

**IN THE MATTER** of the Resource Management Act 1991

**AND**

**IN THE MATTER** of the Hearing for Proposed Plan Change 26 –  
Residential Zone Intensification to the Operative  
Waipā District Plan

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**STATEMENT OF EVIDENCE OF HANNAH CRAVEN**  
**For the Waikato Regional Council**  
**DATED 6 APRIL 2023**

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## **Introduction**

1. My name is Hannah Craven and I am a Senior Policy Advisor in the Strategic and Spatial Planning team in the Strategic Policy Implementation Section at Waikato Regional Council (WRC). I have been in this role since October 2022. Prior to this I was a Policy Advisor and Graduate Policy Advisor in the same team.
2. I hold a Bachelor's degree in Environmental Planning. I have 2.5 years of experience in the field of regional policy implementation. I am an intermediate member of the New Zealand Planning Institute.
3. As a member of the Strategic and Spatial Planning Team for WRC I am involved in implementing the Waikato Regional Policy Statement (WRPS) and working with the territorial authorities of the Waikato region and with neighbouring regional councils to assist in the development of consistent integrated regional policy.
4. I am the Project Manager and Section 42A report author for Proposed Change 1 to the Waikato Regional Policy Statement - National Policy Statement on Urban Development 2020 and Future Proof Strategy update (WRPS Proposed Change 1) which updates the WRPS to give effect to the National Policy Statement on Urban Development 2020.
5. I confirm that I am familiar with the Code of Conduct for Expert Witnesses as set out in the Environment Court Practice Note 2023. I have read and agree to comply with the Code. Except where I state that I am relying upon the specified evidence or advice of another person, my statement is within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed.

## **Scope of Evidence**

6. My statement of evidence is given on behalf of WRC. WRC staff made a submission and a further submission to each of the three Intensification Planning Instruments (IPIs) for Waipā District Council (Waipā DC), Hamilton City Council (HCC) and Waikato District Council (WDC).
7. I attended the Joint Opening Hearing for the IPIs in February 2023 with my colleague Katrina Andrews, who provided evidence on behalf of WRC at the hearing. Ms Andrews prepared the WRC staff submissions on Plan Change 12 for HCC and Variation 3 for WDC whilst I prepared the WRC staff submission on Plan Change 26 (PC26) for Waipā DC.
8. The WRC submissions on the IPIs addressed alignment of the IPIs with the policy direction within the WRPS, with a focus on the relationships between urban intensification, transport and infrastructure planning, climate change and ecological outcomes.
9. My statement reinforces the WRC staff submission (submission 30) and further submission (FS1) on PC26 and reflects my professional opinions as a senior resource management policy

advisor. I also rely on the opinions of Ms Andrews in her statement of evidence on 'strategic matters' from the Joint Opening Hearing.<sup>1</sup>

10. I recognise the mandate placed on Waipā DC by central government to undertake PC26 to implement the medium density residential standards (MDRS) and appreciate that the urban environments within the Waipā District are of a different scale and have different characteristics than other urban areas which the MDRS typically apply to.
11. My evidence focuses on:
  - The responses to WRC's submission points by the s42A author.
  - The approach to giving effect to Te Ture Whaimana in PC26.
  - The approach to transport and climate change in PC26.
12. My assessment is primarily based on the provisions and information supplied in the plan change documents, the policy direction set out in the WRPS (including WRPS Proposed Change 1), and the Future Proof Strategy.

### **Summary of Evidence**

13. WRC's primary interest in PC26 is in relation to the WRPS. Districts plans are required to 'give effect to' the WRPS under section 75(3)(c) of the Resource Management Act 1991 (RMA).
14. WRC has also recently prepared a change to the WRPS (WRPS Proposed Change 1) to give effect to the National Policy Statement on Urban Development 2020 (NPS-UD) and reflect the updated Future Proof Strategy, which provides direction for growth across the sub-region of Hamilton city and Waikato and Waipā districts.
15. In this instance, the key topics of interest to WRC in PC26 are:
  - Alignment with regional policy direction for urban growth.
  - Matters required to give effect to Te Ture Whaimana and effects on freshwater bodies.
  - Integration between land use, infrastructure, and transport planning, including impacts for climate change outcomes.
16. I am generally supportive of PC26 and the recommendations of the s42A author, including the approach to giving effect to Te Ture Whaimana by applying infrastructure and stormwater constraint overlays.
17. Overall I consider PC26 to be generally consistent with regional priorities, objectives and policies articulated in 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,

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<sup>1</sup> Statement of evidence of Katrina Rose Andrews for the Waikato Regional Council, 31 January 2023.

