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18 July 2024

Waipā District Council
Private Bag 2402
Te Awamutu 3840
Attn: Proposed Plan Change 14 Submission

Email: districtplan@waipadc.govt.nz

Dear Sir/Madam

Waikato Regional Council Submission to Proposed Plan Change 14 - Rezoning Part of C10 Growth Cell to the Waipā District Plan

Thank you for the opportunity to make a submission on the Proposed Plan Change 14 - Rezoning Part of C10 Growth Cell to the Waipā District Plan. Please find attached the Waikato Regional Council's submission regarding this document. This submission was formally endorsed under delegated authority on 18 July 2024. Waikato Regional Council looks forward to being involved in further discussion on this subject.

Should you have any queries regarding the content of this document please contact Katrina Andrews, Senior Policy Advisor, Strategic and Spatial Planning directly on [REDACTED] or by email [REDACTED]

Regards,

A handwritten signature in black ink, appearing to read "Tracey May".

Tracey May
Director Science, Policy and Information

Submission from Waikato Regional Council staff to Proposed Plan Change 14 - Rezoning Part of C10 Growth Cell to the Waipā District Plan

18 July 2024

Introduction

1. Waikato Regional Council (WRC) appreciates the opportunity to make a submission to Proposed Plan Change 14 - Rezoning Part of C10 Growth Cell to the Waipā District Plan (PC14). WRC's primary interest is in relation to the Waikato Regional Policy Statement (WRPS). District plans, including plan changes such as this one, are required to give effect to the RPS (RMA s75(3)(c)). Territorial authorities must also have regard to Proposed WRPS Change 1 (National Policy Statement on Urban Development and Future Proof Strategy Update) (WRPS Change 1) – Decisions version under s74(2)(a)(i) of the RMA.
2. The key areas of interest for PC14 relate to the WRPS and Proposed WRPS Change 1, the Future Proof land use pattern, high class soils/highly productive land, long-tailed bats and their habitat, stormwater management, flood hazards and transport.
3. WRC acknowledges that PC14 relates wholly to land within the C10 Growth Cell, which is identified for future urban development post-2035 in the WRPS and Waipā District Plan. The plan change proposes to bring forward the planned timing of development of this area.
4. We commend the efforts of Fonterra and Waipā District Council in providing a suite of technical documents to support PC14 and integrating the recommendations into the plan change proposal.
5. We support development of the PC14 site, as per the Future Proof Strategy 2024, subject to further clarification and analysis. Our submission predominantly focuses on the assessments and technical reports for PC14, with a view to ensuring the proposed plan change is supported by sufficient assessment and evidence to demonstrate that it gives effect to the relevant higher-order policy documents under the RMA, including the WRPS; particularly the provisions of the Urban form and development (UFD) chapter.
6. The submission also seeks to ensure a strategic and integrated approach is taken to the zoning of land for urban development, in accordance with the WRPS and the Future Proof Strategy 2024.
7. Our submission makes recommendations for further assessments and amendments to the proposed provisions to better give effect to the WRPS and other relevant higher-order policy documents.
8. We provide some general comments in relation to transport below, followed by a table of specific submission points.

General comments – Transport

9. PC14 is generally consistent with regional priorities, objectives and policies articulated in the operative Waikato Regional Land Transport Plan (RLTP), and the WRPS as it pertains to transport matters. However, we consider there are further opportunities to increase the level of integrated land use and transport planning in the plan change.
10. The proposed plan change provides an assessment against the existing Waipā District Plan and demonstrates how the proposal meets the transport requirements of that plan. However, the application does not appear to be assessed against the transport provisions of the WRPS – especially in terms of urban form and development.
11. Objective UFD-O1 and Policy UFD-P1 in the WRPS refer specifically to transport and require regard to be had to the General Development Principles in APP11. These include:
 - i. promote compact urban form, design and location to:
 - i. minimise energy and carbon use;
 - ii. minimise the need for private motor vehicle use;
 - iii. maximise opportunities to support and take advantage of public transport in particular by encouraging employment activities in locations that are or can in the future be served efficiently by public transport;
 - iv. encourage walking, cycling and multi-modal transport connections; and
 - v. maximise opportunities for people to live, work and play within their local area;
12. The plan change application relies on the Integrated Transportation Assessment to determine the transport effects of the proposed industrial rezoning and how they might be mitigated. We consider there is scope to strengthen provisions in the plan change to give greater effect to the principles in APP11 and other provisions of the WRPS.
13. We note that we have made no comment on technical specifications for road corridors and the transport network in general, but support these where they meet best practice standards for walking and cycling infrastructure.

