

IN THE MATTER of the Resource Management Act 1991
("RMA" or "the Act")

AND

IN THE MATTER of a submission pursuant to Clause 6 of
Schedule 1 of the Act in respect of the
**PROPOSED WAIKATO DISTRICT
PLAN** by Pokeno Village Holdings
Limited (submitter no. 368 / further
submitter no. 1281)

SUMMARY STATEMENT OF EVIDENCE OF CHRISTOPHER JAMES SCRAFTON

Introduction

1. My name is Christopher James Scrafton. I am a Technical Director – Planning in the consultancy firm of Beca. I prepared a statement of evidence dated 10 March 2021 and a statement of rebuttal evidence dated 3 May 2021. The purpose of this document is to summarise those statements.
2. I outlined my qualifications, experience and commitment to comply with the Environment Court Expert Witness Code of Conduct in my primary statement of evidence.

The application of structure planning to guide urban growth

3. I largely agree with the recommended Future Urban Zone (FUZ) provisions outlined in Section 145 of the Future Urban Zone and Medium Density Housing Section 42A Report (FUZ and MDZ S42A Report) and I consider that the application of the FUZ should be intrinsically linked to the anticipated long-term development capacity for Pokeno.
4. In my view, the use of the FUZ and the requirement of a structure planning process for the urbanisation of the FUZ is appropriate practice in terms of achieving well-functioning urban environments. I consider that the use of a FUZ and the requirement for structure planning to be effective planning mechanisms that can assist the Waikato District Council in meeting its requirements under the NPS:UD and the RPS. With regard to the RPS I note that Policy 6.1 of the RPS directs (amongst other things) development of the built environment to occur in a planned and co-ordinated manner and to have regard to the development principles set out at Section 6A of the RPS. To implement Policy 6.1:
 - (a) Implementation method 6.1.1 confirms that local authorities shall have regard to the development principles in Section 6A when preparing, reviewing or changing district plans;

- (b) Implementation method 6.1.7 encourages territorial authorities to ensure that, prior to providing new urban zoning, urban development planning mechanisms such as structure plans and town plans are produced to allow for proactive decisions about future urban development and allow for the information in Implementation method 6.1.8. to be considered.
 - (c) Implementation method 6.1.8 sets out the information requirements that are required to support new urban zoning including:
 - (i) How stormwater is to be managed having regard to a total catchment management approach and low impact design methods¹.
 - (ii) Identification of the location, type, scale, funding and staging of infrastructure required to service the area².
5. I consider that, a risk of not applying holistic planning approaches to the development of Pokeno is a resultant imbalance of land use and subsequently not achieving well-functioning urban environments. In this regard, I note that Mr Mead states that land for employment activities (business and industrial) are not proposed within the PWDP³. While I note that some additional employment land is now recommended to be rezoned, there is no clear evidence that provides an analysis for how much employment land (or other landuses other than residential) should be provided to sustain a community of the anticipated scale.

Deferring assessments of effects

6. In my primary statement of evidence, I outline the importance of considering zoning submissions at a more holistic scale⁴ to support the achievement of well-functioning urban environments. While I agree with Mr Mead that stormwater and transport planning can (to some degree) be undertaken at an individual development scale, I consider that:
- (a) Deferring consideration of issues to resource consent processes:
 - (i) Cannot provide for wider spatial planning considerations such as the balance of land uses and their contribution to well-functioning urban environments; or
 - (ii) Provide sufficient certainty that the cumulative issues associated with infrastructure capacity and provision can be adequately considered;

¹ Implementation Method 6.1.8(g), RPS

² Implementation Method 6.1.8(b), RPS

³ Paragraph 36, Section 42A Report: Pokeno

⁴ Paragraph 4.20, Primary Statement of Evidence of Christopher James Scafton

- (b) No evidence of broader scale transport or catchment planning assessment has been provided through this plan review process and therefore there are no opportunities for this information to inform future subdivision and resource consent processes.
 - (c) This approach does not allow for the possibility that it may not be possible to provide some infrastructure components or they are economically prohibitive to provide.
 - (d) There are no requirements in the proposed provisions for catchment planning to be undertaken, and therefore there will be no future opportunities for this information to inform subdivision and consent processes.
7. Whilst I consider the subdivision process adequately provides for assessment of effects at the development level, overall, I am of the view that the proposed subdivision and development process (including the activity status, objective and policy framework and matters of discretion) does not adequately provide for broader spatial planning issues that would be considered at the structure planning stage and that such consideration has to date been absent from this plan review process. While the matters described above enable a broad range of effects to be considered, these typically relate to the development area itself (i.e. the site) or its immediate periphery (i.e. interface treatments and immediately adjoining connections).
8. In my primary statement of evidence⁵ I outline that the Pokeno Structure Plan enabled guidance for the integration of growth and infrastructure provisions which, in turn, provided guidance for the development of Pokeno.
9. I agree with Mr Mead that, where an appropriate structure plan has been prepared for a development area, then there would be benefits from incorporating the plan into the PWDP6. Despite the acknowledgement of its benefits, Mr Mead does not make recommendations in relation to how this can be achieved in practice through the PWDP provisions. As a result, I am of the view that these potential benefits will not get realised as there is no recognition of the structure plan in the proposed provisions.

Christopher James Scafton

12 May 2021

⁵ Paragraph 5.26, Primary Statement of Evidence of Christopher James Scafton

⁶ Paragraph 112, Section 42A Report: Pokeno