

From: info@waipadc.govt.nz
To: [Policy Shared](#)
Subject: External Sender: Waipā District Plan - Plan Change Submission Form 5 - Charlotte FitzPatrick
Date: Tuesday, 28 April 2026 1:57:49 pm

CYBER SECURITY WARNING: This email is from an external source - be careful of attachments and links. Please follow the Cybersecurity Policy and report suspicious emails to Servicedesk

Full name of submitter Charlotte FitzPatrick

Contact name (if different from above)

Email address

Address for service

Contact phone number

This is a submission on the following proposed plan change to the Waipā District Plan

Proposed Private Plan Change 37 - Rider Park Structure Plan

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

Are you directly affected by an effect of the subject matter that - (a) adversely affects the environment; and (b) does not relate to trade competition or the effects of trade competition? I am not

Do you wish to be heard (attend and speak at the Council hearing) in support of your submission? I do

If others make a similar submission, will you consider presenting a joint case with them at the hearing? Yes

Do you support the proposed change(s)? I oppose

The specific provisions of the plan change my submission relates to are (give details):

Proposed Private Plan Change 37 – Rider Park Structure Plan, including:

- The proposed rezoning of land from Rural and Deferred Residential (C5 Growth Cell) to Medium Density Residential
- The proposed Rider Park Structure Plan and associated staging provisions
- Amendments to District Plan provisions relating to growth sequencing, land use, infrastructure, transport and servicing
- Matters relating to infrastructure readiness (including three waters, transport and social infrastructure)
- Environmental values, biodiversity, productive land, and long-term land use change
- Provisions relating to design outcomes, neighbourhood interface and implementation

My submission is

The Cambridge Community Board is not supportive of Proposed Private Plan Change 37 in its current form.

While the Board supports well-managed, well-sequenced growth in principle, it considers that PC37 does not adequately demonstrate that bringing forward deferred land and rezoning highly productive rural land is necessary or appropriate at this time.

The Board's concerns relate to:

- Alignment with agreed growth sequencing and strategic planning
- Infrastructure readiness, including connections to and impacts on existing Council infrastructure and social infrastructure
- Transport impacts and alignment with Cambridge Connections
- The loss of highly productive land and the irreversible nature of land use change
- Environmental outcomes, biodiversity enhancement and green space protection
- Mana whenua engagement and the achievement of meaningful cultural and environmental outcomes
- Long-term risk, including ratepayer exposure and intergenerational impacts

The Board's full submission outlines these matters in detail and is provided as an attachment.

I seek the following decision/s from Council

That Council (or the independent hearings panel): Declines Proposed Private Plan Change 37 as currently proposed, or alternatively, defers or substantially amends the plan change to:

- Better align with the agreed growth sequencing and the intent of Ahu Ake – Waipā's Community Spatial Plan
- Ensure infrastructure (including social infrastructure) is confirmed, deliverable and fairly funded without undue burden on existing ratepayers
- Strengthen protections for highly productive land and require clearer justification for its loss
- Improve environmental, biodiversity and green space outcomes
- Provide clearer staging, governance and accountability provisions
- Clearly demonstrate how mana whenua values and outcomes are reflected beyond engagement processes

The Board seeks that these matters be resolved before any approval is granted.

Attachments

[Cambridge Community Board PC37 FINAL submission.docx](#) (38 kb)

Cambridge Community Board

Submission on Proposed Private Plan Change 37 – Rider Park Structure Plan

Introduction

The Cambridge Community Board makes this submission in its capacity as a statutory community advisory body representing residents of Cambridge, Leamington and Maungatautari.

The Board supports well-managed, well-sequenced growth that:

- Is enabled in step with appropriate infrastructure provision
- Carefully considers environmental constraints and long-term resilience
- Responds to community needs and wellbeing, while managing risk for existing ratepayers

The Board acknowledges:

- The need for ongoing housing supply in Waipā
- Council's obligations under the Resource Management Act
- The right of landowners to seek private plan changes

This submission does not take a simple support/oppose position. Rather, it focuses on whether PC37

- Aligns appropriately with agreed growth sequencing
- Is supported by timely, funded and deliverable infrastructure (both Council and non-Council)
- Reflects a considered balance between housing supply, environmental constraints and community impacts

The Board's perspective is grounded in its role of representing the collective interests of the local community and existing ratepayers, particularly in relation to growth timing, infrastructure burden and long-term risk.

