

Before an Independent Hearings Panel

The Proposed Waikato District Plan (Stage 1)

IN THE MATTER OF the Resource Management Act 1991 (**RMA**)

IN THE MATTER OF hearing submissions and further submissions on the Proposed
Waikato District Plan (Stage 1)

**OPENING LEGAL SUBMISSIONS ON BEHALF OF HAVELOCK VILLAGE LIMITED AND
TATA VALLEY LIMITED**

26 September 2019

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MAY IT PLEASE THE COMMISSIONERS

1. OVERVIEW

- 1.1 These submissions are filed on behalf on Havelock Village Limited¹ (**HVL**) and TaTa Valley Limited² (**TVL**).
- 1.2 HVL and TVL provided comprehensive submissions on the Proposed Waikato District Plan (**PWDP**) supported by detailed technical analysis relating to two separate but adjoining sites near Pokeno. HVL seeks to rezone land adjoining the existing urban area of Pokeno to the south from Rural to Residential (the **Havelock site**). TVL seeks to rezone land to the south west of Pokeno from Rural to a bespoke Resort Zone (the **TaTa Valley site**). Both submissions sought other consequential changes to the PWDP to implement the proposed developments.
- 1.3 The purpose of these submissions is to introduce the Hearing Panel to the development proposals that TVL and HVL are seeking to advance through the PWDP hearing process. They also provide the background and context for the substantive submissions and evidence to be presented in the later hearings.
- 1.4 Pokeno is acknowledged as a rapidly growing town which is subject to increasing growth pressure due to its proximity to Auckland. It has been ear-marked for both further residential development and economic growth. TVL and HVL provide comprehensive developments that support both of those objectives.
- 1.5 TVL is seeking to develop and operate the TaTa Valley Resort (**Resort**). The vision for the Resort is to create an example of New Zealand rural living where visitors can relax, explore and be entertained with a variety of attractions. It will encompass a hotel with associated restaurant, spa and conference spaces. It will also include tourist attractions such as a farm park, a New Zealand Made hub to showcase local and regional products, and outdoor recreation opportunities connecting to the Waikato River. As part of that development, TVL also wish to provide a visitor ferry service running along the Waikato River from a proposed satellite site in Mercer to its main TaTa Valley site in Pokeno.
- 1.6 Given the limitations of the existing rural zone and the nature of the Resort activities proposed, a bespoke zone is sought for the TaTa Valley site, with site specific provisions and a masterplan to complement development. To enable this

¹ Submitter 862.

² Submitter 574.

development, TVL also has a number of resource consent application packages underway, which tie into its re-zoning request. These are described further below in section 5.

- 1.7 HVL is seeking to enable a comprehensive and integrated residential development on the Havelock site which sits between the existing Pokeno town and the TaTa Valley site. Havelock will provide for a new neighbourhood of Pokeno to the south west of the town centre unlocking direct access for the community to the Waikato River and providing for up to 1025 new homes, along with a small local centre.
- 1.8 A masterplan is proposed to guide development and provide for individual development precincts that respect the natural land forms and respond to topographical and geotechnical constraints. That plan also seeks to protect high value areas as far as possible and provide new reserve areas and recreational connections throughout the site. HVL seeks a number of changes to the PWDP to enable development of Havelock.
- 1.9 While each development can proceed on its own, the location of Havelock and the Resort adjacent to each other provides an unprecedented opportunity to link Pokeno to the Waikato River and enhance the community's relationship with the River. The combined development will provide for a roading, walkway and cycle network from the edge of the existing town to the River.
- 1.10 There are also potential infrastructure efficiencies if the two proposals are developed together, but each proposal has been designed to proceed separately if required. **Appendix A** shows the location of the two sites.

2. SCOPE OF THESE SUBMISSIONS

- 2.1 The submissions will address:
 - (a) GMP and its vision for the TaTa Valley Resort and Havelock;
 - (b) The TaTa Valley site and proposal;
 - (c) The changes sought to the PWDP to provide for the TaTa Valley proposal;
 - (d) Key issues to be addressed in relation to TVL's submission;
 - (e) The Havelock site and proposal;
 - (f) The changes sought to the PWDP to provide for Havelock;

- (g) Key issues to be addressed in relation to TVL's submission;
- (h) Plan wide issues; and
- (i) Conclusion.

3. TATA VALLEY, HAVELOCK, GMP AND THEIR VISION

- 3.1 GMP is a leading privately-owned New Zealand and Australian based manufacturing company specialising in complementary healthcare products. GMP has over twenty years' experience servicing the nutritional and health food industry worldwide. It operates in both the Australian and New Zealand markets, with over 1,000 employees. The development of both of these projects is backed by GMP Pharmaceuticals (**GMP**).
- 3.2 GMP's customers around the world have expressed an interest in New Zealand and, the opportunity to see where the raw materials in GMP's healthcare products come from. The vision for TaTa Valley has therefore been sparked by customer interest and demand. There is currently nowhere in New Zealand that offers a fully immersive experience where people can see different raw materials turned into finished products in a tourist friendly manner or setting. The development proposed by TVL (backed by GMP) is intended to provide for this opportunity. To complement this tourist destination a resort, restaurant and conference facilities are proposed.
- 3.3 Pokeno's location was a major draw card for GMP when considering this investment. Its proximity to Auckland International Airport, Auckland City Centre, and other major cities such as Hamilton, Tauranga, Rotorua and Taupō, provides a geographical advantage to attract visitors and promote regional and national tourism. The rural setting and access to the Waikato River are also key attributes of the site. GMP considers that Pokeno is the ideal location to invest for the long-term.
- 3.4 GMP through TVL will be partnering with leading NZ manufacturers to showcase their products and industry leading manufacturing techniques at the farm park or NZ Made Hub. TVL is considering partnering with Fonterra, Mercer Cheese, Fiordland Lobsters, Comvita, Villa Maria, Zespri and Dairy Goat Corporation in the NZ Made Hub to showcase their products. In developing its proposal, TVL has also consulted with local key stakeholders, such as Mana Whenua groups, neighbouring residents and local community groups. This consultation has been constructive and is ongoing.

