



Future Proof Implementation Committee  
c/o Ken Tremaine  
Future Proof Implementation Advisor  
1601/18 Beach Road  
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AUCKLAND 1010

26 July 2012

The Chief Executive Officer  
Waipa District Council  
Private Bag 2402  
TE AWAMUTU 3840

Dear Sir

**FUTURE PROOF IMPLEMENTATION COMMITTEE SUBMISSION TO THE PROPOSED WAIPA DISTRICT PLAN (May 2012)**

This submission is lodged by the Future Proof Implementation Committee (FPIC) in **support** of the *Proposed Waipa District Plan* (Proposed Plan) notified on May 2012.

The FPIC is the implementation arm of the Future Proof Growth Strategy (Future Proof, or Strategy). The FPIC includes representatives from the Hamilton City Council (HCC), the Waipa District Council (Waipa DC), the Waikato District Council (Waikato DC), the Waikato Regional Council (WRC) and tāngata whenua. As the administering authority for the Proposed Plan, the Waipa DC has abstained from forming a part of this submission. The Future Proof partners may still make individual submissions.

The FPIC strongly supports the implementation of key aspects of the Future Proof Strategy within the Proposed Plan. It has adopted many of the key principles of the Strategy including promoting a live work play philosophy, consolidated urban areas and strategic links with infrastructure. The detailed matters of support are set out in our formal submissions attached to this letter.

The FPIC acknowledges that the Waipa DC has notified the Proposed Plan in advance of decisions being released on the Proposed Waikato Regional Policy Statement (Proposed RPS). The FPIC lodged submissions and presented a comprehensive set of evidence to the Proposed RPS, and some key provisions of the RPS have yet to be confirmed. FPIC encourages Waipa DC to monitor decisions planned to be released on the Proposed RPS in October 2012, and ensure the Proposed Plan consistently gives effect to those decisions.

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.

Yours sincerely

A handwritten signature in black ink on a light yellow background. The signature reads "Ken Tremaine" in a cursive, flowing script. The first letter 'K' is large and loops around the rest of the name.

Ken Tremaine  
**Future Proof Implementation Advisor**

## **General Comments**

The Future Proof Partners commend Waipa District Council on the Proposed Waipa District Plan, which implements key aspects of the Future Proof Growth Strategy, its key principles, and priority actions with regard to the implementation of the sub-regional settlement pattern, establishment of urban limits, and the allocation of strategic industrial land.

Given the importance of the Proposed Plan to implementing the Future Proof Strategy, the Future Proof Implementation Committee (FPIC) respectfully request that Waipa District Council give consideration to the following matters in their assessment of the submissions on the Proposed Plan. These matters are of importance to Future Proof Strategy implementation.

### **Consistency with Future Proof and the Proposed Regional Policy Statement**

The FPIC supports the high degree of consistency with the Future Proof Strategy and other regionally significant policy documents, as outlined in Section 1 (Strategic Framework Policy) of the Proposed Plan.. The FPIC considers that the Proposed Plan's objectives and policies are consistent throughout.

It is noted that the decisions version of the Proposed Regional Policy Statement (Proposed RPS) was notified following the notification of the Proposed Waipa District Plan. Any changes made to the Plan to reflect the Proposed RPS are supported.

### **Rural Residential Policies**

The FPIC supports the increased level of control Council has placed over subdivision activities in the Rural and Large Lot Residential Zones. The increased minimum lots sizes to subdivide will aid in the implementation of the Future Proof Settlement Pattern through focusing District growth in the existing towns and settlements, such as Cambridge and Te Awamutu.

The use of Transferable Development Rights (TDRs) and Benefit Lots as incentives for sustainable rural subdivision is also supported. These incentives provide protection from subdivision to the identified valued features of Waipa District while providing residents with housing options.

### **Industrial Land**

The FPIC supports the provision of industrial land in accordance with the Proposed RPS at the Hamilton Airport, Hautapu Industrial Estate and within the urban limits of existing urban areas. The FPIC considers that the objectives and policies in place for the Industrial Zone in relation to the Hautapu Industrial Estate will assist the Council in the expansion of commercial activities in the Cambridge Urban town centre by relocating the industrial land at Carter's Flat out to Hautapu.

The importance of industrial land, its servicing requirements, and its location in relation to regionally significant infrastructure has been duly noted in the Proposed Plan.