Table of specific submission points: WRC submission to Proposed Plan Change 14 - Rezoning Part of C10 Growth Cell to the Waipā District Plan

Submission point	Provision	Support/ oppose	Submission	Relief sought
Statutory assessments				
14.	Plan change application – Section 7.4	Oppose	<p>As identified in the plan change request, the objective of the National Policy Statement for Highly Productive Land 2022 (NPS-HPL) is that “highly productive land is protected for use in land-based primary production, both now and for future generations”. WRC is currently preparing Draft Change 2 to the WRPS to give effect to the NPS-HPL.</p> <p>PC14 is required give effect to the NPS-HPL under RMA section 75(3)(a).</p> <p>The plan change application identifies that the site comprises Land Use Capability (LUC) Class 1 soils and is currently zoned Rural under the Waipā District Plan. However, Section 7.4 of the application states that <i>“The land the subject of Plan Change 14 forms part of the C10 Industrial Growth Cell in the Waipā District Plan which is programmed for urban development from 2035 onwards. By the time Plan Change 14 is likely to be operative (i.e. next year / 2025), it will fall within the period of the “next 10 years” when assessed against the 2035 timeframe in the Waipa District Plan for the C10 Industrial Growth Cell. In this context, the NPS-HPL would not apply to the Plan Change 14 land.”</i> This assessment is similarly presented in Section 8.1 of the Economic Assessment (Appendix I to the plan change application).</p> <p>We disagree with this assessment. Clause 3.5(7) of the NPS-HPL states that <i>“Until a regional policy statement containing maps of highly productive land in the region is operative, each relevant territorial authority and consent authority must apply this National Policy Statement as if references to highly productive land were references to land that, at the commencement date...”</i>. At the commencement date of the NPS-HPL, the land subject to PC14 did not meet either of the exemptions under Clause 3.5(7)(b). Therefore, the site meets the transitional definition of highly productive land under Clause 3.5(7) and the NPS-HPL applies to the proposed plan change.</p>	Ensure PC14 is adequately assessed against the NPS-HPL, due to the plan change site meeting the transitional definition for highly productive land under Clause 3.5(7).

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			<p>We acknowledge that the plan change application does, for completeness, include an assessment of the NPS-HPL. However, we consider the application does not currently provide sufficient evidence to demonstrate that the proposed plan change gives effect to Clause 3.6 of the NPS-HPL relating to urban rezoning.</p> <p>The following two submission points highlight particular areas where we consider further assessment to be required, in relation to Clauses 3.6(1)(a) and 3.6(5).</p>	
15.	Economic Assessment and plan change application (Section 7.4)	Further assessment required	<p>In regard to NPS-HPL Clause 3.6(1)(a), Section 8.3 of the Economic Assessment states that <i>“As shown earlier, with industrial growth in Cambridge tracking at twice the anticipated BCDA rate, if this is maintained then the estimated industrial land provision provided for within this area is likely to be consumed by 2035”</i> (emphasis added). We do not consider sufficient evidence is currently provided in relation to this statement.</p> <p>We also note that there appears to be some inconsistency in the timeframes within which the Economic Assessment concludes there will be a shortfall in industrial land capacity. For example, the Executive Summary refers to a potential shortfall over the medium and long term, whereas Section 7 refers to an <i>“imminent shortage of industrial land capacity in the short-medium term”</i>.</p> <p>In order to demonstrate that the proposed plan change gives effect to Clause 3.6(1)(a), we consider the economic assessment should clearly quantify the expected shortfall in industrial land capacity and the timeframe for this shortfall. This is also required in order to complete an assessment against Method UFD-M49 and APP13 Criteria A of Proposed WRPS Change 1 – Decisions version.</p> <p>This assessment should take into account any recent rezoning which provides for industrial activities, such as Plan Changes 17 and 20 to the Waipā District Plan.</p>	Provide a more robust assessment to demonstrate that the proposed plan change gives effect to Clause 3.6(1)(a) of the NPS-HPL.

