

Further Submission on Proposed Waikato Regional Policy Statement (November 2010)

SubForm	PRPS2	COVER SHEET	
FOR OFFICE USE ONLY			
Date Stamp		Submission Number	
Entered		Initials	
File Ref		Sheet 1 of	

FURTHER SUBMISSIONS CLOSE: 4.00 pm on Friday 15 July 2011

Full name: Future Proof Implementation Committee (FPIC)
If organisation, contact person: Ken Tremaine, Future Proof Implementation Advisor
Full postal address: 14 Spencer Street
 Remuera
 Auckland 1050
 NEW ZEALAND

Address for service: (if different from above) **Phone number(s):** 0274 768 300
 As above 09 522 2563

Fax: 09 523 4425
Email: ken@kentremaine.co.nz

In accordance with clause 8(1)(b) of the First Schedule of the RMA:

- I represent a relevant aspect of the public interest; and / or
 I have an interest in the Proposed RPS greater than the interest of the general public.

and my reason(s) are:

The FPIC is the implementation arm of the Future Proof Growth Strategy; the growth management strategy for the Future Proof sub-region which refers to the territorial administrative areas of the Hamilton City Council, the Waipa District Council and the Waikato District Council. Future Proof's sub-regional policy framework is being implemented via provisions mainly in Chapters 6-6C of the Proposed RPS. It is a priority action for Strategy implementation to give statutory effect in the Regional Policy Statement to the Future Proof settlement pattern and the establishment of urban limits. The Proposed RPS is the key implementation tool for giving statutory effect to major Future Proof principles, and the FPIC is therefore affected by a number of the submissions made.

Do you wish to speak at the hearing?

- Yes No

If others make a similar submission would you be prepared to consider a joint case?

- Yes No

Total number of pages:

23



Date: 15 July 2011

Signature of person making further submission
 (or person authorised to sign on behalf of person making further submission)



Future Proof Implementation Committee
c/o Ken Tremaine
14 Spencer St
Remuera
AUCKLAND 1050

15 July 2011

Chief Executive
Waikato Regional Council
Attention: RPS Team
Private Bag 3038
Waikato Mail Centre
Hamilton 3240

BY EMAIL TO: rps@waikatoregion.govt.nz

Dear Sir,

FURTHER SUBMISSION TO THE PROPOSED WAIKATO REGIONAL POLICY STATEMENT

This is a further submission by the Future Proof Implementation Committee (“FPIC”) to the *Proposed Waikato Regional Policy Statement* (“Proposed RPS”).

The FPIC has an interest in the Proposed RPS that is greater than the interest that the general public has because it is the implementation arm of the Future Proof Growth Strategy (“Future Proof” or “Strategy”); the growth management strategy for the Future Proof sub-region which refers to the territorial administrative areas of the Hamilton City Council (“HCC”), the Waipa District Council (“Waipa DC”) and the Waikato District Council (“Waikato DC”). Future Proof’s sub-regional policy framework is being implemented via provisions mainly in Chapters 6-6C of the Proposed RPS. It is a priority action for Strategy implementation to give statutory effect in the Regional Policy Statement to the Future Proof settlement pattern and the establishment of urban limits. The Proposed RPS is the key implementation tool for giving statutory effect to major Future Proof principles, and the FPIC is therefore affected by a number of the submissions made.

While the FPIC includes representatives from the HCC, Waipa DC, Waikato DC, the Waikato Regional Council, and Tāngata Whenua (Waikato-Tainui), as the administering authority for the Proposed RPS the Waikato Regional Council has abstained from forming a part of this submission. The Future Proof partners may still make individual submissions.

The focus of this submission has been to further submit in support of parties whose views align with those set out in the original FPIC submission and to further submit in opposition of those whose views undermine them. The FPIC strongly supports the implementation of key aspects of the Future Proof Strategy and settlement pattern in the Proposed RPS particularly at *Chapter 6 Built Environment*. The content of the FPIC further submission follows overleaf.

The FPIC is willing to appear in support of its further submission. If others make a similar further submission the FPIC would also be prepared to consider presenting a joint case with them at any hearing.

Yours sincerely,

A handwritten signature in black ink that reads "Ken Tremaine". The signature is written in a cursive style with a large initial 'K' and a trailing flourish.

Ken Tremaine
Future Proof Implementation Advisor

FPIC Further Submission to the Proposed RPS

	Submitter	Matter Number	Provision	Support / Oppose	Reason	Relief Sought
1.	94 Hamilton City Council	PRPS2 - 94.2	Introduction	Support	The FPIC supports the submitter's request to retain and support the Introduction which includes references to plans and strategies prepared under other Acts. This aligns with the FPIC submission and we agree that this enables integrated management of the built environment.	Allow submission.
2.	3 Rotorua District Council	PRPS2 - 3.5	Issue 1.4 Managing the built environment	Support	Agree with submission request to retain Issue 1.4. This aligns with the FPIC submission which generally supported this issue and its explanation because it acknowledges that development of the built environment, transport, and other infrastructure impacts on abilities to sustainably manage natural and physical resources and the provision of wellbeing, and supports strategic planning for development in high growth areas. The Future Proof Strategy recognises these aspects to this issue as well and makes similar provisions and actions to address them.	Allow submission.
3.	92 Waipa District Council	PRPS2 - 92.7	Issue 1.5 Relationship of tāngata whenua with the environment (te taiao)	Support	The submitter's request to retain Issue 1.5 aligns with the FPIC submission to do the same. We agree that this issue appropriately recognises the important role that tāngata whenua have in policy development.	Allow submission.
4.	77 Environmental Defence Society Inc	PRPS2 - 77.5	Issue 1.6 Health and wellbeing of the Waikato River	Support	Agree with submitter's request to retain Issue 1.6 in its entirety. This aligns with the FPIC submission which acknowledges and supports this issue and its explanation that the relationship of the Waikato River Iwi with the Waikato River is at the heart of their well being and identity. The FPIC also supports that the Proposed RPS recognises that the Waikato River is degraded and contains provisions aimed at restoring its health as a priority. The Future Proof Strategy recognises the need to protect and restore the Waikato River and to balance its competing uses and values.	Allow submission.
5.	27 Waikato District	PRPS2 -	NEW Issue in Chapter	Support	Submitter's request to add an issue in Chapter 1 which deals	Allow submission.

