

## Further Submission on Proposed Private Plan Change 57 (Calcutta Farms Limited Plan Change, Matamata)

*Schedule 1 of the Resource Management Act 1991*



**To: Matamata-Piako District Council**

### Further submitter's details:

Name: J Swap Contractors Ltd

Contact person: Dudley Clemens

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E-mail (i.e. electronic address for service): dudley.clemens@jswap.co.nz

**This is a further submission in support of or in opposition to a submission on Private Plan Change 57.**

**Private Plan Change 57 – Calcutta Farms Limited** is a proposal that seeks to rezone approximately 41ha of land located on the southern side of State Highway 24, Matamata from Rural Zone to Industrial Zone in conjunction with a Development Area Plan (DAP). The site is located on the eastern side of Matamata and is adjacent to the Matamata Transfer Station.

I am (tick one):

☐ A person representing a relevant aspect of the public interest (please explain how you fall within this category):

\_\_\_\_\_  
\_\_\_\_\_

☒ A person who has an interest in the proposal that is greater than the interest that the general public has (please explain how you fall within this category):

J Swap contractors Ltd is an industrial activity with long-established history and knowledge of Matamata, it's growth, and that understands the needs of industrial activities.

☐ The local authority for the relevant area.

**I support / oppose the following submissions** Please see attached document

Please complete the attached page/(s)

I wish to present at the council planning hearing:

☒ Yes ☐ No

**PLEASE NOTE: IF YOU DO NOT TICK EITHER "YES" OR "NO" ABOVE, THEN IT WILL BE ASSUMED THAT YOU DO NOT WISH TO BE HEARD.**

I would be prepared to present a joint case at the hearing with others making a similar submission:

☒ Yes ☐ No



Signed: \_\_\_\_\_ Date: 20.03.23

**Notes:**

- **Further submissions close at 4.30pm Tuesday 21 March 2023.**
- A copy of your further submission must be sent to the original submitter within five working days of sending your further submission to Council.
- Please send the completed form to: Matamata-Piako District Council, 35 Kenrick Street, PO Box 266, Te Aroha 3342, or email to [submissions@mpdc.govt.nz](mailto:submissions@mpdc.govt.nz), or complete online at [mpdc.nz/calcutta](http://mpdc.nz/calcutta); or you can drop it off at any Council office before the closing date.

Office use only:

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**Please fill in a new box/ page for each submission point.**

(For instance if you are making further submissions on four submission points please attach one page for each submission point eg. four pages in total)

(Attach additional copies of this page as necessary)

Further Submitter Name: J Swap Contractors Ltd

Submission Number (1 - 29 – PLEASE SELECT ONE): Please see attached document

Position (please tick one): Support ☐ Oppose ☐

Reason for position:

Please see attached document

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Decision sought from Council (Please tick appropriate box and complete below):

☐ Allowed in whole

☐ Allowed in part

Which

part? Please see attached document

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☐ Disallowed in whole

☐ Disallowed in part

Which

part? Please see attached document

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Please download additional pages if required online at [mpdc.nz/calcutta](http://mpdc.nz/calcutta)



**FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 57 CALCUTTA INDUSTRIAL ZONES TO  
THE MATAMATA-PIAKO DISTRICT PLAN PURSUANT TO CLAUSE 8 OF THE FIRST SCHEDULE  
OF THE RESOURCE MANAGEMENT ACT 1991**

**To:**

☐  
☐  
Don McLeod - Chief Executive  
Matamata-Piako District Council  
35 Kenrick Street  
Te Aroha 3840

Via email only: [submissions@mpdc.govt.nz](mailto:submissions@mpdc.govt.nz)

**Submitter:**

J Swap Contractors Ltd  
PO Box 153  
Matamata 3440

Attention: Dudley Clemens, Environmental Manager

**Address for service:**

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Matamata 3440

Attention: Dudley Clemens

Phone: 0800 807 927

Email: [dudley.clemens@jswap.co.nz](mailto:dudley.clemens@jswap.co.nz)

**c.c**

4Sight Consulting Limited  
214 Durham Street South  
Christchurch Central  
Christchurch 8011

Attention: Duncan Whyte

Phone: 021 065 0385

Email: [duncan.whyte@4sight.co.nz](mailto:duncan.whyte@4sight.co.nz)

