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Would you like to present your submission in person at a hearing?



Yes



I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Additional requirements for hearing: May consider presenting jointly with others with similar submission points.

Attached Documents

File
WRC Submission to Proposed Waikato District Plan
Proposed District Plan Notified July 2018

File No: 25 05 00G
Document No: 12999863
Enquiries to: Andrew Tester

27 September 2018

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Dear Sir/Madam

Waikato Regional Council Submission to the Proposed Waikato District Plan

Thank you for the opportunity to submit on the Proposed Waikato District Plan. Please find attached Waikato Regional Council's (the council's) submission regarding the plan. The submission was formally endorsed by the council's Strategy and Policy Committee on 18 September 2018.

Should you have any queries regarding the content of this document please contact Andrew Tester, Senior Policy Advisor, directly on (07) 858 4661 or by email andrew.test@waikatoregion.govt.nz.

Regards

A handwritten signature in black ink, appearing to read "Tracey May". The signature is stylized with loops and a long horizontal stroke at the end.

Tracey May
Director Science and Strategy

Submission from Waikato Regional Council on the Proposed Waikato District Plan

1.0 SUBMITTER DETAILS

Waikato Regional Council

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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 FURTHER INFORMATION AND HEARINGS

- 2.1 WRC **wishes to be heard** at the hearings for the Proposed Waikato District Plan in support of this submission and is prepared to consider a joint submission with others making a similar submission.
- 2.2 WRC **could not** gain an advantage in trade competition through this submission.

3.0 INTRODUCTION

- 3.1 Waikato Regional Council (WRC) appreciates the opportunity to make a submission to the Proposed Waikato District Plan, and appreciates the effort put in to merge the Waikato and Franklin District components into a single, cohesive resource management document.
- 3.2 WRC recognises that this proposed district plan has been notified at a time of great change for Waikato District. Not only is there considerable growth pressure, but at a sub-regional level there are strategic planning exercises that impact on the district plan – notably the review of the Future Proof Strategy and the preparation of the Hamilton to Auckland Corridor Plan - that have not yet been finalised.
- 3.3 WRC's primary interest is in relation to the Waikato Regional Policy Statement (WRPS). District Plans are required to give effect to the RPS (RMA s75(3)(c)).
- 3.4 In this case, the key areas of interest relate to co-ordinating growth and infrastructure, the location and character of development, rural subdivision and high class soils, and various matters pertaining to the natural environment. Table 1 (District-wide considerations) and Table 2 (Additional submission points by chapter) provide submission points related to the WRPS.
- 3.5 WRC is also a landowner and manager of flood protection and drainage assets in Waikato District. Table 3 includes submission points specific to the management and operation of flood protection and drainage scheme infrastructure managed by WRC.
- 3.6 The Proposed Waikato District Plan is supported in principle, subject to the amendments set out in the table below.

4.0 SUBMISSION ON PROPOSED WAIKATO DISTRICT PLAN

The following three tables combined form WRC's submission to the Proposed Waikato District Plan:

- Table 1: Submission points that apply across zones and themes District-wide
- Table 2: Chapter and provision specific submission points
- Table 3: Submission points regarding WRC as a landowner and asset manager.

Table 1: Plan-wide Provisions

Provision	Support/Oppose	Submission	Relief Sought
<i>General</i>			
Strategic objectives and policies (Chapter 1, including section 1.12 and also strategic objectives and policies across the Proposed Plan)	Clarify	<p>Several, but not all chapters in the Proposed Plan include strategic objectives and policies, and the relationship between these and non-strategic objectives and policies, and the resource management issues identified in Chapter 1, is not clear.</p> <p>Policy 4.1 of the WRPS seeks that an integrated approach to resource management be adopted, including 4.1(h) establishing a planning framework which sets clear limits and thresholds for resource use. Clearly identifying the strategic objectives and policies for all the resources that the Proposed Plan seeks to manage and cross-referencing them to related issues in Chapter 1 would promote an integrated approach and provide clarity about the relationship between issues, strategic and other objectives, policies and methods for plan users, particularly those applying for and processing resource consent applications and plan changes.</p>	CLARIFY the strategic objectives and policies in each policy chapter, and how they relate to the issues identified in Chapter 1. This could potentially be done by specifically referencing the strategic objectives and policies at the start of each policy chapter, or by pulling them out into a stand-alone strategic direction.
Zone descriptions (multiple zones) Note also Objective 4.2.1 and Policy 4.2.2	Amend	<p>Currently there are no descriptions of Zones and their intended outcomes. There is an opportunity to include these chapter by chapter to clarify the purpose of a Zone and increase understanding of the anticipated outcomes, and appropriate types of activities for the different environments.</p> <p>These descriptions will assist with understanding the purpose and character of the residential zone and the associated provisions 4.2.1 and 4.2.2.</p>	AMEND each Zone chapter to provide details on the purpose and anticipated outcomes of the corresponding zone or subzone.

<p>All zones Permitted activity earthworks E.g. including but not limited to 16.2.4.1, 20.2.5.1, 21.2.5.1, 22.2.3.1 etc.</p>	<p>Amend</p>	<p>The Te Ture Whaimana o Te Awa o Waikato, Vision and Strategy for the Waikato River contains a number of objectives regarding the restoration and protection of the Waikato River, including but not limited to a) The restoration and protection of the health and wellbeing of the Waikato River, e) The integrated, holistic and coordinated approach to management of the natural, physical, cultural and historic resources of the Waikato River, and f) The adoption of a precautionary approach towards decisions that may result in significant adverse effects on the Waikato River, and in particular those effects that threaten serious or irreversible damage to the Waikato River.</p> <p>These provisions are supported by related provisions of the Waikato Regional Policy Statement (WRPS), notably Implementation Method 8.3.10.</p> <p>The provisions as written do not take a sufficiently precautionary approach to managing sediment loadings entering stormwater networks and waterbodies, such as:</p> <ul style="list-style-type: none"> • Managing earthworks in close proximity to water bodies; • Managing earthworks in a flood plain or flood hazard area; • Managing the revegetation of earthworked sites in a timely fashion. <p>The relief sought proposes amending (or adding) the conditions to provide for a more precautionary approach that minimises the risk of sediment entering waterbodies or stormwater providing a minimum 5 metre setback and 2 month revegetation period aligning with better practice earthworks management.</p>	<p>1. AMEND Permitted Activity standards for earthworks to provide for a minimum 5 metre distance from any waterbody or overland flow path, such as: <i>"P16.2.4.1 (a)(i) Be located more than 1.5 m 5.0 m horizontally from any waterway, open drain or overland flow path."</i></p> <p>2. AMEND Permitted Activity standards to provide for a shorter period of time for earthworks to be revegetated, such as: <i>"Areas exposed by earthworks are re-vegetated to achieve 80% ground cover within 6 2 months of the commencement of the earthworks."</i></p> <p>3. ADD an additional condition related to earthworks within a flood plain (in addition to identifying these on maps), as follows (or similar): <i>"Not be located within a flood plain as identified in the Waikato District Plan."</i></p> <p>4. ADD a standard to minimise impacts on water bodies: <i>"Do not divert or change the nature of natural water flows, water bodies or established drainage paths."</i></p>
<p>All zones: Providing for low impact design approach to stormwater e.g. Policy 3.5.3, 3.5.4, 4.7.2, 8.1.2, Rule 19.1.2 RD1, 24.4.1, 24.4.2,</p>	<p>Amend</p>	<p>Sensitive environments can be adversely affected by stormwater from the subdivision and development of land. There is an opportunity to provide in the policies for low impact design, or a water sensitive design approach, especially in the coastal environment, and in the vicinity of wetlands, lakes and rivers, and their margins. This is supported by Policies 6.2 and 6.3 of the WRPS and Implementation Method 8.3.10.</p> <p>Reserves can be located to enable low impact design stormwater management.</p> <p>Rule 19.1.2 RD1 already incorporates this detail and is supported. WRC supports the application of low impact design principles as outlined in WRC's Waikato Stormwater Management Guideline. There is an</p>	<p>AMEND provisions to support the use of low impact design principles for stormwater management (in particular consider for RDA criteria and permitted activity standards).</p>

28.2.4.1 and similar		opportunity for this item to be included as a matter of discretion across all zones in the Waikato District.	
All zones: Building setbacks from waterbodies	Support amendments with	<p>There are a range of setbacks from waterbodies throughout the zones. These are supported in general, however, at a minimum all buildings should be setback a minimum of 10m from the banks of a perennial or intermittent stream, and rules should be provided and/or amended to reflect this.</p> <p>For example, there are natural gullies and existing water courses located within the Rangitahi site. A minimum setback of 10m from the bank of a perennial or intermittent stream that is provided for in other zones is supported and it is recommended that this setback is included in all zones, including this one.</p>	<p>AMEND setbacks from the banks of a perennial or intermittent stream to provide for a minimum 10m setback.</p> <p>RETAIN setbacks from waterbodies that are larger than 10m.</p>
Natural Hazards	Amend	<p>WRC acknowledges that Phase 2 of the Proposed Plan review will include amendments to the Proposed Plan to address natural hazards. WRC continues to work with WDC on this.</p> <p>The Proposed Plan provides for a range of activities and also rezones land for urban expansion around some centres. Without detail from the Natural Hazards and Climate Change Chapters it is unclear what provisions will apply to manage or restrict development and other activities on land subject to an identified natural hazards or climate change area.</p> <p>Rules and standards that may be affected include those related to earthworks, building platforms, cleanfill the construction of buildings, and rezoning of new land for urban expansion.</p> <p>Examples would include the following:</p> <ul style="list-style-type: none"> • Earthworks in a flood plain or flood hazard area are not permitted • Criteria for the assessment of earthworks in the abovementioned areas would include consideration of the flood hazard. <p>Objectives and policies throughout the document may also benefit from the consideration of natural hazards, such as Policies 5.3.5 and 6.4.7, avoiding the flood plain or flood risk areas.</p>	<p>AMEND to provide for district-wide provisions in the Natural Hazards and Climate Change Zones/overlays to restrict activities that take place in these areas, and to discourage inappropriate use and development.</p>

Plan structure – cross referencing, treatment of zone specific provisions, and guidance on how to read the Plan	Amend	<p>Currently there are not clear links and cross-references between related issues, objectives, policies and rules. There is an opportunity to provide these to make it clearer for users of the Proposed Plan to understand.</p> <p>Also, there are a number of areas that are subject to specific provisions that have been created through plan changes or other processes: e.g. Te Kauwhata Lakeside, Rangitahi Peninsula. Provisions related to these types of developments are spread across multiple chapters of the Proposed Plan. There is an opportunity to provide an easier to navigate and read suite of provisions by pulling them together into one location.</p>	<p>AMEND or format the Proposed Plan to provide for cross references between issues, objectives, policies and rules.</p> <p>AMEND by pulling area specific provisions into one Chapter (e.g. Section 9: Specific Zones).</p>
<i>Urban Growth</i>			
<p>Providing for the National Policy Statement for Urban Development Capacity</p> <p>Includes provisions such as: 1.4.4, 1.5.1-1.5.6, 1.12.1, 4.1.1, 4.1.2 and 4.6.3</p>	Amend	<p>The National Policy Statement for Urban Development Capacity (NPS-UDC) impacts multiple chapters and sections of the Proposed Plan, relating to the provision of sufficient feasible zoned and serviced housing and business land is provided for.</p> <p>Because of the proposed approach to 'live' zone new urban growth areas there are a number of areas of concern regarding this, in particular in relation to the zoning of new areas of land for urban development where it is unclear what infrastructure is available or is proposed to be provided. There is also limited direction for staging which may affect the efficient delivery of infrastructure.</p>	<p>AMEND Chapter 1 (and/or the Section 32 analysis) to show that the requirements of the 2017 National Policy Statement on Urban Capacity (NPS-UDC) have been considered, including how the district plan will seek to ensure sufficient, feasible, zoned and serviced housing and business land is provided for over the life of the plan (e.g. 1.12.1, 1.4.4, 1.5.1 to 1.5.6).</p> <p>This may include:</p> <ul style="list-style-type: none"> - identifying which of the district's towns and villages are to be the focus for urban growth and development; - indicating the extent to which each of these areas are currently serviced with necessary infrastructure; - clarifying whether structure/ master planning or other detailed investigations have been done for these areas, and if not, when this is expected to occur; - indicating which areas, towns and villages are to be given priority in terms of the timing, staging and sequencing of infrastructure to support anticipated growth and development; - addressing the issue of how areas identified for growth that currently have no supporting

