

File No: 25 05 00
Document No: 8851628
Enquiries to: Greg Morton

23 August 2016

Waikato District Council
Private Bag 544
Ngaruawahia

Email: Districtplan@waidc.govt.nz

Dear Sir/Madam

Waikato Regional Council Submission to Waikato District Council Plan Change 16 – Tuakau Structure Plan

Thank you for the opportunity to provide feedback on the above. Please find attached the Waikato Regional Council's submission in regard to the Waikato District Council Plan Change 16 – Tuakau Structure Plan. The attached submission from Waikato Regional Council was approved by our Strategy and Policy Committee on 9 August 2016.

Should you have any queries regarding the content of this document please contact Greg Morton, Team Leader Policy Implementation, directly on (07) 859 0999 or by email greg.morton@waikatoregion.govt.nz.

Regards

Tracey May
Director Science and Strategy

Submission by

Waikato Regional Council

PLAN CHANGE 16 – TUAKAU STRUCTURE PLAN – STAGE 1

25 July 2016

1.0 INTRODUCTION

- 1.1 Waikato Regional Council (WRC) appreciates the opportunity to make a submission to Waikato District Council's Plan Change 16 – Tuakau Structure Plan 2014 (TSP). We note that the Plan Change will implement stage 1 of the TSP to rezone land over the 2016-2026 period. The Plan Change will provide associated planning provisions for residential and rural residential growth, and will facilitate industrial growth by including the expansion of the existing Whangarata Business Park. The purpose of the TSP is to provide a strategic and spatial framework for future land uses, open space, transport and utility networks.
- 1.2 This Plan Change has links to regional development and the desired outcome of WRC to help enable economic development that is coupled with an improvement in our natural assets. It is also of interest to Future Proof as it helps ensure effective growth management across the combined Hamilton city, Waikato and Waipa districts area particularly in regard to the influence of growth occurring in Auckland on this sub-region.
- 1.3 WRC along with infrastructure providers such as the NZ Transport Agency, view integrated land use and transport planning as an important method to help implement the Tuakau Structure Plan and achieve desired growth management goals. The proposed Northern Waikato Programme Business Case, being led by the NZ Transport Agency with support from key stakeholders including WRC and Waikato District Council, is evidence of this.

2.0 SUBMISSION

- 2.1 **WRC supports in part and is neutral in part regarding** the provisions of the proposed Plan Change. WRC has specific comments regarding how the proposed zone changes give effect to the Operative Waikato Regional Policy Statement (RPS). In particular, Section 6 Built Environment, and specifically policies 6.12 and 6.13 to 6.19 and the Development principles outlined in 6A. In summary:
- 2.2 Where new residential zoning is proposed, WRC **supports** the more intensive use of these areas for residential housing. WRC considers that areas of medium-high residential density development are desirable where there is good connection and proximity to the Tuakau town centre. WRC considers that these residential areas should be used as efficiently as possible within the constraints of infrastructure provision.
- 2.3 Where new industrial and light industrial zoning are proposed, WRC **supports** the extension of these areas to provide local employment opportunities, provided the issues of appropriate infrastructure provision and reverse sensitivity effects are adequately addressed.

- 2.4 Where country living zoning is proposed, WRC **neither supports nor opposes** the proposed Country Living Zone at Barnaby Road and Harrisville Road. WRC considers that rural residential development should be more strongly controlled in parts of the region where demand is high and would like to see a greater evaluation of the proposed zone in respect of the provisions of the RPS.
- 2.5 In respect of the application of new chapter 15C and new Schedules 21E, 24G and 27B, WRC is not clear about the relationship between these provisions and the application of the conservation policy areas, ecological corridors, environmental enhancement overlays, environmental protection policy areas, gully areas and similar policy areas and schedules associated with management of the natural environment. We note there gully area overlay on areas subject to the structure plan. This area is not identified on the Planning Maps. As such, WRC **neither supports nor opposes** the new provisions in chapter 15C and the Schedules 21E, 24G and 27B, but seeks better understanding of the relationship between these mechanisms and the new provisions.
- 2.6 In respect of the interaction between the provisions contained in the Plan Change and the Regional Land Transport Plan (RLTP), WRC considers that the proposed plan change can be generally **supported** as it is broadly consistent with the outcomes sought in the RLTP, and in particular an integrated approach to planning and development. WRC notes that the Plan Change will provide greater certainty for future transport investment and will encourage a more compact form (through the provision of higher density development) to improve the efficiency of the transport network. However, WRC would like to better understand the relationship between the growth in population/increased industrial land provision and the impact this might have on the Waikato Expressway and other strategic routes.

