



**Proposed Private Plan Change 21  
Graham Block Development**

Waikato District Plan – Franklin Section

Submission form

ECM Project: DPC21-03  
ECM # .....  
Submission # .....

RMA Form 5

**Submitter**

Please print

This form will be photocopied. Please do not print outside the frame.

Name: Future Proof Implementation Committee \_\_\_\_\_ (Mr / Mrs / Ms / Miss)

Contact person: (if applying on behalf of an organisation) Bill Wasley, Future Proof Independent Chair

Address for correspondence: P O Box 381, Tauranga 3141 \_\_\_\_\_

Phone: 027 471 3006

E-mail: bill@wasleyknell.co.nz

Fax: \_\_\_\_\_

I could  / could not  gain an advantage in trade competition through this submission.

I am  / am not  directly affected by an effect of the subject matter of the submission that:

- (a) ~~Adversely affects the environment; and~~
- (b) ~~Does not relate to trade competition or the effects of trade competition~~

**This is a submission on Private Plan Change 21**

Please use a separate form for each provision of the Plan Change you wish to submit about

The specific provision of the Plan Change that my submission relates to is Whole of the Plan Change

Other identification – eg Attachment, Paragraph \_\_\_\_\_

I ~~do not~~ **support**  ~~oppose~~  ~~seek amendments~~  **to the provision named above.**

**The reasons for my / our views are**

Details of our submission are contained overleaf.

**I / We seek the following decision from the Waikato District Council:** (give precise details)

Future Proof supports Proposed Plan Change 21. We seek that its provisions be retained and that the Plan Change be upheld.

I / We wish to be heard in support of my / our submission:

Yes  No   
Yes  No

If others make a similar submission, I / we will consider presenting a joint case with them at hearing:

Signed: \_\_\_\_\_ Date: 9 Oct 2017

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

Please return this form **no later than 4pm on 13 October 2017** to:  
Waikato District Council, 15 Galileo Street, Private Bag 544, Ngaruawahia 3742; OR  
Fax 07 824 8091; OR e-mail [districtplan@waidc.govt.nz](mailto:districtplan@waidc.govt.nz)



Future Proof Implementation Committee  
c/o Bill Wasley  
Future Proof Independent Chair  
P O Box 381  
TAURANGA 3141

12 October 2017

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 PLAN CHANGE 21 (GRAHAM BLOCK DEVELOPMENT - POKENO) TO THE WAIKATO DISTRICT PLAN - FRANKLIN SECTION**

This submission is lodged by the Future Proof Implementation Committee (FPIC) in **support** of *Proposed Plan Change 21 (Graham Block Development - Pokeno) to the Waikato District Plan – Franklin Section (PC21)*.

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 PC21, the Waikato DC has abstained from forming a part of this submission. The Future Proof partners may still make individual submissions.

The FPIC supports the plan change as it forms part of the Future Proof Strategy settlement pattern. The detailed matters of support 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:
Whole of Plan Change	✓ Support	In general, the whole of PC21 is supported by Future Proof. When the Future Proof Strategy was first developed Pokeno was not part of the sub-region. The Future Proof Strategy is currently being updated and will incorporate Pokeno as a growth area for Waikato District Council. It is a key principle of the Future Proof Strategy to encourage development into existing settlements and growth areas.	Retain as notified.
Appendix 54.15A – Pokeno Structure Plan Area	✓ Support	<p>Future Proof supports the changes to the structure plan area including:</p> <ul style="list-style-type: none"> <li>▪ Rezoning the Plan Change Area from Rural to Residential 2 Zone;</li> <li>▪ Removing the Large Lot Overlay from the northern extent of the Plan Change Area;</li> <li>▪ Applying the Large Lot Overlay to the southern extent of the Plan Change Area;</li> <li>▪ Incorporating the Plan Change Area into the existing Pokeno Structure Plan Area.</li> </ul>	Retain as notified.
Plan Change Report – general comment	✓ Support with amendment	Future Proof generally supports the Plan Change Report <sup>1</sup> , however it would be useful if the documentation referenced the Future Proof Strategy and the Waikato Regional Policy Statement, in particular part 6 on the built environment. Under section 75(3)(c) of the RMA 1991 the District Plan must give effect to the Regional Policy Statement. Under section 74(2)(b)(i) of the RMA 1991 any plan changes shall also have regard to management plans and strategies prepared under other Acts – Future Proof was prepared under the framework of the Local Government Act 2002.	Reference the Future Proof Strategy and the Waikato Regional Policy Statement in the plan change documentation.