### **Airport Business Zone**

The FPIC supports provisions in the Proposed Plan which recognise that Hamilton Airport is significant regional infrastructure and that it should not be compromised by inappropriate development and land uses.

FPIC supports the development of an Airport associated business park featuring 'airside' businesses and industries. Future Proof supports the current limits in the Proposed Plan on the range and size of activities that are permitted in the Airport Business Zone. FPIC would like the Council to consider whether any further limits may be required for future development identified at the Airport which is currently subject to a deferred zone.

### **Integrated Transportation Assessments**

FPIC supports the intention of the Integrated Transport Assessments (ITAs) required in the Proposed Plan, but would like the Council to consider the following:

- The status of an activity being dependent on the thresholds established in Rule 16.4.2.20 of the Proposed Plan.
- The low thresholds for a simple and broad ITA established in Rule 16.4.2.20 of the Proposed Plan.

Together the rules associated with ITAs have the potential for an increased compliance cost for the development community and Council as it may result in an increased number of resource consents. FPIC understand that Hamilton City Council and NZTA are further examining the purpose and thresholds for ITAs in a District Plan context, and it might be beneficial for Waipa DC to also enter into these conversations to ensure ITAs achieve the outcome desired.

Specific submission points for consideration are provided overleaf.

Point	Proposed Plan Provision	Support/Oppose	Submission Detail	Relief Sought
1	General Comment	Support with Amendments	<p>The Proposed Waipa District Plan has been developed with reference to the Proposed RPS as Notified. It is expected that the Decision Version of the Proposed RPS will come out during the Waipa Plan submissions period.</p> <p>This submission point serves as a place holder for Future Proof to submit on specific details of the Plan to incorporate the changes to the Proposed RPS following the final decision publication unless the Council has lodged a submission of its own to cover this matter in which case Future Proof does not need to be involved.</p>	Support changes to the notified Plan that give effect to the decisions version of the Proposed Regional Policy Statement
2	<p>Map 3 – Zones and Policy Areas</p> <p>Map 7 – Zones and Policy Areas</p> <p>Map 16 – Rukuhia</p> <p>Map 36 – Pirongia</p>	Support with Amendments	<p>Strongly support the inclusion of Urban Limits from the Proposed RPS into the Proposed Plan.</p> <p>Amendments sought to include Pirongia and Rukuhia as areas within their own urban limits as provided in the Proposed RPS.</p>	<p>Retain the Urban Limits as identified in the planning maps</p> <p>Include urban limits for the settlements of Pirongia and Rukuhia consistent with the Proposed Regional Policy Statement</p>
3	Map 48 –Road Hierarchy	Support with amendments	The Proposed Plan includes a definition and planning map that identifies “District Roads”, which are defined as <i>collector and local roads that distribute traffic from collector roads and local roads to arterial roads</i> . It is unclear what the purpose is of identifying ‘district roads’ outside of the established road hierarchy. The Proposed Plan does not seem to use the term in the policy or regulatory framework, such as the road hierarchy in Chapter 16, or in the subdivision rules in Chapter 15.	Retain the Road Hierarchy Map, but consider removing ‘District Roads’.
<b>Section 1: Strategic Framework</b>				
4	1.1 – Introduction	Support	Future Proof supports the layout of the plan in the introduction and references to the Future Proof Guiding Principles in the Future Proof Growth and Implementation Strategy. Future Proof strongly supports paragraph 1.1.19 on the Future Proof Strategy under Regional	Retain

Point	Proposed Plan Provision	Support/Oppose	Submission Detail	Relief Sought
			Direction.	
5	1.2 – Resource Management Issues	Support	Future Proof supports the identification of the most significant resource management issues of the Waipa District and their inclusion in the Proposed District Plan.	Retain
1	Issue 1.2.5	Support with amendments	<p>Future Proof supports the inclusion of an issue that seeks to identify and protect the continuing operation and development of regionally significant infrastructure. In addition to gas and electricity transmission lines, the presence of regionally and nationally significant transportation corridors through the district should be included in this provision, consistent with the proposed RPS and operative Waikato RLTS.</p> <p>“Regionally important infrastructure” is an undefined term, and should be amended to refer to regionally significant infrastructure, consistent with the proposed RPS and elsewhere in the proposed District Plan.</p>	<p>Amend to read:</p> <p><i>There is also <u>nationally and regionally significant infrastructure such as transport corridors, electricity and gas transmission lines.</u></i></p> <p><i>The continued operation and development of these facilities, and of regionally significant infrastructure is a significant issue. New development can also compromise the ongoing operation of regionally important facilities and regionally <del>important</del> <u>significant infrastructure.</u></i></p>
2	1.3 – Objectives and Policies of the Strategic Policy Framework	Support	<p>The objectives and policies of the Strategic Policy Framework guide the development and implementation of the District Plan as a whole. They successfully incorporate the guiding principles of the Future Proof Growth Strategy.</p> <p>The objective and policies ensure that the District Settlement Pattern contributes towards the achievement of the Future Proof Settlement Pattern.</p>	Retain