3.0 THE OPERATIVE WAIKATO REGIONAL POLICY STATEMENT – INDUSTRIAL AND LIGHT INDUSTRIAL ZONING.

Policy 6.12 Implementing Franklin District Growth Strategy

The Franklin District Growth Strategy (2007) provides for the management of growth in the part of the Waikato and Hauraki Districts that was the former Franklin District. Growth should be managed in accordance with this Strategy. In particular:

- a) management of the built environment should be in accordance with the general visions and development directions described for the relevant towns and rural character areas in Sections 7 and 8, and Map 1.0 of the Franklin District Growth Strategy; and*
- b) new industrial development should predominantly be located in the strategic industrial nodes in Table 6-3.*

The Franklin District Growth Strategy applies until the Future Proof Growth Strategy and relevant district plans are amended.

- 3.1 Industrial and Light Industrial Zoning – Whangarata Road: Policy 6.12b) of the RPS indicates that new industrial development should predominantly be located in the strategic industrial nodes in Table 6-3. WRC notes that the proposed rezoning in this area will have the result of adding approximately 7.3 hectares to the existing 92 hectares of the Tuakau strategic industrial node set out in Table 6-3. WRC accepts that this is in general accordance with the FDGS, being directly adjacent to an existing Tuakau Industrial Services Zone and in

reasonable compliance with the industrial zoning depicted on Map 77 of the Franklin District Plan.

Table 6-3: Industrial land allocation in the North Waikato

Strategic Industrial Nodes located in the North Waikato (based on gross developable area) ¹	Industrial land allocation and staging (ha)			Total Allocation 2010 to 2061 (ha)
	2010 to 2021	2021 to 2041	2041 to 2061	
Tuakau	116	0	0	116
Pokeno	92	0	0	92
TOTAL HA	208	0	0	208

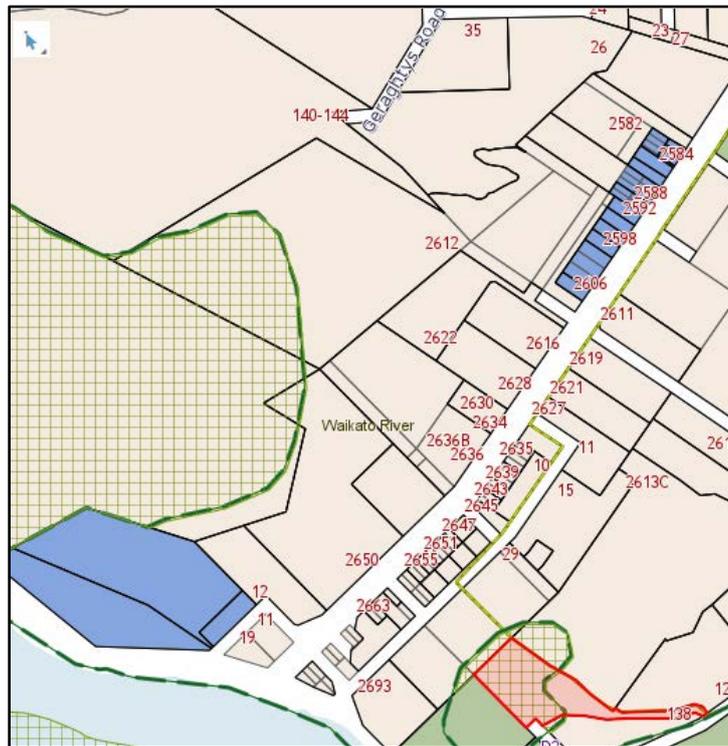
¹gross Developable Area includes land for building footprint, parking, landscaping, open space, bulk and location requirements and land for infrastructure including roads, stormwater and wastewater facilities.