<https://www.waipadc.govt.nz/repository/libraries/id:26gz4o7s1cxbyk7hfo7/hierarchy/our-council/waipadistrictplan/documents/Plan%20Change%2026/Session%201%20-%20IPI%20Joint%20High%20Level%20Issues%20Hearing/Submitters%20Strategic%20Evidence/15%20Katrina%20Andrews%20on%20behalf%20of%20WRC.pdf>

and the required reduction of transport emissions which are a major contributor to climate change.

### **Waikato Regional Policy Statement and WRPS Proposed Change 1**

18. I do not intend to cover in detail the policy direction of the WRPS in my evidence. I will refer to specific sections of the WRPS where I consider it relevant.
19. I note that district plan changes, including PC26 are required to give effect to the WRPS. The WRPS sets out a largely regulatory approach to planning for urban growth, by directing district plans to manage development in accordance with WRPS policies and methods.
20. I also note that Section 74(2)(a) of the RMA requires that when changing a district plan, a territorial authority shall have regard to any proposed regional policy statement. Therefore, the provisions of WRPS Proposed Change 1 are relevant for the Panel to consider when making decisions on the IPIs.
21. WRPS Proposed Change 1 was notified after notification of PC26, on 18 October 2022. The hearing for WRPS Proposed Change 1 will commence on 8 May 2023. The purpose of WRPS Proposed Change 1 is to give effect to the NPS-UD and incorporate the updated Future Proof Strategy.
22. I note that Waipā DC made a further submission (but no initial submission) on WRPS Proposed Change 1.<sup>2</sup> The further submission supported the submission made by Future Proof and sought that WRPS Proposed Change 1 is approved subject to amendments required to give effect to the National Policy Statement for Highly Productive Land 2022 and other minor amendments.
23. Ms Andrews' statement of evidence for the Joint Opening Hearing provides more background for the panel on the urban form and development chapter of the WRPS, the Future Proof Strategy and its recent update, and WRPS Proposed Change 1.

### **Section 42A recommended response to WRC submission and further submission**

24. **I support** all recommendations of the s42A author which accept WRC's submission points and align with the relief sought through the WRC further submission. I do not address these points further in this evidence.
25. I address the submission points which were either rejected or not fully accepted by the s42A author in the sections of my statement below.

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<sup>2</sup> Waipā District Council further submission on WRPS Proposed Change 1, 13 February 2023.

<https://waikatorc.sharepoint.com/sites/externalsharing/Shared%20Documents/Forms/AllItems.aspx?id=%2Fsites%2Fexternalsharing%2FShared%20Documents%2FDigital%20%2D%20general%2FRPS%20NPSUD%2FFS2%2E%5FWaipā%5FDistrict%5FCouncil%5Ffurther%5Fsubmission%5Fon%5FWRPS%5FChange%5F1%2Epdf&parent=%2Fsites%2Fexternalsharing%2FShared%20Documents%2FDigital%20%2D%20general%2FRPS%20NPSUD&p=true&ga=1>