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3	Objective 1.3.1 (b)	Support with amendments	<p>The objective supports a consolidated settlement pattern that supports the continued operation and development of regionally important sites and infrastructure which is supported by the FPIC.</p> <p>The Council should consider a minor text amendment so that the objective is better linked to sub-part (b) and so that regionally significant infrastructure is referenced given that this is defined in the Proposed Plan which is in line the Proposed RPS.</p>	<p>Amend objective 1.3.1 as follows:</p> <p><i>1.3.1 To achieve a consolidated settlement pattern that is:</i></p> <p><i>(a) <del>Is F</del>ocused in and around the existing settlements of the District; and</i></p> <p><i>(b) <del>That</del> <u>s</u>upports the continued operation and development of regionally important sites and regionally <del>important</del> <u>significant</u> infrastructure.</i></p>
4	Policy 1.3.1.1	Support	<p>The policies on the settlement pattern specifically note the Future Proof Strategy as one of the guiding strategies to be implemented through the Proposed Plan. These are strongly supported.</p>	Retain
5	Policy 1.3.1.2	Support in part	<p>Section 6.13 of the Proposed RPS states that new urban development within (among others) Cambridge, Te Awamutu, Kihikihi, Pirongia and Rukuhia shall occur within the Urban Limits indicated on RPS Map 6.2 under RPS section 6C.</p> <p>Urban limits are not provided for Pirongia or Rukuhia in the Proposed Waipa District Plan.</p>	Amend Policy 1.3.1.2(a) to include Pirongia and Rukuhia as towns within urban limits.
6	Policy 1.3.1.4	Support	<p>FPIC supports the policy to maintain industrial capabilities at the Hamilton Airport as prescribed in the Regional Policy Statement.</p> <p>The Activity Status Tables under Rule 10.4.1 permit a number of non-industrial activities within the Airport Business Zone, provided that the activities comply with Policy 1.3.1.4.</p>	<p>Retain with amendments</p> <p>Consider amending Policy 1.3.1.4 as follows:</p> <p><i>To enable a mixed use, industrial and business area</i></p>

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			Commercial activity should not be of a size or function that would compromise the vitality and viability of the primary commercial centres. Future Proof supports the limitations on these activities that the Proposed Plan has put in place. It is also noted that certain activities are prohibited as these are not appropriate for the Airport. Future Proof supports this approach. Council could consider strengthening this with the suggested text amendments provided under relief sought.	<i>with limited commercial activity that supports the Hamilton International Airport's role as a transport hub, and is within the land allocation specified by the Waikato Regional Policy Statement, <del>But is not of a</del> The commercial activity should not be of a large enough size or diverse enough function to compromise the vitality and viability of the primary commercial centres of Cambridge and Te Awamutu and the Hamilton central business district in the context of the sub-region.</i>
7	Policy 1.3.1.8	Support	This policy is supported as it identifies specific sites of significance in the Waipa District. The policy seeks to protect these sites by limiting noise sensitive activities on surrounding sites.	Retain the policy.
8	Policy 1.3.1.9	Support with amendments	This policy is supported as it seeks to manage the effects of development on regionally important infrastructure. The Proposed Plan includes a definition of <i>regionally significant infrastructure</i> and it would be helpful to refer to this in Policy 1.3.1.9.	Amend Policy 1.3.1.9 as follows: <i>Policy – Regionally <del>important</del> significant infrastructure</i> <i>1.3.1.9 To ensure that new development does not adversely affect the ability of regionally <u>significant</u> <del>important</del> infrastructure to continue to operate.</i>

