

Submission ID: 62544 **Submission Date:** 2022-11-09
16:21:17

Name (individual/organisation):

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This is a submission on Private Plan Change 57: Calcutta Farms Limited - Industrial Zone, Matamata

The specific provisions of the plan change that my submission relates to are:

refer to attached correspondence.

If your submission won't fit in the below text box, please upload a document containing your submission. Please select which method you'd like to use:

I will upload a document

My submission is:

Upload the document containing your submission here:

[636b1cadb5cb7-MPDCPlanChange57 Form5 SubmissionGAHarris.pdf](#)

I seek the following decision from Council:

Decline the plan change

Suggested amendments:

I wish to be present at the council planning hearing:

Yes

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

No

I could gain an advantage in trade competition through this submission

No

I am directly affected by an effect of the subject matter of this submission that—

(a) adversely affects the environment; and

(b) does not relate to trade competition or the effects of trade competition

Upload additional info (if necessary):

Notes:

- The submission and decision you wish Council to make should only relate to the contents of the proposed plan change
- Submissions close at **4:30pm, Wednesday, 9 November 2022.**
- Please complete and submit this form before the closing date. Physical copies are also available and should be posted to: Matamata-Piako District Council, PO Box 266, Te Aroha or emailed to submissions@mpdc.govt.nz; or you can drop it off at any Council office.
- I accept that by taking part in this public submission process that my submission (including personal details, names and addresses) will be made public. After the closing date, all submissions received will be available for public viewing.

Form 5
Submission on notified proposal for policy statement or plan, change or variation

Clause 6 of Schedule 1, Resource Management Act 1991

To: *Matamata Piako District Council*

Name of submitter: *Gavin Harris*

This is a submission on the following proposed Private Plan Change 57 to the Matamata Piako District Plan (*or plan*) (the **proposal**):

I could not gain an advantage in trade competition through this submission.

*I am directly affected by an effect of the subject matter of the submission that—

- (a) adversely affects the environment; and
- (b) does not relate to trade competition or the effects of trade competition.

The specific provisions of the proposal that my submission relates to are:

This submission opposes the rezoning of this land as a private plan change independent of an updated Matamata township development strategy, upon which the Calcutta Master Plan (used as the context to assess the current rezoning proposal) would be assessed and amended.

I oppose the allocation of wastewater capacity in the current, or future planned upgraded Wastewater Treatment Plan at Matamata, without cost/benefit analysis of other potential development area servicing options, notification of the proposed Matamata Piako Wastewater Plant upgrade works and environmental effects, which would allow analysis of the costs and environmental effects of any additional industrial area servicing to that facility.

My submission is:

While the immediate plan change proposal directly affects a 41 hectare area, the proposal is predicated on a "Calcutta Master Plan". That Master Plan covers an area of over 250 hectares on the east side of Matamata, on rural zoned land, almost entirely owned by the applicants. Of that land 19.36 hectares has already been rezoned Residential as part of Calcutta Farms Ltd Plan Change 47 objection mediated at the Environment Court.

The Master Plan proposal has not been subject to any public notification process. The applicants have understandably focused this concept on rezoning and roading connections serving the purposes of their land.

The 250 hectare Master Plan extension concept of the Matamata urban area on the east side of the existing developed township, would include an increase of close to 50% of the existing town developed footprint. That would clearly constitute a major change to the township balance and function.

The “Master Plan” proposal would effectively direct all town expansion on the eastern side of the Matamata township.

The Master Plan and current Industrial Plan Change proposal extend the urban zone approximately 3.5 kilometres east of the Matamata CBD. The current Calcutta property Residential zoning objection process under Plan Change 47 has already extended the Residential zoning 600 metres beyond the adjoining urban zoning on the south-east side of the Matamata township. In comparison to the proposed 3.5 kilometre urban expansion east of the CBD centre (assessed from around the intersection of Arawa Street and Broadway) the northern edge of the urban area extends approximately 700 metres north of the CBD, and the western edge approximately 900 metres west of the CBD. The current Plan Change proposal and associated Master Plan significantly alter the “balance” of the urban area around the existing CBD.

Matamata has existing traffic issues on the main Broadway throughfare that have increased, in particular, over the past decade (exacerbated by tourism increases and the satellite commercial centre on the northern side of the town). The previously designated future town bypass on the northern side of the township has lapsed. There is no alternative future development bypass roading strategy within the District Plan for the township.

The Calcutta Master Plan addresses internal roading proposals providing potential local connectivity proposals. There is no existing overall connectivity strategy for the township assuming this extent of development on the east side of the township. If no overarching plan is provided, and the development proceeds as a series of independent plan changes, the options for addressing the Matamata transport issues will be further reduced.

The analysis in Section 4.2.1 of the Plan Change application argues for inefficiency in delaying the plan change proposal. That is based in part on the Industrial land availability and projected demands in the ME Consultants report. The analysis in that report identifies approximately 11.0 hectares available in Matamata, and 2.4 hectares available in Waharoa as at 2021. Matamata and Waharoa are separated by approximately 4.5 kilometres and are serviced from the same wastewater treatment plant. Labour mobility between the townships is high.