- 3.5 As part of TVL's plans for the Resort to become one of the Region's leading tourism destinations, it has an active land acquisition programme to allow for expansion opportunities. It already controls significant landholdings in the Pokeno area and is continuing to explore opportunities for further expansion.
- 3.6 TVL is committed to supporting the local Pokeno community, not only in terms of its capital investment, job opportunities and visitor attractions, but also through more localised community initiatives including the use of its land and facilities by the Pokeno Markets, Local 4WD Club and the Mercer and Manukau Rowing Clubs. It is also investigating opportunities for involvement with other tourism activities and operators in North Waikato, from museums to shuttle services, Bed and Breakfasts, jet boating and sky diving.
- 3.7 As part of its land acquisition programme, GMP through its development company, HVL, has acquired significant land holdings between Pokeno and the Resort site. Havelock's vision is to provide for a comprehensive residential development adjacent to Pokeno's existing urban centre.
- 3.8 HVL strongly supports the ongoing growth and development of Pokeno and seeks to create a new residential neighbourhood to the south of Pokeno through the rezoning of the Havelock site. The additional population will assist to improve the economic and social vitality of Pokeno. It will provide additional residential land which will promote more affordable houses and housing choice. In addition, the proposed new neighbourhood centre will provide a range of amenities and commercial services to cater for the needs of the local community.

4. LEGAL DECISION-MAKING FRAMEWORK

- 4.1 We have reviewed the Council's opening legal submissions and generally agree with their summary of the applicable statutory decision-making framework and relevant legal principles.

5. TATA VALLEY RESORT

Site overview and context

- 5.1 The TaTa Valley site at 242 Bluff Road³ and 35 Trig Road and 278 Bluff Road is currently zoned rural and used for low intensity grazing. It is located approximately 2km to the south west of Pokeno. The Waikato River flows along the site's southern

³ The site's main access is currently 42B Potter Road

boundary and the remaining boundaries of the site are bounded by steep slopes up to Potter and Bluff Roads. Much of the site comprises flat low-lying river terrace located within a chain of steeper hill country. These steep cliffs and ridgelines combined with tall stands of trees naturally screen the site, which has a limited external visual catchment.

- 5.2 The TaTa Valley site is primarily accessed via Whangarata, Ewing and Potter Roads and is currently unserviced. There is currently no public access to the River. The site comprises a mix of exotic and native vegetation, scrub, pasture and wetland habitat which have been grazed by stock. There are areas of the site with high ecological value, especially near the River. Parts of the site have been identified as having significant landscape value in the PWDP but TVL's experts do not share this view.
- 5.3 The land surrounding the TaTa Valley site is a working rural landscape, characterised by intensive farming with small land holdings. There are also some well-established rural living and lifestyle block developments in this area. The predominant land uses in the area are pastoral farming and cropping uses (horticulture with some large glasshouses). To the west of the TaTa site is a water supply and treatment facility owned by Watercare Services Limited.

Overview of TaTa Valley development

- 5.4 As outlined above, TVL plans to develop the site into a major tourism destination, known as the TaTa Valley Resort. It will offer a wide range of tourist attractions and activities not currently offered in a single location in Auckland or the North Waikato. It will serve a range of international and domestic tourists and has the potential to be a unique and land mark destination in the North Waikato. Key activities proposed onsite include:
- (a) A tourism resort including a range of activities such as hotel accommodation, a conference centre, spa and restaurant activities;
 - (b) Farm showground and NZ made hub (to provide local New Zealand brands with the opportunity to showcase their products);
 - (c) Outdoor recreation activities;
 - (d) Restored wetland areas and indigenous planting; and
 - (e) A ferry landing on the banks of the Waikato River to connect to a landing at Mercer.

- 5.5 The Resort will support the local community in Pokeno and Tuakau through significant capital investment, creating permanent jobs, and attracting visitors to the area.
- 5.6 The proposal also involves a significant wetland restoration and planting programme, which will see the planting of native species and the restoration of wetland habitat also planted with indigenous species. Onsite stormwater treatment (separate to the wetland system) is also proposed which will significantly improve the quality of the stormwater runoff currently being discharged from the site to the Waikato River.

Resource consents and consent applications underway for TaTa Valley

- 5.7 TVL has prepared a master plan for the site to support its vision and is actively pursuing the development of that plan. This is attached as **Appendix B: TaTa Valley Master Plan**.
- 5.8 TVL has already obtained resource consents for some of the enabling works required to implement its master plan, including bulk earthworks consents for construction of the hotel building platform and access roads as well as earthworks for geotechnical testing which is underway.
- 5.9 It has also lodged resource consent applications with the Waikato Regional and District Councils for the resort activities (RC1), indigenous wetland (RC2), NZ Made hub and farm showground area (RC3), the river landing area (WDC) (RC4a), and site wide works.
- 5.10 More recently, it has lodged applications seeking Regional and District Council consents to construct jetty and pontoon structures to operate a ferry service on the Waikato River between Mercer and Pokeno. This ferry service will be supported by a satellite site by the River at Mercer.
- 5.11 The TaTa Valley proposal has been the subject of considerable discussion with Waikato District Council (**WDC**), Waikato Regional Council (**WRC**), and the relevant Mana Whenua groups over the past two years and has been publicised in the wider community. In general, there is support for the proposal.
- 5.12 To support its design process and inform its consent applications, TVL has also commissioned a broad range of technical expert assessments. The various technical reports that have been prepared are listed in **Appendix C**.