	Submitter	Matter Number	Provision	Support / Oppose	Reason	Relief Sought
	Council	27.2	1 on enabling people to access resources at a reasonable cost as part of providing for their wellbeing		with the first part of section 5 of the RMA 1991 on enabling people to provide for their well being is supported. This aligns with the FPIC submission which made a similar request.	
6.	162 Director General of Conservation	PRPS2 - 162.8	Objective 3.1 Integrated management	Support	Agree with submitter's support of Objective 3.1 and that it should be retained. This aligns with the FPIC submission to do the same. This objective strongly aligns with Future Provisions on development generally, tāngata whenua and cultural considerations, Waikato River issues, integrated planning, and collaboration.	Allow submission.
7.	179 Winstone Aggregates – a Division of Fletcher Concrete and Infrastructure Ltd	PRPS2 - 179.4	Objective 3.2 Decision making	Oppose	The submitter requests the deletion of Objective 3.2. This is strongly opposed. Objective 3.2 contains a number of important statements including the need for integration, and the time that may be needed for change to occur.	Disallow submission.
8.	65 KiwiRail	PRPS2 - 65.5	Objective 3.11 Built environment	Support	Agree with submitter's support of this objective and that it is an important component of integrated planning for the region. This aligns with the FPIC submission.	Allow submission.
9.	182 TrustPower	PRPS2 - 182.5	Objective 3.11 Built environment	Oppose	The submitter seeks the addition of the words “for public infrastructure” in Objective 3.11, implying that only public infrastructure should be planned in an integrated and sustainable manner to provide for positive environmental, social, cultural and economic outcomes. Any development of the built environment should have to meet this objective so the proposed additional wording is opposed.	Disallow submission.
10.	77 Environmental Defence Society Inc	PRPS2 - 77.27	Objective 3.25 High class soils	Oppose	Submitter requests that this objective be amended to provide further direction as to what is inappropriate subdivision, use or development citing for example that residential development on such soils is to be avoided. We oppose this request. Within the Future Proof sub-region, almost all of the Waipa District is land of high class soil and it would be impossible to implement a blanket provision that all residential development on such	Disallow submission.

Submitter	Matter Number	Provision	Support / Oppose	Reason	Relief Sought	
				soils (for example) is to be avoided. Rather it is our position that generally, land areas with high class soils can be used for residential and other development types if it is part of a growth strategy and settlement pattern anchored in the RPS and in the district plans of the relevant districts/cities affected.		
11.	65 KiwiRail	PRPS2 - 65.6	Policy 4.1 Integrated management	Support	Agree with submitter's request to retain policy 4.1 and support it because it requires an integrated approach to planning. This aligns with the views set out in the FPIC submission. The adoption of an integrated approach to resource management is a strategic approach which recognises and can accommodate the changing environment and changing resource use pressures and trends. Given that the Future Proof sub-region (Hamilton City, Waipa and Waikato Districts) in particular is experiencing significant and rapid population and development growth and related pressures, the FPIC agrees that this policy approach would assist in managing them.	Allow submission.
12.	27 Waikato District Council	PRPS2 - 27.5	Method 4.1.2 Land use change	Support	The submitter seeks an amendment to method 4.1.2 to acknowledge that the Waikato Regional Council has a role in planning by providing a regional perspective and promoting a coordinated approach between territorial authorities and ensuring that regionally significant infrastructure is well managed. The requested amendment is supported because it aligns with the FPIC submission.	Allow submission
13.	94 Hamilton City Council	PRPS2 - 94.27	Policy 4.2 Collaborative approach	Support	Agree with submitter's support of policy 4.2 and request that it be retained. This aligns with the FPIC submission to do the same as this policy is consistent with Future Proof's approach to collaboration.	Allow submission.
14.	184 Matamata Piako, Hauraki, South Waikato, Thames-Coromandel, Otorohanga and	PRPS2 - 184.47	Method 4.2.4 Joint Planning	Oppose	Submitters oppose this method on the grounds that it directs matters that are not enforceable and should be deleted. In the alternative, if this method is retained the submitter considers that the word "will" should be replaced with "may" or "may consider" reasoning that the RPS cannot mandate matters	Disallow submission.

	Submitter	Matter Number	Provision	Support / Oppose	Reason	Relief Sought
	Waitomo District Councils				other than regional or district plans. The submitter's view is opposed. Under section 30(1) of the RMA 1991, the Waikato Regional Council has a number of functions that do not apply only to regional and district plans. For example under section 30(1)(gb) Regional Councils have the function of the strategic integration of infrastructure with land use through objectives, policies, and methods. The wording of this sub-section clearly refers to regional policy statements. The submitters' appear to misunderstand the use of the word "will". As expressed in the Proposed RPS, method 4.2.4 sets out an intention to look at joint initiatives and not a directive to do so.	
15.	12 New Zealand Historic Places Trust, Tauranga	PRPS2 - 12.10	Policy 4.3 Tāngata Whenua	Support	Agree with submitter's request to retain Policy 4.3 and its view that this policy and related methods will assist to ensure Maori heritage values and interests are recognised and provided for. This aligns with the FPIC submission and provisions in the Future Proof Strategy relating to tāngata whenua.	Allow submission.
16.	156 Bhaady Miller & Simon Upton	PRPS2 - 156.2	Chapter 6 – general All Future Proof policies and methods	Oppose	The submitter seeks the deletion of all the policies and methods referring to Future Proof in particular the urban limits and density targets. This is strongly opposed as Chapter 6 of the Proposed RPS is the key means of giving statutory effect to the Future Proof Strategy, and in particular the Future Proof settlement pattern and the implementation of urban limits.	Disallow submission.
17.	153 St Peters School Trust Board	PRPS2 - 153.7	Chapter 6 – general Policies 6.12 – 6.18	Oppose	The submitter seeks the deletion of Policies 6.12 to 6.18 and considers that it should be replaced with a single policy referring to the Future Proof Strategy which establishes high level development principles that should be followed in identifying appropriate regional and district plan provisions and proposals for its implementation. We strongly oppose this submission. Policies 6.12-6.18 all have a part to play in the implementation of key aspects of the Future Proof Strategy and should all be retained (subject to the proposed amendments set out in the FPIC submission).	Disallow submission.
18.	77 Environmental	PRPS2 -	Policy 6.1 Planned and	Oppose in	EDS's support for planned and co-ordinated development	Disallow submission