<sup>1</sup> Private Plan Change 21: Graham Block Development, August 2017, prepared for Pokeno Village Holding Ltd by MWH/Stantec



**TRANSPORT AGENCY SUBMISSION ON:**

**PROPOSED PRIVATE PLAN CHANGE 21 – GRAHAM BLOCK DEVELOPMENT**

**In accordance with Schedule 1 of the Resource Management Act 1991**

**TO:** Waikato District Council  
Private Bag 544  
**NGĀRUAWĀHIA 3742**

**REFERENCE:** ECM Project: DPC21-03

**SUBMITTER:** NZ Transport Agency  
PO BOX 973  
Waikato Mail Centre  
**HAMILTON 3240**

**ATTENTION:** Jenni Fitzgerald

**PHONE:** 07 958 7957

**E-MAIL:** jenni.fitzgerald@nzta.govt.nz

**Introduction**

1. This submission relates to **Proposed Private Plan Change 21 – Graham Block Development (PPPC21)**.

**The NZ Transport Agency's Role**

2. The NZ Transport Agency (the Transport Agency) is a Crown entity with the sole powers of control for all purposes of all State Highways. The Transport Agency is also a significant investor in the local road network. The Transport Agency's objective, functions, powers and responsibilities are derived from the Land Transport Management Act 2003 (LTMA), and the Government Roadway Powers Act 1989 (GRPA).

The statutory objective of the Transport Agency is to undertake its functions in a way that contributes to an effective, efficient and safe land transport system in the public interest<sup>1</sup>.

### **The Transport Agency's Submission**

3. The NZ Transport Agency notes that PPC21 may be inconsistent with the Waikato Regional Policy Statement 2016 (RPS) and the Future Proof Growth Strategy (Future Proof). The NZ Transport Agency supports these documents and the processes that led to their development, having invested significant resources in both. Both of these documents look to ensure an integrated approach is taken to managing growth within the Waikato Region. The dwelling density that would be achieved by PPC21 is inconsistent with the Future Proof density target of 12-15 households per hectare. PPC21 documents refer to a land area of 26ha which '*...is anticipated to accommodate the development of 100 standalone residential dwellings*'. This is significantly less than the targeted density.
4. The Agency acknowledges that changes to the land use pattern for Pokeno are currently being proposed through the Future Proof Growth Strategy review and the North Waikato Integrated Growth Management Programme Business Case; but these are not yet finalised. Notwithstanding this, the Agency considers that the broader strategic framework and development principles are well understood and accepted. The Agency considers that ideally PPC21 should be consistent with the outcomes of these two projects, including the Future Proof density targets; and regardless must be assessed against the RPS, including Section 6A. We note that the plan change documents refer to topographical constraints meaning that part of the site is best suited to 'large lot' development. However the Residential 2 zoning sought for the remainder of the site would achieve a density of approximately 10 households per hectare which is less than the applicable density identified in Future Proof and the RPS. There is no analysis or consideration in the plan change documentation that justifies this against the RPS. The only reference to PPC21 giving effect to the RPS is in relation to protecting areas of significant indigenous vegetation.
5. North Waikato is experiencing unprecedented growth in population and demand for housing and other development. This growth is largely driven by the growth being experienced in Auckland. Auckland has a current population of 1.6 million people and this is expected to grow by an additional million people over the next 30 years. This continued growth will increase pressure and demand in north Waikato. The pace of growth is challenging the ability of service providers (including Waikato District Council) to future proof decision making.

