



Future Proof Implementation Committee
c/o Ken Tremaine
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23 February 2010

Waipa District Council
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BY EMAIL TO: submissions@waipadc.govt.nz

To Whom It May Concern,

RE: Submission to Plan Change 70, Waipa District Plan

This is a submission by the Future Proof Implementation Committee (“FPIC”) in **support** of Plan Change 70 Future Proof – Rural Residential Development to the Waipa District Plan (“PC70”).

The FPIC is the implementation arm of the Future Proof Growth Strategy (“Future Proof” or “Strategy”). It should be noted that while the FPIC includes representatives from the Future Proof sub-regional councils of Hamilton City, Waipa and Waikato Districts, the Waikato Region as well as tangata whenua, that the Waipa District Council (“Waipa DC”) has abstained from forming a part of this submission.

We support the purpose of PC70 being to implement the land use pattern defined in the Future Proof Strategy and in the Waipa 2050 District Growth Strategy pertaining to rural residential development. This approach aligns with a Future Proof Strategy priority action to have the Strategy’s council partners (which includes Waipa DC) to undertake the relevant changes to its district planning documents to align better with the Future Proof Growth Strategy, its District Growth Strategy, and the Waikato Regional Policy Statement: Proposed Change No.2 (Future Proof) (“Change 2”) which implements the Future Proof Growth Strategy framework in the Waikato Regional Policy Statement. The Resource Management Act 1991 requires district plans to give effect to their regional policy statements.

We understand that PC70 is a change in policy direction from the existing Waipa District Plan and that it does not seek to amend existing rules which will continue to apply.

The content of the FPIC submission follows overleaf.

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

Sincerely,

A handwritten signature in black ink that reads "Ken Tremaine". The signature is written in a cursive style with a large, sweeping initial "K".

Ken Tremaine
Future Proof Implementation Advisor

FPIC Submission

	PC70 Provision	Support or Oppose	Submission Detail	Relief Sought from the Waipa District Council
1.	1 Introduction, page 2	Support	<p>Support the move by Waipa DC to initiate PC70 so that the District Plan aligns better with Change 2 to the Waikato RPS, the Future Proof Strategy's settlement pattern in relation to rural residential development, and the Waipa 2050 District Growth Strategy ("Waipa 2050").</p> <p>This aligns with the integrated planning approach undertaken in the Future Proof Strategy.</p>	Retain.
2.	2 Background, pages 2-5.	Support	<p>Support the outlines given of the Waipa District and the importance of PC70 in light of:</p> <ul style="list-style-type: none"> • relevant actions in the Future Proof Growth Strategy; • relevant policies, explanations and methods in Change 2; and • Waipa 2050 which identifies the areas for rural residential development in the District and the level of anticipated development/population. <p>This outline aligns with the integrated planning approach undertaken in the Future Proof Strategy.</p>	Retain.
3.	3 Summary of Significant Resource Management Issues, 3.1 Issue – Rural Residential Development, pages 5-7.	Support	<p><i>Overview of rural residential issues in the Waipa District</i></p> <p>Support the explanation that one of two main land use drivers for subdivision increasing the intensity of development in the Waipa District is that of rural lifestyle blocks.</p> <p>It has been identified that within Waipa, 60% of all lots are between 2500m² and 10ha in size. The adverse effects of ad-hoc rural</p>	Retain.

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			<p>residential development is well documented and it is well known that such development impacts both the natural and physical environment and can reduce the options for the use of versatile soils and affect water quality, landscape character, amenity values and natural character. Of particular concern is that such development can (and has throughout NZ, caused demand for infrastructure provision that is untimely, expensive and inefficient.</p> <p>One of the key features of the Future Proof Strategy is the protection of versatile and productive farmland by directing rural residential development closer to towns and villages. This is in response to a major community expectation of tighter controls on rural residential development. This was a common theme expressed during Strategy consultation and development.</p> <p>It is also a Future Proof priority action to identify areas in and around existing towns which are appropriate for rural residential living (Priority Action 28) and a Future Proof monitoring action to monitoring growth management trends and drivers such as rural residential subdivision.</p> <p>A guiding principle of the Future Proof Strategy is to encourage development to locate adjacent to existing urban settlements and nodes in the Waipa District and that rural residential development occurs there in a sustainable way to ensure it will not compromise the Future Proof settlement pattern or create demand for the provision of urban services.</p> <p>Therefore the FPIC supports PC70's explanation of rural residential issues in the District as it aligns with the Future Proof Strategy.</p>	
4.	3 Summary of Significant	Support	<i>Proposal to amend policy direction of Policy RS67 of the Waipa</i>	Retain

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	<p>Resource Management Issues, 3.1 Issue – Rural Residential Development, pages 5-7.</p>	<p><i>District Plan</i></p> <p>Support the move to amend Policy RS67 of the Waipa District Plan. Policy RS67 is the governing policy on rural residential development in the District. Policy RS67 sets out the criteria for assessing the location of additional rural residential areas proposed by district plan changes.</p> <p>In particular, we support the reasoning for amending Policy RS67. We agree that in terms of the proposed changes in Change 2 to the Waikato RPS (particularly Policy 2: Adoption of long term land use pattern; Policy 4: Development Principles; and Policy 6: planning for rural residential development), Policy RS67 does not provide clear enough direction to encourage selected settlements to sufficiently grow in order to provide more services and to attract more people to them so that eventually better infrastructure can economically be provided for.</p> <p>We also agree that problems occur with Policy RS67 as currently worded because of ad-hoc and uncoordinated rural residential development.</p> <p>The current provisions of Policy RS67 does not allow the District Plan to sufficiently give effect to Change 2 as it enables Waipa DC to approve a plan changes for a rural residential area without regard to Change 2 when under section 75(3)(c) of the RMA 1991 the Council is required to.</p> <p>The current provisions of Policy RS67 does not provide clear enough direction to encourage development into the areas identified in the Future Proof Strategy and in Waipa 2050 as being economically, physically, socially and culturally feasible enough to</p>	