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16.	Economic Assessment and plan change application (Section 7.4)	Further assessment required	<p>Clause 3.6(5) of the NPS-HPL requires that territorial authorities “must take measures to ensure that the spatial extent of any urban zone covering highly productive land is the minimum necessary to provide the required development capacity while achieving a well-functioning urban environment”.</p> <p>We consider the assessment in Section 8.5 of the Economic Assessment that “[t]he entirety of the PPC site has been identified suitable for future industrial development” is not sufficient to demonstrate that the proposed plan change gives effect to this clause.</p>	Provide a more robust assessment to demonstrate that the proposed plan change gives effect to Clause 3.6(5) of the NPS-HPL.
17.	Plan change application – Section 7.9	Further assessment required	<p>Section 7.9 of the plan change application provides an assessment against the WRPS and Proposed WRPS Change 1 – Decisions version.</p> <p>This section includes an assessment against relevant provisions of the Integrated management (IM) and Urban form and development (UFD) chapters. However, we note there are other provisions of the WRPS and Proposed WRPS Change 1 – Decisions version that are also relevant to PC14, which have not been assessed in the plan change application. We particularly recommend that the following provisions be assessed:</p> <ul style="list-style-type: none"> • The relevant objectives, polices and methods of the Land and freshwater (LF) chapter, particularly given that the Mangaone Stream flows through the plan change site. • The relevant objectives, polices and methods of the Ecosystems and indigenous biodiversity (ECO) chapter. <ul style="list-style-type: none"> ○ We note that the Ecological Assessment identifies that the plan change site contains long-tailed bat habitat and includes areas of significant indigenous vegetation along the Mangaone Stream. ○ Objective ECO-O1, Policies ECO-P1 and ECO-P2 and Methods ECO-M1, ECO-M2, ECO-M3, ECO-M13 and ECO-M14 are therefore particularly relevant to the proposed plan change. • Policies UFD-P1, UFD-P2, UFD-P11 and UFD-P13. • Methods UFD-M1, UFD-M7, UFD-M8 and UFD-M11. 	Ensure the proposed plan change is assessed against all relevant objectives, policies and methods of the WRPS and Proposed WRPS Change 1 – Decisions version.

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Economic assessment				
18.	Economic Assessment (Appendix I to the plan change application)	Further assessment required	<p>The proposed plan change is supported by an Economic Assessment prepared by Property Economics. This report addresses the appropriateness of PC14 from an economic perspective, in the context of the RMA, National Policy Statement on Urban Development 2020 (NPS-UD), NPS-HPL and WRPS.</p> <p>We have some concerns about the robustness of the Economic Assessment provided with the plan change application. Our key concern is that while the assessment analyses the Future Proof Business Development Capacity Assessment 2023 (BDCA) and presents a conclusion about the accuracy of this assessment (i.e. that the BDCA industrial land demand forecasts are underestimated and unreliable for decision-making), the report does not quantify what the industrial development capacity/sufficiency is (or therefore the expected shortfall of industrial land) within the relevant locality and market over the NPS-UD timeframes. Without this, we consider the report does not provide sufficient evidence to determine whether the proposed plan change meets the relevant provisions of the NPS-HPL or WRPS.</p>	That a more detailed and robust economic assessment of PC14 be undertaken, in order to demonstrate that the proposed plan change gives effect to Clause 3.6 of the NPS-HPL and aligns with the relevant provisions of the WRPS and Proposed WRPS Change 1 – Decisions version.
19.	Economic Assessment	Further assessment required	<p>We also have some general concerns about the adequacy and robustness of the Economic Assessment. Examples of specific points that we consider would benefit from further clarification/assessment include:</p> <ul style="list-style-type: none"> • It is not clear whether PC14 is proposed to provide for Fonterra's operations or cater to the general industrial market. To assist in understanding the economic rationale and effects of the proposed plan change, we consider it would be useful to clarify this point. • There seems to be some inconsistency in the assessment of costs and benefits of PC14. In some cases, the report argues that the growth PC14 will enable would otherwise happen elsewhere in the region, so costs are just moved from one location to another, and therefore the proposed plan change will not result in additional costs. Whereas, the benefits do appear to be counted as additional benefits (the final two paragraphs on page 9 of the report provide an example of this). 	That a more robust economic assessment be undertaken to support the proposed plan change.

