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30 April 2026

Waipā District Council
Private Bag 2402
Te Awamutu 3840
Attn: Proposed Private Plan Change 37 Submission

waikatoregion.govt.nz

Email: districtplan@waipadc.govt.nz

Dear Sir/Madam

Waikato Regional Council Submission to Proposed Private Plan Change 37 – Rider Park Structure Plan to the Waipā District Plan

Thank you for the opportunity to make a submission on the Proposed Private Plan Change 37 – Rider Park Structure Plan to the Waipā District Plan. Please find attached the Waikato Regional Council's submission regarding this document. This submission was formally endorsed by the Council on 30 April 2026. Waikato Regional Council looks forward to being involved in further discussion on this subject.

Should you have any queries regarding the content of this document please contact Katrina Andrews, Senior Policy Advisor, Strategic and Spatial Planning directly on (07) 8590 929 or by email Katrina.Andrews@waikatoregion.govt.nz.

Regards,

Tracey May
Director Science, Policy and Information

30 April 2026

Introduction

1. Waikato Regional Council (WRC) appreciates the opportunity to make a submission to Proposed Private Plan Change 37 – Rider Park Structure Plan to the Waipā District Plan (PPC37). WRC's primary interest is in relation to the Waikato Regional Policy Statement (WRPS). District plans, including plan changes such as this one, are required to give effect to the WRPS under s75(3)(c) of the Resource Management Act 1991 (RMA). Territorial authorities must also have regard to Proposed WRPS Change 1 (National Policy Statement on Urban Development and Future Proof Strategy Update) (WRPS Change 1) – Decisions version under s74(2)(a)(i) of the RMA.
2. The key areas of interest for PPC37 relate to the WRPS and Proposed WRPS Change 1 – Decisions version, the Future Proof land use pattern, highly productive land/high class soils and ecological effects, particularly in relation to long-tailed bats and their habitat.
3. Given the proximity of the site to the Waikato River, we also highlight that it is important the plan change gives effect to Te Ture Whaimana o Te Awa o Waikato – the Vision and Strategy for the Waikato River. This includes ensuring that stormwater is appropriately managed within the plan change area in accordance with the Waikato Stormwater Management Guideline and Regional Infrastructure Technical Specifications.
4. WRC acknowledges that approximately 45.71ha of the plan change site is currently zoned Deferred Residential and located within the C5 Growth Cell, which is identified for future urban development post-2035 in the Waipā District Plan. The plan change proposes to bring forward the planned timing of development of this area. Whereas the remaining approximately 52.89ha of the site, which is currently zoned Rural, is not identified for future urban development in the WRPS, Future Proof Strategy 2024 nor Waipā District Plan.
5. We consider the proposed plan change does not currently provide sufficient evidence to demonstrate that the proposed rezoning of the Rural Zone portion of the site meets the requirements for urban rezoning of highly productive land under the National Policy Statement for Highly Productive Land 2022 (NPS-HPL); particularly that the rezoning is required to provide sufficient development capacity to meet demand for housing land, or that the 'live-zoning' of the C5 Growth Cell needs to be brought forward. Further assessment and evidence would be required to demonstrate whether the plan change meets the requirements of the NPS-HPL and the criteria for Out-of-sequence and unanticipated developments in Proposed WRPS Change 1 – Decisions version.
6. Our submission is focused on ensuring a strategic and integrated approach is taken to the zoning of land for urban development and that the proposed rezoning is supported by sufficient information in accordance with the WRPS, as is required by the Resource Management Act 1991 (RMA). It is particularly important that sufficient evidence is provided to demonstrate the suitability of the proposed urban land use for the Rural Zone portion of the site, given this is not anticipated by strategic planning documents.
7. The unanticipated/out-of-sequence nature of the proposed plan change also creates challenges for integrated infrastructure and transport planning, including for public transport provision. It is important that the plan change does not undermine existing infrastructure and transport planning, achieves efficient use of natural resources and supports reductions in greenhouse gas emissions. It is noted that emissions are likely to be more from the proposed urban use than the present rural use, information on how the proposal intends to mitigate this increase is lacking.

