

To submit electronically please go to: [www.waikatodistrict.govt.nz/pdp](http://www.waikatodistrict.govt.nz/pdp)

**Closing date for submissions: 5pm on Tuesday 9 October 2018**

**Submitter details:** (please note that the (\*) are required fields and must be completed)

First name*: Bill	Last name*: Wasley
Organisation: Future Proof Implementation Committee	
On behalf of:	
Postal address*: P O Box 13231	
Suburb:	Town/City*: Tauranga
Country: New Zealand	Postal code*: 3141
Daytime phone:	Mobile: 027 471 3006
Email address*: bill@wasleyknell.co.nz	
Please tick your preferred method of contact*	
<input checked="" type="checkbox"/> Email <input type="checkbox"/> Postal	
Correspondence to*	
<input checked="" type="checkbox"/> Submitter <input type="checkbox"/> Agent <input type="checkbox"/> Both	
Trade competition and adverse effects:*	
<input type="checkbox"/> I could <input checked="" type="checkbox"/> I could not gain an advantage in trade competition through this submission.	
<b>Note:</b>	
If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part I of Schedule I of the Resource Management Act 1991.	
Would you like to present your submission in person at a hearing?	
<input checked="" type="checkbox"/> Yes	
I do NOT wish to speak in support of my submission and ask that this submission be fully considered.	
If others make a similar submission I will consider presenting a joint case with them at the hearing (do not tick if you would not consider a joint case).	
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

<b>Please complete the following for every submission point:</b>
<b>Provision number</b> (e.g. 22.4.1.2 P2(a)):
Physical address of the property concerned (if relevant to your submission):
<b>Do you:</b> <input type="checkbox"/> Support <input type="checkbox"/> Oppose <input type="checkbox"/> Neutral

**Please see the attached for detailed submission points.**

<b>The decision I would like is:</b>

<b>My reasons for the above are:</b>

Signed: ..... Date: .....  
 (A signature is not required if you make your submission by electronic means)

PRIVACY ACT NOTE: Please note that all information provided in your submission will be used to progress the process for this proposed district plan, and may be made publicly available.



Future Proof Implementation Committee  
c/o Bill Wasley  
Future Proof Independent Chair  
P O Box 13231  
TAURANGA 3141

9 October 2018

Waikato District Council  
Private Bag 544  
NGARUAWAHIA 3742  
By e-mail: [districtplan@waidc.govt.nz](mailto:districtplan@waidc.govt.nz)

To whom it may concern

**FUTURE PROOF IMPLEMENTATION COMMITTEE SUBMISSION ON PROPOSED WAIKATO DISTRICT PLAN**

This submission is lodged by the Future Proof Implementation Committee (FPIC) largely in **support** of the *Proposed Waikato District Plan* notified on 18 July 2018.

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 Proposed District Plan, the Waikato DC has abstained from this submission. The Future Proof partners may still make individual submissions.

The FPIC supports the implementation of the Future Proof Strategy and the Waikato Regional Policy Statement settlement pattern through the Proposed District Plan. The detailed matters of support and amendment are set out in our formal submissions attached to this letter.