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			<ul style="list-style-type: none"> • It is unclear what pattern the statement on page 18, paragraph 2 that “[t]his pattern...can be expected to persist over the next 30 years” is referring to (i.e. that employment growth can be expected to align with labour force growth, or that employment can be expected to grow more quickly than the population?) • The statement on page 20, paragraph 1 that “the conversion between employment growth and actual industrial land demand has already been accounted for in the observed employment density...by land use type...” needs further explanation (for example, we are unsure whether this is referring to new industrial demand or includes existing space). • We have concerns about the ‘recent growth trends’ analysis in Section 4.4. The 2020-2023 period considered in this section was significantly impacted by the COVID-19 pandemic, and many economic indicators were likewise affected. We consider that using a single year’s employment growth figure (e.g. in paragraph 2 of this section) is highly selective. • The report states (on page 23, paragraph 1), that “If the recent growth trajectory is sustained, the future employment growth of the sub-region is likely to be notably higher than the BDCA 2023 forecasts” (emphasis added). However, the remainder of the report seems to be based on the assumption that this will be the case. Therefore, we consider that the statement on page 24 that “[g]iven both the recent and historical growth of the industrial sectors, it is evident that the industrial land demand forecasts in the BCDA 2023 are underestimated for Waipā and the broader sub-region” is not currently supported by sufficient evidence. • The report refers in multiple places to economies of scale and business agglomeration benefits. We consider it would be useful to provide references to published evidence to support these statements in the context of a market of this size. 	

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			We consider that providing a more robust economic assessment would assist in the assessment of PC14 against the relevant higher-order policy documents under the RMA.	
20.	Economic Assessment	Further assessment required	<p>Section 5.1 of the Economic Assessment addresses the implications of Plan Change 19 - Carter's Flat in the context of industrial land provision in Cambridge.</p> <p>We note that Plan Change 17 – Hautapu Industrial Zones (PC17), which became operative in January 2024, uplifted the Deferred Industrial Zone for the C9 Growth Cell and rezoned approximately 20ha of land ('Area 6') from Rural to Industrial Zone. The Section 32 analysis for PC17 identified that the plan change would help to alleviate some industrial land pressure from the rezoning of Carter's Flat, by providing the option for existing industrial activities at Carter's Flat to relocate to the Hautapu Industrial Zone. Furthermore, in response to a submission on PC17, a further approximately 16ha of land ('Area 7') was rezoned from Rural to Deferred Industrial through this plan change (we note that Section 4.1 of the Economic Assessment notes that a private plan change is currently being prepared to 'live zone' this land).</p> <p>Given the recent rezoning of industrial land within the Hautapu Industrial Structure Plan Area (partially to support the relocation of industrial activities from Carter's Flat), we consider that in order for the rezoning of Carter's Flat to be treated as a justification for PC14, further analysis should be provided to quantify the likely extent of additional land required for these relocations.</p>	If the rezoning of Carter's Flat is to be considered as a justification for PC14, provide further analysis to quantify the likely extent of additional land requirements for the relocation of industrial activities from Carter's Flat, taking into account the recent rezoning of land at Hautapu through PC17.
Central Focal Area				
21.	Structure Plan, Rule 7.4.1.1(x), Assessment criteria 21.1.1.7.19	Support	<p>We support limiting the Central Focal Area for the Mangaone Precinct to providing for small-scale retail and service activities that will service the day-to-day needs of industrial businesses in the surrounding area.</p> <p>We highlight the importance of ensuring the Central Focal Area is of a size and function that will not undermine the vitality or viability of the Cambridge town centre or create an inefficient use of industrially zoned land, in accordance with Policy UFD-P13 of the WRPS.</p>	<p>Retain the limited range of activities proposed to be permitted within the Central Focal Area under Rule 7.4.1.1(x).</p> <p>Retain Assessment criteria 21.1.1.7.19.</p>