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9	Policy 1.3.2.3	Support	Future Proof supports the policy on residential densities as this aligns with the Future Proof Strategy and the Proposed RPS. Achieving higher greenfields residential densities is a key aspect of the Future Proof settlement pattern and achieving a more compact urban form.	Retain
10	1.3.4.2 – Policy – Environmental and heritage protection	Support	Achieves the Future Proof Settlement Pattern and protects significant areas in conjunction with subdivision rules.	Retain
<b>Section 2: Residential Zone</b>				
11	Objective 2.3.4 – Providing housing options	Support	This objective aligns with the Future Proof Strategy’s objective to provide for a range of housing options with varying land values and amenities.  The policies under this objective support sustainable uses for land and existing infrastructure, as well as providing for in-fill, Papakainga and compact housing. The needs of an ageing population are also provided for.	Retain
12	Objective 2.3.5 – Comprehensive design and development	Support	This objective supports Objective 2.3.4 by mitigating and avoiding the adverse effects which increased densities can create in neighbourhoods.  The policies incorporate urban design principles which are supported in the Future Proof Strategy and ensures that large-scale residential development also accounts for infrastructural services necessary to support increased densities.	Retain
<b>Section 4: Rural Zone</b>				
13	Objectives 4.3.2 – 4.3.10 – Rural activities and Rural Amenity	Support	These objectives emphasise the form and function of the Rural Zone and recognise the importance of agriculture and agricultural industries within the Rural Zone, and the conservation of High Class Soils for such activities.	Retain

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14	Objective 4.3.12 – Non-farming activities	Support	This objective ensures that any inappropriate activities within the Rural Zone, which could have adverse impacts on agricultural activities and/or a reduction in land available for primary production purposes only occurs with genuine and compelling reasons.	Retain
15	Objective 4.3.13 – Tourism	Support	This objective recognises and provides for the nature and agricultural tourism, which has not been recognised in previous Operative Plans despite accounting for a significant share of the Sub-Region’s GDP.	Retain
<b>Section 6: Commercial Zone</b>				
16	Objective 6.3.1 – Role and function of commercial centres	Support	This objective introduces a District-level commercial hierarchy, which is aligned with the Proposed Regional Policy Statement commercial hierarchy.  The hierarchy identifies and defines the purposes and rankings of each commercial zone within the District.	Retain
<b>Section 7: Industrial Zone</b>				
17	Objective 7.3.1 – Function of the Industrial Zone	Support	This objective ensures that the limited Industrial Zoned land within the District is used for industrial purposes, recognising and upholding the Industrial Land Allocation defined in the Proposed Regional Policy Statement.  The quanta of Industrial Zoned land has been allocated throughout the sub-region based on the economically justified long-term objectives and strategies anchored in the Future Proof Growth Strategy.	Retain
18	Objective 7.3.4 – Hautapu Industrial Structure Plan Area	Support	This objective details the policies proposed to develop the Hautapu Structure Plan Area, to the north of Cambridge.  The policies ensure that the area will be effectively serviced and that development cannot occur prior to further provisions of public infrastructure being put into place by developers.	Retain

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19	Objectives 7.3.5 and 7.3.6 –  Bond Road North Industrial Zone and Industrial Zone: State Highway 21	Support	These objectives promote development of the identified industrial area in a manner consistent with Future Proof policies, namely the restriction of development prior to appropriate and efficient servicing being put into place on-site.	Retain
20	Rule 7.4.2.27 – Hautapu Industrial Structure Plan Area: Development Agreement	Support	<p>FPIC supports the non-complying activity status of any activity within the Hautapu Industrial Structure Plan Area prior to an agreement with Council ensures that the land release and timing is appropriate when compared to the level of servicing within the Structure Plan Area.</p> <p>The timed release of this structure plan area should align with the provisions in the Proposed Regional Policy Statement.</p> <p>FPIC also supports the infrastructure considerations which are detailed under Appendix S1 (Page S1-4) and will include:</p> <ul style="list-style-type: none"> <li>• Wastewater – upgrading of Cambridge Wastewater Sewer Bridge</li> <li>• Water – Cambridge North Trunk Main; Cambridge Reservoir; Cambridge Water Storage Upgrades; Hautapu Industrial Zone Link</li> <li>• Transport – Hautapu Rooding Upgrades to be discussed as part of the Development Agreement</li> </ul>	Retain
<b>Section 10: Airport Business Zone</b>				
21	Objective 10.3.1 – Strategic physical resource	Support	This objective is supported as it recognises the importance of the Hamilton Airport as a strategic resource for the Future Proof Sub-Region and gives effect to the Industrial Land Allocation quanta in the Proposed Regional Policy Statement.	Retain
22	Objective 10.3.2 – Provide for business park	Support	This objective is supported. The objective provides for industrial activities as identified in the Proposed Regional Policy Statement, but also provides for offices and retail activities as part of a business park concept.	Retain