## 1. INTRODUCTION

1. ☐ J Swap Contractors Limited (J Swap) are a family-owned business that undertake a range of commercial and industrial activities, namely:
  - a. ☐ Stockfoods;
  - b. ☐ Aggregates;
  - c. ☐ Civil;
  - d. ☐ Transport;
  - e. ☐ Storage and Logistics;
  - f. ☐ Forestry Construction; and
  - g. ☐ Traffic Management.
2. ☐ J Swap's business headquarters are located at 7 Pepper Street Matamata. From here J Swap manage all of their commercial and industrial activities and interests across New Zealand. The company has a long-established history in Matamata and providing these range of services that are closely aligned to the development of the town. In 1934 J Swap extracted river gravel from the Waiomou Stream for use by local farmers and local builders in concrete production and infrastructure construction work in and around Matamata. This history of almost 90 years provides J Swap with a strong understanding of the history of the town's development and the needs of local industry.
3. ☐ The industrial environment and surrounds are an essential factor to J Swap operating in Matamata.
4. ☐ The submitter supports the acceptance of Plan Change 57 (PC57) as recommended in the Matamata-Piako District Council's own submission.
5. ☐ The submitter opposes the submissions which seek for the plan change to be declined, including those by Waikato Regional Council, Barr Harris Surveyors Ltd, and Harlow Holdings Ltd.
6. ☐ These further submissions and the reasons for the same are set out within the following table, entitled 'Further Submissions to Proposed Plan Change 57 Calcutta Industrial Zone to Matamata-Piako District Plan.
7. ☐ J Swap operates industrial activities, has a long-established history and knowledge of Matamata, its growth, and understands the needs of industrial activities. It is also a large industrial land holder, which makes it a person with an interest that is greater than the interest that the general public has.

Signed on behalf of J Swap Contractors Ltd



**Dudley Clemens**  
Environmental Manager  
21 March 2023

## 2. Plan Change 57 - Calcutta

PC57 seeks to rezone approximately 41ha of land located on the southern side of Tauranga Road from rural to a General Industrial Zone (GIZ).

The GIZ is proposed to have specific provisions that will provide for dry-industry, which will have low impact on water and wastewater services. As well as providing for some activities that are supportive of industrial activities and/or activities that are compatible with the adverse effects generated by industrial activities.

In addition to this, PC57 also seeks to introduce the Calcutta Development Area Plan (refer Figure 1 below) which offers a future development framework.

Figure 1: PC57 Development Area



Figure 6: Development Area Plan

Source: Calcutta Farms Ltd, Calcutta Industrial Zone Plan Change, page 14

## 3. Supporting Information relating to this Further Submission

### 3.1 J Swap Contractors Limited

A subsidiary company of J Swap, Swap Stockfoods Ltd operates a nationwide business importing a range of stockfood products which act as a feed supply to a range of agricultural industries. The range of feed stocks imported include Palm Kernel Expeller (PKE), tapioca, wheat bran pellets, crushed barley, kibbled maize, cotton seed, canola meal, dried distillers grains (DDG).

FINAL SIGNED J Swap Further Submissions to proposed Calcutta Industrial Plan Change 57\_ 20 March 2023.docx

The importation and distribution process requires handling of substantial volumes of product, carting from Ports of entry to product warehouses, where processing and redistribution to customers occurs. Large lot industrial sites close to existing facilities are necessary for this supply chain model.

The handling process involves no manufacturing or additions to the product. No change of state occurs, and no chemicals are added. No heat or steam is added, and no burning occurs.

The product warehouses are effectively very large concrete and steel sheds, which are specifically designed to have heavy weight put on the floors and against the walls, without failure of the structure. This enables product to be stockpiled on the concrete floor and against the walls in large quantities. Product is moved around the warehouse with wheel loaders and excavators. Trucks drive into the warehouse covered, to unload and be loaded.

For other businesses, J Swap is engaged in the extraction, processing and transporting of aggregate (crushed rock, gravel and sand), overburden and cleanfill; and has substantial investment in land and other capital assets in the quarry industry. J Swap currently operates ten hard rock quarries across the Waikato and Bay of Plenty regions, including within the Matamata Piako District and surrounding areas; and ranks as fourth largest producer of aggregates by volume in New Zealand.

