

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 (PWDP) (Stage 1) (**PWDP**) – Hearing 2 **Topic 2: Plan Structure and All of Plan Matters**

By The Surveying Company Limited (Submitter)

Summary of evidence by Chanel Hargrave on behalf of The Surveying Company Ltd

Dated: October 2019

I have prepared this summary of evidence to address the key points from my Statement of Evidence.

This summary will address the following topics:

- Topic 1: Strategic Direction
- Topic 2: Urban Development and Growth
- Topic 4: Structure
- Topic 4: Zone Purpose

Topic 1: Strategic Direction

The TSC further submission opposed relief sought by a number of submitters to defer or withdraw the Proposed Waikato District Plan. I support the Reporting Officer's recommendation not to withdraw or defer Stage 1 of the PWDP. I also acknowledge my evidence expresses a similar opinion on this topic to Mr Scrafton's evidence prepared on behalf of Tata Valley Limited and I agree with his analysis regarding the age and content of the Waikato District Plan: Franklin Section (WDP: FS) and the pressing need to update and combine the Franklin and Waikato Sections of the Plan.

Natural Hazards

In regards to the reconciliation of Stage 1 and 2 of the PWDP, it is my opinion that the impact of Stage 2 and hazard analysis can be considered through the plan review process. Any hazard issues which require amendments to the Stage 1 provisions can be implemented as a variation to the proposed provisions. This process will allow submitters to submit and be heard. For these reasons I support the Reporting Officer's recommendation not to defer Stage 1 of the PWDP.

Hamilton to Auckland Corridor Plan / Future Proof Stage 2 / Waikato District Blueprint

I also agree with the Reporting Officer's opinion that delaying the PWDP process to await the delivery of the Corridor Plan and the Future Proof Stage 2 is not an efficient or effective outcome. I express that District Plans are not fixed and are constantly reviewed and evolving to reflect and give effect both statutory and non-statutory documents.

Topic 2: Miscellaneous

Urban Development and Growth

TSC are generally supportive of the compact urban growth strategic directive proposed by the PWDP. TSC seek that the PWDP enables housing typologies and densities that encourage intensification around existing Town Centres to ensure that compact urban form can be achieved. In my opinion the PWDP, as it stands, sets a juxtaposition between the strategic directions in Chapter 1.12 of the Plan and the zoning methods and density objectives proposed for the urban environment. The strategic objectives seek to achieve compact urban form, variety of housing, affordable options and less reliance on motor vehicle amongst others¹. The proposed zoning methods apply one residential zone over the majority of the urban residential area. The residential zoning provisions propose a minimum vacant lot size of 450m² and a minimum lot size of 300m² for multi-unit development. In my opinion these standards encourage stand-alone, lower density suburban development patterns and do not give effect to the compact urban form and housing variety strategic outcomes that the Plan seeks to achieve.

The Plans provisions are less intensive than the existing WDP: FS residential zone rules where there is no density standard for multi-unit development, rather any application is assessed against the land use provisions for the zone. A similar method has been implemented in the Auckland Unitary Plan urban and suburban mixed housing zone, to enable flexibility in typologies and encourage intensification in appropriate locations. In my opinion, if compact urban form is to be achieved, the PWDP policy framework and provisions need to encourage intensification in appropriate locations rather than relying

¹ Strategic objectives 1.12.1, 1.12.3, 1.12.4

largely on density of lot size methods. There is opportunity to intensify existing urban areas to achieve medium density where housing stock is older and there is economic viability to re-develop sites. The relief sought by TSC proposes additional policy wording to enable intensification close to Town Centres and amenities as well as the inclusion of an additional medium density residential zone. I acknowledge this will be covered in other hearing topics, however I have broached the topic as it relates to growth and development throughout the district.

Topic 4: Plan Usability

Structure

The TSC submission seeks that the structure of the PWDP is amended to be consistent with the National Planning Standards. The key inconsistency of concern to TSC is the separation of the objectives and policies from the zone and district wide provision chapters. Our preferred relief is that the Plan is restructured prior to becoming operative to ensure legibility of structure and usability. I agree that restructuring the Plan will be challenging, however in my opinion the amendments required by the National Standards should occur concurrently with this process to avoid additional time and costs through a delayed response. Notwithstanding this, TSC accept, as an alternative relief usable cross-referencing between the objectives and policies and the provisions as recommended by the Reporting Officer.

Zone Purpose

The TSC submission sought the inclusion of zone purposes or descriptions within the PWDP. The Reporting Officer's recommendation is to reject the submission as zone purposes are not required by the National Planning Standards. In my opinion the use of descriptions and purposes help to provide context to policies and rules within a Plan. Zone purposes can provide information of the important values or key characteristics of a zone which is helpful to the Plan user. This helps to develop a story within the Plan aiding an understanding of the outcomes sought by the planning framework. The National Planning Standards zones have a basic description which could easily be adopted by Waikato District Council and expanded on to suit the Waikato District context. This relief will assist users in interpreting and understanding the PWDP. In addition this relief would also give more clarity around which zone will be applied when the Plan is restructured to align with the National Planning Standards.

Chanel Hargrave

14/10/2019