



# **SUMMARY OF SUBMISSIONS**

**(BY SUBMITTER)**

## **WAIKATO REGIONAL POLICY STATEMENT PROPOSED CHANGE 1 – NATIONAL POLICY STATEMENT ON URBAN DEVELOPMENT 2020 AND FUTURE PROOF STRATEGY UPDATE**

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**Date: 23 January 2023**  
**# 25540870**

# Summary of decisions requested – WRPS Change 1

Submitter	Sub point #	Provision number	Support/oppose	Submission point	Relief sought
Submitter 1: WEL Networks Limited	1.1	UFD-O1 - Built environment	Support in part	<p>WEL supports in part UFD-O1 - Built Environment. However, WEL requests that the objective is amended to ensure that the provision of electricity distribution (WEL's network) is provided in the objective which currently only includes transmission (Transpower's Network).</p> <p>The objective fails to address that the demand for reticulated electricity infrastructure is only going to increase with intensification and more reliance on electric vehicles and small and community scale renewable energy and, consequently, the distribution network.</p>	<p>That Council <b>amends</b> UFD-O1 - Built Environment, as follows:</p> <p>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, by including:</p> <p>...</p> <p>9. Providing for the development, operation, maintenance and upgrading of new and existing electricity <u>distribution</u>, transmission and renewable electricity generation activities including small and community scale generation;</p> <p>...</p>
Submitter 1: WEL Networks Limited	1.2	UFD-P12 - Density targets for Future Proof area	Not stated	<p>WEL requests that a new sentence be included under point 9 which ensures that development does not compromise the safe, efficient and effective operation of electricity infrastructure.</p> <p>Through the intensification of the Waikato Region and the reduction of setbacks from the transport corridor, there is potential for future development to be located in positions which may breach the New Zealand Electrical Code of 34:2001.</p>	<p>That Council <b>includes</b> a new sentence under Point 9, as follows:</p> <p>Future Proof territorial authorities shall seek to achieve compact urban environments that:</p> <p>...</p> <p><u>Provided that development does not compromise the safe, efficient and effective operation of electricity infrastructure.</u></p>
Submitter 1: WEL Networks Limited	1.3	UFD-PR11 - Adopting Future Proof land use pattern	Support in part	<p>WEL supports in part UFD-PR11 – Adopting Future Proof land use pattern. However, WEL requests that the principal reason is amended to include Network Utility Operators.</p> <p>The principal reason fails to address that the demand for reticulated electricity infrastructure is only going to increase with intensification and more reliance on electric</p>	<p>That Council amends UFD-PR11 – Adopting Future Proof land use pattern, as follows:</p> <p><b>UFD-PR11 – Adopting Future Proof land use pattern</b></p> <p>...</p> <p>UFD-M48 recognises that to achieve the Future Proof land use pattern, sufficient land needs to be zoned for</p>

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				vehicles and small and community scale renewable energy and, consequently, the distribution network.	development and that appropriate provisions need to be made for servicing this development. Councils and other infrastructure providers, such as New Zealand Transport Agency and Network Utility Operators, will have a role in the timely provision of infrastructure. ...
<b>Submitter 1:</b> WEL Networks Limited	1.4	APP13 - Responsive Planning Criteria - Out of sequence and Unanticipated Developments (Future Proof local authorities)	Support in part	WEL supports in part Point I and J of Criteria A which seeks to ensure that development does not compromise infrastructure and committed infrastructure investments.  WEL requests that the policy is amended to include regionally significant infrastructure which would include the electricity distribution network.	That Council amends Point I and J of Criteria A, as follows:  <b>Criteria A</b> ... I. That the development does not compromise the efficiency, affordability or benefits of existing and/or proposed <u>regionally significant</u> infrastructure in the sub-region. ... J. That the development can be serviced without undermining committed infrastructure investments made by <u>network utilities or local authorities</u> or central government (including NZ Transport Agency). Development must be shown to be adequately serviced without undermining committed infrastructure investments made by <u>network utilities or local authorities</u> or central government to support other growth areas. ...
<b>Submitter 2:</b> Horticulture New Zealand (HortNZ)	2.1	1.6 Definitions	Neutral	New definition - <u>Highly Productive Land</u> .  To align with the National Policy Statement Highly Productive Land.	Include definition of highly productive land from the National Policy Statement Highly Productive Land.
<b>Submitter 2:</b> Horticulture New Zealand (HortNZ)	2.2	1.6 Definitions	Oppose	HortNZ strongly opposes the distinction made to separate LUC 1 (within wāhi toitū) from LUC 2 and 3 (wāhi toitū) and to then apply a different planning response and criteria to each for the purposes of directing growth management.	Delete definition of high class soils and include definition of highly productive land consistent with National Policy Statement Highly Productive Land

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<b>Submitter 2:</b> Horticulture New Zealand (HortNZ)	2.3	SRMR-I4 - Managing the Built Environment	Support in part	Amendments to SRMR-I4 do not give effect to the National Policy Statement for Highly productive Land.	Amend to identify what local authorities must do to give effect to the objectives and policies of the National Policy Statement for Highly productive Land.
<b>Submitter 2:</b> Horticulture New Zealand (HortNZ)	2.4	SRMR-PR4 - Managing the Built Environment	Oppose in part	Amendments to SRMR-PR4 do not give effect to the National Policy Statement for Highly Productive Land.	Amend to identify what local authorities must do to give effect to the objectives and policies of the National Policy Statement for Highly Productive Land .
<b>Submitter 2:</b> Horticulture New Zealand (HortNZ)	2.5	IM-O1 - Integrated Management	Oppose in part	Amendments to IM-O1 do not give effect to the National Policy Statement for Highly Productive Land.	Amend IM-O1 to be consistent with and reference to s3.2 of the National Policy Statement for Highly Productive Land
<b>Submitter 2:</b> Horticulture New Zealand (HortNZ)	2.6	UFD-O1 - Built Environment	Oppose in part	Amendments to UFD-O1 do not give effect to the National Policy Statement for Highly Productive Land.	Amend to identify what local authorities must do to give effect to the objectives and policies of the National Policy Statement for Highly Productive Land.
<b>Submitter 2:</b> Horticulture New Zealand (HortNZ)	2.7	UFD-P2 - Built Environment	Oppose in part	Amendments to UFD-O1 do not give effect to the National Policy Statement for Highly Productive Land.	Amend IM-O1 to be consistent with and reference to s3.2 of the National Policy Statement for Highly Productive Land.
<b>Submitter 2:</b> Horticulture New Zealand (HortNZ)	2.8	UFD-P14 - Rural-Residential Development in Future Proof Areas	Oppose in part	Amendments to UFD-P14 do not give effect to the National Policy Statement for Highly productive Land.	Amend UFD-P14 to be consistent with Policy 6 and s3.7 of the National Policy Statement for Highly productive Land.
<b>Submitter 2:</b> Horticulture New Zealand (HortNZ)	2.9	UFD-P18 - Tier 3 Local Authority Areas Outside the Future Proof Strategy	Oppose in part	HortNZ strongly opposes the distinction made to separate LUC 1 (within wāhi toitū) from LUC 2 and 3 (wāhi toitū) and to then apply a different planning response and criteria to each for the purposes of directing growth management.	Amend to identify that urban zoning, rural lifestyle rezoning and development and subdivision of Highly Productive Land is to be avoided except as provided in the National Policy Statement for Highly Productive Land
<b>Submitter 2:</b> Horticulture New Zealand (HortNZ)	2.10	UFD-P19 - Being Responsive to Significant Unintended and	Oppose in part	HortNZ strongly opposes the distinction made to separate LUC 1 (within wāhi toitū) from LUC 2 and 3 (wāhi toitū) and to then apply a different planning response and criteria to each for the purposes of directing growth management.	Amend to identify that urban zoning, rural lifestyle rezoning and development and subdivision of Highly Productive Land is to be avoided except as provided in the National Policy Statement for Highly Productive Land.

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		Out-of-Sequence Growth Within Tier 3 Local Environments			
<b>Submitter 2:</b> Horticulture New Zealand (HortNZ)	2.11	UFD-M5 - District plan provisions for rural-residential development	Oppose in part	The WRPS, Proposed Change 1 and the UFD-M5 does not give effect to the National Policy Statement for Highly Productive Land 2022.	Amend UFD-M5 to give effect to Policy 6-7 and s3.7-3.8 of the National Policy Statement for Highly Productive Land concerning rural lifestyle activity.
<b>Submitter 2:</b> Horticulture New Zealand (HortNZ)	2.12	UFD-M8 Information to Support New Urban Development and Subdivision	Oppose in part	The WRPS, Proposed Change 1 and the UFD-M8 do not give effect to the National Policy Statement for Highly Productive Land 2022.	Add information requirements to require analysis of the spatial arrangement of Highly Productive Land and how a proposal gives effect to the National Policy Statement for Highly Productive Land.
<b>Submitter 2:</b> Horticulture New Zealand (HortNZ)	2.13	UFD-M49 - Out-of-Sequence or Unanticipated Urban Growth	Oppose in part	The WRPS, Proposed Change 1 and the UFD-M49 do not give effect to the National Policy Statement for Highly Productive Land 2022.	Add criteria to set out the requirements of district plans and structure plans in regard to the National Policy Statement for Highly Productive Land.
<b>Submitter 2:</b> Horticulture New Zealand (HortNZ)	2.14	UFD-M55 - District plan provisions and growth strategies managing rural residential development in the Future Proof area	Oppose in part	The WRPS, Proposed Change 1 and the UFD-M55 do not give effect to the National Policy Statement for Highly Productive Land 2022.	Amend UFD-M55 to give effect to Policy 6-7 and s3.7-3.8 of the National Policy Statement for Highly Productive Land concerning rural lifestyle activity.
<b>Submitter 2:</b> Horticulture New Zealand (HortNZ)	2.15	UFD-M56 - Rural-residential development	Oppose in part	The WRPS, Proposed Change 1 and the UFD-M56 do not give effect to the National Policy Statement for Highly Productive Land 2022.	Amend UFD-M56 to give effect to Policy 6-7 and s3.7-3.8 of the National Policy Statement for Highly Productive Land concerning rural lifestyle activity.

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		around Hamilton			
<b>Submitter 2:</b> Horticulture New Zealand (HortNZ)	2.16	UFD-M57 - Directing development to rural-residential zones in the Future Proof area	Oppose in part	The WRPS, Proposed Change 1 and the UFD-M57 do not give effect to the National Policy Statement for Highly Productive Land 2022.	Amend UFD-M55 to give effect to Policy 6-7 and s3.7-3.8 of the National Policy Statement for Highly Productive Land concerning rural lifestyle activity.
<b>Submitter 2:</b> Horticulture New Zealand (HortNZ)	2.17	UFD-M69 - Council-approved growth strategy or equivalent in tier 3 local authority areas	Oppose in part	The WRPS and Proposed Change 1 do not give effect to the National Policy Statement for Highly Productive Land 2022.	Amend the criteria to identify what local authorities must do to give effect to the objectives and policies of the National Policy Statement for Highly Productive Land
<b>Submitter</b> Horticulture New Zealand (HortNZ)	2.18	UFD-M74 - Tier 3 out-of-sequence or unanticipated developments	Oppose in part	The WRPS and Proposed Change 1 do not give effect to the National Policy Statement for Highly Productive Land 2022.	Amend the criteria to identify the things local authorities must do to give effect to the objectives and policies of the National Policy Statement for Highly Productive Land
<b>Submitter 2:</b> Horticulture New Zealand (HortNZ)	2.19	UFD-PR1 - Planned and co-ordinated subdivision, use and development	Oppose in part	The WRPS and Proposed Change 1 do not give effect to the National Policy Statement for Highly Productive Land 2022.	Amend UFD-PR1 to identify what local authorities must do to give effect to the objectives and policies of the National Policy Statement for Highly Productive Land
<b>Submitter 2:</b> Horticulture New Zealand (HortNZ)	2.20	UFD-PR11 - Adopting Future Proof land pattern	Oppose in part	Future urban and village enablement areas are identified on Map 43 before appeals on the Waikato District Plan that may affect the location and spatial extent of these areas.	Await resolution of appeals on the Waikato District Plan before confirming Future urban and village enablement areas.
<b>Submitter 2</b> Horticulture	2.21	UFD-PR14 - Rural-residential development in	Oppose in part	Amendments to UFD-PR14 do not give effect to the National Policy Statement for Highly Productive Land.	Amend UFD-PR14 to be consistent with Policy 6 and s3.7 of the National Policy Statement for Highly Productive Land.

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New Zealand (HortNZ)		Future Proof area			
<b>Submitter 2:</b> Horticulture New Zealand (HortNZ)	2.22	UFD-PR18 Tier 3 Local authority areas outside the Future Proof Strategy	Oppose in part	HortNZ strongly opposes the distinction made to separate LUC 1 (within wāhi toitū) from LUC 2 and 3 (wāhi toitū) and to then apply a different planning response and criteria to each for the purposes of directing growth management.	Amend to identify that urban zoning, rural lifestyle rezoning and development and subdivision of Highly Productive Land is to be avoided except as provided in the National Policy Statement for Highly Productive Land.
<b>Submitter 2:</b> Horticulture New Zealand (HortNZ)	2.23	UFD-PR19 Being Responsive to Significant Unintended and Out-of-Sequence Growth Within Tier 3 Local Environments	Oppose in part	HortNZ strongly opposes the distinction made to separate LUC 1 (within wāhi toitū) from LUC 2 and 3 (wāhi toitū) and to then apply a different planning response and criteria to each for the purposes of directing growth management.	Amend to identify that urban zoning, rural lifestyle rezoning and development and subdivision of Highly Productive Land is to be avoided except as provided in the National Policy Statement for Highly Productive Land.
<b>Submitter 2:</b> Horticulture New Zealand (HortNZ)	2.24	UFD-M New	Not stated	The WRPS, Proposed Change 1 and the UFD-M49 do not give effect to the National Policy Statement for Highly Productive Land 2022.	Add new method requiring territorial authorities to give effect to Policy 9 and s3.13 of the National Policy Statement for Highly Productive Land concerning managing reverse sensitivity and cumulative effects.
<b>Submitter 2:</b> Horticulture New Zealand (HortNZ)	2.25	APP11 - Development Principles	Oppose in part	The WRPS, Proposed Change 1 and the Development Principles set out in APP11 do not give effect to the National Policy Statement for Highly Productive Land 2022.	Amend General Development Principles as follows:  h) be directed away from identified significant mineral resources and their access routes, natural hazard areas, energy and transmission corridors, locations identified as likely renewable energy generation sites and their associated energy resources, regionally significant industry, <del>high class soils, and primary production activities on those high class soils;</del>  ) <u>The urban zoning of highly productive land is avoided, except as provided in the National Policy Statement for Highly Productive Land.</u>

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					Amend <b>Principles Specific to Rural-Residential Development</b> as follows:  ) <u>The rezoning and development of highly productive land as rural lifestyle is avoided, except as provided for in the National Policy Statement for Highly Productive Land.</u>
<b>Submitter 2:</b> Horticulture New Zealand (HortNZ)	2.26	APP13 - Responsive Planning Criteria - Out-of-Sequence and Unanticipated Developments (Future Proof Local Authorities)	Oppose in part	The WRPS, Proposed Change 1 and APP13 do not give effect to the National Policy Statement for Highly Productive Land 2022.	Add new Criteria A as follows:  <u>That the development avoids areas identified as Highly Productive Land (LUC 1, 2, and 3) on Map 44.</u>
<b>Submitter 2:</b> Horticulture New Zealand (HortNZ)	2.27	APP14 - Responsive Planning Criteria - Out-of-Sequence and Unanticipated Developments (Non-Future Proof Tier 3 Local Authorities)	Oppose in part	The WRPS, Proposed Change 1 and APP14 do not give effect to the National Policy Statement for Highly Productive Land 2022.	Add new Criteria as follows:  <u>That the development avoids areas identified as Highly Productive Land (LUC 1, 2, and 3) on Map 44.</u>
<b>Submitter 2:</b> Horticulture New Zealand (HortNZ)	2.28	Map 43 Future proof indicative urban and village enablement areas	Oppose in part	Future urban and village enablement areas are identified on Map 6-2 in the Waikato District, before appeals on the Waikato District Plan that may affect the location and spatial extent of these areas.	Await resolution of appeals on the Waikato District Plan before confirming Future urban and village enablement areas.

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Submitter 3: Tainui Group Holdings Limited	3.1	UFD-O1 Built Environment	Support	<p>Objective UFD-O1 as amended in clause 12 recognises that well-functioning urban environments “enable a variety of homes that enable Māori to express their cultural traditions and norms” and “take into account the values and aspirations of hapū and iwi for urban development”.</p> <p>Tainui Group Holdings Limited is the kaitiaki of the commercial interests of Waikato-Tainui, with a focus on growing puutea, tuuranga mahi and whenua – profit, jobs and land – for the people of Waikato Tainui, the region and for generations to come.</p> <p>The proposed amendments recognise the importance for hapuu and iwi to develop their land resources for their economic, social and cultural betterment.</p>	Retain as notified.
Submitter 3: Tainui Group Holdings Limited	3.2	UFD-P11 - Adopting Future Proof land use pattern	Support	<p>Policy UFD-P11 clause 1 specifies that new urban development occurs within the Urban and Village Enablement Areas Limits indicated on Map 43.</p> <p>Map 43 reflects the current and urban areas shown on Map 6 of the Future Proof Strategy 2022 which Tainui Group Holdings Limited has partnered on.</p> <p>Map 43 correctly includes the land east of the WEX as a future urban area, identified as a strategic industrial node within the short-medium term development timeframe. This land is immediately accessible from the Ruakura Interchange and its size, location and favourable topography means that it will function as part of the Ruakura Superhub.</p> <p>Map 43 also correctly shows the shows the Tuumata (formerly known as “Tramway”) block for development within the short-medium term development timeframe, that land currently being promoted for medium density</p>	Retain as notified.

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				residential development by way of a private plan change by TGH, in accordance with the Metro Spatial Plan.	
<b>Submitter 3:</b> Tainui Group Holdings Limited	3.3	UFD-P11 - Adopting Future Proof land use pattern; Clause 2/Map 43	Support	<p>Policy UFD-P11 Clause 2 requires that new residential (including rural-residential) development shall be managed in accordance with the timing indicated on Map 43.</p> <p>Map 43 aligns with the anticipated development timing of TGH’s land holdings where residential is proposed, and is supported.</p>	Retain as notified.
<b>Submitter 3:</b> Tainui Group Holdings Limited	3.4	UFD-P11 - Adopting Future Proof land use pattern	Support in part	<p>Policy UFD-P11 Clause 3 requires that new industrial development should predominantly be located in the strategic industrial nodes in Table 35 (APP12) and in accordance with the indicative timings in that table.</p> <p>The Ruakura figures are based on the amount of land provided for industrial use at Ruakura, based on TGH planning and infrastructure assumptions.</p> <p>The reference to “Ruakura East” in the table is supported, for the same reasons as set out above under Policy UFD-P11 Clause 1.</p> <p>The table would benefit with some amendments to provide better clarity as detailed below. Firstly “Ruakura East” lacks specificity and would better be expressed as “Ruakura East WEX” in the table and the Explanation clauses.</p> <p>Secondly, the explanation to the table for “Ruakura/Ruakura East” states that the “<i>the land identified in Table 35 is based on the amount of land provided for industrial use at Ruakura, excluding the residential master-plan area and Agricultural Research Campus</i>”. This exclusion is intended to mean the Tuumata Residential block (formerly Tramway) discussed above in this submission, which is identified in various strategic</p>	<p>Retain Policy UFD-P11 Clause 3 and Table 35, subject to the following amendments to Table 35:</p> <ol style="list-style-type: none"> <li>1. Amend the table and explanation as follows: “Ruakura/Ruakura East <u>WEX</u>”.</li> <li>2. Amend the explanation to the table as follows: “Ruakura/Ruakura East <u>WEX</u> The land identified in Table 35 is based on the amount of land provided for industrial use at Ruakura, excluding the residential master-planned area at <u>Tuumata</u> and <u>the Agricultural Research Campus</u>”.</li> <li>3. Such other consequential or alternative relief to give effect to this submission.</li> </ol>

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				documents and currently being promoted by TGH for residential development by way of private plan change. The explanation should more directly reference this block to avoid any ambiguity.	
<b>Submitter 3:</b> Tainui Group Holdings Limited	3.5	UFD-P12 - Density targets for Future Proof area	Support	<p>The net target density sought for Ruakura of 35-55 dwellings per ha is consistent with the Future Proof Strategy and is supported.</p> <p>In its planning for the Tuumata residential development, TGH has tested appropriate densities that would be consistent with the Medium Density Residential Standards from the RMA 1991, and a density range between 35-55 dwellings per ha is consistent with that, taking into account residential development that has already occurred elsewhere in the Ruakura Structure Plan area.</p> <p>A new neighbourhood centre is also proposed at Tuumata. The requirement of this policy that adjacent to neighbourhood centre zones, building heights and density of urban form should be enabled, commensurate with the level of commercial activities and community services unless modified to accommodate a qualifying matter is consistent with the NPS UD and is supported.</p>	Retain as notified.
<b>Submitter 3:</b> Tainui Group Holdings Limited	3.6	UFD-M48 - Land Release in the Future Proof area	Support	Method UFD-M48 states that Hamilton City Council, Waipā District Council and Waikato District Council shall ensure land is zoned and Hamilton City Council, Waipā District Council, Waikato District Council, Waikato Regional Council, the New Zealand Transport Agency and other relevant government agencies should ensure that land is appropriately serviced, in accordance with UFDP11, Map 43 (or in accordance with any revised timing as set out in UFD-P11 (2)) and Table 35.	Retain as notified.

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				For the same reasons that UFD-P11 Map 43 and Table 35 are supported (subject to amendments) this method is also supported.	
<b>Submitter 4:</b> South Waikato District Council	1	UFD-P18 - Tier 3 local authority areas outside the Future Proof Strategy	Support in part	<p>Council supports the provision as it provides for the future, interim measures as well as providing the opportunity to being responsive to significant unintended and out-of-sequence growth within tier 3 environments.</p> <p>Of concern is the release of the Spatial Planning Bill as well as the Natural and Built Environment Bill. As part of the Spatial Planning Bill, Regional Spatial Strategies are identified as being strategic level documents that identify where development, growth and infrastructure should be provided, as well as areas to be protected or that are vulnerable to climate change effects and natural hazards. These will also take into account the National Planning Framework (being based on existing National Policy Statements and no doubt other issues) and would provide direction for the Natural and Built Environment Plans.</p> <p>The Growth Strategies developed under this plan change should be recognised for the development of future Regional Spatial Strategies and the Natural and Built Environment Plans.</p>	<p>1. Council supports the UFD-P18 as follows subject to any specific amendments identified in this submission.</p> <p>2. To insert within the plan change with reference to Tier 3 authorities that any Growth Strategies developed under UFD-P18 be recognised for future Regional Growth Strategies and the Natural and Built Environment Plan.</p>
<b>Submitter 4:</b> South Waikato District Council	2	UFD-P19 - Being responsive to significant unintended and out-of-sequence growth within tier 3 local environments	Support in part	<p>Council supports the provision as it provides for the future, interim measures as well as providing the opportunity to being responsive to significant unintended and out-of-sequence growth within tier 3 environments.</p> <p>The Growth Strategies developed under this plan change should be recognised for the development of future Regional Spatial Strategies and the Natural and Built Environment Plans.</p>	<p>1. Council supports UFD-P19 subject to any specific amendments identified in this submission.</p> <p>2. Insert wording with reference to Tier 3 authorities that any Growth Strategies developed under UFD-P19 be recognised for future Regional Growth Strategies and the Natural and Built Environment Plan.</p>
<b>Submitter 4:</b>	3	UFD-M69 - Council	Support in part	Council supports the provision as it provides for the future, interim measures as well as providing the opportunity to	1. Council supports the UFD-M69 as follows subject to any specific amendments identified in this submission.

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South Waikato District Council		approved growth strategy or equivalent in tier 3 local authority areas		being responsive to significant unintended and out-of-sequence growth within tier 3 environments.  The Growth Strategies developed under this plan change should be recognised for the development of future Regional Spatial Strategies and the Natural and Built Environment Plans.	2. Insert wording with reference to Tier 3 authorities that any Growth Strategies developed under UFD-M69 be recognised for future Regional Growth Strategies and the Natural and Built Environment Plan.
<b>Submitter 4:</b> South Waikato District Council	4	UFD-M70 - District Plans	Support in part	Council supports the provision as it provides for the future, interim measures as well as providing the opportunity to being responsive to significant unintended and out-of-sequence growth within tier 3 environments.  The Growth Strategies developed under this plan change should be recognised for the development of future Regional Spatial Strategies and the Natural and Built Environment Plans.	1. Council supports the UFD-M70 as follows subject to any specific amendments identified in this submission. 2. Insert wording with reference to Tier 3 authorities that any Growth Strategies developed under UFD-M70 be recognised for future Regional Growth Strategies and the Natural and Built Environment Plan.
<b>Submitter 4:</b> South Waikato District Council	5	UFD-M71 Housing Affordability	Support in part	Council supports the provision as it provides for the future, interim measures as well as providing the opportunity to being responsive to significant unintended and out-of-sequence growth within tier 3 environments.  The Growth Strategies developed under this plan change should be recognised for the development of future Regional Spatial Strategies and the Natural and Built Environment Plans.	1. Council supports the UFD-M71 as follows subject to any specific amendments identified in this submission. 2. Insert wording with reference to Tier 3 authorities that any Growth Strategies developed under UFD-M71 be recognised for future Regional Growth Strategies and the Natural and Built Environment Plan.
<b>Submitter 4:</b> South Waikato District Council	6	UFD-M72 - Interim arrangements	Support in part	Council supports the provision as it provides for the future, interim measures as well as providing the opportunity to being responsive to significant unintended and out-of-sequence growth within tier 3 environments.  The Growth Strategies developed under this plan change should be recognised for the development of future Regional Spatial Strategies and the Natural and Built Environment Plans.	1. Council supports the UFD-M72 as follows subject to any specific amendments identified in this submission. 2. Insert wording with reference to Tier 3 authorities that any Growth Strategies developed under UFD-M72 be recognised for future Regional Growth Strategies and the Natural and Built Environment Plan.