Overview of the proposal

Our understanding is that Proposed Private Plan Change 37 seeks to:

- Rezone approximately 98 hectares of land at the south-eastern edge of Leamington from Rural and Deferred Residential (C5 Growth Cell – post-2035) to Medium Density Residential, and
- Introduce a new structure plan and supporting plan provisions to enable residential development.

The Board notes that acceptance of the plan change for public notification does not indicate Council support, and that the proposal must be tested through the submissions and hearings process, likely before an independent hearings commissioner.

Key considerations

Strategic growth sequencing and land release

The Community Board's key concern is whether bringing forward deferred land aligns with Waipā's agreed growth sequencing and planning framework.

The Board notes that much of the land subject to PC37 is currently identified for later-stage growth, signalling that development of this area was not anticipated in the short to medium term under the operative District Plan.

Matters for consideration include:

- The rationale for advancing land identified for post-2035 growth, including impacts on productive rural land
- The relationship between PC37 and:
 - Existing growth cells
 - Live and active residential developments
 - Council's broader growth, infrastructure and investment planning framework
- Avoiding development that runs ahead of:
 - Servicing capacity
 - Funding certainty
 - Transport readiness

The Board seeks clarification on:

- What immediate housing or land supply shortfall PC37 is intended to address that is not already provided for within existing live developments and zoned growth cells
- Whether sufficient land already zoned for residential development has been, or could be, sensibly brought online ahead of advancing deferred land
- What precedent may this plan change set for other deferred or rural land across the district

Highly productive land is a limited resource, and once it undergoes urbanisation, it cannot be restored. Development should be subjected to rigorous alternative assessments. Maintaining food security and supporting district productivity remain essential considerations (see the subsection below for more explanation).

Infrastructure readiness

The Board's key concern is whether infrastructure, including social infrastructure, is available, deliverable, and fairly funded, without transferring undue costs or service pressures onto existing ratepayers.

The Cambridge Community Board considers infrastructure readiness to be a critical determinant of whether the plan change should proceed in its current form. This includes not only three waters and transport infrastructure, but also the social infrastructure required to support a well-functioning community.

The Board notes public statements by the applicant indicating an intention to self-fund aspects of infrastructure delivery. While this may address some on-site works, the Board is concerned with how the development will connect to, rely upon, and impact existing Council-owned infrastructure networks and community assets over time.

Areas of focus include:

- Transport and roading
 - Connections to the existing roading network, including local roads, feeder routes and intersections
 - Footpaths and cycleways, both within the development and connecting to the wider town
 - Impacts on existing transport infrastructure that is already heavily used by the community
- Three waters infrastructure
 - How drinking water, wastewater and stormwater systems will connect to Council-owned networks
 - Whether existing pipes, treatment capacity and downstream networks are adequate
- The long-term operational and maintenance implications for Council systems
 - Social and community infrastructure
 - Schools and early childhood education capacity
 - Health and medical services
 - Emergency services and response times
 - Community facilities and services
 - Public open space, playgrounds, parks and reserves that will serve both new and existing residents
- Parks, reserves and public spaces
 - Provision of new green spaces within the development
 - The extent to which existing parks, playgrounds and reserves will absorb increased demand
 - Ongoing maintenance responsibilities and funding

The Board seeks clarity and assurance on:

- What infrastructure capacity is confirmed and available at the time of development, rather than being reliant on future upgrades or aspirational planning

- How the development will fairly contribute to existing Council infrastructure, including roads, pipes, parks and community facilities that will experience increased demand
- How costs associated with upgrading, expanding or maintaining shared infrastructure will be allocated, and how ratepayer exposure will be avoided
- How cumulative effects will be assessed where PC37 comes forward alongside other developments within Cambridge and Leamington
- What safeguards exist should enabling infrastructure or social services fail to keep pace with development

The Board emphasises that infrastructure readiness is not limited to what can be built within the site boundary, but includes the capacity, resilience and funding of the wider systems upon which the development will rely.