8. The table below identifies specific areas where further assessment is recommended in relation to the relevant higher-order policy documents under the RMA. It also provides recommended amendments to proposed provisions. **274**

Table of specific submission points: WRC submission to Proposed Private Plan Change 37 – Rider Park Structure Plan to the Waipā District Plan **274**

Submission point	Provision	Support/ oppose	Submission	Relief sought
Highly productive land and proposed urban rezoning				
9.	Plan change request (Section 9.2), Soils Assessment and Economic Assessment	Oppose	As identified in section 9.2 of the plan change request, the NPS-HPL applies to the Rural Zone portion of the site. Clause 3.6 of the NPS-HPL applies to the proposed urban rezoning of this portion of the site. We consider that the assessments provided in the plan change request do not provide sufficient evidence to demonstrate that Clause 3.6 is met; particularly Clauses 3.6(1)(a), 3.6(1)(b) and 3.6(5). The following submission points highlight particular areas of concerns with the Soils and Economic Assessments, which are reflected in the NPS-HPL assessment within the plan change request. Additionally, the WRPS seeks to avoid a decline in the availability of high class soils for primary production due to inappropriate subdivision, use or development (LF-O5, LF-P11). Method LF-M41 directs that district plans shall give priority to productive uses of high class soils including, among other actions, through restricting urban development on these soils.	Provide a more robust assessment to demonstrate whether the proposed plan change gives effect to Clause 3.6 of the NPS-HPL.
10.	Plan change request (Section 9.2), Soils Assessment and Economic Assessment	Oppose	Section 5 of the Soils Assessment discusses the transitional definition of 'highly productive land' prior to the mapping of highly productive land being undertaken by regional councils under the NPS-HPL. This states that <i>"LUC 1, 2, or 3 land is defined by reference to the New Zealand Land Resource Inventory or by any more detailed mapping that uses the Land Use Capability classification"</i>. This statement is not correct for the purpose of the NPS-HPL assessment, as the transitional definition of highly productive land in Clause 3.5(7) of the NPS-HPL refers to land that is zoned general rural or rural production at the commencement date and is LUC 1, 2 or 3 but does not meet any of the exemptions in Clause 3.5(7)(b). The NPS-HPL does not provide the ability to provide a site-specific assessment for the purpose of	Clarify that the entirety of the Rural Zone portion of the plan change site meets the transitional definition of highly productive land under the NPS-HPL and ensure the relevant assessments reflect this.

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			demonstrating whether land meets the transitional definition under Clause 3.5(7). As identified in Section 6 of the Soils Assessment, based on the NZLRI map information at the commencement date of the NPS-HPL, the site comprises LUC2 and LUC3 soils. Therefore, under Clause 3.5(7) the entirety of the Rural Zone portion of the site meets the transitional definition of highly productive land.	
11.	Plan change request (Section 9.2), Soils Assessment and Economic Assessment	Oppose in part	In addition to the above, we query the classification and interpretation of the 'non-productive/modified soil' areas identified for the site in the Soils Assessment. The legends of some of the maps provided in the report (e.g. Figure 6) indicate that these areas contain "<i>disturbed soil and fill, excavated drains and spill, track, buildings, large windbreaks, and buildings and curtilage</i>". The later text in the comments section of the report appears to indicate that the inclusion of linear 'modified' features such as farm tracks or large windbreaks are being used to help argue that otherwise contiguous areas of highly productive land (e.g. LUC 2s1) are fragmented, not easily used for <i>intensive</i> primary production, and (as a result) have reduced productive potential. We question this interpretation for the following reasons. While it is true that the soils directly under a formed farm track have likely been irreversibly modified and could be considered no longer 'productive' themselves, farm tracks could also be considered essential farm infrastructure required to enable the productive use of the adjacent paddocks. It may also be true that the presence of farm tracks and large windbreaks in relative proximity might hamper future arable use (although noting that large windbreaks could be removed but would likely involve some localised soil disturbance). However, such farm infrastructure could support intensive pastoral or horticultural uses (as opposed to hamper or limit such uses). We consider that using features such as farm tracks and windbreaks to help imply fragmentation of highly productive land and thus	Amend the NPS-HPL assessment to reflect that the linear modified features such as farm tracks and large windbreaks on the site do not create a blanket reduction in productive potential.