			infrastructure are to be sustainably managed through the plan provisions; and - specifically referencing the NPS-UDC in Policy 4.6.3.
Application of 'live' urban residential zones to urban land where there is uncertainty about infrastructure provision. This submission point includes but is not limited to the provisions in Chapter 4, Chapter 16 Residential Zone, and Planning Maps	Oppose	<p>WRC is concerned that the provisions of Section 4.1 <i>Strategic Direction</i> do not adequately address how subdivision and development activities will be managed where a 'live' residential zoning is proposed for unserviced land within urban towns and villages. This concern also applies to other objectives and policies in Section 4 relating to residential activities and to rules contained in Section 16: <i>Residential</i>. Of particular concern are locations such as Tuakau, Pokeno and Horotiu. WRC considers that the planning framework proposed for these areas does not give effect to the WRPS' direction on ensuring an integrated, staged approach to infrastructure and development. It is likely to enable development that undermines the ability to coordinate the adequate provision of network and community infrastructure to support growth.</p> <p>WRC submits that that an alternative method to 'live' zoning of these areas should be considered, to more appropriately manage land where a live zone has been applied, but where there is no existing or planned supporting infrastructure. Without limiting the scope of any amendments, WRC suggests that options to be considered include:</p> <ul style="list-style-type: none"> - retention of the operative plan's rural zoning of these areas, with an overlay similar to the 'Hamilton Urban expansion' overlay proposed in the plan - 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 - creation of a new Urban Expansion Zone that would have its own suite of provisions for management of land use and subdivision activities. <p>(Note: WRPS Policies 6.1; 6.3; 6.14 and Section 6A.)</p>	<p>AMEND Chapter 4, Chapter 16, the Planning Maps and any other provisions that are proposed for unserviced urban residential areas where there is uncertainty about the funding, staging and timing for infrastructure provision. The amendments should establish a stronger objective, policy and rule framework than is proposed, in order to ensure that activities of an urban nature, including subdivision, is not provided for prior to structure planning processes being undertaken and without certainty about the funding, timing and staging of infrastructure provision; and</p> <p>AMEND provisions so that any subdivision, use and development in these areas does not compromise them for future development.</p>
Auckland-Hamilton Spatial Plan and Future Proof Strategy Phase 2	Amend	There is work underway producing the Auckland-Hamilton Corridor Plan, and also carrying out the Phase 2 review of the Future Proof Growth Strategy. These process will generate a vision for managing urban growth and development in significant parts of the Waikato	AMEND provisions and maps to provide for outcomes identified in the Auckland-Hamilton Corridor Plan and Future Proof Strategy Phase 2 review.

		District that may differ in some respects from that in the Proposed Plan as currently written.	
<i>Natural Environment</i>			
Environmental Protection Area	Support amendments with	It is unclear what the role and purpose of the Environmental Protection Area is. The Environmental Protection Area is mentioned in the Residential, Rural and Country Living Zones however not the objectives and policies. This is problematic as non-compliance with rules sometimes leads to a discretionary activity status and it is unclear what an activity would be assessed against.	CLARIFY the role and purpose of the Environmental Protection Area.
Areas that meet WRPS 11A significance criteria but are outside of mapped Significant Natural Areas (SNAs) in the Proposed Plan	Amend	WRC notes that not all areas of significance under section 6c of the Resource Management Act (RMA) and 11A of the WRPS will have been identified and mapped in the development of the Proposed Plan. The plan needs to provide for those areas that meet the SNA criteria, but which were not known about until an activity is proposed.	AMEND the Proposed Plan to provide a mechanism to manage areas that meet the WRPS 11A criteria and have not been identified and mapped in the Proposed Plan.
Biosecurity	Amend	There is potential for a number of activities to exacerbate the spread of pest plants and diseases, e.g. earthworks and filling. The spread of such pests and diseases poses a risk to the regional economy as well as indigenous biodiversity. While the Regional Pest Management Plan provides controls around the management of pests and diseases, it is important to recognise that activities controlled by the Proposed Plan may also have implications in terms of biosecurity.	ADD advice notes drawing attention to the provisions of the Waikato Pest Management Plan, particularly for earthworks and fill activities. ADD assessment criteria to earthwork and fill activities to allow the consideration of effects on pest and disease management.
Kauri Dieback	Amend	Kauri dieback is caused by a pathogen that is spread through soil, and is threatening kauri with functional extinction. Its spread can be facilitated by footwear, gear and machinery that is not cleaned of soil before going near kauri, and again before leaving an area with kauri. Provisions are sought to manage the effects of land use and development on the spread of kauri dieback. There is an opportunity to protect kauri. This will require changes in behaviour. WRC is party to Environment Court proceedings relating to the management of Kauri Dieback Disease in the Thames Coromandel District Plan. A decision from the Environment Court is imminent and WRC seek that, once available, the provisions also be applied to the Waikato District Proposed Plan.	ADD issues, objectives, policies and rules to address the spread of Kauri Dieback Disease.

Natural Character assessment, mapping and rules for wetlands, lakes, rivers and their margins.		<p>The RMA (section 6a) and WRPS (12.2 and 12.2.1) seek to manage natural character in the coastal environment and wetlands, lakes and rivers and their margins.</p> <p>There is policy support for this in Section 3.5 of the Proposed Plan however that does not flow through to other provisions.</p> <p>There has been no assessment of the natural character of wetlands, lakes and rivers and their margins and as a consequence natural character has not been mapped outside of the coastal environment. The Policies in section 3.5 that relate to the wetlands, lakes and rivers and their margins will only come into play for discretionary and non-complying consent applications. As a result there may be permitted, controlled and restricted discretionary activities that are inappropriate to the level of natural character.</p>	<p>UNDERTAKE a natural character assessment for wetlands, lakes, rivers and their margins.</p> <p>AMEND the provisions to ensure that natural character is managed in accordance with Policy 12.2 and Implementation Method 12.2.1 of the WRPS.</p>
Objectives, policies and rules relating to natural character	Amend	All the provisions for areas of High and Outstanding Natural Character are the same, no distinction has been made between the two areas in terms of the management approach. As a result the different levels of natural character have not been appropriately recognised and managed. This is inappropriate given that Policy 12.2 and Implementation Method 12.2.1 of the WRPS seek to recognise the different levels of natural character and therefore set out a different management approach for each.	AMEND provisions throughout the plan that relate to natural character to recognise that a different approach is required to high and outstanding natural character to give effect to Policy 12.2 and Implementation method 12.2.1 of the WRPS.
Coastal Environment Mapping and provisions	Support	<p>WRC supports the mapping of the Coastal Environment.</p> <p>WRC considers that it would be helpful to plan users if there were a section in the Proposed Plan that sets out the approach to the Coastal Environment.</p> <p>WRC also acknowledge that Phase 2 of the Plan review will address natural hazards and climate change within the coastal environment.</p>	RETAIN
Whole of Plan Significant habitats of indigenous fauna	Amend	Section 6(c) of the RMA and Chapter 11 of the WRPS both require the protection of significant habitats of indigenous fauna. Consideration needs to be given to the SNAs identified on the planning maps and whether provisions that focus on the clearance of indigenous vegetation and earthworks are enough to ensure that significant habitats are protected. For example clearance of exotic vegetation may in certain circumstances adversely affect significant habitats of indigenous fauna. (For example bats).	AMEND the Proposed Plan to take into account activities that may impact on the significant habitats of indigenous fauna that have been identified and mapped in the planning maps.

Indigenous vegetation clearance – outside a Significant Natural Area 22.2.8 23.2.9	Support amendments with	<p>WRC does not support the removal of Manuka or Kanuka from wetlands, this is potentially permitted through P1(a)(ii) and P2(a)(ii). Wetlands are underrepresented with approximately 20% of original extent remaining in the Waikato District.</p> <p>P1 and P3, Encourage dwellings, marae and papakaainga to locate outside of areas of indigenous vegetation, as is the case for SNAs.</p> <p>P3 does not provide a total cap for clearance, at which point a restricted discretionary activity will be triggered. An unlimited amount of clearance could occur under this rule with no ability to require avoid, remedy, mitigate or offset.</p> <p>WRC supports clearance beyond the permitted thresholds becoming a restricted discretionary activity.</p> <p>However, discretion should include the adverse effects on the indigenous biodiversity on the site and the extent to which these adverse effects have been avoided, remedied, mitigated or offset to allow consideration of the mitigation hierarchy in WRPS Implementation Method 11.1. 3.</p>	<p>AMEND P1(a)(ii) and P2(a)(ii) to exclude clearance in wetlands.</p> <p>ADD an additional clause to P1(a)(vii) and P3(a): <i>“There is no alternative development area on the site outside of the area of indigenous vegetation clearance.”</i></p> <p>AMEND P3 to provide a total cap on clearance, after which a consent for a restricted discretionary activity is required.</p> <p>ADD an additional assessment criteria that reads: <i>“the extent to which adverse effects have been avoided, remedied, mitigated or offset.”</i></p>
16.2.4.3 and 22.2.3.3 Earthworks – Significant Natural Areas	Support amendments with	WRC seeks clarity as to whether the earthworks rules for SNA include the clearance of vegetation as a result of earthworks or if that will be subject to Rule 16.2.8/22.2.7 respectively.	CLARIFY the application of the earthworks rule in terms of whether it includes indigenous biodiversity vegetation clearance.
Indigenous vegetation clearance inside a Significant Natural Area 16.2.8 D1, 22.2.7 D1, 23.2.8 D1, 24.2.8 D1, 28.2.8 D1	Support amendments with	WRC is supportive of indigenous vegetation clearance beyond permitted thresholds becoming a discretionary activity (D1).	RETAIN
Indigenous vegetation clearance inside a Significant Natural Area	Support amendments with	WRC support the provision for sustainable clearance of regenerating Manuka or Kanuka for domestic firewood purposes or for arts or crafts in P2. However, WRC do not support the removal of Manuka or Kanuka from wetlands or vegetation that is naturally short in stature. It is important to ensure that vegetation that is naturally short does not get included in the rules intended to provide for clearance of Manuka and	AMEND to exclude clearance of Manuka and Kanuka in wetlands and the coastal environment from this rule.

16.2.8 P2 and P6, 22.2.7 P2 and P6, 23.2.8 P2 and P6, 24.2.8 P2 and P6, 28.2.8 P2 and P6 and any other area of the Proposed Plan where similar provisions apply.		<p>Kanuka colonising pasture. Manuka, in particular, can be a permanent and important component of some types of ecosystems. These are generally wetlands, dunes and other coastal vegetation, but can be gumland vegetation that remains in the leached soils following kauri forest removal. These persistent shrublands are important habitats for lizards, orchids, mistletoes and a range of threatened species. Exclusion of permitted clearance of Manuka or Kanuka from wetlands and from the Coastal Environment is likely to prevent clearance of these ecosystems of concern. While kauri is present in the district, gumland vegetation is not thought to be an extensive ecosystem.</p> <p>The exclusion of Manuka and/or Kanuka clearance in the Coastal Environment from this rule would give effect to the 'avoid' direction in the New Zealand Coastal Policy Statement (NZCPS) and Policy 11.4 of the WRPS.</p> <p>In addition, vegetation clearance within an SNA needs to be remedied to give effect to Policy 3.2.3(a)(ii).</p> <p>Note P6 duplicates P2.</p>	<p>AMEND to ensure that weeds are controlled in the cleared area and native vegetation is allowed to regenerate.</p> <p>DELETE P6.</p>
<p>Indigenous vegetation clearance inside a Significant Natural Area</p> <p>16.2.8 P3, 22.2.7 P3, 23.2.8 P3, 24.2.8 P3, 28.2.8 P3 and any other area of the Proposed Plan where similar provisions apply.</p>	Amend	<p>P3 Provides for clearance of 250m² of indigenous vegetation removal within an SNA for building/access purposes if there is no alternative development area on the site outside the SNA. Natural values will not necessarily be evenly spread across the SNA and it is likely that some parts will be of higher natural value or of greater sensitivity than others. It is appropriate to retain discretion about the location of clearance in order to avoid as much as possible the adverse effects of the vegetation clearance. It is appropriate to require mitigation or offsetting to give effect to Policy 3.2.3(a)(iii) or (iv).</p> <p>As currently drafted this rule does not give effect to the 'avoid' direction in the NZCPS and Policy 11.4 for the coastal environment.</p>	<p>AMEND P3 by giving it restricted discretionary activity status.</p> <p>AND/ OR</p> <p>AMEND to provide tighter thresholds/ activity status in the Coastal Environment.</p>
<p>Indigenous vegetation clearance inside a Significant Natural Area</p> <p>16.2.8 P4, 22.2.7</p>	Support amendments with	<p>P4 provides for up to 1500m² of vegetation removal for marae complex, 500 m²/dwelling, 500 m²/ building, as a permitted activity. Cumulatively this could be a large loss of significant indigenous vegetation and habitat without the ability to address adverse effects through avoiding, remedying, mitigating or offsetting. It is noted that this is the same amount of clearance is provided for non-significant indigenous vegetation.</p>	<p>AMEND P4 to a restricted discretionary activity.</p> <p>AND/OR</p> <p>AMEND P4 to assign a lower threshold than clearance off indigenous vegetation outside of SNA for the same activity.</p>