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Submitter 4: South Waikato District Council	7	UFD-M74 - Tier 3 out of sequence or unanticipated developments	Support in part	<p>Council supports the provision as it provides for the future, interim measures as well as providing the opportunity to being responsive to significant unintended and out-of-sequence growth within tier 3 environments.</p> <p>The Growth Strategies developed under this plan change should be recognised for the development of future Regional Spatial Strategies and the Natural and Built Environment Plans.</p>	<p>1. Council supports the UFD-M74 as follows subject to any specific amendments identified in this submission.</p> <p>2. Insert wording with reference to Tier 3 authorities that any Growth Strategies developed under UFD-M74 be recognised for future Regional Growth Strategies and the Natural and Built Environment Plan.</p>
Submitter 4: South Waikato District Council	8	UFD-O1 - Built Environment	Support in part	<p>The objective requires <i>“strategically planning for growth and development to create responsive and well-functioning urban environments, that:</i></p> <p>-----</p> <p><i>e. improves connectivity within urban areas, particularly by active transport and public transport</i></p> <p>-----.</p> <p>To require public transport to be included is unreasonable for smaller towns throughout the Region, particularly as public transport within these towns is virtually non-existent. In most instances the towns only have public transport to and from the larger cities.</p>	<p>Reword 2. UFD-O1-12e to the following or similar:</p> <p>e. improves connectivity within urban areas, particularly by active transport and <u>where possible</u> public transport</p>
Submitter 4: South Waikato District Council	9	APP-14 - Responsive Planning Criteria - Out of sequence and Unanticipated Developments (Non- Future Proof tier 3 local authorities)	Support in part	<p>All the criteria are supported except for L. which requires <i>“That the development would contribute to mode-shift towards public and active transport”</i></p> <p>To require public transport to be included is unreasonable for smaller towns throughout the Region, particularly as public transport within these towns is virtually non-existent. In most instances the town’s only have public transport to and from the larger cities.</p> <p>Whilst there is no disagreement to contribute to mode-shift towards active transport, it is unknown what the expectations are towards providing for the shift in public</p>	<p>Reword APP-14-L. to make it clear what the expectation for public transport is when development occurs in a town where no, <u>or limited</u> public transport exists within the town.</p>

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				<p>transport. Does this mean having a suitable roading pattern to ensure connectivity exists?</p> <p>Therefore to make this clear it is submitted that the clause L. be written in a manner to make it clear what the expectations for public transport are.</p>	
Submitter 4: South Waikato District Council	10	General	Support in part	<p>Within UFD-P19 'structure plans' are identified. Under the National Planning Standards these are now called 'Development Areas'. These are defined as being:</p> <p><i>"A development area spatially identifies and manages areas where plans such as concept plans, structure plans, outline development plans, master plans or growth area plans apply to determine future land use or development. When the associated development is complete, the development area spatial layer is generally removed from the plan either through a trigger in the development area provisions or at a later plan change"</i></p> <p>Council submits that consistency be applied using the terminology in the National Planning Standards.</p>	Reword by replacing the term 'structure plan' with 'Development Area Plans' within the plan change.
Submitter 5: Waikato Regional Council	5.1	1.6 Definitions	Support in part	<p>The National Policy Statement for Highly Productive Land commenced on 17 October 2022. The definition of highly productive land should be inserted and references to high class soils be replaced with highly productive land (see points below).</p>	<p>Insert new definition: <b>Highly productive land</b> Has the same meaning as in Part 1 of the National Policy Statement for Highly Productive Land 2022 (as set out in the box below)</p> <p><u>Means land that has been mapped in accordance with clause 3.4 and is included in a regional policy statement as required by clause 3.5 (but see clause 3.5(7) for what is treated as highly productive land before the maps are included in an operative regional policy statement and clause 3.5(6) for when land is rezoned and therefore ceased to be highly productive land).</u></p>

Submitter	Sub point #	Provision number	Support/oppose	Submission point	Relief sought
<b>Submitter 5:</b> Waikato Regional Council	5.2	1.6 Definitions	Support in part	Other definitions in the WRPS that are from the National Policy Statement on Urban Development include a box with the definition from the National Policy Statement. The definition of “Tier 1 local authority” does not. This definition should be included for consistency.	Amend as follows: <b>Tier 1 local authority</b> Has the same meaning as in Part 1 of the National Policy Statement on Urban Development 2020 ( <u>as set out in the box below</u> )  <u>Means each local authority listed in column 2 of table 1 in the Appendix, and tier 1 regional council and tier 1 territorial authority have corresponding meanings</u>
<b>Submitter 5:</b> Waikato Regional Council	5.3	1.9.4 Waikato Regional Policy Statement	Support in part	The reference to “clauses” introduced by the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 is incorrect and should be amended to “sections” to reflect that the Amendment Act has been made and is in force as part of the Resource Management Act 1991.	Amend as follows: <i>Clauses Sections 771 and 770</i> of the Resource Management Act 1991 as introduced by the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 specify that giving effect to Te Ture Whaimana o te Awa o Waikato – the Vision and Strategy for the Waikato River is a qualifying matter in relation to applying the medium density residential standards and Policy 3 of the National Policy Statement on Urban Development 2020 (as amended May 2022). This means that plan provisions can be less enabling of urban development than required under the Act or the National Policy Statement on Urban Development 2020 where necessary to accommodate a matter to give effect to Te Ture Whaimana.
<b>Submitter 5:</b> Waikato Regional Council	5.4	1.10 - National Policy Statements and New Zealand Coastal Policy Statement	Support in part	The National Policy Statement for Highly Productive Land commenced on 17 October 2022. This should be listed as a National Policy Statement in the table.	Include reference to the National Policy Statement for Highly Productive Land 2022.
<b>Submitter 5:</b> Waikato Regional Council	5.5	UFD-P11 - Adopting Future Proof land use pattern	Support in part	There is an extra bracket at the end of clause 2.	Remove the extra bracket from the end of clause 2: ...in accordance with the National Policy Statement on Urban Development 2020 };

Submitter	Sub point #	Provision number	Support/oppose	Submission point	Relief sought
Submitter 5: Waikato Regional Council	5.6	UFD-P14 - Rural-residential in the Future Proof area	Support in part	The National Policy Statement for Highly Productive Land commenced on 17 October 2022. Policy 6 of the National Policy Statement states that the rezoning and development of highly productive land for rural lifestyle is to be avoided except as provided for in the policy statement. This policy should be updated to reflect this.	Insert new provision as follows and renumber subsequent provisions: 1. <u>Avoid rezoning or developing highly productive land for rural lifestyle except as provided for in the National Policy Statement for Highly Productive Land 2022.</u>
Submitter 5: Waikato Regional Council	5.7	UFD-P18 - Tier 3 local authority areas outside the Future Proof Strategy	Support in part	The National Policy Statement for Highly Productive Land commenced on 17 October 2022. This provision should be amended to reflect this higher order document.	Amend as follows: 8. recognises environmental attributes or constraints to development and addresses how they will be avoided or managed including those specifically identified in UFD-M8, highly productive land as required by the National Policy Statement on Highly Productive Land 2022 as identified in <del>LF-M41</del> , and planning in the coastal environment as set out in CE-M1;
Submitter 5: Waikato Regional Council	5.8	UFD-M8 - Information to support new urban development and subdivision	Support in part	The National Policy Statement for Highly Productive Land commenced on 17 October 2022. This provision should be amended to reflect this higher order document and to recognise that the highly productive land definition is wider in scope than the WRPS definition of high class soils.	Amend as follows: 4. how existing values, and valued features of the area (including amenity, landscape, natural character, ecological and heritage values, water bodies, highly productive land <del>high class soils</del> and significant view catchments) will be managed;
Submitter 5: Waikato Regional Council	5.9	UFD-M49 - Out-of-sequence or unanticipated urban development	Support in part	The National Policy Statement for Highly Productive Land commenced on 17 October 2022. This provision should be amended to reflect this higher order document to ensure that it is appropriately considered in applications for out-of-sequence or unanticipated urban development.	Insert new provision as follows and renumber subsequent provisions: 1. <u>The land is not highly productive land, or if it is highly productive land:</u> a. <u>The urban zoning is required to provide sufficient development capacity to meet demand for housing or business land to give effect to the National Planning Statement on Urban Development 2020; and</u> b. <u>There are no other reasonably practical and feasible options for providing at least sufficient development capacity within the same locality and market while achieving a well-functioning urban environment; and</u> c. <u>The environmental, social, cultural and economic benefits of rezoning outweigh the long-term environmental, social, cultural and economic costs</u>

Submitter	Sub point #	Provision number	Support/oppose	Submission point	Relief sought
					associated with the loss of highly productive land for land-based primary production, taking into account both tangible and intangible values.
<b>Submitter 5:</b> Waikato Regional Council	5.10	UFD-M74 - Tier 3 out-of-sequence or unanticipated development	Support in part	The National Policy Statement for Highly Productive Land commenced on 17 October 2022. This provision should be amended to reflect this higher order document to ensure that it is appropriately considered in applications for out-of-sequence or unanticipated urban development.	Insert new provision as follows and renumber subsequent provisions: 1. The land is not highly productive land, or if it is highly productive land: a. The urban zoning is required to provide sufficient development capacity to meet expected demand for housing and business land in the district; and b. There are no other reasonably practical and feasible options for providing the required development capacity; and c. The environmental, social, cultural and economic benefits of rezoning outweigh the long-term environmental, social, cultural and economic costs associated with the loss of highly productive land for land-based primary production, taking into account both tangible and intangible values.
<b>Submitter 5:</b> Waikato Regional Council	5.11	UFD-PR1 - Planned and co-ordinated subdivision, use and development	Support in part	The National Policy Statement for Highly Productive Land commenced on 17 October 2022. This provision should be amended to reflect this higher order document and to recognise that the highly productive land definition is wider in scope than the WRPS definition of high class soils	Amend paragraph 6: UFD-M5 provides direction for managing rural-residential development. Rural-residential development in some cases has created effects such as reducing options for use of <del>high class soils</del> highly productive land, increasing pressure on roading systems, increasing potential for natural hazards and creating tensions between existing rural land uses [...]
<b>Submitter 5:</b> Waikato Regional Council	5.12	UFD-PR18 - Tier 3 local authority areas outside the Future Proof Strategy	Support in part	The National Policy Statement for Highly Productive Land commenced on 17 October 2022. This provision should be amended to reflect this higher order document and to recognise that the highly productive land definition is wider in scope than the WRPS definition of high class soils.	Amend paragraph 3: Clause (9) provides specific direction for urban environments [...] Other benefits of this approach include reducing the need for future transport infrastructure development, improving efficient use of waters infrastructure, and reducing urban sprawl onto <del>high class soils</del> highly productive land.

Submitter	Sub point #	Provision number	Support/oppose	Submission point	Relief sought
Submitter 5: Waikato Regional Council	5.13	UFD-AER8 - Anticipated Environmental Results	Support in part	The National Policy Statement for Highly Productive Land commenced on 17 October 2022. This provision should be amended to reflect this higher order document and to recognise that the highly productive land definition is wider in scope than the WRPS definition of high class soils.	Amend: Fragmentation of <del>high class soils</del> <u>highly productive land</u> is reduced.
Submitter 5: Waikato Regional Council	5.14	APP11 - Development principles	Support in part	The National Policy Statement for Highly Productive Land commenced on 17 October 2022. This provision should be amended to reflect this higher order document and to recognise that the highly productive land definition is wider in scope than the WRPS definition of high class soils.	Amend: h) be directed away from identified significant mineral resources and their access routes, natural hazard areas, energy and transmission corridors, locations identified as likely renewable energy generation sites and their associated energy resources, <b>regionally significant industry</b> , <del>high class soils</del> highly productive land, and primary production activities on those <del>high class soils</del> highly productive land;
Submitter 5: Waikato Regional Council	5.15	APP12 - Future Proof tables	Support in part	The use of the * in this table is confusing and should be amended for clarity.	Amend: * <del>±</del> being the centre focused on and incorporating The Base shopping centre and generally comprising the block bordered by Te Rapa Road, Avalon Drive, Te Kowhai Road East and the Railway.
Submitter 5: Waikato Regional Council	5.16	APP12 - Future Proof tables	Support in part	The use of the * in this table is confusing and should be amended for clarity.	Amend: * <u>Note:</u> The future role and function of Hamilton's town centres and future town centres will be defined through <i>Hamilton Urban Growth Strategy</i> and district plan updates in the future.
Submitter 5: Waikato Regional Council	5.17	APP13 - Responsive Planning Criteria - Out-of-sequence and Unanticipated Developments (Future Proof local authorities)	Support in part	The word 'us' is incorrect and should be amended to 'use'.	Amend: F. In cases where the development is proposing to replace a planned land use with an unanticipated land use, whether it can be demonstrated that the proposal will not result in a shortfall in residential, commercial or industrial land, with robust data and evidence underpinning this analysis.
Submitter 5:	5.18	Maps - General	Support in part	These maps have been adapted from the maps in the Future Proof Strategy. The numbers in the legend on each	Amend maps to correct map number in each legend.

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Waikato Regional Council				map still have the Future Proof map numbers. These should be removed.	
<b>Submitter 5:</b> Waikato Regional Council	5.19	Map 43: Future Proof indicative urban and village enablement areas	Support in part	There is no red line on the map to correspond to Waikato Expressway in the legend.	Amend map to include the Waikato Expressway.
<b>Submitter 5:</b> Waikato Regional Council	5.20	Map 43: Future Proof indicative urban and village enablement areas	Support in part	There are numbers (1-13) on the map that do not correspond to anything in the WRPS change.	Remove numbers 1 -13 from the map.
<b>Submitter 5:</b> Waikato Regional Council	5.21	Map 44: Future Proof wāhi toitū and wāhi toiora areas	Support in part	The National Policy Statement for Highly Productive Land commenced on 17 October 2022. It introduces a definition of highly productive land which is broader in scope than the current WRPS definition of high class soils. The wāhi toitū and wāhi toiora maps, which the out-of-sequence and unanticipated development criteria rely on, use the high class soils definition. To avoid any inconsistency with the National Policy Statement for Highly Productive Land, the high class soils should be removed from Map 44: Future Proof wāhi toitū and wāhi toiora areas. The National Policy Statement for Highly Productive Land, as the higher order document, will need to be satisfied for the out-of-sequence and unanticipated development to then be assessed against the out-of-sequence and unanticipated development criteria. Peat soils were included as wāhi toitū and wāhi toiora as their physical qualities pose challenges to development rather than based on their quality for productive uses and should therefore be retained on the map.	Amend map to remove high class soils (LUC 1, 2 and 3(allophanic)). Retain peat layers.

Submitter	Sub point #	Provision number	Support/oppose	Submission point	Relief sought
Submitter 6: Thames-Coromandel District Council	6.1	1.6 Definitions	Oppose	A definition of "Affordable housing" is required to be able to provide for 'Inclusionary zoning'.	Include a definition for "Affordable housing"
Submitter 6: Thames-Coromandel District Council	6.2	1.6 Definitions	Oppose	The definition of 'inclusionary zoning' does not provide a definitive statement of this concept. Words such as " <i>a certain proportion</i> " are open to wide interpretation.  The zone is required to be " <i>retained ... for future generations</i> " does not have regard to future plan changes. Future plan changes for 'Inclusionary zoning' will provide land for affordable housing.	Amend the definition of "Inclusionary zoning" to include the proportion of 'affordable housing' to be required and delete retention for future generations.
Submitter 6: Thames-Coromandel District Council	6.3	SRMR-I4 - Managing the built environment	Support	Sufficient development capacity for housing and business land is necessary for an urban environment to function well.	Retain as notified.
Submitter 6: Thames-Coromandel District Council	6.4	SRMR-I4 - Managing the Built Environment	Support	The provision references the National Policy Statement on Urban Development 2020 which shall be put into effect in the WRPS.	Retain as notified.
Submitter 6: Thames-Coromandel District Council	6.5	IM-O5 - Climate Change	Support	Urban environments need to have regard to the effects of climate change.	Retain as notified.
Submitter 6: Thames-Coromandel District Council	6.6	IM-O9 - Amenity	Support	Amenity values do change over time but may not have an adverse effect on the environment.	Retain as notified.
Submitter 6: Thames-Coromandel District Council	6.7	UFD-O1 - Built Environment	Support	Matters 12. a. to f. support strategic planning for growth and develop for urban environments which also supports climate change, housing choice, including homes supporting Māori cultural tradition. Supports infrastructure and business needs in the short to long term and transport	Retain as notified.

Submitter	Sub point #	Provision number	Support/oppose	Submission point	Relief sought
				connectivity. Also takes into account the values of hapu and iwi for urban development.	
<b>Submitter 6:</b> Thames-Coromandel District Council	6.8	UFD-P2 - Co-ordinating growth and infrastructure	Support	The provision ensures that tier 3 local authorities have guidance on co-ordination of growth and infrastructure as set out in UPD-P18.	Retain the amendment to matter 2 of tier 3 local authorities as set out in UPD P18
<b>Submitter 6:</b> Thames-Coromandel District Council	6.9	UFD-P7 - Implementing the Coromandel Peninsula Blueprint	Support	The existing policy is out of date. Thames Coromandel District Council is outside of the Future Proof subregion and the generic provision will guide preparation of, and give effect to, growth strategies or equivalent.	Delete this provision.
<b>Submitter 6:</b> Thames-Coromandel District Council	6.10	UFD-P18 - Tier 3 local authority areas outside the Future Proof Strategy	Oppose	The inclusion of “shall” is a very directive requirement for a tier 3 local authority with settlements that do not meet the “urban environment” definition in the NPS UD 2020.	First sentence - Delete “shall” for this sentence to read as “New urban development in Tier 3 local authority areas should be managed in a way that:”
<b>Submitter 6:</b> Thames-Coromandel District Council	6.11	UFD-P18 - Tier 3 local authority areas outside the Future Proof Strategy	Oppose	Determining whether a territorial authority is a tier 3 local authority may be done via a resolution of council as noted in UFD-PR18.  Tier 3 local authority status – there appears to be no direction on the date when a local authority becomes a tier 3 local authority, except via the definition of “urban development” and resolution of council.  This requires further direction in the Regional Policy Statement.  Is a local authority a tier 3 when a growth strategy plan is either notified or approved by Council or is it when a plan change is notified or when it becomes operative	Clarification on the date when a local authority falls within tier 3.
<b>Submitter 6:</b>	6.12	UFD-P18 - Tier 3 local authority areas outside	Support	The provision provides a broad generic policy for growth, infrastructure, environment, and climate change when a local authority becomes a tier 3 local authority.	Support this provision except for the submission points noted.

Submitter	Sub point #	Provision number	Support/oppose	Submission point	Relief sought
Thames-Coromandel District Council		the Future Proof Strategy			
<b>Submitter 6:</b> Thames-Coromandel District Council	6.13	UFD-P19 - Being responsive to significant unintended and out-of-sequence growth within tier 3 local environments	Oppose	The NPS UD does not define a “local environment”.	Amend the title to this clause to remove “local environments” and insert “urban environments”.
<b>Submitter 6:</b> Thames-Coromandel District Council	6.14	UFD-P19 - Being responsive to significant unintended and out-of-sequence growth within tier 3 local environments	Support	The provision provides direction when there is significant unintended and out-of-sequence growth in tier 3 local environments – an assessment of the development principles in APP11 and the criteria APP14 to be included.	Retain as notified.
<b>Submitter 6:</b> Thames-Coromandel District Council	6.15	UFD-M6 - Growth strategies	Oppose	The use of “should” for territorial authorities and then “shall” for tier 1 and 3 territorial authorities shows inconsistency.  The word 'shall' is used to show strong intention/assertion about an action that will happen in the future. The word 'should' is used to give suggestions/advice. It's also used when talking about probable situations.	Oppose the inclusion of “shall” for tier 3 territorial authorities.  Use the word “should” as noted for territorial authorities.
<b>Submitter 6:</b> Thames-Coromandel District Council	6.16	UFD-M7 - Urban development planning	Support	Before land is rezoned for urban development – structure plans and town plans are a useful means of planning for urban development and should give effect to any council-approved growth strategy and/or plans.	Retain as notified.
<b>Submitter 6:</b>	6.17	UFD-M8 - Information to support new	Support	Adds the recognition of council-approved growth strategies and plans and development planning mechanisms to support new urban development and subdivision.	Retain as notified.

Submitter	Sub point #	Provision number	Support/oppose	Submission point	Relief sought
Thames-Coromandel District Council		urban development and subdivision			
<b>Submitter 6:</b> Thames-Coromandel District Council	6.18	UFD-M9 - Other party involvement.	Support	The provision allows third party involvement in development planning of growth strategies.	Retain as notified.
<b>Submitter 6:</b> Thames-Coromandel District Council	6.19	UFD-M33 - Keeping records on development and infrastructure trends	Support	Matter 5 will allow local authorities to collect relevant information to keep records, track and explain demand and supply of dwellings etc.	Retain as notified.
<b>Submitter 6:</b> Thames-Coromandel District Council	6.20	UFD-M36 - District plan provisions to implement the Coromandel Peninsula Blueprint	Support	UFD-P7 has been deleted which these sections give effect to, so this method should also be deleted.	Delete the provision.
<b>Submitter 6:</b> Thames-Coromandel District Council	6.21	UFD-M37 - Spatial Planning maps of district plan and regional plans	Support	UFD-P7 has been deleted which these sections give effect to, so this method should also be deleted.	Delete the provision.
<b>Submitter 6:</b> Thames-Coromandel District Council	6.22	UFD-M69 - Council-approved growth strategy or equivalent in tier 3 local authority areas	Support	The provision gives clear timeframes for updating or preparing a new council-approved growth strategy and what it should address when a local authority becomes a tier 3 local authority.	Support inclusion of this method.
<b>Submitter 6:</b>	6.23	UFD-M70 - District Plans	Support	The provision gives effect to UFD-P18 in District Plans for Tier 3 local authorities.	Retain as notified.

Submitter	Sub point #	Provision number	Support/oppose	Submission point	Relief sought
Thames-Coromandel District Council					
<b>Submitter 6:</b> Thames-Coromandel District Council	6.24	UFD-M71 - Housing Affordability	Oppose	Councils have limited tools to influence housing affordability – affordable housing is not defined – this would be required to be able to provide for ‘Inclusionary zoning’.	Oppose insertion of this provision.
<b>Submitter 6:</b> Thames-Coromandel District Council	6.25	UFD-M72 - Interim arrangements	Support	This provision allows urban growth to be managed by the Regional Policy Statement and maintains the status quo until such a time as a local authority has prepared or updated its council-approved growth strategy.	Retain as notified.
<b>Submitter 6:</b> Thames-Coromandel District Council	6.26	UFD-M74 - Tier 3 out-of-sequence or unanticipated developments.	Support	The provision guides when district and structure plans can consider alternative urban land release or timing of that release than that set out in the council-approved growth strategy.	Retain as notified.
<b>Submitter 6:</b> Thames-Coromandel District Council	6.27	UFD-PR7 - Implementing the Coromandel Peninsula Blueprint	Support	UFD-P7 has been deleted which this provision refers to.	Delete this provision
<b>Submitter 6:</b> Thames-Coromandel District Council	6.28	UFD-PR18 - Tier 3 local authority areas outside the Future Proof Strategy	Support	The provision gives reasons and explanations as to Tier 3 local authority areas outside the Future Proof Strategy.	Support inclusions of reasons.
<b>Submitter 6:</b> Thames-Coromandel District Council	6.29	UFD-PR19 - Being responsive to significant unintended and out-of-sequence growth within	Oppose	The title refers to “tier 3 local environments”, a term which is not defined in the NPS UD 2020	Amend the title to this clause to remove “local environments” and insert “urban environments”.

Submitter	Sub point #	Provision number	Support/oppose	Submission point	Relief sought
		tier 3 local environments.			
<b>Submitter 6:</b> Thames-Coromandel District Council	6.30	UFD-PR19 - Being responsive to significant unintended and out-of-sequence growth within tier 3 local environments.	Support	The reasons explain being responsive to significant unintended and out-of-sequence growth within tier 3 local environments.	Support inclusion of reasons.
<b>Submitter 6:</b> Thames-Coromandel District Council	6.31	UFD-AER10 - Anticipated Environmental Results	Support	The provision notes that amenity values will change over time.	Retain as notified.
<b>Submitter 6:</b> Thames-Coromandel District Council	6.32	UFD-AER18 - Anticipated Environmental Results	Support	UFD-P7 has been deleted which this provision relates to.	Delete the provision.
<b>Submitter 6:</b> Thames-Coromandel District Council	6.33	UFD-AER22 - Anticipated Environmental Results	Support	The anticipated result is consistent with the policies for tier 3 local authorities.	Retain as notified.
<b>Submitter 6:</b> Thames-Coromandel District Council	6.34	APP11 - Development principles	Support in part	Reworded title provides improved clarity.	The title can be one sentence - " <u>General development principles for new development are:</u> "
<b>Submitter 6:</b> Thames-Coromandel District Council	6.35	APP11 - Development principles	Oppose	The words are not necessary.	General development principles: Delete "... current and projected future ..." from clause p).
<b>Submitter 6:</b>	6.36	APP11 - Development principles	Support	The amended wording for Principles specific to rural-residential development provides better direction to planners.	Agree with amended wording.