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			<p>Policy 10.3.2.1 limits the retail activities to those which provide services to the Airport, business park users, and the immediate neighbourhood.</p> <p>FPIC acknowledges that the provisions of the Airport Business Zone were established by a plan change lodged prior to the Future Proof Strategy being adopted, and that Council and Waikato Regional Airport Limited have progressed development at the site over the past four years under the Titanium Park Joint Venture.</p> <p>Future Proof notes that there are further development expectations on land adjacent to the Hamilton Airport such as the Meridian 37 block. FPIC has lodged submissions against the Meridian 37 proposal and presented evidence at Council plan change hearings and at the RPS hearings. FPIC is a party to the Environment Court proceedings lodged by Meridian 37 against the decline of their Plan Change request.</p> <p>Whilst Hamilton Airport has been acknowledged as having potential for development, the nature and scale of this development should not undermine the core function of Hamilton International Airport, nor undermine the commercial and retail hierarchy identified and supported in both the Proposed RPS and the Proposed Plan.</p>	
<b>Section 13: Marae Development Zone</b>				
23	Whole section	Support	<p>A priority action for Future Proof is to ‘develop a definitive programme and protocol for papakāinga definition and successful development including facilitating the development of multiple owned Māori land.’ This section of the Proposed Plan facilitates the achievement of this priority action within the Waipa region and FPIC commends Council on this section.</p>	Retain
<b>Section 14: Deferred Zones</b>				
24	Deferred Airport Business Zone	Support in part	<p>Section 14 of the Proposed Plan establishes a management framework for the Deferred Zones identified in the Proposed Plan. FPIC supports</p>	Retain but consider whether the Airport Business Zone

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			<p>the inclusion of this management framework.</p> <p>Future Proof would like the Council to consider whether the current provisions of the Airport Business Zone which will apply to the areas identified in the Deferred Zone when they are developed, contain sufficient limitations to ensure that the range of activities included do not undermine the identified commercial centres or compromise the strategic nature of the Airport.</p>	rules contain sufficient limitations for future development areas
<b>Chapter 15: Subdivision</b>				
25	Section 15.2 Resource Management Issues	Support	FPIC considers that the resource management issues of the District are well described and include many of the core matters addressed in the Future Proof Strategy including rural fragmentation, integrated development and cultural heritage.	Retain
26	Section 15.3 Objectives and Policies	Support	FPIC commends Council on a very well developed set of objectives and policies pertaining to subdivision and integrated development patterns for the District	Retain
27	Rule 15.4.2.1 – Net Lot Area	Support	<p>FPIC strongly supports the minimum net lot area provisions necessary to achieve for a successful subdivision. The provisions are well aligned with the Future Proof Settlement Pattern and promote growth in existing towns and settlements within the District.</p> <p>This rule also limits the loss of prime agricultural land, reduces ad hoc rural-residential development and related adverse effects on existing infrastructure.</p>	Retain
28	Rules 15.4.2.68 – .76 – Transferable Development Rights	Support	<p>FPIC supports the use of Transferable Development Rights (TDRs) as incentives to protect areas within the District which have quantifiable and intrinsic values which would otherwise be lost or diminished through a subdivision process.</p> <p>FPIC also supports the effects of TDRs which guide rural residential</p>	Retain

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			development into areas with sufficient infrastructural capacity.	
29	Rules 15.4.2.68 – .76 – Benefit Lots	Support	<p>FPIC supports the provision of ‘benefit lots’ as incentives to protect areas within the District which have quantifiable and intrinsic values which would otherwise be lost or diminished through a subdivision process.</p> <p>Benefit lot provisions offer incentives for private initiatives in the protection and enhancement of the District’s most valued features. Together with TDRs, these provide legal methods for subdivisions while limiting the adverse effects of ad hoc subdivision. The process encourages an overall net benefit to the District, and to regional initiatives such as the Te Awa cycleway, vision and strategy for the Waikato River and protection of biodiversity.</p>	Retain
<b>Section 16: Transportation</b>				
30	Objective 16.3.1 – Ensuring sustainable, integrated, safe, efficient and affordable multi-modal land transport systems	Support	FPIC supports this objective and its policies, which ensure existing transport infrastructure is protected and that future transport infrastructure will be designed to allow safe and effective utilisation of alternative modes of transport.	Retain
31	Objective 16.3.2 – Integrating land use and transport: ensuring a pattern of land uses and a land transport system which is safe, effective and compatible	Support	FPIC supports this objective and its policies, which promote a more holistic consideration of the interactions between land use and transport infrastructure.	Retain
Point	Proposed Plan Provision	Support/Oppose	Submission Detail	Relief Sought

