a) The request was intended for the Applicant to acknowledge that the current version (August 2019) of WRTM typically underestimates the traffic volumes on the road network. Great South Road will still remain as a High Volume Road under the One Network Road Classification (ONRC) following the opening of Waikato Expressway Huntly section. Due consideration for a high volume road should be given in access design and road space reallocation.

#### 2.6. Address the potential effects of development should the area proposed to be rezoned be developed for general industrial activity on each of the four lots / Record of Titles

- a) BBO supports the proposed inclusion of a rule, that requires accessway authorisation for vehicle crossings in addition to that proposed as part of the Builtsmart expansion. This rule would manage the potential effects of possible individual industrial use of the properties and associated transportation impact.

### 3. Other Key Aspects of the ITA

#### 3.1. BBO agrees that the safety effects of the proposed activity and plan change can be sufficiently mitigated because:

- a) The expected opening of Waikato Expressway Huntly section will result in significant reduction in through traffic volume on Great South Road therefore decrease the road users' exposure to crash risk;
- b) While a new large vehicle access will be introduced, three existing accesses will be permanently closed;
- c) Sufficient sight distance and the flush median will provide for additional heavy vehicle movements at the proposed access;
- d) Over-dimension loads can be managed under the conditions of over-dimension permits, including requirements for temporary traffic management;



- e) Traffic calming measures can be incorporated through reallocating road space and as part of the new access design; and
  - f) The Safe and Appropriate Speed for Great South Road within Huntly Urban area is 60-70kph instead of the existing 80kph posted speed limit. As the lower speed reduces crash severity, the potential decrease of posted speed limit would also provide for road safety.
- 3.2. BBO agrees that the road efficiency effects of the proposed activity and plan change can be sufficiently mitigated because:
- a) The expected opening of Waikato Expressway Huntly section will result in significant reduction in through traffic volume on Great South Road therefore increase the road reserve capacity for the additional traffic associated with the proposed activity;
  - b) There is cluster of other industrial activities in the neighbouring area, road space has been sufficiently designed and constructed to provide for heavy commercial vehicles. The existing carriageway width and the flush median will provide for waiting space for right turning traffic and the wide shoulder will provide space for left turning vehicles to vacate the traffic lane while approaching the access;
  - c) Further, the northbound traffic has just passed the traffic signal and is unlikely to be traveling on high speed, i.e. greater than 70 kph. Southbound traffic will be approaching the signalised Tregoweth Lane intersection(approximately 150m) after just leaving the town centre, therefore is unlikely to accelerate to high speed. As a result, delays associated with turning vehicles are expected to be minimal;
  - d) Parking demand are fully met by onsite parking spaces; and
  - e) Construction traffic is temporary and can be managed by appropriately designed site traffic management plans.
4. BBO recommends the following conditions to be imposed on the BuiltSmart Expansion resource consents that will follow the completion of the plan change process:
- 4.1. The detailed site layout plan shall be submitted to Waikato District Council for approval prior to construction.
  - 4.2. The existing accesses located at 478, 486, 492 State Highway 1, Huntly shall be permanently closed. Boundary fences, berm, foot path and kerb should be reinstated at the applicant's cost.
  - 4.3. The proposed new heavy vehicle crossing shall be designed and constructed to meet the Waikato District Council's requirements specified in the Waikato Regional Infrastructure Technical Specifications.
  - 4.4. Access lighting requirements for night time transport activities must be assessed by a suitably qualified and experienced engineer. The outcomes of the assessment shall be submitted to the Waikato District Council for reference. Any lighting design shall be submitted for approval by relevant road controlling authority.



- 4.5. Any additional stormwater runoff shall be managed to mitigate any adverse impact on the surrounding land including the road reserve. A site stormwater management plan shall be submitted to the Waikato District Council for approval.
- 4.6. A site signage plan shall be submitted to the Waikato District Council for approval. The signage plan shall indicate the details (e.g. locality, size, face design) of any internal traffic management signs and private advertising signs. Advertising signs shall comply with requirements of relevant road controlling authority.
- 4.7. A construction management plan including any temporary traffic management plans are submitted to the relevant road controlling authority for approval. i.e. if Great South Road is still part of State Highway One, to the NZ Transport Agency; if Great South Road is revoked and becomes a local road, to the Waikato District Council.
- 4.8. A designated heavy vehicle loading bay will be provided and marked within the trades and services area.
- 4.9. The existing vehicle crossing at 498 Great South Road shall be resurfaced to meet requirements specified in the Waikato Regional Infrastructure Technical Specification.