## **Te Ture Whaimana o Te Awa o Waikato – Vision and Strategy for the Waikato River**

26. Te Ture Whaimana (TTW) is the primary direction setting document for the Waikato River and its catchment. Cambridge, Te Awamutu and Kihikihi are all located within the Waikato River catchment. TTW has a unique legislative position in that it is deemed in its entirety to be part of any WRPS.<sup>3</sup> Furthermore, the government has directed that TTW prevails over any inconsistent RMA planning instrument, including any National Policy Statement.
27. TTW is embedded within Section 1.9 of the WRPS. This is supported by other objectives, policies, and methods throughout the WRPS which seek to manage effects of activities on freshwater bodies. Policy LF-P5 recognises TTW as the primary direction setting document for the Waikato River and its catchment, and the need to develop an integrated, holistic, and coordinated approach to implementation.
28. Implementation method LF-M26 relates to implementation of TTW within regional and districts plans, and directs that these documents shall:
1. *recognise the Vision and Strategy for the Waikato River as the primary direction-setting document for the Waikato River and its catchment; and*
  2. *ensure activities within the Waikato River catchment (refer to Map 23) are controlled with respect to any adverse effects on the health and wellbeing of the Waikato River, including activities which:*
    - a. *result in the destabilisation of the beds and banks of waterbodies;*
    - b. *result in discharges of contaminants to water bodies;*
    - c. *result in adverse effects on significant sites, fisheries, flora and fauna;*
    - d. *result in a loss of public access; and*
    - e. *adversely affect the cultural association of Waikato-Tainui, Ngāti Tūwharetoa, Te Arawa River Iwi, Maniapoto and Raukawa with the Waikato River.*
29. Method LF-M20 directs that territorial authorities should manage the effects of subdivision, use and development on freshwater bodies, including through district plans. This includes considering:
1. *the availability of water, including by encouraging water conservation measures;*
  - ...
  3. *development and design that minimises the potential for contaminants to enter fresh water bodies and coastal water;*
  4. *managing flows into stormwater networks including through the adoption of low impact design;*
  - ...
  6. *the promotion of best practice stormwater management for urban areas, including the need for stormwater catchment plans for greenfield urban development; and*
  7. *managing contaminant loadings (including sediment) entering stormwater networks.*
30. WRPS Proposed Change 1 proposes an amendment to section 1.9.4 of the WRPS to recognise that TTW is a qualifying matter in relation to applying the medium density residential

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<sup>3</sup> Waikato Raupatu Claims (Waikato River) Settlement Act 2010 section 11

standards and Policy 3 of the NPS-UD. This means that plan provisions can be less enabling of urban development than required under the RMA or the NPS-UD where necessary to accommodate a matter to give effect to TTW.

31. I also note WRC's role as a consenting authority in relation to three waters infrastructure in the Waipā district. In addition to giving effect to TTW, other national direction on freshwater and the WRPS, it is important that territorial authorities plan for growth in a way that achieves compliance with regional resource consents for water takes and discharges.
32. **I support** the approach to giving effect to TTW in PC26 by applying the infrastructure constraint qualifying matter overlay and the stormwater constraint qualifying matter overlay. I note I am not an expert in three waters infrastructure capacity or stormwater management so I defer to the experts of Waipā DC on whether these overlays have been determined appropriately.
33. **I also support** the amendments recommended by the s42A author to include an advice note to refer to the Waikato Regional Stormwater Management Guideline in the performance standard for stormwater.
34. However, I am unclear on the s42A response and recommendation to WRC's submission point 30.30 which sought additional detail to provisions in the issues and objectives and policies sections of Section 2A to outline potential effects of increased impermeable surfaces.
35. The s42A recommended response is to reject this submission point and address the matter through an advice note. I cannot see that this has been included in the s42A recommended tracked changes to provisions. I remain of the view that additional detail in the plan to inform plan users of the potential effects of increased impermeable surfaces would be useful, whether it be upfront in the strategic policy framework, or set out through issues, or via an advice note.
36. **I recommend** additional wording to the effect of:  
*"Urban intensification is likely to result in an increase in impermeable surfaces within urban environments. It is important for the district plan to manage potential adverse effects that can result from increased impermeable surfaces such as:*
  - *Increased erosion of waterway channels*
  - *Increased flooding risk*
  - *Decreased drainage levels of service (specifically the Hautapu and Fencourt drainage districts adjacent to the northern boundary of Cambridge)*
  - *Increased temperatures which impact freshwater species*
  - *Increased contaminants and decreased water quality."*
37. I consider this would fit best in either:
  - Section 2A – Medium Density Residential Zone - Qualifying Matters – Te Ture Whaimana and the National Policy Statement for Freshwater 2022; or

- Section 2A – Medium Density Residential Zone – Resource Management Issues – Health and well-being of the Waikato and Waipā Rivers or
- A new issue section: Increased impermeable surfaces.

