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Dear Sir/Madam

Waikato Regional Council Submission to Proposed Private Plan Change 20 – Airport Northern Precinct Extension to the Waipā District Plan

Thank you for the opportunity to make a submission on the Proposed Private Plan Change 20 – Airport Northern Precinct Extension to the Waipā District Plan. Please find attached the Waikato Regional Council's submission regarding this document. This submission was formally endorsed by the Director Science, Policy and Information under delegated authority on 27 October 2022. 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, Policy Advisor, Strategic and Spatial Planning directly on (07) 8590 929 or by email Katrina.Andrews@waikatoregion.govt.nz.

Regards,

Tracey May
Director Science, Policy and Information

Submission from Waikato Regional Council on Proposed Private Plan Change 20 – Airport Northern Precinct Extension to the Waipā District Plan

27 October 2022

Introduction

1. Waikato Regional Council (WRC) appreciates the opportunity to make a submission to Proposed Private Plan Change 20 – Airport Northern Precinct Extension. 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)).
2. The key areas of interest relate to the WRPS and Future Proof land use pattern, high class soils/highly productive land, bats and bat habitat, transport, and climate change considerations.
3. WRC acknowledges the intent to increase the supply of industrial land in a strategic location. However, we consider that multiple aspects and effects of the plan change request have not been sufficiently addressed, particularly in relation to high class soils and bats/bat habitat.
4. Our submission makes recommendations for further assessments and changes to the proposed provisions to better give effect to the WRPS and other regional policies and plans.

WRPS and Future Proof Strategy

5. We recommend that a more detailed assessment of the plan change is needed in relation to Topic UFD – Urban Form and Development of the WRPS, and an assessment be prepared in relation to the Proposed Change 1 - National Policy Statement on Urban Development 2020 and Future Proof Strategy update to the WRPS which was notified on 18 October 2022.
6. Section 7.5 of the plan change request provides an assessment against the WRPS. We consider that this assessment does not sufficiently address some provisions of the WRPS, in particular, Method UFD-M49 which sets out the criteria that must be met in order for district plans and structure plans to consider an alternative industrial land release.
7. Clause 2 of UFD-M49 requires robust and comprehensive evidence to justify a proposed exceedance of the total land allocation identified in Table 35 for any one strategic industrial node; including but not limited to, planning, economic and infrastructural/servicing evidence. The proposed private plan change 20 request is supported by an Economic Assessment (Appendix 7) prepared by Insight Economics. We have some concerns about this report, specifically:
 - a. The report asserts that leasehold land in the Ruakura industrial area will be less attractive and not be taken up at all. If this occurs, is not clear from the report why this might not lead to an adjustment in relative prices, i.e., would the Ruakura land not meet demand at a reduced price? We seek clarification on this as the 'constraints matrices' in Tables 3 and 4 currently disregard a significant portion of Ruakura land due to it being 'unattractive' to the market.
 - b. More generally, the figures in the constraints matrices seem to be arbitrary. It is not clear within the report why these have been chosen in favour of another set.
 - c. We consider the columns in the constraints matrices are unlikely to be independent of each other. We do not think it is necessarily appropriate to simply add the columns together to give a total 'constraint' factor.
 - d. The constraints also do not seem to consider the type of demand growth described in Section 7.8 of the report. This demand could be expected to affect relative prices and, consequently, affect the percentage estimates of constraints in the matrices. This may be implied within the numbers in the report, however, there is little explanation or justification for the chosen numbers in the report.