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			a <i>blanket</i> reduction in productive potential is an overstretch in interpretation. This is particularly relevant as this argument is used in the Economic Assessment and plan change request in assessing the NPS-HPL; for example, in section 9.2 of the plan change request and the executive summary of the Economic Assessment (pages 7 and 8).	
12.	Economic Assessment	Oppose	We consider the Economic Assessment does not provide sufficient evidence to demonstrate that the proposed urban rezoning of the Rural Zone portion of the site is required to provide sufficient development capacity to meet demand for housing or business land to give effect to the National Policy Statement on Urban Development 2020, or that the 'live-zoning' of the C5 Growth Cell needs to be brought forward from the planned post-2035 timing. This assessment is required to demonstrate that the proposed plan change gives effect to Clause 3.6(1)(a) of the NPS-HPL and Method UFD-M49 and APP13 Criteria A of Proposed WRPS Change 1 – Decisions version. We have a number of concerns with the robustness of the Economic Assessment, including: • We consider the assessment does not provide sufficient reasoning to justify the use of the 'current (2022) prices scenario' rather than the 'market growth scenario' preferred in the Future Proof Housing Development Capacity Assessment 2023 (HDCA). The use of the 'current prices scenario' has a significant impact on the residential development capacity identified for Cambridge in the Economic Assessment, with insufficient analysis to justify this. • The assessment focuses on the 'reasonably expected to be realised' capacity identified in the HDCA, with limited consideration of the plan-enabled capacity.	That a more detailed and robust economic assessment of PPC37 be undertaken, in order to demonstrate whether or not the proposed plan change gives effect to Clause 3.6 of the NPS-HPL and the relevant provisions of the WRPS and Proposed WRPS Change 1 – Decisions version.

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			- While the assessment focuses on 'reasonably expected to be realised' capacity when assessing sufficiency of existing development capacity in Cambridge, it does not provide any detailed assessment of the feasibility of providing the necessary infrastructure to service the plan change area. It acknowledges significant infrastructure costs but does not quantify that cost or test its effect on feasibility, lot prices, or housing affordability. - The assessment conflates additional capacity with affordable supply without modelling likely dwelling prices or product mix. We also note that the HDCA was prepared using the best available evidence at the time to set the base assumptions, including population projections based on 2018 census data. Since the 2023 HDCA was prepared, there are new population projections based on the 2023 census data and the market conditions have evolved. Any further detailed assessment must demonstrate how it has considered this more current evidence.	
13.	Plan change request (Section 9.11.1.1)	Further assessment required	Section 9.11.1.1 of the plan change request provides an assessment against Policies UFD-P1 and UFD-P11 and Appendix APP13 of the WRPS/Proposed WRPS Change 1 – Decisions version. A number of other objectives, policies and methods of the Urban form and development chapter of the WRPS/Proposed WRPS Change 1 – Decisions version are also relevant to PPC37, including Objective UFD-O1 , Policies UFD-P2, UFD-P12 and UFD-P13 (in relation to the proposed Neighbourhood Centres), Methods UFD-M1, UFD-M2, UFD-M8, UFD-M11 and UFD-M49, and Appendix APP11. These provisions provide policy direction on important matters relevant to the proposed urban rezoning, such as integration of land use and infrastructure and achieving compact urban environments that support multi-modal transport options.	Ensure the proposed plan change is assessed against all relevant objectives, policies and methods of the WRPS and Proposed WRPS Change 1 – Decisions version.
Urban form and transport				
14.	Structure Plan	Support	We support design principles within the proposed Structure Plan that support creating a more compact and carbon positive development,	Retain principles within the Structure Plan relating to