Submitter	Sub point #	Provision number	Support/oppose	Submission point	Relief sought
Thames-Coromandel District Council					
<b>Submitter 6:</b> Thames-Coromandel District Council	6.37	APP14 – Responsive Planning Criteria – Out-of-sequence and Unanticipated Developments (Non-Future proof tier 3 local authorities)	Oppose	The reports required in this section for an application for a plan change will contribute to significant increased costs and additional delays in a decision issued by a territorial authority.	Delete this section or alternatively rewrite it to be consistent with APP11 - Development principles.
<b>Submitter 6:</b> Thames-Coromandel District Council	6.38	APP14 – Responsive Planning Criteria – Out-of-sequence and Unanticipated Developments (Non-Future proof tier 3 local authorities)	Oppose	The National Policy Statement on Urban Development 2020 does not require this assessment for a Tier 3 local authority.	In 'A', delete the requirement for a Housing and Business Development Capability Assessment or council monitoring.
<b>Submitter 6:</b> Thames-Coromandel District Council	6.39	General	Oppose	Urban environments need to have regard to the effects of climate change. However, the inclusion of "current and future" in the provisions relating to climate change are unnecessary as there is no change to the effect of the provision with these words deleted.	Amend provisions referring to climate change where the words "current and future" are used.  Delete the words "current and future" in provisions in the plan change so the relevant provision reads as follows: " <u>... the effects of climate change.</u> "
<b>Submitter 7:</b> Federated Farmers of New Zealand	7.1	1.6 Definitions	Oppose	The term 'urban development' is used frequently throughout the proposed changes but it not defined.  Federated Farmers is concerned that urban development is not currently defined. One of the main issues that rural	Provide definition of 'urban development' for the purposes of implementing the NPS-UD through Change 1 (point 2.5).

Submitter	Sub point #	Provision number	Support/oppose	Submission point	Relief sought
				<p>areas have with urban development is at the interface between urban areas and rural areas.</p> <p>Urban development needs to be clearly defined and to not include un-serviced large lot residential on the fringe of a city or town that results in inefficient use of the land resource and land use conflict.</p>	
<p><b>Submitter 7:</b> Federated Farmers of New Zealand</p>	7.2	General	Support in part	<p>Federated Farmers notes that there is a lack of clarity on how highly productive land should be managed under the RMA, and that the value of this land for primary production is often given inadequate consideration. It is agreed that this absence of considered decision-making is resulting in uncoordinated urban expansion over, and fragmentation of, highly productive land when less productive land is both usually available and better suited for urban use.</p> <p>They understand there is significant focus on LUC I-III, which is appreciated, but further thought needs to be put into LUC IV-VIII as there are certain crops that are better suited for lower class lands due to the land's limitations. Additionally, limitations of erosion, land instability, and inundation found in lower class lands may not be suitable for residential development.</p> <p>They support the recognition of the full range of benefits that are associated with high-class soils, the maintenance of available high-class soils for future generations, and the protection of high class soils from inappropriate subdivision, use and development.</p>	<p>FFNZ would appreciate a response from Council as to how the NPS-HPL will be incorporated into the RPS in the future and what implications this may have on the proposed changes.</p>
<p><b>Submitter 7:</b> Federated Farmers of New Zealand</p>	7.3	General	Not stated	<p>FFNZ notes that there are no fundamental changes proposed to the provisions that relate to the protection of rural areas, including reverse sensitivity provisions. Reverse sensitivity effects can restrict how primary sector enterprises can operate, and this can compromise the productivity of the land. This is no more evident than with</p>	<p>We wish to ensure that Council considers and implements these provisions (UFD-P18, APP13, and APP14) appropriately to not risk exacerbating reverse sensitivity issues.</p>

Submitter	Sub point #	Provision number	Support/oppose	Submission point	Relief sought
				urban expansion around horticultural food hubs, creating tension between new ventures and established producing communities.	
<b>Submitter 7:</b> Federated Farmers of New Zealand	7.4	UFD-P18 - Tier 3 local authority areas outside of Future Proof Strategy	Support	FFNZ supports UFD-P18 (Tier 3 local authority areas outside of Future Proof Strategy) clause 4 which aims to prevent a dispersed pattern of settlement and the resulting inefficiencies in managing resources that would arise from urban and residential development being located in the rural environment outside of identified urban growth areas.	Retain as notified.
<b>Submitter 7:</b> Federated Farmers of New Zealand	7.5	APP13 - Responsive Planning Criteria - Out-of-sequence and Unanticipated Developments (Future Proof local authorities)	Support	<p>APP13 provides responsive planning criteria for out-of-sequence and unanticipated developments for Future Proof local authorities (APP13, criteria A and B). This policy and any reference to it in other provisions, has the potential to threaten land otherwise protected for rural production activities.</p> <p>We acknowledge that urban development is necessary in some instances, and as such the criteria proposed is supported by Federated Farmers. In particular, we support APP13 Criteria B (d) which states ‘that the development would address an identified housing type/tenure/price point need’.</p>	Retain as notified.
<b>Submitter 7:</b> Federated Farmers of New Zealand	7.6	APP14 - Responsive Planning Criteria - Out-of-sequence and Unanticipated Developments (Non-Future Proof tier 3 local authorities)	Support	<p>APP14 provides responsive planning criteria for out-of-sequence and unanticipated developments for non-Future Proof tier 3 local authorities (APP14). This policy and any reference to it in other provisions, has the potential to threaten land otherwise protected for rural production activities.</p> <p>We acknowledge that urban development is necessary in some instances, and as such the criteria proposed is supported by Federated Farmers. In particular, we support APP14 (o) which states ‘the proposed development would</p>	Retain as notified.

Submitter	Sub point #	Provision number	Support/oppose	Submission point	Relief sought
				not adversely affect the function and vitality of existing rural settlements’.	
<b>Submitter 7:</b> Federated Farmers of New Zealand	7.7	APP14 - Responsive Planning Criteria - Out-of-sequence and Unanticipated Developments (Non-Future Proof tier 3 local authorities)	Support in part	FFNZ notes that there is a minor formatting error under APP14 where the clause discussed in point 4.5 of this submission has not been labelled correctly (i.e., has not been labelled as clause o) as evidenced in Figure 1 below  " <i>N. That the development avoids areas identified in district plans, regional plans or the Regional Policy Statement as having constraints to development.</i> <i>That the proposed development would not adversely affect the function and vitality of existing rural settlements and/or urban areas.</i> "	Fix the minor formatting error under APP14.
<b>Submitter 7:</b> Federated Farmers of New Zealand	7.8	1.6 Definitions	Oppose	FFNZ notes that the term ‘rural settlement’ is used throughout the document. The term is not defined in the current RPS or in the proposed amended glossary. FFNZ seeks clarity on what a ‘rural settlement’ covers and believes this term should be defined for implementation purposes.	Clarity on what a ‘rural settlement’ covers and definition of this term included in Change 1 for implementation purposes.
<b>Submitter 8:</b> Titanium Park Limited & Rukuhia Properties Limited	8.1	1.6 Definitions	Support	Definition of "urban environment" is supported.	Retain as notified.
<b>Submitter 8:</b> Titanium Park Limited & Rukuhia Properties Limited	8.2	1.6 Definitions	Support	Definition of "well-functioning urban environment" is supported	Retain as notified.

Submitter	Sub point #	Provision number	Support/oppose	Submission point	Relief sought
<b>Submitter 8:</b> Titanium Park Limited & Rukuhia Properties Limited	8.3	SRMR-I4 - Managing the built environment	Support	Supports SRMR-I4.	Retain as notified.
<b>Submitter 8:</b> Titanium Park Limited & Rukuhia Properties Limited	8.4	SRMR-PR4 - Managing the built environment	Support	Supports SRMR-PR4.	Retain as notified
<b>Submitter 8:</b> Titanium Park Limited & Rukuhia Properties Limited	8.5	IM-O5 - Climate change	Support	Supports IM-O5.	Retain as notified.
<b>Submitter 8:</b> Titanium Park Limited & Rukuhia Properties Limited	8.6	EIT-PR1 - Significant infrastructure and energy resources	Support	Supports EIT-PR1	Retain as notified.
<b>Submitter 8:</b> Titanium Park Limited & Rukuhia Properties Limited	8.7	UFD-O1 - Built environment	Support	Supports UFD-O1.	Retain as notified.
<b>Submitter 8:</b> Titanium Park Limited & Rukuhia	8.8	UFD-P11 - Adopting Future Proof land use pattern	Oppose in part	The alternative land release requirements in clause (7) of the policy are clear that justification must be provided for out-of-sequence or unanticipated development by	Retain as notified.

Submitter	Sub point #	Provision number	Support/oppose	Submission point	Relief sought
Properties Limited				demonstrating consistency with the principles of Future Proof land use pattern (which are contained in the APP11).  Clause (7) also refers to the responsive planning criteria in APP13 but only in terms of determining whether an urban development proposal is 'significant'. This is consistent with the clause 3.8 and Policy 8 of the NPS-UD. However, other provisions in the WRPS Change 1 are inconsistent with Policy UFD-P11(7).	
<b>Submitter 8:</b> Titanium Park Limited & Rukuhia Properties Limited	8.9	UFD-P12 - Density targets for Future Proof area	Support	Supports UFD-P12.	Retain as notified.
<b>Submitter 8:</b> Titanium Park Limited & Rukuhia Properties Limited	8.10	UFD-P15 - Monitoring and review in the Future Proof area	Support	Supports UFD-P15.	Retain as notified.
<b>Submitter 8:</b> Titanium Park Limited & Rukuhia Properties Limited	8.11	UFD-M33 - Keeping records on development and infrastructure trends	Support	Supports UFD-M33.	Retain as notified.
<b>Submitter 8:</b> Titanium Park Limited & Rukuhia Properties Limited	8.12	UFD-M47 - District plan provisions to implement the Future Proof land use pattern	Support	Supports UFD-M47.	Retain as notified.

Submitter	Sub point #	Provision number	Support/oppose	Submission point	Relief sought
<b>Submitter 8:</b> Titanium Park Limited & Rukuhia Properties Limited	8.13	UFD-M48 - Land release in the Future Proof area	Support	Supports UFD-M48.	Retain as notified
<b>Submitter 8:</b> Titanium Park Limited & Rukuhia Properties Limited	8.14	UFD-M49 - Out-of-sequence or unanticipated urban development	Oppose in part	<p>The approach set out in UFD-M49 is inconsistent with UFD-P11.</p> <p>While clause (7) of UFD-P11 is clear that justification must be provided for out-of-sequence or unanticipated development by demonstrating consistency with the principles of the Future Proof land use pattern (APP11), the policy only refers to APP13 being relevant to determining whether an urban development proposal is "significant". Method UFD-M49 introduces additional requirements for out-of-sequence or unanticipated urban development by requiring assessments against APP13 as part of the determination of whether alternative land release should be allowed at all.</p> <p>The approach in UFD-M49 conflates the requirement for regional policy statements to include criteria for determining what plan changes will be treated as adding significantly to development capacity (clause 3.8(3) of the NPS-UD) with consideration of whether out-of-sequence or unanticipated urban development should be allowed at all. The same criteria are proposed to be applied to both matters. However, some of the criteria in APP13 are not relevant to determining whether additional development capacity is significant and some of the criteria are not relevant to alternative land release.</p>	Amend UFD-M49 to make it consistent with UFD-P11.
<b>Submitter 8:</b> Titanium Park Limited &	8.15	UFD-M62 - Future Proof governance	Support	Supports UFD-M62.	Retain as notified.

Submitter	Sub point #	Provision number	Support/oppose	Submission point	Relief sought
Rukuhia Properties Limited		process for out-of-sequence or unanticipated urban development			
<b>Submitter 8:</b> Titanium Park Limited & Rukuhia Properties Limited	8.16	UFD-M64 - Public transport	Support	Supports UFD-M64.	Retain as notified.
<b>Submitter 8:</b> Titanium Park Limited & Rukuhia Properties Limited	8.17	UFD-M65 - Blue-Green network	Support	Supports UFD-M65.	Retain as notified.
<b>Submitter 8:</b> Titanium Park Limited & Rukuhia Properties Limited	8.18	UFD-M66 - Changing amenity values within urban environments	Support	Supports UFD-M66.	Retain as notified.
<b>Submitter 8:</b> Titanium Park Limited & Rukuhia Properties Limited	8.19	UFD-M58 - Reporting on development in the Future Proof area	Support	Supports UFD-M58.	Retain as notified.
<b>Submitter 8:</b> Titanium Park Limited & Rukuhia	8.20	UFD-M68 - Review of provisions	Support	Supports UFD-M68.	Retain as notified.

Submitter	Sub point #	Provision number	Support/oppose	Submission point	Relief sought
Properties Limited					
<b>Submitter 8:</b> Titanium Park Limited & Rukuhia Properties Limited	8.21	UFD-M72 - Interim arrangements	Support	Supports UFD-M72.	Retain as notified.
<b>Submitter 8:</b> Titanium Park Limited & Rukuhia Properties Limited	8.22	UFD-PR1 - Planned and co-ordinated subdivision, use and development	Support	Supports UFD-PR1.	Retain as notified.
<b>Submitter 8:</b> Titanium Park Limited & Rukuhia Properties Limited	8.23	UFD-PR11 - Adopting Future Proof land use pattern	Support in part	<p>The references to APP13 conflate the requirement for regional policy statements to include criteria for determining what plan changes will be treated as adding significantly to development capacity (clause 3.8(3) of the NPS-UD) with consideration of whether out-of-sequence or unanticipated urban development should be allowed at all. The same criteria are proposed to be applied to both matters. However, some of the criteria in APP13 are not relevant to determining whether additional development capacity is significant and some of the criteria are not relevant to alternative land release.</p> <p>The submitter generally supports the explanation of the reasons for UFD-M65 in the final paragraph in UFD-PR11 and the directive for the Future Proof partners to develop a cross-boundary blue-green network. However, the explanation should also refer to the importance of preparing the strategy with input from the community and stakeholders, including affected landowners.</p>	<p>Amend UFD-PR11 to make it consistent with UFD-P11. Retain reference to the criteria in APP13 needing to be weighted.</p> <p>Amend the final paragraph of UFD-PR11 as follows, or similar wording to achieve the outcome sought by the submitter:</p> <p>"UFD-M65 sets out how the Future Proof partners will collaborate <u>with one another, with community, affected landowners and stakeholder involvement</u> to develop a multi-functional, cross-boundary blue-green network which will be a defining spatial concept that aims to restore, enhance, connect and improve the natural environment within the Future Proof sub-region in a way that can integrate with new urban development and improve the liveability of urban areas.</p>

Submitter	Sub point #	Provision number	Support/oppose	Submission point	Relief sought
<b>Submitter 8:</b> Titanium Park Limited & Rukuhia Properties Limited	8.24	UFD-PR15 - Monitoring and review in the Future Proof area	Support	Supports UFD-PR15.	Retain as notified.
<b>Submitter 8:</b> Titanium Park Limited & Rukuhia Properties Limited	8.25	APP12 - Future Proof tables	Oppose in part	Update the Hamilton Airport/Southern Links industrial land allocation numbers in the table.	Amend the Industrial land allocation and staging (ha) 2020-2030 from '94' to <u>130</u> . Amend the Industrial land allocation and staging (ha) 2031-2050 from '46' to <u>60</u> . Amend the Total Allocation to 2050 (ha) from '140' to <u>190</u> .
<b>Submitter 8:</b> Titanium Park Limited & Rukuhia Properties Limited	8.26	APP12 - Future Proof tables	Oppose in part	Update the Hamilton Airport/Southern Links (explanation).	<b>Hamilton Airport/Southern Links</b> The land identified in Table 35 for the Airport/Southern Links is based on the <del>amount of land currently provided</del> <u>growth direction that is set out within for in the Waipā District Plan and the Waipā growth strategy, Waipā 2050 as well as an additional 60 ha beyond this.</u>  <u>The node includes 130 ha within the Northern Precinct that is plan-enabled and infrastructure ready in the short term. A further 60 ha is provided as the Northern Precinct expansion area between the Northern Precinct (to the east) and Southern Links designation (to the west) that provides longer term supply.</u>  <del>The node is currently affected by infrastructure constraints, particularly in the surrounding transport network. The Southern Links project will address some of the transport capacity issues but is currently a long term solution. Infrastructure solutions which are consistent with, and work towards a long term infrastructure pattern will be required to enable development in advance of the construction of Southern Links.</del>

Submitter	Sub point #	Provision number	Support/oppose	Submission point	Relief sought
Submitter 8: Titanium Park Limited & Rukuhia Properties Limited	8.27	APP13 - Responsive Planning Criteria - Out-of-sequence and Unanticipated Developments (Future Proof local authorities)	Oppose in part	<p>APP13 conflates the requirement for regional policy statements to include criteria for determining what plan changes will be treated as adding significantly to development capacity (clause 3.8(3) of the NPS-UD) with consideration of whether out-of-sequence or unanticipated urban development should be allowed at all. The same criteria are proposed to be applied in both matters.</p> <p>However, some of the criteria in APP13 are not relevant to determining whether additional development capacity is significant and some of the criteria are not relevant to alternative land release.</p>	Amend the criteria in APP13 so that they distinguish matters which are relevant to determining significance in terms of clause 3.8(3) of the NPS-UD from other matters that are relevant to alternative land release.
Submitter 8: Titanium Park Limited & Rukuhia Properties Limited	8.28	APP13 - Responsive Planning Criteria - Out-of-sequence and Unanticipated Developments (Future Proof local authorities)	Oppose in part	<p>It would be appropriate to enable demonstrated need or shortfall for housing or business floor space to be demonstrated through a Housing and Business Development Capacity Assessment (HBA) or council monitoring or evidence presented by an applicant. There may be important factors known to an applicant that are unable to be foreseen in a HBA or through council monitoring.</p> <p>Although clause A is relevant for determining what plan changes will be treated as adding significantly to development capacity (clause 3.8(3) of the NPS-UD), it should not be a mandatory requirement for alternative land release. There may be some situations where alternative land release is appropriate to achieve consistency with the development principles in APP11 and to create a well-functioning urban environment despite a short or medium term need or shortfall not existing.</p>	<p>Amend clause A in criteria A as follows:</p> <p>"That the development would add significantly to meeting a demonstrated need or shortfall for housing or business floor space, as identified in a Housing and Business Development Capacity Assessment or in council monitoring or in evidence prepared by an applicant."</p>
Submitter 8: Titanium Park Limited & Rukuhia	8.29	APP13 - Responsive Planning Criteria - Out-of-sequence and	Oppose in part	<p>Wahi toitu and wahi toiora are extensive and are mapped at a high level in WRPS Change 1 (Map 44). The use of the directive term "avoid" in clause O means not allowing and there cannot be any exceptions (<i>Environmental Defence Society Inc v New Zealand King Salmon Company Ltd</i> [2014])</p>	<p>Either:</p> <ol style="list-style-type: none"> <li>1. Amend the criteria related to wahi toitu and wahi toiora in clauses O, P and Q in criteria A to state that they do not apply to development proposals outside of Urban Enablement Areas; or</li> </ol>

Submitter	Sub point #	Provision number	Support/oppose	Submission point	Relief sought
Properties Limited		Unanticipated Developments (Future Proof local authorities)		NZSC 38). This creates a conflict between the WRPS provisions as some of the wahi toitu areas appear to be identified within Urban Enablement Areas where urban development is planned to occur. Clauses O, P, and Q may be relevant for determining alternative land release but they are not relevant to determining whether additional development capacity is significant (clause 3.8(3) of the NPS-UD).	<ol style="list-style-type: none"> <li>2. Amend the criteria related to wahi toitu and wahi toiora in clauses O, P and Q in criteria A to require that proposals for urban development must consider the values that make the area wahi toitu or wahi toiora and demonstrate that associated effects can be avoided, remedied or mitigated; or</li> <li>3. Amend Map 44 to remove wahi toitu and wahi toiora from Urban Enablement Areas in the same way that they are not shown within Urban Areas.</li> </ol>
<b>Submitter 8:</b> Titanium Park Limited & Rukuhia Properties Limited	8.30	APP13 - Responsive Planning Criteria - Out-of-sequence and Unanticipated Developments (Future Proof local authorities)	Oppose in part	<p>It is unclear what is meant by the extent to which cost neutrality for public finance can be achieved. It is also unclear how this would be readily demonstrated by plan change proponents.</p> <p>If infrastructure is required to enable an identified need for growth then councils are obliged to proactively plan for and fund the infrastructure. Growth infrastructure is typically funded from a range of sources, including council rates, development contributions and Government subsidies. It would be inappropriate to require the funding to achieve cost neutrality for public finances in all circumstances.</p>	Delete references to cost neutrality for public finance in: <ul style="list-style-type: none"> <li>- Clause K, criteria A</li> <li>- Clause B, criteria B</li> </ul>
<b>Submitter 8:</b> Titanium Park Limited & Rukuhia Properties Limited	8.31	Map 26: Significant transport corridors (Greater Hamilton)	Support	Map 26 is supported.	Retain as notified.
<b>Submitter 8:</b> Titanium Park Limited & Rukuhia Properties Limited	8.32	Map 43: Future Proof indicative urban and village enablement areas	Oppose in part	Map 43 is opposed in part.	<p>Amend Map 43 in line with Appendix 3 to this submission to:</p> <ol style="list-style-type: none"> <li>1. Include all the Northern Precinct and Northern Precinct Expansion Area within the extent of the "Urban Enablement Area"; and</li> </ol>

Submitter	Sub point #	Provision number	Support/oppose	Submission point	Relief sought
					<p>2. Include the PPC20 extent of the Northern Precinct (130ha) as "Short - Medium term development: 2020-2030"; and</p> <p>3. Identify the Northern Precinct Expansion Area (60ha) as a "Long-term development: 2031-2050" area; and</p> <p>And retain:</p> <p>4. The identification of the Airport as a "Strategic Industrial Node"; and</p> <p>5. Southern links.</p>
<b>Submitter 8:</b> Titanium Park Limited & Rukuhia Properties Limited	8.33	Map 44: Future Proof wahi toitu and wahi toiora areas	Oppose in part	Map 44 is opposed in part.	<p>Amend Map 44 to:</p> <p>1. Include "Urban Enablement Areas"; and</p> <p>2. Identify all of the Northern Precinct and Northern Precinct Expansion Area within the extent of the "Urban Enablement Area".</p>
<b>Submitter 9:</b> Ohinewai Lands Limited	9.1	1.6 Definitions	Oppose in part	Provisions in WRPS Change 1 refer to 'net target densities' that are to be achieved in defined locations (e.g. Policy UFD-P12). The term 'net density' is defined in Future Proof but not in either WRPS Change 1 or in the operative WRPS. It is important that 'net density' is defined to assist with interpreting the net density targets in Policy UFD-P12.	<p>Insert the following new definition for 'net density' (from Future Proof):</p> <p><u>"Net density</u> The total number of dwelling units per hectare of land developed for residential or mixed use (excludes streets, open space and non-residential uses)."</p>
<b>Submitter 9:</b> Ohinewai Lands Limited	9.2	1.6 Definitions	Oppose in part	WRPS Change 1 similarly introduces provisions that refer to developing a sub-regional blue-green network strategy (e.g. UFD-M65). The term 'blue-green network' is defined in Future Proof but not in either WRPS Change 1 or in the operative WRPS. The clarity and administration of the plan would be improved by defining 'blue-green network' because it is not a commonly understood term.	<p>Insert the following new definition for 'blue-green network' (from Future Proof):</p> <p><u>"Blue-green network</u> An overlay of the current and envisioned blue-green spatial framework that incorporates and integrates key elements such as wetlands, riverbeds, riparian corridors, significant biodiversity sites, habitat corridors, reserves, Department of Conservation land, parks, significant gardens, playgrounds, urban areas with high degree of tree cover, walking tracks and routes, cycling tracks, cycleways, bridal</p>

Submitter	Sub point #	Provision number	Support/oppose	Submission point	Relief sought
					<u>tracks, protected landscapes and viewshafts, and other key elements such as buffer zones as relevant.”</u>
<b>Submitter 9:</b> Ohinewai Lands Limited	9.3	1.6 Definitions	Oppose in part	Refer to reasons in submission point 7.	Delete the definition for “Inclusionary zoning”.
<b>Submitter 9:</b> Ohinewai Lands Limited	9.4	UFD-P11 - Adopting the Future Proof land use pattern	Support	<p>The alternative land release requirements in clause (7) of the policy are clear that justification must be provided for out-of-sequence or unanticipated development by demonstrating consistency with the principles of the Future Proof land use pattern (which are contained in APP11).</p> <p>Clause (7) also refers to the responsive planning criteria in APP13 but only in terms of determining whether an urban development proposal is ‘significant’. This is consistent with the clause 3.8 and Policy 8 of the NPS-UD. However, other provisions in WRPS Change 1 are inconsistent with Policy UFD-P11(7). Refer to submission points 6 and 9-13.</p>	Retain as notified.
<b>Submitter 9:</b> Ohinewai Lands Limited	9.5	UFD-P12 - Density targets for Future Proof area	Support	The net target density that the policy seeks to achieve for Ohinewai’s greenfield areas (20-25 dwellings per hectare) is consistent with Future Proof.	Retain as notified.
<b>Submitter 9:</b> Ohinewai Lands Limited	9.6	UFD-M49 - Out- of-sequence or unanticipated urban development	Oppose in part	While clause (7) of UFD-P11 is clear that justification must be provided for out-of-sequence or unanticipated development by demonstrating consistency with the principles of the Future Proof land use pattern (APP11), the policy only refers to APP13 being relevant to determining whether an urban development proposal is ‘significant’. Method UFD-M49 introduces additional requirements for out-of-sequence or unanticipated urban development by requiring assessments against APP13 as part of the determination of whether alternative land release should be allowed at all. The approach set out in UFD-M49 is therefore inconsistent with UFD-P11.	Amend UFD-M49 to make it consistent with UFD-P11.

