

BEFORE AN INDEPENDENT HEARINGS PANEL

THE PROPOSED WAIKATO DISTRICT PLAN (STAGE 1)

UNDER the Resource Management Act 1991 (**RMA**)

IN THE MATTER OF hearing submissions and further submissions on the
Proposed Waikato District Plan (Stage 1) Hearing 1:
Topic 1 - Introduction

BY **HAVELOCK VILLAGE LTD**
Submitter

**PRIMARY EVIDENCE OF MARK SEYMOUR MANNERS TOLLEMACHE
ON BEHALF OF HAVELOCK VILLAGE LIMITED**

PLANNING

16 September 2019

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1. EXECUTIVE SUMMARY

- 1.1 Havelock Village Limited (**HVL**)¹ is a submitter and further submitter on the Proposed Waikato District Plan (**PWDP**). It manages sizeable landholdings in southern Pokeno at 88, 242 (in part) and 278 Bluff Road (**site**) and seeks Plan provisions to enable a comprehensive and integrated residential development on this site.
- 1.2 It lodged further submissions in relation to Chapter 1: Introduction to the PWDP and is generally in support of the notified version of the introduction. My evidence addresses the planning merit of an Introduction to a district plan and comments on specific parts of the Chapter that I consider raise resource management issues particularly relevant to HVL's site and requested relief.
- 1.3 I generally agree with the recommendations contained in the Section 42A report, including the proposal to delete unnecessary information from Chapter 1 and the description in Chapter 1 of how growth should be managed and the reasons for it.
- 1.4 I agree there is the potential for higher population growth in Auckland and constraints in accommodating growth within Auckland are likely to mean there is increased demand for housing within towns that adjoin the regional boundary like Pokeno. I consider it is likely to be necessary for the PWDP to address this risk through providing additional live zoned residential land. I expect this issue will be addressed in more detail through the upcoming hearing topics.
- 1.5 I also agree that references to the Franklin District Growth Strategy 2007 and Future Proof 2009 are somewhat outdated, and particularly for Pokeno there are more recent strategies that provide more guidance in the determining population projections and the management of growth.
- 1.6 There are also ongoing strategic planning processes that, depending on the outcome of later hearing topics for the PWDP and the status of those other strategic planning processes at the time, means that there may need to be further changes to the Introduction and other parts of the PWDP that recognise these strategic developments and their

¹ Submission 862.

implications for growth and anticipated settlement patterns in North Waikato.

- 1.7 I have proposed some minor text changes to Clause 1.3.4(c) to ensure that introduction to the Urban Growth issue is not tied to specific strategic documents or population limits that may prove to be outdated.

2. INTRODUCTION

2.1 My full name is Mark Seymour Manners Tollemache. I am an independent planning consultant and Director of Tollemache Consultants Limited.

2.2 I have the qualifications of a Bachelor of Planning (Hons) (1996) and Master of Planning (Merit) (1999) from the University of Auckland.

2.3 I have over 21 years' experience in planning. I have been an independent planning consultant since 2004 as Director of Tollemache Consultants Ltd. Prior to that, I held senior planner and planner positions at North Shore City Council and Common Ground Urban Design Ltd.

2.4 I have extensive experience in the preparation of District Plans, Plan Changes, resource consent applications, assessments of environmental effects and being an expert witness at hearings. Local experience includes Plan Changes associated with Pokeno, Belmont - Pukekohe, Kingseat, Franklin District's Rural Plan Change 14, Waikato District's Plan Change 2 / Plan Variation 13, Drury Plan Variation 15 / Plan Change 6 and Rotokauri North Plan Change and Special Housing Area, along with resource consents associated with Kingseat village, Karaka North village, Tuakau industrial, and Bombay quarry and managed fill.

2.5 I have read the Environment Court's Code of Conduct for Expert Witnesses, and I agree to comply with it. My qualifications as an expert are set out above. I confirm that the issues addressed in this brief of evidence are 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.

2.6 I was engaged by HVL to provide planning evidence in respect of the PWDP in in mid-2019. I did not prepare HVL's original submission or its further submissions.