## 5. Issues Raised in the Submissions

### 5.1. Submitter 1 – NZ Transport Agency

The NZ Transport Agency support the plan change proposal providing a number of conditions are met. The table below summarises the imposed conditions and relevant mitigation measures proposed in the ITA to comply with these conditions.

Ref.	Description	Mitigation Proposed Measures
a)	New heavy vehicle crossing is constructed in accordance with Council requirements	The ITA proposed that the detailed design will be reviewed and approved by the Waikato District Council(WDC). The heavy vehicle crossing will be formed in accordance with the District Plan Appendix A Figure 7. A condition (refer the proposed condition in clause 4.3) will also be imposed by the WDC as part of the outcomes of the Proposed Plan Change 22.
b)	Existing accesses located at 478, 486, 492 State Highway 1, Huntly shall be permanently closed;	The ITA proposed to permanently close the three vehicle crossings. A condition (refer the proposed condition in clause 4.2) will also be imposed by the WDC as part of the outcomes of the Proposed Plan Change 22.
c)	A construction management plan is provided	A condition (refer the proposed condition in clause 4.7) will be imposed by the WDC as part of the outcomes of the Proposed Plan Change 22.
d)	A stormwater design is provided to demonstrate that on-site stormwater will not adversely affect the State Highway	A condition (refer the proposed condition in clause 4.5) will be imposed by the WDC as part of the outcomes of the Proposed Plan Change 22.

e)	The applicant shall provide a signage design and plan for approval by NZTA prior to installation.	As part of the outcomes of the Proposed Plan Change 22, a condition (refer the proposed condition in clause 4.6) will be imposed by the WDC to request the site signage plan to be presented to both the WDC and the NZ Transport Agency for approval .
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## 5.2. Submitter 4 – Property Owner at 5 Jackson Road, Huntly

The Submitter wishes to ensure that Jackson Road will not be opened to Great South Road and that no operational traffic associated with the activity utilises Jackson Road.

The ITA's conclusions and BBO's recommended conditions on subsequent resource consent applications provide assurance that Jackson Road will not be opened to Great South Road and that no operational traffic associated with the activity utilises Jackson Road.

## 5.3. Submitter 5 – Property Owner at 6 Jackson Road, Huntly

The Submitter is Concerned at the use of the accessway next to her property for access to the site.

The ITA's conclusions and BBO's recommended conditions provide assurance that the proposed activity and plan change do not result in the use of the accessway next to 6 Jackson Road. The road access to Great South Road for this property is via Jackson Road, through George Drive and Spiers Road some 500m north of the proposed heavy vehicle crossing.

Overall, BBO considers that the proposed activity is suitably located within an area which has cluster of existing heavy industry activities. With mitigation measures stated in the ITA and conditions recommended in section 4 of this memo, the road transport network can safely and efficiently accommodate the proposed expansion and rezoning with less than minor effects.