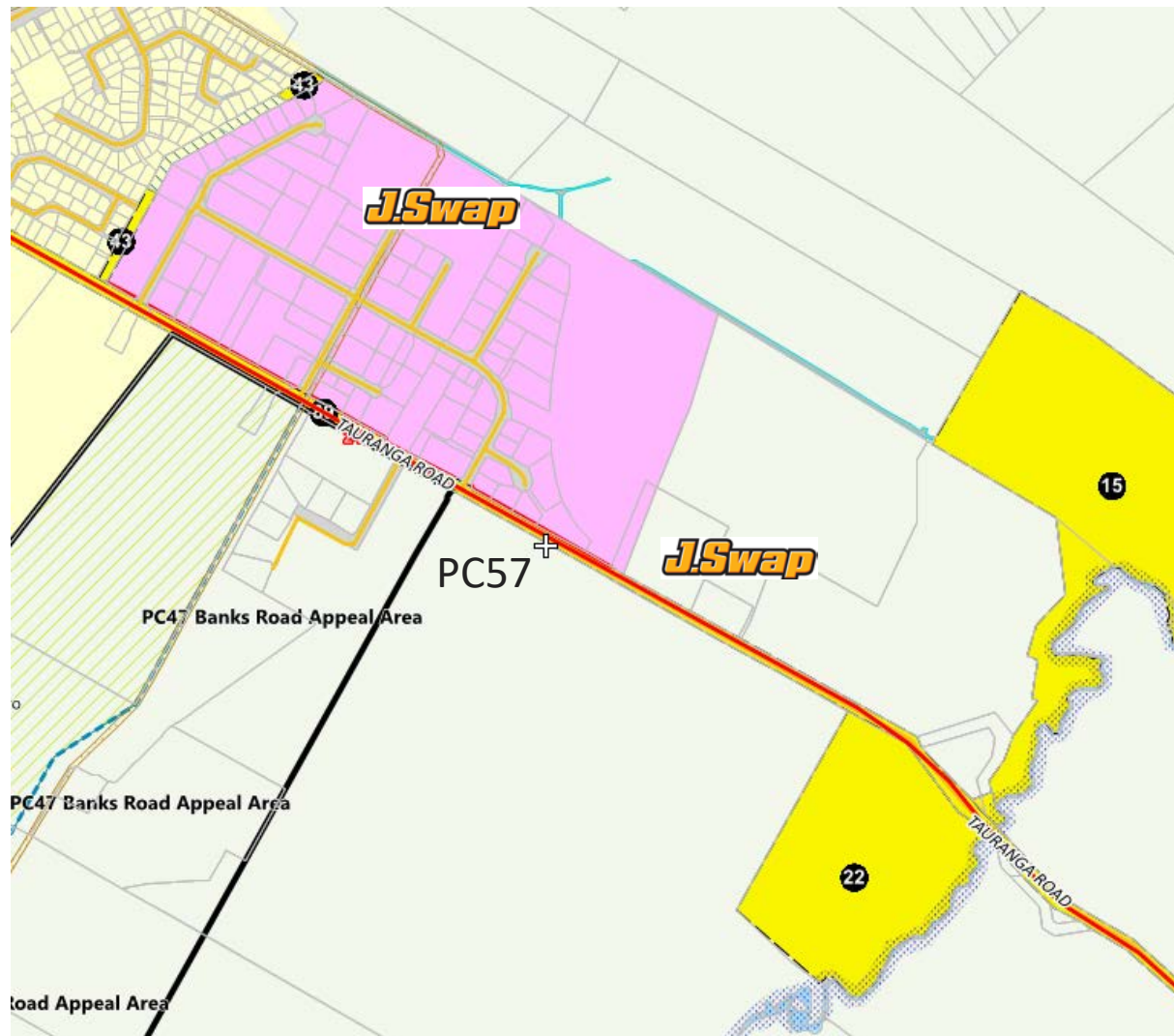
J Swap is a significant contributor to the economic growth and development of urban and rural communities throughout New Zealand.