### **Transport and climate change**

38. The WRPS promotes that development, including transport and other infrastructure, and associated land use, occurs in a planned and coordinated manner. The objectives, policies, and implementation methods within the Urban Form and Development (UFD) chapter set out how this issue should be managed throughout the region.
39. For the Future Proof sub-region of Hamilton city and Waikato and Waipā districts, the WRPS provides a particularly clear and detailed framework for achieving the integration of land use and infrastructure planning. Objectives and policies anchor the settlement pattern for the sub-region developed through the Future Proof Strategy into the WRPS and, together with implementation methods, and support a growth model which:
- Supports and connects to existing and planned urban areas.
  - Provides for urban intensification and redevelopment to minimise the need for greenfield development.
  - Integrates land use and infrastructure planning and ensures the safe, efficient and effective operation of existing and future infrastructure.
  - Promotes compact urban form and maximises opportunities for people to live, work and play in their local area.
40. Further, a general development principle within the WRPS is to promote compact urban form, design, and location to support climate change and transport outcomes.
41. I also note that while the panel must not ‘have regard to’ the Emissions Reduction Plan (ERP) and National Adaptation Plan (NAP),<sup>4</sup> the intention to have regard to the ERP was signalled in the 2020 amendment to the RMA and the ERP itself was published in May 2022 (prior to notification of PC26). Further, there are other parts of the existing legislative and policy framework which warrant consideration of climate change, including the RMA, NPS-UD, and WRPS.
42. The Future Proof Strategy also contains directives for transport planning, including ensuring that neighbourhoods are planned and designed to make public transport use, walking, and cycling easy and attractive.<sup>5</sup>

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<sup>4</sup> This requirement under section 74(2)(d) and (e) of the RMA only came into force on 30 November 2022 which was after the notification of PC26. Schedule 12, clause 26(3) of the RMA requires that proposed plan changes which were publicly notified before the effective date of the climate change amendments must be determined as if the climate change amendments had not been enacted.

<sup>5</sup> Future Proof Strategy, 2022.

<https://waikatorc.sharepoint.com/sites/externalsharing/Shared%20Documents/Forms/AllItems.aspx?id=%2Fsites%2Fexternalsharing%2FShared%20Documents%2FDigital%20%2D%20general%2FFuture%2DProof%2Dstrategy%2FFPS%2Dfull%2Ddocument%2Epdf&parent=%2Fsites%2Fexternalsharing%2FShared%20Documents%2FDigital%20%2D%20general%2FFuture%2DProof%2Dstrategy&p=true&ga=1>

43. As demonstrated in national and regional policy,<sup>6</sup> there is an implicit relationship between urban intensification and transport planning. Quite simply, if the density of an area is going to increase, there needs to be a plan as to what is going to be done with the extra cars.
44. Urban form, growth and travel behaviour all influence transport's contribution to climate change. Intensification is likely to have an impact on the transport networks of the urban environments subject to the MDRS, and the design of urban environments in turn impacts significantly upon travel behaviour, as well as the operation of public transport.
45. The WRC submission identified that PC26 "missed an opportunity" to recognise the implicit relationship between land use and transport planning, and consequentially, the relationship between transport and climate change, specifically relating to emissions reduction. It noted: *"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 are now embedded in national and regional policy."*
46. The submission sought various amendments to better integrate the intensification provisions with positive transport and climate change outcomes such as to:
- Encourage walking, cycling and public transport use and support multi-modal transport connections as urban areas intensify.
  - Reduce reliance on private motor vehicles for most daily needs, and therefore contribute to transport emissions reduction. This included seeking increased provision for mixed-use areas.
  - Promote safety outcomes and reduce conflicts between transport modes.
  - Mitigate adverse effects of increased intensification on the safe and efficient operation of the transport network.
47. As Ms Andrews addressed in her evidence for the Joint Opening Hearing, I agree that WRC's submission points relating to climate change are within the scope of PC26. Whilst I note the Themes and Issues report ahead of the Joint Opening Hearing identified these submission points as potentially out of scope, neither the panel nor the s42A report author have indicated they agree.
48. To briefly reiterate the points of Ms Andrews:
- The WRC submission on PC26 did not seek for climate change to be included as a qualifying matter, nor seek to limit the application of the MDRS.
  - Supporting reductions in greenhouse gas emissions and resilience to the likely current and future effects of climate change are essential aspects of well-functioning urban environments as defined in the NPS-UD (Policy 1).

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<sup>6</sup> Specific policies and provisions from national and regional policy documents on this matter are set out in Appendix A to this statement.



- When making planning decisions that affect urban environments, decision-makers should have particular regard to the likely current and future effects of climate change (NPS-UD Policy 6).
- Regional direction in the WRPS also makes clear links between urban planning and climate change.