Submitter	Sub point #	Provision number	Support/oppose	Submission point	Relief sought
				<p>The approach in UFD-M49 conflates the requirement for regional policy statements to include criteria for determining what plan changes will be treated as adding significantly to development capacity (clause 3.8(3) of the NPS-UD) with consideration of whether out-of-sequence or unanticipated urban development should be allowed at all. The same criteria are proposed to be applied to both matters. However, some of the criteria in APP13 are not relevant to determining whether additional development capacity is significant and some of the criteria are not relevant to alternative land release.</p>	
<p><b>Submitter 9:</b> Ohinewai Lands Limited</p>	<p>9.7</p>	<p>UFD-M63 - Housing Affordability</p>	<p>Oppose in part</p>	<ol style="list-style-type: none"> <li>1. The scope of WRPS Change 1 is limited to changes to implement the NPS-UD and to update the Future Proof components in the WRPS. Neither the NPS-UD nor Future Proof refer to inclusionary zoning.</li> <li>2. The NPS-UD requires housing affordability to be improved by supporting competitive land and development markets. If it were Government’s intention to require RMA planning documents to incorporate inclusionary zoning then the NPS-UD would have explicitly stated this.</li> <li>3. Inclusionary zoning imposes additional costs on developers which would make housing less affordable for some people (i.e. to subsidise the affordable housing aspect of the development). In the current economic environment, this is likely to make development less viable and reduce housing supply which would be contrary to the NPS-UD.</li> <li>4. Other matters which are addressed in UFD-M63 are relevant for achieving housing affordability and should be retained, including increasing housing supply, greater housing choice, more diverse dwelling typologies and alternative delivery partners. Referring to inclusionary zoning as a</li> </ol>	<p>Amend UFD-M63 by deleting “<i>and investigating inclusionary zoning</i>”.</p>

Submitter	Sub point #	Provision number	Support/oppose	Submission point	Relief sought
				<p>specific example is likely to elevate that mechanism above other available tools.</p> <p>5. The section 32 report for WRPS Change 1 concludes that mechanisms like inclusionary zoning are within the scope of RMA plans. While that may be the case, the section 32 report does not assess the costs or benefits of identifying inclusionary zoning as a method to be investigated.</p>	
<b>Submitter 9:</b> Ohinewai Lands Limited	9.8	UFD-M65 - Blue-Green network	Support in part	<p>The submitter agrees that a sub-regional blue-green network strategy should be prepared by the Future Proof partners in a holistic and co-ordinated way and that its purpose should be in accordance with items 1 to 6 in UFD-M65.</p> <p>Given the importance of the sub-regional blue-green network strategy for influencing regulatory and non-regulatory methods, it should be prepared with input from the community and stakeholders, including affected landowners. That approach would be consistent with UFD-M9 which recognises the importance of ‘other party involvement’ in the preparation of development planning mechanisms and with principles of natural justice.</p>	<p>Amend UFD-M65 as follows:</p> <p>“The Future Proof partners <del>should</del> <u>shall</u> work together to develop a sub-regional blue-green network strategy, <u>with input from the community, affected landowners and other stakeholders</u>. The strategy will assist in determining a sub-regional regulatory and non-regulatory framework for the establishment of a multi-functional blue-green network throughout the sub-region. The strategy will consider how the following aspects can be addressed holistically through the network:</p> <p>1. ...”</p>
<b>Submitter 9:</b> Ohinewai Lands Limited	9.9	UFD-PR11 - Adopting the Future proof land use pattern	Support in part	<p>1. The references to APP13 conflate the requirement for regional policy statements to include criteria for determining what plan changes will be treated as adding significantly to development capacity (clause 3.8(3) of the NPS-UD) with consideration of whether out-of-sequence or unanticipated urban development should be allowed at all. The same criteria are proposed to be applied to both matters. However, some of the criteria in APP13 are not relevant to determining whether additional development capacity is significant and some of the criteria are not relevant to alternative land release.</p>	<p>1. Amend UFD-PR11 to make it consistent with UFD-P11. Retain reference to the criteria in APP13 needing to be weighted.</p> <p>2. Amend the final paragraph of UFD-PR11 as follows, or similar wording to achieve the outcome sought by the submitter:</p> <p>“UFD-M65 sets out how the Future Proof partners will collaborate <u>with one another with community, affected landowner and stakeholder involvement</u> to develop a multi-functional, cross-boundary blue-green network which will be a defining spatial concept that aims to restore,</p>

Submitter	Sub point #	Provision number	Support/oppose	Submission point	Relief sought
				<ol style="list-style-type: none"> <li>2. Subject to submission point 7 above, it is appropriate to identify that housing affordability is a complex issue and that there are a range of tools, some of which require further investigation.</li> <li>3. The submitter generally supports the explanation of the reasons for UFD-M65 in the final paragraph in UFD-PR11 and the directive for the Future Proof partners to develop a cross-boundary blue-green network. However, the explanation should also refer to the importance of preparing the strategy with input from the community and stakeholders, including affected landowners.</li> </ol>	enhance, connect and improve the natural environment within the Future Proof sub-region in a way that can integrate with new urban development and improve the liveability of urban areas.”
<b>Submitter 9:</b> Ohinewai Lands Limited	9.10	APP13 - Responsive Planning Criteria – Out-of-sequence and Unanticipated Developments (Future Proof local authorities)	Oppose in part	APP13 conflates the requirement for regional policy statements to include criteria for determining what plan changes will be treated as adding significantly to development capacity (clause 3.8(3) of the NPS-UD) with consideration of whether out-of-sequence or unanticipated urban development should be allowed at all. The same criteria are proposed to be applied to both matters. However, some of the criteria in APP13 are not relevant to determining whether additional development capacity is significant and some of the criteria are not relevant to alternative land release.	Review and amend the criteria in APP13 so that they distinguish matters which are relevant to determining significance in terms of clause 3.8(3) of the NPS-UD from other matters that are relevant to alternative land release.
<b>Submitter 9:</b> Ohinewai Lands Limited	9.11	APP13 – Responsive Planning Criteria – Out-of-sequence and Unanticipated Developments (Future Proof local authorities)	Oppose in part	<ol style="list-style-type: none"> <li>1. It would be appropriate to enable demonstrated through a Housing and Business Development Capacity Assessment (HBA) <u>or</u> council monitoring <u>or</u> evidence presented by an applicant. There may be important factors known to an applicant that are unable to be foreseen in a HBA or through council monitoring.</li> <li>2. Although clause A is relevant for determining what plan changes will be treated as adding significantly to development capacity (clause 3.8(3) of the NPS-UD), it should not be a mandatory requirement for alternative land release. There may be some situations where alternative land release is appropriate to achieve</li> </ol>	<p>Amend clause A in criteria A as follows, or similar wording to achieve the outcome sought by the submitter:</p> <p>“That the development would add significantly to meeting a demonstrated need or shortfall for housing or business floor space, as identified in a Housing and Business Development Capacity Assessment or in council monitoring or in evidence prepared by an applicant”.</p>

Submitter	Sub point #	Provision number	Support/oppose	Submission point	Relief sought
				consistency with the development principles in APP11 and to create a well-functioning urban environment despite a short or medium-term need or shortfall not existing.	
Submitter 9: Ohinewai Lands Limited	9.12	APP13 - Responsive Planning Criteria - Out-of-sequence and Unanticipated Developments (Future Proof local authorities)	Oppose in part	<ol style="list-style-type: none"> <li>1. Wahi toitu and wahi toiora are extensive and are mapped at a high level in WRPS Change 1 (Map 44). The use of the directive term 'avoid' in clause O means not allowing and there cannot be any exceptions (<i>Environmental Defence Society Inc v New Zealand King Salmon Company Ltd</i> [2014] NZSC 38). This creates a conflict between the WRPS provisions as some of the wahi toitu areas appear to be identified within Urban Enablement Areas where urban development is planned to occur.</li> <li>2. Clauses O, P and Q may be relevant for determining alternative land release but they are not relevant to determining whether additional development capacity is significant (clause 3.8(3) of the NPS-UD).</li> </ol>	<ol style="list-style-type: none"> <li>1. Amend the criteria related to wahi toitu and wahi toiora in clauses O, P and Q in criteria A to state that they do not apply to development proposals outside of Urban Enablement Areas; <b>or</b></li> <li>2. Amend the criteria related to wahi toitu and wahi toiora in clauses O, P and Q in criteria A to require that proposals for urban development must consider the values that make the area wahi toitu or wahi toiora and demonstrate that associated effects can be avoided, remedied or mitigated; <b>or</b></li> <li>3. Amend Map 44 to remove wahi toitu and wahi toiora from Urban Enablement Areas by showing them as Urban Areas (see submission point 15).</li> </ol>
Submitter 9: Ohinewai Lands Limited	9.13	APP13 - Responsive Planning Criteria - Out-of-sequence and Unanticipated Developments (Future Proof local authorities)	Oppose in part	<ol style="list-style-type: none"> <li>1. It is unclear what is meant by the extent to which cost neutrality for public finance can be achieved. It is also unclear how this would be readily demonstrated by plan change proponents.</li> <li>2. If infrastructure is required to enable an identified need for growth then councils are obliged to proactively plan for and fund the infrastructure. Growth infrastructure is typically funded from a range of sources, including council rates, development contributions and Government subsidies, and the costs are often shared where there are wider benefits. It would be inappropriate to require the funding to achieve cost neutrality for public finances in all circumstances.</li> </ol>	Delete references to cost neutrality for public finance in clause K (criteria A) and clause B (criteria B).
Submitter 9: Ohinewai Lands Limited	914	Map 43: Future Proof indicative urban and village	Support in part	OLL supports the Urban Enablement Area shown in Map 43 for Ohinewai, which is consistent with Future Proof and includes the Future Urban zoned land within OLL's landholding.	Retain as notified.

Submitter	Sub point #	Provision number	Support/oppose	Submission point	Relief sought
		enablement areas			
<b>Submitter 9:</b> Ohinewai Lands Limited	9.15	Map 44: Future Proof wahi toitu and wahi toiora areas	Oppose in part	<ol style="list-style-type: none"> <li>1. It appears that some of the Urban Enablement Areas (existing and future urban areas) have been shown as Urban Areas on Map 44 and some have not (such as Ohinewai). All Urban Enablement Areas should be shown as Urban Areas. Otherwise, there would be a conflict between the WRPS provisions as some of the wahi toitu and wahi toiora areas appear to be identified within Urban Enablement Areas where urban development is planned to occur.</li> <li>2. The map would be easier to interpret if the names of towns were added to it.</li> </ol>	Amend Map 44 to show all Urban Enablement Areas as Urban Areas and to add the names of towns.
<b>Submitter 10:</b> Rangitahi Limited, Scenic Properties 2006 Limited and Raglan Land Company Limited	10.1	1.6 Definitions	Oppose in part	Provisions in WRPS Change 1 refer to 'net target densities' that are to be achieved in defined locations (e.g. Policy UFD-P12). The term 'net density' is defined in Future Proof but not in either WRPS Change 1 or in the operative WRPS. It is important that 'net density' is defined to assist with interpreting the net density targets in Policy UFD-P12.	<p>Insert the following new definition for 'net density' (from Future Proof):</p> <p><u>"Net density</u> The total number of dwelling units per hectare of land developed for residential or mixed use (excludes streets, open space and non-residential uses)."</p>
<b>Submitter 10:</b> Rangitahi Limited, Scenic Properties 2006 Limited and Raglan Land Company Limited	10.2	1.6 Definitions	Oppose in part	WRPS Change 1 similarly introduces provisions that refer to developing a sub-regional blue-green network strategy (e.g. UFD-M65). The term 'blue-green network' is defined in Future Proof but not in either WRPS Change 1 or in the operative WRPS. The clarity and administration of the plan would be improved by defining 'blue-green network' because it is not a commonly understood term.	<p>Insert the following new definition for 'blue-green network' (from Future Proof):</p> <p><u>"Blue-green network</u> An overlay of the current and envisioned blue-green spatial framework that incorporates and integrates key elements such as wetlands, riverbeds, riparian corridors, significant biodiversity sites, habitat corridors, reserves, Department of Conservation land, parks, significant gardens, playgrounds, urban areas with high degree of tree cover, walking tracks and routes, cycling tracks, cycleways, bridal tracks, protected landscapes and viewshafts, and other key elements such as buffer zones as relevant."</p>

Submitter	Sub point #	Provision number	Support/oppose	Submission point	Relief sought
<b>Submitter 10:</b> Rangitahi Limited, Scenic Properties 2006 Limited and Raglan Land Company Limited	10.3	1.6 Definitions	Oppose in part	Refer to reasons in submission point 7.	Delete the definition for “Inclusionary zoning”.
<b>Submitter 10:</b> Rangitahi Limited, Scenic Properties 2006 Limited and Raglan Land Company Limited	10.4	UFD-P11 - Adopting Future Proof land use pattern	Support	<p>The alternative land release requirements in clause (7) of the policy are clear that justification must be provided for out-of-sequence or unanticipated development by demonstrating consistency with the principles of the Future Proof land use pattern (which are contained in APP11).</p> <p>Clause (7) also refers to the responsive planning criteria in APP13 but only in terms of determining whether an urban development proposal is ‘significant’. This is consistent with the clause 3.8 and Policy 8 of the NPS-UD. However, other provisions in WRPS Change 1 are inconsistent with Policy UFD-P11(7). Refer to submission points 6 and 9-13.</p>	Retain as notified.
<b>Submitter 10:</b> Rangitahi Limited, Scenic Properties 2006 Limited and Raglan Land Company Limited	10.5	Policy UFD-P12 – Density targets for Future Proof area	Support in part	<ol style="list-style-type: none"> <li>1. The net target density that the policy seeks to achieve for Raglan’s greenfield areas (20-25 dwellings per hectare) is consistent with Future Proof.</li> <li>2. Rangitahi’s experience is that while the net target density may be achievable in specific places within Raglan’s greenfield areas, there are unique topographical and environmental considerations that will mean that it will be difficult to achieve everywhere. There needs to be flexibility to determine appropriate density responses through future structure planning processes.</li> </ol>	Retain UFD-P12 except to the extent that changes may be necessary to the policy or associated methods to address the matters under reason (2).

Submitter	Sub point #	Provision number	Support/oppose	Submission point	Relief sought
<b>Submitter 10:</b> Rangitahi Limited, Scenic Properties 2006 Limited and Raglan Land Company Limited	10.6	UFD-M49 - Out-of-sequence or unanticipated urban development	Oppose in part	<ol style="list-style-type: none"> <li>1. While clause (7) of UFD-P11 is clear that justification must be provided for out-of-sequence or unanticipated development by demonstrating consistency with the principles of the Future Proof land use pattern (APP11), the policy only refers to APP13 being relevant to determining whether an urban development proposal is 'significant'. Method UFD-M49 introduces additional requirements for out-of-sequence or unanticipated urban development by requiring assessments against APP13 as part of the determination of whether alternative land release should be allowed at all. The approach set out in UFD-M49 is therefore inconsistent with UFD-P11.</li> <li>2. The approach in UFD-M49 conflates the requirement for regional policy statements to include criteria for determining what plan changes will be treated as adding significantly to development capacity (clause 3.8(3) of the NPS-UD) with consideration of whether out-of-sequence or unanticipated urban development should be allowed at all. The same criteria are proposed to be applied to both matters. However, some of the criteria in APP13 are not relevant to determining whether additional development capacity is significant and some of the criteria are not relevant to alternative land release.</li> </ol>	Amend UFD-M49 to make it consistent with UFD-P11.
<b>Submitter 10:</b> Rangitahi Limited, Scenic Properties 2006 Limited and Raglan Land Company Limited	10.7	UFD-M63 - Housing affordability	Oppose in part	<ol style="list-style-type: none"> <li>1. The scope of WRPS Change 1 is limited to changes to implement the NPS-UD and to update the Future Proof components in the WRPS. Neither the NPS-UD nor Future Proof refer to inclusionary zoning.</li> <li>2. The NPS-UD requires housing affordability to be improved by supporting competitive land and development markets. If it were Government's intention to require RMA planning documents to</li> </ol>	Amend UFD-M63 by deleting " <i>and investigating inclusionary zoning</i> ".

Submitter	Sub point #	Provision number	Support/oppose	Submission point	Relief sought
				<p>incorporate inclusionary zoning then the NPS-UD would have explicitly stated this.</p> <ol style="list-style-type: none"> <li>3. Inclusionary zoning imposes additional costs on developers which would make housing less affordable for some people (i.e. to subsidise the affordable housing aspect of the development). In the current economic environment, this is likely to make development less viable and reduce housing supply which would be contrary to the NPS-UD.</li> <li>4. Other matters which are addressed in UFD-M63 are relevant for achieving housing affordability and should be retained, including increasing housing supply, greater housing choice, more diverse dwelling typologies and alternative delivery partners. Referring to inclusionary zoning as a specific example is likely to elevate that mechanism above other available tools.</li> <li>5. The section 32 report for WRPS Change 1 concludes that mechanisms like inclusionary zoning are within the scope of RMA plans. While that may be the case, the section 32 report does not assess the costs or benefits of identifying inclusionary zoning as a method to be investigated.</li> </ol>	
<p><b>Submitter 10:</b> Rangitahi Limited, Scenic Properties 2006 Limited and Raglan Land Company Limited</p>	10.8	UFD-M65 - Blue-Green network	Support in part	<ol style="list-style-type: none"> <li>1. The submitter agrees that a sub-regional blue-green network strategy should be prepared by the Future Proof partners in a holistic and co-ordinated way and that its purpose should be in accordance with items 1 to 6 in UFD-M65.</li> <li>2. Given the importance of the sub-regional blue-green network strategy for influencing regulatory and non-regulatory methods, it should be prepared with input from the community and stakeholders, including affected landowners. That approach would be consistent with UFD-M9 which recognises the importance of 'other party involvement' in the</li> </ol>	<p>Amend UFD-M65 as follows:</p> <p>"The Future Proof partners <del>should</del> <u>shall</u> work together to develop a sub-regional blue-green network strategy, <u>with input from the community, affected landowners and other stakeholders</u>. The strategy will assist in determining a sub-regional regulatory and non-regulatory framework for the establishment of a multi-functional blue-green network throughout the sub-region. The strategy will consider how the following aspects can be addressed holistically through the network:</p> <p>1 ..."</p>

Submitter	Sub point #	Provision number	Support/oppose	Submission point	Relief sought
				preparation of development planning mechanisms and with principles of natural justice.	
<b>Submitter 10:</b> Rangitahi Limited, Scenic Properties 2006 Limited and Raglan Land Company Limited	10.9	UFD-PR11 - Adopting Future Proof land use pattern	Support in part	<ol style="list-style-type: none"> <li>1. The references to APP13 conflate the requirement for regional policy statements to include criteria for determining what plan changes will be treated as adding significantly to development capacity (clause 3.8(3) of the NPS-UD) with consideration of whether out-of-sequence or unanticipated urban development should be allowed at all. The same criteria are proposed to be applied to both matters. However, some of the criteria in APP13 are not relevant to determining whether additional development capacity is significant and some of the criteria are not relevant to alternative land release.</li> <li>2. Subject to submission 7 above, it is appropriate to identify that housing affordability is a complex issue and that there are a range of tools, some of which require further investigation.</li> <li>3. The submitter generally supports the explanation of the reasons for UFD-M65 in the final paragraph in UFD-PR11 and the directive for the Future Proof partners to develop a cross-boundary blue-green network. However, the explanation should also refer to the importance of preparing the strategy with input from the community and stakeholders, including affected landowners.</li> </ol>	<ol style="list-style-type: none"> <li>1. Amend UFD-PR11 to make it consistent with UFD-P11. Retain reference to the criteria in APP13 needing to be weighted.</li> <li>2. Amend the final paragraph of UFD-PR11 as follows, or similar wording to achieve the outcome sought by the submitter:  “UFD-M65 sets out how the Future Proof partners will collaborate <u>with one another with community, affected landowner and stakeholder involvement</u> to develop a multi-functional, cross-boundary blue-green network which will be a defining spatial concept that aims to restore, enhance, connect and improve the natural environment within the Future Proof sub-region in a way that can integrate with new urban development and improve the liveability of urban areas.”</li> </ol>
<b>Submitter 10:</b> Rangitahi Limited, Scenic Properties 2006 Limited and Raglan Land Company Limited	10.10	APP13 - Responsive Planning Criteria - Out-of-sequence and Unanticipated Developments	Oppose in part	APP13 conflates the requirement for regional policy statements to include criteria for determining what plan changes will be treated as adding significantly to development capacity (clause 3.8(3) of the NPS-UD) with consideration of whether out-of-sequence or unanticipated urban development should be allowed at all. The same criteria are proposed to be applied to both matters.	Review and amend the criteria in APP13 so that they distinguish matters which are relevant to determining significance in terms of clause 3.8(3) of the NPS-UD from other matters that are relevant to alternative land release.

Submitter	Sub point #	Provision number	Support/oppose	Submission point	Relief sought
		(Future Proof local authorities)		However, some of the criteria in APP13 are not relevant to determining whether additional development capacity is significant and some of the criteria are not relevant to alternative land release.	
<b>Submitter 10:</b> Rangitahi Limited, Scenic Properties 2006 Limited and Raglan Land Company Limited	10.11	APP13 – Responsive Planning Criteria – Out-of-sequence and Unanticipated Developments (Future Proof local authorities)	Oppose in part	<ol style="list-style-type: none"> <li>1. It would be appropriate to enable demonstrated need or shortfall for housing or business floor space to be demonstrated through a Housing and Business Development Capacity Assessment (HBA) <u>or</u> council monitoring <u>or</u> evidence presented by an applicant. There may be important factors known to an applicant that are unable to be foreseen in a HBA or through council monitoring.</li> <li>2. Although clause A is relevant for determining what plan changes will be treated as adding significantly to development capacity (clause 3.8(3) of the NPS-UD), it should not be a mandatory requirement for alternative land release. There may be some situations where alternative land release is appropriate to achieve consistency with the development principles in APP11 and to create a well-functioning urban environment despite a short or medium-term need or shortfall not existing.</li> </ol>	<p>Amend clause A in criteria A as follows, or similar wording to achieve the outcome sought by the submitter:</p> <p>“That the development would add significantly to meeting a demonstrated need or shortfall for housing or business floor space, as identified in a Housing and Business Development Capacity Assessment or in council monitoring <u>or in evidence prepared by an applicant</u>”.</p>
<b>Submitter 10:</b> Rangitahi Limited, Scenic Properties 2006 Limited and Raglan Land Company Limited	10.12	APP13 – Responsive Planning Criteria – Out-of-sequence and Unanticipated Developments (Future Proof local authorities)	Oppose in part	<ol style="list-style-type: none"> <li>1. Wahi toitu and wahi toiora are extensive and are mapped at a high level in WRPS Change 1 (Map 44). The use of the directive term ‘avoid’ in clause O means not allowing and there cannot be any exceptions (<i>Environmental Defence Society Inc v New Zealand King Salmon Company Ltd</i> [2014] NZSC 38). This creates a conflict between the WRPS provisions as some of the wahi toitu areas appear to be identified within Urban Enablement Areas where urban development is planned to occur.</li> <li>2. Clauses O, P and Q may be relevant for determining alternative land release but they are not relevant</li> </ol>	<p>Either:</p> <ol style="list-style-type: none"> <li>1. Amend the criteria related to wahi toitu and wahi toiora in clauses O, P and Q in criteria A to state that they do not apply to development proposals outside of Urban Enablement Areas; <b>or</b></li> <li>2. Amend the criteria related to wahi toitu and wahi toiora in clauses O, P and Q in criteria A to require that proposals for urban development must consider the values that make the area wahi toitu or wahi toiora and demonstrate that associated effects can be avoided, remedied or mitigated; <b>or</b></li> </ol>

Submitter	Sub point #	Provision number	Support/oppose	Submission point	Relief sought
				to determining whether additional development capacity is significant (clause 3.8(3) of the NPS-UD).	3. Amend Map 44 to remove wahi toitu and wahi toiora from Urban Enablement Areas by showing them as Urban Areas (see submission 15).
<b>Submitter 10:</b> Rangitahi Limited, Scenic Properties 2006 Limited and Raglan Land Company Limited	10.13	APP13 – Responsive Planning Criteria – Out-of-sequence and Unanticipated Developments (Future Proof local authorities)	Oppose in part	<ol style="list-style-type: none"> <li>1. It is unclear what is meant by the extent to which cost neutrality for public finance can be achieved. It is also unclear how this would be readily demonstrated by plan change proponents.</li> <li>2. If infrastructure is required to enable an identified need for growth then councils are obliged to proactively plan for and fund the infrastructure. Growth infrastructure is typically funded from a range of sources, including council rates, development contributions and Government subsidies, and the costs are often shared where there are wider benefits. It would be inappropriate to require the funding to achieve cost neutrality for public finances in all circumstances.</li> </ol>	Delete references to cost neutrality for public finance in clause K (criteria A) and clause B (criteria B).
<b>Submitter 10:</b> Rangitahi Limited, Scenic Properties 2006 Limited and Raglan Land Company Limited	10.14	Map 43: Future Proof indicative urban and village enablement areas	Support in part	<p>Rangitahi supports the Urban Enablement Area shown in Map 43 for Raglan, which includes the Rangitahi Limited, Scenic Properties 2006 Limited and Raglan Land Company Limited landholdings in Rangitahi South and Raglan West. These areas are the most appropriate locations for Raglan's future growth because of:</p> <ol style="list-style-type: none"> <li>1. Proximity to water and wastewater infrastructure, including the water treatment plant, water reservoir and wastewater treatment plant;</li> <li>2. Proximity to the town's beaches;</li> <li>3. The potential for link roads to be constructed from SH23 and between Wainui Road, Te Hutewai Road and the Rangitahi Peninsula to connect the growth areas with other parts of the township and the beaches; and</li> <li>4. Their consistency with the Urban Enablement Area for Raglan in Future Proof and with the Raglan Development Plan in Waikato 2070.</li> </ol>	Retain the Urban Enablement Area for Raglan shown on Map 43.

