

Your Reference :

Our Reference : 220859

9th November 2022

Matamata-Piako District Council
PO Box 266
Te Aroha 3342

Email: submissions@mpdc.govt.nz

Dear Sir/Madam,

SUBMISSION ON PRIVATE PLAN CHANGE 57

The following submission is made on behalf of Fonterra Farm Source in relation to Calcutta Farms Limited Private Plan Change 57 to rezone Rural zoned land to General Industrial Zone in Matamata.

This submission is lodged in response to the Public Notice dated 11 October 2022. This submission generally supports Private Plan Change 57, seeking that Council accept the plan change with amendments. The submission is attached as Appendix A to this letter.

Yours sincerely,



Sarah Davidson
Senior Planner

APPENDIX A

**SUBMISSION ON PRIVATE PLAN
CHANGE 57**

UNDER THE RESOURCE MANAGEMENT ACT 1991

Form 5

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

To: Matamata-Piako District Council
PO Box 266
Te Aroha 3342

Name of submitter: Fonterra Farm Source

This is a submission on the Private Plan Change 57 to the Operative Matamata-Piako District Plan requested by Calcutta Farms Limited that seeks rezoning of approximately 41 hectares of land on the southern side of State Highway 24, Matamata from Rural Zone to General Industrial Zone in conjunction with a Development Area Plan.

Fonterra Farm Source could not gain an advantage in trade competition through this submission. The effects raised in this submission do not relate to trade competition or the effects of trade competition.

The specific provisions of the proposal that this submission relates to and the decisions that are sought from Council are detailed on the following pages.

1. INTRODUCTION

- 1.1. Fonterra Farm Source welcomes the opportunity to make a submission on Calcutta Farms Limited Private Plan Change 57.
- 1.2. Fonterra Farm Source operates a network of over 65 Farm Source stores throughout New Zealand. Fonterra Farm Source offer services and support to local farming communities and operate as a retail farm supply store for farmers and the wider public.
- 1.3. Fonterra Farm Source supports the direction of Plan Change 57 subject to the amendments that are outlined in this submission below.

2. SECTION 32 EVALUATION

- 2.1. Fonterra Farm Source agrees there is an established demand/shortfall in future industrial land in Matamata in the medium to long term and the rezoning of the Calcutta Land will address the shortfall in part and provide additional capacity.
- 2.2. Fonterra Farm Source supports Option 3 under the Section 32 Analysis. Matamata services a large rural population and there is a shortfall of appropriately zoned land that provides for rural retail activities. These activities are often not suited to town centre or commercial zones where land is often smaller in size and difficult to provide for rural retail activities. Rural retail activities often feature larger sized buildings and require larger parking areas for heavy vehicular traffic and longer vehicles. Such activities also often require larger yard areas to store agriculture equipment.
- 2.3. Fonterra Farm Source agrees with the findings of the Economic Report submitted in support of the plan change and the peer review, noting the National Policy Statement on Urban development (NPS-UD) requires Council's to apply buffers under Future Proof Frameworks. These buffers have not been applied to any Future Proof Framework in Matamata-Piako District and applying such buffers are likely to further illustrate the shortfall of industrial zoned land in Matamata.
- 2.4. Fonterra Farm Source agrees with the peer review assessment undertaken by Property Economics in Section 4 on retail distribution effects. Trade activities such as rural retail activities are often located on the fringe of townships rather than town centres due to size requirements. These activities do not result in the redistribution of retail activity from town centre zones due to their trading nature rather than retail nature.

3. PROPOSED AMENDMENTS TO THE MATAMATA PIAKO DISTRICT PLAN

- 3.1. Fonterra Farm Source supports the proposed addition of New Section 18 to the Matamata-Piako District Plan with some minor amendments as outlined in Table 1 to give recognition to activities that are compatible with industrial activities such as rural supply stores.
- 3.2. Fonterra Farm Source supports the proposed changes to the Matamata-Piako District Plan contained in Part C.2 of Appendix A.

DECISIONS SOUGHT BY FONTERRA FARM SOURCE ON PLAN CHANGE 57

The decisions sought by Fonterra Farm Source to the text of Plan Change 57 are shown in **red text** with deletions **struck-out** and additions **underlined**.
For avoidance of doubt, Fonterra Farm Source submits in support of all other Plan Change 57 provisions as notified.

Table 1: Proposed Fonterra Farm Source Amendments to the text of Plan Change 57

Page Number	Provision	Support/Oppose	Reason for submission	Decision Sought
2	18.1 General Industrial Zone Issues	Support	Fonterra Farm Source generally supports the purpose of the General Industrial Zone (GIZ) and the identification of issues. Recognition should be made for wholesale retail and trade suppliers given this type of retail activity is proposed to be permitted under GIZ-R1(1).	The purpose of the General Industrial Zone (GIZ) is to provide for a range of industrial activities which have a low impact on water and wastewater services, with provision for some activities that support industrial activities and/or activities that are compatible with the adverse effects generated by industrial activities. This includes providing for cafes, yard-based retail, <u>wholesale retail and trade suppliers</u> and building improvement centres. The GIZ land is generally located adjacent to our towns to meet growth requirements. Where this land is situated is at one of the entries to a town it requires greater design standards to ensure the amenity of the town is maintained and enhanced
18.3 General Industrial Zone Objectives				
2	GIZ-01 Industrial activities are able to establish and operate within the zone in an efficient and effective manner.	Support	Fonterra Farm Source generally supports this Objective, but it applies to industrial activities only. The purpose outlined in Section 18.1 notes the purpose of the General Industrial Zone (GIZ) is to provide for a range of industrial activities which have a low impact on water and wastewater services, with provisions for some activities that support industrial activities and/or activities that are compatible with the adverse effects generated by industrial activities. Fonterra Farm Source	GIZ-01 Industrial activities <u>and ancillary activities that support and/or are compatible with industrial activities</u> are able to establish and operate within the zone in an efficient and effective manner.

			seek to amend this Objective to recognise supporting and compatible activities within the General Industrial Zone can be established in an efficient and effective manner.	
18.8 Principle Reasons				
12	GIZ-PR1	Support	Fonterra Farm Source supports this principle reason with inclusion of recognising wholesale and retail trade suppliers as often these types of retail activities are not suited to town centre or business zones and are proposed to be provided for under the General Industrial Zone.	It is important that Industrial zoned land is retained for industrial activities. Most retail and commercial service activities are anticipated to occur within the town centres/business zone, in order to support existing businesses, and the continued vibrancy of the existing business areas. However it is anticipated that some retail activities, such as yard based retail, <u>wholesale and retail trade suppliers</u> and building improvement centres could locate within the GIZ, as it is not practical, nor an efficient use of land for such industries to locate within the town centres/business zone.

4. DECISIONS SOUGHT

- 4.1. Fonterra Farm Source wishes the Consent Authority to approve Private Plan Change 57 subject to the amendments in Table 1.

5. WISHES TO BE HEARD

- 5.1 Fonterra Farm Source does not wish to be heard in support of this submission.



Sarah Davidson
Senior Planner Assoc. NZPI

9 November 2022

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