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

Bill Wasley  
**Independent Chair, Future Proof Implementation Committee**

The specific provision of the proposal that my submission relates to is:	State whether you support, support in part or oppose this provision	State the reasons for your views	I seek the following decision from the Council on this provision:
Section 1.4 - Issues	✓ Support	Future Proof supports the issues identified in section 1.4, in particular issue 1.4.4 on the urban environment. These issues are consistent with the principles of the Future Proof as outlined in section 1.3 of the Strategy.	Retain the issues outlined in section 1.4.
Section 1.12: Strategic Directions and Objectives for the District	✓ Support with amendment	The strategic directions and objectives for the Waikato District as outlined in section 1.12 are supported. Future Proof is of the view that these would benefit from having their own chapter. At present they are hidden in Chapter 1 – Introduction. There are also strategic objectives and policies contained in other chapters which could be moved or reiterated in a separate chapter on strategic directions and objectives. This would provide a strategic overview for the district plan in one place.	Retain the directions and objectives in section 1.12 but consider moving these into a standalone chapter with other strategic directions and objectives from various chapters.
Section 1.10.2.5	✓ Support with amendment	The references to the Future Proof Strategy in this section are supported as they provide important context. The Strategy was updated in 2017 and the timeframe for the settlement pattern has shifted to 30 years to be consistent with the National Policy Statement on Urban Development Capacity.	Retain the linkages to the Future Proof Strategy but update the text as follows: <i>The Future Proof Growth Strategy identifies <del>fifty</del> <u>thirty</u> year land supply needs in the subregion and proposes a sequenced release and development of the land according to its ability to be serviced by appropriate infrastructure and to be funded equitably. The <u>original</u> land use and settlement pattern has been incorporated in the Waikato Regional Policy Statement. This district plan gives effect to this settlement pattern through adopting policy direction, rules, and a zoning pattern for the Waikato district that is consistent with the WRPS and the Future Proof Growth Strategy.</i>
Chapter 4: Urban Environment	✓ Support	Future Proof generally supports the strategic direction outlined in section 4.1 as this is consistent with the	Retain the strategic direction outlined in section 4.1 including the policies for the urban areas. Note that

		<p>Future Proof Strategy<sup>1</sup> and the Future Proof Housing &amp; Business Development Capacity Assessment. Future Proof also supports the policies for each of the urban areas in the Waikato District as these are consistent with the direction set for these areas in the Future Proof Strategy. The objective on housing options (4.2.16) is also strongly supported as this is consistent with a key Future Proof principle relating to providing housing choices.</p> <p>There is work currently underway on a Hamilton-Auckland Corridor Plan. The the Proposed District Plan may need to be updated to reflect the outcomes of this work. In particular, changes to the policies for the urban environments may be required.</p>	these policies may require updating in order to reflect the Hamilton-Auckland Corridor Plan work.
Chapter 4: Urban Environment – 4.1 Strategic Direction	Oppose	While Future Proof generally supports the strategic direction outlined in section 4.1, we are of the view that greater distinction should be made between towns and villages, particularly from a growth perspective. <sup>2</sup> The focus of future urban growth should be in the townships.	Amend the strategic direction so that a distinction is made between the growth of towns and villages., resulting in a greater concentration of growth in the townships.
Chapter 4: Policy 4.1.5 – Density, Chapters 16-18 Rules, Planning Maps and any other relevant chapters	✓ Support with amendment	Future Proof supports policy 4.1.5 on density as this aligns with both the Future Proof Strategy (section 6.3, Table 2 on density targets) and the RPS (policy 6.15). The work underway on the Hamilton-Auckland Corridor Plan has highlighted the importance of public transport, and in particular the opportunities presented by passenger rail in the corridor. In the medium to long term passenger rail can have a transformative effect on land use. Future Proof submits that the Proposed District Plan should consider allowing for higher densities of development	Allow for higher density and mixed use developments close to transport hubs, especially train stations that have been signalled for potential re-opening, town centres and community hubs.

<sup>1</sup> For example, they are consistent with Future Proof principles contained in section 1.3 of the Strategy relating to towns and villages retaining their distinct identities, promoting increased densities in residential development and more intensive redevelopment of existing urban areas, encouraging development to locate adjacent to existing settlements and providing housing and lifestyle choice.

<sup>2</sup> See Future Proof principles relating to towns and villages retaining their individual and distinct identities - *Future Proof Strategy*, November 2017, page 10