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			encouraging mode shift and ensuring development has good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of enabling public or active transport.	compact urban form, encouraging mode shift and ensuring good accessibility, including by way of public and active transport.
Ecological effects				
15.	Plan change request (Sections 9.11.1.3 and 9.12)	Further assessment required	Section 9.11.1.3 of the plan change request comments on Policy ECO-P2 of the WRPS. However, we note that given the ecological values of the plan change site identified in the Ecological Assessment, particularly in relation to long-tailed bats, a number of other provisions of the Ecosystems and indigenous biodiversity (ECO) chapter are also relevant to the plan change. This includes Objective ECO-O1, Policy ECO-P1 and Methods ECO-M1, ECO-M2, ECO-M3, ECO-M13 and ECO-M14. We also note that the northern portion of the plan change site is within a Biodiversity Corridor ('750m River/Stream Corridor') under the Waipā District Plan. We recommend that an assessment be provided in relation to the relevant objectives and policies within Section 24 of the district plan relating to maintenance and enhancement of indigenous biodiversity within biodiversity corridors.	Provide assessments against all relevant provisions of the ECO chapter of the WRPS and the relevant objectives and policies of Section 24 of the Waipā District Plan.
16.	Ecological Assessment	Further assessment required	We seek the following clarifications/areas of further assessment in relation to the Ecological Assessment: Section 3.8.3 states that <i>"Through a combination of planting trees, installing artificial roost boxes, and treating weedy trees, the magnitude of effect from removing 120 potential roost trees is assessed as Negligible and the level of effect on long-tailed bats is assessed as Low."</i> We note that planting cavity-bearing trees is a long-term mitigation option and may not result in desired outcomes. Installing artificial roost boxes and treating weedy trees are not guaranteed to be successful at providing appropriate roosting conditions (thermal,	Provide updates to the Ecological Assessment to address all matters identified in this submission point.

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			humidity, etc). We query how the outcomes of these mitigation options are to be assessed in the short-medium-long term. If these are not successful, have alternatives or increasing these measures been considered? When is the trigger point for this (e.g. in the short-term; after 5 years of no occupancy)? • We recommend Table 3 should identify the actual/potential effect, ecological value, magnitude, mitigation measures and overall level of effect prior to and following mitigation. • We recommend further detail be provided in relation to the bird surveys undertaken (Section 4.2), including how many hours and days in the year the opportunistic observations were undertaken, and what buffer/search distance from the site was used for the reviewed databases. • In relation to the lizard assessment (Section 5), we query whether there was no rank grass or suitable habitat around fencelines or on the western edge of the site where trees have been removed due to damage from Cyclone Gabrielle. Suitable surveys are required if habitat is available on site to determine copper skink presence. • Section 6 does not describe the wetlands on-site as 'natural inland wetlands' under the National Policy Statement for Freshwater Management (NPS-FM) criteria. We recommend the report specifies if all wetlands are considered 'natural inland wetlands'. • We note there appears to be a potential wetland in the north-eastern corner of the site. It would be useful to know if this area was considered in any assessment. • Regarding Table 13, with the lack of understanding of bat roost availability in the surrounding landscape (as per Section 3.8.2 of the report), it is unclear how the magnitude of effect would be considered low. The overall level of effect is dependent on the short-term success of mitigation measures which are not guaranteed to be successful.	

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			- Regarding the statement in Section 9.1 that <i>“The removal of potential roosting habitat for long-tailed bats is assessed as a Moderate level of effect and recommendations are made to remedy this effect through the creation of new suitable roosting habitat within the Site to reduce the level of effect to Low”</i>, we query how the suitability of created roosting habitat is going to be assessed. We recommend that more detail be provided on this. - We recommend more detail be provided on how the proposed compensation was calculated. This includes how the figure of \$200,000 to be contributed to Waipā District Council or a local community trust for predator control and monitoring was calculated, and more detail on how many years this is likely to cover.	
17.	Ecological Assessment and Structure Plan	Support in part	We support the proposed protection and enhancement of the gully and riverbank areas on the site via the creation of reserves. It is important that the plan change maintains and enhances the functionality of the reserve areas as habitat for long-tailed bats and other indigenous species. We note that Figure 6 of the Ecological Assessment, which shows ‘proposed mitigation areas’, identifies the escarpment area in the north-west of the site as ‘Wildlife Habitat Area’, surrounded by a proposed ‘Light Management Area’. The proposed Structure Plan shows a Light Management Area in this location; however, the escarpment area itself is shown as Medium Density Residential Zone. It is unclear whether the Ecological Assessment recommendations are based on this area being protected as a reserve. This should be clarified, and the Structure Plan updated to ensure it reflects the recommendations of the Ecological Assessment.	Clarify whether the Ecological Assessment recommends that the escarpment area in the north-west of the site be protected as reserve and update the Structure Plan accordingly.