Submitter	Sub point #	Provision number	Support/oppose	Submission point	Relief sought
<b>Submitter 10:</b> Rangitahi Limited, Scenic Properties 2006 Limited and Raglan Land Company Limited	10.15	Map 44: Future Proof wahi toitu and wahi toiora areas	Oppose in part	<ol style="list-style-type: none"> <li>1. It appears that some of the Urban Enablement Areas (existing and future urban areas) have been shown as Urban Areas on Map 44 and some have not (such as Raglan). All Urban Enablement Areas should be shown as Urban Areas. Otherwise, there would be a conflict between the WRPS provisions as some of the wahi toitu and wahi toiora areas appear to be identified within Urban Enablement Areas where urban development is planned to occur.</li> <li>2. The map would be easier to interpret if the names of towns were added to it.</li> </ol>	Amend Map 44 to show all Urban Enablement Areas as Urban Areas and to add the names of towns.
<b>Submitter 11:</b> Waka Kotahi	11.1	1.6 Definitions	Support	Waka Kotahi supports the definition for 'well-functioning urban environment' as it reflects Policy 1 of the National Policy Statement on Urban Development 2020 (NPS-UD).	Retain as notified.
<b>Submitter 11:</b> Waka Kotahi	11.2	SRMR-I2 - Effects of climate change	Support	Waka Kotahi supports the proposed amendment to SRMR-I2 as it is consistent with Objective 8 of the NPS-UD.	Retain as notified.
<b>Submitter 11:</b> Waka Kotahi	11.3	SRMR-I4 - Managing the built environment	Support	Waka Kotahi supports the proposed amendments to SRMR-I4.  Specifically, Waka Kotahi supports clause 13 as it will ensure that urban growth makes a positive contribution to well-functioning urban environments. This includes the ability to support multi-modal transport options and reduce vehicle kilometres travelled (VKT).	Retain as notified.
<b>Submitter 11:</b> Waka Kotahi	11.4	SRMR-PR2 - Effects of climate change	Support	Waka Kotahi supports the proposed amendment to SRMR-I2 as it is consistent with Objective 8 of the NPS-UD.	Retain as notified.
<b>Submitter 11:</b> Waka Kotahi	11.5	IM-O5 - Climate change	Support	Waka Kotahi supports the proposed amendment to SRMR-I2 as it is consistent with Objective 8 of the NPS-UD.	Retain as notified.
<b>Submitter 11:</b> Waka Kotahi	11.6	EIT-M4 - Regional Land Transport Plan	Support	Waka Kotahi supports this method and would like to be involved in the development of any strategic corridor policy.	Retain as notified.

Submitter	Sub point #	Provision number	Support/oppose	Submission point	Relief sought
Submitter 11: Waka Kotahi	11.7	UFD-O1 - Built environment	Support	Waka Kotahi supports the proposed amendments to UFD-O1 as it is consistent with Objective 8 of the NPS-UD. In addition, Waka Kotahi supports land use which enables improved connectivity within urban areas, particularly by active and public transport.	Retain as notified.
Submitter 11: Waka Kotahi	11.8	UFD-P2 - Co-ordinating growth and infrastructure	Support	Waka Kotahi supports the proposed amendments to UFD-P2. Spatial planning within Tier 3 areas will help provide a more coherent and co-ordinated approach to growth management. Closer integration of land use and infrastructure investment planning can contribute to a lower emissions pathway. This can help achieve Objectives 6 and 8 of the NPS-UD and transport targets 1 & 3 of the NZ Emissions Reduction Plan.	Retain as notified.
Submitter 11: Waka Kotahi	11.9	UFD-P10 - Government collaboration in the Future Proof area	Support	Waka Kotahi supports the proposed amendments to UFD-P10. Waka Kotahi is a Future Proof partner. Collaborative working will contribute to a more co-ordinated and integrated approach to land use and infrastructure planning and implementation.	Retain as notified.
Submitter 11: Waka Kotahi	11.10	UFD-P11 - Adopting Future Proof land use pattern	Support in part	<p>Waka Kotahi supports the proposed amendments to UFD-P11. The proposed amendments will contribute to achieving well-functioning urban environments that support mode shift towards greater public and active transport, as well as a reduction of VKT. It will also give effect to the NPS-UD, Future Proof Strategy and achieve transport target 1 of the NZ Emissions Reduction Plan.</p> <p>However, Waka Kotahi considers that the term 'significant' needs to be defined in relation to development capacity. It is not clear within the RPS as to what constitutes as 'significant'. Defining this will aid plan user interpretation and provide clarity as to what form of development is considered significant.</p>	Define 'significant development' in relation to having regard to development capacity.
Submitter 11: Waka Kotahi	11.11	UFD-P12 - Density targets	Support	Waka Kotahi supports the proposed amendments to UFD-P12 as it reflects the NPS-UD in that it seeks to achieve	Retain as notified.

Submitter	Sub point #	Provision number	Support/oppose	Submission point	Relief sought
		for Future Proof area		compact urban environments that support active transport and rapid and frequent public transport. In addition, increasing densities will support modal shift towards public and active transport in accordance with the Future Proof radical transport shift and the Hamilton-Waikato Metro Spatial Plan Transport Programme Business Case.	
<b>Submitter 11:</b> Waka Kotahi	11.12	UFD-P15 - Monitoring and review in the Future Proof area	Support	Waka Kotahi supports the proposed amendments to UFD-P15, specifically that consultation will be undertaken with Waka Kotahi where any of the listed situations occur.	Retain as notified.
<b>Submitter 11:</b> Waka Kotahi	11.13	UFD-P18 - Tier 3 local authority areas outside the Future Proof Strategy	Support	Waka Kotahi supports this policy. This policy will help to achieve an integrated approach between land use and infrastructure investment planning. It will also contribute to achieving well-functioning urban environments that support a modal shift towards greater public and active transport use and a reduction of VKT.	Retain as notified.
<b>Submitter 11:</b> Waka Kotahi	11.14	UFD-P19 - Being responsive to significant unintended and out-of-sequence growth within tier 3 local environments	Support	Waka Kotahi supports this policy as it requires justification to be provided in relation to APP11 and APP14, noting that Waka Kotahi supports the criteria within these appendices (subject to amendments to APP14). In addition, this policy will support the delivery of well-functioning urban environments that enable a modal shift towards public and active transport and a reduction in VKT.	Retain as notified.
<b>Submitter 11:</b> Waka Kotahi	11.15	UFD-M44 - Resourcing Implementation in the Future Proof area	Support	Waka Kotahi supports the proposed amendments to this method. However, it is noted that Waka Kotahi will need to take into account our national statutory processes that determine whether we can prioritise resources and the timing for delivery.	Retain as notified.
<b>Submitter 11:</b> Waka Kotahi	11.16	UFD-M46 - Implementation protocols in the	Support	Waka Kotahi supports the proposed amendments to this method. As a Future Proof partner, Waka Kotahi will contribute to protocols for implementation of the Future Proof strategy.	Retain as notified.

Submitter	Sub point #	Provision number	Support/oppose	Submission point	Relief sought
		Future Proof area			
<b>Submitter 11:</b> Waka Kotahi	11.17	UFD-M48 - Land release in Future Proof area	Support	Waka Kotahi supports the proposed amendments to this method. As a Future Proof partner, Waka Kotahi will work with other partners and agencies and use its best endeavours to help secure resourcing to support the servicing of the Future Proof land use pattern. However, it is noted that Waka Kotahi will need to take into account our national statutory processes that determine whether we can prioritise resources and the timing for delivery.	Retain as notified.
<b>Submitter 11:</b> Waka Kotahi	11.18	UFD-M49 - Out-of-sequence or unanticipated urban development	Support	Waka Kotahi supports the criteria to which district plans and structure plans must consider when allowing out of sequenced or anticipated development.	Retain as notified.
<b>Submitter 11:</b> Waka Kotahi	11.19	UFD-M62 - Future Proof governance process for out-of-sequence or unanticipated urban development	Support	As a Future Proof partner, Waka Kotahi supports the requirement to develop a protocol to agree how to involve each of the partners in decision-making relating to out-of-sequence or unanticipated development.	Retain as notified.
<b>Submitter 11:</b> Waka Kotahi	11.20	UFD-M64 - Public transport	Support	Waka Kotahi supports the requirement for Future Proof partners to investigate and confirm a preferred rapid and frequent public transport network including the location of corridors and services to support the Future Proof settlement pattern.	Retain as notified.
<b>Submitter 11:</b> Waka Kotahi	11.21	UFD-M65 - Blue-Green network	Support	Waka Kotahi supports opportunities to integrate active transport within the blue green network. This has the potential to support modal shift and reduce VKT.	Retain as notified.
<b>Submitter 11:</b> Waka Kotahi	11.22	UFD-M52 - Infill targets	Support	Waka Kotahi supports the proposed amendments to this method. The targets are consistent with those set in the Future Proof Strategy. Increasing development within	Retain as notified.

Submitter	Sub point #	Provision number	Support/oppose	Submission point	Relief sought
				existing urban areas will support a compact urban form whilst supporting a modal shift to public and active transport, and a reduction in VKT.	
<b>Submitter 11:</b> Waka Kotahi	11.23	UFD-M67 - Metropolitan centres	Support in part	Waka Kotahi supports UFD-M67. However, Waka Kotahi consider that clause 3 should be expanded to include active modes. This amendment will support modal shift.	Amend UFD-M67 as follows:  Centres identified in Table 37 as future metropolitan centres may be re-classified in district plans as metropolitan centres where it can be demonstrated that the following features are met: 3. the centre supports <u>active modes and high quality public transport</u> with high trip generation
<b>Submitter 11:</b> Waka Kotahi	11.24	UFD-M69 - Council-approved growth strategy or equivalent in tier 3 local authority areas	Support in part	Waka Kotahi supports the requirement for Tier 3 local authorities to prepare a new or updated council-approved growth strategy or equivalent plans and strategies to manage growth in accordance with UFD-P18.  However, Waka Kotahi considers that further clarification is required on what constitutes as 'good accessibility'. This may include walkable catchments or be based on the availability and frequency of public transport services. However, it is not clear whether the term encompasses those aspects. Therefore, Waka Kotahi consider that the term requires defining.	Define the term 'good accessibility'.
<b>Submitter 11:</b> Waka Kotahi	11.25	UFD-M70 - District Plans	Support	Waka Kotahi supports the requirement that district plans shall include provisions to give effect to UFD-P18.	Retain as notified.
<b>Submitter 11:</b> Waka Kotahi	11.26	UFD-M74 – Tier 3 out-of-sequence or unanticipated developments	Support	Waka Kotahi supports the matters to which out of sequence or unanticipated developments must meet in order to be considered by Council, specifically the matters within APP11 and APP14.	Retain as notified.
<b>Submitter 11:</b> Waka Kotahi	11.27	UFD-PR11 - Density targets for Future Proof area	Support	Waka Kotahi supports the way in which Criteria A and B within APP 13 will apply. In addition, Waka Kotahi supports the amendment in relation to UFD-M64 that recognises the need for good quality public transport provision, and the	Retain as notified.

Submitter	Sub point #	Provision number	Support/oppose	Submission point	Relief sought
				<p>role of programme business cases in providing an evidential base for the future rapid and frequent public transport network.</p> <p>However, it is noted that Waka Kotahi will need to take into account our national statutory processes that determine whether we can prioritise resources and the timing for delivery of infrastructure.</p>	
<b>Submitter 11:</b> Waka Kotahi	11.28	UFD-PR12 - Density targets for Future Proof area	Support	Waka Kotahi supports the amendments to UFD-PR12 to reflect walking and cycling as well as rapid and frequent public transport.	Retain as notified.
<b>Submitter 11:</b> Waka Kotahi	11.29	APP11 - Development principles	Support	Waka Kotahi supports the proposed changes to APP11 to support a reduction in greenhouse gas emissions within urban environments.	Retain as notified.
<b>Submitter 11:</b> Waka Kotahi	11.30	APP13 - Responsive Planning Criteria - Out-of-sequence and Unanticipated Developments (Future Proof local authorities)	Support in part	<p>Waka Kotahi supports APP13 as it gives effect to the NPS-UD, the Future Proof Strategy growth management approach and will help achieve transport target 1 of the NZ Emissions Reduction Plan. In addition, APP13 will also help to achieve an integrated approach between land use and infrastructure investment planning.</p> <p>Waka Kotahi supports the requirements within Clause A. However, for reasons outlined elsewhere within this submission, Waka Kotahi seeks clarification on what constitutes a development as being 'significant'.</p>	Define 'significant development' in relation to having regard to development capacity.
<b>Submitter 11:</b> Waka Kotahi	11.31	APP13 - Responsive Planning Criteria - Out-of-sequence and Unanticipated Developments	Support in part	Waka Kotahi supports APP13 as it gives effect to the NPS-UD, the Future Proof Strategy growth management approach and will help achieve transport target 1 of the NZ Emissions Reduction Plan. In addition, APP13 will also help to achieve an integrated approach between land use and infrastructure investment planning.	Define the term 'good accessibility'.

Submitter	Sub point #	Provision number	Support/oppose	Submission point	Relief sought
		(Future Proof local authorities)		Clause D requires development to have good accessibility. However, for reasons outlined elsewhere within this submission, Waka Kotahi seeks clarification on what constitutes as 'good accessibility'.	
Submitter 11: Waka Kotahi	11.32	APP14 - Responsive Planning Criteria - Out-of-sequence and Unanticipated Developments (Non-Future Proof tier 3 local authorities)	Support in part	<p>Waka Kotahi supports APP14 as it gives effect to the NPS-UD and will help achieve transport target 1 of the NZ Emissions Reduction Plan. In addition, APP14 will also help to achieve an integrated approach between land use and infrastructure investment planning.</p> <p>Waka Kotahi supports the requirements within Clause A. However, for reasons outlined elsewhere within this submission, Waka Kotahi seeks clarification on what constitutes a development as being 'significant'.</p>	Define 'significant development' in relation to having regard to development capacity.
Submitter 11: Waka Kotahi	11.33	APP14 - Responsive Planning Criteria - Out-of-sequence and Unanticipated Developments (Non-Future Proof tier 3 local authorities)	Support in part	<p>Waka Kotahi supports APP14 as it gives effect to the NPS-UD and will help achieve transport target 1 of the NZ Emissions Reduction Plan. In addition, APP14 will also help to achieve an integrated approach between land use and infrastructure investment planning.</p> <p>Clause C requires development to have good accessibility. However, for reasons outlined elsewhere within this submission, Waka Kotahi seeks clarification on what constitutes as 'good accessibility'.</p>	Define the term 'good accessibility'.
Submitter 12: The Adare Company Limited	12.1	1.6 Definitions	Oppose in part	Provisions in WRPS Change 1 refer to 'net target densities' that are to be achieved in defined locations (e.g. Policy UFD-P12). The net target densities proposed reflect the outcome of Future Proof. The term 'net density' is defined in Future Proof but is not defined in either WRPS Change 1 or in the operative WRPS. It is important that 'net density' is defined to assist with interpreting the net density targets in Policy UFD-P12.	<p>Insert the following new definition for 'net density' (from Future Proof):</p> <p><u>"Net density</u>  <u>The total number of dwelling units per hectare of land developed for residential or mixed use (excludes streets, open space and nonresidential uses)."</u></p>
Submitter 12:	12.2	1.6 Definitions	Oppose in part	WRPS Change 1 similarly introduces provisions that refer to developing a sub-regional blue-green network strategy	Insert the following new definition for 'blue-green network' (from Future Proof):

Submitter	Sub point #	Provision number	Support/oppose	Submission point	Relief sought
The Adare Company Limited				(e.g. UFD-M65). The term 'blue-green network' is defined in Future Proof but not in either WRPS Change 1 or in the operative WRPS. The clarity and administration of the plan would be improved by defining 'blue-green network' because it is not a commonly understood term.	<u>"Blue green network</u> An overlay of the current and envisioned blue-green spatial framework that incorporates and integrates key elements such as wetlands, riverbeds, riparian corridors, significant biodiversity sites, habitat corridors, reserves, Department of Conservation land, parks, significant gardens, playgrounds, urban areas with a high degree of tree cover, walking tracks and routes, cycling tracks, cycleways, bridal tracks, protected landscapes and viewshafts, and other key elements such as buffer zones as relevant."
<b>Submitter 12:</b> The Adare Company Limited	12.3	1.6 Definitions	Oppose in part	Refer to reasons in submission point 5.	Delete the definition for "Inclusionary zoning".
<b>Submitter 12:</b> The Adare Company Limited	12.4	UFD-P12 – Density targets for Future Proof area	Support	The density targets for Peacocke are consistent with Future Proof and PC5.	Retain as notified.
<b>Submitter 12:</b> The Adare Company Limited	12.5	UFD-M63 - Housing Affordability	Oppose in part	<ol style="list-style-type: none"> <li>1. The scope of WRPS Change 1 is limited to changes to implement the NPS-UD and to update the Future Proof components in the WRPS. Neither the NPS-UD nor Future Proof refer to inclusionary zoning.</li> <li>2. The NPS-UD requires housing affordability to be improved by supporting competitive land and development markets. If it were Government's intention to require RMA planning documents to incorporate inclusionary zoning, then the NPS-UD would have explicitly stated this.</li> <li>3. Inclusionary zoning imposes additional costs on developers which would make housing less affordable for some people (i.e. to subsidise the affordable housing aspect of the development). In the current economic environment, this is likely to</li> </ol>	Amend UFD-M63 by deleting " <i>and investigating inclusionary zoning</i> ".

Submitter	Sub point #	Provision number	Support/oppose	Submission point	Relief sought
				<p>make development less viable and reduce housing supply which would be contrary to the NPS-UD.</p> <p>4. Other matters which are addressed in UFD-M63 are relevant for achieving housing affordability and should be retained, including increasing housing supply, greater housing choice, more diverse dwelling typologies and alternative delivery partners. Referring to inclusionary zoning as a specific example is likely to elevate that mechanism above other available tools.</p> <p>5. The section 32 report for WRPS Change 1 concludes that mechanisms like inclusionary zoning are within the scope of RMA plans. While that may be the case, the section 32 report does not assess the costs or benefits of identifying inclusionary zoning as a method to be investigated.</p>	
<p><b>Submitter 12:</b> The Adare Company Limited</p>	12.6	UFD-M65 - Blue-Green network	Support in part	<p>1. Adare agrees that a sub-regional blue-green network strategy should be prepared by the Future Proof partners and that its purpose should be in accordance with items 1 to 6 in UFD-M65. Recent plan change and consent processes, including PC5 and Amberfield (<i>Weston Lea Limited v Hamilton City Council</i> [2020] NZEnvC 189), have confirmed the importance of a holistic co-ordinated strategy for indigenous biodiversity, particularly in relation to the long-tailed bat.</p> <p>2. Given the importance of the sub-regional blue-green network strategy for influencing regulatory and nonregulatory methods, it should be prepared with input from the community and stakeholders, including affected landowners. Amendments should be made to UFD-M65 to reflect this. That approach would be consistent with UFD-M9 which recognises the importance of ‘other party involvement’ in the preparation of development</p>	<p>Amend UFD-M65 as follows: "The Future Proof partners <del>should</del> <u>shall</u> work together to develop a sub-regional blue-green network strategy, <u>with input from the community, affected landowners and other stakeholders</u>. The strategy will assist in determining a sub-regional regulatory and non-regulatory framework for the establishment of a multi-functional blue-green network throughout the sub-region. The strategy will consider how the following aspects can be addressed holistically through the network: 1. ..."</p>

Submitter	Sub point #	Provision number	Support/oppose	Submission point	Relief sought
				planning mechanisms and with principles of natural justice.	
<b>Submitter 12:</b> The Adare Company Limited	12.7	UFD-PR11 - Adopting Future Proof land use pattern	Support in part	<ol style="list-style-type: none"> <li>1. Subject to submission point 5 above, it is appropriate to identify that housing affordability is a complex issue and that there are a range of tools, some of which require further investigation.</li> <li>2. Adare generally supports the explanation of the reasons for UFD-M65 and the directive for the Future Proof partners to develop a cross-boundary blue-green network. However, the explanation should also refer to the importance of preparing the strategy with input from the community and stakeholders, including affected landowners.</li> </ol>	Amend UFD-PR11 as follows:  “... UFD-M65 sets out how the Future Proof partners will collaborate <u>with one another with community, affected landowner and stakeholder involvement</u> to develop a multi-functional, cross-boundary blue green network which will be a defining spatial concept that aims to restore, enhance, connect and improve the natural environment within the Future Proof sub-region in a way that can integrate with new urban development and improve the liveability of urban areas.”
<b>Submitter 12:</b> The Adare Company Limited	12.8	Map 43: Future Proof indicative urban and village enablement areas	Support in part	While grey shading appears to be used on Map 43 to identify existing urban areas, it is unclear what the grey shaded areas shown within the Peacocke Structure Plan Area in Hamilton City mean. The grey shading should be removed from the map where it does not identify an existing urban area to avoid uncertainty and confusion.	Amend the map to delete the innominate grey areas shown within the Peacocke Structure Plan Area in Hamilton City (refer to submission document).
<b>Submitter 13:</b> Future Proof	13.1	1.9.4 Waikato Regional Policy Statement	Support	Future Proof supports the inclusion of Te Ture Whaimana as a qualifying matter, as this recognises the significance of Te Ture Whaimana as a primary direction-setting document in the Waikato region. This recognition aligns with the Vision and Guiding Principles in the Future Proof Strategy.	Retain as notified, except for any amendments to text or mapping required to give effect to the NPS-HPL.
<b>Submitter 13:</b> Future Proof	13.2	General	Support	Future Proof supports the proposed changes/insertions/deletions to provisions to ensure that the WRPS gives effect to the NPS-UD, provides guidance for territorial authorities on creating well-functioning urban environments and addressing climate change and greenhouse gas emission reductions.	Retain as notified, except for any amendments to text or mapping required to give effect to the NPS-HPL.
<b>Submitter 13:</b> Future Proof	13.3	General	Support	Future Proof supports the provisions regarding the investigation and confirmation of a preferred rapid and frequent public transport network, as well as the	Retain as notified, except for any amendments to text or mapping required to give effect to the NPS-HPL.

Submitter	Sub point #	Provision number	Support/oppose	Submission point	Relief sought
				development of a blue-green network. These actions are in line with the Implementation Actions as set out in the Strategy.	
<b>Submitter 13:</b> Future Proof	13.4	General	Support	Future Proof supports the inclusion of the updated Future Proof land use pattern, metropolitan centre criteria, industrial land release, net target densities and associated terminology, as agreed to by Future Proof partners and included in the Future Proof Strategy.	Retain as notified, except for any amendments to text or mapping required to give effect to the NPS-HPL.
<b>Submitter 13:</b> Future Proof	13.5	APP13 - Responsive Planning Criteria - Out-of-sequence and Unanticipated Developments (Future Proof local authorities)	Support	Future Proof supports the inclusion out-of-sequence and unanticipated development criteria in APP13, as agreed to by Future Proof partners and required pursuant to the NPS-UD. Inclusion of this criteria ensures that any significant development proposal not identified in the land use pattern can be assessed with regard to a number of strategic matters, including (but not limited to) greenhouse gas reduction, provision of active and public transport and consideration of how the proposal gives effect to Te Ture Whaimana.	Retain as notified, except for any amendments to text or mapping required to give effect to the NPS-HPL.
<b>Submitter 13:</b> Future Proof	13.6	5.2 Maps	Support	<p>Future Proof supports the inclusion of updated maps illustrating the Future Proof land use pattern and strategic transportation. The proposed maps are aligned with the maps and information contained in the Future Proof strategy, as well as assisting plan users in interpreting the requirements of the WRPS.</p> <p>Future Proof additionally supports the inclusion of a map illustrating the Future Proof wāhi toitū and wāhi toiōra areas. This ensures that these areas are carefully planned for and considered in development proposals.</p>	Retain as notified, except for any amendments to text or mapping required to give effect to the NPS-HPL.
<b>Submitter 14:</b> Waikato District Council	14.1	1.6 Definitions	Support in part	WDC supports the incorporation of the definition for 'inclusionary zoning' to enable the provision of affordable housing. The intent of the definition may need to be widened to consider that either a certain proportion of new residential development be provided as affordable	<p>Amend the definition of 'inclusionary zoning' in Provision 1.6 as follows:</p> <p>Inclusionary Zoning – a type of district plan provision which requires a certain proportion of new residential</p>

Submitter	Sub point #	Provision number	Support/oppose	Submission point	Relief sought
				housing, or a cash contribution be made to achieve the objective of providing affordable housing via another process.	development to be provided as affordable housing <u>or a cash contribution to support the provision of affordable housing</u> and retained as affordable for future generations.
<b>Submitter 14:</b> Waikato District Council	14.2	1.9 - Te Ture Whaimana o Te Awa o Waikato – Vision and Strategy for the Waikato River	Support	WDC support the amendments made to ‘1.9 Te Ture Whaimana o Te Awa o Waikato – Vision and Strategy for the Waikato River’ to reflect the introduction of Te Ture Whaimana o te Awa o Waikato – the Vision and Strategy for the Waikato River as a qualifying matter in relation to Sections 77I and 77O of the Resource Management Act 1991 as introduced by the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021.	Amend Provision 1.9.4 as follows:  <u>Clauses Sections 77I and 77O</u> of the Resource Management Act 1991, as introduced by the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021....
<b>Submitter 14:</b> Waikato District Council	14.3	UFD-O1 - Built environment	Support	WDC supports the introduction of Objective 12 Urban Form and Development, Built Environment to deliver on the NPS-UD requirements.	Retain as notified.
<b>Submitter 14:</b> Waikato District Council	14.4	UFD-P9 - Implementing Franklin District Growth Strategy	Support	WDC supports the deletion of Implementing Franklin District Growth Strategy. WDC revoked this Strategy in 2015.	Support the deletion of Provision 4.2 UFD P9 – Implementing Franklin District Growth Strategy as notified.
<b>Submitter 14:</b> Waikato District Council	14.5	UFD-P12 - Density targets for Future Proof area	Support	Support the introduction of Policy 12 Density targets for the Future Proof area. This Policy and the targets align with Waikato 2070, the Waikato District Growth and Economic Development Strategy. This section has been consulted and adopted in the Future Proof Strategy 2022.	Retain as notified.
<b>Submitter 14:</b> Waikato District Council	14.6	UFD-P14 - Rural-residential development in Future Proof area	Support in part	Support with Amendment to point three to include community facilities. Where there are sizable or consolidated areas of Rural-residential development, the district has seen an increase in demand from residents to have new or additional community facilities. This takes away from providing community facilities in identified areas for urban development and puts a strain on funding.	Amend Provision 4.2 UFD-P14 – Rural-residential development in Future Proof area as follows: ..... 3. the additional demand for <u>community facilities</u> , servicing and infrastructure created by rural-residential development; ....
<b>Submitter 14:</b> Waikato District Council	14.7	UFD-P15 - Monitoring and review in the	Support	Support the need to include a policy that enables the review of the land-use pattern should the need arise so that the Regional Policy Statement does not become	Retain as notified.

