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9 July 2026

Waipā District Council
Private Bag 2402
Te Awamutu 3840
Attn: Proposed Private Plan Change 31 Submission

waikatoregion.govt.nz

Email: districtplan@waipadc.govt.nz

Dear Sir/Madam

Waikato Regional Council Submission to Proposed Private Plan Change 31 – Te Awamutu T4 Growth Cell to the Waipā District Plan

Thank you for the opportunity to make a submission on the Proposed Private Plan Change 31 – Te Awamutu T4 Growth Cell to the Waipā District Plan. Please find attached the Waikato Regional Council's submission regarding this plan change. This submission was formally endorsed under delegated authority on 9 July 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

Waikato Regional Council submission to Proposed Private Plan Change 31 – Te Awamutu T4 Growth Cell to the Waipā District Plan

9 July 2026

Introduction

1. Waikato Regional Council (WRC) appreciates the opportunity to make a submission to Proposed Private Plan Change 31 – Te Awamutu T4 Growth Cell to the Waipā District Plan (PPC31). 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).
2. WRC has approved Proposed WRPS Change 1 - National Policy Statement on Urban Development 2020 and Future Proof Strategy Update (WRPS Change 1) to become operative on 15 July 2026. Therefore, the plan change will also need to give effect to the provisions of WRPS Change 1.
3. Our submission seeks to ensure that 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 and evidence in accordance with the relevant higher-order policy documents under the RMA, including the WRPS.
4. Council neither supports nor opposes the plan change. However, the following submission highlights areas where we recommend further assessment, as well as recommended additions to proposed provisions. In particular, we consider further assessment is required to understand sequencing and the links to urban form and transport, better determination of the potential ecological effects stemming from the plan change, and understanding potential flood hazard impacts. This further assessment should inform amendments to the proposed structure plan and provisions to ensure effects are appropriately quantified and addressed.

Sequencing, urban form and transport

5. WRC acknowledges that the T4 Growth Cell is currently zoned Deferred Residential and is identified for future urban development post-2035 in the Waipā District Plan. As the plan change proposes to bring forward the timing of development of this growth cell indicated in the Future Proof Strategy 2024 and Waipā District Plan, the proposal represents an out-of-sequence development.
6. Method UFD-M49 and APP13 Criteria A of WRPS Change 1 are relevant to the plan change. The Section 32 Evaluation for the proposed plan change provides sufficient assessment against most of Criteria A, however we note that the application does not include evidence that the plan change meets Criterion A(A) - *"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"*. We recommend this be considered further in Waipā District Council's assessment of the proposed plan change.
7. We support the proposed use of residential intensification areas on the structure plan and associated rules to ensure minimum dwelling densities are achieved for the plan change area. This gives effect to Policy UFD-P12 of WRPS Change 1 relating to density targets for the Future Proof area.
8. We also support the inclusion of the walking and cycling connections shown on the proposed structure plan, and the Commercial Overlay areas and associated rules that provide for a limited range of small-scale commercial activities to meet the day-to-day needs of residents of the plan change area.

9. These aspects of the proposed plan change will promote compact development and support multi-modal transport outcomes and connectivity across the site and to the existing Te Awamutu urban area. This aligns with Development Principle i. within APP11 of the WRPS, which promotes compact urban form, design and location.

Relief sought

- a. Provide further consideration of the proposed plan change in relation to WRPS Change 1 APP13 Criterion A(A).
- b. Retain the proposed use of residential intensification areas and associated rules to ensure minimum dwelling densities are achieved for the plan change area.
- c. Retain walking and cycling connections on the proposed structure plan.
- d. Retain the Commercial Overlay areas and associated rules that provide for a limited range of small-scale commercial activities to meet the day-to-day needs of residents of the plan change area.