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Long-tailed bats and bat habitat				
22.	Structure Plan	Support	<p>Long-tailed bats are a Threatened - Nationally Critical species present in the Waipā area. The Ecological Values and Effects Assessment and bioacoustic bat surveys undertaken by Bluewattle Ecology identify that long-tailed bats are using the PC14 site as foraging or commuting habitat and that the site contains potential bat roost trees.</p> <p>We support the proposed creation of the Mangaone Stream Reserve to protect the riparian margins of the Mangaone Stream and protect and enhance identified bat habitat on the plan change site.</p> <p>We highlight the importance of retaining the proposed size of the reserve and buffer around the identified High Value Bat Habitat Area to maintain the functionality of the reserve area as habitat for long-tailed bats given the proposed development of the remainder of the plan change site for industrial activities.</p>	Retain the proposed extent of the Mangaone Stream Reserve on the structure plan, including the buffer around the identified High Value Bat Habitat Area.
23.	Structure Plan	Support with amendment	<p>We support the identification of the High Value Bat Habitat Area on the proposed Mangaone Precinct Structure Plan. We note this area is referred to in the proposed provisions (e.g. Assessment criteria 21.1.1.20), however the structure plan does not provide an explanation/definition of this area.</p> <p>To aid in the assessment of future resource consent applications, we consider it would be useful for Appendix S27 to provide a description of the High Value Bat Habitat Area and its purpose/function.</p>	Add a description of the High Value Bat Habitat Area and its purpose/function to Appendix S27 - Mangaone Precinct Structure Plan.
24.	Section 7 – Industrial Zone proposed objectives and policies	Support with amendment	<p>We support the introduction of proposed Objective 7.3.4h. and Policy 7.3.4.11 to protect and enhance the ecological values of the Mangaone Stream and natural wetlands.</p> <p>Given that the plan change proposes a number of rules to manage adverse effects on long-tailed bats, as recommended by Bluewattle Ecology, we consider an objective and policy relating to the protection and enhancement of long-tailed bats and their habitat should also be added for the Mangaone Precinct.</p>	Add an objective and policy relating to the protection and enhancement of long-tailed bats and their habitat within the Mangaone Precinct.

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			<p>We suggest the policy should include reference to the measures recommended by Bluewattle Ecology to address adverse effects on long-tailed bats, including minimising light intensity and spill.</p> <p>Having a cascade of objectives, policies and rules would better give effect to the relevant provisions of the WRPS ECO chapter and assist with the assessment of future resource consent applications.</p>	
25.	Rule 7.4.2.5A	Support	We support this proposed rule requiring buildings to be setback at least 5m from the boundary of the Mangone Stream Reserve in accordance with the recommendations of Bluewattle Ecology.	Retain
26.	Rule 7.4.2.42	Support	<p>We support this proposed rule for the Mangaone Stream Reserve to mitigate adverse lighting effects on long-tailed bats, in accordance with the recommendations of Bluewattle Ecology.</p> <p>We seek to ensure that this rule will continue to apply to the reserve and High Value Bat Habitat Area once the reserve is vested in Waipā District Council.</p>	Retain
27.	Rule 15.4.2.91A	Support with amendments	<p>We support the requirement under proposed Rule 15.4.2.91A(d) for the preparation of a Mangone Stream Reserve Management Plan as part of the first subdivision or land use consent application for the PC14 site. However, we query whether the words “for industrial purposes” are appropriate within this rule, particularly given that development of the PC14 site for industrial purposes is not proposed to commence until at least 2028.</p> <p>We also recommend that an additional rule be added requiring all future resource consent applications for the Mangaone Precinct to be consistent with the approved management plan.</p>	<p>Retain Rule 15.4.2.91A(d) but consider deleting the words “for industrial purposes”.</p> <p>Add a rule requiring all subsequent subdivision and land use consent applications for the Mangaone Precinct to be consistent with the approved Mangone Stream Reserve Management Plan.</p>
28.	Rule 15.4.2.91A(f) and (g)	Support with amendments	We support the proposed requirement for the Mangone Stream Reserve to be vested in Waipā District Council as part of the first subdivision consent for the plan change site. This will provide certainty of the future management and protection of the reserve and its ecological values.	Retain Rule 15.4.2.91A(f) but amend to also require the management of the Mangaone Stream Reserve to