5.13 TaTa Valley's PWDP submission seeks a rezoning proposal to complement the Resort and tourist-related activities sought via the consent applications. The site-specific zone will provide an appropriate planning framework for its intended use and allows for integrated and long-term planning of the entire site. This will give confidence to TVL for its ongoing operational requirements and provide visibility for the community as to how the site is intended to operate and the areas of value on site that TVL plan to preserve.

Overview of changes sought to plan provisions

5.14 TVL, in close consultation with its expert team, has prepared an indicative precinct plan with three key development precincts, Significant Natural Areas (**SNAs**) and an indicative road layout. This precinct plan has provided the framework for the plan provisions now sought. The principal changes sought to the PWDP are:

- (a) Amendments to Chapter 1 to recognise that productive rural activities can also provide important opportunities for rural tourism, which showcases rural character and promotes the rural environment. TVL has filed evidence addressing this matter for *Hearing 1: Introduction*;
- (b) Rezoning the site to the south-west of Pokeno from Rural to a site-specific Resort Zone to provide an appropriate planning framework for the ongoing operation and development of the Resort. TVL anticipates that it will address the appropriateness of these new zone provisions at *Hearing 25: Zone Extents*;
- (c) The proposed zone is site specific and self-contained including objectives, policies, rules and assessment criteria to complement the proposed Resort development, recognising areas of high natural value, and providing for the ongoing operation of the Resort. A precinct plan is proposed that will identify appropriate areas for development and areas for protection and restoration. The indicative precinct plan is attached as **Appendix D**. As a result of design refinements made through the current consenting processes, it is likely this indicative precinct plan will require updating. TVL anticipates that it will address these issues and any design refinements at *Hearing 25: Zone Extents*;
- (d) Deletion of the Significant Amenity Landscape (**SAL**) identified on TVL's site in the PWDP. The assessments undertaken by TVL's experts indicate that there

are insufficient landscape and amenity values to merit identifying the site as a SAL. TVL anticipates that it will address this issue at *Hearing 22: Natural Environment*;

- (e) The proposed Resort Zone will contain a bespoke approach to the protection and management of biodiversity on site. The precinct plan identifies part of the site as a SNA. Wildlands Consultants have also identified a number of other areas that have high ecological value. All of these areas are identified on the precinct plan. The precinct plan also identifies where some of those areas will need to be modified in order to allow development on parts of the site. Other parts of the site are identified for ecological restoration, enhancement or protection in order to balance the loss of other ecological values. The proposed plan provisions for the Resort Zone have been designed to facilitate that outcome. Overall, TVL intends to maintain biodiversity values on the site;
- (f) In the event a site-specific approach to biodiversity is not supported, TVL has sought amendments to the plan-wide provisions relating to SNAs to provide some flexibility with respect to works in those areas subject to appropriate mitigation, off-setting or compensation. These relate to Chapters 3.2, 3.4 and related rules and would be addressed in *Hearing 22: Natural Environments*; and
- (g) There are also definition changes and consequential amendments required to accommodate the proposed zone provisions for the TaTa Valley site.

5.15 In the alternative, if a site-specific zone is not supported, TVL will be seeking a range of changes to the proposed rural zone to recognise and provide for rural tourism.

Key issues to be addressed in relation to TaTa Valley's submission

5.16 The key issues to be determined in relation to the TaTa Valley:

- (a) The appropriateness of proposed Resort Zone provisions, given the anticipated land use change, its proximity to the Waikato River and the opportunities provided by the Resort;
- (b) The appropriate framework for management of indigenous biodiversity on site;
- (c) The appropriateness of the Significant Amenity Landscape identified on the site; and

(d) Impacts on surrounding properties and rural character in general.

5.17 These issues will be addressed substantively by TVL's experts over the course of the upcoming hearing process.

6. HAVELOCK RESIDENTIAL DEVELOPMENT

Site context

6.1 Havelock is proposed as a new neighbourhood of Pokeno. It adjoins the urban areas of Pokeno to the south of the existing centre and Hitchen Road/Graham Block development area. The site is proximate to the town centre and the rail line, maintaining a compact and contained urban form. To the north east of the Havelock site is residential zoned land (Hitchen Road/Graham Block development area) that is currently being developed for lots/houses and to the north west is the existing light and heavy industrial-zoned land. To the south west of the Havelock site is the location of the proposed TaTa Resort and farm park. The rest of the site is surrounded by existing rural activities.

6.2 The Havelock Site has a varied topography and is currently used for pastoral farming activities. The highest point of the site is known as Transmission Hill where there are existing telecommunications masts. Part of the Havelock Site is the former, undeveloped Winstone Aggregates quarry.

6.3 Access to the site is currently available through Hitchen Road to the north, Potter Road to the west and Bluff Road to the south and east. A number of these roads will need to be upgraded as part of the development as well as new connections provided.