	Submitter	Matter Number	Provision	Support / Oppose	Reason	Relief Sought
	Defence Society Inc	77.37	co-ordinated development	part	aligns with the FPIC submission. However we oppose the request to specifically map the urban limits areas in the detail requested in the RPS as this is for District Plans to do. The urban limits shown on Map 6-1 of the Proposed RPS already indicates where the urban limits for the Future Proof sub-region are.	request for the Proposed RPS and the Waikato Regional Council to specifically map the urban limits areas. Map 6-1 is sufficient (save for the amendments set out in the FPIC submission to remove the word 'indicative').
19.	161 Sue Edens & Brian Sharp	PRPS2 - 161.4	Policy 6.1 Planned and coordinated development.	Oppose	The submitters seek the deletion of Policy 6.1 and associated methods. This request is opposed. This policy (and its related methods and explanation) align with Future Proof guiding principles and priority actions for implementation to have development of the built environment including transport and other infrastructure occur in a planned and coordinated manner which is guided by a set of agreed development principles, recognises and addresses potential cumulative effects of development, and is based on sufficient information to allow the assessment of potential long term effects. Deleting this policy and associated provisions would for example, undermine this and a number of other related provisions on integrated management in the Proposed RPS document.	Disallow submission.
20.	101 Counties Power Ltd	PRPS2 - 101.7	Method 6.1.1 District plans and development planning mechanisms	Oppose	The submitter seeks that the additional words 'EW shall ensure' are added to this method. However, the method relates to the principles in section 6A which are meant to be given particular regard to, but must be able to be weighed up in light of the particular circumstances. The wording proposed by Counties Power Ltd is not supported.	Disallow submission
21.	58 McDonald's Lime Limited	PRPS2 - 58.7	Method 6.1.4 District plan provisions for rural-residential	Oppose	The submitter seeks that the method set out in 6.1.4 should apply to residential as well as rural-residential development. The FPIC opposes this, because the relevant factors for	Disallow submission.

Submitter	Matter Number	Provision	Support / Oppose	Reason	Relief Sought	
		development		consideration in terms of rural-residential development are not the same as those which apply to residential development, which are set out in other section 6 policies and methods.		
22.	141 Contact Energy Limited	PRPS2 - 141.10	Method 6.1.4 District plan provisions for rural-residential development	Oppose	The submitter requests amendments to this method so that it applies to urban and rural-residential development. This is opposed. Method 6.1.4 relates to rural-residential development. It is not appropriate to include urban development under this method. Urban development is addressed through other policies and methods in section 6 of the Proposed RPS and this is considered appropriate.	Disallow submission.
23.	184 Matamata Piako, Hauraki, South Waikato, Thames-Coromandel, Otorohanga and Waitomo District Councils	PRPS2 - 184.84	Method 6.1.7 Information to support new urban development	Oppose	The submitter requests that Method 6.1.7 is deleted, or changed to only apply to new urban development with regionally significant effects. Method 6.1.7 sets out information requirements to support new urban development and is supported by the FPIC. It is necessary that any urban development in the region should be supported by appropriate information requirements and therefore the proposed changes/deletions sought by the submitter are opposed.	Disallow submission.
24.	101 Counties Power Ltd	PRPS2 - 101.12	Policy 6.3 Co-ordinating growth and infrastructure	Oppose	The submitter seeks a new method be added to this policy requiring that Local Authorities identify existing and planned infrastructure. The proposed change appears to be suggesting that Local Authorities undertake the planning on behalf of infrastructure operators. The identification of existing and planned infrastructure will occur as required in the context of the available information and the requirements upon Local Authorities. Therefore it is considered that the change sought by the submitter is inappropriate and places too high a burden upon Local Authorities.	Disallow submission.
25.	154 Meridian 37 Limited	PRPS2 - 154.10	Policy 6.3 Co-ordinating growth and infrastructure	Oppose	Meridian 37 Limited requests that Policy 6.3 be amended to recognise the role of the private sector in providing infrastructure and services, and needs to acknowledge that local circumstances will determine the most appropriate level of infrastructure and services provision. We oppose this	Disallow submission.