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			<p>However, we recommend that proposed Rule 15.4.2.91A(f) be amended to also require that the management of the Mangaone Stream Reserve occurs in accordance with the approved management plan.</p> <p>We suggest that Rule 15.4.2.91A(g) be amended to require that the Mangaone Stream Reserve is planted and fenced as part of the first subdivision or land use consent application for the Mangaone Precinct.</p>	<p>occur in accordance with the approved Mangone Stream Reserve Management Plan.</p> <p>Amend Rule 15.4.2.91A(g) to apply to the first subdivision or land use consent for the Mangaone Precinct.</p>
29.	Assessment criteria	Support with amendment	<p>We support proposed Assessment criteria 21.1.1.20 relating to adverse effects on the ecological values of the High Value Bat Habitat Area from light intensity and light spill.</p> <p>We recommend considering whether any other assessment criteria are required to ensure adverse effects on long-tailed bats and their habitat are appropriately considered in the assessment of resource consent applications within the Mangaone Precinct.</p>	<p>Retain Assessment criteria 21.1.1.20.</p> <p>Consider whether any further assessment criteria are required in relation to long-tailed bats and their habitat.</p>
30.	Rule 21.2.7.1	Support with amendment	<p>We generally support the proposed information requirements for the Mangaone Stream Reserve Management Plan, including the specific assessment criteria in relation to the High Value Bat Habitat Area.</p> <p>In regard to proposed clause a., as stated in point 22 above, we seek to ensure that the extent of the Mangaone Reserve remains consistent with that shown on the proposed Structure Plan, given that this is based on one of the recommendations of Bluewattle Ecology to address adverse effects on long-tailed bats and their habitat.</p>	<p>Retain but amend a. to ensure the area and extent of the reserve is in accordance with that shown on the Mangaone Precinct Structure Plan.</p>
Aquatic ecology				
31.	Structure Plan and stormwater	Neutral	<p>It appears that a number of the farm drainage canals on the plan change site are piped at their point of entry to the Mangaone Stream. We recommend there is open access from the drains/wetlands to the Mangaone Stream, with no perches</p>	<p>Ensure that the future design of the proposed reserve and stormwater network</p>

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	management design		(if these are perched) so that fish can freely travel between habitats. Ideally, this would include removing the pipes if possible.	provides open access from the drains/wetlands to the Mangaone Stream to provide for fish passage.
Stormwater management and flood modelling				
32.	Stormwater Management Plan (Appendix G to the plan change application)	Neutral	We have not undertaken any technical stormwater assessment of the proposed plan change at this stage. However, we provide some high-level comments in relation to the Stormwater Management Plan below, where we consider further clarification or assessment to be required.	None
33.	Stormwater Management Plan	Further assessment required	In Table 1 within Section 3.0 of the Stormwater Management Plan, the assessment has mixed up volume retention versus detention. The proposed stormwater wetlands will not provide volume retention, only detention (attenuation of peak flows).	Clarify how the proposal will comply with the Waikato Stormwater Management Guideline 2020 to address volume retention.
34.	Stormwater Management Plan	Neutral	The Mangaone Stream forms part of WRC's Waikato Central Land Drainage Scheme. We note that the stream is not managed to accommodate urban runoff flows, therefore it will be imperative to manage stormwater volume flows.	Ensure the stormwater management approach appropriately manages volume flows to the Mangaone Stream.
35.	Stormwater Management Plan	Neutral	The plan change proposes to manage peak flows by attenuating to the 2, 10 and 100 year ARI events in the stormwater wetlands. However, given the Mangaone Stream is in a floodplain, it will be difficult for the wetlands to effectively attenuate the peak flows if they are inundated by flood flows.	Ensure the constructed stormwater wetlands will be outside of the 100-year flood extent, to ensure these properly function as intended.