Havelock Township – site history

6.4 The Havelock Site has an interesting history and was originally envisaged to form part of the township of Havelock. As part of the government's military movement into the Waikato in the 1860s, it had planned to make improvements to the main military supply route between Drury and the Waikato River, and identified Havelock Township as the prime location for the main military base, trading station and depot. While the Township was surveyed, it was never developed as planned as a result of a decision to change the route for Great South Road, such that it bypassed Havelock

completely.⁴ Today, the only remnants of the Township are the unique allotment patterns.⁵ The proposed residential development of the Site will unlock the historic Havelock Township.

Havelock Proposal

- 6.5 HVL engaged a range of experts to assess the constraints and opportunities of the Havelock site and design a master plan that protects and respects the high value areas and maximises its opportunities. This is attached as **Appendix E: Havelock Master Plan**. This design led philosophy identified an overall concept for the site as well as a precinct⁶ for each part of the site to reflect the unique attributes of those parts and provide for a different character of development within those areas.
- 6.6 The residential development offers an opportunity to create a new coherent neighbourhood of Pokeno, supporting its expected growth. It will provide:
- (a) Up to 1025 lots, with a variety of minimum lot sizes. Given the topography, it will offer residential sites with high amenity, views and vistas not currently accessible in Pokeno;
 - (b) A new local neighbourhood centre with a range of amenities and commercial services;
 - (c) General open spaces and new reserve areas;
 - (d) Protection and enhancement of SNAs with some modification to provide transport connections through the site; and
 - (e) Walking and cycling connections.
- 6.7 HVL consulted with a number of key stakeholders and commissioned technical expert reports to assist with the design of its proposal. The various technical reports that have been prepared are listed in **Appendix F**. Many of the reports have been produced by consulting firms who have undertaken previous work within Pokeno, and so are familiar with its existing context.

⁴ Appendix F – at 7.

⁵ Background on submission site and summary of key features that have informed the masterplan – at 14.

⁶ Village, Settlement, Valley Floor, Hamlet and hidden Village.

- 6.8 These reports have driven the identification of developable areas, helped formulate responses to the site context and, informed the proposed Havelock plan provisions. It is expected that this technical work will evolve through detailed design.
- 6.9 The output of these expert assessments is the Havelock Masterplan, supporting precinct plan, and precinct guidelines. The masterplan will guide the development process, ensure potential effects are well managed, and create a unique character for this part of Pokeno. It identifies several precincts with different characteristics (i.e. location, lot sizes and densities), which have been designed to take into account factors such as topography, geotechnical constraints, location and special site features.
- 6.10 Special features within the site including Potter Hill, Transmission Hill and the ridgeline are identified. There are indications that there may be a pa site in the area known as Transmission Hill. The presence of the pa site has been identified as an archaeological feature to consider during development, and the indicative location of this site has been incorporated in the Masterplan design, with these features strategically located in proposed reserve areas to be protected. This can be further investigated as development progresses.
- 6.11 The Urban Design report from Construkt Architects summarises the expected outcomes and design rationale of Havelock as:⁷

High quality community living will be achieved through well-designed dwellings, attractive streets, varied open spaces and visual amenity. Following place making principles the design will embrace the authentic and complex landscape features of the site, shaping a unique community character. The proposal will enhance Pokeno through the provision of improved links to the countryside, new public green amenity, local retail and look out areas. Furthermore, due to the close proximity and connection to Pokeno Town Centre and the Industrial Zone under construction, it will help support the existing services and facilities.

Broader context and benefits

- 6.12 Pokeno has been the subject of a number of growth strategies over the past few decades and the population and spatial extent of the town has consistently met or exceeded its anticipated size at each step. The town is popular and growing rapidly. Major industrial investment has occurred and is ongoing. This reflects Pokeno's ideal

⁷ Havelock Village original submission, Appendix E Construkt Limited, Urban Design Report, Page 26.

location close to Auckland (including employment and commercial opportunities in its southern growth areas), its advantage in house/land prices (compared to Auckland, Drury and Pukekohe), its accessible location in terms of road transport and its potential in terms of rail transport.

- 6.13 There is currently no confirmed or long-term growth strategy for Pokeno that can be used to maximise its opportunities and ensure growth is integrated with the existing areas and town centre. The PWDP process offers this opportunity for Council.
- 6.14 Havelock is an ideal location for growth in Pokeno and gives effect to the following Waikato Regional Policy Statement growth principles:
- (a) Pokeno is identified as a location of high growth;
 - (b) Havelock would be an extension of the existing urban area of Pokeno, forming a new neighbourhood contiguous with existing and planned growth;
 - (c) It would be consistent with a compact urban form and support the existing township; and
 - (d) The site is well connected to Pokeno and can support walking and cycling connections to the town.
- 6.15 An additional benefit of the Havelock development is the direct linkage it will provide between the Pokeno Town Centre and Bluff Road, which would allow residents on Bluff Road, Pioneer Road and Miller Road to be more connected to the Pokeno community. The proposed new neighbourhood local centre will provide a range of amenities and commercial services to cater for the needs of the local community.

Changes sought to plan provisions to enable Havelock

- 6.16 In order to enable Havelock, HVL seeks the following changes to the PWDP:
- (a) Rezone the 148ha site from Rural to Residential. HVL anticipates that its substantive case will be heard as part of *Hearing 25: Zone Extents*;
 - (b) The inclusion of site-specific provisions to ensure that the anticipated masterplan outcomes can be achieved (eg development controls in Lot sizes, building height setbacks and site coverage). HVL anticipates that it will address these issues at *Hearing 25: Zone Extents*;

- (c) The inclusion of site-specific provisions for the management of indigenous biodiversity and SNAs on the site. Specifically, greater flexibility is sought to recognise that some areas of indigenous biodiversity may need to be modified to allow for residential development, but that overall, indigenous biodiversity across the site will be maintained through a combination of ecological protection, mitigation, enhancement, offset, and compensation. HVL anticipates that it will address these issues at *Hearing 22: Natural Environment* and *Hearing 25: Zone Extents*; and
- (d) Removal of the SAL identified on site. HVL's experts have assessed this area and do not consider that it contains sufficient amenity landscape values warranting its inclusion as a SAL in the plan. HVL anticipates that it will address this issue at *Hearing 22: Natural Environment*.