Primarily with the stockfood business, J Swap are a key stakeholder within the industrial sector of Matamata, and their interests in the rezoning of industrial land directly affect their ability to expand their business locally. This will support employment within the community and also support J Swap's ability to centralise their nationwide business operations.

J Swap's office and largest industrial landholdings in Matamata are located in the existing Industrial Zone north of Tauranga Road (SH 24) and this is immediately to the north of PC57. That is less than 250 metres from the plan change application site. However, their closest property that is immediately across the site on Tauranga Road (SH 24) and so it is even closer (approximately 25 metres). Figure 2 provides an indication of the proximity of these locations to the PC57 site (but does not identify all land owned by J Swap).



Figure 2: J Swap locations



Source: [Geospatial Portal \(mpdc.govt.nz\)](https://mpdc.govt.nz) (with annotations added)

J Swap support the expansion of land zoned for industrial uses as proposed in PC57 because we understand the importance of local industry as a source of employment and its broader contributions to the local economy. In our view an expansion of industrial land is vital to the continued growth of Matamata and the surrounding area.

### 3.2 Matamata

Locally, it has been identified that approximately 10ha of industrial zoned land will be required by 2031, while long term these figures indicate up to approximately 28ha will be needed. The proposed industrial plan change meets these projected demands and strategically caters for industrial needs of the future, aligning with the National Policy Statement for Urban Development. Additionally, PC57 rationalises the spatial development of Matamata. By localising the industrial zoning, the plan change



avoids reverse sensitivity issues with residential and rural environments, while transport links have been designed to facilitate multi-modal transport links to the centre of Matamata.

Matamata-Piako District Council has been aware of shortfall of industrial land in the district and has worked alongside the Developer to facilitate the rezoning of industrial land, while Waka Kotahi have also provided valuable advice to facilitate the practicalities of transport links associated with State Highway 24. PC57 is supported by many local businesses and groups, Matamata Chamber of Commerce a key stakeholder who represents the wider business community, has submitted in favour of the PC57 being accepted.

The plan change is supported by many assessments demonstrating the value and viability of the proposed rezoning. Appendix L: Market Economics and Appendix E –Integrated Transport Assessment, particularly, analyse the feasibility of rezoning to industrial land and provide recommendations to achieve best practice and design outcomes, while illustrating the importance of access to major transport routes for industry and local populations.

J Swap are one of the parties whom are affected by the current shortfall of industrial zoned land locally, effectively stymying growth and removing opportunities to build new facilities and support businesses as needed. If plentiful local industrial land supply occurs, then choices of appropriate sites become available and the cost of set up and operation are not artificially inflated nor constrained.

J Swap employ a large number of people who work within the industrial area. Attracting talented employees to work for our companies is an important priority. Fortunately, Matamata is very attractive option for families to reside, with affordable housing, wide range of schooling, sports facilities and bustling town centre. Typically our employees wish to work close to home, which in turn requires industrial land supply within Matamata.

Suggesting the alternative and distant location such as Waharoa does not provide the same level of attraction, nor benefits to employees, and as such becomes more difficult for J Swap to attract candidates. We believe that people should be given the choice to choose where to live and work.

### **3.3 National Policy Statement for Highly Productive Land**

The growth of urban areas is possible under the National Policy Statement for Highly Productive Land (NPS-HPL) if it can be demonstrated that there is a need to provide for urban expansion. In our view it is far more preferable to expand at the perimeter of existing urban areas, close to existing businesses such as J Swap, than it is to establish isolated areas for industrial uses, such as within Waharoa.

Additional industrial land supply close to existing J Swap businesses enable transport efficiencies, access to support services, and staffing.

J Swap's industrial land holdings located in the existing Industrial Zone are classed LUC 2. Figure 3 demonstrates that all of the immediately surrounding areas at the perimeter of Matama Urban Area are either LUC 1 or LUC 2. The growth of Matamata will inevitably be located in these areas of highly productive land. This conflict of uses is unavoidable.

The alternative is that the business community does not physically grow, which from a business perspective, is an unrealistic outcome. Without industrial land supply, this would act to arbitrarily place a restriction on the potential for J Swap businesses to expand.