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36.	Stormwater Management Plan	Neutral	To assist with understanding the proposed stormwater management approach, we query whether Waipā District Council will seek stormwater discharge consent for the entire PC14 area and manage all the stormwater discharges from private developments, or whether it is intended that private developers within the PC14 area will seek their own stormwater discharge consents.	Clarify whether Waipā District Council proposes to seek stormwater discharge consent for the entire PC14 area and manage all the stormwater discharges from private developments.
37.	Stormwater Management Plan	Further assessment required	<p>Section 4.0 (and Appendix 1) of the Stormwater Management Plan describes and provides the results of hydraulic modelling undertaken to assess the impact of future development of the PC14 area on the flood behaviour of the Mangaone Stream.</p> <p>We request further detail and clarification in order to understand the modelling and its outputs, specifically:</p> <ul style="list-style-type: none"> • The modelling uses catchment-based hydrology for the development area in the post-development scenario. The development area in the pre-development scenario is modelled using rainfall on grid with the losses removed from the rainfall. The inconsistent approach to hydrology may obscure some of the effects of the development. Therefore, we consider further detail as to how net rainfall was calculated would be helpful. • It would be useful to model the post-development scenario in a greater level of detail, as the catchment-based hydrology does not provide any information about flood depths and flows within the site. • The initial abstraction used in the post-development scenario is higher than the pre-development. We seek clarification on this, as this seems counter-intuitive. • We note the same surface roughness is used in the pre- and post-development scenarios. We would assume that moving from pasture to pavement and building roofs would reduce surface roughness. We consider a more detailed roughness map rather than a single value would also be helpful, as areas adjacent to the stream where riparian 	Provide further detail and clarification in relation to the hydraulic modelling, to enable a full assessment of the potential flood hazard effects of the proposed plan change.

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			<p>planting has been undertaken will have a higher roughness than short grazed pasture.</p> <ul style="list-style-type: none"> • We note the Waikato Regional Council Technical Report 2018/02 referenced in Table 6 has been superseded by 2020/06. • The proposed design will concentrate the existing diffuse inflows to the existing wetlands to point sources at the orifice outlets from the constructed wetlands. We recommend some consideration be given to the impacts of this on the existing wetlands. • Further detail as to how the various culverts along the Mangaone Stream have been modelled would be helpful. • The representation of the stream channel has been based on LiDAR. This may not adequately represent the channel bed if this was obscured by vegetation and water when the LiDAR was flown. Therefore, we consider more detail as to how the stream channel has been represented in the model would be useful. We also note that the 2007/08 LiDAR was used, whereas more recent LiDAR is available. • The effect of the development on the adjacent sites does not appear to have been considered in the modelling. 	
WRC land drainage network				
38.	Structure Plan	Support in part	<p>The portion of the Mangaone Stream which crosses the PC14 site is currently managed by WRC as part of the Waikato Central Land Drainage Scheme. This portion of the stream provides land drainage services for the plan change site and the upstream Swayne Road area. The land drainage is mandated under the Land Drainage Act 1908. The level of service that WRC is contracted to provide as per the Land Drainage Management Plan is to drain water off pasture within three days up a 10-year storm (10% ARI) event.</p> <p>As part of its land drainage responsibilities, WRC regularly undertakes the following activities:</p> <ul style="list-style-type: none"> • Site inspections – to check for weed build-up, blockages caused by fallen trees/vegetation, bank erosion/damage that may require fixing. 	That Waipā District Council works with WRC's Integrated Catchment Management Directorate to ensure that the design of the Mangaone Stream Reserve allows WRC's land drainage activities to co-exist with the ecological, cultural and recreational functions of the proposed reserve, and that the land drainage level of service to

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			<ul style="list-style-type: none"> • Spraying of weeds– typically done twice a year (in spring and autumn). WRC would also undertake cleaning (silt and/or vegetation removal) of the stream approximately every 15-20 years. <p>To continue to undertake these activities, WRC requires vehicle access to the stream within the plan change site (access would be for a 4x4 ute for inspections/spraying and 12t digger for blockages and possible erosion works and future cleaning). This access should be formalised by putting an easement in place to ensure land drainage activities are protected into the future.</p> <p>With the proposed vesting of the Mangaone Stream Reserve in Waipā District Council, future management of the stream will require a collaborative approach with WRC’s Integrated Catchment Management Directorate, which considers the stream in the context of the wider catchment.</p> <p>As such, we seek that Waipā District Council works with WRC to ensure the plan change provides for the design of the Mangaone Stream Reserve (including planting, walking and cycling paths and vehicle access) to allow WRC’s land drainage activities to co-exist with the ecological, cultural and recreational functions of the proposed reserve. Alternatively, if was to be agreed that Waipā District Council will take over responsibility for managing this portion of the drainage network in the future, collaboration would be required to ensure WRC is able to maintain the required land drainage level of service to properties up and down stream of the plan change site.</p> <p>WRC staff would be happy to meet with Waipā District Council staff to discuss this submission point further.</p>	properties up and down stream of the plan change site can be maintained.
Transport				
39.	Integrated Transport Assessment (Appendix H to	Support in part	The Integrated Transport Assessment has a focus on promoting resilience to current and future effects of climate change through consideration of flood risk and stormwater management but does not appear to include an assessment that considers emissions reduction (transport being a major source of	Provide an assessment of the proposed plan change in relation to transport