Submitter	Sub point #	Provision number	Support/oppose	Submission point	Relief sought
		Future Proof area		outdated or inconsistent with City or District Planning regarding land-use development.	
<b>Submitter 14:</b> Waikato District Council	14.8	UFD-M8 - Information to support new urban development and subdivision	Support	Support the inclusion of point 15. To reference council-approved growth strategy or equivalent council-approved strategies and plans.	Retain as notified.
<b>Submitter 14:</b> Waikato District Council	14.9	UFD-M49 - Out-of-sequence or unanticipated urban development	Not stated	Amend to include The National Policy Statement for Highly Productive Land.	Amend Provision 4.2 UFD-M49 Out-of-sequence or unanticipated urban development to include provisions to give effect to the National Policy Statement for Highly Productive Land.
<b>Submitter 14:</b> Waikato District Council	14.10	UFD-M62 - Future Proof governance process for out-of-sequence or unanticipated urban development	Support	Support the inclusion of UFD-M62 in line with the Future Proof Strategy 2022.	Retain as notified.
<b>Submitter 14:</b> Waikato District Council	14.11	UFD-M63 – Housing Affordability	Support	Support the inclusion of the UFD-M63 in line with the Future Proof Strategy 2022.	Retain as notified.
<b>Submitter 14:</b> Waikato District Council	14.12	UFD-M64 – Public transport	Support	Support the inclusion of UFD-M64 in line with the Future Proof Strategy 2022.	Retain as notified.
<b>Submitter 14:</b> Waikato District Council	14.13	UFD-M65 - Blue-Green network	Support	Support the inclusion of UFD-M65 in line with the Future Proof Strategy 2022.	Retain as notified.
<b>Submitter 14:</b> Waikato District Council	14.14	UFD-PR11 - Adopting Future Proof land use pattern	Support	Support principal reason 11 as extensive engagement and consultation were undertaken under the Local Government Act on the Future Proof Settlement Pattern.	Retain as notified.

Submitter	Sub point #	Provision number	Support/oppose	Submission point	Relief sought
<b>Submitter 14:</b> Waikato District Council	14.15	UFD-PR12 - Density targets for Future Proof area	Support	Support principal reason 12 as extensive engagement and consultation were undertaken under the Local Government Act on the Future Proof Settlement Pattern.	Retain as notified.
<b>Submitter 14:</b> Waikato District Council	14.16	UFD-PR13 - Commercial development in the Future Proof area	Support	Support principal reason 13 as extensive engagement and consultation were undertaken under the Local Government Act on the Future Proof Settlement Pattern.	Retain as notified.
<b>Submitter 14:</b> Waikato District Council	14.17	UFD-PR15 - Monitoring and review in the Future Proof area	Support	Support principal reason 15 as extensive engagement and consultation were undertaken under the Local Government Act on the Future Proof Settlement Pattern.	Retain as notified.
<b>Submitter 14:</b> Waikato District Council	14.18	APP11 - Development principles	Not stated	Amend to include The National Policy Statement for Highly Productive Land.	Amend APP11 – Development principles to include provisions that will affect the National Policy Statement for Highly Productive Land.
<b>Submitter 14:</b> Waikato District Council	14.19	APP12 - Future Proof tables	Support	Support inclusion on the Strategic Industrial Nodes and Hierarchy of major commercial centres.	Retain as notified.
<b>Submitter 14:</b> Waikato District Council	14.20	APP13 - Responsive Planning Criteria – Out-of-sequence and Unanticipated Developments (Future Proof local authorities)	Support	Support the inclusion of the Out-of-sequence and Unanticipated Developments criteria.	Retain as notified.
<b>Submitter 14:</b> Waikato District Council	14.21	5.2.8 - Significant transport infrastructure maps	Support	Support the inclusion of the Significant Transport Infrastructure maps.	Retain as notified.

Submitter	Sub point #	Provision number	Support/oppose	Submission point	Relief sought
<b>Submitter 14:</b> Waikato District Council	14.22	5.2.10 - Future Proof maps (indicative only)	Support	Support the inclusion of the Future Proof maps.	Retain as notified.
<b>Submitter 15:</b> Waikato District Council (officer level)	15.1	UFD-P12 – Density targets for Future Proof area	Support in part	The Future Proof Strategy 2022 page 94 states the densities and targets in the Strategy are to be achieved 'over time'. Plan Change 1 deletes these words from the UFD-P12. Waikato District Council considers the words 'over time' need to be reinstated to be consistent with the Future Proof Strategy.	Amend Provision UFD-P12 Density targets for Future Proof area as follows:  Future proof territorial authorities shall seek to...  In doing so, development provisions shall seek to achieve <u>over time</u> the following minimum net target densities (dwellings per hectare in defined locations...  AND  Any such further, alternative or consequential relief as may be necessary to fully achieve the relief sought in the submission.
<b>Submitter 16:</b> Te Whatu Ora	16.1	General	Oppose	We wish amendment to this part. Te Tiriti o Waitangi or the Treaty of Waitangi are not mentioned at all in the document. The document lacks explicit commitment to Te Tiriti o Waitangi and provision to engage with Māori in meaningful partnerships.	The document would be strengthened by being set in a Te Tiriti framework. That is a framework which gives consideration to all parts of Te Tiriti o Waitangi including the Preamble and all the articles, including the Fourth oral article (Wairuatanga).
<b>Submitter 16:</b> Te Whatu Ora	16.2	1.9.4 - Waikato Regional Policy Statement	Support	The National Public Health Service - Te Whatu Ora Waikato recognises this Te Ture Whaimana o te Awa - the Vision and Strategy for the Waikato River as a Tiriti-based arrangement and prior agreement influencing development options in the Waikato Region. The arrangement supports both (Kāwanatanga) and Article 2 (Rangatiratanga) of Te Tiriti o Waitangi	Retain as notified.
<b>Submitter 16:</b> Te Whatu Ora	16.3	General	Not stated	Te Whatu Ora wishes to amend the PC to make Te Tiriti-based partnerships with Māori more evident than the generalised language used in NPS-UD. General reference is made to tangata whenua in a number of clauses. However, there are no specific signs of engagement with Māori in a	The document would be strengthened by being set in a Te Tiriti framework that attends to the Preamble and all the articles, including the Fourth oral article (Wairuatanga). It would be particularly pertinent to address Article 1 Kāwanatanga, the co-governance relationship, in ways that

Submitter	Sub point #	Provision number	Support/oppose	Submission point	Relief sought
				Te Tiriti-based partnership that would attend to, for example, Articles 2 (Rangatiratanga) and 4 (Wairuatanga).	reflect the original intentions of Māori when they agreed to Te Tiriti o Waitangi with the Crown.
<b>Submitter 16:</b> Te Whatu Ora	16.4	General	Not stated	Te Whatu Ora wishes to amend the PC to make Te Tiriti-based partnerships with Māori more evident than the generalised language used in NPS-UD. General reference is made to enabling Māori to express their cultural traditions and norms, values. However, there are no specific signs of engagement with Māori in a Te Tiriti-based partnership that would attend to, for example, Articles 2 (Rangatiratanga) and 4 (Wairuatanga).	The document would be strengthened by being set in a Te Tiriti framework that attends to the Preamble and all the articles, including the Fourth oral article (Wairuatanga). It would be particularly pertinent to address Article 1 Kāwanatanga, the co-governance relationship, in ways that reflect the original intentions of Māori when they agreed to Te Tiriti o Waitangi with the Crown.
<b>Submitter 16:</b> Te Whatu Ora	16.5	General	Not stated	Te Whatu Ora wishes to amend the PC to make Te Tiriti-based partnerships with Māori more evident than the generalised language used in NPS-UD. General reference is made to the aspirations of hapū and iwi. However, there are no specific signs of engagement with Māori in a Te Tiriti-based partnership that would attend to, for example, Articles 2 (Rangatiratanga) and 4 (Wairuatanga).	The document would be strengthened by being set in a Te Tiriti framework that attends to the Preamble and all the articles, including the Fourth oral article (Wairuatanga). It would be particularly pertinent to address Article 1 Kāwanatanga, the co-governance relationship, in ways that reflect the original intentions of Māori when they agreed to Te Tiriti o Waitangi with the Crown.
<b>Submitter 16:</b> Te Whatu Ora	16.6	EIT-M4 - Regional Land Transport Plan	Not stated	EIT-M4 should be strengthened by the inclusion of Iwi and/or Hapū Māori Authorities alongside Territorial Authorities in planning phases and in all urban development decisions.	Amend the provision to recognise the status of and including Iwi and/or Hapū Māori Authorities alongside Territorial Authorities in discussions, planning and decision making processes with regard to Urban Development across the Region.
<b>Submitter 16:</b> Te Whatu Ora	16.7	UFD-P12 - Density targets for Future Proof area	Not stated	UFD-P12 should be strengthened by the inclusion of Iwi and/or Hapū Māori Authorities alongside Territorial Authorities in planning phases and in all urban development decisions.	Amend the provision to recognise the status of and including Iwi and/or Hapū Māori Authorities alongside Territorial Authorities in discussions, planning and decision making processes with regard to Urban Development across the Region.
<b>Submitter 16:</b> Te Whatu Ora	16.8	UFD-M6 - Growth strategies	Not stated	UFD-M6 should be strengthened by the inclusion of Iwi and/or Hapū Māori Authorities alongside Territorial Authorities in planning phases and in all urban development decisions.	Amend the provision to recognise the status of and including Iwi and/or Hapū Māori Authorities alongside Territorial Authorities in discussions, planning and decision making processes with regard to Urban Development across the Region.

Submitter	Sub point #	Provision number	Support/oppose	Submission point	Relief sought
Submitter 16: Te Whatu Ora	16.9	UFD-M7 - Urban development planning	Not stated	UFD-M7 should be strengthened by the inclusion of Iwi and/or Hapū Māori Authorities alongside Territorial Authorities in planning phases and in all urban development decisions.	Amend the provision to recognise the status of and including Iwi and/or Hapū Māori Authorities alongside Territorial Authorities in discussions, planning and decision making processes with regard to Urban Development across the Region.
Submitter 16: Te Whatu Ora	16.10	UFD-M9 - Other party involvement	Not stated	UFD-M9 should be strengthened by the inclusion of Iwi and/or Hapū Māori Authorities alongside Territorial Authorities in planning phases and in all urban development decisions.	Amend the provision to recognise the status of and including Iwi and/or Hapū Māori Authorities alongside Territorial Authorities in discussions, planning and decision making processes with regard to Urban Development across the Region.
Submitter 16: Te Whatu Ora	16.11	UFD-M21 - Sustainability of marae and papakāinga	Not stated	UFD-M21 should be strengthened by the inclusion of Iwi and/or Hapū Māori Authorities alongside Territorial Authorities in planning phases and in all urban development decisions.	Amend the provision to recognise the status of and including Iwi and/or Hapū Māori Authorities alongside Territorial Authorities in discussions, planning and decision making processes with regard to Urban Development across the Region.
Submitter 16: Te Whatu Ora	16.12	UFD-M33 - Keeping records on development and infrastructure trends	Not stated	UFD-M33 should be strengthened by the inclusion of Iwi and/or Hapū Māori Authorities alongside Territorial Authorities in planning phases and in all urban development decisions.	Amend the provision to recognise the status of and including Iwi and/or Hapū Māori Authorities alongside Territorial Authorities in discussions, planning and decision making processes with regard to Urban Development across the Region.
Submitter 16: Te Whatu Ora	16.13	UFD-M73 - Interim arrangements for Future Proof tier 3 territorial authorities	Not stated	UFD-M73 should be strengthened by the inclusion of Iwi and/or Hapū Māori Authorities alongside Territorial Authorities in planning phases and in all urban development decisions.	Amend the provision to recognise the status of and including Iwi and/or Hapū Māori Authorities alongside Territorial Authorities in discussions, planning and decision making processes with regard to Urban Development across the Region.
Submitter 16: Te Whatu Ora	16.14	UFD-PR2 - Co-ordinating growth and infrastructure	Not stated	UFD-PR2 should be strengthened by the inclusion of Iwi and/or Hapū Māori Authorities alongside Territorial Authorities in planning phases and in all urban development decisions.	Amend the provision to recognise the status of and including Iwi and/or Hapū Māori Authorities alongside Territorial Authorities in discussions, planning and decision making processes with regard to Urban Development across the Region.
Submitter 16: Te Whatu Ora	16.15	UFD-PR11 - Adopting Future	Not stated	UFD-PR11 should be strengthened by the inclusion of Iwi and/or Hapū Māori Authorities alongside Territorial	Amend the provision to recognise the status of and including Iwi and/or Hapū Māori Authorities alongside

Submitter	Sub point #	Provision number	Support/oppose	Submission point	Relief sought
		Proof land use pattern		Authorities in planning phases and in all urban development decisions.	Territorial Authorities in discussions, planning and decision making processes with regard to Urban Development across the Region.
<b>Submitter 16:</b> Te Whatu Ora	16.16	UFD-PR18 - Tier 3 local authority areas outside the Future Proof Strategy	Not stated	UFD-PR18 should be strengthened by the inclusion of Iwi and/or Hapū Māori Authorities alongside Territorial Authorities in planning phases and in all urban development decisions.	Amend the provision to recognise the status of and including Iwi and/or Hapū Māori Authorities alongside Territorial Authorities in discussions, planning and decision making processes with regard to Urban Development across the Region.
<b>Submitter 16:</b> Te Whatu Ora	16.17	UFD-PR19 - Being responsive to significant unintended and out-of-sequence growth within tier 3 local environments	Not stated	UFD-PR19 should be strengthened by the inclusion of Iwi and/or Hapū Māori Authorities alongside Territorial Authorities in planning phases and in all urban development decisions.	Amend the provision to recognise the status of and including Iwi and/or Hapū Māori Authorities alongside Territorial Authorities in discussions, planning and decision making processes with regard to Urban Development across the Region.
<b>Submitter 16:</b> Te Whatu Ora	16.18	General	Not stated	Indigenous sites of significance and in particular Wāhi Tapu or sacred sites, need to be recognised and noted throughout the document rather than being referred to only in an appendix (APP13 - Responsive Planning Criteria – Out-of-sequence and Unanticipated Developments (Future Proof local authorities).	Māori interests regarding their ancestral land, including Wāhi Tapu sites, will be prioritised by active Tiriti-based engagement and partnerships in every part of Waikato Regional Council planning and decision-making processes. In practice for NPS-UD, this would include Iwi and/or Hapū Māori Authorities who represent mana whenua in each locality, being active partners at every level of urban development decision-making.
<b>Submitter 16:</b> Te Whatu Ora	16.19	Map 44 - Future Proof wāhi toitū and wāhi toiora areas	Not stated	Map 44: Future Proof wāhi toitū, wāhi toiora areas, while indicating some areas that maybe at risk of flooding, instability, heritage sites, etc. does not clearly indicate indigenous sites of significance in ways that are clearly recognisable. Recognition and mapping of indigenous sites of significance, for example, Wāhi Tapu sites including but not limited to Urupa, Pā, Marae, War sites, rāhui sites will strengthen the document.	Māori interests regarding their ancestral land, including Wāhi Tapu sites, will be prioritised by active Tiriti-based engagement and partnerships in every part of Waikato Regional Council planning and decision-making processes. In practice for NPS-UD, this would include Iwi and/or Hapū Māori Authorities who represent mana whenua in each locality, being active partners at every level of urban development decision-making.

Submitter	Sub point #	Provision number	Support/oppose	Submission point	Relief sought
Submitter 17: Kāinga Ora	17.1	1.6 Definitions	Support in part	The National Policy Statement for Highly Productive Land was gazetted on 17 October 2022. The definition of highly productive land should be inserted and references to high-class soils be replaced with highly productive land.	Insert new definition as follows:  <u>Highly productive land</u> Has the same meaning as in Part 1 of the National Policy Statement for Highly Productive Land 2022.
Submitter 17: Kāinga Ora	17.2	1.6 Definitions	Oppose	Kāinga Ora acknowledges that housing affordability is an issue and it is of particular concern for Kāinga Ora given the lack of housing opportunities and choice available for lower-income families in the Waikato region.  However, under the current legislation, inclusionary zoning is unlawful. Kāinga Ora do however support exploring more options to enhance affordability across the entire housing spectrum, outside of the Resource Management legislative framework, through managing the cost of land and the cost of building infrastructure.	Delete the definition for inclusionary zoning in its entirety
Submitter 17: Kāinga Ora	17.3	General	Support in part	The National Policy Statement for Highly Productive Land (NPS-HPL) was gazetted on 17 October 2022. Kāinga Ora seeks that reference to the NPS-HPL should be incorporated within the Regional Policy Statement where applicable.	Include reference to the NPS-HPL should be incorporated within the Regional Policy Statement where applicable.
Submitter 17: Kāinga Ora	17.4	SRMR-12 - Effects of Climate Change	Support	Kāinga Ora supports the directive nature of the addition of sub-point 3.	Retain as notified.
Submitter 17: Kāinga Ora	17.5	IM-09 - Amenity	Support	Kāinga Ora supports the addition of clause 2. In particular, that intensification and built development occurs whilst “recognising that amenity values change over time in response to the changing needs of people, communities and future generations, and such changes are not, of themselves, an adverse effect.”	Retain as notified.
Submitter 17: Kāinga Ora	17.6	UFD-O1 - Built Environment	Support	Kāinga Ora supports the addition of clause 12. In particular, points (b) to (f).	Retain as notified.
Submitter 17: Kāinga Ora	17.7	UFD-P1 - Planned and co-	Support in part	Kāinga Ora seeks that sub point 4 is amended to recognise the planned built environment.	1. Amend policy UFD-P1 as follows:

Submitter	Sub point #	Provision number	Support/oppose	Submission point	Relief sought
		ordinated subdivision, use and development			<p>Subdivision, use and development of the built environment, including transport, occurs in a planned and co-ordinated manner which:</p> <ol style="list-style-type: none"> <li>1. has regard to the principles in APP11;</li> <li>2. recognises and addresses potential cumulative effects of subdivision, use and development;</li> <li>3. is based on sufficient information to allow assessment of the potential long term effects of subdivision, use and development; and</li> <li>4. has regard to the <del>existing</del> <u>planned</u> built environment.</li> </ol>
<b>Submitter 17:</b> Kāinga Ora	17.8	UFD-P12 - Co-ordinating growth and infrastructure	Support in part	Kāinga Ora notes that clause (1)(d) of the policy does not align with the NPS-UD and is overly restrictive and seeks that it is amended to align with the NPS-UD.	Amend UFD-P2 (1)(d): (d) ensure new development <del>does not occur until provision for appropriate infrastructure necessary to service the development is in place is</del> <u>appropriately serviced.</u>
<b>Submitter 17:</b> Kāinga Ora	17.9	UFD-P12 - Density targets for Future Proof area	Support in part	<p>Kāinga Ora supports the additions of sub-points 2 and 4-9, in particular implementing the policies of the NPS-UD. Whilst Kāinga Ora would prefer the density targets to only include minimum targets, and not a range which includes maximum targets (which in turn become an ultimate target), Kāinga Ora notes that the density targets have been extracted from the Future Proof Strategy. Kāinga Ora therefore strongly supports the addition of the supplementary wording:</p> <p>“To the extent that requirements in UFD-P12 above may result in a higher density for certain areas than the density identified in the table below, those higher densities shall prevail.”</p> <p>Kāinga Ora do however seek that the policy heading and the table should also carry through the wording from the policy text and be labelled ‘Minimum Density targets for Future Proof area’ and ‘minimum net target densities’.</p>	<ol style="list-style-type: none"> <li>1. Amend the Policy heading as follows: UFD-P12 – <u>Minimum</u> Density targets for Future Proof area</li> <li>2. Amend the table as follows: <ol style="list-style-type: none"> <li>1. <u>Minimum</u> Net target densities (dwellings per hectare) to be achieved in defined locations</li> </ol> </li> </ol>

Submitter	Sub point #	Provision number	Support/oppose	Submission point	Relief sought
Submitter 17: Kāinga Ora	17.10	UFD-P18 - Tier 3 local authority areas outside the Future Proof Strategy	Support in part	Kāinga Ora supports the inclusion of guidance for new urban development for tier 3 local authorities outside of the Future Proof Strategy, however considers clause 1 is unnecessary in directing how urban development is managed given those matters outlined in clauses 2-9 should be directing any future growth strategy adopted by the council. Noting UFD-M69 provides the necessary guidance for such a growth strategy.	Amend the policy as follows: ... New urban development in tier 3 local authority areas shall be managed in a way that: <ol style="list-style-type: none"> <li>1. <del>recognises and provides for the intended urban development pattern as set out in any agreed council approved growth strategy or equivalent council approved strategies and plans;</del></li> <li>2. contributes towards sufficient development capacity required to meet expected demand for housing and for business land over the short term, medium term, and long term as set out in the National Policy Statement on Urban Development;...</li> </ol>
Submitter 17: Kāinga Ora	17.11	UFD-M49 - Out-of-sequence or unanticipated development	Support	Kāinga Ora supports the clear directive of UFD-M49	Retain as notified.
Submitter 17: Kāinga Ora	17.12	UFD-M63 - Housing Affordability	Support in part	Kāinga Ora supports UFD-M63. In particular the inclusion of examples of how housing affordability can be improved.  Kāinga Ora acknowledges that housing affordability is an issue and it is of particular concern for Kāinga Ora given the lack of housing opportunities and choice available for lower-income families in the Waikato region. However, under the current legislation, inclusionary zoning is unlawful. Kāinga Ora do however support exploring more options to enhance affordability across the entire housing spectrum, outside of the Resource Management legislative framework, through managing the cost of land and the cost of building infrastructure	Amend UFD-M63 as follows:  Future Proof partners should consider regulatory and non-regulatory methods to improve housing affordability such as increasing housing supply, greater housing choice, more diverse dwelling typologies, <u>and</u> alternative delivery partners <del>and investigating inclusionary zoning.</del>
Submitter 17: Kāinga Ora	17.13	UFD-M65 - Blue-Green Network	Support in part	Kāinga Ora supports the development of a sub-regional blue-green network strategy, but seeks that the method reflects that higher densities are considered along these networks within urban environments to offset the loss of	Amend UFD-M65 as follows:  <u>7. Recognise that higher density residential development should co-locate adjacent to these networks within urban</u>

Submitter	Sub point #	Provision number	Support/oppose	Submission point	Relief sought
				land to these networks, but in turn recognising open space benefits higher density living by providing outlook and amenity	<u>environments to realise the benefits open space has on higher density living by providing outlook and amenity.</u>
<b>Submitter 17:</b> Kāinga Ora	17.14	UFD-M52 - Infill targets	Support in part	Kāinga Ora considers that a minimum target of 50% of growth to be through infill and intensification within the Hamilton existing urban areas is too low. Kāinga Ora seeks that brownfield intensification is prioritised in line with the NPS-UD and seeks this minimum is increased to 70%	Amend UFD-M52 as follows: Hamilton City Council should aim for at least <del>50</del> <u>70</u> per cent of growth to be through infill and intensification of existing urban areas. Waikato and Waipā District Councils should aim for 90 per cent of growth to be within identified urban enablement areas and village enablement areas and at least 20 per cent of growth within urban environments to be within existing parts of the townships, preferably in areas close to centres and current and future public transport stops.
<b>Submitter 17:</b> Kāinga Ora	17.15	UFD-M66 - Changing amenity values within urban environments	Support	Kāinga Ora supports that this methodology recognises that amenity values within development locations change over time.	Retain as notified.
<b>Submitter 17:</b> Kāinga Ora	17.16	UFD-M69 - Council approved growth strategy or equivalent in tier 3 local authority areas	Support	Kāinga Ora supports this methodology consistent with submission point 10.	Retain as notified.
<b>Submitter 17:</b> Kāinga Ora	17.17	UFD-M71 - Housing Affordability	Support in part	Kāinga Ora supports UFD-M71 in part. Kāinga Ora acknowledges that housing affordability is an issue and it is of particular concern for Kāinga Ora given the lack of housing opportunities and choice available for lower-income families in the Waikato region. However, under the current legislation, inclusionary zoning is unlawful. Kāinga Ora do however support exploring more options to enhance affordability across the entire housing spectrum, outside of the Resource Management legislative	Amend UFD-M71 as follows: Where there is evidence that there is a housing affordability issue in the local authority area, tier 3 local authorities should consider regulatory and nonregulatory methods to improve housing affordability, <del>including investigating inclusionary zoning.</del>