- e. The report adopts an employment rate of 81 percent, which is stated to come from Ministry of Business, Innovation and Employment (MBIE) figures ‘adjusted’ for differences in working age definitions. We query the type of adjustment applied, as 81 percent is significantly higher than figures reported by MBIE. We recommend that further clarification is required in relation to these calculations, as the result affects the conclusion on demand for land reached in the report.
 - f. Section 11.5 of the report states that the plan change land is currently in ‘low-value rural’ use but does not provide any evidence about what this is, nor whether there are any non-market values that should be considered outside of the values that are capitalised into the price of the land.
8. Clause 4 of UFD-M49 promotes that the effects of the change are to be consistent with the development principles set out in APP11 of the WRPS. We consider that a more comprehensive assessment is needed against these principles than that provided in the plan change application. In particular, we recommend that principles f., g., h., i., k., m., n., p. and t. be assessed in further detail.
 9. The WRPS directs that commercial development be managed to support and sustain the vitality and viability of existing commercial centres identified in Table 37 (within APP12) and that industrially zoned land be maintained for industrial activities unless it is ancillary to those industrial activities (UFD-P13). The plan change proposes a total gross floor area (GFA) of 5,000m² for non-ancillary retail activities located within the Northern Precinct under new Rule 10.4.2.11A. This is in addition to the 5,300m² of GFA for non-ancillary retail activities provided for elsewhere in the Airport Business Zone under Rule 10.4.2.11. We are concerned that this GFA is significantly higher than that required to provide for the day-to-day needs of workers within the zone and has potential to undermine the centres hierarchy within Future Proof and the WRPS due to both the total GFA proposed and the potential size of individual retail units this would allow for. The amount of GFA proposed to be available to non-ancillary retail activities also represents an inefficient use of industrial land.
 10. To give effect to Policy UFD-P13 and ensure the plan change does not undermine the commercial centres hierarchy, we consider the total GFA for non-ancillary retail activities should be reduced to only the level necessary to cater to the day-to-day needs of workers and people visiting the precinct for business purposes.
 11. Proposed Change 1 - National Policy Statement on Urban Development 2020 and Future Proof Strategy update to the WRPS (Proposed Change 1) was notified on 18 October 2022. This change incorporates the requirements of the National Policy Statement on Urban Development 2020 (NPS-UD) and reflects the updated Future Proof Strategy. Section 74(2) of the RMA requires that when changing a district plan, a territorial authority shall have regard to any proposed regional policy statement. Accordingly, the provisions of Proposed Change 1 need to be addressed by proposed private plan change 20.
 12. We consider that an assessment is needed to address the following provisions of Proposed Change 1:
 - a. UFD-P11 – Adopting Future Proof land use pattern, clause 7.

This clause directs that where out of sequence or unanticipated urban land release patterns are promoted through district plan and structure plan processes, justification shall be provided to demonstrate consistency with the principles of the Future Proof land use pattern and particular regard shall be had to the proposed development capacity if the local authority determines that the proposal is significant, by assessing the proposal for consistency with the responsive planning criteria in APP13.
 - b. UFD-M49 – Out-of-sequence or unanticipated urban development.

UFD-M49 is proposed to be amended through Proposed Change 1 to the WRPS. The amended method provides that district plans and structure plans can only consider an alternative urban land release provided that the listed clauses are met. These clauses refer to both the development principles within APP11 and new responsive planning criteria within APP13. We recommend that further assessment is required in relation to Clauses 1, 3, 5 and 6.

- c. APP11 Development principles.
Principle p. is proposed to be amended through Proposed Change 1 to promote greater consideration of the effects of climate change and support reductions in greenhouse gas emissions within urban environments.
 - d. APP13 Out of Sequence development criteria.
The two sets of criteria in APP13 have been developed through Future Proof to assist local authorities in responding to district plan or structure plan proposals when they are out of sequence or unanticipated by the Future Proof settlement pattern. In particular, we recommend that further assessment is required in relation to Criteria A Clauses C., D., M., N., O., P. and Q. and Criteria B(C).
13. We note Criteria A(O) of APP13 directs that development avoids areas identified as as wāhi toitū on Map 44. The proposed plan change area is identified as wāhi toitū and therefore there has been a strong preference to avoid development as agreed by WRC and Waipā District Council through the Future Proof process.
14. Proposed Change 1 (UFD-PR11) advises that collectively the criteria within APP13 are intended to assist territorial authorities to determine whether a proposed plan change would create significant development capacity. It will be at the discretion of the relevant territorial authority to undertake a comprehensive assessment and give the appropriate weighting to the criteria, depending on the particular circumstance.
15. Ultimately, we strongly recommend that the plan change comprehensively considers the out of sequence development criteria within APP13.
- 16. Recommendations:**
- a. **That a more detailed assessment of the proposed plan change be undertaken in relation to Topic UFD – Urban Form and Development of the WRPS and the assumptions within the Economic Assessment be clarified to assist this.**
 - b. **Amend Rule 10.4.2.11A to reduce the total GFA for non-ancillary retail activities to only the level necessary to cater to the day-to-day needs of workers and people visiting the precinct for business purposes.**
 - c. **That an assessment of the proposed plan change be undertaken in relation to the Proposed Change 1 - National Policy Statement on Urban Development 2020 and Future Proof Strategy update to the WRPS.**

