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SUBMISSION FORM

To Waikato Regional Policy
Statement – Proposed
Change No 2 – Future Proof

	Subform	RPSC2	COVER SHEET
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SUBMISSIONS CLOSE: 5.00pm Friday, 11 December 2009

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PLEASE NOTE:

Information on this form and the content of your submission will be made publicly available as part of the decision making process.

Please advise Environment Waikato if your contact details change

Do you wish to be heard in support of your submission?

Yes No

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

Yes No

Total Number of Pages:

9



Signature:

(signature of person making the submission or of person authorised to sign on behalf of person making the submission)

11 December 2009

Date:



18 November 2009

To:

The Chief Executive
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Name of Submitter:

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Submission:

This is a submission from the Future Proof Implementation Management Group ("FPIMG") on **Proposed Change No.2 to the Waikato Regional Policy Statement (FutureProof)** ("Change 2"). The FPIMG is the implementation arm of the Future Proof Growth Strategy ("Future Proof" or "Strategy") – the framework for which Change 2 implements. The FPIMG has submitted in support of the entire Change 2 and Section 32 Report documents.

It should be noted that as the regional council, Environment Waikato has abstained from forming a part of this submission.

We wish to be heard in support of our submission. If others make a similar submission we would be prepared to consider presenting a joint case with them at the submissions hearing. The content of our submission follows overleaf.

Sincerely,

Ken Tremaine
Future Proof Implementation Advisor

Future Proof IMG Submission

Provision	Support / Support with Amendments / Oppose	Reasons	Decision Sought
Whole of Section 32 report	Support	<p>The Section 32 report undertaken for Change 2 is wholly consistent with the Future Proof Strategy and Implementation Plan.</p> <p>The Section 32 Report provides a clear summary of the reasoning behind each policy (and its implementation methods and explanations and principal reasons). This report fulfils its requirements under section 32(3) of the RMA 1991 of an assessment by a regional council in preparing a regional policy statement or change to it, that the objectives set out in Change 2 are the most appropriate for achieving the purpose of the RMA 1991, and that the policies and methods are the most appropriate for achieving the objectives. The Section 32 Report clearly identifies the efficiency and effectiveness, costs, benefits and risks of each of its policies, and summarises this.¹</p>	Retain
Whole of Change 2	Support	<p>Change 2 is wholly consistent with the Future Proof Strategy and Implementation Plan and its preparation was a Future Proof Priority Action for strategy implementation. Specifically Change 2 implements several foundational 'Big Picture' elements of the Future Proof Growth Strategy such as:</p> <ul style="list-style-type: none"> ▪ Implementing a long term land use pattern ▪ Integrating land use and infrastructure, particularly transport ▪ A compact urban form ▪ 'Live, work and play' principles 	<p>Retain.</p> <p>That Change 2 be adopted and implemented in as close as possible a form to that publicly notified.</p>

¹ Section 32(5) of the RMA 1991 asks for a report *summarizing* the evaluation and we consider that has been done to a standard compliant with the Act.

Provision	Support / Support with Amendments / Oppose	Reasons	Decision Sought
		<ul style="list-style-type: none"> ▪ The sub-regional settlement pattern <p>The Future Proof Strategy was developed to manage growth in the sub-region (comprising Hamilton City, Waipa and Waikato Districts). Change 2 aims to provide a statutory basis under the RMA 1991, for giving effect to the direction set out in the Future Proof Strategy (developed under the framework of the LGA 2002 and which aligns with requirements under the LTMA 2003). Change 2 will provide the policy framework for district plans and consent decisions. Future decisions about land use change in the sub-region will need to align with Change 2 which better enables the sub-region to achieve the outcomes sought by the strategy partners.</p>	
3.16 Overview of Future Proof Growth Strategy	Support	The overview accurately sets out the intentions and scope of the Future Proof Strategy to manage growth in a collaborative manner for the benefit of the districts that make up the Future Proof subregion (Hamilton City, Waipa and Waikato Districts). This area is a high growth area in New Zealand both now and in the long term, and its proximity to other high growth areas like Auckland and Tauranga, and strong rural residential demand meant that its Councils were under increasing pressure to manage these pressures against its ability to service them. Future Proof and Change 2 offer a means for these Councils to do this.	Retain.
Summary of Significant Resource Management Issues	Support	This section summarises the adverse effects from development on the social, cultural, economic and environmental well being of the sub-region's people and communities. These issues have been expressed throughout the Future Proof Strategy consultation processes and are some of the issues that Change 2 seeks to address. The most significant issues for the sub-region include pressure to develop land outside of the key settlements	Retain

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		and uncoordinated land use and infrastructure planning.	
Policy 1 Governance Collaboration, implementation methods, and explanation and principal reasons for adopting the policy	Support	<p>IMG supports and advocates partner councils working collaboratively with respect to growth management in the Future Proof area.</p> <p>This policy, its implementation methods, and explanation/principal reasons are also consistent with a Future Proof Strategy priority action for the partners to continue to engage and discuss with the adjacent councils, matters related to managing growth across the territorial boundaries and develop appropriate policies and plans to deal with relevant issues. Policy 1 recognises the need for a continued collaborative effort by the strategy partners to effectively and sustainably implement the strategy.</p>	Retain
Policy 2 Adoption of long term land use pattern, implementation methods, and explanation and principal reasons for adopting the policy	Support	<p>This policy is critical to effective and sustainable growth management. It is important that development in the Future Proof sub-region be in accordance with the Future Proof settlement pattern.</p> <p>Policy 2 limits urban development to the land use pattern of the sub-region and sequencing that has been established to date through the Future Proof strategy process. While some flexibility is needed for development (which is achieved through policies 9 and 10), it is important to have certainty about the settlement pattern so that infrastructure can be planned for and integrated with land use.</p> <p>The urban limits approach in Change 2 aims to have sufficient land zoned for development now and into the future in order to achieve and sustain the Future Proof land use pattern effectively for the long term,</p>	Retain