		<p>close to train stations that have been signaled for re-opening and close to other key public transport routes or hubs. This would include encouraging mixed use developments around transport hubs (especially train stations), town centres and community hubs,. The Council should also consider allowing higher densities and mixed use development in Business Town Centre zones to encourage redevelopment and create vitality. Higher densities than the 12-15 households per hectare greenfields target will be required if we want to support good public transport and a more compact urban form. This is consistent with Future Proof principles relating to ensuring development is planned to support transport, including public transport provision and the need for stronger links between land use and transport.</p>	
<p>Chapter 4: Urban Environment, Chapter 16: Residential Zone, Planning Maps plus other linked chapters</p>	<p>Oppose in part</p>	<p>Future Proof supports the additional land identified in key growth areas such as Tuakau, Pokeno and Te Kauwhata. This is in line with the Future Proof Strategy (see section 6.2 on Growth Management Areas), the RPS (see Policy 6.14 and section 6D, table 6-1) and work completed as part of the Northern Waikato Programme Business Case with the NZ Transport Agency.</p> <p>However, we have concerns around the approach of ‘live’ zoning significant areas of land rather than undertaking a more staged approach, eg through the use of future urban zones. Some of the areas that have been zoned for development have uncertainties around provision of infrastructure.</p> <p>If the live zoning approach is to be used then the Council should consider a much stronger approach to staging which is tied to the provision of infrastructure and structure planning.</p>	<p>Review the extent of the live zoning and its ability to be serviced with infrastructure. If this zoning approach is to be used then the Council should consider including much stronger development staging rules which are linked to the provision of infrastructure and the development of structure plans.</p> <p>Also, consider alternatives to live zoning, including:</p> <ul style="list-style-type: none"> <li>▪ Using a rural zone with an overlay similar to the ‘Hamilton Urban expansion’ overlay proposed in the plan;</li> <li>▪ Application of the urban zone, but with an overlay that would signal that while particular areas are considered appropriate particular activities, e.g. industrial or residential, additional subdivision and development will not be considered until there is certainty about infrastructure provision;</li> </ul>

		<p>The National Policy Statement on Urban Development Capacity requires that development capacity must be feasible, zoned and serviced with development infrastructure for the short term, or that the funding for development infrastructure required must be identified in the Long-Term Plan or Infrastructure Strategy for the medium and long-term.<sup>3</sup></p> <p>It is important that growth areas are adequately planning for and funded. A piecemeal approach to infrastructure servicing, including on-site infrastructure, could compromise the ability of these areas to grow in the future. There are also significant funding implications of not servicing development or undertaking a staged approach, this includes the ability to collect appropriate development contributions under the Local Government Act 2002. An integrated approach to land use, infrastructure and funding is consistent with Future Proof Strategy principles which set out that the settlement pattern should align with the partners long-term plans and that development should be encouraged within established settlements to support existing infrastructure.<sup>4</sup></p>	<ul style="list-style-type: none"> <li>▪ Creation of a new Urban Expansion Zone that would have its own suite of provisions for management of land use and subdivision activities;</li> <li>▪ Use of a future urban zone to clearly signal that additional land would need to be serviced by infrastructure and structure planned before it could be zoned for urban development.</li> </ul>
Chapter 4: Urban Environment and Chapter 24: Village Zone	Oppose	<p>Future Proof supports the concept behind the village zone. However, we are concerned about the extent of this zone around key growth areas. This could undermine the objective of having a more compact urban form. Achieving a more compact and concentrated urban form over time is a key outcome of the Future Proof settlement pattern.<sup>5</sup></p>	<p>Review the extent of the village zones while working with Hamilton City Council within the area which impacts them.</p>

<sup>3</sup> Policy PA1, *National Policy Statement on Urban Development Capacity 2016*

<sup>4</sup> Section 1.3, *Future Proof Strategy*, November 2017

<sup>5</sup> See sections 2.1, 7.2, 11.1, 11.4 of the *Future Proof Strategy*, November 2017

		<p>The Proposed District Plan indicates a minimum density of 8-10 households per hectare for sites in the Village Zone where public reticulated services can be provided – it will be much lower density if onsite servicing is undertaken. This could have the effect of encouraging a dispersed land use pattern around the main townships and could compromise efficient infrastructure servicing.</p> <p>Future Proof submits that further investigation and structure planning should be undertaken for these areas to ensure that a compact urban form is being promoted and a sustainable approach is taken. This could include having a residential rather than a village zone around or close to the growth areas, such as Tuakau, which encourages a more concentrated form of development which is more effectively serviced and funded. One example of a wide village zone is in Tuakau.</p> <p>Future Proof is also of the view that Waikato DC and Hamilton City Council should work closely together on the extent of the village zone around areas close to the boundary with Hamilton City, such as that indicated in the Hamilton Area of Interest Map attached to Hamilton City Council’s submission, so as not to compromise future strategic land use plans.<sup>6</sup></p>	
4.1.16: Policy – Horotiu and associated rules and maps	Oppose	<p>The Future Proof Strategy and the RPS identify Horotiu as a Strategic Industrial Node. As raised elsewhere in this submission, it is important that sufficient industrial land is provided to allow for growth in this area. Land at Horotiu should be safeguarded to ensure that this can happen. The additional residential development at Horotiu is opposed at the present time given the</p>	<p>Review and amend the provisions relating to additional residential growth at Horotiu given the demands for industrial land and the need to do further cross-boundary and infrastructure investigations.</p>