High class soils

17. The WRPS seeks to avoid a decline in the availability of high class soils for primary production due to inappropriate subdivision, use or development (LF-O5, LF-P11). Method LF-M41 directs that district plans shall give priority to productive uses of high class soils including, among other actions, through restricting urban development on these soils.
18. The above provisions are relevant to the proposed plan change given the proposal to rezone an area of high class soils from Rural to Airport Business Zone. However, they have not been assessed within the plan change application.
19. The application mentions that the land is currently used for low-value rural purposes, is already fragmented, and will become further fragmented by Southern Links in the future. We do not consider this to be sufficient justification for removing high class soils from productive use. The plan change area comprises approximately 89ha of contiguous Rural Zoned land, bisected only by Middle Road. The application does not clarify what is meant by 'low-value rural' purposes, however, Objective LF-O5 and Policy LF-P11 refer simply to protecting the availability of high class soils for primary

production; the WRPS definition of 'primary production' does not require that production to be of a certain economic value.

20. In terms of fragmentation, while the land may be under multiple ownership at present, that does not preclude it from being owned and used for primary production by a single owner in the future. Additionally, as the plan change application notes, the future of the Southern Links project remains uncertain.
21. The National Policy Statement for Highly Productive Land (NPS-HPL) came into force on 17 October 2022 and sets a strong directive to protect highly productive land for use in primary production. In accordance with clause 3.5(7), as the plan change area contains Land Use Capability (LUC) Class 1, 2 and 3 soils, it must be treated as highly productive land for the purpose of the applying the NPS-HPL until a regional policy statement containing maps of highly productive land in the region is operative. Therefore, the relevant objectives, policies, and methods of the NPS-HPL also need to be addressed in the proposed plan change.

22. Recommendation:

- a. **That a robust assessment of the proposed plan change be undertaken against both the WRPS provisions relating to high class soils and the NPS-HPL.**

Bats and bat habitat

23. We strongly recommend that the provisions for bats and bat habitat are strengthened to meet the direction of the WRPS, particularly Policies ECO-P1, ECO-P2 and ECO-P3 and Method ECO-M13.
24. Waipā District Council's Strategic Planning and Policy Committee endorsed the Waikato Regional Bat Strategy in November 2021. This Strategy was prepared on behalf of the Waikato Bat Alliance, a cross-council, multi-organisation group which includes council staff representatives from Waipā District Council, WRC, Hamilton City Council and Waikato District Council as well as representatives from the Department of Conservation (DOC), Waikato Tainui, Ngā Iwi Tōpū O Waipā, Ngati Wairere and Te Haa o te Whenua o Kirikiriroa.
25. A key outcome of this strategy is to align plans, policies and methods for bat habitat protection and restoration through high level strategic collaboration between alliance members. District plan changes are identified as opportunities to resolve issues around bat habitat protection.
26. Bats are a nationally critical threatened species that have a significant presence in southern Hamilton, including north Waipā. They are a highly mobile species, with varied habitats for roosting, foraging, commuting, and socialising. Section 6 of the Assessment of Ecological Effects (Appendix 8 to the plan change request) identifies that bat habitat in the Northern Precinct meets the criteria for significant indigenous biodiversity (as significant habitat of indigenous fauna) under the WRPS.
27. It is unclear who undertook the bat assessment for the plan change and whether they are suitably qualified with appropriate experience in bat ecology and we seek clarification on this. We have some concerns about the Assessment of Ecological Effects, specifically:
 - a. Acoustic bat monitors (ABMs) were deployed in areas bats would most likely use based on habitat characteristics (predominantly large mature trees and shelterbelts). Bats also use open fields for foraging and we note in Appendix A that very few ABMs were deployed in open fields despite the acknowledgement in the plan change application that the site is mainly used by bats for foraging and commuting.
 - b. The findings on the distribution of bats are based on where the ABMs were placed and are biased towards large mature trees and shelterbelts.
 - c. It is highly likely that bats are also roosting on neighbouring properties and using the plan change area as foraging grounds but the report did not take a wider landscape approach to assessment.

