

11 December 2009

Mr B. Laing
Chief Executive
Environment Waikato
PO Box 4010
HAMILTON EAST 3247

Dear Sir

SUBMISSION TO THE WAIKATO REGIONAL POLICY STATEMENT - CHANGE NO.2 - FUTURE PROOF

1.0 INTRODUCTION

1.1 Hamilton City Council (HCC) welcomes the opportunity to make a submission to Environment Waikato on the proposed Waikato Regional Policy Statement - Change No. 2 - Future Proof.

2.0 GENERAL COMMENTS

2.1 HCC has reviewed the proposed Regional Policy Statement in light of Future Proof to see if they align appropriately.

2.2 The Regional Policy Statement sets the policy framework for district planning as well as providing a statutory basis under the Resource Management Act (RMA) 1991 for implementing the Future Proof Strategy.

2.2.1 HCC considers that the proposed change to the Regional Policy Statement Change No. 2 is consistent with the Future Proof Strategy and Implementation Plan 2009. This will provide a consistent, integrated and sustainable approach to the management of growth throughout the Future Proof sub-region.

2.2.2 It is noted that the Future Proof Implementation Committee has approved the policy content of the proposed Regional Policy Statement, and that HCC is in general support of the proposed Regional Policy Statement Change No. 2.

3.0 SPECIFIC POLICY COMMENTS

3.1 Policy 1: Governance Collaboration

3.1.1 Policy 1 seeks a collaborative approach to growth management in the Future Proof Area. HCC supports this approach, as it will allow for the effective and sustainable implementation of the Future Proof Strategy.

3.1.2 Decision sought: Retain Policy 1.

3.2 Policy 2: Adoption of Long Term Land Use Pattern

3.2.1 Policy 2 provides for the adoption of a long term land use pattern, limiting urban development to the land use pattern and sequencing that has been

established through the Future Proof Strategy process. HCC considers that the policy is necessary to ensure sustainable growth management in the Future Proof sub-region.

- 3.2.2 HCC is of the view that it is important to ensure urban development takes place within defined areas in order for it to occur in an integrated and sustainable manner. It will also ensure that infrastructure is provided for efficiently and effectively, and that the principles of 'live, work, play' are provided for.
- 3.2.3 The 'Analysis of Costs, Benefits and Alternatives' report¹ quotes the Royal Commission on Auckland Governance which concluded that urban limits and intensification policies are essential to the development of a successful city in the 21st century. This highlights the importance of Policy 2 in delivering sustainable growth and successful settlements in the Future Proof sub-region.
- 3.2.4 Policy 2 includes provision for some flexibility in accordance with Policies 9 and 10 which HCC considers to be appropriate.
- 3.2.5 Decision sought: Retain Policy 2

3.3 **Policy 3: Urban Form**

- 3.3.1 Policy 3 seeks to achieve compact urban environments by specifying average gross density targets for residential development in various locations. HCC supports this policy as it will seek to achieve more compact urban environments that support existing commercial centres and multi-modal transport options as well as allowing people to live, work and play within their local area.
- 3.3.2 HCC is of the view that implementing the density targets as specified in Policy 3 will also assist in more efficient and effective use of land and infrastructure, and will create less energy intensive environments (i.e. less travel distance and greater potential for multi-modal transport options).
- 3.3.3 Decision sought: Retain Policy 3

3.4 **Policy 4: Development Principles**

- 3.4.1 Policy 4 sets out development principles which will be given particular regard by the Future Proof councils in managing the built environment. The proposed development principles align with the principles in the Future Proof Strategy.
- 3.4.2 HCC is of the view that having clear principles is integral to ensuring planning for the built environment is integrated and sustainable. Therefore HCC supports Policy 4, however, HCC would like to see principles (l) and (r) framed as a separate policy given their critical importance in implementing the Future Proof Strategy.
- 3.4.3 Principle (l) seeks to ensure that new large scale commercial activities are located to support the vitality, viability and self sufficiency of existing commercial centres in Hamilton, Cambridge, Te Awamutu, Huntly, Ngaruawahia, Te Kauwhata and Raglan, and are not located on land specifically provided for industrial activities. Principle (l) seeks to give effect to a fundamental Future Proof principle which is to ensure that existing commercial centres, towns and villages within the sub-region are supported.