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			 <i>Figure 1 - Excerpts from Ecological Assessment Figure 6 and proposed Structure Plan</i>	
18.	Ecological Assessment and Structure Plan	Further assessment required	The north-eastern boundary of the site adjoins a vegetated gully area to the east. The area of the plan change site adjacent to this boundary is proposed to be rezoned to Medium Density Residential Zone. While there is a Light Management Area proposed along this boundary, the proposed development of this area has potential to reduce connectivity between the gully to the east of the site and the Waikato River. We recommend further consideration be provided to whether additional measures (e.g. a planted buffer area) are needed to address this.	Provide further consideration as to whether additional measures are needed to address potential loss of habitat connectivity in the north-eastern corner of the plan change area.

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			Creating buffers, linkages and corridors to support indigenous biodiversity values aligns with Policy ECO-P1 and Method ECO-M1 of the WRPS.	
19.	Structure Plan	Support with amendments	We support the descriptions of the landscape response and open space network within the proposed Rider Park Structure Plan. However, we consider the Structure Plan text should clearly reflect the key recommendations of the Ecological Assessment affecting the layout and development of the plan change area. This would ensure future development remains in accordance with the recommendations of the Ecological Assessment and aid in the assessment of future resource consent applications. We recommend the Structure Plan includes descriptions of: • The ecological significance and purpose of the reserve areas, including protection of habitat for long-tailed bats, birds and lizards. • The purpose of the 20m Light Management Area (shown on the Structure Plan map), in accordance with the recommendations of the Ecological Assessment. • Recommendations within the Ecological Assessment to: - Minimise the presence of roads immediately adjacent to proposed reserves and the Rider Park boundary to minimise degradation of bat habitat due to increased lighting. - Retain/establish a tall hedge, fence, shelterbelt or other buffer on the boundary of the site and reserves.	Amend the text of proposed Rider Park Structure Plan to better reflect key recommendations of the Ecological Assessment.
20.	New issues, objectives, policies, rules and assessment criteria/information requirements	New provisions recommended	Long-tailed bats are a Threatened - Nationally Critical species present in the Waipā area. The Ecological Assessment identifies that the PPC37 site provides commuting and foraging habitat for long-tailed bats and that the site contains potential bat roost trees. Given the identified ecological effects of the proposal, particularly on long-tailed bats and their habitat, we recommend the provisions of the plan change be strengthened to meet the direction of the WRPS, particularly Policies ECO-P1 and ECO-P2 and	Add issues, objectives, policies, rules and assessment criteria/information requirements in relation to the maintenance and enhancement of ecological values, particularly long-

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			Methods ECO-M1 and ECO-M13, and reflect the recommendations of the Ecological Assessment. The plan change should include a cascade of issues, objectives, policies, rules and assessment criteria/information requirements relating to ecological values within the plan change area, particularly long-tailed bats and their habitat, and measures to protect, maintain and enhance those values. These provisions should reflect the recommendations of Ecological Assessment (including any updates required to address the matters discussed in this submission). The rules should include a requirement to prepare an Ecological Management Plan for the plan change area as part of the first subdivision or land use consent for the area. This should include the following: • A Bat Management Plan (in accordance with Section 9.1 of the Ecological Assessment) prepared by a suitably experienced bat ecologist, which provides further detail on measures to avoid, minimise, remedy and compensate for effects on long-tailed bats and their habitat, including: - Protection of foraging, commuting, and roosting habitats via the creation of reserves - Measures for reducing the risk of mortality, injury and disturbance to long-tailed bats during tree removal and earthworks, in accordance with the latest version of the Department of Conservation 'Protocols for Minimising the Risk of Felling Bat Roosts' - Lighting design to minimise adverse lighting effects - Planting/maintenance specifications for planting within the reserves and for retaining/establishing a tall hedge, fence, shelterbelt or other buffer on the boundary of the site and reserves	tailed bats and their habitat, within the plan change area. These provisions should reflect the recommendations of the Ecological Assessment.