Bloxam Burnett & Olliver Ltd



Kathy Tao

Traffic Engineer

## Appendix 5

### Summary of Submissions

# Waikato District Council Proposed Plan Change 22: Builtsmart Limited

## Summary of Submissions

Submitter number	Submitter	Organisation	Address/Email/Phone	Wish to be heard?	Submission Point	Support/Oppose/Seek Amendment	Plan Provision	Summary	Decision sought
1	Ashleigh Peti	NZ Transport Agency	P O Box 973 Waikato Mail Centre Hamilton 3240  <a href="mailto:hamiltonplanning@nzta.govt.nz">hamiltonplanning@nzta.govt.nz</a>  07 958 7220	Yes	1.1	Support with conditions	NA	NZTA support the plan change proposal providing a number of conditions are met: a) New heavy vehicle crossing is constructed in accordance with Council requirements; b) Existing accesses located at 478, 486, 492 State Highway 1, Huntly shall be permanently closed; c) A construction management plan is provided; d) A stormwater design is provided to demonstrate that on-site stormwater will not adversely affect the State Highway; e) The applicant shall provide a signage design and plan for approval by NZTA prior to installation.	Approve.
2	Miffy Foley	Waikato Regional Council	Private Bag 3038 Waikato Mail Centre Hamilton 3240  <a href="mailto:Miffy.foley@waikatoregion.govt.nz">Miffy.foley@waikatoregion.govt.nz</a>  07 839 0516	No	2.1	Support	NA	WRC supports the plan change and considers that it achieves the following: a) Reduced level of residual risk from natural hazards through a change to a less sensitive land use (light industrial from residential). b) Consistency with the Waikato Regional Policy Statement which requires that industrial development locate within Strategic Industrial nodes of which Huntly is one. c) Maintains access to the stop bank which will allow for continued operation and maintenance by Waikato Regional Council staff.	Approve, no specific relief sought.
					2.2	Support	NZ	WRC considers that the three waters report provided with the application is acceptable. The submitter notes that the application assumes the proposed stormwater discharge from the expansion area will be authorised under the existing Waikato District Council Comprehensive Stormwater Discharge Consent for Huntly. The submitters considers that this may not be the case and requests the opportunity to review the detailed stormwater design when it becomes available.	No specific amendments are sought.

Submitter number	Submitter	Organisation	Address/Email/Phone	Wish to be heard?	Submission Point	Support/Oppose/Seek Amendment	Plan Provision	Summary	Decision sought
3	David Whyte	Huntly Community Board	38 Ohinewai North Road R D 1 Huntly 3771  027 558 4448  <a href="mailto:Davidwhyte.5th@gmail.com">Davidwhyte.5th@gmail.com</a>	Yes	3.1	Support	NA	The submitter considers that the economic benefits flowing from the proposed plan change will be significant but notes that potential adverse effects on nearby residents and the community need to be taken into account.	Approve
					3.2	Support	NA	The submitter considers that the proposed plan change has been well thought through and incorporates changes made in discussion with local residents. These include: a) Zone change only applies to land that is occupied by Builtsmart; b) No construction traffic on local roads; c) Significant setbacks of 25 metres between the activity and the nearby residents to reduce or eliminate negative impacts; d) Careful approach to the localised management of stormwater and local ponding.	Approve
					3.3	Support	NA	Submitter considers that the issue of dust contamination building up over time in the river close to where the Huntly water intake is located. Submitter seeks the following conditions to be applied to any activity on site: a) Active dust extraction to minimize dust; b) Dust producing activities to be undercover; c) Any work carried out that is not undercover to include prompt removal of dust to avoid it getting into the stormwater system.	Approved with inclusion of conditions in relation to dust management.
4	Megan Anne & William B Ryder	Landowner	5 Jackson Road Huntly Waikato 3700  <a href="mailto:megnbro@outlook.com">megnbro@outlook.com</a>  021 877 984	Yes	4.1	Support	NA	Submitter is concerned at the potential for dust from demolition and building activity on site and wants to ensure that adequate dust mitigation is in place.	Approved subject to appropriate dust mitigation being in place
					4.2	Support	NA	Submitter wishes to ensure that Jackson Road will not be opened to Great South Road and that no operational traffic associated with the activity utilises Jackson Road.	Approved subject to confirmation that Jackson Road will not be used for operational activity and will not be opened to Great South Road.

5	Carol Trevelyan	Landowner	6 Jackson Road Huntly Waikato 3700  07 828 9068	No	5.1	Oppose	NA	Submitter is concerned that the plan change will alter the value of her property as it was bought for her retirement. Property will be affected by noise from the building activity and dust.	Do not proceed with the plan change.
					5.2	Oppose	NA	Concerned at the use of the accessway next to her property for access to the site.	Her property should be purchased by the applicant.

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