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<sup>1</sup> LTMA Section 94

6. As Waikato District Council staff will be aware there are currently multiple processes underway to better understand the scope, scale and impact of growth on north Waikato. These include:
- the North Waikato Integrated Growth Management Programme Business Case currently being developed jointly by the Transport Agency, Waikato District Council, Waikato Regional Council, Hamilton City Council, Auckland Council and Auckland Transport. The purpose of this piece of work includes developing a high level land use strategy for north Waikato and to use this to identify future essential community services, local transport needs, and inter-regional transport infrastructure. This project is expected to be recommended to the respective organisations for adoption later in 2017. Whilst it is recognised that this business case is still in draft form, it does provide direction that Pokeno will be a key residential growth node for the north Waikato over the next 30 years.
  - the Future Proof Strategy Review. One of the key information streams is the review of population projections for the Future Proof area which have led to recommendations for changes to the Future Proof settlement pattern, including expansion in Pokeno. The current Future Proof growth strategy was developed prior to Pokeno becoming part of the Waikato District and therefore does not include reference to Pokeno. The draft Strategy was notified on the 12<sup>th</sup> of June and as notified now includes the north Waikato settlements including Pokeno in the proposed settlement pattern and density targets. Density targets for greenfield development in Pokeno are 12-15 households per hectare<sup>2</sup>.
7. Both of the projects identified above will produce information that is highly relevant, if not critical, to effective planning for growth and land use change. At the same time WDC is progressing its full district plan review. The Transport Agency considers that it will be important to test the assumptions used to develop PPPC21 against the updated information, once available.
8. We acknowledge that the plan change subject area does not include any state highway infrastructure; however, development in this area has the potential to impact on the function of the nationally significant Waikato Expressway. In addition, the Transport Agency has an interest in this plan change as a co-investor in the local transport network. The NZ Transport Agency requests that the Hearings Committee ensure it is satisfied that PPPC21 promotes an integrated approach to managing growth and infrastructure generally, and specifically by giving effect to higher level documents.

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<sup>2</sup> Draft Future Proof Growth Strategy – Planning for Growth May 2017; Page 30; Table 1 Future Proof and RPS density targets. <http://www.futureproof.org.nz/file/draft-future-proof-strategy-update-120617-final-draft.pdf>

9. The NZ Transport Agency in principle supports the intent of Proposed Private Plan Change 21 inasmuch as it provides for urban development within an existing urban area. The subject land is a logical extension of Pokeno Village. Notwithstanding this, the Transport Agency is not satisfied on the basis of the plan change documentation as notified that sufficient consideration has been given to the appropriate strategic framework and higher order RMA documents; or that the requested zoning change will not undermine the outcomes sought in these. For example, PPPC21 Section 1.2 refers to:

- giving effect to the National Policy Statement for Urban Land Supply [sic] – we assume this is intended to be reference to the National Policy Statement on Urban Development Capacity 2016 (NPSUDC). The only justification or explanation for how PPPC21 gives effect to the NPSUDC is that it enables “the release of greenfield land to support the residential growth which has occurred within Pokeno to date”. The Transport Agency notes that Objective Group B, C and D in the NPSUDC have a strong focus on robust and up-to-date evidence being used to inform planning decisions; planning for short-, medium- and long-term wellbeing; local authorities adapting and responding to evidence; and coordination and alignment within and across local authority boundaries. These objectives are all evident in the processes referred to in paragraph 6; processes which WDC is a party to.
- giving effect to WDC’s District Growth Strategy 2007. No mention is made of the Waikato District Development Strategy adopted by WDC in 2015, which was prepared to replace and update the Waikato District Growth Strategy (2009) and the Franklin District Growth Strategy (2008)<sup>3</sup>. Notwithstanding the fact the earlier strategy has been replaced, the only justification or explanation for how PPPC21 gives effect to it is the same as for the NPSUDC outlined above.
- supporting and giving effect to the strategic approach within the Council’s District Plan. There is no discussion of what this strategic approach is or how PPPC21 supports and/or gives effect to it.
- supporting and giving effect to the Waikato Regional Policy Statement “by protecting areas of significant indigenous vegetation”. The RPS has a much broader focus and application than this.