- d. None of the surveys were undertaken during December/January (peak breeding season).
 - e. There was only one survey undertaken on the Rukuhia Properties Limited property, so the conclusions that bats are not using this property frequently are premature.
28. To give effect to WRPS Policy ECO-P2, we recommend that further assessment is required to inform this plan change to ensure that bat habitat will be sufficiently protected. An option to consider is to map and set aside a corridor to be maintained as bat habitat to ensure continued connectivity across the site and with neighbouring areas. We recommend a collaborative approach with ecologists and other relevant stakeholders involved in this process as per WRPS Policy ECO-P3.
29. We also recommend that bat habitat is defined in the plan, which particularly references the importance of connectivity of habitats and identifies roost trees especially as needing protection.
30. The plan change application suggests that removal of bat habitat will be avoided in the first instance, but the plan provisions do not follow through on this. Policy 10.3.2.2A does not prioritise avoidance, instead using “mitigate” and “where practicable, support the maintenance or enhancement of”. This wording does not give effect to the WRPS which seeks district plans require activities to avoid loss of significant habitat of indigenous fauna in preference to remediation or mitigation (ECO-P2 and ECO-M13). It also conflicts with the first part of the policy and the objective it seeks to implement (24.3.1) which set out to maintain or enhance significant long-tailed bat habitat values and the existing level of biodiversity.
31. No net loss is a key concept of WRPS Policy ECO-P1 which cannot be achieved in terms of bat habitat removal. When bat roost trees are felled or removed, bats may not be able to easily move to another equally suitable roost because they may be already occupied by other bats, or they may not be available because of their rarity. Each known roost in the southern Hamilton/northern Waipā area is likely to be of high value to the local bat population and therefore should be protected. Adverse effects on bat habitat cannot be offset as it is currently not known how to successfully recreate or replicate the properties and values of bat habitat.
32. Proposed Rule 10.4.2.14A requires an Ecological Management Plan (EMP) to be created for the Northern Precinct which includes a Bat Management Plan (BMP), a Lighting Management Plan, and recommendations for landscape planting. While we support the requirement for an EMP, we consider the current plan wording will not sufficiently protect bats and bat habitat or give effect to the WRPS.
33. It is unclear why the elements of the EMP have been separated and we are concerned this means the BMP, Lighting Management Plan and planting recommendations may not align. It is our strong preference for there to be one integrated plan that incorporates elements of a BMP, lighting plan, and planting recommendations that work in conjunction. We recommend Rule 10.4.2.14A specifies that the elements of the EMP are required to be prepared at the same time. If each part is prepared by a different specialist, it is important that the plan is reviewed as a whole by a suitably qualified ecologist.
34. We also recommend Rule 10.4.2.14A specifies that the EMP, and its different elements, are required to be prepared by a suitably qualified ecologist who specialises in long-tailed bats. We also ask that the plan change requires the EMP to be peer reviewed by DOC and WRC ecologists.
35. Rule 10.4.2.14A(a) sets out the requirements for the BMP which we consider are insufficient to ensure thorough assessment and protection of bats and bat habitat. The Assessment of Ecological Effects acknowledges that the plan change area is used for bat roosting and foraging, so it is unclear why the BMP is only required to cover roost trees. We recommend assessment needs to extend to all functional bat habitat areas.