<p>P4, 23.2.8</p> <p>P4, 24.2.8</p> <p>P4, 28.2.8 P4 and any other area of the Proposed Plan where similar provisions apply.</p>		<p>As currently drafted this rule does not give effect to the 'avoid' direction in the NZCPS and Policy 11.4 for the coastal environment.</p>	<p>AND/OR</p> <p>AMEND P4 to provide an overall cap on clearance as a permitted activity.</p> <p>AND/OR</p> <p>CLARIFY the location and extent of areas that might be subject to this rule in order to determine if it is likely to have a significant effect on indigenous biodiversity.</p> <p>AND/OR</p> <p>AMEND to provide tighter thresholds/ activity status in the Coastal Environment.</p>
<p>Chapter 16 and Chapter 24</p> <p>Whole Chapter-Outstanding Natural Landscapes and Features and areas of High and Outstanding Natural Character</p>	Amendments	<p>Apart from Rule 16.2.4.4/24.2.4.4 which relates to earthworks in landscape and natural character areas, it appears that no other provisions apply to buildings, structures and subdivision that fall within an overlay area.</p> <p>This does not give effect to WRPS Policy 12.1, 12.2 and associated Implementation Methods.</p>	<p>AMEND Chapter 16/24 to manage buildings, structures and subdivision within landscape and natural character overlay areas. This may be through activity status, rules and assessment criteria.</p>

Table 2: Submission Points by Proposed District Plan Chapter

Provision	Support/Oppose	Submission	Relief Sought
<i>01 Chapter 1 Introduction</i>			
All of Chapter 1	Support with Amendments	<p>WRC considers that several of the matters covered in this chapter are of such significance that there should be more emphasis placed on them, including through provision of more detailed information, and separation into standalone plan chapters.</p>	<p>AMEND Chapter 1 to include additional information for the matters it covers to be better understood and by separating its contents into discrete chapters. In particular, discussion of the district's Issues, the Strategic Direction proposed to address these, and that related to Ngaa Iwi o Tainui ki te Waikato Takiwa, Settlement Acts /Co-management/Rivers- Vision and Strategies/ Joint</p>

			Management Agreement should all be provided with separate chapters or sections.
1.12.2-1.12.8	Support amendments with	WRC supports Sections 1.12.2-1.12.7 in part, but seeks clarity about whether these provisions are to be considered as strategic objectives, or desired strategic directions/outcomes.	AMEND sections 1.12.2-1.12.8 to clarify whether these are to be considered as strategic objectives or desired outcomes. If they are to be objectives, rewrite in the style of objectives, indicate the connections to relevant policies, and consider other relief sought for a separate chapter on the Strategic Direction of the Proposed Plan, and whether these sections would sit better there.
1.4.4, 1.5.1-1.5.6	Support amendments with	<p>WRC supports the stated approach of maintaining the productive capacity of Waikato District's rural resource and ensuring that population growth and urban development results in high – amenity urban areas.</p> <p>The 'centres based' approach to retail development in Waikato District is also supported, as is accommodation of growth in a more compact urban form that is underpinned by robust master and structure planning exercises and aligned with the agreed Future Proof settlement pattern.</p> <p>These approaches assist to some extent with giving effect to the WRPS' policies in respect of a strategic, integrated approach to growth and the provision of infrastructure, but should more clearly articulate the district's responsibilities and proposed responses in respect of urban growth management (see submission point on NPS-UDC).</p>	RETAIN, subject to amendments in relation to incorporating the NPS-UDC requirements.
Chapter 1 – sections 1.5 and 1.10 – Waikato Regional Land Transport Plan	Support amendments with	<p>Section 1.5.6(a) Transport and logistics talks about the need to promote a more regional and holistic consideration of the interactions between land use and transport infrastructure. There is an opportunity to reference the RLTP, as a document that sets out the strategic framework for land transport in the Waikato Region, including funding.</p> <p>Note Section 1.5.6(c) references the Regional Land Transport Strategy. This has now been replaced under the Land Transport Management Act by the Regional Land Transport Plan.</p> <p>The Proposed Plan's statement in section 1.5.6(c) that public passenger transport will be supported by urban subdivision designs that promote efficient transport routes aligns with regional planning documents.</p> <p>Note that discussion of commuter rail services in section 1.5.6(d) only</p>	AMEND the Proposed Plan to correctly reference the Waikato Regional Land Transport Plan (particularly in sections 1.5.6(c) and 1.10.2.3), and also the development of a Hamilton to Auckland passenger rail service that will run through the Waikato District.

		<p>talks about advocacy for a passenger rail service extension between Pukekohe and Pokeno. The potential for a Hamilton to Auckland passenger rail service currently being investigated should also be acknowledged.</p> <p>Need to update reference to the recently adopted “2018 Update to the Waikato Regional Land Transport Plan 2015-2045” in the list of Waikato region strategies and plans in section 1.10.2.3. This section would also benefit from a brief blurb on the importance of the RLTP for the Waikato District, as the RLTP contains important policy on regionally significant road and rail infrastructure and the integration of land use and infrastructure.</p>	
Section B Objectives and Policies			
<i>03 Natural Environment</i>			
3.1 Indigenous Vegetation and Habitats	Support amendments with	<p>WRC is generally supportive of Section 3.1 indigenous Vegetation and Habitats. However a number of amendments are sought in order to give effect to the WRPS and NZCPS.</p> <p>No Hierarchy or offsetting for non-significant biodiversity as per 11.1/ 11.1.3 WRPS.</p>	AMEND to provide for the opportunity to offset non-significant biodiversity.
Objective 3.1.1 Biodiversity and ecosystems	Support amendments with	<p>The Proposed Plan does not clearly state that it seeks to maintain or enhance biodiversity in order to work towards achieving no net loss.</p> <p>Policy 11.1(a), Implementation Method 11.1.3 and 11.2.2 of the WRPS seek to achieve no net loss.</p>	AMEND Objective 3.1.1 to clearly state that the outcome that is being worked towards is to achieve no net loss.
3.1 Indigenous Vegetation and Habitats Mitigation hierarchy for clearance of indigenous vegetation outside of an SNA	Amend	<p>Policy 3.2.4 provides for offsetting where there are significant residual effects on indigenous biodiversity outside of an SNA. However, there is no policy that sets out a mitigation hierarchy for indigenous biodiversity outside of an SNA. It is important to link offsetting to a mitigation hierarchy to ensure that adverse effects are avoided, remedied or mitigated before offsetting significant residual adverse effects is considered.</p> <p>It is also noted, that there are provisions in section 3.2 SNAs that apply to indigenous biodiversity outside of an SNA.</p> <p>Implementation Method 11.1.3 of the WRPS provides direction in terms of biodiversity offsets for indigenous biodiversity outside of</p>	<p>AMEND 3.1 to provide a mitigation hierarchy for indigenous biodiversity outside of an SNA.</p> <p>AMEND 3.1 and 3.2 to ensure that policies related to indigenous biodiversity outside of SNA are not under section 3.2 SNAs.</p>

		SNAs. Implementation Method 11.1.3 (a)(ii) states that district plans should promote biodiversity offsets as a way to achieve no net loss of indigenous biodiversity where significant residual adverse effects are unable to be avoided, remedied or mitigated.	
3.1.2(c)	Amend	<p>The level of Manuka or Kanuka removal identified in 22.2.7 P2 and the purpose of that removal is acceptable to WRC. However, further detail needs to be added to the policy to ensure that the effects of this type of clearance remain minor.</p> <p>WRPS Implementation Method 11.1.4.</p>	<p>AMEND Policy 3.1.2(c) to read:</p> <p><i>“(c) Provide for the removal of Manuka or Kanuka for domestic firewood or arts and crafts on a sustainable basis.”</i></p>
Objective 3.2.1 Significant Natural Areas	Support	Objective 3.2.1 is supported as it gives effect to Policy 11.2 of the WRPS.	RETAIN
Policy 3.2.2 (a) Planning maps	Support	<p>WRC supports the approach of identification and mapping of SNAs. This approach provides landowners with greater certainty and assists with achieving Policy 11.2 of WRPS.</p> <p>WRC also supports the inclusion of Schedule 30.5 which contains a schedule of SNAs on urban environment allotments.</p>	RETAIN Policy 3.2.2, Schedule 30.5 and the identification of SNA's on planning maps.
3.2.3 Policy Management hierarchy	Support amendments with	<p>Policy 3.2.3 is generally supported; however, some amendments are required to ensure that the Policy gives effect to Implementation Method 11.2.2 of the WRPS.</p> <p>Policy 3.2.3(a)(i) states that significant adverse effects will be avoided unless specific activities need to be enabled. Firstly, the policy sets the bar at 'significant adverse effects' being avoided. Implementation Method 11.2.2(b) of the WRPS requires that all adverse effects are avoided.</p> <p>Secondly, no further guidance is provided on what the specific activities that need to be enabled are. This is potentially referring to those circumstances covered by Policy 3.2.1 of the Proposed Plan, however it is not clear. Implementation Method 11.1.4 of the WRPS recognises that some activities with minor adverse effects on indigenous biodiversity may be permitted.</p> <p>In addition, Policy 3.2.3(a)(iv) requires that any significant residual adverse effects be offset. WRPS Method 11.2.2(d) requires offsets</p>	<p>AMEND Policy 3.2.3 to read:</p> <p><i>“(a) Recognise and protect indigenous biodiversity within Significant Natural Areas by:</i> <i>(i) avoiding the significant adverse effects of vegetation clearance and the disturbance of habitats unless specific activities need to be enabled;</i> <i>(ii) remedying any effects that cannot be avoided; then</i> <i>(iii) mitigating any effects that cannot be remedied; and</i> <i>(iv) after remediation or mitigation has been undertaken, offset any significant residual <u>more than minor</u> adverse effects in accordance with Policy 3.2.4.”</i></p>

		where more than minor residual adverse effects remain. 'Significant' is a much higher threshold than 'more than minor' and may result in residual adverse effects not being addressed.	
Policy 3.2.4	Support with amendments	<p>As currently worded, Policy 3.2.4(a) addresses biodiversity offsets in both SNA's and indigenous biodiversity outside of SNAs. The rest of the Policy only addresses offsets in relation to SNAs. It is important that offsetting in relation to indigenous biodiversity outside of SNA's is also subject to a robust assessment framework.</p> <p>Outside of SNA's, WRPS Implementation Method 11.1.3(a)(ii) promotes biodiversity offsets where significant residual adverse effects remain. Within SNA's, WRPS Method 11.2.2(d) requires offsets where more than minor residual adverse effects remain.</p> <p>In addition, Policy 3.2.4 is intended to apply to both SNA and indigenous biodiversity outside of SNA. However it comes under section 3.2 SNAs.</p>	<p>AMEND Policy 3.2.4 to address biodiversity offsets in relation to indigenous biodiversity outside of SNA's.</p> <p>AMEND Policy 3.2.4 to require offsetting of more than minor residual adverse effects on SNA's.</p>
3.2.5 Policy – Biodiversity in the coastal environment	Support	This Policy gives effect to Policy 11.4(a) of the WRPS.	RETAIN
3.2.6 Policy – Providing for vegetation clearance	Support with amendment	<p>Policy 3.2.6 gives effect to Implementation Method 11.1.4 of the WRPS. However, for clarity and consistency with the WRPS it is suggested that the opening statement be amended to refer to minor adverse effects, as this is the basis for the activities listed in the WRPS Implementation Method.</p> <p>The activities in Policy 3.2.6 are provided for as permitted activities in the rules (just as they are for SNA, but different thresholds apply). However, this Policy falls under the heading 3.2 SNAs.</p>	<p>AMEND Policy 3.2.6 to recognise that only clearance with minor adverse effects in relation to the maintenance or protection of indigenous biodiversity will be enabled as a permitted activity.</p> <p>AMEND/ RELOCATE Policy 3.2.6 so that it is clear that it applies to both SNA's and indigenous biodiversity outside of SNAs.</p>
3.2.8 Policy - Incentivise subdivision	Support	WRC is supportive of mechanisms that incentivise the protection and enhancement of SNA's. This is consistent with Implementation Method 11.1.8 of the WRPS.	RETAIN
3.3.1 Objective – outstanding natural features	Support	Objective 3.3.1 is supported as it gives effect to Objective 3.20 and Policy 12.1 of the WRPS.	RETAIN

and landscapes and policies			
3.3 Outstanding Natural Features and Landscapes	Amend	<p>The policy framework under section 3.3 takes the same approach to Outstanding natural features and landscapes (ONFL) regardless of whether they are in the coastal environment or outside of the coastal environment. Policy 6.2(c), Implementation Method 12.1.1 (a)(i) of the WRPS and Policy 15 of the NZCPS require that the adverse effects of activities on ONFL are avoided. Policy 3.3.3 (iv) of the Proposed Plan talks about avoiding, however that is only in the context of two specific activities; extractive industries and earthworks.</p> <p>For areas outside of the coastal environment, the policy framework in section 3.3 does not reflect the mitigation hierarchy that is expressed in Implementation Method 12.1.1(a)(ii) of the WRPS. That is avoid adverse effects of activities on the values and characteristics of ONFL, and if avoidance is not possible remedy or mitigate the adverse effects.</p> <p>In addition, the policies do not specifically address cumulative adverse effects as required by Policy 12.1 of the WRPS.</p>	<p>AMEND section 3.3 to require that adverse effects of activities on the values and characteristics of ONFL are avoided in the coastal environment.</p> <p>AMEND section 3.3 to ensure that, for areas outside of the coastal environment, the hierarchy set out in Implementation Method 12.1.1(a)(ii) of the WRPS is reflected. I.e. avoid adverse effects, where avoidance is not possible remedy or mitigate.</p> <p>AMEND section 3.3 to address cumulative adverse effects.</p>
3.4 Significant amenity landscapes, Objectives, Policies, Rules and maps	Support	WRC supports the approach to significant amenity landscapes as a way to give effect to Policy 12.3 of the WRPS.	RETAIN
3.5.1 Objectives – Natural Character and policies	Support	Objective 3.5.1 is supported as it gives effect to Objective 3.22 of the WRPS.	RETAIN
<i>04 Urban Environment</i>			
Objectives 4.1.1 Strategic and 4.1.2 Urban Growth and Development	Support amendments with	<p>Objectives 4.1.1 and 4.1.2 are supported in part as they will assist to some extent with giving effect to the WRPS and the Future Proof Strategy Planning for Growth 2017's (Future Proof Strategy's) direction for Waikato District's urban environment.</p> <p>However, amendments (or additional objectives) are required to: provide more focussed, integrated strategic direction for the district's urban environments; relating to accommodating urban growth and</p>	<p>AMEND Objectives 4.1.1 and 4.1.2, or include additional Objectives, to ensure that these provisions provide a focussed, integrated strategic direction in respect of the district's urban environments.</p> <p>AMEND Objective 4.1.1 to:</p>