The trade-off between providing for the use of highly productive land to those other needs for businesses to grow, has been taken into account within PC57. We believe that PC57 adequately provides for this trade-off, allowing for an adequate supply of industrial land locally, whilst only removing land from primary production as necessary, leaving a plentiful amount of LUC 1 and 2 land left for agricultural production. PC57 seeks to meet the long-term needs of the area for several decades ahead.

It is J Swap's view that the HPL conflict should not be a barrier to approving this plan change.

Figure 3: Land Use Capability for Matamata



Source: [Land Use Capability » Maps » Our Environment \(scinfo.org.nz\)](https://scinfo.org.nz/land-use-capability-maps-our-environment)

## Summary

The above information forms the basis of understanding of PC57 and as background for the reasons for further submissions as outlined in the table below.

#### 4. FURTHER SUBMISSIONS TO PROPOSED PLAN CHANGE 57 CALCUTTA INDUSTRIAL ZONE TO THE MATAMATA-PIAKO DISTRICT PLAN

Submitter Name	Submission Number	Relevant PC57 Provision / Topic	Submission	Support/ Oppose	Reasons	Decision Sought
Milestone Homes Matamata Ltd	6	Accept the Plan change	Industrial Land is critical for the Growth and well-being of any community	Support	J Swap agrees that the proposed industrial land is well placed consolidating industrial land, locating it off SH24. It will not result in fragmentation of zoning. As a key stakeholder in this industry, J Swap can evidence that availability of industrial land is limiting growth of the community.	Accept Plan Change
Matamata Chamber of Commerce	8	Accept the Plan change	The proposed industrial land would have a positive influence for the growth of the Matamata Business sector	Support	J Swap agrees that there is an identified need for further expansion and the shortfall of industrial land limits business opportunities within Matamata. This is substantiated by Appendix L The Economic Assessment prepared by Market Economics Ltd, the assessment demonstrates that Projected Industrial Land Demand within Matamata by 2031 is an additional 10.1ha. (Page 27) Long Term it is expected that there is a demand for 17.9 to 28.7ha of industrial land within Matamata.	Accept Plan Change
Classic Group Ltd	14	Accept the Plan Change	The PC57 site is well located for industrial activities. It has excellent access to State Highway 24 and its proximity to existing industrial zoned land on the northern side of SH24 will enable development of	Support	J Swap supports this position as the location of the site will extend the existing industrial zone and not result in fragmentation of zones within the community. As provided by Appendix E – The Integrated Transport Assessment, Calcutta, the developer, will meet the minimum transport upgrade required for the intersection at State Highway 24 (page 31). Conclusions made by the Transport Assessment have identified that the overall transportation effects on the adjoining road	Accept Plan Change

Submitter Name	Submission Number	Relevant PC57 Provision / Topic	Submission	Support/ Oppose	Reasons	Decision Sought
			enlarged employment and services cluster.		<p>network with the introduction of the proposed rezoning are expected to be minor to moderate if no transport mitigation measures are implemented. However, if the recommendations of the report are implemented, effects can be sufficiently mitigated. It is expected that transport can therefore be adequately provided for with the proposed zoning change.</p> <p>J Swap agrees that industrial land is needed to support business needs within the community and while the land is Class 1 and 2 LUC land, all land surrounding Matamata falls into these categories. As the proposed plan change was notified 11 October 2022, prior to the NPS-HPL commencement, the land affected by the proposed plan change is not subject to the transitional definition of 'highly productive land' under the NPS-HPL. The submitter however notes that the assessment undertaken in the Memo to MPDC regarding NPS Highly Productive Land, demonstrates that PC57 is consistent with the criterion set out in section 3.6 of the NPS-HPL. In particular, there is no option to grow Matamata without using land with a 1-3 land use classification.</p>	
Waikato Regional Council	16	Decline the Plan Change	<p>The submitter wishes to oppose the following points made by WRC:</p> <ul style="list-style-type: none"> <li>• <input type="checkbox"/> The rezoning is contrary to the National Policy</li> </ul>	Oppose	As discussed above, the proposed plan change was notified 11 October 2022, prior to the NPS-HPL commencement, the land affected by the proposed plan change is not subject to the transitional definition of 'highly productive land' under the NPS-HPL. However, the industrial land is needed to support business needs within the community and while the land is Class 1 and 2	Accept Plan Change