Key issues to be addressed for Havelock

6.17 The key issues to be determined in relation to Havelock are:

- (a) Growth management and urban development capacity: The management of urban growth is a critical issue for the District and is likely to be a matter of considerable attention during the hearing process. There is currently a lack of clarity in the high order policy framework for growth in Pokeno. The PWDP must give effect to the National Policy Statement on Urban Development Capacity 2016 (**NPSUDC**) and this is the dominant policy direction on this issue, given its place in the planning hierarchy. The Waikato Regional Policy Statement is outdated in relation to Pokeno and was prepared before the NPSUDC. Future Proof 2017 identifies Pokeno as a high growth location but has yet to be refreshed to implement the NPSUDC. More recently there is further strategic and spatial planning work underway including the Hamilton to Auckland Corridor Plan, Future Proof Phase 2 and Waikato District's own Blueprint for Growth. Collectively, these plans signal significant growth potential and demand within existing urban settlements in the Waikato District and in particular North Waikato, which is heavily influenced by the expansion of growth in South Auckland.
- (b) The logical direction of settlement extension around Pokeno, along with the appropriateness of urbanising this southern part of Pokeno given its location and existing characteristics;

- (c) The proposed urban form of Havelock, including its proposed density and minimum lot sizes;
- (d) The management of indigenous biodiversity on site and recognition of the ability to balance the removal of some areas of lower value biodiversity currently identified as SNA with restoration and enhancement in other areas;
- (e) The sensitivity of the proposed development on existing ridgelines and slopes facing Pokeno and the extent of the SAL on the Site;
- (f) Interface issues with the light and heavy industrial activities to the north west. In this regard, HVL is currently exploring design refinements to its Master Plan to provide for an appropriate buffer between its proposed residential use and these industrial activities. HVL anticipates that it will address these design refinements at the substantive hearing of its case as part of *Hearing 25: Zone Extents*;
- (g) The infrastructure required to service the development and the sequence and timing for its delivery;
- (h) Appropriate stormwater flood risk management; and
- (i) Adequate protection for a potential pa site in the area known as Transmission Hill.

6.18 The substantive merits of these issues will be addressed by HVL's expert team throughout the course of the hearing process.

7. PLAN-WIDE ISSUES

7.1 Both TVL and HVL are further submitters on a number of plan-wide issues including the management of natural hazards and requests to delay or defer the PWDP pending other statutory and non-statutory planning processes.

7.2 These matters will be largely addressed in Topic 2, for which HVL and TVL have lodged joint evidence. TVL and HVL generally endorse the approach recommended in the section 42A report on these matters although notes that there are also site-specific management tools that can be deployed to manage natural hazard risks should the anticipated timing for Stage 2 of the PDWP be delayed. It requests that the Panel accept those recommendations and continue to hear the submissions on the PWDP in a timely and efficient manner.