36. The current wording of Rule 10.4.2.14A(a) is framed in a way that does not prioritise avoidance of bat habitat removal, and already implies that trees will *need* to be removed. We recommend rewording of this provision as follows:

“A Bat Management Plan that:

- Identifies all potential bat roost trees and functional bat habitat areas within the Northern Precinct.
- Provides an analysis of the practicability of retaining each potential roost tree as part of the development of the Northern Precinct in line with the Structure Plan and identifies any trees that need to be removed, including reasons why.
- Specifies best practice tree removal protocols and mitigation for any potential roost trees that have been identified as needing to be removed, and methods to mitigate associated ecological effects. Where any ecological effects are unable to be mitigated, the Bat Management Plan shall set out methods to ensure that any more than minor residual ecological effects are offset to achieve a no net loss outcome.
- Sets out how areas which are identified as bat habitat areas are to be managed to ensure effects on bats are to be avoided or managed.
- Identifies the extent to which development can provide for trees identified as actual or potential roost trees to be protected in perpetuity.
- Sets out how BMP initiatives link to other areas immediately outside of the Northern Precinct to create a consistent approach. It is important for the BMP to take into account connectivity to the wider landscape where there are known roost trees and bat habitat areas.
- Includes a methodology for pre- and post- development monitoring for bats using, as a minimum automated bioacoustics bat detectors.
- Includes a tree-felling monitoring regime that includes, at a minimum:
 - An assessment of the trees/vegetation proposed to be felled.
 - Identified methodology of how acoustic or visual monitoring is to be undertaken in accordance with best practice to establish the presence of roosting bats.
 - Best practice tree removal protocols.
 - Identified methodology to mitigate associated ecological effects to achieve a no net loss outcome.
- Sets ongoing monitoring obligations.
- Includes pest control measures.
- Includes proposals for any off-site compensation to address residual adverse effects on bats and to achieve a net biodiversity gain such as habitat enhancement, targeted predator control or financial contributions.”

37. It is unclear why Rule 10.4.2.14A(b) sets out a 20m buffer around the perimeter of the precinct but no other buffers are proposed within the structure plan area. Buffers around bat habitat areas are a useful tool to manage potential adverse effects on bats and we recommend they are also considered in the EMP (both the BMP and Lighting Management Plan) to be applied throughout the precinct. As per paragraph 28, a corridor or shelter belt could be set aside to provide for commuting and foraging habitat.

38. We support Rule 10.4.2.14A(c) and the requirement for the EMP to include recommendations for landscape planting to encourage bat foraging and/or commuting.

39. The expectation set out through the WRPS is that proposals should reasonably demonstrate that no net loss has been achieved using methodology that is appropriate and commensurate to the scale and intensity of the adverse effects (ECO-PR2). It is anticipated that there is no human-induced loss of indigenous species or their natural range within the region (ECO-AER8) and that fragmentation of indigenous ecosystems, habitats and areas is reduced (ECO-AER9). It is our view that this plan change does not currently satisfy these matters.

40. Recommendations:

- a. **Require further assessment to inform the proposed plan change to ensure that bat habitat will be sufficiently protected, through a collaborative approach with ecologists and other relevant stakeholders involved in this process.**
- b. **Consider mapping and setting aside a corridor to be maintained as bat habitat to ensure continued connectivity across the site and with neighbouring areas. Amend Rule 10.4.2.14A(b) to require buffers around habitat areas throughout the precinct.**
- c. **Define ‘bat habitat’ within the plan provisions.**
- d. **Amend Policy 10.3.2.2A to prioritise avoidance of bat habitat removal as signalled within the plan change application.**
- e. **Amend Rule 10.4.2.14A to require:**
 - i. **The EMP, and its different elements, to be prepared by a suitably qualified ecologist who specialises in long-tailed bats;**
 - ii. **The elements of the EMP to be prepared at the same time;**
 - iii. **If each part is prepared by a different specialist, the EMP to be reviewed as a whole by a suitably qualified ecologist; and**
 - iv. **The EMP to be peer reviewed by DOC and WRC ecologists.**
- f. **Reword Rule 10.4.2.14A(a) to prioritise avoidance of bat habitat removal and protect all functional bat habitat areas, not just roost trees.**