Scope of evidence

2.7 My evidence provides planning assessment and commentary on:

- (a) The merits of including an Introduction in the PWDP and the general content of Chapter 1;
- (b) Specific resource management issues identified; and
- (c) The PWDP's general approach to those issues.

2.8 I have not undertaken an assessment against each of HVL's further submission points as I did not consider it necessary for this particular topic. Instead I have focused on the themes and matters of importance to HVL.

3. HAVELOCK VILLAGE LIMITED'S INTEREST

3.1 HVL is seeking Plan provisions to enable a comprehensive and integrated residential development on its site in Pokeno. The site is currently used for pastoral farming activities and zoned Rural in the notified version of the PWDP. Through its submission HVL is seeking that the existing Residential Zone of Pokeno be extended in a southerly direction, generally contiguous with the existing urban zones and planned form of Pokeno, to encompass its site subject to site specific provisions that implement a masterplan for residential development. Rezoning the site as residential would provide additional residential capacity to Pokeno and north Waikato.

3.2 HVL is therefore interested in a number of parts of the PWDP including:

- (a) Strategic Planning and Objectives;
- (b) Urban Development Capacity;
- (c) Growth management;
- (d) Industrial and Industrial Heavy Zones;

- (e) Residential Zone;
 - (f) Natural Environment provisions specifically in relation to significant natural areas and landscapes;
 - (g) Structure of Plan, including use of master plans and other spatial planning tools such as overlays or precinct provisions to provide for specific outcomes; and
 - (h) Rezoning requests in and around Pokeno.
- 3.3 HVL did not lodge a primary submission on the Introduction but lodged further submissions² on primary submissions made on Chapter 1 by Waikato Regional Council, the Mercer Residents and Ratepayers Committee, Auckland Council, Auckland Waikato Fish and Game Council, and the Waikato District Council. Details of those further submissions are set out in Appendix 1. HVL generally supported Chapter 1 as notified.

4. ROLE OF CHAPTER 1: INTRODUCTION

- 4.1 The notified version of Chapter 1 contains a mixture of:
- (a) A description of the Waikato District;
 - (b) General information on district plans;
 - (c) Issues for the District;
 - (d) A general description of how the PWDP addresses these;
 - (e) Information about the tangata whenua of the District; and
 - (f) Relevant statutory and planning directions and non-statutory plans.
- 4.2 Under section 75(2) of the Resource Management Act 1991, a district plan may state the significant resource management issues for the district. I consider Chapter 1 plays an important role in identifying those relevant issues for the Waikato District. This assists to formulate and understand the plan's objectives and other provisions.

² Further Submissions 1291 and 1377.

- 4.3 I have read the Council's section 42A report³ and I agree with the report's assessment⁴ that the Introduction provides the background which illustrates the PWDP's purpose and direction.
- 4.4 I do not consider it necessary to include other aspects of Chapter 1 like general information on district plans or statutory directions. For that reason, I agree with the proposal to delete unnecessary information from Chapter 1. I have not identified any of the deleted text that should be retained.
- 4.5 The section of Chapter 1 "What does it mean for Waikato" outlines in general terms how the significant resource management issues need to be addressed. I address specific wording below but as a general point, if there are major changes to the structure and approach of the Plan recommended as part of later hearing topics then Chapter 1 will be need to be amended to accurately reflect those amendments.

5. SIGNIFICANT RESOURCE MANAGEMENT ISSUES FOR THE DISTRICT

- 5.1 Section 1.2 of Chapter 1 outlines the significant resource management issues for the District.
- 5.2 Clause 1.2.1 describes the Demographic trends of the District as follows:

1.2.1 Demographic trends

Waikato district has a population of 73,600 (2017) and the population is expected to reach approximately 147,000 in the year 2063, with a consequent increase in the demand for land, infrastructure, services and amenities Statistics New Zealand (2014), Infometrics for E Tu Waikato (2014) and the National Institute for Demographic and Economic Analysis. The following trends in the population of the district are likely to have an impact on the future development of the district.

...