Explanation
The land identified in Table 6-3 for the Tuakau and Pokeno Strategic Industrial Nodes represents the zoned and vacant industrial land provided for within the Waikato District Plan at each location.

- 3.2 Industrial and Light Industrial Zoning – River Road: WRC notes that the ‘Overall Zoning and Staging Map’ on page 5 of the Summary Statutory report indicates stage 1 rezoning to light industrial and industrial zones along areas of River Road as follows:



- 3.3 This rezoning is not indicated in the map amendments. The Franklin section of the Waikato District Plan indicates rural zoning with two pockets of business zoning as below:



- 3.4 WRC wishes to clarify that these areas are not subject to rezoning as part of Plan Change 16. WRC would not be supportive of rezoning these areas without further analysis and evaluation in respect of Policy 6.12b) of the RPS.

4.0 THE OPERATIVE WAIKATO REGIONAL POLICY STATEMENT – NEW RESIDENTIAL ZONING

Policy 6.15 Density targets for Future Proof area

Hamilton City Council, Waipa District Council and Waikato District Council shall seek to achieve compact urban environments that support existing commercial centres, multi-modal transport options, and allow people to live, work and play within their local area. In doing so, development provisions shall seek to achieve over time the following average gross density targets:

Development type and location	Average gross density target
Hamilton Central Business District	50 households per hectare
Hamilton Intensification Areas	30 households per hectare
Hamilton Greenfield (Rototuna, Rotokauri, Ruakura Peacocke)	16 households per hectare
Greenfield development in Cambridge, Te Awamutu/Kihikihi, Huntly, Ngaruawahia, Raglan/Whaingaroa and Te Kauwhata	12 – 15 households per hectare
Greenfield development in Waikato District rural villages where sewerage is reticulated	8 – 10 households per hectare

- 4.1 While the Future Proof Strategy does not technically apply to the Franklin Section of Waikato District, the Strategy’s development principles generally align with those contained in the FDGS and are considered applicable to the proposed Plan Change. Policy 6.15 seeks to ensure that over time, urban development will become more compact through the promotion of development density targets. This is to seek improvement in areas including the viability of

public transport, the efficient use of infrastructure and a reduction of urban sprawl onto highly productive soils.