49. The s42A author recommends accepting the WRC submission points which relate to climate change, yet notes that these are in part already embedded in Council design and development standards and are best practice, and that a more robust response to climate change may be undertaken for the entire District Plan at a later date. Ultimately minimal changes are recommended by the s42A author to address these submission points.

50. Whilst I **support** the recommended amendments made to address the WRC submission points, and agree the plan will require a full update to better incorporate climate change at a later date, I **consider** further amendments could be made to better integrate transport and climate change outcomes within PC26.

51. I acknowledge that the scope of PC26 is limited to implementing the MDRS and so I only recommend changes to chapter 2A – Medium Density Residential Zone.

52. Wording for these amendments could be influenced by the notified provisions of HCC's equivalent plan change, Plan Change 12, which includes provisions for transport and climate change, recognising that increased residential density will have impacts on transport. I consider these provisions provide good examples of how transport and climate change can be integrated into objectives and policies for a residential zone and recommend below a series of additions to section 2A in PC26 in line with the notified provisions of HCC's Plan Change 12.

Amend objective 2A.3.4: *To recognise amenity values and enhance safety in the Medium Density Residential Zone including:*

- i. *On site for residents;*
- ii. *On adjoining sites, and*
- iii. *For the transport corridor and public open spaces.*

Insert new policies 2A.3.4.X and 2A.3.4.Y: *Vehicle crossings*  
*Limit the number of vehicle crossings to prioritise pedestrian and cyclist safety and amenity on public roads or publicly accessible spaces used to give access to development.*

*Ensure vehicle crossings are minimised on road frontages where narrow dwellings are proposed and where shared paths and separated cycle ways are located.*

Insert new policy 2A.3.4.Z: *Tree canopy*  
*Promote the establishment and maintenance of a continuous tree canopy along transport corridors to improve amenity for corridor users and adjoining land use, minimise the urban heat island effects of urban intensification, enhance biodiversity and ecological function,*

provide summer shade to make the corridors more comfortable for walking, cycling, and micro-mobility during hotter weather, and store carbon.

Insert new objective and policies 2A.3.11: Climate change Residential development incorporates sustainable features, technologies and methods to minimise the effects of climate change and reduce greenhouse gas emissions.

2A.3.11.1 Ensure development implements methods and technologies to minimise the effects on climate change, including:

- i. Locating land uses and densities in such a way as to support walking, cycling, micromobility and public transport
- ii. Providing for electric mobility and its associated charging infrastructure.

2A.3.11.2 Reduce embodied greenhouse gas emissions and operational greenhouse gas emissions.

53. **I recommend** the above objectives and policies be inserted into section 2A and apply within the Medium Density Residential Zone. These would achieve the relief sought by WRC to incorporate climate change and emissions reduction goals and climate resilience into PC26.
54. In the absence of more comprehensive climate change and emissions reduction provisions that align with national and regional policy across the district, it is even more important that PC26 acknowledges the implicit relationship between intensification, transport and climate change.

## **Conclusion**

55. The WRC staff submission was supportive of PC26 and recognised that the change is directed by central government requirements. Many of the provisions within PC26 align with direction in the WRPS relating to integrated and coordinated planning.
56. **I support** all recommendations of the s42A author which accept WRC's submission points and align with the relief sought through the WRC further submission.
57. **I support** the approach to giving effect to Te Ture Whaimana by applying infrastructure and stormwater constraint overlays.
58. **I recommend** additional detail in the plan to inform plan users of the potential effects of increased impermeable surfaces.
59. I also consider there are further opportunities to effect real change in relation to integrated land use and transport planning, and the potential to reduce transport emissions which are a major contributor to climate change. National, regional, and local policy direction in relation to emissions reduction is very clear. Local government is expected to consider and include climate change in its planning and decision making. 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.

60. **I recommend** additional provisions to recognise the implicit relationship between urban intensification, transport and climate change.

A handwritten signature in black ink, appearing to read 'Hannah Craven', with a stylized, cursive script.

Hannah Craven  
Senior Policy Advisor  
Strategic and Spatial Planning  
**Waikato Regional Council**

**6 April 2023**

## Appendix A – National and regional direction on urban development, transport and climate change

### RMA

#### 7 Other matters

In achieving the purpose of this Act, all persons exercising functions and powers under it, in relation to managing the use, development, and protection of natural and physical resources, shall have particular regard to—

...