Transport, access and movement

The board is keen to better understand whether transport outcomes align with Cambridge Connections and support safe, connected and sustainable movement across Cambridge and Leamington.

The Cambridge Community Board notes that transport planning for Cambridge and Leamington is being guided through Cambridge Connections, a long-term programme developed in partnership with the community to improve safety, connectivity and transport choice across the town.

While acknowledging the technical traffic assessments provided as part of PC37, the Board is concerned that transport considerations for this plan change must be assessed not only in terms of traffic generation and level of service, but also in relation to how the proposed development integrates with the wider Cambridge Connections network and objectives.

The Board is particularly concerned with:

- How the development connects into and potentially impacts the existing and planned transport network identified through Cambridge Connections
- Access points into and out of the development area, including effects on Wordsworth Street and surrounding roads that already serve significant community destinations, including the cemetery, dog park and playground
- Impacts on surrounding residential streets and feeder roads, particularly during peak periods
- School travel patterns, peak congestion and local connectivity
- The safety, continuity and usability of walking and cycling connections, both within the development and linking to the wider town network

The Board notes that Cambridge Connections places strong emphasis on:

- Improved active transport networks
- Reduced reliance on private vehicles

- Safe, legible and connected streets
- Transport outcomes that support community wellbeing and place-making

The Board seeks clarification and assurance on:

- How PC37 has been assessed against Cambridge Connections principles, projects and staging
- Whether active transport connections are mandatory, continuous and deliverable, rather than aspirational
- How will additional demand from PC37 be accommodated on existing roads without undermining the agreed Cambridge Connections outcomes
- What transport upgrades are assumed but not yet confirmed, funded or programmed
- How transport impacts will be managed over time as development stages progress

The Board emphasises that transport infrastructure must not only support vehicle movement, but also contribute to a safe, connected and accessible town, consistent with the direction set through Cambridge Connections and community expectations.

Density, design and neighbourhood interface

The Cambridge Community Board's key concern is how medium-density development will be expressed adjacent to existing low-density neighbourhoods, outside the established green belt.

The Board wishes to understand:

- Anticipated dwelling yields and housing typologies
- Building height, scale and site coverage
- How transition zones between new and existing development are managed
- Both macro and micro placemaking and urban design outcomes
- The implications of rezoning rural land and how this transition will be managed respectfully

The Board seeks assurance that:

- Urban design outcomes are meaningfully guided by enforceable controls
- Amenity effects on neighbouring properties are appropriately avoided or mitigated
- Key parameters are not deferred to later stages without sufficient direction

Environmental values, productive land

The Board wants to better understand whether the proposed rezoning appropriately recognises the long-term environmental, cultural and intergenerational impacts of converting rural land to urban use.

The Cambridge Community Board notes that land identified for development under PC37 includes currently rural and productive land. The Board is concerned that once land is rezoned

and developed for urban purposes, the opportunity for future productive use, ecological restoration or other uses is permanently removed.

While recognising the need to provide for housing, the Board considers it important that decisions to rezone rural land are based on a clear understanding of long-term trade-offs, including environmental, cultural and community impacts.

Environmental values and biodiversity

The Board seeks greater clarity on how PC37:

- Enhances, rather than simply mitigates, biodiversity outcomes
- Protects and strengthens green corridors, ecological connections and open space networks
- Responds to climate change and supports long-term environmental resilience

The Board is particularly interested in understanding:

- Whether there is a clear biodiversity enhancement strategy, rather than reliance on minimum compliance
- How green spaces within the development contribute to wider environmental outcomes, not just on-site amenity
- How opportunities for land to be restored to natural or ecological functions have been considered alongside development outcomes

Productive land and irreversible land use change

The Cambridge Community Board considers the proposed rezoning of highly productive rural land to raise fundamental questions of intergenerational equity, food production and long-term economic resilience.

The Board notes that highly productive soils are a finite resource. Once land is rezoned and developed for urban purposes, the opportunity for future food production, ecological restoration or alternative rural use is permanently removed.