The ME Consulting report is interpreted as identifying that there is a proposed shortfall of approximately 6.1 to 10.1 hectares in Matamata, and 1.3 to 2.1 hectares in Waharoa by 2031, or 11.9 hectares to 19.1 hectares in Matamata, and 2.6 hectares to 6.1 hectares in Waharoa by 2041 (table 5.2). It identifies approximately 11.0 hectares of available Industrial land at Matamata and 2.4 hectares available Industrial land at Waharoa as at 2021 (table 4.1).

The ME Consulting report does not take into account the Industrial subdivision completed at Dunlop Road creating Mowatt Street at the north side of Waharoa. That land has a land-use consent that provides for Light Industrial land-use. There is approximately 16 hectares of undeveloped Industrial land available in that development excluding the stormwater attenuation/treatment reserve.

Following resolution of SH27 status matters, a private plan change for that area to Industrial zoning was proposed to replace the initial site specific land-use consent for light industrial activities. MPDC Planning staff encouraged that plan change proposal to be delayed and incorporated in the Settlements Plan Change. The Waharoa Settlement Plan change has subsequently been delayed over the past decade, but is now progressing again. Based on prior indications, this property, and possibly other land on the west side of Waharoa, is to be addressed in terms of Industrial zoning in that plan change.

The land at Mowatt Street is served for water, electricity and telecommunication services. The lots that are under 3 hectares in area are served by a piped stormwater system including water quality treatment, with the 2 larger sites subject to on-site mitigation. Prior enquiry has been made as to the options to connect this development via pumped sewer system to the rising main in Dunlop Road. MPDC could provide for this additional area of Industrial land with wastewater servicing without any further impact on the high quality soil land resource.

The inclusion of the above land in the available industrial land assessment, combined with the existing land identified as available within the ME Consulting Report, would appear to meet the projected demand through to 2041. The benefits of promoting Industrial activity in Waharoa and that local community will be addressed as part of the current Waharoa Plan Change proposal.

The above land availability would indicate there is sufficient time to enable the wastewater treatment plant upgrade proposals to be made available and addressed as any proposal including the new Industrial area rezoning. Similarly an updated Matamata township development strategy could be prepared and consulted on so that the context the Industrial Plan change is assessed within, is based on wider Matamata township consideration.

The Plan Change proposal identifies preferred disposal to the upgraded Matamata WWTP. The preference for that disposal option is understandable, and the application notes the currently zoned land is expected to utilise any existing available WWTP capacity in priority to the proposed rezoned land.

The wastewater demand assessment in part 5.2 of the Calcutta Farms Ltd Infrastructure Report is based on wastewater demand assessed on employee numbers per hectare (per RITS) i.e. excluding trade waste associated with high output Industrial activities e.g. dairy factories.

Potential options for the WWTP upgrade may include pumped discharge to achieve improved dilution at the discharge point. As a property owner adjoining the Waihou River it

is not possible to assess potential effects or cumulative effects without WWTP upgrade detail.

The cumulative effect of new residential, commercial and industrial development areas on the WWTP upgrade requirements cannot be practically assessed without that information.

The comparative cost/benefit analysis of servicing of future public wastewater servicing of new areas (including for example the Waharoa Industrial development at Mowatt Street) should then be considered on a wider basis, rather than assumption it would apply first (after the existing zoned areas) to the proposed rezoned land in this application.

Prior to any further rezoning of land within the Matamata area proposals or options for the WWTP upgrade should be provided and published for consultation, as this affects the wider Matamata area. The standard of treatment, discharge methods and location, are critical to assessment of the wastewater capacity and environmental impacts of the current rezoning proposal, and cumulative effects on the WWTP upgrade options, costs and discharge impacts.

The recently issued National Policy Statement on Highly Productive Land (NPS HPL) will in all probability significantly limit the areas of land surrounding the existing urban area Matamata Piako District Council can justify taking out of production land use.

A potential advantage to MPDC of the current Plan Change 57 proposal is that it is understood notification pre dates the issue of the NPS HPL, and provides options for urban expansion without the additional constraints of the NPS HPL. Notwithstanding the current proposal, future urban expansion of the township (including the areas in the Calcutta Master Plan) will be subjected to the NPS HPL and effectively competing criteria of the National Policy Statement on Urban Development. An updated and well planned township development strategy would aid the case for future expansion under the NPS HPL Section 3.6 (4) (applicable to Tier 3 Territorial Authorities) in a manner providing optimal benefit to the Matamata township.

This submission seeks input on both the zoning proposal and General Industrial Zone rule concept. The submissions on the General Industrial Zone rules would be affected by the wastewater roading strategies, and the wider development concept (i.e. Calcutta Master Plan, or preferably revised Comprehensive Town Development Strategy).

I seek the following decision from the local authority:

Decline or halt the proposed rezoning process, until a wider town wide development strategy, and wastewater management plan is available to assess the proposal in a planned context.

*I wish to be heard in support of my submission.



Signature of submitter

(or person authorised to sign
on behalf of submitter)

Date: *09 November 2022*

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