8. CONCLUSION

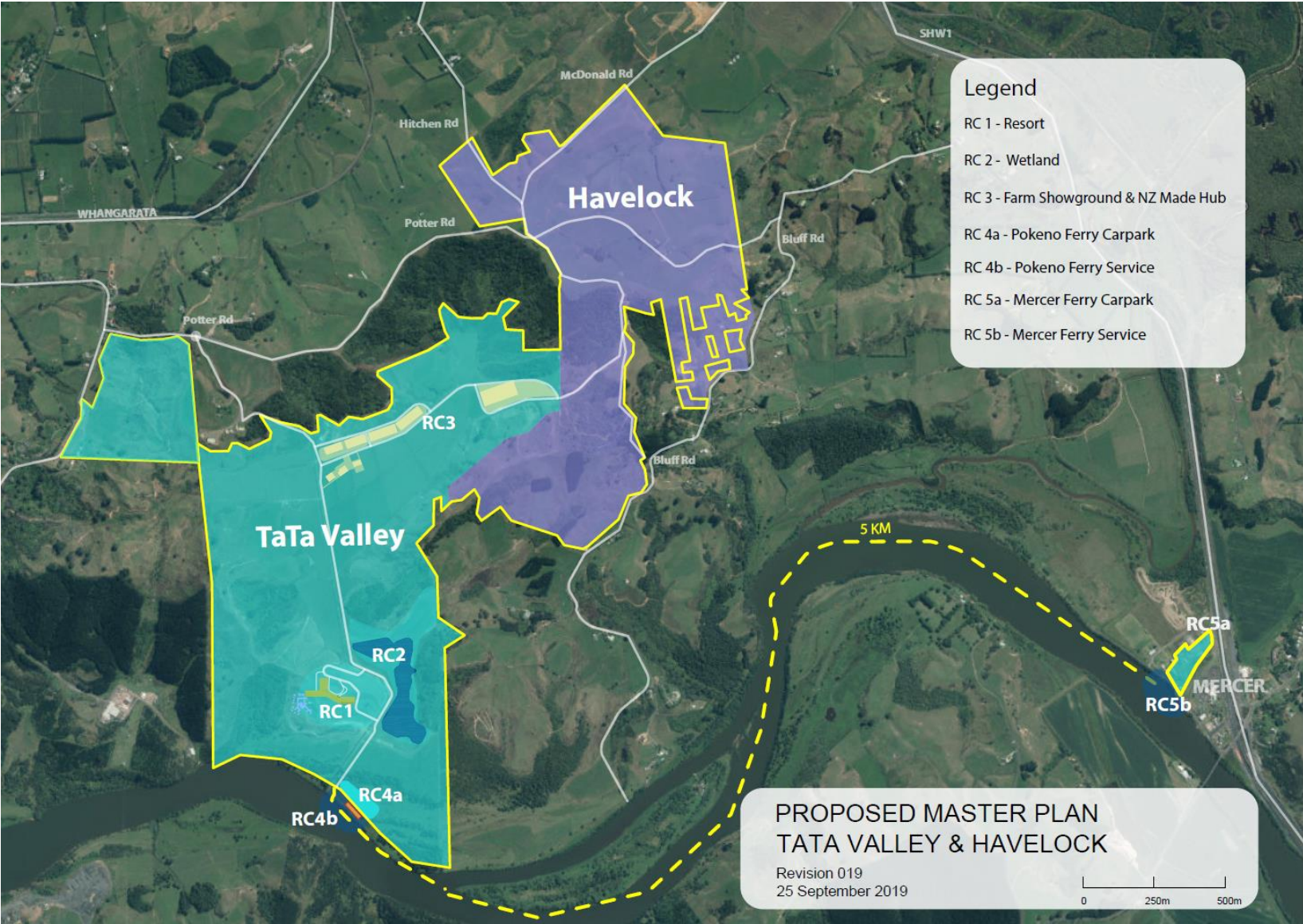
- 8.1 Both HVL and TVL have provided comprehensive submissions on the PWDP which are supported by detailed technical analysis. Both submissions seek a suite of changes to the PDWP to enable its proposed Resort and residential developments. Although HVL and TVL understand that their substantive rezoning cases will not be heard until September or October next year, they both expect to take an active role in the upcoming Topic hearings where the issues raised affect their interests.
- 8.2 HVL and TVL therefore respectfully request that the Hearing Panel have regard to these opening legal submissions and the important background and context they provide as part of their ongoing deliberations. These submissions should also assist by providing context for TVL's and HVL's expert evidence to be presented in upcoming hearings.