		<p>development in Waikato District; and give effect to the National Policy Statement on Urban Development Capacity (NPS-UDC) and the WRPS.</p> <p>The two Objectives fail to provide direction on other matters critical to ensuring thriving, sustainable urban environments, including the management of natural or ecological values in the urban environment and management of conflicts between rural and urban environments or different types of urban activities, such as those of an industrial and residential nature. WRC considers that additional strategic objectives should be included to address these matters. To meet the requirements of the NPS-UDC there should also be an objective that sets out the district's minimum targets for sufficient, feasible development capacity for housing, with associated policies. (Note: WRPS Policies 6.1, 6.3, 6.14, 6.16 and 6.17).</p>	<ul style="list-style-type: none"> - clarify whether it applies to both urban and rural communities - more explicitly refer to planned growth and development that is integrated with infrastructure provision; - specify what proportion of the additional dwellings to be created between 2018-2045 are to be provided within the 10 year timeframe for this district plan and whether they will be serviced; and - identify what portion of the additional dwellings to be provided are anticipated to be located within the district's urban environments. <p>AMEND Objective 4.1.2 <i>Urban Growth and Development</i> to:</p> <ul style="list-style-type: none"> - clarify that urban growth and development is only to occur within and around towns and villages identified in the settlement pattern set out in the Future Proof Strategy and WRPS; and - to direct that urban growth and development will only occur where there is existing or planned supporting infrastructure.
Policy 4.1.3	Support Amendments with	<p>Policy direction similar to that contained in Policy 4.1.6 in respect of the zoning and location of commercial and industrial development should be included in respect of residential development. The policy should identify the zones that provide for urban scale residential development; the specific towns and villages where it is envisaged that residential growth and development is to occur, consistent with the Future Proof Strategy, and giving effect to the WRPS; and which of these the district intends to prioritise for growth and infrastructure provision over the term of the plan.</p> <p>WRC notes that as a result of Stage 2 of the Future Proof Strategy Update, there may be changes to the current settlement pattern, and these should be reflected in the district plan provisions.</p> <p>Policy 4.1.3 also directs the location of urban development, however, does not take into account consideration of high class soils, SNAs,</p>	<p>AMEND Policy 4.1.3 or include additional policy for urban residential activities that is similar to Policy 4.1.6. The additional policy should specify:</p> <ul style="list-style-type: none"> - which of the plan's residential zones are to apply in the district's urban towns and villages; - that rural-residential subdivision and development is not to occur in urban areas; - exactly what is meant by the term 'infrastructure' as used in the policy, for example if it includes on-site waste water treatment, such as might be used in rural towns and villages; and - that urban residential development is to occur primarily in accordance with the Future Proof Strategy (and any additional locations identified

		outstanding natural features and landscapes, natural character and hazards. This policy should be expanded to take these into account, giving effect to the WRPS provisions such as Policies 14.2, 13.2, 12.1 and 6.1 among others. (Note: WRPS Policies 6.1, 6.3, 6.6, 6.14 and Section 6A).	through the Future Proof update and Auckland to Hamilton Spatial Plan currently underway) where infrastructure to support development of an urban nature is or will be available over the term of the district plan; and whether and which of these locations are identified as priority growth areas for the district. AMEND policy 4.1.3 to take into account high class soils, significant natural areas, outstanding natural features and landscapes, natural character and hazards.
Policy 4.1.4	Support amendments with	This policy is supported as it will assist with ensuring a co-ordinated approach to infrastructure provisions and integration of growth and infrastructure provision, however, it does not provide clear guidance on how infrastructure and staging of development will be integrated. (Note: WRPS Policies 6.1, 6.3, 6.14 and Section 6A).	AMEND Policy 4.1.4 – <i>Staging of development</i> to include details on how subdivision, use and development of new urban areas within urban towns and villages is to be integrated and staged in areas where a ‘live’ zoning is proposed, but where infrastructure does not currently exist or is not planned to be provided over the timeframe of the district plan.
Policy 4.1.5	Support amendments with	WRC is concerned that the proposed densities for the Residential and Village zones do not accurately reflect the Future Proof density targets and the WRPS’ Policy 6.15 <i>Density targets for the Future Proof area</i> . The WRPS targets are expressed as average gross density targets, are specific to greenfield developments for identified towns in Waikato District, and there are no specific densities provided for the district’s established urban environments. Higher minimum densities than those proposed are more appropriate for established residential areas immediately adjacent to the Business Town Centre zones. Higher residential densities around this zone would better support public transport and other infrastructure, the commercial vitality of the town centre and promote people living, working and playing in their local town centres. WRC notes that the draft <i>North Waikato Integrated Growth Management Programme</i> Business Case states that a density of approximately 17 dwellings per hectare would be required to support a commuter train service at Tuakau.	AMEND Policy 4.1.5 <i>Density</i> to indicate that in the Residential zone closest to Business Town Centre zones, it is anticipated that a higher density per hectare is to be achieved. AMEND Policy 4.1.5 <i>Density</i> to indicate a higher minimum density than is currently proposed for serviced sites within the Village zone.

		<p>WRC is also concerned that the proposed minimum density of 8-10 households per hectare for sites in the Village Zone where public reticulated services can be provided does not give effect to the WRPS' Policy 6.15, which seeks to achieve compact urban environments. The density proposed for the Village Zone is equivalent to the WRPS' direction for density in greenfield developments in Waikato's rural villages, and is an average gross density target. WRC submits that densities for these serviced sites should more resemble those in the Residential Zone. This would assist with promoting a more compact, sustainable urban form and supporting efficient infrastructure provision.</p> <p>This submission point is to be read in conjunction with relief sought regarding the amendment of provisions to support outcomes from the Hamilton to Auckland Corridor Plan, and the Future Proof Strategy Phase 2 review. (Note: WRPS Policies 6.3, 6.14, 6.15 and Section 6A).</p>	
Policy 4.1.6	Support	Policy 4.1.6 is supported, this policy will assist with giving effect to the WRPS' policy direction regarding the location of commercial and industrial activities. (Note: WRPS Policies 6.1; 6.14; 6.16; and Section 6A).	RETAIN
<p>Objective 4.1.7 – Character of towns and associated Policies 4.1.8-4.1.16</p> <p>AND</p> <p>The Provision of rules associated with specific settlements in Chapters 16 and 17</p>	Support amendments with	<p>These provisions are supported in part as they assist with giving effect to the WRPS and the Future Proof Strategy Planning for Growth 2017 (Future Proof Strategy) in respect of seeking to ensure connectivity and integration between new and existing development, and high amenity values in urban areas.</p> <p>WRC considers however that the Objective, including its title, does not align well with the content of the associated policies insofar as the policies address a broader range of matters than are included in the Objective, including subdivision, density, landscape characteristics and reverse sensitivity issues.</p> <p>WRC submits that the objective should be amended, or new objectives added, to ensure better alignment with related policies. For example, WRC suggests that the objective should address the issue of new development connecting well with the existing built environment.</p> <p>As proposed, the plan contains no zone descriptions that could assist with an understanding of the desired urban outcomes for the Residential, Village, Industrial and Business zones.</p>	<p>AMEND Objective 4.1.7, or include additional objectives to better support and align with the matters covered by the associated policies, including that the existing residential and commercial character of the district's urban environments is to be maintained and enhanced by new growth and development.</p> <p>AMEND provisions to provide more detailed guidance about the future urban outcomes (including residential, business and industrial uses) for the centres, particularly in relation to density, location of growth areas, the timing and staging of new development, and its integration with the existing towns.</p> <p>AMEND to include additional provisions, including Objectives, Policies, zone descriptions and references to the design guidelines in Appendix 3, character statements for specific</p>

		<p>In addition, there is no cross-referencing to the design guidelines in Appendix 3 which are the focus of Policies 4.1.10-4.1.18, the character statements for specific towns and villages in Appendix 10 and structure plans included in other appendices to the plan. Cross-referencing to these provisions would assist with better achieving Objective 4.1.7, and provide greater clarity and understanding about the particular character, development focus and desired outcome(s) for each of the identified towns and villages.</p> <p>In addition, the policies sitting under this Objective should be cross-referenced to Policies in Section 4.5 <i>Business and Business Town Centre Zones</i>, including Policies 4.5.14 – 4.5.19, and any other relevant sections of the plan. This would enable plan users to obtain a full understanding of the policy direction in relation to the desired settlement patterns and urban outcomes of these places, and for an integrated approach to be taken to their growth and development.</p> <p>Further, there are no rules or other methods in Chapters 16 and 17 that are clearly targeted to achieve the outcomes sought for particular towns and villages identified in Policies 4.10-4.1.18.</p> <p>Note: WRPS Policies 6.1 <i>Planned and co-ordinated subdivision, use and development</i>; 6.3 <i>Co-ordinating growth and infrastructure</i>; 6.6 <i>Significant infrastructure and energy resources</i>; 6.14 <i>Adopting Future Proof land use pattern</i>; 6.15 <i>Density targets for Future Proof area</i>; and Section 6A <i>Development principles</i>.</p>	<p>towns and villages in Appendix 10 and structure plans included in other appendices to the plan, to assist with an understanding of the particular character, development focus and desired, strategic outcome(s) for each of the identified towns and villages; and how these outcomes are to be achieved.</p> <p>AMEND to include cross-referencing to Policies in Section 4.5 <i>Business and Business Town Centre Zones</i>, including Policies 4.5.14 – 4.5.19, and any other relevant sections of the plan, to enable plan users to obtain a full understanding of the policy direction in relation to the character of these places, and for an integrated approach to be taken to their growth and development.</p> <p>AND</p> <p>AMEND rules in Chapters 16 and 17 to capture the intended location specific character and density sought.</p>
Objective 4.2.16, Policies 4.2.17, 4.2.18	Support	WRC supports this Objective and its associated Policies 4.2.17 <i>Housing types</i> and 4.2.18 <i>Multi-unit development</i> as they assist with giving effect to the WRPS' direction relating to the integration of land use with public transport: WRPS Policies 6.1; Policy 6.3 and Section 6A.	RETAIN
Objective 4.3.1 and Policy 4.3.2	Support with amendments	<p>These provisions should be amended to provide greater clarity about critical elements of the character of the Village Zone that is to be maintained, (for example, the rationale behind the desired intensity of development) and to make a stronger correlation between infrastructure provision and the outcomes sought in terms of the zone.</p> <p>WRC is concerned that in combination, the minimum density of 8-10 households per hectare for Village Zone sites proposed in Policy 4.1.5 <i>Density</i> where public reticulated services can be provided, and the requirement for a 3000m² minimum lot size (Rule 24.4.1) promote a</p>	<p>AMEND Objective 4.3.1 to include a description or explanation of the character and purpose of the Village Zone including anticipated intensity of development.</p> <p>AND</p> <p>AMEND Policy 4.3.2 to provide greater clarity about the character of the Village Zone; to make a stronger correlation between infrastructure</p>