1.2.1.2 In-migration to the district

There is significant development pressure pushing into Waikato district from Auckland's southern area, which needs to accommodate 145,000 new dwellings in the next thirty years (or 36% of Auckland's growth). Towns near the Waikato-Auckland boundary have a common future as residential and business growth nodes. Any constraints on Auckland's ability to cater for its continued growth in the Franklin Local Board area (i.e. Pukekohe, Drury) will have spill-over effects into Waikato'

³ Prepared by Deborah Donaldson, dated 3 September 2019.

⁴ Above in 3, at 1.1.

1.2.1.3 Uneven population growth across the district

The spatial distribution of growth is expected to be very uneven over the next twenty years, with higher rates of population and dwelling growth in the northern urban towns of Pokeno, Tuakau, and Te Kauwhata, and in the south, in Tamahere and the 'Hamilton-periphery' area. By comparison, the central area of the district is projected to remain fairly static. People are drawn to the greater economic opportunities, connectivity, and access to services of urban areas, and particularly to larger urban areas. Another trend is the depopulation of the more remote rural areas that is expected to continue with ageing of the population. This trend could be accentuated with the Waikato Expressway by-passing the central Waikato towns of Huntly and Ngaruawahia.

5.3 I consider this description accurately reflects the demographic trends within the District. Of particular relevance to HVL's interests is the influence of the growth of Auckland and the transport network on the northern Waikato towns like Pokeno. Pokeno and Tuakau are in effect extensions of the Auckland Region's urban economy and sphere of influence and so in my opinion need to be managed with this in mind compared to other areas of the District more distant from Auckland.

5.4 I agree there is the potential for higher population growth in Auckland (and in particularly southern Auckland, Drury and Pukekohe) and constraints in accommodating growth within Auckland are likely to mean there is increased demand for housing within towns that adjoin the regional boundary like Pokeno. It may be necessary for the PWDP to address this risk through providing additional live zoned residential land over and above the existing anticipated demand. I expect this issue will be addressed in more detail through the upcoming hearing topics.

5.5 Clause 1.2.4 describes the resource management issues for the Urban Environment as follows:

The urban environment

- (a) A key issue for the district is to maintain the productive capacity of the rural resource and ensure that population growth and associated built development is managed in a way that results in efficient and high-amenity urban areas. Development needs to be managed so that emphasis is placed on achieving high amenity standards, while retaining existing valued characteristics as far as practicable. In these areas, development can support local infrastructure, services, and other facilities, while at the same time minimising adverse effects on productive rural activities ...
- (b) Costs and inefficiencies can increase significantly, where development patterns are dispersed. For example, unplanned development, which increases vehicle traffic, may reduce roading efficiency and road safety, compromise rail operations and result in

unplanned roading upgrades. Costs can be minimised, and better performance of infrastructure and services achieved, where infrastructure provision is timely in relation to demand, and optimally-sized and located. This may mean that it is necessary to stage infrastructure provision relative to growth in demand as well as ensuring that the natural environment is maintained and enhanced through Low Impact Design infrastructure.

- 5.6 I generally agree with the description of how growth should be managed and the reasons for it. I would emphasise it is important to protect highly productive rural land rather than any rural land.
- 5.7 Some submitters such as Waikato Regional Council have sought that specific reference is made to how the PWDP must give effect to the National Policy Statement on Urban Capacity (**NPS-UDC**). I agree this is a highly relevant consideration but do not consider it needs to be set out in the text of the PWDP. A determination on how the PWDP gives effect to the NPS-UDC should be part of the decisions of the Hearing Commissioners not a plan provision. There are already proposals to amend the NPS-UDC and I consider it is poor planning practice to refer to a document that may change over time and therefore make the provisions of the PWDP outdated.

6. HOW THE ISSUES ARE MANAGED

- 6.1 Section 1.3.1 is entitled “What does this means for Waikato” and outlines the resource management implications of the issues and how the PWDP addresses those.
- 6.2 Clause 1.3.1 describes the compact urban development:

Compact Urban Development

- (a) The Future Proof Strategy seeks a shift in the existing pattern of land use towards accommodating growth through a more compact urban form based on concentrating growth in and around **Hamilton (67%) and the larger settlements of the district (21%)**¹⁴. This involves a reduction in the relative share of the population outside of the subregion’s existing major settlements through tighter control over rural-residential development and encouraging greater urban densities in existing settlements. Due to the time that has elapsed, and local government amalgamation in 2010, this strategy is being reviewed to address that part of the former Franklin district now in Waikato district.
- (b) Urban forms of residential, industrial, and commercial growth in the district will be focused primarily into towns and villages, with rural-residential development occurring in Country Living Zones. Focusing urban forms of growth primarily into towns and villages,

and encouraging a compact form of urban development, provides opportunity for residents to “live, work and play” in their local area, minimises the necessity to travel, and supports public transport opportunities, public facilities and services.