Submitter Name	Submission Number	Relevant PC57 Provision / Topic	Submission	Support/ Oppose	Reasons	Decision Sought
			<p>Statement – Highly Productive Land (NPS-HPL). The rezoning proposal does not comply with the criteria under the NPS-HPL for rezoning.</p> <ul style="list-style-type: none"> <li>□ The land supply assessments do not support the rezoning proposal and sufficient industrial land supply is available for the next 10 years.</li> <li>□ Any shortfall of industrial land should be supported by a district wide assessment of appropriate areas for rezoning.</li> </ul>		<p>LUC land, all land surrounding Matamata falls into these categories. The submitter notes that the assessment undertaken in the Memo to MPDC regarding NPS-HPL demonstrates that PC57 is consistent with the criterion set out in clause 3.6 of the NPS-HPL, and there is no option to grow Matamata without rezoning land that is not LUC 1 to 3.</p> <p>The NPS-HPL and NPS-UD must be considered in an integrated manner. Clause 3.6 pf the NPS-HPL allows the rezoning of highly productive land to urban to provide sufficient development capacity where this is required under the National Policy Statement for Urban Development (NPS-UD), as outlined in the NPS-HPL Guide to Implementation (MfE). The applicant's assessment of the NPS-UD (section 9.1.1, page 48) concludes that the proposed plan change would positively address and be consistent with the principles of the NPS-UD. Therefore, when considering the NPS-HPL and NPS-UD in tandem, the policy frameworks support the rezoning of this site to Industrial.</p> <p>J Swap disagrees that the land supply assessments do not support the rezoning proposal. The Economic Assessment by Market Economics Ltd concludes that there is likely to be a shortfall of industrial land within the southern Matamata-Piako District. J Swap acknowledges that this shortfall is likely to occur beyond the current decade, but emphasises the importance of planning for the future and not waiting until the shortfall has already</p>	

Submitter Name	Submission Number	Relevant PC57 Provision / Topic	Submission	Support/ Oppose	Reasons	Decision Sought
					<p>occurred. In addition, the NPS-UD buffers are likely to lead to a more significant shortfall in industrial land capacity than was identified by Market Economics Ltd, as noted on page 18 of the peer review by Property Economics.</p> <p>J Swap acknowledges that a District-wide assessment of appropriate areas for rezoning may be beneficial in theory, but does not consider this to be a legitimate reason to decline the proposed plan change. The s32 report concluded that the costs of waiting for MPDC to review outweigh the benefits (Appendix C, pages 1-3). Although this is referring to a District Plan Review, the content of this s32 analysis can be reasonably applied to a District-wide assessment of appropriate areas for rezoning.</p>	
Barr Harris Surveyors Ltd	17	Decline the Plan Change	<p>The submitter wishes to oppose the following points made by Barr Harris Surveyors Ltd:</p> <ul style="list-style-type: none"> <li>□ The plan change is predicated on a 250ha master plan for the east side of Matamata. The master plan needs to be assessed in terms of the overall spatial and future</li> </ul>	Oppose	<p>The Calcutta Master Plan referred to by Barr Harris Surveyors Ltd is a conceptual document developed privately by the landowners as a guide for future development. It does not have any legal weight, and to undertake any activities or development shown on the plan it is necessary to undertake either District Plan change/review or obtain resource consents, which requires a full assessment of effects on the wider Matamata township, as has been undertaken as part of this application. The technical reports provided as part of the application give evidence that the proposal plan change will not have a negative impact on the overall spatial and future development of the township. For</p>	Accept Plan Change