10. The Transport Agency respectfully suggests that the Council cannot be satisfied on the basis of the information provided that Proposed Private Plan Change 21 meets the necessary statutory tests, including in particular giving effect to the RPS. No or insufficient analysis against the higher level documents has been provided in the information notified. The Transport Agency considers that in addition to giving effect to the RPS, PPPC21 should be not inconsistent with outcomes of the Future Proof review. Pokeno is a key node for urban growth within the north Waikato and as such it is

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<sup>3</sup> Waikato District Development Strategy (September 2015), p3. [https://wdcsitefinity.blob.core.windows.net/sitefinity-storage/docs/default-source/your-council/plans-policies-and-bylaws/strategies/waikato-district-development-strategy---final-report.pdf?sfvrsn=16c4b6c9\\_4](https://wdcsitefinity.blob.core.windows.net/sitefinity-storage/docs/default-source/your-council/plans-policies-and-bylaws/strategies/waikato-district-development-strategy---final-report.pdf?sfvrsn=16c4b6c9_4)

imperative that future land use recognises this and is consistent with Waikato District Council aspirations for the long term development of the Pokeno community.

11. The Transport Agency opposes Proposed Private Plan Change 21 as notified and seeks that Waikato District Council:

- reject Proposed Private Plan Change 21 in its entirety in the absence of a thorough analysis of consistency of this plan change with relevant strategic documents, demonstrating appropriate strategic fit of the proposal; or
- ensure that decisions made in relation to PPC21 provide for the integration of proposals for future development at Pokeno; in particular consideration as to whether or not the densities achieved through this plan change are appropriate given the targets provided in the Waikato Regional Policy Statement and draft Future Proof strategy.

12. Overall, the Transport Agency requests that the Council remains open to revisiting any decisions made through this process following the conclusion of the projects listed in paragraph 6 above. The Waikato District Plan review process would be an ideal vehicle to re-test the development proposed in PPC21 in light of any outcomes of these projects available at that time (or against the evidence underpinning them). This may include an opportunity to review the household densities being achieved on this site and the wider Pokeno Structure Plan area to better meet the appropriate density targets and give effect to the National Policy Statement on Urban Development Capacity and Regional Policy Statement.

The Transport Agency **does** wish to be heard in support of this submission.

The Transport Agency **does not** wish to present joint evidence.



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Signed by Jenni Fitzgerald

Under delegated authority of

The NZ Transport Agency

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Date: 13 October 2017

File No: 25 05 00G  
Document No: 11187067  
Enquiries to: Leslie Vyfhuis

13 October 2017

Waikato District Council  
Private Bag 544  
Ngaruawahia 3742

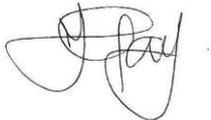
Email: [districtplan@waidc.govt.nz](mailto:districtplan@waidc.govt.nz)

**Waikato Regional Council Submission to Proposed Private Plan Change 21: Graham Block Development**

Please find attached the Waikato Regional Council's submission in regard to Proposed Private Plan Change 21, Graham Block Development, in Pokeno.

Should you have any queries regarding the content of this document please contact Leslie Vyfhuis, Team Leader Policy Implementation, directly on (07) 859 0587 or by email [Leslie.Vyfhuis@waikatoregion.govt.nz](mailto:Leslie.Vyfhuis@waikatoregion.govt.nz).

Regards

A handwritten signature in black ink, appearing to read 'Tracey May', with a small dot at the end.

**Tracey May**  
Director Science and Strategy

# Waikato Regional Council

## Submission on Proposed Private Plan Change 21: Graham Block Development

13 October 2017

### 1.0 SUBMITTER DETAILS

Submitter: Waikato Regional Council  
Contact person: Leslie Vyfhuis (Team Leader – Policy Implementation)  
Email: Leslie.Vyfhuis@waikatoregion.govt.nz  
Phone: (07) 859 0587  
Post: Private Bag 3038, Waikato Mail Centre, Hamilton 3240

I could not gain an advantage in trade competition through this submission.

I am not directly affected by an effect of the subject matter of the submission that:

- (a) does not adversely affect the environment; and
- (b) does not relate to trade competition or the effects of trade competition.