Submitter	Matter Number	Provision	Support / Oppose	Reason	Relief Sought	
				<p>submission.</p> <p>As notified, this policy is in line with Future Proof's integrated approach to planning as well as its guiding principles and implementation actions. The FPIC are particularly supportive of this policy's intention to (among other things) ensure that the nature, timing and sequencing of new development is coordinated with funding and infrastructure. This is a fiscally responsible position to take for both the public and private sector. And while the private sector does provide some infrastructure and services, it is the local government sector, in particular the Councils, who are statutorily responsible under the LGA 2002 for maintaining and depreciating infrastructure. Policy 6.3 aims to ensure that a coordinated and integrated approach across regional and district boundaries and agencies is achieved thus capturing the roles of both the private and public sectors.</p>		
26.	184 Matamata Piako, Hauraki, South Waikato, Thames-Coromandel, Otorohanga and Waitomo District Councils	PRPS2 - 184.97	Method 6.3.2 Aligning infrastructure and land use planning	Oppose	<p>The submitters seek the deletion of Method 6.3.2 in its entirety. This method seeks to ensure alignment of infrastructure and land use planning through a coordinated approach. The submitter's request is opposed as this method is key in ensuring that integrated management of land use and infrastructure provision does occur, which is part of the Regional Council's responsibilities under section 30 (1)(gb) of the RMA 1991.</p>	Disallow submission.
27.	184 Matamata Piako, Hauraki, South Waikato, Thames-Coromandel, Otorohanga and Waitomo District Councils	PRPS2 - 184.100	Method 6.3.5 Planning for land use and transport	Oppose	<p>The submitters seek the deletion of Method 6.3.5 which sets out that as appropriate, growth strategies, structure plans, regional land transport strategies, development manuals and design codes should be consistent with Policy 6.3. This method is considered key in ensuring that integrated, co-ordinated and planned development occurs, and its deletion is therefore opposed.</p>	Disallow submission.
28.	27 Waikato District	PRPS2 -	Policy 6.4 Marae and	Support	<p>Support submitter's request to retain policy 6.4 because it</p>	Allow submission.

	Submitter	Matter Number	Provision	Support / Oppose	Reason	Relief Sought
	Council	27.11	Papakāinga.		rightly recognises the importance of marae and papakāinga. This aligns with the FPIC submission.	
29.	80 Carter Holt Harvey Ltd	PRPS2 - 80.7	Policy 6.6 Significant infrastructure and energy resources	Oppose	The submitter seeks that the policy also includes significant industrial activities. Policy 6.6 is written in relation to significant infrastructure and energy resources and therefore should not be amended to include industrial uses. Also, the effects of reverse sensitivity on industrial uses are already captured in Objective 3.11 and development principle 6A (I).	Disallow submission.
30.	114 Fonterra Co-operative Group Ltd	PRPS2 - 114.33	Policy 6.6 Significant infrastructure and energy resources Proposed definitions for 'Infrastructure' and 'Regionally significant infrastructure'	Oppose	This policy is set up to address significant infrastructure and energy resources. The submitter seeks that the policy be amended to include industry. This is not appropriate as existing industries are already addressed in other objectives/policies and in the principles in 6A (eg principle (I)).	Disallow submission.
31.	138 Delahunty, Catherine	PRPS2 - 138.1	Policy 6.7 Access to minerals	Oppose	Submitter seeks the deletion of policy 6.7. This is opposed because securing access to mineral resources is an important resource management responsibility for councils, where those resources are essential to community wellbeing. So other than the amendments to this policy (set out in the FPIC submission), we consider that this policy should be retained.	Disallow submission.
32.	184 Matamata Piako, Hauraki, South Waikato, Thames-Coromandel, Otorohanga and Waitomo District Councils	PRPS2 - 184.126	Policy 6.8 Information collection	Oppose	The submitters seek the deletion of this policy based on concerns that these types of advocacy methods have cumulative cost and resourcing implications for the Waikato Regional Council, territorial authorities and ratepayers. The FPIC opposes the deletion of this policy. Collating information and keeping records on locations, lot numbers, lot sizes of subdivision consents and locations of vacant residential lots and industrial lots assists with monitoring and reviewing information, and the trends that they display. This enhances decision-making capability.	Disallow submission.

	Submitter	Matter Number	Provision	Support / Oppose	Reason	Relief Sought
33.	77 Environmental Defence Society Inc	PRPS2 - 77.45	Policy 6.12 Governance collaboration in the Future Proof area	Support	Agree with the submitter's view that it is appropriate to have limits for new urban limits in specified areas and that new residential development shall occur in accordance with population triggers and sequencing to achieve specified density targets. We also agree with the submitter's request that the Future Proof area limit rural residential development particularly in the vicinity of Hamilton City. This aligns with the views set out in the FPIC submission given the intense patterns of rural residential development around the region especially in areas with high population and growth pressures like the Future Proof sub-region.	Allow submission.
34.	149 Koppens, Leo	PRPS2 - 149.1	Policy 6.12 Governance collaboration in the Future Proof area	Oppose	<p>The submitter seeks deletion of this policy on the grounds that Future Proof "has not been subjected to the planning processes of the RMA and as such, has no legal standing. Therefore it cannot be referred to by its name in the Proposed RPS". This is strongly opposed. Future Proof's operational and implementation processes have been designed to be consistent with the three major planning statutes relevant to local government i.e. RMA 1991, LGA 2002 and LTMA 2003. Future Proof was developed in the broad context of the LGA 2002 and has been through the comprehensive special consultative procedures of that statute.</p> <p>The Future Proof Strategy is also consistent with the purpose of the RMA 1991 and other matters contained in Part 2 of that Act. Regional Councils under section 30(1)(gb) of the RMA 1991 have the function of the strategic integration of infrastructure with land use. The sub-regional settlement pattern set out in Future proof is a key part of the integrated approach to land use, infrastructure and funding and is also crucial to achieving the sustainable management of growth for the sub-region and the wider Waikato region as anticipated by Part 2 of the RMA 1991, in particular section 5(2) to manage</p>	Disallow submission.