- 4.2 WRC notes that the RPS provisions as they apply to the Franklin District Growth Strategy (FDGS), are adequately addressed in the plan change. There is acknowledgement that some of the residential rezoning in PC16 falls outside of the urban boundary shown on the Maps in section 7 of the FDGS. In particular this applies to stage 1 areas to the north-west and north-east of the township. Policy 6.12a) of the RPS indicates that the management of the built environment should be in accordance with the general visions and development direction described in the FDGS. WRC considers that the stage 1 residential areas provide adequate compliance with the policy direction and as such, can be considered to give effect to the RPS.
- 4.3 Information provided as part of the Summary Statutory Report for Plan Change 16 indicates that Tuakau's population is anticipated to grow substantially from an approximate population of 4766 in 2016 to around 8666 in 2045. The Franklin District Growth Strategy indicated that the population was not expected to reach 4298 people by 2021 and 5927 by 2051. The unanticipated pressure on Tuakau's growth is heavily influenced by its proximity to Auckland and to the major transportation networks. WRC is supportive of the Plan Change's intention to address the immediate need for additional residential land.
- 4.4 WRC considers that the "new residential" areas proposed can be supported as follows:
- Provision for greenfield residential development on the northern side of Buckland Road between the west of Tuakau's existing residential area and the Tutaenui Stream (Map 1). WRC supports the TSP estimates of 682 new dwellings for this 'new residential' zone. The use of Buckland Road and the Tutaenui Stream as defendable boundaries is also supported.
 - Rezoning existing Rural Residential blocks and selected rural blocks at the southern end of the township to provide for more intensive residential development (Map 4). WRC notes these areas are largely within the urban limits in the FDGS and identified as 'Areas C, D and E'. WRC also notes that the land proposed for residential rezoning in Map 4 is immediately adjacent to the existing industrial zone. The Plan Change documents state that provisions in the Tuakau Industrial Zone (TIZ) and the proposed Schedule 24G address potential adverse effects from industrial activities to ensure that reverse sensitivity effects from industry on adjacent residential development are satisfactorily managed. This includes the imposition of odour buffers. The Plan Change documents also indicate that the vegetated buffer and esplanade reserve areas on both sides of the Kairoa Stream will be vested in Council to further manage the adverse effects of industrial activities upon residential areas. Given these mitigation measures, WRC is supportive of the rezoning.
 - WRC is also supportive of the zoning of selected rural blocks on the northern and southern sides of Dominion Road to provide for more intensive residential development (Map 3). The area to the north is encapsulated by a small gully/wetland system that separates it from the balance farm area and provides good demarcation between the proposed residential area and adjacent rural land.
 - Rezoning selected blocks on Harrisville Road and the northern and southern sides of Barnaby Road. WRC is supportive of addressing existing anomalies on Harrisville Road and the intention to rezone the 6524m² property located at 15 Barnaby Road

from Rural to New Residential. This is considered to be an efficient use of land in proximity to existing residential areas.

5.0 THE OPERATIVE WAIKATO REGIONAL POLICY STATEMENT – COUNTRY LIVING ZONING.

Policy 6.17 Rural-residential development in Future Proof area

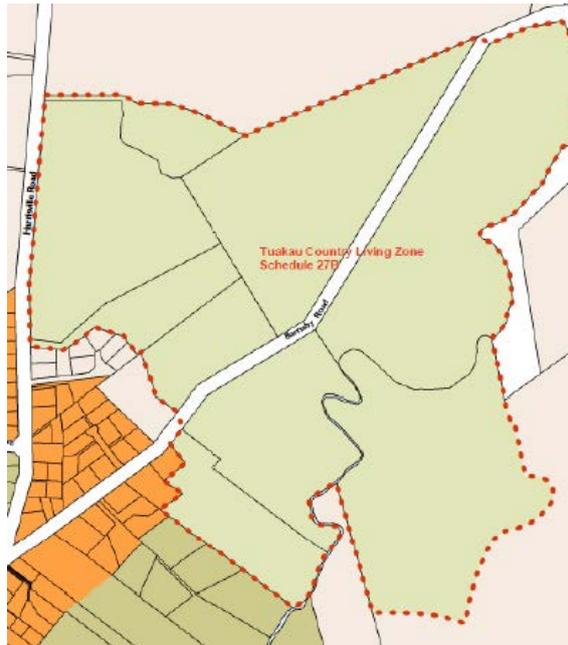
Management of rural-residential development in the Future Proof area will recognise the particular pressure from, and address the adverse effects of, rural-residential development in parts of the sub-region, and particularly in areas within easy commuting distance of Hamilton and:

- a) the potential adverse effects (including cumulative effects) from the high demand for rural-residential development;*
- b) the high potential for conflicts between rural-residential development and existing and planned infrastructure and land use activities;*
- c) the additional demand for servicing and infrastructure created by rural-residential development;*
- d) the potential for cross-territorial boundary effects with respect to rural-residential development; and*
- e) has regard to the principles in section 6A.*