- (c) An integrated approach to growth will have significant benefits in terms of planning for infrastructure, services, transport and facilities. It will ensure that provision is made when and where it will support the health and well-being of the wider community, and will provide certainty to landowners, developers and service providers for long-term investment decisions. A deliberate approach to the location and distribution of development will assist in safeguarding rural resources for productive use and the ability to accommodate rural activities that require a rural location. Non-rural industrial and commercial activities can only locate in rural areas if there is a functional need for a rural location. Country Living zones, where infrastructure and services can be efficiently and economically provided, will be the focus for rural residential development.

[As amended by the section 42A report]

- 6.3 I agree that a compact urban form is the most appropriate response to managing urban growth, the efficient provision of infrastructure and protecting highly productive rural land. A requirement to adopt a compact urban form for the urban areas of the Waikato District is outlined in Future Proof and the Waikato Regional Policy Statement. A compact form, in my opinion, is a preference to plan for the expansion and intensification of in this case towns. This provides for urban expansion and greenfields development in suitable locations and assists in the management of the remaining rural land for rural activities.
- 6.4 Clause 1.3.1(a) recognises that a significant amount of time has elapsed since the original Future Proof Strategy was adopted in 2009, and that this document excluded the northern towns of Tuakau and Pokeno (that were covered by the Franklin Growth Strategy 2007). I consider this is an appropriate statement and reflects the planning history of the former Franklin District and Pokeno.
- 6.5 Future Proof 2017 does include Pokeno, but it may already be superseded by more recent planning processes. Some submitters, such as Auckland Council, have sought that the PWDP be amended to reflect even those recent planning processes such as the Hamilton-Auckland Corridor Plan. Depending on the outcome of later hearing topics for the PWDP and the status of those other strategic planning processes at the

time of the Panel's recommendations, there may need to be further changes to the Introduction and other parts of the PWDP.

6.6 I also discuss Future Proof below in the context of the Urban Growth provisions.

6.7 Clause 1.3.2 outlines methods to plan for urban growth and development:

Planning for urban growth and development

- (a) Defined growth areas have been zoned and their development will be guided through the application of objectives and policies and through processes such as the development of master plans, comprehensive structure plans, the district plan and any future changes to the district plan. The agreed Future Proof settlement pattern for urban growth and development is to avoid unplanned encroachment into rural land and is to be contained within defined urban areas to avoid rural residential fragmentation.
- (b) ~~As per the Waikato Regional Policy Statement, the district plan ensures that before land is rezoned for u~~Urban development, urban development planning mechanisms such as master plans or structure plans are produced, that will facilitate proactive decisions about the future location of urban development. Development which occurs in accordance with a master plan developed in consultation with the local community is one way of ensuring that valued elements of local character are respected as growth occurs. Structure plans are to be used to guide the staged provision of additional urban land and infrastructure to support areas experiencing growth or sustaining population and business growth pressures.

[As amended by the section 42A report]

6.8 The clause identifies a range of potential mechanisms or methods to manage growth including master plans, structure plans, the PWDP and future plan changes. I agree that all methods can be appropriate in the correct circumstances. It is not always necessary or appropriate to require all urban development or greenfield development to go through a structure planning process, and the provisions appropriately recognises this. Other tools, such as master plans, can be appropriate. HVL has proposed a master plan to guide development of Havelock Village. The merits of this will be addressed in later hearing topics.