<sup>6</sup> See section 6.5, *Future Proof Strategy*, November 2017

		demand for industrial land and the proximity to the boundary with Hamilton City including any physical and social impacts. It is important that any land use changes are carefully worked through so that a better integration between land use and future infrastructure can be achieved and any environmental effects managed. Future Proof will work alongside Waikato District to assist with achieving this outcome.	
Whole Plan - Hamilton-Auckland Corridor Plan and Future Proof Phase 2 Update	✓ Support with amendment	There is work underway producing the Auckland-Hamilton Corridor Spatial Plan, and also carrying out the Phase 2 update of the Future Proof Strategy. These two processes may result in changes to the settlement pattern of the Waikato District. It is understood that if the changes are significant that a variation to the Proposed District Plan may be required. This submission serves as a signal for any amendments that may arise from these processes which are more minor in nature and should be incorporated into the Proposed District Plan.	Amend relevant Proposed District Plan provisions and maps to provide for outcomes identified in the Auckland-Hamilton Corridor Plan and the Future Proof Strategy Phase 2 Update, and Waikato DC local area blueprints.
Section 4.3: Village Zone including Policy 4.3.3 Future development –Te Kowhai, Chapter 24 Village Zone Rules, Chapter 27: Te Kowhai Airpark Zone, Planning Maps	Oppose	<p>While Future Proof supports Waikato District selecting a village to grow such as Te Kowhai<sup>7</sup>, this is based on the proviso that investigations are completed, servicing is in place and there is Future Proof partner agreement to this approach. as this village is signalled in the Strategy as an area for future development.<sup>8</sup> This is because it is a means of providing for growth and encouraging this to occur around an existing village rather than dispersed rural-residential development.</p> <p>Given the proximity of Te Kowhai to the Hamilton boundary, it is important that any development is of a</p>	Amend the provisions relating to the growth of Te Kowhai. Future Proof is of the view that additional growth should not occur at Te Kowhai until further detailed structure planning work is undertaken and until servicing is put in place. as part of any future three waters strategic work focus on completing an infrastructure plan that provides for more intensified urban development with reticulated services. This plan needs to be put in place occur before development is considered. Wider infrastructure and facilities matters should also be incorporated such as transport and community facilities.

<sup>7</sup> Section 6.4, *Future Proof Strategy*, November 2017

<sup>8</sup> Future Proof, *Housing and Business Development Capacity Assessment, 2017 – Summary Report*, at page 29

		<p>form and scale that it can be integrated into the City's infrastructure networks in the future.<sup>9</sup></p> <p>Future Proof is of the view that there are two important things that must occur before this area is further developed:</p> <ol style="list-style-type: none"> <li>1. Building on the work of the Ngaruawahia and Surrounds Structure Plan and the Te Kowhai Blueprint, a detailed structure plan / infrastructure plan or similar should be prepared for the whole area which looks out over 30 years and considers what services are required (three waters, transport and community facilities).</li> <li>2. The area should be properly serviced by infrastructure or a plan put in place for this to happen before the area is zoned.</li> </ol> <p>This will allow for a planned approach and will mean that the area can realise its growth potential. Waikato DC should work closely with Hamilton City Council, the NZ Transport Agency and other partners on the development of this area.</p>	
Chapter 5: Rural Environment, Chapter 22: Rural Zone, Maps	Support in part	<p>Retain this chapter subject to giving consideration and effect to the Hamilton Area of Interest, including through supporting objectives, policies, rules and methods, and planning maps.</p> <p>Future Proof supports the idea of a cross boundary area between Hamilton City and Waikato District such as that shown on the Hamilton Area of Interest Map attached to the Hamilton City Council submission. However, we are of the view that this will require further investigation, in particular the cross-boundary land use effects.</p>	<p>Further work needs to be undertaken on the objectives, policies, rules and methods that cover the cross-boundary area between Hamilton City and Waikato District. This may involve amending the Rural Environment and Rural Zone provisions. Any further work needs to occur through an evidence-based, collaborative approach involving all relevant parties, which ensures that land use within the cross boundary or Hamilton Area of Interest is managed appropriately.</p>