		rural rather than an urban outcome for the Village zone. This would not achieve the sustainable, compact urban form necessary to support efficient, effective transport and other infrastructure services. WRC is also of the view that the density policy and subdivision rule promote a settlement pattern that will be difficult to change if additional, more intensive development is required to provide for future growth around the district's urban settlements.	provision and the outcomes sought in terms of the Village zone; and to remove reference to 'semi-rural character', as this is inappropriate for a zone that is to be used to manage activities in an urban environment.
Policy 4.3.3 Future development – Tuakau and Te Kowhai	Support with amendments	WRC supports this Policy in principle, but questions the extent to which it will achieve Objective 4.3.1 <i>Village Zone character</i> , to which it relates. WRC submits that the policy should be amended to provide greater clarity about the Village Zone character that is to be maintained, including anticipated density of development, and to make a stronger correlation between subdivision, infrastructure provision and the outcomes sought in terms of the Village zone. In addition changes resulting from the Auckland-Hamilton Corridor Spatial Plan and Future Proof Strategy Phase 2 Review may influence whether this zoning is appropriate in these locations (Note: WRPS Policies 6.1, 6.3 and Section 6A).	AMEND Policy 4.3.3 <i>Future development</i> – <i>Tuakau and Te Kowhai</i> to provide greater clarity about the urban outcomes sought for the Village Zone, including anticipated development density; to make a stronger correlation between infrastructure provision and the outcomes sought for the zone; and to remove reference to 'semi-rural character'..
Policy 4.3.11	Support	WRC supports this Policy, as it will assist with giving effect to the WRPS' policy direction relating to the Future Proof settlement pattern. (Note: WRPS Policies 6.1, 6.14 and Section 6A).	RETAIN
Policy 4.5.1, 4.5.2, 4.5.3 and 4.5.4	Support	These policies assist with giving effect to the WRPS' policy direction relating to the Future Proof settlement pattern and commercial development in the Future Proof area. (Note: WRPS Policies 6.1, 6.14, 6.16, Section 6A; <i>and</i> Table 6-4).	RETAIN
Policy 4.5.7	Support with amendments	WRC supports this Policy in principle, but seeks clarity that Neighbourhood Centres will be depicted on the Planning maps, and not only on master and structure plans.	AMEND maps to show identified Neighbourhood Centres within the planning maps and not only on master and structure plans.
Policy 4.5.13	Support	This policy gives effect to the WRPS' direction on encouraging walking, cycling and multi-modal transport and maximising opportunities for people to live, work and play within their local areas. (Note: WRPS Policies 6.1, 6.14, 6.16, Section and Table 6-4.)	RETAIN
Objective 4.6.1	Support	This policy will assist with maintaining the Future Proof settlement pattern and retaining industrial activities primarily within identified industrial nodes. (Note WRPS Policy 6.1.4)	RETAIN

Policy 4.6.4	Support	WRC supports this Policy as it will assist with maintaining the Future Proof settlement pattern, retaining industrial activities primarily within identified industrial nodes and managing reverse sensitivity issues. (Note WRPS Policies 6.1, 6.14 and Section 6A.)	RETAIN
Objective 4.6.6 and Policy 4.6.7	Support	WRC supports this Objective and Policy as they assist with giving effect to the WRPS direction relating to the need to have regard to reverse sensitivity effects. (Note WRPS Policy 6.1 and Section 6A)	RETAIN
Objective 4.7.1 and Policy 4.7.3	Support	These provisions will give effect to the WRPS Policies 6.1, 6.3 and Section 6A regarding a planned, co-ordinated approach to subdivision, use and development and infrastructure provision.	RETAIN
Policy 4.7.4	Support amendments with	While generally supportive of the minimum site area of 450m ² for urban residential areas across the district, note other WRC submission points seeking higher densities and a more intensive subdivision pattern (smaller lot sizes) for land in the urban Residential Zone immediately adjacent to the Business Town Centre zones. Regarding 4.7.4(b) WRC is concerned that the minimum lot sizes in the Village Zone (particularly Te Kowhai and Tuakau) appear to promote rural outcomes rather than urban outcomes, and will not achieve the sustainable, compact urban form necessary to support efficient, effective transport and infrastructure.	AMEND to support appropriate urban outcomes for the Village Zone, and provide for more intense development in locations immediately adjacent to Business Town Centre Zones.
Policies 4.7.5 to 11 and 4.7.14	Support	WRC supports these Policies as they will assist with giving effect to the WRPS' policy direction in regard to a planned, co-ordinated approach to subdivision, use and development and infrastructure provision, achieving compact urban environments, and having regard to reverse sensitivity effects.	RETAIN
4.7.13	Support amendments with	To promote consistency with the WRPS, Policy 4.7.13 (a)(i) should read 'protect' rather than promote the natural features and landscapes of Whangamarino Wetland and Lake Waikare.	AMEND Policy 4.7.13 (a)(i) to read: Promote <u>Protect</u> the natural features and landscapes of the Whangamarino Wetland and Lake Waikare;
<i>05 Rural Environment</i>			
Objective 5.1.1	Support amendments with	The Objective gives effect to WRPS Implementation Method 14.2.1 regarding high class soils and supporting productive rural activities:	AMEND wording of 5.1.1(a)(i) to incorporate peat soils, for example:

		<p>WRPS Provisions related to the Built Environment, including 6.1.5 and 6A regarding urban subdivision, use and development.</p> <p>Peat soils form a substantial component of Waikato District's soils, and are another valuable soil resource for the District. There is an opportunity to also seek peat soils to be protected for productive rural activities in this objective, giving effect to Policy 14.5 of the WRPS.</p>	<i>"high class soils <u>and peat soils</u> are protected for productive rural activities."</i>
5.2 Productive Versatility of Rural Resources	Support	WRC supports the objective and policies of this section, noting the inclusion of maintaining and enhancing high class soils, natural ecosystems, freshwater and coastal water bodies and their catchments, and protection of indigenous biodiversity.	RETAIN
Objective 5.2.1	Support with amendments	Peat soils form a substantial component of Waikato District's soils, and are another valuable soil resource for the District. There is an opportunity to also seek peat soils to be protected for productive rural activities in this objective, aligning with Policy 14.5 of the WRPS.	AMEND wording of Objective 5.2.1 to incorporate peat soils.
Objective 5.2.1 a) ii)	Addition	To ensure that biodiversity is adequately considered this should be included with this objective, giving effect to WRPS provisions Policies 11.1 and 11.2.	ADD in after natural ecosystems <i>"and biodiversity"</i> .
Policies 5.2.2 and 5.2.3	Support	This objective and associated policies are supported due to how they give effect to WRPS provisions such as 14.2 and 14.2.1. Policy 14.2 of the WRPS seeks to avoid a decline in the availability of high class soils for primary production due to inappropriate subdivision, use or development. The Proposed District Plan provisions acknowledge the impacts that land fragmentation and other use and development, can have on high class soils.	RETAIN
5.2 New Policy	Addition	<p>To give effect to WRPS Policy 14.5 there is an opportunity to create a policy around peat soils, and their inherent value and limitations. The purpose of the policy is to:</p> <ul style="list-style-type: none"> • Recognise that peat soils may limit the location of development • Recognise the productive capacity of peat soils • Encourage the sustainable management, and where possible, the enhancement of peat soils. 	ADD an additional policy to section 5.2 to recognise and provide for the key features of peat soils.
Policy 5.3.8	Support	WRPS Implementation Method 6.1.5 seeks to direct rural-residential development to areas identified in the district plan. This sits within a greater context of provisions around focusing the expansion of urban	RETAIN

		development in identified growth areas, in this case as defined through Future Proof Growth Strategy.	
<i>06 Infrastructure and Energy</i>			
Objective 6.4.1, Policies 6.4.2, 6.4.3 6.4.4 and 6.4.5	Support	These provisions are supported as they help give effect to WRPS policies 6.1, 6.3, 6.15 and Section 6A in terms of placing emphasis on planned, co-ordinated approach to subdivision and development and provision of supporting infrastructure.	RETAIN
Section 6.5 Transport	Support amendments with	<p>Whilst the transport objective and policies in section 6.5 are generally supported, it is considered the policies could be considerably strengthened to be more consistent with the Waikato Regional Land Transport Plan (RLTP). Road Controlling Authorities play an important role in implementing the policies and implementation actions of the RLTP. The District Plan would benefit from incorporating the following elements into section 6.5:</p> <ul style="list-style-type: none"> • recognising the important role strategic road and rail corridors play in the District for facilitating the movement of inter and intra-regional freight • connecting regional cycle trails • specifically providing for public transport in new growth areas of the District • supporting energy efficient transport modes by providing necessary infrastructure e.g. electric vehicle chargers. 	AMEND the objective and policies in Section 6.5 to take into account the RLTP.
6.4.7	Amend	<p>This policy currently states that:</p> <p>(a) (ii) Manages stormwater in accordance with a drainage hierarchy, with a preference for on-site treatment.</p> <p>Care is required with on-site treatment, if this means the assets would be on-lot and hence in private ownership. How will Waikato District Council ensure that the stormwater management devices are constructed as per design criteria and that they are operated and maintained into the future? At-source stormwater management in the public domain is preferred by WRC, i.e. in the roading corridor or in drainage reserves as this ensures that the assets can be operated and maintained as intended with the District Council ensuring this happens.</p> <p>Significant systems are needed to be in place within the District Council to manage the implementation and ongoing success of on-lot devices (to document on-lot device location, design criteria, operation and</p>	<p>AMEND the policy by adding the following detail:</p> <p><i>“(a)(ii) Manages stormwater in accordance with a drainage hierarchy, with a preference for at-source management.”</i></p>

		<p>maintenance requirements, certificate of fitness, issues as they arise, etc.).</p> <p>WRC's stormwater discharge resource consents are not able to cover on-lot devices.</p>	
<i>08 Reserves</i>			
8.2 Natural Values	Support	WRC supports the enhancement of the natural environment through the provision of reserves.	RETAIN
<i>09 Specific Zones</i>			
Section 9.2 (and also Chapter 27 Rules) – Te Kowhai Airpark Zone	Amend/Clarify	<p>The proposal represents a departure from the Future Proof settlement pattern that has been given legal weight through its insertion into the WRPS, and if approved, will create a precedent in terms of a departure from that pattern. Alternatives to the agreed settlement pattern can only be allowed if they are justified by a robust, comprehensive evidence base, including following the criteria for alternative land release identified in the WRPS.</p> <p>Further information is sought on the following:</p> <ul style="list-style-type: none"> • Alignment with other land use and development at Te Kowhai, including Plan Change 17, and the strategic direction for the town and the Future Proof sub-region • The timing, staging and sequencing of development. Rule 27.4.2 <i>Subdivision Allotment Size</i> provides for lot sizes between 450m² and 2500m², dependent on connection to wastewater. If on-site wastewater disposal only is provided for this becomes essentially a rural residential development, which is not appropriate at this location • Assessment regarding the likelihood of the provision of wastewater mains infrastructure, impacts of providing for non-residential activities on Te Kowhai businesses • Detail on how to improve connections between the Airpark and Te Kowhai, and better integrate the Airpark into Te Kowhai as a whole. 	<p>SEEK further assessment of Te Kowhai Airpark to enable adequate consideration of the area, including, but not limited to covering alignment with WRPS/Future Proof settlement pattern, assessment of precedent of alternative land release, availability of infrastructure, and impacts of the proposal on the Te Kowhai settlement as a whole.</p>
9.3.3.3	Amend	To give effect to WRPS Policy 8.3.10 provision should be made for the management of effects of subdivision, use and development in relation to this zone.	<p>ADD the following to policy 9.3.3.3:</p> <p>(a) <i>Stormwater management systems designed in accordance with low impact design philosophies.</i></p>

			<p><i>(b) Provide a high level of water quality treatment.</i></p> <p><i>Minimise change to the existing hydrological cycle.</i></p>
10 Hazardous Substances and Contaminated Land			
Section 10.1	Support	The objective and associated policies address issues around sensitive land uses, incompatible activities and the environment being properly separated from hazardous facilities, giving effect to WRPS Policy 14.4.	RETAIN
Objective 10.2.1(a)	Support with amendments	<p>The use of 'human health and the environment' is supported as it aligns with the National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health (NESCS) and section 31(1)(b) of the RMA.</p> <p>To enable a broader range of considerations when addressing contaminated site remediation and/or management propose amending the wording to include the word 'sustainably' to provide for, or encourage, sustainable remediation techniques and/or in-situ management.</p>	<p>AMEND wording:</p> <p><i>"The subdivision, use and development of contaminated land is <u>sustainably</u> managed to protect human health and the environment."</i></p>
Policy 10.2.2(b)	Support	The use of 'human health and the environment' is supported as it aligns with the National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health (NESCS) and section 31(1)(b) of the RMA.	RETAIN
Policy 10.2.2(d)	Support with amendments	<p>The NESCS provides a framework for the management of contaminated sites, and Implementation Method 14.4.1 of the WRPS requires that District Plans shall include provisions that support the implementation of the NESCS.</p> <p>To clarify the intent of Policy 10.2.2(d) the wording should be rewritten, with additional wording to include reference to 'preliminary site investigations' and the 'Ministry for the Environment's Contaminated Land Management Guidelines #1 and #5'.</p> <p>To align with the NESCS reference to preliminary site investigations should also be included.</p>	<p>AMEND wording of Policy 10.2.2(d) as follows:</p> <p><i>"Ensure that contaminated land management approaches associated with the use, subdivision and development of actually or potentially contaminated land include:</i></p> <p>ADD reference to 'preliminary site investigations'</p> <p>ADD an additional sub-point the requirement that any preliminary or detailed site investigation reports, remedial action plans, site validation reports and ongoing site management plans are prepared in accordance with the Ministry for the Environment's Contaminated Land Management Guidelines #1 and #5, and are provided to both</p>

