

## **Submission on Variation 3 to the Proposed Waikato District Plan (Enabling Housing Supply) by Chief Executive of Waikato District Council**

### **Introduction**

1. This is a submission on Variation 3 to the Proposed Waikato District Plan from Waikato District Council (Council). Council's responsibility includes managing land use activities in the district through the provisions of the district plan and has an interest in achieving a suitable outcome for the future development of the district.
2. Council accepts and supports the role that Waikato District Council (as a Tier 1 territorial authority) must play in enabling housing choice across Aotearoa New Zealand's main urban areas. Council further acknowledges the requirements of the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 in relation to district plan provisions. Notwithstanding the above, the Council submits that there should be greater consideration given to the following aspects:
  - a. The capacity within the three-waters network to accommodate the future growth that would be enabled by Variation 3.
  - b. The urban design outcomes of development and growth enabled by Variation 3.

These matters are addressed in more detail below.

### **Capacity of three-water network**

3. Council has a duty to provide the required three-water infrastructure to support growth across the district. Three water infrastructure has a finite capacity which, at times, can be difficult to ascertain. Council manages new connections to infrastructure, and it is important to ensure that growth is enabled in areas where there is sufficient capacity within the network.
4. Infrastructure within the district has not been specifically planned for the level of intensification that would be enabled by Variation 3.
5. Existing three-water infrastructure has generally latent capacity within the town centres. But there are limitations to understanding growth and managing demand.
6. Council has a duty to meet community requirements for infrastructure service levels.
7. In order for Council to plan and manage for capacity demand in the network, Council needs to:

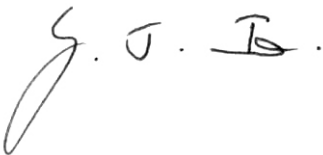
- a. register new connections to the network in order to fully plan and manage three-water infrastructure.
  - b. be able to refuse connections of new dwellings to the existing network in areas that are at capacity.
8. Council considers that the risk associated with potential network capacity constraints provides a degree of uncertainty to developers and the community. Council further considers that this uncertainty could disincentivise residential development across the district and ultimately result in an outcome that is contrary to the Enabling Housing Amendment Act.

### **Urban Design Outcomes**

9. Variation 3 enables substantial intensification of residential areas within the district with relatively minimal required design standards. The resulting outcome of this Variation will result in a significant change of our urban fabric. In addition to enabling housing, Council has a responsibility to provide for the well-being and quality of life of its residents. This includes the ability to interact with the environment and to feel safe and healthy. These broader outcomes can be encompassed by quality urban design. Council considers that there should be an ability to influence the urban design outcomes of the residential areas within the district through the provisions of the district plan.

### **Summary and Further Information**

10. Council considers that additional consideration in relation to three waters infrastructure and future urban design outcomes would support the development of well-functioning urban environments within the Waikato. Council requests that additional consideration be given to these requirements.
11. For clarification of any of the submission points raised in this submission, please contact Keri Davis-Miller phone 07 824 8633 or email [keri.davis-miller@waidc.govt.nz](mailto:keri.davis-miller@waidc.govt.nz) in the first instance.
12. Council wishes to be heard in support of its submission.



Gavin J Ion  
**CHIEF EXECUTIVE**