Long-tailed bats

10. Long-tailed bats are a Threatened - Nationally Critical species present in the Waipā area. Potential habitat for long-tailed bats exists on the plan change site, however no surveys have been undertaken to inform the proposed plan change.
11. Section 2.1.4 of the Ecological Impact Assessment (EIA) provided as Appendix E to the plan change application states that *“Given the acknowledged presence of long-tailed bats nearby, but the lack of maternity roost trees within the site, dedicated acoustic surveys were not undertaken”*. It is unclear how this conclusion was reached, as the EIA does not indicate that any visual assessments of trees were conducted.
12. We note the EIA recommends that rules or standards could be included in the plan change requiring a site-specific bat survey and the preparation and implementation of a Bat Management Plan, however, such rules have not been included in the proposed plan change.
13. Rather than deferring a site-specific survey and development of mitigation measures to a later stage of the process, as recommended in the EIA, we consider that bat surveys should be undertaken prior to any decision on the proposed plan change. This would inform understanding of whether the site provides roosting, foraging or commuting habitat for long-tailed bats and any current use of the site by bats. The results of the surveys should then inform further assessment of potential effects of the proposed plan change, including any loss of potential roost trees, loss of foraging or commuting habitat, and other effects of urban rezoning such as disturbance from artificial lighting.
14. The further ecological impact assessment should then be used to inform any recommended avoidance, remediation and mitigation measures, to give effect to the National Policy Statement for Indigenous Biodiversity 2023 (NPS-IB) and the WRPS (Ecosystems and indigenous biodiversity chapter). This may include amendments to the proposed structure plan for protection of significant bat habitat or to provide habitat connectivity and/or the addition of new objectives, policies, rules or assessment criteria to manage effects on bats and their habitat. This should include a requirement to prepare a Bat Management Plan for the plan change area.

Relief sought

- a. Undertake surveys to inform understanding of whether the site provides roosting, foraging or commuting habitat for long-tailed bats and any current use of the site by bats, and inform further assessment of ecological effects of the proposed plan change.
- b. Use the further ecological impact assessment to amend the proposed structure plan and plan change provisions to appropriately manage effects on bats and their habitat, in accordance with the NPS-IB and WRPS.

Freshwater values

15. We consider the EIA has several key limitations in relation to freshwater values and recommend further assessment to ensure effects on freshwater species are appropriately addressed. This is discussed in relation to various sections of the EIA below.

Freshwater fish survey and interpretation

16. The fish sampling reported in the EIA was limited to three eDNA samples, and limited sampling details are provided. Without information on the number of replicates, water volume filtered, filter size, whether samples were taken from flowing or static water, sequence reads per species, or replicate hits, some species may have been missed.
17. The eDNA samples were collected in winter, which is suitable for mudfish sampling but less effective for many other species. We consider that undertaking summer sampling would strengthen the results. Reliance on eDNA alone also means key ecological metrics are missing. Although eDNA is useful for detecting presence or absence, it provides limited information on abundance, population structure, breeding status, and habitat use.
18. The EIA identifies that black mudfish, an At Risk – Declining species, have been detected within the proposed plan change area. This is significant because wetland and stream habitats supporting this species have become highly fragmented across the Waikato.
19. As noted above, eDNA sampling is useful for presence/absence detection but provides limited additional information, so important details about the mudfish population at this site remain unknown. We recommend the site should be surveyed using Gee Minnow traps to determine the extent of mudfish presence. This method is commonly used in development projects where mudfish are present.
20. Overall, we consider a clearer understanding of mudfish and other species on the site is needed to better inform fish values, protection requirements, and mitigation measures for the proposed plan change.

Ponds

21. The EIA states that as the ponds and drains on the plan change site have been determined artificial, they are considered to be of negligible ecological value. We do not consider this conclusion can be reached without pond sampling.
22. The key question is whether the ponds contribute to freshwater values, ecological function, or species habitat. The National Policy Statement for Freshwater Management 2020 (NPS-FM) places emphasis on indigenous biodiversity, habitat of indigenous fauna, and ecosystem health. A waterbody is not automatically of negligible ecological value because it was excavated. We note there are also many examples of eels and mudfish occurring above apparent fish-passage barriers, particularly where connection occurs during flood flows.
23. The EIA tends to separate streams, wetlands, and ponds into discrete units; however, these are likely to function as a connected freshwater network. If the ponds provide refuge, feeding habitat, or

breeding habitat, they contribute to the overall freshwater system and should not be dismissed due to being considered “artificial”.

24. If the ponds are confirmed as fish habitat or seasonal refuge habitat, they should be retained where practicable. If they are removed and fish are present, mitigation for lost habitat should be provided for.