			Waikato District Council and WRC for their records.
Section C Rules			
13 Definitions			
NEW – Flood Risk Area, Floodplain, Low impact design	Amend	<p>Suggest including definitions for:</p> <ul style="list-style-type: none"> • Flood risk area • Floodplain • Low impact design. <p>Adding these definitions will assist with understanding and implementation of provisions that incorporate these terms.</p>	AMEND the definitions section to include definition for Flood Risk Area, Flood plain and Low Impact Design.
Overland flow path	Amend	Current definition for overland flow path does not align with the definition in WRC's Waikato Stormwater Management Guideline.	AMEND definition to the following: <i>"Overland flowpath - route taken by stormwater runoff not captured in a reticulated or natural stormwater system."</i>
NEW – Biodiversity offset	Support	Biodiversity offsetting and its relationship to avoiding, remedying and mitigating adverse effects of an activity is poorly understood. A new definition is recommended to be added to clarify what this is, and the expectations around it.	<p>Amend Chapter 13 by adding a new definition as follows:</p> <p><i>"Biodiversity offset A measureable conservation outcome resulting from actions designed to compensate for residual, adverse biodiversity effects arising from activities after appropriate avoidance, remediation, and mitigation measures have been applied. The goal of a biodiversity offset is to achieve a no-net-loss, and preferably a net-gain, of indigenous biodiversity values."</i></p>
NEW - Catchment Management Plan	Amend	It is noted that the term Catchment Management Plan is not defined in the Proposed Plan. There is a need to ensure delineation between storm water catchment plans and WRC led CMP or Healthy Rivers Wai Ora SCP (sub catchment plans).	ADD a definition for Catchment Management Plan and ensure it there is delineation between stormwater catchment plans and WRC led CMP or Healthy Rivers Wai Ora sub catchment plans.
Cleanfill	Support amendments with	<p>The definition for cleanfill does not fully align with the latest sector guidelines from WasteMINZ 'Technical Guidelines for Disposal to Land (August 2018)'.</p> <p>Currently the definition specifically limits cleanfill to that which has no adverse effects on people or the environment. This should be removed</p>	AMEND the definition to reflect the definition in WasteMINZ 'Technical Guidelines for Disposal to Land (August 2018)'.

		from the definition, with the rule framework providing the basis for managing effects of cleanfill.	
Conservation activity	Support in part	In the Reserve Zone, Conservation activities are permitted with no activity specific conditions. The definition for conservation activity includes the establishment of walking and cycle tracks and accessory buildings. Therefore these activities would be permitted with no restrictions on the amount of clearance. WRC considers that this is inappropriate given the potential effect on indigenous biodiversity.	AMEND the definition to exclude the establishment of walkways, cycleways and accessory buildings. AND/OR AMEND Rule 25.1.2 P3 to include appropriate thresholds or activity status for the clearance of indigenous vegetation as a result of establishing walking, cycling tracks or accessory buildings.
High class soils	Support with amendments	The definition of high class soils is supported, and aligns with the definition in the WRPS. However, peat soils are excluded from this definition and there is no definition of peat soils in plan.	ADD Peat soil definition to, as per the definition in the WRPS.
Huntly South Assessment Area	Clarification	There is potential confusion in terminology: in some areas the Huntly south assessment area is referred to then the Huntly south ponding zone- are these are the same or different.	CLARIFY terminology, and apply consistently if they are the same.
14 Infrastructure and Energy			
Whole Chapter	Amend	<p>Paragraph 14.1(1) of the Infrastructure and Energy Chapter states that the provisions of that chapter apply across the district in all the zones and overlays in the district plan. It goes on to say that the zone chapters and their associated overlays, objectives, policies and rules do not apply to infrastructure and energy activities unless specially referred to within Chapter 14. Therefore, it appears that Chapter 14 is largely intended to be a standalone/ self-contained chapter.</p> <p>With the exception of Rule 14.3.1.3(3), which relates to earthworks associated with infrastructure in Landscape and Natural Character Areas, there are inconsistencies between the activity status and standards relating to ONFL, Significant Amenity Landscapes, natural character, SNA and non-SNA vegetation clearance in Chapter 14 when compared with the zone chapters. However, the effects on the resource are the same.</p> <p>For example, Rule 14.4.1.2 allows certain buildings as a permitted activity where they are in the National Grid Yard. There is no mention of situations where the National Grid Yard and overlay areas coincide. Rule 22.3.3 in Chapter 22 Rural Zone, states that any building and</p>	<p>AMEND Chapter 14 to ensure it is consistent with the approach to overlay areas in the zone chapters. For example, there should be consistency between permitted activity thresholds and activity status between Chapter 14 and the zone Chapters.</p> <p>ADD a definition for 'Identified Area' to Chapter 13 Definitions.</p>

		<p>structure within a landscape or natural character area is a discretionary activity. This leads to an inconsistent approach between the two chapters.</p> <p>Another example is that many permitted activities in Chapter 14 become restricted discretionary if standards cannot be met. Activities with similar effects tend to be discretionary in Chapter 22 Rural Zone. In addition, the matters of discretion in Chapter 14 do not always cover effects on outstanding natural features and landscapes, natural character, significant amenity landscapes or indigenous vegetation (both within and outside of SNAs).</p> <p>A third example is that vehicle access, parking and maneuvering are all permitted under 14.12.1 subject to activity specific conditions. These conditions are focused on ensuring that the access, parking and maneuvering are fit for their intended purpose and meet engineering standards. There are no standards that address adverse effects where overlays are present on the site. Rule 22.2.7 in the Rural Zone Chapter sets out restrictions for the permitted clearance of indigenous vegetation in an SNA. However, given that Chapter `14 is intended to be standalone it is unclear how the standards in Chapter 22 would apply.</p> <p>There are many more examples of inconsistencies throughout Chapter 14.</p> <p>It is also unclear what the term 'Identified Area' means. This appear throughout the chapter. Is it intended that this capture ONFL, Significant Amenity Landscapes, NC, SNA and non-SNA?</p> <p>Amendments are required to Chapter 14 to ensure that Chapter 11 and 12 of the WRPS and the NZCPS are given effect to.</p>	
14.11.1.1 P1	Support amendments with	<p>Wording is proposed to support a shift to low impact design stormwater management systems that manage stormwater at source through retention devices rather than relying on large detention devices downstream. This approach is recommended by WRC and is outlined in Council's Waikato Stormwater Management Guideline.</p> <p>It is also recommended that additional clauses are included under this permitted activity rule that address:</p> <ul style="list-style-type: none"> • Water quality treatment 	<p>AMEND Rule 14.11.1.1 P1:</p> <p>(a) (ii) A. <i>Primary systems detain / retain runoff from all impervious surfaces during a 10% Annual Exceedance Probability storm event...</i></p>

		<ul style="list-style-type: none"> Downstream erosion and scour effects Cumulative volume effects. 	
14.11.1.1 P1	Amend	A note should be provided referring to following the guidance provided in WRC's <i>Waikato Stormwater Management Guideline</i> and <i>Waikato Stormwater Runoff Modelling Guideline</i> .	AMEND to add advice notes regarding the Waikato Stormwater Management Guideline and Waikato Stormwater Runoff Modelling Guideline.
14.11.2 RD1	Support amendments with	The effects on the environment of stormwater quality and quantity are not included as a matter of discretion.	AMEND to include new point (c): <i>(c) The potential for adverse effects to the environment in terms of stormwater quantity and stormwater quality effects.</i> This change is recommended to ensure that stormwater systems are appropriately designed to address potential adverse effects to the environment.
Table 14.12.5.5	Amend	The NZ Transport Agency has developed the One Network Road Classification as a tool to categorise roads based on their use, and to subsequently fund the road infrastructure accordingly. Clarification is sought that the road hierarchy reflects the actual and future anticipated levels of movement, in alignment with the One Network Road Classification, as this will influence the availability of funding, and may affect the ability of the road network infrastructure to meet the requirements of users and the associated land uses.	AMEND the Section 32 analysis of the road hierarchy to ensure that the One Network Road Classification has been considered when forming Table 14.12.5.5.
14.12.5.10	Support	Support requirement for bicycle spaces for all activities in section 14.12.5.10 to facilitate the uptake of cycling. The Waikato Regional Land Transport Plan supports the provision for alternative modes of transport, such as cycling.	RETAIN
16 Residential Zone			
16.1.2 - P3	Support	WRC supports the rule's encouragement for location of retirement villages within 400 metres walking distance of public transport, as this assists with giving effect to the WRPS Policies 6.1 and 6.3, and Section 6A Development Principles. It also assists with giving effect to the Proposed Plan's Objective 4.2.16 <i>Housing options</i> and Policy 4.2.17 <i>Housing types</i> .	RETAIN

16.1.3 – RD 1 – A Multi-Unit development	Support amendments	with	<p>WRC supports the provision for multi-unit development in the Residential Zone, and considers that it will assist to some degree with achievement of Objective 4.2.16 <i>Housing options</i> and Policies 4.2.17 <i>Housing types</i> and 4.2.18 <i>Multi-unit development</i>.</p> <p>WRC considers however that there should be an incentive in the rule, similar to Rule 16.1.2 <i>Permitted Activities - P3</i> to encourage this type of development to locate within 400 metres walking distance of public transport. This would assist with giving effect to the WRPS' direction in Policies 6.1, 6.3 and Section 6A <i>Development Principles</i>.</p>	<p>AMEND Rule 16.1.3 – RD 1 – A <i>Multi-Unit development</i> to include a condition as follows:</p> <p><i>"The development is either serviced by or within 400m walking distance of public transport."</i></p>
16.4.1 Subdivision – General RD1	Support Amendments	with	<p>WRC is concerned that applying this minimum lot size to areas directly adjacent to the Business Town Centre zones for the towns of Huntly, Ngaruawahia, Pokeno, Raglan, Te Kauwhata and Tuakau will not enable the achievement of a range of the plan's objectives and policies for the urban environment, including those relating to housing choice; density aligned with the Future Proof Strategy; and promotion of subdivision, land use and development that encourages thriving, sustainable town centres, and integrates with and is supportive of provision of public transport and other infrastructure.</p> <p>Note: WRPS Policies 6.1 <i>Planned and co-ordinated subdivision, use and development</i>; Policy 6.3 <i>Co-ordinating growth and infrastructure</i>; Policy 6.16 <i>Commercial development in the Future Proof area</i>; and Section 6A <i>Development principles</i>.</p>	<p>AMEND Rule 16.4.1 Subdivision – General RD1 to allow for more intensive subdivision in Residential areas directly adjacent to the Business Town Centre zones at Huntly, Ngaruawahia, Pokeno, Raglan, Te Kauwhata and Tuakau.</p> <p>APPLY a new alternative residential or mixed use zone or an overlay to the residential zone, or any other method, that includes objective(s) and policy(ies) that provide for a more intensive residential pattern around the Business Town Centre zones at Huntly, Ngaruawahia, Pokeno, Raglan, Te Kauwhata and Tuakau.</p>
17 Business Zone				
<p>Rule 17.1.2 – P1 Commercial activity and P2 Commercial services</p> <p>And</p> <p>Rule 18.1.2 P1, P3, and Section 13 Definitions</p>	Support amendments	with	<p>These rules allow for Commercial activity and Commercial services as permitted activities in both the Business and Business Town Centre zones. Allowing the same activities to occur in both zones creates unnecessary and inappropriate competition between the Town Centre and Business Zones, and does not promote a supportive, complimentary role for them. This is not consistent with the policy approach set out in Section 4.5, which seeks to encourage a wide range of commercial activities in both zones, the town centres focusing on retail, administration, commercial and civic centre activities, the Business Zone discouraging small scale retail and focusing on large format retail.</p> <p>WRC seeks clarification about the rationale behind the rules, and is concerned that they do not give proper effect to the WRPS' Policy 6.16</p>	<p>AMEND the definitions of Commercial activity and Commercial services in Section 13: Definitions activities to better distinguish large format from small scale activities.</p> <p>AMEND Rule 17.1.2 Permitted Activities – P1 Commercial activity and P2 Commercial services.</p> <p>AMEND Rule 18.1.2 P1 Commercial activity and P3 Commercial services to clarify which particular activities are appropriate for each zone.</p>

		or the policy framework for these zones contained in Section 4.5: of the Proposed Plan.	
Rule 17.1.3 RD1 – A Multi-Unit development	Support amendments with	WRC supports this provision, however, seeks an incentive in the rule, similar to Rule 16.1.2 P3 to encourage this type of development to locate within 400 metres walking distance of public transport. This helps to give effects to WRPS Policies 6.1 and 6.3 and Section 6A Development Principles. Proposals that do not meet this criterion could be assessed as discretionary activities.	AMEND Rule 16.1.3 – RD 1 – A Multi-Unit development to include a condition as follows: <i>“The development is either serviced by or within 400m walking distance of public transport.”</i>
18 Business Town Centre Zone			
Rule 18.1.3 RD1 A Multi-Unit development	Support	WRC supports the provision for multi-unit development in the Business Town Centre Zone, and considers that it will assist with achieving Objective 4.2.16 and Policies 4.2.17 and 4.2.18.	RETAIN
20 Industrial Zone			
20.5	Amend	It appears there are no rules in relation to managing stormwater from development in the Nau Mai Business Park. Appropriate low impact stormwater management needs to be undertaken at the Nau Mai Business Park to ensure no adverse environmental effects from stormwater runoff.	AMEND to include rules addressing the management of stormwater in the Nau Mai Business Park.
22 Rural Zone			
22.1.2 Permitted Activities, P8 Forestry		The National Environment Standard for Plantation Forestry (NesPF) provides for afforestation as a permitted activity in certain circumstances. Regulation 14 of the NesPF sets out a number of permitted activity conditions. Regulation 14(1)(d) requires that afforestation must not occur within 10m of an SNA. There are no activity specific conditions that apply to P8 Forestry in the Proposed Plan.	AMEND 22.1.2, P8 Forestry to have an activity specific condition that states: <i>“Afforestation must not occur within 10m of a SNA.”</i>
22.1.5 Discretionary Activities, D15	Support amendments with	In the Rural Zone “Afforestation of any part of an Outstanding or Natural Character Area or High Natural Character Area” is a discretionary activity. NesPF. Regulation 12 states that afforestation must not occur within a SNA or an outstanding natural feature or landscape. Regulation 16 (1) states that afforestation is a restricted discretionary activity if regulation 12 cannot be met. Regulation 6 provides certain	AMEND 22.1.5 D15 to include afforestation of significant natural areas as a discretionary activity. AMEND to make clear that activity D15 includes Outstanding Natural Features and Outstanding Natural Landscapes.