- (i) the effects of climate change

### NPS-UD

**Objective 6:** Local authority decisions on urban development that affect urban environments are:

- (a) integrated with infrastructure planning and funding decisions; ...

**Objective 8:** New Zealand’s urban environments:

- (a) support reductions in greenhouse gas emissions; and
- (b) are resilient to the current and future effects of climate change.

**Policy 1:** Planning decisions contribute to well-functioning urban environments, which are urban environments that, as a minimum:

...

- (e) support reductions in greenhouse gas emissions; and
- (f) are resilient to the likely current and future effects of climate change.

**Policy 6:** When making planning decisions that affect urban environments, decision-makers have particular regard to the following matters:

...

- (e) the likely current and future effects of climate change.

### WRPS

#### **IM-05 – Climate change**

Land use is managed to avoid the potential adverse effects of climate change induced weather variability and sea level rise on:

1. amenity;
2. the built environment, including infrastructure;
- ...
5. public health and safety.

#### **UFD-01 – Urban form and development**

Development of the built environment (including transport and other infrastructure) and associated land use occurs in an integrated, sustainable and planned manner which enables positive environmental, social, cultural and economic outcomes, including by:

...

3. integrating land use and infrastructure planning, including by ensuring that development of the built environment does not compromise the safe, efficient and effective operation of infrastructure corridors

...

#### **UFD-P1 – Planned and co-ordinated subdivision, use and development**

Subdivision, use and development of the built environment, including transport, occurs in a planned and co-ordinated manner which:

1. has regard to the principles in APP11;
2. recognises and addresses potential cumulative effects of subdivision, use and development;

**UFD-AER2** - There is greater use of walking, cycling and public transport in urban areas.

**UFD-AER11** - New urban developments are more compact

#### **APP11 – General Development Principles**

- i. Promote compact urban form, design and location to:
  - i. minimise energy and carbon use;
    - (a) minimise the need for private motor vehicle use;
    - (b) 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;
    - (c) encourage walking, cycling and multi-modal transport connections; and
    - (d) maximise opportunities for people to live, work and play within their local area.

#### WRPS Proposed Change 1

##### **SRMR-I2 – Effects of climate change**

The effects of climate change (including climate variability) may impact our ability to provide for our wellbeing, including health and safety.

While addressing this issue generally, specific focus should be directed to the following matters:

...

3. ability for urban environments to support a reduction in greenhouse gas emissions and to be resilient to the current and future effects of climate change.

##### **IM-O5 – Climate change**

...

2) support reductions in greenhouse gas emissions within urban environments and ensure urban environments are resilient to the current and future effects of climate change.

##### **UFD-O1 – Urban form and development**

Development of the built environment (including transport and other infrastructure) and associated land use occurs in an integrated, sustainable and planned manner which enables positive environmental, social, cultural and economic outcomes, including by:

...

12) strategically planning for growth and development to create responsive and well-functioning urban environments, that:

a. support reductions in greenhouse gas emissions and are resilient to the current and future effects of climate change;

...

e. improves connectivity within urban areas, particularly by active transport and public transport;

#### **UFD-P12 – Density targets for Future Proof area**

Future Proof territorial authorities shall seek to achieve compact urban environments that:

...

2. support multi-modal transport options, including active transport and rapid and frequent public transport;

3. allow people to live, work and play within their local area;

4. support the delivery of a range of housing options;

5. enable building heights and density of urban form to realise as much development capacity as possible to maximise benefits of intensification within city centre zones unless modified to accommodate a qualifying matter;

...

#### **UFD-PR12 – Density targets for Future Proof area**

UFD-P12 seeks to ensure that over time, urban development will become more compact through the promotion of development density targets. This is to improve housing choice and affordability, walking and cycling, and the viability of public transport, including rapid and frequent public transport, thereby reducing energy demand and reducing the need for future transport infrastructure development. Other benefits of this approach include reducing transport impacts on air quality, reducing greenhouse gas emissions, improving efficient use of water infrastructure, ... The methods are to ensure this policy is implemented through provisions in district plans and through advocacy with respect to development proposals...

**UFD-AER23** - Reduced greenhouse gas emissions in tier 1 and 3 urban environments.

#### **APP11 – General Development Principles**

p. be appropriate with respect to current and projected future effects of climate change and be designed to allow adaptation to these changes and to support reductions in greenhouse gas emissions within urban environments;