

2 April 2026

Rotorua Lakes Council
Civic Centre, 1061 Haupapa Street
Rotorua, New Zealand



By email only: policy.planning@rotorualc.nz

Attention: Hearing Secretary

Dear Madam

PROPOSED PLAN CHANGE 8 (NATURAL HAZARDS) - FONTERRA POSITION STATEMENT

1. Fonterra Limited (**Fonterra**) (submitter 43) lodged a submission and further submission on Proposed Plan Change 8 (Natural Hazards) (**PC8**) to the Rotorua District Plan (**District Plan**). This letter sets out Fonterra's position in relation to PC8. Fonterra respectfully requests that this letter be provided to the Hearing Panel and tabled at the Hearing. Fonterra will not be filing any evidence and does not wish to be heard at the Hearing.
2. Fonterra has reviewed the Rotorua Lakes Council's Officer's Section 42A Report (**Section 42A Report**), relevant technical evidence supporting the Section 42A Report and Addendum 1 to the Section 42A Report (Update to Earthworks Performance Standards). Fonterra accepts the Section 42A Report recommendations (and associated reasoning) in relation to all of Fonterra's primary and further submission points.
3. In particular, Fonterra supports the following Section 42A Report recommendations (and associated reasoning) to:
 - a. Reinstate the existing 1000m³ permitted volume for earthworks in the Industrial 2 Zone within the General Earthworks Performance Standards (EW-S1);¹
 - b. Reinstate the existing permitted thresholds for cut and fill in the Rural 1 Zone and Industrial 2 Zone within the General Earthworks Performance Standards (EW-S1);²
 - c. Not extend the proposed new earthworks performance standard EW-S1(1)(g) to apply to Rural Zones;³ and
 - d. Not extend Rule NH-R5 (Buildings and Structures in an Overland Flowpath) to apply to Rural Zones.⁴
4. In terms of other key submission points:
 - a. Fonterra accepts the Section 42A Report reasons for retaining the Hazard Maps outside of the District Plan;⁵ and

¹ Fonterra's primary submission sought reinstatement of the 1000m³ permitted volume for earthworks in the Industrial 2 Zone with regards to the Reporoa Dairy Manufacturing Site (S_43_03).

² Fonterra supported the submission of Rotorua Planning Consultants Group in this regard (F_43_07).

³ Fonterra's further submission opposed Bay of Plenty Regional Council's (**BOPRC**) submission to extend performance standard EW-S1(1)(g) to Rural Zones (F_43_06).

⁴ Fonterra's further submission opposed BOPRC's submission to extend Rule NH-R5 to Rural Zones (F_43_05).

⁵ Fonterra's primary submission expressed concerns about the Flooding Maps and Overland Flowpath Maps sitting outside of the District Plan (submission point S_43_01).

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- b. Fonterra accepts there is no error in the Flooding Maps in relation to Fonterra's Farm Source facility located at 40 Marguerita Street.⁶
5. Should there be any queries raised in relation to any matters in Fonterra's submission and further submission, please contact me via the details provided below.

Yours sincerely,



Graeme Mathieson
Senior Consultant – Mitchell Daysh Limited
On behalf of Fonterra Limited

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⁶ Fonterra's primary submission questioned the accuracy of the Flooding Maps in relation to the Farm Source facility at 40 Marguerita Street (submission point S_43_01).