Submitter	Matter Number	Provision	Support / Oppose	Reason	Relief Sought	
				“the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic, and cultural well-being and for their health and safety...”		
35.	154 Meridian 37 Limited	PRPS2 - 154.3	Policy 6.12 Governance collaboration in the Future Proof area	Oppose	The submitter’s request to delete this policy is strongly opposed. Policy 6.12 is important for the effective and sustained implementation of the Future Proof Strategy. This policy gives direct statutory effect to the Future Proof Strategy and its implementation relationships.	Disallow submission
36.	53 Poultry Industry Association of NZ (Inc) and Egg Producers Federation of NZ (Inc)	PRPS2 - 53.8	Policy 6.13 Adopting Future Proof land use pattern Urban Limits	Oppose in part	The submitter supports the concepts of urban limits but wants to see the urban limits mapped down to property boundary level. This is opposed as it is clear in the Future Proof methods that the detailed mapping of urban limits should occur as part of District Plan/Structure Plan processes in order that local conditions can be considered.	Disallow submission in so far as it seeks to delineate urban limits down to property level.
37.	77 Environmental Defence Society Inc	PRPS2 - 77.46	Policy 6.13 Adopting Future Proof land use pattern	Support	Agree with submitter’s view that it is appropriate to have limits for new urban limits in specified areas and that new residential development shall occur in accordance with population triggers and sequencing to achieve specified density targets. We also agree with the submitter’s request that the Future Proof area limit rural residential development particularly in the vicinity of Hamilton City. This aligns with the views set out in the FPIC submission given the intense patterns of rural residential development around the region especially in areas with high population and growth pressures like the Future Proof sub-region.	Allow submission
38.	86 Genesis Energy Ltd, Corporate Office	PRPS2 - 86.39	Policy 6.13 Adopting Future Proof land use pattern	Oppose	The submitter opposes Policy 6.13 and seeks its deletion on the grounds that it is not appropriate to prescribe where infrastructure development may be required to occur in the future. We strongly disagree with this request as Policy 6.13 is fundamental to ensuring that urban development occurs in a planned and integrated way in accordance with the land use pattern and sequencing that has been established through the	Disallow submission.

Submitter	Matter Number	Provision	Support / Oppose	Reason	Relief Sought	
				Future Proof process.		
39.	154 Meridian 37 Limited	PRPS2 - 154.4	Policy 6.13 Adopting Future Proof land use pattern	Oppose	Meridian 37 Limited opposes this policy and seeks that it be deleted (along with its associated methods) in their entirety or that a new Strategic Industrial Nodes policy be inserted (and other consequential/similar amendments having the same effect be added). The FPIC opposes this request. Policy 6.13 should not be deleted as it is one of the most key policies in Chapter 6 of the Proposed RPS. This policy gives statutory effect to the Future Proof sub-regional settlement pattern through the use of urban limits, outlining of growth allocations and the identification of growth areas and associated timing. The Future Proof sub-regional settlement pattern is the cornerstone of the Strategy. Save for amendments (as set out in the FPIC submission) to reduce ambiguities and strengthen provisions upholding the land use pattern, this policy should be retained.	Disallow submission.
40.	178 Perry Group Ltd	PRPS2 - 178.4	Policy 6.13 Adopting Future Proof land use pattern	Oppose	The submitter seeks the deletion of Policy 6.13 or in the alternative a number of significant changes to the policies, tables and maps. This is opposed as Policy 6.13 is fundamental to ensuring that urban development occurs in a planned and integrated way in accordance with the land use pattern and sequencing that has been established through the Future Proof process.	Disallow submission.
41.	27 Waikato District Council	PRPS2 - 27.17	Policy 6.13 (a)	Oppose	The submitter requests a number of amendments to Policy 6.13 which in general, align with those set out in the FPIC submission. However we disagree with a proposed amendment to Policy 6.13(a) to indicate that new urban development shall occur "in a manner that is generally consistent with" the Urban Limits indicated in Map 6-1 of the Proposed RPS. We consider the current wording to be appropriate (amended only as set out in the FPIC submission). In terms of anchoring the Future Proof land use pattern in the Proposed RPS it is important for certainty and consistency that	Disallow submission request to amend policy wording 6.13(a) regarding the urban limits.

Submitter	Matter Number	Provision	Support / Oppose	Reason	Relief Sought	
					development be occur within the urban limits. For development to be undertaken in a manner that is 'generally consistent' with the urban limits is not a firm policy outcome.	
42.	114 Fonterra Co-operative Group Ltd	PRPS2 - 114.35	Policy 6.13 (d)	Oppose	Fonterra seeks the deletion of Policy 6.13(d) or in the alternative, amendments to Table 6-2 to reflect the figures of Table 2 of Proposed Change No.2 to the Waikato RPS. The submitter's request is opposed. Proposed Change No.2 to the Waikato RPS was officially withdrawn in April of this year as it was incorporated into the RPS Review which culminated in the Proposed RPS document. Also, Policy 6.13(d) (which sets out that new industrial development should predominantly be located in the strategic industrial nodes in Table 6-2 of the Proposed RPS and sets out criteria for the location of other development) should not be deleted as it is a key policy requirement in order to ensure that clear guidance is in place on where industrial development should occur in the Future Proof area.	Disallow submission.
43.	173 Titanium Park JV	PRPS2 - 173.11	Policy 6.13 (f)	Oppose in part	The submitter seeks to expand this part of the policy to allow for the use of airside land for a number of purposes, including for activities that require large regular-shaped land areas. This part of the submission is opposed, because part (f) of Policy 6.13 is specifically for activities that require direct access to the runway and cannot be accommodated within the industrial land allocation of Table 6-2. This type of land is scarce and should not be used for other activities that do not require this access.	Disallow submission insofar as it requests that this policy provision be expanded to use airside land for purposes other than for direct access to the runway.
44.	77 Environmental Defence Society Inc	PRPS2 - 77.47	Policy 6.14 Density targets for Future Proof area	Support	Agree with the submitter's view that it is appropriate to have limits for new urban limits in specified areas and that new residential development shall occur in accordance with population triggers and sequencing to achieve specified density targets. We also agree with the submitter's request that the Future Proof area limit rural residential development particularly in the vicinity of Hamilton City. This aligns with the	Allow submission.