### 2.0 INTRODUCTION

- 2.1 Waikato Regional Council (WRC) appreciates the opportunity to make a submission to Proposed Private Plan Change 21 (PPPC21). WRC's primary interest is in relation to Waikato Regional Policy Statement (RPS). District Plans, including Plan Changes such as this one, are required to give effect to the RPS (RMA s75(3)(c)).
- 2.2 In this case, the key areas of interest relate to the management of the built environment (RPS Chapter 6), and the management of indigenous biodiversity values (RPS Chapter 11).

### 3.0 SUBMISSION ON PRIVATE PLAN CHANGE 21

Provision	Support/ Oppose	Submission	Decision sought from the Council
Amendment to Pokeno Structure Plan Area Map (Appendix 54.15A) to accommodate additional residential growth	Neutral	<p>Notwithstanding other matters raised in this submission, WRC acknowledges that urban development at Pokeno is anticipated in a number of documents, including the Franklin District Growth Strategy. Map 1.0 of the strategy identifies Pokeno as an 'existing urban area' and a node for 'new urban housing'. RPS Policy 6.12 is about implementing the Franklin District Growth Strategy.</p> <p>RPS Method 6.12.3 states that the Future Proof Growth Strategy is to be amended to incorporate the part of Waikato District that was the Franklin District. This process is currently underway, with Pokeno identified as a residential growth management area in the Draft Future Proof Strategy May 2017, which is currently going through a public consultation process. The draft document also identifies that Pokeno has the potential for further growth (in addition to what has already been provided for in the Pokeno Structure Plan; Pokeno Stage 1).</p>	Retain as notified (subject to any amendments sought in relation to specific submission points that follow).

<p>Managing areas of significant indigenous vegetation within the structure plan area</p>	<p>Oppose in part</p>	<p>Based on the ecological assessment, three areas have been identified as having significant biodiversity values. These are the bush block referred to as SE1, and Wetlands 1 and 2. SE1 is currently listed as item C.34 in Schedule 8A of the Franklin District Plan (Historic Buildings, Structures, Trees and Areas).</p> <p>It is proposed that Wetlands 1 and 2 will be identified on the Pokeno Structure Plan Map, however there are no corresponding changes proposed to the district plan or structure plan provisions that would provide for the management of these areas. In addition, the s32 report (page 7) states that the proposal will result in the loss of 13 per cent of the upper reaches of Wetland 1. It appears that this will be as a result of stormwater management, specifically the construction of four pre-treatment forebays (Ecological Assessment, page 51).</p> <p>The RPS contains policy for managing areas of significant biodiversity value (Policy 11.2). This policy requires the protection of these areas, and implementation method 11.2.2 sets out a framework as to how district and regional plans are to manage adverse effects on these areas, including an emphasis on avoiding adverse effects as a preference.</p> <p>Given the requirements of s76 RMA, areas of significant indigenous vegetation within urban environment allotments need to be scheduled in the plan. The Pokeno Structure Plan lists Schedule 8A as one of the methods to implement policy 54.15.2.3.</p> <p>It should also be noted that stormwater discharge consents will be required from WRC. WRC does not support online treatment devices, and these should be constructed offline rather than in the receiving environment.</p>	<p>Add Wetland 1 and 2 to Schedule 8A, or similar relief to ensure that the plan provides for the protection of these identified areas of significant indigenous vegetation and habitat.</p> <p>AND</p> <p>Amend Section 54.15.2.2 of the Pokeno Structure Plan as follows to include reference to Wetlands 1 and 2 (or like relief to provide for the management of wetlands to give effect to RPS Chapter 11):</p> <ol style="list-style-type: none"> <li>1. <i>Issues</i>  <i>... The Pokeno Structure Plan area contains some locally significance landforms, <u>wetlands</u>, vegetation and watercourses which are sensitive to development and warrant protection, conservation or a limitation on development...</i></li>   <li><i>The Pokeno Structure Plan and adopted Stormwater Catchment Management Plan for the Pokeno Structure Plan Area identifies the main perennial stems of the Tanitewhiora and Helenslee Streams in particular. <u>The Pokeno Structure Plan also identifies two significant wetlands.</u></i></li>   <li>2. <i>Objective</i>  <i>To achieve development which maintains locally significant landforms, <u>wetlands</u>, and vegetation and maintains or enhances water quality and identified watercourses <u>and wetlands.</u></i></li>   <li>3. <i>Policy</i>  <i>Subdivision and development should avoid, remedy or mitigate the effects of urban development by:</i>  <i>...</i></li> </ol>
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			<p><i>(d) protecting, maintaining and enhancing watercourses <u>and wetlands</u> identified on the Pokeno Structure Plan;</i></p> <p>4. <i>Explanation</i>  <i>...However, it contains some areas of locally significant vegetation, landforms, <del>and</del> two locally significant watercourses, <u>and two significant wetlands.</u></i></p>
Managing areas of indigenous biodiversity within the structure plan area	Oppose in part	<p>The structure plan area includes gully systems, perennial and ephemeral watercourses, as well as indigenous riparian and terrestrial vegetation that has not been identified as significant in the ecological assessment.</p> <p>The RPS contains direction on the management of indigenous biodiversity generally (including areas that have not been assessed as significant) in Policy 11.1 and associated methods. The RPS requires that district plans maintain or enhance indigenous biodiversity, including by providing for positive indigenous outcomes when managing activities including subdivision and land use change (RPS Implementation Method 11.1.1). The RPS also requires that where loss or degradation of indigenous biodiversity is authorised adverse effects are avoided, remedied or mitigated (RPS Implementation Method 11.1.3).</p> <p>Chapter 8 of the RPS also contains policy direction regarding the management of freshwater bodies. Implementation Method 8.3(e) refers to where practicable, avoiding the modification of fresh water bodies including the piping, excavation, infilling, widening or straightening of the fresh water body. Whilst these activities are controlled by Waikato Regional Council, the policy and associated method have implications in relation to the proposed structure plan layout.</p>	<p>Relief to ensure that adverse effects on areas of indigenous biodiversity within the Graham’s Block area (including gully systems, perennial and ephemeral watercourses as well as indigenous riparian and terrestrial vegetation) are avoided as a preference, and that where loss or degradation is proposed, there is a process to ensure the effects are assessed and appropriately managed.</p> <p>AND</p> <p>Amend the following explanation in 54.15.2.2.4:</p> <p><del><i>The Pokeno Structure Plan anticipates modification of ephemeral streams to allow development.</i></del></p>