In the Board's view, decisions to rezone highly productive land should only be made where there is a clear and compelling justification, including evidence that reasonable alternatives have been thoroughly considered.

In particular, the Board seeks clarity on whether the following questions have been adequately addressed:

- Does the proposed development enhance Cambridge a better town, rather than simply a larger one?
- Can housing demand be more appropriately met within the existing town boundary, through intensification or redevelopment?

- Can growth be directed to land with lower productive value, rather than soils that are amongst the district's most valuable for food production?

The Board notes that much of the land subject to PC37 lies within an area recognised locally as some of the district's most productive farming land, while significant areas of the district contain soils of markedly lower productive capacity.

The Board is not satisfied that PC37, as proposed, has demonstrated that:

- The loss of highly productive land is necessary at this stage; or
- Alternative growth options have been sufficiently explored and exhausted.

The Board emphasises that land use change of this nature is irreversible, and therefore warrants a precautionary and evidence-led approach.

Mana whenua engagement

The Board recognises the importance of mana whenua involvement in shaping land use outcomes and giving effect to Te Tiriti o Waitangi.

The Board acknowledges that mana whenua will provide their own submissions and processes, and raises the following matters to ensure that cultural values and outcomes are given appropriate weight in the overall assessment of Proposed Private Plan Change 37.

While recognising that mana whenua engagement may be addressed within the plan change documentation, the Board seeks clarity on:

- The nature and timing of mana whenua engagement in the development of PC37
- How mana whenua values and outcomes are reflected in the structure plan, beyond process-based engagement
- Whether there are opportunities to strengthen cultural, environmental and place-based outcomes through the plan change provisions

Long-term risk

The board wishes to understand whether assumptions adequately reflect long-term risks and pressures.

The Board is particularly focused on:

- Growth being enabled in step with infrastructure, not in advance of it
- Using sequencing to manage ratepayer risk and community impact
- Flooding and stormwater modelling assumptions
- Climate change resilience

- Provision and protection of open space and ecological connections

The Board seeks clarity on:

- The level of conservatism applied in hazard and infrastructure modelling
- How risks are managed if future climate impacts exceed current assumptions
- Whether mitigation measures are enforceable through plan provisions

Staging, governance and accountability

The board's key concern is ensuring development proceeds only when enabling conditions are met.

The Board notes the importance of:

- Clear staging provisions
- Infrastructure trigger points
- Monitoring and review mechanisms

The Board seeks:

- Greater clarity around "no-go" conditions if infrastructure or funding is not delivered
- Visibility of how outcomes will be monitored over time

Summary and relief sought

Based on the matters outlined above, the Cambridge Community Board is not supportive of Proposed Private Plan Change 37 in its current form.

While the Board supports well-managed, well-sequenced growth in principle, it does not consider that PC37, as proposed, has demonstrated sufficient justification to bring forward deferred land, rezone highly productive soils, or adequately address infrastructure, environmental, and intergenerational impacts at this time.

The Cambridge Community Board notes that a significant portion of the PC37 land is currently identified within the Deferred Residential C5 Growth Cell, signalling later-stage development under existing growth sequencing.

While the Board supports the broad intent of Ahu Ake – Waipā's Community Spatial Plan, including compact, contiguous growth, it seeks clarity on how the proposed acceleration of this growth area aligns with Ahu Ake's emphasis on sequenced, infrastructure-led development and risk management.

The Board seeks assurance that PC37 represents a considered implementation of Ahu Ake, rather than a departure from the agreed sequencing signals that underpin community expectations, infrastructure planning and long-term investment decisions.

Accordingly, the Cambridge Community Board:

- Supports a considered approach to growth that:
 - Aligns with long-term planning
 - Protects community wellbeing
 - Avoids undue risk to infrastructure, amenity and resilience
- Seeks amendments, clarification and, where appropriate, strengthened provisions to:
 - Improve certainty
 - Reduce reliance on future assumptions
 - Ensure growth occurs at the right pace and in appropriate locations

The Board wishes to be kept informed of the hearing process and have the opportunity to speak to this submission, if appropriate.