- 5.1 WRC considers that rural residential development should be more strongly managed where demand is high (such as in the northern part of Waikato District), and should not conflict with foreseeable long-term needs for expansion of existing urban centres. Section 6A of the RPS contains general and rural-residential specific development principles. In respect of these principles, WRC neither supports nor opposes the proposed rezoning to a “Tuakau Country Living Zone” at Barnaby Road and Harrisville Road. WRC considers that a specific assessment of the proposed rezoning against the provisions of the RPS should be undertaken as part of the assessment included in Section 4.1.3 of the Summary Statutory Report. This should include consideration of Policy 6.1, Method 6.15 and 6.1.8.
- 5.2 WRC also seeks to understand the boundaries of the area which appear to differ between the Part A and Part C Reports. The maps are referenced and attached below and appear to differ in shape and encroach into the Stage 2 area adjacent to Harrisville Road.



Part A Summary Statutory Report – Tuakau Structure Plan – Overall Zoning and Staging
2016-2046) Page 5



Part C – Schedule 27B: Tuakau Country Living Zone – Barnaby Road Page 69

6.0 THE OPERATIVE WAIKATO REGIONAL POLICY STATEMENT – GULLY SYSTEMS, WETLANDS AND OTHER AREAS OF INDIGENOUS BIODIVERSITY.

Policy 8.3 All fresh water bodies

Manage the effects of activities to maintain or enhance the identified values of fresh water bodies and coastal water including by:

a) reducing:

- i) sediment in fresh water bodies and coastal water (including bank instability) that is derived from human based activities;*
- ii) accelerated sedimentation of estuaries;*
- iii) microbial and nutrient contamination;*
- iv) other identified contaminants; and*

b) Where appropriate, protection and enhancement of:

- i) riparian and wetland habitat;*
- ii) instream habitat diversity;*
- iii) indigenous biodiversity; and*

c) providing for migratory patterns of indigenous freshwater species up and down rivers and streams and to the coastal marine area where practicable; and

d) avoiding:

- i) physical modification of fresh water bodies where practicable; and*
- ii) inappropriate development in flood plains; and*

e) managing:

- i) groundwater and surface water flow/level regimes, including flow regime variability;*
- ii) linkages between groundwater and surface water; and*
- iii) pest and weed species where they contribute to fresh water body and coastal water degradation.*

Policy 11.1 Maintain or enhance indigenous biodiversity

Promote positive indigenous biodiversity outcomes to maintain the full range of ecosystem types and maintain or enhance their spatial extent as necessary to achieve healthy

Ecological functioning of ecosystems, with a particular focus on:

- a) working towards achieving no net loss of indigenous biodiversity at a regional scale;*
- b) the continued functioning of ecological processes;*
- c) the re-creation and restoration of habitats and connectivity between habitats;*
- d) supporting (buffering and/or linking) ecosystems, habitats and areas identified as significant indigenous vegetation and significant habitats of indigenous fauna;*
- e) providing ecosystem services;*
- f) the health and wellbeing of the Waikato River and its catchment;*
- g) contribution to natural character and amenity values;*
- h) tāngata whenua relationships with indigenous biodiversity including their holistic view of ecosystems and the environment;*
- i) managing the density, range and viability of indigenous flora and fauna; and*
- j) the consideration and application of biodiversity offsets.*

- 6.1 In respect of the application of new chapter 15C and new Schedules 21E, 24G and 27B, WRC is not clear about the relationship between these provisions and the application of the conservation policy areas, ecological corridors, environmental enhancement overlays, environmental protection policy areas, gully areas and similar policy areas and schedules associated with management of the natural environment. As such, WRC seeks better understanding of the relationship between these mechanisms and the new provisions.

7.0 FURTHER INFORMATION AND HEARINGS

- 7.1 Should the Waikato District Council wish to discuss the points raised by WRC, or require additional information, please contact Greg Morton at Greg.Morton@waikatoregion.govt.nz or on 0800 800 401.
- 7.2 WRC **does wish to be heard** at the hearings for Plan Change 16 in support of this submission.