Submitter	Sub point #	Provision number	Support/oppose	Submission point	Relief sought
				framework, through managing the cost of land and the cost of building infrastructure	
<b>Submitter 17:</b> Kāinga Ora	17.18	UFD-M74 - Tier 3 out-of-sequence or unanticipated development	Support	Consistent with this submission, Kāinga Ora supports the direct and clear methodology provided to tier 3 out-of-sequence or unanticipated development	Retain as notified.
<b>Submitter 17:</b> Kāinga Ora	17.19	UFD-PR3 – Marae and papakāinga	Support	Kāinga Ora supports the additions to this principal reason which acknowledges that papakāinga can be located within both urban and rural areas and including the enablement of papakāinga and supporting services within district plans.	Retain as notified.
<b>Submitter 17:</b> Kāinga Ora	17.20	APP13 – Responsive Planning Criteria – Out-of-sequence and Unanticipated Developments (Future Proof local authorities)	Support	Kāinga Ora supports the directive and clear requirements for out of sequence and unanticipated developments for Future Proof local authorities.	Retain as notified.
<b>Submitter 17:</b> Kāinga Ora	17.21	APP14 – Responsive Planning Criteria – Out-of-sequence and Unanticipated Developments (Non-Future Proof tier 3 local Authorities)	Support	Kāinga Ora supports the directive and clear requirements for out of sequence and unanticipated developments for non-Future Proof tier 3 local authorities.	Retain as notified.
<b>Submitter 18:</b> Waitoa Industrial Estate Limited	18.1	UFD-P18 - Tier 3 local authority areas outside	Not stated	WIEL's submission is that the changes to the WRPS do not adequately recognise and provide for the development and/or expansion of existing recognised industrial nodes within rural areas. This type of development is not	Either: 1. WIEL seek that it is made clear within the WRPS that development and expansion of existing rural industrial nodes that are identified in District Plans

Submitter	Sub point #	Provision number	Support/oppose	Submission point	Relief sought
		the Future Proof Strategy		adequately captured by the proposed changes to the WRPS, provision UFD-P18 which is focused on urban development in and around existing settlements. Existing businesses such as WIEL's are not considered to comprise an urban 'settlement'.	<p>do not constitute 'urban development' and are not therefore subject to the Proposed WRPS provisions for urban form and development.</p> <ol style="list-style-type: none"> <li>In the alternative, WIEL seek that additional clauses are included in UFD-P18 to explicitly recognise and provide for the development and expansion of existing rural industrial nodes that are identified in District Plans.</li> <li>Any alternative and/or consequential amendments to the same effect as the primary relief sought above.</li> </ol>
<b>Submitter 18:</b> Waitoa Industrial Estate Limited	18.2	UFD-P19 – Being responsive to significant unintended and out-of-sequence growth within tier 3 local environments	Not stated	WIEL's submission is that the changes to the WRPS do not adequately recognise and provide for the development and/or expansion of existing recognised industrial nodes within rural areas. This type of development is not adequately captured by the proposed changes to the WRPS, provision UFD-P19 which is focused on urban development in and around existing settlements. Existing businesses such as WIEL's are not considered to comprise an urban 'settlement'.	<p>Either:</p> <ol style="list-style-type: none"> <li>WIEL seek that it is made clear within the WRPS that development and expansion of existing rural industrial nodes that are identified in District Plans do not constitute 'urban development' and are not therefore subject to the Proposed WRPS provisions for urban form and development.</li> <li>In the alternative, WIEL seek that additional clauses are included in UFD-P19 to explicitly recognise and provide for the development and expansion of existing rural industrial nodes that are identified in District Plans.</li> <li>Any alternative and/or consequential amendments to the same effect as the primary relief sought above.</li> </ol>
<b>Submitter 19:</b> Fonterra Limited	19.1	APP12 - Future Proof Tables	Oppose in part	<p>Fonterra supports any zoning or other identification of industrial land uses around their sites, as these are 'compatible' land uses which reduces potential for reverse sensitivity effects which may limit, restrict or provide opposition to further growth.</p> <p>Fonterra opposes any amendments to the RPS which reduce the recognition of their sites, and the areas in which they are located, as 'Strategic Industrial Nodes' (or similar</p>	<p>Retain recognition of Te Rapa North, Hautapu and Horotiu as a 'Strategic Industrial Node' within the RPS.</p> <p>Ensure that there is compatible land use zoning in proximity to Fonterra's established sites.</p> <p>Or any alternative relief which achieves the same or similar outcome as set out above.</p>

Submitter	Sub point #	Provision number	Support/oppose	Submission point	Relief sought
				weighting), and / or which supports growth and development of incompatible land uses in proximity to their sites.  Fonterra opposes any amendments to the RPS that would increase the risk for land use incompatibility and the potential for reverse sensitivity effects to arise.	
<b>Submitter 19:</b> Fonterra Limited	19.2	UPD-P11 - Adopting Future Proof land use pattern	Support in part	Fonterra generally supports UFD-P11, however it is concerned that the proposed wording elevates the status of FDSs above what the NPS-UD anticipates for them (being that they are had regard to by councils in their planning decisions)	Retain UFD-P11 but amend as follows:  2. new residential (including rural-residential) development shall be managed <u>having regard to in accordance with the timing indicated on Map 43 (5.2.10 Future Proof map (indicative only)) or in accordance with the timing provided for</u> within an operative Future Development Strategy for the Future Proof sub-region in accordance with the National Policy Statement on Urban Development 2020);
<b>Submitter 19:</b> Fonterra Limited	19.3	Map 43: Future Proof indicative urban and village enablement areas	Support in part	Fonterra partially supports retaining Map 43. However, Fonterra is concerned the map is not legible and does not adequately inform Policy UFD-P11.2.  Map 43 is not at a scale (or able to be enlarged) and does not give property owners any certainty as to where the boundaries of urban and village enablement areas are.  Under Policy UFD-P11.2, residential development must be managed in accordance with the timing on Map 43. While there are some timings indicated, these do not specify the type of land use / development to occur. For example, it would be inappropriate to encourage residential development around existing industrial areas. Map 43 does not provide this level of detail (and it should).	Retain Map 43, with the following improvements: <ul style="list-style-type: none"> <li>• Improve legibility so that individual properties can be identified;</li> <li>• Clarify whether areas are currently residential or industrial areas and whether they are designed to support further residential or industrial development</li> </ul>
<b>Submitter 20:</b> Taupo District Council	20.1	1.6 Definitions	Oppose	Rural lifestyle Zone development should not be included in the definition of 'rural-residential development'.	Remove 'this includes rural lifestyle zone developments' from the rural-residential development definition

Submitter	Sub point #	Provision number	Support/oppose	Submission point	Relief sought
				Rural lifestyle in the Taupo context refers to larger properties of at least 2ha which are located approximately 15mins from Taupo. These types of developments should not be precluded to achieve the objectives of the NPSUD.	Residential development in rural areas which is predominantly for residential activity and is not ancillary to a rural or agricultural use. <del>This includes rural lifestyle zone developments</del>
<b>Submitter 20:</b> Taupo District Council	20.2	UFD-M69 – Council-approved growth strategy or equivalent in tier 3 local authority areas	Oppose	<p>Taupo District Council seeks that the timeframe to notify a new or updated council-approved growth strategy within two years of the operative date of Plan Change 1 is amended.</p> <p>The proposed two-year timeframe may or may not be appropriate in the context of the reforms of the Resource Management Act. The proposed Bills are simply too new, and we have not had the opportunity to understand their implications for the timing of work. We can see that there is value in the Regional Policy Statement setting out a timeframe for implementation, however we would like to reserve the right to further discuss what an appropriate timeframe would be as our understanding of the Government reforms develops.</p>	<p>Tier 3 local authorities shall prepare a new or updated council-approved growth strategy, or equivalent council approved plans and strategies, to manage growth in accordance with UFD-P18</p> <p>The growth strategy or equivalent council-approved plans and strategies must be notified <u>by a date agreed to between the local authority and the Regional Council within two years of either the operative date of Plan Change 1 or a date at which a council determine that it is a tier 3 local authority, and must address .....</u></p>
<b>Submitter 20:</b> Taupo District Council	20.3	UFD-P18 - Tier 3 local authority areas outside the Future Proof Strategy	Oppose	<p>The NPS-UD relates to urban environments and, through the objectives and policies, seeks to ensure that they are well-functioning through effective and integrated planning. It outlines how Regional Policy Statements and District Plans should enable more people to live in these areas. Our view is that achieving the NPS objectives does not require councils to preclude rural lifestyle zone development. However, we are concerned that UFD-P18(4) may be interpreted as doing exactly that.</p> <p>We are generally supportive of UFD-P18, and even the general intent of (4), however we do not support the inclusion of existing Rural Lifestyle areas.</p>	<p>Seeks that UFD-P18 (4). is removed or alternatively that (4) Is amended to read as follows:</p> <p>prevents a dispersed pattern of settlement and the resulting inefficiencies in managing resources that would arise from <u>new areas of</u> urban and rural residential development being located in the rural environment outside of identified urban growth areas;</p>
<b>Submitter 20:</b> Taupo District Council	20.4	SRMR-14 - Managing the	Support in part	The difficulties involved in developing multiple owned Māori land remain a real and significant barrier for many whānau. In most cases such land is not able to be	New issue statement:

Submitter	Sub point #	Provision number	Support/oppose	Submission point	Relief sought
		Built environment		subdivided like free hold title. Treating Māori owned land in the same manner as free hold title would not recognise these differences in tenure and ability to access finances. It would also not recognise and provide for the relationship of Māori with their ancestral lands, or recognise forms of settlement which best provide for the social, economic and cultural wellbeing of Māori.	<u>Historical and existing restrictions on the use of Māori land have made it difficult for Māori to develop and occupy their ancestral lands.</u>
<b>Submitter 20:</b> Taupo District Council	20.5	UFD-O1 - Managing the Urban Environment	Support in part	<p>While the plan change has reference to “enabling Māori to express their cultural traditions and norms ...” there is nothing that explicitly recognises and provides for the relationship of Māori and their culture and traditions with their ancestral lands as required by Section 6(e) of the Act. In our view, this includes recognition of the importance of papakāinga as a way for Māori to occupy and better connect with their ancestral lands.</p> <p>The location of papakāinga is dependent on the location of Māori land. That land may be in or outside of identified growth areas and is often within rural areas. In a lot of cases there is little to no choice for whanau on where they establish papakāinga.</p>	<p>New Objective:</p> <p><u>Provide for the establishment of papakāinga on Māori land where it is located throughout the region</u></p>
<b>Submitter 20:</b> Taupo District Council	20.6	Policy 6.1 - Planned and co-ordinated subdivision, use and development	Support in part	<p>While there is reference to “...enabling Māori to express their cultural traditions and norms...” within the proposed changes to the RPS, there is nothing that explicitly recognises and provides for the relationship of Māori and their culture and traditions with their ancestral lands as required by Section 6(e) of the Act.</p> <p>In our view, this includes recognition of the importance of papakāinga as a way for Māori to occupy and better connect with their ancestral lands. As per the revised definition in the Taupō District Plan (provided in the table below), papakāinga is more than just housing and will include other activities. These activities will facilitate the development of resilient communities on ancestral lands.</p>	<p>New Policy:</p> <p><u>Recognise and provide for the social and cultural benefits of the development of papakāinga on Māori land.</u></p>

Submitter	Sub point #	Provision number	Support/oppose	Submission point	Relief sought
Submitter 20: Taupo District Council	20.7	Policy 6.1 - Planned and co-ordinated subdivision, use and development	Support in part	<p>The difficulties involved in developing multiple owned Māori land remains a real and significant barrier for many whānau. In most cases such land is not able to be subdivided like free hold title. Treating Māori owned land in the same manner as free hold title would not recognise these differences in tenure and ability to access finances. It would also not recognise and provide for the relationship of Māori with their ancestral lands, or recognise forms of settlement which best provide for the social, economic and cultural wellbeing of Māori.</p> <p>The location of papakāinga is dependent on the location of Māori land. That land may be in or outside of identified growth areas and is often within rural areas. In a lot of cases there is little to no choice for whanau on where they establish papakāinga.</p>	<p>New Implementation Method: <u>Local authorities should support iwi and whanau to develop papakāinga on their ancestral lands. This will include where papakāinga are proposed to be developed outside of identified growth areas, are out of sequence or at a density or scale greater than surrounding land uses.</u></p>
Submitter 20: Taupo District Council	20.8	UFD-P18 - Tier 3 local authority areas outside the Future Proof Strategy	Support in part	<p>While the plan change has reference to “enabling Māori to express their cultural traditions and norms ...” there is nothing that explicitly recognises and provides for the relationship of Māori and their culture and traditions with their ancestral lands as required by Section 6(e) of the Act. In our view, this includes recognition of the importance of papakāinga as a way for Māori to occupy and better connect with their ancestral lands.</p> <p>The location of papakāinga is dependent on the location of Māori land. That land may be in or outside of identified growth areas and is often within rural areas. In a lot of cases there is little to no choice for whanau on where they establish papakāinga.</p>	<p>New policy as follows: <u>Enables the development of papakāinga on Māori land.</u></p>
Submitter 20: Taupo District Council	20.9	APP11 – Development principles	Support in part	<p>While the plan change has reference to “enabling Māori to express their cultural traditions and norms ...” there is nothing that explicitly recognises and provides for the relationship of Māori and their culture and traditions with</p>	<p>New principle as follows: <u>Enable the development of papakāinga on Māori land.</u></p>

Submitter	Sub point #	Provision number	Support/oppose	Submission point	Relief sought
				<p>their ancestral lands as required by Section 6(e) of the Act. In our view, this includes recognition of the importance of papakāinga as a way for Māori to occupy and better connect with their ancestral lands.</p> <p>The location of papakāinga is dependent on the location of Māori land. That land may be in or outside of identified growth areas and is often within rural areas. In a lot of cases there is little to no choice for whanau on where they establish papakāinga.</p>	
<b>Submitter 20:</b> Taupo District Council	20.10	APP11 – Development principles	Support in part	<p>While the plan change has reference to “enabling Māori to express their cultural traditions and norms ...” there is nothing that explicitly recognises and provides for the relationship of Māori and their culture and traditions with their ancestral lands as required by Section 6(e) of the Act. In our view, this includes recognition of the importance of papakāinga as a way for Māori to occupy and better connect with their ancestral lands.</p> <p>The location of papakāinga is dependent on the location of Māori land. That land may be in or outside of identified growth areas and is often within rural areas. In a lot of cases there is little to no choice for whanau on where they establish papakāinga.</p>	<p>New principle specific to rural-residential development as follows: <u>Recognise the importance of enabling Māori to occupy their ancestral lands.</u></p>
<b>Submitter 20:</b> Taupo District Council	20.11	APP13 - Responsive Planning Criteria - Out-of-sequence and Unanticipated Developments (Future Proof local authorities)	Support in part	<p>While the plan change has reference to “enabling Māori to express their cultural traditions and norms ...” there is nothing that explicitly recognises and provides for the relationship of Māori and their culture and traditions with their ancestral lands as required by Section 6(e) of the Act. In our view, this includes recognition of the importance of papakāinga as a way for Māori to occupy and better connect with their ancestral lands.</p> <p>The location of papakāinga is dependent on the location of Māori land. That land may be in or outside of identified</p>	<p>New principle under Criteria A as follows: <u>That the development is a papakāinga development on Māori land</u></p>

Submitter	Sub point #	Provision number	Support/oppose	Submission point	Relief sought
				growth areas and is often within rural areas. In a lot of cases there is little to no choice for whanau on where they establish papakāinga.	
<b>Submitter 20:</b> Taupo District Council	20.12	1.8 Glossary	Support in part	<p>While the plan change has reference to “enabling Māori to express their cultural traditions and norms ...” there is nothing that explicitly recognises and provides for the relationship of Māori and their culture and traditions with their ancestral lands as required by Section 6(e) of the Act. In our view, this includes recognition of the importance of papakāinga as a way for Māori to occupy and better connect with their ancestral lands.</p> <p>The location of papakāinga is dependent on the location of Māori land. That land may be in or outside of identified growth areas and is often within rural areas. In a lot of cases there is little to no choice for whanau on where they establish papakāinga.</p>	<p>Amend the definition of Papakāinga as follows:</p> <p><u>Any dwelling or dwellings and associated social (including health), cultural and economic activities on Māori land which is owned by the whanau, hapū or iwi, that enables the occupation of that land by members of the same whanau, hapū or iwi. Māori land is within the meaning of Section 129 (1) (a, b or c) of the Te Ture Whenua Māori Land Act 1993, and is consistent with any license to occupy Māori land that has been issued by the Māori Land Court</u></p>
<b>Submitter 21:</b> Ministry of Education	21.1	UFD-O1 - Built Environment	Support in part	The Ministry requests the following amendments to enable ‘additional infrastructure’ which includes educational facilities. This will ensure schools and educational facilities are provided for as well as other infrastructure.	<p>UFD-O1 – Built environment</p> <p>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:</p> <p>...</p> <p>12. strategically planning for growth and development to create responsive and well-functioning urban environments, that:</p> <p>...</p> <p>d. Ensure sufficient development capacity, supported by integrated infrastructure provision, <u>including additional infrastructure</u>, for identified <u>community</u>, housing and business needs in the short, medium and long term;</p>
<b>Submitter 21:</b> Ministry of Education	21.2	UFD-P2 - Co-ordinating	Support in part	The Ministry requests the following amendments to enable ‘additional infrastructure’ which includes educational	UFD-P2 – Co-ordinating growth and infrastructure Management of the built environment ensures:

Submitter	Sub point #	Provision number	Support/oppose	Submission point	Relief sought
		growth and infrastructure		facilities. This will ensure schools and educational facilities are provided for as well as other infrastructure.	1. the nature, timing and sequencing of new development is coordinated with the development, funding, implementation and operation of transport and other infrastructure, <u>including additional infrastructure</u> , in order to: ...
<b>Submitter 21:</b> Ministry of Education	21.3	UFD-P14 - Rural-residential development in Future Proof area	Support in part	The Ministry requests the following amendments to enable 'additional infrastructure' which includes educational facilities. This will ensure schools and educational facilities are provided for as well as other infrastructure	UFD-P14 – Rural-residential development in Future Proof area  Management of rural-residential development in the Future Proof area will recognise the particular pressure from, and address the adverse effects of, rural-residential development in parts of the sub-region, and particularly in areas within easy commuting distance of Hamilton and: ... 2. the high potential for conflicts between rural-residential development and existing and planned infrastructure, <u>including additional infrastructure</u> , and land use activities; 3. the additional demand for servicing and infrastructure, <u>including additional infrastructure</u> , created by rural-residential development; ....
<b>Submitter 21:</b> Ministry of Education	21.4	UFD-P18 - Tier 3 local authority areas out the Future Proof Strategy	Support in part	The Ministry requests the following amendments to enable 'additional infrastructure' which includes educational facilities. This will ensure schools and educational facilities are provided for as well as other infrastructure.	UFD-P18 – Tier 3 local authority areas outside the Future Proof Strategy New urban development in tier 3 local authority areas shall be managed in a way that: ... 6. ensures that any development is efficient, consistent with, and supported by, appropriate infrastructure, <u>including additional infrastructure</u> , necessary to service the area; ...
<b>Submitter 21:</b> Ministry of Education	21.5	1.6 Definitions	Not stated	The definition is from the NPS-UD and includes educational facilities. This will enable a wider category of infrastructure to be captured by inclusions of the definition within the	<u>Additional infrastructure means:</u> a. <u>Public open space.</u>

Submitter	Sub point #	Provision number	Support/oppose	Submission point	Relief sought
				provisions of the plan and will be consistent with the NPS-UD wording.	<p>b. <u>Community infrastructure as defined in section 197 of the Local Government Act 2002.</u></p> <p>c. <u>Land transport (as defined in the Land Transport Management Act 2003) that is not controlled by local authorities.</u></p> <p>d. <u>Social infrastructure, such as schools and healthcare facilities.</u></p> <p>e. <u>A network operated for the purpose of telecommunications (as defined in section 5 of the Telecommunications Act 2001).</u></p> <p>f. <u>A network operated for the purpose of transmitting or distributing electricity or gas.</u></p>
<b>Submitter 21:</b> Ministry of Education	21.6	APP13 - Responsive Planning Criteria - Out-of-sequence and Unanticipated Developments (Future Proof local authorities)	Support in part	Education facilities are a key part of the social infrastructure that supports development. Adding specific reference to education facilities provides for their recognition as community hubs which should be accessible for communities, with a focus on active mode access to these facilities.	<p>Criteria A</p> <p>...</p> <p>D. That the development has good accessibility for all people between housing, jobs, <u>educational facilities</u>, community services, natural spaces, and open spaces, including by way of public or active transport.</p>
<b>Submitter 21:</b> Ministry of Education	21.7	APP13 - Responsive Planning Criteria - Out-of-sequence and Unanticipated Developments (Future Proof local authorities)	Support in part	For the sake of clarity where infrastructure is referred to in a provision, the Ministry requests that this provision is amended to add the term 'additional infrastructure'. Adding the consideration of 'additional infrastructure' to Appendix 13 allows the Ministry and other providers of additional infrastructure to be considered and provided for in the any out of sequence or unanticipated developments.	Consequential amendments as described.
<b>Submitter 21:</b> Ministry of Education	21.8	APP14 – Responsive Planning Criteria – Out-of-sequence and	Support in part	For the sake of clarity where infrastructure is referred to in a provision, the Ministry requests that this provision is amended to add the term 'additional infrastructure'. Adding the consideration of 'additional infrastructure' to Appendix 14 allows the Ministry and other providers of	Consequential amendments as described

Submitter	Sub point #	Provision number	Support/oppose	Submission point	Relief sought
		Unanticipated Developments (Non-Future Proof tier 3 local authorities)		additional infrastructure to be considered and provided for in the any out of sequence or unanticipated developments.	
<b>Submitter 22:</b> Hamilton City Council	22.1	1.6 Definitions	Support in part	There is an opportunity to expand the definition for Inclusionary zoning in this section which should look at monetary as well a land contributions, depending on threshold or trigger determined.	A type of district plan provision which requires a certain proportion of new residential development ( <u>either in the form of land and or financial contribution</u> ) to be provided as affordable housing and retained as affordable for future generations.
<b>Submitter 22:</b> Hamilton City Council	22.2	1.6 Definitions	Support in part	The National Policy Statement for Highly Productive Land commenced on 17 October 2022. The definition of highly productive land should be inserted and references to high class soils be replaced with highly productive land (see points below).	<b>Highly productive land</b> <u>means land that has been mapped in accordance with clause 3.4 and is included in an operative regional policy statement as required by clause 3.5 (but see clause 3.5(7) for what is treated as highly productive land before the maps are included in an operative regional policy statement and clause 3.5(6) for when land is rezoned and therefore ceases to be highly productive land)</u>
<b>Submitter 22:</b> Hamilton City Council	22.3	1.6 Definitions	Support in part	Add new definition for LUC 1, 2, or 3 Land.	<b>LUC 1, 2, or 3 land</b> <u>means land identified as Land Use Capability Class 1, 2, or 3, as mapped by the New Zealand Land Resource Inventory or by any more detailed mapping that uses the Land Use Capability classification.</u>
<b>Submitter 22:</b> Hamilton City Council	22.4	1.9 Te Ture Whaimana o Te Awa o Waikato - Vision and Strategy for the Waikato River	Support	Hamilton City Council supports the amendments to 1.9.	Retain as notified.
<b>Submitter 22:</b> Hamilton City Council	22.5	1.10 National policy statements and the New Zealand Coastal	Support in part	The National Policy Statement for Highly Productive Land commenced on 17 October 2022. This should be listed as a National Policy Statement in the table.	Include reference to the National Policy Statement for Highly Productive Land 2022.

Submitter	Sub point #	Provision number	Support/oppose	Submission point	Relief sought
		Policy Statement			
<b>Submitter 22:</b> Hamilton City Council	22.6	SRMR-I2 - Effects of climate change	Support	Hamilton City Council supports the amendments to SRMR-I2.	Retain as notified.
<b>Submitter 22:</b> Hamilton City Council	22.7	SRMR-I4 - Managing the Built Environment	Support	Hamilton City Council supports the amendments to SRMR-I4.	Retain as notified.
<b>Submitter 22:</b> Hamilton City Council	22.8	SRMR-PR2 - Effects of Climate Change	Support in part	Hamilton City Council supports the amendments to SRMR-PR2.	Retain as notified.
<b>Submitter 22:</b> Hamilton City Council	22.9	SRMR-PR4 - Managing the Built Environment	Support	Hamilton City Council supports the amendments to SRMR-P4.	Retain as notified.
<b>Submitter 22:</b> Hamilton City Council	22.10	IM-O5 - Adapting to Climate Change	Support	Hamilton City Council supports the amendments to IM-O5.	Retain as notified.
<b>Submitter 22:</b> Hamilton City Council	22.11	IM-O9 - Amenity	Support	Hamilton City Council supports the amendments to IM-O9.	Retain as notified.
<b>Submitter 22:</b> Hamilton City Council	22.12	EIT-M4 - Regional Land Transport Plan	Support	Hamilton City Council supports the amendments to EIT-M4	Retain as notified
<b>Submitter 22:</b> Hamilton City Council	22.13	UFD-O1 - Built Environment	Support	Hamilton City Council supports the amendments to UFD-O1	Retain as notified.
<b>Submitter 22:</b> Hamilton City Council	22.14	UFD-P10 - Governance collaboration in the Future Proof area	Support	Hamilton City Council supports the amendments to UFD-P10	Retain as notified.