6.9 Clause 1.3.4 discusses Urban Growth:

Urban growth

- (a) Located between Auckland in the north and Hamilton in the south, increasing demands are placed on the Waikato district for the

development of transport corridors, water supply, waste disposal and community facilities. Waikato district also offers other facilities such as Hampton Downs Motorsport Park, Hampton Downs Landfill, Springhill Prison and Te Kowhai Airfield. It is important that there is coordination between land use and infrastructure planning by neighbouring councils to ~~ensure harmonious cross-boundary development~~ manage these demands.

- (b) Urban growth can result in unplanned urban expansion, increased rural land subdivision, rural lifestyle demands with associated reverse sensitivity issues and soil erosion compromising access to high quality soil and mineral resources that are of economic importance to the district and the region. The losses of rural land due to urban expansion can also compromise cultural and heritage values. Uncoordinated urban growth can adversely affect the quality, character and vitality of urban environments and undermine the efficient provision and utilisation of infrastructure and services.
- (c) It is important that the district's settlement pattern is consistent with the Future Proof Strategy's settlement pattern, as set out in the (RPS), with the expectation that any growth within Waikato district is managed ~~within the population and land allocation limits, as included in accordance~~ within the WRPS or as addressed by the Future Proof Strategy process and any future amendments and any subsequent changes made the WRPS.

[Track Changes in red from the section 42A report – Track Changes in black proposed in this evidence]

6.10 As I discussed above the original Future Proof strategy (2009) as reflected in the RPS largely excluded Pokeno since Pokeno was covered by the Franklin Growth Strategy (2007). For this reason, the reference to the original Future Proof, and indeed the RPS, is outdated in respect of Pokeno. A decade has past and in the case of Pokeno a significant portion of the zoned opportunities have or are currently being developed. For Pokeno it would be more appropriate to refer to Future Proof 2017, if any document is referred to. This is particularly the case for the population and land allocation limits set in the RPS, with respect to Pokeno.

6.11 In addition, there is likely to be a need to provide for additional growth and flexibility greater than the levels outlined in Future Proof 2017. This is to reflect the growth pressures associated with Hamilton-Auckland Corridor Plan, the success of the current Pokeno Plan provisions and the influence of Auckland (which includes constraints to growth associated with planning and infrastructure). Depending on the outcome of other strategic planning initiatives or changes in population growth projections and assumptions, greater growth may need to be provided for.

- 6.12 In light of these issues I consider the most appropriate approach is to remove any reference to specific planning documents and population limits. I have proposed some minor text changes to Clause 1.3.4(c) to ensure that introduction to the Urban Growth issue is not tied to specific strategic documents or population limits that may prove to be outdated.
- 6.13 Depending on the outcome of later hearing topics for the PWDP and the status of those other strategic planning processes, there may need to be changes to the Introduction and other parts of the PWDP on this matter also.
- 6.14 Clause 1.3.5 discuss service and general infrastructure:

Services and general infrastructure

- (a) Infrastructure and services are costly to provide, and the cost of their continued maintenance and renewal is generally borne by the community. Development patterns that promote the efficient use of new and existing infrastructure and services ~~across boundaries~~ can contribute significantly to improved cost-effectiveness, to the general health and well-being of communities and help safeguard the environment. Inappropriate subdivision and use and development of land can adversely affect the efficient provision and use of existing and planned subregional and regional infrastructure and services, due to unanticipated demands and reverse sensitivity issues.
- (b) It is important that the district share the provision of core services with neighbouring council service providers, particularly in the north and south. A strategic approach to growth is needed to ensure that infrastructure and services are provided in a timely and economical manner, and that growth establishes patterns of development that will be sustainable over the long term. This may involve sharing of core services with neighbouring council service providers.
- (c) Council's 30-year District Development Strategy, the 10-year Long Term Plan and its associated Financial Strategy and 30-year Infrastructure Strategy, serve to do just this. Growth should be managed in a manner that avoids, remedies or mitigates conflicts or incompatibilities (including reverse sensitivity effects) between new land use and either existing or regionally-planned significant infrastructure. A degree of consistency must be maintained in dealing with the effects of activities which straddle territorial boundaries, such as highways and roads, electricity transmission lines, telecommunication lines, and gas pipelines.
- (d) Additionally, it is desirable that a consistent approach be maintained across boundaries to any necessary constraints on land use adjacent to the infrastructure. The district needs to ensure the protection of regionally and nationally-significant infrastructure, ~~i.e.~~ e.g. road and rail transport corridors, gas and transmission corridors and water infrastructure. It is important that any impacts on regionally-significant infrastructure (e.g. the Waikato Expressway) are addressed. Long-term planning considerations for infrastructure in identified growth areas in the south of the district

need to take into account the outcomes of the Southern Growth Corridor Strategic Land Use and Infrastructure Plan (SLIP).