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32	Rule 16.4.2.20 – Provision of an Integrated Transport Assessment	Support in part	<p>The provisions requiring Integrated Transport Assessments are prescriptive rather than responsive – meaning that the need for an ITA will determine an activity’s status, rather than an activity’s status determining the need for an ITA. The traffic generation thresholds and their required assessment scope is defined in the table under Rule 16.4.2.20:</p> <table border="1" data-bbox="953 483 1646 1008"> <thead> <tr> <th data-bbox="953 483 1163 581">Vehicle Trips</th> <th data-bbox="1163 483 1402 581">Major and Minor Arterial Roads</th> <th data-bbox="1402 483 1646 581">Collector and Local Roads</th> </tr> </thead> <tbody> <tr> <td data-bbox="953 581 1163 646">0 – 100</td> <td data-bbox="1163 581 1402 646">Simple</td> <td data-bbox="1402 581 1646 646">Nil</td> </tr> <tr> <td data-bbox="953 646 1163 711">100 – 250</td> <td data-bbox="1163 646 1402 711">Broad</td> <td data-bbox="1402 646 1646 711">Simple</td> </tr> <tr> <td data-bbox="953 711 1163 776">&gt;250</td> <td data-bbox="1163 711 1402 776">Broad</td> <td data-bbox="1402 711 1646 776">Broad</td> </tr> <tr> <th data-bbox="953 776 1163 873">Heavy Vehicle Trips</th> <th data-bbox="1163 776 1402 873">Major and Minor Arterial Roads</th> <th data-bbox="1402 776 1646 873">Collector and Local Roads</th> </tr> <tr> <td data-bbox="953 873 1163 938">1 – 10</td> <td data-bbox="1163 873 1402 938">Simple</td> <td data-bbox="1402 873 1646 938">Broad</td> </tr> <tr> <td data-bbox="953 938 1163 1008">&gt;10</td> <td data-bbox="1163 938 1402 1008">Broad</td> <td data-bbox="1402 938 1646 1008">Broad</td> </tr> </tbody> </table> <p>These thresholds have the potential to require a wide range of otherwise permitted or controlled activities to be assessed as discretionary activities, requiring a more substantial resource consent application and specialist engineering advice.</p> <p>The Proposed Plan already contains a number of standards and terms relating to traffic, and the assessment criteria contained within the Proposed Plan for restricted discretionary and discretionary (21.1.16 on page 21-55) are already exhaustive.</p> <p>The principles of an ITA framework are positive, and the Proposed Plan</p>	Vehicle Trips	Major and Minor Arterial Roads	Collector and Local Roads	0 – 100	Simple	Nil	100 – 250	Broad	Simple	>250	Broad	Broad	Heavy Vehicle Trips	Major and Minor Arterial Roads	Collector and Local Roads	1 – 10	Simple	Broad	>10	Broad	Broad	<p>Retain with amendments:</p> <p>The need for an ITA to define activity status be reviewed.</p> <p>That the thresholds in the table be reviewed to ensure positive resource management outcomes are achieved.</p>
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			<p>is an ideal testing ground to prove their effectiveness in a planning context.</p> <p>Guidance on appropriate thresholds would assist both Waipa and Hamilton City Councils, and the Future Proof Transport Reference Group partnership is ideally placed to help the two Councils consider this matter further.</p>	
Section 21: Assessment Criteria				
33	21.2.15 – Infrastructure, Hazards, Development and Subdivision	Support in part	<p>FPIC supports in part the assessment criteria to be met for a subdivision resource consent process.</p> <p>FPIC seeks to include links between the assessment criteria with the design guidelines in Appendix DG of the Proposed Plan.</p>	Amend the table of 21.2.15 to include links between the assessment criteria necessary for subdivision and the design guidelines of the Proposed Plan.
34	21.2.16 - Transportation	Support in part	FPIC supports the use of Simple and Broad Integrated Transport Assessments for appropriate scenarios; however, opposes their use for the current range of potential activities.	Make any appropriate changes to the assessment criteria of 21.2.16 to reflect the amendment sought for Rule 16.4.2.20