Submitter	Sub point #	Provision number	Support/oppose	Submission point	Relief sought
Submitter 22: Hamilton City Council	22.15	UFD-P11 - Adapting Future Proof land use pattern	Support in part	Point 7 should also refer to FDS development for alignment with out-of-sequence or unanticipated development.	7. .... and particular regard shall be had to the proposed development capacity only where the local authority determines that the urban development proposal is significant, by assessing the proposal for consistency with the <u>relevant adopted FDS</u> and responsive planning criteria in APP13; and
Submitter 22: Hamilton City Council	22.16	UFD-P12 - Density targets for Future Proof land use pattern	Support in part	NPS-UD Policy 3 encourages Central City to deliver as much building capacity as possible. 50dph has been in place for 10 years and given Plan Change 12 and MDRS requirements is low for central city. Furthermore, Stage 1 area now prioritises central city for infrastructure delivery. Propose changes to 100-200 dph for central city to better give effect to sub point 5. <b>enable building heights and density of urban form to realise as much development capacity as possible</b> to maximise benefits of intensification within city centre zones unless modified to accommodate a qualifying matter;	Hamilton Central City Area <u>100-200</u>  (Net target densities (dwellings per hectare) to be achieved in defined locations)
Submitter 22: Hamilton City Council	22.17	UFD-P13 - Commercial development in the Future Proof area	Support	Hamilton City Council supports the amendment to UFD-P13.	Retain as notified.
Submitter 22: Hamilton City Council	22.18	UFD-P14 - Rural-residential in the Future Proof area	Support in part	The National Policy Statement for Highly Productive Land commenced on 17 October 2022. Policy 6 of the National Policy Statement states that the rezoning and development of highly productive land for rural lifestyle is to be avoided except as provided for in the policy statement. This policy should be updated to reflect this.	Insert new provision as follows and renumber subsequent provisions: <b><u>Avoid rezoning or developing highly productive land for rural lifestyle except as provided for in the National Policy Statement for Highly Productive Land 2022.</u></b>
Submitter 22: Hamilton City Council	22.19	UFD-P15 - Monitoring and review development in the Future Proof area	Support	Hamilton City Council supports the amendment to UFD-P15.	Retain as notified.

Submitter	Sub point #	Provision number	Support/oppose	Submission point	Relief sought
Submitter 22: Hamilton City Council	22.20	UFD-P18 - Tier 3 local authority areas outside the Future Proof Strategy	Support in part	The National Policy Statement for Highly Productive Land commenced on 17 October 2022. This provision should be amended to reflect this higher order document.	Amend as follows: 8. recognises environmental attributes or constraints to development and addresses how they will be avoided or managed including those specifically identified in UFD-M8, <u>highly productive land as required by the National Policy Statement on Highly Productive Land 2022 as identified in LF-M41</u> , and planning in the coastal environment as set out in CE-M1
Submitter 22: Hamilton City Council	22.21	UFD-P19 - Being responsive to significant unintended and out-of-sequence growth within tier 3 local environments	Support	Hamilton City Council supports the amendment to UFD-P19.	Retain as notified.
Submitter 22: Hamilton City Council	22.22	UFD-M7 - Urban development planning	Support	Hamilton City Council supports the amendment to UFD-M7.	Retain as notified.
Submitter 22: Hamilton City Council	22.23	UFD-M8 - Information to support new urban development and subdivision	Support in part	The National Policy Statement for Highly Productive Land commenced on 17 October 2022. This provision should be amended to reflect this higher order document and to recognise that the highly productive land definition is wider in scope than the WRPS definition of high-class soils.	Amend as follows: 4. how existing values, and valued features of the area (including amenity, landscape, natural character, ecological and heritage values, water bodies, <u>highly productive land</u> <del>high class soils</del> and significant view catchments) will be managed
Submitter 22: Hamilton City Council	22.24	UFD-M33 - Keeping records on development and infrastructure trends	Support	Hamilton City Council supports the amendment to UFD-M33.	Retain as notified.
Submitter 22: Hamilton City Council	22.25	UFD-M44 - Resourcing implementation	Support	Hamilton City Council supports the amendment to UFD-M44.	Retain as notified.

Submitter	Sub point #	Provision number	Support/oppose	Submission point	Relief sought
		in the Future Proof area			
<b>Submitter 22:</b> Hamilton City Council	22.26	UFD-M45 - Consultation between governance agencies in the Future Proof area	Support	Hamilton City Council supports the amendment to UFD-M45.	Retain as notified.
<b>Submitter 22:</b> Hamilton City Council	22.27	UFD-M46 - Implementation protocols in the Future Proof area	Support	Hamilton City Council supports the amendment to UFD-M46.	Retain as notified.
<b>Submitter 22:</b> Hamilton City Council	22.28	UFD-M61 - Interim arrangements for tier 3 local authorities	Support	Hamilton City Council supports the amendment to UFD-M61.	Retain as notified.
<b>Submitter 22:</b> Hamilton City Council	22.29	UFD-M47 - District plan provisions to implement the Future Proof land use pattern	Support	Hamilton City Council supports the amendment to UFD-M47.	Retain as notified.
<b>Submitter 22:</b> Hamilton City Council	22.30	UFD-M49 - Criteria for alternative land release in the Future Proof out-of-sequence or unanticipated urban development	Support in part	The National Policy Statement for Highly Productive Land commenced on 17 October 2022. This provision should be amended to reflect this higher order document to ensure that it is appropriately considered in applications for out-of-sequence or unanticipated urban development	Insert new provision as follows and renumber subsequent provisions:  <u>1. The land is not highly productive land, or if it is highly productive land:</u> <u>a. The urban zoning is required to provide sufficient development capacity to meet demand for housing or business land to give effect to the National Planning Statement on Urban Development 2020; and</u>

Submitter	Sub point #	Provision number	Support/oppose	Submission point	Relief sought
					<p>b. <u>There are no other reasonably practical and feasible options for providing at least sufficient development capacity within the same locality and market while achieving a well-functioning urban environment; and</u></p> <p>c. <u>The environmental, social, cultural and economic benefits of rezoning outweigh the long-term environmental, social, cultural and economic costs associated with the loss of highly productive land for land-based primary production, taking into account both tangible and intangible values.</u></p>
<b>Submitter 22:</b> Hamilton City Council	22.31	UFD-M62 - Future Proof governance process for out-of-sequence or unanticipated urban development	Support	Hamilton City Council supports the amendment to UFD-M62.	Retain as notified.
<b>Submitter 22:</b> Hamilton City Council	22.32	UFD-M63 - Housing Affordability	Support	Hamilton City Council supports the amendment to UFD-M63.	Retain as notified.
<b>Submitter 22:</b> Hamilton City Council	22.33	UFD-M64 - Public Transport	Support	Hamilton City Council supports the amendment to UFD-M64.	Retain as notified.
<b>Submitter 22:</b> Hamilton City Council	22.34	UFD-M50 - District plan provisions and other mechanisms implementing density targets in the Future Proof area	Support	Hamilton City Council supports the amendment to UFD-M50	Retain as notified.

Submitter	Sub point #	Provision number	Support/oppose	Submission point	Relief sought
Submitter 22: Hamilton City Council	22.35	UFD-M51 - Advocacy for density targets in the Future Proof area	Support	Hamilton City Council supports the amendment to UFD-M51.	Retain as notified.
Submitter 22: Hamilton City Council	22.36	UFD-M52 - Hamilton infill targets	Oppose	The draft of the Hamilton Urban Growth Strategy and Plan Change 12 now proposed that 70 per cent growth to be through infill and intensification of existing urban areas. This also better aligns with strategic direction set through NPS-UD, MSP, HCC PC12 and NPS-HPL.	Hamilton City Council should aim for at least <del>50</del> <u>70</u> per cent of growth to be through infill and intensification of existing urban areas
Submitter 22: Hamilton City Council	22.37	UFD-M66 - Changing amenity values within urban environments	Support	Hamilton City Council supports the amendments to UFD-M66.	Retain as notified.
Submitter 22: Hamilton City Council	22.38	UFD-M67 - Metropolitan centres	Support in part	Propose better define Point 7. – the centre has a strong emphasis on employment to better include and reflect the definition in National Planning standards. The standards define a ‘metropolitan centre’ to be “areas used predominantly for a broad range of commercial, community, recreational and residential activities.	<u>7. The centre provides for employment in a broad range of commercial, community and recreational activities</u>
Submitter 22: Hamilton City Council	22.39	UFD-M58 - Reporting on development in the Future Proof area	Support	Hamilton City Council supports the amendments to UFD-M58.	Retain as notified.
Submitter 22: Hamilton City Council	22.40	UFD-M68 - Review of provisions	Support	Hamilton City Council supports the amendments to UFD-M68.	Retain as notified.
Submitter 22: Hamilton City Council	22.41	UFD-M69 - Council-approved growth strategy or equivalent in	Support	Hamilton City Council supports the amendments to UFD-M69.	Retain as notified.

Submitter	Sub point #	Provision number	Support/oppose	Submission point	Relief sought
		tier 3 local authority areas			
<b>Submitter 22:</b> Hamilton City Council	22.42	UFD-M70 - District Plans	Support	Hamilton City Council supports the amendments to UFD-M70	Retain as notified.
<b>Submitter 22:</b> Hamilton City Council	22.43	UFD-M71 - Housing Affordability	Support	Hamilton City Council supports the amendments to UFD-M71.	Retain as notified.
<b>Submitter 22:</b> Hamilton City Council	22.44	UFD-M72 - Interim arrangements	Support	Hamilton City Council supports the amendments to UFD-M72.	Retain as notified.
<b>Submitter 22:</b> Hamilton City Council	22.45	UFD-M74 - Tier 3 out-of-sequence or unanticipated developments	Support in part	The National Policy Statement for Highly Productive Land commenced on 17 October 2022. This provision should be amended to reflect this higher order document to ensure that it is appropriately considered in applications for out-of-sequence or unanticipated urban development	Insert new provision as follows and renumber subsequent provisions: <u>1. The land is not highly productive land, or if it is highly productive land:</u> <u>a. The urban zoning is required to provide sufficient development capacity to meet expected demand for housing and business land in the district; and</u> <u>b. There are no other reasonably practical and feasible options for providing the required development capacity; and</u> <u>c. The environmental, social, cultural and economic benefits of rezoning outweigh the long-term environmental, social, cultural and economic costs associated with the loss of highly productive land for land-based primary production, taking into account both tangible and intangible values.</u>
<b>Submitter 22:</b> Hamilton City Council	22.46	UFD-PR1 - Planned and co-ordinated subdivision, use and development	Support in part	The National Policy Statement for Highly Productive Land commenced on 17 October 2022. This provision should be amended to reflect this higher order document and to recognise that the highly productive land definition is wider in scope than the WRPS definition of high-class soils.	Amend paragraph 6:  UFD-M5 provides direction for managing rural-residential development. Rural-residential development in some cases has created effects such as reducing options for use of <del>high class soils</del> <u>highly productive land</u> , increasing pressure on

Submitter	Sub point #	Provision number	Support/oppose	Submission point	Relief sought
					roading systems, increasing potential for natural hazards and creating tensions between existing rural land uses [...]
<b>Submitter 22:</b> Hamilton City Council	22.47	UFD-PR3 - Marae and papakāinga	Support	Hamilton City Council supports the amendments to UFD-PR3.	Retain as notified.
<b>Submitter 22:</b> Hamilton City Council	22.48	UFD-PR11 - Adopting Future Proof land use pattern	Support	Hamilton City Council supports the amendments to UFD-PR11.	Retain as notified.
<b>Submitter 22:</b> Hamilton City Council	22.49	UFD-PR12 - Density targets for Future Proof area	Support	Hamilton City Council supports the amendments to UFD-PR12.	Retain as notified.
<b>Submitter 22:</b> Hamilton City Council	22.50	UFD-PR13 - Commercial development in the Future Proof area	Support	Hamilton City Council supports the amendments to UFD-PR13.	Retain as notified.
<b>Submitter 22:</b> Hamilton City Council	22.51	UFD-PR1 - Planned and co-ordinated subdivision, use and development	Support in part	The National Policy Statement for Highly Productive Land commenced on 17 October 2022. This provision should be amended to reflect this higher order document and to recognise that the highly productive land definition is wider in scope than the WRPS definition of high-class soils	Amend paragraph 6: UFD-M5 provides direction for managing rural-residential development. Rural-residential development in some cases has created effects such as reducing options for use of <del>high class soils</del> <u>highly productive land</u> , increasing pressure on roading systems, increasing potential for natural hazards and creating tensions between existing rural land uses [...]
<b>Submitter 22:</b> Hamilton City Council	22.52	UFD-PR19 - Being responsive to significant unintended and out-of-sequence growth within	Support	Hamilton City Council supports the amendment to UFD-PR19.	Retain as notified.

Submitter	Sub point #	Provision number	Support/oppose	Submission point	Relief sought
		tier 3 local environments			
<b>Submitter 22:</b> Hamilton City Council	22.53	UFD-AER8 - Anticipated environmental results	Support in part	The National Policy Statement for Highly Productive Land commenced on 17 October 2022. This provision should be amended to reflect this higher order document and to recognise that the highly productive land definition is wider in scope than the WRPS definition of high-class soils.	Amend: Fragmentation of <del>high-class soils</del> <u>highly productive land</u> is reduced.
<b>Submitter 22:</b> Hamilton City Council	22.54	APP11 - Development Principles	Support in part	The National Policy Statement for Highly Productive Land commenced on 17 October 2022. This provision should be amended to reflect this higher order document and to recognise that the highly productive land definition is wider in scope than the WRPS definition of high-class soils	Amend: be directed away from identified significant mineral resources and their access routes, natural hazard areas, energy and transmission corridors, locations identified as likely renewable energy generation sites and their associated energy resources, <u>regionally significant industry, high-class soils highly productive land</u> , and primary production activities on those <del>high-class soils</del> <u>highly productive land</u> .
<b>Submitter 22:</b> Hamilton City Council	22.55	APP11 - Development Principles	Support in part	The proposed strategy and planning changes (HUGS, PC12 and the MSP-PBC objectives, place a greater level of focus on directing and enabling the intensification of the Hamilton city center and along future rapid transit routes as per the direction of Policy 3 of the NPS-UD.	Amend principle c): c) make use of opportunities for intensification and redevelopment, <u>particularly within urban centres and along future rapid transit routes</u> , to minimise the need for urban development in greenfield areas;
<b>Submitter 22:</b> Hamilton City Council	22.56	APP11 - Development Principles - Principles specific to rural-residential development	Support	The National Policy Statement for Highly Productive Land commenced on 17 October 2022. Policy 6 states that the rezoning and development of highly productive land for rural lifestyle is to be avoided except as provided for in the policy statement. The development principles for rural residential development should be amended to reflect this higher order document.	Insert new provision as follows and renumber subsequent provisions:  a) <u>highly productive land is avoided except where a territorial authority has identified a permanent or longterm constraint on the land as set out in the National Policy Statement for Highly Productive Land 2022;</u>
<b>Submitter 22:</b> Hamilton City Council	22.57	APP12 - Future Proof tables	Support	Hamilton City Council supports the amendment to APP12.	Retain as notified.
<b>Submitter 22:</b> Hamilton City Council	22.58	APP13 - Responsive Planning Criteria - Out-of-	Support in part	APP13 needs to be reviewed by Future Proof Partners and legal review to take into consideration the newly released NPS-HPL criteria for LU-1-3 High Class soils.	APP13 needs to be reviewed by Future Proof Partners and legal review to take into consideration the newly released NPS-HPL criteria for LU-1-3 High Class soils.

Submitter	Sub point #	Provision number	Support/oppose	Submission point	Relief sought
		sequence and unanticipated development (Future Proof local authorities)			
<b>Submitter 22:</b> Hamilton City Council	22.59	APP13 - Responsive Planning Criteria - Out-of-sequence and unanticipated developments (Future Proof local authorities)	Support in part	APP13 Criteria A.C needs to reference consistently all of the relevant Strategy Sections containing growth management directives as there is currently no reference to Sections B5 and B10. This omission is an oversight as there is no clear rationale for the exclusion of the references to Sections B5 and B10. Sections B1 and B4 do not contain any specified growth management directives and can therefore logically be excluded	Amend Criteria A.C as follows: ... growth management directives (as set out in Sections B2, B3, <u>B5</u> , B6, B7, B8, B9, <u>B10</u> and B11 of the strategy.
<b>Submitter 22:</b> Hamilton City Council	22.60	APP13 - Responsive Planning Criteria - Out-of-sequence and Unanticipated Developments (Future Proof local authorities)	Support in part	The word 'us' is incorrect and should be amended to 'use'	Amend: F. In cases where the development is proposing to replace a planned land use with an unanticipated land use, whether it can be demonstrated that the proposal will not result in a shortfall in residential, commercial or industrial land, with robust data and evidence underpinning this analysis.
<b>Submitter 22:</b> Hamilton City Council	22.61	APP14 - Responsive Planning Criteria - Out-of-sequence and unanticipated developments (Non-Future Proof tier 3 local authorities)	Support in part	APP14 needs to be reviewed by Future Proof Partners and legal review to take into consideration the newly released NPS-HPL criteria for LU-1-3 High Class soils.	APP14 needs to be reviewed by Future Proof Partners and legal review to take into consideration the newly released NPS-HPL criteria for LU-1-3 High Class soils.

Submitter	Sub point #	Provision number	Support/oppose	Submission point	Relief sought
Submitter 22: Hamilton City Council	22.62	Map 26	Support in part	Map should correctly identify all of the TA area.	Colour the Te Rapa North Area grey like the rest of Hamilton.
Submitter 22: Hamilton City Council	22.63	Map 43: Future Proof indicative urban limits and village enablement areas	Support in part	NOTE - Additional mapping should be held here as a <i>placeholder</i> to meet requirements of NPS-HPL, Part 3 - Implementation Clause 3.4 Mapping highly productive land.	NOTE - Additional mapping should be held here as a <i>placeholder</i> to meet requirements of NPS-HPL, Part 3 - Implementation Clause 3.4 Mapping highly productive land.
Submitter 22: Hamilton City Council	22.64	Map 43: Future Proof indicative urban and village enablement areas	Support in part	Map and key appear misaligned. There are strategic industrial node numbers (1-13) on the map that do not correspond to anything in the WRPS change.	Remove numbers 1 -13 from the map or update key to properly identify numbered areas.
Submitter 22: Hamilton City Council	22.65	Map 43: : Future Proof wāhi toitū and wāhi toiora areas	Support in part	<p>The National Policy Statement for Highly Productive Land commenced on 17 October 2022. It introduces a definition of highly productive land which is broader in scope than the current WRPS definition of high-class soils. The wāhi toitū and wāhi toiora maps, which the out-of-sequence and unanticipated development criteria rely on, use the high-class soils definition. To avoid any inconsistency with the National Policy Statement for Highly Productive Land, the high-class soils should be removed from Map 44: Future Proof wāhi toitū and wāhi toiora areas. The National Policy Statement for Highly Productive Land, as the higher order document, will need to be satisfied for the out-of-sequence and unanticipated development to then be assessed against the out-of-sequence and unanticipated development criteria.</p> <p>Peat soils were included as wāhi toitū and wāhi toiora as their physical qualities pose challenges to development rather than based on their quality for productive uses and should therefore be retained on the map.</p>	Amend map to remove high class soils (LUC 1, 2 and 3(allophanic)). Retain peat layers

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<b>Submitter 22:</b> Hamilton City Council	22.66	Maps - General	Support in part	These maps have been adapted from the maps in the Future Proof Strategy. The numbers in the legend on each map still have the Future Proof map numbers. These should be removed	Amend maps to correct map number in each legend
<b>Submitter 23:</b> Roderick Aldridge	23.1	SRMR-PR1 - Effects of climate change	Support in part	New Zealand's response in terms of actions to reduce climate change is everybody's role, not primarily a central government rather than a local government role. Growers from backyard gardeners to multinational food, crop and forestry corporations need to change from practices which use high inputs of energy-dense chemicals which degrade soils and biodiversity to regenerative practices to regenerative practices which use energy from the sun and diverse organisms in the soil to regenerate ecosystems, biodiversity, and even reverse climate change.	That the Waikato Regional Council growers, of food and produce to change to regenerative practices. This should include information and examples, removing barriers to changing to appropriate land use
<b>Submitter 23:</b> Roderick Aldridge	23.2	IM-05 - Climate Change	Support in part	Land use should be managed to support reductions in greenhouse gas emissions within urban environments by restoring wetlands, daylighting closed channels and supporting regenerative growing practices within urban environments.	Manage land use in urban areas to support regenerative practices.
<b>Submitter 24:</b> Toi Te Ora Public Health	24.1	1.6 Definitions	Support	Toi Te Ora Public Health supports the inclusion of Inclusionary Zoning which requires a certain proportion of new residential development to be provided as affordable housing and retained as affordable for future generations. This is because a healthy home brings together three key aspects: the physical conditions of the house, the suitability of the house for its occupants, and the affordability of the house. Affordability, together with quality, safety, and suitability of housing are important determinants of health and wellbeing.	Retain as notified.
<b>Submitter 24:</b> Toi Te Ora Public Health	24.2	SRMR-I2 - Effects of climate change	Support in part	We support Council in understanding the importance of reducing greenhouse gas emissions along with being resilient to the current and future effects of climate change. While providing the ability for urban environments to be resilient to climate change, Council also needs to	To ensure development of the built environments is healthy, large-scale development must be located (or provide) good accessibility between housing, employment, community and other services and open space. In relation to what is considered good accessibility, it is a

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				consider improving and promoting the health and wellbeing of its community by continuously improving community resilience. For example, not allowing new developments in areas that have an increased risk of natural hazards and taking an approach that will reduce the number of people in harm's way	development that achieves all aspects mentioned in SRMR-PR4, and we would advise that Council goes further by increasing active transport, which will reduce motor vehicle dependency, and reduce emissions.
<b>Submitter 24:</b> Toi Te Ora Public Health	24.3	SRMR-I4 - Managing the Built Environment	Support in part	We support Council in understanding the importance of reducing greenhouse gas emissions along with being resilient to the current and future effects of climate change. While providing the ability for urban environments to be resilient to climate change, Council also needs to consider improving and promoting the health and wellbeing of its community by continuously improving community resilience. For example, not allowing new developments in areas that have an increased risk of natural hazards and taking an approach that will reduce the number of people in harm's way	To ensure development of the built environments is healthy, large-scale development must be located (or provide) good accessibility between housing, employment, community and other services and open space. In relation to what is considered good accessibility, it is a development that achieves all aspects mentioned in SRMR-PR4, and we would advise that Council goes further by increasing active transport, which will reduce motor vehicle dependency, and reduce emissions.
<b>Submitter 24:</b> Toi Te Ora Public Health	24.4	SRMR-PR4 - Managing the Built Environment	Support in part	We support Council in understanding the importance of reducing greenhouse gas emissions along with being resilient to the current and future effects of climate change. While providing the ability for urban environments to be resilient to climate change, Council also needs to consider improving and promoting the health and wellbeing of its community by continuously improving community resilience. For example, not allowing new developments in areas that have an increased risk of natural hazards and taking an approach that will reduce the number of people in harm's way	To ensure development of the built environments is healthy, large-scale development must be located (or provide) good accessibility between housing, employment, community and other services and open space. In relation to what is considered good accessibility, it is a development that achieves all aspects mentioned in SRMR-PR4, and we would advise that Council goes further by increasing active transport, which will reduce motor vehicle dependency, and reduce emissions.
<b>Submitter 24:</b> Toi Te Ora Public Health	24.5	Integrated Management Objectives	Support in part	Integrated Management is significant for public health and the community. Promoting dense urban development will allow walking and cycling and public transport to be more viable. Increasing density makes community sanitary services more affordable, increasing access and public health protection. However, intensification has risks such as increasing the spread of infectious diseases due to	We would advise that the social and mental wellbeing effects of natural hazard impacts to public health are considered in addition to whether a site is significantly constrained when addressing natural hazards. To do so will support urban environments to be resilient to the current and future effects of climate change and enhance amenity though healthy, safe and sustainable built environments.

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				people living closer together and more people exposed to the environmental impacts of urban development such as noise pollution, loss of privacy and the ability to grow food and play outdoors at home.	<p>We support policy aligning to intensification and in fill which are two key aspects of urban development. Unless that is, infill is in hazardous environments, such as areas that will be impacted by climate change and natural hazards.</p> <p>From a public health perspective to achieve integrated and sustainable growth management, large scale urban growth must address connectivity to existing urban development from the outset.</p>
<b>Submitter 24:</b> Toi Te Ora Public Health	24.6	EIT-M4 - Regional land transport plan	Support in part	Toi Te Ora supports this policy. But we would like to see attention given to the ongoing improvement of the transport network to make it easier to get around by promoting active transport and more sustainable transport options such as buses and bikes.	Better promote active and public transport in the WRPS.
<b>Submitter 24:</b> Toi Te Ora Public Health	24.7	Urban Form and Development	Support in part	We support the proposed changes to the built environment objectives and wish to emphasise the importance to public health that all infrastructure required to serve new development is available. It is our experience that infrastructure which is programmed or planned and does not have consent provides insufficient certainty. Development should not occur unless all infrastructure required to serve new development is available or approved from the outset. Otherwise, there is a risk of development without adequate infrastructure. For instance, households serviced by onsite systems once isolated and remote, become communities better serviced by a centrally located reticulated scheme because the onsite systems no longer provide the level of health protection necessary to ensure people are separated from their waste. However, to provide adequate infrastructure in retrospect can take years and meanwhile, the health of the community is compromised. This is an example why it	<p>When Council considers whether a development protects and provides for human health, and contributes to a well—functioning urban environment, as mentioned elsewhere in this submission, it is recommended that the social and mental wellbeing effects from natural hazards and climate change to the public be considered.</p> <p>Prior to releasing land for structure planning and development, we suggest that the social and mental wellbeing effects of natural hazard impacts be considered when addressing amenity, climate change and natural hazards.</p>

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				is in no one's interest to allow growth and development without suitable infrastructure from the outset.	
<b>Submitter 24:</b> Toi Te Ora Public Health	24.8	Part 5 - Appendices and Maps	Support	Toi Te Ora supports the general development principles for urban development and the specific rural-residential development policies to manage inappropriately located subdivision use and development. While the separation between incompatible land uses will provide the best protection for human health, ensuring development is also well connected with existing and planned development and infrastructure will protect the environment from contamination, which is a necessity for current and future populations. Furthermore, ensuring the necessary water is available to support development and that development is planned and designed to achieve the efficient use of water, will improve the sustainability of the natural environment and in the long-term protect public health.	Retain as notified.