Submitter	Matter Number	Provision	Support / Oppose	Reason	Relief Sought	
				views set out in the FPIC submission given the intense patterns of rural residential development around the region especially in areas with high population and growth pressures like the Future Proof sub-region.		
45.	154 Meridian 37 Limited	PRPS2 - 154.5	Policy 6.14 Density targets for Future Proof area	Oppose	We oppose the submitter's request to delete Policy 6.14 in its entirety (or to insert a new strategic industrial nodes policy in its stead). Policy 6.14 gives statutory effect to the Future Proof sub-regional settlement pattern through the provision of target residential densities. Future Proof promotes a compact urban form and it is policy 6.14 which over time, will ensure that urban development becomes more compact.	Disallow submission.
46.	170 The Adare Company Limited	PRPS2 - 170.4	Policy 6.14 Density targets for Future Proof area	Oppose	The requested deletion of density targets is opposed because they form the basis for the sub-regional settlement pattern contained in the Future Proof Strategy. Future Proof also recognises that district plans are a key implementation tool.	Disallow submission.
47.	76 Tainui Group Holdings Ltd and Chedworth Properties Ltd	PRPS2 - 76.8	Policy 6.15 Commercial development in the Future Proof area	Oppose	The submitter seeks the deletion of this policy and its replacement with a policy that further acknowledges the role of The Base, including further refinement of the extent of The Base area. Policy 6.15 supports Future Proof principles and themes in relation to future commercial development eg supporting existing commercial centres, and encouraging development to support existing infrastructure. Other than amendments to this policy (set out in the FPIC submission) to better recognise the full range of activities within Titanium Park as part of the operative Titanium Park Plan Change (to the Waipa District Plan), this policy should be retained.	Disallow submission.
48.	77 Environmental Defence Society Inc	PRPS2 - 77.48	Policy 6.15 Commercial development in the Future Proof area	Support	Agree with the submitter's view that it is appropriate to have limits for new urban limits in specified areas and that new residential development shall occur in accordance with population triggers and sequencing to achieve specified density targets. We also agree with the submitter's request that the Future Proof area limit rural residential development particularly in the vicinity of Hamilton City. This aligns with the	Allow submission.

Submitter	Matter Number	Provision	Support / Oppose	Reason	Relief Sought	
				views set out in the FPIC submission given the intense patterns of rural residential development around the region especially in areas with high population and growth pressures like the Future Proof sub-region.		
49.	154 Meridian 37 Limited	PRPS2 - 154.6	Policy 6.15 Commercial development in the Future Proof area	Oppose	We oppose the submitter's request to delete Policy 6.15 (or to insert a new strategic industrial nodes policy in its stead). Policy 6.15 supports Future Proof principles and themes in relation to future commercial development eg supporting existing commercial centres, and encouraging development to support existing infrastructure. Other than the amendments to this policy set out in the FPIC submission to better recognise the full range of activities within Titanium Park as part of the operative Titanium Park Plan Change (to the Waipa District Plan), this policy should be retained.	Disallow submission.
50.	87 Ngati Koroki Kahukura Trust	PRPS2 - 87.26	Policy 6.15 (c)	Oppose	The submitter seeks to change the wording of this part of the policy so that the Hamilton CBD is recognised as "a key retail centre" but not the primary retail centre. This is opposed because Hamilton's CityHeart and suburban town centres (along with the sub-region's town centres) perform a vital role as commercial, employment, cultural, social and entertainment hubs of the sub-region. The Future Proof Strategy acknowledges that this has been reflected over time in considerable investment in public infrastructure, transport, footpaths, cycleways, open space, and community facilities. The success of Future Proof is linked to how well the city, suburban and town centres are planned and revitalized. But the City Heart/CBD has particular importance in both Hamilton and the sub-region because it functions as the primary business and commercial centre of the entire Waikato region. Currently this area accounts for about half of all the retailing found around the city. To not acknowledge its primacy as a retail centre would be a misstatement.	Disallow submission.

	Submitter	Matter Number	Provision	Support / Oppose	Reason	Relief Sought
51.	143 Porter Developments Ltd	PRPS2 - 143.4	Policy 6.15 (d)	Oppose	The submitter seeks to amend Policy 6.15(d) to provide exceptions for when industrial land can be used for commercial uses. It is considered that the policy already provides for a set of guidelines as to where/when commercial uses should be considered acceptable. The exceptions listed by the submitter would result in ad-hoc development contrary to a centres-based approach and is therefore opposed. It is for District Plans to consider the appropriate locations for commercial land in the context of the whole of Policy 6.15.	Disallow submission.
52.	143 Porter Developments Ltd	PRPS2 - 143.4	Policy 6.15 (e)	Oppose	The submitter's request to amend 6.15(e) to recognise that within the industrial area there is a wide range of use types ranging from mixed use through light industry to heavy industry is opposed because it is considered that the current drafting of the policy provision is sufficient, save for general amendments to the policy as a whole to account for the full range of activities permitted by the Operative Plan Change for Titanium Park.	Disallow submission.
53.	164 Gull Holdings Limited	PRPS2 - 164.2	Policy 6.15 (e)	Oppose	The submitter's request to amend 6.15(e) to recognise that an industrial area has a wide range of use types ranging from mixed use through to light industry and heavy industry is opposed as it is considered that the current drafting of the policy provision is sufficient, save for general amendments to the policy as a whole to account for the full range of activities permitted by the Operative Plan Change for Titanium Park.	Disallow submission.
54.	2 Ade, Rod	PRPS2 - 2.8	Policy 6.16 Rural-residential development in Future Proof area	Oppose in part	The submitter supports restrictions on rural-residential development but seeks to have section 6.16 removed until a further study has occurred. This is opposed as it is necessary to have a strong policy framework to manage the issue of continued fragmentation of rural land, particularly in the vicinity of Hamilton which, as set out in HCC's submission to the Proposed RPS, is experiencing a number of challenges in this area. It is also a Future Proof Strategy aim to address community expectations of tighter controls on rural residential	Disallow submission in accordance with the submissions made by HCC and the FPIC.