Submitter Name	Submission Number	Relevant PC57 Provision / Topic	Submission	Support/ Oppose	Reasons	Decision Sought
			<p>development of the Matamata township.</p> <ul style="list-style-type: none"> <li>• <input type="checkbox"/> The spatial extent and location of the rezoning is inappropriate.</li> <li>• <input type="checkbox"/> Matamata has existing traffic issues. Connectivity issues will arise unless a town wide development strategy is prepared and followed.</li> <li>• <input type="checkbox"/> The ME (economic report) does not take into account Mowatt St (Waharoa) in terms of current industrial land supply. Further industrial land supply is likely to come from the Waharoa Plan Change. Sufficient land is available for industrial development.</li> <li>• <input type="checkbox"/> The impacts on Council services have not been adequately quantified or assessed.</li> </ul>		<p>example, the economics assessment by Market Economics Ltd found that the location of the proposed additional Industrial Zone is consistent with Matamata's current and future spatial economic structure (Appendix L, page 37). Overall, the application has demonstrated that the spatial extent and location of the rezoning is appropriate.</p> <p>In terms of traffic issues, these can be appropriately managed by undertaking the recommendations of the Integrated Transport Assessment by Bloxam Burnett &amp; Olliver, which the application has stated is to occur (section 7.3, pages 34-37).</p> <p>J Swap considers the impacts on Council services to have been adequately quantified and assessed. The infrastructure report by Bloxham, Burnett &amp; Olliver concludes that the site can be readily serviced by roading and stormwater, and although there are constraints around supply of water and disposal of wastewater, the report offers viable options to address these constraints, including upgrading the Matamata WWTP (Appendix D, page 27).</p> <p>The Waharoa Plan Change (Plan Change 49) is in very early stages and no conclusions can be drawn about what this might entail, and if it will rezone Mowatt Street to Industrial. The submission from Barr Harris Surveyors Ltd states that industrial activities in the recent Mowatt Street subdivision rely on site specific land-use consents for light industrial activities and that sites are not</p>	

Submitter Name	Submission Number	Relevant PC57 Provision / Topic	Submission	Support/ Oppose	Reasons	Decision Sought
			<ul style="list-style-type: none"> <li>□ Potential issues with the NPS-HPL and loss of productive land. A well-planned development strategy is necessary for any future rezoning of Matamata.</li> <li>□ Input is requested on rule provisions.</li> </ul>		<p>served for reticulated wastewater disposal. The submitter acknowledges that MPDC could potentially establish wastewater connections to the Mowatt Street subdivision, as suggested by Barr Harris Surveyors Ltd, but this would require significant further investigation., The submitter considers the viability of industrial land in Waharoa to be too uncertain at this stage.</p> <p>As discussed above, the proposed plan change was notified 11 October 2022, prior to the NPS-HPL commencement, the land affected by the proposed plan change is not subject to the transitional definition of 'highly productive land' under the NPS-HPL. Regardless, the industrial land is needed to support business needs within the community and while the land is Class 1 and 2 LUC land, all land surrounding Matamata falls into these categories. J Swap notes that the assessment undertaken in the Memo to MPDC regarding NPS Highly Productive Land demonstrates that Plan Change 57 is consistent with the criterion set out in clause 3.6 of the NPS-HPL, and there is no option to grow Matamata without rezoning land with a 1-3 land use classification. A development strategy for the future rezoning of Matamata would still be required to address the same issues.</p>	
Matamata-Piako District Council	20	Accept the Plan Change	Council supports the private plan change and Council and its staff have enjoyed working with	Support in part	J Swap agrees with the Council who is well apprised of the needs of the community, and the need for industrial land to be provided for the expansion of the business community.	Accept Plan Change

Submitter Name	Submission Number	Relevant PC57 Provision / Topic	Submission	Support/ Oppose	Reasons	Decision Sought
			the applicant to achieve good outcomes for the community.			
Maven Matamata Ltd	21	Accept the Plan Change	Matamata has a strong industrial sector. Matamata is centrally positioned between Tauranga and Auckland and is in an ideal position to improve it manufacturing, construction, wholesaling, transport and logistics sectors.	Support	J Swap agrees with this position and sees the proposed industrial area as necessary to be able to expand operations in Matamata. As the submitter falls within these sectors, being able to provision Hamilton, Tauranga and Auckland from this base is vital to the success of their business.	Accept Plan Change
Waka Kotahi NZ Transport Agency	23	Support in part	Pedestrian access to buildings from the State Highway	Neither	<p>J Swap agrees in part with the Waka Kotahi submission as Point 4 (page 3) of the submission notes that the long-term aspiration is for the PPC 57 to form part of a wider mixed use urban extension to Matamata. It has the potential to provide integrated compact form that supports multi modal accessibility and could contribute to a well-functioning urban environment. They also note that the PPC 57 addresses a local shortage of industrial land, and this may help with more local job opportunities. J Swap agrees with Waka Kotahi and notes this plan change provides land which will enable employment opportunities close to town and provides local transport benefits of being able to walk and cycle from this area.</p> <p>J Swap therefore agrees with Waka Kotahi on the point that clarification is required where pedestrian users can access sites, so that they shall not access buildings via</p>	Accept Plan Change