<sup>9</sup> See section 6.5, *Future Proof Strategy*, November 2017

		<p>Future Proof considers that:</p> <ul style="list-style-type: none"> <li>▪ Any cross boundary or area of influence will need to be determined via an evidence base. This is fundamental given the third party rights that the RMA 1991 confers.</li> <li>▪ Objectives, policies, rules and methods need to emanate from the evidence</li> </ul> <p>There needs to be a strategic, integrated approach to this work and Future Proof wishes to work alongside the Hamilton City Council, and the Waikato District Council to assist this outcome.</p>	
Rules: Chapters 20 & 21, Planning Maps and any other consequential amendments	Support in part	<p>Future Proof is concerned that there may not be enough industrial zoned land provided at Horotiu given the demand that has been demonstrated in this area. The Future Proof Housing and Business Development Capacity Assessment has found that industrial land demand in Waikato District is high.<sup>10</sup> The Future Proof Strategy identifies that Horotiu will become a substantial inland freight hub and employment area.<sup>11</sup> It is important to ensure that there is enough land zoned given the large areas required for an inland port, and that it is staged appropriately. Both Future Proof and the RPS make provision for additional industrial land to be added and for land to be brought forward provided certain criteria are met.<sup>12</sup></p>	In conjunction with any other related submissions received which demonstrate market demand, review the amount of land zoned at Horotiu for industrial purposes.
Rules: Chapter 22: Rural Zone	Oppose	<p>The Urban Expansion Area overlay has been in place for some time as it covers land related to the strategic agreement between Waikato District Council and Hamilton City Council to transfer land within the policy area from Waikato District to Hamilton City to allow for future urban expansion. It is important that this land is not compromised before that transfer occurs</p>	Amend the activity status for non-rural activities within the Urban Expansion Area to have a Prohibited Activity status.

<sup>10</sup> Future Proof, *Housing and Business Development Capacity Assessment 2017 – Summary Report*, at page 29

<sup>11</sup> Section 6.1, *Future Proof Strategy*, November 2017

<sup>12</sup> Section 7.5 *Future Proof Strategy*, November 2017 and Methods 6.14.2 & 6.14.3 of the Waikato Regional Policy Statement

		through fragmentation or non-rural activity use of the land. Otherwise the ability to use this land efficiency for future urban development is restricted. <sup>13</sup> The rules around this need to be strict as they are under the Operative Waikato District Plan.	
Cross boundary integration – Chapters 4, 5, 14, 16 – 24, Planning Maps and any other relevant sections	Support in part	Future Proof notes and supports statements in the Proposed District Plan relating to cross boundary pressures with both Auckland and Hamilton. <sup>14</sup> We are of the view that the Waikato District Council should continue to work closely with Auckland Council and Hamilton City Council. In particular on any specific actions arising from the Hamilton-Auckland Corridor Plan. For success these will require a partnership approach. Through the Future Proof partnership, Waikato DC and Hamilton City Council should work closely on the area of interest to Hamilton City. This wider partnership also involves the Waikato Regional Council, Waipa DC, the NZ Transport Agency and tangata whenua.	Review provisions that relate to areas affected by cross boundary pressures to ensure that the Proposed District Plan can deal with these challenges. This may involve joint planning initiatives in conjunction with the implementation tools of the Hamilton – Auckland Corridor Plan.

<sup>13</sup> Note section 6.5 of the *Future Proof Strategy*, November 2017

<sup>14</sup> Cross boundary issues are an important feature of the Future Proof Strategy (see sections 1.4, & 3.3)