Submitter	Matter Number	Provision	Support / Oppose	Reason	Relief Sought
				development.	
55. 77 Environmental Defence Society Inc	PRPS2 - 77.49	Policy 6.16 Rural-residential development in Future Proof area	Support	Agree with the submitter's view that it is appropriate to have limits for new urban limits in specified areas and that new residential development shall occur in accordance with population triggers and sequencing to achieve specified density targets. We also agree with the submitter's request that the Future Proof area limit rural residential development particularly in the vicinity of Hamilton City. This aligns with the views set out in the FPIC submission given the intense patterns of rural residential development around the region especially in areas with high population and growth pressures like the Future Proof sub-region.	Allow submission.
56. 154 Meridian 37 Limited	PRPS2 - 154.7	Policy 6.16 Rural-residential development in Future Proof area	Oppose	The submitter's request to delete this policy and replace it with a proposed new policy on Strategic Industrial nodes is opposed. Policy 6.16 is important because it fulfils Future Proof's aim to address community expectations for tighter controls on rural residential development. It is important to retain this policy and ensure it is strong enough given that parts of the region are very intense in rural residential development patterns and other parts with high quality soil for rural/productive use is increasingly being compromised by rural residential development.	Disallow submission.
57. 159 Federated Farmers, North Waikato District	PRPS2 - 159.5	Policy 6.16 Rural-residential development in Future Proof area	Oppose	The submitter seeks a more permissive policy framework for rural-residential development. This is opposed for the reasons set out in the FPIC submission on why it supports this policy. It is a Future Proof Strategy aim to address community expectations of tighter controls on rural residential development.	Disallow submission
58. 77 Environmental Defence Society Inc	PRPS2 - 77.50	Policy 6.17 Monitoring development in Future Proof area	Support	Agree with the submitter's view that it is appropriate to have limits for new urban limits in specified areas and that new residential development shall occur in accordance with	Allow submission.

Submitter	Matter Number	Provision	Support / Oppose	Reason	Relief Sought	
				population triggers and sequencing to achieve specified density targets. We also agree with the submitter's request that the Future Proof area limit rural residential development particularly in the vicinity of Hamilton City. This aligns with the views set out in the FPIC submission given the intense patterns of rural residential development around the region especially in areas with high population and growth pressures like the Future Proof sub-region.		
59.	154 Meridian 37 Limited	PRPS2 - 154.8	Policy 6.17 Monitoring development in Future Proof area	Oppose	We oppose the submitter's request to delete this policy. Policy 6.17 should be retained because its provisions align with the monitoring and review provisions in the Future Proof Strategy and the level of information promoted within it will help to keep Future Proof decision makers adequately informed so that changes to Policy 6.13 on the land use pattern can be better assessed.	Disallow submission.
60.	178 Perry Group Ltd	PRPS2 - 178.5	Policy 6.17 Monitoring development in Future Proof area	Oppose	The submitter seeks the deletion of Policy 6.17 on grounds (among others) that market realities have not been taken due account of in establishing the Future Proof urban development pattern and that minimal consideration is given to the effect that the Future Proof land use pattern will have for land values of properties affected. This is opposed. Policy 17's provisions align with the monitoring and review provisions in the Future Proof Strategy and the level of information promoted within it will help to keep Future Proof decision makers adequately informed so that changes to Policy 6.13 on the land use pattern can be better assessed.	Disallow submission.
61.	77 Environmental Defence Society Inc	PRPS2 - 77.51	Policy 6.18 Review of Future Proof map and tables	Support	EDS supports this policy. The FPIC agrees with the submitter's view that it is appropriate to have limits for new urban limits in specified areas and that new residential development shall occur in accordance with population triggers and sequencing to achieve specified density targets. We also agree with the submitter's request that the Future Proof area limit rural residential development particularly in the vicinity of Hamilton	Allow submission.

Submitter	Matter Number	Provision	Support / Oppose	Reason	Relief Sought	
				City. This aligns with the views set out in the FPIC submission given the intense patterns of rural residential development around the region especially in areas with high population and growth pressures like the Future Proof sub-region.		
62.	154 Meridian 37 Limited	PRPS2 - 154.9	Policy 6.18 Review of Future Proof map and tables	Oppose	We oppose the submitter's request to delete this policy. It should be retained because it sets out the review of the Future Proof map and tables and its content is in line with Future Proof's collaborative approach.	Disallow submission.
63.	178 Perry Group Ltd	PRPS2 - 178.6	Policy 6.18 Review of Future Proof map and tables	Oppose	The submitter seeks the deletion of this policy as it thinks that the allocation approach adopted in Future Proof and incorporated into the Proposed RPS is too prescriptive and inflexible. We oppose this and consider Policy 6.18 should be retained because it sets out the review of the Future Proof map and tables and its content is in line with Future Proof's collaborative approach.	Disallow submission.
64.	178 Perry Group Ltd	PRPS2 - 178.10	Section 6A Development principles	Oppose	The submitter's request to delete section 6A from the Proposed RPS is strongly opposed. The FPIC considers the development principles in section 6A to be so important that they should be factored into resource consent decisions as well as other district plans and development mechanisms set out in Method 6.1.1 of the Proposed RPS.	Disallow submission.
65.	51 AgResearch, Corporate Office	PRPS2 - 51.4	Section 6A Development principles General development principles	Oppose	The submitter seeks that 6A General development principle (e) be amended to read that "New development... e) be directed away from <u>Agricultural Research Centres</u> , ...". We oppose this request because if allowed, there are significant implications for the proposed industrial land allocations at Ruakura in Table 6-2, as well as the subsequent modifications suggested in the FPIC submission.	Disallow submission
66.	184 Matamata Piako, Hauraki, South Waikato, Thames-Coromandel, Otorohanga and	PRPS2 - 184.77	Section 6A Development principles General development principles	Oppose	The submitter seeks to add 'with effects of regional significance' to the beginning of the general development principles in Section 6A. This would not have the effect of achieving Objective 3.11 or ensuring a planned and co-ordinated approach to developing the built environment. The	Disallow submission.