Submitter Name	Submission Number	Relevant PC57 Provision / Topic	Submission	Support/ Oppose	Reasons	Decision Sought
					State Highway frontage. The safety of the transport corridor for road users and pedestrians is necessary for the functioning of the roading network and will enable safety for these multi modal transport users.	
Harlow Holdings Limited	29	Decline the Plan Change	<p>The submitter wishes to oppose the following points made by Harlow Holdings Ltd:</p> <ul style="list-style-type: none"> <li>• <input type="checkbox"/> The Plan is: Contrary to the RMA; Contrary to the District Plan; and, Does not represent the most appropriate way to achieve the objectives and policies of the District Plan.</li> <li>• <input type="checkbox"/> It would be more appropriate for the land to be zoned residential or retained and rural land.</li> <li>• <input type="checkbox"/> Connectivity upgrades are necessary for any rezoning, specifically road connection to 26 Rockford St.</li> </ul>	Oppose	<p>J Swap asserts that the proposed plan change is not contrary to the RMA or the District Plan, as outlined throughout the proposed plan change and particularly in section 13, pages 62-63.</p> <p>J Swap affirms the applicant's assessment that the proposal is the most appropriate way to achieve the objectives and policies of the MPDP, as is clearly outlined throughout the s32 report (Appendix C).</p> <p>The submission by Harlow Holdings Limited does not explain why it would be more appropriate for the Plan Change 57 area to be rezoned residential and/or retained as Rural Zone, therefore the submitter considers this point to be redundant. The proposal demonstrates the benefits of rezoning the site to industrial. For example, 'the industrial offering has been deliberately located along the site's frontage to Tauranga Road to enable it to dovetail with the existing industrial zoning on the land to the north and also to capitalise on the advantages that the State Highway network provides for ease of access to and from Matamata. To the east of the plan change site, the majority of the land between the existing urban environment and the site has been earmarked for further</p>	Accept Plan Change

Submitter Name	Submission Number	Relevant PC57 Provision / Topic	Submission	Support/ Oppose	Reasons	Decision Sought
					<p>residential development, being subject to a Future Residential Policy Area overlay' (section 3.1, page 11).</p> <p>J Swap notes that the remaining points raised by Harlow Holdings Limited, such as that connectivity upgrades are necessary and should be efficiently and effectively integrated with the surrounding area, can be incorporated into the plan change and do not present any barriers to accepting the plan change. The proposal already provides for connectivity upgrades in accordance with the recommendations of the Integrated Transport Assessment by Bloxam Burnett &amp; Olliver (section 7.3, pages 34-37).</p>	

## 5. COPIES OF FURTHER SUBMISSIONS

In addition to providing these further submissions of J Swap Contractors Ltd to [submissions@mpdc.govt.nz](mailto:submissions@mpdc.govt.nz), copies have been sent to the following submitters:

Submitter Name	Submission Number	Contact name	Contact details
Milestone Homes Matamata Ltd	6	Kevin Stanley	<a href="mailto:kevin.stanley@milestonehomes.co.nz">kevin.stanley@milestonehomes.co.nz</a>
Matamata Chamber of Commerce	8	Steve Edwards	<a href="mailto:steve@matamataNZ.co.nz">steve@matamataNZ.co.nz</a>
Classic Group Ltd	14	Scott Keene	<a href="mailto:Scott.keene@classicdevelopments.co.nz">Scott.keene@classicdevelopments.co.nz</a>
Waikato Regional Council	16	Joao Paulo Silva	<a href="mailto:Joapaulo.silva@waikatoregion.govt.nz">Joapaulo.silva@waikatoregion.govt.nz</a>
Barr Harris Surveyors Ltd	17	Gavin Andrew Harris	<a href="mailto:gavin@barrharris.co.nz">gavin@barrharris.co.nz</a>
Matamata-Piako District Council	20	Lachlan Pratt	<a href="mailto:LPratt@mpdc.govt.nz">LPratt@mpdc.govt.nz</a>
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