

Plan Change 57

Submission by Andrew Holroyd

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I oppose the Plan Change and submit that Plan Change 57 is declined.

The reasons for my opposition to the Plan Change are described below.

I wish to speak to my submission at the hearing and I may expand on my submission.

The consent application is for approximately 40 hectares of industrial land, but the application states that the zoning of the industrial land gives effect to the other 200 plus hectares of mixed-use development in the overall Master Plan. The infrastructure report by Bloxam Burnett and Oliver (BBO) also identifies the 250-hectare area as part of the overall structure plan. This area of development will significantly impact the whole nature of Matamata and directs all future development into one area with a single landowner. I find this very concerning as the area indicated will not provide balanced expansion or balanced benefit for the Matamata township as a whole.

Development round the fringes of Matamata provides a better concept and ability to improve existing infrastructure during development.

The Property economics review of the ME consulting report noted that sections 7.2 and 7.3 of the ME report provided support for the consistency with Matamata's spatial structure as compared to other industrial nodes in the district. The ME consulting report on the available industrial land within Matamata Piako District does not include the 20 ha of land at the northwest side of Waharoa (Dunlop Road and Mowatt Place), which has a light industrial land use consent over it, and has been earmarked for a plan change by MPDC to industrial land for over 10 years. Waharoa has approximately 15 hectares of available land that is serviced for road access, water, power, and telecom, but not built on. Approximately 7 hectares requires stormwater mitigation while approximately 8.5 hectares of the 15 hectares is reticulated to a consented stormwater discharge. A further 3.0 hectares approximately is currently developed. This land has a sewer rising main running along the eastern boundary along Dunlop Road connected to the MPDC wastewater reticulation in Matamata. Prior to additional industrial land in Matamata being zoned industrial, MPDC should rezone the light industrial land in Waharoa, which is only constrained by the provision of wastewater disposal. This existing partially developed land would complement the industrial land in Matamata and Waharoa.

I would also like to submit on the infrastructure effects and review, looking at the areas individually.

Transportation

I note that although the transportation section deals with the internal roading network, there is no assessment in terms of the NZTA requirements for the Banks Road intersection which the overall Plan area identified as being given effect to with this rezoning. This is a known concern and issue with the future development areas adjacent to the overall vision and indicative Masterplan.

The new industrial area is expected to generate additional heavy vehicle traffic. However, there is no consideration or assessment of the bridge on SH 24 with regards to heavy vehicle passage. The bridge over the Mangawhero Stream has for some time been an issue when two heavy vehicles approach the bridge from different directions and often requires one of the heavy vehicle to stop as the two heavy vehicles struggle to pass on the bridge itself.

Water

The assessment of the water quality notes the high levels of manganese and iron in the bore water. MPDC have long known about the potential to abstract water from the aquifers surrounding Matamata.

To date MPDC have generally not taken advantage of the natural aquifers round the township to manage the water demand due to the high levels of Manganese and Iron found in the majority of bores. MPDC have previously considered the treatment required to remove these two impurities to an acceptable level was not viable. My understanding is that previously MPDC considered that these contaminants could adversely affect the performance of the existing supply quality if the water takes were included into the town supply.

A risk/cost/benefit analysis precluded the use of water contaminated with high levels of Manganese and Iron.

The water takes granted to Calcutta Farms are not for domestic use and I note that the consents expire in 2028, 2029 and 2030. The consent for the proposed bore to be transferred expires on 1 March 2029.

This does not provide MPDC with a transfer of a consent that provides a security of supply for an area being rezoned. The consent would need to be for a period of at least 25 years to provide MPDC with the security of supply required and MPDC would have to apply for a water take for domestic purposes.

Given that the water takes are a granted consent, rather than an acquired asset, it does not seem appropriate that notwithstanding the fact that Calcutta Farms may not fully utilize the water take for the granted purpose (agricultural purposes), that the water take consent would effectively be implied to be a right they would provide to MPDC for a purpose the consent was not granted. As the natural state water is not, with some limited exceptions, a private asset justification for the volume of water take for the proposed new use should presumably be assessed in terms of any competing uses, as part of the new consent proposal.

Stormwater

The concept design for the stormwater effects from the development have been assessed by BBO in Appendix D. BBO note that a stormwater discharge consent may be required in section 2.4.

The description of the land in the stormwater section is *"The project's catchment lays within the flat floodplain area east of Matamata and is located within the Mangawhero Stream's general."*

The term *"flat floodplain area"* does not appear to be the case and suggests that the land is liable to flooding. The land in question is elevated approximately 18 metres above the Mangawhero Stream

and its flood extents. The land would I believe be better described as free draining pastoral land elevated from the Mangawhero Stream. This description fits better with the last sentence of the description being *"The predominant soils are sands, sandy silts, with a topsoil layer that consists of dark brown sandy silts with high concentration of organics, typical for agricultural lands."* The stormwater philosophy and the modelling demonstrates compliance with the various requirements and provides a good solution. However, the use of the wetlands in the elevated permeable soils is likely to be difficult to establish and maintain a constant water level.

I also have concerns over the location of the last wetland at the head of the existing gully. I have seen instances where ponding water at the head of a gully like this has caused slips to occur in the face of the gully due to infiltration passing into the permeable soils and causing erosion where the seepage exists the bank.