	Submitter	Matter Number	Provision	Support / Oppose	Reason	Relief Sought
	Waitomo District Councils				principles in Section 6A are to guide future development of the built environment, and the proposed change would not achieve this, and is therefore opposed.	
67.	184 Matamata Piako, Hauraki, South Waikato, Thames-Coromandel, Otorohanga and Waitomo District Councils	PRPS2 - 184.314	Section 6A Principles specific to rural-residential development	Oppose	The submitter seeks that all of the principles relating to rural-residential development should only apply where demand is high. However, all of the principles (except principle (a)) are relevant for the management of rural-residential development in any case, regardless of whether demand is high.	Disallow submission.
68.	189 Hauraki District Council	PRPS2 - 189.6	Section 6A Principles specific to rural-residential development	Oppose	The submitter seeks to delete these principles, or if retained want the definition of rural residential clarified. The inclusion of these principles as well as the more general development principles set out in 6A should be retained. Their inclusion within the Proposed RPS is strongly supported by the FPIC. They are important for the application of other policies and implementation methods in the Proposed RPS document such as Policy 6.1(a), and Implementation methods 6.1.1, 6.1.2 and 6.1.11.	Disallow submission
69.	178 Perry Group Ltd	PRPS2 - 178.7	Section 6C Future Proof map and tables	Oppose	We oppose the submitter's request to delete this section or amend Tables 6-1 and 6-2 in the manner suggested. Save for amendments set out in the FPIC submission, section 6C should be retained. It contains all the reference maps and tables which provide certainty for land use and infrastructure planning in the sub-region.	Disallow submission.
70.	86 Genesis Energy Ltd, Corporate Office	PRPS2 - 86.40	Map 6-1: Future Proof indicative urban limits	Oppose	The submitter opposes this map as it considers it is not appropriate to prescribe where infrastructure development may be required and requests it be deleted. The FPIC supported the inclusion of this map in the Proposed RPS. Map 6-1 should be retained as urban limits are an important part of ensuring that urban development occurs in a planned and integrated way in accordance with the land use pattern and sequencing that has been established through the Future Proof process.	Disallow submission.

	Submitter	Matter Number	Provision	Support / Oppose	Reason	Relief Sought
71.	114 Fonterra Co-operative Group Ltd, Te Rapa Site	PRPS2 - 114.38	Map 6-1: Future Proof indicative urban limits	Support	Agree with the submitter that Map 6-1 could be improved in terms of scale. The FPIC submission point #23 addresses our view on this issue i.e. that the word “indicative” be removed from the map title. The submitter also wants Hautapu identified on Map 6-1 as a Strategic Industrial Node. We agree with this as it aligns with the request in the FPIC submission at point #40 regarding amendments to Table 6-2 on industrial land allocation.	Allow submission.
72.	86 Genesis Energy Ltd, Corporate Office	PRPS2 - 86.41	Table 6-2: Industrial land allocation in the Future Proof area	Oppose	The submitter seeks the deletion of Table 6-2 which is an important part of the policy framework which implements the Future Proof settlement pattern. This is opposed by the FPIC as Table 6.2 is fundamental in ensuring that urban development occurs in a planned and integrated way in accordance with the land use pattern and sequencing that has been established through the Future Proof process. Except for the amendments to Table 6-2 set out in the FPIC submission, this table should be retained.	Disallow submission.
73.	154 Meridian 37 Limited	PRPS2 - 154.11	Table 6-2: Industrial land allocation in the Future Proof area	Oppose	<p>The submitter seeks substantial changes to the policy for industrial development, and seeks that the areas in Table 6-2 are minima, or that Table 6-2 is deleted. This is strongly opposed because it is important for certainty to set out industrial land allocations and timing. Table 6-2 as notified was informed by the Future Proof Business Land Review project as well as further investigations by the Future Proof partners. It is important to have Table 6-2 in the Proposed RPS to assist the District Plans in the sub-region with industrial land use. Table 6-2 has been informed by the inputs of the Future Proof sub-regional councils (i.e. HCC, Waipa DC, and Waikato DC).</p> <p>The Future Proof submission at point #40 set out a number of proposed amendments to Table 6-2 for a number of reasons eg taking account of the Pokeno and Tuakau settlements which are now a part of the Waikato District since November</p>	Disallow submission.

Submitter	Matter Number	Provision	Support / Oppose	Reason	Relief Sought
				<p>2010 as a result of the Auckland boundary changes, the findings of the North Waikato Strategic Industrial Node Study, and further work undertaken on the Ruakura Estate which was not available when the Proposed RPS was first notified.</p> <p>To delete Table 6-2 would deprive the sub-region, as a high development growth area, of the certainty it needs to operate more efficiently at the regional, sub-regional and local levels.</p>	
74.	171 Waikato Regional Airport Ltd	PRPS2 - 171.12	Table 6-2.; Industrial land allocation in the Future Proof area - Hamilton Airport	<p>Oppose</p> <p>The submitter considers that the Table 6-2 allocations for industrial land at the Airport are “incorrect” and “insufficient” and requests that the total allocation be raised to 197ha at the Airport (up from 152ha currently in the notified Proposed RPS).</p> <p>We disagree with this request. Given the provisions of Policy 6.13(f) of the notified Proposed RPS, there is no need to factor in all of the land which initially made up part of the 152ha Airport industrial land provision in Table 6-2 as notified. Hence the request in the FPIC submission (and supported by Waipa District Council (see submission point 92.50 of the summary of submissions volume 2)) to reduce the total Airport industrial land allocation from 152ha to 127ha.</p>	Disallow submission.