DATED this 26th day of September 2019

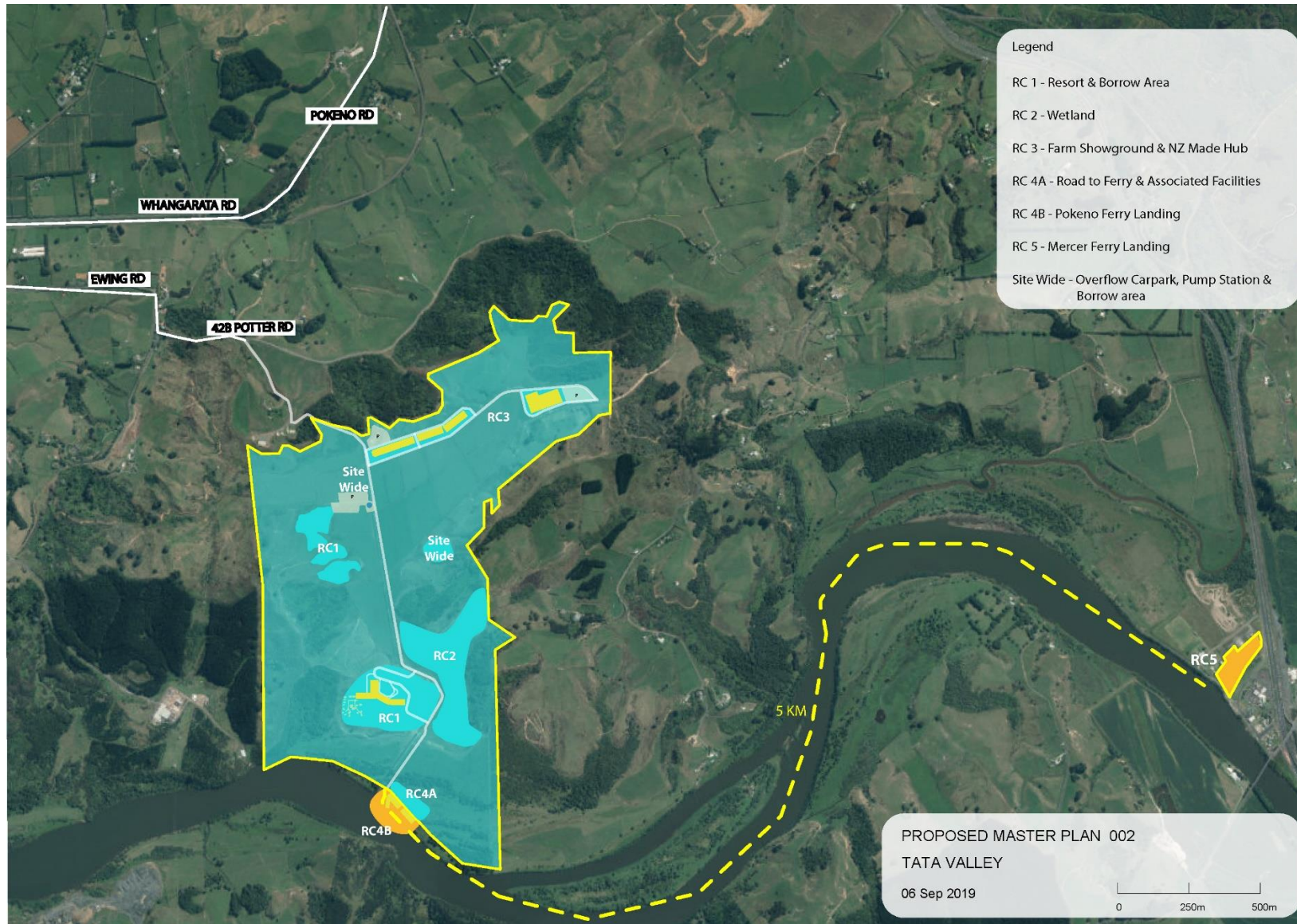


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TaTa Valley Limited

Appendix A – Proposed Master Plan TaTa Valley and Havelock



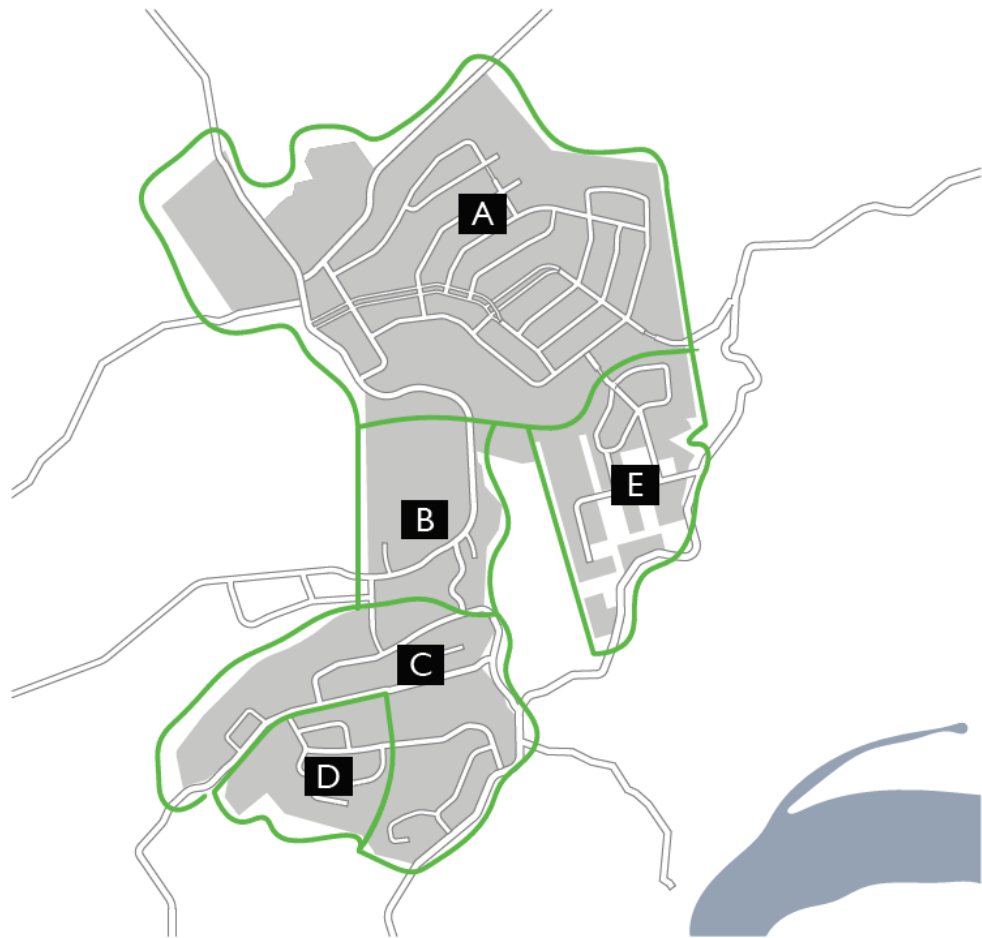
Appendix B – Proposed Master Plan TaTa Valley



Appendix C – Technical expert reports that have been prepared in relation to the Tata Valley proposal

1. Engineering Report, Drawings, Earthwork Volumes and Contaminant Modelling prepared by Alister Hood and Ryan Pitkethley at Civil Plan Consultants;
2. Landscape Visual Assessment prepared by Rob Pryor at LA4 Landscape Architects;
3. Preliminary Site Investigation prepared by Geosciences Ltd;
4. Archaeological Assessment prepared by Ellen Cameron and Rod Clough at Clough and Associates Ltd;
5. Geotechnical Investigation Assessment prepared by S Lander at Lander Geotechnical Consultants Ltd;
6. Transport Assessment prepared by Wes Edwards at Arrive Ltd;
7. Ecological Effects Assessment and supporting Ecological Management Plan, Freshwater Fauna Management Plan, Lizard Management Plan, Bat Management Plan, prepared by Tim Martin at Wildlands Consultant Ltd;
8. Stormwater Assessment prepared by Beca Ltd;
9. Noise Assessment prepared by Jon Styles at Styles Group Ltd;
10. Architectural Designs and Statement prepared by Q Designz Ltd.
11. Architectural Design package by TOA Architects;
12. Design and geotechnical engineering reports for jetty structures by Land Development and Exploration Ltd;
13. Hydrological and Ecological Impact Assessments for jetty structures prepared by Tim Martin at Wildlands Consultant Ltd in association with Dr Shaw Mead at ECoast;
14. Noise Assessment for jetty structures by Marshall Day Acoustics.