- (e) In considering cross-boundary issues, Council will encourage consultation between the organisations responsible for the infrastructure, developers, adjoining landowners, and iwi and adjoining consent authorities.
- (f) There are key transmission lines located in the district. The lines are critical for ensuring an efficient and secure supply of electricity throughout the district and beyond. In accordance with the National Policy Statement on Electricity Transmission 2008 and the Regional Policy Statement, the Council is required to manage development to ensure that any ~~third party subdivision, land use~~ and development in the transmission corridor does not affect the ongoing operation, maintenance, upgrading, and development of the lines or result in any incompatibility or reverse sensitivity effects. It is important that Council manages ~~third party activities subdivision, land use and development~~ in the vicinity of these lines as there could be significant impact on the reliability of electricity supply for the whole district and beyond if lines are damaged or their operation or ability to upgrade to meet demand is inappropriately constrained. Waikato District Council will continue to work with its Future Proof Strategy partners, Auckland Council and other infrastructure providers to ensure that growth and development occur in a planned, integrated, and sustainable manner.
- (g) The key benefit of regional collaboration and integration is the ability to reduce the cost of the infrastructure needed to deliver future levels of service and meet demand. (e.g. by making infrastructure provision more efficient) and preserving the efficiency of the road transport network, hence the freight competitiveness of the district. The downside risk associated with any land use control is that tighter controls can deter investment that does not fit the planned settlement patterns either within the Future Proof Strategy subregion or between northern Waikato and southern Auckland.

[As amended by the section 42A report]

6.15 I generally agree with this text and it emphasises how the North Waikato area is linked to the wider Auckland area, along with the balance of the Waikato District.

6.16 Finally, clause 1.3.6 (d) discusses Transport and Logistics:

Transport and logistics

...

- (d) Additional roading capacity and faster travel times will make the district even more 'location-efficient' for productive activities (agriculture, horticulture, and industry) and as a residential and visitor destination. The Council has also developed a district-level integrated transport strategy to guide ongoing integration of land use and transport across the district, which specifically deals with integration needs between the Waikato Expressway and associated networks, and the implications of the revocation of parts of State Highway 1. There is a good rail network for freight, but commuter rail services are non-existent, so Council is advocating

with Auckland Council, Auckland Transport, and the New Zealand Transport Agency for consideration to be given to the extension of passenger rail transport between Pukekohe and Pokeno in the near future. Further discussions will need to be held with KiwiRail. It is important for Auckland Council to work collaboratively with Auckland Transport and other partners (including Waikato Regional Council and Waikato District Council) to explore the most cost-effective and equitable methods providing future public transport services to Tuakau and Pokeno.

[As amended by the section 42A report]

- 6.17 Since the notification of the PWDP, the Waikato Regional Council and the New Zealand Transport Agency has announced plans⁵ for a Hamilton to Auckland rail service, with potential stops at Pokeno⁶ (The Waikato District Council having already secured the Pokeno rail station site through the existing development of Pokeno). On that basis:
- (a) The wording of the provision may need to change to reflect this; and
 - (b) Increased transport choices and connectivity in Pokeno may increase the demand to live in Pokeno, and from a land use and transport integration perspective, a reason to increase residential supply and allow additional capacity above Future Proof 2017.