Effects on wetlands

25. We acknowledge the revisions to the proposed structure plan to reduce impacts on streams and wetlands, and we support the approach of protecting as many of the natural hydrological features from development as possible. We consider, however, that there are some remaining areas of uncertainty in relation to effects on wetlands, freshwater habitat loss and proposed compensation.
26. We recommend further assessment be carried out of potential effects of proposed roading on the ecological integrity of Wetland 1. This should include consideration of effects on connectivity and resilience, including effects of noise, light, pollutants and vehicle movements on the functioning of the wetland. Hydrological assessment is also needed to demonstrate that roads will not influence the hydrology or functioning of the remaining wetland parts.
27. The proposed permanent loss of natural inland wetland extent does not align with Policy 6 of the NPS–FM. The EIA states that *“Whilst it is considered the BCM [Biodiversity Compensation Model] provides sufficient evidence to demonstrate the required effects management can be achieved within the site so that there would be no net loss of biodiversity values, or extent of natural wetlands”*. However, we note that the BCM output refers to creation of low value wetland and restoration of already low and high value existing wetlands; we therefore recommend this be clarified. We also recommend further information and clarification is needed about how additional natural inland wetlands are proposed to be established.

Freshwater habitat loss and mitigation

28. The proposed loss of 0.35ha of wetland would mean the permanent loss of black mudfish habitat, wetland invertebrate habitat, wetland hydrological functions, and edge habitat associated with Stream 1. The EIA proposes restoration of retained wetlands, creation of 2.12ha of new wetland habitat, riparian planting, and enhancement works, and predicts an 84.9% net gain outcome (using the BCM).
29. We consider there are potential issues and uncertainties around the proposed compensation, as created wetlands are not equivalent to existing wetlands. There is uncertainty because created wetlands take years to mature, black mudfish colonisation is not guaranteed, hydrology may not replicate existing conditions, and ecological function can take decades to develop. The compensation model is therefore highly dependent on optimistic restoration assumptions.

Altered wetland hydrology, stormwater and long-term risk

30. The EIA assumes wetlands can be retained and enhanced while urban development enabled by the proposed plan change proceeds around them. However, urban development frequently alters groundwater recharge, runoff timing, water-table fluctuations, and hydroperiod (duration of inundation). Even where wetland area remains mapped as “wetland”, ecological function can decline if wetlands dry more often, water levels become flashy (rise and fall rapidly), predation risk increases, and summer refugia disappear.
31. The EIA acknowledges a transition from agricultural contaminants toward urban contaminants such as zinc and copper. Stormwater wetlands can remove most urban contaminant material, but we note that performance often declines if maintenance is poor. As a result, fish habitat quality, invertebrate communities, and wetland vegetation may gradually deteriorate. This may not be detectable immediately following development.

32. Overall, the combination of natural wetland loss, major hydrological changes, and stormwater inputs raises the risk of permanent loss of black mudfish habitat and, ultimately, black mudfish from the plan change area.

Relief sought

- a. Provide further assessment of potential effects of proposed roading on the ecological integrity of Wetland 1.
- b. Provide further clarity in relation to the proposed compensation for loss of natural inland wetland and how additional natural inland wetlands are proposed to be established.
- c. Undertake additional targeted fish investigations sufficient to determine population size, distribution, habitat utilisation and long-term viability of black mudfish and other indigenous fish species across the site prior to any decision on the proposed plan change, to inform further assessment of ecological effects of the proposed plan change.
- d. Use the further ecological impact assessment to amend the plan change to appropriately manage effects on freshwater fish species.
- e. If the investigations determine that the black mudfish population in the plan change area is significant, add a rule requiring a species-specific Black Mudfish Management Plan to be prepared and implemented.
- f. The Black Mudfish Management Plan should also require retained wetlands and compensation wetlands to be legally protected and managed in perpetuity.

Other considerations

Flood hazard management

33. The flood modelling undertaken as part of the plan change application provides sufficient information to inform the plan change process. We note, however, that future modelling/assessment could identify significant changes to the earthworks and subdivision layout to ensure flood hazard and stormwater management is undertaken appropriately.
34. We also note that the North Island Main Trunk culverts are a key flood/stormwater control for the proposed development. It is therefore important that KiwiRail remains involved to inform detailed design as appropriate.

Acid sulphate soils

35. WRC's preliminary regional Acid Sulphate Soils Probability spatial layer¹ indicates a high probability of acid sulphate soil occurrence in the western part of the site.
36. 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 management² followed if identified on site.

¹ See [Waikato region acid sulfate soils preliminary risk assessment | Waikato Regional Council](#) for the Technical Report.

² [Managing acid sulfate soils | Waikato Regional Council](#)

Further information and hearings

WRC **wishes to be heard** at the hearings for Proposed Private Plan Change 31 – Te Awamutu T4 Growth Cell 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.