Appendix D – Proposed Havelock Precinct Plan



Character Precincts

A | The Village

Residential development dispersed either side of the ridgeline between Potter Hill and Transmission Hill. Small to medium sized properties are to be bounded by green reserve areas and outlooks.

B | The Valley Floor

Tighter clusters of residential lots nestled into the terrain with pockets of Indigenous bush throughout.

C | Hamlets

Larger sites clustered together with an interface to farmland or native forrest in response to the rural context

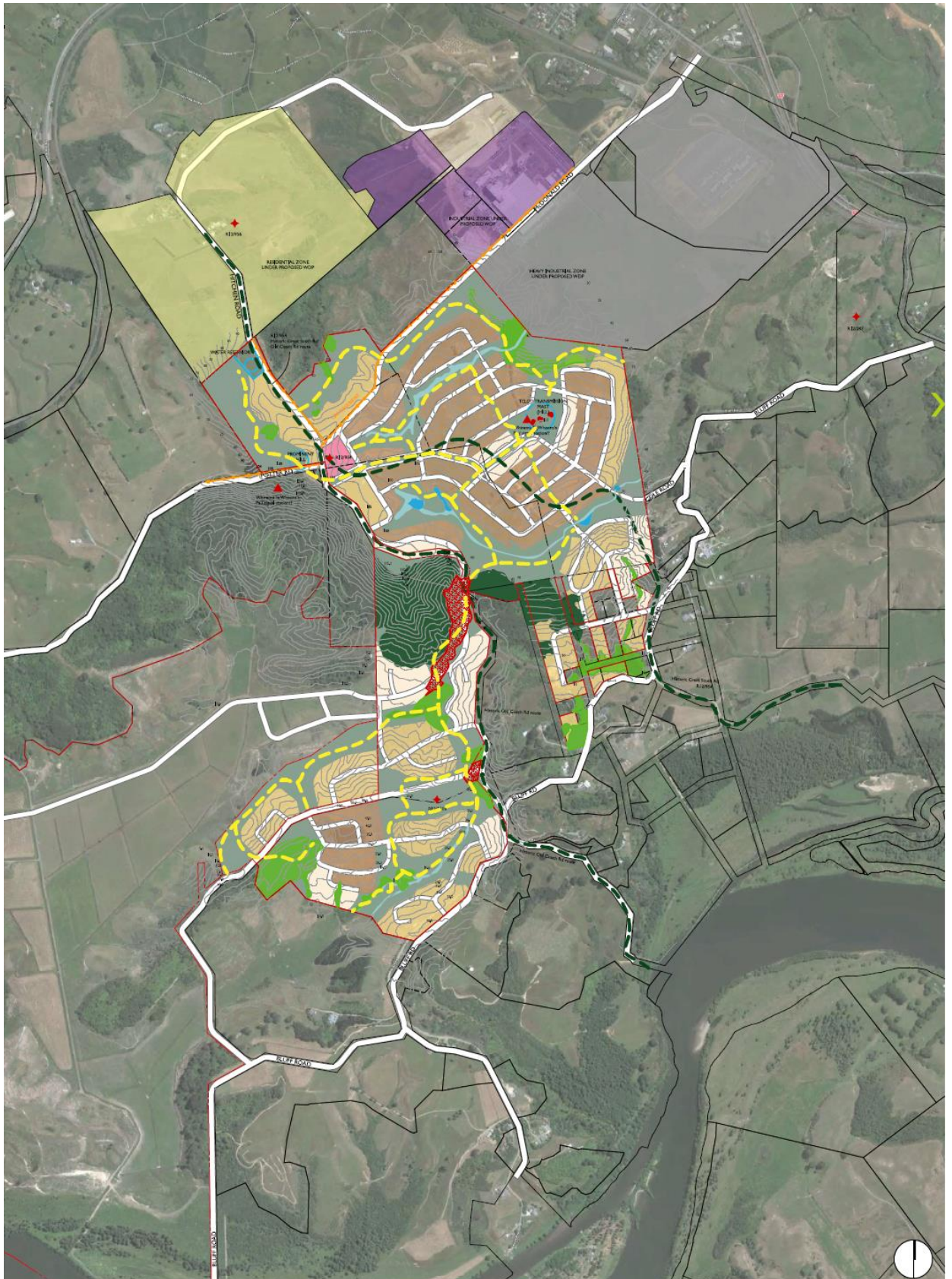
D | Hidden Village

Tighter clusters of medium/ large sized sites nestled into the landscape and visually concealed by the topography.

E | The Settlement

Residential lots dispersed throughout historic Havelock settlement site

Appendix E – Proposed Havelock Master Plan



Appendix F – Technical expert reports that have been prepared in relation to Havelock

1. Urban Design Report, Masterplan, Proposed Extent of SNA Plan and Precinct Plan prepared by Sara AK-Anbuky and Karl Baker at Konstrukt Architects
2. Archaeological Assessment prepared by Ellen Cameron and Rod Clough at Clough and Associates Limited;
3. Preliminary Geotechnical Report prepared by S Lander at Lander Geotechnical;
4. Preliminary Ecological Assessment prepared by Tim Martin at Wildland Consultants Limited;
5. Preliminary Site Investigation prepared by David Wilkinson at Geosciences Limited;
6. Visual Impacts Assessment and SAL Assessment prepared by Rob Pryor at LA4 Landscape Architects;
7. Infrastructure Report prepared by Alister Hood and Ryan Pitkethley at Civil Plan Consultants Limited;
8. Integrated Transport Assessment prepared by Nilu Seneviratne and Leo Hills at Commute.