¹ Waikato Regional Policy Statement: Proposed Change No. 2 (Future Proof). Analysis of costs, benefits and alternatives under section 32 of the RMA.

- 3.4.4 Principle (r) recognises that the Hamilton Central Business District is the primary retail, business, arts and social centre of the Future Proof area. This is one of the fundamental guiding principles for Future Proof.
- 3.4.5 It is therefore considered that principles (l) and (r) should be formulated as a new policy to support the overall objective of the Regional Policy Statement Change No. 2, to ensure that development of the built environment (including transport and other infrastructure) and associated land use in Hamilton City, Waipa District and Waikato District occurs in an integrated, planned and sustainable manner which creates positive social, cultural, economic and environmental outcomes from development.
- 3.4.6 Decision sought: Retain Policy 4 except insofar as principles (l) and (r) are formulated as a separate policy within the Plan Change and any other consequential changes to give effect to this submission.
- 3.5 Policy 5: Planning for Urban Development**
- 3.5.1 Policy 5 seeks to ensure that structure plans are in place before land is rezoned for urban development or prior to a major subdivision consent being granted.
- 3.5.2 HCC is of the view that planning for development should be undertaken in a comprehensive manner rather than by piecemeal or ad-hoc approaches. Structure Plans are considered to be an appropriate method for ensuring integrated and sustainable growth management.
- 3.5.3 Decision sought: Retain Policy 5.
- 3.6 Policy 6: Planning for Rural-residential Development**
- 3.6.1 Rural-residential development in the Future Proof sub-region has resulted in a number of adverse effects, as set out in the 'Analysis of Costs, Benefits and Alternatives' report².
- 3.6.2 Policy 6 sets out a requirement for rural-residential development to occur in a planned and co-ordinated way, largely directed to defined rural-residential areas. HCC considers that the requirements of Policy 6 are in accordance with the Future Proof Strategy.
- 3.6.3 Decision sought: Retain Policy 6
- 3.7 Policy 7: Co-ordinating Growth and infrastructure**
- 3.7.1 Policy 7 requires the integration of land use planning and infrastructure planning, which is key to implementing the Future Proof Strategy.
- 3.7.2 The efficient and effective provision of infrastructure requires certainty in terms of land use development. A comprehensive and long term approach to the location, timing and type of development allows for certainty in terms of infrastructure planning. HCC considers that this Policy is necessary and appropriate.
- 3.7.3 Decision sought: Retain Policy 7
- 3.8 Policy 8: Monitoring Effectiveness**
- 3.8.1 Policy 8 requires the Future Proof councils to monitor and report on development and infrastructure trends and pressures in the Future Proof area. HCC supports this monitoring and reporting requirement as it will help to ensure

² Waikato Regional Policy Statement: Proposed Change No. 2 (Future Proof). Analysis of costs, benefits and alternatives under section 32 of the RMA.

that the effectiveness of the policies and methods can be assessed and improvements made where necessary.

3.8.2 Decision sought: Retain Policy 8

3.9 Policy 9: Minor Extensions to Urban Limits

3.9.1 Policy 9 allows for minor extensions to urban limits when proposed urban development is contiguous with (but to a limited extent outside) the Urban Limits shown on Map 1, where certain conditions are met, and when this occurs as part of structure plans and /or District Plan changes. HCC considers this policy as necessary in order to ensure that on-the-ground conditions can be taken into account.

3.9.2 Decision sought: Retain Policy 9

3.10 Policy 10: Review Mechanism

3.10.1 Policy 10 establishes the situations under which a review of Policy 2 may be undertaken. This policy ensures that the effectiveness of the provisions of Policy 2 can be kept under review and be informed by the monitoring to be undertaken in accordance with Policy 8. HCC considers that this Policy is necessary and appropriate.

3.10.2 Decision sought: Retain Policy 10


4.0 CONCLUDING COMMENTS

4.1 HCC trusts that the points made in this submission are helpful to Environment Waikato when considering all submissions to the proposed Waikato Regional Policy Statement - Change No. 2 - Future Proof.

4.2 HCC **does wish to be heard** at the hearings held by Environment Waikato in support of this submission.

4.3 If you require clarification of the points raised in this submission, or additional information, please contact Susan Henderson in the first instance on 07 958 5901 or email susan.henderson@hcc.govt.nz.

Yours faithfully



Michael Redman
CHIEF EXECUTIVE