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			- Details of how planting and light spill will be managed where transport corridors are located adjacent to proposed reserves and the Rider Park boundary - Installation, maintenance and monitoring of bat roosting boxes - Treatment of weedy trees to encourage the development of potential roosting habitat in existing forested gully and river embankment habitats on-site - Compensation measures to address residual adverse effects and achieve a net biodiversity gain, including restoration/planting plans, details of predator control and monitoring and details of the financial contributions. • A pest/weed management plan (including ongoing monitoring/maintenance specifications, consideration of control/ban on cats). • Guidance on avoidance of native bird nesting/nests during tree felling and land disturbance. • Guidance on avoidance if lizard habitat is available. Attention should be focussed during land disturbance activities around amenity garden habitat, rank grass (commonly along fencelines) and areas providing leaf litter, fallen debris, etc – if native lizards are detected a lizard management plan should be required. • Appropriate design and construction of stormwater infrastructure to demonstrate negligible impact on wetlands. The rules should also require future resource consent applications in the Rider Park Structure Plan area to be consistent with the approved management plans.	
21.	Rule 2A.4.2.70	Support	We support proposed Rule 2A.4.2.70 to mitigate lighting effects on long-tailed bats, in accordance with the recommendations of the Ecological Assessment.	Retain proposed Rule 2A.4.2.70.

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22.	Potential new rule	Further assessment required	Other recent plan changes in the Waipā and Hamilton areas affecting long-tailed bat habitat have included minimum building setback requirements from the edge of reserves/bat habitat areas. ¹ We note the plan change proposes geotechnical setbacks from the majority of the indicative reserve areas, however the Ecological Assessment does not discuss whether any setback rules are recommended to minimise adverse effects on bats/bat habitat within the Rider Park Structure Plan area.	Consider whether any additional building setback rule is needed to minimise adverse effects on bats/bat habitat.
Natural hazards				
23.	Stormwater Management Plan and Geotechnical Assessment	Neutral	WRC has not completed a technical review of the Stormwater Management Plan or Geotechnical Assessment appended to the plan change request, however we highlight the importance of ensuring that all natural hazards are appropriately identified and managed as part of the proposed plan change, including liquefaction, slope instability and flooding.	Ensure all natural hazards are appropriately identified and managed as part of the proposed plan change.
Acid Sulphate Soils				
24.	Soils Assessment	Neutral	WRC's preliminary regional Acid Sulphate Soils Probability spatial layer ² indicates a high probability of Acid Sulphate Soil occurrence across substantial areas of the southern part of the site, with remaining areas largely having a low probability of Acid Sulphate Soils. However, the regional Acid Sulphate Soil map is mapped at the regional scale and, in this location, the occurrence of high Acid Sulphate Soils probability areas is largely driven by the distribution of poorly drained Gley soils mapped at the regional scale ³ . The property scale soil assessment undertaken as part of the plan change application suggests that, although poorly or very poorly drained soils are present, their location and distribution is likely different and more complex at the property scale compared with the regional scale mapping.	If Acid Sulphate Soils are identified on the plan change site, ensure appropriate guidance for their management is followed.

¹ For example, Plan Change 14 - Mangaone Precinct & C10 Industrial Growth Cell – Hautapu to the Waipā District Plan.

² See [Waikato region acid sulfate soils preliminary risk assessment | Waikato Regional Council](#) for the Technical Report.

³ See [S-Map Online | Manaaki Whenua - Landcare Research](#)

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			We note that when disturbed (e.g. excavated) and exposed to oxygen, Acid Sulphate Soil materials can produce sulfuric acid which can become mobilised following rainfall. Damage to infrastructure (e.g. concrete) and impacts on the environment (e.g. aquatic ecosystems) can result. The potential for the occurrence of Acid Sulphate Soils at the site should be considered in relation to the proposed development and appropriate guidance for their management ⁴ followed if identified on site.	

⁴ [Managing acid sulfate soils | Waikato Regional Council](#)

Further information and hearings

WRC **wishes to be heard** at the hearings for Proposed Private Plan Change 37 – Rider Park Structure Plan to the Waipā District Plan in support of this submission and is prepared to consider a joint submission with others making a similar submission.

WRC **could not** gain an advantage in trade competition through this submission.

Submitter details

Waikato Regional Council

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I could not gain an advantage in trade competition through this submission

I am not directly affected by an effect of the subject matter of the submission that:

- (a) does not adversely affect the environment; and
- (b) does not relate to trade competition or the effects of trade competition.