		<p>With respect to the Waikato River and its catchments, the RPS also includes the Vision and Strategy for the Waikato River (RPS Part 2), which contains objectives and policies that relate to the restoration and protection of the health and wellbeing of the Waikato River. These include a recognition and avoidance of adverse cumulative effects, and a recognition that the Waikato River is degraded and should not be required to absorb further degradation as a result of human activities. These provisions are relevant for the management of the gully systems within the plan change area (which are within the Waikato River catchment).</p> <p>The ecological assessment report makes a number of recommendations regarding the management of ecological values within the structure plan area (pages 49 – 52) and these are generally supported, however no changes are proposed to the structure plan to implement these recommendations.</p> <p>The existing structure plan includes policy regarding significant vegetation, and identified watercourses (54.15.2.23(c) and (d)). The plan change does not propose any amendments to the structure plan that will provide for the management of indigenous biodiversity other than areas assessed as significant, and no additional watercourses have been identified on the structure plan map. The plan change proposes that existing text which states that modification of ephemeral streams to allow development is anticipated will be retained (section 54.15.2.2.4). This is not consistent with the Vision and Strategy for the Waikato River or the RPS.</p> <p>It should be noted that any proposals to divert or infill any wetland or ephemeral stream systems will need resource consents from Waikato Regional Council.</p>	
Whole Plan Change	Neutral	It is noted that a number of consents are likely to be required from WRC in accordance with the Waikato Regional Plan, including stormwater discharge, earthworks, diversion or infilling of wetland or stream systems, and any structures on or over the bed of any	No change.

		stream or wetland area. It is anticipated that all wastewater will be tied into the municipal system and will not require separate WRC consents.	
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### **3.0 FURTHER INFORMATION AND HEARINGS**

3.2 WRC **wishes to be heard** at the hearings for Plan Change 21 in support of this submission and is prepared to consider a joint submission with others making a similar submission.

3.3 WRC **could not** gain an advantage in trade competition through this submission.