		<p>circumstances in which a rule in a plan can be more stringent than the regulations. These include where a rule gives effect to NZCPS policies 11, 13, 15 and 22 and matters of national importance (ONFL and SNA). Given this, it is considered that a discretionary activity status is available and appropriate to ensure that the WRPS and NZCPS are given effect to. However, it is noted that the drafting of D15 should include afforestation as a discretionary activity in SNAs also. As currently drafted it could be considered a permitted activity under 22.1.2 P8.</p> <p>It is also noted that the drafting of D15 could be improved to provide certainty as to the areas that it applies to.</p>	
22.2.3.4 Earthworks – within Landscape and Natural Character Areas	Support amendments with	<p>WRC notes that the earthwork thresholds are lower for Landscape and Natural Character Areas in comparison to the rest of the Rural Zone. This is appropriate to achieve Policy 12.1, 12.2 and 12.3 of the WRPS.</p> <p>However, WRC seeks clarity on what the thresholds are for the second part of the table that runs onto page 13. It is unclear if the 50m² area and 250m³ volume applies or if the figures have been omitted.</p>	CLARIFY the earthwork thresholds (area and volume) for the landscape and natural character areas, across all zones.
22.3.1 Number of dwellings within a lot 22.3.2 Minor dwelling 22.3.3 Buildings and structures in Landscape and Natural Character Areas	Support	<p>WRC supports the provision of dwellings, buildings and structures in landscape or natural character areas as a discretionary activity. This gives effect to Policy 6.2, 12.1, 12.2, 12.3 of the WRPS.</p> <p>However, it is unclear what activity status a minor dwelling would have in an Outstanding Natural Feature, Outstanding Natural Landscape, Outstanding Natural Character Area or High Natural Character Area. Would it be captured by 22.3.2 P1 or would it be subject to 22.3.3? For consistency and to enable the effects on the Outstanding Natural Feature, Outstanding Natural Landscape, Outstanding Natural Character Area or High Natural Character Area to be assessed, discretionary activity is sought for minor dwellings in these areas.</p>	<p>RETAIN 22.3.1 and 22.3.3</p> <p>AMEND 22.3.2 to make a minor dwelling in an Outstanding Natural Feature, Outstanding Natural Landscape, Outstanding Natural Character Area or High Natural Character Area a discretionary activity.</p>
Rule 22.4.1.1	Support	The prohibited activity status for certain types of subdivision on high quality soils is supported noting WRPS Policy 14.2 and associated Implementation Method 14.2.1.	RETAIN
Rule 22.4.1.2	Support amendments with	<p>This rule acknowledges the role of high class soils, and to limit the extent of rural land fragmentation. As currently written a minimum 20ha lot size is required before subdivision can be considered.</p> <p>In 22.4.1.2 (a)(ii) a threshold set at 20 ha has the effect of increasing the area of land within the district for which subdivision may be</p>	<p>AMEND Rule 22.4.1.2(a)(ii) to increase the subdivision threshold to 40ha.</p> <p>AMEND Rule 22.4.1.2(a)(v) to clarify that a property scale/site specific Land Use Capability Assessment is required.</p>

		<p>permitted, thus increasing the potential for more fragmentation of rural land (and high class soils) than would otherwise be the case (with a 40 ha threshold). It may also lead to more diffuse rural residential development. This is inconsistent with policy 5.2.3(a) of the PROPOSED PLAN around minimising the fragmentation of productive rural land.</p> <p>In 22.4.1.2(a)(v) it is important that the Land Use Capability Assessment be prepared at a suitable scale to reflect the specific property or properties. An assessment using regionally available data will not be sufficient to assess the class of soils on a site.</p> <p>Rule 22.4.1.2(a)(v) also seeks that one lot must contain a minimum of 80% of the high class soils, while the other lot may consist of up to 20% of high class soils. Clarification is needed that the parent lot is required to have the higher percentage of high class soils. To more effectively give effect to objectives and policies regarding high class soils a higher level of high class soils should be retained in the parent lot, and a 90%/10% split should apply.</p>	AMEND Rule 22.4.1.2(a)(v) to provide for a minimum of 90% high class soils in the parent lot, and a maximum of 10% high class soils in the child lot.
22.4.1.2 RD1 and 22.4.1.5	Support amendments with	There is no assessment criteria relating to water supply, wastewater services and stormwater management. This should be included to promote the integration of infrastructure and land use and subdivision, giving effect to WRPS Policy 6.3.	AMEND the matters of discretion in 22.4.1.2 (b) and 22.4.1.5 to include the availability of water supply, wastewater services and stormwater management.
Rule 22.4.1.4	Amend	The rule as currently written could potentially provide for lots through boundary adjustment that are neither smaller rural residential sized lots, nor suitably sized to provide for productive rural activities. This is not consistent with the policy framework of either the WRPS or the objectives and policies in the Proposed Waikato District Plan.	AMEND Rule 22.4.1.4 to reduce the scope for inappropriate sized subdivision that does not provide for a suitable minimum size for productive rural activities.
Rule 22.4.1.5	Support amendments with	A threshold set at 20 ha has the effect of increasing the area of land within the district for which subdivision may be permitted, thus increasing the potential for more fragmentation of rural land (and high class soils) than would otherwise be the case (with a 40 ha threshold). It may also lead to more diffuse rural residential development. This is inconsistent with policy 5.2.3(a) of the Proposed Plan around minimising the fragmentation of productive rural land.	AMEND Rule 22.4.1.5(v) to provide for a minimum 40ha balance lot.
22.4.1.6 Conservation lot subdivision	Support	WRC is supportive of mechanisms that incentivise the protection and enhancement of SNA's. This is consistent with Implementation Method 11.1.8 of the WRPS.	RETAIN

22.4.5 Subdivision within identified areas	Support amendments with	Subdivision of land containing an SNA could be considered a restricted discretionary activity under Rule 22.4.1.2 (if the conservation lot opportunity is not taken up). However, for other overlay areas subdivision is a discretionary activity under Rule 22.4.5. In order to manage the effects of subdivision and any subsequent land use activities on SNA's it is considered that a discretionary activity status is more appropriate. This would give effect to Policy 11.1 and 11.2 and associated implementation methods in the WRPS.	AMEND 22.4.5 to make subdivision of land containing an SNA that is not a conservation lot subdivision, a discretionary activity.
22.8.3 RD2	Support amendments with	A list is provided in (a) of the matters that council will consider when considering activities against this rule. The effects of stormwater should be included as a matter of discretion to encourage an assessment of effects on the environment from stormwater infrastructure, giving effect to WRPS Policy 6.3.	ADD the following assessment criteria: <i>“(vi) Stormwater management and the mitigation of potential adverse effects.”</i>
23 Country Living Zone			
23.3.1, 23.3.2 and 23.3.3	Support	WRC supports the discretionary activity status assigned to dwellings, buildings and structures within an ONFL or natural character area. However, clarification is sought as to the activity status for a minor dwelling. WRPS 12.2 and 12.2 and associated methods.	AMEND 23.3.2 to provide for minor dwellings in a landscape or natural character area as a discretionary activity. RETAIN 23.3.1 and 23.3.3.
24 Village Zone			
Subdivision	Amend	Refer to submission point regarding the Village Zone in Chapter 4 Urban Environment.	AMEND as per submission point outlined for Chapter 4 Urban Environment.
Planning Maps			
ONFL mapping	Support	The WRPS identifies outstanding natural features and landscapes of regional significant in Section 12A. ONFL 4 Mount Karioi and ONFL 7 Mount Pirongia are within, or partly within the Waikato District. These ONFL have been identified in the PROPOSED PLAN planning maps. However the extent of the ONFL overlay for Mount Karioi is significantly less than what is identified in the WRPS, with the rest of the area identified as Significant Amenity Landscape. WRC seeks to understand further the rationale behind this approach.	RETAIN ONFLs as identified in the planning maps. CLARIFY the approach taken to the extent of the ONFL for Mount Karioi.
Natural Character- Planning maps	Support	Areas of outstanding and high natural character have been assessed and mapped in the Coastal Environment. WRC supports this as a way	RETAIN

		of achieving section 6(a) RMA, Policy 12.2 of the WRPS and Policy 13 of the NZCPS.	
Streams and their flood plains – Planning maps	Amend	Some land is zoned for urban development that has streams running across it. There is an opportunity to map streams and their flood plains (if any) to assist with locating residential development, and also managing assessment of effects. For example an individual resource consent application may propose a small amount of fill in a flood plain, which may on its own may not create more than minor effects. However, if a number of developments all undertake a small amount of fill, the cumulative effect may be more than minor.	AMEND planning maps to show streams and their flood plains
<i>Appendix 6 – Biodiversity Offsetting</i>			
Appendix 6 – Biodiversity Offsetting	Support in part	<p>WRC supports the Biodiversity Offsetting Framework outlined in Appendix 6. However, there are some amendments sought for clarification purposes.</p> <p>Appendix 6 (2) (1) is difficult to follow. A resource consent applicant is not required to propose or agree to biodiversity offset measures, but may choose to do so if they are unable to avoid, remedy or mitigate the adverse effects of the activity they propose. A biodiversity offset is not mitigation. Mitigation is action to reduce the severity of an adverse effect. A biodiversity offset, in contrast, is designed to compensate for residual adverse biodiversity effects that remain after appropriate measures to avoid, remedy or mitigate the effects have been applied.</p> <p>It is recommended to amend the detail relating to offsetting in order to give effect to Policy 11.1 of the RPS.</p>	<p>AMEND Appendix 6 (2) (1)</p> <p><i>“Restoration, enhancement and protection actions <u>offered by an applicant</u> will only be considered a biodiversity offset where they are used to offset <u>compensate for</u> the anticipated reasonably-measurable residual effects of activities <u>that are anticipated will remain after appropriate avoidance, remediation and mitigation measures</u> actions have been <u>applied</u> occurred in accordance with Policy 3.2.3.”Manuka</i></p> <p>AMEND Appendix 6 to take into account the forthcoming national guidance for local government on biodiversity offsetting, <i>Biodiversity Offsetting under the Resource Management Act; A guidance document.</i></p>

Table 3: WRC Flood Protection and Drainage Assets

Waikato Regional Council has responsibilities as an owner and operator of assets related to flood protection and drainage in Waikato District. While some WRC properties and pieces of infrastructure have designations in place that assist in the management of this nationally significant infrastructure, others do not, and are reliant on a mixture of existing resource consents and permitted activity rules to provide for the regular maintenance, renewal and operation of this infrastructure.

This infrastructure includes, must is not limited to, the following:

- Stop banks
- Spill ways
- Pumps
- Drains.

The following submission points are focused on the ability of these regionally significant assets to successfully function, while managing effects on the environment. Urban development can also increase the pressure on flood protection and drainage infrastructure, and provisions are sought to manage these effects.