The use of the wetland areas for an overland flow path is commended and provides a route for extreme events to discharge to the Mangawhero Stream from the industrial area. Since this is the initial stage of a concept Masterplan, which extends to the existing urban area it would be reasonable to design the overland flow path to cater for the upstream catchment to the existing town boundary.

During the development of Maea Fields development an overland flow path protected by a consent notice has it is understood been partially filled. The Maea fields development effectively cut off a portion of the existing urban area from a potential overland flow path to the Mangawhero Stream, or at a minimum possible storage for extreme events. It is important to provide not only the land being developed but the existing developed urban land with an overland flow path to the Mangawhero Stream to protect the existing urban area from the effects of increased rainfall events.

During the Plan Change 47 proceedings I highlighted the options for overland flow paths from the existing urban areas in the east of Matamata. It is disappointing that development has been allowed to progress without providing for the existing urban area to benefit from overland flowpath /storage proposals identified via consent notice and easement prior to development. In projects that I have been involved with I have progressed the philosophy of extending swales from existing overland flow paths to create a route for extreme events.

I believe that prior to consenting this Plan Change area a discharge consent to the Mangawhero Stream should be obtained from Waikato Regional Council, which include the provision for an overland flow path to protect existing urban areas that could discharge to the Mangawhero Stream from the existing urban development and in particular the land to the west, south and north of the Calcutta Farms "Maea Fields" development. The consent notice, which extends from the "Longlands Lifestyle Retirement Village" area to the Mangawhero Stream is I understand still recorded on the subject titles. I note that the provision of legally recorded overland flowpaths is an identified criteria of the MPDC Development Manual 2010 and associated Stormwater Management strategies.

I request that prior to any further rezoning in this part of Matamata a Stormwater Discharge consent is obtained from Waikato Regional Council including a Comprehensive Stormwater Catchment Management Plan is provided for the area between SH24/Mangawhero Road, Burwood Road and Banks Road.

The Comprehensive Stormwater Catchment Management Plan is provided for the area between SH24/Mangawhero Road, Burwood Road and Banks Road. The Catchment Management Plan should include overland flow paths for the existing and future development, as well as a stormwater philosophy, which includes disposal to ground for stormwater recharge. It is noted

that there are areas that the applicant does not own and that some areas could discharge to the existing overland flow path on the northern side of SH24/Mangawhero Road.

Wastewater

The infrastructure report by BBO provides three options for wastewater disposal of which option 2 has been abandoned. This leaves two options being option 3 for on-site wastewater disposal and option 1 for disposal to the MPDC Wastewater Treatment Plant.

Option 1 is the preferred option, which I agree with. However, I do not agree with the proposal to provide a short-term fix with a modular system. MPDC has required an upgrade to the Matamata WWTP for in excess of 10 years, with additional works including a membrane installed over 10 years ago. During the Plan Change 47 process for Matamata the area of land rezoned was tagged with areas indicated as future residential due to the capacity constraints of the WWTP.

Prior to any rezoning a comprehensive plan for the WWTP upgrade for Matamata and Waharoa is required. Funding an ad hoc modular system as the upgrading plan for the WWTP for the whole of Matamata and Waharoa is not an acceptable solution. Developers who own the future residential land zoned under Plan Change 47 have not been given this opportunity.

MPDC have indicated for several years that the upgrading of the WWTP is being progressed and that development is constrained by the capacity of the WWTP.

Approximately 15 years ago MPDC added the membrane filters to the original oxidation ponds and now it is very evident that the continued use of an oxidation pond has a limited capacity. It is time that MPDC invested in a modern WWTP, which would have a smaller footprint and provide a better quality of effluent discharge. This treatment plant should be designed for the future of Matamata and Waharoa in mind. Other areas trying to develop in Matamata have not been able to develop due to the WWTP constraints.

Prior to any further rezoning of Land within the Matamata area a comprehensive plan for the WWTP should be provided and published for consultation as this affects the whole of Matamata. The standard of treatment, discharge methods and location are critical to assessment of the environmental impacts of the current rezoning proposal and cumulative effects on the cost and effects of the WWTP upgrade costs and discharge impacts.

Landscape effects

On the fringe of the development there is no assessment in terms of the existing pin oak trees along the southern boundary of SH24. Over 10 years ago local residents of Matamata and businesses collected the funds to move the power lines from the SH 24 corridor onto the rural land. The local residents paid to move the power lines to keep the landscape appeal of the pin oaks along the entrance to Matamata to better enhance the appeal of Matamata. Placing industrial buildings behind the power lines will detract from the natural appeal of the trees and the landscape entering Matamata.

In comparison the land to the north of SH 24 has been industrial for some time and the open pasture to the south is a significant feature of the Matamata approach from the east. The general public who

funded the retention of the pin oak trees along SH 24 should in my opinion have been directly consulted about the Plan Change.

There has been no opportunity for public assessment or consultation on the overall development strategy outlined in the Calcutta Master Plan, other than the opportunity to submit on the current plan change by public notification.

The wider ramifications of the Masterplan by Calcutta Farms should I believe had open public meetings to make the general public aware of the extensive nature of the Master Plan concept the current proposal is based. That is considered relevant as that is the context the rezoning is being assessed within in the application assessment of effects.

Regards



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