Submission point	Provision	Support/ oppose	Submission	Relief sought
	the plan change application)		<p>greenhouse gases and a contributing factor to climate change) despite the need to consider the Emissions Reduction Plan (as per s74(2)(d) of the RMA).</p> <p>We do, however, acknowledge that due to the functional needs of industrial areas, continued reliance on cars and trucks is anticipated.</p>	emissions reduction and the Emissions Reduction Plan.
40.	Structure Plan and Section 7 – Industrial Zone/Section 16 – Transportation	Support in part	<p>We support the inclusion of walking and cycling infrastructure in the proposed structure plan and recommend ensuring this is connected to the existing network.</p> <p>We recommend additional provisions be added to the plan change that support people to use alternative modes of travel, for example Crime Prevention through Environmental Design (CPTED) principles, end-of-journey facilities and electric vehicle (EV) charging facilities.</p> <p>When implemented, the CPTED principles provide actual and perceived safety outcomes, and therefore encourage walking and cycling. The Residential Zone of the Waipā District Plan already includes policies and other provisions that consider CPTED principles.</p> <p>End-of-journey facilities and EV charging facilities are important factors in transport emissions reduction. Requiring provision of end-of-journey facilities would encourage people to use the cycleways proposed in the plan change. Meanwhile, EV charging facilities enable charging of EVs at employment sites (beyond those that might serve business fleets).</p> <p>We recommend provisions be added requiring provision of end of journey facilities and EV charging facilities (including for heavy vehicles), either in Section 7 – Industrial Zone or Section 16 – Transportation (or other appropriate location within the plan).</p>	<p>Add new objectives, policies, rules and standards into the plan change to address climate change and transport emission goals in the context of increased industrial activity in this location.</p> <p>Add provisions referencing CPTED principles and requiring provision of end-of-journey facilities and EV charging facilities (including for heavy vehicles).</p>

Submission point	Provision	Support/ oppose	Submission	Relief sought
41.	Integrated Transport Assessment	Support in part	<p>The proposed plan change relies on supplementary material such as the Integrated Transport Assessment and previous commentary from WRC in relation to public transport to support the proposed industrial zoning.</p> <p>We note that while WRC supports and encourages employment activities in locations that are or can in the future be served efficiently by public transport (as per the General Development Principles in APP11 of the WRPS), there are specific policies in the operative Waikato Regional Public Transport Plan that should be taken into consideration. These are:</p> <ul style="list-style-type: none"> • P67 – Development of new urban areas, redevelopment and/or the expansion of existing urban areas should be undertaken in a way that is consistent with the urban form and transport design factors such as proximity, linearity, connectivity, and land use intensity, as outlined in Appendix B. • P68 – The council will not provide public transport services sufficient to enable well-functioning urban areas where the nature and location of the proposed urban development is inconsistent with the urban form and transport design factors outlined in Appendix B. <p>There may be future opportunities for public transport in this area. We note that while there is a Cambridge/Hautapu frequent public transport service identified in the Future Proof Strategy (being a 30-year growth strategy), the RPTP as a 10-year plan does not include a public transport node at Hautapu. We therefore recommend continued discussions with the public transport planning team at WRC.</p>	<p>Ensure the proposed plan change considers the relevant provisions of the Waikato Regional Public Transport Plan.</p> <p>That Waipā District Council continues to work with WRC in relation to public transport planning for the plan change area.</p>

Further information and hearings

WRC **wishes to be heard** at the hearings for Proposed Plan Change 14 - Rezoning Part of C10 Growth Cell to the Waipā District Plan in support of this submission and is prepared to consider a joint submission with others making a similar submission.

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

Submitter details

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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.