Provision	Support/Oppose	Submission	Relief Sought
3.3 Outstanding Natural Features and Landscapes 3.3.2 Policy – Recognising values and qualities	Amend	Policy 3.3.2.b pertains to recognising the value and qualities of various sites. Flood infrastructure, particularly the use of Lake Waikare and Whangamarino is not included, however, plays an important role in managing flood waters in the area. While not specifically listed in this policy, Lake Waikare is listed as an outstanding natural feature, and could also be listed here.	AMEND Policy 3.3.2(b) by adding an additional bullet point recognising the flood protection and flood water attenuation properties of the features. E.g. new (vii) <i>“existing water reservoirs and dams”</i> .
General – managing effects of development and subdivision on flood protection and drainage infrastructure	Amend	There are no provisions proposed to protect the existing drainage networks from being over loaded from residential, rural residential, industrial and commercial developments that discharge additional stormwater volumes into existing WRC drainage managed catchments. An example is the Butcher road rural residential expansion without any form of suitably maintained road berm drainage disposal system. There is an opportunity to incorporate provisions that align with WRC stormwater management plan standards. For example, any subdivision or development of land in an existing WRC managed drainage catchment should be designed to avoid adverse effects on the drainage catchment, or result in no additional flows, as this can affect the cost of maintenance and operation, which are then passed onto ratepayers. Advice should be sought from WRC when any resource consent applications are made.	AMEND Chapters 6 to explicitly provide for the protection of waterways and public drainage networks. One method to achieve this may be by amending Policies 6.4.2 and 6.4.7 to specifically provide for consideration of flood protection and drainage requirements, e.g.: ADD to 6.4.2(b): <i>“Ensure Flood protection and drainage requirements are considered when proposing new infrastructure, subdivisions, or undertaking significant upgrades to existing infrastructure.”</i> And

			<p>AMEND 6.4.7(a)(iv) <i>Retains pre-development hydrological conditions as far as practicable by using alternative methods to manage the flow rate of stormwater run-off.</i></p> <p>This could also be achieved by reflecting this sentiment in the provisions for every zone. For example in the 'Hamilton Urban Expansion Area' this would be covered by the following amendments:</p> <p>ADD to 5.5.1 a bullet point saying <i>b) Protect waterways and public drainage networks within Hamilton's Urban expansion area</i></p> <p>And</p> <p>ADD to 5.5.2 a bullet point <i>b) "Manage subdivision, use and development within Hamilton Urban Expansion Area to ensure that waterways, stormwater, indigenous biodiversity, and public infrastructure is not compromised".</i></p>
General – Chapters 6 and 14 Infrastructure – Provisions related to flood protection and drainage scheme infrastructure	Oppose	<p>Given the national significance of flood and drainage scheme infrastructure (similar to the protection of national rail network, state highways etc.), relevant objectives and policies should be included to ensure its continued functioning (maintenance, repair, replacement and upgrades). This includes the related structures for examples pump sheds, transformers, etc. and the upgrades of this infrastructure as required should be included in the appropriate rules.</p> <p>Currently there is limited recognition of the nationally significant infrastructure in terms of issues, objectives and policies, and only limited activities are provided for as rules, for example the exemption of pump sheds from building setback requirements in relation to waterbodies. The permitted</p>	<p>AMEND Chapters 6 and 14 to include a policy and rule framework that will provide for the ongoing maintenance, repair, replacement and upgrade of flood and drainage scheme infrastructure.</p> <p>An alternative option may be to provide specifically for flood protection and drainage scheme infrastructure in the policies and rule frameworks for each zone, however, as the issues are common across all</p>

		<p>activity standards across all zones do not provide adequately for the ongoing maintenance, renewal and operation</p> <p>The best fit for these provisions is Chapters 6 and 14, providing a District-wide framework, similar in treatment to the national grid infrastructure. An example framework is attached as Appendix 1 to this submission and can provide a basis for discussion jointly between WDC and WRC.</p>	zones, this is not the preferred option.
Definitions			
Ancillary rural earthworks	Support in part	Earthworks associated with flood and drainage schemes is not referenced under this definition.	AMEND the definition of 'ancillary rural earthworks' to provide for flood protection and drainage schemes managed by WRC.
Infrastructure	Clarification	It is noted that flood infrastructure is not included under the definition of infrastructure. If a stand-alone approach to flood protection and drainage infrastructure is not included in Chapters 6 and 14 (refer to earlier submission point) it will be appropriate to provide for it in the definition of Infrastructure.	AMEND the definition of 'infrastructure' to include WRC flood infrastructure with associated flood management regime.
Minor infrastructure structure	Clarification	The definition of Minor Infrastructure Structure includes "water infrastructure" would this include the infrastructure associated with flood and drainage schemes?	CLARIFY the terminology
Rural ancillary earthworks	Clarification	The Plan refers to both 'Rural Ancillary Earthworks' and 'Ancillary Rural Earthworks'. Clarification is sought that these refer to the same activity, and consistency is sought in the terminology.	CLARIFY the terminology, and amend to be consistent.

Attachment One:

Example draft planning framework for WRC assets

Issue:

1. **WRC infrastructure** is important for community wellbeing and provides significant health, safety, social and economic benefits to the community and therefore needs to be appropriately provided for
2. Difficulty with maintaining and undertaking routine works for **WRC infrastructure**
3. Incompatible activities and infrastructure impacting on the effectiveness and integrity of **WRC infrastructure**.

Objectives:

1. To recognise the importance to the economic and social wellbeing of the district and the essential nature of **WRC infrastructure** and to provide for their development, operation and maintenance.
2. To ensure that **WRC infrastructure** is provided in a manner that:
 - does not adversely affect the health and safety of the people of the district
 - avoids, remedies or mitigates any adverse effects on the natural and physical resources
 - is sensitive to the amenity values of the district, and relevant cultural or spiritual values
 - is efficient.

Policies:

1. The continuing operation of existing **WRC infrastructure** shall be protected from the adverse effects of other activities. In particular consideration shall be given to:
 - a) Maintaining and enhancing the operational efficiency, effectiveness, viability and safety of **WRC infrastructure**
 - b) Protecting investment in existing **WRC infrastructure**
 - c) Retaining the ability to maintain and upgrade **WRC infrastructure**.
3. To ensure that new **WRC infrastructure** is considered having regard to:
 - a) The environment as it exists
 - b) The duration, timing and frequency of the adverse effect
 - c) The impact on other existing **WRC infrastructure** if the new work is not undertaken
 - d) The need for the work in the context of the wider network or in the context of the provision of alternative infrastructure
 - e) The avoidance, remediation or mitigation of anticipated adverse environmental effects to the extent practicable
 - f) The demand for and benefits of new **WRC infrastructure**
 - g) The route, site, and method selection process
 - h) The technical and locational constraints
 - i) The benefits of the **WRC infrastructure** in terms of managing climate change effects.
4. Provision of new **WRC infrastructure** occurs in a planned and coordinated manner which recognises and addresses potential cumulative effects and is based on sufficient information to allow assessment of the potential long-term effects on the environment.

1. District-wide Rules:

1.1 Permitted activities

The following provisions apply to activities in the following areas, as shown on the Planning Maps:

- Within 20m of the landward toe of a stopbank (See diagram 1.1 below)
- On a stopbank
- Within the flood channel (between a stopbank and river bank)
- Within a 20m radius of a pump station or floodgate.

The following shall be permitted activities:

- (a) The construction of new **WRC infrastructure** undertaken by or on behalf of the WRC
- (b) Flood control, renewal, maintenance, unscheduled, and storm response works undertaken by or on behalf of the WRC
- (b) The maintenance of existing stock-proof fences

- (c) Grazing of animals
- (d) Any farming activity other than the grazing of animals, with written approval from WRC
- (e) The planting of trees with written approval from WRC
- (f) The construction of any road or race for the passage of stock or vehicles with written approval from WRC
- (g) The erection of any new fence, shelter, building or structure with written approval from WRC
- (h) The excavation or the digging of any drain with written approval from WRC
- (i) A network utility or private infrastructure including underground pipes and cables with written approval from WRC.

1.2 Restricted-discretionary activities

- a) New capital works relating to **WRC infrastructure**, including but not limited to flood control dams, flood gates, stopbanks, channels, and culverting of waterways.
 - i. Council has restricted its discretion to the following matters, and may impose conditions relating to these matters if consent is granted:
 - 2. The extent to which adverse effects are avoided, remedied or mitigated.
- b) Any other activity that is not permitted shall be a restricted-discretionary activity.
 - i. Council has restricted its discretion to the following matters, and may impose conditions relating to these matters if consent is granted:
 - 1. The extent to which the activity will affect the integrity of the flood control asset
 - 2. The extent to which the activity will impede maintenance access
 - 3. Methods to avoid, remedy, or mitigate adverse effects on the integrity of the flood control assets
 - 4. Methods to avoid, remedy, or mitigate adverse effects on maintenance access.

(iv) Non-notification

Applications utilising Rule 1.2 (b) that do not simultaneously trigger other consent requirements shall not be publicly notified and shall not be served on any party other than Council and WRC.

Advice Note: "Emergency Works" undertaken in accordance with Section 330 of the Resource Management Act 1991 in response to a sudden event causing or likely to cause loss of life, injury, or serious damage to property are a permitted activity.

Maps (See Matamata Piako Plan Change 44 Maps for an example)

Definition:

WRC infrastructure assets

Means infrastructure administered by Waikato Regional Council for the purpose of flood protection, land drainage or erosion control and protection.

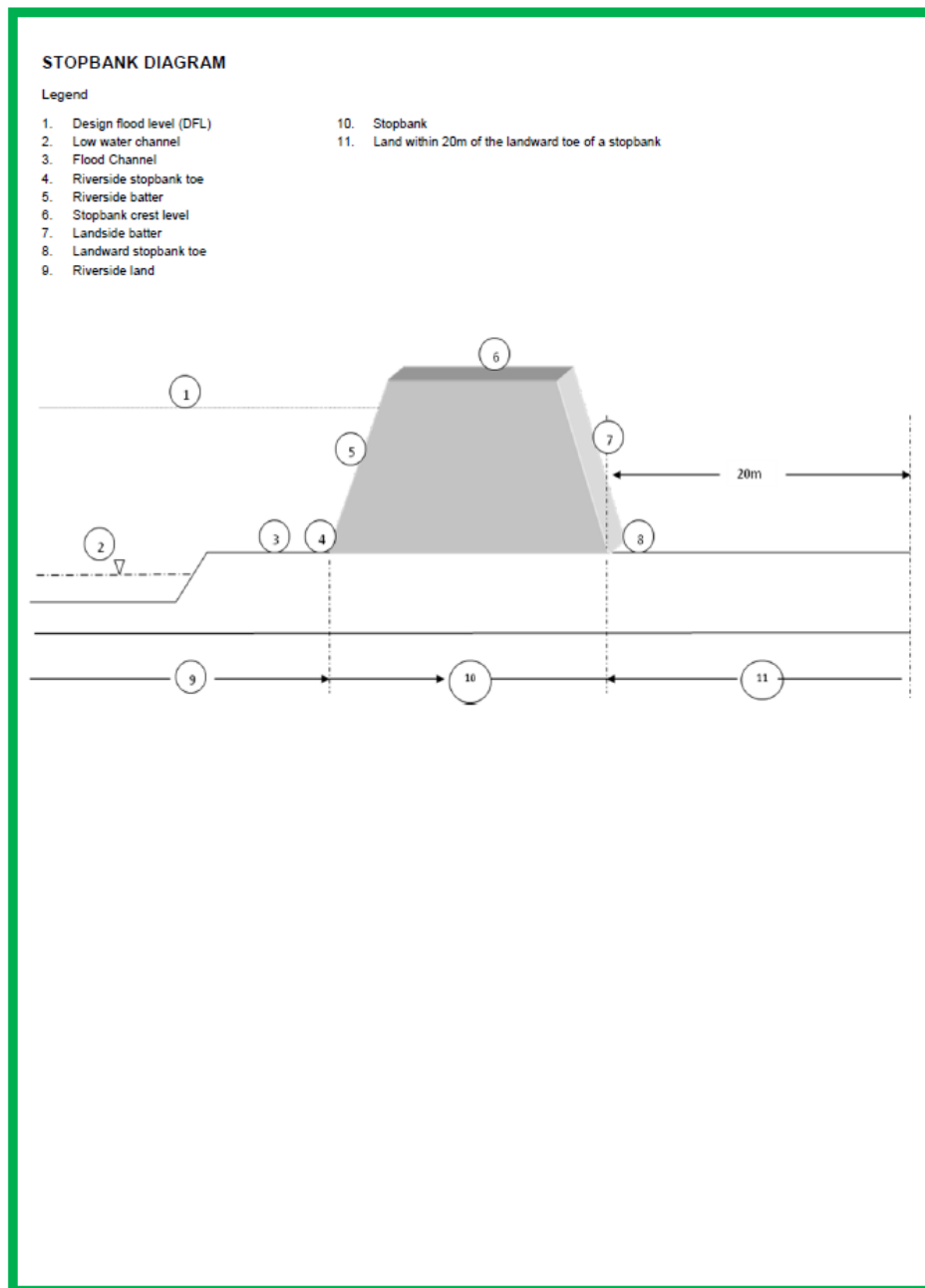


Diagram 1.1