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		sustain growth. The FPIC therefore supports amending the policy direction of Policy RS67 so that it aligns better with Change 2 to the Waikato RPS, the Future Proof Growth Strategy and Waipa 2050.	
5.	3 Summary of Significant Resource Management Issues, 3.1 Issue – Rural Residential Development, pages 5-7.	<p>Support</p> <p><i>New Policies RS67A and RS67B</i></p> <p>The FPIC supports the PC70 proposals to:</p> <ul style="list-style-type: none"> • retain Policy RS67 to underpin non-operative proposals so that non-operative plan changes are still subject to the policy provisions that their applications were assessed against, but to amend and renumber it to Policy RS67A • Insert a new Policy RS67B to apply to all other situations 	Retain.
6.	3.3 Policy, pages 8-10.	<p>Support</p> <p><i>Amendments to Policy RS67 (new RS67A)</i></p> <p>Support amendments to current Policy RS67 (which becomes RS67A) that it applies to district plan change applications lodged before 1 December 2009 and where Waipa DC's decision on that proposed plan change has been issued but remains under challenge and is not yet operative.</p>	Retain.
7.	3.3 Policy, pages 8-10.	<p>Support</p> <p><i>New Policy RS67B</i></p> <p>Support the new Policy RS67B which sets out the criteria to be used (in conjunction with the relevant RPS provisions) to assess the location of additional rural-residential policy areas proposed by a district plan change application made under section 73 of the RMA 1991 or an application for a non-complying resource consent to establish new rural residential areas lodged after 1 December 2009.</p> <p>Support the criteria of Policy RS67B of 1.(a)-(b), and 2.(a)-(j) as</p>	Retain.

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		<p>they align with Future Proof Strategy (and Waipa 2050) approaches to limit rural residential development in areas proposed for new urban growth and directing rural residential development to areas identified for that purpose.</p> <p>From an integrated planning (and alignment perspective in particular), the FPIC supports the new assessment criteria of Policy RS67B insofar as it relates to applications for rural residential development received outside of the areas identified in Waipa 2050 such as:</p> <ul style="list-style-type: none"> • Encouraging rural residential development to locate in adjoining existing small settlements or existing rural residential areas provided that the anticipated population figures in Waipa 2050 are not exceeded; • Avoiding rural residential development in open landscapes free from development; • Incorporating criteria for airport protection and retention of the rural environment for existing rural uses; • Extending criteria relating to landscapes to include high quality as well as outstanding landscapes; • Avoiding development in areas of high quality soils and flood hazards. 	
8.	3.4 Proposed Changes to the Policy Explanation, pages 10-12.	<p>Support</p> <p>Support all the proposed changes to the Policy explanation of Policy RS67 to account for its amendment to Policy RS67A and a new Policy RS67B.</p> <p>In particular the FPIC supports the amendments to (ii) of the explanation which:</p> <ul style="list-style-type: none"> • Provides for Policy RS67B establishing a framework for 	Retain

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		<p>rural residential development that is consistent with both the Future Proof and Waipa 2050) growth strategies. Waipa 2050 was developed in tandem with Future Proof and sets out how, where and in what form Waipa's growth would occur up to the year 2050.</p> <ul style="list-style-type: none"> • Includes additional matters to have regard to in relation to the flexibility of village settlement boundaries e.g. protection and retention of the rural environment for rural uses and avoiding hazard prone areas, and the safe and efficient and effective connectivity with existing and planned transport infrastructure. • States that this policy addresses the location of rural residential development close to activities which may have an adverse effect on the operation of that activity. In particular that rural residential development should not be located in the vicinity of the airport or industrial zones to the extent that it would compromise or unduly limit those operations. This aligns with provisions in the Future Proof Strategy. 		
9.	4 Explanation and Principal Reasons for Adopting the Policy, pages 13-15.	Support	Support all the reasons set out in the Explanation and Principal Reasons for Adopting the Policy and in particular the aim of Policy RS67B to give effect to Change 2 and ensure that Future Proof Strategy principles were integrated and implemented through the land use planning functions undertaken by the Waipa DC.	Retain
10.	5 Environmental Results Anticipated, page 15.	Support	<p>Support the Environmental Results Anticipated in Section 5 of PC70. In particular the FPIC supports the approach of the nature and pattern of rural residential development in the Waipa District to:</p> <ul style="list-style-type: none"> • be that which directs rural residential development into preferred areas which do not conflict with foreseeable 	Retain

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		<p>needs for the expansion of existing urban areas;</p> <ul style="list-style-type: none"> • minimises the infrastructure and resource use conflicts and protects the efficiency of existing infrastructure including transport; • protects options for versatile farmland; and • protects and enhances rural character. <p>These provisions are all consistent with provisions in the Future Proof Strategy.</p>	