Transport

41. The proposed plan change is generally consistent with regional priorities, objectives and policies articulated in the operative Regional Land Transport Plan (RLTP) and the WRPS as it pertains to transport matters. However, there are further opportunities to effect real change in relation to integrated land use and transport planning, and the required reduction of transport emissions which are a major contributor to climate change. Embedding climate change policies and requirements into this plan change is critical to supporting the transformational change that is necessary to address the effects of climate change that is included in national and regional policy.
42. Objective UFD-O1 and Policy UFD-P1 of the WRPS refer specifically to transport and require regard to be had to the General Development Principles in APP11. Principle APP11i. directs that new development should 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.*
43. The above factors need to be considered in the proposed plan change. Every opportunity to avoid short car trips and encourage walking or cycling to activities and services within a local area, should be prioritised. We acknowledge that due to the airport’s location, and the functional needs of the surrounding industrial area, continued reliance on cars and trucks is anticipated. However, we consider there is scope to strengthen policy wording around transport emissions reduction and how it might be achieved. This is most apparent in the exclusion of Section 16 – Transportation from the proposed plan change.
44. We support the final row of the table within Rule 10.4.2.13A relating to walking and cycling and seek that this be retained. The construction of walking and cycling infrastructure prior to subdivision and development in the Northern Precinct will help to encourage travel behaviour that is less car-reliant

and may avoid embedding the use of private motor vehicles to travel to and from a large employment centre.

45. It is noted that the proposed plan change relies on supplementary material such as the Integrated Transport Assessment, and previous commentary from WRC around public transport to support industrial zoning in this area. It should be noted 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 Regional Public Transport Plan (RPTP) that should be taken into consideration. These are:
- 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.
46. The nature and location of urban development can have a strong influence on WRC's ability to provide effective and efficient public transport services. While the airport is identified as being a key transport interchange and part of the Hamilton Future Frequent Network in the RPTP, it is not yet clear which side of the airport might be served by such a service in the future. A large employment area in the Northern Precinct, severed from the terminal on the other side of the airport by the runway may mean that WRC cannot provide frequent public transport services to both locations. Careful consideration should be given to the internal road network and connectivity between the western and eastern sides of the airport to ensure there is easy and convenient access between the two locations.
47. There is no reference to climate change and the contribution that transport makes to emissions within the plan change. We suggest that new objectives, policies, rules, and standards be added into the plan to address climate change and carbon emission reduction goals in the context of increased industrial activity in this location/zone.
48. Other matters that are omitted from the proposed plan change relate to Crime Prevention through Environmental Design (CPTED) principles, end of journey facilities and electric vehicle (EV) charging facilities.
49. We recommend references to CPTED principles be added to the plan change provisions. When implemented, these principles provide actual and perceived safety outcomes, and therefore encourage walking and cycling.
50. End of journey facilities and EV charging facilities are important factors in transport emissions reduction. End of journey facilities encourage people to use the cycleways identified in the plan change. EV charging facilities enable charging of EVs at employment sites (beyond those that might serve business fleets). We recommend provisions be added requiring provision of end of journey facilities and EV charging facilities, either in Section 10 – Airport Business Zone or Section 16 – Transportation (or other appropriate location within the plan).
51. 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.

52. We note a minor editorial matter in that Section 10.1.1 of the proposed plan provisions refers to State Highway 21 being located to the west of the airport, rather than the east. We recommend that this be corrected to identify State Highway 21 as being to the east of the airport.

53. Recommendations:

- a. **Consider the internal road network and connectivity between the western and eastern sides of the airport to ensure there is easy and convenient access between the two locations.**
- b. **Add new objectives, policies, rules, and standards into the plan change to address climate change and carbon emission reduction goals in the context of increased industrial activity in this location/zone.**
- c. **Add provisions referencing CPTED principles and requiring provision of end of journey facilities and EV charging facilities, either in Section 10 – Airport Business Zone or Section 16 – Transportation (or other appropriate location within the plan).**

Further information and hearings

WRC **wishes to be heard** at the hearings for Proposed Private Plan Change 20 – Airport Northern Precinct Extension 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

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.