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		<p>Furthermore this policy recognises that appropriate provisions need to be made for the servicing of this development. Other high growth regions such as Auckland, Bay of Plenty and Canterbury are currently using or near to implementing similar policies themselves. There is strong justification and a legal precedent established for the use of urban limits in regional policy statements for the purposes of growth management which is clearly the purpose of Change 2 and the sub-regional policy framework for Future Proof that it implements.</p>	
<p>Policy 3 Urban Form, implementation methods, and explanation and principal reasons for adopting the policy</p>	<p>Support</p>	<p>IMG supports this policy's promotion of residential density targets. Having density targets of 16 households per hectare in Hamilton Greenfields, and 12-15 in Waipa Greenfields areas and 8-10 in Waikato Greenfields areas will assist the sub-region with obtaining better net yields from greenfields land than has been achieved in the past. A main driving force behind this is to create more vibrant urban areas for people to live, work and play. It is also important in terms of using the land resource efficiently and effectively.</p> <p>Density is important in terms of determining land requirements and influencing urban form. The Future Proof Strategy is predicated on achieving a more sustainable urban form over time. The key means of achieving this is to restrain sprawl by increasing residential densities.</p>	<p>Retain</p>
<p>Policy 4 Development Principles, implementation methods, and explanation and principal reasons for adopting</p>	<p>Support</p>	<p>It is important to establish the development principles that will guide decisions that affect the built environment in the sub-region. This policy, its implementation methods, and its explanation and principal reasons aligns with a key approach in the Future Proof Growth Strategy that low-impact</p>	<p>Retain</p>

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the policy		urban design and development principles are an integral part of the design and development of new sites and those that are being redeveloped. ²	
Policy 5 Planning for Urban Development, implementation methods, and explanation and principal reasons for adopting the policy	Support	This policy, its implementation methods and explanation and principal reasons align with the matters outlined in the Future Proof Strategy to be included within this RPS Change. Unplanned or piecemeal development can create an urban form that is more energy intensive and less sustainable than more integrated land use patterns. ³ Establishing Structure Plan requirements for significant urban developments will help to ensure that urban growth is integrated with infrastructure and funding, and that the effects on natural resources are managed. This policy gives practical effect to the achievement of the development principles in policy 4 which align with the Future Proof Strategy.	Retain
Policy 6 Planning for Rural-Residential Development, implementation methods, and explanation and principal reasons for adopting the policy	Support	Requiring Future Proof territorial authorities to have district plan provisions which establish a planned regime for rural-residential development is in line with Future Proof Strategy principles, policies and priority actions on rural residential development. Given the significant amounts of productive land in the region, protection of versatile soils and rural resources should be enhanced by directing rural-residential development closer to towns and villages. This will also assist in reducing reverse sensitivity issues.	Retain
Policy 7 Co-ordinating Growth and Infrastructure, implementation methods, and	Support	The integration of land use and infrastructure planning (including transport planning) is a cornerstone of the Future Proof Strategy. A key driver behind this is sustainable land use which requires a comprehensive and long term	Retain

² Future Proof Growth Strategy and Implementation Plan 2009, page 113.

³ Future Proof Growth Strategy and Implementation Plan 2009, page 193.

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explanation and principal reasons for adopting the policy		<p>approach to where, when and how development takes place. This provides certainty for the residential and business communities in the sub-region, and ensures that the regional and local councils are better placed to comply with their statutory obligations under the three principal planning statutes of the RMA 1991, LGA 2002 and LTMA 2003.</p> <p>This policy, its implementation methods and explanation and principal reasons gives effect to section 30(1)(gb) of the RMA 1991 which requires regional councils to strategically integrate land use with infrastructure, and section 75(3)(c) requiring district plans to give effect to a regional policy statement. The aim of section 30(1)(gb) is to reduce the incidence of ad hoc planning and to achieve greater integration of infrastructure and land use, and give the RPS a more important status in strategic land use planning.</p> <p>This policy aligns with the Waikato Regional Land Transport Strategy (RLTS) by requiring coordination between land use and transport, protecting key transport assets and enhancing public transport. The RPS and the RLTS are two interconnected documents – their strategic alignment is key to effective land use and transport integration and sustainable development in the sub-region.</p>	
Policy 8 Monitoring Effectiveness, implementation methods, and explanation and principal reasons for adopting the policy	Support	Establishing requirements for monitoring and reporting on development and infrastructure trends and pressures in the Future Proof area is important given that the Future Proof Strategy strives to develop sound information upon which to base growth management policy. It is therefore imperative that the information used for growth management be kept up to date and that the data across the Future Proof partner councils is consistent.	Retain

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		Councils also have an obligation under section 35 of the RMA 1991 to gather information, and monitor and keep records. This policy, its implementation methods and explanation and principal reasons are all in alignment with that obligation.	
Policy 9 Minor Extensions to Urban Limits, implementation methods, and explanation and principal reasons for adopting the policy	Support	A policy allowing minor extensions to urban limits enables the Future Proof partner councils to provide for flexibility in relation to urban limits. IMG agrees with the councils acknowledging that urban activities can in some circumstances (where appropriate) occur outside the urban limits, for example where there is less land suitable for development within the urban limits than originally expected. IMG supports this policy, its implementation methods and its explanation and principal reasons.	Retain
Policy 10 Review Mechanism, implementation methods, and explanation and principal reasons for adopting the policy	Support	Establishing circumstances when a review of the settlement pattern maps and tables may be undertaken aligns with an approach to respond effectively and expediently to changes in the rate of growth.	Retain