Mark Tollemache

16 September 2019

⁵ <http://waikatoregion.govt.nz/services/regional-services/transport/rail/>

⁶ <https://www.beehive.govt.nz/release/hamilton-auckland-passenger-rail-trial-gets-green-light>

APPENDIX 1 HVL FURTHER SUBMISSION POINTS

Sub Number	Name	Theme / Submission	Support / Oppose	Reason
81.14	Waikato Regional Council	Amend Chapter 1 to show that the requirements of the 2017 National Policy Statement on Urban Capacity (NPS-UDC) have been considered.	Support	The PWDP must give effect to the National Policy Statement on Urban Capacity (NPS-UDC) but it is not necessary for a planning document to expressly state the NPS-UDC has been considered as this is a statutory requirement.
81.83	Waikato Regional Council	Retain Section 1.4.4 The urban environment, subject to the amendments sought in previous submissions for Policy 4.6.3 to show that the requirements of the 2017 National Policy Statement on Urban Capacity (NPS-UDC) have been considered	Support	The Issues for the Urban Environment are generally appropriate, and the PWDP must give effect to the National Policy Statement on Urban Capacity (NPS-UDC).
81.84	Waikato Regional Council	Retain 1.5.1 Compact urban development, subject to amendments sought in previous submissions for Policy 4.6.3 to show that the requirements of the 2017 National Policy Statement on Urban Capacity (NPS-UDC) have been considered.	Support	The implications of the issues on the compact urban development are generally appropriate, and the PWDP must give effect to the National Policy Statement on Urban Capacity (NPS-UDC).
81.85	Waikato Regional Council	Retain 1.5.2 Planning for urban growth and development, subject to amendments sought in previous submissions for Policy 4.6.3 to show that the requirements of the 2017 National Policy Statement on Urban Capacity (NPS-UDC) have been considered	Support	The implications of the issues on planning for urban growth and development are generally appropriate, and the PWDP must give effect to the National Policy Statement on Urban Capacity (NPS-UDC). HVL supports integrated development and amendments to the PWDP that better achieve that outcome. However, there are a number of different mechanisms that can be included in the PWDP to achieve that outcome including development standards and triggers for release of live zoned residential land or the creation of a future urban zone deferred zone.
81.87	Waikato Regional Council	Retain Section 1.5.4 Urban growth, subject to amendments sought in previous submissions for Policy 4.6.3 to show that the requirements of the 2017 National Policy Statement on Urban Capacity (NPS-UDC) have been considered.	Support in part	The implications of the issues on urban growth are generally appropriate, and the PWDP must give effect to the National Policy Statement on Urban Capacity (NPS-UDC). HVL supports integrated development and amendments to the PWDP that better achieve that outcome. However, there are a number of different mechanisms that can be included in the PWDP to achieve that outcome including development standards and

Sub Number	Name	Theme / Submission	Support / Oppose	Reason
				triggers for release of live zoned residential land or the creation of a future urban zone deferred zone.
367.32	Mercer Community Committee	Retain Section 1.4 Issues for Waikato District.	Support	The identified issues for the Waikato District are generally appropriate subject to drafting.
372.3	Auckland Unitary Council	Amend Section 1.5 to provide for outcomes identified in the Hamilton-Auckland Corridor Plan, Interim Rail Business Case and Future Proof Strategy Phase 2 review AND Amend maps to provide for outcomes identified in the Hamilton - Auckland Corridor Plan, Interim Rail Business Case and Future Proof Strategy Phase 2 review.	Oppose	It is inappropriate to amend the PWDP to reflect non statutory documents that have not yet been completed. Note: The submitter is not pursuing this point.
433.34	Auckland Waikato Fish and Game Council	Amend Section 1.4.4 (a) The Urban Environment as follows; (a) A key issue for the district is to maintain the <u>ecological integrity, natural hydrological characteristics and processes, soil stability, landscape, recreational and amenity values and productive capacity of the rural resource ...</u>	Oppose	HVL supports the notified provisions which adequately identify the purpose of the Urban Environment.
SUBMISSION POINT THAT HAS BEEN PUSHED OUT TO HEARING 3				
697.347	Waikato District Council	Amend the purpose and status of the objectives in Chapter 1 Introduction. AND Add a stand-alone chapter containing all of the strategic objectives	Oppose	HVL supports amendments to improve the readability and clarity of the Plan. But the amendments sought by the submitter are unclear. The PWDP already contains objectives in each chapter so it appears inappropriate and unnecessary to introduce a separate chapter just for objectives.